

**From:** Stephen Goodman <Stephen.Goodman@mfe.govt.nz>  
**Sent:** Thursday, 9 April 2026 4:47 pm  
**To:** Aaron.Napier@mfe.govt.nz; Becky.Prebble@mfe.govt.nz  
**Subject:** Re: **CLASSIFICATION** FW: Round Back on CPMG Discussion

Yep makes sense - may have to sequence.

My move is that I draft a CARDDKEY, share with you (Aaron). Then discuss with marine team? Does the manager/GM need to know?

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**From:** Aaron Napier <Aaron.Napier@mfe.govt.nz>  
**Sent:** Thursday, April 9, 2026 10:19 AM  
**To:** Becky Prebble <Becky.Prebble@mfe.govt.nz>; Stephen Goodman <Stephen.Goodman@mfe.govt.nz>  
**Subject:** **CLASSIFICATION** FW: Round Back on CPMG Discussion

Hey Team,

Just sharing this for context, with Minister's changing portfolios we need to take a bit of time on this to get it right for Minister Grigg, it won't be a priority out of the gate with Annual Review coming up and a wider portfolio with budget responsibilities to get across. Nicholas and Steve were open to re-exploring approach and I have some thoughts about how to navigate this and connect it more strongly into Watts portfolio area.

Regards,

**Aaron Napier**

*General Manager, Data and Insights Products*

*Strategy, Stewardship and Performance (SS&P) | Te Hunga Mārama o Te Taiao*

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PA: Charlotte Duns | [charlotte.duns@mfe.govt.nz](mailto:charlotte.duns@mfe.govt.nz)

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**From:** Aaron Napier  
**Sent:** Wednesday, 1 April 2026 4:31 pm  
**To:** Nicholas Smith [EXTERNAL] (Parliament) <Nicholas.Smith@parliament.govt.nz>; Steve Mason [EXTERNAL] (Parliament) <steve.mason@parliament.govt.nz>  
**Subject:** Round Back on CPMG Discussion

Hi Nicholas and Steve,

Thank you again for the discussion today and for the context provided from CPMG. As requested, I've captured below a summary of the key points and agreed actions from our conversation, as well as the outcomes from the recent Ministers' meeting.

### **Summary of Ministerial Actions**

Five actions were agreed at the Ministers' meeting last week:

1. **EPA:** To please provide regular updates on Gigablue's existing trial (recently permitted activity for 50T(?) of product), and updates on the status of the next planned scaled-up iteration of the trial (estimated for October/Nov).  
*Suggest this could be done through fortnightly updates on an ongoing basis, as needed.*
2. **EPA/MfE:** Q: In its assessments so far, what constraints has the EPA identified to the scaling up Gigablue's research activity to the open ocean?  
*E.g. categorisation of the activity under the EEZ (nature/purpose of research), any issues with the methodology and/or particular information gaps regarding the environmental impact.*
3. **EPA/MfE:** Q: Is permitted activity assessment required each time Gigablue scale up its research activities, i.e. is there not one overarching permissive activity for the entire research phase? Is there any pathway for the latter?  
*My understanding is that each time the activity changes (e.g. in scale), it needs to be assessed whether it is permitted or not under the EEZ. This is part of the reason why Gigablue could not proceed with a larger trial in the first instance, and had to scale down.*
4. **MfE:** Provide background on what Gigablue previously sought reg. change for (i.e. specific technology/activity) vs new ask for a wider category exemption (mCFS v. mCDR?)  
*Aaron, as discussed, please provide this via a Weekly Update item (rough ETA for when the team could provide this?)*
5. **MfE:** 9(2)(h) [REDACTED]

These actions have been conveyed to the EPA and circulated to the team for action.

### Further Advice Requested for Ministers

We also discussed the context from CPMG and additional advice that we have been asked to prepare, particularly in relation to:

- Matters of National Interest - including advice on arrangements similar to those in place for the aqua-culture sector, particularly in relation to revenue flows and consideration of the broader climate-related implications/value proposition
- Explanation of how the removals framework could be applied as a useful tool to help address the current situation. As outlined, I believe the broad approach and framework could be used to help clarify next steps for both Ministers and Gigablue even if the fit isn't perfect.

### Ministerial Briefings

We agreed that Minister Patterson should continue to be kept informed as the matter progresses, with the approach to briefing remaining at the discretion of Minister Simmonds office off the back of the EPAs updates and items above.

### Key Action Points

Beyond that which was already agreed out of the Ministers meeting the remaining action for MfE is noted above with respect to advice on:

- Matters of national interest for Minister Simmonds (office to decide regarding on-forwarding to Min Patterson)
- Further advice on how the Removals Framework could support a process with Gigablue

- Aaron to round out with Becky Prebble the actions from Officials this week in relation to the above

Regards,

**Aaron Napier**

*General Manager, Data and Insights Products*

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