

Memorandum on Completeness and Scope

File	FTAA-2604-1217
Application	Twizel Solar Project
To	Team Leader LOA
From	 Application Lead
Date	30 June 2026
Subject	Assessment whether the application complies with section 46(2) of the Fast-track Approvals Act 2024

Purpose

1. The purpose of this memo is to assist you in making your decision on whether the Twizel Solar Project application, lodged by Nova Energy Limited (**the Applicant**), received by the Fast-track Team on 9 June 2026 complies with the requirements of section 46(2) of the Fast-track Approvals Act 2024 (**the Act**).

Decision-maker

2. You have delegated authority to make the decision under section 46 of the Act under the instrument of delegation dated 31 March 2026.

Conflict of interest

3. I confirm that I do not have any conflict of interest in this matter that would prevent me making this assessment.

The application

4. For projects listed in Schedule 2 of the Act and referred projects, authorised persons may lodge a substantive application for approvals available under the Act.
5. The application was referred by the Minister for inclusion in the Fast-track consenting process under section 28 of the Act. The Minister accepted the referral application on 1 August 2025 and notified the EPA of the decision on the referral application on 1 August 2025.

6. The application was lodged on 9 June 2026. The EPA must, in consultation with the relevant administering agencies and relevant consent authorities, decide whether this substantive application complies with section 46 of the Act within 15 working days of the lodgement of the application (but may be longer where the EPA has requested further information from the applicant under section 46(2B)). This application was not subject to a further information request therefore the date by which the EPA must make a decision under 46 is **30 June 2026**.
7. As set out in more detail below, the EPA must decide whether the application is complete and either:
 - Notify the Panel Convener they can set up an expert consenting panel to make a decision on the application (if complete and within scope); or
 - return it to the person who lodged it (if incomplete and/or not within scope).

Project and Scope

8. The referred project is

The project is described as the establishment and operation of a 300-megawatt solar farm over 565 hectares of an 868-hectare site to the east of Twizel Township, Mackenzie District, within the Canterbury region. Once operational and connected to the National Grid, the project will generate enough renewable energy annually to power 75,000 homes. The project comprises:

- a. general earthworks and site establishment including the construction of operational and management buildings, inverters, internal roads/tracks*
- b. solar panels situated on solar tables with a single axis tracking system covering 565 hectares of site*
- c. 33kv overhead transmission lines to connect the project to the Transpower New Zealand Twizel Substation*
- d. establishment of exclusion areas and buffers to protect significant native vegetation, habitat and wetlands.*

The project will require the proposed approvals:

- a. Resource consents under the Resource Management Act 1991.*
- b. Permits under the Wildlife Act 1953.*

9. The application is described on page 11 of the substantive application as:
 - *the construction, commissioning and operation of the solar plant, associated infrastructure and connection to the National Grid.*
 - *The Project will generate up to 300 megawatts (MW) of renewable electricity, connected to the 220 kilovolt (kV) National Grid via power transformers and associated equipment located at the Transpower Twizel Substation.*

- *The 300 MW development is proposed in one stage. The proposal is described in detail in section 4 of this report. It is expected that the Project will be constructed and commissioned over an approximate three-year period.*

10. Approvals are required for the following activities as described in the executive summary of the substantive application (page i):

The application seeks resource consents under the Mackenzie District Plan and the Canterbury Regional Plan to undertake the following activities:

- a. Land use consents for the project construction, operation and maintenance of the solar farm activity;*
- b. Stormwater discharge consents (construction and operation); and*
- c. Land use consent for undertaking earthworks over an aquifer.*

The application also seeks Wildlife Act Approvals to hold, catch, handle or release lizards and to handle and hold Threatened and At Risk avifauna as part of the development of the Project.

11. The application **does** relate solely to the referred project as what is proposed in the application is in line with the description of the project as referred.

