Response ID ANON-URZ4-5FTM-H

Submitted to Fast-track approval applications
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Submitter details

Is this application for section 2a or 2b?

2B

1 Submitter name

Individual or organisation name:
Te Rūnanga o Ngāi Tahu

2 Contact person

Contact person name:
Amelia Dalley

3 What is your job title

Job title:
Senior Strategy Advisor

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:

Te Whare o Te Waipounamu
15 Show Place
Addington

PO Box 13 046
Christchurch 8024
Aotearoa

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

Yes

Organisation:
Stantec New Zealand

Contact person:
Katja Huls

Phone number:
s 9(2)(a)

Email address:
s 9(2)(a)

Job title:
Senior Principal Planner

Please enter your service address:

PO Box 13052, Christchurch 8141

Section 1: Project location

Site address or location

Add the address or describe the location:

The project will be developed within the Coastal Marine Area between Te Waipounamu/The South Island and Rakiura/Stewart Island, on the south-eastern coast of Rakiura/Stewart Island.
This open ocean aquaculture proposal can be successful above seafloor at approximately the 100m contour or less using modern aquaculture technology.

Please refer to Appendix 1 to better understand the project location.

Within this broader area, areas with appropriate conditions will be refined for establishing aquaculture structures and practices. Generally, these need to be located above areas with a sandy seabed, sufficient space for navigation, separation for biosecurity and disease risk management and for the rotation of sites, so that sites can remain fallow for 3 to 6 months after each harvest. High water quality, cool water temperatures and sufficient flow are required, which will require more detailed analysis of local hydrodynamics. The success of the aquaculture operation will also require the operator to relocate structures over time to adapt to changing marine conditions, which may become increasingly relevant with the advent of climate change. The approach to authorising the aquaculture project is designed to provide a sustainable growth pathway which is productive, resilient and inclusive. Access to and use of the open ocean in the area identified above is required to enable investment in more detailed studies and to create flexibility and resilience in the aquaculture operation.

Seabed and water column investigations, farm biosecurity measures, fisheries, seabirds and marine mammals pathway management (pest species management), monitoring and aquatic surveillance will inform specific locations for aquaculture structures.

File upload:
Te Rūnanga o Ngāi Tahu Polyculture Aquafarms Appendix 1.pdf was uploaded

Upload file here:
No file uploaded

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:

The coastal marine area (CMA) is incapable of ownership by the Crown, or any other person. However, the Crown needs to endorse applications in the CMA and Ngāi Tahu, who is also the applicant, must be notified as an applicant under the Marine and Coastal Area (Takutai Moana) Act 2011 and as Mana Whenua.

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:

Te Rūnanga o Ngāi Tahu has made applications for customary marine title and protected customary rights in the Murihiku/Southland coastal marine area, including over the proposed location. The applications have not yet been determined, so there are no customary title holders in the proposed location.

There are Customary Marine Title applications for groups within Ngāi Tahu:
• Ruapuke Island (located between Rakiura/Stewart Island and Te Waipounamu/The South Island) by the landowners of the Ruapuke Island Group.
• The eastern, western and southern coasts of Te Waipounamu/The South Island by Ngāi Tahu Whānui.
• The southern coast of Ruapuke Island by Te Whanau o Topi.
• Green Island by The Pohio Whanau.
It is not expected that these applications will present a barrier to the project, as the applicants are part of the wider Ngāi Tahu rohe.

Section 2: Project details

What is the project name?

Please write your answer here:
Te Rūnanga o Ngāi Tahu Polyculture Aquafarms

What is the project summary?

Please write your answer here:

The project entails establishing polyculture marine farms around the eastern, northern and southern coast of Rakiura/Stewart Island. A discharge permit and coastal permits will be required to authorise the project. The latter involve coastal occupation, structures including moorings and net pens, disturbance of the seabed to install structures, deposition of material on the seabed from marine farming operations (fish faeces and uneaten feed), cleaning of structures and the installation of navigation aids. The project will also entail the introduction of exotic and indigenous fauna to the coastal marine area and the feeding of nutrients to the fauna. Discharges will be from farmed species and waste feed (for fed aquaculture operations).

What are the project details?

Please write your answer here:

Te Rūnanga o Ngāi Tahu (TRoNT) is statutorily recognised as the representative tribal body of Ngāi Tahu whānui. The structure and responsibilities of Te Rūnanga o Ngāi Tahu are outlined in the Te Rūnanga o Ngāi Tahu Act 1996.

The purpose of the project is to expand the Ngāi Tahu asset base and contribute to the economic success of the Rūnanga, provide sustainable food sources for the people of Aotearoa/New Zealand and for export markets to support and sustain the economy. Aquaculture has the potential to remove pressure from wild fish stocks and prevent over-fishing.
Ngāi Tahu has a long-standing and active interest in the protection, and sustainable use and development of coastal waters within the realm of Tangaroa. Ngāi Tahu sees the opportunity for open water aquaculture to sustainably complement New Zealand's wild fisheries resources and contribute to tribal development and welfare. This interest, in combination with the Southland Regional Aquaculture Agreement 2021 under the Māori Commercial Aquaculture Claims Settlement Act 2004 and the future forecast for settlement space under that Act has provided the impetus for the development of the project.

The project is consistent with the wider Te Rūnanga o Ngāi Tahu mandate to build a strong economic base for the iwi and diversifying its current seafood portfolio and growing Ngāi Tahu "Finprint" while demonstrating Ngāi Tahu values in everything that is done. The purpose and objectives of the project are to realise the opportunity for sustainable aquaculture development in the area that will provide for Ngāi Tahu food security, economic development, and employment. In addition the project offers significant economic and employment benefits for the Murihiku/Southland community, is consistent with the Southland Regional Development Action Plan developed in 2017 (which envisages aquaculture as a transformative industry in Southland) and would help to achieve the New Zealand Aquaculture Strategy, particularly its goal to facilitate offshore aquaculture as a way of achieving the desired returns from the industry to the New Zealand economy.

