

Hon David Parker BCom, LLB

Attorney-General

Minister for the Environment

Minister for Oceans and Fisheries

Minister of Revenue

Associate Minister of Finance



MFE BRF-34
DOC 21-B-0569

9 September 2021

Rob Phillips
Chief Executive Officer
Environment Southland
Email: s 9(2)(a)

Dear Rob Phillips

COVID-19 Recovery (Fast-Track Consenting) Act 2020 – 2021-48 - Hananui Aquaculture Project – Comments sought

In the week commencing Monday 10 May 2021, Ngāi Tahu Seafood Resources Limited applied to refer the Hananui Aquaculture project to an expert consenting panel (a panel) for consideration under the COVID-19 Recovery (Fast-track Consenting) Act 2020 (FTCA). As the project lies in the Coastal Marine Area, the Minister of Conservation and I will jointly decide on the referral application.

The project is described as follows, and a copy of the application is attached.

The project is to construct and operate an open ocean marine farm (salmon) within a 2500 hectare area of the CMA including 500 hectares of exclusive occupation of the CMA. The project comprises four separate marine farms including five anchored barges proposed as operational bases for the farms. It will be developed in four stages over ten years to produce up to 16,000 tonnes of salmon per annum.

The project proposes adaptive management where management practices are modified throughout the life of the project to remedy and mitigate adverse effects.

The project will involve activities such as:

- works to construct and install net pens, mooring lines, anchors, navigational aids and lights and other structures
- disturbance and occupation of the seabed
- moorings for five barges
- introduction of exotic fauna
- deposition of material on the seabed
- discharges of water and contaminants to water
- all other works associated with the above activities.

The applicant is seeking coastal permits under the Regional Coastal Plan for Southland, to be determined for the project through the fast-track process. A resource consent application for the same project was lodged with Southland Regional Council in December 2019 (RMA consent) and is currently on hold while further information is being prepared.

On behalf of myself and the Minister of Conservation, I invite you to provide written comments on the referral application pursuant to section 21(2) of the FTCA (a template is attached for this purpose). Comment is sought on the specific matters outlined in the table below and on any other matter you consider relevant to our decision on whether to refer the project to a panel. If it is more efficient to discuss this application, please contact our team at fasttrackconsenting@mfe.govt.nz to arrange an appointment.

| Specific questions on the application |
|---|
| <ol style="list-style-type: none">1. Are there any reasons that you consider it more appropriate for the project, or part of the project, to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the FTCA?2. What reports and assessments would normally be required by the council for a project of this nature in this area?3. In relation to the resource consents lodged with the Southland Regional Council for this project:<ol style="list-style-type: none">a. What is the current status of these resource consent applications?b. When would council anticipate these resource consent applications to be determined under the Resource Management Act 1991?4. Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your region?5. In relation to the review of the Regional Coastal Plan for Southland:<ol style="list-style-type: none">a. What is the proposed timing to release a new Proposed Regional Coastal Plan?b. Is the review process identifying any issues regarding aquaculture which we should be aware of? |

Please provide your comments via return email within 10 working days so that we can take them into consideration when deciding on whether or not to accept the application and refer the project to a panel.

This information is provided to you in confidence and as part of the statutory process set out in the FTCA. Please do not forward the application or the request for comments to anyone outside your organisation.

If we decide to refer the project to a panel, Southland Regional Council will have the opportunity to nominate a local authority representative (who could be a councillor or independent hearings commissioner) to sit on the panel and determine the resource consent application(s) for the project. Applicants will provide a detailed assessment of environmental effects at this next stage and the council will have the opportunity to provide further comments to the panel. The Ministry for the Environment has prepared guidance on local authority involvement with fast-track consenting projects which you can access on the Ministry for the Environment website.

Yours sincerely



Hon David Parker
Minister for the Environment

Enclosures:

- A. Application to refer the Hananui Aquaculture project to an expert consenting panel, including supporting information
- B. Response template for written comments
- cc. Bruce Halligan, Acting Consents Manager s 9(2)(a)