



**Stantec New Zealand**  
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22 May 2026

Enquiries: Frances Lojkin  
Project No: 310001082

Environmental Protection Authority  
Private Bag 63002  
Wellington 6140

**Attention: Alex Mickleson**

Dear Alex

**Reference: Hananui Aquaculture Project (FTAA-2511-1138)**

In its response to Minute 4 from the Expert Panel provided on 22 April 2026 Ngāi Tahu Seafood Resources Limited (Ngāi Tahu Seafood) offered to provide an updated set of proposed consent conditions (to respond to the Minute) and a draft EMMP to the Panel by 22 May 2026.

Please find attached a table that provides a fully updated set of consent conditions, with commentary to explain where proposed amendments have come from. Note that Appendix C to the consent conditions is attached at the end of that document, with comments, as the formatting did not allow its inclusion in the overall table. The updated conditions have responded to:

- the Panel's questions posed in Minute 4;
- comments received on the application in response to the invitation from the Panel, and Ngāi Tahu Seafood's response to those comments, including responses to the Department of Conservation's s51 report (NTS response provided to the Panel on 7 May 2026);
- comments made by Environment Southland and the Department of Conservation in response to the Ngāi Tahu Seafood response to Minute 4 (those comments having been provided to the Panel by those parties on 18 May 2026).

The proposed conditions in the attached table therefore represent a comprehensive response to every query or comment made to date. We also attach a brief memo from Stantec, including a flow chart, to provide extra explanation of a proposed re-ordering of the conditions relating to management of effects on the seabed and water column.

Ngāi Tahu Seafood intends to engage with parties, particularly Environment Southland and the Department of Conservation in relation to the updated set of consent conditions with a view to resolving any remaining issues ahead of the other parties responding to the conditions and the proposed conditions workshop in late June. Ngāi Tahu Seafood can provide an updated set of consent conditions by 8 June 2026 to reflect any further changes agreed with parties.

22 May 2026

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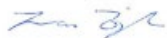
Reference: Hananui Aquaculture Project (FTAA-2511-1138)

We also attach, consistent with responses to Questions 17, 18 and 19 in Minute 4, a draft Environmental Monitoring and Management Plan (EMMP) for the Panel's information. This EMMP now incorporates pre-development monitoring that was previously going to be included in a Baseline Monitoring Plan. As noted in Ngāi Tahu Seafood's response to Minute 4 provision of a draft EMMP prior to grant of consent has not to date been the typical approach adopted for offshore marine farming applications and is not the approach outlined within the Government's *Best practice guidelines for benthic and water quality monitoring of open ocean finfish culture in New Zealand* (December 2021). Ngāi Tahu Seafood would therefore request that the Panel recognises that the EMMP is draft and that the certification of the final EMMP to be generally in accordance with the draft is still being sought post granting of consent rather than through the Panel decision process.

If you could pass the attached material to the Panel at your earliest convenience we would appreciate it. Please do not hesitate to contact the undersigned if you have any queries.

Yours sincerely

**Stantec New Zealand**



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Encl

Updated proposed consent conditions and associated explanatory memo, draft EMMP