

BEFORE THE MARLBOROUGH DISTRICT COUNCIL

Application: U190438

UNDER the Resource Management Act 1991 (the Act)

IN THE MATTER of an application to install and operate a salmon farm(s) within a 1792 hectare site in the Open Ocean, 6 to 12 kilometres due north of Cape Lambert in the Cook Strait

APPLICANT The NZ King Salmon Co. Ltd

MEMORANDUM OF COUNSEL: POTENTIAL FOR PERCEIVED CONFLICT OF INTEREST

Dated this 25th Day of February 2020

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May it Please the Commissioners:

1. NZ King Salmon has had some preliminary discussions with engineers at WSP Opus in respect of an appropriate process for certifying salmon farming structures that will be manufactured overseas. Gary Tear from OCEL will give expert evidence at the hearing for NZ King Salmon's open ocean application. No one from WSP Opus will be called to give evidence. However, it is possible that NZ King Salmon will have a business relationship with WSP Opus in respect of its farms in the future.
2. NZ King Salmon has made its contacts within WSP Opus aware that Reginald Proffit has been engaged as an independent commissioner to hear this application. Given Commissioner Proffit works in a different division within WSP Opus, NZ King Salmon's expectation is that the company will be able to manage any potential for a conflict internally. Nevertheless, we wish to draw the Commissioners' attention to this potential future business relationship in the interests of transparency.
3. In our view, no conflict of interest arises.



Quentin A M Davies and Amanda L Hills
Solicitors for the Applicant