



ISSUE

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OUR FIRST E-NEWSLETTER!!

FRIENDS OF NELSON HAVEN AND TASMAN BAY INC.

We hope that you find the information in the newsletter interesting and encourage you to contact

em@nelsonhaven.org.nz

If you have any questions or anything that you think might help us in the “public good” work that we do please get in touch.

We value your membership of the Friends without which we could not function. We also encourage you to forward or pass on this newsletter to your friends and family – or include some comments from the newsletter on your Facebook page.

Welcome to this, the first newsletter from the Friends of Nelson Haven & Tasman Bay Committee in our 46th year of speaking out on activities that have the potential to adversely affect or degrade the marine environment and habitats in Te Tai Ihu of Te Waka a Maui - the Top of the South Island.

You may ask: *why a newsletter?*

The committee would like to keep you up-to-date with issues we think important rather than solely relying on the “after the event” Annual Report.... and include links to interesting items. Ideally a regular Facebook page or a Twitter account would be useful but our small committee has neither the time nor the ability to do this, and deviate from our core functions, as we see them.

This issue will focus (mostly) on Aquaculture, and in particular salmon farming (note: NZ King Salmon's major shareholder is the Malaysian investment company Oregon Group). There are a number of inter-linked reasons for this. We believe that recent central government actions have led to a “gung ho” attitude to aquaculture, in particular salmon farming and its

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perceived economic benefits, which will lead to bad decision-making and further degradation and despoilment of the marine environment, for private benefit.

From 2020 Friends will be emailing out the Annual Report and subscription notices. This is partly because many people prefer an electronic copy and partly to conserve funds with the price of postage and printing escalating. We have kept our subscription low, so everyone can afford it. If you do not have a reliable email address or particularly want a printed copy posted please let us know, by replying to this email, or sending us a note at PO Box 365, Nelson 7040.

New Zealand Biodiversity Strategy 2020 (BDS).

Several committee members attended a disappointing public session on the consultation document for the proposed NZ Biodiversity Strategy *Te Kōihoa o te Kōihoa* in the Trafalgar Centre. It was the first of a series of road shows led by the Department of Conservation, the lead government agency for this document produced in fulfilment of the government's commitments to the Convention on Biodiversity, throughout the country. Why 'disappointing'? While this may have been the first road show it had all the hallmarks of being under-prepared. However, as this is the strategy that addresses **coastal and marine biodiversity** the Friends submitted on the draft document. This proposed an Action Plan and raised a series of questions in relation to the proposed plan to be responded to by submitters.

The BDS includes biodiversity in coastal and marine areas; the coastal and marine areas will not be covered in the Proposed National Policy Statement on Indigenous Biodiversity (NPSIB) which is now out for public consultation.

CENTRAL GOVERNMENT



Central government:

National Environment Standard of Marine Aquaculture -NES (MA): the focus of this document was to minimise, or remove, the financial costs of renewal of coastal permits with the terms (usually up to 35 years) being automatically extended on application to councils with no public consultation allowed, that is, a permitted activity. In our view this would mean that changing environmental conditions, for example acidification or warming of coastal waters, or increased sedimentation; or the public desire for areas free from aquaculture structures or indeed the cumulative effects (which currently cannot be taken into account even for new applications or variations) from marine farming, cannot be re-assessed when the consents are due for expiry. The proposed regulations created by the NES (MA) will be out for consultation early in 2020. You should note that all council plans will have to comply with the NES (MA) and its regulations.

(Note: at this time the Aquaculture Management Areas in Waikato, Golden Bay and Tasman Bay and the Wainui spat farm are not covered by the NES (MA). Also of interest to us is the relationship between the New Zealand Coastal Policy Statement 2010 (NZCPS), particularly Policies 8, 11, 13 & 15.

Question: Which has priority: the NES (MA) or the relevant policies of the NZCPS 2010 (the status of some of these policies – which require **avoidance** of effects – has been tested in the Supreme Court & Court of Appeal).

... and to follow on....

Aquaculture: Marlborough Environment Plan (MEP).

The proposed MEP consultation and hearings have been completed – **except for the yet to be notified proposed chapter on Aquaculture!** This plan chapter is being used as a reassessment of the allocation of marine farming space in the sounds.

Existing farms are potentially allocated in a spatial allocation considered to be appropriate by establishing an "Aquaculture Management Area" (AMA).

Hopefully more funding will be allocated to develop methods to address the potential for cumulative benthic and water column effects.

The promotion of expansion of marine farming to occur in offshore waters may well be part of the proposal as well.



Auditor-General's Report on Marine Protection (June 2019)

<https://oag.govt.nz/2019/marine-environment>

This report looked at how two groups used two different processes to provide advice to Ministers for establishing marine protection, including marine reserves.

