

# **Re-notification of Summary of Submissions (by provision)**

## **Variation 1: Marine Farming and Variation 1A: Finfish Farming to the proposed Marlborough Environment Plan**

The enclosed submission summaries provide a summary of each submitter's relief requested. Please refer to the original submissions for full details.

All submissions can be viewed via the Council website.

<https://www.marlborough.govt.nz/your-council/resource-management-policy-and-plans/proposed-marlborough-environment-plan/variations/variation-1-and-1a/submissions-and-further-submissions>

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Volume	Chapter/CMU/ Appendix	Provision	Sub#	Lastname/Organisation	Name/Contact	Point	Type	Summary - decision requested
Volume One	Chapter: 13	All aquaculture provisions	53	Te Ohu Kaimoana	Laws Lawson	53.1	Neutral	For Variation 1, we consider that this will require Marlborough iwi and Te Ohu Kaimoana to work with MDC, the Ministry for Primary Industries (MPI), and industry representatives early in 2021 to explore whether there is suitable space in which mussel settlement space could be accommodated within the proposed framework, or what other options may be available. We consider it important that the Council convenes this group and that this commences soon after submissions are received so that all the issues raised through the submissions can be addressed at the same time. Variation 1A should not proceed at this stage. Propose MDC to withdraw Variation 1A. Provisions must be included in both Variations that enable Marlborough iwi to have the option of a space-based settlement. (Inferred)
			65	Waide	Gordan Brian & Gaye Eleanor Waide	65.1	Support	Support the variation as proposed.
			67	Martin	Peter Martin	67.2	Oppose	The variations go too far in the direction of allowing for aquaculture (including finfish). Consents should go through a public notification process. More should be done to monitor cumulative effects.  [Inferred]
			78	Hughes	Ciaran Hughes	78.17	Neutral	Amend the variation to enable existing marine farms not currently within an AMA to remain, and be reconseented (as a controlled activity), in their current location and with an AMA created over that existing area, until such time as equivalent (or greater) space is identified, shown as an AMA, and made available to the consent holder to relocate to ("grandparenting"), and not make marine farming a prohibited activity during that period.
			78	Hughes	Ciaran Hughes	78.18	Neutral	Provide flexibility within the variation to adjust the shape of an AMA on the basis of site specific benthic surveys, as part of the reconseenting process for older farms.
			82	Environmental Defence Society Incorporated	Cordelia Woodhouse	82.1	Support	EDS supports 1) the direction in Policy 13.21.3, and from a cursory assessment of the AMAs, is supportive of the location of the AMAs proposed. 2) the prohibited activity status for marine farming outside an AMA in an enclosed water CMU or near shore CMU. 3) provision for the development of offshore as a discretionary activity. 4) seeks to ensure that the avoidance requirements of the NZCPS (in particular Policies 11, 13 and 15) are all given effect to in the provisions of the pMEP. This requires that matters to have regard to and matters of control/discretion in the pMEP policies and rules include the adverse effects of a proposal on landscape, natural character and indigenous biodiversity. Impacts on water quality should also be considered. 5) the use of adaptive management is also supported. EDS considers that any framework for adaptive management be robust and based on an adequate evidential foundation. The continuation and enhancement of the current monitoring of effects of marine farming will assist in achieving that evidential foundation.
			82	Environmental Defence Society Incorporated	Cordelia Woodhouse	82.2	Oppose	Variation 1A EDS does not support 1) the approach taken for identifying finfish AMAs (FAMAs). Unlike the MARWG process for AMAs, the process for identifying FAMAs appears neither robust nor collaborative. 2) The proposal to relocate finfish farms to Richmond Bay and Horsehoe Bay proposals will contribute to the cumulative effects generated by the other proposed marine farms within the Waitata Reach and will subtly erode the inherent naturalness and perceptual values of the area. Both proposals will have an impact on the Maud Island outstanding natural landscape and outstanding natural character values. In addition, EDS considers that the addition of new finfish farms will be a step too far in regard to the cumulative effects of finfish AMAs on natural character and landscape values. 3) Restricted discretionary activity status for marine farming within these areas is therefore not supported, and EDS considers this should be full discretionary. If this change is not adopted, EDS considers that matters of discretion should include the adverse effects of a proposal on landscape, natural character and indigenous biodiversity. Currently, the matters over which the Council has reserved discretion are incomplete and do not address adverse effects on these values. This means those factors cannot be considered by the decision-maker thereby preventing assessment and control of adverse environment effects.

		85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.1	Oppose	1) Withdraw Variation 1 as it applies within the Ngāi Tahu takiwā. 2) Create separate enclosed water and open water CMUs for that part of the coastal marine area that lies within the Ngāi Tahu takiwā. 3) The Council in partnership with Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu: (i) identify areas within Te Tai o Marokura where aquaculture would be inappropriate and areas where it may be appropriate with a resource consent; and (ii) develop the appropriate provisions to guide decision-making on such applications in the Proposed Marlborough Environment Plan. 4) To notify a variation to the Proposed Marlborough Environment Plan to manage marine farming within the Ngāi Tahu takiwā once that mahi has occurred
		85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.14	Oppose	Variation 1A 1) Withdraw Variation 1A as it applies within the Ngāi Tahu takiwā. 2) Create separate enclosed water and open water CMUs under the proposed Marlborough Environment Plan for that part of the coastal marine area that lies within the Ngāi Tahu takiwā. 3) The Council in partnership with Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu identify areas within Te Tai o Marokura where finfish farming would be inappropriate and areas where it may be appropriate with a resource consent; and the appropriate provisions to guide decision-making on such applications in the Proposed Marlborough Environment Plan. 4) To notify a variation to the Proposed Marlborough Environment Plan to manage finfish farming within the Ngāi Tahu takiwā once that mahi has occurred
		85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.17	Neutral	Ngāi Tahu do not request any amendment to Variations 1 and 1A as they apply outside the Ngāi Tahu takiwā as this is for other iwi authorities to determine.  However we do suggest that whatever the final form of the plan provisions, the relationship between the general provisions for marine farming in Variation 1 and the specific provisions for finfish farming in Variation 1A need to be reconciled
		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.1	Neutral	In our view the social and economic values of proposed renewal activities are the same as those for proposed new activities and as such a proposition to elevate renewal activity for protection under NZCPS policy 8 is unsupported. All aquaculture activity, whether new or renewal activity, must meet the same environmental standards and principles.  We cannot see an basis made for an increase to the band of area considered 'appropriate' for aquaculture activity.
		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.2	Neutral	Whilst the NES facilitates some consent conditions for the 'adaptive management' of ecological or biodiversity effects, the NES does not facilitate the adoption of a precautionary approach on ecological or biodiversity grounds when re-consenting. Therefore, we submit, this must, if appropriate, be adopted at the local planning level. As we explain below, a precautionary approach is required in some areas, particularly where the signals are toward potentially significant adverse effects. V1 fails in this regard.
		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.3	Neutral	We submit that V1 should adopt, as a Sounds wide ecological carrying capacity standard, the pelagic carrying capacity provisions as prescribed in para 2.2 of the ASC Standard. Council should incorporate into its allocation regime a discretion to prorate reductions in activity levels across all of a group of existing marine farmers in such manner as MDC deems appropriate.
		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.4	Neutral	1. If, and contrary to our submission, the pelagic standard is not adopted by V1, then we would submit that at the very least the pelagic effect standard safe harbour rule (being a relevant water body should carry no more than a 10% coverage of bi-valve aquaculture), must be adopted as part of the V1 benthic standard. Secondly, the determinants of an ES 4 level are not fully disclosed, including if and to what extent changes in community structure are considered acceptable. 2. Our submission is that unnaturally induced changes in community structures can adversely effect publicly held values in the ecosystem and also challenge the resilience of indigenous biodiversity. As such, these effects should be avoided if potentially significant, or otherwise remedied or mitigated. We submit that the prescribed ES 4 test may stand as deficient in this respect.
		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.5	Oppose	Council to determine whether or not the activity proposed for AMA's will have a significant adverse effect on the natural landscape or natural feature values of any area with natural landscape or natural character values - with that assessment taken from a baseline naked of the proposed AMA activity (NZCPS 7, 13.1(b) and NZCPS 15(b)). Council has not undertaken this assessment either. As such we submit that the proposed AMA's are also inappropriate to this extent.
		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.6	Neutral	We submit that it be made clear in the provisions that the utility of CMU's is limited to planning and consenting administration and that CMU's should not be taken as indicating boundaries to the reach of effects of activities.

		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.7	Neutral	AMAs should commence no closer than 100m from mean low water mark unless that is determined as inappropriate for environmental reasons and that AMAs should not extend beyond 250m from mean low water mark.
		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.9	Neutral	We also submit that 'mean low water' should be objectively defined in order to avoid confusion or disputes over where an AMA's geometric location should be actually measured from. We submit that 'mean low water' should be defined as mean low water springs as this point can be objectively determined by reference to chart datums.
		93	Ngāti Apa ki te Rā Tō Charitable Trust	Simon Karipa	93.1	Oppose	The relief we seek in relation to the Variations is that both be amended to allow the opportunity for settlement assets in the form of water space to be available to Marlborough iwi, if that is the outcome agreed between iwi and the Crown. Because of the extent of the changes that will be required to the Variations in order to achieve this, we agree with Te Ohu Kaimoana that appropriate course is for those Variations to be withdrawn at this time, so that further work can be done by the Council in partnership with Marlborough iwi, as well as industry and the Crown. We wish to be heard in relation to this submission and if others make a similar submission, we will consider presenting a joint case with them at the hearing.
		95	Te Rūnanga o Ngāi Tahu	Rakihia Tau	95.1	Oppose	Recommends: <ul style="list-style-type: none"> <li>• withdraw Variation 1A</li> <li>• establish a working group between iwi, Te Ohu, MPI, the Council and, where appropriate, industry representatives, to address issues relating to settlement and any other opportunities, including re-design and provide a new Variation 1A that gives effect to the Crown's settlement obligations that arise from the Settlement Act.</li> <li>• amend the proposed variations to enable iwi to obtain space-based settlement assets in the Marlborough coastal marine area;</li> <li>• amend provisions in both variations to recognise likely changes and developments in climate change and technology over the next 20 years.</li> </ul>
		108	Marlborough Recreational Fishers Association	John Leader, Des Boyce and Lawrence Stevenson	108.1	Oppose	It has been clearly shown that rearing salmon in the Sounds is not a viable economic activity, and NZ King Salmon should be encouraged to pursue alternative, preferable land-based methods.
		108	Marlborough Recreational Fishers Association	John Leader, Des Boyce and Lawrence Stevenson	108.2	Neutral	For mussel farms, Council should mandate yearly monitoring of activities, to ensure that farming can continue in a sustainable fashion, without seriously impinging on the rights of other users of the Sounds, and allowing recreational fishing to proceed. In addition, coastal occupancy charges should be introduced. This would enable funding for monitoring the activities of mussel farmers.  Scallop fishery - We urge the MDC to manage its responsibility.
		110	Kenepuru and Central Sounds Residents' Association	Andrew Caddie	110.12	Neutral	We reserve the right to submit further on this issue as the hearing process proceeds and /or we obtain expert professional advice.
		112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.17	Neutral	(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.
		51	Anstis	Scott Anstis	51.3	Neutral	At a high level; (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.



		84	J & A SEGGIE FAMILY TRUST	Bruce Cardwell	84.7	Neutral	(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.
		73	WILLANS	IAN WILLANS	73.3	Neutral	(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.
		50	ROBERT AND SIMON POOLEY	Bruce Cardwell	50.6	Neutral	(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.
		46	PB PARTNERSHIP (WAINUI GREEN LIMITED & TWO MF LIMITED)	Bruce Cardwell	46.3	Neutral	(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 the MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND 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.
		45	MICHAEL AND ANNA RICHARDS	Bruce Cardwell	45.4	Neutral	(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.

		44	LINDSAY AND JANE STUART	Bruce Cardwell	44.3	Neutral	<p>(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and</p> <p>(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</p> <p>(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(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.</p> <p>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.</p>
		38	GARY BROWN AND NANETTE BUCHANAN-BROWN	Bruce Cardwell	38.5	Neutral	<p>(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and</p> <p>(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</p> <p>(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(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.</p> <p>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.</p>
		37	BURNS	FRANK BURNS	37.5	Neutral	<p>(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and</p> <p>(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</p> <p>(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(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.</p>
		36	JONES	DAVID JONES	36.3	Neutral	<p>(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and</p> <p>(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</p> <p>(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(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.</p> <p>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.</p>
		34	CLIFFORD BAY MARINE FARMS LTD	Quentin Alexander Muir Davies and Kerry Morgan Moor	34.10	Neutral	<p>(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and</p> <p>(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</p> <p>(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(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.</p>

		35	DAVID MUIR MCLAREN & LENORE MARY MCLAREN	Bruce Cardwell	35.8	Neutral	(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.
		31	Womersley	Chris Womersley	31.4	Neutral	(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.
		30	CANANTOR MUSSELS LIMITED	Q A M Davies, A L Hills and E L Deason	30.3	Neutral	At a high level; (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.
		29	Skeggs	Bryan Skeggs	29.3	Neutral	(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.

		28	BERYL ARCHER & JOHN HEBBERD	Bruce Cardwell	28.3	Neutral	<p>(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and</p> <p>(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</p> <p>(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(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.</p> <p>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.</p>
		26	AJ KING FAMILY TRUST & SA KING FAMILY TRUST	Bruce Cardwell	26.11	Neutral	<p>(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and</p> <p>(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</p> <p>(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(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.</p> <p>(e) 'Equivalent space' should be defined in terms of relevant farming characteristics, production potential, and efficiency and viability of farming that space. Relocations should not be undertaken in a manner that reduces the farming characteristics for the farm being relocated, or the adjacent farms.</p> <p>(f) Relocations should be used as an opportunity to gather background water column monitoring data as anticipated by the Technical Advisory Group and to track indicators over time, prior to, and as, the relocated farms are installed and operated.</p> <p>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.</p>
		25	Hogg	David Hogg	25.5	Neutral	<p>(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and</p> <p>(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</p> <p>(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(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.</p> <p>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.</p>
		16	Sea Investments Limited	Jim Goulding & Julian Goulding	16.4	Neutral	<p>At a high level,</p> <p>(a) Existing marine farms should be 'renewed' as a controlled activity without notification; and</p> <p>(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</p> <p>(c) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(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.</p> <p>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.</p>

		14	James Maurice Goulding	Jim Goulding & Julian Goulding	14.3	Neutral	<p>At a high level, (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.</p> <p>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.</p>
		15	Shellfish Marine Farms Limited	Jim Goulding & Julian Goulding	15.5	Neutral	<p>At a high level:  (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.</p> <p>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.</p>
		22	Te Runanga o Toa Rangatira	Naomi Solomon	22.1	Oppose	<p>The decision we seek from Council is to discontinue Variation 1 and 1A until mana whenua/tangatawhenua has had an opportunity to engage with council on this subject. We ask that council fulfil their role as Treaty Partners and be inclusive of mana whenua/tangatawhenua values and principles.</p>
		17	Marlborough Oysters Ltd	Aaron Pannell	17.2	Neutral	<p>At a high level;  (a) 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  (b)The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or  (c) 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.</p> <p>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.</p>
		43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.33	Neutral	<p>At a high level:  (a) 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  (b) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or  (c) 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.</p> <p>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.</p>

		113	Talley's Group Limited	R D Sutherland	113.51	Neutral	<p>(a) 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</p> <p>(b) The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</p> <p>(c) 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.</p> <p>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</p>
		107	Ngāi Tahu Seafood	Thomas Hildebrand	107.1	Neutral	Amend provisions in both variations to recognise likely changes and developments in technology over the next 20 years.
		107	Ngāi Tahu Seafood	Thomas Hildebrand	107.20	Oppose	V1A: Finfish Farming Schedule of Changes is withdrawn replaced with a fit-for-purpose Variation
		102	McGuinness Institute	Wendy McGuinness	102.1	Oppose	<ul style="list-style-type: none"> <li>We seek the deletion of every objective, policy, rule or other method that is inconsistent with the Government's aquaculture strategy, or the amendment of those provisions and/or addition of new provisions to ensure the strategy is implemented, but we go further. We seek provisions: <ul style="list-style-type: none"> <li>That finfish farming be either landbased or deepsea based by 2040.</li> <li>Both the Queen Charlotte and Pelorus Sounds become finfish free by 2040.</li> <li>A transitional plan is developed and agreed to cover this transition from 2022 to 2040.</li> </ul> </li> <li>That provisions are introduced to preclude any new marine finfish farms from being given a coastal permit in the inner and outer Queen Charlotte or Pelorus Sounds (with the view the existing Long Island - Kokomohua Marine Reserve<sup>43</sup> be extended from west to east, connecting Ship Cove, Motuara Island bird sanctuary<sup>44</sup> and Arapawa Island).</li> <li>That the existing coastal permit system continues, but that more work is done at enabling the farms to be seen as a group, and as such having group impacts; and to the extent that the Plan enables finfish farming in the Marlborough Sounds, it does so on the basis that no sites are pre-determined to be appropriate, and applications for any sites are open to full assessment on a case-by-case basis, with appropriate weight able to be put on environmental values. Public consultation and legal processes must continue to be available to the public. The public's success to date indicates how important these processes are, and are indicative of the changing values and expectations in society and in the law. For policy to be durable, it needs to be flexible and trusted. •That the NZKS application for offshore aquaculture should be treated as simply another application in the Marlborough Sounds. It should not be treated separately, as it is within the 10 nautical miles and therefore forms part of the MDC area of management. Furthermore, landbased aquaculture, inshore aquaculture and offshore aquaculture operate together as one business model, therefore, in our view, their impacts cannot be assessed in isolation.</li> <li>That limits and targets are included in variation 1 and 1A to provide clarity of purpose and improve public trust and transparency over intentions and guide decision making.</li> <li>A bird sanctuary be created around the black shags, so they are managed and researched to improve and support biodiversity within the Marlborough Sounds.</li> <li>We support the concept of Coastal Marine Unit (CMU) and the resulting 45 units, however we believe a mechanism needs to be put in place to bring them together so as to understand interconnections and improve public policy outcomes. The fact that the proposed CMUs traverse land and ocean, supports our view that an integrated approach is necessary to bring about the intention of the RMA (section 5, 6 and 7).</li> <li>Such other changes to the provisions of Variations 1 and 1A (whether those are alternative, additional or consequential to the changes outlined above) as may be required to address the issues identified above.</li> </ul>

		105	Orman	Bridget and Tony Orman	105.1	Oppose	The time is for the Marlborough District Council to self examine it's perspective of the Marlborough Sounds. Reassessment needed Accordingly the council needs to urgently re-evaluate its Marlborough Sounds policy. It needs to jettison its policy of seeing the Sounds in an exploitation light and to see it in an environmental light with economic benefits from outdoor recreation, scenic values and tourism use. Of concern is that aquaculture occupies public sea bed space but pays no rates. Rates from aquaculture could be used to fund research and monitoring which seems to be lacking. Monitoring should not be done by the 'laisse-faire' policy of relying on complaints from the public. Apart from divers seeing sludge under farms, how is the public to see and complain about ill effects under the water? Monitoring needs to be more regular - not a lax five year gap. Early or preferably six monthly monitoring would be advisable. Summary Rather than "rolling over" aquaculture renewals, a positive move should be made to relocate mussel farms and salmon farms into open water as is done in other parts of New Zealand, e.g. Coromandel. In a nutshell there are aspects of aquaculture which need addressing:- MDC needs to jettison the "industrial use" policy and focus on the public's environment, outdoor recreation and tourism which generates regional economic activity
		105	Orman	Bridget and Tony Orman	105.2	Oppose	No more aquaculture in the Sounds. Growth rates of farmed mussels have declined strongly suggesting the carrying capacity for mussel farms has been exceeded. There should be no future for fin fish farming in the Sounds, water or land based. Aquaculture should be moved to open waters.
		103	McCarthy	S.G.T McCarthy	103.2	Neutral	At a high level, S.G.T McCarthy 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 farms 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.
		104	Elkington and McCarthy	T.R. Elkington and S.G.T. McCarthy Elkington and McCarthy	104.2	Neutral	At a high level, T.R. Elkington and S.G.T. McCarthy 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.
		66	Tu Jaes Trust	Jean Hadley and Alice Behan	66.1	Support	Retain variations 1 and 1A as proposed.
		86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.6	Support	Set limits on aquaculture. In some bays the carrying capacity of the environment has been exceeded and this requires a bay by bay assessment.
		86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.8	Oppose	To reject Proposed variation 1A. To alter the relevant Policies, rules and definitions as suggested at paragraphs 13,15 and 17. To undertake and expert review of cultural values for each CMU.
		86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.15	Oppose	Incorporate mechanisms for the Crown to settle any fisheries obligations in to the proposal. [inferred]
		111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.1	Oppose	Te Ātiawa urges precaution across the board and also the application of significant monitoring /compliance terms, along with, proactive adaptive management, in the event that it is approved: E tata tapahi, e roa whakatū (It can take a long time to repair a rash act.)

		111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.20	Neutral	With respect to the proposed Variation 1A, Te Ātiawa urges precaution across the board and the also application of significant monitoring /compliance terms, along with, proactive adaptive management, in the event that it is approved: E tata tapahi, e roa whakatū (It can take a long time to repair a rash act.)
		111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.22	Oppose	That the Variation 1 and 1A process be put on hold, until Marlborough's Tangata Whenua Iwi have been adequately supported by the MDC to achieve a reasonable capacity to respond meaningfully, and that the related and applicable engagement process which follows this outcome offers sufficient breadth of 'collaborative management', as anticipated by Te Ātiawa Kaitiaki and affirmed by Te Tiriti o Waitangi.
		88	New Zealand Sports Fishing Council	Helen Pastor	88.1	Support	Only approve future consents for land-based aquaculture. Land-based aquaculture will contain filtration systems for run-off, which is more sustainable for the natural environment. This aligns with the NZSFC policy 4.2.1 where marine biodiversity is no longer threatened by land-based aquaculture.
		88	New Zealand Sports Fishing Council	Helen Pastor	88.5	Oppose	For Marlborough District Council to realign focus to environmental, public interest, tourism, and recreational sectors.  We recommend the Marlborough District Council does not issue any new consents for marine farms, as MARWG and the Marlborough District Council acknowledge the enclosed sounds are at full capacity.
		88	New Zealand Sports Fishing Council	Helen Pastor	88.7	Oppose	Wait until the RMA reform has come to fruition before proposing the variation changes
		89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.2	Support	Support moving marine farms seaward and more stringent rules for replacement consent for existing farms.
		89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.16	Neutral	If the Sounds Advisory Group is part of the collective consultation process in conjunction with others (see page 7 and 8 of Section 32 Evaluation) show evidence to support this.
		89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.17	Neutral	As list in the S32 Report, the following should include provisions so that Marpol requirements are mandatory: Objective 13.1 – 13.3, 13.6, 13.7, 13.10, 13.12a, 13.14, 13.15, 13.17, 5.13.M
		89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.19	Neutral	The total effect form all forms of farming in the marine environment need to collectively address the possibility of cumulative effects as climate change issues inclusive of sea level rise and the inevitable effect of same on the land areas adjacent to the CMA under some policy and conditions of consent.
		89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.28	Neutral	The Council in addressing issues for remote and isolated areas of the Marlborough Sounds must address guidance Document as per 1A and make available to all the Marlborough Sounds community the full proposal from the Ministry of Primary Industries. This proposal must of course have addressed the New Zealand Coastal Policy Statement (2010).
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.2	Neutral	Whilst the NES facilitates some consent conditions for the 'adaptive management' of ecological or biodiversity effects, the NES does not facilitate the adoption of a precautionary approach on ecological or biodiversity grounds when re-consenting. Therefore, we submit, this must, if appropriate, be adopted at the local planning level. As we explain below, a precautionary approach is required in some areas, particularly where the signals are toward potentially significant adverse effects. V1 fails in this regard.
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.4	Neutral	1. If, and contrary to our submission, the pelagic standard is not adopted by V1, then we would submit that at the very least the pelagic effect standard safe harbour rule (being a relevant water body should carry no more than a 10% coverage of bi-valve aquaculture), must be adopted as part of the V1 benthic standard. Secondly, the determinants of an ES 4 level are not fully disclosed, including if and to what extent changes in community structure are considered acceptable. 2. Our submission is that unnaturally induced changes in community structures can adversely effect publicly held values in the ecosystem and also challenge the resilience of indigenous biodiversity. As such, these effects should be avoided if potentially significant, or otherwise remedied or mitigated. We submit that the prescribed ES 4 test may stand as deficient in this respect.
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.5	Neutral	Council to determine whether or not the activity proposed for AMA's will have a significant adverse effect on the natural landscape or natural feature values of any area with natural landscape or natural character values - with that assessment taken from a baseline naked of the proposed AMA activity (NZCPS 7, 13.1(b) and NZCPS 15(b)). Council has not undertaken this assessment either. As such we submit that the proposed AMA's are also inappropriate to this extent.
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.6	Neutral	we submit that it be made clear in the provisions that the utility of CMU's is limited to planning and consenting administration and that CMU's should not be taken as indicating boundaries to the reach of effects of activities.



		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.7	Neutral	AMAs should commence no closer than 100m from mean low water mark unless that is determined as inappropriate for environmental reasons and that AMAs should not extend beyond 250m from mean low water mark.
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.49	Neutral	All aquaculture activity, whether new or renewal activity, must meet the same environmental standards and principles. We cannot see any basis made for an increase to the band of area considered 'appropriate' for aquaculture activities.
		94	Pearson	Mark Pearson	94.1	Oppose	I would oppose ANY further placement of salmon farms within the Marlborough Sounds. I would go so far as to advocate the removal of existing salmon farms in areas where they could possibly come into contact with native fish.
		97	Kapua Marine Farms Limited	R D Sutherland	97.3	Neutral	At a high level, Kapua Marine Farms 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 backbone length.
		98	Kuku Holdings Limited	R D Sutherland	98.4	Neutral	At a high level, Kuku Holdings 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.
		99	Ngati Rarua Atiawa Trust Board	R D Sutherland	99.2	Neutral	At a high level, Ngati Rarua Atiawa lwi Trust Board 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. See submission for details.  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.
		96	Beleve Limited, R J Davidson Family Trust, and Treble Tree Holdings Limited	R D Sutherland	96.7	Neutral	- 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 - 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.  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.

		2	McLennan	Neil McLennan	2.34	Oppose	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	McLennan	Neil McLennan	2.35	Oppose	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	McLennan	Neil McLennan	2.36	Oppose	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-accomplis' and the current government has not adopted the Advisory Panel's recommendations.
		2	McLennan	Neil McLennan	2.37	Oppose	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.
		100	Goulding Trustees Limited	Jim Goulding & Julian Goulding	100.10	Neutral	At a high level, Goulding Trustees 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.
		100	Goulding Trustees Limited	Jim Goulding & Julian Goulding	100.13	Neutral	Goulding Trustees limited supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as its submission.
		87	Red Sky Trust	Kevin Oldham	87.4	Neutral	At a high level: (a) 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 (b)The existing marine farm(s) should stay where they are currently installed (including when they are offsite); or (c) 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; or (d)The existing marine farm(s) should shift into a high-flow area as long as they do not lose total length of crop rope when using shorter droppers as is necessary to cater for mussel farming operations in a high flow environment.  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.

		61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.46	Neutral	<p>At a high level:</p> <ul style="list-style-type: none"> <li>-AMAs should be drawn in a way that ensures 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.</li> <li>-Where necessary, the existing marine farm(s) should stay where they are currently installed (including when they are offsite); or</li> <li>-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</li> <li>-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.</li> </ul> <p>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.</p>
		59	Port Underwood Association	Ken Roush	59.8	Support	The Association supports the rules that are derived from Objectives 13.21 and 13.22 and the associated policies to those objectives.
		47	Okiwi Bay Aquaculture Ltd	Margaret Hippolite	47.3	Neutral	<p>At a high level, OBA 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.</p>
		47	Okiwi Bay Aquaculture Ltd	Margaret Hippolite	47.4	Neutral	OBA supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as its submission.
		42	Koata Limited	Hemi Toia	42.1	Oppose	The relief we seek in relation to the Variations is that both be amended to allow the opportunity for settlement assets in the form of waterspace to be available to Marlborough iwi, if that is the outcome agreed between iwi and the Crown. Because of the extent of the changes that will be required to the Variations in order to achieve this, we agree with Te Ohu Kaimoana that appropriate course is for those Variations to be withdrawn at this time, so that further work can be done by the Council in partnership with Marlborough iwi, as well as industry and the Crown.
		42	Koata Limited	Hemi Toia	42.2	Oppose	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.
		41	Bonnington	Kevin Bonnington	41.2	Neutral	<p>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.</p> <p>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.</p>

		83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.1	Neutral	Existing aquaculture activities and proposed new sites for aquaculture be assessed in the context of a valid and reliable assessment and mapping exercise for (1) the identification of areas of high, very high and outstanding natural character within the coastal environment, and (2) outstanding natural features and landscapes (including seascapes) in the Marlborough Sounds. It is a central issue in Friends appeal on the MEP that this process has been deficient, and the landscape and natural character provisions of the Decisions Version of the MEP are invalid and unreliable. A consequence of this is that only 22 marine farms within the Sounds (of some 580 marine farms in total) have been identified within ONFL/ONC overlays. Existing and proposed aquaculture should also be assessed against associated schedules of landscape/seascape values and natural character attributes and characteristics. Such schedules should clearly enunciate what is sought to be protected, and values and attributes should "...be described in terms of their landscape capacity and resilience, so that issues of vulnerability and sensitivity can be identified." . It is a further issue in Friends' appeal on the MEP that the Appendix 1 (ONFL) and Appendix 2 (Natural Character) schedules are not fit for purpose in assessing the appropriateness of marine farming within the Marlborough Sounds. A discretionary activity rule framework that enables these matters to be assessed in any application for a new coastal permit for an existing aquaculture activity; and non-complying or prohibited rule framework for new aquaculture activities in such areas. Marlborough Environment Plan (MEP) appeal process be deferred until such time as Variations 1 and 1A to the MEP merge with and become part of the MEP. By way of example, Friends appeal on MEP will require consideration of Policy 13.21.3, Policy 13.21.4 and Policy 13.21.6 as part of the integrated management task. Such deferral will allow to give effect to Objective 13.21 - Provide for marine farming in appropriate locations while protecting and maintaining the values of Marlborough's coastal environment.
		83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.2	Neutral	Maintain and recognize the prohibited status for aquaculture in Coastal marine Zone 1 in the operational plan as an integrated part to achieve sustainable management. Newly created farm space in the coastal marine zone 1 of Richmond Bay and new FAMA's for salmon farming in Richmond Bay, Horseshoe Bay and Tory Channel to be deleted.
		83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.15	Oppose	No further increase in production means of existing marine farms and no new sites for marine farms
		83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.16	Oppose	Variation 1A - No further increase in finfish farming or relocation to new finfish farming sites in the Marlborough Sounds
		83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.17	Oppose	Variation 1A - Introduce BMP as generic conditions for all farms.
		83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.18	Oppose	Variation 1A - Maintain footprint modelling as baseline for consent and reference to BMP.
		49	PHR Processing Limited	Quentin Davies and Kerry Moor	49.2	Oppose	It submits that further consideration needs to be given to the industrial realities, including (but not limited to): (a) The fact that not all water is equally productive, nor the same in nature. Not all water space can be used for the same purposes. (b) That for factories to be supplied with mussels for the largest possible portion of the season, it is necessary to have farms spread across the MSQP areas. This includes providing space for farms in the dry outer Sounds (such as farm 8164) which very rarely closed under the MSQP testing regime. These farms are essential for continual supply such to help with keeping operations going year round, rather than seasonally. (c) Outer Sounds marine farms, for various reasons, tend to be larger than inner Sounds farms. The outer Pelorus/ D'Urville Island marine farms have been deemed inappropriate due to 'outstanding natural features and landscapes'. In terms of the mussel processing industry, this is of concern, as removal of these farms means a much greater production loss. (d) Outer Sounds farms are all proven to be superior spat holding farms. Some farms are used exclusively as spat nurseries. This is becoming increasingly important as spat retention and growth is becoming difficult at other sites, in the inner Sounds. As with all farming no seed means no crop; no crop means no processing. PHR PROCESSING LTD cannot over-state its distress at the potential loss of such important farms. (e) The inner Sounds bays need to be managed to ensure that overstocking does not occur. Overstocking can cause quality and supply issues. (f) Transition timeframes need to account for the time and expense involved in relocating mussel farms, including the limited number of boats in the area that are capable of shifting and installing farms. Inadequate transition periods will impact on production and supply.
		49	PHR Processing Limited	Quentin Davies and Kerry Moor	49.5	Neutral	PHR PROCESSING LTD supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as its submission.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.56	Oppose	In respect of Variation 1A, the MARINE FARMING ASSOCIATION INCORPORATED and AQUACULTURE NEW ZEALAND seek that that Variation be withdrawn in its entirety.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.140	Neutral	NESMA consistently mis-cited. Make necessary consequential amendments.

		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.141	Neutral	Ensure first letter of defined terms are capitalised throughout (or not) to ensure consistency.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.146	Neutral	At a high level : 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 The existing marine farm(s) should stay where it/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.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.147	Neutral	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.
		48	PH Redwood & Company Limited	Quentin Davies and Kerry Moor	48.2	Oppose	It submits that further consideration needs to be given to the industrial realities, including (but not limited to): (a) That not all water is equally productive. (b) That for factories to be supplied with mussels for the largest possible portion of the season, it is necessary to have farms spread across the Marlborough Shellfish Quality Programme (MSQP) areas. (c) Some farms are used exclusively as spat nurseries. (d) The bays need to be managed to ensure that overstocking does not occur. (e) Transition timeframes need to account for the time and expense involved in relocating mussel farms, including the limited number of boats in the area that are capable of shifting and installing farms.
		48	PH Redwood & Company Limited	Quentin Davies and Kerry Moor	48.4	Neutral	At a high level, (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. That is consistent with the principle of no loss of marine farming space and no loss of backbone length.
		75	Clearwater Mussels Limited	R D Sutherland	75.32	Neutral	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. Examples of possible locations which, depending on the farm, might have similar characteristics, are attached to the submission.
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.28	Neutral	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.
		57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.1	Oppose	Variation 1 That the provisions in Variation 1 apply only to the growing of non-fish species and consequently delete all references to finfish from Variation 1.
		57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.2	Oppose	Amend Variation 1A throughout to change any reference to salmon "cage" or "cages" to "pen" or "pens".
		57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.15	Oppose	Variation 1A should be withdrawn and replaced with a fit-for-purpose Variation

		57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.16	Oppose	The Plan needs to enable adaptation to the risks that climate change will bring
		57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.17	Oppose	Requires updated s32 Report considering alternative options [inferred]
		57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.18	Oppose	Amend Variation 1A to be consistent with NESMA [inferred]
		57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.19	Oppose	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	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.20	Support	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	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.21	Support	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.
		79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.1	Neutral	Retain all variation provisions except for recommendations made in other submission points and consequential changes required to give effect to the intent of the recommendations of the Marlborough Aquaculture Review Working Group (MARWG).
		71	Reader	Arthur John Reader	71.3	Support	At a high level, Arthur John Reader 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.
		56	Worlds End Enterprises Limited	Brian & Nanette Bunting	56.2	Neutral	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	Worlds End Enterprises Limited	Brian & Nanette Bunting	56.4	Neutral	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.
		54	Wairangi Bay Marine Farms Ltd	Margaret Hippolite	54.3	Support	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.

		12	The Council of Outdoor Recreation Associations of New Zealand Inc (CORANZ)	Andi Cockroft (Chairman)	12.1	Oppose	CORANZ calls for stricter controls on aquaculture. Rather than "rolling over" aquaculture renewals, a positive move should be made to relate mussel farms and salmon farms into open water as is done in other parts of New Zealand, e.g. Coromandel. In a nutshell, there are aspects of aquaculture which need addressing. (a) re-location offshore (b) No more aquaculture in the Sounds. Growth rates of farmed mussels have declined strongly suggesting the carrying capacity for mussel farms has been exceeded. (c) The aquaculture which continues to occupy the public's space of the seabed, pays no rates. It is logical that they pay rates and at amounts that cover environmental policing and compliance (d) MDC needs to jettison the "industrial use" policy and focus on the public's environment, outdoor recreation, and tourism which generates regional economic activity.
		40	Tester	Jonathon Tester	40.17	Neutral	Entire variation insofar as it relates to existing marine farm not currently within an AMA (including rule 16.7.9 and associated policies) - Amend the variation to enable existing marine farms not currently within an AMA to remain, and be reconseented (as a controlled activity), in their current location and with an AMA created over that existing area, until such time as equivalent (or greater) space is identified, shown as an AMA, and made available to the consent holder to relocate to ('grandparenting). and not make marine farming a prohibited activity during that period. For space to be regarded as equivalent it must meet the outcomes set out in paragraph 4.7 above.
		40	Tester	Jonathon Tester	40.18	Neutral	Entire variation - Provide flexibility within the variation to adjust the shape of an AMA on the basis of site specific benthic surveys, as part of the reconseenting process of older farms.
		68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.48	Neutral	Amend Variation 1A to ensure it enables a clearer and more certain direction for sustainable salmon farming in Marlborough, including realising the objectives of the Marlborough Sounds salmon farm relocation proposal.
	Heading	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.15	Neutral	Urgently address Coastal Occupancy Charges
		111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.17	Neutral	For there to be adequate engagement and to show how the particular iwi values are acquired for these provisions.  (Inferred)
		111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.18	Neutral	All of those propositions need to be counter balanced by soundly understanding the cost of not acting alternatively. Then a balanced/safe conclusion is possible.
		111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.19	Oppose	Provide an appropriate specific response in Variation 1? With respect t to the proposed Variation 1, Te Ātiawa urges precaution across the board and the also application of significant monitoring /compliance terms, along with, proactive adaptive management, in the event that it is approved: E tata tapahi, e roa whakatū (It can take a long time to repair a rash act.)
		92	Sanford Limited	Alison Undorf-Lay	92.36	Oppose	Policy 13.2.3 (a) -Delete insertion
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.138	Oppose	Replace text with "apart from those objectives and policies listed under Issue 13N (and the associated methods of implementation and anticipated environmental results), this chapter does not contain provisions managing marine farming."
		79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.36	Support	Retain as notified.
		Introduction	24	Marlborough District Council	Louise Walker	24.1	Support
	91		Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.10	Neutral	i. Delete para 3; ii. Amend para 4 Paragraph 4 to refer to appropriate densities. iii. Para 6 - It should be made clear here that the meeting of existing activity level is aspirational only – being contingent on the meeting of environmental standards and requirements and that as such it may not be possible to maintain all existing aquaculture within the Sounds.
	90		Clova Bay Residents Association Incorporated	Trevor Offen	90.9	Neutral	i. Delete para 3; ii. Amend para 4 Paragraph 4 to refer to appropriate densities. iii. Para 6 - It should be made clear here that the meeting of existing activity level is aspirational only – being contingent on the meeting of environmental standards and requirements and that as such it may not be possible to maintain all existing aquaculture within the Sounds.
	92		Sanford Limited	Alison Undorf-Lay	92.4	Neutral	Replace "measured by consented surface area" in para 6 with "measured by consented backbone length".  Amend to provide more flexibility to the 50m gap between farms by adding 'should generally be 50 meters between farms in different ownership'.