Proposed activities:
Aquaculture entails the placement of structures to create sea pens for finfish or to house shellfish. Oysters use hanging longline subtidal systems. For finfish aquaculture sea pens will have lighting beneath them to manage fish growth and feed and accommodation barges will be established near the sea pens.

The large site area will enable the separation of marine farms from each other to minimise the possibility of disease transfer between generations of marine species in combination with rotational stocking. Sufficient space is also required to allow for adaptive management should changes in technology or market conditions require different farming methods. By applying for an area of preferential occupation (a term defined in the Regional Coastal Plan for Southland) disturbance of biogenic habitat can be avoided by locating farms away from these areas. Marine mammal sanctuaries and exclusion areas have been excluded from the area being applied for.
For finfish aquaculture, to manage the sea conditions large circumference circular pens for the marine farms, such as those produced by various aquaculture suppliers including Akva Group (Norway), Scale AQ. These types of pens are currently in use in dynamic exposed coast and open coast areas such as Storm Bay in Tasmania, Australia and other parts of the world including Norway. Ngai Tahu will also explore the feasibility and suitability to use these areas for new open ocean technology including submersible pens, oil rig technology (Ocean Farm 1) mobile structures (Havfarm), that are presently being used in Norway.

For bivalve marine farming or seaweed aquaculture existing technology in use at offshore sites in New Zealand would be the likely starting point for proposed sites. Over time innovation is likely to lead to new structures that could be used at the sites, subject to an assessment of their potential effects on the environment.

Monitoring and modelling techniques will be used to identify sites that do not generate environmental effects that are more than minor and provide the sustainable and successful production sites.
Finfish farming.

Aside from the occupation of the coastal marine area by structures, the principal activity involved in marine finfish aquaculture is the stocking of net pens and the feeding of the penned fish.
Murihiku/Southland would be one of the most exposed sites in which finfish farming has been undertaken to date in New Zealand. As well as selecting sea pens that will withstand the sea and weather conditions at the proposed site, sea pens and feed barges would be anchored to the seabed, in order to ensure that they will remain in place through poor conditions. A variety of anchoring systems are available for offshore aquaculture operations, with proven performance records internationally. Some minor disturbance of the seabed is likely to occur as part of the installation of the anchoring systems, although any disturbance will be temporary in nature and restricted to the immediate area of each anchor and anchor block (where required).

Marine farming also typically involves measures to deal with fish that die in the cages (deaths of individual organisms, from a variety of causes, are not uncommon in all types of marine farming). Mortalities will be removed from the pen as soon as practically possible after detection, for biosecurity reasons and to minimise attraction of predators such as seals, sea lions and sharks.
To ensure an adequate flow of water through the pens, nets will be cleaned in-situ to remove biofouling. Net cleaning will be carried out as frequently as required to maintain the water quality in the pens and minimise biofouling.

Depending on the technology used, feed barges may be required which would be moored near the sea pens. If required, the barges may be used for onsite accommodation and would have on board staff amenities, control rooms, workshop and maintenance facilities, and mortality processing (ensilage systems) and storage. Both mortalities and human sewage generated on board would be retained and removed to shore for disposal following biosecurity guidance.
Feed barges provide feed to each sea pen by feed blowers that blow feed/pellets through floating pipes to a rotor spreader that distributes feed throughout the pen. Real-time camera monitoring of the water column within the pens allows the feeding response to be monitored, and feed provision adjusted to minimise wastage.

Salmon farming
Salmon is the most commonly farmed fish species in Aotearoa/New Zealand. For salmon farming single year class farming would be implemented at each proposed marine farm. Single year class farming involves the introduction of a single generation (year-class) of fish to a marine farm and their growth from smolt to harvest weight, followed by a fallowing period before restocking of the farm. Single year class stocking on separate farms is recognised as an acceptable solution to manage disease transfer.
Juveniles are introduced to the sea and grown in the net pens up to the required harvest weight. Fish are fed a diet of extruded feed pellets, typically made up of 25% oil and 38% protein (derived from fish meal, land animal proteins and vegetable proteins) with the balance being carbohydrate and vitamins and minerals, this diet varies based on the requirements for different finfish species. Feed is stored on the feed barges and conveyed to the pens using an airflow system (blowers) run from the barges.
As well as the single year class farming marine farms would be stocked in a rotational order to allow for fallowing and to ensure a year round production of fish for market.
Submerged artificial lighting is used in marine farming of salmon to delay the maturation of the fish by removing the trigger provided by shortening daylight hours in nature, but this is not required for other species. Best practice currently is to use LED lights, with the lights submerged at least 5m below the water surface and designed to direct light downwards to the greatest extent practicable. Recent studies at New Zealand King Salmon's Kopāua salmon farm in Pelorus Sound (which has six 640W LED lights installed in each pen) found the illuminated footprint of each light was approximately 3m wide, with measurable light confined to within the pens and a 'slight glow' visible from 10m beyond the pens.

Shellfish farming
Shellfish farming also entails the installation of structures, typically backbone lines anchored to the seabed, with dropper ropes on which shellfish are grown suspended from the backbones. Currently in New Zealand mussel and oysters are farmed, but there is also potential for paua (abalone) farming in appropriate locations and where markets can be established, and other shellfish species are being research in New Zealand for aquaculture. Backbone lines can be held at the surface by floats or installed as fully submerged lines. Successful offshore operations are currently established in Pegasus Bay (Canterbury), Hawkes Bay and the Bay of Plenty so the offshore technology is proven in New Zealand conditions.

Apart from human consumption, shellfish meat can be used to produce aquaculture feed and the shells for nutritional supplements.

Shellfish farming, with the exception of paua farming, does not involve discharges of feed. Shell and live and dead shellfish drop, and pseudofaeces are discharged to the seabed, but are generally contained within the immediate vicinity of the growing lines.

The necessary assessments for the placement of the structures are similar to those for fin-fish farming.