Fast-track consenting application process

Legislative context

12. The EPA must decide, in consultation with relevant administering agencies and consent authorities, whether the substantive application complies with section 46(2) of the Act. A substantive application complies with section 46(2) of the Act, if the application:
 - complies with sections 42, 43 and 44;
 - relates solely to a listed project or a referred project;
 - the EPA considers that, on the face of the application, the project does not appear to involve an ineligible activity; and
 - any fee, charge, or levy payable under the Fast-track Approvals (Cost Recovery) Regulations 2025 (the Regulations) in respect of the application is paid.
13. The EPA may request further information from the applicant under section 46(2A) for the purposes of determining whether the application is complete and within scope.

Section 42 Requirements

14. Section 42 of the Act states that an authorised person may lodge a substantive application for the project, 1 substantive applications for each stage of a project if the Minister has determined that the project may proceed in stages (either under s 21(1)(a) or s 37A). Section 42(4) lists the approvals that may be sought under the Act.
15. This application has been lodged by Nova Energy Limited. This person is an authorised person under the Act because they are the same specified person listed in the Minister referral decision under section 27(2).
16. The approvals being sought are:
 - an approval described in section 42(4)(a) (resource consent): **checklist A**;
 - an approval described in section 42(4)(h) (wildlife approval), **checklist E**;
17. All of the above listed approvals are of the type set out in section 42(4) of the Act.
18. For each of the approvals sought, the applicant is eligible to apply for any corresponding approval under a specified Act.

Section 43 Requirements

19. Section 43 of the Act sets out the requirements for a substantive application. The substantive application was lodged in the form and manner approved by the EPA. Assessment of section 43 requirements is included at Appendix 1.

Section 44 Requirements

20. Section 44 of the Act requires that the information provided by the applicant under section 43 must be specified in sufficient detail to satisfy the purpose for which it is required. Assessment of section 44 sufficiency is included at Appendix 1.
21. In assessing the sufficiency of information provided by the applicant, we rely on the information provided to us through consultation with each relevant administering agency and consent authority, as summarised in Appendix 2.
22. As set out in more detail in Appendix 2, the agencies consulted have advised that the information required by section 44 is provided in **sufficient** detail to satisfy the purpose for which it is required.

Ineligibility

23. The EPA needs to decide whether it considers that, on the face of the application, the project does not appear to involve an ineligible activity, as defined in section 5 of the Act. As the EPA has to consider this on the face of the application, the EPA is only able to consider information contained in the application materials.

24. The list of ineligible projects includes activities:

- on land returned under a Treaty settlement, on identified Māori Land, on Māori customary land, on land set apart as Māori reservation, or in a customary marine title or protected customary rights area without written permission from the rights holder;
- on Māori customary land, or land set apart as Māori reservation under Part 17 of Te Ture Whenua Māori Act 1993;
- in a customary marine or protected customary rights area without written agreement from the rights holder/group;
- within an aquaculture settlement area without the required authorisation;
- activities that would be prevented under section 165J, 165M, 165Q, 165ZC, or 165ZDB of the RMA (which deal with occupation of space in the common marine and coastal area); or
- that require permissions on national reserves (or reserves vest in another person) held under the Reserves Act 1977 ; or
- on land listed under clauses 1 to 11 or 14 of Schedule 4 of the Crown Minerals Act 1991 (and clauses 12 and 13 for mining activities).
- That are prohibited under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012, or section 15B or 15C the Resource Management Act 1991.
- That relate to decommissioning under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012
- That are undertaken for the purposes of an offshore renewable energy project.

25. I consider that, on the face of the application, the project does not appear to involve an ineligible activity.

Fees and levies

26. The EPA has received all fees, charges and levies payable by the applicant under the Regulations for the substantive application as follows:

- Application fee in the sum of \$250,000 plus GST;
- Levy in the sum of \$140,000 plus GST.

Consultation

27. I have consulted with and considered consultation responses from the following relevant administering agencies and relevant consent authorities:

- Canterbury Regional Council and Mackenzie District Council for:
 - i. an approval described in section 42(4)(a) (resource consent)
- The Department of Conservation for:

- i. an approval described in section 42(4)(h) (Wildlife Act wildlife approval)
28. A summary of the consultation is included as Appendix 2.