	59	Port Underwood Association	Ken Roush	59.1	Support	Support the statements: There is continuing and growing demand for coastal space and resources for commercial activities such as marine farming. While recognising the benefits of marine farming in Marlborough, it is important to make sure that this activity occurs in appropriate locations and is well managed to ensure the sustainable management purpose of the RMA is achieved. The proposed new spatial layout is aiming to strike a balance between maintaining the current amount of marine farming (measured by consented surface area) so that the benefits of that existing investment can continue to be received by the community, but to layout those marine farms in a more optimal manner. The Council have decided to be more stringent than the NESMA in areas identified as inappropriate for marine farming and have made marine farms in areas identified as inappropriate a prohibited activity.
	83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.3	Neutral	Include in quotation: "..... by: including in regional policy statements and regional coastal plans provision for aquaculture activities in appropriate places in the coastal environment."
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.11	Support	Amend text to replace 1970s with 1960s.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.12	Neutral	Amend introductory text as follows: At paragraph 2 insert as first sentence: "Marlborough is the largest aquaculture growing region in New Zealand, producing the majority of King salmon (56%) and Greenshell mussels (65%)." Replace last sentence paragraph 2 with: "Today, Marlborough's marine farming industry is made up of a mixture of large companies, small family businesses and iwi, including joint ventures and collaborations that produce premium seafood and high value products for export and domestic markets." Amend paragraph 3 in relation to benefits to include: comment on economic, social, cultural and environmental (ecosystem services, restoration) – Reference NZIER (2015) , TNC/Encourage Capital, ecosystem services report. Insert new paragraph 3: "There is a Government Aquaculture Strategy (2019) that sets a vision for New Zealand to be world-leading in sustainable and innovative aquaculture management across the value chain. Government has identified aquaculture as a key primary sector to accelerate economic growth for the benefit of New Zealand8." Insert new paragraph 4: "Future sustainable growth of the aquaculture industry will come from maximising the value of existing farms through innovation, high value novel products, and through increasing productivity, and extending into open ocean finfish aquaculture. Other forms of aquaculture such as restorative aquaculture and the farming of seaweeds and other new species will likely be part of future aquaculture in Marlborough."
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.13	Neutral	Replace sixth paragraph ("measured by consented surface area") with ("measured by consented backbone length").
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.14	Neutral	Correct typo: should be "... (NESMA) came into force on 1 December 2020..."
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.15	Neutral	Correct typo. Page 3, final paragraph, fourth sentence. "Near-shore CMU" should be "Near-shore CMUs" plural.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.48	Support	13.2.3 - retain as notified
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.8	Neutral	Amend paragraph 7 of the introduction to the Marine Farming section as follows: The Resource Management National Environmental Standards for Marine Aquaculture Regulations 2020 (NESMA) came [deleted] into force on 1 December 2020. The NESMA provides for existing marine farms to seek replacement consents through the regulations, rather than through the rules in the regional plan. Regulation 13 of the NESMA states that a regional plan may have more stringent rules for replacement consents for existing marine farms in [deleted] inappropriate areas [for existing aquaculture activities]. The Council have identified the enclosed waters CMUs and the Near-shore CMU except in a mapped AMA, as inappropriate for marine farming. The Council have decided to be more stringent than the NESMA in areas identified as inappropriate for [deleted] [existing aquaculture activities] and have made marine farms in [these] areas [deleted] a prohibited activity. This means that existing marine farms located [in the enclosed waters CMUs and the Near-shore CMU but] outside AMAs will not be able to apply for a replacement resource consent using the NESMA.
Issue 13N	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.11	Neutral	Issue 13N puts up uncertainty of future resource consent outcomes as a key issue and then renders this down in the commentary to a question of "security of occupancy". These are unavoidable functions of undertaking an exploitive activity in a highly valued marine environment. They are issues that can't actually be addressed without necessarily compromising environmental standards. In our view this means they fail at a fundamental level and as such they should be removed as Issues from V1. The Issue that should be raised here is that of consenting process efficacy – seeking to maximise the efficiency of the environmental assessment process, such as through the adoption of bay by bay assessment processes, without compromising on the environmental assessments and thresholds that the activity necessarily demands.



	89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.3	Oppose	Oppose on the basis that by 2024 more research will be available regarding both the species and more appropriate structures. Furthermore change in species can have different effects on the seabed and surrounding wildlife.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.10	Neutral	Issue 13N puts up uncertainty of future resource consent outcomes as a key issue and then renders this down in the commentary to a question of "security of occupancy". These are unavoidable functions of undertaking an exploitive activity in a highly valued marine environment. They are issues that can't actually be addressed without necessarily compromising environmental standards. In our view this means they fail at a fundamental level and as such they should be removed as Issues from V1. The Issue that should be raised here is that of consenting process efficacy – seeking to maximise the efficiency of the environmental assessment process, such as through the adoption of bay by bay assessment processes, without compromising on the environmental assessments and thresholds that the activity necessarily demands.
	59	Port Underwood Association	Ken Roush	59.2	Support	Support the paragraph: Issue 13N – There is uncertainty about the future of marine farming in Marlborough. For the industry, there is uncertainty about the process and outcome of any future resource consent application when existing resource consents for marine farms expire. For the community there is uncertainty about the future location and potential growth of marine farming, and whether or not existing marine farms in current locations are resulting in adverse effects on uses and values of the coastal environment.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.16	Neutral	Amend Issue to read: "There is a need for greater certainty about the future of marine farming in Marlborough. The industry needs certainty about the process and outcome of any future resource consent application when existing resource consents for marine farms expire. Some parts of the community need certainty about the future location and potential growth of marine farming, and has expressed concern that existing marine farms in current locations are resulting in adverse effects on uses and values of the coastal environment." Replace "Over 300" with a more appropriate figure.
Issue 13O	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.20	Support	We support Issue 13O. However, note our submission point above to the effect that these Issues must also be brought into objective 13.21 and policies 13.21.3, 13.21.4 and 13.21.5 for the purposes of determining where and how much aquaculture is appropriate.
	102	McGuinness Institute	Wendy McGuinness	102.2	Neutral	The marine mammal sanctuary be extended, regulated and researched, with a particular focus on the Hector's dolphins. The sanctuary could run along the mouth of all three entry points (to the Tory Channel, the Queen Charlotte and Pelorus) and up to French Pass. A bird sanctuary be created around the black shags, so they are managed and researched to improve and support biodiversity within the Marlborough Sounds.
	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.2	Oppose	With respect t to the proposed Variation 1, Te Ātiawa urges precaution across the board and the also application of significant monitoring /compliance terms, along with, proactive adaptive management, in the event that it is approved: E tata tapahi, e roa whakatū (It can take a long time to repair a rash act.)
	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.6	Oppose	There is a need to turn marine farming aspirations to a less sensitive open ocean option and recast the way that the industry might address that. This could be similar to the commercial forestry functional model, where there are owners and a range of support service providers. If this approach isn't given front-foot attention in this process, it will evolve haphazardly and undesirably. The future needs to be confronted, proactively,
	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.12	Neutral	For the variaions to address that Te Ao Māori is a complete world operating in parallel to Te Ao Pākehā and that Te Ao Māori is a complete Māori cultural world, which mean the adverse effects cited in this instance concern 'everything'.  (Inferred)
	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.16	Neutral	Te Ātiawa seeks the inclusion of intent to investigate and act on the 'micro plastic' threat in Variation 1.
	89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.29	Neutral	Ensure that the existing sea grass in the surrounding area is not adversely affected
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.19	Neutral	We support Issue 13O. However, note our submission point above to the effect that these Issues must also be brought into objective 13.21 and policies 13.21.3, 13.21.4 and 13.21.5 for the purposes of determining where and how much aquaculture is appropriate.
	59	Port Underwood Association	Ken Roush	59.3	Support	Support the inclusion of the statement in the plan -Issue 13O – If not managed well marine farming has the potential to have adverse effects, including cumulative adverse effects, on other processes, values and uses of the coastal environment.

	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.15	Neutral	Amend the explanation of Issue 13O as follows: Marine farming activity raises a number of issues for managing the coastal environment, especially in the Marlborough Sounds where most of the [deleted] [existing marine farms are located]. These may include impacts from, or adverse effects on, the following: ... • reverse sensitivity including: Page 13 of 33 # Provision Submission Decision sought • the establishment of marine farming where none has previously existed; or • where established or existing marine farming may be subject to activities[,] such as new tourism or residential activity that may affect water quality;
Objective 13.21	32	The NZ Rock Lobster Industry Council (NZRLIC) and The Pāua Industry Council (PIC).	Mark Edwards	32.5	Neutral	In the interests of facilitating 'integrated management' (a core responsibility for the Council under the RMA), we suggest that the Fisheries Act requirement should be referred to in the Variations or guidance material. (see original submission)
	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.12	Neutral	This objective should refer to marine farming in appropriate locations and densities
	88	New Zealand Sports Fishing Council	Helen Pastor	88.2	Oppose	To not relocate marine farms to open water Coastal Management Units as relocating of farms to open water is just shifting the environmental issues associated with marine farms to another site.  For Marlborough District Council to only approve future consents for land-based aquaculture.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.11	Oppose	This objective should refer to marine farming in appropriate locations and densities
	59	Port Underwood Association	Ken Roush	59.4	Support	The Association supports Objective 13.21 and therefore the associated policies.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.17	Neutral	Amend text of objective to read: [Deleted] [Maintain and enhance the existing] marine farm[ing industry] [deletefd] while protecting and maintaining the values of Marlborough's coastal environment. In addition, the commentary should be amended to: a) Refer to the NZIER report, the NIWA ecosystems report14, the MPI Value of a Job report, and the MPI 2013 and the Keeley 2009 reviews. b) Add to the end of the second sentence "and the physical and operating requirements of marine farms." c) Add to the final sentence after "occurs in appropriate locations" the words "in accordance with the wealth of available information, ..."
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.3	Support	Retain as notified.
	11	Okiwi Bay Ratepayers Association	Tim Greenhough	11.1	Support	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.
Objective 13.22	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.21	Neutral	This is about the management of marine farms once they are established. We submit that the wording be amended by adding "avoiding or" before "minimised" in the first sentence.
	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.8	Support	Supports policy
	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.13	Oppose	The cost of Both SOE and specific marine farm performance monitoring /compliance must be met by the industry, as the industry is totally reliant on the public domain, not then private domain, for its existence and profit making. Rates must not cover these aspects. Iwi must be provided with exemption from all related fees / charges / costs, as colonization and its effects have negated the ability of iwi to have acted effectively as kaitiaki, which would have prevented the current parlous natural world state situation.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.20	Neutral	This is about the management of marine farms once they are established. We submit that the wording be amended by adding "avoiding or" before "minimised" in the first sentence.
	59	Port Underwood Association	Ken Roush	59.5	Support	The Association supports Objective 13.22 and therefore the associated policies.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.53	Support	Retain provisions.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.11	Support	Retain as notified.
Policy 13.20.2	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.48	Oppose	We disagree with a grandparenting allocation mechanism after the first term of AMA consents. Facilitating perpetual use entitlements is inequitable and inefficient. All AMA consents should be tendered after the first AMA consent term.
	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.4	Oppose	It is important that a sunset date is applied to all consents and that the rolling process results in re-tendering; a just position. This re-tendering should be weighted, first for iwi, second for local people and then for others.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.47	Oppose	We disagree with a grandparenting allocation mechanism after the first term of AMA consents. Facilitating perpetual use entitlements is inequitable and inefficient. All AMA consents should be tendered after the first AMA consent term.

	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.139	Neutral	Replace references to "new marine farms" with "marine farms, other than provided for in these rules". Provide for a circumstance where a party persuades the Council that a new AMA can be created, by allocating space to that party who provides Council with the necessary technical and scientific information necessary to establish the AMA (refer above to submissions in respect of policy 13.21.7) If the alternative regime proposed by MFA/AQNZ is preferred, make necessary consequential amendments.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.37	Support	Retain as notified.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.49	Neutral	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...
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.56	Support	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... (* denotes proposed new text)
Policy 13.21.1	13	Bigley	Peter John Bigley	13.1	Oppose	With regards to Policy 13.21.1(e): Replace "existing marine farms are provided for at their existing size." with "existing marine farms are provided for at their existing size and an equivalent amount of viable and farmable space."  Decision sought with regards to the farm reconfiguration: "That Council consults with the Mussel Farmers before deciding on the final form of the AMA in order to achieve viable/affordable and logical solutions in terms of the implementation, and take into consideration farm productivity, efficiency and a simplification of the farm structure to achieve affordable implementation and transition.
	24	Marlborough District Council	Louise Walker	24.4	Support	Amend policy or add a new policy stating that finfish farming at the Otanerau Bay (MF 8396) and at Waihinau Bay (MF 8085) is an inappropriate aquaculture activity and FAMAs have therefore not been provided for these sites. However, these sites are not deemed inappropriate for other forms of aquaculture activity so have been provided as AMAs. Text sought to amend Policy 13.21.1 (d) to include the following (new text between **): (d) new and existing aquaculture activities are inappropriate in the following zones: (i) Coastal marine zone (ii) Port zone (iii) Marina zone (iv) Port landing area zone except for aquaculture, **other than finfish farming**, in an AMA overlay or the open water CMU** and for finfish farming in a FAMA or the open water CMU**
	24	Marlborough District Council	Louise Walker	24.10	Support	Amend policy to read: Amend policy 13.21.1 as follows: (d) new and existing aquaculture activities are inappropriate in the following zones: (i) Coastal marine zone (ii) Port zone (iii) Marina zone (iv) Port landing area zone except in an AMA overlay or the open water CMU; (e) where possible, ... (Please note there is another submission lodged by Council seeking a change to this policy)
	78	Hughes	Ciaran Hughes	78.9	Neutral	Amend to make it clear that where an existing farm needs to be relocated an area for relocation must be provided which is "equivalent". 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.
	85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.7	Oppose	Amend clause (c) to read: "marine farms may be appropriate in the off-shore CMUs and which will be assessed under Policy 13.21.6 and in the Enclosed Water CMU for Te Tai o Marokura which will be assessed under Policy 13.21.8."  Renummer subsequent clauses accordingly.

91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.13	Neutral	<p>1. We agree that marine farming outside of AMAs and within the enclosed waters of the Sounds is inappropriate.</p> <p>2. The utility of CMU's for managing marine farms is limited to administrative. This should be clarified in the commentary to the policy.</p> <p>3. (f) should be deleted as it does not contemplate meeting environmental standards at all and stands to clash with other environmentally focused policies.</p> <p>4. creating new AMA space with a view toward only allocating it to displaced existing consent holders from elsewhere is inequitable – the wider public is just as entitled to the use of that public marine space as someone who has previously had a consented activity elsewhere.</p>
76	Marlborough Aquaculture Limited	David Clark	76.2	Oppose	Amend policy 13.21.1 to exempt marine farms from being prohibited.
107	Ngāi Tahu Seafood	Thomas Hildebrand	107.21	Neutral	Policy 13.21.1(b) Policy 13.21.1(e) Policy 13.21.1(f) - That the identification of AMAs for some of the NTS sites on the maps are not consistent with the approach identified in the policies, so either the decisions requested in terms of the maps need to be made, or the policy framework needs to be adjusted so that it is more accurate
62	The Marlborough Environment Centre	Tim Newsham	62.2	Neutral	Amend the policy as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming.
70	Nelson Marlborough Conservation Board	Kath Inwood	70.11	Oppose	Amend Policies 13.21.1-6 as required to ensure that no new AMA space is allocated in CMU 44 Waitata Reach for marine farming.
89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.4	Neutral	For item (d), add all the new designated coastal living area as set by the balance of the Plan.
90	Clova Bay Residents Association Incorporated	Trevor Offen	90.12	Neutral	<p>1. We agree that marine farming outside of AMAs and within the enclosed waters of the Sounds is inappropriate.</p> <p>2. The utility of CMU's for managing marine farms is limited to administrative. This should be clarified in the commentary to the policy.</p> <p>3. (f) should be deleted as it does not contemplate meeting environmental standards at all and stands to clash with other environmentally focused policies.</p> <p>4. creating new AMA space with a view toward only allocating it to displaced existing consent holders from elsewhere is inequitable – the wider public is just as entitled to the use of that public marine space as someone who has previously had a consented activity elsewhere.</p>
92	Sanford Limited	Alison Undorf-Lay	92.5	Neutral	Policy 13.21.1(f) - Replace "equivalent amount of space" with "equivalent amount of farmable space" and add "the space provided is, as far as reasonably practical, to be equivalent space". A definition of equivalent space will need to be inserted, as per the submission above.
92	Sanford Limited	Alison Undorf-Lay	92.6	Neutral	Replace Part 7A mechanism with a searchable map identifying the consent holder entitled to apply for a specific AMA area. (Examples of how this would look are attached to submission) (Sanford provided examples of this for Anakoha Bay, Elie Bay and Nikau Bay - see submission for maps)
61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.2	Neutral	<p>Amend Policy 13.21.1(c) to state: "new marine farms may be appropriate..."</p> <p>Further amend policy 13.21.1(c), or add new policy (d), to provide either that: "existing marine farms in Offshore CMUs will be located within AMAs"; or "existing marine farms in Offshore CMUs will be provided for as a controlled activity." (Or similar equivalent policy wording with the same effect). Corresponding changes will need to be made to the explanation to the Policy.</p> <p>Draw AMAs around existing marine farms and in particular Wakatū Farm 8561 at D'Urville.</p>
61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.3	Neutral	<p>Adopt MFA/AQNZ submission 'Replace Part 7A mechanism with a searchable map identifying those consent holders who will be entitled to apply for each line in its identified location.'</p> <p>In the event that for any reason this Decision is not adopted or implemented, at a minimum Wakatū/Kono seek that the Council amend Policy 13.22.1(g) and any other relevant provisions to provide that where a proposed AMA covers the same area as an existing marine farm (whether in a Enclosed Water, Nearshore, or Offshore CMU), a new consent can be applied for that a marine farm as a controlled activity, without the need to first obtain an authorisation.</p>
61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.4	Neutral	Adopt MFA/AQNZ submission regarding Decisions Sought in respect of Policy 13.21.1(f).
83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.4	Neutral	<p>Introduce additional policy: - CMU's as tool to manage biodiversity decline and ecological management in the Marlborough Sounds is limited due to:</p> <ul style="list-style-type: none"> <li>• Environmental heterogeneity exists at multiple spatial scales to which organisms respond differently and at different scales;</li> <li>• Connectivity is an important ecological pattern and process;</li> </ul>

	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.18	Neutral	Amend Policy 13.21.1(c) to begin: "Where not identified as AMAs, ..." Provide for marine farms 8561 and 8001 in AMAs, as per the submissions of those consent holders. If Variation 1 applies to FAMAs, applications in the offshore CMU should be (F)AMAs as relevant.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.19	Neutral	Amend second paragraph of commentary by deleting "adverse effects" and replacing with "adverse and positive effects". Add a new Policy to recognise ecosystem services and other benefits provided by aquaculture.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.20	Neutral	Replace "equivalent amount of space" with "equivalent amount of [farmable] space" and add "the space provided is, as far as reasonably practical, to be equivalent space". A definition of equivalent space will need to be inserted [as stated in separate submission point]
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.21	Neutral	Replace Part 7A mechanism with a searchable map identifying those consent holders who will be entitled to apply for each line in its identified location. Examples of how this would look in practice are shown on the three sample maps attached to this submission. The submission period was not long enough for the industry to complete this line by line exercise. It is in the process of doing that work. Tentative indicative amendments to the AMA boundaries are depicted in yellow. Maps are being prepared showing the location of individual lines within those yellow AMAs. Refer also submission in respect Policy 13.21.7.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.143	Neutral	Amend Policy 13.21.1(d)(ii) to include: "..., except for the Queen Charlotte College line in Shakespeare Bay."
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.4	Support	Retain as notified, except for changes as to improve clarity and effectiveness set out in submission.
	40	Tester	Jonathon Tester	40.9	Neutral	Policies 13.21.1 and 13.21.7- Amend to make it clear that where an existing farm needs to be relocated an area for relocation must be provided which is 'equivalent'. 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 long lines; (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.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.9	Neutral	Amend Policy 13.21.1(d) as follows and then renumber subsequent clauses of the policy: (d) new and existing aquaculture activities are inappropriate in the following zones: (i) [deleted] (i) Port zone (ii) Marina zone (iii) Port landing area zone [(e) new and existing aquaculture activities are inappropriate unless they are located within an AMA (as provided for in the Marlborough Environment Plan or through a subsequent change or variation) or the open water CMU] Either provide equivalent space for existing finfish farming in new FAMAs, or amend Policy 13.21.1(f) to acknowledge that space is being reduced and undertake a full section 32 analysis of this proposal. Amend variation provisions as necessary so that only the term "Offshore CMU" is used to refer to the Offshore CMU.
Policy 13.21.2	62	The Marlborough Environment Centre	Tim Newsham	62.3	Neutral	Amend the policy as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming.
	70	Nelson Marlborough Conservation Board	Kath Inwood	70.12	Oppose	Amend Policies 13.21.1-6 as required to ensure that no new AMA space is allocated in CMU 44 Waitata Reach for marine farming.
	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.7	Neutral	MDC needs progressive guidance from Marlborough's Tangata Whenua Iwi
	89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.5	Neutral	Regarding subletting ASAs - no decision sought.
	92	Sanford Limited	Alison Undorf-Lay	92.8	Oppose	Establish an iwi – industry – council working group to work on a solution
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.10	Neutral	Adopt MFA/AQNZ Decision Sought that the Plan should allocate further space in ASAs for iwi, in accordance with settlement legislation.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.22	Neutral	Allocate further space in ASAs for iwi, in accordance with settlement obligations and in consultation with existing growers.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.5	Support	Retain as notified, except for changes as to improve clarity and effectiveness set out in submission.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.10	Neutral	Amend Policy 13.21.2 as follows: Policy 13.21.2 – Areas [deleted] [identified as aquaculture settlement areas] [deleted] [under section 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004] are identified as Aquaculture Settlement Areas (ASAs) and resource consent to use that space for marine farming will only be granted to those holding an authorisation provided under s13 of the Māori Commercial Aquaculture Claims Settlement Act 2004. Amend the explanation of Policy 13.21.2 as follows: Areas have been [and are able to be] set aside for aquaculture for iwi under [section 12] [deleted] of the Māori Commercial Aquaculture Claims Settlement Act 2004. In these areas only [those holding authorisations issued under section 13 of that Act] [deleted] may apply for a resource consent for a marine farm. The plan provides for these areas as ASAs [deleted].

Policy 13.21.3	32	The NZ Rock Lobster Industry Council (NZRLIC) and The Pāua Industry Council (PIC).	Mark Edwards	32.1	Oppose	a) Policy 13.21.3(e) should be amended to read – Outside areas known to provide significant feeding or breeding habitat for New Zealand King Shag, elephant fish, dolphins and other important species, and outside areas of habitat of particular significance for fisheries management; and b) A new clause should be added to Policy 13.21.3 to read – (x) outside areas that are important for customary, commercial or recreational fishing where fishing activity may be significantly adversely affected by the operation of a marine farm.
	78	Hughes	Ciaran Hughes	78.5	Oppose	Amend the policies to recognise that not all of those criteria need to apply in every case and to give greater recognition that marine farms are appropriate within some ONLs.
	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.14	Neutral	1. That this policy commence with the qualifier “To the extent possible within environmental standards and other parameters, AMAs (other than ASAs) are established.... 2. Policy 13.21.3 should be amended to also require specific regard to the matters outlined in Issue 13O. 3. Considerations should include the utility or suitability of the particular area to aquaculture activities – with reference to the likes of product yield history, water currents and water depth. 4. For the purpose of paragraph (c) clarify that “recognised navigation routes” includes any point to point line of navigation that is likely to be used by recreational boaties for open speed navigation. 5. paragraph (e) should be rewritten to something along the lines as follows: “Outside of areas that are likely, singularly or cumulatively, to have a more than minor adverse effect on the feeding or breeding activities of NZ King Shag, elephant fish, dolphins, high value recreational fish species such as cod, sole, flounder, snapper or kawahai, and other important species” 6. Paragraph (f) should be corrected to account for buffer zones – e.g. by adding the words “or their buffer zones” after the following wording “ecologically significant marine sites”
	107	Ngāi Tahu Seafood	Thomas Hildebrand	107.22	Neutral	That the identification of AMAs for some of the NTS sites on the maps are not consistent with the approach identified in the policies, so either the decisions requested in terms of the maps need to be made, or the policy framework needs to be adjusted so that it is more accurate
	62	The Marlborough Environment Centre	Tim Newsham	62.4	Neutral	Amend the policy as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming.
	70	Nelson Marlborough Conservation Board	Kath Inwood	70.1	Oppose	To amend Policies 13.21.1-6 as required to ensure that no new AMA space is allocated in CMU 44 Waitata Reach for marine farming.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.13	Neutral	1. That this policy commence with the qualifier “To the extent possible within environmental standards and other parameters, AMAs (other than ASAs) are established.... 2. Policy 13.21.3 should be amended to also require specific regard to the matters outlined in Issue 13O. 3. Considerations should include the utility or suitability of the particular area to aquaculture activities – with reference to the likes of product yield history, water currents and water depth. 4. For the purpose of paragraph (c) clarify that “recognised navigation routes” includes any point to point line of navigation that is likely to be used by recreational boaties for open speed navigation. 5. paragraph (e) should be rewritten to something along the lines as follows: “Outside of areas that are likely, singularly or cumulatively, to have a more than minor adverse effect on the feeding or breeding activities of NZ King Shag, elephant fish, dolphins, high value recreational fish species such as cod, sole, flounder, snapper or kawahai, and other important species” 6. Paragraph (f) should be corrected to account for buffer zones – e.g. by adding the words “or their buffer zones” after the following wording “ecologically significant marine sites”
	92	Sanford Limited	Alison Undorf-Lay	92.9	Neutral	Replace 100 with 50m. AND Replace “in order to” with “where necessary to”. AND Insert ‘generally’ before the reference to 50 and 300m.
	2	McLennan	Neil McLennan	2.1	Oppose	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	McLennan	Neil McLennan	2.3	Oppose	CMUs and AMAs may need further consideration. Provide for experimental and onshore aquaculture.
	83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.5	Neutral	Policy 13.21.3(f) Refer to Policy 3 of NZCPS: uncertainty of ecological effect and cumulative effects are unknown and require further precaution. Marlborough Sounds as ecosystem is the culmination of a range of sequential dynamics
	83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.6	Neutral	Policy 13.21.3(f) Refer to Policy 3 of NZCPS: uncertainty of ecological effect and cumulative effects are unknown and require further precaution. Marlborough Sounds as ecosystem is the culmination of a range of sequential dynamics
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.23	Neutral	Amend text of policy to read “...are generally[, but not necessarily always,] located: ...”

	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.24	Neutral	Reword commentary to read: “[...] The Council intends that the new spatial layout achieved through AMAs will result in the values of the Marlborough Sounds [deleted] [being accounted for, by way of making it clear where existing marine farming activity will continue to occur.]”
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.25	Neutral	Policy 13.21.3(a) - Replace 100 with 50. AND Replace “in order to” with “where necessary to”.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.26	Neutral	Replace “away from” with “20m away from”. AND Replace “in order to” with “where necessary to”. AND Delete “and other areas of significant marine biodiversity value”.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.28	Neutral	The policy be amended to reflect the situation where either Appendix 1 or Appendix 2 of the Plan identifies that marine farming is inappropriate in those areas, then those areas should be avoided. The Plan should be consistent in this regard.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.29	Neutral	Amend the policy to read: “Outside areas where marine farming would adversely affect significant habitat of the New Zealand King Shag, elephant fish, dolphins and other important species.”
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.30	Neutral	Policy 13.21.3(f) Add at the end” “where this is necessary to protect those sites”.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.6	Support	Retain as notified, except for changes as to improve clarity and effectiveness set out in submission.
	40	Tester	Jonathon Tester	40.5	Oppose	Policies relating to Outstanding Natural Landscapes (including, but not limited to, Policies 13.21.3; 13.21.4; and 13.21.6) - Amend policies to recognise that not all of these criteria need to apply in every case and to give greater recognition that marine farms are appropriate within some ONLs.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.11	Neutral	Amend Policy 13.21.3 so that it is clear that it applies to those AMAs that have been established to provide for the area of existing marine farms and that were proposed at the time the variation was notified. Amend Policy 13.21.3 so that it either more accurately applies to FAMAs or excludes FAMAs (with an equivalent FAMA policy created).
Policy 13.21.4	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.1	Support	Retain policy as proposed
	78	Hughes	Ciaran Hughes	78.6	Oppose	Amend the policies to recognise that not all of those criteria need to apply in every case and to give greater recognition that marine farms are appropriate within some ONLs.
	85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.8	Oppose	Amend Policy 13.21.4 by adding at the start the words: “Except for the CMUs 38A and 8A for Te Tai o Marokura, (A)additional...”  and add to the end of the policy the words: “The establishment of any marine farm or any AMA within the CMUs for Te Tai o Marokura shall be managed in accordance with Policy 13.21.8.”
	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.16	Neutral	Accordingly, we submit that the following areas (currently CMZ 1 areas under the MSRMP) be added to Policy 13.21.4(a): • Tuhitarata Bay, in Beatrix Bay • The head waters of Clova Bay • Hopai Bay in Crail Bay • The north side of Kenepuru Sound from Skiddaw Bay around to Mills Bay • The south side of Kenepuru Sound from Broughton Bay to the Kenepuru Heads
	34	CLIFFORD BAY MARINE FARMS LTD	Quentin Alexander Muir Davies and Kerry Morgan Moor	34.1	Neutral	Amend policy 13.21.4 to read as follows - additions are indicated by [ ]: Policy 13.21.4 – Additional AMAs in the Enclosed Waters CMUs (AMAs that are not to provide for existing marine farms or the relocation of existing marine farms), and AMAs in Near-shore CMUs, and [new] marine farms in the offshore CMUs [that do not have an existing coastal permit] are not appropriate in
	62	The Marlborough Environment Centre	Tim Newsham	62.5	Neutral	Amend the policy as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming.
	70	Nelson Marlborough Conservation Board	Kath Inwood	70.13	Oppose	Amend Policies 13.21.1-6 as required to ensure that no new AMA space is allocated in CMU 44 Waitata Reach for marine farming.
	86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.3	Neutral	Add (e) Coastal Section Outer Pelorus 9 and; Chetwode Islands, Titi Island and Forsyth Island CMU's.
	89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.6	Neutral	This should also include the area designated by the Harbourmaster for Cruise boat transport.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.15	Neutral	Accordingly, we submit that the following areas (currently CMZ 1 areas under the MSRMP) be added to Policy 13.21.4(a): • Tuhitarata Bay, in Beatrix Bay • The head waters of Clova Bay • Hopai Bay in Crail Bay • The north side of Kenepuru Sound from Skiddaw Bay around to Mills Bay • The south side of Kenepuru Sound from Broughton Bay to the Kenepuru Heads
	2	McLennan	Neil McLennan	2.4	Oppose	CMUs and AMAs may need further consideration. Provide for experimental and onshore aquaculture.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.31	Neutral	Change to ‘[C]’ policy rather than ‘[RPS]’ policy; AND Amend the words of Policy 13.21.4 to read “...Near-shore CMUs, and new marine farms in the offshore CMUs that do not have an existing coastal permit are not appropriate in: ...”
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.32	Neutral	Amend 13.21.4(a) by adding: “...with the exception of the Queen Charlotte College line in Shakespeare Bay”

	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.33	Neutral	Make the consequential change if the definition of the National Transportation Route is altered in other appeals. Make reference to the side bays being excluded in the explanatory text below the policy in line with this paragraph.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.34	Support	Retain provision Policy 13.21.4(c)
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.35	Support	Retain provision Policy 13.21.4(d)
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.7	Support	Retain as notified, except for changes as to improve clarity and effectiveness set out in submission.
	40	Tester	Jonathon Tester	40.6	Oppose	Policies relating to Outstanding Natural Landscapes (including, but not limited to, Policies 13.21.3; 13.21.4; and 13.21.6) - Amend policies to recognise that not all of these criteria need to apply in every case and to give greater recognition that marine farms are appropriate within some ONLs.
Policy 13.21.5	24	Marlborough District Council	Louise Walker	24.8	Support	Remove reference to 'Values Report' and associated wording, as shown below (text to be deleted between [ ]): To create a new additional AMA, a plan change or variation is required. This policy provides additional guidance on when a new AMA may be considered appropriate. This includes key considerations of the natural and human use values of the Marlborough Sounds and consideration of monitoring of cumulative adverse effects. [Many of these values are identified in the Values Report prepared in 2018 as part of the development of these provisions].
	32	The NZ Rock Lobster Industry Council (NZRLIC) and The Pāua Industry Council (PIC).	Mark Edwards	32.2	Oppose	Policy 13.21.5(b)(ii) should be amended to read – no reefs, biogenic habitats, cobble habitats or algae beds or habitat of particular significance for fisheries management within 50 metres of the AMA that may be significantly adversely affected by the operation of the marine farm;
	85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.9	Oppose	Amend Policy 13.2.5 by adding at the start the words: "Other than in the Enclosed CMU 38A Te Tai o Marokura (T)he appropriateness of ..."  and add to the end of the policy the words: "The establishment of any marine farm or any AMA within the CMUs for Te Tai o Marokura shall be managed in accordance with Policy 13.21.8."
	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.17	Neutral	1. What is needed is an extraordinary activity threshold that must be met before more AMA's can be added within the Sounds. We submit that policy 13.21.5 be amended to the effect that a new AMA must be for an aquaculture activity that cannot, for biophysical or hydrodynamic reasons, be undertaken within the existing AMA space in the Sounds. 2. We submit that a cumulative effect paragraph must be added to the policy before paragraph (a). This new paragraph should provide that a new AMA must not be created if it is likely to result in or contribute to the exceedance of any of the cumulative effect thresholds identified in proposed new Policy 13.21.3.1 above. 3. Paragraph (a) should not refer to a CMU as effects can cross CMU boundaries. Rather, it should refer to the 'area of influence'. An area of influence is self-explanatory – it is the area that the activities actually influence. 4. As noted in section 4 above, paragraph (a) is crafted on the ASC Standard for benthic effects and does not facilitate any regard to cumulative effects. The new paragraph submitted for in (1) above (which includes application of the ASC Standard for pelagic effects) must be included to effect any cumulative limit. 5. Paragraph (c) is far too narrow and is inappropriately worded. We submit that this paragraph should be rewritten as follows: " the location of an AMA and subsequent marine farm will not narrow any navigable channel resulting in a speed restriction nor otherwise have any more than minor adverse effects on navigation, including by encroachment on lines of point to point navigation" ( 6. It is not appropriate that regard only be had to amenity values to the extent that they are affected by lights or noise from proposed farm activity. Paragraph (e) should thus be amended to require regard to be had to the matters referred to at Issue 13O, including visual amenity broadly. 7. In paragraphs (b)(ii), (d) and (e) "significant" effects should be replaced by "no more than minor" effects. A plan change in an environment that is already considered to be full should demand adverse effect thresholds that are, at the very least, as stringent as they are when applying for a non-complying resource consent under section 104D(1)(a). 8. There is reference to a Values Report 2018. We submit that it should be made clear: • That values are dynamic matters of fact that cannot be dictated by a plan and that the Values Report has not been notified and consulted on and as such it does not form part of V1. • That the Values Report is also not intended to be comprehensive, nor is it intended to be a representation or constraint on Council's view on the values for any area, and nor is it intended to be representative of the values held by the communities or other stakeholders in areas.



109	Guardians of the Sounds Inc	Clare Pinder and William Foster	109.3	Oppose	Marine Farms: Ideally the distance should be 500 metres. Salmon Farms: The distance from ecologically significant sites from a salmon farm should be 1 km. These farms are using the sea to disperse waste from their activities and should ideally be land based where pollutants can be managed. It is no longer acceptable for human and dairy farm waste to be discharged into waterways. Fin fish farming is no different.
62	The Marlborough Environment Centre	Tim Newsham	62.6	Neutral	Amend the policy as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming.
70	Nelson Marlborough Conservation Board	Kath Inwood	70.14	Oppose	Amend Policies 13.21.1-6 as required to ensure that no new AMA space is allocated in CMU 44 Waitata Reach for marine farming.
111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.23	Neutral	Add the principle : "Away from areas of particular significance to iwi." [inferred]
89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.7	Neutral	To always publically notify the creation of an AMA.
90	Clova Bay Residents Association Incorporated	Trevor Offen	90.16	Neutral	1. What is needed is an extraordinary activity threshold that must be met before more AMA's can be added within the Sounds. We submit that policy 13.21.5 be amended to the effect that a new AMA must be for an aquaculture activity that cannot, for biophysical or hydrodynamic reasons, be undertaken within the existing AMA space in the Sounds. 2. We submit that a cumulative effect paragraph must be added to the policy before paragraph (a). This new paragraph should provide that a new AMA must not be created if it is likely to result in or contribute to the exceedance of any of the cumulative effect thresholds identified in proposed new Policy 13.21.3.1 above. 3. Paragraph (a) should not refer to a CMU as effects can cross CMU boundaries. Rather, it should refer to the 'area of influence'. An area of influence is self-explanatory – it is the area that the activities actually influence. 4. As noted in section 4 above, paragraph (a) is crafted on the ASC Standard for benthic effects and does not facilitate any regard to cumulative effects. The new paragraph submitted for in (1) above (which includes application of the ASC Standard for pelagic effects) must be included to effect any cumulative limit. 5. Paragraph (c) is far too narrow and is inappropriately worded. We submit that this paragraph should be rewritten as follows: " the location of an AMA and subsequent marine farm will not narrow any navigable channel resulting in a speed restriction nor otherwise have any more than minor adverse effects on navigation, including by encroachment on lines of point to point navigation" ( 6. It is not appropriate that regard only be had to amenity values to the extent that they are affected by lights or noise from proposed farm activity. Paragraph (e) should thus be amended to require regard to be had to the matters referred to at Issue 13O, including visual amenity broadly. 7. In paragraphs (b)(ii), (d) and (e) "significant" effects should be replaced by "no more than minor" effects. A plan change in an environment that is already considered to be full should demand adverse effect thresholds that are, at the very least, as stringent as they are when applying for a non-complying resource consent under section 104D(1)(a). 8. There is reference to a Values Report 2018. We submit that it should be made clear: • That values are dynamic matters of fact that cannot be dictated by a plan and that the Values Report has not been notified and consulted on and as such it does not form part of V1. • That the Values Report is also not intended to be comprehensive, nor is it intended to be a representation or constraint on Council's view on the values for any area, and nor is it intended to be representative of the values held by the communities or other stakeholders in areas.
2	McLennan	Neil McLennan	2.5	Oppose	CMUs and AMAs may need further consideration. Provide for experimental and onshore aquaculture.
2	McLennan	Neil McLennan	2.9	Oppose	Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits.
83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.7	Oppose	Delete this policy
72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.36	Neutral	Replace "[RPS]" with "[C]". AND Replace "s 360" with "s 360A". AND Amend text of Policy 13.21.5 to include "applied for after Variation 1 becomes operative" after the words "additional AMAs".
72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.37	Neutral	Policy 13.21.5(a). Amend sub-policy (a) to require both positive and adverse effects to be considered. Delete the words beginning "without more..." to end of sub-policy.
72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.38	Neutral	Policy 13.21.5(b) - Change "within 50 metres" in sub-paragraphs (i) and (ii) to "within 20 metres".

