

## **Appendix H   Letters from consulted parties**



Tēnā koe Ethan,

## **Hananui Aquaculture Project – Pre-lodgement consultation under the Fast-track Approvals Act 2024 (FTAA)**

Thank you for your correspondence dated 27 May 2025 in relation to Ngāi Tahu Seafood Resources Limited's intention to lodge a substantive application for a listed project under the Fast-track Approvals Act 2024 (FTAA) in respect of the "Hananui Aquaculture" project.

As you are aware, the Ministry for the Environment (the Ministry) is the "relevant administering agency" for approvals relating to the Resource Management Act 1991 (RMA) and Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 (EEZ Act) under the FTAA.

We have received the information you provided on 27 May 2025. As part of your substantive application, you will need to provide an assessment of the project against any relevant national policy statement, national environmental standards and if relevant the New Zealand Coastal Policy Statement. The Ministry has prepared the following summary on the national direction made under the RMA, for your consideration.

### National Direction

Under the RMA, the government can create national direction to support local authorities' decision making under the RMA and develop a nationally consistent approach to resource management issues. This is typically done where an issue is of national importance, or involves significant national benefits or costs, or where necessary to give effect to other government policy or regulation. There are several types of national direction, including national policy statements and national environmental standards.

### National Policy Statements (NPS)

National Policy Statements are instruments issued under section 52(2) of the RMA. An NPS is a vehicle for the government to prescribe objectives and policies for matters which are relevant to sustainable management. All National Policy Statements currently in force are published on the Ministry's website and links are provided in the table below. It is recommended that you consider the relevance of each NPS to your project. If you are seeking an RMA approval, then under section 13(4)(y)(i) and schedule 5 paragraph 2 of the FTAA your application must include an assessment of your project against any relevant NPSs. Refer to the National Policy Statements linked below.

National Policy Statement	Description
<a href="#">National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat 2023</a>	This NPS provides nationally consistent policies and requirements for reducing greenhouse gas emissions from industries using process heat. It works alongside

	the National Environmental Standards for Greenhouse Gases from Industrial Process.
<a href="#">National Policy Statement for Highly Productive Land 2022</a>	This NPS provides national direction to improve the way highly productive land is managed under the RMA. The objective is to ensure the availability of New Zealand's most favourable soils for food and fibre production.
<a href="#">National Policy Statement for Freshwater Management 2020</a>	This NPS provides local authorities with updated national direction on how they should manage freshwater under the RMA.
<a href="#">National Policy Statement for Indigenous Biodiversity 2023</a>	This NPS provides direction to local authorities to protect, maintain and restore indigenous biodiversity requiring at least no further reduction in indigenous biodiversity nationally.
<a href="#">National Policy Statement for Renewable Electricity Generation 2011</a>	This NPS provides guidance for local authorities on how renewable electricity generation should be dealt with in RMA planning documents.
<a href="#">National Policy Statement on Electricity Transmission</a>	This NPS sets out the objective and policies for managing the electricity transmission network.
<a href="#">National Policy Statement on Urban Development 2020</a>	This NPS recognises the national significance of well-functioning urban environments. It removes barriers to development to allow growth in locations that have good access to existing services, public transport networks and infrastructure.
<a href="#">New Zealand Coastal Policy Statement 2010</a>	The NZCPS provides guidance for local authorities in their day-to-day management of the coastal environment. The NZCPS is the only compulsory NPS under the RMA.

### National Environmental Standards (NES)

National Environmental Standards are regulations issued under section 43 of the RMA. They prescribe technical and non-technical standards, methods or other requirements for land use and subdivision, use of the coastal marine area and beds of lakes and rivers, water take and use, discharges and noise. NESs require each local authority to enforce the same standard in respect of these areas unless otherwise specified. All National Policy Statements currently in force are published on the Ministry's website and links are provided in the table below. It is recommended that you consider the relevance of each NES to your project.

If you are seeking an RMA approval under the FTAA, section 13(4)(y)(i) and schedule 5 paragraph 2 require that an assessment of your project against any relevant NES must be included with your application. Refer to the National Environmental Standards linked below.

<b>National Environmental Standard</b>	<b>Description</b>
<a href="#">National Environmental Standards for Air Quality</a>	This NES prohibits discharges from certain activities and set a guaranteed minimum standard for air quality for people living in New Zealand.

