

Environmental Protection Agency
New Zealand King Salmon Proposal
Private Bag 63002
Waterloo Quay
Wellington 6140
New Zealand

30th April 2012

Dear Sir,

Objection from GAAIA to King Salmon's expansion plans in the Marlborough Sounds

The Global Alliance Against Industrial Aquaculture ([GAAIA](#)) would like to formally [register opposition](#) to the expansion plans of King Salmon in the Marlborough Sounds. GAAIA supports [Marlborough District Council](#) and [Guardians of the Sounds](#) who have both lodged objections.

GAAIA believes that further expansion of salmon farming in the Marlborough Sounds will inevitably trigger waste pollution, benthic contamination, toxic algal blooms as well as the spread of infectious diseases and mass mortality events. If the history of salmon farming tells us anything at all it is the fact that overproduction causes problems wherever salmon farms operate (read more via '[A Small Fish in a Big Pond](#)').



New Zealand ignores the global warnings at its peril. Permitting salmon farming expansion is an open invitation for disaster and would jeopardise New Zealand's green and clean image abroad. Sanctioning even one new farm (let alone nine farms) in the Marlborough Sounds would be 100% irresponsible.



Lest it forgotten that salmon farming expansion in Big Glory Bay in South Island caused pollution problems in the 1990s (read more via [‘Closing the Net on Sea Cage Fish Farming’](#)). Big Glory Bay was subsequently [named and shamed](#) by National Geographic as one of the world’s top 12 most degraded estuaries in 2005. If salmon farming expansion is allowed in the Marlborough Sounds, then New Zealand’s reputation as a pristine wilderness and tourist destination will inevitably suffer.

“King Salmon has convinced Destination Marlborough that fish farming is compatible with tourism,” wrote Peter Beech of Guardians of the Sounds in [The Marlborough Express](#) (20 March. “Rubbish.”



As The New York Times stated in an [Editorial](#) last year: “Salmon farming is a problem everywhere.” This followed an [article](#) in The New York Times which showed how the disease Infectious Salmon Anaemia (ISA) spread to Chile from Norway.



King salmon in Canada have already been shown to be infected with ISA as well as another devastating disease, HSMI (Heart & Skeletal Muscle Inflammation). Testimony at Canada's salmon inquiry in British Columbia (BC) [revealed](#) in December 2011 that Creative Salmon's King (Chinook) salmon operations in the [Clayoquot Sound UNESCO Biosphere Reserve](#) were disease-ridden (read more via '[Fish Flu Found in Clayoquot Salmon: Dr. Kristi Miller finds ISA virus in Creative Salmon farms](#)').

In fact, the [latest data](#) from the BC Government reveals that mortality rates in King (Chinook) farmed salmon are significantly higher than in Atlantic farmed salmon. Infectious diseases in King salmon farmed in BC are a huge problem with the following fish health events [officially reported](#) in 2010 (the latest data available): Renibacterium salmoninarum Infection, Aeromonas Salmonicida infection, Myxobacterial Infection, Saprolegnia and Trichodina Infection.

In view of the "[unusually high deaths](#)" at King Salmon's farm in Pelorus Sound in March 2012 there may well already be a disease problem for King Salmon. According to [The Marlborough Express](#) (13 March): "Testing by the Ministry of Agriculture and Forestry confirmed the fish were clear of all known viruses and bacterial diseases."

Whether it is an [emerging virus](#) or new disease problem remains unclear. However, expanding production in the Marlborough Sounds will guarantee infectious disease problems (read more via '[Fish Farmageddon: The Infectious Salmon Aquacalypse](#)'). The warning bells are already ringing loud and clear – especially when King Salmon are reluctant to divulge specific details to the public on the extent of their disease and mortality problems; use of chemicals and antibiotics and contaminants in the feed.



King Salmon itself does not rule out disease problems – as well as the use of antibiotics, sea lice chemicals and other medicines. The Marlborough Express [reported](#) (18 April) that:

"In its environmental assessment, King Salmon concedes New Zealand's enviable disease-free status might not last. "In the future, if the need arose ... antibiotics, lice treatments or other animal remedies may need to be added to the feed," the report says."