	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.8	Neutral	Retain as notified, except for changes as to improve clarity and effectiveness set out below. Reword the policy as follows or to like effect: "Where they are not inappropriate under Policy 13.21.4, the appropriateness of additional AMAs in the enclosed Waters CMUs and AMAs in the Near-shore CMUs will be assessed..."
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.12	Neutral	Amend Policy 13.21.5 to: a) Clarify the link and interactions between the policy and the criteria in Policy 13.21.3 b) Ensure the policy has appropriate requirements to enable the establishment of additional AMAs for novel aquaculture that does not involve conventional longline marine farming and FAMAs for finfish farming (or develop a new policy to cover this) c) Clarify how Policy 13.21.5(a) is intended to apply in situations where there are no marine farms currently in a CMU d) Ensure the policy sets appropriate thresholds and requirements that will enable the establishment of additional AMAs (including for novel aquaculture methods and species) in a timely manner e) Ensure the policy sets appropriate thresholds and requirements for the establishment of additional FAMAs f) Clarify what the following terms mean: • Cobble habitats • Algae beds • Significantly narrow Amend the explanation of Policy 13.21.5 as follows: ...a[n] [deleted] [amendment] to a regional coastal plan made [deleted], by Order in Council [by the Governor-General,] under the regulations of s360[A] of the Act, [on the recommendation of the Minister of Aquaculture].
Policy 13.21.6	24	Marlborough District Council	Louise Walker	24.9	Support	Remove reference to 'Values Report' and associated wording, as shown below (text to be deleted between [ ]): The appropriateness of marine farms within the offshore CMU will be assessed considering adverse effects on any of the natural and human use values of the coastal marine area [including those identified in the Values Report 2018] and may be provided for when they are located ...
	32	The NZ Rock Lobster Industry Council (NZRLIC) and The Pāua Industry Council (PIC).	Mark Edwards	32.3	Oppose	Policy 13.21.6(g)(ii) should be amended to read – reefs, biogenic habitats, cobble habitats or algae beds or habitat of particular significance for fisheries management that may be significantly adversely affected by the operation of a marine farm; and  A new clause should be added to Policy 13.21.6 to read – (x) outside areas that are important for customary, commercial or recreational fishing where fishing activity may be significantly adversely affected by the operation of a marine farm.
	78	Hughes	Ciaran Hughes	78.7	Oppose	Amend the policies to recognise that not all of those criteria need to apply in every case and to give greater recognition that marine farms are appropriate within some ONLs.
	85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.10	Oppose	Amend Policy 13.21.6 by adding at the start the words: "Except for the CMUs 38A and 8A for Te Tai o Marokura, (A)additional..."  and add to the end of the policy the words: "The establishment of any marine farm or any AMA within the CMUs for Te Tai o Marokura shall be managed in accordance with Policy 13.21.8."
	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.18	Neutral	1. Reference to Values Report should be deleted. 2. "recognised navigation routes" should, for this purpose, be defined in the same way as proposed for policy 13.21.3. 3. paragraph (c) should be rewritten to something along the lines as follows: "Outside of areas that are likely, singularly or cumulatively, to have a more than minor adverse effect on the feeding or breeding activities of NZ King Shag, elephant fish, dolphins, high value recreational fish species including cod, sole, flounder snapper or kawahai, and other important species" 4. Paragraphs (g) and(h) set a threshold for effects of 'significant'. This is inappropriate. The threshold for effects such as these should be no more than minor. 5. A new paragraph should be added requiring that applications for marine farms under this policy must also demonstrate that the proposed activity will comply with the pelagic effects standard as prescribed by paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019.
	109	Guardians of the Sounds Inc	Clare Pinder and William Foster	109.4	Oppose	Marine Farms: Ideally the distance should be 500 metres. Salmon Farms: The distance from ecologically significant sites from a salmon farm should be 1 km. These farms are using the sea to disperse waste from their activities and should ideally be land based where pollutants can be managed. It is no longer acceptable for human and dairy farm waste to be discharged into waterways. Fin fish farming is no different.
	110	Kenepuru and Central Sounds Residents' Association	Andrew Caddie	110.10	Neutral	We note rule 16.6 but nevertheless recommend that the introduction to this Policy 13.21.16 be changed so that it refers within the policy at the start ' The appropriateness of marine farms within the offshore [sic] CMU will be classified as discretionary activities and will be assessed ....' The opening paragraph of this policy should also go on to say "....and may be provided for, by way of example and not limitation, when they are located ...."

110	Kenepuru and Central Sounds Residents' Association	Andrew Caddie	110.11	Oppose	Accordingly we recommend that the distinction be made to the introduction of this sub clause and wording added along the lines of "In the case of an AMA for bivalve farming more than 100 metres and in the case of a Finfish AMA more than 1800 metres from...." We recommend deleting the word "significantly" in clause 9g) (ii) to better ensure compliance with the NZCPS and Part 2 of the RMA. We note the use of the word "Outside" in sub clauses (a) to (g) is rather vague and underlines the need for such areas to have significant buffer zones given the large volumes of waste generated from a Finfish farm over a large footprint.
34	CLIFFORD BAY MARINE FARMS LTD	Quentin Alexander Muir Davies and Kerry Morgan Moor	34.2	Neutral	Amend policy 13.21.6 to read as follows - additions are indicated by [ ]: Policy 13.21.6 – The appropriateness of [new] marine farms (that is farms for which no resource consent has been held) within the offshore CMU will be assessed considering adverse effects on any of the natural and human use values of the coastal marine area including those identified in the Values Report 2018 and may be provided for when they are located: ...
107	Ngāi Tahu Seafood	Thomas Hildebrand	107.9	Neutral	Define 'recognised navigational routes'. Amend Policy 13.21.6(b) as follows (insert between * _*, delete between [ ]): 'Outside areas *where marine farming would adversely affect* significant breeding or feeding habitat for New Zealand King Shag, elephant fish, dolphins and [other important species]' and include other species rather than the current catch-all phrase.  The Values Report 2018 does not appear to be readily available.
62	The Marlborough Environment Centre	Tim Newsham	62.7	Neutral	Amend the policy as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming.
89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.8	Neutral	Amend policy 13.21.6(d) to add and other Important species.
90	Clova Bay Residents Association Incorporated	Trevor Offen	90.17	Neutral	1. Reference to Values Report should be deleted. 2. "recognised navigation routes" should, for this purpose, be defined in the same way as proposed for policy 13.21.3. 3. paragraph (c) should be rewritten to something along the lines as follows: "Outside of areas that are likely, singularly or cumulatively, to have a more than minor adverse effect on the feeding or breeding activities of NZ King Shag, elephant fish, dolphins, high value recreational fish species including cod, sole, flounder snapper or kawahai, and other important species" 4. Paragraphs (g) and(h) set a threshold for effects of 'significant'. This is inappropriate. The threshold for effects such as these should be no more than minor. 5. A new paragraph should be added requiring that applications for marine farms under this policy must also demonstrate that the proposed activity will comply with the pelagic effects standard as prescribed by paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019.
92	Sanford Limited	Alison Undorf-Lay	92.10	Oppose	Amend to 50 to read 20m
2	McLennan	Neil McLennan	2.6	Oppose	CMUs and AMAs may need further consideration. Provide for experimental and onshore aquaculture.
61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.5	Neutral	Adopt MFA/AQNZ submission: Delete reference to "Values Report 2018" (otherwise include definition as per above submission). Amend text of policy to read "The appropriateness of new marine farms (for which no prior resource consent has been granted) within..." Amend (c) to read: "Outside areas where marine farming would adversely affect significant habitat of the New Zealand King Shag, elephant fish, dolphins and other important species." Amend (d) to read: Replace "more than minor" with "significant" Amend (e) to read: Replace "areas of ecologically significant marine biodiversity shown on the Volume 4 planning maps" with "Ecologically Significant Marine Sites, identified as Category A and B sites in Appendix 27." The second (e) should read (f). Delete (g) Additional Decisions Sought by Wakatū/Kono - New Consents Applied for by Existing Marine Farms - Wakatū also seeks that the Council amend Policy 13.2.6 (or add a new additional policy) to provide that new consents for existing marine farms within Offshore CMUs are provided for as controlled activities; or alternatively that AMAs are established to provide for the area of existing marine farms within Offshore CMUs (and that new consent applications within those AMAs are then provided for as a controlled activity). Reference to the 'Values Report 2018' – Remove reference to 'Values Report 2018' and if necessary include any identified values that form part of the assessment in the Policy or in a Schedule to the Plan.
83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.8	Neutral	Additional Policy: Prior to establishing the appropriateness of future applications in the offshore areas of the Marlborough Sounds, comprehensive surveys will be carried out to establish the spatial distribution of new to be identified marine significant areas.

	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.39	Neutral	Delete reference to "Values Report 2018" (otherwise include definition as per above submission). Amend text of policy to read "The appropriateness of [new] marine farms [(for which no prior resource consent has been granted)] within..."
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.40	Neutral	Policy 13.21.6(c) - The wording of this provision is identical to Policy 13.21.3(e). For the same reasons, the same changes should be made to this provision. Amend the policy to read: "Outside areas where marine farming would adversely affect significant habitat of the New Zealand King Shag, elephant fish, dolphins and other important species."
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.41	Neutral	Policy 13.21.6(d) Replace "more than minor" with "significant"
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.42	Neutral	Policy 13.21.6(e) Replace "areas of ecologically significant marine biodiversity shown on the Volume 4 planning maps" with "Ecologically Significant Marine Sites, identified as Category A and B sites in Appendix 27."
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.43	Oppose	Policy 13.21.6(e) Correct the numbering (2 x sub-policy (e)). The second (e) should read (f).
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.44	Oppose	Delete (g)
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.9	Support	Retain as notified, except for changes as to improve clarity and effectiveness set out below. Reword the policy as follows or to like effect: "The appropriateness of marine farms within the offshore CMU will be assessed considering adverse effects on any of the natural and human use values of the coastal marine area including those identified in the Values Report 2018 and marine farms within the offshore CMU may be provided for when they are located:..."
	40	Tester	Jonathon Tester	40.7	Oppose	Policies relating to Outstanding Natural Landscapes (including, but not limited to, Policies 13.21.3; 13.21.4; and 13.21.6) - Amend policies to recognise that not all of these criteria need to apply in every case and to give greater recognition that marine farms are appropriate within some ONLs.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.13	Neutral	Amend Policy 13.21.6 to clarify what the following terms mean: • Cobble habitats • Algae beds Create additional policies recognising the potential for open ocean aquaculture and providing a clear consenting pathway that facilitates development of open ocean aquaculture while recognising and managing its novel and new aspects compared to traditional inshore aquaculture.
Policy 13.21.7	9	Littlefield	Rod Littlefield	9.1	Oppose	Variation 1A Oppose finfish farming in the Marlborough sounds
	18	Wright	Richard and Christine Wright	18.1	Oppose	Variation 1A - Proposed Fin Fish - AMA Finfish 6 Opposes the proposed fin fish farm location.  (Inferred)
	24	Marlborough District Council	Louise Walker	24.11	Support	Amend 13.21.7 to remove the word 'within' to read: (ii) monitoring in accordance with Policy 13.22.1 shows that the current scale of marine farming in the CMU is not having a significant effect on the natural and human use values of the CMU and that additional marine farming activities can be undertaken without creating a significant adverse effects on the natural and human use values of the CMU.
	78	Hughes	Ciaran Hughes	78.10	Neutral	Amend to make it clear that where an existing farm needs to be relocated an area for relocation must be provided which is "equivalent". 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	Hughes	Ciaran Hughes	78.11	Neutral	Amend the variation to remove the requirement that there be no increase to the total area occupied by structures/size of the marine farm.  The provisions should permit a large overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA).

85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.11	Support	Add a new Policy 13.21.8 to provide for the management of new marine farms within both the enclosed waters and open coastal waters that fall within the takiwā of Ngāi Tahu. This policy should be developed in consultation with Te Rūnanga o Ngāi Tahu and Te Rūnanga o Kaikōura to determine how proposed Objective 31.21 applies within the Ngāi Tahu takiwā. These provisions should be inserted into the Proposed Marlborough Environment Plan by way of a variation once complete.  Renumber subsequent policies accordingly.
85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.15	Oppose	Amend proposed Policy 13.21.7(6) by adding at the start the words: "Except for the CMUs 38A and 8A for Te Tai o Marokura, (A)authorisations for finfish farms..."  and add to the end of the policy the words: "The establishment of any finfish farm within the CMUs for Te Tai o Marokura shall be managed in accordance with Policy 13.21.8."  Add an appropriate policy for finfish farming in both enclosed and open waters within the Ngāi Tahu takiwā after consultation with Te Rūnanga of Ngāi Tahu and Te Rūnanga o Kaikōura, and add to the proposed plan by way of a variation.
91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.19	Neutral	1. We support the policy of managing demand for coastal marine space by way of an allocation scheme. 2. Policy 13.21.7(b) be amended by adding the wording as indicated below: For space in AMAs created as part of the notified variation to the plan, other than FAMAs, and subject to any need to control or regulate activity in order to manage environmental issues including cumulative effects, authorisations for marine farming..... 3. Policy 13.21.7(b) should be amended as follows: (1) The second sentence in paragraph (b) should be changed to read: "Subject to paragraph (g), Council shall have discretion as to where and to what extent an existing consent holder is granted an allocation right or rights in an AMA. In exercising this discretion Council shall adopt the following principles: (2) At the beginning of each of paragraphs (b)(i) to (iv) add the words: "Where possible and to the degree that Council in its discretion determines," (3) Add a new paragraph (ba) as follows: (ba) Council may elect to move to publicly tender some or all authorisations for an AMA or AMAs created as part of the notified variation to the plan if and to the extent that Council considers the allocation procedure under paragraph (b) to be impractical or inefficient to implement. 4. Our submission is thus that Council has made an inadequate assessment and has failed to meet the threshold required by section 165H(1) of the Resource Management Act 1991 to allocate consent rights other than by way of tender. 5. we submit that the following new policy (g) is required: (g) Allocations for second term resource consents in AMAs created as part of the notified variation to the plan or by private plan change shall be publicly tendered. 6. We support paragraph (c) of Policy 13.21.7 7. we submit that paragraph (d)(ii) be replaced with the following: Filter feeding aquaculture in the relevant area of influence is and will remain within the limits prescribed in the pelagic effects standard in paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019 and the additional marine farming activities can be undertaken without more than minor adverse effects on the human use values of the relevant area. 8. Subject to our comments on public tendering above, we support paragraph (e). 9. Paragraph (f) should commence with the words "Subject to paragraph (g)".
110	Kenepuru and Central Sounds Residents' Association	Andrew Caddie	110.3	Neutral	Amend title to read "Authorisation Methodology – AMAs and FAMAs"
110	Kenepuru and Central Sounds Residents' Association	Andrew Caddie	110.4	Neutral	13. 21.7(h) be changed to "finfish marine farming" Amend ambiguity between the use of "same space", consented area and the definition of marine farm
110	Kenepuru and Central Sounds Residents' Association	Andrew Caddie	110.5	Oppose	We recommend the deletion of the references to Waitata Reach CMU and Maud Island CMU in sub clause (h)(ii).
110	Kenepuru and Central Sounds Residents' Association	Andrew Caddie	110.6	Oppose	These historical errors when siting marine farms should not we submit be "grandfathered" into the future.
62	The Marlborough Environment Centre	Tim Newsham	62.1	Neutral	Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 28 Maud Island, CMU 44 Waitata Reach and CMU 42 Tory Channel for finfish farming.
70	Nelson Marlborough Conservation Board	Kath Inwood	70.6	Oppose	Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 28 Maud Island and CMU 44 Waitata Reach for finfish farming.
111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.3	Oppose	It is important that a sunset date is applied to all consents and that the rolling process results in re-tendering; a just position. This retendering should be weighted, first for iwi, second for local people and then for others.

	88	New Zealand Sports Fishing Council	Helen Pastor	88.3	Oppose	For Marlborough District Council to revert any unoccupied FAMA spaces to more natural environments. For Marlborough District Council to not issue any permits for non-Finfish marine farms. To revert unoccupied FAMA spaces to a more natural environment
	89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.20	Oppose	Remove final paragraph as proposed as it is not appropriate as per different environmental effects and could have effects on the monitoring of finfish effects in the surrounding area.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.18	Support	<p>1. We support the policy of managing demand for coastal marine space by way of an allocation scheme.</p> <p>2. Policy 13.21.7(b) be amended by adding the wording as indicated below: For space in AMAs created as part of the notified variation to the plan, other than FAMAs, and subject to any need to control or regulate activity in order to manage environmental issues including cumulative effects, authorisations for marine farming.....</p> <p>3. Policy 13.21.7(b) should be amended as follows: (1) The second sentence in paragraph (b) should be changed to read: "Subject to paragraph (g), Council shall have discretion as to where and to what extent an existing consent holder is granted an allocation right or rights in an AMA. In exercising this discretion Council shall adopt the following principles: (2) At the beginning of each of paragraphs (b)(i) to (iv) add the words: "Where possible and to the degree that Council in its discretion determines," (3) Add a new paragraph (ba) as follows: (ba) Council may elect to move to publicly tender some or all authorisations for an AMA or AMAs created as part of the notified variation to the plan if and to the extent that Council considers the allocation procedure under paragraph (b) to be impractical or inefficient to implement.</p> <p>4. Our submission is thus that Council has made an inadequate assessment and has failed to meet the threshold required by section 165H(1) of the Resource Management Act 1991 to allocate consent rights other than by way of tender.</p> <p>5. we submit that the following new policy (g) is required: (g) Allocations for second term resource consents in AMAs created as part of the notified variation to the plan or by private plan change shall be publicly tendered.</p> <p>6. We support paragraph (c) of Policy 13.21.7</p> <p>7. we submit that paragraph (d)(ii) be replaced with the following: Filter feeding aquaculture in the relevant area of influence is and will remain within the limits prescribed in the pelagic effects standard in paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019 and the additional marine farming activities can be undertaken without more than minor adverse effects on the human use values of the relevant area.</p> <p>8. Subject to our comments on public tendering above, we support paragraph (e).</p> <p>9. Paragraph (f) should commence with the words "Subject to paragraph (g)".</p>
	92	Sanford Limited	Alison Undorf-Lay	92.11	Neutral	Delete and replace this policy and associated rules and methods with provisions establishing the layout for marine farming in the Marlborough Sounds after the Plan becomes operative. That should include the layout of both the AMA generally and where individual marine farms within it are to be located, which consent holders can apply, and in what locations; inside each AMA - i.e. as set out in the MAF-AQNZ yellow-line version. As much as possible, all marine farm (backbone length) relocations should be predetermined and allocated on revised CMU maps. Sanford has provided a full set of revised CMU maps with this submission, proposing how the above can be achieved while ensuring Sanford retains the same amount of authorised farming space. Within each AMA, identify the individual farms and where they move from and to: (a) Where the farm's position and the direction of lines are the same or less, this move should be a controlled activity. (b) Where the intention is to lay out the farm blocks differently, e.g. a different orientation, it should be a restricted discretionary activity with limited notification to adjoining marine farm owners. (c) Within each of the sites, identify the areas which are farmable (i.e. areas that would contain the farmed species/growing structures and areas which would only be used for moorings); and (d) To record the above in an integrated Sounds-wide map and corresponding database, detailing where every longline will be moved from and where it will be moved to. (e) Where an AMA lacks space for a farm to move into (e.g. Sanford Site 8539), there should be a process for the permit holder to relocate lost lines into equivalent space elsewhere in the Sounds. For example, Sanford Sites 8511 and Site 8512 could be extended with less than a minor impact on CMU integrity. (e) the Plan should provide for this reconciliation as described above as a controlled activity.

	92	Sanford Limited	Alison Undorf-Lay	92.12	Neutral	<p>Policy 13.21.7(b)(i) - Delete the words from “to accommodate” through to the end of the sentence.</p> <p>Policy 13.21.7(b)(ii) - Amend to so that same space is measured as a combination of backbone metres and production quality, i.e. pick up nuances of ‘same.’</p> <p>Policy 13.21.7(b)(iii) Refer to Sanford submission in respect of policy 13.21.7 for the alternative allocation regime method.</p> <p>Policy 13.21.7(b)(iv) - Replace “space” with “equivalent space” in both locations where that word is found. Provide guidance in the policy for moving or amending the proposed AMA line, i.e. where equivalent space in an alternative location is not provided; AMAs should be created in the existing farm’s location. For example where: - 1. AMA space is not provided for a farm; 2. Alternative AMA space is too small; 3. AMA is not equivalent, does not have the same use-value; 4. There is no room in the AMA adjacent to the site; 5. Incurs significant relocation costs/effort for minimal benefit; 6. Could give rise to community concerns as to whether the move into the AMA creates disbenefits, e.g. Site 8283 and navigation</p> <p>Policy 13.21.7(c)- Delete the words “before any new marine farm consents can be exercised” and replace with “while allowing a transition period of up to 24 months”.</p> <p>Policy 13.21.7(d) - Delete “or the extension of Existing Marine Farms in AMAs”. (Also seeking related definition amendment).</p> <p>Insert a new paragraph that would enable the extension of marine farming sites where appropriate environmental standards are met to provide additional lines, i.e. to offset lost backbone lines elsewhere from a farm in the same ownership.</p>
	2	McLennan	Neil McLennan	2.7	Oppose	CMUs and AMAs may need further consideration. Provide for experimental and onshore aquaculture.
	2	McLennan	Neil McLennan	2.22	Oppose	No entitlement for an alternative area for inappropriate farms
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.6	Support	<p>Adopt MFA/AQNZ Decision Sought: This seeks that the policy be amended to provides for:</p> <p>(a) The marine farm mapping to identify on a line by line basis which consent holder as at 2 December 2020 (or their successor) (“existing consent holder”) may apply for each line.</p> <p>(b) Existing consent holders may agree to their own arrangements, provided that no existing consent holder may obtain an increase in consented backbone length from the situation as at 2 December 2020.</p> <p>(c) No consent holder shall be allocated space immediately inshore or offshore of another existing consent holder, except where that situation presently exists.</p> <p>(d) Priority to space is to be given to the farmer who presently occupies that space. Farmers may be required to move to accommodate other farms moving into a ribbon.</p> <p>(e) Where insufficient space in a particular AMA arises, efforts should be made to find other equal length of backbone within that CMU.</p> <p>(f) Where insufficient space exists within AMAs in an entire CMU, alternative space for equal length of backbone will be found in another CMU.</p> <p>(g) Any space which remains after all allocation within all CMUs is complete (ie. each existing consent holder has obtained equal length of backbone), any remaining AMAs will be allocated by authorisation, subject to (c) above, as follows:</p> <p>a. Within the Enclosed Water CMUs</p> <p>i. The space will be held for a period of 6 years from the date the Plan became operative as space within which the Council will issue authorisations to farmers who are unsuccessful in their applications under Part 9A of the Fisheries Act 1996, or for some other reason are not able to move to the lines which they have been allocated; and then</p> <p>ii. The space will be removed or allocated by a future plan change.</p> <p>b. Beyond the Enclosed Water CMUs</p> <p>i. The space will be offered to the party who has contributed substantial technical or scientific information to enable the AMA to be created (if any); and then ii. The space will be offered to iwi as settlement space<sup>29</sup>; and then</p> <p>iii. The space is to be publicly tendered.</p> <p>Additional Relief Sought by Wakatū/Kono: Amend policy so it is not necessary to obtain an authorisation for an existing marine farm when it is not required to relocate any of the farm into new space – in that situation consent should be able to be applied for directly as a controlled activity without first needing an authorisation.</p>

61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.7	Neutral	<p>Wakatū adopts and seeks the Relief Sought by MFA/AQNZ in respect of Policy 13.21.7, sub policies (b) – (d), as follows:</p> <p>(b) Delete “the notified variation to the plan” and replace with “Variation 1”. Clarify whether this also applies to FAMAs.</p> <p>(i) Delete the words beginning “to accommodate” to the end of the sentence.</p> <p>(ii) Clarify meaning of “the same” in light of other MFA/AQNZ submission points.</p> <p>(iii) Amend to reflect the changes sought to Policy 13.31.7. However, if that alternative relief is not granted, then enable authorisations to be given to a marine farmer for their farm to occupy the available space in the relevant AMA ribbon.</p> <p>(iv) Replace “space” with “equivalent space” in both locations where that word is found. Where equivalent space in an alternative location is not provided for (eg. Alternative AMA space is too small, is not equivalent, or is removed via submissions in opposition), then AMAs should be created in the location of existing farms.</p> <p>(c) Delete the words “before any new marine farm consents can be exercised” and replace with “while allowing a transition period of up to 24 months”.</p> <p>(d) Delete “or the extension of Existing Marine Farms in AMAs”. Amend the definition of marine farms so that it is clear it relates to whole sites and locations contiguous with existing marine farms. Insert a new paragraph which would enable the extension of marine farming sites where appropriate environmental standards are met.</p> <p>Additional Relief Sought by Wakatu/Kono: Amend wording in policies 13.21.7(a) and (b) so that it allows greater flexibility to ensure that the equivalent farm space is retained. Allow for a buffer beyond the boundaries of the AMA for situations where a marine farm cannot wholly relocate.</p> <p>13.21.7(c) – Further to the MFA/AQNZ submission, Wakatū/Kono seeks an addition which would also enable the readjustment of a marine farming site, where appropriate environmental standards are met.</p>
27	Ayakulik Limited	Peter Radich	27.2	Oppose	To remove the extension of Existing Marine Farms from the allocations processes contemplated by Policy 13.21.7 (so that such extensions are able to be applied for by resource consent as a discretionary activity).
83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.13	Oppose	Variation 1A: Friends opposes all new Finfish Aquaculture Management Areas (and new Aquaculture Management Areas in prohibited areas of the operational Plan):
49	PHR Processing Limited	Quentin Davies and Kerry Moor	49.3	Support	Support in part - Clarify what 'equivalent space' for displaced farms means [inferred]
72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.45	Neutral	<p>Oppose in part - This policy needs to be amended so that it provides for: (a) The marine farm mapping to identify on a line by line basis which consent holder as at 2 December 2020 (or their successor) (“existing consent holder”) may apply for each line. (b) Existing consent holders may agree to their own arrangements, provided that no existing consent holder may obtain an increase in consented backbone length from the situation as at 2 December 2020. (c) No consent holder shall be allocated space immediately inshore or offshore of another existing consent holder, except where that situation presently exists. (d) Priority to space is to be given to the farmer who presently occupies that space. Farmers may be required to move to accommodate other farms moving into a ribbon. (e) Where insufficient space in a particular AMA arises, efforts should be made to find other equal length of backbone within that CMU. (f) Where insufficient space exists within AMAs in an entire CMU, alternative space for equal length of backbone will be found in another CMU. (g) Any space which remains after all allocation within all CMUs is complete (ie. each existing consent holder has obtained equal length of backbone), any remaining AMAs will be allocated by authorisation, subject to (c) above, as follows: a. Within the Enclosed Water CMUs i. The space will be held for a period of 6 years from the date the Plan became operative as space within which the Council will issue authorisations to farmers who are unsuccessful in their applications under Part 9A of the Fisheries Act 1996, or for some other reason are not able to move to the lines which they have been allocated; and then ii. The space will be removed or allocated by a future plan change. b. Beyond the Enclosed Water CMUs i. The space will be offered to the party who has contributed substantial technical or scientific information to enable the AMA to be created (if any); and then ii. The space will be offered to iwi as settlement space<sup>29</sup>; and then iii. The space is to be publicly tendered.</p>
72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.46	Neutral	Policy 13.21.7(b) Delete “the notified variation to the plan” and replace with “Variation 1”. Clarify whether this also applies to FAMAs.
72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.47	Neutral	Policy 13.21.7(b)(i) Delete the words beginning “to accommodate” to the end of the sentence.
72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.48	Neutral	Policy 13.21.7(b)(ii) Clarify meaning of “the same” in light of other MFA/AQNZ submission points.
72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.49	Neutral	Policy 13.21.7(b)(iii) Refer submission in respect of policy 13.21.7 for alternative allocation regime. If alternative relief is not granted, then enable authorisations to be given to a marine farmer for their farm to occupy the available space in the relevant AMA ribbon.



72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.50	Neutral	Policy 13.21.7(b)(iv) Replace "space" with "equivalent space" in both locations where that word is found. Where equivalent space in an alternative location is not provided for (eg. Alternative AMA space is too small, is not equivalent, or is removed via submissions in opposition), then AMAs should be created in the location of existing farms.
72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.51	Neutral	Policy 13.21.7(c) Replace "space" with "equivalent space" in both locations where that word is found. Where equivalent space in an alternative location is not provided for (eg. Alternative AMA space is too small, is not equivalent, or is removed via submissions in opposition), then AMAs should be created in the location of existing farms.
72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.52	Oppose	Delete "or the extension of Existing Marine Farms in AMAs". Amend the definition of marine farms so that it is clear it relates to whole sites and locations contiguous with existing marine farms. Insert a new paragraph which would enable the extension of marine farming sites where appropriate environmental standards are met.
48	PH Redwood & Company Limited	Quentin Davies and Kerry Moor	48.5	Oppose	The proposed plan for allocating 'equivalent space' for displaced farms needs to be clarified. It considers that: (a) 'Equivalent space' (eg Policy 13.21.7(b)(i)) must mean space with the same farming characteristics as the existing space. In respect of Site 8164 that means the same spat retention characteristics, and the same MSQP regime. It is unreasonable to expect a farmer to surrender an existing marine farm with no assurance that the proposed replacement will be a fair substitution. In respect of farm 8164, particularly given the points above regarding the particular characteristics of this site, it is concerned it won't receive like for like. It does not consider that a site in Richmond Bay would be a suitable substitute. (b) The proposed process places unfair risks on small industry players. (c) The timeframes provided for the relocation of mussel farms are impractical. Relocation of farms takes a great amount of time and expense. There are only 2 or 3 boats in the Sounds that are capable of installing and shifting farms. (d) The AMAs as proposed do not allow for the practicalities of laying out mussel farms. That is, the lines/shapes presently drawn on maps do not account for the physical realities of mussel farm placement in the water.
57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.5	Oppose	Delete paragraph 13.21.7(g).
57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.6	Oppose	Delete Policy 13.21.7(h); OR In the alternative, adopt the technical mechanism <sup>12</sup> for enabling a site swap recommended by the Salmon Relocation Advisory Panel.
79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.10	Neutral	Retain as notified, except for changes as to improve clarity and effectiveness set out below. Reword clause (d)(ii) as follows or to like effect: "... and that additional marine farming activities can be undertaken within the CMU without creating a significant adverse effect on the natural and human use values of the CMU."
79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.40	Neutral	Variation 1A: Retain as notified, with an addition to clause (h)(iii) as follows or to like effect: "... may allocate authorisations for finfish or non-fish marine farming..."
40	Tester	Jonathon Tester	40.10	Neutral	Policies 13.21.1 and 13.21.7- Amend to make it clear that where an existing farm needs to be relocated an area for relocation must be provided which is 'equivalent'. 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 long lines; (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.
40	Tester	Jonathon Tester	40.11	Neutral	Provisions that require relocated marine farms to be of the same area including but not limited to Policies 13.21.7; 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4. – Amend the variation to remove the requirement that there be no increase to the total area occupied by structure/size of the marine farm. The provisions should permit a larger overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA).
68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.14	Neutral	Amend Policy 13.21.7 and the relevant allocation and consenting rules (including adding new rules, if necessary) to ensure there is a clear consenting pathway for marine farmers that need to apply to replace their resource consent prior to the allocation of authorisations process. Preferably these amendments would enable the realignment or relocation of the existing marine farm into the proposed new location, if applicable, in order for the proposed new spatial configuration to be realised in a timely manner. Amend title of Policy 13.21.7, Policy 13.21.7(a), and Policy 13.21.7(f) to also include reference to FAMAs. Amend Policy 13.21.7(b)(iv) to ensure allocation of authorisations for space within an AMA to an existing marine farm from a different CMU also takes into account whether additional space has been identified as available within the CMU into which the existing marine farm is proposed to move.

	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.51	Neutral	Amend Policy 13.21.7(g) as follows: (g) Authorisations for [marine farms involving finfish aquaculture] [deleted] will only be allocated for space within FAMAs. Amend Policy 13.21.7 to clarify how space at the four current finfish sites that are not proposed to be FAMAs will be allocated (including enabling iwi first right to apply for the sites should the existing finfish farms not remain), and undertake a full section 32 analysis of this proposal (including assessment of how it interacts with the relevant NES-MA regulations). Amend Policy 13.21.7(h)(iii) so that the Council must first attempt to allocate authorisations in FAMAs to other finfish farmers before being allocated to non-fish farms. Amend Policy 13.21.7 (and make consequential amendments to relevant methods and rules) to ensure appropriate management of biosecurity risks associated with relocation of existing marine farms between CMUs. Amend the explanation of Policy 13.21.7 as follows: Finfish farms can only locate in a FAMA. Space in the FAMAs will be allocated to existing finfish farms in the priority set out in the policy. This is consistent with the [report and recommendations from the Marlborough Sounds Salmon Farm Relocation Advisory Panel] [deleted] provided to the Minister of Fisheries [in 2017] [deleted]. Amend the explanation of Policy 13.21.7 to clarify that it does enable applications for new marine farms in AMAs in certain circumstances.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.52	Neutral	Amend the explanation of Policy 13.21.7 to clarify that it does enable applications for new marine farms in AMAs in certain circumstances.
Policy 13.22.1	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.22	Neutral	We thus submit that references in Policy 13.22.1 to the management of cumulative effects are incorrect and should be deleted. We submit that a further policy should be added requiring monitoring and the review of consent conditions to ensure the containment of filter feeding aquaculture to the pelagic effects standard as prescribed by paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019.
	109	Guardians of the Sounds Inc	Clare Pinder and William Foster	109.1	Oppose	Variation 1 must have yearly monitoring reports and the Council should be mandated to enforce rules that breach resource consents and degrade the environment. The Council cannot continue to be Industry led rather than scientifically based. Ensure that monitoring covers the extent to what the receiving environment can sustain without degrading the natural environment. Introduce coastal occupancy charges to enable Council to do its own monitoring of mussel farms and extend ability to enforce the rules for salmon farms.
	107	Ngāi Tahu Seafood	Thomas Hildebrand	107.10	Oppose	Delete Policy 13.22.1 and replace it with a more appropriately tailored monitoring and management policy.
	62	The Marlborough Environment Centre	Tim Newsham	62.8	Oppose	Amend Policy 13.22.1 to provide for more comprehensive and frequent monitoring. A baseline survey should be established immediately in control and farmed sentinel monitoring sites, including appropriate infaunal and epifaunal surveys and then 3 yearly monitoring implemented to provide an overview of effects in a reasonable timeframe.
	70	Nelson Marlborough Conservation Board	Kath Inwood	70.2	Oppose	Amend Policies 13.22.1 and 13.M.37, 13.M 38 to provide for more comprehensive and frequent monitoring. A baseline survey should be established immediately in control and farmed sentinel monitoring sites, including appropriate infaunal and epifaunal surveys and then 3 yearly monitoring implemented to provide an overview of effects in a reasonable timeframe.
	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.14	Neutral	Revisit the thresholds themselves at regular intervals, to respond to growing/changing knowledge.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.3	Neutral	We submit that V1 should adopt, as a Sounds wide ecological carrying capacity standard, the pelagic carrying capacity provisions as prescribed in para 2.2 of the ASC Standard. Council should incorporate into its allocation regime a discretion to prorate reductions in activity levels across all of a group of existing marine farmers in such manner as MDC deems appropriate.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.21	Oppose	We thus submit that references in Policy 13.22.1 to the management of cumulative effects are incorrect and should be deleted. We submit that a further policy should be added requiring monitoring and the review of consent conditions to ensure the containment of filter feeding aquaculture to the pelagic effects standard as prescribed by paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019.
	92	Sanford Limited	Alison Undorf-Lay	92.13	Oppose	Delete. Remove reference to ES Requires more discussion as to what is being monitored, including how other users generating bay-wide effects such as forestry will be considered.
	2	McLennan	Neil McLennan	2.2	Oppose	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	McLennan	Neil McLennan	2.10	Oppose	Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits.
2	McLennan	Neil McLennan	2.19	Oppose	Need progressive, responsible management, cumulative assessment.	

	80	Browning	Steffan Browning	80.3	Oppose	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	Rob Schuckard	83.9	Neutral	<ul style="list-style-type: none"> <li>• Include zooplankton monitoring in standard monitoring protocol.</li> <li>• Uncertainty of ecological effect of filter feeders need to be addressed to provide better understanding of effect and improve the sounds wide modelling.</li> <li>• Improve the knowledge if mussels are a source or sink for nitrogen. Such will be important for future modelling.</li> <li>• Due to uncertainty, provide annual data to establish effect of activity.</li> <li>• Change ES 4.0 as maximum for mussels to ES 3.5. (ES 4.0 is a level of high enrichment, a transitional stage between moderate effects and peak macrofauna abundance and major community change unlikely reached under mussel farms).</li> <li>• Sulfide levels are set at the average 615 <math>\mu\text{M mL}^{-1}</math> correspond with low flow measures. For High Flow farms this level should be about 500 <math>\mu\text{M mL}^{-1}</math>. For ES 3.5, levels should be at 450 <math>\mu\text{M mL}^{-1}</math> and 250 <math>\mu\text{M mL}^{-1}</math> respectively</li> </ul>
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.54	Oppose	Oppose in part - Delete provision and replace with a policy which includes: (a) The Council is to establish a technical advisory group (TAG) consisting of specialists in the fields of Mātauranga Maori, marine and terrestrial ecology, terrestrial farming, aquaculture, forestry, wild fishing, soil conservation and water quality. The membership of the TAG is to be determined by Council in consultation with interested parties; (b) The TAG is to recommend, review and periodically update an environmental monitoring programme for the Marlborough Sounds. That monitoring program is to be designed so that it integrates with other scientific programmes, and focusses on areas of greater scientific uncertainty and/or greatest ecological effect to ensure scarce scientific resources are applied in the best and most efficient way. The Council is to provide the TAG with an indicative budget; (c) The Council may accept or reject the recommendations of the TAG, but must do so formally as part of its decision-making under the Local Government Act 2002; (d) Monitoring results are to be published in the context of the publishing of wider state of the environment monitoring undertaken by Council. Publication must occur at least annually; (e) A formal review of that monitoring information is undertaken annually by the TAG; and (f) The TAG and Council will jointly commission a review of its operation and the operation of the monitoring program by an independent party after the first 3 years, then every 5 years thereafter. The policy will address the effects of all Sounds activities so may be better located in another part of Chapter 13. In terms of the commentary on Policy 13.22.1, there is very little uncertainty as to the benthic effects of marine farming using conventional longline structures. The commentary should be deleted and replaced with a more accurate statement reflecting the available science. In addition, the commentary relating to water column should be updated to reflect the most recent available science.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.12	Neutral	Retain policy, but reword heading as follows or to like effect: "Monitoring and adaptive management for unanticipated or cumulative benthic effects of marine farms using..."  Insert an addition to this policy, or a separate policy, providing for water column monitoring including inter alia: <ul style="list-style-type: none"> <li>- Creation of an independent advisory group to advise on appropriate monitoring parameters and methodology, and review of results;</li> <li>- Monitoring of appropriate water quality variables at representative control and farm sites;</li> <li>- Review of the monitoring data by the independent advisory group to: <ul style="list-style-type: none"> <li>i. determine whether there are ecologically significant adverse effects attributable to marine farming and, if so</li> <li>ii. advise on appropriate effects-based limits and adaptive management approaches that can be implemented if these limits are exceeded.</li> </ul> </li> </ul>

	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.16	Neutral	Amend Policy 13.22.1 to more directly reference the scientific work that it is informed by, and to ensure the policy is not being used to create a hard threshold if it is supposed to be based on the Best management practice guidelines. Amend the explanation of Policy 13.22.1 to better convey the level of uncertainty with respect to the benthic effects of conventional longline marine farming. Amend Policy 13.22.1 so that it is consistent with the expectations of the NES-MA 'adaptive management approach' definition.
Policy 13.22.2	24	Marlborough District Council	Louise Walker	24.12	Support	Amend the formatting of Policy 13.22.2 as follows: Policy 13.22.2 Consent holders for marine farms in the coastal marine area will be required to remove marine farm structures from the site: a) on expiry or surrender of the coastal permit, unless continued operation is allowed by s124 or 165ZH of the RMA or a new coastal permit is granted to allow marine farming to continue using the same structures; or b) if marine farming activity ceases for a period of 5 years or greater (other than for operational reasons such as periodic fallowing of a site) on the site and structures are derelict, unused or obsolete, whether or not the coastal permit has expired or been surrendered. An exception may be made to the requirement to remove all structures for anchoring structures in the following circumstances: (i) the anchoring structure is a screw anchor, and the screw anchor is cut off at sea floor level and the part of the screw anchor previously protruding from the seafloor is removed; or (ii) the anchoring structure is a block anchor, and the block anchor cannot practicably be removed or reused and the remaining block anchor will not be an impediment to navigation or safe anchoring.
	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.2	Support	Retain policy as proposed
	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.23	Neutral	This policy requires the removal of structures upon the cessation of activity. This policy should extend to a forfeiture of consent rights where activity is abandoned for 5 years or more.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.22	Neutral	This policy requires the removal of structures upon the cessation of activity. This policy should extend to a forfeiture of consent rights where activity is abandoned for 5 years or more.
	92	Sanford Limited	Alison Undorf-Lay	92.14	Oppose	Delete 13.22.2(a)(ii)
	2	McLennan	Neil McLennan	2.8	Oppose	CMUs and AMAs may need further consideration. Provide for experimental and onshore aquaculture.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.57	Neutral	Policy 13.22.2(a)(ii) Delete from the words "for a period of" to "on the site". Delete "unused or obsolete"
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.58	Neutral	Oppose in part - Delete Policy 13.22.2(b)(i), insert the word "if" before Policy 13.22.2(b)(ii), delete the words "is a block anchor and the block anchor" and replace the words "remaining block anchor" with "remaining anchoring structure".
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.13	Support	Retain as notified, apart from changes to improve clarity and effectiveness as set out in submission.
Policy 13.22.3	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.24	Support	We take the opportunity to highlight the contradiction that this Policy raises within V1. It, quite rightly, prescribes a precautionary approach for the addition of one new marine farm activity. However, at the same time V1 is facilitating the renewal of all existing activity as a controlled activity when it is in the same field and is facing the same uncertainty and potentially significant adverse effects.
	70	Nelson Marlborough Conservation Board	Kath Inwood	70.3	Support	Retain Policy 13.22.3.
	86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.4	Neutral	Replace the word 'Significant' with "more than minor".
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.23	Neutral	We take the opportunity to highlight the contradiction that this Policy raises within V1. It, quite rightly, prescribes a precautionary approach for the addition of one new marine farm activity. However, at the same time V1 is facilitating the renewal of all existing activity as a controlled activity when it is in the same field and is facing the same uncertainty and potentially significant adverse effects.
	92	Sanford Limited	Alison Undorf-Lay	92.15	Oppose	Delete Policy 13.22.3(b) and (c)
	2	McLennan	Neil McLennan	2.11	Oppose	Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits.
	2	McLennan	Neil McLennan	2.20	Oppose	Need progressive, responsible management, cumulative assessment.
	83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.10	Oppose	Delete entire policy.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.27	Neutral	Amend text to read: "To ensure that adequate separation for navigation purposes is achieved to publically accessible boat launching facilities, public jetties, publically accessible beaches, public moorings, anchorages of refuge and recognised navigation routes20 where this is necessary to maintain and enhance the public recreation and amenity values of the Marlborough Sounds."

