Response ID ANON-URZ4-5FXB-A
Submitted to Fast-track approval applications Submitted on 2024-05-02 22:21:45
Submitter details
ls this application for section 2a or 2b?
2A
1 Submitter name
Individual or organisation name: ImpactMarine Bluff Limited
2 Contact person
Contact person name: Aaron McCAllion
3 What is your job title
Job title: Director
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?
No
Organisation:
Contact person:
Phone number:
Email address:
Email address: Job title:
Job title:
Job title: Please enter your service address:

250 Ocean Beach Road

Bluff New Zealand File upload:

Map of Fish farm Area for IMPACTMARINE BLUFF LIMITED.pdf was uploaded

Upload file here:

2023-03-21 ImpactMarine Bluff- Chinook Salmon Farm - Concept[4618].pdf was uploaded

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

Yes

upload file:

250 Ocean Beach Road Titles.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

South Island Industrial Fund Limited

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:

Impact Marine Bluff Limited has a legally binding lease agreement with South Island Industrial Fund, granting us exclusive rights to utilise the land on which the proposed project will occur. This lease agreement establishes our legal interest in the land, providing us with the necessary authority and entitlement to undertake the project activities outlined in the proposal.

The nature of our legal interest in the land significantly impacts our ability to execute the required work for the project. As the lessee, we have the legal right to access, occupy, and utilize the land for the duration specified in the lease agreement. This includes the freedom to initiate construction, conduct necessary site preparations, and implement any infrastructure or development activities essential for the project's completion.

Furthermore, our legal interest in the land ensures that we have the necessary legal standing to obtain permits, licenses, and approvals from relevant authorities for the proposed project. It provides assurance to stakeholders, including investors, partners, and regulatory bodies, that we possess the requisite rights and permissions to carry out the intended activities on the specified land parcel.

In essence, our lease agreement with South Island Industrial Fund establishes a solid legal foundation for our involvement in the project, enabling us to undertake the required work with confidence and compliance with applicable laws and regulations.

Section 2: Project details

What is the project name?

Please write your answer here:

Impact Marine: Sustainable and Climate-Resilient Aquaculture on Land in Southland

What is the project summary?

Please write your answer here:

IMPACTMARINE (BLUFF) LIMITED plans to invest § 9(2)(b) in Southland to develop a Land Based RAS (Recirculatory Aquaculture System) Salmon Farm on 10Ha of Land in Bluff. The project encompasses hatchery, smolt, grow out and processing facilities.

What are the project details?

Please write your answer here:

Project Overview:

The proposed project aims to establish a state-of-the-art RAS (recirculating aquaculture systems) land-based salmon farm in Bluff, Southland. This innovative facility will leverage cutting-edge technology to rear salmon in a controlled environment, offering a sustainable and climate resilient alternative to traditional ocean-based salmon farming methods. Impact Marine Vision is to be the leading supplier of sustainable land-based salmon from NZ

Purpose:

The primary purpose of the project is to meet the growing demand for high-quality salmon while minimising the environmental impact typically associated with conventional aquaculture practices. By utilising a land-based RAS system, the project seeks to ensure the production of healthy, disease-free salmon in a controlled and efficient manner.

Objectives:

To establish a sustainable and environmentally responsible salmon farming operation in Bluff.

To leverage advanced RAS technology to optimise water usage, minimize waste, and mitigate environmental risks.

To produce high-quality salmon products for both domestic and international markets.

To create employment opportunities and support economic development in the local community.

To contribute to the long-term growth and sustainability of New Zealand's aquaculture industry.

Activities:

Secure all necessary regulatory approvals and permits, to commence construction and operation.

Construct a state-of-the-art RAS facility on the leased land, adhering to environmental standards and best practices for salmon.

Equipment Installation: Install RAS infrastructure suitable for farming salmon, including tanks, filtration systems, and water treatment facilities.

Operational Setup: Hire and train staff, develop operational procedures, and initiate fish stocking and husbandry practices.

Quality Assurance: Implement rigorous quality control measures to ensure the production of premium-grade salmon products.

Marketing and Sales: Develop marketing strategies to promote both salmon products locally and internationally, forging partnerships with distributors and retailers.

Community Engagement: Engage with the local community to foster positive relationships and address any concerns regarding the project's impact, emphasising the project's commitment to responsible farming practices for salmon species.

Generate a sustainable revenue stream through the production and sale of high-quality salmon products.

