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Hananui Aquaculture Project
c/- Environmental Protection Authority
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Attention: Panel

Dear Chair and Commissioners

Reference: Hananui Aquaculture Project – Response to Draft Consent Conditions and Further Information Request (Minute 7)

In response to Minute 7 please find enclosed Ngāi Tahu Seafood Resources Limited's (NTS) comments on the draft consent conditions provided by the Panel (section 70 of the FTAA). As requested, comments have been provided on the word version of both the RMA approval conditions and the Wildlife Act approval conditions, as either suggested track changes or by comment box.

Where necessary to inform these comments NTS has consulted with other parties (Environment Southland, Te Ao Marama and Te Rūnanga o Ngāi Tahu), and as requested by the Panel has identified in the comment boxes where those discussions have taken place and the agreed position between the parties. For the sake of completeness NTS notes that queries from the Ministry of Primary Industries (MPI) were also responded to, which NTS understands has resolved those queries and resulted in no comments from MPI on the draft conditions.

Some comments from NTS suggest 'administrative' type changes that the Panel may wish to make, for example relating to renumbering if conditions or appendices are deleted. Please let NTS know if you would like those changes made and an updated 'clean' version of the conditions provided.

In Minute 7 the Panel also asked the applicant to provide the following further information:

[23] The application material refers to a contribution of "\$500m in gross annual revenue" at full scale. Can the Applicant please confirm that this is correct, and advise approximately how many years the HAP might operate "at full scale"

NTS advises that the figures in the substantive application referenced the Murihiku Southland Aquaculture Pathway 2025, which assumed that the HAP would take 10 years to fully scale (a 25 year consent then meaning that the HAP might operate at full scale for 15 years, not accounting for

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continued operation with the replacement of the consents at the end of their granted term) and estimated the annual revenue at full scale to be \$498m based on 14,000 tonnes of harvested fish per annum by 2040. The underlying work that supported these figures was undertaken by Infometrics. Invest NZ also supported this figure, in its letter included as part of the substantive application.

NTS notes that the revenue assumptions used in the analysis discussed above are consistent with prevailing market conditions and industry forecasts for premium salmon products and considers the estimates in the application as appropriate for assessing the potential economic contribution of the HAP.

[24] Finally, can the Applicant and Environment Southland confer and provide an agreed list of resource consent triggers for Appendix A of the Draft Decision. If this has previously been provided and there are no changes to this, then please confirm.

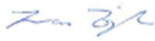
Section 8.2.2 of the substantive application provides a list of the relevant rules that trigger consent requirements and the activity classification for each activity. NTS has conferred with Environment Southland and both parties confirm that the list provided in Section 8.2.2 is accurate, with the exception of the fact that reference to Rule 9.1.1 should be included for the avoidance of doubt, so that consent for occupation of the coastal marine area for the HAP is triggered by both Rules 9.1.1 (the more general rule for exclusive or preferential coastal occupation) and Rule 15.1.7 (the more specific rule for marine farming).

In discussions with Environment Southland NTS notes that it is normal practice for the council to issue one 'bundled' consent certificate (referred to by Environment Southland as a coastal permit in totality) that covers all the various activities that trigger consent under the Regional Coastal Plan for Southland. NTS confirms that it supports that approach.

Please do not hesitate to contact the undersigned if you have any queries.

Yours sincerely

Stantec New Zealand



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