	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.59	Oppose	Delete the policy and replace with: "For new marine farms, consider whether they should be established using an adaptive management regime"
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.60	Oppose	Policy 13.22.3(a)(iii) The question ought to be whether the potential effects cannot be adequately predicted. If the potential adverse effects of an activity are well understood the fact that it is new for the region or for that. Delete paragraph.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.61	Oppose	Policy 13.22.3(a)(v) Delete paragraph.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.62	Oppose	Delete sub-policies (b) and (c). Alternatively, some of the discussion could be inserted into the commentary to provide guidance, but which is not necessarily mandatory in any particular circumstance. Note typo in sub-policy (b)(iii): "report" not "reported".
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.14	Support	Retain as notified, apart from changes to improve clarity and effectiveness as set out in submission.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.17	Neutral	Amend Policy 13.22.3(a) to provide further clarity on the definition of a new marine farm. Amend Policy 13.22.3(b)(ii) to provide greater clarity as to whether multiple stages of development can be authorised under the same consent. Amend Policy 13.22.3 to provide clarity about its application to marine farming that does not involve conventional longline structures, including new farms in FAMAs (particularly those proposed to be relocated through the Marlborough Sounds salmon farm relocation proposal). If Policy 13.22.3 applies to new farms in FAMAs, amend Policy 13.22.3(b) to be consistent with the approach in the proposed salmon relocation regulations with respect to feed discharge staging. If Policy 13.22.3 does not apply to new farms in FAMAs, insert a policy to manage feed discharge increases at the three sites, consistent with the proposed salmon relocation regulations. Amend Policy 13.22.3 so that it is consistent with the expectations of the NES-MA 'adaptive management approach' definition.
Policy 13.22.4	24	Marlborough District Council	Louise Walker	24.16	Support	Restart provision lettering for Policy 13.22.4 at (a)
	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.3	Support	Retain policy as proposed
	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.25	Support	We support this policy.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.24	Support	We support this policy.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.63	Oppose	Policy 13.21.1(d). Delete Policy. Numbering is also incorrect. Cross reference to rule 16.7.10 in the commentary should be to rule 16.7.9.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.15	Support	Retain as notified, apart from changes to improve clarity and effectiveness as set out below. Relocate this policy to the 13.21 suite of policies.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.18	Neutral	Amend Policy 13.22.4 as follows: Policy 13.22.4 – [(a)] New and existing aquaculture activities are inappropriate in the following zones: (d) [deleted]; (i) Port zone; (ii) Marina zone; (iii) Port landing area zone; [deleted]. [(b) New and existing aquaculture activities are inappropriate unless they are located within an AMA (as provided for in the Marlborough Environment Plan or through a subsequent change or variation) or the open water CMU. Marine farms in inappropriate areas are prohibited.] Amend the explanation of Policy 13.22.4 as follows: Policy 13.21.1(e) and the planning maps define areas inappropriate for new and existing aquaculture activities and together are intended to [deleted] [identify] inappropriate area[s] for existing aquaculture activities [in accordance with] [deleted] regulation 6 of the NESMA. Amend variation provisions as necessary so that only the term "Offshore CMU" is used to refer to the Offshore CMU.
Policy 13.22.5	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.26	Neutral	We make the following submissions with regard to this policy: i) There is no need for reference CMUs in this policy. CMU's are not relevant parameters to ecological effect assessments. ii) The threshold for a response in paragraph (b) should be more than minor effects, not significant effects. iii) Assuming the ASC Standard pelagic effect standard is, as we submit, adopted as a cumulative effect tool, then there should be a clause added requiring a review toward the adoption of better models or measurement systems for water column effects if and when they become available. iv) It would be remiss to not note in the commentary that long term monitoring and data collection are unlikely, of themselves, to assist with the meaningful determination of the effects of existing farming.
	107	Ngāi Tahu Seafood	Thomas Hildebrand	107.11	Neutral	Amend Policy 13.22.5 as follows: (b) Monitoring (including monitoring undertaken in accordance with Policy 13.22.1 shows significant adverse ecosystem effects from marine farming are occurring; or...

	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.25	Neutral	We make the following submissions with regard to this policy: i) There is no need for reference CMUs in this policy. CMU's are not relevant parameters to ecological effect assessments. ii) The threshold for a response in paragraph (b) should be more than minor effects, not significant effects. iii) Assuming the ASC Standard pelagic effect standard is, as we submit, adopted as a cumulative effect tool, then there should be a clause added requiring a review toward the adoption of better models or measurement systems for water column effects if and when they become available. iv) It would be remiss to not note in the commentary that long term monitoring and data collection are unlikely, of themselves, to assist with the meaningful determination of the effects of existing farming.
	92	Sanford Limited	Alison Undorf-Lay	92.16	Oppose	Seeks deletion of both whole policy and 13.22.5(d).
	2	McLennan	Neil McLennan	2.12	Oppose	Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits.
	2	McLennan	Neil McLennan	2.21	Oppose	Need progressive, responsible management, cumulative assessment.
	2	McLennan	Neil McLennan	2.27	Neutral	Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring.
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.8	Oppose	(a). Delete sub policy (b), or amend so that it provides that "Monitoring (including monitoring undertaken in accordance with Policy 13.22.1, shows significant adverse ecosystem effects are occurring and an assessment shows that those effects have been caused by marine farms." Amend sub policy (c) as sought in the MFA/AQNZ submission to read "New information becomes available...if those effects are predicted to be significant." Delete sub policy (d).
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.64	Oppose	Delete sub-paragraphs (a) and (d). AND Amend sub-paragraph (c) to read: "New information becomes available about the effects of marine farming, which requires changes to the management of marine farms to manage those effects[, if those effects are predicted to be significant]"
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.65	Neutral	Amend sub-policy (d) to clarify that it is 5 years after the date of the last review. Delete first sentence of commentary and replace with: "Marine farming is the most well understood activity in the Marlborough marine environment."
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.16	Support	Retain as notified, apart from changes to improve clarity and effectiveness as set out below. Reword clause (a) as follows or to like effect: "If monitoring and assessment undertaken in accordance with Policy 13.22.1 conclude that the Enrichment Stage (ES) for a marine farm..." Add a Definition of "Enrichment Stage (ES)" to the Definitions in Volume 2, Chapter 25. This definition should specifically refer to the Best Management Practice Guidelines for salmon farms in the Marlborough Sounds: Benthic environmental quality standards and monitoring protocols 2019 (1 Keeley, N; Gillard, M; Broekhuizen, N; Ford, R; Schuckard R; Urlich S. 2019).
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.19	Neutral	Amend Policy 13.22.5 to provide clarity about whether it is intended to exclude marine farming that does not involve conventional longline structures. Amend Policy 13.22.5(a) to ensure an appropriate threshold for reviewing resource consents is established that does not single out marine farming unnecessarily. Amend Policy 13.22.5(b) to ensure it is clear what 'significant adverse ecosystem effects' means.
Policy 13.22.6	1	Dawson	Steve Dawson	1.1	Oppose	To strengthen Policy 13.22.6 to prohibit the discharge of nonorganic debris from marine farms
	3	Pidgeon	Marg Pidgeon	3.1	Oppose	To prohibit the discharge of non-organic debris from marine farms and make it mandatory for marine farming operations to monitor and collect debris from the shoreline.
	4	Waikawa Boating Club	Lisa Delaveau	4.1	Oppose	Recommend the Policy should read: Policy 13.22.6 – Marine farm owners/occupiers are prohibited from discharging in-organic marine farming related debris and litter from their marine farming operation. Marine farm owners/occupiers shall monitor and collect marine farming related debris and litter from the adjoining shoreline and surrounding coastal marine area and dispose of it at an appropriate facility for the duration of any coastal permit issued for a marine farm.
	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.27	Oppose	We urge the Council policy section to develop some policy and rules to outline a pathway to stop/replace the use of synthetic material with an associated time line to stop this significant adverse effect for insertion into V1 as a matter of urgency.
	109	Guardians of the Sounds Inc	Clare Pinder and William Foster	109.5	Oppose	Mussel Farms: There should be a 2 week window for licence farmers to clean up their rubbish if notified and they should conduct a monthly check of areas that rubbish from the farms is known to drift to. How hard it is to essentially empty your rubbish bin. Salmon Farms: A two week window to clean up any identified rubbish and a monthly check of know areas that rubbish drifts or is blown to. Council to on-charge costs and report on their website
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.26	Neutral	We urge the Council policy section to develop some policy and rules to outline a pathway to stop/replace the use of synthetic material with an associated time line to stop this significant adverse effect for insertion into V1 as a matter of urgency.
	94	Pearson	Mark Pearson	94.2	Oppose	the problem with plastic rubbish (both large bits and microplastics) related to the aquaculture industry needs to be much better addressed.

		2	McLennan	Neil McLennan	2.13	Oppose	Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits.
		2	McLennan	Neil McLennan	2.28	Neutral	Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.66	Neutral	Retain provision. Add sentence at end of commentary as follows: "This approach is consistent with the A+ Sustainable Management Framework and the Marine Farming Association's Environment Programme."
		79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.17	Support	Retain as notified, apart from changes to improve clarity and effectiveness as set out in submission.
		68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.20	Neutral	Amend explanation of Policy 13.22.6 to provide examples relevant to finfish farming too.
	Policy 13.22.7	78	Hughes	Ciaran Hughes	78.8	Neutral	Amend the policy to recognise that a minimum longline space of 15m is not always practical.
		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.28	Neutral	We support most of the standards imposed but make the following submissions: i) There is requirement to have a gap of at least 50m between farms to allow for public access to the foreshore. There should also be gap of at least 50m wide through a farm for every 200m of surface structure. This is because some farms are over a kilometre long and as such there is a need to ensure that there are appropriate breaks in structures within farms to facilitate public coastal access. ii) There should be more objective standards set to control amenity impacts, such as a prohibition on night vessel activity (light or noise) in at least moderately populated areas such as the Kenepuru Sound or the Beatrix Basin.
		112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.1	Support	Retain sub-policy (a)
		112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.2	Oppose	Delete sub-policy (b) in its entirety. Longline spacing is a matter that should be decided on a case by case basis.
		34	CLIFFORD BAY MARINE FARMS LTD	Quentin Alexander Muir Davies and Kerry Morgan Moor	34.6	Neutral	Amend Policy 13.22.7 to read as follows - additions are indicated by [ ]: Rule 16.6.13 Marine farming in an Offshore CMU [which is a new application for which a coastal permit has not previously been granted] including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water.  Policy 13.22.7 – The layout, positioning, design and operation of marine farms and associated structures must ensure: (a) for marine farms using conventional long line structures, the lines are generally positioned parallel to the shoreline, unless there is a reason related to the geography or bathymetry or hydrology of the location that this is not practicable; (b) for marine farms using conventional long line structures, the lines are positioned with a 15-20 metre space between each line [except for marine farms in offshore CMU's which may be 15 - 66m apart]; ...
		107	Ngāi Tahu Seafood	Thomas Hildebrand	107.12	Neutral	Amend Policy 13.22.7(b) and (c) to recognise current situations where no significant adverse effects are occurring as a result of spacing different to that specified within the policies, and to provide flexibility for line spacing so that the most effective use can be made of available marine farming space
		107	Ngāi Tahu Seafood	Thomas Hildebrand	107.13	Neutral	Amend Policy 13.22.7(g) to recognise the difficulty of determining the source of noise or odour effects
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.27	Neutral	We support most of the standards imposed but make the following submissions: i) There is requirement to have a gap of at least 50m between farms to allow for public access to the foreshore. There should also be gap of at least 50m wide through a farm for every 200m of surface structure. This is because some farms are over a kilometre long and as such there is a need to ensure that there are appropriate breaks in structures within farms to facilitate public coastal access. ii) There should be more objective standards set to control amenity impacts, such as a prohibition on night vessel activity (light or noise) in at least moderately populated areas such as the Kenepuru Sound or the Beatrix Basin.
		92	Sanford Limited	Alison Undorf-Lay	92.17	Neutral	Policy 13.22.7(b) - Replace with: "For marine farms using conventional longline structures, the lines will be generally positioned with 10m spacing between each longline." Policy 13.22.7(c) - Replace with: "Current gaps are retained where adjacent marine farms are in different ownership ...".
		2	McLennan	Neil McLennan	2.14	Oppose	Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits.
		2	McLennan	Neil McLennan	2.29	Neutral	Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.67	Neutral	Replace "must" with "shall generally".
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.68	Neutral	Amend references throughout to "long line" to "consented backbone", for consistency.	

		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.69	Support	Policy 13.22.7(a) Retain provision.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.70	Neutral	Policy 13.22.7(b) Replace sub-policy with: "For marine farms using conventional longline structures, the lines will be generally positioned with a minimum of 10m space between each longline."
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.71	Neutral	Replace sub-policy (c) with: "That a gap of 50m between seabed structures of adjacent marine farms in different ownership is generally retained, and that the existing gap between the surface structures of adjacent marine farms is generally retained to allow for public access to the foreshore (including for recreational access and access for other boating traffic)." This highlights why it is important to properly define "marine farm" (see above).
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.72	Neutral	Policy 13.22.7(d) Delete "visual amenity values" and replace with "visibility and coherent appearance"
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.73	Neutral	Policy 13.22.7(g) Amend sub-policy to read: "that noise from the operation of the marine farm does not have significant effects on coastal amenity values"
		79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.18	Neutral	Retain as notified, apart from changes to improve clarity and effectiveness as set out below. Insert an addition to this policy as follow or to like effect: "(g) that any stock, structures or other materials relocated from elsewhere do not create a biosecurity risk or allow the release or spread of harmful aquatic organisms."
		40	Tester	Jonathon Tester	40.8	Neutral	Amend the policy to recognise that a minimum longline space of 15m is not always practical.
		68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.21	Neutral	Amend Policy 13.22.7(d) and (g) so that it is consistent with equivalent provisions in the NES-MA.
	Policy 13.22.8	78	Hughes	Ciaran Hughes	78.12	Neutral	Amend the variation to remove the requirement that there be no increase to the total area occupied by structures/size of the marine farm.  The provisions should permit a large overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA).
		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.29	Neutral	Landscape values are not already, or will not become as a result of the spreading, significantly adversely effected by development. Thus paragraph (iii) as proposed by V1 should be deleted. As such, we submit that any application for more area or more intensive marine farming within an AMA must meet the criteria as outlined in our proposed new policy 13.21.3.1, with the threshold test with regard to issues identified in Issue 130 being no more than minor. Security of structures is another issue that should be accommodated – longer lines within a consented site will generally only be achievable by effecting more acutely angled anchor lines - and this increases the fragility of the structures and brings accordant risks to the public and the environment. As an aside, we take "area occupied" to be a reference to surface area, as any change to consented area itself would require a new resource consent. However, it may be worth being more specific in the provisions when referencing 'area' or 'area occupied'. In our view it is inappropriate for the commentary to this policy to state that the effects of changing the layout of structures for an established farm 'will be only minor' and these comments should be deleted. This policy goes much further than that and stands to facilitate potentially significant adverse effects, not only cumulative ecological, natural character or landscape effects, but also with site specific effects such as navigation, public access and safety, recreational use and visual amenity.
		34	CLIFFORD BAY MARINE FARMS LTD	Quentin Alexander Muir Davies and Kerry Morgan Moor	34.3	Neutral	Amend policy 13.22.8 to read as follows - additions are indicated by [ ]: Policy 13.22.8 – Change in layout (a) Enable a change to the layout of structures for an existing marine farm using conventional long-line structures within an AMA, [nearshore CMU or offshore CMU,] where there is no increase to the total area occupied by structures and no increase in the total length of lines. ...
		107	Ngāi Tahu Seafood	Thomas Hildebrand	107.14	Neutral	Amend Policy 13.22.8 so that it covers finfish farming as well



		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.28	Neutral	Paragraph (ii) is inadequate on a number of fronts. As such, a third paragraph should be added as follows: (new paragraph iii) Natural character or natural landscape values are not already, or will not become as a result of the spreading, significantly adversely effected by development. Thus paragraph (iii) as proposed by V1 should be deleted. As such, we submit that any application for more area or more intensive marine farming within an AMA must meet the criteria as outlined in our proposed new policy 13.21.3.1, with the threshold test with regard to issues identified in Issue 130 being no more than minor. Security of structures is another issue that should be accommodated – longer lines within a consented site will generally only be achievable by effecting more acutely angled anchor lines - and this increases the fragility of the structures and brings accordant risks to the public and the environment. As an aside, we take “area occupied” to be a reference to surface area, as any change to consented area itself would require a new resource consent. However, it may be worth being more specific in the provisions when referencing ‘area’ or ‘area occupied’. In our view it is inappropriate for the commentary to this policy to state that the effects of changing the layout of structures for an established farm ‘will be only minor’ and these comments should be deleted. This policy goes much further than that and stands to facilitate potentially significant adverse effects, not only cumulative ecological, natural character or landscape effects, but also with site specific effects such as navigation, public access and safety, recreational use and visual amenity.
		92	Sanford Limited	Alison Undorf-Lay	92.18	Neutral	In (a) delete the words “no greater than 10% increase to the total area occupied by structures and” and delete (b) in its entirety.
		2	McLennan	Neil McLennan	2.15	Oppose	Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits.
		2	McLennan	Neil McLennan	2.30	Neutral	Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring.
		83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.11	Neutral	• Change ‘total length of lines’ into total ‘length of culture rope’. • Delete 13.2.8 (b) iii - ...‘the positive effect’... is unsubstantiated and not defined.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.74	Neutral	Amend text as follows: a. Delete the words “no increase to the total area occupied by structures and” from sub-policy (a); b. Add the following to sub-policy (a): “...structures within an AMA, [nearshore CMU or offshore CMU] where there is no increase to the total area...”; and c. Delete (b) in its entirety.
		79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.19	Neutral	Retain as notified, apart from changes to improve clarity and effectiveness as set out in submission.
		40	Tester	Jonathon Tester	40.12	Neutral	Provisions that require relocated marine farms to be of the same area including but not limited to Policies 13.21.7; 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4. – Amend the variation to remove the requirement that there be no increase to the total area occupied by structure/size of the marine farm. The provisions should permit a larger overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA).
		68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.22	Neutral	Amend Policy 13.22.8 so that it also provides for changes in layout for marine farming that does not involve conventional longline structures and for new marine farms consented after the variations were notified.
	Policy 13.22.9	24	Marlborough District Council	Louise Walker	24.2	Support	Add a new clause to 13.22.9 as follows: (g) The species to be added have the potential to escape and cause a detrimental genetic effect on wild populations.
	Policy 13.22.9	24	Marlborough District Council	Louise Walker	24.14	Support	Amend 13.22.9 (b) to read: is one of the species listed in Appendix 11;
	Policy 13.22.9	32	The NZ Rock Lobster Industry Council (NZRLIC) and The Pāua Industry Council (PIC).	Mark Edwards	32.4	Oppose	Policy 13.22.9 should be amended to read – Enable the change or addition of species able to be farmed in a marine farm, where the species to be added (a) is not a finfish species, and (b) is one of the a bivalve or plant species listed in Appendix 11...
	Policy 13.22.9	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.30	Neutral	We submit that there needs to be a further standard added to this enabling policy to the effect that the new species must have the same or lesser demand on primary production (i.e. base community structure such as phytoplankton or zooplankton) than the currently consented species, and must also have the same or lesser depositional impact on the benthic environment.
	Policy 13.22.9	107	Ngāi Tahu Seafood	Thomas Hildebrand	107.15	Oppose	Delete Policy 13.22.9 (a) and (d) as finfish and discharge of feed should be considered based on proper evaluation of effects at the proposed marine farm and AMA.
	Policy 13.22.9	107	Ngāi Tahu Seafood	Thomas Hildebrand	107.16	Oppose	Delete Policy 13.22.9(f)
	Policy 13.22.9	89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.9	Neutral	Amend policy 13.22.9(c) -amend seaweed to address only indigenous varieties that are already naturally occurring within the surrounding area. Ensure that the existing seagrass in the surrounding area is not adversely affected. Evaluation must be precautionary and must include an independent peer review. Such to be at the cost of the applicant.

	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.29	Neutral	We submit that there needs to be a further standard added to this enabling policy to the effect that the new species must have the same or lesser demand on primary production (i.e. base community structure such as phytoplankton or zooplankton) than the currently consented species, and must also have the same or lesser depositional impact on the benthic environment.
	92	Sanford Limited	Alison Undorf-Lay	92.19	Oppose	Delete 13.22.9(f).
	2	McLennan	Neil McLennan	2.16	Oppose	Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits.
	2	McLennan	Neil McLennan	2.31	Neutral	Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring.
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.9	Neutral	Amend policy 13.22.9(a) so it reads: Enable the change or addition of species to be farmed in a marine farm, provided that the species to be is a bi-valve, mollusc, sponge, or algae and is not: (a) a finfish species; and (b) there is no discharge of feed or medicinal or therapeutic compounds associated with the species.... (ie remove reference to Appendix 11). Support and adopt MFA/AQNZ relief sought in respect of Policy 13.22.9(e) and (f) and the Commentary on the Policy as follows: Amend the Policy so that it is consistent with NESMA by deleting the words "if the species to be added is" through to the end of the Policy. To the extent that activities provided in NESMA are not captured by the associated policies and rules, add new policies and rules consistent with NESMA. Delete 13.22.9(f). From the policy commentary - Remove reference to "discharge of contaminants". AND Replace "bivalve species" with "bivalve, or mollusc, or sponge, or algae species". AND Amend as a result of NESMA where appropriate.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.75	Neutral	Amend the Policy so that it is consistent with NESMA by deleting the words "if the species to be added is" through to the end of the Policy. To the extent that activities provided in NESMA are not captured by the associated policies and rules, add new policies and rules consistent with NESMA
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.76	Oppose	Delete 13.22.9(f).
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.77	Neutral	Remove reference to "discharge of contaminants". AND Replace "bivalve species" with "bivalve, or mollusc, or sponge, or algae species". AND Amend as a result of NESMA where appropriate.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.20	Neutral	Retain as notified, apart from changes to improve clarity and effectiveness as set out below. Reword clause (b) as follows or to like effect: "is one of the species listed in Appendix 11 (except for introduction of Pacific oysters into a CMU where they are not already established); and" Reword clause (c) as follows or to like effect: "A, mollusc, sponge or algae; and" Reword clause (f) as follows or to like effect: "The marine farm is currently authorised solely..."
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.23	Neutral	Amend Policy 13.22.9 (and make consequential amendments to relevant rules) so that it better enables a more diverse range of species to be farmed in order to enable innovation and better reflect the change of species provisions of the NES-MA.
Policy 13.22.10	109	Guardians of the Sounds Inc	Clare Pinder and William Foster	109.2	Oppose	Council should be mandated to take meaningful action on the rules they say are in place. Introduce costal occupancy charges to enable Council to do its own monitoring of mussel farms and extend ability to enforce the rules for salmon farms.
	109	Guardians of the Sounds Inc	Clare Pinder and William Foster	109.6	Oppose	The continuation of salmon farming in the Sounds is inconsistent with the NZCP precautionary principle policy 8. Take into account the cumulative effects of all users of the sounds both natural and man- made as under NZCP statement.
	110	Kenepuru and Central Sounds Residents' Association	Andrew Caddie	110.7	Oppose	In short this Policy is we submit full of intentions but no substance and as such is basically flawed. However, some "substance" can be readily achieved by referring to the Best Management Practice guidelines for the benthic and water column as the guiding documents. Sub clauses (a)(i) to (a)(vi) should be replaced by a reference to the Best Management Practice guidelines for salmon farms in the Marlborough Sounds.
	110	Kenepuru and Central Sounds Residents' Association	Andrew Caddie	110.8	Oppose	The Enrichment Stage scale of 1 to 7 is a construct, created by combining 3 groups of Environmental Quality Standards parameters, where a weighted average is taken, which results in a single number between 1 and 7 on this Enrichment Stage scale. It is a handy shorthand, but is too broad brush we submit to use on its own, without the additional test of checking if specific EQS parameter values are consistent with the calculated ES number. It is a way of making sure that the calculated ES number is consistent with the observed or measured level of benthic degradation.
	70	Nelson Marlborough Conservation Board	Kath Inwood	70.4	Support	Retain policy
	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.21	Oppose	Variation 1A For there to be a following /recovery year, applied to offset impacts.

	88	New Zealand Sports Fishing Council	Helen Pastor	88.4	Oppose	To not allow resource consents to farms under 13.22.10, where the expectation under this policy is that marine farms will report and manage seabed and water column effects.  Farms applying for consent should not be given consent until research of accumulative effects is carried out preliminary.  Where the farms do not meet sustainable environmental standards, and cannot prove they would have no adverse affects on the natural environment, consent should not be given.  For Marlborough District Council to pay for this research as it directly affects the natural, social, and cultural environment, and potential tourism opportunities.
	2	McLennan	Neil McLennan	2.17	Oppose	Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits.
	2	McLennan	Neil McLennan	2.26	Oppose	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	McLennan	Neil McLennan	2.32	Neutral	Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring.
	83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.14	Neutral	Variation 1A: Policy 13.22.10 – Managing adverse effects of finfish farms. Replace text for managing FAMA sites with existing operational footprint allowance and BMP for FAMA sites (excluding relocation sites) as standard or new conditions when existing conditions expire.
	57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.7	Oppose	Delete the Policy and replace it with a policy (which might be located in elsewhere in Plan, Volume 1, Chapter 13, so that it applies more broadly), which: (a) Creates a Technical Advisory Group to support Sounds-wide monitoring; and (b) As part of this, some of the indicators identified by that Technical Advisory Group might assist in identifying any far field effects of marine farming; and (c) Any impacts that may be farm related and outside those which are expected should be investigated and, consequently, the appropriate steps should be taken either by reviewing consent conditions, establishing an adaptive management programme or in some other way addressing the issues which have been identified. The Policy should explicitly signal that we are moving away from monitoring localised effects of aquaculture. The local effects for aquaculture are well understood. Aquaculture should be the subject of an auditing regime, rather than an annual monitoring programme.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.41	Support	Variation 1A: Reword the heading of this policy as follows or to like effect: "Policy 13.22.10 – Managing adverse effects of finfish farms and discharge of feed at all marine farms..." Add a Definition of "Enrichment Stage (ES)" to the Definitions in Volume 2, Chapter 25. This definition should specifically refer to the Best Management Practice Guidelines for salmon farms in the Marlborough Sounds: Benthic environmental quality standards and monitoring protocols 2019 (1 Keeley, N; Gillard, M; Broekhuizen, N; Ford, R; Schuckard R; Ulrich S. 2019).
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.24	Neutral	Amend Policy 13.22.10 by adding a new clause that outlines how areas where maximum enrichments stages of 5 and 3 are the thresholds will be defined. Amend Policy 13.22.10 (and make necessary amendments to Policy 13.22.3) to make clear which provisions apply to all marine farms and which apply only to finfish farms. Amend Policy 13.22.10(a)(v) as follows: (v) Conditions that require the management of the marine farm to be changed when thresholds are [deleted] [exceeded], in order to reduce adverse effects.... Amend Policy 13.22.10 so that it is consistent with the expectations of the NES-MA 'adaptive management approach' definition.
Policy 13.22.11	110	Kenepuru and Central Sounds Residents' Association	Andrew Caddie	110.9	Oppose	After a careful read of Policy 13.22.1, it appears from the description that Policy 13.22.1 is only meant to apply for marine farms using longlines. Hopefully Council will sort its thinking out here. Accordingly we reserve our position to comment further once the drafting is confirmed.
	70	Nelson Marlborough Conservation Board	Kath Inwood	70.5	Support	Retain policy
	2	McLennan	Neil McLennan	2.18	Oppose	Assess pre-2020 and post-2020 cumulative effects, support additional monitoring, e.g arm productivity, bacterial loads. Consider monitoring and scientific limits.
	2	McLennan	Neil McLennan	2.33	Neutral	Advocates for greater local community involvement in aquaculture management, a review of MDC environmental standards and monitoring.
	57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.8	Oppose	Delete Policy.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.42	Support	Variation 1A: Retain as notified.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.25	Neutral	Amend Policy 13.22.11 to ensure it is clear which marine farms it applies to.
13.AER.18	7	green	phil green	7.1	Support	To include a provision in the variations in variation 1 section 32 5.2.7 best practice, 6.2.71, policy 8.2.1 environmental effects, obj 15.1 aquaculture pol 13.2.2 that states to the effect: "that all mussel spat brought into the marlborough sounds from outside areas are certified free of any algae cyst's"

		107	Ngāi Tahu Seafood	Thomas Hildebrand	107.18	Neutral	Amend monitoring for 13.AER.18 to provide more detail on Council's actions or approaches in response to public complaints about the effects of marine farming.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.82	Support	Retain text.
	13.AER.19	89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.12	Neutral	Include the SAG members the same as a separate interested party.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.83	Support	Retain text.
	13.AER.20	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.33	Neutral	We submit that the anticipated environmental results table should reflect an AER and/or Monitoring Effectiveness should encompass not exceeding the standards for benthic or pelagic effects as specified in the Aquaculture Stewardship Council ASC Bivalve Standard Version 1.1
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.32	Neutral	We submit that the anticipated environmental results table should reflect an AER and/or Monitoring Effectiveness should encompass not exceeding the standards for benthic or pelagic effects as specified in the Aquaculture Stewardship Council ASC Bivalve Standard Version 1.1
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.84	Support	Retain text.
	13.M.35	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.11	Neutral	Amend wording to clarify that renewal consents for existing marine farms in an Offshore CMU are a controlled activity; or drawing an AMA around those existing marine farms in Offshore CMUs and providing for renewal consents within the AMAs as a controlled activity.
		68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.26	Neutral	Amend Method 13.M.35 as follows: Regional rules apply to the occupation of space in the coastal marine area for marine farming, and the erection and use of structures[, and any discharges] associated with marine farming. No marine farming activities are able to be permitted activities. Marine farming that is not in an AMA[, ASA, FAMA,] or in the offshore CMU is a prohibited activity.
	13.M.36	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.78	Neutral	Correct typo. Should be "circumstances", plural.
	13.M.37	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.31	Neutral	A more pragmatic and appropriate Method would be that as recommended in the NB Report as "larger scale field manipulations" <sup>43</sup> . The issues identified by the NB Report with farmer resistance with this method would not exist if, as we have submitted, an at risk area(s) is/are necessarily farmed down to an acceptable level under the pelagic effects ASC Standard. This will afford an ideal opportunity to undertake the recommended field work and to empirically measure the degree of community change that occurs with the changing intensity of cultured bi-valve activity.
		107	Ngāi Tahu Seafood	Thomas Hildebrand	107.17	Neutral	Amend Method 13.M.37 consequential to amendments made to Policy 13.22.1. Amend the explanation of Method 13.M.37 to remove reference to measuring the cumulative adverse effects of marine farms
		62	The Marlborough Environment Centre	Tim Newsham	62.9	Oppose	Amend Method 13.M.37 to provide for more comprehensive and frequent monitoring. A baseline survey should be established immediately in control and farmed sentinel monitoring sites, including appropriate infaunal and epifaunal surveys and then 3 yearly monitoring implemented to provide an overview of effects in a reasonable timeframe.
		70	Nelson Marlborough Conservation Board	Kath Inwood	70.16	Oppose	Amend Policies 13.22.1 and 13.M.37, 13.M 38 to provide for more comprehensive and frequent monitoring. A baseline survey should be established immediately in control and farmed sentinel monitoring sites, including appropriate infaunal and epifaunal surveys and then 3 yearly monitoring implemented to provide an overview of effects in a reasonable timeframe.
		89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.10	Neutral	For Council to continue to monitor and enhance same allocating a minimum of 75% of the Coastal occupation charges received from the industry to enable such. Reporting to the public every 3 years would be more appropriate given the climate change and seawater change that is going to occur.
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.30	Neutral	A more pragmatic and appropriate Method would be that as recommended in the NB Report as "larger scale field manipulations" <sup>43</sup> . The issues identified by the NB Report with farmer resistance with this method would not exist if, as we have submitted, an at risk area(s) is/are necessarily farmed down to an acceptable level under the pelagic effects ASC Standard. This will afford an ideal opportunity to undertake the recommended field work and to empirically measure the degree of community change that occurs with the changing intensity of cultured bi-valve activity.
		92	Sanford Limited	Alison Undorf-Lay	92.20	Neutral	Need to alter the text to enable changes sought to Policy 13.22.1. Replace "understand water column effects" with "better understand water column effects".

	80	Browning	Steffan Browning	80.4	Oppose	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.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.79	Neutral	Need to alter text in light of changes sought to Policy 13.22.1. Replace "understand water column effects" with "better understand water column effects".
13.M.38	62	The Marlborough Environment Centre	Tim Newsham	62.10	Oppose	Amend Method 13.M.38 to provide for more comprehensive and frequent monitoring. A baseline survey should be established immediately in control and farmed sentinel monitoring sites, including appropriate infaunal and epifaunal surveys and then 3 yearly monitoring implemented to provide an overview of effects in a reasonable timeframe.
	70	Nelson Marlborough Conservation Board	Kath Inwood	70.17	Oppose	Amend Policies 13.22.1 and 13.M.37, 13.M 38 to provide for more comprehensive and frequent monitoring. A baseline survey should be established immediately in control and farmed sentinel monitoring sites, including appropriate infauna! and epifaunal surveys and then 3 yearly monitoring implemented to provide an overview of effects in a reasonable timeframe.
13.M.39	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.32	Neutral	As we have indicated in our submission on 13.21.7, we submit that Council needs to allocate the first round of consent rights by discretion and adopt more of a take it or leave it approach to the allocation decisions it makes.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.31	Neutral	As we have indicated in our submission on 13.21.7, we submit that Council needs to allocate the first round of consent rights by discretion and adopt more of a take it or leave it approach to the allocation decisions it makes.
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.12	Neutral	MFA/AQNZ Decision Sought Wakatū/Kono adopts the MFA/AQNZ Decision Sought that there may need to be consequential changes to this text if an alternative to authorisations is used. Wakatū/Kono Additional Decision Sought Implementation Plan should be included in Plan provisions or attached as a Schedule to the Plan; must not be left to be developed subsequently or separately as policy provisions are too significant.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.80	Neutral	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.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.21	Neutral	Reword as follows or to like effect: "...The Council will prepare the implementation guide in consultation with iwi, DOC, MPI, and industry and community stakeholders
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.50	Neutral	Amend Method 13.M.39 so that central government agencies are also consulted with during the preparation of the implementation guide.
13.M.40	89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.11	Neutral	Include the SAG members the same as a separate interested party.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.81	Support	Retain method.
New provision	10	Nelson City Council	Sue Robb, Senior Planning Officer	10.1	Support	The inclusion of an explicit integration method specifically addressing future aquaculture growth and changes in technology. This would include for example sharing of monitoring data, advice on consent conditions and past experiences, methodologies relating to adaptive management, etc. To achieve this we propose the following wording: Methods of Implementation: 13.M.36A Integrated management - The Council will work collaboratively with Nelson City Council to ensure that future aquaculture growth is managed effectively between the two regions. This would include, but not be limited to sharing monitoring data, sharing advice on consent matters, discussing methodologies relating to adaptive management and monitoring.
	81	Allan Roy Tester, Ronald Dennis Bothwell and Rosemary Joy Bothwell	Jonathon Tester	81.4	Neutral	Provide flexibility within the variation to adjust the shape of an AMA on the basis of site specific benthic surveys, as part of the consenting process for older farms.
	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.15	Neutral	We submit that a policy along the following lines should be added after Policy 13.21.3: Policy 13.21.3.1 - The size or area of any AMA or AMAs shall be determined with regard to the following criteria: a) The containment of filter feeding aquaculture to within the pelagic effects standard as prescribed by paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019. b) The avoidance of significant adverse effects on natural character values or natural landscape values. c) The avoidance of any other significant adverse effects on indigenous ecosystems and habitats. d) The Issues outlined in Issue 13O.
	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.47	Support	Consequential Changes to Other PMEP Provisions Policy 13.2.3 – We agree that marine farm lapse periods should be 3 years.

