Re-notification Amendment List

Amendments and additional points

Please note: typographical errors and minor changes not listed.

Sub no.	Submitter	Sub. point	Amendment	Details Details
2	Neil McLennan	2.1	Additional text	AMAs should be 100-250m offshore, and support monitoring - and assessing - cumulative effects. Farms should not extend more than 250m offshore to preserve existing MDC navigation and scenery protection rules
		2.2	Additional text	Increased monitoring to assess on-farm environmental effects associated with marine farming is welcome. Although it will be difficult to isolate the effects of pre-2020 mussel farming from other coastal area changes, general issues ought to be studied to fulfill Council's precautionary planning role
		2.26	Additional text	Variation 1A: Oppose new sites within the Sounds. Preference for new sites to be in the outer embayments and offshore (Cook Strait.) Recognize landowners.
		2.34	new submission point	Variation 1A: Wording of variation Guidance document 1A - it is misleading to state that the consented salmon farms in Beatrix Bay, Clay Point and Te Pangu "have not been identified as having adverse effects on the environment". It would be better to state that these farms "comply with current MDC environmental standards".
		2.35	new submission point	MARWG focus on Policy 8 in NZCPS, exclusively aquaculture. It down-plays the multi-purpose aim of the NZ Coastal Policy Statement by focusing on Policy 8. Hopefully the MEP will adequately consider the NZCPS in its entirety - especially policies 1, 3, 4, 5, 6, 7, 11, 13, 15 and 21.
		2.36	new submission point	Oppose propose to create three new finfish farm sites (in Tio Point, Richmond Bay and Horseshoe Bay) to replace three existing ones (Waihinau, Otanarau and Ruakaka). It is misleading and inappropriate to site the MPI salmon farm relocation proposal and Relocation Advisory Panel recommendations as they were not 'fait-accompli' and the current government has not adopted the Advisory Panel's recommendations.
		2.37	new submission point	It is important to realise that the ecology of the area is constantly changing. The marine environment is dynamic. We generally recognize and accept natural changes associated with tidal, seasonal and storm-related events, but we need to know what effects are likely to result from introduced industries and species. Mussel farming may reduce (and/or change) algae feed supplies to 'natural shellfish' populations, change zooplankton concentrations and species, affect larval fish survival, and alter water quality parameters (affecting jellyfish numbers, seaweed distribution, biofouling and toxic algae occurrence). Scientists have great difficulty predicting sea life changes and isolating specific causes. Multi-factor changes do not have specific causes that's life. As a society we are better to focus on general trends, encourage environmental health (e.g. increased biodiversity, reduced toxic algae occurrence, etc.), promote abundant fisheries, protect fish spawning and nursery areas (where larval fish are particularly sensitive and vulnerable), proceed cautiously, and recognize changing public values.
11	Okiwi Bay Ratepayers Association	11.1	amended	The Okiwi Bay Ratepayers Association is in agreement in general with the above Aquaculture CMU and AMA variations. We agree with the principal with shifting the Marine Farms that affect the visual impact of the Croisilles Harbour, and Sounds area. We further agree that natural land values have been given effective consideration within the document.
		11.2	new submission point	We agree with the principal with shifting the Marine Farms that affect the visual impact of the Croisilles Harbour, and Sounds area.
12	The Council of Outdoor Recreation Associations of New Zealand Inc	12.1	moved to all provisions	moved to all provisions
27		27.1	Split point	The point is split into 3 and placed on appropriate provisions.
40		40.4	amend provision	Amended to CMU 42
41		41.2	new submission point	At a high level, KEVIN BONNINGTON submits that: (a) Existing marine farms should be 'renewed' as a controlled activity without notification; and (b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its
				existing space it is moved into equivalent space; or (c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or
				(d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space. If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
		41.3	new submission point	16.4 Existing marine farms should be 'renewed' as a controlled activity without notification
42		42.2	new submission point	Our concerns in relation to the Variations are set out in more detail in the submission of Te Ohu Kaimoana, Trustee of the Māori Commercial Aquaculture Trust. We wish to adopt and fully endorse that submission.
47	Okiwi Bay Aquaculture Limited	47.3	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.

