

BEFORE THE THAMES-COROMANDEL DISTRICT COUNCIL

IN THE MATTER of the Resource Management Act (RMA) 1991

AND

IN THE MATTER of the proposed Thames-Coromandel District
Plan Variation One – Natural Character

**ORAL STATEMENT OF
BRENT ROBERT PARKER**

and

ALISON UNDORF-LAY

On behalf of

**SANFORD LIMITED AND NORTH ISLAND MUSSEL LIMITED (NIML)
AND AQUACULTURENZ**

18 February 2016

QUALIFICATIONS AND EXPERIENCE

1. My full name is Brent Robert Parker. I am the Coromandel Farming Operations Manager for Sanford Limited (“**Sanford**”). I am responsible for managing Sanford's Coromandel Greenshell mussel farms. I oversee the company's aquaculture investments across 258 hectares of water space. I have held this position for 2 years. Prior to this I was the operations manager for Greenshell Mussels Limited. I have worked in aquaculture for 18 years, always based in Coromandel.
2. My full name is Alison Elizabeth Undorf-Lay. I am the Industry Liaison Manager for Sanford based in Auckland. I have a Masters of Science (Resource Management) and have worked for Sanford for six years.
3. Together we are presenting on behalf of Sanford, submitter 118, and North Island Mussels Limited (**NIML**), submitter 117. NIML is a 50:50 Joint Venture between Cedenco and Sanford. NIML leases and manages on behalf of its shareholders water space, farms and operates a processing plant in Tauranga.
4. We are also presenting evidence on behalf of Aquaculture NZ who were both a submitter and further submitter on the proposed Variation.
5. Sanford and NIML are absolutely committed to the Thames-Coromandel District – socially and financially. Both of us are members of Aquaculture NZ and their A+ Certification and sustainability programme for auditing and benchmarking marine farms. We farm sustainably and strive to be exemplary environmental stewards.
6. Aquaculture NZ has been involved in submitting on RMA plans for the last 15 years. They are passionate about communities and councils working together collaboratively. They apologise for not being here in person.

OUR SUBMISSION

7. Sanford and NIML collaborated on their submission and further submission. We also lodged a further submission in support of AquacultureNZ.
8. Both Sanford and NIML opposed the extension of proposed landscape units seaward into the Coastal Marine Area (**CMA**). While these water spaces were not mapped in the proposed Variation they are mapped in the Beca landscape assessment and, they

are sometimes but not consistently referenced in the Natural Character Evaluation Tables which sits alongside these maps in the Beca Report.

9. Sanford and NIML collectively own (or lease) nine marine farms, which are located within five of the 'outstanding' or 'high naturalness' landscape units in the Beca Assessment Report. The locations of these farms were identified in our submissions and are set out below, see clause 29 of this submission. The Beca Report creates concern and uncertainty. It is not clear if Council or submitters can comment / amended the Report, nor how the Report will be used in Council's decision making at this hearing or in the future.
10. The District Council's legal jurisdiction ends at the mean high water spring (**MHWS**) and it is the Waikato Regional Council's RMA duties and responsibilities to address CMA landscapes. It is not clear why the Beca Report mapped coastal water features. The Waikato Regional Council has held off its landscape assessment until the completion of the Hauraki Spatial Plan process.
11. That said, we acknowledge that the Officer's Report (**OR** clause 21, page 10) says:

The Natural Character Overlay Planning Maps included in the Variation, which will become part of the District Plan, snap these areas back to match the Council's area of jurisdiction being landward of the Mean High Water Springs. Submitters can take comfort that activities in the Coastal Marine Area (i.e. below the mean high water springs) are not subject to the Variation or District Plan provisions and are in fact outside the Council's jurisdiction.

Note, Sanford underline

12. We appreciate that the Council has not mapped in the proposed Variation seaward of the MHWS. However as the CMA component of the landscape unit remains in the Beca Report in affect, the CMA continues to be part of the Unit. The Officer has given us no guarantee that in future planning processes such as submitting on resource consents (or in District Council landscape advocacy) Council will be silent on the Beca CMA commentary.
13. For example, when the Waikato Regional Council engages in its stakeholder consultation on regionally outstanding landscapes will the District Council refer to the Beca Report? It is our submission that Council should instruct its consultants (Beca) to revise their report by deleting references to landscape characteristics and lines on maps that fall outside of council jurisdiction (ie that are located in the CMA), or Council should only partial accept the report.

14. An additional matter of concern if the Beca Report is not amended, the Officers have suggested in response to some submitters that an amendment be made (OR clause 37, page 13) to include recognition of some marine farms, specifically they say:

Units 11, 13, 19 – amend the Beca Assessment to specifically make reference to marine farms (existing and consented) within those units in the evaluation table descriptions.