		105	Orman	Bridget and Tony Orman	105.3	Support	The aquaculture which continues to occupy the public's space for private profit, pay no rates. It is logical that they pay rates and at amounts which covers environmental policing and compliance	
		89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.25	Oppose	Add provision for the Coastal Occupancy Charges. [Inferred]	
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.14	Support	we submit that a policy along the following lines should be added after Policy 13.21.3: Policy 13.21.3.1 - The size or area of any AMA or AMAs shall be determined with regard to the following criteria: a) The containment of filter feeding aquaculture to within the pelagic effects standard as prescribed by paragraph 2.2 of the Aquaculture Stewardship Council ASC Bivalve Standard version 1.1 March 2019. b) The avoidance of significant adverse effects on natural character values or natural landscape values. c) The avoidance of any other significant adverse effects on indigeneous ecosystems and habitats. d) The Issues outlined in Issue 13O.	
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.46	Support	Consequential Changes to Other PMEP Provisions Policy 13.2.3 – We agree that marine farm lapse periods should be 3 years.	
		92	Sanford Limited	Alison Undorf-Lay	92.21	Support	Add a policy that allows the applicant to assess whether the move is efficient and effective.	
		92	Sanford Limited	Alison Undorf-Lay	92.39	Support	Add a new policy to the Plan for calculating the area within the licence that can be farmed. Amend the Council's smart maps by including an additional layer that records useable space on the licence	
		27	Ayakulik Limited	Peter Radich	27.1	Oppose	To add a new Policy (perhaps between Proposed Policy 13.21.6 & 13.21.7) as follows: 'To enable the extension of Existing Marine Farms, by providing for such extensions through the resource consent process, as a discretionary activity.' (so that such extensions are able to be applied for by resource consent as a discretionary activity).	
		49	PHR Processing Limited	Quentin Davies and Kerry Moor	49.4	Oppose	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.	
		57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.11	Support	If Variation 1A is to be retained, insert a new policy which addresses biosecurity. New finfish farming enterprises, particularly in the Open Ocean environment, need to be in the order of 25km apart. 17 NZ King Salmon produces a genetically distinct forms of King Salmon, such as Tye. The biosecurity regime which is imposed should ensure that such products are able to be produced in a bio-secure way.	
		57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.12	Support	The Plan should include a policy that includes provision for new finfish farming in appropriate locations, especially in the open ocean.	
		57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.13	Support	The MEP should recognise the value of ecosystem services provided by finfish farms.	
		57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.14	Support	Insert 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.	
	Chapter: 4	Objective 4.1	8	Simpson	Christine Simpson	8.1	Support	Variations 1 & 1A Support all provisions
			67	Martin	Peter Martin	67.1	Oppose	The variations go too far in the direction of allowing for aquaculture (including finfish). Consents should go through a public notification process. More should be done to monitor cumulative effects.  [Inferred]
			79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.35	Support	Retain as notified.
Volume Two	Chapter: 16	16.4	8	Simpson	Christine Simpson	8.2	Support	Variations 1 & 1A Support all provisions

91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.34	Oppose	We submit that there are no grounds made for the adoption of controlled activity status for any Sounds aquaculture activity and neither are there any grounds made for the non-notification of consent applications for aquaculture activities within the Sounds. We submit that a rapidly changing environment and public demands and values means that consenting for aquaculture within AMAs in the Sounds should be, at the least, limited discretionary. Moreover, all consent applications for aquaculture in the Sounds should be notified unless it is dictated by the NES that they should not be notified. We submit that there must, at the least, be an explicit policy adopted of either restricting consent terms or restricting the issue of future authorisations where the term of a prospective consent is likely to transgress a future plan review.
112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.16	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
51	Anstis	Scott Anstis	51.2	Support	For existing marine farms be 'renewed' as a controlled activity without notification
84	J & A SEGGIE FAMILY TRUST	Bruce Cardwell	84.6	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
73	WILLANS	IAN WILLANS	73.2	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
50	ROBERT AND SIMON POOLEY	Bruce Cardwell	50.7	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
46	PB PARTNERSHIP (WAINUI GREEN LIMITED & TWO MF LIMITED)	Bruce Cardwell	46.2	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
45	MICHAEL AND ANNA RICHARDS	Bruce Cardwell	45.3	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
44	LINDSAY AND JANE STUART	Bruce Cardwell	44.2	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
38	GARY BROWN AND NANETTE BUCHANAN-BROWN	Bruce Cardwell	38.4	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
37	BURNS	FRANK BURNS	37.4	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
36	JONES	DAVID JONES	36.2	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
34	CLIFFORD BAY MARINE FARMS LTD	Quentin Alexander Muir Davies and Kerry Morgan Moor	34.9	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
35	DAVID MUIR MCLAREN & LENORE MARY MCLAREN	Bruce Cardwell	35.7	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
31	Womersley	Chris Womersley	31.3	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
30	CANANTOR MUSSELS LIMITED	Q A M Davies, A L Hills and E L Deason	30.2	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
29	Skeggs	Bryan Skeggs	29.2	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
28	BERYL ARCHER & JOHN HEBBERD	Bruce Cardwell	28.2	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
26	AJ KING FAMILY TRUST & SA KING FAMILY TRUST	Bruce Cardwell	26.10	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
25	Hogg	David Hogg	25.4	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
16	Sea Investments Limited	Jim Goulding & Julian Goulding	16.3	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
14	James Maurice Goulding	Jim Goulding & Julian Goulding	14.2	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
15	Shellfish Marine Farms Limited	Jim Goulding & Julian Goulding	15.4	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
17	Marlborough Oysters Ltd	Aaron Pannell	17.1	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.32	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
113	Talley's Group Limited	R D Sutherland	113.50	Support	Existing marine farms should be 'renewed' as a controlled activity without notification.
103	McCarthy	S.G.T McCarthy	103.3	Support	At a high level, S.G.T McCarthy submits that existing marine farms should be 'renewed' as a controlled activity without notification
104	Elkington and McCarthy	T.R. Elkington and S.G.T. McCarthy Elkington and McCarthy	104.3	Support	At a high level, T.R. Elkington and S.G.T. McCarthy submit that: Existing marine farms should be 'renewed' as a controlled activity without notification;
111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.9	Oppose	Flexibility of provisions and consequent action is required to responsibly deal with each of these circumstances.
88	New Zealand Sports Fishing Council	Helen Pastor	88.6	Oppose	Any renewal should be treated as a new consent with rigorous environmental standards to be applied.
89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.18	Oppose	Before any new farm or transferred can be established then the applicant should at their cost provide a full benthic report out to twice the area it is to occupy. With the entire area being re-examined every 5 years,

		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.33	Neutral	We submit that there are no grounds made for the adoption of controlled activity status for any Sounds aquaculture activity and neither are there any grounds made for the non-notification of consent applications for aquaculture activities within the Sounds. We submit that a rapidly changing environment and public demands and values means that consenting for aquaculture within AMAs in the Sounds should be, at the least, limited discretionary. Moreover, all consent applications for aquaculture in the Sounds should be notified unless it is dictated by the NES that they should not be notified. We submit that there must, at the least, be an explicit policy adopted of either restricting consent terms or restricting the issue of future authorisations where the term of a prospective consent is likely to transgress a future plan review.
		97	Kapua Marine Farms Limited	R D Sutherland	97.4	Support	Existing marine farms should be 'renewed' as a controlled activity without notification;
		98	Kuku Holdings Limited	R D Sutherland	98.5	Neutral	Existing marine farms should be 'renewed' as a controlled activity without notification
		99	Ngati Rarua Atiawa Trust Board	R D Sutherland	99.3	Neutral	Existing marine farms should be 'renewed' as a controlled activity without notification.
		96	Beleve Limited, R J Davidson Family Trust, and Treble Tree Holdings Limited	R D Sutherland	96.6	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
		100	Goulding Trustees Limited	Jim Goulding & Julian Goulding	100.9	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
		87	Red Sky Trust	Kevin Oldham	87.3	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
		59	Port Underwood Association	Ken Roush	59.7	Oppose	The Association does not support a Controlled Consent status and considers that the Restricted Discretionary is the more appropriate activity status for existing farms.
		47	Okiwi Bay Aquaculture Ltd	Margaret Hippolite	47.2	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
		41	Bonnington	Kevin Bonnington	41.3	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.145	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
		48	PH Redwood & Company Limited	Quentin Davies and Kerry Moor	48.3	Neutral	Existing marine farms should be 'renewed' as a controlled activity without notification
		75	Clearwater Mussels Limited	R D Sutherland	75.31	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.29	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
		71	Reader	Arthur John Reader	71.2	Support	Arthur John Reader supports the submission of MARINE FARMING ASSOCIATION and AQUACULTURE NEW ZEALAND in its totality and adopts it as his submission
		56	Worlds End Enterprises Limited	Brian & Nanette Bunting	56.3	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
		54	Wairangi Bay Marine Farms Ltd	Margaret Hippolite	54.2	Support	Existing marine farms should be 'renewed' as a controlled activity without notification
	16.4.3	78	Hughes	Ciaran Hughes	78.16	Neutral	Retain a controlled activity rule for re-consenting of marine farms (without notification).
		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.35	Neutral	We submit that such applications should be, at the least, limited discretionary with notification as it will inevitably be a complete relocation or a significant relocation. We also submit that there is no provision to control structures to effect public access to the coast – this necessary to ensure that there are 50m wide access lanes through the farm to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times.
		86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.5	Neutral	Add new rule provisions Rules 16.4.3.16; 16.4.5.17; 16.5.3.14; and 16.5.4.17 "Effects on cultural values"
		89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.13	Oppose	Resource consent applications under this rule to be considered without public notification and without limited notification. Limited notification could be considered providing it includes the SAG members could be an acceptable compromise the same consideration applies to 16.4.4 and 16.4.5  (Inferred)
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.34	Neutral	We submit that such applications should be, at the least, limited discretionary with notification as it will inevitably be a complete relocation or a significant relocation. We also submit that there is no provision to control structures to effect public access to the coast – this necessary to ensure that there are 50m wide access lanes through the farm to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times.
		2	McLennan	Neil McLennan	2.23	Oppose	Re-consenting farms in AMAs should be a discretionary activity.



	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.13	Neutral	Adopt MFA/AQNZ Decision Sought that authorisations be replaced with a map showing: (a) Farmable space within Marlborough; (b) Where farmers may place lines, and which consent holder may make a consent application to transfer that space (up to that maximum consented number of lines) in accordance with this Rule; and Update Rule 16.4.3 and associated standards accordingly. Alternative Wakatū/Kono Decision Sought - Rule 16.4.3 should be amended so that existing marine farms that are not moving into any new space, should be able to apply for a 'renewal' consent as a controlled activity without having to obtain an authorisation/go through the part 7A process. Seek to amend wording so that it says: "Marine farming using conventional longline structures or intertidal structures in an AMA, other than an ASA, which is for a replacement consent and the AMA for the marine farm is in the same location as the current marine farm; or for which an authorisation is held to apply for a coastal permit to occupy space within the AMA....."
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.85	Oppose	Support the principle but oppose the implementation. Replace authorisations with a map showing: (a) Farmable space within Marlborough; (b) Where farmers may place lines, and which consent holder may make a consent application to transfer that space (up to that maximum consented number of lines) in accordance with this Rule; and Update Rule 16.4.3 and associated standards accordingly.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.22	Neutral	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"
	40	Tester	Jonathon Tester	40.16	Neutral	Retain a controlled activity rule for re consenting of marine farms (without notification).
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.27	Neutral	Amend rule to include additional matter of control with respect to biosecurity risks. Amend standard and term 16.4.3.1 so that it is split into three parts to make it more understandable.
16.4.3.1	92	Sanford Limited	Alison Undorf-Lay	92.22	Neutral	Replace "6 months" with "24 months".
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.14	Neutral	Insert a new Standard 16.4.3.1 which provides that: "The consent applicant holds an existing consent for an existing marine farm in the same location as the AMA in respect of which the coastal permit application is made; or "The consent applicant holds an authorisation to apply for a coastal permit to occupy space within the AMA..." (And any necessary further changes to the rule and explanation to give effect to these changes). Adopt the Decision Sought by MFA/AQNZ that "6 months" be replaced with "24 months".
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.86	Neutral	Replace "6 months" with "24 months".
16.4.3.2	92	Sanford Limited	Alison Undorf-Lay	92.23	Oppose	Delete the Standard or amend so the calculation is done per company, not per licence, and information held by the Council.
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.15	Neutral	Adopt Decisions Sought by MFA/AQNZ: If the alternative approach that the MFA/AQNZ is proposing is taken, this exercise will be undertaken at the mapping stage (ie. planning stage) and need not be assessed at the controlled activity consenting stage. therefore, delete as appropriate, but retain reference to "total backbone length", and add to that "measured in metres".
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.87	Oppose	Delete as appropriate, but retain reference to "total backbone length", and add to that "measured in metres".
16.4.3.3	78	Hughes	Ciaran Hughes	78.13	Neutral	Provisions that require relocated marine farms to maintain the same area including but not limited to Policies 13.21.7, 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4 - Amend the variation to remove the requirement that there be no increase to the total area occupied by structures/size of the marine farm. The provisions should permit a large overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA).
	92	Sanford Limited	Alison Undorf-Lay	92.24	Oppose	Delete the Standard.
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.16	Neutral	Adopt Decisions Sought by MFA/AQNZ to delete Standard 16.4.3.3.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.88	Oppose	Delete the Standard.
	40	Tester	Jonathon Tester	40.13	Neutral	Provisions that require relocated marine farms to be of the same area including but not limited to Policies 13.21.7; 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4. – Amend the variation to remove the requirement that there be no increase to the total area occupied by structure/size of the marine farm. The provisions should permit a larger overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA).
16.4.3.4	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.17	Neutral	Adopt Decisions Sought by MFA/AQNZ in respect of remaining standards and terms.

16.4.3.5	24	Marlborough District Council	Louise Walker	24.13	Support	Amend Matters over which the Council has reserved control 16.4.3.5 to read (new text between **): Layout and design of the farm, including the number and length of backbone lines and droppers, and the arrangement of those lines including separation distances between lines *and between farms*.
	92	Sanford Limited	Alison Undorf-Lay	92.25	Neutral	Delete 16.4.3.5 and 16.4.3.7 and delete the words "layout, positioning (including density)" from 16.4.3.6.
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.18	Neutral	Adopt Decisions Sought by MFA/AQNZ to delete the policy.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.89	Oppose	Delete 16.4.3.5 and 16.4.3.7 and delete the words "layout, positioning (including density)" from 16.4.3.6.
16.4.3.6	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.4	Support	Retain matter over which the Council has reserved control as proposed
	92	Sanford Limited	Alison Undorf-Lay	92.26	Neutral	Delete the words "layout, positioning (including density)"
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.19	Neutral	Adopt Decisions Sought by MFA/AQNZ to delete the words "layout, positioning (including density)" from 16.4.3.6.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.90	Oppose	Delete 16.4.3.5 and 16.4.3.7 and delete the words "layout, positioning (including density)" from 16.4.3.6.
16.4.3.7	92	Sanford Limited	Alison Undorf-Lay	92.27	Neutral	Delete matter of control 16.4.3.7
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.20	Neutral	Adopt Decisions Sought by MFA/AQNZ to delete 16.4.3.7.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.91	Oppose	Delete 16.4.3.5 and 16.4.3.7 and delete the words "layout, positioning (including density)" from 16.4.3.6.
16.4.3.8	92	Sanford Limited	Alison Undorf-Lay	92.28	Neutral	Replace "equivalent area" with "equivalent backbone length".
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.21	Neutral	Adopt Decision Sought by MFA/AQNZ to replace "equivalent area" with "the same (or less) backbone length".
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.92	Neutral	Replace "equivalent area" with "the same (or less) backbone length".
16.4.3.9	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.6	Support	Retain matter over which the Council has reserved control as proposed
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.22	Neutral	Adopt Decisions Sought by MFA/AQNZ - MFA DO NOT HAVE A SUBMISSION ON THIS POINT
16.4.3.10	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.23	Neutral	Adopt Decisions Sought by MFA/AQNZ in respect of remaining standards and terms.
16.4.3.11	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.24	Neutral	Adopt Decisions Sought by MFA/AQNZ to delete and replace with: "with respect to colour, the visibility and coherent appearance of marine farm structures".
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.93	Oppose	Delete and replace with: "with respect to colour, the visibility and coherent appearance of marine farm structures".
16.4.3.12	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.25	Neutral	Adopt Decisions Sought by MFA/AQNZ - MFA DO NOT HAVE A SUBMISSION ON THIS POINT
16.4.3.13	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.26	Neutral	Adopt Decisions Sought by MFA/AQNZ - MFA DO NOT HAVE A SUBMISSION ON THIS POINT
16.4.3.14	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.27	Neutral	Adopt Decisions Sought by MFA/AQNZ to: Replace "trigger levels in" with "trigger levels determined in accordance with".
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.94	Neutral	Replace "trigger levels in" with "trigger levels determined in accordance with".
16.4.3.15	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.28	Neutral	Adopt Decisions Sought by MFA/AQNZ in respect of remaining standards and terms.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.95	Support	Retain text.
16.4.4	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.36	Neutral	Rule 16.4.4 applies to replacement consents for the same area in an ASA. The activity status should be limited discretionary. We also submit that there should be provision to control structures to effect public access to the coast – this necessary to ensure that there is 50m wide access lanes to the shore if lines in a farm exceed 200m in length. There should also be controls over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times.
	89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.23	Oppose	Resource consent applications under this rule will be considered without public notification and without limited notification. Unacceptable the CMA belongs to the people and furthermore since predicted sea level rise and other climate change issues will arise during the life of this plan. Limited notification providing it includes the SAG members could be an acceptable compromise the same consideration applies to 16.4.4 and 16.4.5

	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.35	Neutral	Rule 16.4.4 applies to replacement consents for the same area in an ASA. The activity status should be limited discretionary. We also submit that there should be provision to control structures to effect public access to the coast – this necessary to ensure that there is 50m wide access lanes to the shore if lines in a farm exceed 200m in length. There should also be controls over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times.
	2	McLennan	Neil McLennan	2.24	Oppose	Re-consenting farms in AMAs should be a discretionary activity.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.96	Neutral	Make the same changes as sought above regarding Rule 16.4.3 and associated Standards and Matters of Control. Delete the reference to “(‘replacement consent’)” in the body of the Policy, and delete Standard 16.4.4.1. Make consequential amendments to remove references to “existing coastal permit”, “replacement consent”, “equivalent space” or other similar language
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.23	Neutral	Reword Rule 16.4.4 as follows or to like effect: “Marine farming in an ASA using conventional longline structures or intertidal structures for which there is...”. Reword Standard 16.4.5.4 as follows or to like effect: “...the species must be a bivalve or plant species set out in Appendix 11 other than Pacific oysters if the application would introduce them into a CMU where they are not already established, except for ...
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.46	Neutral	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”.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.28	Neutral	Amend rule to include additional matter of control with respect to biosecurity risks. Amend rule so that it provides for intertidal marine farms too. Amend rule so that it does not use the term ‘existing marine farm’.
16.4.4.15	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.97	Support	Retain text.
16.4.5	24	Marlborough District Council	Louise Walker	24.3	Support	Add a new 'Matters over which the Council has reserved control' as follows: 16.4.5.17 the genetic effect on wild populations of farmed species escaping.
	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.37	Neutral	Rule 16.4.5 applies to replacement consent within an AMA. This should be limited discretionary. We also submit that there should be discretion over structures to effect public access to the coast – this necessary to ensure that there is 50m wide access lanes to the shore if lines in a farm exceed 200m in length. There should also be discretion or controls over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. There should also be discretion or controls over genetic and biosecurity issues and also to manage farming density or intensity if required because new species bring different filtration rates or different benthic deposition capacity.
	34	CLIFFORD BAY MARINE FARMS LTD	Quentin Alexander Muir Davies and Kerry Morgan Moor	34.4	Neutral	Amend Rule 16.4.5 to read as follows - deletion indicated by [deletion]: Rule 16.4.5 - Marine farming using conventional longline structures or intertidal structures [deletion] where a replacement consent is being sought or a new consent is required to allow for change of or addition of species or to change the layout of structures on the marine farm in: (i) an AMA for which an existing coastal permit for a marine farm has already been granted under Rule 16.4.3; ...
	86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.9	Neutral	Add new rule provisions Rules 16.4.3.16; 16.4.5.17; 16.5.3.14; and 16.5.4.17 “Effects on cultural values”
	89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.24	Oppose	Resource consent applications under this rule will be considered without public notification and without limited notification. Unacceptable the CMA belongs to the people and furthermore since predicted sea level rise and other climate change issues will arise during the life of this plan. Limited notification providing it includes the SAG members could be an acceptable compromise the same consideration applies to 16.4.4 and 16.4.5
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.36	Neutral	Rule 16.4.5 applies to replacement consent within an AMA. This should be limited discretionary. We also submit that there should be discretion over structures to effect public access to the coast – this necessary to ensure that there is 50m wide access lanes to the shore if lines in a farm exceed 200m in length. There should also be discretion or controls over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times. There should also be discretion or controls over genetic and biosecurity issues and also to manage farming density or intensity if required because new species bring different filtration rates or different benthic deposition capacity.
	2	McLennan	Neil McLennan	2.25	Oppose	Re-consenting farms in AMAs should be a discretionary activity.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.98	Neutral	Amend the rule as follows: Marine farming using conventional longline structures or intertidal structures [where a replacement consent is being sought or a new consent is required to allow for change of or addition of species or to change the layout of structures on the marine farm] in: a) an AMA [deleted] for which an existing coastal permit for a marine farm has already been granted under Rule 16.4.3; or b) [an offshore CMU with an existing coastal permit.] [deleted]
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.47	Neutral	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”.

	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.29	Neutral	Amend rule to include additional matter of control with respect to biosecurity risks. Amend rule so that it also applies to those farms where there is an existing permit granted under 16.4.5, 16.5.3, 16.5.4, 16.6.14. Amend standard and term 16.4.5.4 so that it applies more broadly than species listed in Appendix 11, where those species are already on the existing consent. Amend standard and term 16.4.5.4 so that it is split into two parts for clarity (and to clarify what a marine farm solely authorised for monitoring purposes refers to). Include an advisory note regarding change of species applications that fall beyond the scope of this rule – i.e. those that would be considered as restricted discretionary activities under the NES-MA. Amend rule so that it does not use the term 'existing marine farm'.
16.4.5.1	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.99	Neutral	Amend Standard to read: The consent applicant holds an existing coastal permit to occupy space within the AMA [deleted] for marine farming, granted under Rule 16.4.3, in the location applied for, [or holds an existing coastal permit to occupy space within an offshore CMU].
16.4.5.3	78	Hughes	Ciaran Hughes	78.14	Neutral	Provisions that require relocated marine farms to maintain the same area including but not limited to Policies 13.21.7, 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4 - Amend the variation to remove the requirement that there be no increase to the total area occupied by structures/size of the marine farm. The provisions should permit a large overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA).
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.100	Neutral	Replace "area" with "physical location".
	40	Tester	Jonathon Tester	40.14	Neutral	Provisions that require relocated marine farms to be of the same area including but not limited to Policies 13.21.7; 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4. – Amend the variation to remove the requirement that there be no increase to the total area occupied by structure/size of the marine farm. The provisions should permit a larger overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA).
16.4.5.4	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.24	Neutral	Reword Rule 16.4.4 as follows or to like effect: "Marine farming in an ASA using conventional longline structures or intertidal structures for which there is...". Reword Standard 16.4.5.4 as follows or to like effect: "...the species must be a bivalve or plant species set out in Appendix 11 other than Pacific oysters if the application would introduce them into a CMU where they are not already established, except for ...
16.4.5.6	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.101	Neutral	Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3.
16.4.5.7	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.5	Support	Retain matter over which the Council has reserved control as proposed
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.102	Neutral	Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3.
16.4.5.8	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.103	Neutral	Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3.
16.4.5.9	92	Sanford Limited	Alison Undorf-Lay	92.29	Oppose	Delete this matter of control.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.111	Oppose	Delete this matter of control.
16.4.5.10	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.7	Support	Retain as proposed
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.104	Neutral	Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3.
16.4.5.11	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.105	Neutral	Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3.
16.4.5.12	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.106	Neutral	Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3.

16.4.5.13	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.107	Neutral	Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3.
16.4.5.14	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.108	Neutral	Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3.
16.4.5.15	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.109	Neutral	Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3.
16.4.5.16	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.110	Neutral	Add: "insofar as these are being altered as a result of the change of or addition of species or the change to the layout of structures on the marine farm" to each matter of control. For replacement consents meeting the entry requirements of NESMA regulation 14, make other changes as per submissions in respect of Rule 16.4.3.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.112	Support	Retain text.
16.5	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.10	Neutral	All new decisions that are at a level above Controlled Activity status must be the subject of notified applications for resource consent, to enable iwi and the stakeholder community, communities of knowledge, to participate in the process to increase its robustness.
	89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.26	Oppose	Section 32 Evaluation Marine Farming 4.1.2 Effects on the seabed Before any new farm or transferred can be established then the applicant should at their cost provide a full benthic report out to twice the area it is to occupy. With the entire area being re-examined every 5 years.
	92	Sanford Limited	Alison Undorf-Lay	92.43	Neutral	Delete Replace this policy and associated rules and methods with provisions establishing the layout for marine farming in the Marlborough Sounds after the Plan becomes operative. That should include the layout of both the AMA generally and where individual marine farms within it are to be located, which consent holders can apply, and in what locations; inside eachAMA - i.e. as set out in the MAF-AQNZ yellow-line version As much as possible, all marine farm (backbone length) relocations should be predetermined and allocated on revised CMU maps. Sanford has provided a full set of revised CMU maps with this submission, proposing how the above can be achieved while ensuring Sanford retains the same amount of authorised farming space; refer to Appendix 2 of our submission to view these maps. Within each AMA, identify the individual farms and where they move from and to: (a) Where the farm's position and the direction of lines are the same or less, this move should be a controlled activity. (b) Where the intention is to lay out the farm blocks differently, e.g. a different orientation, it should be a restricted discretionary activity with limited notification to adjoining marine farm owners. (c) Within each of the sites, identify the areas which are farmable (i.e. areas that would contain the farmed species/growing structures and areas which would only be used for moorings); and (d) To record the above in an integrated Sounds-wide map and corresponding database, detailing where every longline will be moved from and where it will be moved to. (e) Where an AMA lacks space for a farm to move into (e.g. Sanford Site 8539), there should be a process for the permit holder to relocate lost lines into equivalent space elsewhere in the Sounds. For example, Sanford Sites 8511 and Site 8512 could be extended with less than a minor impact on CMU integrity. (e) the Plan should provide for this reconciliation as described above as a controlled activity.
16.5.2	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.38	Neutral	Rule 16.5.2 applies to qualify new farms in an ASA as limited discretionary. We submit that these applications should be notified with discretion specifically reserved in full to manage cumulative effects on natural character or natural landscape values and to manage the attainment of ASC Standard pelagic and benthic standards. Discretion should also be specifically reserved over structures to effect public access to the coast – this necessary to ensure that there is at least 50m wide access lanes through to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.37	Neutral	Rule 16.5.2 applies to qualify new farms in an ASA as limited discretionary. We submit that these applications should be notified with discretion specifically reserved in full to manage cumulative effects on natural character or natural landscape values and to manage the attainment of ASC Standard pelagic and benthic standards. Discretion should also be specifically reserved over structures to effect public access to the coast – this necessary to ensure that there is at least 50m wide access lanes through to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times.

	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.25	Support	Retain as notified, with an additional matter of discretion for each rule as follow or to like effect: "Measures to prevent the release or spread of harmful aquatic organisms". Insert an addition to Rule 16.5.2 as follows or to like effect: "Marine farming in an ASA for which no existing coastal permit is held using conventional longline structures or intertidal structures including the associated...".
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.30	Neutral	Amend rule to include additional matter of discretion with respect to biosecurity risks. Amend rule so that it provides for intertidal marine farms too. Amend rule so that it precludes public and limited notification. Create additional rules for marine farming within ASAs, notably: • Finfish farming, as a restricted discretionary activity • New marine farms not otherwise captured by the other rules, as a discretionary activity Include advisory note explaining that re-consenting of marine farms in ASAs (not otherwise provided for by the controlled activity rule) is provided for as a restricted discretionary activity under the NES-MA regulations.
16.5.2.3	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.115	Neutral	Delete reference to "and droppers"
16.5.2.11	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.116	Neutral	Delete reference to "droppers" Replace "trigger levels in" with "trigger levels determined in accordance with"
16.5.3	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.39	Neutral	Rule 16.5.3 applies to qualify a new farm in an AMA as limited discretionary. We make the same submission for this policy as we do for Policy 16.5.2:  Rule 16.5.2 applies to qualify new farms in an ASA as limited discretionary. We submit that these applications should be notified with discretion specifically reserved in full to manage cumulative effects on natural character or natural landscape values and to manage the attainment of ASC Standard pelagic and benthic standards. Discretion should also be specifically reserved over structures to effect public access to the coast – this necessary to ensure that there is at least 50m wide access lanes through to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times.
	86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.10	Neutral	Add new rule provisions Rules 16.4.3.16; 16.4.5.17; 16.5.3.14; and 16.5.4.17 "Effects on cultural values"
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.38	Neutral	Rule 16.5.3 applies to qualify a new farm in an AMA as limited discretionary. We make the same submission for this policy as we do for Policy 16.5.2:  Rule 16.5.2 applies to qualify new farms in an ASA as limited discretionary. We submit that these applications should be notified with discretion specifically reserved in full to manage cumulative effects on natural character or natural landscape values and to manage the attainment of ASC Standard pelagic and benthic standards. Discretion should also be specifically reserved over structures to effect public access to the coast – this necessary to ensure that there is at least 50m wide access lanes through to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.117	Neutral	If the alternative regime proposed by the industry is adopted: a. Add "and Standard 16.4.3.3" after "16.4.3.2"; OR b. Alternatively, delete reference to "Standard 16.4.3.2" in Rule 16.4.3. AND Standard 16.5.3.1 should be replaced with Standard 16.5.4.1, because the consent holder will already hold a coastal permit and would not need an authorisation to apply to increase the longline length. AND Delete the words "(it is a new farm and not replacing an existing farm)".
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.26	Support	Retain as notified, with an additional matter of discretion for each rule as follow or to like effect: "Measures to prevent the release or spread of harmful aquatic organisms". Insert an addition to Rule 16.5.2 as follows or to like effect: "Marine farming in an ASA for which no existing coastal permit is held using conventional longline structures or intertidal structures including the associated...".
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.31	Oppose	It is unclear what the rule is trying to achieve. It appears the rule is duplicating the NES-MA in part, as it relates to re-consenting (within the scope of the NES-MA, i.e. not farms relocating or realigning more than one-third of the existing marine farm), so should be removed and replaced with an advisory note pointing to those regulations.
	16.5.3.4	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.118	Neutral
16.5.3.5	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.8	Support	Retain matter over which the Council has reserved control as proposed
16.5.3.7	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.10	Support	Retain matter over which the Council has reserved control as proposed
16.5.3.12	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.119	Neutral	Replace "trigger levels in" with "trigger levels determined in accordance with".

16.5.4	78	Hughes	Ciaran Hughes	78.15	Neutral	Provisions that require relocated marine farms to maintain the same area including but not limited to Policies 13.21.7, 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4 - Amend the variation to remove the requirement that there be no increase to the total area occupied by structures/size of the marine farm. The provisions should permit a large overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA).
	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.40	Neutral	Rule 16.5.4 applies to an qualify an extension of surface area of an existing farm within an AMA as limited discretionary. We submit that these applications should be notified with discretion specifically reserved in full to manage cumulative effects on natural character or natural landscape values and to manage the attainment of ASC Standard pelagic and benthic standards. Discretion should also be specifically reserved over structures to effect public access to the coast – this necessary to ensure that there is at least 50m wide access lanes to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times.
	86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.11	Neutral	Add new rule provisions Rules 16.4.3.16; 16.4.5.17; 16.5.3.14; and 16.5.4.17 “Effects on cultural values”
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.39	Neutral	Rule 16.5.4 applies to an qualify an extension of surface area of an existing farm within an AMA as limited discretionary. We submit that these applications should be notified with discretion specifically reserved in full to manage cumulative effects on natural character or natural landscape values and to manage the attainment of ASC Standard pelagic and benthic standards. Discretion should also be specifically reserved over structures to effect public access to the coast – this necessary to ensure that there is at least 50m wide access lanes to the shore if lines in a farm exceed 200m in length. There should also be discretion over the use of synthetic structures, such as plastic ties and structure rope, and over operation times to protect amenity and to avoid noise at inappropriate times.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.120	Neutral	This provision might end up being a duplication and consequently can be deleted.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.27	Support	Retain as notified, with an additional matter of discretion for each rule as follow or to like effect: “Measures to prevent the release or spread of harmful aquatic organisms”. Insert an addition to Rule 16.5.2 as follows or to like effect: “Marine farming in an ASA for which no existing coastal permit is held using conventional longline structures or intertidal structures including the associated...”.
	40	Tester	Jonathon Tester	40.15	Neutral	Provisions that require relocated marine farms to be of the same area including but not limited to Policies 13.21.7; 13.22.8, standards 16.4.3.3; 16.4.5.3, rule 16.5.4. – Amend the variation to remove the requirement that there be no increase to the total area occupied by structure/size of the marine farm. The provisions should permit a larger overall farm footprint and allow flexibility to reconfigure a farm (including where farms are relocated from shallower sites to deeper sites in order to allow for longer anchor warps, a workable farm layout, and wider spacing between longlines depending on the shape of the allocated AMA).
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.32	Neutral	Amend rule so that it also applies to those farms where there is an existing permit granted under 16.4.5, 16.5.3, 16.5.4, 16.6.14. Amend rule to include additional matter of discretion with respect to biosecurity risks. Amend rule so that it does not use the term ‘existing marine farm’. Amend rule so that it precludes public and limited notification.
16.5.4.5	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.121	Neutral	Delete reference to “and droppers”
16.5.4.7	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.9	Support	Retain matter over which the Council has reserved control as proposed
16.5.4.9	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.122	Oppose	Delete the matter of discretion.
16.5.4.10	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.11	Support	Retain matter over which the Council has reserved control as proposed
16.5.4.15	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.123	Neutral	Replace “trigger levels in” with “trigger levels determined in accordance with”.
16.5.5	9	Littlefield	Rod Littlefield	9.2	Oppose	Variation 1A Oppose finfish farming in the Marlborough sounds
	89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.21	Neutral	Restricted Discretionary Activities. In order to appropriately address the standards and terms, it will be necessary for the Council to have an independent analysis of the application, which has to be, peer-reviewed. Council lacks the necessary expertise to on their own analyses and evaluate any reports provided by any applicant. Until such time as the Council has the appropriate skills in this area things such as local knowledge from the community needs to be given weight.

	57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.9	Oppose	Delete rule and replace with a rule which is consistent with NESMA, and make consequential changes to the policies from which Rule 16.5.5 was derived.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.43	Support	Variation 1A: Retain as notified.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.33	Neutral	The rule is duplicating the NES-MA in part, as it relates to re-consenting (within the scope of the NES-MA, i.e. not farms relocating), so should be removed and replaced with an advisory note referencing those regulations. Amend rule so that it does not use the term 'existing marine farm'. Amend rule so that it is clear whether an applicant can apply for a consent to move into a proposed AMA prior to allocation of authorisations.
16.5.5.4	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.12	Support	Retain matter over which the Council has reserved control as proposed
16.5.5.6	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.54	Neutral	Amend 16.5.5.6 to clarify what 'other method' means.
16.5.5.13	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.13	Support	Retain matter over which the Council has reserved control as proposed
16.5.5.18	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.55	Neutral	Amend 16.5.5.18 to remove reference to Policy 13.22.1.
16.6	85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.12	Oppose	Amend Rule 16.6 to read: "Other than in Off-shore CMU 8A – Te Tai o Marokura, m(M)arine farming in an off-shore CMU...."  Add an appropriate rule for marine farming in open coastal waters within the Ngāi Tahu takiwā after a policy position has been developed in consultation with Te Rūnanga of Ngāi Tahu and Te Rūnanga o Kaikōura and add to the proposed plan by way of a variation.
	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.11	Neutral	All new decisions that are at a level above Controlled Activity status must be the subject of notified applications for resource consent, to enable iwi and the stakeholder community, communities of knowledge, to participate in the process to increase its robustness.
	89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.27	Oppose	Section 32 Evaluation Marine Farming 4.1.2 Effects on the seabed Before any new farm or transferred can be established then the applicant should at their cost provide a full benthic report out to twice the area it is to occupy. With the entire area being re-examined every 5 years,
16.6.13	24	Marlborough District Council	Louise Walker	24.6	Support	To amend Rule 16.6.13 to only reference 'new' marine farms and to add a note directing plan users to the NESMA when considering a replacement consent. Amend rule to read (new text between **): 16.6.13 \tA **new** marine farming in an Offshore CMU, including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water. **Note: Rule 16.6.13 does not apply to replacement consents for existing marine farms in the Offshore CMU that are managed under the National Environment Standards for Marine Aquaculture.**
	34	CLIFFORD BAY MARINE FARMS LTD	Quentin Alexander Muir Davies and Kerry Morgan Moor	34.5	Neutral	Amend Rule 16.6.13 to read as follows - additions are indicated by [ ]: Rule 16.6.13 Marine farming in an Offshore CMU [which is a new application for which a coastal permit has not previously been granted] including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water.
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.29	Neutral	Replacement Consents Ensure consistency with NESMA, by adding the word "New" to the start of Rule 16.6.3. AND Add a new non-notified controlled activity rule for replacement consents for Offshore marine farms. New Consents Amend wording to read "Marine farming (including finfish farming) in an Offshore CMU, including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water." Amend wording to read "Marine farming (including finfish farming) in an Offshore CMU, including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water."
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.125	Neutral	Ensure consistency with NESMA, by adding the word "New" to the start of Rule 16.6.3. AND Add a new non-notified controlled activity rule for replacement consents for offshore marine farms, as per above submission in respect of rule 16.4.5.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.28	Support	Retain as notified, except for Rule 16.6.14.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.34	Neutral	Amend the rule so that it only applies to new marine farming in the Offshore CMU. Include an advisory note explaining that re-consenting of marine farms in Offshore CMU is provided for as a restricted discretionary activity under the NES-MA regulations.
16.6.14	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.41	Support	We agree that residual "within AMA" activities should be discretionary.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.40	Support	We agree that residual "within AMA" activities should be discretionary.



		92	Sanford Limited	Alison Undorf-Lay	92.30	Neutral	Insert a space after "ancillary discharges to water" so that the remaining part of the sentence relates to both 16.6.14(a) and (b). AND Replace "Prohibited Activity" with "Discretionary Activity".
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.126	Oppose	Delete Rule 16.6.14(a) Overlaps with rule 16.4.3. This appears to be a typographical error.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.127	Neutral	Provide for NESMA; AND for farms falling outside NESMA: Insert a space after "ancillary discharges to water" so that the remaining part of the sentence relates to both 16.6.14(a) and (b). AND Replace "Prohibited Activity" with "Discretionary Activity".
		79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.29	Neutral	Reword as follows or to like effect: "Marine farming within an AMA, for which a) an authorisation is held to apply for a coastal permit to occupy space with the AMA, or b) there is an existing coastal permit to occupy space within the AMA for marine farming in the same location, including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water,_____ that is not provided for as a Controlled, Restricted Discretionary Activity or Prohibited Activity."
		68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.35	Neutral	Amend part (a) of the rule so that it relates only to new marine farming in AMAs. Remove part (b) of the rule as it is more stringent than the NES-MA. Include advisory note explaining that re-consenting of marine farms in AMAs (not otherwise provided for by the controlled activity rules) is provided for as a restricted discretionary activity under the NES-MA regulations. Amend rule so that it is clear whether an applicant can apply for a consent to move into a proposed AMA prior to allocation of authorisations.
16.6.15		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.42	Neutral	No consideration has been given to the potential risks of the discharge of feed or medicinal or therapeutic compounds associated with conventional long line bi-valve filter feeder farming. This is pertinent given the activity covers such a potentially wide area. We submit that this should thus be a prohibited activity unless and until there has been comprehensive study undertaken of the potential environmental risks of such a wide reaching practice.
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.41	Oppose	No consideration has been given to the potential risks of the discharge of feed or medicinal or therapeutic compounds associated with conventional long line bi-valve filter feeder farming. This is pertinent given the activity covers such a potentially wide area. We submit that this should thus be a prohibited activity unless and until there has been comprehensive study undertaken of the potential environmental risks of such a wide reaching practice.
		83	Friends of Nelson Haven and Tasman Bay Inc	Rob Schuckard	83.12	Neutral	Use of mentioned compounds should be prohibited to be used in all circumstances in coastal marine zone. Move this paragraph to prohibited chapter.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.128	Neutral	Add "that is not otherwise provided for as a Controlled or Restricted Discretionary Activity" to the end of this rule; AND Ensure consistency with NESMA.
		79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.30	Support	Retain as notified, except for Rule 16.6.14.
		68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.36	Neutral	Amend the rule so that it only applies to new marine farming. Include an advisory note explaining that discharges associated with re-consenting of marine farms are provided for as a restricted discretionary activity under the NES-MA regulations. Amend the rule so that it specifically exclude applications for finfish farming made under Rule 16.5.5.
16.7		6	Mansfield	Peter Allen Mansfield	6.2	Neutral	Marine farms 8090, 8091, 8092, 8093, 8094 & 8095 Rezone the coastal marine area fronting Lot 3 DP 19539 and Lot 1 DP 20420 as Coastal Marine Zone 1 to preserve the significant natural character and recreational value of the area.  [Inferred]
		24	Marlborough District Council	Louise Walker	24.5	Support	Amend 16.7.9 as follows (new text between **): 16.7.9 Marine farming, **other than finfish farming**, inside an Enclosed Waters CMU or a Near-shore CMU, and not within an AMA, including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water, and the discharge of feed or medicinal or therapeutic compounds, associated with a marine farm. And add new rule to read: **16.7.9A Finfish farming inside an Enclosed Waters CMU or a Near-shore CMU, and not within an FAMA, including the associated occupation of space in the coastal marine area, the erection, placement, use of structures, disturbance of the seabed and ancillary discharges to water, and the discharge of feed or medicinal or therapeutic compounds, associated with a marine farm.**
		85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.13	Oppose	Amend Rule 16.7 to read: "Other than in Enclosed CMU 38A – Te Tai o Marokura, m(M)arine farming inside an Enclosed CMU or Near-shore CMU and not within an AMA...."  Add an appropriate rule for marine farming in enclosed waters within the Ngāi Tahu takiwā after a policy position has been developed in consultation with Te Rūnanga of Ngāi Tahu and Te Rūnanga o Kaikōura, and added to the proposed plan by way of a variation.
		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.43	Support	Rule 16.7.9 – we agree that marine farming should be a prohibited activity outside of an AMA.

