Response ID ANON-URZ4-5FM4-H Submitted to Fast-track approval applications Submitted on 2024-04-29 16:10:44 Submitter details Is this application for section 2a or 2b? 2B 1 Submitter name Individual or organisation name: North Western Mussels Limited 2 Contact person Contact person name: Rebecca Clarkson 3 What is your job title Job title: Principal Advisor, Aquaculture Direct Limited 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:

## s 9(2)(a)

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

Yes

Organisation:

North Western Mussels Limited

Contact person:

Jake Bartrom

Phone number:

s 9(2)(a)

Email address:

s 9(2)(a)

Job title:

Director

Please enter your service address:

# s 9(2)(a)

Section 1: Project location

Site address or location

Add the address or describe the location:

The application is for 700 hectares of new mussel spat nursery space, in four discrete blocks, in the coastal marine area of the Tasman Sea, in the west coast of the Waikato region, at least 3.1 km from the coastline, and generally between Papanui Point in the south and Parikotuku Point in the north. The maps and plans are uploaded as a separate attachment 'NWML Maps and Plans' and set out in Appendix Five of the full application.

The full fast track application with each appendix included is uploaded separately.

File upload:

Appendix Five Maps and Plans.pdf was uploaded

Upload file here:

NWML Fast Track Application May 2024.pdf was uploaded

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

No

upload file:

No file uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

Neither the Crown nor any other person owns, or is capable of owning, the coastal marine area, as set out in the Marine and Coastal Area (Takutai Moana) Act 2011. Applications have been made for customary marine title over the area. There are currently no Statutory Acknowledgement Deeds of Recognition over the application area.

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:

See above.

Section 2: Project details

What is the project name?

Please write your answer here:

Waikato West Coast Mussel Spat Nursery – Critical Industry Infrastructure

What is the project summary?

Please write your answer here:

This application is for a groundbreaking mussel spat nursery off the coast of Whāingaroa/Raglan. The application comprises 700 hectares across four sites and is underpinned by ten years of research and a comprehensive suite of independent expert assessments. It is critical for the viability of mussel farming in the North Island, and nationally significant for New Zealand's Greenshell mussel industry.

What are the project details?

Please write your answer here:

#### 1.0 Purpose

The Waikato Regional Coastal Plan (WRCP) acknowledges the significance of marine farming, including mussel farming, as 'an important industry within the Waikato Region, contributing social and economic benefits to the local, regional and national economy'. Waikato Regional Council has recently adopted its Aquaculture Strategy which anticipates a doubling in industry value by 2044.

In addition, the mussel farming industry has a sustainable growth goal that could contribute up to a third of the Government's goal for aquaculture to be a \$3 billion industry by 2035. To enable this the industry, through its Spat Strategy, is projected to require a 40% increase in spat supply by 2025 and a 70% increase by 2035 - as well as better retain the existing spat supply on the mussel farms.

Spat on-growing and nursery activities are a critical element of the mussel farming industry's operational resilience. It is common practice in the mussel industry to 'hold' the spat that is caught on a spat farm until the optimum conditions have been reached for it to be transferred to the grow out site. Mussel farmers often undertake an intermediate seeding process where they strip the spat from the lines then 'reseed' at the same site, or a site better conditioned for juvenile mussels, prior to the grow out phase. This is called the nursery phase. Depending on a range of conditions it may be beneficial to hold spat up to a maximum of 90 mm (average 50 – 70 mm) in size prior to final seeding on other farms. This optimises resilience and survival rates in transfer to the final growing environment.

The Government recognises the need for new spat nurseries in its 'Agreed Plan for Securing Mussel Spat Supply' and its investment roadmap to accelerate the aquaculture strategy.

However new mussel nurseries are prohibited activities under the WRCP. The plan is being reviewed but the new plan is not expected to be operative for up to ten years.