Seaweed and sea cucumbers
Sea cucumbers can be contained in pens beneath finfish and shellfish farms to both feed on the nutrients deposited by them (contributing to environmental outcomes) and to accelerate their growth rate. Seaweed can be established on shellfish farming structures or on specifically designed structures for seaweed aquaculture. Both seaweed and sea cucumbers have good potential for export markets, but further investigation is required to determine if this activity is economically viable. Currently, marketable species of kelp are of Asian origin and there are stringent, but established biosecurity requirements but it can be cultured and harvested safely. Ecklonia radiata has grown well in farming sites in the Marlborough Sounds where there is high water flow .

Native sea cucumber are marketable and present an excellent opportunity for a sustainable polyculture operation.

Other activities
For any marine farming operation, navigation aids will be installed around the farm site. Approval from the Environment Southland Harbour Master will be sought for the specific location of navigation aids including cardinal marks, danger marks, lit special marks. Aids to navigation are likely to be installed as buoys, anchored to the seabed.

In order to undertake marine farming in the proposed location, the following tasks relating to the supporting infrastructure will need to be completed:

• Vessel procurement, outfitting and construction.
• Barge construction and commissioning.
• Mooring, pen and net construction and assembly.

Commercial agreements with suppliers will be entered into for each of these services.
In addition, activities such as the supply of smolt, upgrade of port infrastructure facilities for landing harvested fish, and processing and storage facilities will be associated with the project. Commercial arrangements for the provision of smolt will be entered into.

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

Please write your answer here:

Not applicable.

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

Please write your answer here:

Resource consents are required under the Resource Management Act 1991.

As the project involves aquaculture activities, an aquaculture decision under the Fisheries Act 1996 is also required from the Chief Executive of the Ministry for Primary Industries.

As the project may involve incidental interactions with marine wildlife and bird species (through the species interacting with structures and vessels rather than through direct interference with species by the applicant) a wildlife permit may be required under the Wildlife Act 1953.

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

Please write your answer here:

Environment Southland/Southland Regional Council

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

Please write your answer here:

Not applicable.

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

No

Please explain your answer here:

Because the proposed marine farms are in the Coastal Marine Area, there is no relevant landowner. Ngāi Tahu are tangata whenua, hold ahi kaa, mana whenua mana moana over the proposed site. In fulfilment of its Treaty obligations, the Crown recognises Ngāi Tahu as the tāngata whenua of, and as holding rangatiratanga within, the takiwā of Ngāi Tahu Whānui.There are no relevant applications.

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

Please write your answer here:

From the time consent is granted:

- Habitat mapping, current speed, and wave data collection - 3- 6 months.
- Undertake required assessments and reports, includes additional field work, collect sampling site visits - 12-18 months depending on number of assessments required, details and resource availability.
- Conditions, Monitoring regime and adaptative management plans - 3- 6 months.
- Economic and market feasibility - 3- 6 months.
- Procurement and supply agreements (juvenile fish supply , vessels, barges, pens & nets, mooring systems, other equipment, and processing (If required)) - 12 months
- Vessel, farm, barge construction - additional infrastructure upgrades could be undertaken during this period - 18-24 months
- Farm construction installation - 3- 6 months.
- Operation and harvesting - Harvesting 18-24months after fish are on-site

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

The relevant local authority is Environment Southland.
The relevant iwi authority is Te Rūnanga o Ngāi Tahu.
The relevant treaty settlement entity is Te Rūnanga o Ngāi Tahu.
The are no relevant protected customary rights groups, although Te Rūnanga o Ngāi Tahu has made an application.
There are no relevant customary marine title groups, although Te Rūnanga o Ngāi Tahu has made an application.
Nga Hapu o Ngati Porou will not be affected by the project.
There are no persons with a registered interest in land that may need to be acquired under the Public Works Act 1991 in relation to the project.

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:

The applicant is the relevant iwi authority, the customary title applicant and treaty settlement entity. Discussions have not been had with the local authority.
Ngati Porou does not have an interest in the area being applied for.
Throughout the proposed location the following persons are likely to be affected by the project:
• Papatipu rūnanga of Ngāi Tahu ki Murihiku – Awarua Rūnanga, Waihōpai Rūnanga, Ōraka-aparima Rūnanga and Hokonui Rūnanga;
• Tītī Islands Administering Body
• Tītī Islands Committee
• Te Whaka a Te Wera Mātaitai Committee members
• Rakiura Māori Land Trust
• Maritime New Zealand
• South Port Ltd
• Commercial Fishing Sector representatives – Bluff Oyster Management Company, BC05 Association, Paua Management Action Committee, CRA8, Fisheries Inshore New Zealand

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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:

Not applicable.

Section 4: Iwi authorities and Treaty settlements

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

Please write your answer here:

Ngāi Tahu is a post-Settlement iwi having had its historical grievances heard in the 1980s and 1990s with the Deed of Settlement signed in 1997. Ngāi Tahu is the only iwi with mana whenua status in Murihiku/Southland. The Deed of Settlement, Ngāi Tahu Claims Settlement Act 1998 (NTCSA) and Te Tiriti o Waitangi/Treaty of Waitangi provides the best source of information for explaining how the Treaty Principles are taken into account for the proposed activity in the Ngāi Tahu takiwā.

The Deed of Settlement or NTCSA are not the sole drivers for Treaty Partnership as they have a narrow focus of remedying Treaty breaches that does not consider what was 'not on the table' during historical Treaty negotiations nor the arbitrary restrictions the Crown put on matters such as the number of taonga species allowed to be listed. However, the Deed of Settlement and the NTCSA do create a binding legal relationship between the Crown and Ngāi Tahu that is much broader than simply a contract and includes aspects of beneficial/fiduciary relationship. Ngāi Tahu regards the Deed of Settlement, NTCSA and Te Tiriti o Waitangi/Treaty of Waitangi to be of fundamental constitutional importance.