	76	Marlborough Aquaculture Limited	David Clark	76.1	Oppose	Amend standard 16.7 so that it exempts existing marine farms even if they are not in an AMA.
	86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.13	Support	To support the prohibited status of farms outside of AMA's
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.42	Support	Rule 16.7.9 – we agree that marine farming should be a prohibited activity outside of an AMA.
	80	Browning	Steffan Browning	80.1	Support	I support the Prohibited Activities intention in Volume 2 16.7, that protect the values as supported through many appeals to the Environment Court, by Friends of Nelson Haven and Tasman Bay and others.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.129	Neutral	Rule 16.7.9 The words “and the discharge of feed or medicinal or therapeutic compounds” are unnecessary. Delete those words.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.31	Support	Retain as notified.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.37	Neutral	Rule 16.7.9 Refer to Schedule 2 for commentary on interactions with the NES-MA.
16.8	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.44	Support	Rule 16.8 – we agree with a rule that applications cannot be made without authorisations.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.43	Support	Rule 16.8 – we agree with a rule that applications cannot be made without authorisations.
16.8.1	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.45	Support	Rule 16.8.1 – we agree with Council suspending the receipt of applications and effecting the ability to process and hear together applications in common area.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.44	Support	Rule 16.8.1 – we agree with Council suspending the receipt of applications and effecting the ability to process and hear together applications in common area.
	92	Sanford Limited	Alison Undorf-Lay	92.31	Support	Retain provision
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.30	Oppose	Delete rule in its entirety.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.130	Oppose	Delete rule.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.32	Support	Retain as notified.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.38	Neutral	Amend the allocation rules contained in Rules 16.8.1 and 16.8.2 to ensure the allocation of authorisations enables the transition to this new configuration to occur in the most efficient and effective way possible. Amend variation provisions as necessary so that only the term “Offshore CMU” is used to refer to the Offshore CMU.
16.8.2	85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.16	Oppose	Amend Rule 16.8.2 by adding to the start of the rules the words: “Other than in Enclosed CMU 38A and Open Water CMU 8A – Te Tai o Marokura, a(A)authorisations for finfish marine farms will only...  Add appropriate rules for finfish farming in the Ngāi Tahu takiwā after a policy position has been developed in consultation with Te Rūnanga of Ngāi Tahu and Te Rūnanga o Kaikōura; and add these rules to the proposed plan by way of a variation.
	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.46	Neutral	we refer to our submissions on Policy 13.21.7 and submit that Rule 16.8.2 should be amended to follow those submission points, including with regard to allocations being publicly tendered from the second AMA consent term and beyond, that allocations should also only be made if and to the extent that marine farming activity is and will be in accordance with the pelagic and benthic effect standards of the ASC Standard. Council must also reserve discretion to allocate first term AMA authorisations by tender if and to the extent that the procedure proposed of allocating first term consents to existing consent holders becomes too impractical or inefficient to implement.
	90	Clova Bay Residents Association Incorporated	Trevor Offen	90.45	Neutral	we refer to our submissions on Policy 13.21.7 and submit that Rule 16.8.2 should be amended to follow those submission points, including with regard to allocations being publicly tendered from the second AMA consent term and beyond, that allocations should also only be made if and to the extent that marine farming activity is and will be in accordance with the pelagic and benthic effect standards of the ASC Standard. Council must also reserve discretion to allocate first term AMA authorisations by tender if and to the extent that the procedure proposed of allocating first term consents to existing consent holders becomes too impractical or inefficient to implement.
	92	Sanford Limited	Alison Undorf-Lay	92.32	Neutral	Make necessary consequential amendments if the alternative allocation regime proposed by MFA/AQNZ is not adopted.
	92	Sanford Limited	Alison Undorf-Lay	92.33	Oppose	Rule 16.8.2.6 - Replace this rule with one which provides for farms that lose space and/or authorised lines in the relocation to be added to other sites in the same ownership irrespective of which CMU they are in.
	92	Sanford Limited	Alison Undorf-Lay	92.34	Oppose	16.8.2.9 - Delete Rule 16.8.2.9.

	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.31	Neutral	Support MFA/AQNZ Decision Sought to make necessary consequential amendments if the allocation regime proposed by MFA/AQNZ is adopted. Wakatū alternative Decision Sought: Amend rule 16.8.2 so that it reads "Rules to allocate new space in the common marine and coastal area using authorisations." Amend rule 16.8.2.1 to read, "The Council will allocate new space for marine farming within Enclosed Water CMUs and the Near-shore CMUs (excluding the area within ASAs) by allocating authorisations to occupy space." Amend rule 16.8.2.2 to read "Authorisations will only be allocated for new space within areas identified as AMAs in the plan."
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.32	Neutral	Adopt Decisions Sought by MFA/AQNZ. Note that Wakatū/Kono is particularly concerned under Rule 16.8.2.9 that it should not be penalised because other farmers do not choose to uplift the authorisations. It considers that such an approach is not lawful under the RMA and the National Environmental Standards for Marine Aquaculture, and this rule must be deleted.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.131	Neutral	Amendments will be necessary if the allocation regime proposed by MFA / AQNZ is adopted. Make necessary consequential amendments.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.132	Neutral	Amend to allow for a transition period of up to 24 months. OR Clarify application of policy.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.133	Neutral	Rule 16.8.2.4 The cross-reference to "Policy 13.21.7 (6)(b)" is a typo and needs to be corrected.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.134	Oppose	Delete "authorisations by public tender" at end of rule, and replace with rule consistent with Policy 13.21.7 as above.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.135	Neutral	Replace "within 6 months" with "within 24 months".
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.136	Oppose	Delete Rule 16.8.2.9.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.33	Support	Retain as notified.
	79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.44	Support	Variation 1A: Retain as notified.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.39	Neutral	Amend the allocation rules contained in Rules 16.8.1 and 16.8.2 to ensure the allocation of authorisations enables the transition to this new configuration to occur in the most efficient and effective way possible.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.40	Neutral	Amend Rule 16.8.2.4 as follows: Allocation will not be by public tender, except in the circumstances set out in Policy 13.21.7 [(d)] [deleted].
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.41	Oppose	Remove Rule 16.8.2.6.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.42	Neutral	Amend Rule 16.8.2.8 (and make consequential amendments to other rules) in consultation with industry to ensure operational considerations are taken into account.
	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.43	Neutral	Amend Rule 16.8.2.9 to provide greater certainty about how the allocation of authorisations will occur in practice.
	16.8.2.10	Ministry for Primary Industries (MPI)	Michael Nielsen	68.44	Neutral	Amend Rule 16.8.2.10 as follows: Authorisations for [deleted] marine farms [involving finfish aquaculture] will only be allocated space within a FAMA
	16.8.2.11	Ministry for Primary Industries (MPI)	Michael Nielsen	68.45	Neutral	Amend Rule 16.8.2.11 so that the Council must first attempt to allocate authorisations in FAMAs to other finfish farmers before being allocated to non-fish farmers.
	New provision	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.15	Neutral	Variation 1A : Finfish Farming. It should be mandatory that all and every person employed by the Aquaculture Industry must be a) A permanent resident of New Zealand b) Be subject to minimum standards as per wages and employment issues set by Central Government. c) Must prove they have all current certifications as per current and any future vaccination requirements. d) Have addressed and attended an appropriate meeting regarding water safety issues. e) Must each have their own appropriate life jacket.
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.44	Neutral	Rules need to be amended to protect authorisation holder in that situation.
	27	Ayakulik Limited	Peter Radich	27.3	Oppose	To add a new rule 16.6.15: 'The extension of Existing Marine Farms within an AMA.' (so that such extensions are able to be applied for by resource consent as a discretionary activity).
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.113	Support	Add new rules consistent with NESMA where not provided for as a controlled activity.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.114	Support	Add new rules consistent with NESMA where not provided for as a controlled activity.
	72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.124	Support	Add new discretionary activity rule providing for conservation aquaculture, carbon capture aquaculture, or remedial aquaculture (regardless of whether the application area is within an AMA).

Chapter: 25	AMA	107	Ngāi Tahu Seafood	Thomas Hildebrand	107.2	Neutral	Amend the definition of AMA to recognise that an ASA could be used for all types of aquaculture, and so could be both an ASA and a FAMA.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.1	Neutral	Provision should be redrafted along the lines of "AMA or Aquaculture Settlement area means ..." or delete reference to "aquaculture settlement area (ASA)" in the AMA definition. Without prejudice to the primary submission that Variation 1A should be withdrawn and that Variation 1 should not apply to finfish farming, state precisely where AMAs includes FAMAs and/or ASAs throughout the variation.
		57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.3	Oppose	Subject to the primary submission above, amend the definition of "AMA" to remove "FAMA" from the definition of "AMA".
		68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.1	Neutral	Amend the definition of AMA so that it applies only to AMAs. Consequential amendments throughout variation provisions to ensure objectives, policies, rules and methods apply to the relevant management area, i.e. all or only some of AMAs, FAMAs, ASAs – subsequent submission points note where this should occur.
	ASA	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.7	Neutral	Amend the definition of ASA as follows: means an aquaculture settlement area [deleted] set aside for applications from iwi under the Māori Commercial Aquaculture Claims Settlement Act 2004 [(including, but not limited to, those labelled as ASA on the planning maps)].
	CMU	85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.4	Oppose	Stipulate in the definitions that the boundary between the Off-shore CMU and Enclosed Water CMUs is 500m from mean high-water springs.
		89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.1	Neutral	Add to definition all of Queen Charlotte Sound plus 1000 metres from any Marine Reserve and/or on the coast side of any wildlife sanctuary.
	Conventional longline structures	34	CLIFFORD BAY MARINE FARMS LTD	Quentin Alexander Muir Davies and Kerry Morgan Moor	34.7	Neutral	Amend the definition to read as follows - additions are indicated by [ ]: Conventional longline structures means the use of longline structure technology and layout, such as a single or double backbone line and spherical or capsule-shaped floats, and [includes longlines with subsurface backbones and] any future technological changes that do not substantially alter the concept of a longline layout.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.2	Neutral	Amend definition by adding the words "longlines with subsurface backbones and" after "and includes".
	Enclosed Water CMU	86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.2	Neutral	Edit the definition as Wataia Bay is mentioned twice in the definition of Enclosed CMU.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.3	Support	Delete duplication of "Waitata Bay" and correct typo ("Kenepuru").
		68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.2	Neutral	Amend the definition of Enclosed Water CMU to: a) Remove second occurrence of Waitata Bay in the list b) Re-order the list so that it is in alphabetical order
	Existing marine farm	76	Marlborough Aquaculture Limited	David Clark	76.9	Oppose	Amend the definition of "Existing marine farm" to add the following "...and includes a marine farm or a marine farm extension applied for prior to the date upon which MEP variation 1 was notified."
		92	Sanford Limited	Alison Undorf-Lay	92.1	Support	Retain definition as proposed
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.4	Support	Retain provision.
		68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.3	Neutral	No amendment to the definition of "Existing marine farm", however amendments to the relevant policies and rules where use of this term causes issues are identified in submission points 23, 30, 31, 34 and 35.
	Finfish AMA	57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.4	Oppose	Amend definition to read: "Finfish AMA or FAMA means ..."
		79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.2	Neutral	(1) Reword the definition of AMA as follows or to like effect: "means an aquaculture management area or an aquaculture settlement area (ASA) or a Finfish AMA (FAMA) identified on the planning maps as an AMA or ASA or FAMA.  (2) Insert a new definition as follows or to like effect: "Finfish AMA means a finfish aquaculture management area identified on the planning maps as FAMA." Retain all other definitions as notified.
	Important species	111	Te Ātiawa Manawhenua Ki Te Tau Ihu Trust	Ian Shapcott	111.5	Neutral	A place saver is required, within Variation 1, so that iwi can populate this provision over time.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.5	Support	Retain definition subject to changes to associated policies being accepted.
	Intertidal marine farming	68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.4	Neutral	Amend definition to align with the definition of 'inter-tidal marine farm' in regulation 3 of the NES-MA.
	Marine farm	92	Sanford Limited	Alison Undorf-Lay	92.2	Neutral	Amend the definition so that it is clear it relates to permits and locations contiguous with existing marine farms.

			72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.6	Neutral	Amend the definition of "Marine Farm" to read: means a [deleted] spatial area used for aquaculture activities (as defined in section 2 RMA) that has or requires a coastal permit for the occupation of the coastal marine area and which may also have or require coastal permits that authorise one or more of the following activities: the erection, placement, and use of any structures for aquaculture; and any associated disturbance of the foreshore and seabed, and ancillary deposition or discharges in the coastal marine area. [Each marine farm is given a unique site number by the Marlborough District Council]. Marine farming has the related meaning. [For the avoidance of doubt, this does not include: a. Conservation aquaculture, defined as the use of human cultivation of an aquatic organism for the planned management and protection of a natural resource; or b. Structures resting on the seabed, such as craypots.]
			68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.5	Neutral	Amend definition as follows: "...means a [deleted] [space] used for aquaculture activities (as defined in section 2 RMA) that..."
	Near-shore CMU		24	Marlborough District Council	Louise Walker	24.7	Support	The Coastal Section – Outer Pelorus and Chetwode Islands/Titi Island/Forsyth Island CMUs constitute part of the 'Near-shore CMU' group and should be included in the definition as follows (new text between **): Near-shore CMU means any of the following CMUs: South Marlborough, **Coastal Section – Outer Pelorus,** Coastal Section - Cook Strait, D'Urville Island, **Chetwode Islands/Titi Island/Forsyth Island**.
			86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.1	Neutral	Include Coastal Section Outer Pelorus (CMU 9) and Chetwode Islands, Titi Island and Forsyth Island (Nga Motu) (CMU 5) in the near-shore CMU definition.
	New provision		92	Sanford Limited	Alison Undorf-Lay	92.3	Support	Add new definition: 'Equivalent space' means equivalent in terms of farming production or its utility (e.g. spat catching/holding) and the ability to use that space.
			61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.1	Support	Add definition of Aquaculture Activities from the RMA into the Definitions Section.
			72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.7	Support	Add new definition for "the Values Report 2018"
			72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.8	Support	Add new definition: "Equivalent space" means equivalent in terms of relevant farming characteristics, production potential, size, length of backbone, and the efficacy of farming that space.
			72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.9	Support	Add new definition: "Backbone" means either a single or double line supported by floats which runs at the surface of the water or sub-surfaced and from which growing structures are suspended. Typically the ends of the backbone are marked by orange floats
			72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.10	Support	Add new definition: "Length of backbone" means the distance between the furthest floats measured in metres. In the case of intertidal oyster racks, length of backbone means the length of racks.
			79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.45	Support	Add a Definition of "Enrichment Stage (ES)" to the Definitions in Volume 2, Chapter 25. This definition should specifically refer to the Best Management Practice Guidelines for salmon farms in the Marlborough Sounds: Benthic environmental quality standards and monitoring protocols 2019 (1 Keeley, N; Gillard, M; Broekhuizen, N; Ford, R; Schuckard R; Ulrich S. 2019).
	Offshore CMU		85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.5	Oppose	Stipulate in the definitions that the boundary between the Off-shore CMU and Enclosed Water CMUs is 500m from mean high-water springs.
			68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.6	Neutral	Amend variation provisions as necessary so that only the term "Offshore CMU" is used to refer to the Offshore CMU.
Volume Three	Appendix: 11	Appendix item: Species authorised to be farmed within the Marlborough region's coastal waters	8	Simpson	Christine Simpson	8.3	Support	Variations 1 & 1A Support all provisions
			24	Marlborough District Council	Louise Walker	24.15	Support	Typographic error in the appendix. Amend spelling as follows: <i>Lessonia variegata</i>
			107	Ngāi Tahu Seafood	Thomas Hildebrand	107.19	Neutral	Add the following to Appendix 11: Sea cucumber ( <i>Stichopus molis</i> ) Geoduck ( <i>Panopea zelandica</i> )
			89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.14	Oppose	Farming of scallops in the Sounds should not be authorised species. It is recommended that any species not currently in the Sounds as an indigenous species should have to prove it is acceptable species and be introduced on a limited and well monitored basis before becoming an acceptable farming species.  Amend seaweed to address only indigenous varieties that are already naturally occurring within the surrounding area. [Inferred]
			92	Sanford Limited	Alison Undorf-Lay	92.35	Oppose	Amend the list so that it is not species-specific and replace it with more generic terms such as • Finfish • Seaweeds • Molluscs etc
			61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.43	Neutral	Include provisions which allow for review and addition of additional species; or alternatively delete Appendix and specify in rules and policies by way of standards or conditions (in broad terms) the types of bivalves for which applications can be made as a controlled (or discretionary) activity.

		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.137	Neutral	Retain Appendix 11 as it pertains to Rule 16.4.5; AND Add additional rules and policies consistent with NESMA.
		79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.34	Support	Retain as notified.
Volume Four	All CMU	85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.6	Oppose	Insert topographical features into the base layer of Planning Maps 1-16 so the location of CMUs relative to landmarks can be deduced.  Identify the latitudinal and longitudinal extent of each CMU and any AMAs and FAMAs in Volume 4 as is done for Tasman District and other areas in Schedule 3 of the Resource Management (National Environmental Standards for Marine Aquaculture) Regulations 2020.
		91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.49	Neutral	For the reasons given in submissions we submit that the extent and location of CMU's and AMAs has not been appropriately determined and as such the CMUs and AMAs as depicted in the proposed overlay maps do not represent appropriate CMUs or AMAs.
		43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.31	Neutral	Make consequential changes to adjoining CMU and AMA maps where the CMU for a bay is depicted on more than one map.
		113	Talley's Group Limited	R D Sutherland	113.48	Neutral	Make consequential changes to adjoining CMU and AMA maps where the CMU for a bay is depicted on more than one map.
		86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.14	Neutral	For Council to undertake an expert review of cultural values for each CMU
		89	Queen Charlotte Sound Residents Association	Monyeen Wedge	89.22	Neutral	It is important that the 'legend' has attached to same a written analysis of the full meaning inclusive of laypersons language to understand what an allocation means. The sea and coastal waters belong to all the people of New Zealand and the proposed variation should have given weight to the remoteness of many areas and the limited ability of some permanent residents to access the Internet or indeed understand the technical and legal language of these documents.  The Council in addressing issues for remote and isolated areas of the Marlborough Sounds must address guidance Document as per 1A and make available to all the Marlborough Sounds community the full proposal from the Ministry of Primary Industries. This proposal must of course have addressed the New Zealand Coastal Policy Statement (2010).
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.8	Neutral	We also submit that 'mean low water' should be objectively defined in order to avoid confusion or disputes over where an AMA's geometric location should be actually measured from. We submit that 'mean low water' should be defined as mean low water springs as this point can be objectively determined by reference to chart datums.
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.48	Neutral	For the reasons given in submissions we submit that the extent and location of CMU's and AMAs has not been appropriately determined and as such the CMUs and AMAs as depicted in the proposed overlay maps do not represent appropriate CMUs or AMAs.
		92	Sanford Limited	Alison Undorf-Lay	92.7	Neutral	Sanford has provided a full set of maps for all Coastal Management Units (CMU) with this submission and signals that it will speak about the proposed yellow lines during the oral hearing. (Refer to Appendix 2 attached to submission). Sanford seeks that the yellow line versions of AMAs replace the Council's proposed redline versions. Sanford supports the AMA seaward and inshore boundaries, being shown as broken yellow lines denoting that some flexibility would significantly assist in the final relocation positioning. Once the farm is relocated, we propose that the colour of the AMA line change to red. Throughout the farm relocation process, Sanford seeks that the Council set up a 'backbone reconciliation inventory' in which an account is kept for each marine farm business tracking their authorised backbone metres (Dec 2021) against relocated backbone metres to ensure equivalent space is achieved. Where new space within the CMU is identified for new farms, this should be allocated to existing farmers needing to reconcile 'lost' backbone length rather than to new farmers.
		92	Sanford Limited	Alison Undorf-Lay	92.40	Neutral	Variation 1 and 1A list of inappropriately located farms should mirror the agreement of the MAWG, less the two farms where the tubeworms were subsequently identified as exotic (Site 8258 and Site 8259). Sanford signals that it agrees to amend the location of our sites which were identified in the MAWG process, by either: - • moving the farm in its entirety, • removing some lines or • spreading 'inappropriate lines' across other Sanford farms such as For example, Site 8555 in Clova Bay, which could be relocated to Site 8550 and Site 8548. Relocate Crail Bay Site 8539 by adding one line width to the Sanford farms on the other side of the Bay and widening that AMA accordingly. Allocate in the proposed Plan AMAs for all farms (including those deemed inappropriate), i.e. show where Site 8212 will move to. Reinstate Site 8299 and Site 8300. These are important spat holding and seed growing areas that cannot be replicated in alternative locations. They were also not part of the MAWG identified inappropriate farms discussion.
		92	Sanford Limited	Alison Undorf-Lay	92.42	Neutral	Amend the AMA boundaries for all CMU as proposed in mapping attached to the submission.

		61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.45	Neutral	Where existing farms are relocated, no line spacing or production capacity is lost as a result of the move, and that the plan provisions are sufficiently detailed to allow flexibility to allow some movement within the scope of an AMA to allow for, for instance, a realignment for ecological reasons
		80	Browning	Steffan Browning	80.2	Oppose	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.
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.55	Neutral	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	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.142	Neutral	Replace maps with attached MFA/AQNZ mapping. Amend mapping to include outer Sounds farms within AMAs as per MFA/AQNZ mapping. Refer also submissions made in the covering document
		72	Marine Farming Association Incorporated and Aquaculture New Zealand	Q A M Davies, A L Hills and E L Deason	72.144	Neutral	Amend the Index and mapping to make them more user friendly. That might be achieved by, for example: a. Amending the "Coastal Management Units & Aquaculture Management Areas" maps by replacing the CMU identifier numbers with the names of the CMUs; AND b. Replacing either the map numbers or CMU identifier numbers with letters; AND c. Amending the Index so that the reader knows which map number to turn to for any given CMU.
		75	Clearwater Mussels Limited	R D Sutherland	75.30	Neutral	Make consequential changes to adjoining CMU and AMA maps where the CMU for a bay is depicted on more than one map.
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.27	Neutral	Make consequential changes to adjoining CMU and AMA maps where the CMU for a bay is depicted on more than one map.
		57	THE NEW ZEALAND KING SALMON CO. LIMITED	Q A M Davies, A L Hills and E L Deason	57.10	Oppose	Delete maps. If maps are to be retained, make changes in accordance with this submission, in addition to any necessary consequential changes.
		79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.38	Support	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. 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.
		79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.49	Support	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.
		11	Okiwi Bay Ratepayers Association	Tim Greenhough	11.2	Support	We agree with the principal with shifting the Marine Farms that affect the visual impact of the Croisilles Harbour, and Sounds area.
		68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.46	Neutral	Assess any other AMAs and FAMAs proposed to be included in these variations against the principles in Policy 13.21.3 (noting our submission points regarding the application of those principles to FAMAs), and only consider them for addition if they meet these principles.
		68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.53	Neutral	Amend variation provisions as necessary so that only the term "Offshore CMU" is used to refer to the Offshore CMU.
All AMA in a CMU		85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.2	Oppose	Add to Volume 4 two new CMUs: CMU 38A –Te Tai o Marakoura, Enclosed Water; CMU8A – Te Tai o Marakoura, Open Water; and Specify the nautical boundary between these two CMUs. Amend Planning Map 16 accordingly. Extend Planning Map 16 to show the southern extent of Marlborough DC and the CMUs.
		46	PB PARTNERSHIP (WAINUI GREEN LIMITED & TWO MF LIMITED)	Bruce Cardwell	46.1	Support	Marine Farm 8167 a) Relocate to a bay with cool oceanic water equivalent to the existing space. b) Relocate to a bay in the Marlborough Sounds where there is existing marine farming, in line with the rest of my submission.
		76	Marlborough Aquaculture Limited	David Clark	76.3	Support	Support the mapping of AMAs in CMU 37 page 14 for Port Underwood
		102	McGuinness Institute	Wendy McGuinness	102.3	Oppose	Offshore CMU - •tThat the NZKS application for offshore aquaculture should be treated as simply another application in the Marlborough Sounds. It should not be treated separately, as it is within the 10 nautical miles and therefore forms part of the MDC area of management. Furthermore, landbased aquaculture, inshore aquaculture and offshore aquaculture operate together as one business model, therefore, in our view, their impacts cannot be assessed in isolation.

		102	McGuinness Institute	Wendy McGuinness	102.4	Oppose	That provisions are introduced to preclude any new marine finfish farms from being given a coastal permit in the inner and outer Queen Charlotte or Pelorus Sounds (with the view the existing Long Island - Kokomohua Marine Reserve be extended from west to east, connecting Ship Cove, Motuara Island bird sanctuary and Arapawa Island).
		86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.7	Neutral	Ability to establish a Matatitai Reserve at Anakoha, a traditional Mahinga Kai. CMU2
		92	Sanford Limited	Alison Undorf-Lay	92.37	Oppose	Move the farming into the AMA, which is a soft shape, so there is sufficient flexibility for anchors.
		92	Sanford Limited	Alison Undorf-Lay	92.38	Neutral	Replace the proposed AMA 'red' boundaries as depicted in Variation 1 and 1A maps with those 'yellow' boundaries attached to this submission, refer to Appendix 2. These amended maps 'yellow' boundaries were drawn up in consultation with Sanford and other marine farmers, and represent our best efforts in a constrained timeframe, further revision may be needed. Relief sought for Sanford farms, amend the AMA adjacent to our sites as proposed by the MFA-AQNZ alternative yellow line maps. As soon as possible and prior to the Plan becoming operative reconcile the relocation of backbone lines to ensure there is no loss. During the transitioning from 'existing' to 'within the AMA', amend the seaward and inshore lines of each AMA so that it is dotted, i.e. a soft, flexible yellow line. Following the confirmation of where the farm will be relocated to, fix the dotted line by moving it to a solid red line. Indicate where each farm will move from and to. Provide for reconciling, which is where backbone lines may be moved between sites over time to ensure that the overall, aggregated effect for each coastal permit holder is that their business is no worse off because of the proposed Plan. In spaces within AMAs where there won't be any farm structure, e.g. the ~50m gap between farms, use a softer shade of the AMA red. This will provide a visual signal to readers of the Plan that not all the AMA space is available to be farmed. Create a new AMA between Mary's Bay and Homeward Bay – where there is space for reconciling backbone length lost elsewhere. This is not about additional water space, but is for relocating backbone length.
		92	Sanford Limited	Alison Undorf-Lay	92.41	Neutral	Rezone areas around proposed salmon farm finfish sites as intensive aquaculture and provide for multispecies such as salmon and mussels.
		79	Minister of Conservation (the Minister) - Hon. Kiritapu Allan	Murray Brass	79.39	Oppose	Assess the new AMAs in Richmond Bay against the principles in Policy 13.21.3 and remove any AMAs that do not meet these principles unless the adverse effects associated with the AMAs are offset by the removal of farms elsewhere.
		68	Ministry for Primary Industries (MPI)	Michael Nielsen	68.47	Neutral	Ensure appropriate assessment of the new AMAs in Richmond Bay has occurred, including consultation with fishers.
CMU 1: Admiralty Bay	CMU item: CMU 1 Aquaculture Management Area - AMA 1	8	Simpson	Christine Simpson	8.4	Support	Variations 1 & 1A Support all provisions
	CMU item: CMU 1 Aquaculture Management Area - AMA 10	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.4	Support	Marine Farm 8022 Retain AMA as proposed.
	CMU item: CMU 1 Aquaculture Management Area - AMA 13	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.5	Neutral	Marine Farm 8025 Amend AMA to reflect the consented/installed space.
	CMU item: CMU 1 Aquaculture Management Area - AMA 14	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.14	Neutral	Marine Farm 8496 Amend the AMA consistent with the MFA/AQNZ submission map 036 'Island Bay – Admiralty Bay'.
		98	Kuku Holdings Limited	R D Sutherland	98.3	Support	Retain AMA as proposed. (Marine farm 8026)
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.33	Neutral	Wakatu/Kono seeks flexibility of relocating lines ( for Marine Farm 8036) within 20% of the AMA to provide for relocation of inshore lines to an offshore position under this scenario.	
	CMU item: CMU 1 Aquaculture Management Area - AMA 16	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.6	Neutral	Marine Farm 8028 Amend AMA to reflect consented/installed space.
	CMU item: CMU 1 Aquaculture Management Area - AMA 19	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.7	Neutral	Marine Farm 8031 Amend AMA to reflect consented/installed space.



CMU item: CMU 1 Aquaculture Management Area - AMA 2	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.1	Neutral	Marine Farm 8015 Amend AMA to include the consented and/or actual space, as per map 057 'Rerekarua Bay – Admiralty Bay' in MFA/AQNZ submission
CMU item: CMU 1 Aquaculture Management Area - AMA 21	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.8	Support	Marine Farm 8033 Retain AMA as proposed.
CMU item: CMU 1 Aquaculture Management Area - AMA 26	98	Kuku Holdings Limited	R D Sutherland	98.2	Neutral	Place the AMA around the existing installed/consented space, as per the MFA/AQNZ submission map 036 'Island Bay- Admiralty Bay'. (Farm 8038)
CMU item: CMU 1 Aquaculture Management Area - AMA 28	113	Talley's Group Limited	R D Sutherland	113.6	Support	Retain AMA as proposed. (Marine farm 8041)
CMU item: CMU 1 Aquaculture Management Area - AMA 29	113	Talley's Group Limited	R D Sutherland	113.7	Support	Retain AMA as proposed. (Marine farm 8041)
CMU item: CMU 1 Aquaculture Management Area - AMA 31	26	AJ KING FAMILY TRUST & SA KING FAMILY TRUST	Bruce Cardwell	26.1	Oppose	Marine Farm 8043 Place AMA 31 around the consented space
CMU item: CMU 1 Aquaculture Management Area - AMA 35	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.9	Neutral	Marine Farm 8045 Amend AMA to include the consented and/or actual space, as per map 041 'Matatoko Point – Admiralty Bay' in MFA/AQNZ submission.
CMU item: CMU 1 Aquaculture Management Area - AMA 36	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.15	Neutral	Marine Farm 8080 Draw the AMA as per the MFA/AQNZ submission map 017 'Danger Point – Port Ligar'.
CMU item: CMU 1 Aquaculture Management Area - AMA 37	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.10	Support	Marine Farm 8047 Retain AMA as proposed.
	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.11	Support	Marine Farm 8049 Retain AMA as proposed.
CMU item: CMU 1 Aquaculture Management Area - AMA 39	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.12	Support	Marine Farm 8051 Retain AMA as proposed.
CMU item: CMU 1 Aquaculture Management Area - AMA 41	44	LINDSAY AND JANE STUART	Bruce Cardwell	44.1	Support	Marine Farm 8053 Retain the AMA as mapped.
CMU item: CMU 1 Aquaculture Management Area - AMA 42	107	Ngāi Tahu Seafood	Thomas Hildebrand	107.3	Neutral	The AMA should be reconsidered and moved further offshore if required (Marine farm site 8054)
CMU item: CMU 1 Aquaculture Management Area - AMA 43	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.13	Support	Marine Farm 8055 Retain AMA as proposed.
CMU item: CMU 1 Aquaculture Management Area - AMA 5	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.2	Neutral	Marine Farm 8018 Amend AMA to include the consented and/or actual space, as per map 026 'Garden Bay – Admiralty Bay' in MFA/AQNZ submission.
CMU item: CMU 1 Aquaculture Management Area - AMA 6	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.3	Neutral	Marine Farm 8019 Amend AMA to include the consented and/or actual space, as per maps 026 'Garden Bay – Admiralty Bay' and 018 'Deep Bay – Admiralty Bay' in MFA/AQNZ submission.
CMU item: CMU 1 Aquaculture Management Area - AMA 7	76	Marlborough Aquaculture Limited	David Clark	76.4	Oppose	Farm 8056 Amend mapping of AMA in Deep Bay as set out in the attached amended plan.

	CMU item: CMU 1 Aquaculture Management Area - AMA 8	113	Talley's Group Limited	R D Sutherland	113.5	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 018 'Deep Bay-Admiralty Bay'; OR b) Retain AMA as proposed. (Marine farm 8020)
	CMU item: CMU 1 Aquaculture Management Area - New AMA	75	Clearwater Mussels Limited	R D Sutherland	75.9	Oppose	a) Include site 8057 within an AMA by creating an AMA around the consented space; OR b) Relocate to equivalent space with equivalent characteristics in an alternative bay in the Marlborough Sounds, in line with the rest of this submission
		58	Smith	Vincent Smith	58.1	Support	To understand how my marine farm 8040 in Admiralty Bay best fits into the new proposed AMA system. I do have more information I would like to add to my submission for 8040, further supporting material will follow for my submission on 8040.
CMU 2: Anakoha Bay	CMU item: CMU 2 Aquaculture Management Area - AMA 1	50	ROBERT AND SIMON POOLEY	Bruce Cardwell	50.5	Oppose	Marine Farm 8146 Draw the AMA as per the MFA/AQNZ submission (map ref 088, Anakoha Bay) (ie orientate it with adjoining farms and ensure backbone length is retained)
		28	BERYL ARCHER & JOHN HEBBERD	Bruce Cardwell	28.1	Oppose	Marine Farm 8149 Draw the AMA as per the MFA/AQNZ submission (ie place the AMA around the consented space); (Map ref 080, Anakoha Bay)
		26	AJ KING FAMILY TRUST & SA KING FAMILY TRUST	Bruce Cardwell	26.3	Oppose	a) Draw the AMA as per the MFA/AQNZ submission (map ref 088, Anakoha Bay) [Farm 8148]
		107	Ngāi Tahu Seafood	Thomas Hildebrand	107.4	Neutral	Either (in order of preference): 1. Redraw the proposed AMA to provide sufficient space for marine farm sites 8145 and 8146; 2. Ngāi Tahu Seafood is aware of the proposed mapping of Anakoha Bay undertaken by the Marine Farming Association as part of its submission. Provided the mapping is implemented in its entirety, this may provide a suitable amount of space for the two Ngāi Tahu Seafood sites; 3. Provide an AMA over the existing farm sites, and adjust the relevant policies through the variations to ensure it is possible to obtain consent.
	CMU item: CMU 2 Aquaculture Management Area - AMA 2	96	Beleve Limited, R J Davidson Family Trust, and Treble Tree Holdings Limited	R D Sutherland	96.5	Neutral	a) Retain AMA as proposed; OR b) Draw the AMA as per the MFA/ AQNZ submission map 088 'Anakoha Bay'; OR c) Place the AMA around the existing consented/installed site. (Marine farm 8153)
	CMU item: CMU 2 Aquaculture Management Area - New AMA	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.17	Oppose	Marine Farm 8161 a) Place an AMA around the consented and/or actual space; OR b) Include site 8161 within the AMA immediately to the north in Anakoha Bay as per the MFA/AQNZ submission map 088 'Anakoha Bay', provided there is satisfactory space for site 8161 as well as the other existing farms (sites 8163 and 8162). That might be achieved, for example, by the overlay shown in the MFA/AQNZ submission map 097 'Anakoha Bay – Proposed AMA and Backbone Overlay'
CMU 3: Beatrix Bay	CMU item: CMU 3 Aquaculture Management Area - AMA 10	75	Clearwater Mussels Limited	R D Sutherland	75.15	Neutral	Farm 8246 a) Draw the AMA as per the MFA/AQNZ submission maps 001 'Beatrix Bay Northeast - Pelorus Sound' and 002 'Beatrix Bay North - Pelorus Sound'; OR b) Include existing consented/installed space within an AMA.
	CMU item: CMU 3 Aquaculture Management Area - AMA 11	114	Slade	Darryl Slade	114.3	Oppose	The Decision I seek from the Council is keep AMAs 11, 12, 13. Separate as is currently in the Council Variation 1. Respect the area of the declined consent U990620. Make only slight tweaks to AMA 13 boundaries so its associated farms can fit into it. See submission for mapping and consent document.
	CMU item: CMU 3 Aquaculture Management Area - AMA 12	114	Slade	Darryl Slade	114.4	Oppose	The Decision I seek from the Council is keep AMAs 11, 12, 13. Separate as is currently in the Council Variation 1. Respect the area of the declined consent U990620. Make only slight tweaks to AMA 13 boundaries so its associated farms can fit into it. See submission for mapping and consent document.
	CMU item: CMU 3 Aquaculture Management Area - AMA 13	84	J & A SEGGIE FAMILY TRUST	Bruce Cardwell	84.2	Oppose	Marine Farm 8240 Draw the AMA as per the MFA/AQNZ submission; (map ref 002, Beatrix Bay North, Pelorus Sound);
		114	Slade	Darryl Slade	114.1	Oppose	The decision I seek from Council is that the AMA at Site 8242 be widened to seaward by approximately 2.4m at the western end and reduced by 4.2m. at the eastern end, this would result in the seaward boundary being parallel to the inshore boundary. Making the AMA the same width as the associated farm. There would seem to no impediment to this as there is ample room inside the 300m from shoreline. See map 2. Site 8242 would then fit within its adjacent AMA.

