

## Response ID ANON-URZ4-5FGD-U

Submitted to Fast-track approval applications

Submitted on 2024-05-03 12:06:08

### Submitter details

Is this application for section 2a or 2b?

2A

#### 1 Submitter name

Individual or organisation name:

Sanford Limited

#### 2 Contact person

Contact person name:

Alison Undorf-Lay

#### 3 What is your job title

Job title:

Industry Liaison Manager

#### 4 What is your contact email address?

Email:

s 9(2)(a)

#### 5 What is your phone number?

Phone number:

s 9(2)(a)

#### 6 What is your postal address?

Postal address:

22 Jellicoe Street, Freemans Bay, 1011, Auckland

#### 7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

### Section 1: Project location

Site address or location

Add the address or describe the location:

Project South is proposed to occur in the open ocean at the south east end of Foveaux Strait. It comprises Five Farming Areas as shown in the attachment.

File upload:

Project South - site address and location 3437-0682-6540 v.1.pdf was uploaded

Upload file here:

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Do you have a current copy of the relevant Record(s) of Title?

No

upload file:

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Who are the registered legal land owner(s)?

Please write your answer here:

The site is located within the common marine and coastal area and therefore is not owned by the Crown or any other person (see section 11(2) of the Marine and Coastal Area (Takutai Moana) Act 2011).

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

N/A

## Section 2: Project details

What is the project name?

Please write your answer here:

Project South

What is the project summary?

Please write your answer here:

Project South is a proposed offshore open ocean King salmon farm of regional and national significance producing at full development 24,000 green weight tonnes (GWT) using five discrete farming areas, in one integrated operation at the south eastern end of Foveaux Strait (see Figure 1 of the Site Address and Location attachment).

The project provides an important contribution to the long-term capability of aquaculture, including meeting New Zealand's objective under the Aquaculture Strategy of increasing its production to \$3 billion by 2035.

What are the project details?

Please write your answer here:

Project: Sanford is proposing a new build, open ocean finfish farm sited in a high energy marine environment at least 10 km from land.

Objective: Project South is a new farm that will enable Sanford to make efficient use of and grow its already significant King salmon business by expanding its production from a 5,500 GWT business (2023) to a 30,000 GWT business over the next five plus years (2030); and together with the grant of Project East consent to a 50,000 GWT business.

Sanford has been farming King salmon since 1993, it wants to use its expertise and existing infrastructure to expand its business, including its fleet of support vessels, expand its freshwater hatchery capacity and replace its ageing processing plant (the hatchery, new processing plant and a second open ocean King salmon from called 'Project East' are all being applied for Fast Tracking, Schedule 2A).

Activities: At the Project South site, Sanford is seeking a coastal permit to undertake marine farming in the open ocean, including the erection and placement of structures and associated disturbance of the seabed, occupation of the coastal marine area, discharge of contaminants to water and various other associated activities.

The site was identified as an ideal site for an open ocean salmon farm because it has suitable water depth, suitable water quality and coastal conditions, avoids sensitive areas, has access to onshore port facilities, yards and staffing and contracting services. The design meets high health and safety standards for staff and will achieve exemplary fish welfare.

At full development Project South will produce 24,000 GWT of King salmon per year across Five Farming Areas. The Farming Areas are discrete from each other, but are in close proximity and are intended to operate as one integrated business. Sanford's existing Big Glory Bay farms in Rakiura Stewart Island will support the new Project South farm.

Sanford has worked with leading global aquaculture companies to design the layout and logistics of the new farm and the pen technology. The individual pens would:

- Be circular structures that operate fully submerged below the water line.

- Be inter-connected by a grid of subsurface lines and moored to the ocean floor using conventional mooring lines and screw and block anchors.
- Be serviced by a centralised barge (likely one per 10 pens), with feed being delivered to each pen via hoses/ pipes.
- Have no walkways connecting the pens.
- Incorporate a winch system which can raise and lower the pen structures through the water column, as required. This would allow the pens to be submerged below the high energy wave environment at all times, and to be lowered deeper during severe storm events.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

It is proposed that the development of each Farming Area would be implemented in five Stages, as follows:

Stage 1 - The development and operation of between 4 and 6 pens at two individual Farming Areas.

