

In the Matter of application U190438 by the NZ King Salmon Company Ltd for Coastal Permit (Marine Farm) – North of Cape Lambert, North Marlborough

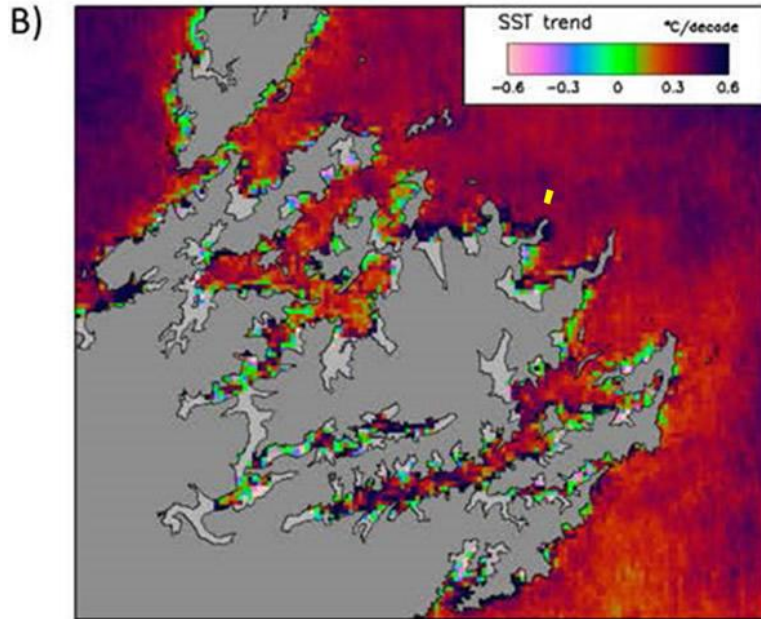
Kenepuru and Central Sounds Residents' Association

15 July 2022

Response to Minute 20 and Minute 21 of the Hearing Commissioners – NZKS revised proposed conditions for comment

1. Thank you for the opportunity to comment further on the NZKS latest set of proposed consent conditions as received on 4 July 2022.
2. It is always difficult for submitters opposed to an application (as is KCSRA) to engage on a set of proposed conditions, as that seems to create the perception we are comfortable if the application is granted. We reiterate our opposition to the grant of this application and for completeness sake refer the Commissioners to our earlier response on the then set of proposed conditions dated 31 March 2022.
3. We are disappointed to find no movement or consideration by NZKS on two key condition aspects, namely the length of the term and any clarification as to the operational treatment of the more likely than not large volumes of salmon mortalities should this application be granted and implemented.
4. We have consistently argued and presented evidence in our original submission and at the hearing that a term of 35 years is too long as the area is unsuitable for salmon farming on many counts, particularly with regard to the sea temperatures that are currently being experienced at the proposed site. Further, there is the irrefutable upward trend for such sea temperatures over such a long time frame. For ease of reference we attach below Figure 4 taken from a recent NIWA paper, which we presented to the panel earlier.¹