Assessment of compliance for each section of each application form

29. I have assessed the application materials against the relevant checklists in the prescribed application form. Each assessment is contained within the appropriate approval checklist. These are included in Appendix 1 for ease of reference.
30. My view is that the application does comply with section 46 and the EPA may now notify the applicant of its decision.
31. The EPA must now decide whether the substantive application has a competing application (under section 47A(1)) and, if applicable, if there are any existing resource consents not identified in the substantive application (under section 47A(4), under delegation from the Minister for Infrastructure under section 47C, within 10 working days from the date of the completeness decision (under section 47(2)).
32. Once the EPA has made the decision under section 47A(1), the EPA must notify the panel convener that a panel can be set up to commence consideration and decision of the application.

Appendix 1: Assessment of section 44 sufficiency

My assessment of the application materials is set out in the relevant checklists below:

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

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	Application Reference	EPA
5(1)(a)	A description of the proposed activity	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 4 at page 57	Yes, as described. Also described at section 1.1 (page 11) of the Application.
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— (i) a statutory area (as defined in the relevant Treaty settlement Act); or (ii) 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 (iii) a protected customary rights area under the Marine and Coastal Area (Takutai Moana) Act 2011	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 3.1-3.6 (at page 27 - 52 respectively)	Information is partially provided as described. (i) Answered on pg 51 of the Application. (ii) and (iii) are not explicitly answered in the application. (iii) is answered in the Memorandum of Counsel at pg 28 (para 83).

			CRC have confirmed that the application does not relate to Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019. This section is therefore answered in enough detail to be sufficient.
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.	The application complies with section 46(2)(a), (b), and (d) of the Fast-track Approvals Act 2024 in that: the application has been prepared and lodged by an authorised person in accordance with section 42, and seeks approvals	Yes, as described.

		available under the Act for a listed project; the application includes the information required by sections 43 and 44, including the prescribed form, supporting technical assessments, and consultation outcomes; the application relates solely to the listed project (Nova Energy Twizel Solar Project) and remains within the scope of that	
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		project as referred; and all applicable fees, charges, and levies payable in respect of the application have been paid. Accordingly, the application provides the necessary information to enable the Environmental Protection Authority to determine that it is complete and	
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		within scope under section 46.	
5(1)(d) and 5(6)	The full name and address of— (i) each owner of the site and of land adjacent to the site; and (ii) each occupier of the site and of land adjacent to the site whom the applicant is able to identify after reasonable inquiry; If the applicant is not able to supply the name and address of the owner and 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)).	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 6.1 at page 139 and Figure 6.1	Yes, described within section 6.1 (pages 136-137) and map at page 137 of the application and Attachment 1.2.
5(1)(e)	A description of any other activities that are part of the proposal to which the consent application relates	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 1.5.3 at page 19 and Section 1.5.4 at page 20	Yes, as described. These sections include a description of the wildlife approval sought, the other approvals outside of FTAA sought (works within the substation and other related activities). CRC agrees with the applicant that: <i>“there are no other activities beyond those set out below that are part of the proposal to which the consent application relates.”</i>

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	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 1.5.3 at page 19 and Section 1.5.5 at page 20	Yes, applicant has described this more succinctly in the Executive summary of the application (page i).
5(1)(g)	An assessment of the activity against sections 5, 6 and 7 of the Resource Management Act 1991	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 7 at page 141	Yes, as described.
5(1)(h) (and also clauses 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:	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 8 at page 145 and	Yes, as described. There is an overview of documents on page 145, and an assessment follows on pages 146-154 and Attachments 3.6 and 3.7. Mackenzie District Council notes:

