

Good morning MEP Hearing Committee

Thank you for the opportunity to present on Tuesday, it was good to be able to discuss Sanford's view on the proposed plan. As explained at the hearing we are very committed to Marlborough and want to see the region prosper.

Below are the answers to your questions that could not be answered full on Tuesday.

*Q: Under section 31 of our submission we questioned DOC's request to broaden the scope of section 8.3.7 to avoid all activities that disturb the seabed in ecologically significant marine sites. We were asked by the Committee which Sanford sites are affected.*

The table below sets out the sites that are (i) within 400m of an ecologically significant site and (ii) inside an ecological significant site – to the best of our knowledge. At this stage we have had no official notification from the Council on which of our licences are affected by the proposed zoning. To make this assessment we overlaid the ESS zones against a map of our farm licences. In total

<b>MFL - owned by Sanford</b>	<b>Within 400m from ESS</b>	<b>Inside ESS</b>
8088		√
8091		√
8111		√
8178	√	
8187	√	
8190		√
8241	√	
8313	√	
8440	√	
8442	√	
8444		√
<b>MFL – contract growers</b>		
8042	√	
8218		√
8219	√	
<b>MFL - Share farms</b>		
8240		√
8573	√	
<b>MFL - lease</b>		
8193		√
8194	√	

*Q: Can we please have an example of the information you have gathered in Big Glory Bay (BGB) around water column monitoring under your Best Aquaculture Practice (BAP) certification.*

The requirement from BAP is below, and attached (bgb.pdf & V11131.pdf) are examples of the monitoring from Big Glory Bay. Under BAP we gained certification by complying with the second point.

Either the applicant shall comply with one or more of the following:

- Show evidence (e.g., pre-existing research on carrying capacity modeling) that the total cultivation effort within the water body does not exceed the production carrying capacity of that water body. This evidence shall be provided to and verified by GAA or an agreed independent reviewer.
- Demonstrate a suitable monitoring and/or regulatory regime, and/or zonal management program is in place to ensure future levels of cultivation do not exceed the production carrying capacity of the water body.

*Q: Why did Sanford oppose so many sections of the original MEP?*

That's a good point and we will learn from it – while our submission does have a bias towards opposing or seeking amendments to the proposed plan our relief is hopefully seen as proactive and collaborative.

*Q. In Sanford's original MEP submission you submitted that council should identify sites that are nationally significant rather than regionally significant as this is consistent with the approach in the NZCPS.*

Yes, that is correct. For example, in relation to Policy 8.1.1, the s 42A Officer summarises Sanford's submission as follows (at [68]):

“Sanford Ltd [1140.029] opposes the policy as they state that the NZCPS focuses on nationally significant areas and it doesn't require regionally significant areas to be mapped. They have requested that all ecologically significant marine sites be removed from the MEP and for a full reassessment of the sites be conducted using national criteria.”

Gascoigne Wicks addresses this in legal submissions on behalf of the MFA and Aquaculture New Zealand (we are members of both) at paragraphs [19] – [21] of the attached. These submissions were filed with the Panel last Monday. They cited the Northland Regional Council as an example of targeting regionally significant areas and argued that more targeted protection of specific sites was preferable to wide ranging zones that diluted effort.

With thanks  
Zane

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