The relationship Ngāi Tahu has with the natural environment was at the heart of Te Kerēme – the Ngāi Tahu historical claims, and much of the Treaty settlement gives expression to that relationship with te ao tūroa. The Settlement began the process of restoring and recognising Ngāi Tahu place names, history, ownership of taonga, and positions on decision making bodies, such as the New Zealand Conservation Authority. These tools are immensely significant to the iwi as symbolic recognition of whakapapa, but more importantly, allowing Ngāi Tahu to exercise kaitiakitanga.

The NTCSA also includes several mechanisms specifically designed to be used in implementing other legislation such as the RMA and Fisheries Act 1996. These mechanisms legally recognise the importance of natural resources to Ngāi Tahu. The 'ninth tall tree' of Te Kerēme is mahinga kai. Mahinga kai is fundamental to Ngāi Tahu culture, identity, society and economy. Pertinent sections of the NTCSA include:
• Nohoanga
• Customary Fisheries Management
• Taonga Species Management
• Coastal space.

Maori Fisheries Settlement 1992
Māori customary fishing rights were secured and guaranteed by Article 2 of the Treaty of Waitangi 1840 between Queen Victoria representing the English Crown and Māori tribes. Over many years Māori claimed the Crown had breached Treaty fishing rights through a series of actions and the introduction of the Quota Management System (QMS) in 1986, which removed statutory recognition of Māori customary rights to fishing and fisheries, previously secured by S88.2 of the Fisheries Act. The Crown allocated quota (catching rights) as a private property conferring those catching rights in perpetuity. Requests for relief and subsequent judgements through the Waitangi Tribunal (in particular the reports for Ngāi Tahu and the Muriwhenua) and the courts prompted the Crown to enter into negotiations with Māori to resolve Treaty fishing claims over commercial fisheries.
In 1989, the Crown and Māori negotiators agreed on an interim settlement, which was given effect by the Māori Fisheries Act 1989. This interim settlement saw the creation of a Māori Fisheries Commission that progressively received 10 percent of the quota (catching rights) for all fish species that were in the QMS and approximately $10 million to hold and manage on behalf of all Māori. The commission's role was also to promote Māori involvement in the business and activity of fishing. Where the Crown was unable to provide the agreed 10 percent of quota for fish species in the QMS, Māori were provided the equivalent value in further cash.

Commercial fishing claims were finally settled with the signing of a Deed of Settlement (the Sealord Deal) in September 1992. This Deed was given effect through the Treaty of Waitangi (Fisheries Claims) Settlement Act 1992 and saw the creation of the Treaty of Waitangi Fisheries Commission (Te Ohu Kai

Moana), which took over the responsibilities of the Māori Fisheries Commission and enhanced its accountability to Māori.

In the Settlement, the Crown recognise the full extent of Māori customary rights to fishing and fisheries by:
• providing funds for Māori to buy a 50 percent stake in Sealord Products Limited (now Sealord Group Limited) which, as one of the largest fishing companies in New Zealand at the time, was a major owner of fisheries quota
• undertaking to provide Māori with 20 percent of commercial fishing quota for all new species brought within the QMS
• undertaking to ensure the appointment of Māori on statutory fisheries bodies, and
• agreeing to make regulations to allow self-management of Māori fishing for communal subsistence and cultural purposes.

In 1992 The Waitangi Tribunal, which heard the inquiry, recommended amongst other things that the Crown and Ngāi Tahu negotiate a settlement of sea fisheries. As well, the Tribunal recommended a percentage of fishing quota be allocated to Ngāi Tahu, that Te Waihora, Lake Ellesmere, be returned as an eel fishery and marine areas be set aside for mahinga kaimoana (traditional food gathering). Since the 1992 fisheries settlement, Ngāi Tahu has been advocating for its rights in the marine aquaculture sector.

Māori Commercial Aquaculture Claims Settlement
The Māori Commercial Aquaculture Claims Settlement Act 2004 (the MCACSA) provides for the full and final settlement of all Māori commercial aquaculture claims since September 1992. Of particular relevance to the project are the provisions in the MCACSA relating to 'new' space – space in the coastal marine area for aquaculture that has not previously been used aquaculture, with new space defined as space that is consented or forecasted to be consented from 1 January 2011. The MCACSA establishes an obligation on the Crown to provide iwi with aquaculture settlement assets equivalent in value to 20% of all space created for aquaculture development.

Allocation of settlement assets to fulfil the Crown's obligation is done region by region, with new space settlement undertaken through a 'regional agreement', an agreement between the Crown, the Iwi Aquaculture Organisations that represent iwi in a region (Te Rūnanga o Ngāi Tahu in Murihiku) and Te Ohu Kaimoana as the trustee for settlement assets. Aquaculture settlement assets can be:
• 'Authorisations' to develop aquaculture space (noting that authorisations are not resource consents, but give the holder the sole right to apply for a resource consent over that space for marine farming);
• The cash equivalent of the value of the space; or
• A combination of both

While regional agreements are being established, the Minister (currently the Minister of Oceans and Fisheries) can preserve space for meeting the Crown's obligations by notice in the Gazette that an identified area of space in the coastal marine area is an Aquaculture Settlement Area that is required to meet settlement obligations. In gazetting any space the Minister must take into account the suitability of the space for aquaculture activities, and the overall productive capacity of the anticipated new space available for aquaculture activities in each region (s12(4) MCACSA) – that is, the space must be suitable for aquaculture and be likely to be productive in order for the spirit of the Treaty to be adhered to.
In Murihiku, an area of 16.6ha has been gazetted for finfish aquaculture (Notice Declaring an Aquaculture Settlement Area off the North-Eastern Coast of Stewart Island/Rakiura (Southland Region) for the Purposes of the Māori Commercial Aquaculture Claims Settlement Act 2004 (Notice No.: MPI 1255). A regular forecast of future requirements for aquaculture space to be allocated to iwi undertaken by the Ministry for Primary Industries suggests that there will be ongoing provision of settlement space within Murihiku.

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?