Stage 2 - The development and operation of between 8 and 10 pens at the two individual Farming Areas developed during Stage 1.

Stage 3 - The development and operation of between 4 and 6 pens at two other individual Farming Areas.

Stage 4 - The development and operation of between 8 and 10 pens at the two individual Farming Areas developed during Stage 3.

Stage 5- The development and operation of the fifth Farming Area.

The development of individual farming areas in Stages 1 and 2 may occur approximately 12 months apart to ensure a continuity in supply of fish to the market, given that each Farming Area will contain fish from a single year class. This may also occur in Stages 3 and 4.

Each of Stages 1 – 4 will take in the order of five years to complete and are expected to involve the following elements:

- The collection of at least 12 months' pre-development environmental monitoring data at and around each Farming Area.
- Development and operation of each Farming Area.
- The collection and analysis of environmental monitoring data at and around the Farming Area.
- Once all the pens in the Farming Areas in a particular Stage have been fully developed and at least 12 months of environmental monitoring data has demonstrated that the environmental effects of that development are as expected, planning for the next stage of development will be undertaken.

Stage 5 will commence with the collection of at least 12 months' pre-development environmental monitoring data at and around the fifth Farming Area, but given the experience gained during Stages 1 – 4, it is anticipated that all 10 pens would then be able to be developed and operated.

What are the details of the regime under which approval is being sought?

Please write your answer here:

A coastal permit under section 88 of the Resource Management Act 1991.

Approvals under the Fisheries Act 1996, if any.

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Southland Regional Council

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

In 2016 Sanford prepared a strategy to grow its King salmon business, which included a review and development plan for its freshwater hatcheries, existing and new ocean farms (waterspace) and processing capacity.

Step One of the strategy was targeted at maximising the existing Big Glory Bay Stewart Island waterspace asset and included a successful application to increase the 'bay-wide nitrogen' cap and relocation of some of the marine farming sites within Big Glory Bay took four years and has cost **s 9(2)(b)(ii)** in consenting costs. This work has taken the Big Glory Bay production from a 3,200 GWT business to a 5,200 GWT (now) and in the future closer to 6,000 GWT.

Step Two of the 2016 growth strategy has focused on locating and developing two new open ocean farms, this work began in 2017 and has generated a RMA consenting spend to date of **s 9(2)(b)(ii)** – consents are now lodged for two new farms and both applications are posed to go through public notification. Contingent on the grant of the open ocean consents Sanford is also building a new freshwater hatchery that will deliver King salmon smolt at 500 grams or more, to the ocean farms, the design and consenting spend for the hatchery is in excess of **s 9(2)(b)(ii)** to date. In summary the Sanford salmon business has spent **s 9(2)(b)(ii)** on RMA consultants and consenting with three significant hurdles still to be negotiated for the open ocean sites and the hatchery/processing plant, as well as public notification, hearing and the resolution of any appeals.

Specifically on Project South, Sanford lodged a coastal permit application in March 2020. The application is likely to be notified soon.

The above background illustrates that the Fast Track legislation will be a more efficient and cost-effective process, and will enable Sanford to deliver on its 2016 growth strategy and have pens and fish in the water much faster. In particular, the money saved on a protracted process can be invested in base line monitoring, finalising the design and procurement of the pens and vessels

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

N/A

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

Beginning: Upon grant of the coastal permit Sanford will begin the collection of at least 12 months' pre-development environmental monitoring data at and around each of the Five Farming Areas. Pre-development environmental monitoring for Stages 2 and 4 will likely be undertaken as part of the pre-development monitoring for Stages 1 and 3 respectively.

Detailed farm design will also be able to occur within this period. Simultaneously Sanford will bring forward the consenting, construction and build of its new freshwater smolt hatchery (the site has already been acquired) and acquire land for its new build King salmon processing plant – both of these applications are also put forward as Fast Track Schedule 2A. It is anticipated that in-water development begins at year two.

