

17 June 2026



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Dear [REDACTED],

Thank you for your letter dated 10 June 2026, regarding the Twizel Solar Project from Nova Energy Limited (Nova).

Please find below the response from the Canterbury Regional Council (CRC) on considerations of the completeness of the Applicant's Substantive Application ('application' or 'SA') under the Fast-track Approvals Act 2024 (FTAA).

SUMMARY AND KEY CONCERNS

CRC considers that the application is complete in accordance with Schedule 5 of the FTAA. Attachments 1-5 to this letter provide detailed assessment of the application supporting this conclusion.

The feedback provided in the Attachments is not considered unexpected for a project of this scale and significance. It is anticipated that the outstanding matters can be addressed through the next stages of the Fast-track process by working collaboratively with the Applicant.

The following are areas CRC considers would be beneficial for the Applicant to address.

1. Appropriately addressing adverse ecological effects and compensation requirements (esp. avifauna) upfront rather than relying on adaptive management conditions to define the level of appropriate compensation after granting of consent (if granted).
2. Improving conditions in order to adequately address the full suite of potential adverse effects of the activity. To the extent appropriate, achieving consistency with comparable solar farm condition sets is recommended to achieve this.
3. Confirming compliance with the relevant permitted activity rules.

Further detail on these matters is provided in Attachment 1 below.

As noted above, CRC acknowledges the similarity with two other solar farm proposals being considered by an Expert Panel under the FTAA. CRC recommends that the Applicant take learnings from the publicly available information, expert commentary, and outcomes regarding the conditions associated with those proposals and apply them to this application where relevant. This would provide greater consistency for any Expert Panel considering the

application and assist in demonstrating that the application has appropriately addressed matters arising from proposals of a similar nature and location.

We trust that this information assists the EPA in determining whether Nova's substantive application is complete and within scope, in accordance with section 46(1) of the Fast-track Approvals Act 2024.

Please advise if you need any further clarification on any matters raised in this letter. We look forward to working with you further on this application if it is considered to meet section 46(1) of the Act.

Ngā mihi nui,

A handwritten signature in grey ink, appearing to read 'Anna Stewart'.

Anna Stewart

Team Leader Consents Planning - Significant Consents

LIST OF ATTACHMENTS

Attachment 1: Canterbury Regional Council comments under s46 FTAA

Attachment 2: CHECKLIST A – Resource consent, change to or cancellation of a resource consent

Attachment 3: CRC Technical Advice Summary

Attachment 4: CRC Section 30 Response

Attachment 5: Indigenous Biodiversity Technical Advice

ATTACHMENT 1: CANTERBURY REGIONAL COUNCIL COMMENTS UNDER S46 FTAA - TWIZEL SOLAR PROJECT

Specific questions from the EPA

Confirm that the written notice prepared by Council remains accurate at the time of receiving this letter.

CRC can confirm that the information contained in the written notice dated 10 March 2026 remains accurate as at the date of this letter. A copy of the written notice is provided as Attachment 4.

The substantive application includes applications for the following approvals under the Resource Management Act 1991 (RMA) that CRC is the relevant consent authority for: a resource consent that would otherwise be applied for under the RMA (section 42(4)(a) of the FTAA).

Based on the information provided in the substantive application (and its Appendices), CRC considers that the Canterbury Land and Water Regional Plan (CLWRP) would apply.

Consents under the RMA that would be administered by CRC:

- a. Section 9 - Land use consent for earthworks over an aquifer. The applicant identified that earthworks contained in this proposal will not meet the conditions of permitted activity Rule 5.175 and therefore will fall under Rule 5.176 as a restricted discretionary activity.
- b. Section 15 - Discharge consent for construction phase stormwater. The applicant has identified the discharge of construction phase stormwater will not meet Rule 5.94A and therefore will fall under Rule 5.94B as a restricted discretionary activity.
- c. Section 15 - Discharge consent for operational phase stormwater. The applicant has identified the discharge of operational phase stormwater will not meet Rule 5.96 therefore will fall under Rule 5.97 as a discretionary activity.

Regarding other applicable permitted activity rules, CRC notes the applicant has not provided a detailed assessment against the conditions of the rules. Rather the Applicant has only stated that they comply. To confirm compliance, the Applicant should provide detailed demonstration that the conditions of the permitted activity rules are met to ensure no further consents are required.

However, CRC considers that, based on our understanding of the proposal, the Applicant has correctly identified the relevant planning documents and has assessed the proposal against the relevant planning provisions..