Yes

If yes, what are they?:

The Southland Regional Aquaculture Agreement is a Regional Agreement made under the Māori Commercial Aquaculture Claims Settlement Act 2004. Following from extensive negotiations and signed in 2021 it provides Ngāi Tahu marine space to develop aquaculture. The Agreement recognises the rights and interests of Ngāi Tahu to undertake aquaculture within their takiwā. These rights are based within whakapapa, rangatiratanga, mana, and kaitiakitanga. As at the date of this application settlement space of 16.6 ha has been gazetted in Te Ara Kiwa/Foveaux Strait adjacent to the proposed site

for the project (subject to a separate application for inclusion in Schedule 2A of the Fast Track Approvals Bill).

The signing of the Agreement delivers on the Crown's settlement obligations and was viewed by the Crown as a pathway for iwi to undertaking aquaculture and as an integrally involved in the sustainable growth of the aquaculture industry:

"Moving beyond the formal requirements of settlement, the Government's Aquaculture Strategy commits to delivering settlement in a way that meaningfully ensures Māori can make the most of their settlement assets. We as the Crown are making our intentions clear that we want settlement to be a pathway to iwi undertaking aquaculture."
"In relation to the Agreement we have signed today, as rangatira and kaitiaki, it is important that Ngāi Tahu has the opportunity to be integrally involved in the sustainable growth of the aquaculture industry in Aotearoa."

Space gazetted under the Southland Regional Agreement creates a relationship to the Māori Commercial Aquaculture Claims Settlement Act because it will assist Ngāi Tahu in realising the full benefit of the settlement space.

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

No

If yes, please explain:

No, because the applicant is also the holder of customary rights and is acting in accordance with the iwi strategic direction and mandate.

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:

Opportunities for aquaculture have been being considered in Southland since 2013 when Environment Southland embarked on an Aquaculture Zoning Plan. The purpose of the project was to provide overall strategic planning guidance for aquaculture in the Southland region by identifying areas where aquaculture may be constrained by the environment and other unique features or habitats.
Technology has advanced significantly since the time this report was prepared, and new technologies are now commercially available. There is now considerable scope to expand aquaculture activities beyond the conclusions this report reached. An addition, there has been new information collected from wave data which has supported updated modelling. Therefore, the Aquaculture Zoning Plan does not reflect the true potential of this area for aquaculture.

Broken into a Stage 1, Stage 2 and Stage 3A, the project investigated Southland's coastal marine area in an increasing level of detail. In Phase 1 potential opportunities and constraints for marine aquaculture throughout the region were identified. The most significant constraint identified was proximity to conservation areas, followed by exposure to heavy seas and wave action.

Phase 2 took a satellite view of the region's coastal marine area which was provided by the Phase 1 work, and refined it further by looking at specific constraints. In particular, the characteristics of the water column and wave environment, the ecological values in each area, adjacent land uses, and whether mataitai/customary areas and/or marine reserves existed in the vicinity.

In total 52 areas of the Southland coastal marine area were considered and twenty of the areas had significant regulatory or ecological constraints identified (e.g. presence of marine reserves, marine mammal sanctuaries or nationally significant habitat) but 32 areas could be farmed if technological constraints posed by the site or water column characteristics could be addressed.

Phase 3A of the project consisted of an evaluation and ranking of locations that might be worth investigating in further detail for aquaculture proposals. The majority of the top ranked sites are located in areas where marine farming is currently prohibited, and so the report notes that further investigations of these sites would not be warranted unless the regulatory framework was adjusted.

Much of the area proposed in this application was considered in the Phase 2 report of the Southland Aquaculture Zoning Plan. Habitat and current were identified as minor potential constraints, but wind and wave conditions were identified as a potentially significant constraint. However, no area investigated under the Phase 2 was found to be completely free of constraints. For this reason, site specific hydrodynamic assessments are required to refine locations for structures in addition to a dynamic pathway assessment approach so that structures can be moved to adjust to changing wave and current patterns and to specific requirements for species that have economic demand. Evolving technology for offshore aquaculture also means that sites previously considered to be constrained are now able to utilised for aquaculture.

The Phase 2 report for Environment Southland's Aquaculture Zoning Plan (MWH, 2014) provides an outline of the environmental conditions required for salmon farming in Southland, which are reproduced in Appendix 3 and compared to conditions in Te Ara a Kiwa/Foveauz Strait. Conditions in this area are also likely to be reflective of the wider Murihiku coastal marine area covered by this application.

The exposed nature of sites in Te Ara a Kiwa/Foveaux Strait led the Aquaculture Zoning Plan Phase 2 report to note wave height as a potentially significant constraint, and current speed as a potentially minor constraint to aquaculture. The Phase 2 report appears to have been prepared before work undertaken in Marlborough which identified that higher current speeds were better for the mitigation of adverse effects from seabed deposition of material from salmon farming, and prior to technological advancements and international trends to move aquaculture into more offshore and exposed

environments. The pen, net and mooring technology has been advanced also and is more resilient to weather conditions.

Ngāi Tahu does not consider that current speeds in the area are a constraint and are in fact an advantage. In addition, wave height calculated in Te Ara a Kiwa/Foveaux Strait and the wider coastal marine area are now not anticipated to constrain the development of aquaculture in the identified area.

Overall, the proposed site is suitable for aquaculture using the parameters contained in the Phase 2 report for Environment Southland's Aquaculture Zoning Plan. Site specific analysis is required to locate specific structures, which requires substantial investment. Certainty around regulatory approvals is required to advance this investment in the Aotearoa/New Zealand aquaculture industry.

Cultural values
A site-specific cultural values assessment has not been carried out, however, the project is aligned with Ngāi Tahu interests and aspirations. These include the sustainable use and development of coastal waters and providing for current and future generations with food security, economic development and employment. Fisheries rights is a fundamental component of the Treaty of Waitangi and the Deed of Settlement between Ngāi Tahu and Crown. The development of aquaculture has been recognised as a Ngāi Tahu right and interest via the Māori Commercial Aquaculture Claims Settlement Act 2004. Ngāi Tahu is committed to upholding cultural values via technical investigations, monitoring, local development of infrastructure, cultural practices; and iwi wellbeing programmes, education and exemplary project design and execution. The mahi required to achieve this will be collaborative with the Government and local government to ensure success.

