

**From:** Gina Ferguson-7541  
**Sent:** 14 Aug 2017 17:44:48 +1200  
**To:** Peter Johnson-5472; Steve Urlich-8309  
**Subject:** RE: Proposed change to NZKS MEM-AMP

Hi Peter,

There is currently a lack of consistency with condition 66(c) and 66(e), whereby monitoring requirements under 66(c) can be adjusted by the peer review panel however in 66(e) such an adjustment by the peer review panel is not provided for.

I would support a variation to provide a more consistent approach and ability of the peer review panel to make such adjustment to the MEM-AMP, recommend including reference to in accordance with condition 70(c) as stated in 66(c).

Regards,  
Gina

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**From:** Peter Johnson-5472  
**Sent:** Monday, 14 August 2017 4:38 p.m.  
**To:** Steve Urlich-8309; Gina Ferguson-7541  
**Subject:** Proposed change to NZKS MEM-AMP

Hi Steve and Gina,

Please see the attached application from NZKS for a change of conditions on their Waitata, Kopaua and Ngamahau farms.

The proposal is to change Condition 66e to provide more flexibility in the MEM-AMP around water quality monitoring. The proposed change is in red underline below:

66. The MEM-AMP shall include the following monitoring:

e. Targeted water column surveys to quantify the localised effect of the marine farm on surrounding water quality, for the purpose of obtaining information regarding marine farm-specific, near-farm mixing properties in order to provide a context for evaluating compliance with the EQS – WQS in condition 44. This shall involve a series of fine-scale surveys in the vicinity of the marine farm (within 1km from the net pens) measuring: salinity, clarity, temperature, chlorophyll *a*, turbidity, dissolved oxygen (DO), nutrient concentrations (NH<sub>4</sub>-N, NO<sub>3</sub>-N, NO<sub>2</sub>-N, DRP, Si, TN and TP), phytoplankton composition and biomass along transects that move away from the marine farm and span potential nutrient gradients. The surveys shall be undertaken at least twice per year and continued for at least two years after the marine farm has reached stable maximum feed discharge levels and no future increases are proposed. With respect to the monitoring objective, the monitoring approach may be adjusted over time in accordance with the written recommendation of the Peer Review Panel.

I'm not particularly familiar with the conditions on these three farms, or how the Peer Review Panel operates. While at first glance the request seems reasonable, it may have potential implications for matters I'm not currently aware of. I'd be grateful for your response to the proposed change of condition, preferably by the end of August.

Thanks,  
Peter