



Te Rūnanga o NGĀI TAHU

17 July 2026

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**Comments on draft decision and conditions FTAA-2511-1138 – Hananui Aquaculture Project**

This letter is provided on behalf of Te Rūnanga o Ngāi Tahu (**Te Runanga**) which is the statutorily recognised representative tribal body of Ngāi Tahu Whānui, as provided by section 15 of the Te Rūnanga o Ngāi Tahu Act 1996 (**TRONT Act**). Te Rūnanga makes these comments in relation to the draft decision and conditions for the application by Ngāi Tahu Seafood Resources Limited (**Ngāi Tahu Seafood**) for the development of marine farms in Te Ara a Kiwa/ Foveaux Strait/ (FTAA-2511-1138).

Te Runanga appreciates the opportunity to comment on the draft decision and conditions and is comfortable with the draft conditions.

We note that at Condition 2 the Panel has indicated that it is still to make a final determination on which entity or entities should be required to certify any particular management plan. We fully support the applicant's position that for any particular management plan it should be just one organisation that certifies a management plan rather than two organisations. We have worked with the applicant for a number of years on the management plans that were provided as part of the application process and would be concerned if even with all of that work further discussions were needed between two organisations to agree that the plans were suitable.

We also note that the Panel has queried whether references to Papatipu Rūnanga throughout the conditions should be changed to Ngā Rūnanga ki Murihiku and we confirm that that change should be made, and a definition of the term included in the Interpretation section of the conditions as we understand will be suggested by the applicant.

As noted in our comments on the substantial application, we see this development as a contemporary expression of mahinga kai, which will enable Ngāi Tahu to continue their traditional and ongoing relationship with Te Ara a Kiwa and Rakiura as mana whenua/mana moana.

Nuku noa, nā

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