

# Kenepuru & Central Sounds



Kenepuru & Central Sounds Residents Association Inc.

Marlborough District Council  
**Blenheim**

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20 August 2018

Dear Pere/Trevor

## **Aquaculture Review Working Group**

### **1. *Meeting Notes***

- 1.1 Firstly, thank you to Sue for compiling the notes to the 23 July meeting (received 16<sup>th</sup> August 2018) - I know this is a difficult job.
- 1.2 There were one or two important points made at this meeting that are either missed or are mis-recorded in the notes. However, it has consistently appeared to us that perhaps there is more than one set of hands behind the meeting notes and as such we need to accept that they do not necessarily represent context or what was actually said or agreed at meetings. So rather than once again try to correct the record we think it might be more appropriate to take the opportunity to make the general position of KCSRA in relation to the ARWG methodology and processes clearer. This is also timely as the work of the ARWG appears to have (or is about to) finish.

### **2. *Overview of KCSRA Position with ARWG***

- 2.1 From the outset we have rejected the MDC's principle of 'fitting in all existing farms' and the restriction of the group to a 'granular approach'. More particularly, we have objected to the process of using existing farms to inform AMA policy development, and we have objected to a starting position on ecological effects that simply assumes existing farms are appropriate until adaptive management proves otherwise (i.e. 'suck and see'). Our position has always been that we need to identify safe environmental farming levels (i.e. "safe harbour" levels) and work upwards in activity scale as the effects are proven as sustainable.

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

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- 2.2 From early on we have prepared and provided technically focused papers highlighting potentially serious adverse effects from existing farming in the Kenepuru and Central Sounds areas. Our comments in this letter are primarily focused on those at risk areas.
- 2.3 As a result of our (and other members) early objections to how the process was unfolding<sup>1</sup> MDC made it clear to the group that the basis for its principle of ‘fitting all farms in’ was that “*the group is dealing with people’s livelihoods and shouldn’t make adjustments to reduce the existing extent of aquaculture without good environmental justification for doing so*” and, perhaps more pertinently, because of this it was MDC’s view that “*the total level of (existing) development was not in itself sufficient on natural character grounds to require reduction in the current level of marine farming.*”<sup>2</sup> We note that MDC acknowledged at that meeting that it has not undertaken an assessment of the cumulative effects of existing farming on natural character.
- 2.4 MDC duly advised that it will describe the ARWG process as being “*a consultation with industry and community and while there was no consensus the views collated assisted Council by influencing the choices it has made.*”<sup>3</sup>
- 2.5 This is important because we have remained with the ARWG group thus far on the basis we would not be associated with the making of any decision by MDC that was inappropriately driven by these opening MDC positions. Moreover, we have remained in the group in the perhaps vain hope that there would nonetheless be some objective consideration of public values, notwithstanding the MDC’s ‘existing farm’ position. In our view this would have included developing and setting cumulative effects thresholds under NZCPS 7, having regard to the tests in NZCPS 13 and 15 for significant cumulative natural character and landscape effects, and adopting an open minded approach to cumulative ecological effects, such as through using “safe harbour” modelled levels of farming intensity as a base for empirical study. As a minimum we would have anticipated the adoption of an adaptive management regime that at least identifies how the effects of the existing aquaculture activity will be determined and what the acceptable thresholds of effects are.
- 2.6 Notwithstanding periodic suggestions from some members that we have been undertaking a values based approach, the simple reality is that the group has proceeded to be driven by this MDC principle of fitting in all existing farms with any consideration of public values taking a very distant second place. The fact that there has been no consideration of significant landscape or natural character effects from existing farming as required under NZCPS 13 or 15 is testament to that. As is the failure to acknowledge the reality of the NIWA Biophysical Model’s alarming zooplankton depletion predictions - with the only basis for doing so seemingly being the advice from Dr Steve Urlich (dated 7 June 2017) that in our view simply diverts from the question.
- 2.7 I noted at the last meeting (although it is not in the meeting notes) that a MEP that proposes to re-consent 3,000 ha of existing aquaculture on the one hand, but not to consent 1 new ha of further farming on the other without scientific comfort on ecological grounds, cannot be rationalised.
- 2.8 Frankly put, we need to reiterate that we do not wish to be associated with any public suggestion that the ARWG has been anything other than a subjective process driven by the MDC principle of ‘fitting all existing farms in’ come what may.

