

NEW ZEALAND MARINE SCIENCES SOCIETY

TE HUNGA MĀTAI MOANA O AOTEAROA



Aquaculture Unit
Ministry for Primary Industries
Private Bag 14
Port Nelson 7042

8 August 2017

Submission on the Proposed national environmental standard for marine aquaculture

This submission is made on behalf of the membership of the New Zealand Marine Sciences Society (NZMSS). It is made in good faith in my role as President of the NZMSS and in accordance with the Code of Ethics and Rules of the Royal Society of New Zealand.

NZMSS commends the Ministry for Primary Industries for initiating this important process of developing a national standard for marine aquaculture in New Zealand.

Please contact me at the email address provided below for any further information regarding this submission.

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New Zealand Marine Sciences Society submission on the proposed national environmental standard for marine aquaculture

The New Zealand Marine Sciences Society (NZMSS) welcomes the opportunity to comment on the proposed national environmental standard for marine aquaculture (NES: Marine aquaculture).

The NZMSS is a non-profit incorporated society. It was formed in 1960 as a constituent society of the New Zealand Royal Society to encourage and assist marine science and related research across a wide range of disciplines in New Zealand and to foster communication among those with an interest in marine science. NZMSS membership covers all aspects of scientific interest in the marine environment and extends to the uptake of science in marine policy, resource management, conservation and the marine business sector. We speak for members of the society and we engage with other scientific societies as appropriate.

The NZMSS is supportive of the objective to develop a new planning framework for the management of existing marine farms within environmental limits and implement a nationally consistent framework for biosecurity management on all marine farms. We recognise the risks associated with the spread of non-indigenous species (NIS) and agree that all marine farms should be required to prepare, implement and regularly update Biosecurity Plans. We suggest that, given the potential harm caused by some NIS, implementation of the Biosecurity Management Plans should be advanced from 2025 to 2020, at the latest. The NZMSS is concerned at the rapid spread of some NIS, in particular, *Styela clava* (clubbed tunicate), *Sabella spallanzanii* (Mediterranean fanworm) and *Eudistoma elongatum* (Australian droplet tunicate), which the NZMSS understands have spread to and now infest a number of marine farms in the Northland, Auckland and Waikato regions. These examples alone highlight the importance of having plans in place to reduce the further spread of these species and to ensure new NIS are quickly detected and contained, or preferably eradicated.

The proposed Biosecurity Management Plans will support better management of existing farms as they become re-consented; however, to achieve effective biosecurity management, consistent approaches across all marine farms would be favourable. We therefore recommend MPI considers options for broadening the scope of the NES in respect to managing biosecurity to all marine farms, not just those going through a re-consenting process.

We have concerns relating to the lack of notification for a change of species as part of replacement consent applications. Species may have specific requirements and aquaculture methods may differ resulting in changed environmental effects. In particular, we suggest greater restrictions on category 3 and 4 changes.

The proposed NES will reduce the ability of iwi, stakeholders and the community to comment on and appeal replacement consent applications. Public notification and/or discretionary activity status should be considered for supplementary-fed farms and farms within or adjacent to areas of outstanding natural landscapes, outstanding natural character or outstanding natural features. While realignment may still be notified under the requirements of the Resource Management Act (RMA) or coastal plans, the current proposal reduces the ability of the public to engage in discussion.

As well as farms within outstanding areas, we think additional matters of discretion are needed for farms adjacent to outstanding areas. It will be important to ensure that farms adjacent to outstanding areas do not impact on the values of those outstanding areas (e.g. a salmon farm near an island that is considered to be an outstanding natural landscape).

The NZMSS is of the view that more guidance is needed for assessing the environmental effects from marine farming (Appendix G), particularly those proposed to be subject of discretion for replacement consents for existing farms. The limited availability of guidelines, acceptable environmental levels, consistent methodologies and general best practice is creating uncertainty for all involved, frequently leading to prolonged and expensive processes that create difficulties for all parties. Such guidance would also be beneficial for newly consented marine farms, thus creating benefits beyond the narrow scope of the NES.

The NZMSS strongly recommends adding effects on water quality to the list of effects that should be subject to matters of discretion for replacement consents for existing farms. Issues relating to water quality are of concern to most stakeholders, including marine farmers themselves as their activity depends on suitable water quality.

We have some concerns about farms that were originally consented under the Marine Farming Act 1971. At that time, little was done to assess whether these sites were suitable for aquaculture. If these farms have been assessed under the RMA since their original consent and shown to be suitable for aquaculture then re-consenting of those farms could be considered a restricted discretionary activity. If this has not been demonstrated, these farms need to be fully assessed for their environmental impacts before they can be re-consented.

A 10-year minimum between realignments is not long enough to avoid 'creep' of farms. A one-off realignment would be appropriate given the better environmental monitoring in place now and recognising that farms may not have been originally placed in the best areas. But once that realignment has taken place we do not see a need to keep allowing further realignments.

It would be preferable for areas to be managed in a holistic way, as a zone rather than on a farm by farm basis (e.g. areas zoned for aquaculture in Tasman and Waikato). This forward-thinking approach allows for adaptive management and management of cumulative effects.

We agree that there are sites that should be recognised in the proposed NES because of their particular importance to aquaculture. The Wainui Bay spat catching site is a good example as it has a disproportionate importance as one of a few spat catching areas in NZ.

We hope that the comments above will help the Ministry take a science-based approach to the development of the NES.