

**From:** Mark Preece  
**Sent:** 5 Sep 2019 10:54:31 +1200  
**To:** Claire Frooms-8094  
**Subject:** RE: BOI sites MEMAMP  
**Attachments:** PRP 2019 Comments for the Annual Monitoring Reports - KOP final.pdf

Hi Claire

Please see the attached – I'll double check our website, and if it's not there I'll re-prompt to get it up.

thanks

From  
Mark

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**From:** Claire Frooms-8094 <Claire.Frooms@marlborough.govt.nz>  
**Sent:** Thursday, 5 September 2019 10:44 AM  
**To:** Mark Preece <Mark.Preece@kingsalmon.co.nz>  
**Subject:** RE: BOI sites MEMAMP

Good Morning Mark,

Thanks for the peer panel review comments relating to Waitata and Ngmahau.

Are you able to please provide me with the Kopaua peer review panel comments as well? I still haven't been able to locate them on your website – can you please send me a link?

With thanks,

**Claire Frooms**  
Environmental Protection Officer



Phone: 03 520 7400

15 Seymour Street, PO Box 443  
Blenheim 7240, New Zealand  
[claire.frooms@marlborough.govt.nz](mailto:claire.frooms@marlborough.govt.nz)  
[www.marlborough.govt.nz](http://www.marlborough.govt.nz)

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**From:** Mark Preece [<mailto:Mark.Preece@kingsalmon.co.nz>]  
**Sent:** Thursday, 8 August 2019 10:10 AM  
**To:** monitoring  
**Subject:** RE: BOI sites MEMAMP

Hi Claire

Thanks – please see attached the PRP comments for Waitata. These will be loaded on our website as well.

Thanks

From  
Mark

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**From:** monitoring  
**Sent:** Monday, 5 August 2019 10:27 AM  
**To:** Mark Preece  
**Subject:** RE: BOI sites MEMAMP

Good morning Mark,

Thank you very much for sending through this MEMAMP, please take this as confirmation it has been received.

I see that condition 72 of resource consent U140294 (Waitata) requires copies of the Peer Review Panel to be provided to Council as well as being published on the consent holder's website. Are you able to please provide me with a copy of the latest report and direct me to where they are on your website?

With thanks,

**Claire Frooms**  
Environmental Protection Officer



Phone: 03 520 7400

15 Seymour Street, PO Box 443  
Blenheim 7240, New Zealand  
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**From:** Mark Preece [<mailto:Mark.Preece@kingsalmon.co.nz>]

**Sent:** Wednesday, 31 July 2019 7:18 AM

**To:** monitoring

**Subject:** BOI sites MEMAMP

Hi Abby

Please find attached the MEMAMP for the BOI sites – Ngamahau, Kopaua and Waitata salmon farms.

From

Mark

**Mark Preece**



+64 2 92489440 | [www.kingsalmon.co.nz](http://www.kingsalmon.co.nz) | 43 Dublin Street, Picton, 7220.

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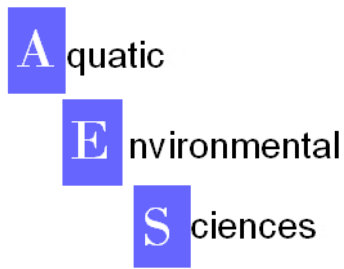
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Mark James, Aquatic Environmental Sciences Ltd  
Peter Longdill, Groundswell Science & Consulting Ltd  
Shaun Ogilvie, Eco Research Associates Ltd

Review date 29.4.2019

Comments on the report "2018-2019 Annual Environmental Monitoring Report for the Kopaua Salmon Farm" (Cawthron Report 3310).

The Reef habitat monitoring report (Dunmore, 2019) has not been provided and has not been reviewed.

#### **General Comments:**

1. Generally, the reports are straight forward reporting of results from the recent monitoring programme. The reports are well written, easy to follow and fit-for-purpose meeting the requirements for the consent conditions and the current Marine Environmental Monitoring Adaptive Management Plan (MEMAMP).

The PRP only have a few comments as listed below otherwise are happy with the report. Most of these are minor and more around clarification.

#### **Report 1: 2018-2019 Annual Environmental Monitoring Report for the Kopaua Salmon Farm (Cawthron Report 3310) -marked as "DRAFT FOR CLIENT REVIEW"**

1. **Section 2.1, second paragraph.** *"Three reference or 'control' stations were sampled, one near-field (PS-Ctl-7) and three far-field (PS-Ctl-3, PS-Ctl-4 and PS-Ctl-5)."*

The description suggests that FOUR (4) benthic reference stations were sampled, so the text may need amendment.

2. **Figure 3.** A trend line through the ZME results, would suggest that if patterns continued, the ZME EQS would be breached in the next monitoring.
3. **Section 2.1.2 Copper and Zinc.** Suggest to add a sentence stating the actual range of 2019 measured values of Cu and Zn. The second sentence of the paragraph presumes that those ranges have been stated already, (e.g. "While **these** concentrations are elevated...")

4. **Section 2.1.2 Copper and Zinc.** The Zinc values in Table 3 (89-107 mg/kg) are HIGHER, not lower than the levels from those stations last year (66-83 mg/kg). The sentence will need correcting.
5. **Section 2.2.1 Water Column Monitoring Results, Box 1.** *“They found evidence of a subtle increase of suspended inorganic solids in Pelorus Sound since mid-2014 (most notably, inner Pelorus Sound), and some evidence of increased nitrate concurrent with a reduction in ammonium in Pelorus Sound, concurrent with a reduction in ammonium. “*

Delete the repetition of “concurrent with a reduction in ammonium”

6. **Section 2.2.1 Key Findings.** *“In March, all stations 500 m from the KOP farm (NZKS02 – NZKS05), and the CE-Ref breached the WQS. The second step DO WQS threshold (WQS [2]) was only exceeded in March (Table 5). There was evidence of an effect of the salmon farm on mid-water DO beyond 500 m from the farm. Further analysis of monthly water column profiles may be appropriate.”*

A number of stations >250 m from the pens exceeded the DO WQS in Feb and March, not technically a breach of the WQS which requires 3 consecutive months of exceedances (refer to Table A3.1 of the MEMAMP for 2018-2019), however, it does raise some concerns. Accordingly, this monitoring report would benefit from actually providing (not suggesting) the further analysis, the assessment, and evaluation of probable cause.

7. **Section 3, Key Findings.** *“It is therefore recommended that additional analyses (e.g. a regional time series analysis) are undertaken should ES scores at these sites continue to increase (based on the next annual monitoring results). “*

The key finding / recommendations section of the report should go further here. Sulphides are already highly elevated at the 250 m sites and if the present trajectory of ES enrichment continues next year, the ZME EQS (and potentially the OLE EQS) would be breached in the next monitoring. This section should consider that, a recommendation for what actions are suggested to avoid a future breach should be identified.