Water column
The deposition of fish waste, excess feed and biofouling drop-off and debris from finfish farming can cause phytoplankton growth and changes to the food web and species composition. This can cause effects associated with harmful algal blooms that reduce dissolved oxygen or produce toxins. Conversely, shellfish and seaweed farming can reduce nutrients in the water column. Polyculture, where feed added and non-feed marine species are farmed in close proximity can ensure a balance that reduces the possibility of adverse effects on the water column. For example, where Rori/Kamokamo/sea cucumbers can be cultivated beneath finfish and shellfish farms they will digest nutrients released by the fish and/or shellfish, contributing to their growth and to water quality.

Algal blooms are unlikely to be caused by aquaculture in the project location because the project area is of sufficient size and water depth and has sufficient current to avoid concentrated nutrient enrichment. Organic material will be dispersed readily due to the water depth and currents, enabling the breakdown of these materials. The project location is large enough and has enough variable bathymetry that sites can be chosen and developed to avoid effects. In addition, farms can be moved on a rotational basis to avoid the concentration of nutrients. Allowing farm sites to remain fallow or to be adjusted over time will contribute to the health of the farmed species and the wider environment. The ocean is a dynamic environment, and the larger project area will contribute to a more sustainable aquaculture operation by enabling adaptive management. It isn't practical to develop an economically sustainable farmed fishery where operational management will require amended or renewed permits when changing environmental conditions dictate amended farming practices. In summary, the extent of the project area will contribute to water quality outcomes by enabling sustainable aquaculture operations.

Polyculture can contribute to the management of nutrients.
In addition, the design of cages and structures and feeding practices in combination with water quality monitoring, depositional modelling; and the use of underwater cameras connected to automated feed shut off systems can effectively mitigate the risk of signficant adverse effects on the water column.

Benthic
Marine farming can result in the deposition of organic rich fine-grained particles with high organic content, and shellfish onto the seafloor which can smother seabed communities and/or lead to pollution tolerant species becoming more prolific. These effects can vary greatly between sites, but can be minised by locating marine farms over sandy seafloor that is not particularly sensitive, avoiding vulnerable or special benthic communities, and locating marine farms where there is adequate flushing. The identified area has large areas of sandy seafloor and strong currents to provide flushing. Flushing reduces deposition and provides oxygenation to break down organic material. Further investigations will be carried out to locate farm structures where the benthic effects will be no more than minor.
Sensitive habitats will be avoided so that any potential enrichment of seabed sediments will not generate any effects that are more than minor.

Marine mammal and seabird interactions
Marine mammal sanctuaries have been avoided to minimise interactions with marine mammals in particularly important habitat areas. Further monitoring will be carried out during the project's inception to avoid critical habitat for marine mammals and seabirds, like migration routes, resting and nursery areas and feeding grounds. In addition proper maintenance of the structures, anchors, lines and buoys, and removal of waste material can avoid entanglement risks.
Not all species are sensitive to marine farms, and some are attracted to the habitat the farm structures create. Generally, dolphins and whales are more at risk due to the risk of entanglement and sensitivity to underwater noise. However, marine species have been observed throughout New Zealand foraging and resting within marine farms, so marine farming and marine species are not mutually exclusive in the same location.

For finfish farming, use of appropriate nets (including top nets over sea pens) will exclude sea birds and marine mammals,. It is not expected that seabirds and marine mammals will be affected to a degree that is more than minor because entanglement risk will be managed, and artificial lighting will be designed to avoid effects.

Wild fish interactions
Wild fish can aggregate around finfish marine farms due to the presence of waste feed. Shellfish marine farms provide habitat that fish often utilise as safe areas from marine predators. For finfish farming feed will be carefully monitored to ensure that excess feed is avoided as far as practical. It is not expected that the presence of waste feed will adversely affect wild fish to a degree that is more than minor due to the hydrodynamic environment and the proposed farm management approach, and shellfish structures are likely to provide additional habitat in the area.

Biosecurity

Biosecurity risks are associated with vessel biofouling or ballast water, infected stock and colonisation by pest organisms. The latter may occur from marine vessels or from changes to the environmental conditions around the farm structures.

Good management of the farms can minimise and mitigate biosecurity risks by cleaning and removing pests or infected stock, appropriate disposal of ballast water, appropriate vessel maintenance and an effective monitoring regime.

A monitoring and maintenance regime will be developed to manage biosecurity risks and avoid and mitigate adverse effects. The applicant will work with the Ministry for Primary Industries as necessary to facilitate data collection practices to support marine farming in New Zealand in general. Species specific biosecurity management and response plans will be prepared and complied with where relevant.

Escapee and genetic effects
Transfer of hatchery reared stock or wild caught spat from other locations in New Zealand to wild populations can negatively affect the gene pool of wild fish and shellfish. Technological advances in breeding sterile shellfish stock can avoid these effects.

Heavy metals
Minor leaching of heavy metals may occur from treated timber structures but the effects of this are negligible due to the intent to use plastic and metal structures, high flushing, the likely low amount of leaching and the decrease of leaching over time. Antifouling could be required for vessels and equipment, but it will be used in accordance with best practice.

Hydrodynamics
A large amount of structures in an area could impede currents and wave energy. These effects only remain for the duration of the coastal occupation and do not persist when the structures are removed, although it may take some time for the seabed and sea communities to recover. These effects can be avoided by not locating too many marine farms in close proximity. In the case of this project, the selected area is in open coastal water, has strong currents and is of sufficient size to prevent adverse hydrodynamic affects. As set out above, more detailed assessment will be carried out to determine sites that are hydrodynamically appropriate for both the structures and for avoiding effects on currents and wave energy. These effects can be predicted using monitoring, analytical and modelling techniques.
Generally, the effects associated with finfish cages are less than minor if the cages are sited appropriately.