	114	Slade	Darryl Slade	114.2	Oppose	The Councils proposed AMA adjacent to Sanford site 8241 and 8579, (map 1) extends into the area declined under U990620. (map 4). It could be argued that the seaward shift of this farm to outside the 100m line at the proposed MDC AMA inshore boundary would have no additional sustainability impacts, than at its old position. Provided the farms dimensions and stocking rate remained unchanged. In fact, there are probably benefits to the inshore benthic ecosystems. But the Councils adjacent AMA is wider than the Farm. (see map 5 page 9) The western end of the AMA is 17 .-3m, and the eastern end is 17 .1 m wider than needed to accommodate the Sanford farm. (map 5 page 9) If this extra AMA space was to be farmed it would contravene the intent of the declined consent U990620. The decision I seek from the Council is that they respect the intent of their previous decision in U990620. In addition, The decision I seek from the Council is. Will the declined extension consent U990620 move to seaward with its attached farm?
	114	Slade	Darryl Slade	114.5	Oppose	The Decision I seek from the Council is keep AMAs 11, 12, 13. Separate as is currently in the Council Variation 1. Respect the area of the declined consent U990620. Make only slight tweaks to AMA 13 boundaries so its associated farms can fit into it. See submission for mapping and consent document.
CMU item: CMU 3 Aquaculture Management Area - AMA 14	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.20	Neutral	Marine Farm 8239 a) Draw the AMA as per the MFA/AQNZ submission maps 002 'Beatrix Bay North – Pelorus Sound' and 003 'Beatrix Bay Northwest – Pelorus Sound', subject to there being adequate space within the AMA to move inshore lines to outside of farm; OR b) Place the AMA around the consented and/or actual space.
CMU item: CMU 3 Aquaculture Management Area - AMA 15	74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.12	Support	Retain AMA as proposed. MF8235
CMU item: CMU 3 Aquaculture Management Area - AMA 16	113	Talley's Group Limited	R D Sutherland	113.19	Neutral	a) Draw the AMA as per the MFA/AQNZ submission maps 004 'Beatrix Bay Southwest - Pelorus Sound' and 037 'Kauauroa Bay- Pelorus Sound'; OR b) Amend AMA to reflect existing consented/installed space. - Marine farm 8228
	75	Clearwater Mussels Limited	R D Sutherland	75.14	Neutral	Farm 8229 'a) Draw the AMA as per the MFA/AQNZ submission maps 004 ' Beatrix Bay Southwest - Pelorus Sound' and 037 'Kauauroa Bay - Pelorus Sound'; OR b) Include existing consented/installed space within an AMA
CMU item: CMU 3 Aquaculture Management Area - AMA 2	26	AJ KING FAMILY TRUST & SA KING FAMILY TRUST	Bruce Cardwell	26.6	Neutral	Relocate 4 x 150m lines from our Hallam Cove farm 8188 to the seaward side of 8260 as per the map provided in Schedule 2 [Farm 8260]
CMU item: CMU 3 Aquaculture Management Area - AMA 3	96	Beleve Limited, R J Davidson Family Trust, and Treble Tree Holdings Limited	R D Sutherland	96.3	Support	Retain AMA as proposed. (Marine farm 8623)
CMU item: CMU 3 Aquaculture Management Area - AMA 6	113	Talley's Group Limited	R D Sutherland	113.20	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 038 'Laverique Bay- Beatrix Bay'; OR b) Amend AMA to reflect existing consented/installed space. (Marine farm 8253)
	113	Talley's Group Limited	R D Sutherland	113.32	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 038 'Laverique Bay- Beatrix Bay'; OR b) Retain AMA as proposed; OR c) Include the existing farm within an AMA. - Marine farm 8254
	107	Ngāi Tahu Seafood	Thomas Hildebrand	107.5	Neutral	Either (in order of preference): 1. Extend the proposed AMA seawards so that it provides equivalent space to the area covered by the current consents; or 2. Provide an AMA over the existing farm site, and adjust the relevant policies through the variations to ensure it is possible to obtain consent. (Marine farm site 8252)
	107	Ngāi Tahu Seafood	Thomas Hildebrand	107.8	Support	Confirm the proposed AMA.
	74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.22	Support	a) Draw the AMA as per the MFA/AQNZ submission map '020 Fish Bay West – Kenepuru Sound'; OR b) Draw an AMA around site 8646 as currently installed/consented. MF 8250
CMU item: CMU 3 Aquaculture Management Area - AMA 7	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.37	Oppose	AMA (for marine farm 8249) to be expanded to west and re-orientated as shown on Map 4 attached to the submission. This is to allow for deletion of recommended inshore exclusion area for ecological reasons.
CMU item: CMU 3 Aquaculture Management Area - Finfish AMA 5	107	Ngāi Tahu Seafood	Thomas Hildebrand	107.7	Support	Confirm the proposed AMA.

CMU 4: Catherine Cove	CMU item: CMU 4 Aquaculture Management Area - AMA1	113	Talley's Group Limited	R D Sutherland	113.3	Neutral	a) Draw the AMA as per the MFA/ AQNZ submission map 010 'Catherine Cove - D'Urville Island'; OR b) Retain AMA as proposed. (Marine farm 8007)
	CMU item: CMU 4 Aquaculture Management Area - AMA2	113	Talley's Group Limited	R D Sutherland	113.49	Neutral	a) Draw the AMA as per the MFA/ AQNZ submission map 010 'Catherine Cove - D'Urville Island'; OR b) Retain AMA as proposed. (Marine farm 8007)
	CMU item: CMU 4 Aquaculture Management Area - AMA3	97	Kapua Marine Farms Limited	R D Sutherland	97.2	Support	Retain the AMA as proposed. (Marine farm 8008)
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.19	Support	Retain AMA as proposed. MF 8631
	CMU item: CMU 4 Aquaculture Management Area - AMA4	74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.20	Neutral	Amend AMAs to broadly reflect location of existing farms. Oppose the creation of AMA 4 in space next door north of site 8631, which will effect tidal flow to site 8631.
	CMU item: CMU 4 Aquaculture Management Area - AMA5	113	Talley's Group Limited	R D Sutherland	113.2	Support	Retain the AMA as proposed (Marine farm 8006)
	CMU item: CMU 4 Aquaculture Management Area - AMA6	97	Kapua Marine Farms Limited	R D Sutherland	97.1	Neutral	Amend the AMA as shown on map 010 'Catherine Cove - D'Urville Island' in the MFA/AQNZ submission. (Marine farm 8005)
	CMU item: CMU 4 Aquaculture Management Area - AMA7	103	McCarthy	S.G.T McCarthy	103.1	Neutral	(a) Draw the AMA as per the MFA/AQNZ submission map 010 'Catherine Cove - D'Urville Island'; OR (b) Retain AMA as proposed. (Marine Farm 8004)
	CMU item: CMU 4 Aquaculture Management Area - AMA8	113	Talley's Group Limited	R D Sutherland	113.1	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 010 'Catherine Cove - D'Urville Island'; OR b) Retain the AMA as proposed. (Marine farm 8003)
	CMU item: CMU 4 Aquaculture Management Area - New AMA	69	Elkington	Carl Elkington	69.1	Oppose	Opposes no AMA being provided at the site for MPE299/U110015 and to support the current location of MPE299/U110015.
104		Elkington and McCarthy	T.R. Elkington and S.G.T. McCarthy Elkington and McCarthy	104.1	Oppose	a) Draw the AMA as per the attached map 'Marine Farm 8002 -Cherry Tree Bay' dated 25 February 2021, relocating marine farm 8002 slightly offshore of its existing location within Cherry Tree Bay; OR b) Amend the mapping of the AMA to include an AMA around the installed/consented site 8002; OR c) Relocate site 8002 to equivalent space in an alternative bay in the Marlborough Sounds.	
CMU 6: Clova Bay	CMU item: CMU 6 Aquaculture Management Area - AMA 1	91	Kenepuru & Central Sounds Residents Association Incorporated	Andrew Caddie	91.8	Neutral	We submit that there are significant environmental issues with any aquaculture activity within what is currently the Coastal Marine Zone 1 at the head of Clova Bay, including Site 8553. As such, the proposed AMA over Site 8553 should be removed from V1.
		90	Clova Bay Residents Association Incorporated	Trevor Offen	90.1	Oppose	We submit that there are significant environmental issues with any aquaculture activity within what is currently the Coastal Marine Zone 1 at the head of Clova Bay, including Site 8553. As such, the proposed AMA over Site 8553 should be removed from V1.
	CMU item: CMU 6 Aquaculture Management Area - AMA 2	25	Hogg	David Hogg	25.1	Neutral	Either: a) Draw the AMA as per the MFA/AQNZ submission (Indicative Map ref 012, Clova Bay West, Pelorus Sound); OR b) Retain the AMA as proposed; OR c) Draw an AMA around marine farm 8551 as installed/consented.
		113	Talley's Group Limited	R D Sutherland	113.30	Neutral	Draw the AMA as per the MFA/AQNZ submission map 012 'Clova Bay West -Pelorus Sound'. (Marine farm 8552)
		75	Clearwater Mussels Limited	R D Sutherland	75.24	Neutral	Farm 8549 a) Draw the AMA as per the MFA/AQNZ submission map 012 ' Clova Bay West - Pelorus Sound'; OR b) Retain AMA as proposed; OR c) Include existing farm within an AMA.
CMU item: CMU 6 Aquaculture Management Area - AMA 3	25	Hogg	David Hogg	25.2	Neutral	Either: a) Draw the AMA as per the MFA/AQNZ submission (Map ref 051, Clova Bay West, Pelorus Sound); OR b) Retain the AMA as proposed; [Farm 8560]	

		113	Talley's Group Limited	R D Sutherland	113.31	Neutral	Draw the AMA as per the MFA/AQNZ submission maps 012 'Clova Bay West - Pelorus Sound' and 011 'Clova Bay East - Pelorus Sound'. (Marine farm 8557)
		61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.34	Oppose	Realign AMA boundaries in accordance with Map 1 provided with submission for marine farm 8556.
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.23	Support	Retain AMA as proposed. MF 8560
	CMU item: CMU 6 Aquaculture Management Area - AMA 4	107	Ngāi Tahu Seafood	Thomas Hildebrand	107.6	Neutral	Either (in order of preference): 1. Extend the proposed AMA seawards so that it provides equivalent space to the area covered by the current consents; or 2. Provide an AMA over the existing farm site, and adjust the relevant policies through the variations to ensure it is possible to obtain consent. Marine farm site 8265
		96	Beleve Limited, R J Davidson Family Trust, and Treble Tree Holdings Limited	R D Sutherland	96.4	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 075 'Te Puraka - Pelorus Sound'; OR b) Retain the AMA as proposed; OR c) Place the AMA around the installed space. (Marine farm 8263)
CMU 10: Coastal Section - South of French Pass	CMU item: CMU 10 Aquaculture Management Area - AMA 1	75	Clearwater Mussels Limited	R D Sutherland	75.8	Support	Farm 8009 a) Amend the AMA to include northeast corner of existing farm as per recently re-consented space; OR b) Retain AMA as proposed
	CMU item: CMU 10 Aquaculture Management Area - AMA 4	51	Anstis	Scott Anstis	51.1	Oppose	Two options presented for relief sought: (a) Place the AMA around the newly consented space as per the map in Schedule 2; OR (b) Draw the AMA as per the MFA/AQNZ submission (map ref 080 – Waikawa Bay – Current Basin)
CMU 11: Crail Bay	CMU item: CMU 11 Aquaculture Management Area - AMA 1	92	Sanford Limited	Alison Undorf-Lay	92.44	Neutral	Relocate Crail Bay Site 8539 by adding one line width to the Sanford farms on the other side of the Bay and widening that AMA accordingly.
	CMU item: CMU 11 Aquaculture Management Area - AMA 10	96	Beleve Limited, R J Davidson Family Trust, and Treble Tree Holdings Limited	R D Sutherland	96.1	Neutral	Amend the AMA to reflect space re- consented in 2020, as shown on 082 map 'Wet Inlet - Crail Bay' attached to the MFA/AQNZ submission. (Marine farm 8531)
	CMU item: CMU 11 Aquaculture Management Area - AMA 12	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.27	Support	Marine Farm 8533 Retain AMA as proposed.
	CMU item: CMU 11 Aquaculture Management Area - AMA 13	19	Bunting	Brian & Nanette Bunting	19.1	Oppose	Farm 8518 Two options presented for relief sought: (a) Place the AMA around the newly consented space; OR (b) Draw the AMA as per the MFA/AQNZ submission (Map ref 013, Crail Bay Central, Crail Bay)
	CMU item: CMU 11 Aquaculture Management Area - AMA 18	26	AJ KING FAMILY TRUST & SA KING FAMILY TRUST	Bruce Cardwell	26.8	Support	Retain the AMA as proposed (Inferred) [8544]
		43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.28	Neutral	Marine Farm 8541 a) Draw the AMA as per the MFA/AQNZ submission maps 029 'Grant Bay – Crail Bay'; OR OR b) Place the AMA around the consented and/or actual space.
	CMU item: CMU 11 Aquaculture Management Area - AMA 20	113	Talley's Group Limited	R D Sutherland	113.29	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 029 'Grant Bay- Crail Bay'; OR b) Amend AMA to reflect existing consented/installed space - marine farm 8546
	CMU item: CMU 11 Aquaculture Management Area - AMA 5	113	Talley's Group Limited	R D Sutherland	113.42	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 013 'Crail Bay Central - Crail Bay'; OR OR b) Amend AMA to reflect consented/installed space. (Marine farm 8516)
CMU item: CMU 11 Aquaculture Management Area - AMA 9	78	Hughes	Ciaran Hughes	78.3	Neutral	Retain the AMA over the existing farm 8530 (AMA9) but adjust the boundary as shown on the plan annexed as 'C'.	
	40	Tester	Jonathon Tester	40.3	Neutral	Map 9 - retain the AMA over the existing farm 8530 (AMA9) but adjust the boundary as shown on the plan annexed as 'C'.	

CMU 13: D'Urville Island	CMU item: CMU 13 Aquaculture Management Area - New AMA	20	Rene	Poneke Rene	20.1	Neutral	Variation 1 & 1A (1) The potential to create new marine farms/AMAs within CMU13 not be allowed. (2) The relocation of existing marine farms to CMU 13 not be allowed. (3) Where new space is to be created for marine farming, it should be allocated to locals rather than used for export purposes.  (Inferred)
		113	Talley's Group Limited	R D Sutherland	113.4	Oppose	a) Relocate to equivalent space in an alternative bay, such as Outer Admiralty Bay or Okuri Bay, in line with the rest of this submission; OR b) Include site 8013 within an AMA, by creating an AMA around the consented space; OR c) Relocate to equivalent space in an alternative bay in the Marlborough Sounds, consistent with remainder of submission. (Marine farm 8013)
CMU 14: East Bay QCS	CMU item: CMU 14 Aquaculture Management Area - AMA 1	37	BURNS	FRANK BURNS	37.3	Support	Retain the AMA for marine farm 8580 as proposed. (Inferred)
	CMU item: CMU 14 Aquaculture Management Area - AMA 4	75	Clearwater Mussels Limited	R D Sutherland	75.21	Neutral	Farm 8398 Draw the AMA as per the MFA/AQNZ submission map 050 'Otanerau Bay - East Bay'.
	CMU item: CMU 14 Aquaculture Management Area - AMA 5	113	Talley's Group Limited	R D Sutherland	113.47	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 050 'Otanerau Bay- East Bay'; OR b) Retain AMA as proposed; OR c) Draw an AMA around site as installed/ consented. (Marine farm 8399)
	CMU item: CMU 14 Aquaculture Management Area - AMA 6	37	BURNS	FRANK BURNS	37.2	Support	Retain the AMA for marine farm 8400 as proposed. (Inferred)
	CMU item: CMU 14 Aquaculture Management Area - AMA 7	75	Clearwater Mussels Limited	R D Sutherland	75.7	Neutral	Farm 8401 a) Retain AMA as proposed; OR b) include existing farm within an AMA
	CMU item: CMU 14 Aquaculture Management Area - AMA 8	87	Red Sky Trust	Kevin Oldham	87.1	Neutral	a) Adopt AMA 8, shown in attached Plan A and the line layout shown in attached Plan B; OR b) Adopt alternative boundaries to provide for AMA 8 of area 8 ha and practical lines arrangement within the envelope shown in attached Plan C, with the adopted AMA area not larger than the AMA area shown in Variation 1; OR c) Adopt the AMA as proposed in Variation 1. (Marine farm 8402)
	CMU item: CMU 14 Aquaculture Management Area - AMA 9	24	Marlborough District Council	Louise Walker	24.25	Support	On the northern side of Easy Bay (Onauku Bay), the area of AMA 9 i that overlaps with ESMS 4.24 be removed as an aquaculture management area.
CMU 16: Fitzroy Bay	CMU item: CMU 16 Aquaculture Management Area - AMA 5	37	BURNS	FRANK BURNS	37.1	Support	Retain the AMA for marine farm 8510 as proposed. (Inferred)
		24	Marlborough District Council	Louise Walker	24.21	Support	Remove the section of AMA 5, CMU 16 that overlaps with ESMS 3.8.
CMU 17: Forsyth Bay	CMU item: CMU 16 Aquaculture Management Area - AMA 7	26	AJ KING FAMILY TRUST & SA KING FAMILY TRUST	Bruce Cardwell	26.9	Support	Retain the AMA as proposed (Inferred) [Farm 8573]
	CMU item: CMU 17 Aquaculture Management Area - AMA 15	113	Talley's Group Limited	R D Sutherland	113.13	Support	Retain AMA as proposed. (Marine farm 8123)
CMU 17: Forsyth Bay	CMU item: CMU 17 Aquaculture Management Area - AMA 20	14	James Maurice Goulding	Jim Goulding & Julian Goulding	14.1	Support	To place the AMA around the consented and/or actual space as per MDC notified plan.
	CMU item: CMU 17 Aquaculture Management Area - AMA 21	74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.6	Support	Retain AMA as proposed. MF 8129

	CMU item: CMU 17 Aquaculture Management Area - AMA 22	26	AJ KING FAMILY TRUST & SA KING FAMILY TRUST	Bruce Cardwell	26.2	Support	Retain the proposed AMA (Inferred) [farm 8130]
	CMU item: CMU 17 Aquaculture Management Area - AMA 23	38	GARY BROWN AND NANETTE BUCHANAN-BROWN	Bruce Cardwell	38.1	Support	Retain the AMA as mapped (marine farm 8131)
	CMU item: CMU 17 Aquaculture Management Area - AMA 24	36	JONES	DAVID JONES	36.1	Oppose	Draw the AMA as per the MFA/AQNZ submission (ie place the AMA around the newly consented space for marine farm 8132); (Map ref 083, Whakatahuri Bay, Forsyth Bay)
	CMU item: CMU 17 Aquaculture Management Area - AMA 29	75	Clearwater Mussels Limited	R D Sutherland	75.11	Support	Farm 8137 Retain AMA as proposed.
	CMU item: CMU 17 Aquaculture Management Area - AMA 34	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.16	Support	Marine Farm 8142 Retain AMA as proposed.
	CMU item: CMU 17 Aquaculture Management Area - AMA 5	113	Talley's Group Limited	R D Sutherland	113.12	Support	Retain AMA as proposed. (Marine farm 8113)
	CMU item: CMU 17 Aquaculture Management Area - AMA 6	112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.9	Support	Retain AMA as proposed. (Marine farm 8114)
	CMU item: CMU 17 Aquaculture Management Area - New AMA	87	Red Sky Trust	Kevin Oldham	87.2	Oppose	a) Place an AMA over the consented space as per attached Plan D; OR b) Relocate to Richmond Bay (CMU 44), where Variation 1 proposes AMA 7, with proposed AMA 7 enlarged as per attached Plan G to provide a similar total length of crop rope to Marine Farm 8572 in a high-flow area ; OR c) Relocate to Catherine Cove (CMU 4) where Variation 1 proposes AMA 4 in a doubleparked arrangement, with the proposed AMA 4 enlarged to 10.475 ha (being similar in area as Marine Farm 8572) as per attached Plan F; OR d) Relocate farm to AMA 11 at the head of Waihinau Bay in the Waitata Reach (CMU 44), with the proposed AMA 11 enlarged as per attached Plan E; AND e) If a reduction arises in total backbone metres or marine farm area permitted under Variation 1 for marine farming by RED SKY TRUST then a partial transfer of lines to AMA 8 (CMU 14, Map 11) is permitted. The transfer may be up to 5 additional backbone lines and backbone extensions on other lines, cumulatively adding up to 1,500 relocated backbone metres to existing site 8402. All line changes arising from such transfers are to fit within the envelope shown in attached Plan C.
CMU 19: Guards Bay	CMU item: CMU 19 Aquaculture Management Area - New AMA	49	PHR Processing Limited	Quentin Davies and Kerry Moor	49.1	Oppose	a) An AMA be placed around the consented space of site 8164, that increases the site area two-fold (to reflect its importance to the industry); OR b) An AMA be placed around the current installed/consented space; OR c) The farm be relocated to a remote bay in the outer Marlborough Sounds that is a suitable alternative, i.e. that provides for similar characteristics/type of water space as the existing Guards Bay site, such as Waitui Bay; OR d) The farm be relocated to a bay in the Marlborough Sounds that is a suitable alternative for the site where there is existing marine farming in line with the rest of this submission.
		48	PH Redwood & Company Limited	Quentin Davies and Kerry Moor	48.1	Oppose	a) An AMA be placed around the consented space [Farm 8164] that increases the site area two-fold (to reflect its importance to the industry); OR b) An AMA be placed around the installed/consented space; OR c) The farm be relocated to a remote bay in the outer Marlborough Sounds that is a suitable alternative, i.e. that provides for similar characteristics/type of water space as the existing Guards Bay site, such as Waitui Bay; OR d) The farm be relocated to a bay in the Marlborough Sounds that is a suitable alternative for the site where there is existing marine farming in line with the rest of this submission.
CMU 20: Hallam Cove	CMU item: CMU 20 Aquaculture Management Area - AMA 1	50	ROBERT AND SIMON POOLEY	Bruce Cardwell	50.4	Oppose	Marine Farm 8186 Draw the AMA as per the MFA/AQNZ submission (map ref 061, Sheep Point, Hallam Cove) (ie better incorporate the existing structures)
	CMU item: CMU 20 Aquaculture Management Area - AMA 2	113	Talley's Group Limited	R D Sutherland	113.15	Support	Retain AMA as proposed (Marine farm 8191)

	CMU item: CMU 20 Aquaculture Management Area - AMA 3	113	Talley's Group Limited	R D Sutherland	113.16	Neutral	Amend AMA to reflect existing consented/installed space. - Marine farm 8192
	CMU item: CMU 20 Aquaculture Management Area - New AMA	35	DAVID MUIR MCLAREN & LENORE MARY MCLAREN	Bruce Cardwell	35.5	Oppose	Relocate the 6 x 150m lines to the following farms: 4 x 100m lines to our Port Ligar farm 8065 (AMA 3, CMU 36, Map 4) and 2 x 100m lines to our Port Ligar farm 8074 (AMA 11, CMU 36, Map 5); OR  Place an AMA over the existing site and retain 8188 as consented.
		26	AJ KING FAMILY TRUST & SA KING FAMILY TRUST	Bruce Cardwell	26.4	Oppose	a) Relocate 4 x 150m lines to our Beatrix Bay farm 8260 (AMA2, CMU 3, Map 9, Volume 4); OR b) If relocation to 8260 is not possible then relocate 4 x 150m lines to our Richmond Bay farm 8204 (AMA 6, CMU 44, Map 4, Volume 4); OR c) Place an AMA over the existing site and retain 8188 as consented. [Farm 8188]
CMU 21: Hikapu Reach	CMU item: CMU 21 Aquaculture Management Area - AMA 1	99	Ngati Rarua Atiawa Trust Board	R D Sutherland	99.1	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 033 'Hikapu Reach -Pelorus Sound'; OR b) Retain AMA as proposed; OR c) Place the AMA around the installed/consented farm. (Marine farm 8570)
		61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.41	Oppose	AMA amended so it is expanded offshore from the farm, for ecological reasons, as shown in Map 8 attached.
		75	Clearwater Mussels Limited	R D Sutherland	75.20	Neutral	Farm 8393 a) Draw the AMA as per the MFA/AQNZ submission map 033 ' Hikapu Reach - Peorus OSund'; OR b) Retain AMA as proposed.
CMU 22: Inner Pelorus Sound	CMU item: CMU 22 Aquaculture Management Area - AMA 10	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.24	Neutral	Marine Farm 8336 a) Draw the AMA as per the MFA/AQNZ submission map 064 'South East Bay South – Pelorus Sound', as well as allowing for additional space on the outside of the farm to enable inshore lines to be moved; OR b) Place the AMA around the consented and/or actual space.
		75	Clearwater Mussels Limited	R D Sutherland	75.17	Support	Farm 8335 Amend AMA to reflect consented/installed space.
	CMU item: CMU 22 Aquaculture Management Area - AMA 11	58	Smith	Vincent Smith	58.2	Support	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.
	CMU item: CMU 22 Aquaculture Management Area - AMA 12	52	Scott Madsen Family Trust	Scott Madsen	52.1	Oppose	Farm 8333 Amend the mapping of the proposed AMA in CMU 22 so that it aligns with existing marine farm 8333. Alternatively, if that is not possible then amend the proposed AMA to enable the existing marine farm 8333 to be moved and accommodated within the proposed AMA as shown on the attached plan.
		76	Marlborough Aquaculture Limited	David Clark	76.6	Oppose	Amend mapping of CMU 22 at South East Bay alternatively to align with the existing marine farm (8333) or to align the proposed AMA in accordance with the layout of the existing lines in accordance with the attached plan.
		43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.23	Neutral	Marine Farm 8332 a) Draw the AMA as per the MFA/AQNZ submission map 063 'South East Bay North – Pelorus Sound'; OR b) Place the AMA around the consented and/or actual space.
	CMU item: CMU 22 Aquaculture Management Area - AMA 14	75	Clearwater Mussels Limited	R D Sutherland	75.16	Support	Retain AMA as proposed
	CMU item: CMU 22 Aquaculture Management Area - AMA 15	24	Marlborough District Council	Louise Walker	24.19	Support	AMA 15 be reduced to match the current consented boundary of the marine farm (8328) at this site. An attachment has been provided to show the farm. Council seeks the AMA (shown in red) is reduced to match the granted area (shown in blue).
		112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.7	Support	Retain AMA as proposed, provided this provides for sufficient room for the inside lines to remain within the AMA. (Marine farm 8328)
	CMU item: CMU 22 Aquaculture Management Area - AMA 16	74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.11	Support	Farm 8350 Retain AMA as proposed.



CMU item: CMU 22 Aquaculture Management Area - AMA 2	75	Clearwater Mussels Limited	R D Sutherland	75.5	Neutral	Farm 8371 a) Include existing farm within AMA; OR b) Draw the AMA as per the MFA/AQNZ submission map 039 'Maori Bay - Pelorus Sound'; OR c) Retain AMA as proposed
CMU item: CMU 22 Aquaculture Management Area - AMA 21	50	ROBERT AND SIMON POOLEY	Bruce Cardwell	50.1	Oppose	Marine Farm 8321 Draw the AMA as per the MFA/AQNZ submission (map ref 086, Wilson Bay, Pelorus Sound) (ie place the AMA around the consented space);
CMU item: CMU 22 Aquaculture Management Area - AMA 3	113	Talley's Group Limited	R D Sutherland	113.26	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 039 'Maori Bay- Pelorus Sound'; OR b) Retain AMA as proposed; OR c) Amend AMA to reflect existing consented/installed space.(Marine farm 8375)
CMU item: CMU 22 Aquaculture Management Area - AMA 4	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.40	Oppose	AMA (for marine farm 8386) be amended to incorporate minor area in south-east corner as shown on Map 7 attached to submission.
	74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.9	Neutral	Draw the AMA as per the MFA/AQNZ submission maps 045 'Nikau Bay – Pelorus Sound', and 099 'Nikau Bay – Proposed AMA and Backbone Overlay. MF 8387
CMU item: CMU 22 Aquaculture Management Area - AMA 5	112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.8	Support	a) Draw the AMA as per the MFA/AQNZ submission map 045 'Nikau Bay – Pelorus Sound', provided total backbone length is retained, as shown on MFA/AQNZ submission map 099 'Nikau Bay – Proposed AMA and Backbone Overlay'; OR b) Place the AMA around the consented and/or actual space [Farm 8382]
CMU item: CMU 22 Aquaculture Management Area - AMA 6	39	Chance Bay Marine Farms Limited	Colleen Buchanan	39.1	Neutral	To adopt the modified AMA design proposed by the Marine Farming Association for Four Fathom Bay (yellow lines - see document attached to submission. (Marine farm 8379)
	76	Marlborough Aquaculture Limited	David Clark	76.8	Oppose	Amend mapping of CMU 22 at Four Fathom Bay so that the AMA aligns with the existing marine farm 8376 or alternatively so that the proposed AMA aligns with the existing layout of the lines in accordance with the attached plan.
CMU item: CMU 22 Aquaculture Management Area - AMA 7	38	GARY BROWN AND NANETTE BUCHANAN-BROWN	Bruce Cardwell	38.2	Neutral	Draw the AMA as per the MFA/AQNZ submission (ie place the inshore line of the AMA in line with the current consent boundary for marine farm 8343). (map ref 087, Yncyca Bay, Pelorus Sound)
	113	Talley's Group Limited	R D Sutherland	113.33	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 087 'Yncyca Bay- Pelorus Sound'; OR b) Include existing farm within an AMA. - Marine farm 8345
	75	Clearwater Mussels Limited	R D Sutherland	75.18	Neutral	Farm 8342 Amend AMA to reflect consented/installed space.
CMU item: CMU 22 Aquaculture Management Area - AMA 8	30	CANANTOR MUSSELS LIMITED	Q A M Davies, A L Hills and E L Deason	30.1	Oppose	(a) Include existing marine farm site 8326 within an AMA, by creating an AMA around the consented and/or actual space; OR (b) Relocate site 8326 to space in Richmond Bay as indicated in yellow on the map prepared in 2017, attached to this submission; OR (c) Relocate to equivalent space in an alternative bay in the Marlborough Sounds where there is existing marine farming, in line with the rest of the submission.
	113	Talley's Group Limited	R D Sutherland	113.24	Neutral	a) Amend AMA to reflect consented/installed space (marine farm 8339); OR b) Draw the AMA as per the MFA/AQNZ submission map 064 'South East Bay South - Pelorus Sound'; OR c) Retain AMA as proposed.  Farm 8339
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.39	Oppose	AMA (for marine farm 8340) to be expanded in offshore area but equivalent cross hatched areas to be deleted, for ecological reasons, in accordance with Map 6 attached to submission.
CMU item: CMU 22 Aquaculture Management Area - AMA 9	26	AJ KING FAMILY TRUST & SA KING FAMILY TRUST	Bruce Cardwell	26.7	Support	Retain the AMA as proposed. (inferred) [Famr 8338]
CMU item: CMU 22 Aquaculture Management Area - New AMA	63	Parkhurst Enterprises Ltd	Jim Jessep	63.1	Oppose	Make the three farms, 8327, 8326, and 8325, in Fairy Bay into an AMA.
	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.22	Oppose	Marine Farm 8325 a) Include site 8325 within an AMA, by creating an AMA around the consented and/or actual space; OR b) Relocate site 8325 to space in Richmond Bay, as indicated in yellow on the map prepared in 2017, attached to this submission; OR c) Relocate to equivalent space in an alternative bay in the Marlborough Sounds where there is existing marine farming, in line with the rest of this submission.
	74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.10	Oppose	Include site 8327 within an AMA, by creating an AMA around the consented/ installed space.

CMU 24: Kaiuma Bay	CMU item: CMU 24 Aquaculture Management Area - AMA 1	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.25	Support	Marine Farm 8477 Retain AMA as proposed.
CMU 25: Kenepuru Sound	CMU item: CMU 25 Aquaculture Management Area - AMA 1	64	Juniper Trust	Anna Jocelyn Greig	64.1	Support	I seek the Marlborough District Council to make the decisions set out in Variation 1. Where changes are proposed, further consequential amendments may be required. Alternative relief securing the same outcomes could be granted.
		38	GARY BROWN AND NANETTE BUCHANAN-BROWN	Bruce Cardwell	38.3	Support	Retain the AMA as mapped (Marine Farm 8465)
		113	Talley's Group Limited	R D Sutherland	113.28	Neutral	Draw the AMA as per the MFA/AQNZ submission map 059 'Scotts Bay-Kenepuru Sound'. (Marine farm 8466)
	CMU item: CMU 25 Aquaculture Management Area - AMA 10	74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.21	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map '020 Fish Bay West – Kenepuru Sound'; OR b) Draw an AMA around site 8646 as currently installed/consented.
	CMU item: CMU 25 Aquaculture Management Area - AMA 11	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.29	Oppose	Marine Farm 8563 a) Draw the AMA as per the MFA/AQNZ submission map 021 'Fish Bay East – Kenepuru Sound'; OR b) Relocate to equivalent space in a bay in the Marlborough Sounds where there is existing marine farming, in line with the rest of this submission.
		43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.30	Neutral	Marine Farm 8566 a) Draw the AMA as per the MFA/AQNZ submission 021 'Fish Bay East – Kenepuru Sound'; OR b) Place the AMA around the consented and/or actual space.
	CMU item: CMU 25 Aquaculture Management Area - AMA 4	75	Clearwater Mussels Limited	R D Sutherland	75.22	Neutral	Farm 8462 a) Draw the AMA as per the MFA/AQNZ submission map 062 'Skiddaw - Kenepuru Sound'; OR b) Retain AMA as proposed; OR c) Include existing farm within an AMA.
	CMU item: CMU 25 Aquaculture Management Area - AMA 5	84	J & A SEGGIE FAMILY TRUST	Bruce Cardwell	84.3	Oppose	Marine Farm 8472 Draw the AMA as per the MFA/AQNZ submission; (map ref 058, Schnapper Point, Kenepuru Sound)
		84	J & A SEGGIE FAMILY TRUST	Bruce Cardwell	84.4	Oppose	Marine Farm 8471 a) Place the AMA around the existing consented space; OR b) Draw the AMA as per the MFA/AQNZ submission; (map ref 058, Schnapper Point, Kenepuru Sound)
		75	Clearwater Mussels Limited	R D Sutherland	75.4	Neutral	Farm 8470 a) Draw the AMA as per MFA/AQNZ submission map 058 'Schnapper Point - Kenepuru Sound'; OR b) include existing farm within AMA
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.7	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map '058 Schnapper Point – Kenepuru Sound'; OR b) Retain AMA as proposed; OR c) Draw an AMA around site 8471 as consented/ installed.
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.8	Neutral	Farm 8473: a) Draw the AMA as per the MFA/AQNZ submission map '058 Schnapper Point – Kenepuru Sound'; OR b) Retain AMA as proposed; OR c) Draw an AMA around site 8473 as consented/ installed.
		CMU item: CMU 25 Aquaculture Management Area - AMA 6	113	Talley's Group Limited	R D Sutherland	113.43	Neutral
	74		Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.4	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map '043 Mills Bay – Kenepuru Sound'; OR b) Draw an AMA around site 8480 as installed/ consented.
	CMU item: CMU 25 Aquaculture Management Area - AMA 7	75	Clearwater Mussels Limited	R D Sutherland	75.1	Support	a) Retain AMA as proposed; OR b) Draw the AMA as per MFA/AQNZ submission map 028 'Goulter Bay - Kenepuru Sound'. MF 8482
75		Clearwater Mussels Limited	R D Sutherland	75.2	Neutral	Farm 8484 Draw the AMA as per MFA/AQNZ submission map 028 'Goulter Bay - Kenepuru Sound'.	
CMU item: CMU 25 Aquaculture Management Area - AMA 8	45	MICHAEL AND ANNA RICHARDS	Bruce Cardwell	45.1	Oppose	Marine Farm 8488 Draw the AMA as per the MFA/AQNZ submission (map ref 028, Goulter Bay, Kenepuru Sound)	
	74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.5	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map '028 Goulter Bay – Kenepuru Sound'; OR b) Retain AMA as proposed. MF 8485	

	CMU item: CMU 25 Aquaculture Management Area - AMA 9	45	MICHAEL AND ANNA RICHARDS	Bruce Cardwell	45.2	Support	Marine Farm 8491 Retain AMA as proposed [Inferred]
		75	Clearwater Mussels Limited	R D Sutherland	75.3	Support	Farm 8490 Retain AMA as proposed
		75	Clearwater Mussels Limited	R D Sutherland	75.23	Neutral	Farm 8489 a) Draw the AMA as per the MFA/AQNZ submission maps 028 'Goulter Bay - Kenepuru Suund' and 081 'Waitaria Bay - Kenepuru Sound'; OR b) Retain AMA as proposed; OR c) Include existing farm within an AMA.
	CMU item: CMU 25 Aquaculture Management Area - New AMA	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.26	Oppose	Marine Farm 8492 a) Relocate to equivalent space in a bay in the Marlborough Sounds where there is existing marine farming, in line with the rest of this submission; AND/OR b) Relocate individual backbones or backbone metres to existing KPF farms; OR c) Include the existing installed/consented space within an AMA.
CMU 28: Maud Island	CMU item: CMU 28 Aquaculture Management Area - AMA 1	50	ROBERT AND SIMON POOLEY	Bruce Cardwell	50.3	Support	Marine Farm 8203 Retain AMA as proposed [Inferred]
		113	Talley's Group Limited	R D Sutherland	113.17	Support	Retain AMA as proposed (Marine farm 8202)
	CMU item: CMU 28 Aquaculture Management Area - AMA 10	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.21	Neutral	Marine Farm 8316 a) Draw the AMA as per the MFA/AQNZ submission map 054 'Rams Head East – Tawhitinui Reach', subject to there being adequate space within the AMA to move inshore lines to outside of farm. In addition, any move would need to occur in conjunction with adjoining farms; OR b) Place the AMA around the consented and/or actual space.
		113	Talley's Group Limited	R D Sutherland	113.22	Neutral	Draw the AMA as per the MFA/AQNZ submission map 054 'Rams Head East -Tawhitinui Reach'; OR Amend AMA to reflect existing consented/installed space - Marine farm 8317
	CMU item: CMU 28 Aquaculture Management Area - AMA 13	84	J & A SEGGIE FAMILY TRUST	Bruce Cardwell	84.1	Oppose	Marine Farm 8223 a) Draw the AMA as per the MFA/AQNZ submission (map ref 037, Kauauroa Bay, Pelorus Sound); OR b) Place the AMA around the recently re-consented space
		43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.19	Neutral	Marine Farm 8225 a) Draw the AMA as per the MFA/AQNZ submission map 037 'Kauauroa Bay – Pelorus Sound', subject to there being adequate space within the AMA to move inshore lines to outside of farm; OR b) Place the AMA around the consented and/or actual space.
	CMU item: CMU 28 Aquaculture Management Area - AMA 14	50	ROBERT AND SIMON POOLEY	Bruce Cardwell	50.2	Oppose	Marine Farm 8216 Draw the AMA as per the MFA/AQNZ submission (map ref 074, Tawhitinui Bay, Tawhitinui Reach) (ie place the AMA around the current application area);
		98	Kuku Holdings Limited	R D Sutherland	98.1	Neutral	a) Place the AMA around the installed/consented farm and include space sought under application U200493 (marine farm 8217); OR b) Amend the AMA as shown on map 074 'Tawhitinui Bay -Tawhitinui Reach' attached to the MFA/AQNZ submission, as well as providing additional room in that AMA for the space sought under application U200493.
	CMU item: CMU 28 Aquaculture Management Area - AMA 15	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.36	Oppose	Realign AMA boundaries to ensure equivalent lines and line spacing (for marine farm 8213) can be accommodated within AMA, in accordance with Map 3 attached to the submission.
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.3	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map '035 Horseshoe Bay – Pelorus Sound'; OR b) Draw an AMA around site 8214 as installed/ consented. MF 8214
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.13	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map '035 Horseshoe Bay – Pelorus Sound'; b) Retain AMA as proposed; OR c) Draw an AMA around site 8215 as installed/consented.
	CMU item: CMU 28 Aquaculture Management Area - AMA 16	43	KPF INVESTMENTS LIMITED and UNITED FISHERIES LIMITED	Q A M Davies, A L Hills and E L Deason	43.18	Neutral	Marine Farm 8210 a) Amend the AMA consistent with the MFA/AQNZ submission map 035 'Horseshoe Bay – Pelorus Sound', provided the inside and outside boundaries of the AMA are parallel and public access to the inshore moorings and jetty is provided for; OR b) Place the AMA around the consented and/or actual space.