<a href="#">National Environmental Standards for Commercial Forestry</a>	This NES provides nationally consistent regulations to manage the environmental effects of forestry.
<a href="#">National Environmental Standards for Electricity Transmission Activities</a>	This NES sets out which electricity transmission activities are permitted, subject to conditions to control environmental effects. They apply only to existing high voltage electricity transmission lines.
<a href="#">National Environmental Standards for Freshwater</a>	This NES regulates activities that pose risks to the health of freshwater and freshwater ecosystems.
<a href="#">National Environmental Standards for Greenhouse Gas Emissions from Industrial Process Heat</a>	This NES sets out nationally consistent rules for certain greenhouse gas emitting activities from industrial process heat.
<a href="#">National Environmental Standards for Marine Aquaculture</a>	This NES replaces regional council rules for existing marine farms and provides a more certain and efficient process for replacing consents, realigning farms and changing farmed species. In some instances, they allow regional council rules to remain in force.
<a href="#">National Environmental Standards for Sources of Human Drinking Water</a>	This NES sets requirements to protect sources of human drinking water from becoming contaminated.
<a href="#">National Environmental Standards for Storing Tyres Outdoors</a>	This NES provides nationally consistent rules for the responsible storage of tyres.
<a href="#">National Environmental Standards for Telecommunication Facilities</a>	This NES sets national rules regarding the deployment of telecommunications infrastructure across New Zealand.
<a href="#">National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health</a>	This NES includes requirements for assessing and managing potentially contaminated soil.

Please ensure your application includes a summary of this consultation with the Ministry, and an explanation of how this consultation has informed your project. This information must be included in your application, regardless of whether it is a referral application or a substantive application for a listed project.

Thank you for consulting with the Ministry for the Environment as the relevant administering agency for the RMA and the EEZ Act.

If you have any queries in relation to the FTAA process, please contact [info@fasttrack.govt.nz](mailto:info@fasttrack.govt.nz) for further assistance.

Ngā mihi,



**Acting General Manager, System Enablement and Oversight**



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PO Box 19  
BLUFF  
Southland  
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**25 November 2025**

**Ngāi Tahu Seafood Ltd**

6 Bolt Place

Christchurch 8053

By email: [REDACTED]

**Tēnā koutou e ngā rangatira,**

**RE: SUPPORT FOR HANANUI AQUACULTURE PROJECT**

Te Rūnanga o Awarua Incorporated Society is pleased to provide this letter in support of the lodgement of the Hananui Aquaculture Project (HAP) under the Fast-track Approvals Act 2024.

As kaitiaki and mana whenua for Te Ara a Kiwa, Awarua Rūnaka holds enduring responsibilities to safeguard the cultural, environmental, spiritual, and economic wellbeing of our takiwā and our people. We acknowledge the long history of engagement on this kaupapa between Ngāi Tahu Seafood (NTS) and Ngāi Tahu ki Murihiku, including Awarua, Waihopai, Ōraka Aparima, and Hokonui, and the re-establishment of the Manawhenua Working Group to guide this next phase.

Over several years, we have engaged directly with NTS on the design and refinement of the proposal, including reviewing technical assessments, environmental reports, and cultural considerations. The information provided has given us confidence that the matters of most importance to mana whenua, including benthic health, taoka species, seabirds, cumulative effects, and monitoring frameworks, have been considered thoroughly, with advice from both scientific experts and cultural practitioners.

**Cultural and Environmental Considerations**

Awarua Rūnaka acknowledges:

- the integration of Ngāi Tahu values throughout the project design,
- responsiveness to concerns raised during previous rounds of consultation,
- a clear commitment to ongoing involvement of mana whenua throughout implementation, monitoring, and adaptive management.

This aligns with our expectations for upholding rangatiratanga, kaitiakitanga, and our long-standing relationship with Te Ara a Kiwa.



### **Economic, Social, Workforce and Wellbeing Benefits**

We also recognise the significant opportunity this project presents for Murihiku, including:

- generation of high-quality employment for whānau,
- workforce development pathways for rangatahi,
- increased regional economic activity and long-term industry stability,
- opportunities for co-design of research, environmental monitoring, and mātauranga integration, and
- intergenerational benefits aligned with our aspirations for whānau wellbeing and sustainable regional growth.