		47.4	new submission point	OBA supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as its submission.
18	PH Redwood & Company Limited	All points	·	Restructed points
49	PHR Processing Limited	49.2	additional text	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
		49.4	new submission point	PHR PROCESSING LTD supports the submission of PH REDWOOD & COMPANY LTD in its totality and adopts it as its submission. It repeats that:
				(a) Farm 8164 is very important to the mussel industry. It is essential for ensuring consistent mussel supply for PHR PROCESSING LTD's operations because: (i) The farm performs exceptionally well at growing either Golden Bay or Kaitaia spat. That is because of the characteristics of this water space, being close to the exposed cool waters of Cook Strait and because it is an isolated location. This is particularly important as many Sounds farms are struggling to hold spat. (ii) The dry outer Sounds location means that it is very rarely closed under the Marlborough Shellfish Quality Programme (MSQP) testing regime. That allows access to
				supply while other inner Sounds sites are closed. (b) The land that surrounds the farm is actively farmed/pastoral land, and is not native bush. There are no houses with a view of marine farm 8164. The site was recently re-consented. The application did not have to be publicly notified. The application was limited notified to a number of local iwi, the Department of Conservation, the Pelorus Boat Club and PH REDWOOD AND COMPANY LTD's neighbour, Waitui Holdings Ltd. Waitui Holdings Ltd and the Pelorus Boat Club both submitted in support of the application. There were no opposing submissions. The farm was given a twenty year term, expiring 30 November 2034.
		49.5	new submission point	PHR PROCESSING LTD supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as its submission.
Ε /	Wairangi Pay Marina Farms Ltd	54.1	status change	amended to enners
54	Wairangi Bay Marine Farms Ltd			amended to oppose Evicting marine forms should be 'renewed' as a controlled activity without notification
		54.2 54.3	new submission point	Existing marine farms should be 'renewed' as a controlled activity without notification At a high level, WRME submits that:
		54.3	new submission point	At a high level, WBMF submits that:
				(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and
				(b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its
				existing space it is moved into equivalent space; or
				(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or
				(d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space.
				If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
55	Waitui Holdings Limited	55.1	status change	amended to oppose
56	Worlds End Enterprises Limited	56.2	new submission point	Worlds End Enterprises supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as its/his/her submission
		56.3	new submission point	Existing marine farms should be 'renewed' as a controlled activity without notification
		56.4	new submission point	At a high level, Worlds End Enterprises Limited submits that:
				(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and
				(b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its
				existing space it is moved into equivalent space; or
				(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or
				(d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space.
				If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
57	New Zealand King Salmon	57.1	status change	Changed to oppose
		57.11	Amended to include addition	Insert a new policy and rule which addresses biosecurity. New finfish farming enterprises, particularly in the Open Ocean environment, need to be in the order of 25km apart. NZ King Salmon produces a genetically distinct forms of King Salmon, such as Tyee. The biosecurity regime which is imposed should ensure that such products are
	The state of the s		Amandad to include addition	able to be produced in a bio-secure way. Include a policy that includes provision for new finfish farming in appropriate locations, especially in the open ocean.
		57.12	Amended to include addition	
		57.12		
		57.12		Include new policy to recognise the value of ecosystem services provided by finfish farms.
			Amended to include addition	Include new policy to recognise the value of ecosystem services provided by finfish farms. Include new policies and rules: a) Consistent with the change of species provisions in NESMA; and b) Providing for the addition of finfish species within AMAs.

