

11 February 2026

TO:
Fast Track Application Team
REF: CRM:0139009024

**RE: Invitation to Comment Fast Track Application
North Western Mussels Limited (NWML) - Waikato West Coast Mussel Spat Nursery.**

Kia ora koutou,

Introduction

1. Aquaculture New Zealand (AQNZ) appreciates the opportunity to comment on the Fast Track Application submitted by North Western Mussels Limited (NWML) for a proposed Greenshell™ mussel spat catching and nursery facility off the Raglan/Whāingaroa coast.
2. AQNZ is the industry body representing New Zealand's aquaculture sector, funded through a commodity levy. The sector includes Greenshell mussels™, King salmon, and Pacific oysters, contributing approximately \$840 million in combined domestic and export earnings in 2025 and employing over 3,000 people in regional communities.
3. AQNZ has engaged with the Coromandel Marine Farmers Association (CMFA) regarding the proposed Fast Track application and its perspectives. The CMFA represents mussel and oyster farmers operating throughout the Hauraki Gulf, with primary activity around the Coromandel Peninsula and Waiheke Island. Its key areas of interest include the Coromandel, Thames Coast, Waimangu Point, East Auckland, and Waiheke Island. The CMFA also works closely with oyster farmers in Mahurangi Harbour, who make up the remaining aquaculture operations within the Hauraki Gulf.
4. The Coromandel Marine Farmers Association (CMFA) supports the views of AQNZ outlined in this letter.
5. Aquaculture has been recognised by the Government as a key primary sector to accelerate economic growth for the benefit of New Zealand. The Government's Aquaculture Development Plan 2025 aims to grow New Zealand's aquaculture industry to \$3 billion in annual sales by 2035. This goal is aligned with the broader government target of doubling the value of New Zealand's exports in ten years. The plan sets out how Government will accelerate the aquaculture sector, including by removing regulatory barriers to growth.

6. The Minister for Oceans and Fisheries, Hon. Shane Jones, has recently challenged the aquaculture sector to lift its ambition beyond the existing \$3 billion target and instead aim for a scale comparable to New Zealand's beef industry. Meeting this challenge will require regulatory settings and project approval processes that actively enable sector growth and commercial performance. These elements are essential to de-risking the industry, securing ongoing investment, supporting workforce attraction and retention, and contributing to economic prosperity for New Zealand and its regional communities.
7. Fast Track projects such as the North Western Mussels Limited (NWML) proposal for a Greenshell™ mussel spat catching and nursery facility off the coast of Raglan/Whāingaroa represent an important enabler for the sector. By strengthening the supply of critical inputs and reducing operational uncertainty, initiatives like this play a key role in supporting industry resilience and future development.
8. In April 2023, AQNZ provided a letter of support for this project, noting its potential to contribute to the mussel industry's productivity and resilience goals. The letter also highlighted the significant opportunity that Greenshell™ mussels represent for Aotearoa New Zealand, while underscoring that further progress depends on addressing the industry's priority need to improve the security of mussel spat supply.
9. Spat retention challenges across the industry—particularly in the Coromandel—are becoming increasingly urgent and have significant implications for aquaculture productivity and long-term resilience. This submission emphasises the ongoing importance of initiatives like this project, which aims to supply mussel spat and seed in conditions and at times that maximise their survival when transferred to the farming environment. The project also creates opportunities to provide nursery space for hatchery spat. It should be considered alongside complementary efforts, including hatchery developments, that collectively contribute to de-risking and future-proofing the New Zealand mussel industry.

Sector context

Greenshell™ Mussel Value Proposition – Evidence Overview

10. Greenshell™ mussels contribute significantly to New Zealand's aquaculture output, generating approximately \$390 million in export earnings in 2024. Multiple environmental assessments, including the Monterey Bay Aquarium's Seafood Watch programme, identify mussel farming as having comparatively low environmental impacts. Shellfish aquaculture has also been researched extensively in New Zealand, with long term monitoring datasets informing regulatory and environmental management frameworks .
11. While opportunities for further sustainable growth exist, overall sector output has plateaued and, in some areas, such as the Coromandel, declined. In this context, improved spat reliability is regarded as a key enabler for re establishing production levels.