	113	Talley's Group Limited	R D Sutherland	113.18	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 035 'Horseshoe Bay- Pelorus Sound'; OR b) Amend AMA to reflect existing consented/installed space. (MArine farm 8208)
	100	Goulding Trustees Limited	Jim Goulding & Julian Goulding	100.8	Oppose	We seek the following relief: (a) Draw the AMA as per the MFA/AQNZ submission [Horseshoe Bay]; OR (b) Place the AMA around the consented and/or actual space (Marine Farm 8207). Reasons for the relief we seek are as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MAWRG). (b) This would enable the farm to continue to provide ecosystem services, including King Shag Considerations. (c) This would maintain employment and development in the region. (d) MFA AMA allows space for the loss of inshore lines to be transferred offshore.
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.35	Oppose	Realign AMA boundaries to ensure equivalent lines (to marine farm 8211) and line spacing can be accommodated within AMA, in accordance with Map 2 attached to the submission.
CMU item: CMU 28 Aquaculture Management Area - AMA 17	100	Goulding Trustees Limited	Jim Goulding & Julian Goulding	100.11	Oppose	We seek the following relief: (a) Draw the AMA as per the MFA/AQNZ submission [Horseshoe Bay]; OR (b) Place the AMA around the consented and/or actual space. Reasons for the relief we seek are as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MAWRG). (b) This would enable the farm to continue to provide ecosystem services, including King Shag Considerations. (c) This would maintain employment and development in the region. (d) MFA AMA allows space for the loss of inshore lines to be transferred offshore.
CMU item: CMU 28 Aquaculture Management Area - AMA 2	41	Bonnington	Kevin Bonnington	41.1	Oppose	a) Remove part of the western area of the farm and move this area seaward of the existing consent as per the proposed amended AMA mapped in the MFA/AQNZ submission (map ref 093, Camel Point, Tawhitinui Reach) [Farm 8201]
CMU item: CMU 28 Aquaculture Management Area - AMA 4	75	Clearwater Mussels Limited	R D Sutherland	75.13	Neutral	Farm 8183 Draw the AMA as per the MFA/AQNZ submission map 061 'Sheep Point - Hallam Cove
CMU item: CMU 28 Aquaculture Management Area - AMA 5	31	Womersley	Chris Womersley	31.1	Oppose	a) Draw the AMA as per the map provided in Schedule 2; OR b) Draw the AMA as per the MFA/AQNZ submission (map ref 053, Picnic Bay West, Tawhitinui Reach); [Farm 8181]
	75	Clearwater Mussels Limited	R D Sutherland	75.12	Neutral	Farm 8180 a) Amend AMA to reflect actual consented space; OR b) Draw the AMA as per the MFA/AQNZ submission map 053 'Picnic Bay West - Tawhitinui Reach'.
CMU item: CMU 28 Aquaculture Management Area - AMA 6	24	Marlborough District Council	Louise Walker	24.20	Support	Remove the areas of AMA 6 that overlap with ESMS 3.6 and ESMS 3.23.
	31	Womersley	Chris Womersley	31.2	Oppose	a) Place the AMA around the consented/actual space; [Farm 8179]
	113	Talley's Group Limited	R D Sutherland	113.14	Neutral	Amend AMA to reflect actual consented/installed space, as per the MFA/AQNZ submission map 052 'Picnic Bay East-Tawhitinui Reach'. (Marine farm 8177)
CMU item: CMU 28 Aquaculture Management Area - AMA 7	15	Shellfish Marine Farms Limited	Jim Goulding & Julian Goulding	15.1	Oppose	Three options presented for relief sought. (a) Draw the AMA as per the MFA/AQNZ submission [Cregoe Point, Tawhitinui Reach] except for a change at the southern end of the AMA. The alternative proposal set out in the attached map [8301 Proposed AMA Map.jpg] (proposed changes ref 'Adjusted MFA AMA' in legend).; OR (b) Draw the AMA as per the MFA/AQNZ submission [Cregoe Point, Tawhitinui Reach]; OR (c) Place the AMA around the consented and/or actual space.
	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.38	Oppose	AMA (for marine farm 8305) to be expanded in offshore area but equivalent inside area and an area to the north to be deleted, for ecological reasons, in accordance with Map 5 attached to submission.
	56	Worlds End Enterprises Limited	Brian & Nanette Bunting	56.1	Support	a) Support MFA b) Adopt MDC AMA c) Remain in current location
CMU item: CMU 28 Aquaculture Management Area - AMA 9	24	Marlborough District Council	Louise Walker	24.24	Support	The area of AMA 9 that overlaps with ESMS 3.6 on the southern side of Tawhitinui Reach be removed as an aquaculture management area.
	113	Talley's Group Limited	R D Sutherland	113.21	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 055 'Rams Head West - Tawhitinui Reach'; OR b) Amend AMA to reflect existing consented/installed space. - Marine farm 8311
	113	Talley's Group Limited	R D Sutherland	113.23	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 055 'Rams Head West - Tawhitinui Reach'; OR b) Retain AMA as proposed (Marine farm 8315)

		113	Talley's Group Limited	R D Sutherland	113.41	Neutral	a) Amend AMA to reflect existing consented/installed space (marine farm 8506); OR b) Retain AMA as proposed; OR c) Draw the AMA as per the MFA/AQNZ submission map 055 'Rams Head West - Tawhitinui Reach'.
	CMU item: CMU 28 Aquaculture Management Area - Finfish AMA 6	110	Kenepuru and Central Sounds Residents' Association	Andrew Caddie	110.1	Oppose	The proposed site should be declined.
		70	Nelson Marlborough Conservation Board	Kath Inwood	70.7	Oppose	Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 28 Maud Island.
		100	Goulding Trustees Limited	Jim Goulding & Julian Goulding	100.12	Oppose	We seek the following relief: (a) Draw the AMA as per the MFA/AQNZ submission [Horseshoe Bay]; OR (b) Place the AMA around the consented and/or actual space (Marine farm 8531). Reasons for the relief we seek are as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MAWRG). (b) This would enable the farm to continue to provide ecosystem services, including King Shag Considerations. (c) This would maintain employment and development in the region. (d) MFA AMA allows space for the loss of inshore lines to be transferred offshore.
	CMU item: CMU 28 Aquaculture Management Area - New AMA	78	Hughes	Ciaran Hughes	78.2	Oppose	Amend AMA to include an AMA over existing farm 8653 (see plan annexed as "B").
		62	The Marlborough Environment Centre	Tim Newsham	62.11	Oppose	Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 28 Maud Island,
		40	Tester	Jonathon Tester	40.2	Oppose	Map 8 - amend to include an AMA over existing farm 8653 (see plan annexed as 'B').
CMU 29: Nydia Bay	CMU item: CMU 29 Aquaculture Management Area - AMA 1	113	Talley's Group Limited	R D Sutherland	113.25	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 047 'Nydia Bay West- Pelorus Sound'; OR b) Retain AMA as proposed; OR c) Amend AMA to reflect consented/installed space.(Marine farm 8357)
		75	Clearwater Mussels Limited	R D Sutherland	75.19	Neutral	Farm 8369 a) Draw the AMA as per the MFA/AQNZ submission map 046 'Nydia Bay East - Pelorus Sound'; OR b) Retain AMA as proposed.
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.1	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map '047 Nydia Bay West – Pelorus Sound'; OR b) Retain AMA as proposed. MF 8358
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.16	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map '047 Nydia Bay West – Pelorus Sound'; OR b) Draw AMA around site 8354 as installed/consented.
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.17	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map '047 Nydia Bay West – Pelorus Sound'; OR b) Draw AMA around site 8355 as installed/consented.
CMU 31: Onapua Bay	CMU item: CMU 31 Aquaculture Management Area - New AMA	112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.15	Oppose	Include three AMAs to provide for blocks A, B and C of the marine farm sought as part of Private Plan Change and concurrent resource consent applications U170038, U170039 and U170040.
CMU 34: Port Gore	CMU item: CMU 34 Aquaculture Management Area - AMA 2	115	Darryl Slade, William King & Evelyn King (Estate)	Darryl Slade	115.1	Oppose	Make the underlying AMA, at its southern end, of sufficient width to accommodate the 150m wide farm. This is easily achieved by pivoting the seaward boundary of the AMA to the East (see yellow dotted line, Map 2 attached to submission). This proposed seaward boundary will be well within the 300m seaward AMA guidelines (see map 2) (8) The shallow scalloping of the southern inshore boundary of the AMA (circled On Maps 1&2), only complicates the drafting of the AMA for no discernible benefit. It should be straitened as in Map 2, or the inshore boundary of the AMA moved seaward minutely. The recent benthic survey included in the application to renew this site found no benthic concerns
	CMU item: CMU 34 Aquaculture Management Area - AMA 4	74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.14	Support	Retain AMA as proposed. MF 8173

	CMU item: CMU 34 Aquaculture Management Area - AMA 5	60	Port Gore Partnership & Slade King & King Ltd	Darryl Slade	60.1	Oppose	Preferred option: Keep the farm rectangular. Make the inshore reduction area rectangular and the full length of the farm. Make the inshore reduction area 43m wide. To include scallop. Move the resultant 764m by 43m rectangle to the seaward side of AMAS Port Gore. Simply take a strip off the inside of the farm and add it to the outside of the farm. The farm would maintain its current shape but would be located further seaward. This is I understand is one of the core proposals of variation one. Like would be replaced with like. The advantages are: The farm would fit its AMA. No need to relocate the reduced farm area to another AMA or CMU. Simplicity A seaward shift of the farm away from in shore areas Increased navigational access to inshore areas. Inshore and seaward boundaries are straight lines with no navigation surprises. Like is replaced with like Conflicts associated with scalloping and usable space solved. There is ample open space for a seaward shift. The disadvantage is: The extra cost of moving or replacing the two eastern most anchors, on lines one and two. less preferred option (2) Square up the reduction area. Make it 43m wide to remove scalloping. Add the triangle to the AMA at its NW end to use the space outside the 1 OOm line and include anchors on line 2. Extend the AMA to seaward by the equivalent area. Make the seaward area 509.33m long (two longlines) and 43.24m wide. This enables the four longlines excluded by variation one, to be relocated to seaward. The advantages are Scalloping effects on usable space removed. Replacement space for the four lines achieved. Longline two, anchor on site The seaward replacement space is two longlines in length, and no more, this results in the replacement space also being usable space. The disadvantages are. Longline one will need to be shortened, and its SE anchor moved. Navigation inshore and seaward is complicated by the two lines protrusion. Less inshore space is freed up than in option one. least Preferred Option (3) : Option three has the same inshore features and dimensions as option (2). However, the seaward replacement area is spread over the full length of the farm. This results in a slimmer dimension of 28.82m in width. This would allow three seaward lines to be installed. But the inshore reduction removes four longlines. Further, the requirement for structures to be at least 5m inside their boundaries results in additional 1,273.35 (5x254.67) square meters .of space becoming unusable when compared to option (2). While option (3) and (2) are both the same area, option (3) has considerably less usable space than option (2). The advantages are. Scalloping effect on usable space is removed. Straight line for ease of navigation along seaward boundary. Line two anchor included in AMA. The disadvantages are. Only three lines fit into the seaward replacement, four are needed. Longline one will need to move an anchor and have the backbone shortened. Navigation inshore is complicated by the two longline protrusion. Less inshore space freed up than option (1 ). Same space to seaward as option two but considerably less usable space. A note on the Marine Farmers Association Map Submission These maps were prepared after input from members at a workshop to consider Variation 1 AMA mapping. As this farm has its own AMA, I was the sole submitter for this AMA. I suggested option (3) at this meeting, and this has been adopted in the MFA submission. Upon further reflection it has become obvious to me that that this option is the least beneficial for reasons listed above. Because of the tight time parameters for this process, the deadline for alterations to the MFA mapping submission is well past. The fault is entirely mine. I no longer recommend option (3) for the reasons listed above. Consequently, I can only support the MFA mapping as being the least preferable option of the three above. Conclusion After many hours contemplating this situation, considering numerous permutations, I consider option (1) to be a clear winner. It is also the simplest. Remove a full length 43m wide strip from the inside of the farm and add it to the outside of the farm. This is a like for like transfer of both space and usable space. Maps attached to submission
CMU 36: Port Ligar	CMU item: CMU 36 Aquaculture Management Area - AMA 10	35	DAVID MUIR MCLAREN & LENORE MARY MCLAREN	Bruce Cardwell	35.4	Support	Retain the AMA for marine farm 8066 as proposed.
		75	Clearwater Mussels Limited	R D Sutherland	75.29	Support	Farm 8066 Retain AMA as proposed.
	CMU item: CMU 36 Aquaculture Management Area - AMA 11	35	DAVID MUIR MCLAREN & LENORE MARY MCLAREN	Bruce Cardwell	35.6	Oppose	Relocate 4 x 100m lines from our Hallam Cove farm 8188 to the seaward side of 8065 as per the map provided in the submission.
		113	Talley's Group Limited	R D Sutherland	113.9	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 022 'Fishing Bay- Port Ligar'; OR b) Retain AMA as proposed. (Marine farm 8063)
		100	Goulding Trustees Limited	Jim Goulding & Julian Goulding	100.7	Oppose	The relief we seek is as follows: (a) Draw the AMA as per the MFA/AQNZ submission [Fishing Bay, Port Ligar]; OR (b) Place the AMA around the consented and/or actual space (Marine Farm 8062). The reasons we seek the above relief is as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MARWG). (b) This would enable the farm to continue to provide ecosystem services, including King Shag considerations. (c) This would maintain employment and development in the region. (d) MFA AMA follows the existing consent as per MARWG King Shag suggestions.
		75	Clearwater Mussels Limited	R D Sutherland	75.10	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 022 'Fishing Bay - Port Ligar'; OR b) Retain AMA as proposed
		75	Clearwater Mussels Limited	R D Sutherland	75.28	Neutral	Farm 8065 a) Draw the AMA as per the MFA/AQNZ submission map 022 'Fishing Bay - Port Ligar'; OR b) Retain AMA as proposed.

CMU item: CMU 36 Aquaculture Management Area - AMA 2	35	DAVID MUIR MCLAREN & LENORE MARY MCLAREN	Bruce Cardwell	35.1	Support	Retain the AMA for marine farms 8497 and 8077 as proposed.	
	35	DAVID MUIR MCLAREN & LENORE MARY MCLAREN	Bruce Cardwell	35.2	Support	Retain the AMA for marine farm 8076 as proposed.	
	75	Clearwater Mussels Limited	R D Sutherland	75.27	Support	Farm 8076 Retain AMA as proposed.	
	CMU item: CMU 36 Aquaculture Management Area - AMA 3	35	DAVID MUIR MCLAREN & LENORE MARY MCLAREN	Bruce Cardwell	35.3	Oppose	Relocate 2 x 100m lines from our Hallam Cove farm 8188 to the seaward side of 8074 as per the map attached to the submission.
		113	Talley's Group Limited	R D Sutherland	113.11	Neutral	Draw the AMA as per the MFA/AQNZ submission map 009 'Cape Horn - Port Ligar'. (Marine farm 8075)
		75	Clearwater Mussels Limited	R D Sutherland	75.26	Support	Farm 8074 a) Retain AMA as proposed; OR b) Draw the AMA as per the MFA/AQNZ submission map 009 'Cape Horn - Port Ligar'.
	CMU item: CMU 36 Aquaculture Management Area - AMA 4	16	Sea Investments Limited	Jim Goulding & Julian Goulding	16.1	Oppose	Two options presented for relief sought: (a) Draw the AMA as per the MFA/AQNZ submission [Cape Horn, Port Ligar] OR (b) Place the AMA around the consented and/or actual space.
	CMU item: CMU 36 Aquaculture Management Area - AMA 5	16	Sea Investments Limited	Jim Goulding & Julian Goulding	16.2	Oppose	Two options presented for relief sought: (a) Draw the AMA as per the MFA/AQNZ submission [Cape Horn, Port Ligar] OR (b) Place the AMA around the consented and/or actual space.
	CMU item: CMU 36 Aquaculture Management Area - AMA 7	84	J & A SEGGIE FAMILY TRUST	Bruce Cardwell	84.5	Oppose	Marine Farm 8071 Draw the as per the proposed amended AMA map provided in Schedule 2.
	CMU item: CMU 36 Aquaculture Management Area - AMA 8	15	Shellfish Marine Farms Limited	Jim Goulding & Julian Goulding	15.3	Oppose	Two options presented for relief sought: (a) Draw the AMA as per the MFA/AQNZ submission [Maori Point, Port Ligar]; OR (b) Place the AMA around the consented and/or actual space.
75		Clearwater Mussels Limited	R D Sutherland	75.25	Neutral	Farm 8654 a) Draw the AMA as per MFA/AQNZ submission 091 'Maori Bay - Port Ligar'; OR b) Amend AMA to reflect recent re-consent and realignment.	
CMU item: CMU 36 Aquaculture Management Area - AMA 9	113	Talley's Group Limited	R D Sutherland	113.10	Neutral	Draw the AMA as per the MFA/AQNZ submission map 091 'Maori Bay- Port Ligar'. (Marine farm 8067)	
CMU 37: Port Underwood	CMU item: CMU 37 Aquaculture Management Area - AMA 13	24	Marlborough District Council	Louise Walker	24.18	Support	Council seeks that the AMA identified in Kaikoura Bay as AMA 13 (CMU 37), Port Underwood in Variation 1 for the now closed application U160067 be removed.
	CMU item: CMU 37 Aquaculture Management Area - AMA 16	74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.18	Neutral	Draw the AMA around site 8443 as installed/consented.
	CMU item: CMU 37 Aquaculture Management Area - AMA 21	113	Talley's Group Limited	R D Sutherland	113.27	Support	Retain AMA as proposed (Marine farm 8438)
	CMU item: CMU 37 Aquaculture Management Area - AMA 24	81	Allan Roy Tester, Ronald Dennis Bothwell and Rosemary Joy Bothwell	Jonathon Tester	81.1	Oppose	Marine Farm 8581 Delete the AMA shown over marine farms 8615, 8616 and 8581
	CMU item: CMU 37 Aquaculture Management Area - AMA 26	112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.11	Support	Retain AMA as proposed. (Marine farm 8433)
	CMU item: CMU 37 Aquaculture Management Area - AMA 27	112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.12	Support	Retain AMA as proposed. (Marine farm 8432)
		113	Talley's Group Limited	R D Sutherland	113.39	Support	Retain AMA as proposed. (Marine farm 8431)
	CMU item: CMU 37 Aquaculture Management Area - AMA 28	81	Allan Roy Tester, Ronald Dennis Bothwell and Rosemary Joy Bothwell	Jonathon Tester	81.2	Oppose	Marine Farm 8616 Delete the AMA shown over marine farms 8615, 8616 and 8581

	CMU item: CMU 37 Aquaculture Management Area - AMA 29	81	Allan Roy Tester, Ronald Dennis Bothwell and Rosemary Joy Bothwell	Jonathon Tester	81.3	Oppose	Marine Farm 8615 Delete the AMA shown over marine farms 8615, 8616 and 8581
	CMU item: CMU 37 Aquaculture Management Area - AMA 3	113	Talley's Group Limited	R D Sutherland	113.40	Support	Retain AMA as proposed (Marine farm 8454)
	CMU item: CMU 37 Aquaculture Management Area - AMA 31	113	Talley's Group Limited	R D Sutherland	113.38	Support	Retain AMA as proposed (Marine farm 8428)
	CMU item: CMU 37 Aquaculture Management Area - AMA 32	112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.13	Support	Retain AMA as proposed. (Marine farm 8429)
	CMU item: CMU 37 Aquaculture Management Area - AMA 33	112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.14	Support	Retain AMA as proposed. (Marine farm 8427)
	CMU item: CMU 37 Aquaculture Management Area - AMA 34	113	Talley's Group Limited	R D Sutherland	113.37	Neutral	Amend AMA to reflect consented/installed space.(Marine farm 8426)
	CMU item: CMU 37 Aquaculture Management Area - AMA 37	113	Talley's Group Limited	R D Sutherland	113.44	Support	Retain AMA as proposed. (Marine farm 8423)
74		Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.15	Support	Retain AMA as proposed. MF 8423	
	CMU item: CMU 37 Aquaculture Management Area - AMA 38	24	Marlborough District Council	Louise Walker	24.17	Support	Council seeks that the AMA 38 (CMU 37) identified in Kingfish Bay, Port Underwood in Variation 1 for the now withdrawn application U160860 be removed.
	CMU item: CMU 37 Aquaculture Management Area - AMA 39	113	Talley's Group Limited	R D Sutherland	113.35	Support	Retain AMA as proposed. (Marine farm 8422)
	CMU item: CMU 37 Aquaculture Management Area - AMA 40	113	Talley's Group Limited	R D Sutherland	113.34	Support	Retain AMA as proposed. (Marine farm 8421)
	CMU item: CMU 37 Aquaculture Management Area - AMA 43	113	Talley's Group Limited	R D Sutherland	113.36	Support	Retain AMA as proposed. (Marine farm 8640)
	CMU item: CMU 37 Aquaculture Management Area - AMA 44	74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.2	Support	Retain AMA as proposed. MF 8416
	CMU item: CMU 37 Aquaculture Management Area - New AMA	59	Port Underwood Association	Ken Roush	59.6	Neutral	Support the spatial allocation of Aquaculture Management Areas in Port Underwood.
CMU 38: South Marlborough	CMU item: CMU 38 Aquaculture Management Area - New AMA	23	Rene	Poneke Rene	23.1	Neutral	There is a need for provisions that do ensure that any water allocation regime for CMU 38, has sufficient capacity to be able to resource the domestic needs of the Wairau Block XII (as any new potential for affecting water allocation rights could be of a sensitive nature for existing current landowners of Maori block Wairau XII), as existing within CMU 38 'use space' and any water allocation NOT be allocated for export purposes
		85	Te Rūnanga o Kaikōura and Te Rūnanga o Ngāi Tahu (collectively referred to as Ngāi Tahu).	Trudy Heath	85.3	Oppose	Add to Volume 4 two new CMUs: CMU 38A –Te Tai o Marakoura, Enclosed Water; CMU8A – Te Tai o Marakoura, Open Water; and Specify the nautical boundary between these two CMUs. Amend Planning Map 16 accordingly. Extend Planning Map 16 to show the southern extent of Marlborough DC and the CMUs.



CMU 39: Squally Cove	CMU item: CMU 39 Aquaculture Management Area - AMA1	113	Talley's Group Limited	R D Sutherland	113.46	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 069 'Symonds Bay-Squally Cove'; OR b) Draw an AMA around sites as installed/ consented. - Marine farm 8298
	CMU item: CMU 39 Aquaculture Management Area - AMA10	17	Marlborough Oysters Ltd	Aaron Pannell	17.10	Support	Retain AMA as proposed for marine farm 8288 [inferred]
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.25	Support	Farm 8288 Retain AMA as proposed.
	CMU item: CMU 39 Aquaculture Management Area - AMA11	17	Marlborough Oysters Ltd	Aaron Pannell	17.4	Neutral	Place the AMA around the consented and/or actual space (Marine Farms 8505, 8286, 8287)
	CMU item: CMU 39 Aquaculture Management Area - AMA12	17	Marlborough Oysters Ltd	Aaron Pannell	17.3	Neutral	Place the AMA around the consented and/or actual space (Marine Farms 8283, 8285)
	CMU item: CMU 39 Aquaculture Management Area - AMA14	17	Marlborough Oysters Ltd	Aaron Pannell	17.5	Neutral	Place the AMA around the consented and/or actual space (Marine farms 8279, 8281)
		17	Marlborough Oysters Ltd	Aaron Pannell	17.6	Neutral	Move the AMA out by 30m from the consented space (Marine Farm 8280)
		71	Reader	Arthur John Reader	71.1	Support	Place the AMA around the consented and/or actual space in CMU 39 for Farm 8279.
		54	Wairangi Bay Marine Farms Ltd	Margaret Hippolite	54.1	Oppose	Marine farm/lease site 8280 in Wairangi Bay. We would like the farm left where it is except for moving the farm seaward by one line to avoid the moorings close by.
	CMU item: CMU 39 Aquaculture Management Area - AMA16	17	Marlborough Oysters Ltd	Aaron Pannell	17.9	Support	Retain AMA as proposed for marine farms 8275, 8276, 8277, 8504 [inferred]
	CMU item: CMU 39 Aquaculture Management Area - AMA17	17	Marlborough Oysters Ltd	Aaron Pannell	17.8	Support	Retain AMA as proposed for marine farms 8273 [inferred]
	CMU item: CMU 39 Aquaculture Management Area - AMA19	17	Marlborough Oysters Ltd	Aaron Pannell	17.7	Neutral	Place the AMA around the consented and/or actual space (Marine farm 8627)
		96	Beleve Limited, R J Davidson Family Trust, and Treble Tree Holdings Limited	R D Sutherland	96.2	Neutral	Include the existing farm within the AMA (Marine Farm 8627)
	CMU item: CMU 39 Aquaculture Management Area - AMA2	47	Okiwi Bay Aquaculture Ltd	Margaret Hippolite	47.1	Neutral	MF Site : 8297 Symonds Bay we request should stay where it is.
	CMU item: CMU 39 Aquaculture Management Area - AMA20	25	Hogg	David Hogg	25.3	Neutral	Either: a) Draw the AMA as per the MFA/AQNZ submission (Map ref 066, Matarau Point, Squally Cove); OR b) Retain the AMA as proposed; [Farm 8629]
	CMU item: CMU 39 Aquaculture Management Area - AMA3	74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.26	Neutral	Farm 8296 Draw the AMA as per the MFA/AQNZ submission map '067 McClarens Bay – Squally Cove'
	CMU item: CMU 39 Aquaculture Management Area - AMA4	113	Talley's Group Limited	R D Sutherland	113.45	Neutral	a) Draw the AMA as per the MFA/AQNZ submission map 067 'McClarens Bay-Squally Cove'; OR b) Draw an AMA around sites as installed/ consented. -Marine farms 8295 / 8636 / 8637
	CMU item: CMU 39 Aquaculture Management Area - New AMA	78	Hughes	Ciaran Hughes	78.1	Oppose	Amend AMA to include AMA over existing farm 8645 (see plan annexed as 'A').
		92	Sanford Limited	Alison Undorf-Lay	92.45	Neutral	Reinstate Site 8299 and Site 8300. These are important spat holding and seed growing areas that cannot be replicated in alternative locations. They were also not part of the MAWG identified inappropriate farms discussion.
40		Tester	Jonathon Tester	40.1	Oppose	Map 7 - amend to include an AMA over existing farm 8645 (see plan annexed as 'A')	
CMU 42: Tory Channel	CMU item: CMU 42 Aquaculture Management Area - AMA 1	5	Tory Channel Aquaculture Limited	Michael Norton	5.1	Oppose	Marine farm 8405 Marine farm 8405 stay in the present area.
		24	Marlborough District Council	Louise Walker	24.26	Support	The area of AMA 1 in CMU 42 that overlaps with ESMS 5.3 (In Tory Channel) be removed as an aquaculture management area.
		33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.14	Support	Retain the AMAs and FAMAs in CMU 42 as proposed.

	CMU item: CMU 42 Aquaculture Management Area - AMA 2	24	Marlborough District Council	Louise Walker	24.22	Support	The area of AMA 2 that overlaps with ESMS 5.11B (whose ESMS number has subsequently been amended to 5.12B) amended to be at Tory Channel – Ngaruru Bay be removed as an aquaculture management area.
		33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.15	Support	Retain the AMAs and FAMAs in CMU 42 as proposed.
		112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.10	Support	Draw the AMA as per the MFA/AQNZ submission map 044 'Ngaruru Bay – Tory Channel'. [Farm 8406]
	CMU item: CMU 42 Aquaculture Management Area - AMA 3	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.16	Support	Retain the AMAs and FAMAs in CMU 42 as proposed.
		78	Hughes	Ciaran Hughes	78.4	Neutral	Adjust the boundary of the AMA over existing marine farm 8639 (AMA) so that it covers the entire current farm footprint see plan annexed as "D").
		40	Tester	Jonathon Tester	40.4	Neutral	Map 14 - adjust the boundary of the AMA over existing marine farm 8639 (AMA3) so that it covers the entire current farm footprint (see plan annexed as 'D').
	CMU item: CMU 42 Aquaculture Management Area - AMA 4	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.17	Support	Retain the AMAs and FAMAs in CMU 42 as proposed.
	CMU item: CMU 42 Aquaculture Management Area - AMA 5	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.18	Support	Retain the AMAs and FAMAs in CMU 42 as proposed.
	CMU item: CMU 42 Aquaculture Management Area - AMA 6	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.19	Support	Retain the AMAs and FAMAs in CMU 42 as proposed.
		112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.3	Support	Retain AMA as proposed. (Farm 8411)
	CMU item: CMU 42 Aquaculture Management Area - AMA 7	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.20	Support	Retain the AMAs and FAMAs in CMU 42 as proposed.
		112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.4	Support	Retain AMA as proposed (marine farm 8412)
	CMU item: CMU 42 Aquaculture Management Area - AMA 8	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.21	Support	Retain the AMAs and FAMAs in CMU 42 as proposed.
		112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.5	Support	Retain AMA as proposed. (Marine farm 8413)
	CMU item: CMU 42 Aquaculture Management Area - AMA 9	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.22	Support	Retain the AMAs and FAMAs in CMU 42 as proposed.
		112	Apex Marine Farm Limited	Amanda Hills/ Emma Deason/ Bruce Hearn	112.6	Support	Retain AMA as proposed. (Marine farm 8414)
	CMU item: CMU 42 Aquaculture Management Area - Finfish AMA 1	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.23	Support	Retain the AMAs and FAMAs in CMU 42 as proposed.
	CMU item: CMU 42 Aquaculture Management Area - Finfish AMA 2	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.24	Support	Retain the AMAs and FAMAs in CMU 42 as proposed.
	CMU item: CMU 42 Aquaculture Management Area - Finfish AMA 3	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.25	Support	Retain the AMAs and FAMAs in CMU 42 as proposed.
CMU item: CMU 42 Aquaculture Management Area - Finfish AMA 4	33	KiwiRail Holdings Limited (KiwiRail)	Rebecca Beals	33.26	Support	Retain the AMAs and FAMAs in CMU 42 as proposed.	
CMU item: CMU 42 Aquaculture Management Area - New AMA	62	The Marlborough Environment Centre	Tim Newsham	62.13	Oppose	Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 42 Tory Channel for finfish farming	
CMU 43: Waitata Bay	CMU item: CMU 43 Aquaculture Management Area - AMA 1	100	Goulding Trustees Limited	Jim Goulding & Julian Goulding	100.3	Oppose	The relief that we seek is as follows: (a) Draw the AMA as per the MFA/AQNZ submission [Hamilton Cove, Waitata Bay]; OR (b) Place the AMA around the consented and/pr actual space. The reasons for the relief we seek is as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MARWG). (b) This would enable the farm to continue to provide ecosystem services. (c) This would maintain employment and development in the region. (d) MFA AMA allows space for the loss of inshore lines to be transferred offshore. (Marine Farm 8102)

	CMU item: CMU 43 Aquaculture Management Area - AMA 2	100	Goulding Trustees Limited	Jim Goulding & Julian Goulding	100.4	Oppose	The relief we seek is as follows: (a) Draw the AMA as per the MFA/AQNZ submission [Hamilton Cove, Waitata Bay]; OR (b) Place the AMA around the consented and/or actual space (Marine Farm 8102). The reasons for the relief we seek is as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MARWG). (b) This would enable the farm to continue to provide ecosystem services. (c) This would maintain employment and development in the region. (d) This would avoid the sensitive benthic areas. (e) MFA AMA allows space for the loss of inshore lines to be transferred offshore.
	CMU item: CMU 43 Aquaculture Management Area - AMA 3	100	Goulding Trustees Limited	Jim Goulding & Julian Goulding	100.5	Oppose	The relief we seek is as follows: (a) Draw the AMA as per the MFA/AQNZ submission [Turner Bay, Waitata Bay]; OR (b) Place the AMA around the consented and/or actual space (Marine Farm 8100). The reasons for the relief we seek is as follows: (a) This would generally meet the principle of the Marlborough Aquaculture Review Working Group (MARWG). (b) This would enable the farm to continue to provide ecosystem services. (c) This would maintain employment and development in the region. (d) MFA AMA allows space for the loss of inshore lines to be transferred offshore.
	CMU item: CMU 43 Aquaculture Management Area - AMA 6	100	Goulding Trustees Limited	Jim Goulding & Julian Goulding	100.1	Oppose	The relief that we seek is as follows: (a) For the most part, draw the AMA as per the MFA/AQNZ submission [Steamboat Bay, Waitata Bay] except for a small change on the SW corner of the AMA. The alternative proposal set out in the attached map [8097 Proposed AMA Map.jpg] (proposed changes ref 'Adjusted MFA AMA' in legend); OR (b) Draw the AMA as per the MFA/AQNZ submission [Steamboat Bay, Waitata Bay]; OR (c) Place the AMA around the consented and/or actual space (marine farm 8097). The reasons for seeking the above relief is as follows: (a) The SW corner is to follow the proposed MDC AMA to create a straight line allowing for the appropriate warp length of the relocated inside lines. (b) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MARWG). (c) This would enable the farm to continue to provide ecosystem services. (d) This would maintain employment and development in the region. (e) MFA AMA allows space for the loss of inshore lines to be transferred offshore upon incorporating relief option (a).
	CMU item: CMU 43 Aquaculture Management Area - AMA 8	6	Mansfield	Peter Allen Mansfield	6.1	Oppose	Marine farms 8090, 8091, 8092, 8093, 8094 & 8095 Rezone the coastal marine area fronting Lot 3 DP 19539 and Lot 1 DP 20420 as Coastal Marine Zone 1 to preserve the significant natural character and recreational value of the area.  [Inferred]
		24	Marlborough District Council	Louise Walker	24.23	Support	The area of AMA 8 that overlaps with ESMS 3.31 at Rat Point Reef be removed as an aquaculture management area.
		15	Shellfish Marine Farms Limited	Jim Goulding & Julian Goulding	15.2	Oppose	Two options presented for the relief sought: (a) Draw the AMA as per the MFA/AQNZ submission [Rat Point, Waitata Bay]; OR (b) Place the AMA around the consented and/or actual space.
		100	Goulding Trustees Limited	Jim Goulding & Julian Goulding	100.2	Oppose	The relief that we seek is as follows: (a) For the most part, Draw the AMA as per the MFA/AQNZ submission [Camp Bay, Waitata Bay] except for a small change on the NW corner of the AMA. The alternative proposal set out in the attached map [8095 Proposed AMA Map.jpg](proposed changes ref 'Adjusted MFA AMA' in legend) OR (b) Draw the AMA as per the MFA/AQNZ submission [Steamboat Bay, Waitata Bay]; or (c) Place the AMA around the consented and/or actual space (Marine Farm 8095). The reasons for seeking the above relief is as follows: (a) NW Corner has been adjusted to allow for practical farming shape and to minimize the loss in backbone length while maintaining the 100m distance from shore. (b) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MARWG). (c) This would enable the farm to continue to provide ecosystem services. (d) This would maintain employment and development in the region. (e) MFA AMA allows space for the loss of inshore lines to be transferred offshore upon incorporating relief option (a).
		100	Goulding Trustees Limited	Jim Goulding & Julian Goulding	100.6	Oppose	We seek the following relief: (a) Draw the AMA as per the MFA/AQNZ submission [Camp Bay, Waitata Bay]; OR (b) Place the AMA around the consented and/or actual space (Marine Farm 8093). Reasons for the relief we seek is as follows: (a) This would generally meet the principles of the Marlborough Aquaculture Review Working Group (MARWG). (b) This would enable the farm to continue to provide ecosystem services. (c) This would maintain employment and development in the region. (d) MFA AMA allows space for the loss of inshore lines to be transferred offshore.
CMU 44: Waitata Reach	CMU item: CMU 44 Aquaculture Management Area - AMA 10	21	Black	Philip Anthony Black	21.1	Oppose	Drop the proposal to create AMA10 and allow neither aquaculture nor finfish farming in the space that would then be free from aquacultural or finfish management.
	CMU item: CMU 44 Aquaculture Management Area - AMA 12	75	Clearwater Mussels Limited	R D Sutherland	75.6	Support	Farm 8084 a) Draw the AMA as per the MFA/AQNZ submission map 079 'Waihinu Bay - Pelorus Sound'; OR b) Retain AMA as proposed

	CMU item: CMU 44 Aquaculture Management Area - AMA 13	73	WILLANS	IAN WILLANS	73.1	Neutral	a) Draw the AMA as per the MFA/AQNZ submission (Map ref 079, Waihinu Bay, Pelorus Sound); OR b) Retain the AMA as proposed.
		74	Aroma (N.Z.) Limited and Aroma Aquaculture Limited	Q A M Davies, A L Hills and E L Deason	74.24	Support	Farm 8082 Retain AMA as proposed.
	CMU item: CMU 44 Aquaculture Management Area - AMA 2	29	Skeggs	Bryan Skeggs	29.1	Oppose	a) Draw the AMA as per the MFA/AQNZ submission (map ref 090, Richmond Bay, Pelorus Sound); OR b) Ensure that the AMA is drawn in such a way that the consented layout can be incorporated, and the perimeter of the consented area does not change [Farm 8205]
	CMU item: CMU 44 Aquaculture Management Area - AMA 9	76	Marlborough Aquaculture Limited	David Clark	76.7	Oppose	Amend mapping of CMU 44 at Burnt Point/Waihinu so that the AMA aligns with the existing marine farms 8086 and 8087 or alternatively so that the proposed AMA aligns with the existing layout of the lines in accordance with the attached plan.
	CMU item: CMU 44 Aquaculture Management Area - Finfish AMA 7	110	Kenepuru and Central Sounds Residents' Association	Andrew Caddie	110.2	Oppose	The proposed site should be declined.
		70	Nelson Marlborough Conservation Board	Kath Inwood	70.8	Oppose	Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 44 Waitata Reach for finfish farming.
	CMU item: CMU 44 Aquaculture Management Area - Finfish AMA 8	70	Nelson Marlborough Conservation Board	Kath Inwood	70.9	Oppose	Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 44 Waitata Reach for finfish farming.
	CMU item: CMU 44 Aquaculture Management Area - Finfish AMA 9	70	Nelson Marlborough Conservation Board	Kath Inwood	70.10	Oppose	Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 44 Waitata Reach for finfish farming.
	CMU item: CMU 44 Aquaculture Management Area - New AMA	26	AJ KING FAMILY TRUST & SA KING FAMILY TRUST	Bruce Cardwell	26.5	Oppose	a) Draw the AMA as per the MFA/AQNZ submission (map ref 090, Richmond Bay, Pelorus Sound) (if lines are not being relocated from Hallam Cove farm 8188); OR b) Draw the AMA so that it encompasses the existing lines/structures as well as the 4 x 150m lines being relocated from 8188) [Farm 8204]
		62	The Marlborough Environment Centre	Tim Newsham	62.12	Oppose	Amend Policy 13.21.7. h (ii) so that there is no provision of new FAMA space in CMU 44 Waitata Reach for finfish farming. Amend Policies 13.21.1-6 as required to ensure no further provision of AMA space in CMU 44 Waitata Reach for marine farming.
		70	Nelson Marlborough Conservation Board	Kath Inwood	70.15	Oppose	The Decision Sought is to Amend Policies 13.21.1-6 as required to ensure that no new AMA space is allocated in CMU 44 Waitata Reach for marine farming.
		86	Te Rūnanga o Ngāti Kuia Trust	Julia Eason	86.12	Neutral	To retain the removal of farms in Waitata reach.
CMU 45: Waitui Bay	CMU item: CMU 45 Aquaculture Management Area - New AMA	55	Waitui Holdings Limited	Noel Moleta	55.1	Oppose	To enable kelp farming to occur in CMU 45 through the use of 2 AMAs in the areas shown on the plan attached. Alternatively to redefine CMU45 as an Offshore CMU where such an activity would be a discretionary activity.
Near-shore CMU		76	Marlborough Aquaculture Limited	David Clark	76.5	Oppose	Amend mapping of CMU 9 at Blow Hole Point to provide for an AMA where the Submitters existing marine farm is positioned as shown on the attached plan.
		113	Talley's Group Limited	R D Sutherland	113.8	Oppose	a) Relocate site 8059 to equivalent space with equivalent characteristics in an alternative bay in the Marlborough Sounds, such as Outer Admiralty Bay, in line with the rest of this submission; OR b) Include site 8059 within an AMA, by creating an AMA around the consented space.
Open Water CMU	CMU item: Open Water CMU - MF8001	34	CLIFFORD BAY MARINE FARMS LTD	Quentin Alexander Muir Davies and Kerry Morgan Moor	34.8	Neutral	For marine farm 8001 a) Draw the AMA as per the Clifford Bay Realignment Option B (attached to submission); OR b) Draw the AMA as per the Clifford Bay Realignment Option A (attached to submission); c) Place the AMA around the installed/consented space; OR d) Relocate to another bay in the Marlborough Sounds where there is existing marine farming, in line with the rest of this submission
	CMU item: Open Water CMU - MF8561	61	Wakatu Incorporation and Kono NZ LP	Riki Kotua	61.42	Oppose	That the existing farm 8561 be zoned as being within an AMA; or that a new consent for this farm otherwise is provided for as a controlled activity.