

Kenepuru & Central Sounds



Kenepuru & Central Sounds Residents Association Inc.

Annual Plan submissions
Marlborough District Council
PO Box 443
Blenheim 7240
Email: annualplan@marlborough.govt.nz

Andrew Caddie
President KCSRA
C/- PO Box 5054
Springlands
Blenheim 7241
email: president@kcsra.org.nz
WWW: kcsra.org.nz

6 May 2019

Dear Sir/Madam

Submission Two - Annual Plan 2019 – Funding allocation for restarting much needed monitoring of mussel farming water column impacts on Zooplankton in the Kenepuru /Sound Clova Bay/Craill Bay areas.

This submission to the Marlborough District Council (MDC) on the 2019 Annual is made on behalf of the Kenepuru and Central Sounds Residents' Association.

Background

We are a voluntary community organization with scarce resources that has nevertheless, since 1991, endeavoured to represent the interests of our many members (currently around 280, mainly household, members) on a variety of local issues. Naturally our members have a keen interest in the ongoing sustainability of the marine space ecosystem making up our iconic Sounds.

In last years submission to the MDC Long Term Plan we submitted in support of funding being set aside to research and plug a concerning monitoring gap. Namely the impact of enclosed densely mussel farmed bays in the likes of the Kenepuru and Beatrix Bay complex on the ecosystem within the water column and cessation by MDC of measuring zooplankton levels.

For ease of reference **we attach** that reasonably detailed submission.

Discussion

In both the Long Term Plan documentation and in the supporting documentation prepared and circulated by MDC for the 2019 Annual Plan we were pleased to see a new (and long overdue) focus on environmental issues.

Kenepuru & Central Sounds Residents Association Inc.

President
Vice President
Secretary
Treasurer

Andrew Caddie
Tom Wright
Stefan Schulz

president@kcsra.org.nz
vicepresident@kcsra.org.nz
secretary@kcsra.org.nz
treasurer@kcsra.org.nz

However as far as we can ascertain our earlier submission for an allocated sum to research and address how to go about restarting measuring the adverse impacts of intensive mussel farming on the likes of the zooplankton population in the water column does not appear to have been picked up.

At the hearing we would like to take the opportunity to explain as to why this line of environmental research/monitoring needs to be prioritized over the likes of spending millions on a multi beam survey of the Pelorus and Central Sounds area.

That research is, with all due respect, research looking for a problem to solve.

Further, the multi beam survey in the Queen Charlotte area and the resultant use of the data by the likes of commercial Kina dredge fishers underlines, unfortunately, the dangers of unintended consequences resulting in adverse impacts on the fragile benthic environment.

What we are proposing is research on a clearly identified problem.

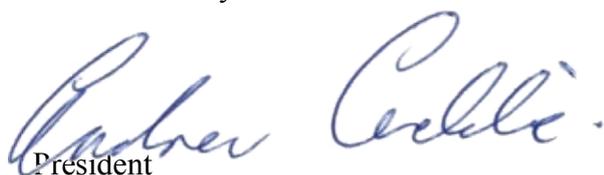
We urge the Council to allocate an additional sum of money to urgently investigate a research program that address's the technical difficulties alluded to by MDC staff and gives priority to empirical scientific work specifically targeted at identifying, through control site studies or otherwise, the impact of intensive mussel farming on zooplankton levels in at risk areas such as the Beatrix Basin and the Kenepuru Sound. We submit accordingly.

Naturally the Association would be pleased to work with the Council's new Coastal Scientist to help make this much needed and pressing research project happen.

Attendance at Hearing

The Associations thanks the Council for the opportunity to make this submission on the Annual Plan. The Association wishes to talk to the above submission at the hearing.

Yours sincerely



President
Kenepuru and Central Sounds Residents' Association

Email: president@kcsra.org.nz.

c/-

PO Box 5054
Springlands
Blenheim 7241

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Kenepuru & Central Sounds Residents Association Inc.

Nicole Chauval
Long Term Plan submissions

Marlborough District Council
PO Box 443
Blenheim 7240

[Email nicole.chauval@marlborough.govt.nz](mailto:nicole.chauval@marlborough.govt.nz)

Andrew Caddie
President KCSRA
C/- PO Box 5054
Springlands
Blenheim 7241
email: president@kcsra.org.nz
WWW: kcsra.org.nz

11 May 2018

Dear Nicole

Submission Three - LTP 2018 – Funding allocation for restarting much needed monitoring of mussel farming water column impacts on Zooplankton in the Kenepuru /Sound Clova Bay/Craile Bay areas.

This submission to the Marlborough District Council (MDC) Long Term Plan review is made on behalf of the Kenepuru and Central Sounds Residents' Association. We are a voluntary community organization with scarce resources that has nevertheless, since 1991, endeavored to represent the interests of our many members on a variety of local issues.

Background

A few years ago members became concerned at the seemingly endless tide of marine farm applications in the Kenepuru and Pelorus Sounds without regard to the varied cumulative adverse impacts on what is often referred to as a unique and iconic New Zealand environment. We decided to make a principled evidence based stand.

