

Hearing Submission and Evidence – MEP Variation 1A - On behalf of KCSRA, CBRA and Guardians.

On 23 February 2021 KCSRA made an extensive submission on the proposed Variation 1A – Finfish Farming publically notified on 2 December 2020. However a review of the relevant Section 42A reports shows, we submit, that little of substance seems to have changed.

Today on behalf of the above grouping of local concerned community organisations two representatives of KCSRA will provide a brief commentary on why we feel the Panel should put to one side some of the recommendations of the authors of the Section 42A report for Variation 1A.

Our primary focus is on highlighting the evidentiary basis as to why the Council erred in deciding to adopt some of the recommendations of the July 2017 report of the Marlborough Salmon Farm Relocation Advisory Panel. In particular, the recommendations of that panel concerning the proposed creation of two new Finfish Aquaculture Marine Areas (**FAMA**) in the Waitata Reach of Pelorus Sound. These are proposed to be located at Horseshoe and Richmond Bay.

Speakers today will be Andrew Caddie and Hanneke Kroon.

I am the President of the Kenepuru and Central Sounds Residents' Association (KCSRA). The Association was incorporated in 1991 and currently has around 300 members (mainly household) who predominately reside full or part time in the Kenepuru Sound and Central Pelorus. I have been on the committee of KCSRA since 2010 and I am in my fourth year as President.

In terms of my professional background I hold two tertiary qualifications - a Bachelor of Forestry Science and a LLB, both from Canterbury University. I was a forester for a number of years with the then NZ Forest Service. Following a period of OE I obtained my LLB and practised law as a commercial solicitor for a many years at various large National legal firms. Since 2012 I have been exposed to some of the intricacies of the RMA in the context of contesting inappropriate development in the unique and iconic marine area of the Sounds.

With me today is Hanneke Kroon, a much-valued member of my committee. Hanneke and her husband (Joop) live permanently in Elie Bay in the Pelorus Sound since February 2012.

Hanneke completed a Master's of Science degree in Electrical Engineering at Twente University in the Netherlands, being the only female student in the Electrical engineering department at that time. Hanneke worked as a computer specialist in the field of Automation and Control of factory processes, travelling worldwide and honing her analytical and IT skills.

Hanneke and Joop have sailed their own Yacht extensively over many of the planets oceans since leaving the Netherlands in 1991. On these voyages Hanneke has become well aware of the many serve environmental challenges that our seas and oceans face.

Hanneke was a submitter in the Board of Inquiry process, when New Zealand King Salmon (NZKS) applied for nine new salmon farms. In 2016 Hanneke represented KCSRA the on the Marlborough Salmon Relocation Working Group. Hanneke was a liaison person for MPI Biosecurity during the 2015 NZKS salmon mortality response. Hanneke has also written extensively on NZKS salmon farming efforts.

Policy 13.21.7 of Variation 1 A

This is the policy via which the Council proposes to create the two new FAMA's. One at the entrance of Horseshoe Bay the other at the southern entrance of Richmond Bay. These are to be offered to NZKS a farmer of King Salmon (sometimes referred to as Chinook salmon or *Oncorhynchus tshawytscha*). In "exchange" NZKS will no longer be authorised to farm finfish at its Waihinau Bay salmon farm also in the Pelorus Sound. The so-called "relocation".

I stress that we will be skipping over much of the detail as to how KCSRA has built up this hard won expertise as to the unsustainability of salmon farming in the Pelorus as that is set out in our original submission.

A primary driver for our principled evidentiary led opposition is that sea water temperatures in these areas are unsuitable (too warm, too often, for too long) for the sustainable farming of King Salmon. In short the two selected so-called relocation sites now proposed by the Council in the Pelorus **are inappropriate** and should not be authorised.

Unfortunately the 2017 Advisory Panel report the Council relies on in advocating for the two new Pelorus sites chose to ignore the adverse thermocline evidence and its resultant significant adverse impacts on the environmental sustainability of these sites.

The Section 42A reporters, when reviewing submissions, in turn have decided to ignore the latest evidence as to long-term sea temperature changes in the Pelorus we presented in our submissions, instead relying on the report of 2017. Accordingly, we believe this aspect must, for the benefit of the Panel, be highlighted today.

To this end, Hanneke has prepared a number of Power Point Slides and will briefly traverse the same setting out for the benefit of the Panel the evidentiary basis of our submission on this aspect.

Hanneke will lay out for you the empirical evidence as to past and future sea temperatures trends in the Pelorus, the links between unsustainable salmon mortality levels and disease in the NZKS Pelorus farms and what that looks in practice.

In the interests of time I do not intend to traverse why and how this issue relates back to the requirements of the RMA and the New Zealand Coastal Policy Statement (NZCPS) but instead point you to the discussion in our original submission at the likes of Section 9 page 10 (Part 2 of the RMA) and Section 10 (Objective 6 and Policy 8 of the NZCPS).

However, If time permits we may touch on some other aspects of proposed Variation 1 A and the Section 42 A report eg Policy 13.22.10



Andrew Caddie
President KCSRA
25 October 2021