Completion: It is anticipated that each stage of development (plus 5,000 tonnes of production) will take up to five years to achieve and certify, and it will take ~20 years for the project to reach full development.

Milestones:

Milestone One: Post grant of consent Sanford will immediately proceed to the one year environmental baseline monitoring at two of the Farming Areas, while simultaneously conducting in-water trials of the pen design (this is not expected to yield any unexpected results), and finalising the design/lease of the vessels.

Milestone Two: Procurement and delivery of in-water infrastructure and vessel orders for servicing of between 4 and 6 pens at two of the Farming Areas, recruitment of staff, finalising of port infrastructure (South Port in Bluff).

Milestone Three: First intake of smolt to farm, and from then 14 months to first harvest. Initial processing in Bluff at the existing plant until new processing build completed. Begin development of 8 to 10 pens at the two Farming Areas developed during Milestone Two, while concurrently undertaking the environmental base line data for the remaining three Farming Areas.

Milestone Four: The development and operation of between 4 and 6 pens at two other Farming Areas.

Milestone Five: The continued development and operation of the Farming Areas until full development is delivered of between 8 and 10 pens at the five areas.

Funding: Sanford is a publicly listed New Zealand company with an extensive suite of funding arrangements including lease, lease to buy back, joint venture ownership / capital and 100% internally company and share offerings.

### Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Local Authority - Southland Regional Council

Iwi Authority – Te Rūnanga o Ngāi Tahu

Papatipu Rūnanga – There are four papatipu rūnanga whose rohe includes the seascape in which Project South would be located. These are the Awarua, Hokonui, Ōraka Aparima and Waihopai rūnanga – they are the four papatipu rūnanga in the Murihiku area. Sanford has also consulted with Ruapuke Island tangata whenua.

MACA applicants –

- Te Whanau o Topi.
- Landowners of Ruapuke Island Group.
- Te Runanga o Ngāi Tahu.
- Cletus Maanu Paul.
- Jane Mihingarangi Ruka Te Korako on behalf of Waitaha ki Hokianga and Waitaha ki Te Waipounamu (Cletus Maanu Paul has filed a memorandum specifying these claimants be joined to the national application. Jane Mihingarangi Ruka Te Korako, on behalf of Waitaha ki Hokianga and Waitaha ki Te Waipounamu, claims customary marine title over the entire South Island. At the time of preparing the consent application this matter was still being resolved in the Courts. However, out of caution Sanford will treat Ms Te Korako as a representative of a claimant group for the purposes of this application).

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Local Authority - Southland Regional Council ongoing consultation and liaison

Iwi Authority – Te Runanga o Ngāi Tahu, advisory and outreach

Papatipu Rūnanga have been consulted with via the Ngāi Tahu Resource Management Company Te Ao Marama, and directly with Te Rūnanga o Awarua. Discussions have included meetings to discuss the preparation of a Cultural Assessment Impact Report, that is anticipated to be timed so that it would runs concurrently with the call for public submissions on the current consent application. A similar process would be proposed if the project is referred under the fast-track process.

MACA applicants: In accordance with s62(3)(b) of the Marine and Coastal Area (Takutai Moana) Act 2011, prior to lodging the coastal permit application, Sanford notified the groups which have applied for recognition of Customary Marine Title of these applications. At the time of preparing this application, no further dialogue with those parties has occurred.

Sanford has reached out to Rākiura whānau, Rākiura Tītī Islands Committee, the Rākiura Tītī Islands Administration Body, Te Whaka a Te Wera Mātaimai Committee and Rākiura Māori Lands Trustees all of whom have a close connection to the environment in which Project South would be located.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

N/A

#### Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The Ngāi Tahu claim area includes the coastal marine area adjacent to the coastal boundary of the takiwā of Ngāi Tahu Whānui (as per the Ngāi Tahu Claims Settlement Act 1998). This is likely to include the project.

The project interfaces with the Statutory Acknowledgement area for Rākiura/Te Ara a Kiwa (Rākiura/Foveaux Strait Coastal Marine Area). The project is not occurring on land returned under a treaty settlement.

