

NEW ZEALAND

CONSERVATION AUTHORITY
TE POU ATAWHAI TAIAO O AOTEAROA

Your Comment on the Wellington International Airport Southern Seawall Renewal project draft conditions

Please include all the contact details listed below with your comments on the draft conditions and indicate whether you can receive further communications from us by email to substantive@fasttrack.govt.nz.

1. Contact Details			
Please ensure that you have authority to comment on the draft conditions on behalf of those named on this form.			
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Please provide your comments below, include additional pages or attachments as needed.

Thank you for your comments

Wellington International Airport Southern Seawall Renewal project draft conditions

Targeted Refinement of Wildlife Approval Conditions

Memorandum to the Panel – Wildlife Approval Conditions

This memorandum provides a concise justification for a small number of targeted amendments to the Wildlife Approval conditions for lizards and kororā. The proposed amendments introduce an explicit requirement for baseline ecological monitoring and clarify how that baseline is to be used within the existing management, monitoring, and review framework. The amendments are deliberately limited in scope and are intended to give practical effect to matters already identified in the Panel’s draft decision, rather than to introduce new substantive obligations.

The draft decision records consistent concern from submitters, including the Wellington Conservation Board, the New Zealand Conservation Authority, and Greater Wellington Regional Council, regarding the need for measurable ecological outcomes, defined monitoring frameworks, and clear adaptive management triggers. These concerns are acknowledged in the decision, particularly in relation to the need to demonstrate biodiversity gain, assess success over time, and ensure that adaptive management is not discretionary. However, while monitoring and adaptive management are provided for through the Lizard Management Plan and Kororā Management Plan, there is no explicit requirement to establish baseline ecological conditions against which those measures can be assessed.

In the absence of baseline data, the effectiveness of the existing conditions is materially constrained. Monitoring can record activity and change, but cannot determine whether outcomes represent improvement, stability, or decline. Similarly, adaptive management triggers cannot be meaningfully defined or applied without a reference point. The proposed amendments address this gap by requiring baseline ecological surveys prior to disturbance and by linking subsequent monitoring, reporting, and review back to those baseline conditions. This creates a coherent and functional framework in which baseline conditions inform performance indicators, monitoring assesses change, and review mechanisms evaluate whether outcomes are being achieved.

Importantly, the amendments do not alter the structure of the Wildlife Approval or displace the role of the management plans. The Lizard Management Plan and Kororā Management Plan remain the primary delivery mechanisms for technical detail and implementation. The amendments simply clarify that those plans must be informed by baseline conditions and that monitoring and reporting must be expressed relative to those conditions. This approach is consistent with the Panel’s reliance on management plans while strengthening the certainty and enforceability of the overall regime.

The amendments are also proportionate and legally robust within the FTAA framework. They are directly related to the ecological effects of the authorised activities, are sufficiently certain to be enforceable, and are reasonable in that they reflect standard ecological practice for relocation and mitigation of protected species. Establishing baseline conditions is a routine and widely accepted

component of ecological management, particularly where long-term outcomes and population viability are in issue.

From a policy and statutory perspective, the amendments align with the purpose of the Wildlife Act 1953, which is concerned with the protection of indigenous wildlife, including maintaining population viability over time. They also give practical effect to the conservation outcomes sought by submitters and reflected in the decision, including the expectation of measurable biodiversity gain, ongoing monitoring, and adaptive management that responds to ecological performance rather than procedural compliance alone.

In summary, the proposed amendments represent a modest but important refinement. They do not expand the scope of the approval or introduce new effects management requirements. Rather, they ensure that the monitoring and adaptive management framework already contemplated by the Panel can operate as intended, by providing a clear and measurable reference point. This improves transparency, accountability, and ecological integrity, and supports a more robust and defensible outcome for both lizards and kororā over the life of the Project.

TRACKED AMENDMENTS

1. LIZARDS – SCHEDULE 3

NEW CLAUSE – 1.2 GENERAL

[EXISTING:]1.1 The Authorised Activity must be carried out in accordance with the...

[ADD:] 1.2 For the avoidance of doubt, compliance with those documents does not in itself constitute compliance with this approval unless ecological outcomes informed by baseline conditions are achieved.

NEW CLAUSE – 1.3 GENERAL

[ADD:] 1.3 Prior to any vegetation clearance, habitat disturbance, or lizard salvage, baseline ecological surveys must be undertaken to the satisfaction of the Director-General.

The baseline surveys must:

- (a) Identify species present and their distribution;
- (b) Establish population estimates or relative abundance;
- (c) Characterise habitat quality and extent.

The results must be used to:

- (i) Inform the Lizard Management Plan; and
- (ii) Provide a reference point for post-relocation monitoring.

NEW CLAUSE – 2.2 AMENDMENTS TO THE LIZARD MANAGEMENT PLAN

[ADD:] 2.2 Any amendment must remain consistent with baseline ecological conditions and associated performance monitoring.

[RENUMBER EXISTING] 2.3 The Wildlife Approval Holder must submit, in writing, any minor ...

[RENUMBER EXISTING] 2.4 For the purpose of this condition 2, a 'minor amendment' is either ...

NEW CLAUSE 8.2 REPORTING

[ADD:] 8.2 Reporting must include an assessment of monitoring results relative to baseline ecological conditions, including whether population trends are stable, increasing, or declining.

AMENDMENT 10.1 REVIEW

[EXISTING:] The Wildlife Approval Holder must review the LMP ... The purpose of the review is to reassess habitat conditions and characteristics

[ADD:] including evaluation of ecological outcomes relative to baseline conditions and whether adaptive management measures are required

, and update the LMP to reflect current species knowledge, best practice lizard management and mitigation techniques.

2. KORORĀ – SCHEDULE 3

AMENDED CLAUSE – 1.2 GENERAL

[EXISTING:] Capture, handling, marking and relocation methods must involve only techniques that minimise the risk of infection or injury to the animal and shall follow those described in the KPMP,

[ADD:] and be undertaken in a manner that enables monitoring of ecological outcomes relative to baseline conditions.

NEW CLAUSE – 1.3 GENERAL

[ADD:] 1.3 Baseline Ecological Monitoring – Kororā

Prior to relocation of kororā, baseline data must be established to the satisfaction of the Director-General, including:

- (a) Number of breeding pairs;
- (b) Nest occupancy rates;
- (c) Breeding success indicators.

This baseline must be used to inform monitoring under the Kororā Management Plan.

[RENUMBER EXISTING:] 1.4 The Wildlife Approval Holder is permitted to incidentally kill or ...

NEW CLAUSE 2.2 AMENDMENTS TO THE KORORĀ ..

[ADD:] 2.2 Any amendments must remain consistent with baseline ecological conditions and associated monitoring requirements.

[RENUMBER EXISTING] 2.3 The Wildlife Approval Holder must submit, in writing, any minor ...

NEW CLAUSE – 5.2 REPORTING

[ADD:] 5.2 Reporting must include assessment of colony performance relative to baseline conditions, including occupancy and breeding outcomes where available.

AMENDMENT CLAUSE – 7.1 REVIEW

[EXISTING:] The Wildlife Approval Holder must review the KPMP ... The purpose of the review is to reassess habitat conditions and characteristics,

[ADD:] including assessment of whether colony performance is maintaining or improving relative to baseline conditions

, and update the LMP to reflect current species knowledge, best practice lizard management and mitigation techniques.