Spat Supply as Critical Driver

12. MPI's publication Enabling Spat Nurseries to Grow New Zealand's Mussel Sector notes that only a very small proportion of wild spat grown in sub optimal environments survives to seed stage. Optimised nursery sites—either land or sea based—are therefore important for improving survival rates and supporting consistent production, noting that sea based nurseries can cultivate larger seed at scale.

13. The West Coromandel mussel farming industry experienced a catastrophic mortality event of mussel spat in late 2021. The regional spat mortality event has exacerbated an industry wide challenging situation. More reliable, consistent sources of spat are needed if the aquaculture industry is to maintain its present volumes, and more spat will be needed for the industry to grow. The AQNZ Mussel Spat Strategy¹ identifies the following three goals for the industry:
 - a) Secure and diversify spat supplies
 - b) Optimise spat use (retention)
 - c) Increase hatchery production.
14. The spat mortality event of 2021 could have been caused by stress and unfavourable conditions from high marine sea temperatures observed at the time². Losses of spat have increased over the last 30 years, but reasons remain unclear and may be due to environmental changes³. Spat challenges are likely to continue or worsen for the industry.
15. The NWML application shows that, over the past ten years, spat collection from the proposed area has consistently produced large quantities of spat. It also demonstrates that this spat can be grown at scale to seed sizes that are resistant to snapper predation—a problem that is currently affecting Coromandel farms. If these findings are confirmed through the consenting process, the proposal could make a meaningful contribution to the availability of seed mussels for existing farms across parts of the North Island.
16. Iwi involvement and aspirations in aquaculture continue to expand, and infrastructure that enhances reliability of spat supply may contribute to the viability of both current and future Māori aquaculture assets. AQNZ acknowledges that iwi perspectives, rights, and interests will be key considerations for decision makers.

Environmental Stewardship

17. Environmental effects remain a core component of any aquaculture consent process. Over the past two decades, scientific research and monitoring associated with marine farming consents have substantially increased understanding of environmental interactions. Many datasets now extend 30 years or more, contributing to confidence regarding environmental effects at both local and regional scales.
18. AQNZ recognises that the proposed NWML site is within an area of Māui dolphin habitat. This requires careful assessment, including potential interactions, operational risks, and mitigation frameworks. Although mussel farms also operate without issue in other regions where Hector's dolphins are present, site-specific evaluation remains essential. Industry best practice frameworks, such as the A+ Sustainable Management Programme, provide guidance for risk mitigation, but final assessments rest with technical experts and the consenting authority.

¹ NZ Greenshell Mussel Spat Strategy 2020 (<https://www.aquaculture.org.nz/resources/general>)

² <https://www.moanaproject.org/news/severe-marine-heatwave-off-west-coast-north-island-saturdays-outlook>

³ Skelton, B., Jeffs, A. 2021. The loss of spat following seeding onto coastal Greenshell™ mussel (*Perna canaliculus*)

Conclusion

19. There is no single solution to New Zealand aquaculture's mussel spat challenges; however, the industry needs to be able to trial, research and develop alternative practices and locations to improve mussel spat supply, productivity, and resilience.
20. AQNZ considers that the NWML Fast Track Referral application presents potential benefits for improving spat supply reliability, delivering robust seed when it is needed for survival, and supporting sector resilience at a regional and national scale. These potential benefits must be weighed against environmental, cultural, and technical considerations, which are appropriately the responsibility of the Fast Track decision making process.

Ngā mihi,



Teena Hale Pennington
Chief Executive

Cc. Chair, Stephen Hand, Coromandel Marine Farmers Association (CFMA)