	• 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.	Attachment 3.7 - Statutory Planning Assessment	<i>“Based on the information provided in the Substantive Application (and its appendices), the Mackenzie District Council considers that the Operative Mackenzie District Plan (as recently amended by Plan Changes 18 and 23 to 30) would apply.</i> <i>The Council considers that, based on the current understanding of the project proposal, the relevant planning documents identified by the Applicant in the Assessment of Environmental Effects (AEE) are correct. However, the Applicant does not appear to have provided an assessment of the relevant provisions included in Plan Change 18 (PC18) relating to Ecosystems and Indigenous Biodiversity.”</i> The applicant has identified and undertaken an assessment of the Mackenzie District Plan (pages 1-13 of Attachment 3.7). This includes specific
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			reference to the Ecosystems and Indigenous Biodiversity provisions, which the applicant considers are not relevant to the project. On balance, I am satisfied that the applicant has considered the relevant plan provisions, and that this issue may reflect a difference in technical opinion between the Council and the applicant, rather than a deficiency in the level of information provided. Therefore, I do not consider that this matter makes the application insufficient for the purposes of section 44. It may, however, be appropriate for further consideration by the Expert Panel once appointed.
5(1)(i)	Information about any Treaty settlements that apply in the area covered by the consent application, including— (i) identification of the relevant provisions in those Treaty settlements; and	Nova Energy Twizel Solar Project - FTAA Substantive Application,	Yes, as described.

	(ii) a summary of any redress provided by those settlements that affects natural and physical resources relevant to the project or project area	Section 3.6.3 at page 49	
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;	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 3.6.3 at page 49	N/A – project site is not near coastline.
5(1)(k)	Any conditions that the applicant proposes for the resource consent.	Attachment 3.2 - Proposed Conditions of Consent (Resource Consent)	Yes, as described.
5(1)(l)	if a notice under section 30(3)(b) or (5) has been received,— (i) a copy of that notice showing that it was received within the time frame specified in section 30(6)(b); and (ii) if a notice has been received under section 30(5), any more up-to-date information that the applicant is aware	Attachment 3.16 - Notices Received from MDC and ECAN	Yes, as described.

	of about the existing resource consent referred to in the notice.		
5(4)(a)	An assessment of the activity's effects on the environment that includes the information required by clause 6.	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 5 at page 92	Yes, information located in the entirety of section 5 of the application (page 89-130).
5(4)(b)	An assessment of the activity's effects on the environment that covers the matters specified in clause 7.	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 5 at page 89	Yes, as above.
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:	Nova Energy Twizel Solar Project - FTAA Substantive Application,	Yes, as above.

	(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: (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	Section 5 at page 89	
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	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.		
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:	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 5 at page 89	Yes, as above. Mackenzie District Council notes: <i>"That cumulative effects on the Te Manahuna/Mackenzie Basin Outstanding Natural Landscape (ONL) require further assessment given this is the third Fast Track project located in this southern part of the identified ONL.</i> <i>From the information provided to date the Mackenzie District Council has not seen any assessment related to the potential social impacts on the townships (namely Twizel) within the Mackenzie District resulting from the potential lack of adequate workers accommodation; and any subsequent distributional and social changes arising from staffing</i>

	(g) any risk to the neighbourhood, the wider community, or the environment through natural hazards or hazardous installations.		<i>requirements for existing businesses and the disruption to the residential rental market caused by the increased demand for staff and housing over the construction period.”</i> I believe the cumulative effects are not directly relevant to the completeness decision of the application and will likely be a matter for the Expert Panel once appointed. In relation to MDC’s comments on 7(a) of this clause, the applicant has assessed social and cultural effects both within its substantive application document at section 5 and within its Attachments (particularly Attachment 2.8). The matters MDC have raised are likely more relevant to be addressed at the Panel stage and I do not believe they would make the application fail sufficiency of this section.
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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 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)	Attachment 3.6 - Statutory Planning Rules Assessment	Yes, as described. CRC notes: “CRC consider a clearer breakdown of the conditions of all the permitted activity rules assessed should be provided.” I believe the applicants assessment, especially pages 16-21 of Attachment 3.6 is in sufficient detail to satisfy s 46 of the FTAA.
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 Applicable	N/A
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 Applicable	N/A