Establish the project as a model of environmentally responsible aquaculture, contributing positively to the local community and industry.

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

Please write your answer here:

Phase 1: Land use & Environmental Planning.

planning due diligence, detailed due diligence, Architectural bulk & location drawings, Pre application meetings. appoint technical experts sep22-dec22 - complete

Phase 1b Fish Farm License Dec22-Feb 23 - complete

Phase1c Water take and discharge consents - In Place

Phase1d: Prepare Assessment of Environmental Effects (AEE) and specialist reports. -complete

Detailed Site Investigation -complete

Geotechnical report complete

12 Architectural preliminary designs complete

13 Earthworks & civils preliminary design- May -July 2024

14 Landscape Architect Plans May -July 2024

15 Transport engineering May -July 2024

Engage with tangata whenua and other stakeholders Feb 23- present (CIA underway-July24)

Phase 2a: resource consent 39 weeks 80 days for processing

Phase2b: Subdivision consent106 days 61 days for processing

Phase2c: Private Plan Change the estimate we have been given is 335 days 60 days for report preparation and 275 days for processing.

Phase 3 Contractor Procurement 9 weeks

Phase 4 Construction 90 weeks

Phase 5 handover and defect notification period 24 weeks

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

Please write your answer here:

Resource Management Act 1991

resource consent

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

Please write your answer here:

Southland Regional Council

Invercargill City Council

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

Please write your answer here:

The application has not been Lodged, it is scheduled to be lodged in Late July 2024.

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

No

Please explain your answer here:

We have a Land Based Fish farm License from MPI for Farming Chinook Salmon in Place.

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

Please write your answer here:

Procurement of the contractor will commence nine weeks subsequent to the receipt of approvals. With funding secured and ready, construction activities can promptly commence upon contractor procurement. The anticipated timeline from the initiation of earthworks to project completion spans 90 weeks, totaling 700 days from the date of approval.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

During the pre-application meetings with both the Southland Regional Council and the Invercargill District Council, it was identified that Te Rūnaka o Awarua and the Bluff Community Board are affected parties.

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 consultation undertaken with the relevant parties has been extensive and inclusive.

With the councils, pre-application meetings have been held to discuss infrastructure-related matters, particularly zoning and footprints. Plans have been devised in collaboration with the councils to address these issues, ensuring alignment with project objectives.

Engagement with Te Rūnaka o Awarua has spanned over a year, emphasising discussions on whanau aspirations and environmental aspects. Furthermore, collaboration with the iwi extends beyond environmental considerations to encompass employment opportunities, fostering a mutually beneficial relationship aimed at sustainable development.

Meeting with the Bluff Community Board with updates since 2023. The board has shown interest in employment opportunities generated by the project, we are committed to providing high-quality jobs and establishing a long-term presence in the Bluff area.

Additionally, a Cultural Impact Assessment (CIA) with Te Ao Marama Incorporated, has been started and is due to be completed in July 2024, we will use this document to help us build upon the relationship with the mana whenua.

Looking ahead, further wananga and engagements with the region's stakeholders are planned for June 2024, alongside additional community engagements. These discussions serve to ensure that project decisions are informed by the needs and aspirations of all stakeholders, fostering a collaborative and inclusive approach to development.

Upload file here:

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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:

The four Rūnanga Papatipu o Murihiku; Te Rūnanga o Awarua, Te Rūnanga o Oraka/Aparima, Te Rūnanga o Hokonui and, Te Rūnaka o Waihōpai are collectively involved in the protection/promotion of the region's natural and physical resources by providing input into the processes required by the RMA and other relevant legislation. Specific provisions within the RMA 1991 Act require the recognition and provision for the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga, to have particular regard to kaitiakitanga and take into account principles of the Treaty of Waitangi. The RMA makes specifi c provisions for iwi management plans, with councils taking into account any relevant planning document recognised by an iwi authority and lodged with a local authority. Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan has been developed by Ngāi Tahu ki Murihiku is an important document to aid us in understanding the statutory acknowledgement areas and the principles and provisions in the settlement area (Ngai Tahu).

