



## New Zealand King Salmon Proposal Submission Form

Section 149E and 149O of the Resource Management Act 1991, Form 16B

To:	Or:
Environmental Protection Authority	Email: <a href="mailto:kingsalmon@epa.govt.nz">kingsalmon@epa.govt.nz</a>
New Zealand King Salmon Proposal	Fax: (04) 914 0433
Private Bag 63002	[Note: if you are emailing or faxing your submission, please mark in the subject line: 'Submission: (your name), New Zealand King Salmon Proposal']
Wellington 6140	

**Note: A copy of this submission form must also be sent to the applicant as soon as reasonably practicable after you have served your submission on the EPA.**

Please serve a copy of your submission on The New Zealand King Salmon Co. Limited (the applicant) as below:

New Zealand King Salmon Co. Limited

c/- Russell McVeagh

Attention: James Gardner-Hopkins

P.O. Box 10-214

Wellington 6143

Or email: [james.gardner-hopkins@russellmcveagh.com](mailto:james.gardner-hopkins@russellmcveagh.com)

Or fax: 04 819 7579

This is a submission on a matter/s in relation to which the Minister of Conservation made a direction under s147(1)(a) of the Resource Management Act 1991. It is important that you complete all sections on this form and that the EPA receives this submission before the closing date and time below. If you have any questions about making a submission, or you do not understand part of this form, please contact the EPA on 0800 722 667, or visit <http://www.epa.govt.nz/Resource-management/King-Salmon> for details of the Friend of Submitter, who is available to provide assistance and information on the board of inquiry process.

**Closing Date and Time for Submissions: 5.00 pm, Wednesday 2 May 2012.**

Submitter Name: Yachting New Zealand Incorporated

## Submitter Details

<b>Title:</b>	<input type="checkbox"/> Mr <input type="checkbox"/> Mrs <input type="checkbox"/> Miss <input type="checkbox"/> Ms <i>(Please tick (✓) the appropriate title(s) and print carefully below)</i>		
<b>My/Our Full Name(s):</b>	Yachting New Zealand Incorporated		
<b>Postal Address:</b>	PO Box 91209, Victoria Street West, Auckland 1142		
<b>Physical Address:</b>	85 Westhaven Drive, Westhaven, Auckland 1010		
<b>Work Ph:</b>	+64 9 361 4024	<b>Home Ph:</b>	
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<b>Cell:</b>	021 489 121	<b>Email:</b>	dabercrombie@yachtingnz.org.nz

## Electronic Communication

- The EPA has a preference for receiving submissions via email, and for providing information and updates to, or serving documents on, submitters via email also. Please tick here if you agree to your email address being used for these purposes.
- Or, if you would prefer to have a paper copy of documents please tick here. (Please note that this may not be possible with all documents and the means of communication with submitters may be the subject of directions by the NZKS Board of Inquiry).

## Trade Competition

I am not a trade competitor of the applicant.

*Omit this paragraph if you are not a trade competitor.*

I am/am not\* (\*omit one) directly affected by an effect of the subject matter of the submission that:

- adversely affects the environment; and
- does not relate to trade competition or the effects of trade competition.

*Note: If you are a trade competitor, your right to make a submission may be limited by section 149E of the Resource Management Act 1991.*

## Privacy and Official Information Act

Your personal information provided on the cover page of this submission form will be held by the EPA at its Head Office in Wellington (BP House (Level 1), 20 Customhouse Quay, Wellington). All information held by the EPA is subject to the Official Information Act 1982. It will be used by the EPA as required for the administration of these notified Proposed Plan Changes and Resource Consent Applications, and copies will be provided to the NZKS Board of Inquiry and the applicant, and will also be provided to other parties to the process. It will not (other than your name) be published on the EPA website. However, the pages of the submission form following this cover sheet (including your name) and any attached information will be published on the EPA website, and made available to members of the NZ King Salmon Board of Inquiry, the applicant and the public for use in the processing and consideration of the NZ King Salmon Proposal. You have the right to access and correct personal information held by the EPA.

Submitter Name: Yachting New Zealand Incorporated

## Submitter Position

Please tick (✓) the relevant box(s) below to show whether you support the applications in full or in part, or oppose the applications in full or in part, or are neutral. Please note that you cannot be neutral and support or oppose the applications in full; however you may be neutral to part of the applications and / or support and / or oppose the applications in part.

<input type="checkbox"/> I / We support the applications in full	<input type="checkbox"/> I / We support the applications in part
<input checked="" type="checkbox"/> I / We oppose the applications in full	<input type="checkbox"/> I / We oppose the applications in part
<input type="checkbox"/> I / We are neutral on all aspects of the applications	<input type="checkbox"/> I / We are neutral in part

The matters are listed below. Please tick the boxes on the following pages to identify whether you are making a submission on all of the matters being applied for or just some of them.