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<sup>1</sup> Memorandums to the group dated 9 April 2017 and 24 May 2017

<sup>2</sup> Meeting notes of 25 May 2017

<sup>3</sup> Ibid

2.9 It is for this reason that I made it very clear at the last meeting that KCSRA does not want to be involved in the proposed community consultation *unless* (and this is a further correction to the meeting notes):

- The focus is on key issues (i.e. high level), and
- We have a significant hand in setting the process, and
- We have a material hand in drafting any group output to be used in the process, and
- That our views and perspectives of the groups process (i.e. as highlighted in this letter) and MDC's decisions from it (as reflected in the proposed MEP aquaculture chapter provisions) are fairly and clearly articulated, and
- That our reasonable time and costs for participating in the process are paid for.

2.10 If this cannot be accommodated then KCSRA will need to review its position on its involvement in the ARWG.

### 3. *'AMA Smoothing'*

3.1 The original proposal as put to the group was a new band of 100 – 300M (or further if the existing farm already went further). We objected to this early on - on the basis that this invites further sprawl in places where enough is already enough. We were assured that in places where enough was already enough there would be no AMA facilitation made for more. As things progressed the MDC principle of fitting all farms in of course took precedence and proposals to add lines lost within 100M onto the outside regularly ensured even when the farm already extended beyond 300M.

3.2 At the last meeting I recorded my discomfort with any suggestion that KCSRA had agreed to extend any farms beyond 300M where such was only to recover farm space lost in the 50-100M range. My position being that this fundamentally challenges the integrity of the 100-300M band, consistent with what has been a dismal failure of the current MSRMP to protect the integrity of the 50-200M band. We have accepted in some cases that relocating some space to the outside might be a better outcome than where the existing space is – but like any relocation, having lesser adverse effects than somewhere else does not automatically make the new adverse effects acceptable.

3.3 I suggested that there seemed to be a lot of such AMA space (i.e. beyond 300M where there is not currently farming there) showing in the GIS smart map as 'proposed' by the group – i.e. light brown. I was advised that the brown areas beyond 300M where there is not currently farming represent areas where the 'group has agreed' to go beyond the original MDC parameters (presumably by consensus) as per the meeting notes provided.

3.4 As noted, KCSRA has made it very clear that it does not subscribe to any proposal where the only rationale for it is the MDC principle of 'fitting all farms in'. A presumption that we have nonetheless acceded to this by not explicitly reiterating our position every time someone has proposed going beyond 300M to recapture lost space is mis-founded.

3.5 We have not yet had the time to properly review all of the GIS mapping and all of the meeting notes that have been usefully compiled into areas by Sue. We have nonetheless had a preliminary look at the main areas of KCSRA concern, being the Kenepuru and Central Sounds areas, and note that the following farms appear to extend beyond the original AMA parameters when there is in fact *no* suggestion in the notes that this was on group consensus. This is of concern to us.

3.6 Some of the farms at issue are tabulated as follows:

Farm Number	CMU/Location
8485	Kenepuru East
8486	Kenepuru East
8487	Kenepuru East
8490	Kenepuru East
8491	Kenepuru East
8562	Kenepuru East
8565	Kenepuru East
8567	Kenepuru East
8463	Kenepuru West
8464	Kenepuru West
8548	Clova Bay
8556	Clova Bay
8557	Clova Bay
8558	Clova Bay
8264	Clova Bay
8302	Maud
8303	Maud
8315	Maud
8595	Maud
8193	Maud

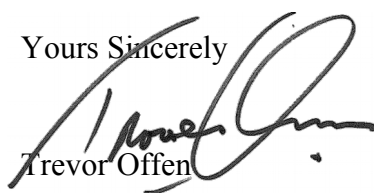
3.7 Our request is that it be made clear in the GIS mapping that to the extent AMAs extend beyond 300M and existing farm area they are only ‘possible’ AMA’s (i.e. *they should all be coloured yellow*) and not ‘proposed’ AMAs - because they are outside of MDC’s base AMA proposal and are *not* agreed to by group consensus.

**4. Other Meeting Note Matters**

4.1 Finally, and for the record, paragraph 5.16 of the 23 July meeting notes should record my message as being that leaving industry and MDC to establish the adverse ecological effects of aquaculture (as critically ineffective as the proposals are) would be like asking a chicken to bring a knife to Christmas.

We welcome any response to the points we make in this letter, and of course await your advice on our position re community consultation as noted at paragraph’s 2.9 and 2.10 above.

Yours Sincerely



Trevor Offen

Marine Committee

Kenepuru and Central Sounds Residents Association Inc