The Auditor-General “encourage[d] the Department of Conservation and the Ministry for Primary Industries, as the stewards of an important natural resource, to consider how any reform to marine biodiversity protection legislation, policy, or planning could support greater collaboration between parties, and ultimately protect New Zealand’s unique marine biodiversity in a more effective way” recommending that the two agencies in addressing this, that “any reform to marine biodiversity protection legislation, policy, or planning could support greater collaboration between parties, and ultimately provide more timely, appropriate, and sustainable protection for New Zealand’s unique marine biodiversity; [and that they] work together ahead of time to collect and collate all available information on an area that is being considered for marine protection or management to ensure that it is available to members of Marine Protection Planning Forums or working groups in a timely way.”

The outcome of this report does not however appear to consider “under threat” marine biodiversity in areas such as the Marlborough Sounds.

Ministry for Environment/Statistics NZ – Our Marine Environment 2019

<https://www.mfe.govt.nz/publications/environmental-reporting/our-marine-environment-2019>

This report has been described as “damning” with Dr Matt Pinkerton a marine ecologist at NIWA saying that what jumped out at him from the report was “*the lack of adequate information on most issues affecting our marine environment and the fact that different pressure interact and can reinforce each other creating complex threats.*” He said the report was a “*call to arms to New Zealand.*” The report notes that the decline of biodiversity and habitat condition and extent is as a consequence of human activities.

While noting the paucity of accurate assessment of the 30% of biodiversity that exists in the sea, the report estimates that 22% of marine mammals, 90% of seabirds and 80% of shorebirds are threatened with, or at risk of, extinction. Non-native species are rising and causing further impacts on the marine biodiversity.

Other local issues:

Salmon farming is on the increase in Marlborough Sounds/Cook Strait:

Salmon relocation – NZ King Salmon (NZKS). The Minister of Primary Industries (MPI) used, for the first time, power under section 360(A) of the Resource Management Act to overrule the Marlborough District Councils plan to allow NZKS to move several of its salmon farms from “low flow” areas to sites where aquaculture had been prohibited under the plan. *“Private profit without consultation for pollution of public sites”.*

Monitoring has been undertaken on this site as a permitted activity. In 2017 NZKS stated that commercial offshore farming would occur *“some time in the future, perhaps up to 10 years away”*; their current plan is that this “open ocean” farm will be operational by 2020!!

Ministry of Fisheries NZ/Ministry of Primary Industries has just released the **Best management practice guidelines for salmon farms in the Marlborough Sounds Part 2: Water quality standards and monitoring protocol (Version 1.0) New Zealand Aquatic Environment and Biodiversity Report No. 230.**

<https://www.mpi.govt.nz/dmsdocument/37377/direct>

The Friends Committee member represented was part of representation of Sounds Advisory Group on this working group. Further comments from our representative:

- “Far field” monitoring of nutrients will apply. Nearby monitoring stations are likely to miss the plume release of waste products which can be erratic as a result of time of year, tidal cycle, occupied cages, to mention a few – this made outcomes almost meaningless and often underestimated the true values according to feed input. Note: council is able to check the feed receipts/documentation to individual farms. It is important for community to ask the regulator if such checks have taken place and what the outcomes were (camera use in future perhaps?). Benthic monitoring is more likely to show environmental changes much earlier than “far field” monitoring – annual monitoring reports are important.
- Overall, water column monitoring is a complex matter for regulator due to far-field effects and establish causality of these effects with certain consent holder(s).
- No clear evidence of higher nutrient levels as result of existing activities measured so far. Note: There is a potential technical issue here whether the design of sample frequency and density of stations will be able to show spikes of nutrients? A few more stations will be added to overall pool to encapsulate ‘far-field effects’.
- Table 1: Estimates of potential inputs and losses of nitrogen (N) from Pelorus and Queen Charlotte Sounds. Salmon farming inputs are estimated here assuming that 49 kg of nitrogen is released per ton of feed (see narrative below table). Other losses and inputs are sourced from Knight (2012). The contribution of other sources of nitrogen to the Marlborough Sounds is also covered to some degree by several other pieces of work (Gillespie et al. 2011, Hadfield et al. 2014, Broekhuizen et al. 2015). *(from Board of Inquiry hearing)*

Description N input (or loss) in tonnes per year *		
	Pelorus Sound	Queen Charlotte Sound
Salmon farming*	310.5	660.6
Riverine input*	580.1	25.6
Oceanic input**	4200	1650
Mussel harvesting	(266)	(11.8)
Denitrification	(465)	(367)

Inputs will vary largely from year to year and season to season.

Why do we want to know the mortality numbers?

This site was selected, as part of the “relocation process” due to its high flow, cooler waters – but mortality appears to have exponentially increased.

We believe that there needs to be discussion on what is a sensible fish stocking regime OR some biomass proxy on a per cage basis; this discussion cannot occur in any meaningful way without having full access to the facts, including mortality numbers and causes.

