Addendum to Statement of Advice

Under:	Fast-track Approvals Act 2024
In the matter of:	FTAA-2603-1178 – Alternative to the Brynderwyn Hills Project (Brynderwyn Hills section)
Addendum to Statement of advice dated 29 July 2026 of:	Dr Jamie Stavert Terrestrial invertebrates DOC staff
Date:	20 October 2026

Introduction

1. My name is Dr Jamie Stavert. This addendum updates my terrestrial invertebrate statement of advice dated 29 July 2026 that forms Appendix B to the Department of Conservation's section 51 report. My qualifications, scope and limits of expertise remain as stated there. My core conclusions and recommendations remain unchanged.

2. I have reviewed the following documents received from NZTA over the period during which the application was suspended:

    a. A2BH – Ecological Effects Mitigation Table 28 August 2026

    b. Brynderwyns Hills Alternative Project – Indicative Compensation Approach dated 7 October 2026

    c. Terrestrial Survey Information maps dated 7 October 2026, and

    d. Proposed Amendments to Mitigation Package Since Lodgement (9 October 2026)

3. I assess these alongside the 13 July Wildlife Approval and regional resource consent conditions and draft Ecological Management Plan (EMP) reviewed in my July statement. The further material did not include consolidated conditions or an EMP incorporating those proposals.

Code of conduct

4. Although this is not an Environment Court proceeding, I confirm that I have read the Code of Conduct for expert witnesses in the Environment Court Practice Note 2023, agree to comply with it, and have complied with it in preparing this advice. Unless stated otherwise, this advice is within my area of expertise. I have not omitted to consider any material fact known to me that might alter or detract from the opinions expressed.

Forest protection compensation

5. The Indicative Compensation Approach proposes funding legal protection and initial enhancement of existing indigenous forest to avert loss elsewhere (pages 2–4). This could conserve established invertebrate habitat without the recovery period associated with new planting. My discussion in my July statement of advice of replacement planting does not directly assess this mechanism. Its contribution depends on the invertebrate values present and the additional protection or habitat improvement delivered.

6. The proposal does not identify the forests where protection funds would be spent or demonstrate gains for the affected invertebrate values. I cannot yet assess the extent to which it would address those effects. That assessment requires information on the additional gains, their timing and how necessary management would be maintained.

Terrestrial survey maps

7. NZTA's Terrestrial Survey Information maps dated 7 October 2026 improve the presentation of spatial information by showing mapped vegetation, snail records and search locations alongside indicative earthworks and spoil sites. The legend does not indicate whether mapped kauri-snail records represent live animals or empty shells. The drawings do not quantify suitable snail habitat lost, retained or disturbed by the construction stage. I retain the recommendation in paragraph 34 of my July statement of advice for that habitat assessment across all permanent and temporary works.

Comments on the Applicant's proposed amendments to conditions

8. For kauri snails, the Applicant's 28 August Ecological Effects mitigation table proposes mammalian pest control from three months before relocation until five years after transfer/relocation is completed at each Release Site. This extends the three-year endpoint assessed in my July statement of advice. Time alone does not justify stopping control. I retain the recommendations in paragraphs 39–40: the duration of pest control and any decision to stop it should depend on measurable pest, habitat and kauri snail outcomes, with monitoring and corrective action.

Conclusions / Recommendation

9. My core conclusions in paragraphs 45–47 and recommendations in paragraphs 33–44 of my July statement of advice remain unchanged. The further material does not demonstrate a Low mitigated overall level of effect for kauri snail or resolve the gaps in the assessment of affected habitat and release-site capacity, and in monitoring. No updated conditions have been provided by the Applicant, so the final wording of amended proposed conditions and plans remains to be reviewed.