To the extent it can but, at least initially, without the active input of tangata whenua, Sanford has considered the cultural, spiritual, historic, and traditional associations of tangata whenua to this area when planning and assessing the effects of Project South.

This first step has included reviewing the various publicly available information in the Ngāi Tahu Claims Settlement Act 1998 and Te Tangi a Tauira – the relevant iwi management plan for this area; the various RMA planning documents. Sanford has also reviewed the application documents of Ngāi Tahu own proposed marine farm development 'Te Ara a Kiwa'.

Ongoing consultation is further exploring the cultural values in relation to the treaty settlement area.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

No

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary:

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## Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

Sanford commissioned a number of independent technical experts to undertake detailed assessments of the potential effects of Project South, and to provide advice on how those effects could be appropriately managed such that they align with the expectations of the RMA and the relevant statutory planning documents.

The reports include:

- Benthic Environment, Water Quality and General Ecology (Dr Mark James (Aquatic Environmental Sciences Ltd) and Dr Hilke Giles (Pisces Consulting Limited)
- Hydrodynamic Modelling (Dr Neil Hartstein and ADS Environmental Services)
- Nutrient Modelling (Dr Neil Hartstein and ADS Environmental Services)
- Depositional Modelling (Dr Neil Hartstein and ADS Environmental Services)
- Wave Modelling (Dr Neil Hartstein and ADS Environmental Services)
- Biosecurity (Dr Barrie Forrest of Salt Ecology)
- Pathogen Risk, not yet tabled (Dr Gary Knowles of Aquaculture Veterinary Services New Zealand)
- Fisheries and Fish Populations (Dr David Middleton of Pisces Research)
- Marine Mammals (Dr Deanna Clement of Cawthron Institute)
- Seabirds (Wildlife International)
- Landscape, Natural Character and Visual Effects (Frank Boffa)
- Navigation matters (Jason Eriksson)
- Aids to Navigation, not yet tabled (HSE New Zealand)
- Engineering / Mooring System (Dr Mark Porter)
- Planning (Mitchell Daysh Limited)

The key conclusions of these reports confirm the environmental effects of Project South can be managed in a manner which aligns with the expectations of the RMA and planning documents which apply to this area. The full reports can be provided.

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## Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

The NZCPS directs that aquaculture activities in the coastal environment occur in appropriate places and within appropriate limits. The proposed farming of King salmon at the Five Farming Areas constitutes appropriate development in this context.

Water quality at the Five Farming Areas is well suited to effective and efficient farming of King salmon, and the Five Farming Areas are well located, relative to required land-based infrastructure.

The farming activity would be undertaken in a manner which would avoid, remedy or mitigate its adverse effect on the environment and in a manner which is consistent with the expectations of the NZCPS for the protection of environmental values, including its directive provisions which address protection of landscape, natural character and biodiversity, and its directive that a precautionary approach be taken.

This project meets the requirements associated with the national policy statements and national environmental standards, including:

- Contributing to the NZCPS Objective 6 by enabling people and communities to provide for their social, economic, and cultural wellbeing.
- Achieving NZCPS Policy 8 by recognising the significant contribution of aquaculture to the social, economic and cultural wellbeing of people and communities.
- Equally meeting the "protection" provisions of the NZCPS, namely Objectives 1 and 2 and Policies 3, 11, 13 and 15.
- Taking account of the principles of the Treaty of Waitangi through appropriate assessment of cultural values and tangata whenua involvement in the process (Objective 3 and Policy 2).

• Meeting the requirements of the National Environmental Standards for Marine Aquaculture (NES-MA), such as coastal permits allowing the erection, placement, and use of structures associated with the mussel spat hatchery activities; the associated disturbance of the foreshore and seabed; and deposition or discharges in the coastal marine area.

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## Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

Sanford has significant experience in consenting marine farm projects across New Zealand and its experience has shown the many nuances and difficulties and associated time and costs under the standard RMA process. Project South itself has been in the consenting process for several years and has faced significant external and internal delays. In addition, another proposal in the area has faced significant consenting difficulties and this is a key reason why Sanford is pursuing a fast-track referral.

