
FTAA-2511-1138- Hananui Aquaculture Project - Environment Southland response to EPA on applicant's latest conditions

From Bruce Halligan [REDACTED]
Date Thu 11/06/2026 2:15 PM
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Kia ora Alex/ Mel,

Thank you for the EPA email of 8 June 2026 and the opportunity to comment on the applicant's updated suite of conditions , provided by the applicant in response to Minute 5.

For the panel's information , there has been ongoing collaborative discussion between the applicant and Environment Southland in relation to the conditions suite , prior to the lodgement of this latest material with the EPA by the applicant.

In advance of the conditions workshop scheduled for 23 and 24 June , I advise that overall Environment Southland is comfortable with the applicant's suite of proposed conditions, with the following exceptions/ suggestions below :

1. Decommissioning,- as per Environment Southland's substantive comments, ES would wish to see conditions covering the decommissioning of all facilities authorised by the various approvals . While it is understood that the applicant does not favour a requirement for a closure or decommissioning plan , ES considers that it is important that the conditions require appropriate removal of all consented facilities and associated rehabilitation . Such removal and rehabilitation would be no small task in this relatively remote location, and ES considers that this should occur at no cost to the ratepayer or the taxpayer. ES notes that conditions of this type are not uncommon in recent fast track approvals for major projects.
2. Condition 66(c) – Our Senior Resource Management Officer suggested that the 'and' at the end needs removed.
Keeping the 'and' may cause confusion that there is only an issue if both c and d occur together, instead of the intended separately or together.
3. Also on Condition 66- Dr Keeley our technical reviewer has suggested the following addition to Condition 66:

" Condition 66. I wonder about including a clause along the lines of: "...cause: visible degradation to the coastal embayment habitats inshore of the farm." This is being monitored, but at this stage there is no condition referring to it. Or perhaps Table 5 in the EMMP constitutes an AMT that then falls under condition 67? (although it is not mentioned under section C-1 as an AMT). Actually, on this, I see the wording in Table 5 (and 6) only really concerns water column parameters, whereas I think the benthos is as important, if not a better place to look. e.g. Compositional changes, in particular, increased coverage of various forms of algae (filamentous, diatom and bacteria mats, small macrophytes, SIBS sampling for microbial composition and bMBI should also work). My original recommendation was for some sort of visual assessment. Sorry, I should have picked this up previously. I suspect the problem is that this has fallen between the cracks with regard to the benthic and WC monitoring plans - it was identified from the WC AEE, but implicates benthic / visual monitoring (that falls outside of SLR's mandate?). If it was to be formalized, it may require an additional section on Table C-1? Perhaps also indicated on the maps."

Hopefully this is useful in terms of refining conditions issues still in contention in advance of the 23/24 June conferencing, which ES staff and Dr Keeley will be joining remotely .

ES welcomes the opportunity to discuss the above further.

Thanks again for the opportunity to comment

Yours faithfully

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