



OIA23-0524

29 September 2023

Wendy McGuinness
wmcg@mcguinnessinstitute.org

Dear Wendy McGuinness

Thank you for your email of 3 September 2023, requesting information relating to salmon farming management in New Zealand. Your request has been considered under the Official Information Act 1982 (OIA).

Biosecurity New Zealand has been working closely with New Zealand King Salmon to understand the nature of the salmon mortality events, provide technical support for improving on-farm biosecurity practices and provide diagnostic support for ruling out exotic pathogens. The monitoring and auditing of the Controlled Area Notice over New Zealand King Salmon farms, auditing of farms, and their adherence to their Biosecurity Management Plans, are also regularly undertaken by the Biosecurity Response Team.

Biosecurity issues flagged by MPI have been promptly addressed by New Zealand King Salmon through changes in their management practices, fish husbandry to reduce stress on the fish, and quarantine measures (wherever required) to protect stock health.

Your specific questions and my responses to these are outlined below:

Please provide a list (and links) of all MPI publications that research and/or discuss salmon mortalities in New Zealand since the year 2000 (this is broader than just the Marlborough Sounds and should include Stewart Island)? Note: The list should include MPI Technical Paper 2013/19 and Technical Paper No. 2017/39.

It is impractical to provide a full and comprehensive list of all the Ministry for Primary Industry (MPI) publications that research and/or discuss salmon mortalities in New Zealand since the year 2000. However, we can provide links to four publicly available reports. Please find the links below to the documents requested:

- <https://www.mpi.govt.nz/dmsdocument/4094-Salmon-Mortality-Investigation>
- <https://www.mpi.govt.nz/dmsdocument/18253-NZ-RLO-T.-maritimum-2015-Intelligence-Report>
- <https://www.mpi.govt.nz/dmsdocument/10037-Unusual-mortality-rates-in-Marlborough-farmed-salmon-Fact-sheet>
- <https://www.mpi.govt.nz/news/media-releases/mpi-and-salmon-farmers-examine-summer-fish-mortality-issue/>

Provide an update of Table 2 (also found in the Technical Paper No. 2017/39) showing the percentages of mortalities to the year 2022 - by farm, by year, by percentage and by tonnes?

1. *Please also explain what the percentage means in practice (given NZKS move the salmon around).*
2. *Please add the tonnes of dead fish to the updated Table (as requested in Q2 above)? This is due to our concerns that the percentage may not illustrate the true volume of dead fish.*

MPI does not hold any information on marine farm salmon mortalities. Therefore, this part of your request is declined pursuant to section 18 (e) of the OIA as the information does not exist. However, NZKS publish their mortality information as part of their annual report. This report is publicly available and can be found here:

<https://www.kingsalmon.co.nz/wp-content/uploads/2023/03/NZKS-Annual-Report-FY2023.pdf>

Please refer to the Draft biosecurity management plan, submitted to the Marlborough District Council as part of NZKS's resource consent application.

<https://eservices.marlborough.govt.nz/programmes/ListProgrammeEvents?id=3516198>

Please provide a list of all salmon mortalities by landfill location (e.g. Blenheim landfill), by year and by tonnes? Please outline who has provided what information (e.g. MDC or NZKS).

MPI does not hold information on disposals or amounts of disposals of salmon mortalities and there is no mandatory reporting of mortalities as part of the registration of Fish Farms, under the Fisheries Act 1996. Therefore, this part of your request is declined pursuant to section 18 (e) of the OIA as the information does not exist.

As part of a biosecurity response in 2016, after the discovery of Rickettsia-like organism, a Controlled Area Notice (CAN) was put in place around two areas in the Marlborough sounds. In April 2016, to prevent the bacteria from spreading, MPI put legal controls on the movement of salmon and equipment from affected areas. More information on the control measures are set out in a Controlled Area Notice which can be found here: <https://www.mpi.govt.nz/biosecurity/exotic-pests-and-diseases-in-new-zealand/pests-and-diseases-under-response/salmon-response/>

The information on the CAN permits is not held by MPI. Therefore, this part of request is declined pursuant to section 18(g)(i) of the OIA as the information is held by another department (for itself and for a departmental agency hosted by it or an interdepartmental executive board serviced by it) or interdepartmental venture or Minister of the Crown or organisation, or by a local authority

Explain under what circumstances NZKS must advise MPI of salmon mortalities (e.g. is it triggered by a figure in tonnes and/or a new illness in the salmon)? Please provide a link to the document that specifies the threshold/trigger point. Has any circumstance occurred that has triggered NZKS to contact MPI or MPI to contact NZKS since 2015 over mortalities? If yes, please explain. Please specify any questions MPI have asked of NZKS in regard to the recent mortality spikes since 2015 and NZKSs responses?