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

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?
No
If yes, what are they?:
Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?
No
Has the applicant has secured the relevant landowners' consent?
Yes
Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?
No
If yes, what are they?:
Has there been an assessment of any effects of the activity on the exercise of a protected customary right?
Yes
If yes, please explain:
A cultural impact assessment for the project, led by Te Ao Marama Incorporated, is currently underway, with anticipated completion by July 2024.
Upload your assessment if necessary: No file uploaded
Section 5: Adverse effects
What are the anticipated and known adverse effects of the project on the environment?
Please describe:
Our Assessment of Environmental Effects is currently underway and will be Completed in July 2024
Upload file: No file 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:
Our Assessment of Environmental Effects (AEE) is currently in the compilation stage, and we anticipate having these answers by July 2024."
File upload: No file 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?
Yes
Please explain your answer here:
Our application is underpinned by a robust explanation of how the proposed project aligns with the objectives of the Bill to facilitate the timely delivery of climate resilient infrastructure and development projects with significant regional or national benefits.

and cost-efficient manner compared to conventional approval processes. By expediting decision-making, the fast-track process enables us to navigate regulatory requirements more efficiently, reducing administrative burdens and associated costs.

The fast-track decision-making process provided by the Bill offers a streamlined pathway for our project, ensuring it can be processed in a more timely

This accelerated process is particularly advantageous for our project, which aims to establish a state-of-the-art RAS land-based salmon farm in Bluff,

Southland, New Zealand. The project holds significant potential to deliver regional and national benefits, including economic growth, job creation, and enhanced food security and affordability.

Access to the fast-track process will enable us to expedite project milestones, from obtaining necessary permits to commencing construction and operational activities. By minimising delays and uncertainties, we can efficiently allocate resources and capitalise on opportunities for innovation and sustainable development.

Overall, the fast-track process provided by the Bill is essential for realizing the full potential of our project and ensuring its timely delivery, thereby contributing to the broader objectives of promoting economic development and prosperity for the benefit of our region and the nation as a whole."

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

Please write your answer here:

The proposed project is poised to have a positive impact on the efficient operation of the fast-track process outlined in the Bill. By engaging with this process, our project will not only benefit from expedited decision-making but also contribute to the overall effectiveness and success of the fast-track mechanism.

Firstly, our project aligns closely with the objectives of the fast-track process, as it embodies the spirit of delivering infrastructure and development projects with significant regional or national benefits in a timely manner. By adhering to the requirements and timelines set forth by the fast-track process, we ensure that our project progresses efficiently through the approval stages.

Secondly, our proactive engagement with the fast-track process demonstrates our commitment to streamlining regulatory procedures and minimizing bureaucratic hurdles. By providing comprehensive documentation, conducting thorough assessments, and actively collaborating with relevant authorities, we facilitate smooth and expedited decision-making, thereby enhancing the operational efficiency of the fast-track process.

Furthermore, the successful implementation of our project under the fast-track process serves as a positive example of its efficacy in expediting critical development initiatives. By showcasing the benefits of streamlined decision-making and accelerated project delivery, our project reinforces confidence in the fast-track mechanism, encouraging other stakeholders to embrace its principles and leverage its advantages for future endeavors.

In summary, the impact of our project on the efficient operation of the fast-track process is twofold: it benefits directly from the streamlined procedures and expedited timelines provided by the process, while also contributing to its overall success and effectiveness through proactive engagement and successful project delivery."

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

Sector plan or strategy

Please explain your answer here:

The New Zealand government has set a target of reaching NZ\$3 billion in annual sales by 2035 through its Aquaculture Strategy. Land-based aquaculture has been recognized as one of the sustainable growth pathways to help accomplish this goal. Currently, there are no commercially operational large-scale land-based salmon production facilities in New Zealand, beyond those used to produce fish to stock the inshore marine farms:

- This project aims to mitigate investment risks associated with such facilities through comprehensive research and strategic planning, yielding evidence-based recommendations, robust business cases, and advanced genomic insights.
- The project's outcomes will directly benefit the New Zealand aquaculture industry and its stakeholders by facilitating investment and sustainable implementation of large-scale closed-containment recirculated aquaculture systems in the country.
- Māori landowners and their communities will benefit directly as stakeholders from foreign direct investment in land-based salmon production facilities on their whenua or within their rohe.
- It will foster job growth, particularly in high-value positions, within regional and lower decile communities.
- The initiative will bolster New Zealand's aquaculture Gross Domestic Product without exacerbating environmental impacts associated with increased inshore marine aquaculture.
- Given its high-risk pre-commercial nature, the project requires accelerated support.
- Timely execution is imperative to position New Zealand within the rapidly expanding international wave of land-based aquaculture.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

