



ENVIRONMENT AND CONSERVATION ORGANISATIONS OF NZ INC.

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The EPA Inquiry
New Zealand King Salmon Proposal
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The New Zealand King Salmon Co. Limited
c/- Russell McVeagh
P.O. Box 10-214
Wellington 6143
Attention: James Gardner-Hopkins

Email: King Salmons Lawyer james.gardner-hopkins@russellmcveagh.com

Submission on King Salmon Proposal under the Resource Management Act

Introduction

1. This submission **opposes** the whole of the application both the resource consent and plan change proposals.
2. This submission is on behalf of the Environment and Conservation Organisations of NZ (ECO) which is the national alliance of 55 groups with a concern for the environment. ECO has been involved in issues of marine and oceans policy since its formation 40 years ago. This submission has been prepared by members of the ECO Executive and is in line with ECO Policy that was developed in consultation with ECO member bodies and endorsed by our AGM.

Main Points in support of this submission are:

3. This proposal is contrary to the provisions of sustainable management under Part II of the Resource Management Act.
4. The proposal is contrary to the principles and purposes of the Resource Management Act.

5. The proposal is contrary to integrity of the Marlborough Resource Management Plan which went through wide public consultation and consideration by the Environment Court.
6. The application is in areas where marine farming is a prohibited use in the Marlborough Resource Management Plan.
7. The proposal involves major pollution from the discharge of contaminants including imported fish feed and concentrated pollution from the farm.
8. The proposal increases the risk of nitrification and eutrophication of the Marlborough Sounds.
9. The proposals impacts of threatened and rare species including the King Shag which is only found in the Marlborough Sounds, and Hector's dolphins.
10. There has been inadequate consideration of the cumulative effects of the proposal and other discharges into the sounds including sewage.
11. The proposal has adverse effects on an area of outstanding natural character and outstanding landscape.
12. The proposal is not a proposal of national importance - it has only private benefit for New Zealand, there are no resource rental or equivalent coastal charges for the occupation of that space.

Summary of Additional Points

13. The proposals would involve occupying space in the coastal environment where there are no resource rental or equivalent coastal charges for the occupation of that space.
14. We wish the King Salmon Board of Inquiry to make the following decision: **decline the application in its entirety – both the Proposed Plan Changes and the Resource Consent proposals**
15. ECO wishes to be heard in support of our submission.
16. ECO is not a trade competitor to NZ King Salmon.
17. Furthermore, to reduce cost, carbon use, and inconvenience to all parties, we ask that we can present our evidence by teleconference or skype.
18. **Please contact Barry Weeber at ECO PO Box 11-057, Wellington. Email: eco@eco.org.nz**

Yours sincerely

Barry Weeber,
Co-Chairperson.