As a project that will enhance aquaculture significantly in New Zealand and that will deliver significant economic benefits to the region and country more widely, Project South will have significant regional and national benefits. As such, it is an ideal candidate for the fast-track process so that it can be processed in a more timely and cost-efficient way. In particular, the fast-track process will ensure that the project has:

- A significantly accelerated consenting process, allowing the project to proceed to development and construction faster and more efficiently;
- Stimulated the economic growth projections more quickly, with the flow on effect of creating 300 new jobs and stimulating the relevant local economies faster; and
- Ensured costs of the project development are capped and maintained at reasonable levels due to its expediency.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

The purpose of the Fast-Track Approvals Bill 2024 is to facilitate the delivery of infrastructure and development projects with significant regional or national benefits in a streamlined manner. It seeks to accelerate approvals for projects that contribute to the overall well-being and growth of communities.

Enabling Project South to proceed under the accelerated process strongly aligns with the purpose and efficient operation of the fast-track process. The project clearly meets the requirements of the Bill for eligibility and referring the project will speed up the delivery of a significant aquaculture project for the benefit of the Southland region and New Zealand more widely.

As outlined earlier in this application, Project South has already been the subject of rigorous environmental assessment, which means the effects and merits of the project will be able to be assessed in future without delays. The purpose, objectives and scope of the project have also already been clearly defined, which will assist future decision-makers in taking a streamlined approach to consideration of the application for the necessary approvals.

The Bill seeks to strike a balance between thorough assessment and getting important projects moving. Project South is extremely well-placed to achieve these imperatives. It will result in significant regional and national benefits in the establishment of aquaculture activity to support and further develop this important industry and deliver significant economic benefits. Project South is therefore highly consistent with the efficient operation of the fast-track scheme.

In addition, Sanford has a proven track record and international reputation in developing and operating successful marine farms across Aotearoa. Sanford is poised to begin its pre-development on-water work and can invest immediately once consent is granted. There can be confidence in Sanford's ability to deliver Project South through this process.

Has the project been identified as a priority project in a:

Central government plan or strategy

Please explain your answer here:

The New Zealand Aquaculture Strategy - to enable aquaculture to be a \$3 billion industry by 2035 and be a more significant part of a lower emissions economy. Maximising the value of existing farms through innovation, by enabling the more efficient use of Sanford existing King salmon assets. The project will increase the volume of high value King salmon products available to the global market, at full development Project South is expected to return **s 9(2)(b)(ii)** year on year.

The New Zealand Aquaculture Strategy identifies that New Zealand's aquaculture industry is well placed to help meet growing international and domestic demand for sustainable and ethically produced seafood. Project South will enable New Zealand seafood exports to make a pivotal contribution to GDP. For more than five years Sanford has actively collaborated with the Government and science industry in identifying and scoping the opportunities and challenges/solutions for delivering open ocean aquaculture – Sanford has shown commitment and willingness to engage and contribute to the Government's priorities and outcomes in this area.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

The infrastructure associated with Project South will deliver significant regional and national benefits.

Project South will provide significant support to the regional and national aquaculture industry in that it represents substantial growth in overall King salmon production. Specifically, the project will expand Sanford's production from a 5,500 GWT business (2023) to a 30,000 GWT business over the next five plus years (2030).

As a result, Project South will also deliver significant economic benefits to the region and country by way of employment during construction and once the project is operational, and GDP growth through the significantly increased production in the short and longer term.

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

As outlined earlier in this application, Project South will contribute to employment and wealth generation in the region and more broadly. Well-functioning urban environments include those in which there is wide and varied access to employment for communities.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

Project South will make a significant contribution to the social and economic wellbeing of people and communities in the Southland region and beyond, through the provision of:

- a sustainable, good health food resource;
- export revenue; and
- the employment and wages it would inject into the economy by both permanent staff and the wide use of local contractors.

