

Technical Advice - herpetofauna by Dr Graham Ussher

Date	1 September 2025
To	Ellie Watson, Environmental Manager – South Island Renewables, Genesis Energy
From	Dr Graham Ussher, RMA Ecology Ltd
Project advice provided for	Tekapo Power Scheme – Applications for Replacement Resource Consents
Documents referred to	RMA Ecology Ltd. December 2023. Tekapo Power Scheme reconsenting, Tekapo: herpetofauna effects assessment. Report prepared for Genesis Energy Ltd, Auckland. 36 pages + Appendices. Canterbury Regional Council planning advice comments, dated 8_25 August 2025 Statement of evidence of Michael Harding. 18 August 2025. Terrestrial Ecology, on behalf of The Royal Forest and Bird Protection Society of New Zealand. For FTAA-2503-1035 Statement of evidence of Kathryn McArthur. 22 August 2025. Aquatic ecology and water quality on behalf of The Royal Forest and Bird Protection Society of New Zealand. For FTAA-2503-1035
Qualifications	PhD in restoration ecology, 35 years experience with New Zealand herpetofauna, holder of approx. 20 Authorities from the Department of Conservation for survey and salvage/ relocation of lizards across New Zealand.
Code of Conduct	As an expert witness I have read, and I am familiar with, the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. This memorandum has been prepared in compliance with that Code. In particular, unless I state otherwise, this response is within my area of expertise and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.
Signature	

1. Canterbury Regional Council Comments

I have reviewed the comments prepared by Canterbury Regional Council dated 25 August 2025 and my assessment (RMA Ecology, December 2023) still stands.

I note the following in response to Canterbury Regional Council's comments:

- There are no wetlands or deltas within the direct effects footprint in which to survey lizards. The available range of habitats within the affected footprint of the scheme were thoroughly assessed using an appropriate range of survey methods.
- Cryptic lizard species were surveyed, as is discussed in the Herpetofauna report; Arboreal jewelled geckos were assessed through standard daytime visual surveys. For

larger skinks there is no appropriate habitat within the direct effects footprint. Confirmation of large skink presence was confirmed by observing Mackenzie basin skink in nearby areas outside of the project footprint

- The assessment of effects on native lizards has not 'just jumped straight to compensation' as is stated in the Canterbury Regional Council comments report. The effects assessment followed best practice by considering avoidance (none possible), the underlying existing environment (management of the river as it is currently operated), and mitigation. The level of effect on native lizards is so small as to be negligible, and therefore does not trigger any requirement for offsetting or compensation.
- Dr Tocher (as identified in Appendix 2 on pages 37 and 38 of the CRC comments document) disagrees that PRR has been good for lizards and states that no data supporting Genesis conclusions has been provided. The benefits identified by the PRR mostly relate to increased knowledge through funding surveys by the Department of Conservation of rare lizards.
- Dr Tocher also considers that a 'business as usual' approach in terms of predator control will not help lizards, and assumes that predators such as rats are always present which isn't always the case. In any case PRR has targeted rats, and I understand that predator trapping will be a focus of the enhanced IBEP.
- The IBEP strategy would benefit from input from a herpetologist to assist with identifying research or management avenues; however, based on the anticipated level of effect from the scheme on lizards, there is no need to require IBEP resourcing to provide benefits to address adverse effects; any resourcing and consequential benefits should be regarded as voluntary.

2. Forest and Bird Comments

I have read the submission comments by Forest and Bird, and the accompanying statement of evidence by Mr Harding.

There is no reference to native lizards in those documents, and therefore I provide no comment on those documents.

I have reviewed the four flow options identified by Ms McArthur in her evidence (paragraph 95), and in my opinion the IBEP programme as proposed will deliver better ecological outcomes for lizards than any of the flow options suggested by Ms McArthur.