CHECKLIST E – Wildlife approval

Clause, Schedule 7	Information required for an approval described in section 42(4)(h) (Wildlife Act approval), clause 2 of Schedule 7	Application Reference	EPA
2(1)(a)	Specify the purpose of the proposed activity	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 1.5.3 at page 19	Yes, as described. Also present at Section 9.1 (page 155).
2(1)(b)	Identify the actions the applicant wishes to carry out involving protected wildlife and where they will be carried out (whether on or off public conservation land)	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 1.5.3 at page 19, Attachment 2.14 - Assessment of Ecological Effects Section 13.7 page 78, Attachment 3.12 - Lizard Management Plan, Section 2.0 at page 7 and Section 3.3.1 at page 8.	Yes, as described. Proposed actions are also specified at Section 9.2 (page 155). DOC notes: <i>“The specified activities do not include handling or holding injured birds, although this is covered in the AMP. If not included in this application, separate approval under the standard Wildlife Act</i>

		Attachment 3.13 - Avifauna Management Plan, Section 6.14.3 at page 14.	<i>process would be required to cover those activities.”</i> The AMP at attachment 3.13 is part of the lodged application and does specify that approval is sought for the handling and holding injured birds, as does section 1.5.3 at page 19 of the substantive application. I believe this section is therefore sufficient.
2(1)(c)	An assessment of the activity and its impacts against the purpose of the Wildlife Act	Attachment 2.14 - Assessment of Ecological Effects, Section 2.3.3 at page 15 and Section 13.7 at page 78. Attachment 3.12 - Lizard Management Plan, Section 2.0 at page 7 and section 3.3.1 at page 8. Attachment 3.13 - Avifauna Management Plan,	Yes, as described. Also present in the substantive application at section 9.2-9.3 (page 155-156).

		Section 6.1 at page 6.	
2(1)(d)	List protected wildlife species known or predicted to be in the area and, where possible, the numbers of wildlife present and numbers likely to be impacted	Attachment 2.14 - Assessment of Ecological Effects, Section 6.0 at page 30 and Section 7 at page 32. Attachment 3.12 - Lizard Management Plan. Attachment 3.13 - Avifauna Management Plan	Yes, as described. Also present in substantive application at section 9.4 (pages 156-157). DOC notes: <i>"While avifauna species are listed, there are some inconsistencies and gaps in how they are presented. Australasian bittern and spotless crane are referred to as known in the vicinity in Section 4.0 of the AMP and Section 6.2 of the AEE, but missing from the species list in Appendix 2 of the AMP. Pied shag (At risk, recovering) is known in the vicinity but not recorded anywhere in the application documents."</i> These comments do not prevent the applicant passing the sufficiency requirements of this assessment.

2(1)(e)	An outline of impacts on threatened, data deficient, and at-risk wildlife species (as defined in the New Zealand Threat Classification System)	Attachment 2.14 - Assessment of Ecological Effects, Section 6.0 at page 30 and Section 7 at page 32. Attachment 3.12 - Lizard Management Plan. Attachment 3.13 - Avifauna Management Plan	Yes, as described. Also present in substantive application (section 9.5, page 157).
2(1)(f)	A statement of how the methods proposed to be used to conduct the actions involving protected wildlife will ensure that best practice standards are met	Attachment 2.14 - Assessment of Ecological Effects, Section 13.2 at page 66 and Section 13.3 at page 70, Attachment 3.12 - Lizard Management Plan. Attachment 3.13 - Avifauna Management Plan	Yes, as described. Also present in substantive application (section 9.6, page 158).

