

Ngāi Tahu Seafood - Hananui Aquaculture FTAA-2511-1138

Environment Southland Position Statement for Convenor's session:

INTRODUCTION:

1.0 Thank you for the minute of 11 February 2026 and for the opportunity to participate in the Convenor's Conference on 18th February 2026.

Environment Southland will be represented by:

- **Hayley Fitchett, General Manager – Strategy & Regulation**
- **Lacey Bragg, Consents Manager, and**
- **Bruce Halligan, Strategic Regulatory Advisor**

2.0 Environment Southland (**ES**) and Ngāi Tahu Seafood (**the Applicant**) have had extensive discussions in relation to the Hananui Aquaculture project over several years, since 2019. This has occurred both before, during and after the previously declined Covid-19 fast track application, and in the preparation of the current application under the Fast-Track Approvals Act 2024 (**FTAA**).

EXTENT OF ENGAGEMENT, RESOLUTION OF ISSUES AND CONDITIONS:

3.0 The Applicant has engaged proactively and constructively with ES on the preparation of its current application, has been receptive to the feedback provided by ES, including making changes to the Application to reflect that feedback.

Where ES has not held appropriate in-house expertise to assess technical elements of the Hananui Aquaculture Project, it has engaged external expertise to ensure that an appropriate rigour of technical review has occurred, which is an important part of ES's regulatory role. The Applicant has been agreeable to such review processes throughout, and the result is that there are no areas of disagreement between ES and the Applicant on technical matters.

4.0 For the previous (declined) application, ES was broadly supportive of the application, while also recognising that there were ecological, benthic and landscape issues requiring close scrutiny.

5.0 Significantly, ES notes that the Applicant has made important modifications to the current application, to reflect the concerns the panel identified in the decision on the previous application.

ES is strongly supportive of these modifications made to the project to further mitigate adverse effects, and remains supportive of the application.

- 6.0 ES has an enduring partnership with Te Rūnanga o Ngāi Tahu and recognises the very strong link between this project and Te Tiriti and the associated Ngāi Tahu settlement, rangatiratanga and aspirations for Ngāi Tahu whānui.
- 7.0 This project is specifically identified (Page 19) in the Murihiku Aquaculture Pathway 2025, to which Environment Southland was a participant and signatory. This document articulates the strong regional desire to grow the aquaculture industry to be a key socio-economic pillar of Murihiku/ Southland, while also recognising that this needs to occur in a careful and sustainable manner. The link to this Pathway document is provided below:

<https://murihikuaquaculture.nz/aquaculture-pathway>

- 8.0 ES has had ongoing engagement with the Applicant on the proposed conditions of consent, and there have been a number of changes made to reflect this engagement. This has resulted in the production of a suite of consent conditions which ES is comfortable with.
- 9.0 ES recognises that potential landscape effects were a key consideration of the panel during the previous application process. ES has undertaken an external expert review of the current application and there has been expert caucusing between the Applicant's landscape consultant and the consultant engaged by ES.

The outcome of this review, caucusing and engagement is that ES is comfortable with the landscape effects of the proposal, noting the changes made from the previous application as referred to in paragraph 5 above.

ES also engaged external expert reviewers in relation to benthic and water quality impacts and engaged with the Applicant on those issues. Like landscape, the outcome is that ES is comfortable on those technical issues.

- 10.0 While ES is comfortable with the proposed suite of conditions, given its ongoing role in monitoring and, if necessary, enforcement, ES will participate in the review of final draft conditions, as is provided for in the FTAA process.

COMPLEXITY, PANEL COMPOSITION AND TIMEFRAMES:

11.0 Engagement between ES and the Applicant has continued and ES was provided the opportunity to review a draft of the joint memorandum prepared by the Applicant, Ngāi Tahu ki Murihiku and Te Rūnanga o Ngāi Tahu.

ES supports the content of the joint memorandum with respect to its position in relation to the items in Item 7 of the Convenor's Minute on:

- **Level of complexity.**
- **Suggested panel composition – While it is noted from Item 9 that the convenor is not seeking nominations, ES has engaged with a nominee that ES considers would be suitable and is happy to provide further information on this if required.**
- **Timeframe for progression.**

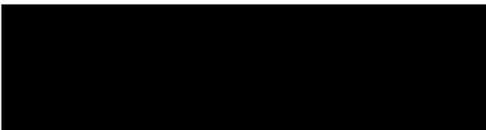
12.0 Given the close alignment between ES, the Applicant, Ngāi Tahu ki Murihiku and Te Rūnanga o Ngāi Tahu on the matters for comment raised in the Convenor's Minute, ES considered becoming a signatory to the joint memorandum. However, it was not able to achieve that within its delegations in the timeframe for providing responses directed by the Minute.

Environment Southland's FTAA delegations require elected representative approval of substantive comments, so elected representatives will have an opportunity for formal input at that stage.

13.0 ES is very happy to engage further during the FTAA process to clarify or respond to any matters for the assistance of the panel, and will continue to engage closely with the Applicant.

I hope this information is of assistance to the panel.

Signed

A solid black rectangular box used to redact the signature of Hayley Fitchett.

Hayley Fitchett

GM -Regulatory

16 February 2026