

From: Mark Preece
Sent: 12 Aug 2020 15:46:45 +1200
To: monitoring
Subject: RE: MEM-AMP for NZKS BOI sites
Attachments: Peer review panel - 2020 21 MEMAMP - final.docx

Kia ora Claire

Please see attached the PRP comments on the 20/21 MEMAMP.

Me rongō

Mark

From: Mark Preece
Sent: Friday, 31 July 2020 5:12 PM
To: monitoring <monitoring@marlborough.govt.nz>
Subject: MEM-AMP for NZKS BOI sites

Hi Claire

Please find attached the MEM-AMP for the BOI of sites. It is still under discussion with Cawthron and the PRP. At this stage we'd like to strengthen and start moving towards using the eDNA approach. While there is a small amount of work to do (Cawthron say this is imminent), it's highly likely we can start the transitional approach agreed at the MDC Environment Committee meeting (ENV0220-236) when Cawthron presented the work. I am suggesting several ways we can approach monitoring:

1. eDNA for compliance reporting followed by a full check using macrofauna
2. eDNA for compliance monitoring followed by a check on one site (as recommended by Cawthron, BSWG and MDC minutes)
3. Status quo – macrofauna.

We are thinking of having a meeting to discuss and agree the monitoring approach (involving Cawthron / MDC / NZKS) prior to starting monitoring.

I will be in touch to discuss.

Thanks

From
Mark

Mark Preece



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Peer Review Panel Review Comments on the Draft Marine Environmental Monitoring – Adaptive Management Plan for Salmon farms Ngamahau, Kopaua and Waitata (2020-2021)

prepared for NZ King Salmon Ltd and Marlborough District Council

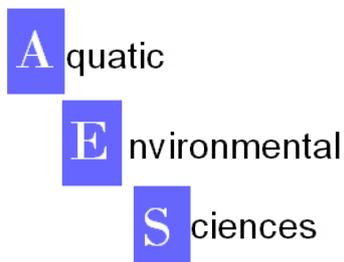
by

Mark James, Aquatic Environmental Sciences Ltd

Peter Longdill, Groundswell Science & Consulting Ltd

Shaun Ogilvie, Eco Research Associates Ltd

Review date 10 August 2020



1. Introduction

As part of the final conditions of consent for the development of the Ngamahau, Waitata, and Kopaua (Richmond) salmon farms in the Marlborough Sounds New Zealand King Salmon was required to establish a Peer Review Panel (**PRP**) for the purposes of reviewing and providing recommendations to the Council and consent holder in respect of the adequacy and appropriateness of various reports including the Baseline Plan, the Baseline Report, **Marine Environmental Management and Adaptive Management Plan (MEM-AMP)**, and Annual Reports for farms consented by the Board of Inquiry. The 2020/21 MEM-AMP was submitted to the PRP for comment on 28th July 2020.

2. Review of MEM-AMP for 2020/21

General comments

- The MEM-AMP is consistent with previous MEM-AMPs, with minor changes as agreed between the parties and comments made on previous MEM-AMPs.
- The 2020/21 MEM-AMP meets the requirements of the conditions for the three farms and is fit-for-purpose.
- As noted previously the only major ongoing issue we see is the apparent continued lack of involvement by the Tangata Whenua Panel in terms of participating in the monitoring surveys in some way, as was raised in earlier meetings. It would be timely to arrange a workshop meeting initially between the PRP, TWP, KS and Cawthron, with a goal of building engagement of the TWP in the monitoring processes.
- We are aware that the BMPs for both water column and benthic habitat have been finalised. A process for inclusion of any changes needs to be documented. This may be best done separately but will impact on the MEM-AMP. Maybe this is an objective for the 2021/22 MEM-AMP as this could result in a need to amend the consents. The review of the consent could include a review of the monitoring and whether all the components need to continue.
- The following points are generally minor and while not necessarily significant would assist with clarification.

Specific comments

- It is assumed that the level of feed will be reported for clarification on whether at full capacity – this is relevant for the benthic sampling at Zone 2/3 boundary.
- P9 – Section 3.3. We may be reading this wrong but how can soft sediment habitat sampling have “historically been undertaken in accordance with the BMP guidelines (MPI 2019a)”?? Does this mean it is consistent in which case no changes may be required?
- Section 3.4 – there is a footnote re use of eDNA. We agree that the use of eDNA needs further analyses and trialling before being incorporated into the MEM-AMP.
- Section 3.5 and 4.4 – the PRP would like to see a process to implement the new guidelines where necessary, noting they are only guidance. We would expect this to be addressed in the next MEM-AMP. SYC needs to be defined, we assume it is Single Year Class?

- The 2018-2019 annual reports for Waitata and Ngamahau recommended amending (moving further away from the pen) the seabed OLE zone boundaries in reflection of the observed deposition patterns as opposed to modelled patterns only when the initial locations were set. Consent conditions allow for such amendments, within limits. We are not aware that any such amendment has occurred. The 2019-2020 annual reports for those farms indicated lower levels of benthic enrichment, attributed to lower feed inputs over preceding period. With feed levels likely to increase over time, it may be prudent for NZKS and Cawthron to reconsider taking action on those earlier recommendations. Updating those zone boundary locations based on the actual monitoring results (2018-2019), as opposed to the current locations which were set from modelling, and which is allowed for under the consent, would likely ease the consent management process going forward as feed levels increase again.
- Section 4.5.3 – Would be useful to note here the changes that have been agreed and implemented or maybe colour code the parameters in the table?
- Section 5 appears to refer to reef monitoring for a number of additional sites but note that this MEM-AMP only refers to the three BOI sites. Appreciate they are all monitored together.
- Section 6.1.1 – not clear why as this is the first year for both WTA and KOP, that this will not be included in upcoming annual reports? The results of the light monitoring should be reported in an annual report.
- Section 7 – please add that reports received from the PRP will be 2 weeks following their receipt by the PRP.
- As discussed above and below it is not clear that the MEM-AMP has been sent to TWP or what the response has been? The PRP would like to see the TWP response as it is important that we know they have had adequate opportunity to engage, and time for input.

Tangata Whenua Panel (TWP)

There is continued uncertainty for the PRP that mauri has been appropriately considered in the MEM-AMP.

Again we refer specifically to the passage below, taken from the minutes of the PRP meeting with the TWP in May of 2015:

“Mauri: TWP keen to have an iwi monitor person on board during the scientific surveys, to undertake a Cultural Health type Index. Mauri is the health of the waterway and the environment as well. The existing method of monitoring will partially fulfil this, but also need a suitably qualified Mauri person to do this.”

Whilst we are aware that some discussions have been had with a member of the TWP, and subsequently there could be alternative ways of assessing mauri, it still appears that this issue will not be addressed in this latest MEM-AMP.

As mentioned previously the PRP are of the opinion that mauri monitoring (in whatever manner is agreed by the TWP) should be part of the MEM-AMP process. Again we would also encourage that Cawthron present the findings of the next annual report at a meeting with the PRP and TWP. It is also appreciated that King Salmon have tried to engage with the TWP and a meeting is planned with KS, a member of the PRP and the GM Māori at Cawthron Institute to try and move this forward.