NWML have invested significant time and resource into progressing a more sustainable source of wild mussel spat. They have monitored spat availability through research permits in the Northland, Auckland and Waikato Regions over the last ten years and have confirmed that the west coast of the Waikato region is unprecedented for the ability to catch and hold plentiful and resilient spat. The characteristics of the proposed location, being the clear, cool, nutrient rich waters of the Tasman Sea, mean that the spat can build up their food sources and increase resilience, effectively fattening them up, so they have much better survival or 'retention' rate when introduced to farming areas.

This proposal offers the mussel farming industry a unique and critical opportunity to access a secure, diverse and resilient spat supply, directly in keeping with the Government's Aquaculture Strategy and the Spat Strategy. Providing for the location as a spat nursery, as well as catch area, will enable the holding of spat in cooler west coast waters over the summer periods so that it can be introduced onto other mussel farms in optimal health and at optimal times for on growing. This will enable year-round productivity and employment.

#### 2.0 Activities

The application is for a new coastal permit for four separate sites off the coast of Whāingaroa/Raglan to catch and seed Greenshell mussel spat (Perna canaliculus), and to grow and harvest Greenshell mussel seed (at an average size of 70 mm and a maximum size of 90 mm), including non-exclusive occupation of 700 hectares of the coastal marine area.

Consent is also sought to allow to install and maintain structures (and replace them as required), to seed, grow and harvest marine farming product from the marine farm (including the discharging of coastal seawater and discharge of biodegradable and organic waste matter) and all other activities that are ancillary to the operation of the farm.

Further detail about the proposed activities is included in the separate attachment 'NWML Activities and Effects' and set out in Appendix One of the full application.

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

Please write your answer here:

Development can commence within three months of the granting of consent, subject to consent conditions. The NWML shareholders have committed funding, the necessary equipment is readily available, and the industry has a critical need for spat.

It is then proposed to implement the project over stages.

A staging development plan (SDP) will be formulated to ensure that appropriate monitoring is in place to inform development of further stages. The SDP includes provision for monitoring of marine mammals and hydrodynamic effects in consultation with relevant experts prior to moving from one stage to the next. Importantly, in recognition that Site D is closest to juvenile Maui dolphin inshore activity during summer, and surf breaks of regional significance, it is proposed to delay that development until after sites A to C.

Further detail about the proposed SDP is included in the separate attachment 'NWML Activities and Effects' and set out in Appendix One of the full application.

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

Please write your answer here:

A coastal permit for aquaculture activities is required under the Resource Management Act 1991 (RMA). New spat nurseries are prohibited activities in the entire Waikato region under the operative Waikato Regional Coastal Plan. Under the RMA an application for a concurrent plan change is required.

Once consent is granted, the Ministry for Primary Industries must make an Aquaculture Decision on the coastal permit under the Fisheries Act 1996 (s186E).

Once consent is granted, the Crown has an obligation to provide settlement assets under the Māori Commercial Aquaculture Claims Settlement Act 2004.

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

Please write your answer here:

The RMA provides for a coastal permit to be granted by the Waikato Regional Council (WRC).

The Minister for Aquaculture may amend regional coastal plans in relation to aquaculture activities in the coastal marine area under sections 360A to 360C of the RMA.

The Minister for Conservation has a role in providing approval of regional coastal plans under Schedule 1 of the RMA. If WRC grants a concurrent plan change application and issues a coastal permit the commencement of the coastal permit is subject to the Minister of Conservation approving the plan change.

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

Please write your answer here:

NWML applied to the Waikato Regional Council on 24 May 2023 for a plan change to the WRCP which seeks to introduce:

- A new zone (Raglan Mussel Spat Catching and Holding Zone) specifically to enable mussel spat catching and mussel spat holding activities over an area of approximately 700 ha off the west coast of the Waikato Region, near Raglan mapped and scheduled as an addition to Appendix 3 of the WRCP;
- · A new policy in Chapter 6 of the WRCP;
- A new rule in Chapter 16 of the WRCP to provide for mussel spat catching and mussel spat holding activities in the new zone as a discretionary activity; and
- Consequential changes to Rules 16.5.1, 16.5.5B, 16.5.5.C and 16.5.6 of the WRCP.