15. While we support the Officer's recommendation to recognise existing and consented marine farms, in the event that the Beca Report is not amended as we have proposed, we ask that the Officer's recommendation be extended to Units 8, 9, 10, 17 and 51 so that it recognises those marine farms owned or leased by Sanford and NIML. Both Sanford and the NIML submissions proposed this.
16. Furthermore, it was our submission that marine farms are an accepted part of the Coromandel landscape. To this end, Sanford does not support the Beca wording in the Natural Character Evaluation Tables because we think it expresses negativity towards marine farms when in fact 73% of the Thames-Coromandel & Hauraki residents surveyed by MPI¹ held a positive view of aquaculture in their area. And 69% of local residents did not view aquaculture as having a negative impact on New Zealand's natural beauty and a further 9% did not have a view².
17. With this 2014 MPI survey in mind, it is our submission that the plan if it is not amended to withdraw features in the CMA should be neutral when referencing marine farms in the Evaluation Tables. We submit the following wording be used:

Biophysical Characteristics, Landuse: surrounding waters are farmed

Perceptual Characteristics, Context / Setting: marine farms are located within or close to the Unit

18. In summary we support (i) removing all references to features and lines on maps seaward of MHWS, or in the event that this is not done we request (ii) recognising existing marine farms on the maps and in the Evaluation Tables in neutral language.
19. Aquaculture NZ's view is slightly different but not inconsistent with Sanford and NIML. It is their view that the variation should go on hold until such time that identification of natural character in the coastal marine area (CMA) can be carried out in a

¹ Perceptions of aquaculture in key growing areas, Figure 5, page 29MPI 2014

² Figure 12, page 49

collaborative and integrated manner with the Waikato Regional Council plan process and they asked for more clarity and consistency regarding the nature and offshore extent of natural character in the CMA.

20. If the variation is retained, then Aquaculture NZ submit it is important that the methodology and classification of natural character units be reviewed on a case by case basis and where marine farms exist within proposed natural character areas these farms must be recognised as being consistent with the values of those areas.
21. If the District Council was to accept the AquacultureNZ submission and put the Variation on hold both Sanford and NIML would accept this, and in fact this would be our preferred outcome of the hearing.

SANFORD AND NIML COROMANDEL INVESTMENTS

22. Greenshell mussel farming matters to Coromandel. It brings a significant number of good jobs³ and economic wealth to what is a relatively isolated rural community. Mussel farming positively contributes to the social wellbeing of this community.
23. The combined contribution in annual community wages into Coromandel town by Sanford and NIML is about \$1.5 million a year. An additional \$10 million is spent on wages in Tauranga.
24. Sanford owns about 900 mussel lines in Coromandel (averaging 140m in length). Sanford employs 20 full time permanent staff in Coromandel, operates three work barges and a land based workshop. Currently all 20 staff are local Coromandel people who were born and raised in the District.
25. NIML and/or its shareholders own or have long term leases on 400 mussel lines and employs 28 staff full time staff in Coromandel at peak, and 20—22 staff year round.
26. Collectively the two companies manage about 429 ha of water space, 1300 lines producing 13,000 tonnes of product a year. The plant processing this product is

³ MPI the Value of a Job

located in Tauranga where NIML employs 270 staff at seasonal peak. Local hauling companies transport product between Coromandel and Tauranga.

27. Both companies are vertically integrated. A reduction in mussel tonnage from the Coromandel farms will adversely impact on the profitability of the harvest and downstream efficiencies of scale in the Tauranga processing plant as evidenced by the unfortunate 2015 closure of the Sanford Christchurch plant as a result of several La Nino years and a shortage of both spat and mussel product for processing.
28. It is important to the ongoing success of Sanford and NIML that the size, productivity and environmental integrity of our existing marine farms in Coromandel are maintained. Key to this is maintaining our existing use rights to the water space and having our farms proactively protected from inappropriate new uses.

MARINE FARMS IN LANDSCAPE UNITS

29. Five of the Natural Character landscape units include areas where marine farms owned by Sanford or leased and managed by NIML are located. In total nine farms are affected. All farms have been there for many years.

30. The landscape units we have submitted on are:

Unit 8 **Kirita Bay North** (where we have 3 farms)
Proposed as an area of high naturalness

Unit 9 **Hikurnagi Point/Te Kouma Head** (where we have 2 farms)
Proposed as an area of high naturalness

Unit 10 **Rangipukea / Wekarua Island Group** (we have 1 farm)
Proposed as an area of outstanding natural character

Unit 17 **Whawenga Point to Hautapu Point** (we have 3 farms)
Proposed as an area of outstanding natural landscapes

Unit 51 **Kennedy Bay – Wainuiototo**, New Chums (we have 1 farm that lies outside the landscape unit). This area is proposed as outstanding.

31. Water space in the Coromandel is valued between \$70 - 150,000 a hectare depending on location, without product. Water space for marine farming is a scarce

resource. It is difficult and costly to establish new marine farms. This means that it is very important that existing farms (licences) are recognised as having being accepted and an appropriate use of the water space.

IN CONCLUSION

32. Finally, concern has been raised by some submitters when reading the Officer's Report that Sanford has supported the landscape zoning as in applies landward of MHWS. This is incorrect, Sanford has no view as the appropriateness or otherwise of these landscapes units.

Dated this 18th of February 2016

**Brent Parker and Alison Undorf-Lay
For Sanford Ltd., North Island
Mussel Limited, and AquacultureNZ**

Attachment “A”