

29 February 2016

Marlborough District Council
PO Box 443
BLLENHEIM 7240

Attention: Dr Steve Ulrich

Dear Steve

2015 Annual Monitoring Reports for Waihinau, Otanerau, Forsyth, Ruakaka and Clay Point

I attach a copy of the 2015 monitoring reports for all farms. Overall, the results are very similar to 2014. This letter outlines our interim decisions on farm management as a result of the reports, and we welcome any comments.

Interpretation of Results – Benthic

The table below gives a summary of compliance with seabed monitoring conditions. An outline of how results should be interpreted was set out in a letter from Gascoigne Wicks to Andrew Besley on 30th October 2013. A further copy of that letter is attached.

It is critical for each report to be read as a whole. The approach taken to monitoring the seabed looks at a series of environmental indicators, and weighs them according to their importance. The same weighting has been applied as in 2013.

Farm	Pen	Middle Zone	Outer Zone
Otanerau	Compliant	Compliant	Compliant
Ruakaka	Compliant	Compliant	Compliant
Waihinau	Compliant	Not monitored in 2015*	Compliant
Forsyth	Elicits management response	Compliant	Compliant
MFL048	Site not used in 2015**	Site not used in 2015**	Site not used in 2015**
MFL032	Site not used in 2015**	Site not used in 2015**	Site not used in 2015**
Clay Point	Compliant	Potential Issue at 90m E boundary	Elicits management alert - E
		Compliant W	Compliant W

* Consistent with the Annual Monitoring Plan and Best Management Practice guidelines.

**NZ King Salmon has obtained a variation to the consents applying to these sites. As a result, annual monitoring and reporting is not required while the sites are not in use.

The results overall suggest the seabed is similar to previous years. Proposed management responses for the farms are addressed below.

Forsyth

The Forsyth site was used in 2015 to take fish destined for the new Waitata site. These fish were introduced as smolt in May and held on site for longer than was originally anticipated.

The Forsyth site is currently fallowed and there are no plans for the site to be used over the next 12 months. Therefore, in line the Crail Bay sites and BMP guidelines, we suggest monitoring be limited to prior to re-establishment of the site to ensure the seabed is able to assimilate the proposed discharge and remain within the required EQS standard. This will require a variation to consent. Alternatively a much reduced monitoring programme, agreed with Council, could be undertaken.

Ruakaka

Cawthron recommend a follow up survey for the Ruakaka site and higher replication or archive sampling as per the BMP guidelines for the next annual monitoring. We will liaise with Cawthron to carry out a follow up survey.

Operational constraints mean we are currently unable to cease production on that site even for a short period of time. However, we have altered our rearing strategies and anticipate there will be less feed used during 2016.

Otanerau

The Otanerau farm was relocated over an already heavily impacted area at the northern end of the consented surface structure area. The pens will be moved to be located at the southern end of the consented area for 2016.

We agree to monitor at level 3 with two additional replicate samples from net pen stations at the next monitoring round as per Cawthron recommendations.

Clay Point

Similar issues have been observed in the 2015 monitoring report identifying the 90mE boundary at Clay Point. The 300mE boundary is consistent with the required ES within the margin of error. These are very similar results to those observed in 2014.

We have identified that a move approximately 100m south toward the Tory Channel would be beneficial in improving the environmental effect as currents further south are higher. This move is currently under assessment.

Cawthron recommend collecting extra samples at the next monitoring round, and we will liaise with Cawthron to do this.

Interpretation of Results – Water Column

The water column results at all farms suggest there are no compliance issues.

Interpretation of Results – Copper and Zinc

We continue to monitor copper and zinc concentrations beneath all farms annually; however consents do not set any levels of maximum impact.

Copper antifoul has not been used on these sites for several years, so it is unexpected to see the elevated level at Otanerau exceed ANZEC ISQG-high. As above we have agreed to increase metal monitoring on this site for 2016.

In 2012 NZKS switched to the use of organic zinc on all farms, which is intended to reduce zinc inputs into the environment long term. However, in 2015 zinc levels above ISQG-high guidelines were again identified at Otanerau.

At Forsyth and Waihinai zinc levels were above ANZEC ISQG-low.

Yours sincerely



Mark Gillard

Environmental Compliance Manager