2(1)(g)	A description of the methods to be used to safely, efficiently, and humanely catch, hold, or kill the animals and identify relevant animal ethics processes:	Attachment 2.14 - Assessment of Ecological Effects, Section 13.2 at page 66 and Section 13.3 at page 70, Attachment 3.12 - Lizard Management Plan. Attachment 3.13 - Avifauna Management Plan	Present in application but not as described. Descriptions present in LMP (8.2 pages 26-28) and AMP (6.11, pages 11-12).
2(1)(h)	A statement of the location or locations in which the activity will be carried out, including a map (and GPS co-ordinates if available)	Attachment 2.14 - Assessment of Potential Ecological Effects, Section 3.1 at page 16 and Figures 1-6. Attachment 3.12 - Lizard Management Plan, Figures 1 and 4. Attachment 3.13 - Avifauna Management Plan, Appendix 1	Yes, as described.

2(1)(i)	A statement of whether authorisation is sought to temporarily hold or relocate wildlife	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 1.5.3 at page 19, Attachment 3.12 – Lizard Management Plan, Section 8 at page 26.	Yes, also present in substantive application at 9.2 (page 155).
2(1)(j)	A list of all actual and potential wildlife effects (adverse or positive) of the proposed activity, including effects on the target species, other indigenous species, and the ecosystems at the site	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 5.5 at page 99, Attachment 2.14 – Assessment of Potential Ecological Effects. Attachment 3.12 - Lizard Management Plan. Attachment 3.13 - Avifauna Management Plan	Yes, as described. DOC notes: <i>“Although the information for lizards is sufficient in terms of the direct effects of this proposal, it does not address the cumulative impacts of development across the range of these species.</i> <i>This point is not relevant for avifauna given that handled birds will already be dead.”</i> This comment does not directly impact the sufficiency test of this clause.

2(1)(k)	Where adverse effects are identified, state what methods will be used to avoid and minimise those effects, and any offsetting or compensation proposed to address unmitigated adverse effects (including steps taken before the project begins, such as surveying, salvaging, and relocating protected wildlife)	Nova Energy Twizel Solar Project - FTAA Substantive Application, Section 5.5 at page 99, Attachment 2.14 – Assessment of Potential Ecological Effects. Attachment 3.12 - Lizard Management Plan. Attachment 3.13 - Avifauna Management Plan	Yes, as described (especially 5.5.3 of the substantive application at page 100). DOC notes: <i>“The information provided for lizards is appropriate, but DOC considers that two additions are required:</i> <i>1. In section 9.2. add an additional objective to determine the recovery of lizards within the rodent control area.</i> <i>2. Add provision for monitoring to determine the success of rodent control in the areas of high quality rocky habitat described as “the scarp and old river terrace in the central southern part of the site” (section 7.3.6) to ensure that perverse outcomes don’t occur.”</i> I do not believe these are matters that are relevant to the sufficiency test of this clause and could be
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			matters that DOC considers in its section 51 report.
2(1)(l)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has been convicted of any offence under the Wildlife Act	Attachment 3.12 – Lizard Management Plan, Section 3.3.1 at page 8	Included in application, not as described. Present at section 9.8 of the substantive application (page 160).
2(1)(m)	A statement of whether the applicant or any company director, trustee, partner, or anyone else involved with the application has any current criminal charges under the Wildlife Act pending before a court	Attachment 3.12 – Lizard Management Plan, Section 3.3.1 at page 8	Included in application, not as described. Present at section 9.8 of the substantive application (page 160).
2(1)(n)	Provision of proof and details of all consultation, including with hapū or iwi, on the application specific to wildlife impacts	Attachment 3.14 - Consultation Register, Attachment 3.14A - Consultation Summary	Yes, as described. A summary is also present at 9.9 of the substantive application (pages 160-161). DOC notes: <i>“Although the Applicant has provided descriptions and summaries of consultation, including with hapū and iwi, no proof of this is provided. For Wildlife Act approvals DOC would normally expect copies of correspondence or a letter of acknowledgement from</i>

			<i>the consulted parties to be provided.”</i> DOC’s point is noted, however, there is substantial detail included in Attachments 3.14 and 3.14A in relation to consultation conducted and a Cultural Effects Assessment has been provided (Attachment 2.1) on behalf of Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki which could indicate proof of engagement from their perspective. Overall, I believe the applicant has completed this clause sufficiently.
2(1)(o)	Provision of any additional written expert views, advice, or opinions the applicant has obtained concerning their proposal	Attachment 3.9 - Biosecurity Management Plan, Attachment 3.10 - Pest Mammal Management Plan, Attachment 3.11 - Terrestrial	Yes, as described.

