
Hananui Aquaculture Project - Environment Southland technical review information for the EPA Panel

From Lacey Bragg [REDACTED]
Date Thu 19/03/2026 3:03 PM
To Alex Mickleson [REDACTED]; Bruce Halligan [REDACTED]
Cc Loikine, Frances [REDACTED]; Stephen Christensen [REDACTED]; Thomas Hildebrand [REDACTED]

 3 attachments (676 KB)

HAP 7 11 25.pdf; Peer review Assessment of Seabed Effects N Keeley 171025.pdf; Cawthron response to ES review.pdf;

Kia ora Alex,

Thank you for coordinating the recent Panel meeting for the Hananui Fast Track Approval application. As requested by the Panel from Environment Southland, is the following:

Landscape review

Attached to this email is the landscape review produced by Mike Moore entitled 'HAP 7-11-25'.

Seabed review

Attached to this email is the seabed review produced by Dr Keeley dated 17 October 2025, and also includes a review of the 'Hananui Monitoring Plan Summary' which was the draft title for Seabed monitoring report Appendix Z to the application.

Also attached is Cawthron response provided by the Applicant on 28 October 2025 to the Dr Keeley review, entitled "Cawthron response ES review". Environment Southland also received an updated version from the Applicant of the 'Hananui Monitoring Plan Summary', incorporating the revisions and recommendations provided by Dr Keeley review on 28 October 2025.

Water column review

As discussed in the meeting, Dr Keeley's review forms part of the application documents as Appendix G to the SLR Water Column Assessment.

SLR provided a response to the review comments of Dr Keeley, and this response is included in the application documents as Appendix H to the SLR Water Column Assessment.

For completeness, please see the below email from Dr Keeley, which outlines his feedback on the responses to his review of the seabed and water column reports.

Kind regards

Lacey Bragg

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Environment Southland supports flexible working arrangements. I may have sent this email outside of business hours and I only anticipate a response during your working hours.

From: Nigel Keeley <[REDACTED]>
Sent: Monday, 17 November 2025 1:56 pm
To: Lacey Bragg <[REDACTED]>
Subject: Re: [External] Hananui Aquaculture Project - Draft conditions for your review comments

Hi Lacey,
Please find some feedback regarding their responses to my review below.

Seabed report:

Basically, good and addresses my questions. I don't see any major outstanding issues. Just 2 things that might require further consideration:

1. Additional information about elongated ridges is useful. However, regarding the potential accumulation points, I think it would be prudent to keep an eye on these through the monitoring program. Simplest way I can think of would be to do something like video transects perpendicular to the ridges in a few strategic places, and if accumulation / enrichment is evident, perhaps some targeted benthic sampling.
2. The additional context provided about how the effects of waves on resuspension is (and isn't) incorporated into the models is good and informative for readers. I agree with most, but there is one thing I would ask them to consider. They state the wave orbital motion will not affect particle dispersion. This is true in an otherwise static environment, but I would argue not true in the presence of currents, which is the case at this site. i.e., If particles are disturbed and drawn back up into the water column from orbital wave action AND you have persistent currents, surely they will be dispersed more widely. Suggest some rethinking around that part. (also in last para on P105) Otherwise the additional assessment of the effect of wave action is helpful and about as good as can be done at present (IMO).

Other comments

3. Thanks for including the accumulated feed line on the graph. Surprised to see that it is completely linear, possibly not that interesting. Perhaps a running total (summing across cages) would be more informative about what the overall area is receiving at any one point in time? This is a minor comment though.
4. Responses about knowledge enrichment in zone 2 and entrapment of particles in rough bottom are sufficient.

Water column report:

No outstanding issues. Minor comments:

1. The additional context around the hydrodynamics and nutrient supply is informative and probably as much as we can speculate at this point. However, still somewhat of a mystery and something to watch.
2. The further text on TN additions is helpful, thank you.

3. New Figures 18 and 19 are good, although I'd be inclined to standardize the colour ramps in relation to the values? Might require some fiddling to ensure that you can still discern changes at the lower end of the scale for some plots though? Just a suggestion.
4. Other responses seem sufficient

Nigel

From: Lacey Bragg
Sent: Monday, November 3, 2025 9:36:51 AM
To: Nigel Keeley <[REDACTED]>
Subject: FW: [External] Hananui Aquaculture Project - Draft conditions for your review comments

Kia roa Nigel,

Here is the response to your seabed review.

Lacey

From: Thomas Hildebrand <[REDACTED]>
Sent: Tuesday, 28 October 2025 3:03 pm
To: Lacey Bragg <[REDACTED]>
Subject: [External] Hananui Aquaculture Project - Draft conditions for your review comments
Importance: High

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Kia ora Lacey

Please see the attached Seabed AEE and Cawthron's responses to Nigel Keeley's review on behalf of Environment Southland. Apologies for the delay.

We are still on track to provide:

- The monitoring recommendations report by **Tuesday 28 October**
- Draft conditions by **Monday 3 November**

We are seeking stakeholder comments by **12pm, Monday 10 November**.

If you have any pātai, please don't hesitate to contact me.

Ngā mihi

Thomas Hildebrand

Marine Biologist

M: [REDACTED]



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