CRC understands that the applicant has applied for a duration of 35 years and a 10-year lapse date for all regional consents. CRC considers the duration sought to be in line with section 123B¹ of the RMA.

¹Section 123B Duration of consent for renewable energy and long-lived infrastructure, Resource Management Act 1991

Whether that substantive application made available to CRC, meets the requirements of sections 42 and 43 of the FTAA and is provided in sufficient detail to satisfy the purpose for which it is required in accordance with section 44 of the FTAA.

Overall, CRC considers that the application meets the requirements of sections 42–43 of the Act. However, CRC considers that further discussion is required with the Applicant to work through the matters identified by CRC technical advisors. Please see Attachment 3 for further details on this matter. Specifically:

- a. Detailed assessment of permitted activity thresholds and either demonstrating compliance with conditions or seeking the appropriate consent(s).
- b. CRC would encourage the use of condition sets² which have been agreed with Applicants for The Point Solar Farm and Haldon Solar Farm³ to also be applied to this proposal (adjusted accordingly for this proposal). All three proposals are located in close proximity and seek consent for the same or similar activities.
- c. Regarding potential ecological impacts, CRC considers that further expert discussion is required to narrow areas of disagreement over potential adverse effects, specifically ecology⁴ and ecological compensation. It is CRCs view that compensation should be worked through with Department of Conservation and clearly specified within the MDC set of conditions rather than deferring to adaptive management measures.

Section 42 – Authorised person may lodge substantive application for approvals

CRC considers that the Applicant has identified and applied for all relevant RMA consents under CRC's plans, as outlined above.

Section 43 – Requirements for substantive application

CRC considers that the information provided in the application and associated appendices meets the requirements for an application.

General comments from CRC to assist with consideration against s46 FTAA.

Consultation

CRC considers Nova has undertaken adequate consultation. CRC considers that the consultation detailed between CRC and Nova in Attachment 3.14 - Consultation Register is accurate and is in-line with the consultation requirements of the FTAA. CRC would like to acknowledge that Nova has been very willing to engage ahead of lodgement of the application, including through multiple rounds of review of the draft application and associated documents. This engagement is reflected in a comprehensive and considered substantive application.

CRC looks forward to continuing to engage collaboratively with Nova throughout the Fast-track process, with the aim of supporting efficient and well-informed decision-making.

² being the set of conditions for activities which would require consent from CRC

³both being currently considered against FTAA

⁴(which has been delegated to CRC due to capacity and resourcing constraints on MDC behalf)

ATTACHMENT 2: CHECKLIST A – RESOURCE CONSENT, CHANGE TO OR CANCELLATION OF A RESOURCE CONSENT

CRC notes that the substantive application and associated documents do not include a completed 'Checklist A' from the Fast-track website, however as detailed below the requirements have been provided within the application.

Clause, Schedule 5	Information required for an approval described in section 42(4)(a) (resource consent) and/or section 42(4)(b) (change or cancellation of resource consent), Clauses 5-8 of Schedule 5	CRC comments on whether this has been provided
5(1)(a)	A description of the proposed activity.	This has been provided under section 1.1-1.3 and 4.0-4.9 of the SA. This application consists of three key activities in order to construct and operate the proposed solar farm: • To use land for earthworks; • To discharge construction phase stormwater to land; and • To discharge operational phase stormwater to land.
5(1)(b)	A description and map of the site at which the activity is to occur, including whether the site is within or adjacent to— - a statutory area (as defined in the relevant Treaty settlement Act); or - ngā rohe moana o ngā hapū o Ngāti Porou (as defined in section 11 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019); or a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011.	Provided primarily in Sections 3.6.3-3.6.4 of the SA. With additional information throughout the SA. • CRC agrees with the Applicant that the application is not within a statutory acknowledgement area. However, Lake Benmore which is located approximately 2.5 km from the southern end of the site is a statutory acknowledgement area. • The application does not relate to Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019. • This application is 83km away from the coast, as such it does not relate to Marine and Coastal Area (Takutai Moana) Act 2011.
5(1)(c)	Confirmation that the consent application complies with section 46(2)(a), (b), and (d); being: • section 42; and • sections 43 and 44; and • relates solely to a listed project or a referred project; and • any fee, charge, or levy payable under regulations in respect of the application is paid. <i>Guidance note: Section 46 provides for the EPA to decide whether the substantive application is complete and</i>	Provided throughout the SA and associated documents. CRC agrees with the Applicant that the SA complies with section 42 of the FTAA: • The application has been lodged by the authorised person/entity proposed to hold the approvals sought. • The Applicant is eligible to apply for all corresponding approvals under the specified acts.

