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Committee Secretariat
Primary Production Committee
Parliament Buildings
Wellington 6011

Submission on Resource Management (Extended Duration of Coastal Permits for Marine Farms) Amendment Bill

Comments

SAFE strenuously opposes this Bill amendment, and express our alarm at the rushed nature of the process which has been tabled under urgency and appears designed to limit public consultation. This Bill aims to bypass checkpoints to assess environmental standards and animal welfare safeguards, thereby removing the appropriate opportunities to reconsider fish health, fish populations and marine environment conditions.

We are extremely concerned about the added negative impacts this bill would provoke. As it stands, marine farms enable destructive factoring farming methods to occur throughout New Zealand's oceans. A blanket extension on current permits for two decades would severely impact the processes established to assess and review the operations of these factory farms under the sea.

Marine farms cannot meet the basic welfare needs of fishes and therefore directly contradict their rights under Animal Welfare Act 1999. Under The Act fishes are recognised as sentient beings, meaning they have the capacity to experience fear, pain, distress, and a sense of well-being. Evidence that fishes are sentient has achieved international recognition in relation to their welfare¹, and it is vital the Animal Welfare Act is enforced as intended to prevent the unnecessary harm and suffering of fishes.

¹ Source; Fish Count UK ([web page](#))

Issues impacting farmed fishes

- **High mortality rates**

Disease, feed issues, reduced oxygen levels, biofouling, and warm water temperatures all contribute to high mortality rates on marine farms.

- **Overcrowding**

High densities of fishes can lead to poor health, lower quality of life, stress, and premature death.

- **Parasites and diseases**

Parasites, viruses and disease can thrive and spread quickly amongst high density fish populations.

- **Skeletal deformities**

Insufficient bone mineralization, high water temperatures, and lack of dietary phosphorus are contributing factors to the significant issue of skeletal deformities on marine farms², which can hinder fishes' ability to swim and feed.

- **Skin lesions**

Skin lesions in farmed fish are frequently related to mechanical trauma, nutritional imbalances, and pathogen exposure.

- **Heat stress**

Fishes can perish when confined in elevated water temperatures, unable to swim to cooler waters.

- **Poor water quality**

High densities of fishes in marine farms can result in lower levels of oxygen, with fishes forced to live in waters contaminated with faeces, ammonia/urine, and uneaten food.

- **Predators**

Where predators have accessed marine farms, confined fishes are unable to perform their natural functions to attempt escape.

- **Stress and depression**

Studies have shown the behaviours and brain chemistry of 'drop out' fishes in marine farms was similar to those seen in stressed and depressed mammals. Unable to cope with constant and inescapable stresses, they essentially give up on life.³

² Source; Global Seafood Alliance ([web page](#))

³ Sources; Royal Society Open Science ([web page](#)) and Animals Australia ([web page](#))



The proposed amendment to the coastal permits for marine farms Bill would lock in 1,200 existing consents for an additional 20 years, allowing operations to continue without the need for review up to 2050. We highlight that marine based activities need to adapt and innovate, rather than be locked into decades-old footprints and practices as the health of oceans and fish populations change over time.

In addition to the negative impacts on fishes, extending blanket consents to all existing marine farms without periodic review would risk significant and possibly irreversible environmental damage. As you will be aware, a healthy ocean is one of the greatest support systems we have for addressing the climate crisis, with fishes living freely playing a vital role in sustaining marine ecosystems. Intensive marine farms keeping unnaturally high numbers of fishes in captivity lead to numerous negative environmental impacts, including nutrient pollution, biodiversity loss, and the release of hazardous chemicals into the marine environment.

SAFE questions how New Zealand could assert a reputation as a sustainable and responsible trading partner if the factory farming of fish is able to operate whilst sidestepping vital checks and balances.

Recommendations

SAFE urges the committee to ensure the Resource Management (Extended Duration of Coastal Permits for Marine Farms) Amendment Bill **does not proceed**. In addition, we urge the Associate Minister of Agriculture (Animal Welfare) to invoke the Animal Welfare Act and ban marine farms outright.

Thank you for your time in reflecting on this submission.

Ngā mihi,

Emily Hall
Campaigns Manager