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Ministry for Primary Industries  
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### **Written feedback on extending the duration of existing consents for marine farming**

As one of the leading environmental Non-Governmental Organisations (eNGOs) in Aotearoa New Zealand, World Wide Fund for Nature – New Zealand (WWF-New Zealand) supports science-based, pragmatic solutions that can deliver a future where humanity lives in harmony with nature.

WWF-New Zealand appreciates the opportunity to participate in the stakeholder hui held on 1 March 2024 and to provide written feedback on the Government's proposal to extend existing marine farm consent durations by an additional 25 years via amendment to the Resource Management Act 1991 (RMA).

Key details of the proposal are as follows:

- All existing marine farming consents will have their consent expiry date moved 25 years out from the current expiry date. No farms will be excluded.
- This extension will be automatic and will not require any application.
- Only the expiry date of each consent will change, with no changes to or reconsideration of consent conditions.

WWF-New Zealand *does not* support this proposal and we provide further detail on our position in this letter.

### **There is a lack of public engagement and due process**

The request for engagement on this proposal has been utterly insufficient in terms of timeframe. A week-long consultation period is inadequate time for any legislative amendment, especially one that will impact 1200 marine farms and communities around the country. Providing stakeholders such a limited timeframe clearly indicates the Ministry and responsible Minister are not genuinely interested in receiving or considering stakeholder input.

The information provided to inform stakeholders' consideration of the proposal is also insufficient. We note the consultation materials entailed only a brief summary of the proposal. It provided no detail about the particular circumstances of each marine farm proposed for consent extension, or any environmental assessment of their impacts to date.

Given New Zealand's marine environment is a public resource, it is important that there is robust public engagement on these matters, including marine farm reconsents. Locking in 1200 existing marine farms for another 25 years through this proposal would curtail the opportunity for the public

to have their say on these farms, including how they continue to impact their surrounding environments. This proposed process is a breach of democratic process.

### **The case for change is not well made**

WWF-New Zealand considers the National Environmental Standards for Marine Aquaculture (NES-MA) has been effective in managing and consenting marine farms, and therefore, that the proposed legislative changes are not necessary.

Locking in existing marine farms for another 25 years as is proposed does not allow regular reassessment of existing farms or mitigation when circumstances change, or if issues arise in future. Some farms may have been deemed suitable at one point in time, but they may no longer be suitable in today's circumstances – especially those associated with our changing climate.

Going forward, it is critical that marine farms are reviewed regularly and that regional and unitary councils continue to draw on the best, most up-to-date science to inform consenting decisions and provide their expertise on the matter.

### **There is an egregious lack of regard for environmental impact inherent in this proposal**

WWF-New Zealand is supportive of aquaculture when it is done sustainably and when marine farms are placed in the right locations and well-managed. Poorly located or managed marine farms have significant detrimental impacts on the environment.

These negative environmental impacts include water eutrophication, a reduction in water quality, the introduction and transmission of diseases, and alternation and destruction of natural habitats, among other issues.<sup>1</sup>

Climate change may further aggravate the negative impacts of marine farms. We have already seen negative impacts of climate change on salmon farms in the Marlborough Sounds and there is lots of uncertainty as to what the implications of climate change will be in the future. A lot can change in 25 years and to extend the consents would not allow the environmental risks to properly be considered and assessed.

Farms that currently do not have negative environmental impacts may start having some later on, so marine farms and their potential impacts should be reviewed more regularly as new information arises.

There is considerable risk for both the industry and the environment if consents are extended with the assumption that circumstances that allowed farms to gain consent in the past haven't and will not change. It is our view that conditions should be reviewed as more information arises to avoid irreversible environmental harm.

### **There is reputational risk and other risk in this proposal**

The proposal seemingly looks to eliminate continuous environmental assessment, and this will bring the seafood sector's international and domestic reputation into further question. The result would be diminishing social license to operate and a loss of general support from the public and stakeholders.

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<sup>1</sup> Mancuso, M., (2015). Effects of Fish Farming on Marine Environment. Journal of Fisheries Sciences. Volume 9, Issue 3

Finally, we note this proposal disregards New Zealand's commitments on environment and climate change outcomes arising in free trade agreements, including the NZ-UK Free Trade Agreement. There are both reputational and substantive repercussions from violating these commitments.

### **Conclusion**

The case for extending existing marine farm consent durations is not well made, and the process proposed is both undemocratic and risks significant adverse outcomes in future. Further, given that existing regulation is already effective in addressing consenting costs and timelines, legislating is unnecessary and a waste of time and resources.

WWF-New Zealand strongly opposes this proposal to extend existing marine farm consent durations by an additional 25 years. We urge officials to impress upon the Minister the risks of proceeding and to recommend that the proposal be discontinued.

Ngā mihi



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