

Response ID ANON-URZ4-5FQD-5

Submitted to Fast-track approval applications
Submitted on 2024-05-03 13:10:39

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, Auckland, 1011, New-Zealand

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:

The preferred location for this project is in Bluff, more detail can be provided on request.

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

No

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Who are the registered legal land owner(s)?

Please write your answer here:

N/A

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:

Salmon Processing Facility

What is the project summary?

Please write your answer here:

The new salmon processing facility is a greenfield new build with immediate salmon processing capacity of 10,000 Green Weight Tonnes (GWT) per annum. The facility will be designed and staged for future growth to 20,000+ GWT per annum. At the entry capacity of 10,000 GWT the project has significant regional and national benefits.

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 **s 9(2)(b)(iii)** by 2035.

What are the project details?

Please write your answer here:

Project: Sanford is proposing to develop a new salmon processing facility that will replace its ageing existing plant and also have capacity to accommodate other species of seafood processing in lower volumes. Salmon will be the primary species.

Objective: The new salmon processing facility will make a major contribution to aquaculture industry growth by increasing salmon processing capacity including bespoke cuts and added value products. It will enable Sanford to make efficient use of and grow its already significant King salmon business in Southland.

Sanford has been farming King salmon since 1993 and it wants to use its expertise and existing infrastructure to expand its business for the benefit of New Zealand.

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

Please write your answer here:

Pre-requisite (in progress):

- Open ocean Project East and/or Project South salmon farm consent/s applied for and granted
- Year one – Project East salmon farm base line monitoring completed

Stage 1 (~2025)

- Processing plant 'new build' site acquisition – underway
- Facility detail scope of work – underway
- Design sign off

Stage 2 (~2026)

- Consenting 'new build'
- Order equipment

Stage 3 (~2027)

Building commences Stage 4 (~2028)

- Plant commissioned - transition to new facility, initially processing fish from Sanford's existing Glory Bay farms (~5,500 tonnes per annum)
- Receive first harvest from Sanford first open ocean new farm
- Processing site fully operational

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

Please write your answer here:

Resource Management Act 1991
Freshwater Fisheries Regulations 1983

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

Please write your answer here:

Southland Regional Council
Invercargill City Council and/or Southland District 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.

The above background illustrates that the Fast Track will be a more efficient and cost-effective process, and it 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 protracted consenting processes can instead be invested in baseline 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 (2025 - 2026): Upon grant of Sanford's open ocean new farms. Sanford will complete the designs and apply for the all the necessary consents to proceed with the new build facility.

Completion (2028): It is anticipated that full construction and fit-out of the new processing facility will be complete.

Milestones:

Pre-requisite (in process):

- Open ocean Project East/Project South salmon farm consent/s applied for and granted

Milestone 1 (~2025)

- Processing plant 'new build' site acquisition
- Facility detail scope of work
- Design sign off

Milestone 2 (~2026 - 2027)

- Consenting 'new build'

- Build plant
- Order equipment
- Building plant; obtain code of compliance
- Installation and commissioning

Milestone 3 (~2028):

- Transition to new facility, initially processing fish from Sanford's existing Glory Bay farms (~5,500 tonnes per annum) with capacity extended to 10,000 GWT
- Timeline co-ordinated with first fish-in-water at Sanford's open ocean farm Receive first harvest from the open ocean farm
- Processing site fully operational

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Southland Regional Council

Invercargill City Council

Iwi Authority – Te Rūnanga o Ngāi Tahu

Papatipu Rūnanga – there is likely to be on papatipu rūnanga whose rohe extends to the site of the new build factory, which is Te Rūnanga o Awarua.

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:

Consultation has started with initial engagement of Sanford staff and community advising that a new build processing facility is on the mid-term development plan, with the location still to be confirmed. Sanford has also shared its plans with the Southland regional aquaculture group, and Ngāi Tahu.

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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:

Due to the commercial sensitivity of the project highlighting whether and what treaty settlements apply has been withheld at this stage.

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?

