

Bluff Oyster Management Company Limited

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31/07/2019
Environment Southland
Invercargill

To whom it may Concern:

Re: Application for renewal of resource consent ES302167 – Suelen Properties Ltd

The Bluff Oyster Management Company Ltd (BOMC) represents all commercial Quota owners that harvest OYU5 fish-stock.

BOMC has been made aware an application for a renewal / extension of this consent (ES302167 – Suelen Properties Ltd), has been recently submitted.

On 27/03/2019 BOMC emailed Environment Southland (Attn: Matt Hoffman), registering our interest as an “Interested party” with Environment Southland, with regard to any variation or renewal of this consent.

BOMC make the following statements:

- BOMC – as an interested party, have not been consulted, notified about this proposal.
- As a result of the recent biosecurity incursion that detected *Bonamia Ostreae* in farmed stocks in Marlborough and Big Glory Bay Stewart Island, resulting in the Oyster farms being removed, MPI Biosecurity are currently running a process looking at the risks and long term options for flat oyster farming in NZ. This process includes facilitating a Technical Advisory Group (TAG), made up of an international panel of experts to make recommendations on the risks and options going forward. BOMC believe no extensions / renewals of this consent should be considered until this process is complete.
- The new consent application makes no mention of any plans for the consent holder to monitor / test for oyster pathogens (in particular *Bonamia Exitiosa* & *Bonamia Ostreae*), other than surveillance work that is being undertaken by MPI. BOMC believe on-going monitoring and testing of known oyster pathogens must be a condition of any new consent.
- The original consent was issued in the name of Sullen Properties Ltd (Len Lind), and is exclusive to the Consent Holder and not transferable. This

proposed consent requests a change to allow this consent to be able to be transferable. BOMC believe this change should not be permitted as part of a renewal /extension of the existing consent. Changes of this nature should only be considered with a new consent application.

BOMC are not against the principal of farming flat oysters, however we have great concerns about the potential risk to the Foveaux Wild Flat Oyster fishery from the parasite *Bonamia Ostreae* and *Bonamia exitiosa* (the endemic species).

- While the *bonamia ostreae* parasite has not yet been detected in the Foveaux Wild Stock during the current surveillance and monitoring rounds, overseas experiences show that the parasite can lay undetected / dormant for long periods of time, before causing havoc.
- Area's that hold high densities of Oysters provide a potential reservoir of infected particles (from both *Bonamia Ostreae* and *Exitiosa*) during a disease event, which has potential to have a devastating effect on the wild oyster fishery.

The Foveaux Strait Wild Oyster Fishery is NZ's oldest commercial fishery (commercially fished since 1865), is one of the last surviving flat oyster fisheries in the world (due to disease, mainly *Bonamia*), and is an Iconic NZ fish stock. The Bluff Oysters fishery has managed to survive to-date in the presence of *Bonamia exitiosa* (considered to be endemic in the stock), but a co-infection with *Bonamia Ostreae* is likely to have a devastating outcome for the fishery based on overseas experiences. BOMC believe all practical measure's must be taken to ensure the sustainability and survival of the Foveaux Wild Bluff Oyster fishery.

BOMC would respectfully request that no decisions are made with regard renewal or extension of this consent application, until the current MPI Biosecurity process is completed.

I would appreciate if the appropriate person could acknowledge the receipt of the letter.

Yours faithfully

Graeme Wright
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