	<i>within scope. The EPA will need to be satisfied that the application complies with these requirements. These matters are addressed throughout the substantive application form and relevant checklist.</i>	- The SA seeks resource consent that would otherwise be applied for under the Resource Management Act 1991, and a wildlife approval as defined in clause 1 of Schedule 7 of the FTAA. CRC agrees with the Applicant that the SA complies with section 43 of the FTAA: - The SA is lodged in the form and manner approved by the EPA. - The SA explains how the project is consistent with the purpose of the FTAA. - The project does not involve any ineligible activities. - The approval to be held by each person. - The SA is lodged within the deadline stated in the referral decision (2 years from 1 August 2025). The Application was lodged on the 5/06/2026). - Complies with information requirements specified by the Minister under section 27(3)(b)(ii) – A summary of consultation with Te Runanga o Ngai Tahu, relevant Papatipu Rūnanga and their representatives since referral. - It is clearly stated that the project is not a priority project under s43 of the FTAA. - The requirements set out in clause 5 to 9 of Schedule 5 are included in this SA. - The requirements set out in clause 2 of Schedule 7 are included in this SA. CRC agrees with the Applicant that the SA complies with section 42 of the FTAA: - The SA relates solely to a referred project, and the SA does not involve any ineligible activities as defined in the FTAA.
5(1)(d) and 5(6)	The full name and address of— iii. each owner of the site and of land adjacent to the site; and iv. each occupier of the site and of land adjacent to the site whom the Applicant is unable to identify after reasonable inquiry; If the Applicant is not able to supply the name and address of the owner and	Provided in Attachment 1.2 - Adjacent Landowners and Properties Plans.

	each occupier of the site and of land adjacent to the site because the land is Māori land in multiple ownership, the Applicant must include a statement to that effect (clause 5(6)).	
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates.	Provided throughout the SA. At stated above for 5(1)(a) CRC agrees with the Applicant that there are no other activities beyond those set out below that are part of the proposal to which the consent application relates.
5(1)(f)	A description of any other resource consents, notices of requirement for designations, or alterations to designations required for the project to which the consent application relates.	Provided in the executive summary of the SA. At stated above for 5(1)(a) and 5(1)(e) CRC agrees with the Applicant that there are no other resource consents, notices of requirement for designations or alterations to designations required for the project to which this application relates.
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991.	This is provided in section 7-7.2 of the SA. The Applicant has provided assessment of these sections of the RMA.
5(1)(h) (and also clause s 5(2) and 5(3))	An assessment of the activity against any relevant provisions in any of the following documents: • a national environmental standard: • other regulations made under the Resource Management Act 1991: • a national policy statement: • a New Zealand coastal policy statement: • a regional policy statement or proposed regional policy statement: • a plan or proposed plan: • a planning document recognised by a relevant iwi authority and lodged with a local authority. This assessment must include an assessment of the activity against the requirements set out in clause 5(3) of Schedule 5 being: • any relevant objectives, policies or rules in the documents listed; and • any requirement, condition, or permission in any rules in any of those documents; and any other requirements in any of those documents.	Provided throughout section 8 of the SA. Also, in Attachment 3.6 and 3.7. CRC understand that the SA assess the following legislation: • Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011; • Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (NES-Freshwater) • National Policy Statement for Freshwater Management 2020 (NPSFM); • National Policy Statement for Renewable Energy Generation 2011 (NPSREG); • National Policy Statement for Natural Hazards 2025 (NPSNH); • National Policy Statement for Electricity Networks 2008 (NPSEN); • Canterbury Regional Policy Statement 2013 (CRPS); • Canterbury Land and Water Regional Plan (CLWRP); • Waitaki Catchment Water Allocation Regional Plan (WCP); • Mackenzie District Plan (MDP);