- The guidelines will be reviewed at least every five years. The purpose of each review will be to ensure that the Water Quality Standards (WQS), monitoring and management of possible salmon farm induced water quality effects in the Marlborough Sounds remains cognisant of emerging local and international practices and knowledge, and new monitoring technologies.
- **Waitata Reach in Outer Pelorus Sound** – an NZKS salmon farm, which was established as a consequence of the Board of Inquiry and Supreme Court ruling decisions in 2014, with 8 salmon cages approved but also with feedstock and “footprint” (faeces, uneaten food etc) limits and adaptive management to become operative **if** certain monitoring requirements were met, has been the subject of an application to increase the number of cages *‘in order to reduce loss of salmon the stress caused by increased water temperatures’*. Friends found that the activity is seriously non-compliant e.g. the “footprint” is much larger than that approved – despite lower feedstock being distributed; and this will adversely affect the benthic environment as well as increased disturbance of the feeding, resting and breeding habits of the rare endemic king shag. Biosecurity threats are also likely to increase. The outcome of Commissioner hearing (26/27 November) will not be known until early 2020.
- The Friends have lodged an **Official Information request to MPI on the mortality rates of salmon** on this site in the Waitata Reach. Salmon mortality data has been provided to MPI since around 2015. Biosecurity NZ refused this request on behalf of MPI stating that provision of such information was *“commercially sensitive and subject to an obligation of confidence”* and that this outweighed the public interest in provision. A link to a report from 2017 covering 2015 research suggested a biosecurity link to disease. The Friends then lodged a request to the Ombudsman’s Office asking for an investigation and review of this refusal to supply the requested information. **We have been advised that the Ombudsman will follow this up.** Friends are to provide further information and anything relevant from the Commissioner hearing (as per bullet point above).

The links below provide further information:

- <https://www.stuff.co.nz/environment/117744302/nz-king-salmon-faces-local-opposition-in-attempt-to-add-pens-to-pelorus-sound-farm>
- <https://www.stuff.co.nz/business/112924308/salmon-company-and-government-careful-not-to-collude-during-relocation-proposals?rm=m>
- Submissions have also been lodged by Friends on:
 - NZKS Mid Bay Waitata Reach salmon farm relocation
 - NZKS new application of “Open Ocean” farming in Cook Strait: (Resource consent number: U190438 is to **establish and operate new salmon farms within a 1791 hectare site located 5-12 kilometres to the north of Cape Lambert in Outer Pelorus Sound/Cook Strait**. Submissions close: 16 December. The entire application can be accessed from the Marlborough District Council website – search on the application number

Sprats and spats (other snippets of interest):

- The aquatic veterinarian and president of the NZ Federation of Freshwater Anglers, Dr Peter Trolove of Canterbury stated that fish farming has its limitation in New Zealand and contradicts the country's clean, green branding image.
- He gave as a graphic example NZ King Salmon's Marlborough Sounds operations which accept a 25% mortality per production cycle as normal.
- He said that *"based on the Ministry of Primary Production (sic) information King Salmon have experienced losses of up to 70 percent ... associated with the bacteria New Zealand Rickettsia-like organism Tenacibaculum maritimum"* adding that *"Ministry reports were critical of NZKS's biosecurity"*.
- Dr Trolove noted that in Scotland yearly losses of up to 34% have been reported with an average of around 20%. *"These losses are considered as unacceptable to the Scottish Government and yet NZKS losses are seen as okay ... despite NZ not having the pathogenic parasites, bacteria and viruses that affect Scottish farms"*, he said. Dr Trolove said that fish were defined as animals under NZ Animal Welfare legalisation. *"What other livestock industry would* [Source: Scoop 12 August 2019: abridged]

Strategic Plan for the Scallop Fisheries

Scallops in Top of the South:



You may be aware that all three of the commercial (and recreational) take of scallops, Tasman Bay, Golden bay and Marlborough Sounds, have collapsed, and all take is prohibited. In the Sounds, closed since 2016, however, there appears to be some healthy biomass with a Southern Scallop Working group (SSWG) having been set up under Fisheries NZ to create a strategy to rebuild the fishery to create a "sustainable" fisheries there (note – this is not the same as sustainability under the RMA!). It is perceived that this strategy may also be implemented in Golden Bay and Tasman Bay. The Friends have been asked if they wish to participate in a Working Group to cover these area. Anyone interested in this issue should contact Helen at em@nelsonhaven.org.nz

- An interesting website from Norway is:
Green Warriors of Norway: <http://arkiv.nmf.no/default.aspx?pagelid=336>
- **Councils showing the way?** MDC on protecting fossils:
<https://tinyurl.com/vrjsiga>
- <https://www.mnz.co.nz/news/national/400623/candidates-support-blue-belt-protection-of-wellington-coast>
- And an update on the Rena sinking: <https://teaomaori.news/eight-years-on-remnants-rena-wreckage-remain>

That's it for now folks! Please contact us if you want to add to this newsletter in the future or if you have enjoyed reading it. Our contacts are: em@nelsonhaven.org.nz and you will have received this newsletter on our new gmail address: [<friendsnelsonhaven@gmail.com>](mailto:friendsnelsonhaven@gmail.com)

Cheers, Helen C. (for the committee) with grateful thanks to Rosie for formatting/presentation.