



Friday, 18 September 2020

Eric Wilson
Secretary
Advocates For The Tongariro River.
117 Taupahi Road,
Turangi 3334

The Minister of Conservation
The Hon Eugenie Sage
Parliament Buildings
Wellington.

Dear Minister

As Secretary of the Advocates for the Tongariro River (AFTR), an Incorporated Society with the aim of preserving the natural Catchment of the Tongariro River and maintaining the river as the best trout fishing river in the world, I am asked to write to you to express our concern at the possibility of trout farming being permitted in New Zealand.

AFTR is concerned that the Primary Production Committee has considered the petition of Clive Edward Baker – Legislation to allow commercial trout farming – and recommends that the Government “give serious consideration to commercialising trout farming.”

AFTR is strongly opposed to trout farming being permitted in New Zealand, on the grounds that it threatens our world acclaimed, high value, recreational wild trout fishery, while providing dubious economic benefits.

Recreational trout fishing is of high value to New Zealand

The current value of New Zealand’s wild trout fishery is estimated to be approximately \$1-1.5 billion dollars, based on the extrapolation of previous estimates by DOC and the Cawthron Institute. The Taupo fishery alone has been estimated at over \$100 million dollars. The value is calculated by spending on licenses, fishing tackle, fishing clothing, hire guides, accommodation or fishing baches, food and beverages, vehicles and family holiday destinations. The fishery supports a large number of jobs, many in rural areas with limited opportunities.

Our wild rainbow and brown trout fishery across numerous streams, rivers, and lakes, adds significantly to New Zealand’s “clean green image”, and is part of the “package” which attracts many high value tourists to New Zealand, with flow on benefits to other tourism sectors. It also has significant intangible value, for the health and enjoyment of New Zealanders.

Trout farming poses risks to our wild trout fishery

The greatest risk is from disease spreading from high density farms or across the border, into wild fish stocks, as experienced in the US, Europe, and South America. New Zealanders are suffering from the spread of the virus Covid 19. We didn't see that, and its impact, coming, nor did we see myrtle rust, Didymo, or Lake Snot, to list a few. The problem with disease is that we don't see it coming, and once introduced, eradication would probably not be successful. As well as disease, there is a high risk of genetic contamination of our wild fish stock, from escaped farm fish.

The risk is also from contaminating our precious fresh water resource. Fish farming can require large amounts of fresh water to stock larger quantities of fish than would be the case naturally, in an enclosed area. The resulting effluent, as in the case of Marlborough Sounds Salmon, then becomes a huge problem and requires the continual movement of the fish farms. The nation's rivers are already under threat.

Some proponents of trout farming claim that trout farms pose no more risk than trout hatcheries. Hatcheries are run by not-for-profit entities working solely in the interests of our fishery. They raise trout fry sourced from wild trout stock in a tightly controlled and non-invasive environment for eventual release back into the wild to live, grow, and breed naturally. It is completely erroneous to compare this to the commercial farming of adult trout in high density pens for maximum yield.

The legalisation of the sale of farmed trout will likely lead to a significant increase in the poaching of wild trout due to the inevitable emergence of a black-market. This could lead to the depletion of wild stock in localised areas.

The economic benefits of trout farming are dubious

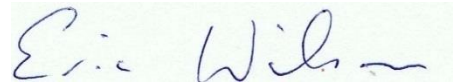
While obviously a matter of personal taste, even the best wild caught trout are not widely acclaimed as a great food fish, unless perhaps smoked, and farmed trout much less so. Members of our organisation have visited trout farms overseas, and reported that the fish were of inferior quality for food, possibly due to their unnatural diet of fish pellets, and that disease was present in at least one of the farms visited. We firmly believe that farmed trout are unlikely to find a significant market in New Zealand, and will need to compete against larger scale established operations in overseas markets.

It is highly unlikely that the revenue from trout farming will be wholly incremental, and to the extent that it substitutes existing profitable salmon and seafood sales, could be dilutive to the broader industry.

Fish farming will not only require significant investment from the private sector, but also from government agencies to regulate, monitor, and deal with resulting issues.

We trust that you will give this submission your due consideration.

Yours sincerely

A handwritten signature in blue ink that reads "Eric Wilson". The signature is written in a cursive style and is set against a light green rectangular background.

Eric Wilson
for The Advocates for the Tongariro River

CC: Hon Kelvin Davis. Minister of Tourism
Hon Jacqui Dean Spokesperson for Conservation
Hon Todd McCly Spokesperson for Tourism