		• Iwi Management Plan of Kati Huirapa 1992; • Waitaki Iwi Management Plan 2019; and • Canterbury (Waitaha) Conservation Management Strategy 2016. CRC agrees with the Applicant that the SA and associated appendices (particularly Attachment 3.6 and 3.7) assess relevant rules, policies and objectives from the relevant legislation above.
5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including— v. identification of the relevant provisions in those Treaty settlements; and a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area.	Provided in section 3.6.3 of the SA. CRC agrees with the Applicant that the relevant Treaty settlement is the Ngāi Tahu Claims Settlement Act 1998. CRC also agrees that there are no sites located in proximity to the application site.
5(1)(j)	A list of any relevant customary marine title groups, protected customary rights groups, ngā hapū o Ngāti Porou (where an application is within, adjacent to or directly affecting ngā rohe moana o ngā hapū o Ngāti Porou), or Applicants under the Marine and Coastal Area (Takutai Moana) Act 2011.	Not relevant to this application as proposed site is approximately 83km away from the coastline.
5(1)(k)	The conditions that the Applicant proposes for the resource consent.	Provided in: • Attachment 3.2 - Proposed Conditions of Consent (Resource Consents for both CRC and MDC consents); and • Attachment 3.3 - Proposed Conditions (Wildlife Act Approvals from DOC)
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— vi. a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and if a notice has been received under section 30(5), any more up-to-date information that the Applicant is aware of about the existing resource consent referred to in the notice.	Provided in Attachment 3.16. CRC response is provided below in Attachment 4 to this letter. CRC received a section 30 request under the FTAA by NOVA on the 5 March 2026. CRC provided a section 30 response on the 10 March 2026. Mackenzie District Council (MDC) received a section 30 request under the FTAA by Meridian on the 11 March 2026. MDC provided a section 30 response on the 16 March 2026. This demonstrates that

		timeframes under s30(6)(b) of the FTAA were met.
5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6. <i>Guidance note: See rows below for requirements in clause 6.</i>	Primarily provided in section 5.0-5.19 of the SA with further ecological effects provided in Attachment 2.14.
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7. <i>Guidance note: See rows below for requirements in clause 7.</i>	Provided in section 3-3.11 of the SA. As stated above for 5(4)(a) is also relevant here. Further, CRC agree with the Applicant that the SA provides assessment and considers effects on people in the neighbourhood and the wider community (social, economic, recreational and cultural effects). The SA also considers effects on landscape (visual effects - particularly in Attachment 2.8 - Landscape Assessment). We conclude that the SA appropriately assesses the requirements in clause 7 of Schedule 5 of the FTAA.
6	(1) The assessment of an activity's effects on the environment must include the following information: (a) an assessment of the actual or potential effects on the environment: (b) if the activity includes the use of hazardous installations, an assessment of any risks to the environment that are likely to arise from such use: (c) if the activity includes the discharge of any contaminant, a description of— (i) the nature of the discharge and the sensitivity of the receiving environment to adverse effects; and (ii) any possible alternative methods of discharge, including discharge into any other receiving environment: (d) a description of the mitigation measures (including safeguards and contingency plans where relevant) to be undertaken to help prevent or reduce the actual or potential effect of the activity: (e) identification of persons who may be affected by the activity and any response to the views of any persons consulted, including the views of iwi or hapū that have been consulted in relation to the proposal:	As stated above for 5(4)(a) applies here. CRC agrees that an assessment of the actual or potential effects on the environment has been provided, see sections 5.0-5.19 of the SA. The activity includes s15 discharge consents. An assessment against adverse effects is included in section 5.0-5.19 of the SA. CRC agree that the Applicant has considered possible alternative methods of discharge including discharge into any other receiving environment within section 5.3.6 of the SA. This is outlined within the proffered consent conditions in Attachment 3.2. The substantive application is accompanied by Erosion and Sediment Control Plan, Stormwater Management Plan, Archaeological Management Plan, Biosecurity and Vegetation Management Plan, Pest Mammal Management Plan, Terrestrial Invertebrate Management Plan, and Lizard Management Plan. Full list of landowners is found in Appendix I and a summary of consultation is found within Attachment 3.14 and 3.15 including Iwi response in Attachment 2.1 and 3.2A.

