

**From:** Peta Brunel  
**Sent:** 11 Nov 2013 12:08:19 +1300  
**To:** Bruno Brosnan-5050  
**Subject:** NZ King Salmon - Crail Bay

Hi Bruno,

Thanks for meeting with me on Thursday.

I said in our meeting that I would briefly outline why we are proposing the changes to the structures on MFL048 as a s 127 application, rather than a fresh consent application under s 88. Very briefly:

- Unlike some of NZKS's other low flow farms, consent U090660 on MFL048 provides a single overarching consent for the structures, occupancy, activity and discharge associated with farming salmon on the site. The underlying MFL only regulates mussel farming activity.
- The changes now proposed are relatively minor in the context of the wider consent, affecting only the conditions relating to structures and EQS (conditions 4 and 19 to 22). There are no changes proposed to feed discharge levels, staging, overall occupancy, or activity on the site.
- In those circumstances, the change doesn't give rise to a materially different activity to the degree which justifies an application under s 88. Given the matters concerned are already regulated in U090660, it is preferable to maintain a single consent, rather than a layering of multiple consents which could give rise to confusion.
- It will still be open to the Commissioner who hears the application to determine it as a fresh consent application if he/she thinks necessary.

Any application for an on-site barge will proceed as a separate s 88 application.

As discussed on Thursday, we would also be interested in any update to the list of potentially affected parties provided by the council last year.

Happy to discuss or provide further detail if need be.

Kind regards  
Peta.



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