Project South would grow more than 300 FTE jobs within Sanford, and more across the wider industry, involving a range of skillsets both on and off water. This includes skilled jobs associated with the farming itself, harvesting, processing, and its hatchery facilities, as well as the employment of people in supporting services. For example Sanford' existing 5,000 GWT King salmon farm in Stewart Island and Bluff spends § 9(2)(b)(ii) on local contractors annually.

At full development Project South is expected to produce upwards of § 9(2)(b)(ii) in annual revenue.

Project South would also contribute positively to the broader development of New Zealand's aquaculture industry. This includes making a significant contribution to delivering the government's Aquaculture Strategy which identifies the potential for aquaculture to move from a \$600 million, to a \$3 billion industry in New Zealand by 2035, and be a more significant part of a lower emissions economy.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

Yes, open ocean salmon farming is essential for growth in the aquaculture industry as it will enable the industry to increase production and scale while delivering high quality premium seafood with a relatively low environmental impact. It is clear from the information outlined earlier in this application that Project South will provide significant support for the aquaculture industry and that it has regional and national significance in this respect.

New Zealand's competitive advantage is its natural marine environment and high quality of water. Aquaculture and in particular salmon farming is well understood and is unlikely to contain any surprises. The adaptive management procedures proposed in the application ensure that the farming systems are responsive.

Will the project support development of natural resources, including minerals and petroleum?

No

Please explain your answer here:

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:



In the development of Project South, Sanford specifically considered climate change related effects and how the project could address climate change mitigation.

Sustainability is at the heart of Sanford's business and its sustainability agenda focuses on six performance outcomes, aligned with our operational processes and long term vision. This includes a commitment to supporting New Zealand's climate change response by setting meaningful targets and actively reducing our energy consumption and emission of greenhouse gases and introducing low carbon solutions within our value chain where practicable.

Specifically as it relates to Project South, moving offshore into cooler ocean waters will enable the production of more King salmon but with a very low carbon footprint and low water use. The project therefore will support climate change mitigation at an industry level as innovation and technology is further introduced across the sector.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

Project South supports adaptation and resilience to risk of climate change effects by moving some of the Sanford King salmon business offshore to cooler waters. This will increase resilience in the case of extreme weather events and global warming.

As outlined earlier in this application, the project has been specifically designed so that it incorporates a winch system which can raise and lower the pen structures through the water column, as required. This will allow the pens to be submerged below the high energy wave environment at all times, and to be lowered deeper during severe storm events.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

As outlined above in the assessment of environmental effects, Sanford engaged an experienced team of expert consultants to consider all potential environmental issues associated with the project. The extensive and thorough assessment of the project by those experts has established that the project can be undertaken in a manner that would appropriately avoid, remedy or mitigate adverse effects on the environment, as directed by section 5 of the RMA and the various aspects of the NZCPS and Southland region's planning documents.

In addition, Project South will enable Sanford to manage its King salmon business through a changing climate. The project will also deliver a healthy sustainable food option that can help feed the world.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

Relevant local and regional planning documents that Project South engages include the Southland Regional Policy Statement and Regional Coastal Plan for Southland.

These planning documents have been comprehensively considered in the consenting process to date. In particular, the relevant provisions of these planning documents were considered when identifying the proposed location for Project South, when assessing the effects of Project South, and in determining how the effects of the activities should be avoided, remedied or mitigated.

In summary, the project will meet and be consistent with all local planning requirements, particularly those provisions which directly address marine farming, and is not a prohibited activity.

Anything else?

Please write your answer here:

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

## Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

Yes

If yes, please explain:

As mentioned earlier in this application, Project South is located in the open ocean coastal environment and will be subject to climate change and natural hazards. However, the project has been specifically designed to reduce and manage these risks.

## Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

Local authority: Canterbury Regional Council

Compliance / Enforcement Action and Outcome: Canterbury Regional Council issued an abatement notice for CRC030315 in relation to fish thaw water discharge from Sanford's Timaru fish processing plant in 2019. Sanford complied with the notice and no further action was taken by Canterbury Regional Council.

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## Declaration

Do you acknowledge your submission will be published on [environment.govt.nz](https://environment.govt.nz) if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Alison Undorf-Lay

Important notes