l	I	F7.46		
		57.16	new submission point	The Plan needs to enable adaptation to the risks that climate change will bring
		57.17	new submission point	Requires updated s32 Report considering alternative options [inferred]
		57.18	new submission point	Amend Variation 1A to be consistent with NESMA [inferred]
		57.19 57.20	new submission point	It is inappropriate for MARWG to be used as a basis for decisions regarding finfish and, consequently, Variation 1 should not apply to finfish.
		57.20	new submission point	At a high level, NZ King Salmon submits that if FAMAs are to be created, FAMAs should be drawn to ensure that no existing marine farm loses area, and if the farm is
				shifting from its existing space it is moved into equivalent or better space (and allowing for a minimum 24 month transition period if the farm is to be moved).
		57.21	new submission point	Support in part - If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that
				farm(s) should move into new space in bays or reaches where the conditions are suitable for rearing salmon. That is consistent with the principle of no loss of marine farming space.
58	Vincent Smith	58.1	Change status	amended to support (support in part)
		58.2	amend wording	Regarding 8334 in South East Bay, I can see how this farm can work within the new AMA system. Just a few more details, which I am sure will come with the role out of the new AMA system.
59	Port Underwood Association	59.8	new submission point	All provisions - The Association supports the rules that are derived from Objectives 13.21 and 13.22 and the associated policies to those objectives.
61	Wakatu Incorporation and Kono NZ LP	61.46	new submission point	At a high level:
	, ,			- AMAs should be drawn in a way that ensures that no existing marine farm loses area, total backbone length and if the fann is shifting from its existing space it is moved into equivalent space.
				- Where necessary, the existing marine farm(s) should stay where they are currently installed (including when they are offsite); or
				- The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space; and
				- The boundaries for AMAs should allow flexibility to be extended in particular circumstances, in particular where a renewal consent is sought for an existing farm within an
				AMA and for ecological or practical reasons it is not possible for that relocation to take place exactly within the boundaries of the AMA.
				- If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should
				move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone
				length.
				Tengui.
68	Ministry for Primary Industries	68.56	new submission point	Amend explanation of Policy 13.20.2 as follows:
				New marine farms *located outside of AMAs, ASAs or FAMAs* are prohibited in the enclosed waters of the Marlborough Sounds
71	Arthur John Reader	71.1	status change	amended to support (support in part)
		71.2	new submission point	Arthur John Reader supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as his submission
72	Marine Farming Association Incorporated and Aquaculture New Zealand		note	A number of point now have 'support in part' noted at the request of the submitter. As these do not impact the content of the submission the points have not been listed.
		72.54	Additional para	The policy will address the effects of all Sounds activities so may be better located in another part of Chapter 13.
		72.55	new submission point	All mapping provided is indicative. The 96 general maps included as part of this submission show the proposed AMA boundaries as dashed lines to allow for any
				adjustments
				required/identified by the line by line reconciliation process. The use of a solid yellow line on the three 'Backbone Overlay' maps, by contrast, indicates a greater level of
				confidence. If no alternative mapping (yellow lines) is provided, then we are seeking to retain the AMA as notified, provided the notified AMA is consistent with the
				consented total backbone length or with applications currently before the Marlborough District Council where those would result in an improved environmental outcome.
		72.56	new submission point	In respect of Variation 1A, the MARINE FARMING ASSOCIATION INCORPORATED and AQUACULTURE NEW ZEALAND seek that that Variation be withdrawn in its entirety.
		72.147	new submission point	Support in part - If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that
			·	farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of
				backbone length.
		72.80	Amended - additional text	There may need to be consequential changes to this text if an alternative to authorisations is used. However, there should still be an implementation plan.
		72.97	Amended - additional text	Text below Matter of Control 16.4.4.15 addressing notification Retain text.
		72.132	corrected to 24 months	Support in part - Either amend standard to allow for a transition period of up to 24 months; OR Clarify the application of policy.
		72.137	Amended tex	Support in part - Retain Appendix 11 as it pertains to Rule 16.4.5; AND Add additional rules and policies consistent with NESMA.

