

To: Expert Panel

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Project/File: Date: 22 May 2026

Reference: Hananui Aquaculture Project Updated Seabed and Water Column Conditions

As noted in the table that sets out updated proposed consent conditions, from Condition 66 onwards Ngāi Tahu Seafood (NTS) has proposed a re-ordering of the conditions to recognise the provision of the draft EMMP to the Panel on 22 May 2026 and to clarify the order of events for management of seabed and water column effects.

The attached flow chart (Figure 1) sets out the process visually and also includes the Stage Progression Report process.

The process proposed:

- Reflects the setting of EQZ and AMT through Appendix C of the proposed consent conditions, rather than having them as draft, an amendment proposed in response to Question 20 of Minute 4;
- Reflects the provision of a draft EMMP to the Panel on 22 May 2026, which has been drafted to include the requirements for pre-development (baseline) monitoring, and an amendment proposed to Condition 2 to require that the EMMP that will be submitted to Environment Southland for certification post granting of consent builds on the draft EMMP provided to the Panel;
- As a first step post granting of consent and prior to the introduction of fish to the marine farms:
 - Requires provision of the final EMMP to Environment Southland for certification;
 - Once the EMMP is certified pre-development (baseline) monitoring would be undertaken;
 - A report of that monitoring would then be provided to Environment Southland
 - During this period, provision has been made in the proposed consent conditions for NTS to review and amend the EMMP and/or the AMT if required, for example if a monitoring technique proved impractical to implement or was not generating the required information. While the draft EMMP is based on up to date scientific understanding and methodologies, NTS and its experts are aware of the fast moving nature of science in this field and do not want the Hananui Project unnecessarily disadvantaged if the science advances as NTS is getting the project underway
 - Any review or amendment of the EMMP and/or AMT would require certification by Environment Southland
- Once the pre-development work has been completed and fish are introduced to the marine farms, NTS would undertake monitoring as outlined in the certified EMMP and provide annual reports of

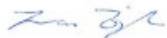
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that monitoring as required by the proposed consent conditions. Marine farming at the site will be governed by the AMT and compliance limits included in the proposed consent conditions (Appendix C and Condition 66 respectively);

- If any exceedances of the AMT are recorded during marine farming, NTS would follow the adaptive management approach to addressing those exceedances that is outlined in section 4 of the EMMP;
- Similar to the pre-development phase, proposed consent conditions provide a process for NTS to review and amend the EMMP, EQZ and AMT if required, and subject to certification by Environment Southland. These proposed conditions are necessary to recognise that the consent would be granted on the basis of modelled effects and once monitoring information is available adjustments may be required. Any adjustments would however be within the context of ensuring effects on the environment remained at acceptable levels, and within the compliance limits set in Condition 66. Review and amendment of EMMPs and EQZ has previously been provided for in other salmon farming operations in New Zealand when they were novel, notably the high flow inshore sites in Marlborough for New Zealand King Salmon. Environment Southland indicated in its response to Minute 5 that the request to be able to amend the EQZ had precedent in other marine farming operations in New Zealand and would add clarity to the consent conditions. With respect to the AMT, in response to the Panel's Question 20 in Minute 4 NTS has offered to confirm the AMT through the proposed consent conditions, which is a more stringent approach than was required of New Zealand King Salmon for the Blue Endeavour project, and is more detailed than the consent issued to the Pare Hauraki Kaimoana Project. It is in recognition of this greater stringency that the ability to adjust the EQZ and AMT is sought in the proposed consent conditions.
- Once Stage 1 is complete, the proposed consent conditions require the preparation of a Stage Progression Report, with multiple outcomes possible for stage progression dependent on that report (as outlined in proposed Conditions 80-82). Marine farming subsequent to that Stage Progression Report then follows the same requirements as Stage 1 in terms of implementation, monitoring and reporting.

Yours sincerely

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Figure 1: Overview of the seabed deposition and water column effects management conditions