Lights
Underwater lighting is used in salmon farming to control the rate of maturation of the fish. There are potential effects of artificial lighting on water column biology:
• attraction of phototactic organisms
• vertical migration and benthic settlement
• aggregation and visibility of prey and enhanced predation

Based on experience in Marlborough, Te Rūnanga o Ngāi Tahu anticipates that effects of artificial lighting on the water column will be localised, due to the proposed used of LED lights of relatively low wattage. Experience with these types of lights in Marlborough has shown that they only result in a 'weak glow' in the water, restricted to within 10m of the net pens. Salmon predation of bait fish is likely to be limited as the salmon will be fed appropriately. Strong currents mean larval fish are unlikely to be able to sustain their position in the pens and therefore are unlikely to suffer significant predation. Additional predation on bait fish by fish and marine mammals (such as seals) outside the net pens remains largely a hypothetical effect and has not been observed to date in Marlborough.

Overall therefore, effects of artificial underwater lighting are likely to be no more than minor.

Noise
Noise will be assessed and managed so that compliance with the regional plan is achieved by adjusting equipment and operational management as required.
Sea cucumber farming
Rori/Sea cucumbers can be contained in pens beneath the shellfish and finfish farms and can contribute to environmental outcomes by consuming nutrients and aid with dispersing them back into the water column and oxygenation of sediments. The principal effect associated with this activity is related to the pen structure, which has the potential to impede currents and contribute to scour of the seafloor if not sited and designed correctly.

Studies will be carried out to ensure that placement is appropriate, and monitoring and maintenance regimes will ensure that adjustments to farming practices are carried out to prevent adverse effects.

Seaweed farming
Seaweed can be farmed in conjunction with shellfish farms and like sea cucumbers, have the potential to contribute to environmental outcomes by taking up nutrients released by the farming operation.

Asian kelp can be a pest species, but also has the potential to be a marketable product . Biosecurity guidance is in place to assist with establishing safe farming of this species. Further assessment will be carried out to determine whether this approach is suitable in this location. Farming of native species of seaweed also has potential and will be investigated with site specific analysis.
It is noted that line aquaculture could pose a risk to the Tio fishery due to the risk of Bonamia infections. Comprehensive feasibility studies will need to be undertaken to determine if adverse effects can be mitigated. Te Runanga o Ngai Tahu is aware of the potential risk that line aquaculture could pose to the tio/oyster beds and fishery in Te Ara a Kiwa, and will undertake sufficient feasibility and due diligence assessments to ensure that it can be undertaken while managing any risks.

Landscape and natural character and visual amenity
Sites will be selected to minimise landscape and visual effects. The farm structures will also be spaced appropriately and informed by landscape and

visual effects assessments. Effects on landscape, natural character and visual amenity are anticipated to be no more than minor.

Navigational safety
Navigational safety will be assessed, and designs submitted to the Harbour Master for review and approval. Appropriate engineering design and maintenance can effectively manage navigational risks.

Recreational Values and Public Access
The sea conditions limit recreational activities such as kayaking. Impacts on recreational fishing can be assessed more fully when specific sites are identified for farming structures.

Summary
The most likely effects associated with aquaculture are associated with nutrient deposition and management, interaction with wild species and hydrodynamic effects. These can be managed by careful siting of structures, and the implementation of appropriate monitoring and maintenance plans. Aquaculture has the potential to contribute significantly to the regional and national economy, however the industry is still developing in Aotearoa/New Zealand. For this reason, investment certainty is needed to commission the detailed studies required to establish sustainable open ocean aquafarming operations that can support local food supplies, port operations and export markets.

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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 relevant national policy statement is the New Zealand Coastal Policy Statement 2010 (NZCPS). There are no relevant national environmental standards (the National Environmental Standard for Marine Aquaculture relates only to replacement of consents for existing marine farms).
Policies in the NZCPS address recognition of the relationship that tangata whenua hold with the coastal environment, use of the coastal marine area and the management of adverse effects on ecological values, natural character and landscape, biosecurity, and public access. Te Rūnanga o Ngāi Tahu's assessment of the project in relation to the NZCPS is that:

• The NZCPS recognises the contribution of aquaculture to the social, economic, and cultural wellbeing of people and communities, and sets out an intent that appropriate locations for aquaculture will be identified in regions. As the Regional Coastal Plan for Southland has not yet been reviewed, identification of areas for aquaculture as required by the NZCPS has not yet occurred in Southland. Nevertheless, the project is proposed for an area with water quality suitable for aquaculture.
• Effects on outstanding natural features, landscapes and natural character would be avoided, and indigenous biodiversity would be protected.
• The project will assist Ngāi Tahu and the Southland community to provide for their social, economic, and cultural wellbeing through its contribution to the local economy and the provision of employment.
• Policies in the NZCPS require that the principles of the Treaty of Waitangi and the principle of kaitiakitanga be taken into account in managing the coastal environment. Ngāi Tahu are tangata whenua, hold ahi kaa, and are mana whenua mana moana over the proposed site. In fulfilment of its Treaty obligations, the Crown recognises Ngāi Tahu as the tangata whenua of, and as holding rangatiratanga within, the takiwā of Ngāi Tahu Whānui. The development of the proposed area is consistent with objectives and policies that seek to provide for tangata whenua aspirations. Ngāi Tahu will undertake the activities associated with the project consistent with tangata whenua values for the coastal marine area.
• Potential effects on the seabed and water column are relevant to the provisions of the NZCPS that seek the maintenance of the integrity, form, functioning and resilience of the coastal environment. Significant adverse effects on the seabed and in the water column are not anticipated as a result of the project, and their integrity, form, functioning, and resilience is expected to remain;
• In relation to Policy 11 of the NZCPS a number of marine mammals and seabirds, and one species of shark that are listed as threatened or at risk are found in the area. Risks to these species can be appropriately managed through consent conditions, and implementation of management plans and good practice;A biosecurity management plan will be developed to manage the risks of adverse effects on the coastal environment from a biosecurity perspective;
• Access to and along the coastline will not be affected by the proposal, and on the sea surface the spacing of the proposed marine farms will ensure that access remains available through the proposed site for small recreational vessels, consistent with Objective 4 of the NZCPS.
Overall, therefore it is Ngāi Tahu's opinion that the project is an appropriate use of the coastal marine area that will provide economic, social and community benefits in Murihiku/Southland. While adverse effects are possible as a result of the project, they can all be managed so that the activity is consistent with the relevant policies of the NZCPS and the objectives of the NZCPS are still achieved in Murihiku/Southland.