	(f) if iwi or hapū elect not to respond when consulted on the proposal, any reasons that they have specified for that decision: (g) if the scale and significance of the activity's effects are such that monitoring is required, a description of how the effects will be monitored and by whom, if the activity is approved: (h) an assessment of any effects of the activity on the exercise of a protected customary right. <i>Guidance note: Clause 6(2) provides that a consent application need not include any additional information specified in a relevant policy statement or plan that would be required in an assessment of environmental effects under clause 6(2) or 7(2) of Schedule 4 of the Resource Management Act.</i>	
7	The assessment of an activity's effects on the environment must cover the following matters: (a) any effect on the people in the neighbourhood and, if relevant, the wider community, including any social, economic, or cultural effects: (b) any physical effect on the locality, including landscape and visual effects: (c) any effect on ecosystems, including effects on plants or animals and physical disturbance of habitats in the vicinity: (d) any effect on natural and physical resources that have aesthetic, recreational, scientific, historical, spiritual, or cultural value, or other special value, for present or future generations: (e) any discharge of contaminants into the environment and options for the treatment and disposal of contaminants: (f) any unreasonable emission of noise: (g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.	As stated above for 5(4)(b) also applies here.
5(5)(a)	If a permitted activity is part of the proposal to which the consent application relates, a description that demonstrates that the activity complies	Provided in Attachment 3.6. As noted in body of letter, CRC consider a clearer breakdown of the conditions of all

	with the requirements, conditions, and permissions for the permitted activity (so that a resource consent is not required for that activity under section 87A(1) of the Resource Management Act 1991).	the permitted activity rules assessed should be provided.
5(5)(b)	If the activity is to occur in an area that is within the scope of a planning document prepared by a customary marine title group under section 85 of the Marine and Coastal Area (Takutai Moana) Act 2011 or the environmental covenant prepared by ngā hapū o Ngāti Porou under section 19 of the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019, an assessment of the activity against any resource management matters set out in that document.	Not relevant to this application as proposal does not occur within these areas. However, noting that assessment provided against relevant iwi management plan in sections 8.12-8.14 of the SA.
5(5)(c)	If the activity is to occur in an area that is taiāpure-local fishery, a mātaihai reserve, or an area that is subject to bylaws made under Part 9 of the Fisheries Act 1996, an assessment of the effects of the activity on the use or management of the area.	Not relevant to this application as proposal does not occur within these areas. This application does not relate to matters under the Fisheries Act 1996.

ATTACHMENT 3: CRC TECHNICAL ADVICE SUMMARY

Technical Team	Technical expert considers all expected technical reports are provided	Technical expert has identified gaps in the provided technical reports [Consent Planner clarifying comments]	Technical expert considers the conditions are appropriate	Planner Comments
Contaminated Land	Yes. Technical expert reviewed the 'Preliminary Site Investigation' and is satisfied that the relevant contaminated land matters raised at pre-application have been addressed.	None identified.	Yes.	<i>The soil monitoring plan conditions and the no Per- and Polyfluoroalkyl substances (PFAS) condition will provide for the concern of scientists.</i> The contaminated land matters raised in the preapplication advice stage (22/4/2026) on the draft application have been addressed in the draft consent conditions.
Surface water Resources	Yes.	Technical Expert has identified further information would be beneficial specifically identification of additional small streams, or channels of the Twizel River which have effectively been incorporated into previous development of existing farming operations. These would likely become preferential flow paths, particularly after heavy rain.	Yes. Mostly agree however further development of setback condition around wetlands could be supported by riparian planting.	Conditions could be further refined or linked to a management plan to include riparian planting and ecological enhancement work around waterbodies/wetlands that have a setback.
Groundwater Resources	Yes.	Technical Expert recommends that a draft decommissioning/remediation	Yes, mostly agree however consider that the PFAS condition could be expanded to include that "outer glass	Recommend amending Condition 6 of the operational phase stormwater discharge

		plan be provided prior to consent granting, rather than only at decommissioning	encapsulation layer must be free of fluorinated compounds with external components must be assessed regularly and replaced if it is damaged."	to land consent to address the matters raised in the science comments.
Land Resources	Yes.	The Technical Expert recommends that a draft decommissioning plan be provided to the Expert Panel for consideration, to ensure that expectations for site remediation are clearly understood and addressed if the approvals are granted. Similar to the Soil Monitoring Plan or draft Erosion Sediment Control Plan. Regarding excavations on site, the topsoil (A-horizon) should be separated from B and/or C horizons. These separated horizons should be stockpiled/stored separately and where required, returned in the reverse order.	Recommend the following amendments: Clearly define surface water ponding within the conditions. Amend revegetation requirement after construction from 2 to 1 week under high erosion risk periods.	Recommend amending the conditions to provide for Technical Expert comments. Recommend that the Applicant provide a draft decommission/remediation plan for the site to be approved by the Expert Panel.
Natural Hazards	Yes.	None identified.	Yes, no issues with conditions.	The Technical Expert notes that the solutions proposed mitigate their previous concerns.