These benefits are important to our Rūnaka and consistent with our aspirations for building a resilient, thriving Murihiku economy grounded in our cultural values.

### **Support in Context of the Customary Marine Title Application**

Awarua Rūnaka understands that Te Rūnanga o Ngāi Tahu will respond as the formal Customary Marine Title applicant on behalf of the iwi. We are comfortable with the Hananui application proceeding in this context and confirm our support for the project within our takiwā.

### **Conclusion**

On this basis, Te Rūnaka o Awarua Incorporated Society affirms its supports for Ngāi Tahu Seafood in lodging the Hananui Aquaculture Project under the Fast-track Approvals Act 2024. We remain committed to ongoing involvement in the next stages of this significant kaupapa for Murihiku and to ensuring its outcomes reflect the values and aspirations of mana whenua.

**Ngā mihi nui,**



Pania Coote

Kaiwhakahaere / Chairperson

**Te Rūnaka o Awarua Incorporated Society**



Environmental Protection Agency  
Ministry for the Environment

To whom it may concern,

## Hananui Aquaculture Project

Invest New Zealand is the Government's investment attraction agency. The Invest NZ team originates, prepares, and connects investment opportunities to investors that accelerates the economic growth of New Zealand. Invest NZ works alongside New Zealand Trade and Enterprise whose purpose is to grow companies internationally for the good of New Zealand,

Aquaculture has been identified as key growth sector for the economy and is a key contributor to doubling New Zealand's exports.

Invest NZ has supported Ngāi Tahu Seafoods Hananui Aquaculture Project since 2022 providing market feasibility assessments and investment collateral advice.

Salmon aquaculture is expected to grow exponentially over the next two decades as Open Ocean and RAS systems develop in New Zealand. Critical to this growth is the timely consenting of water space to enable the economic benefits to be realised.

This project will be New Zealand's largest Open Ocean salmon farm and will be the catalyst to enable further sustainable growth of the sector. The scale of the project will contribute significantly to the economy through both the investment and export value, estimated to be over \$500M.

Beyond its direct impact on the sector, the project is expected to stimulate significant investment and growth across a range of upstream and supporting industries. These include the development and expansion of hatcheries, feed mills, and processing facilities. Additionally, the project will drive investment in port infrastructure, including cold storage, logistics, and export capabilities, enhancing regional connectivity and efficiency. This integrated value chain not only strengthens the economic viability of the aquaculture sector but also creates opportunities for innovation, job creation, and regional development.

Invest NZ supports an application to your office regarding this project, due to its direct and indirect economic impact.

Invest NZ and NZTE will continue to support Ngāi Tahu Seafoods in the development of their Hananui Aquaculture Project.

Kind Regards,



Simon Ansley  
Investment Director  
Invest New Zealand



**Kathryn Molloy**

Chief Executive Officer  
79 Wallacetown Lorneville Hwy,  
Invercargill, 9874

**Mr Thomas Hildebrand**

Ngāi Tahu Seafood Limited  
6 Bolt Place / PO Box 3787  
Christchurch, New Zealand

18 November 2025

Tēnā koe Thomas,

**Re: Conditional Support for the Hananui Offshore Aquaculture Proposal**

The CRA8 Rock Lobster Industry Association Inc. writes in relation to the Hananui Aquaculture Project, recently advanced into the Government's Fast-Track Approvals process. We acknowledge Ngāi Tahu Seafood's engagement with industry stakeholders and your willingness to share updated layout, assessment, and navigational safety material during the development phase.

After reviewing the revised offshore farm configuration and associated technical information, the Association confirms its support for the project subject to the full retention and implementation of the proposed navigational lighting and marking system.

**Industry Position**

1. No material impact on CRA8 commercial activity  
The proposed blocks are located offshore of Murray Beach in an area with negligible rock lobster potting activity. Displacement effects are therefore minimal, and potting activity around the perimeter remains feasible.
2. Appropriate offshore siting and environmental separation  
The project avoids sensitive benthic features and areas used for juvenile habitat. The spacing between farm blocks supports vessel operations and reduces interactions with other marine users.
3. Constructive partnership with mana whenua  
Ngāi Tahu Seafood is an important regional partner whose activities contribute to Southland's marine economy. CRA8 recognises the project's alignment with iwi development aspirations, provided operational safety standards are met.

