Aotea: APP139290:Te Tahuna O Atoea Moana Marine Farm Ltd

Requests for Further Information

Email dated 14/3 from Christin Atchinson:

Requests:

- I consider that the biosecurity risk will increase as the farm will present a vector for unwanted organisms and rope will move between regions and as such introduce new species to each area. Can you please comment on the risks and how they can be mitigated?
- 2. To reduce the biosecurity risks, a biosecurity management plan will likely be required. You indicated that you would like to submit on the matters that should be included in such a plan. Can you please provide that information?
- 3. The ecological report refers to on-growing of mussels to 35 mm while the application clearly states that there will be no on-growing only spat catching of spat not visible to the naked eye? Can you please confirm that the application is for spat catching only?
- 4. The application states that DOC had been approached for consultation but DOC preferred to wait until an application was lodge before responding? Has DOC provided a response?
- 5. I no longer have the aerial video you refer to in the landscape assessment undertaken by you and Terewai as Appendix 6 (I believe it was returned to you). If you would like this information to be considered, please resubmit.

Responses to questions raised:

1. Mitigation of Biosecurity Risk:

Mr Dockery, existing farmer in Aotea, has been moving spat to Coromandel for 20 years with no transfer of unwanted organisims so far. Any aquaculture farmer must work under the guidelines of the spat transfer programme.

At an operational level, Mr Dockery, existing famer in Aotea, has advised that: any rope being returned from Coromandel to be placed in the water at Aotea, has been dried, conditioned with brushes for cleaning and left in bags for at least 2 months. There is no chance of any marine organism surviving. Wet or dirty rope is not accepted and all of the Coromandel farmers know of this criteria and comply with it.

Mr White, ecologist, advises that leaving ropes to dry out before reuse will ensure total death of any marine organisms and that 1 month would generally achieve this.

2. Biosecurity Management Plan

The applicant agrees that a Biosecurity Management Plan (BMP) would be appropriately required as a consent condition, subject to the consent being issued.

Biosecurity is a fast moving area of work and we are aware of the work that MPI is doing in this arena for the purpose of supporting the proposed NES Aquaculture. Therefore the ability to have a flexible BMP is supported, as this is mechanism that would allow for change

during the life of the consent (as opposed to specificity being set out in consent conditions that are then less flexible to manage).

The BMP would need to draw on the latest "best practice" guidance available from MPI and/or the Aquaculture Industry and/or any other national advisory material.

We therefore propose that a consent condition such as the following would be appropriate:

Biosecurity Management Plan

- 1. A biosecurity management plan shall include but not be limited to:
 - a. Details of the marine pests, unwanted and notifiable organisms and marine fouling organisms, identified by the Ministry for Primary Industries (MPI), Waikato Regional Council and the marine farming industry, as priority species that are to be identified and recorded.
 - b. Details of the processes which would be applied by farm operation staff to identify, record and report on species identified in (a) as well as any species new to the area. This would include at least the date of observation, organisms observed and extent of infestation.
 - c. Measures that would be undertaken to educate and train farm operation staff on biosecurity requirements and responsibilities.
 - d. Measures that would be undertaken to (i) avoid the introduction, exacerbation and spread of species identified in (a); and (ii) actions that would be undertaken if any new organisms are observed.
 - e. Process, subject matter and timing of reporting to Council.
 - *f. Process and timing for reviewing and updating the biosecurity management plan.*

3. Ecological report

This is to confirm that the application is only for spat catching. The applicant and author of the ecological report understand that the definition of spat used in the Fisheries Regulations is not acceptable to WRC. The explanation of the process to catch spat outlined in the AEE is to be relied on. However, in the case of a toxin event, it should be noted that rope cannot be transferred, until clearance to do so is provided.

4. Consultation with DOC

The proposal was discussed between Terewai Awhitu and DOC Office in Te Kuiti. No concerns were raised and no written reply was received.

5. Aerial Video

We consider that the aerial video is no longer required as it has been superseded by the landscape report undertaken by Mansergh Graham and submitted in support of the application. We do not wish to resubmit this video. Please consider that the reference to Appendix 6 is an oversight and should have been deleted.