		Invertebrate Management Plan	
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Appendix 2: Consultation Summary

The following agencies were consulted with to inform the assessment of the application for completeness. Each agency was requested to confirm whether the application documentation provided by the EPA regarding the proposal as provided by the applicant meets the requirements of sections 42 and 43 of the Act and is provided in sufficient detail to satisfy the purpose of the Act in accordance with section 44 of the Act.

- 1. Consultation with Canterbury Regional Council** as the relevant consent authority for the following approvals under the Resource Management Act 1991. Resource consent (section 42(4)(a) of the Act)

Canterbury Regional Council (CRC) confirmed that the application provides enough detail to meet the requirements of sections 42-44 of the FTAA. CRC did note that there were areas of the application that they believed should be addressed by the applicant during the FTAA process. These areas were:

- 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).
- 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.
- Confirming compliance with the relevant permitted activity rules. This has been addressed in Checklist A.

Link to full CRC consultation response: [FDB002091L6F2](#)

- 2. Consultation with Mackenzie District Council** as the relevant consent authority for the following approvals under the Resource Management Act 1991: Resource consent (section 42(4)(a) of the Act).

MDC noted that there was concern that:

- the rules included in PC18 do not appear to have been considered;
- and an assessment of the cumulative impacts both in terms of landscape and visual effects and the economic and social impacts on Twizel Township do not appear to have been adequately assessed in the assessment provided to date.

Both these points have been discussed in Checklist A above.

Link to full MDC consultation response: [FTAA-2604-1217 Nova MDC Letter 220626.pdf](#)

3. Consultation with the Department of Conservation as the administering agency for the following Acts: A wildlife approval as defined in clause 1 of schedule 7 of the Act (section 42(4)(h) of the Act).

The **Department of Conservation (DOC)** confirmed that the application provides enough detail to meet the requirements of sections 42-44 of the FTAA. DOC noted there were further matters they wished to see addressed by the applicant during the FTAA process. These included:

- Details as to offsetting and / or compensation measures. The Expert Panels for the nearby Haldon and The Point Solar Farm projects have suggested that a substantial, upfront and secured funding commitment for avifauna recovery is likely to be necessary to address risks to threatened avifauna. Such compensation would be additional to a detailed adaptive management programme. DOC's understanding is that this application presents the same or greater risk to avifauna as those projects. Accordingly, it will be necessary for this applicant to give consideration to providing an upfront commitment, unless it can provide evidence to show that the risk to avifauna is significantly less at this site;
- Population Viability Analysis should be undertaken up front for threatened avifauna species (at least kakī) to assist the Panel to understand the population risk of bird collisions with the solar panels or infrastructure;
- Further work is required on (a) bird carcass monitoring design by a suitably qualified biostatistician to ensure it is statistically robust, and (b) description of effective response measures that would apply if bird collision trigger thresholds are reached;
- There are significant occurrences of threatened plants around the perimeter of the site, which will require either further survey to confirm their locations and appropriate management; or protection through increased setbacks. (We understand this was Nova's intent, but it is not confirmed by the application documents);
- To avoid edge effects on threatened plants outside the site perimeter, the applicant should undertake a cross-check of the locations of restoration and enhancement areas with threatened plant information;
- The applicant should also provide a monitoring plan for effects on vegetation, which is currently absent. This should be statistically robust, and include response measures that would apply if trigger thresholds are reached.

As these matters are not related to the sufficiency test of the application, they have not been requested of the applicant at this stage. Link to full DOC consultation response: [Department of Conservation advice for EPA compliance assessment Twizel Solar Farm.docx - APPROVED - 2026-06-15T20 12 52.6087431Z \(1\).pdf](#)