I visited King Salmon back in 2003 on behalf of the Salmon Farm Protest Group and was alarmed even then at the scale of their operations (read more online [here](#) and [here](#)). As a current resident of Norway, I would like to take issue in particular with misleading comments made by King Salmon's chief executive Grant Rosewarne following his visit to Norway last year.

“The scale of the industry in Norway is amazing and they are yet to have problems with cumulative effects,” he claimed in an interview with [The Marlborough Express](#) in May 2011. “They have a fantastic environment and they've kept it [that way]. There is industry there, but it's just done extremely well” (read more via ‘[Norwegian Salmon Farms Inspire](#)’).

Sorry, the truth is that the Norwegian salmon farming industry is riddled with problems such as sea lice infestation, chemical resistance, infectious diseases, waste contamination and mass escapes. If King Salmon seriously views Norway as a model which must be followed then New Zealand is in deep trouble.

In March 2012, the Office of the Auditor General of Norway published a highly critical [report](#) on the state of the Norwegian salmon farming industry including problems with escapes, sea lice, pollution offences and diseased farmed salmon. This unprecedented public criticism follows a ground-breaking [report](#) last year by the Green Warriors of Norway which exposed the horrors of Norwegian salmon farming (read more via ‘[Norway's Salmon Shame](#)’).

[The Nelson Mail](#) (May 2011) also quoted Mr. Rosewarne saying: “Immediately adjacent to a salmon farm there's lots of baches, the environment looks fantastic. They don't see that as inconsistent with having a salmon farm there. It's low impact and highly reversible.”

Again, King Salmon's view that salmon farming in Norway is ‘low impact’ and ‘highly reversible’ is plain wrong. The fact is that Norwegian salmon farming overproduced to such an extent that it breached the carrying capacity of various fjords – precipitating waste pollution problems as well as infectious disease epidemics (read more via ‘[Report on the Environmental Impact of Farming North Atlantic Salmon in Norway](#)’).

Last year, the Norwegian Hunting and Fishing Association (NJFF) described the situation as “[out of control](#).” In 2010, Janne Sollie, head of Norway's Directorate for Nature Management, demanded a massive rollback of fish farming. “Even a 50-percent production cut might not be enough,” she told [Reuters](#). “The problem is very big, and it is not under control.” In 2011, scientists at Norway's Institute for Nature Research (NINA) [stated](#) that Norwegian salmon farming production may be over six times larger than is sustainable.

Since space in New Zealand is much more limited than in Norway the problem is even greater in the Marlborough Sounds. Put simply, there is nowhere else to go in New Zealand. In Norway, Scotland, Canada and Chile, companies have pursued a policy of unsustainable expansion - so-called ‘[slash and burn aquaculture](#)’. Such shifting cultivation of the sea has seen salmon farms move south in Chile and north in Norway, for example, as companies have fouled their own nests and are forced to move on.

In Chile, [infectious diseases](#) and [sea lice](#) problems in Region X has forced a migration south to Regions XI and XII (read more via ‘[Salmon farms strengthen expansion in southern region](#)’). This week, [Food Safety News](#) reported on the ‘tragedy’ quoting one salmon farmer:

“We have to blame it on our lack of knowledge of the carrying capacity” (read more via [‘Chilean Fish Farms and the Tragedy of the Commons’](#)).



There is only one Marlborough Sounds and once the Malaysian-owned King Salmon has fouled New Zealand’s nest it will simply move on and pollute somewhere else. At home in Malaysia, there is an expansion of land-based fish farming in [closed-containment systems](#). Just last week (28 April), The Straits Times in neighbouring Singapore [reported](#) that “in land-based fish farming, high-tech water treatment protects fish from disease.”

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\$1 million land-based fish farm opens in Lim Chu Kang

Apollo Aquarium's Lim Chu Kang farm will rear groupers

Published on Apr 28, 2012

By Grace Chua

Fish farm Apollo Aquarium on Friday opened a \$1 million plant to rear groupers at its land-based Lim Chu Kang farm.

The 12-tank experimental system, which will rear 300kg to 400kg of fish in each tank, is a method to farm fish on land using high-tech water treatment.