Indigenous Biodiversity See Attachment 5 for full advice.	Partly. The application now includes a more complete suite of ecological management plans and proposed conditions, and some previously raised matters have been partly addressed.	The proposal still relies heavily on uncertain or unproven management responses to address residual effects on avifauna and terrestrial invertebrates. In particular, the proposal does not address the loss of habitat extent that will result from this development. Uncertainty remains regarding bird strike risk, the adequacy and timing of compensation, the efficacy of invertebrate salvage/translocation and habitat enhancement, the long-term protection of 'enhancement areas', the feasibility of pest mammal control, cumulative effects, and the assessment of effects on the outwash plain ecosystems. Potential data deficiencies exist for indigenous vegetation values at the site. A spring survey inform the site's indigenous vegetation values & thereby inform effects management. This survey would also confirm if <i>Lepidium solandri</i> occurs at the site.	The SA considers residual effects on invertebrates will remain. For this, CRC recommend upfront offsetting or compensatory provisions are provided. Apply consistent terminology and structure across management plans. Clear objectives and ecological outcomes; - measurable performance standards; - monitoring methods linked to those standards; - trigger levels or thresholds; - adaptive management responses; - roles & responsibilities; - timeframes; - reporting requirements - audit criteria; and - compensation requirements, where relevant (avifauna, lizards & invertebrates). Edit management plans to adopt "must/will" language rather than "should" directives. This will improve the clarity and enforceability. in addition, ensure condition sets reflect essential details of the management plans.	As raised in the body of the letter above. CRC is of the view that the conditions relating to compensation, should be defined in consultation with DOC and provided upfront within the conditions of the proposal. Recommend amending the proposed MDC conditions to align with science recommendations

		Neither the AMP nor the AEE determines the quantum of compensation for kakī deaths in a concrete way.	Condition 8 – amend the management plan submission timeframes so that the relevant management plans are submitted earlier, and before any pre-construction activities covered by those draft management plans are undertaken. Amend botanical management plan to include provision for botanical survey in line with conditions 12 and 13. Clarify salvage areas in condition 16 as currently unclear. Include provision for DOC and/or qualified and experienced ecologist in condition 23. Amend Condition 41 for the Lizard Management Plan to refer to lizard rather than avifauna objectives. Require the LMP to provide for compensation within its adaptive management approach and to be of appropriate quantum (Condition 43). Edit Condition 46(e)(i) to align with Avifauna Management Plan – minimum duration for 36 months from post-construction. Edit Condition 51 to include <i>Threatened, At Risk and protected ground-nesting avifauna</i>.	
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			Edit timeframes to be more realistic within condition 71 to allow time for condition 74 provisions. Amend conditions 79 and 80 to Edit to require audits to assess whether each management plan's performance standards, adaptive management triggers and reporting requirements have been met.	
Invertebrate Ecology	Partly. Technical Expert has reviewed the invertebrate-related reports and management plans but considers additional survey/assessment would be beneficial.	Somewhat disagree with the conclusion overall that effects on invertebrates from habitat removal via earthworks are expected to be minor. (This) seems to be inconsistent with that assessment that notes the environment supports notable invertebrates. Further noting that (5.1.2) earthworks will cause "removal and destruction of notable invertebrates". Figure 1 from the Draft terrestrial invertebrate management plan states that it shows the location of the solar panels and rows however it does not. The pest management plan should be expanded upon to consider predator-proof fencing of protected areas not just hedgehog control. This is	Technical Expert considers that predator-proof fencing for the proposed protected areas should be considered, over the long-term with a covenant or similar agreement put in place so that they are protected in perpetuity irrespective of future changes in ownership or management of the site.	There is uncertainty and potential disagreement over the level of effects on invertebrates. Recommend that the Applicant consider how to address the technical auditors concerns. Additional mitigation could reasonably be proposed to limit the scale of effects. For example, CRC recommend amending the pest management plan to provide for more comprehensive predator proofing and predator control.

		in addition to removing predators from these sites. The applicant has provided little comment on effects on invertebrate biodiversity in general at the site but rather has focussed only on “notable species”. Consider more information should be provided in this area.		
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ATTACHMENT 4: CRC SECTION 30 LETTER

This information is attached separately.

ATTACHMENT 5: INDIGENOUS BIODIVERSITY TECHNICAL ADVICE

This information is attached separately.