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		72.45, 72.54,		
		72.58, 72.64,	,	
		72.85, 72.87,	,	
		72.89, 72.90,	·	
		72.91, 72.95	status change	amended to oppose
74	Aroma (N.Z.) Limited and Aroma Aquaculture	74.9	amended reference	Amended to MF 8387
	Limited	74.17	amended reference	Amended to MF 8355
		74.28	new submission point	At a high level, AROMA (N.Z.) LIMITED and AROMA AQUACULTURE LIMITED submit that:
				(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and
				(b) AMAs should be drawn in the way set out in this submission, provided that no existing marine farm loses area, total backbone length and if the farm is shifting from its
				existing space it is moved into equivalent space; or
				(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or
				(d) The existing marine farm(s) should shift into new space as long as they do not lose area, total backbone length and the move is into equivalent space.
				If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move
				into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length.
		74.29	new submission point	Existing marine farms should be 'renewed' as a controlled activity without notification
78	Ciaran Hughes	78.9	additional wording	The provisions should specify that "equivalent" means the area for relocation must achieve the following outcomes:
				(a) be of a sufficient size so as to [be] able to accommodate the same length of longlines;
				(b) be of a sufficient size to be able to accommodate adequate spacing between longlines; with no lesser spacing than that of the farm to be relocated; (c) have the same
				or a similar level of productivity: Equivalent AMAs that meet these criteria should be identified on the planning maps.
		78.1	Additional wording	The provisions should specify that "equivalent" means the area for relocation must achieve the following outcomes:
		70.1	, tautional wording	(a) be of a sufficient size so as to [be] able to accommodate the same length of longlines;
				(b) be of a sufficient size to be able to accommodate adequate spacing between longlines; with no lesser spacing than that of the farm to be relocated; (c) have the same
				or a similar level of productivity; Equivalent AMAs that meet these criteria should be identified on the planning maps.
79	Minister of Conservation	79.22	Amend wording	Amend so it only references the matter of control
		79.23	amend wording	Only references rewording of rule 16.4.4
		79.24	amend provision and	moved to 16.4.5.4 and wrdin only references rewording of rule 16.4.5.4
			wording	
		79.38	amend wording	Retain Variation 1 elements as notified and either remove the Variation 1A elements or make the distinction more explicit, except for Map 4 as addressed below.
		75.55	amena neramg	Assess any other AMAs proposed to be included in this Variation against the principles in Policy 13.21.3, and only consider them for addition if they meet these principles.
				Assess any other Alvias proposed to be included in this variation against the principles in rolley 15.21.5, and only consider them for addition in they meet these principles.
		70.46	n avv avdaminai an maint	16.4.4 - Insert an additional matter of control for each rule as follow or to like effect:
		79.46	new submission point	
		70.17	 	"Measures to prevent the release or spread of harmful aquatic organisms".
		79.47	new submission point	16.4.5 - Insert an additional matter of control for each rule as follow or to like effect:
				"Measures to prevent the release or spread of harmful aquatic organisms".
		79.48	new submission point	13.2.3 - retain as notified
		79.49	new submission point	Retain Variation 1A elements as notified, and either remove the Variation 1 elements or make the distinction more explicit.
				Assess any other FAMAs proposed to be included in this Variation against the principles in Policy 13.21.3, and only consider them for addition if they meet these principles.
80	Steffan Browning	80.2	new submission point	All CMU - Research on the effects of the current massive longline mussel farming should be carried out before the intended increase in plankton filtration occurs, so I
			·	oppose the changes to marine farm layouts until that occurs, although there will be environmental merit in many cases of reducing inshore lines.
				The second secon
		80.3	new submission point	13.M.37 Monitoring of water column effects of mussel farming appears to be limited to using chlorophyll-A, particulate carbon and nitrogen as the tools or a proxy for
		00.5	Description point	what should be much more detailed observations of what is being filtered and consumed or killed by the extensive and unnatural mussel population. This is a big fail in
				building an understanding what is happening to the marine ecosystems of the Sounds.
				Monitoring must be much deeper and the Plan variation needs to show a determination by Council to respond effectively to the information that good comprehensive and
				independent research may provide.
				independent research may provide. There has long been information to show that mussels consume or kill a wide range of organisms, yet studies on what is being consumed and the significance of that is dodged by the marine farming industry and its chosen science providers. I can speak to this.