Apollo Aquarium is possibly

In land-based fish farming, high-tech water treatment protects fish from disease and allows more of them to be reared in a tank. -- ST PHOTO: ASHLEIGH SIM

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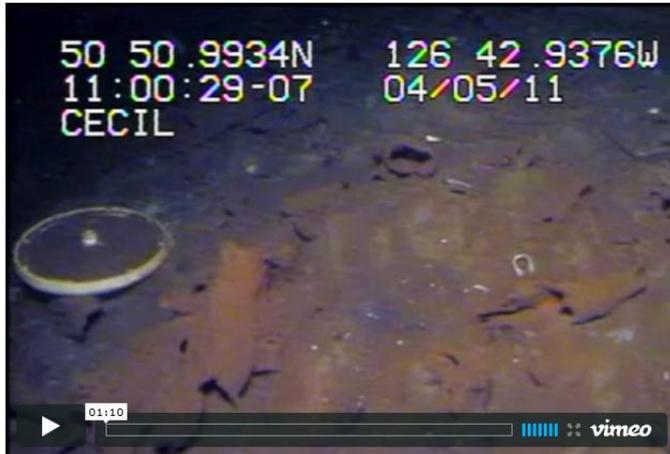
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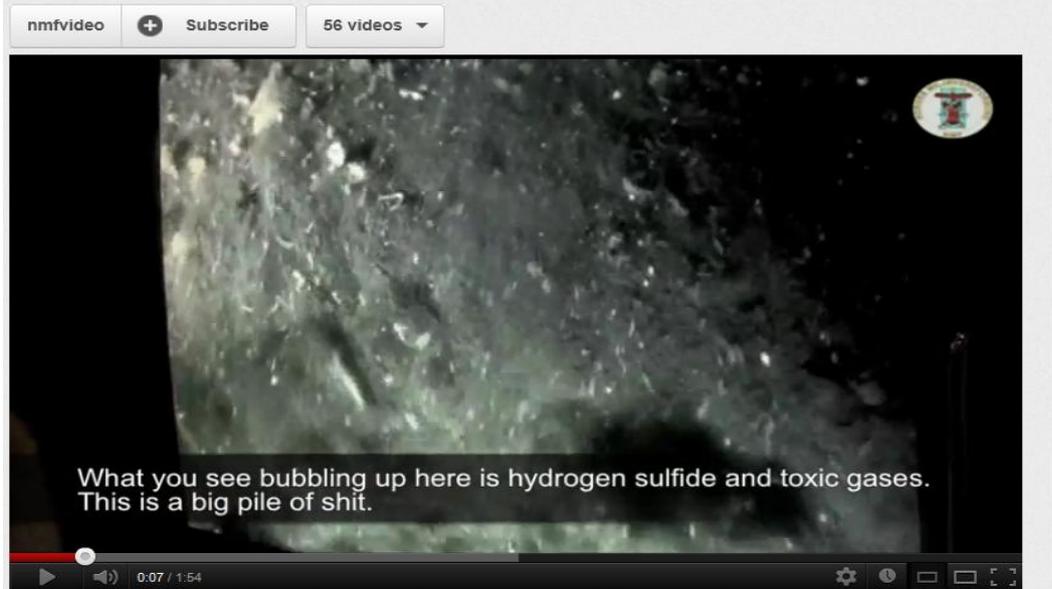
Instead of polluting with impunity in the Marlborough Sounds why doesn't King Salmon farm on land where the wastes can be treated and infectious diseases [controlled](#)?

Video footage from under salmon farms in both [Norway](#) and [Canada](#), for example, reveal how salmon farming creates a marine desert not a marine park.

Video #4: Dead Reef-Building Glass Sponges Under Salmon Farm. Reef-building sponges are extremely slow growing and remarkable fish habitat in BC. The damage from this Cermaq/Mainstream salmon feedlot - owned largely by the Norwegian government - will take hundreds of years to heal if ever.



The Condition Under a Fish Farm in Norway: Lerøy west (English subtitle)



Read more via [‘Shocking New Footage Reveals Devastation Under Salmon Farms’](#)

In 2003, I was shown around King Salmon’s operations by Paul Steere and Stewart Hawthorn. Mr. Hawthorn now works in British Columbia for Grieg Seafood – a company who was [recently charged](#) for nine violations of the Fisheries Act in relation to the deaths of over 50 sea lions. Salmon farms in New Zealand are also lethal for marine mammals (read more via [‘Killing Farms’](#)).