Yes

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 has already commissioned several independent technical experts to undertake initial designs of a new build processing plant, and key staff have made site visits to modern salmon processing plants in other places in New Zealand, Tasmania and Norway. These early investigations provide key learning opportunities for understanding the requirements of the build and the likely effects (both adverse and positive).

Building a new processing plant is not anticipated to raise any unexpected adverse effects that cannot be managed - all adverse effects will be avoided, mitigated or minimised so they are appropriately managed and align with the expectations of the RMA and the relevant statutory planning documents.

In summary:

There will be minimal to no adverse effects associated with the land use aspects of the project, it will be a primary production activity on an industrial site, therefore buildings and associated activity (such as traffic and noise) are anticipated in the area. Any necessary design measures, such as screening, will be able to be implemented to manage any potential adverse visual effects.

The effects associated with hazardous substances storage will be less than minor as modern systems are able to be put in place to manage this aspect of the project.

A contaminated land assessment will be established prior to the build so that any effects associated with the disturbance of contaminated soil can be managed in accordance with an appropriate Site Management Plan.

In relation to the water take, an ecological assessment will confirm there will be no more than minor ecology effects.

As much as possible the processing plant will aim for full utilisation of the fish with minimum if any waste; however all required consents will be sought for discharge such as industrial trade waste.

Any solid waste will be disposed of in authorised landfills.

It is expected that all the environmental effects of the new build can be managed in a manner which aligns with the expectations of the RMA and planning documents which apply to this area, resulting in a no more than minor overall effects assessment.

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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:

This project will need to meet 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 new salmon processing facility; 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. Sanford's two open ocean King salmon farm applications, for example, have been in the consenting process for several years and have faced significant external and internal delays.

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, the salmon processing facility 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 more 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 the new salmon processing facility 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 rural Southland, the South Island and New Zealand more widely.

The project will assist to increase the long-term capability of aquaculture to meet New Zealand's objective under the Aquaculture Strategy of increasing its production to **s 9(2)(b)(iii)** by 2035.

In addition, Sanford has a proven track record and international reputation in developing and operating successful marine farms and associated facilities across Aotearoa. Sanford is poised to begin its pre-development work for the project and can invest immediately once consent is granted. There can be confidence in Sanford's ability to deliver the salmon processing plant through this process.

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

Central government plan or strategy

Please explain your answer here:

This project will contribute to:

The New Zealand Aquaculture Strategy - to enable aquaculture to be as **s 9(2)(b)(ii)** industry by 2035 and be a more significant part of a lower emissions economy. The project will increase the volume of high value mussel products available to the global market.

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. The new salmon processing facility 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 new salmon processing facility will deliver significant regional and national benefits.

The infrastructure associated with the new salmon processing facility will deliver significant regional and national benefits.

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

The new salmon processing facility 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:

The new salmon processing facility will provide:

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

The project will contribute to realising the potential of aquaculture to be a s 9(2)(b)(ii) industry by 2035. In particular, the full time employee numbers and the revenue earnings are part of the 300 FTE and s 9(2)(b)(ii) potential at Project East at full development, or the 550 FTE and s 9(2)(b)(ii) earnings from East and South at full development.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

The project is essential for growth in the aquaculture industry as it will enable the industry to increase production and scale while still delivering high quality premium seafood with a relatively low environmental impact. It is clear from the information outlined earlier in this application that the new salmon processing farm will provide significant support for the aquaculture industry and that it has regional and national significance in this respect.

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:

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.

This project 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:

The project will be designed and located so as to minimise climate change and natural hazards risks.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

New Zealand seafood products, and their low emissions footprint, are well placed to establish themselves as a climate-friendly source of nutrition for the global community.

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

Yes

Please explain your answer here:

Southland Regional Policy Statement
Proposed Southland Water and Land Plan
Southland Regional Water Plan
Invercargill City District Plan

This project will meet and be consistent with all local planning requirements.

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:

The project will be subject to climate change and natural hazards but will be appropriately located and designed so as to manage such 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 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