

**Submission to the Primary Production Select Committee on
the Aquaculture Amendment Bill (No 3) 239**

10 February 2011

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The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 51 nationally organised societies and National Members. It has 23 branches throughout the country to which women from some 150 societies are affiliated. The Council's function is to serve women, families and the community through research, study, discussion and action.

This submission is prepared by the Environment Standing Committee, incorporating the opinions of nationally organised societies, branches and individuals together with a review by the Parliamentary Watch Committee and the NCWNZ Board.

Introduction.

1. The National Council of Women of New Zealand appreciates the economic importance of developing the aquaculture industry. We are also concerned that any development should be sustainable and not have negative effects on the environment. Members would support the need for monitoring and would prefer to see this as a countrywide requirement undertaken by a government department rather than being the responsibility of territorial authorities.

**Schedule 1 Marine Farming Permit 364 (Waikato Communal Area)
Section 25 Review.**

2. The Bill provides for the possibility for existing marine farms to be monitored. For example the Waikato regional Council "may" serve notice "of its intention to review the conditions of the resource consent." (Schedule 1, section 25) The purpose of the review is defined with Section 25, part (ii), stating that the review may "require the holder of this resources consent to adopt the best practicable option to remove, or reduce, adverse effects on the environment from the exercise of this resource consent." The review must be paid for by the consent holder. A regular review of each marine farm is optional, not a requirement.
3. NCWNZ believes that regular reviews should be mandatory on all marine farms throughout New Zealand and not optional. Vigilance is needed to maintain New Zealand's reputation for high-quality, pristine aquaculture and to detect unforeseen problems at an early stage. Regular reviews, by a central body such as MAF, would ensure the reduction of biosecurity risks and minimise the risk of contaminating adjacent environments. This is seen as an important measure to ensure that our reputation for cleanliness and quality is maintained.

Schedule 2

Amendments to Tasman regional coastal plan

New section 2A in Schedule 36.1D, Assessment Criteria for Discharges from Aquaculture.

Rule 25.1.5GG Ch 25.1.9

- 4 The Bill's cautious and adaptive approach when new species are developed for aquaculture is admirable.

37.2.1A Discharges from Aquaculture.

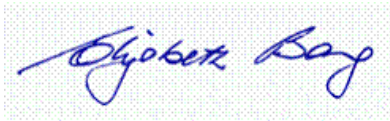
- 5 However, the monitoring of discharges from aquaculture is in the hands of the farmers themselves. The law commendably requires the "Adoption of the best practicable option to prevent or minimise any actual or likely adverse effect to the environment of the discharge." "Identification" and "location of monitoring control sites" is required (37.2.1A (a) (i)). What appears to be missing is a monitoring regime by inspectors who can gain an overview of a wide range of aquaculture operations.
- 6 There are potentially other economic activities which could suffer as a result of poorly undertaken aquaculture operations. Given there is no obvious monitoring regime put in place, NCWNZ would question the ability to protect any industry arising 'down-stream'.
- 7 NCWNZ believes that the monitoring of discharges should not be left to the discretion of each marine farmer, but that waste management should be regularly inspected and monitored, to ensure that high standards are maintained.

Research into Effects of Aquaculture.

- 8 NCWNZ noted in 2004 (SL/04/02) that there was little research into the environmental and ecological effects of aquaculture ventures. This situation still pertains. Furthermore, no law currently requires assessment of the cumulative effects of aquaculture on the coastal environment.
- 9 The moratorium on aquaculture expansion arose as a result of the lack of research into the impacts of aquaculture in the measurable vicinity, and more broadly into areas where others had enterprise interests. The moratorium period was set to ensure appropriate research and investigation so that this type of activity could be entered into without other business interests and recreational interests suffering. Simply, it was a time for research and broadened understanding of the impacts.
- 10 NCWNZ is disappointed that the period of the moratorium has had little result and that such enterprises are to be re-established when research, and information which could feed into best practice remains absent.
- 11 NCWNZ contends that on-going research is needed to ensure sustainability and to assess the effects of aquaculture on marine ecosystems. Although such monitoring is being considered under the proposed Exclusive Economic Zone Environmental Effects Legislation, placement within The Aquaculture Amendment Act seems more logical.
- 12 Aquaculture has the potential to be more lucrative and a highly achievable industry within New Zealand. Many people support this activity; therefore NCWNZ would wish to see the industry making greater efforts to investigate the short to long term impacts on the environment, both at the local and broader level.

Conclusion

13 The Aquaculture Legislation Amendment Bill (no 3) includes provision for the excellent management of aquaculture operations and maintenance of the high standards for which New Zealand is renowned. As aquaculture expands, however, there is a need for independent surveillance to prevent any deterioration in standards. Just one slack operator can undermine the high reputation achieved by those who are assiduous. NZFGW would like to see that those assigned to monitor operations would also collect data for research, to the double benefit of the industry.

A handwritten signature in blue ink that reads "Elizabeth Bang". The signature is written in a cursive style and is set against a light blue, textured background.

Elizabeth Bang
National President

Dell Panny
**Convener,
Environment Standing Committee**