The Marlborough Express reported last year (18 July) that a salmon farmer in Canterbury “admitted charges of possessing an offensive weapon, a galvanised steel pole, in a public place at Ohau Point, and wilfully ill-treating 23 seals by clubbing them to death” (read more via [‘Seal Killer Admits Charges’](#)).

The issue of feed use is also alarming. Some people may not care about their farmed salmon dinner being responsible for the deaths of marine mammals.



However, the use of animal products such as chickens in salmon feed is a serious food safety issue (read more via [‘NZ salmon fed chicken remains’](#)). The Journal of Alzheimer’s Disease reported in 2009 on [‘Mad Fish Disease’](#) and the use of animal products in fish feed. “Fish do very well in the seas without eating cows,” said author Dr. Robert P. Friedland.

The Marlborough Express [reported](#) earlier this month (18 April) that King Salmon already uses a significant quantity of animal products including cows, sheep and chickens: “The fish are fed 1700 to 2000 tonnes of feed a year, he says. Fish meal makes up 10 per cent of protein in feed pellets, but most comes from chicken and also sheep and cattle meat. Of the pellets eaten by the salmon, 20 per cent ends up as faeces, which is an improvement on past conversion rates, Mr Rosewarne says.”

“Nature didn't intend for salmon to be crammed into pens and fed soy, poultry litter, and hydrolyzed chicken feathers,” reported the magazine Prevention last year in an article [‘7 Foods that Should Never Cross Your Lips’](#). “As a result, farmed salmon is lower in vitamin D and higher in contaminants, including carcinogens, PCBs, brominated flame retardants, and pesticides such as dioxin and DDT.”

In fact, a paper in [Science](#) published in 2004 detailed alarming levels of cancer-causing chemicals such as DDT, dioxins, PCBs and toxaphene in farmed salmon. Not surprisingly, given the contaminated nature of farmed salmon feed, contaminants such as PCBs, DDE and PAHs have been detected by pollution agencies under salmon farms in both [Canada](#) and [Scotland](#). The Scottish Environment Protection Agency has also reported [toxic chemicals](#) such as sea lice medicines under salmon farms.

King Salmon [claims](#) that: “Fish farming is a highly efficient use of marine space, taking pressure off wild fish, which are currently being exploited beyond sustainable limits.” Yet it fails to mention the fact that the farming of salmon drains our oceans and leads to a net loss of marine resources (read more via [‘Raising Tigers of the Sea’](#)).

New Zealand has already attracted unwanted media attention in relation to [pollution](#) from the dairy cow industry. “Our lakes and rivers have become polluted by nitrogen from the dairy industry,” wrote Peter Beech of Guardians of the Sounds in [The Marlborough Express](#) (20 March). Dairy farms are no longer allowed to release waste into waterways. Why the double standard?”

Does ‘100% Pure’ New Zealand seriously intend on promoting the pollution from salmon farming as a tourist attraction and natural wonder of the world?



The pollution and contamination from salmon farming may even rival the risks from [oil pollution](#) – and are certainly more preventable. Why take the risk in the first place?



In view of the all King Salmon's bullshit it is not surprising to read in [The Marlborough Express](#) (25 April) that: "Sustain Our Sounds will complain to the Commerce Commission that New Zealand King Salmon is breaching the Fair Trading Act by misleading the public ahead of its application for more farming space in the Marlborough Sounds."

In conclusion, here's what GAAIA thinks about [claims](#) by King Salmon regarding a "strong sense of environmental responsibility" and aim to "lead the world in sustainable, renewable, farmed King salmon resource management" (one for each of the eight new salmon farms proposed):



Read more details via [‘New Zealand’s King-sized Salmon Problem’](#)

The only way to ensure that New Zealand remains ‘100% Pure’ is to remove all the salmon farms in the Marlborough Sounds – not allowing the doubling of production by granting approval for nine new salmon farms.

Yours sincerely,

Don Staniford

Global Alliance Against Industrial Aquaculture ([GAAIA](#))