		80.4	new submission point	13.22.1 Monitoring of water column effects of mussel farming appears to be limited to using chlorophyll-A, particulate carbon and nitrogen as the tools or a proxy for what should be much more detailed observations of what is being filtered and consumed or killed by the extensive and unnatural mussel population. This is a big fail in building an understanding what is happening to the marine ecosystems of the Sounds. Monitoring must be much deeper and the Plan variation needs to show a determination by Council to respond effectively to the information that good comprehensive and independent research may provide. There has long been information to show that mussels consume or kill a wide range of organisms, yet studies on what is being consumed and the significance of that is dodged by the marine farming industry and its chosen science providers. I can speak to this.
83	Friends of Nelson Haven and Tasman Bay Inc	83.15	new submission point	No further increase in production means of existing marine farms and no new sites for marine farms
		83.16	new submission point	Variation 1A - No further increase in finfish farming or relocation to new finfish farming sites in the Marlborough Sounds
		83.17	new submission point	Variation 1A - Introduce BMP as generic conditions for all farms.
		83.18	new submission point	Variation 1A - Maintain footprint modelling as baseline for consent and reference to BMP.
87	Red Sky Trust	87.4	Amend provision and add wording	All provisions - addition of: If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. Any net loss of backbone metres or total length of total crop rope from this process should be made up by allowing expansion of AMA for marine farms owned by the affected coastal permit holder in the same or other Coastal Management Units. That is consistent with the principle of no loss of marine farming space and no loss of backbone length.
100	Goulding Trustees Limited	100.13	new submission point	Goulding Trustees Limited supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as its submission.

Addition of similar paragraph to existing submission point.

Sub no.	Submitter	Sub. point	Amendment	Details
14	James Maurice Goulding	14.3	additonal para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
15	Shellfish Marine Farms Limited	15.5	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
16	Sea Investments Limited	16.4	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
17	Marlborough Oysters Ltd	17.2	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
25	David Hogg	25.5	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
26	AJ King Family Trust & SA King Family Trust	26.11	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
28	Beryl Archer and John Hebberd	28.3	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
29	Bryan Skeggs	29.3	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.

30	Canantor Mussels Limited	30.3	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
31	Chris Wormersley	31.4	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
34	Clifford Bay Marine Farms Limited	34.10	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new equivalent space. That is consistent with the principle of no loss of marine farming space and no loss of backbone length.
35	David Muir McLaren & Lenore Mary McLaren	35.8	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
36	David Jones	36.3	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
37	Frank Burns	37.5	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
38	Gary & Nanette Buchanan-Brown	38.5	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
43	KPF Investments Limited and United Fisheries Limited	43.33	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length.
44	Lindsay & Jane Stuart	44.3	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
45	Michael and Anna Richards	45.4	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
46	PB Partnership	46.3	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
50	Robert and Simon Pooley	50.6	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
51	Scott Anstiss	51.3	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
73	lan Willans	73.3	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
75	Clearwater Mussels Limited	75.32	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. Examples of possible locations which, depending on the farm, might have similar characteristics, are attached to the submission.
84	J & A Seggie Family Trust	84.7	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
96	Beleve Limited, R J Davidson Family Trust, and Treble Tree Holdings Limited	96.7	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.

97	Kapua Marine farms	97.3	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. Examples of possible locations which, depending on the farm, might have similar characteristics, are attached to the submission.
98	Kuku Holdings Limited	98.4	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. Examples of possible locations which, depending on the farm, might have similar characteristics, are attached to the submission.
99	Ngati Rarua Atiawa Trust Board	99.2	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length.
100	Goulding Trustees Limited	100.1	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of longline length.
103	S.G.T McCarthy	103.2	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length.
104	T.R. Elkington and S.G.T. McCarthy	104.2	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length.
112	Apex Marine Farm Limited	112.17	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length.
113	Talley's Group Limited	113.51	additional para	If someone makes a submission that any existing marine farm should be removed from its current location, and that submission is accepted, then that farm(s) should move into new space in bays where there is currently marine farming. That is consistent with the principle of no loss of marine farming space and no loss of backbone length. Examples of possible locations which, depending on the farm, might have similar characteristics, are attached to the submission