

MEMO

File Note: U190438

To: Peter Johnson, Resource Management Officer.

From: Jono Underwood, Biosecurity Manager

Date: 21 August 2019

Subject: NZKS Offshore Salmon farm application - Biosecurity report

Purpose

To provide technical advice in response to your email request of 8 August 2019.

Questions

You have asked for a view on the biosecurity report whether it adequately identified and addresses the relevant issues and what respects (if any) Council should consider requesting an independent peer review of the report.

Background

Biosecurity risks cut across many areas of this application. This includes the risks associated with the transfer and/or exacerbation of marine pests such as fouling species and also any risks associated with diseases associated with salmon.

It needs to be noted that in accordance with the NZ Coastal Policy Statement (NZCPS) 2010 Policy 12, harmful aquatic organisms are those that may... "adversely affect the environment or biological diversity, pose a threat to human health, or interfere with legitimate use or protection of natural and physical resources in the coastal environment." It can be argued that addressing disease biosecurity risks associated solely with farmed salmon, where there is no risk to other pelagic species, falls outside the scope of this definition and is a primary production matter. However, good practices on-farm should still be maintained in the event of a novel threat coming to Marlborough or New Zealand.

Undertaking a critique relating to disease biosecurity risk, such as those relating to disease threats, is outside my area of expertise. The disease risk assessment report¹ submitted, in general, goes into this aspect of biosecurity risk in great detail and in my opinion, seems to be a thorough and robust assessment. A peer review of this report may provide further technical insight, if this is seen as being necessary.

Comment

The following comment relates to the submitted biosecurity report² only.

- The report adequately identifies the issues that could be associated with the creation of the salmon farming site. It also provides a great deal of valuable context in relation to relative risk. That is, the risk from the proposed structure in relation to the background level of existing structures in the coastal marine area.
- The report accurately reflects the level of risk associated with the introduction of harmful marine organisms from other parts of New Zealand into Marlborough, sitting predominantly outside of the proposed activity. Nonetheless, should an incursion occur in the future, the activities of those that may occupy marine space or operate in the marine environment can have a big impact on within-region spread. This directly relates to the NZSCP 2010 and the implementation of appropriate biosecurity practices with such an activity.
- The risk identified in relation to creating new artificial structures acting a reservoir for harmful aquatic organisms is an accurate assessment. Mitigation measures identified under section 5.3 are key measures with respect to this risk and needs to be prominent in any potential biosecurity management plan and/or consent condition.

¹ Diggles B 2019. Disease Risk Assessment Report – Open Ocean Salmon Farms near Marlborough Sounds, New Zealand. Prepared for New Zealand King Salmon Company Limited. DigFish Services Report: DF19-01. 97 p.

² Fletcher L 2019. New Zealand King Salmon Company Limited: Open Ocean Farm Assessment of Environmental Effects - Biosecurity. Prepared for New Zealand King Salmon Company Limited. Cawthron Report No. 3222. 33 p.

- Within the biosecurity report, other legislative instruments were correctly identified in relation to the inward movement of vessels or other moveable craft. These are for both movements across the NZ border directly into Marlborough (Craft Risk Management Standard for Biofouling, Import Health Standard for Ballast Water) and also inter-regional movements (Regional Pest Management Plan in relation to biofouling). Duplication with these instruments is suggested to be avoided although reference to them could certainly be beneficial.
- I cannot see any respects in which Council would consider an independent peer review of the report.

Please let me know if you wish to discuss anything associated with these comments.

Jono Underwood

Biosecurity Manager

Peter Johnson-5472

From: Peter Johnson-5472
Sent: Thursday, 8 August 2019 12:38 PM
To: Jono Underwood-7595
Subject: U190438 - NZKS - Biosecurity
Attachments: NZKS - U190438 - Biosecurity Report.pdf

Hi Jono,

As discussed, I attach the submitted biosecurity report concerning the proposed 1791 hectare salmon farming site at north Marlborough. There is a separate fish disease risk assessment in Appendix L of the application in record number 19153857.

I'd be grateful for your view on whether the biosecurity report adequately identifies and addresses the relevant issues, and in what respects (if any) Council should consider requesting an independent peer review of the report.

If you can give me any comments you wish to make by the end of August that would be ideal.

Thanks,

Peter Johnson
Senior Resource Management Officer
Marlborough District Council