- I/we make my/our submission concerning all Proposed Plan Changes and Resource Consent Applications below OR
- My/our submission only concerns the Proposed Plan Changes and Resource Consent Applications that I/we have ticked below (✓):

	Support	Support in Part	Oppose	Oppose in Part	Neutral	Neutral in Part
<b>Applicant: The New Zealand King Salmon Co. Limited</b>						
<b>Proposed Plan Changes to the Marlborough Sounds Resource Management Plan (MSRMP) (as prepared by Marlborough District Council)</b>						
<b>NSP 11/03. 001:</b> The Proposed Main Plan Change proposes the introduction of a salmon farming zone to the MSRMP and the re-zoning of eight specific areas for salmon farming, together with other changes to the MSRMP to enable salmon farms in those locations (as a controlled activity).	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>NSP 11/03. 002:</b> The Proposed Ancillary Plan Change addresses the method of allocation of the right to apply for coastal space for marine farming in the Marlborough Sounds.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Submitter Name: \_\_\_\_\_

**Concurrent Resource Consent Applications**

Concurrent applications for resource consent(s) (coastal permits) to construct and operate salmon farms and undertake salmon farming at the eight sites that the Proposed Main Plan Change relates to. The consent applications have their own unique numbers, and are listed below.

	Support	Support in Part	Oppose	Oppose in Part	Neutral	Neutral in Part
<b>NSP 11/03. 003:</b> The Waitata site in Pelorus Sound (Site 1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>NSP 11/03. 004:</b> The Kaitira site in Pelorus Sound (Site 2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>NSP 11/03. 005:</b> The Tapihi site in Pelorus Sound (Site 3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>NSP 11/03. 006:</b> The Richmond site in Pelorus Sound (Site 4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>NSP 11/03. 007:</b> The Papatua site in Port Gore (Site 5)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>NSP 11/03. 008:</b> The Kaitapeha site in Queen Charlotte Sound (Site 6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>NSP 11/03. 009:</b> The Ruaomoko site in Queen Charlotte Sound (Site 7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<b>NSP 11/03. 010:</b> The Ngamahau site in Tory Channel (Site 8)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**White Horse Rock Resource Consent Application**

	Support	Support in Part	Oppose	Oppose in Part	Neutral	Neutral in Part
<p><b>NSP 11/03. 011:</b> An application for resource consent(s) (coastal permit(s)) to construct and operate a salmon farm and undertake salmon farming at a site at White Horse Rock, Pelorus Sound, on a site that is zoned Coastal Marine Zone 2.</p> <p><i>Note: this consent application does not require a plan change in order for resource consent to be applied for. The site currently has an existing but unimplemented resource consent for a mussel farm.</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Submitter Name: Yachting New Zealand Incorporated

## Reasons for Submission

If you are making a submission only on parts of the Proposed Plan Changes and/or Resource Consent Applications, please note which part when specifying the reasons for your submission.

The reasons for my / our submission are:

Yachting New Zealand (YNZ) is the National Sports Organisation (NSO) which represents 31,000 yachting and boating members in 123 yacht clubs from Taipa in the north to Bluff in the south – also affiliated are 50 class associations and 40 maritime associations. Many of our members are involved in both power and sail driven activities in both the recreational and commercial marine industry.

Yachting New Zealand is not opposed to aquaculture per se, however aquaculture and much of the activity YNZ promotes and protects is mutually exclusive; the physical nature of aquaculture means that it takes up space in the marine coastal area that then cannot be used by others. Yachting New Zealand feels that it is important that any aquaculture development takes place in areas where there will be no adverse affect on the community's access to the water for recreations use.

Growth in aquaculture in New Zealand needs a balanced, well considered and well managed approach. Government needs to be wary of overly permissive rules for the aquaculture industry and economic gains at the expense of our environment and natural waterways that makes New Zealand such a strong maritime nation.

It is recognised in the New Zealand Coastal Policy Statement 2010 that aquaculture be placed in appropriate areas. The term "appropriate" is clearly defined within Marlborough Sounds Resource Management Plan.

The Marlborough Sounds Resource Management Plan [MSRMP] has designated areas [Coastal Marine Zone 1] which prohibit marine farms to ensure that access to recreational water space is maintained for the wider community.

The MSRMP has designated areas [Coastal Marine Zone 2] as areas that allow for marine farming.

The Coastal Marine Zone 2 areas generally comprise Pelorus Sound and Port Underwood which are reaching full capacity, and this application seeks to open up previously protected areas [CMZ 1] to marine farming.

The loss of high value space in the Marlborough Sounds [including opening areas up within Coastal Marine Zone 1 areas], such as the areas being applied for by NZKS would see a loss of traditional sailing and cruising grounds. This would see a weakening of our sailing culture in New Zealand and will have an adverse affect on New Zealand being a destination for foreign cruising boats.