An evaluation in accordance with section 32 of the RMA has been undertaken and concludes that the proposal will more effectively and efficiently achieve the objectives of the WRCP.

Pursuant to section 165ZO of the RMA, NWML also made a concurrent application on 24 May 2023 for a coastal permit for mussel spat catching and mussel spat holding activities in the Raglan Mussel Spat Catching and Holding Zone under the proposed new provisions in the WRCP.

WRC issued a s92 request for further information on 2 February 2024. NWML anticipate providing all additional required information by 30 May 2024.

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

No

Please explain your answer here:

The NWML shareholders have committed funding, the necessary equipment is readily available, and the industry has a critical need for spat.

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

Please write your answer here:

Development can commence within three months of the granting of consent, subject to consent conditions.

Development is proposed to be in stages in consultation with marine mammal and hydrodynamic experts.

Once each stage is approved, construction is proposed to be undertaken 25 lines at a time. As more is learned about the logistics of operating in the west coast environment, adaptations to the construction process and specifications may be made. Timing is also highly dependent on weather conditions and operational logistics.

An indicative timeline is included in the separate attachment 'NWML Activities and Effects' and set out in Appendix One of the full application.

Note that this staged development approach provides multiple opportunities to monitor and manage the activity and innovate to optimise the operation.

## Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

The application is for an area of the coastal marine area which is under the jurisdiction of the Waikato Regional Council. The Waikato Harbourmaster is responsible for maritime safety in the region. Maritime New Zealand provides guidelines to manage navigational safety risks from aquaculture.

There are no Treaty Settlements or statutory acknowledgements currently pertaining to the coastal marine area of the west coast of the Waikato Region:

- The land area north of Raglan is subject to the Waikato-Tainui Raupatu Claims Settlement . Waikato-Tainui have remaining settlement claims, but they do not include the application area .
- The coastal hapū south of Raglan, including hapū associated to Waikato-Tainui and Maniapoto, are currently seeking mandate to progress settlements.
- The Maniapoto Deed of Settlement does not include the application area.

The proposed sites cover the rohe moana of the following lwi/hapū:

- Ngāti Tāhinga (Pukerewa and Weraroa Marae)
- Ngāti Tāhinga (Te Akau Marae)
- Ngāti Mahanga, Ngā Toko Toru, Tamainupo, Tainui-Tāhinga, Ngāti Taiainupo

The Ngā Hapū o Te Uru o Tainui Customary Fisheries Forum was established in 1999 and has responsibility for managing customary non-commercial fishing in the proposed area.

There are no Mātaitai or Taiāpure in the proposed area.

There are twelve applications for recognition or customary marine title pertaining to the proposed area under the Marine and Coastal Area Act. The project is not in any customary marine title area, protected customary rights area, or aquaculture settlement area under s12 of the Māori Commercial Aquaculture Claims Settlement Act or identified within an individual lwi settlement.

The proposal sits within Maui dolphin habitat and the Department of Conservation has a role in the Maui Dolphin Threat Management Plan to manage the dolphin population.

The Waikato mussel farming industry has a critical need for a resilient supply of mussel spat and seed. Pare Hauraki Kaimoana are a key stakeholder in this industry.

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 detail is uploaded as a separate attachment 'NWML Summary of Consultation' and set out in Appendix Two of the application.