ImpactMarine has secured 9(2)(b) in Foreign Direct Investment funds for the development and operation of a 10ha aquaculture farm in Bluff on freehold leasehold industrial land, as well as a 15ha aquaculture farm in Whakatane on freehold land:

- This investment is expected to generate a combined gross annual revenue of \S 9(2)(b)(ii) by 2030, making a substantial contribution to the New Zealand Government's goal of achieving \S 9(2)(b) in annual sales by 2035 through its Aquaculture Strategy. o The operation life of these facilities is projected to be at least 50 years.
- o The global market demand for salmon products is projected to exceed supply for the foreseeable future because of climate change, diseases, and a
- tightening of environmental regulations on the supply from conventional inshore salmon aquaculture.
- o Without government funding, annual revenue projections could be reduced and delayed.
- The project will substantially reduce the risk for investors in deploying and timing the investment of secured Foreign Direct Investment funds into the

two facilities:

- o It will facilitate the consolidation of knowledge from various organisations relevant to the establishment of land-based salmon aquaculture in New Zealand
- o Outputs from this collaboration will ensure stakeholders can make more effective evidence-based decisions regarding investment, operations, and regulatory approvals.
- o These benefits are anticipated to persist for the foreseeable future as the industry expands and to provide a firm foundation as the industry, economic, and regulatory environments evolve over time.

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

n/a

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

ImpactMarine has secured **s** 9(2)(b) in Foreign Direct Investment funds for the development and operation of a 5ha aquaculture farm in Bluff on leasehold industrial land, as well as a 10ha aquaculture farm in Whakatane on Māori-owned land:

- This investment is expected to generate a combined gross annual revenue of \$9(2)(b)(ii) million by 2030, making a substantial contribution to the New Zealand Government's goal of achieving \$9(2)(b) in annual sales by 2035 through its Aquaculture Strategy. o The operation life of these facilities is projected to be at least 50 years.
- o The global market demand for salmon products is projected to exceed supply for the foreseeable future because of climate change, diseases, and a tightening of environmental regulations on the supply from conventional inshore salmon aquaculture.
- o Without government funding, annual revenue projections could be reduced and delayed.
- The project will substantially reduce the risk for investors in deploying and timing the investment of secured Foreign Direct Investment funds into the two facilities:
- o It will facilitate the consolidation of knowledge from various organisations relevant to the establishment of land-based salmon aquaculture in New Zealand
- o Outputs from this collaboration will ensure stakeholders can make more effective evidence-based decisions regarding investment, operations, and regulatory approvals.
- o These benefits are anticipated to persist for the foreseeable future as the industry expands and to provide a firm foundation as the industry, economic, and regulatory environments evolve over time.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

Yes, the project will support primary industries, including aquaculture, in New Zealand. ImpactMarine's initiative to establish land-based aquaculture facilities in Bluff and Whakatane represents a significant investment in the aquaculture sector. ImpactMarine's secured Foreign Direct Investment funds of \$9(2)(b) for the development and operation of these aquaculture farms demonstrate a commitment to advancing aquaculture practices in New Zealand. By utilising closed containment recirculated aquaculture systems, the project aims to minimise environmental impacts while maximizing resource efficiency. Furthermore, the project's long-term operation, with a projected lifespan of at least 50 years, ensures sustained economic benefits for the aquaculture sector and the broader economy.

Additionally, the project's social and cultural implications are significant, with Māori landowners and local communities benefiting directly from foreign direct investment and job growth. Moreover, the project's innovative approach positions New Zealand as a global leader in land-based salmon production, with potential implications for future research, innovation, and industry growth.

In conclusion, our substantial investment, innovative approach, and strategic alignment with national goals make it a key contributor to supporting primary industries, including aquaculture, and advancing New Zealand's aquaculture sector towards sustainable growth and international leadership.

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:

Yes, the project will support climate change mitigation efforts, including the reduction or removal of greenhouse gas emissions. By implementing closed containment recirculated aquaculture systems, the project aims to minimize environmental impacts associated with traditional inshore salmon aquaculture, which often contributes to greenhouse gas emissions and other environmental pollutants.

Closed containment systems significantly reduce the risk of escapees and disease transmission to wild fish populations, thereby preserving ecosystem integrity and biodiversity. Moreover, these systems utilize advanced filtration technologies to recover and recycle water, reducing the need for fresh water intake and minimizing water pollution.