Yachting New Zealand wants to ensure that appropriate consideration is given to the below factors, and that suitable tests are put into policy to protect against adverse effects of establishing marine farms. We seek that any decision should take into account the effect the proposed aquaculture development has on:

- Manageable inshore waters for small sailboat racing
- Bays, passages and coastal area used for cruising

- Sheltered anchorages for day and overnight stays
- Ports of refuge in foul weather
- Navigational hazards posed by imposed structures
- Common navigational passages used by boaties
- Aesthetic value

Such tests exist and are written in to legislation for recreation and commercial fishing activity, known as the UAE test (Undue Adverse Effects test). If a prospective aquaculture development does not pass this test it cannot progress to the resource consent stage. YNZ sought a similar approach to be taken that recognises the effects listed above. YNZ and other submitters put this forward to the Select Committee considering submissions on the now passed Aquaculture Legislation Amendment Bill but were largely ignored.

For any successful application Yachting New Zealand seeks minimum requirements placed on the applicants which include:

- Clearly marking structures so they are visible in all conditions and a requirement to remove structures once they outlive their usefulness.

Aquaculture structures pose safety hazards for vessels. Potential accidents include vessels colliding with structures, becoming tangled up in the structures, or not being able to find suitable anchorage in severe weather. In the worst case vessels could sink as a result of collision. Any new marine farms will not appear on printed or electronic charts until they are updated, therefore visiting vessels will not be aware that there is a fixed structure in the water, this risk is significantly increased at night. For any structure it is imperative that they it is adequately lit, adequately marked and properly charted. Yachting New Zealand seeks that any new structures are not placed where they will intrude into the path of popular navigation routes.

For all successful marine farm applications Yachting New Zealand seeks to have a bond requirement placed on the applicant.

- A bond requirement will ensure that when a farm outlives its usefulness, lease expires, or the company no longer wished to continue farming that site, that a resource is available to remove all parts of the structure and return the marine coastal area to its natural, pre farm state.

Reducing the value of the New Zealand's cruising grounds through the taking up of space with marine farms has potential to impact the Marine Industry. Many overseas yachts come to New Zealand for its prime cruising waters and will undergo refits and maintenance while here. If New Zealand is a less attractive cruising destination then yacht owners may go elsewhere reducing income in both in the Marine and Tourism industries.

Figures around employment that are regularly published and bandied about by the industry are misleading. Many of these jobs disappear once a farm is built and becomes operational. The industry needs to separate the short term employment numbers building farming structures, and the long term numbers of those that remain as permanent employees.

The benefit of aquaculture growth needs to be considered against the negative impact it could have on tourism and the recreational marine industry in high value areas where tourism is a major economic contributor such Queen Charlotte Sound. In Northland alone tourism brings in approximately \$592 million per annum via 5.451 million visitors with 7114 people employed in the industry. This versus \$19 million a year in revenue, with 336 people employed in aquaculture in Northland (figures sources from the Ministry of Economic Development, Northland Regional Council and Envico).

Yachting New Zealand feels Government (central, regional and local) need to recognise New Zealand's maritime culture and history along with the high recreation value of our coastal marine area. Inshore waters are used by over 450,000 recreational craft.

David Abercrombie

CEO

Peter Vause

Director

Andrew Clouston

Participation and Development Manager

I / we seek the following decision from the NZ King Salmon Board of Inquiry (specify precise details, including the general nature of any conditions or changes sought):

The proposed main plan change NSP 11/03.001 is declined

The proposed plan change NSP 11/03.002 is declined

The concurrent resource consent application NSP 11/03.003 is declined.

The concurrent resource consent application NSP 11/03.004 is declined.

The concurrent resource consent application NSP 11/03.005 is declined.

The concurrent resource consent application NSP 11/03.006 is declined.

The concurrent resource consent application NSP 11/03.008 is declined.

The concurrent resource consent application NSP 11/03.009 is declined.

The concurrent resource consent application NSP 11/03.010 is declined.

The concurrent resource consent application NSP 11/03.011 is declined.

*Please use additional pages if required.*

## Wish to be Heard

Please indicate below whether you would like to speak at a hearing for the NZ King Salmon Proposal. Use a clear tick in the appropriate box below (✓)

I / we **do not wish** to be heard and hereby make my / our submission in writing only (*This means that you will not be advised of the date of the hearing and cannot speak at the hearing*)

I / we **wish** to be heard in respect of my / our submission (to speak at the public hearing) (*This means you can speak at the hearing. If at a later date you decide you no longer wish to speak at the hearing you can withdraw from being heard*)

If others make a similar submission, I / we will consider presenting a joint case with them at the hearing (*This is only for parties wanting to be heard*)



I / we intend to call expert witness(es). Please indicate the disciplines of expected expert witnesses *(If you do not tick this box, you can change your mind later and decide to call experts to give evidence in relation to your submission, provided you do so in time to meet any procedural direction the Board of Inquiry might make)*

The disciplines of my expected witness(es) are:

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**Signature****Date****Signature****Date**

*(Signature of submitter, or person authorised to sign on their behalf is required. Note signature is not required for electronic (email) submissions. If this is a joint submission by two or more individuals, each individual's signature is required.)*

## Additional Important Information

### Information Updates

Correspondence from the EPA to submitters will be sent by email, or hard copy, as noted on the second page of this submission form. Information will also be available on the EPA's NZ King Salmon Proposal website:

<http://www.epa.govt.nz/Resource-management/King-Salmon>