Upload file here:

Appendix Two Summary of Consultation.pdf was uploaded

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:

There are no Treaty Settlements or statutory acknowledgements currently pertaining to the coastal marine area of the west coast of the Waikato Region:

- The land area north of Raglan is subject to the Waikato-Tainui Raupatu Claims Settlement . Waikato-Tainui have remaining settlement claims, but they do not include the application area .
- The coastal hapū south of Raglan, including hapū associated to Waikato-Tainui and Maniapoto, are currently seeking mandate to progress settlements.
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Once consent is granted, the Ministry for Primary Industries must make an Aquaculture Decision on the coastal permit under the Fisheries Act 1996 (s186E) which will include an assessment on customary fishing.

Once consent is granted, the Crown has an obligation to provide settlement assets under the Māori Commercial Aquaculture Claims Settlement Act 2004.

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?

Nc

If yes, what are they?:

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

Yes

If yes, please explain:

An assessment of the cultural effects of the activity is uploaded as a separate attachment 'NWML Cultural Effects Assessment' and set out in Appendix Three of the application.

Upload your assessment if necessary:

Appendix Three Cultural Effects Assessment.pdf was uploaded

### Section 5: Adverse effects

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

Please describe:

The resource consent application includes a full assessment of the effects of the proposal which is supported by a range of independent expert assessments and peer reviews.

The likelihood of effects from mussel spat/nursery activities at the proposed locations has been assessed as either appropriate, no more than minor or trivial. The opportunity for social, economic and ecosystem benefits from this proposal to the local community, the Waikato region and New Zealand would be lost if the sites could not be established. It is of national importance to sustain aquaculture by ensuring diversity and resilience of the Greenshell mussel spat supply.

A summary of the effects is included in the separate attachment 'NWML Activities and Effects' and set out in Appendix One of the application.

The combined plan change, and resource consent application including the supporting expert assessments and applicable peer reviews are available on request.

Upload file:

Appendix One Activity and Effects.pdf was uploaded

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 New Zealand Coastal Policy Statement (NZCPS) includes directive policies regarding activities within the coastal marine environment. This includes both the land-side area of any new wharf as well as effects within the coastal marine area (CMA) itself.

In a broad sense this means that:

- Activities cannot have a significant adverse effect on natural character (Policy 13b), landscape/features (Policy 15b) or indigenous biodiversity (Policy 11b).
- Activities cannot have an adverse effect on outstanding natural character (Policy 13a), landscapes/ features (Policy 15a) or significant indigenous biodiversity (Policy 11a).

Policy 8 provides for the recognition of the significant existing and potential contribution of aquaculture to the social, economic and cultural wellbeing of people and communities. Regional councils are directed to provide for aquaculture activities in appropriate places. NWML does not consider that the WRCP currently achieves this, so the plan change application sought to amend the WRCP accordingly.

Activities must also take into account the principles of the Treaty of Waitangi and kaitiakitanga, provide for public access to the coast and management risks from coastal hazards.

Mitchell Daysh provided a Proposed Plan Change and Section 32 Evaluation Report as part of the application to WRC. This included analysis of the proposed plan change against the NZCPS which is included in the assessment of eligibility which is uploaded as a separate attachment 'NWML

Confirmation of Eligibility' and set out in Appendix Four of the application.

The National Environmental Standard for Marine Aquaculture only applies to existing aquaculture so is not relevant.

File upload:

Appendix Four Confirmation of Eligibility.pdf was uploaded

### 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?

Ves

Please explain your answer here:

#### 1.0 Overview

The Waikato Regional Council (WRC) has recently adopted the Waikato Regional Aquaculture Strategy towards Waikato being 'world-class in sustainable and innovative aquaculture management with a doubling of our export growth by 2044'. However, the Waikato mussel industry has a critical need for a sustainable supply of resilient mussel spat and seed and the Waikato Regional Coastal Plan (WRCP) currently prohibits new applications, and therefore spat/seed innovation in the region. The industry cannot remain viable unless this initiative progresses at haste.

#### 2.0 Consistency with the Purpose of the Act

A new 700 hectare mussel spat/seed nursery in the productive and cooler waters of the Waikato west coast will provide regionally significant spat/seed nursery infrastructure to the Waikato mussel industry, thereby ensuring its ability to meet its doubling export value potential.