Consequently the Association has built up a sound knowledge and understanding of issues concerning the unsustainability of some marine farming in the Sounds. Most notably the Association has identified particularly egregious mussel farm applications and successfully opposed them at Commissioner led hearings. The Association has then participated in successfully opposing appeals to the Environment Court (and beyond) by those unsuccessful mussel farm applicants.¹

¹ *RJ Davidson Family Trust v Marlborough District Council* [2016] NZ EnvC 81, *Clearwater Mussels Limited & KJB Marine Farms Limited v Marlborough District Council* [2016] NZ EnvC 21 .

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|---------------------------|---------------|
| President | Andrew Caddie |
| Vice President | Tom Wright |
| Secretary | |
| Treasurer | Stefan Schulz |
| Chairman Roding Committee | Robin Bowron |

| |
|--|
| president@kcsra.org.nz |
| vicepresident@kcsra.org.nz |
| secretary@kcsra.org.nz |
| treasurer@kcsra.org.nz |
| roading@kcsra.org.nz |

The Association has also made some ground in leading the discussion with Council, Industry and MPI on how to best identify and monitor adverse ecological effects from densely packed mussel farms in at risk bays and Sounds.

A significant development in highlighting this issue was the recent (2015) MDC commissioned biophysical Pelorus study from NIWA. The results from the NIWA modeling strongly supports the Association's concerns as to the likely disruptive biological effects of intensive mussel farming in at risk bays such as Beatrix Bay and Kenepuru Sound.

In another appeal to the Environment Court by an unsuccessful applicant for a mussel farm in Beatrix Bay the appellant saw fit to subpoena one of the lead NIWA authors of this study in order to table the model before the Court and have the author answer questions.

Naturally the Association took the opportunity to burrow into and analyse the model's outcomes, notably the cumulative adverse impact of existing mussel farms on key biological indicators in Beatrix Bay.

The NIWA witness, on oath and in a specialist court of record where cross-examination is permitted, confirmed the Associations interpretation of the NIWA models results was correct.

The Association is thus particularly concerned at the NIWA models findings that in comparing the results from scenarios of with and with out mussel farm scenarios there is a massive depletion of a very important part of the primary ecosystem – zooplankton - in densely farmed Sounds and bays such as the Kenepuru Sound.

This result has created some consternation among scientific advisers. Unfortunately their reaction has been to distance themselves from the unpalatable conclusion that mussel farming in the likes of the Kenepuru is likely exceeding safe ecological carrying capacity and a prudent precautionary approach should be looking to a reduction in farming intensity. Or at the very least no more new or extensions to existing farms till this matter is addressed by identifying the levels of zooplankton depletion that is currently occurring.

Difficulties of a technical nature have been raised around identifying and monitoring the very important zooplankton levels.

For example we note a recent report by a Technical Advisory Group convened by Council for the purpose of advising the MDC Aquaculture Working group who are looking at aquaculture issues in the context of the Marlborough Environment Plan. This report noted that the Council **has ceased zooplankton sampling** due to perceived technical difficulties, but that zooplankton may be a future indicator pending new cost effective monitoring technologies.

The Long Term Plan Consultation Document

Accordingly, the Association was very pleased to see the Mayor's press release that environmental issues would be to the fore in the Long term Plan Review. We were pleased to see some talk of budgeting for increased monitoring.

However the Association is a little disappointed that the allocation for funding for environmental monitoring does seem to not expressly address this vital, basic and known issue. Compare the express allocation of **three million dollars** allocated from Council Reserves for the multi beam survey of the seabed in the Pelorus.

We urge the Council to allocate an additional sum of money to urgently investigate a research program that address's the technical difficulties alluded to above and gives priority to empirical scientific work specifically targeted at identifying, through control site studies or otherwise, the impact of mussel farms on zooplankton levels in at risk areas such as the Beatrix Basin and the Kenepuru Sound. We submit accordingly.

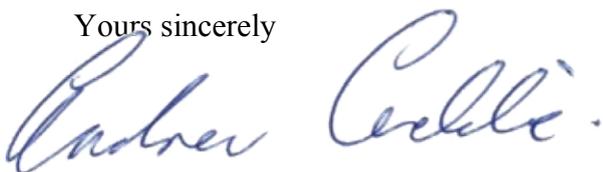
At the hearing we would be pleased to suggest ways where significant funding could easily be made available for this project. Alternatively an allocation could come from Council reserves.

Naturally the Association would be pleased to work with the Council's Coastal Scientist to help make this much needed and pressing research project happen.

Attendance at Hearing

The Associations thanks the Council for the opportunity to make this submission on the Long Term Plan. The Association wishes to talk to the above submission at the hearing.

Yours sincerely



Andrew Caddie
President
Kenepuru and Central Sounds Residents' Association
c/- PO Box 5054, Springlands, Blenheim 7241
email: andrew.caddie@xtra.co.nz