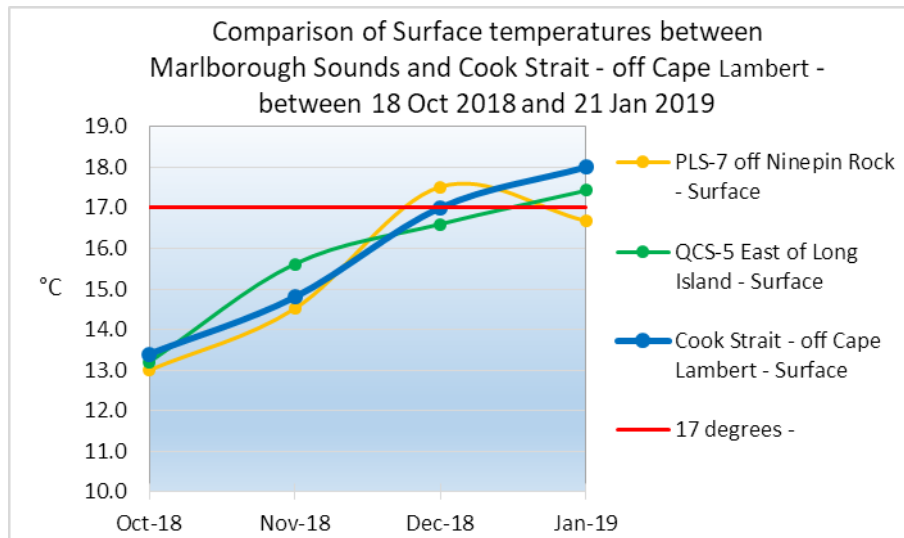
¹ Niall Broekhuizen, David R. Plew, Matt. H. Pinkerton & Mark. G. Gall (2021) Sea temperature rise over the period 2002–2020 in Pelorus Sound, New Zealand – with possible implications for the aquaculture industry, New Zealand Journal of Marine and Freshwater Research, 55:1, 46-64, DOI: 10.1080/00288330.2020.1868539.



5. In short, this work studied the changing temperatures of the Marlborough Sounds and Cook Strait over time and made predictions as to likely further temperature increases per decade. At the location of the proposed site the authors suggest an increase of 0.4 to 0.5 degrees centigrade every ten years.

6. We also presented evidence to the Commissioners as to our detailed monitoring of sea temperatures in the Pelorus Sound in the context of existing NZKS operations in that area and the impact of these temperatures on salmon mortalities.

7. Unfortunately the evidence as to the temperature profile at the proposed site by Cawthorn on behalf of the applicant – due to operational extingences – only covered the period up to January 2019. We supplied to the Commissioners a comparison of the sea temperatures in the Pelorus Sound areas against the Cawthron data. Again for ease of refernce we attach the graph we supplied which shows a very high degree of correlation as to the Cook Strait and Marlborough Sounds temperature profiles.

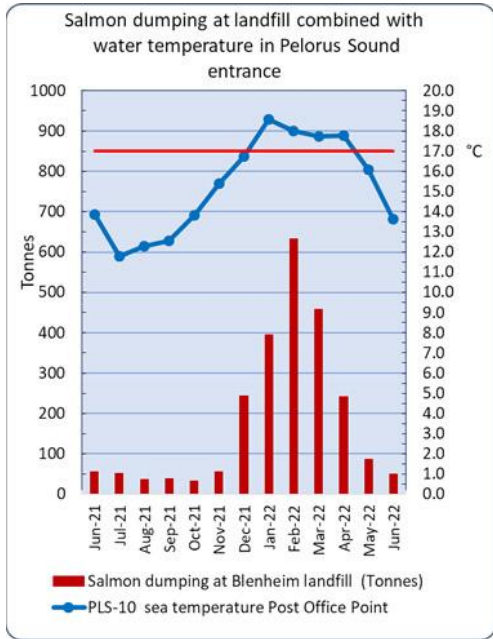


8. In the context of current sea temperatures and the evidence as to likely sea temperature trends we respectfully suggest it is inappropriate to grant a term of 35 years, and reiterate our view that a 15 year term is more appropriate.

9. Based on the temperature evidence supplied it is true that we are not surprised that our monitoring revealed yet another elevated mortality spike at the existing NZKS farms over the usual warmer sea temperature period of December 2021 to April 2022.

10. In the face of this event and the close correlation of Cook Strait and Marlborough Sounds temperature profiles we are surprised that we were unable to locate any detail in the revised set of conditions from NZKS as to exactly how it will deal with and report to the Council such mortality spikes should the application be granted. This is an area that must be rectified.

11. To illustrate the size of the likely problem we attach below a graph of water temperature recorded by Council at the entrance of Pelorus Sound and Council supplied figures of salmon mortalities dumped at the Blenheim landfill. In the period December to April nearly 2000 tonnes!



11. In summary, we submit that no amount of revised (or not) consent conditions will turn this into an appropriate site for salmon farming. The application should be declined.

Yours Sincerely

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