There is currently no threshold or trigger of salmon mortality that NZKS must report to MPI. However, Section (1) 44 of the Biosecurity Act 1993 states that "Every person is under a duty to inform the Ministry, as soon as practicable in the circumstances, of the presence of what appears to be an organism not normally seen or otherwise detected in New Zealand." Marine farms only have to report mortalities to MPI if they suspect an exotic disease is the cause of fish mortalities.

All freshwater salmon sites are required to give notice, under section 26 of the Freshwater Fish Farms Regulations 1983 'License to give notice of disease', if a farm knows or suspects that fish may be affected by any Category A or Category B disease. The link to the legislation can be found here: <https://www.legislation.govt.nz/regulation/public/1983/0278/7.0/DLM94153.html>

In addition, depending on the site, they may have a specific license condition on notifying MPI if they experience a mortality. Please find attached a fish farm license template <https://www.mpi.govt.nz/dmsdocument/43951/direct>

Since 2015, what work has MPI undertaken to test each farm for the two organisms found in 2015, being NZRLO1 and NZ-RLO2? Please explain who has undertaken what tests, what farm and when?

Since 2015, what work has MPI undertaken to test each farm for other organisms that may cause stress or mortalities? Please explain who has undertaken what tests, what farm and when?

Advise the test results and conclusions in response to (b) and (c) above by NZKS farm.

Please refer to Salmon Mortality Investigation report <https://www.mpi.govt.nz/dmsdocument/4094-Salmon-Mortality-Investigation>. Further information is withheld in full pursuant to the following section of the OIA Section 9(2)(b)(ii) - to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who is the subject of the information.

MPI is satisfied that in the circumstances of this case, the withholding of this information is not outweighed by other considerations which render it desirable in the public interest to make the information available.

Explain MPI's view as to the cause of the three 'recent spikes' (mentioned above). For example, (p. 18, see excerpt below) mentions a number of possible reasons). Do any of the possible reasons explain the current spikes? Are any of those listed been found not to be a potential cause of the recent spikes (if yes, please list)? Have other new potential reasons been found (please explain)?

As noted in the Technical Paper No. 2017/39 "The aetiology of mortality events associated with skin lesions in farmed salmon is complex and multifactorial. Assuming that both *T. maritimum* and NZ-RLOs are ubiquitous in the Marlborough Sounds region and may have been present for some time, the multivariate analysis findings suggest that high water temperatures coupled with an acute drop in feed intake may predispose fish to experiencing unusually high mortality rates."

Please refer to the Draft biosecurity management plan, submitted to the Marlborough District Council as part of NZKS resource consent application.

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The Technical Paper No. 2017/39, in its conclusion, outlines a list of 'possible further work' MPI might consider. Please advise what has been undertaken by MPI in regard to each of the possible workstreams listed?

Please refer to the Draft biosecurity management plan, that was submitted to the Marlborough District Council as part of NZKS's resource consent application.

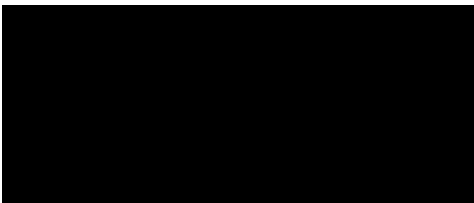
<https://eservices.marlborough.govt.nz/programmes/ListProgrammeEvents?id=3516198>

What actions have been undertaken by MPI to minimise the pain and suffering to the stressed fish in the three recent spikes? Please explain the process/conditions specified by MPI for killing stressed fish and removing the dead fish to the landfall?

The Animal Welfare Act 1999 (the Act) requires owners and people responsible for animals to ensure that the animals' physical, health, and behavioural needs are met, and that appropriate treatment is provided for any ill or injured animals under their care. The Act also applies to farmed fish. Codes of welfare issued under the Act establish minimum standards and recommended best practices for the care and management of particular species, and regulations set clear standards and penalties for offending. There is currently no code of welfare for farmed fish. However, the National Animal Welfare Advisory Committee (NAWAC) has indicated the possible development of a code for farmed fish. NAWAC's work programme can be accessed on the [NAWAC website](#).

Should you have any concerns with this response, I would encourage you to raise these with the Ministry for Primary Industries at Official.InformationAct@mpi.govt.nz. Alternatively, you are advised of your right to also raise any concerns with the Office of the Ombudsman. Contact details are: Office of the Ombudsman, PO Box 10152, Wellington 6143 or at info@ombudsman.parliament.nz.

Yours sincerely



Director, Readiness and Response Services