**Condition: Navigational Lighting and Marking**

The Association is aware that some submitters have called for reduced lighting on offshore structures for visual-amenity and seabird reasons. For CRA8, this is not acceptable.

The Hananui structures will sit in a high-energy, high-traffic area of Foveaux Strait where commercial fishing vessels, tourism operators, the Bluff ferry, and recreational craft routinely operate in low visibility, rough weather, and at night. Unlit offshore infrastructure in these conditions presents a significant navigational hazard.



Accordingly, CRA8's support is conditional on the project maintaining the full navigational lighting and marking package described in the application, including:

- Lit cardinal marks,
- Lit perimeter buoys on pen corners,
- Properly lit feed barges and associated structures,
- Compliance with relevant maritime and international standards, and
- Ensuring the final configuration is appropriately charted.

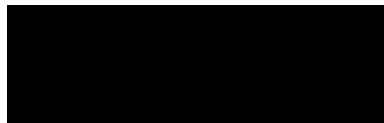
This requirement is fundamental to vessel safety and must remain in place for the duration of the project.

### **Conclusion**

Subject to the above condition, CRA8 supports the Hananui proposal and is comfortable indicating this position as part of the Fast-Track process. We will continue to engage constructively as the project progresses.

Please contact me if any clarification is required.

Nāku noa, nā



**Kathryn Molloy**

Chief Executive Officer

CRA8 Rock Lobster Industry Association Inc.



19 September 2025

## **The Hananui Aquaculture Project under the Fast-Track Approvals Act 2024**

Kia ora Thomas

Many thanks for sharing the draft characterisation and assessment of potential impacts on commercial fishing that Ngai Tahu has commissioned to support the application. We are treating this as a confidential draft as requested. We appreciate the chance to view the draft and comment.

PāuaMAC 5 is a regionally based industry representative organisation funded by way of a Primary Industry Commodity Levy.

The organisation acts for the owners of pāua quota and ACE in PAU 5A, PAU 5B and PAU 5D, as well as fishing vessel operators, processors, fish dealers and harvesters who operate in the PAU 5 fisheries. As you know Ngai Tahu is a significant quota owner and participant in these southern pāua fisheries.

We have followed with interest the Ngai Tahu proposal to develop an offshore salmon farm in Foveaux Strait from the beginning and were disappointed to see the expert panel convened by the EPA decline the application in 2023.

We support the current application fully.

- It will provide a very welcome boost to the Southland economy
- provide direct and indirect employment opportunities to the immediate region especially in Bluff, Invercargill and on Rakiura.
- and help nationally to drive export growth for New Zealand.

For the local pāua industry working Rakiura waters it will have no significant environmental and only minor possible fisheries impact issues. In the development and operational stages we believe it may well represent an opportunity for our divers and crews to find supplementary or off season work.

We identify two issues we would like to discuss further with the applicant

- 1) Farm worker recreational fishing implications - The Rakiura pāua fishery, PAU5B, is a valuable one. The commercial part of the fishery is carefully managed and is considered to be in a healthy and sustainable state. For example we ensure a large standing biomass of adults to ensure high recruitment success by maintaining sustainable catch limits and by use of a high minimum harvest size (up to 142mm compared to the minimum legal size of 125mm).

One of the major threats to any abalone fishery is localised serial depletion. We are concerned that in the development and operation of Hananui that staff and support workers will be enabled to apply recreational fishing effort to nearby pāua beds both for immediate consumption and as “take homes”. This is not fishing effort that would otherwise happen in the area. Over time this is likely to impact sustainability. We believe this issue could be addressed by way of a code of practice developed by Ngai Tahu for the farm and we would appreciate the chance to discuss this further.

- 2) Shark interactions – The area that the farm is to be sited is home to populations of sharks, White Pointers and Seven Gill. Obviously as our crews are free diving there is a high awareness of any risk factors around sharks in our industry. Your characterisation and impacts assessments cover this issue well (Diver safety, p.40) and notes that it will also be an issue for your own support divers. Once again we believe a code of practice could manage possible shark interaction risks and we would like the chance to discuss that also.

Once again thank you for the chance to provide comment. We note that both the issues we raised are addressed in the 'placeholder' conditions proposed in the report, and we would support the inclusion of those conditions in the application.

Notwithstanding these two issues, PauaMAC5 reiterates its support for the project.

Nga mihi

Storm Stanley – manager PāuaMAC5