The need for new spat nurseries has been expressly identified by the Government as a necessary pillar to enable the industry's potential to contribute to Aotearoa's export led economic recovery. This aquaculture project will implement the spat nursery actions of the Government's Aquaculture Strategy and deliver significant benefits to the Waikato region. The NWML spat nursery is the most advanced and by far the most productive of any sea based nursery opportunities.

#### 3.0 Requirement for Fast-Track

Mussel farmers need to be able to respond to the environmental conditions of a given season by catching and moving spat between areas, in much the same way as a terrestrial farmer would move their stock to place them in the most favourable environment. As well as catching spat the industry needs to be able to hold spat, on spat 'nurseries' until resilient enough to move to production farms, otherwise the activity of catching wild spat is not feasible. The Waikato industry has no suitable nursery space available.

NWML have been developing this spat nursery proposal for more than ten years but have been hindered because the activity is currently prohibited under the WRCP. A decision was made in 2021 to progress a concurrent private plan change and resource consent application which was lodged with WRC in May 2023. WRC made a s92 further information request in January 2024 and NWML are responding with this further information.

NWML understands that the private plan change and resource application process may take some years to be resolved at hearing and then may be subject to Environment Court appeals. Aquaculture applications of this nature can take more than ten years and cost millions of dollars. The Waikato mussel industry needs spat now. There is a critical need for this project to be fast-tracked.

An assessment of eligibility is uploaded as a separate attachment 'NWML Confirmation of Eligibility' and set out in Appendix Four of the application.

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

Please write your answer here:

NWML are in the late stages of compiling a response to the WRC s92 request for further information. All necessary information is expected to be available by 30 June 2024 at the latest. This should enable the efficient operation of the fast-track process.

See the assessment of elibility uploaded as a separate attachment 'NWML Confirmation of Eligibility' and set out in Appendix Four of the application.

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

Central government plan or strategy

Please explain your answer here:

The importance of the aquaculture industry was recognised in the Government's 2019 Aquaculture Strategy. Aquaculture has also been recognised by the Government as a key primary sector to accelerate economic growth for the benefit of New Zealand. In response to the COVID-19 pandemic, the primary sector's Fit for a Better World roadmap emphasises the importance of accelerating aquaculture to stimulate sustainable regional growth, as well as leading the way to a more sustainable future economy.

The 2023 Aquaculture Strategy Implementation Plan sought to deliver support for the industry-led spat strategy. Aligned with the industry strategy the Government also has an 'Agreed Plan for Securing Mussel Spat Supply'. This includes a set of actions towards establishing sea-based nurseries. NWML have already undertaken most of these actions, it only remains for Government to provide the regulatory pathway.

See the assessment of elibility uploaded as a separate attachment 'NWML Confirmation of Eligibility' and set out in Appendix Four of the application.

Will the project deliver regionally or nationally significant infrastructure?

Regional significant infrastructure

Please explain your answer here:

The Waikato Regional Council (WRC) has recently adopted the Waikato Regional Aquaculture Strategy towards Waikato being 'world-class in sustainable and innovative aquaculture management with a doubling of our export growth by 2044'. This project will enable regionally significant aquaculture infrastructure that provides economic benefits to the Waikato region.

See the assessment of elibility uploaded as a separate attachment 'NWML Confirmation of Eligibility' and set out in Appendix Four of the application.

Will the project:

Please explain your answer here:

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The project is expected to provide spat for 35,500 tonnes of production mussels which will contribute \$53.2 million in GDP to the Waikato region and 320 jobs. This is sufficient resilient seed to enable the New Zealand Greenshell mussel industry to meet its goal of providing up to a third of the \$3 billion goal that the New Zealand Government set for the aquaculture industry by 2035. The spat nursery itself will employ 28 additional people in the Whāingaroa/Raglan community. Further GDP will be created from the infrastructure investment of at least \$14 million.

