

**BEFORE ENVIRONMENT SOUTHLAND  
AT INVERCARGILL**

**IN THE MATTER OF A HEARING UNDER S100A OF THE  
RESOURCE MANAGEMENT ACT 1991**

**BETWEEN JIM MAASS-BARRETT & ZANE SMITH**

**Applicants**

**AND TE RŪNANGA o AWARUA, DEPARTMENT  
OF CONSERVATION, MINISTRY FOR  
PRIMARY INDUSTRIES, SANFORD LTD,  
EEC LTD, and BLUFF OYSTER  
MANAGEMENT CO. LTD.**

**Submitters**

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**REBUTTAL EVIDENCE OF ZANE SMITH**

**31 OCTOBER 2019**

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1. My evidence is provided to address navigation in Big Glory Bay and the co-ordinates of the proposed farm sites.
2. During the winter of 2017, I was employed by Rakiura Shipping as a second skipper running the '*Foveaux Freighter*', as I have the appropriate marine qualifications and experience. The main reason I was employed was because Rakiura Shipping was contracted by the Ministry of Primary Industries (MPI) to ship bulk bags of mussels mixed with oysters (the latter supposedly contaminated with the *Bonamia Ostreae* virus) out of Big Glory Bay (BGB) to Bluff, to go into landfill. It was quite a busy time. We often did 2 runs to Bluff per day of around 50 tonnes (50 bulk bags) per load.
3. Foveaux freighter is a decent sized vessel of over 20 metres in length and 42 ton and is capable of carrying in excess of 60 tonnes at a time.
4. The bags out of BGB were usually collected off either the '*Mapua*', EEC's mussel barge, or EEC's dumb barge, or '*Erin*', Sanfords (Mussel barge).
5. At that time of year, when daylight hours were short, the collection of the bags was often done in the dark, from various sites around BGB. The usual changeable weather patterns at this latitude were also a potential issue.
6. I am familiar with BGB as our family has a small hut on a block of family (Maori) land on Bravo Island, which is at the mouth of BGB where in 1860 my great, great grandparents, Yankee & Suzanne Smith, raised a family of 14 children. The neighbouring block of land belonged to Manuel Goomes who raised 21 children around the same time. The Goomes block is now owned by the Cave family – (the 'C' in EEC). our family never traded its block and I will see that it remains in our family indefinitely.
7. I have a strong connection to this area of Rakiura with Bravo Island being at the mouth of BGB.
8. My father was manager of New Zealand Salmon Company from the early beginnings of salmon farming in BGB between 1984 - 1989. I would often stay on Bravo Island with my mother and father while my father worked with NZ Salmon. Having this strong connection with this area is a major part of why I set out with Mr Maass-Barrett to apply for these marine farming sites.

9. I have a very strong connection with Rakiura/ Stewart Island – being of 13th generation of both Maori and European decent. I am (as were my ancestors) fiercely protective of Rakiura & and the surrounding waters.
10. Although I visit Bravo Island often, I don't have the knowledge of where every single mussel line or marine farm structure is that the Sanford skippers do, as they are working around the marine farm structures daily.
11. I did not have any problems manoeuvring a vessel of the size of '*Foveaux Freighter*' into and out of, or around BGB – daylight or dark.

### **GPS CO-ORDINATES**

12. Mr Eriksson talked about the difficulty or confusion of trying to plot the GPS co-ordinates onto a marine chart or on to one of Sanfords vessel's GPS plotters. I do understand this confusion to a degree, as the co-ordinates look similar to the format Mr Eriksson will be used to looking at. One of the sets of co-ordinates is - 47xxxxxx and the other - 122xxxxxx
13. These sets of co ordinates are in NZTM (clearly noted above the GPS co-ordinates), which is a system commonly used by land based organizations such as Environment Southland, other Councils, and Department of Conservation, where as the international standard both for aviation and maritime is the WGS 84 system.
14. With Mr Eriksson's experience being mainly marine, of course he will be well familiar with the WGS 84 system. In WGS84 – the centre of BGB lies at approximately 46' 58 48s, 168' 06 58e.
15. The NZTM co-ordinates being 47 xxxx 122 xxxx s look familiar although 47 S is slightly further south of BGB, but not much further south. 122 E (in WGS84) is well west of 168 E. Mr Eriksson suggests it is somewhere in the Tasman sea. 122E (WSG84) is actually closer to Esperance in Western Australia.
16. The co-ordinates 47 S, 168E identify a point close to the centre of Rakiura /Stewart Is – actually just to the south of BGB. I would assume that Mr Eriksson would be aware that there are other systems of GPS co-ordinates other than that of the WGS 84 system that he's familiar with.

17. It is clear on the map showing the 3 marine farm sites that Mr Maass-Barrett and I are applying for in BGB, where the GPS co-ordinates are printed. Directly above the co-ordinates is printed: COORDINATES (NZTM).
18. It is relatively easy to use a co-ordinate converter on a computer to change co-ordinates from NZTM to WGS 84.
19. Finally, Mr Eriksson talked of the difficulty of "pulling" the salmon farm around BGB when shifting it. I did not hear him say once - "pushing".
20. My first job straight out of school at 17 years old was working for what began as New Zealand Salmon Company, which was later bought out by Regal Salmon. I worked with both of these companies between December 1990 - May 1991.
21. I appreciate that during this time, salmon were farmed in smaller cages than Sanfords now use. Back then we moved cages around as well, yet we nearly always did it with me pushing the cages.
22. Its relatively simple physics that to push anything with such a large restrictive mass beneath the water would be more efficient than to pull it. Propeller wash is counter-productive on the structure being towed unless the tow line is extremely long to avoid the propeller wash I doubt a tow rope so long would be an option considering the present layout of marine farms in BGB.
23. There are obviously factors to take into account that I may not be aware of, such as farm structure strength/integrity at a possible pushing point, etc. The method of pushing is more productive and controllable than pulling in this type of circumstance and may actually be used to some extent. However, my point is that there are other options for manoeuvring salmon cages than what appears to be Sanfords method of 'pulling', and 'pulling' whole farms at once.

Zane Smith