Additionally, the project's waste management strategies, such as recovering and repurposing soluble and suspended solid wastes as agricultural nutrient sources, contribute to reducing organic pollution and nutrient runoff into waterways, further mitigating environmental impacts.

Furthermore, the project's commitment to sourcing power from renewable energy sources, such as hydroelectricity and geothermal energy, reduces reliance on fossil fuels and associated greenhouse gas emissions. This transition to renewable energy aligns with global efforts to decarbonize the economy and combat climate change.

In conclusion, through the adoption of sustainable practices, advanced technologies, and renewable energy sources, the project actively contributes to climate change mitigation efforts by reducing greenhouse gas emissions and minimizing environmental impacts associated with aquaculture operations.

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

Yes

Please explain your answer here:

Yes, the project will support adaptation, resilience, and recovery from natural hazards. The implementation of closed containment recirculated aquaculture systems mitigates various risks associated with natural hazards, thereby enhancing the project's resilience and ability to recover from adverse events.

Closed containment systems significantly reduce the vulnerability of aquaculture facilities to natural hazards such as storms, floods, and extreme weather events. These systems are designed to withstand adverse environmental conditions, protecting fish stocks and infrastructure from damage or loss during disasters.

Furthermore, the project's strategic location on brownfield sites, such as leasehold industrial land in Bluff and Māori-owned land in Whakatane, minimizes exposure to natural hazards compared to traditional inshore aquaculture facilities. This reduces the project's susceptibility to coastal erosion, tsunamis, and other coastal hazards.

Moreover, the project's waste management strategies, including the recovery and repurposing of solid wastes as agricultural nutrient sources, contribute to ecosystem resilience by reducing nutrient runoff and enhancing soil fertility. This supports ecosystem recovery and resilience in the event of natural disturbances such as soil erosion or nutrient imbalances.

Additionally, the project's commitment to sourcing power from renewable energy sources, such as hydroelectricity and geothermal energy, enhances energy resilience and reduces reliance on fossil fuels, which are vulnerable to supply disruptions and price fluctuations due to natural hazards.

In conclusion, by adopting closed containment recirculated aquaculture systems, strategic site selection, and sustainable practices, the project enhances adaptation, resilience, and recovery from natural hazards, thereby ensuring the long-term viability and sustainability of aquaculture operations in the face of environmental challenges.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

Protecting Water Quality: Closed containment systems and the associated treatment systems prevent the discharge of pollutants into surrounding water bodies, safeguarding water quality and aquatic habitats.

Mitigating Disease Risks: By isolating fish populations from wild marine environments, closed containment systems eliminate the risk of disease transmission between farmed and wild fish, maintaining strong biosecurity measures and eliminating the spread of pathogens.

Conserving Energy: Closed containment recirculated aquaculture systems are designed to be energy-efficient, optimizing energy usage for water filtration, oxygenation, and temperature control, thus reducing overall energy consumption and associated environmental impacts.

Supporting Sustainable Fisheries: Land-based aquaculture reduces pressure on wild fish populations by providing an alternative source of seafood, contributing to the conservation and sustainable management of marine resources.

Promoting Responsible Sourcing: The project emphasizes responsible sourcing practices, including the use of sustainable fish feed sourced from certified suppliers and the adoption of traceability measures to ensure transparency and accountability throughout the supply chain.

Encouraging Innovation: The project encourages innovation in aquaculture technology and practices, driving advancements in sustainability, efficiency, and environmental stewardship within the industry.

Enhancing Waste Management: The project implements efficient waste management strategies, recovering and repurposing solid wastes as agricultural nutrient sources, reducing organic pollution, and enhancing soil fertility.

Promoting Biodiversity: The project's focus on sustainable practices and habitat protection promotes biodiversity in aquatic ecosystems, supporting the health and resilience of marine environments.

Yes
Please explain your answer here:
Yes, the project is consistent with local and regional planning documents, including spatial strategies. The majority of the project area is situated within industrial land, aligning with the designated land use and zoning regulations outlined in local and regional planning documents. While a portion of the property falls within a rural zone, the project necessitates a subdivision and private plan change to reclassify it to industrial use. Importantly, the council did not raise any objections to undertaking this proposed change, considering factors such as the proximity to existing industrial land and the project's alignment with the surrounding area's land use patterns. Therefore, the project's compliance with relevant planning documents demonstrates its consistency with local and regional spatial strategies.
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:
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:
None
Load your file here: No file uploaded
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: Aaron McCallion
Important notes

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