See the assessment of elibility uploaded as a separate attachment 'NWML Confirmation of Eligibility' and set out in Appendix Four of the application.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

The significant regional benefits include the following:

- · Mussel spat is identified as a priority in the Government's Aquaculture Strategy including the 'Agreed Plan for Securing Mussel Spat Supply'.
- The proposal will enable regionally significant aquaculture infrastructure that provides economic benefits to the Waikato region.
- The project supports climate change mitigation for the Waikato mussel industry, and mussel farming is known to be a sustainable source of low carbon protein.
- The project is consistent with the policies and objectives of the Waikato Regional Policy Statement, the Waikato Regional Coastal Plan (WRCP), the proposed Waikato Regional Coastal Plan and the Waikato Aquaculture Strategy.

See the assessment of elibility uploaded as a separate attachment 'NWML Confirmation of Eligibility' and set out in Appendix Four of the application.

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:

Aquaculture, like all coastal activities and all farming activities, is particularly susceptible to the effects of climate change and there is recognition that 'adapting to the predicted changes in the short-term while taking mitigation measures in the long-term could be the only way toward sustaining the sector's production'. This proposal is an innovative and direct response to the change in farming conditions which have resulted from the warming waters of the Hauraki Gulf.

This proposal is an important climate adaptation opportunity for NWML, and for the broader mussel farming industry in the Waikato region and will enable the industry to continue to provide positive economic, social, cultural and ecosystem contributions.

Furthermore, farming seafood is one of the most environmentally efficient ways of producing animal protein. A recent study by thinkstep-anz found that New Zealand farmed mussels and oysters have among the lowest carbon footprints of all animal proteins and are similar in impact to plant-based proteins like tofu. This research confirms that New Zealand's aquaculture industry is well placed to be part of our future sustainable, lower emissions economy.

See the assessment of elibility uploaded as a separate attachment 'NWML Confirmation of Eligibility' and set out in Appendix Four of the application. Will the project support adaptation, resilience, and recovery from natural hazards? Please explain your answer here: Will the project address significant environmental issues? 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 proposal has been found to be consistent with the Waikato Regional Policy Statement, the Waikato Regional Coastal Plan, and the proposed Waikato Regional Coastal Plan. It aligns with the Waikato Regional Aquaculture Strategy. See the assessment of elibility uploaded as a separate attachment 'NWML Confirmation of Eligibility' and set out in Appendix Four of the application. 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?

If yes, please explain:

The proposal supports climate change mitigation for the Waikato mussel industry as set out in the 'NWML Confirmation of Eligibility' included in Appendix Four of the application. Greenshell mussels are a sustainable, nutritious and low carbon protein food.

# 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:

Gulf Mussel Farms is a family run mussel farming venture based in the Hauraki Gulf. Allan and Jane Bartrom first set up an experimental farm in 1988 and have been developing their operation ever since. Their son Jake now runs the day to day activities, having grown up around the aquaculture industry, and knows what goes into producing the world's best seafood - and the tremendous opportunity it offers New Zealand to generate export earnings and create green, Kiwi jobs.

Gulf Mussels has four mussel farms and leases and manages several others in the region, bringing economic value into the local community and employing up to 25 local residents. The Bartroms have made a substantial investment into the operation, returning a high proportion of the total value into the local economy. Gulf Mussels operate mussel farms for the Pare Hauraki Fishing Trust, with a long-term contract growing agreement to farm 126 hectares in Group A, and 32 hectares in Group B, in the Firth of Thames.

Gulf Mussel Farms carries out their operation in accordance with environmental best practice including the A+ Sustainable Management Framework for Greenshell Mussels . Each of the partner companies of NWML have a clean track record with no instances of compliance or enforcement actions taken by any entity with enforcement powers under Acts referred to in the Bill.

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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: Rebecca Clarkson

Important notes