

Before a Hearings Panel
Appointed by the Otago Regional Council

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions on the Proposed
Otago Regional Policy Statement (non-freshwater
parts)

by: **Sanford Limited**
Submitter #122

Summary Statement of Alison Undorf-Lay

Dated: 8 May 2023

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INTRODUCTION

- 1 My full name is **Alison Elizabeth Undorf-Lay**. I am authorised to present this evidence on behalf of Sanford Limited (*Sanford*).
- 2 I have worked for Sanford for 12 years and am a senior manager working across the company's aquaculture businesses.

SUMMARY

- 3 Sanford is a publicly listed seafood company, 80% of its shareholders are New Zealanders or New Zealand companies.
- 4 Sanford has both wild harvest (fishing) and aquaculture interests. Sanford's interest in the matter of the proposed Otago Regional Policy Statement (*pORPS*) is in relation to its aquaculture interests. Sanford has aquaculture investments (marine farms, hatcheries and processing plants) in six regions of New Zealand and has had salmon farms in Big Glory Bay - Rakiura Stewart Island for more than 25 years.
- 5 Currently in Otago, Sanford has a freshwater salmon hatchery on the Clutha River at Kaitangata, and an open ocean salmon farm application north east of Otago Peninsula.

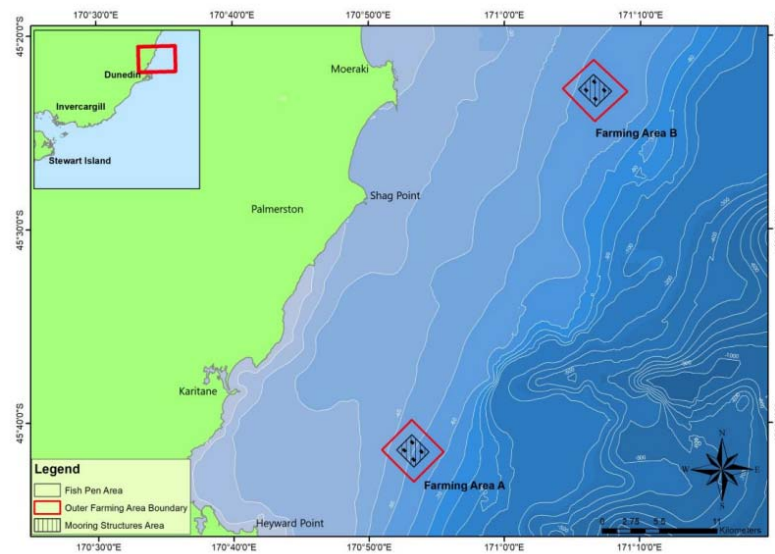
Aquaculture growth

- 6 Sanford has been looking for new waterspace to grow its King salmon business since about 2017. After much work in 2020 Sanford lodged an application to establish an open ocean salmon farm north east of Otago Peninsula, which the company has nominally called Project East.
- 7 Project East is one of four offshore aquaculture sites in New Zealand which are currently seeking approvals under the RMA.¹ The Project East application includes Two Farming Areas that at full development will produce 25,000 GWT² annually of King Salmon. The areas are shown on **Map One** below:

¹ The first of these applications, New Zealand King Salmon OOA Blue Endeavour farm was approved in 2022.

² GWT is the weight of the fish before any processing occurs.

Map One: Project East Two Farming Areas



- 8 The Project East application is currently on hold while Sanford and its team of experts respond to requests for further information issued by the Otago Regional Council.
- 9 During this period, Sanford staff have been engaging and consulting with Kai Tahu Rūnaka and the host rural communities along the Otago east coast. Despite what to some may seem like a slow pace, Sanford believes it is important for the enduring success of the project to gain the support of our host communities because they will be neighbours and ultimately where our work force and their families will live.
- 10 Sanford anticipates that its Project East application will be publicly notified in the third quarter of 2023.

In line with Government strategy

- 11 There is no doubt that Project East and its components (such as the hatchery, processing plant and contractor servicing) will make a significant positive contribution towards implementing the government's aquaculture growth strategy and regional economic development goals in the lower South Island.
- 12 Sanford is confident that like our existing Big Glory Bay sea farms, Project East will produce a sustainable healthy food protein year on year.

Proposed Otago Regional Policy Statement

- 13 In my evidence in support of Sanford's submission I explained the work that Sanford undertook to ensure that the chosen new farm sites are suitable from an operational and environmental perspective. This work took almost two years.

- 14 The Project East application has been built up over time as a series of consequential steps that began with understanding the environment and RMA planning constraints for the area and has led into the farm design and then engineering plans to support the pen construction and moorings. This was not a low-cost exercise.
- 15 Because Sanford has invested so much into this application it was deeply concerning when new SNA provisions were included in the pORPS which were much more restrictive and uncertain than those required by the New Zealand Coastal Policy Statement 2010 (NZCPS). The proposition in an earlier officer's report that all effects on taoka species be avoided was also of concern due to its potentially widespread implications for development. This has been a significant distraction to Sanford's open ocean plans.
- 16 I understand from Ms Giles and Mr Low that the provisions now being proposed by the officers remove some of this uncertainty and would bring the planning framework for managing biodiversity in Otago's coastal environment back into line with the direction contained in the NZCPS.
- 17 Sanford strongly supports this shift in the planning direction, and it is important for us that this is retained so we can move forward with confidence into the next stage of the Project East consenting process.

CONCLUSION

- 18 Thank you for this opportunity to speak. My submission represents the view of Sanford. Sanford supports the relief proposed in the evidence of **Mr Low** and **Ms Giles** and the legal submissions of **Ms Appleyard**.
- 19 Sanford has appreciated the opportunity for collaboration amongst the relevant stakeholders and Otago Regional Council staff to refine the proposed provisions.

Dated: 8 May 2023

Alison Undorf-Lay