

# Kenepuru & Central Sounds



Kenepuru & Central Sounds Residents Association Inc.

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22 Oct 2014

Dear Sir

## **Best Practice Guidelines for Salmon Farm Management in the Marlborough Sounds**

You have asked for comments on the above and the Kenepuru and Central Sounds Residents' Association is pleased to assist.

The Association was established in 1991, and currently has over 200 household members whose residents live fulltime or part-time in the Kenepuru and Pelorus Sounds. The Association's objects include, among others, to coordinate dealings with central and local government and promote the interests of residents of Kenepuru Sound and adjacent areas, and to promote and act in the best interests of residents, ratepayers, and persons associated with the Kenepuru and central Sounds area. For further information see our website [www.kcsra.org.nz](http://www.kcsra.org.nz).

As you may be aware, the Association participated actively in the Board of Inquiry commissioned to hear New Zealand King Salmon's application to vary the Marlborough Sounds Plan and establish nine new salmon farms in areas prohibited for salmon farming. As a result of participating in that process, the Association now knows a lot more about the adverse effects from salmon farming and the potential consequences of insufficient oversight and monitoring of salmon farming activities. The Association was surprised and dismayed at the relatively light handed and tardy monitoring that seemed to be taking place for existing salmon farm operations.

Accordingly we are pleased that the Marlborough District Council and NZKS, along with at least one central government agency, and various other stakeholders including at least one from the Sounds Advisory Group have endeavoured to develop a set of consistent guidelines/standards for the monitoring of salmon farming in the Sounds. The Association is pleased to support this initiative. In passing, we are a little surprised to note the apparent

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### **Kenepuru & Central Sounds Residents Association Inc.**

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absence of the Department of Conservation. Is there a reason for this?

As can be appreciated, the draft guidelines are something of a heavy read for those without a good technical grasp of the subject. In the Association's submission on the review of the MSRMP the Association made the case for a Council funded independent professional (technical) community representative and this matter reinforces the need for such a position to address this imbalance. That said, we make the following technical comments.

### **Technical comments on ES requirements**

The Association has reservations about the determination of the extent of the outer limit of effect (OLE) and the use of the standard of <ES 3.0 when the draft guidelines also state that natural conditions in the Sounds range from ES 1.5 – 2.5. As we see it, this allows a "silent" zone between the OLE and the natural benthic area to develop, which is unspecified in area or management, and as a consequence may have ES levels that creep unacceptably upwards. These areas could potentially be large, depending on currents and some of these areas could have their ES levels doubled by the farming activity. **We submit** further work should be done on this issue.

We **have reservations** about the allowable ES level being set at 5.0 directly below the farms as in our view the draft guideline graphs appear to demonstrate that this is a standard close to "benthic meltdown".

In our submission to the BOI we advocated for an upper acceptable level of ES 4.0. The **Association submits** that the draft guidelines are deficient in this aspect and **we submit** that further work should be done as in the Association's view, all the evidence points to ES 4.0 as being more environmentally friendly to the coastal ecosystems and thus for the entire Sounds community.

We note that the community scientific representative from SAG (Mr Rob Schuckard) was able to have recorded his dissenting views on the consequences of exceeding permitted EQS standards for the zone of maximum effect under the net pens. **We concur** with Mr Schuckard that fallowing of the farm should occur when the enrichment stage exceeds ES 5.1. In our view, this is still in keeping with the BOI determination that there be a graduation of consequences for exceeding ES 5.0. Setting the limit at ES 5.6 before fallowing is mandatory, as suggested by the draft guidelines, is far too detrimental to the environment.

The Association **is uneasy** about the reference to "Transitional Arrangements" for the likes of the Ruakaka farm in the "Public Summary" document. For some reason there is no discussion of this proposal in the full draft guidelines document. At a conceptual level we do not see allocation of further sites as an appropriate response to over-enrichment or other environmental issues arising with existing sites. Until there is a fuller discussion of this the Association wishes to make it clear that the Association's general support **does not extend** to this suggestion.

The **Association submits** and strongly supports that monitoring of salmon farms as to whether or not they meet the finalised guidelines should be done regularly and by an independent qualified organisation. These results need to be made available to both the Council and the community far more quickly than seems to be the case based on evidence presented at the BOI. The Association submits that the guidelines should stipulate timeframes as to distribution of results and believes the standard should be in terms of weeks rather than the months suggested for the all important Type 2 reports.

## General comments

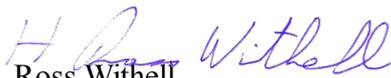
The Association, by and large, sees the draft guidelines as a big improvement on current practices and accordingly supports the move to make the guidelines directly applicable to all the existing salmon farms as soon as possible.

The Association notes the discussion that the guidelines when finalised should operate as a living document. In other words, not set in stone but may be amended from time to time as future developments/consequences become apparent. So long as there is adequate notice to the community as to the need and rationale for such changes, then the Association supports the ideal of a “living document”.

Finally, the **Association supports** this initiative in trying to better manage the adverse benthic footprint arising from salmon farm operations but also submits that it would be very desirable and indeed appropriate to carry out a similar exercise for water column management and monitoring in relation to salmon farm operations.

We would be happy to discuss our submission with you further should you think this might be of assistance.

Yours sincerely

  
Ross Withell  
President

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