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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:

The fast-track process is, among other things, focused on projects that contribute to regional development, which this project will do. An appropriate expert panel can make an informed 'one stop shop' decision including authorisations under the Freshwater Fisheries Regulations 1983, The Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 and the Fisheries Act 1996. If approved, the application will give certainty for further investment in Aquaculture by the applicant.

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

Please write your answer here:

An application for aquaculture within the Murihiku coastal marine area will be supported by a wealth of technical information. While time will be necessary for the expert panel to understand that information, Te Rūnanga o Ngāi Tahu will ensure that the assessments are targeted but comprehensive, so that requests for further information can be minimised. A comprehensive set of proposed consent conditions will also be supplied as part of any application for consent. Any application is therefore not considered likely to cause any greater impact on the efficient operation of the fast-track process than any similar large scale project that the Fast Track Approvals Act is designed to provide a consenting pathway for.

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

Central government plan or strategy

Please explain your answer here:

The Government's New Zealand Aquaculture Strategy (2019) identifies offshore aquaculture as one of the key components of delivering an aquaculture industry that has $3 billion in sales by 2035.

The Southland Regional Development Strategy Action Plan (2016), a regional strategy prepared for and endorsed by the Southland Mayoral Forum, representing all four local authorities in Southland, identifies aquaculture as a key contributor to the strategy's aim to diversify the Southland economy, stating that 'Aquaculture is the single greatest opportunity to create a new comparative advantage for Southland on an international scale'

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

The Government's New Zealand Aquaculture Strategy (2019) aims to deliver an aquaculture industry that has $3 billion in sales by 2035. Offshore aquaculture in Murihiku will significantly contribute to this.

Will the project:

Please explain your answer here:

These are not applicable to the project.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

Recent offshore aquaculture projects have been forecast to create between 400 and 1250 employment positions (depending on the scale of the proposal) and between $500 million and over $1 billion in ongoing economic benefits over a 30 year term. A similar level of effect would be anticipated from the Te Rūnanga o Ngāi Tahu Polyculture Aquafarms.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

The project is an aquaculture development project.

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

Yes

Please explain your answer here:

Aquaculture projects utilise the natural resources of the coastal marine area to support the production from aquaculture activities.

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

Yes

Please explain your answer here:

Aquaculture has a low carbon footprint, high protein retention and (for finfish farming) an efficient feed conversion ratio, making it a climate-friendly protein source. Increasing production of protein from marine sources will assist in meeting targets to reduce biogenic methane emissions by 24–47 percent below 2017 levels by 2050.

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

No

Please explain your answer here:

Will the project address significant environmental issues?

No

Please explain your answer here:

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

Yes

Please explain your answer here:

The Southland region does not have a spatial strategy for its coastal marine area. However, in 2013 Environment Southland undertook work on an Aquaculture Zoning Plan which sought to provide overall strategic planning guidance for aquaculture in the Southland region. The Aquaculture Zoning Plan did not result in specific zones being identified for aquaculture, but it did identify areas that could technically be farmed and would be worth investigating further. The proposed project has built on this work and identified a specific location that is technically feasible and does not have constraints in relation to the water column and wave environment, the ecological values in each area, adjacent land uses, and whether mataitai/customary areas and/or marine reserves existing in the vicinity.
The relevant regional planning document is the Southland Regional Coastal Plan (the RCP). The RCP contains a specific chapter on marine farming that recognises the potential for marine farming within the Southland coastal marine area. The RCP notes that 'the Council has opted for a merit-based approach based on a case-by-case assessment of individual proposals, in appropriate locations, taking into account the values of the area within which it is proposed to locate the farming operation and the objectives and policies contained in this Plan'. It is Te Rūnanga o Ngāi Tahu's assessment that the proposed Te Rūnanga o Ngāi Tahu Polyculture Aquafarms is consistent with the provisions of the RCP. The project is not seeking to locate aquaculture activities in any areas of the Murihiku coastal marine area where they would be a prohibited activity, and offshore aquaculture activities generally avoid adverse effects on landscape, natural character, the seabed and water column. Consent conditions and management plans can be used to avoid adverse effects on navigation and on marine species present in the area.

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?

No

If yes, please explain:

Climate change may impact the way the activity is carried out over time, however the project has been designed with climate change resilience in mind. If ocean water temperatures and currents change over time, there is adequate space and variability in hydrodynamic conditions that farm locations can be adjusted to manage the changes.

The carbon footprint of aquaculture is significantly less than that for land-based farming. The Global Salmon Initiative has calculated that the carbon footprint (grams CO_2 equivalent/typical serving of 40g edible protein) of salmon farming is 0.6, compared to 0.9 for chickens, 1.3 for pigs and 5.9 for cows.
There is potential to further reduce the carbon footprint by using modern energy technologies and establishing a New Zealand based feed mill. The latter would provide even more benefit to the New Zealand economy.

The Government's Aquaculture Strategy 2019 notes that research is beginning into how climate change over the next 100 years may affect aquaculture in New Zealand. The project will require the provision of smolt from land-based hatcheries where research is also moving in the direction of production of smolt that can better withstand the effects of climate change.

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:

Not applicable.

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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:
Katja Huls

Important notes