



The Point Solar Farm Response: FNSF Response: Section 1.3 – Hazardous Substances

04th February 2026

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Section 1.3 – Hazardous Substances (Overview):

The proposed Point Solar Farm includes the installation and operation of oil-filled power transformers associated with the project substation and grid connection infrastructure. These transformers will contain mineral insulating oil, which is classified as a hazardous substance under the Hazardous Substances and New Organisms Act 1996 (HSNO). The purpose of this section is to confirm the applicable regulatory framework for the storage and handling of transformer oil, identify whether any approvals or consents are triggered, and outline how potential environmental effects are avoided or appropriately managed through design and operational controls.

Transformer oil will be fully enclosed within sealed transformer units and supported by engineered secondary containment systems. The project has been designed so that there is no intentional or routine discharge of transformer oil to land, groundwater, surface water, or stormwater.

Potential risks are addressed through best-practice engineering design, spill prevention measures, emergency response planning, and ongoing operational controls. Accordingly, no separate consents are sought from the Expert Panel in relation to hazardous substances.

Detailed responses addressing the specific questions raised by the Panel under Section 1.3(a)–(d) are provided below.

a) Consent requirements under the HSNO Act 1996 and the RMA 1991

Hazardous Substances and New Organisms Act 1996 (HSNO)

Transformer oil is regulated under the HSNO Act and the Health and Safety at Work (Hazardous Substances) Regulations 2017. This regulatory framework provides nationally consistent controls for the storage, use, containment, emergency management, and disposal of hazardous substances.

Compliance with HSNO requirements will be achieved through:

- Enclosed transformer design that limits exposure of oil to the environment.
- Engineered secondary containment systems.
- Spill prevention and emergency response procedures.
- Hazardous substance inventories, signage, and access to Safety Data Sheets.

HSNO does not establish a resource consenting pathway under the RMA. Compliance is achieved through adherence to national regulatory requirements rather than project-specific consents.

Resource Management Act 1991 (RMA)

Under the RMA, resource consent requirements may arise where the storage or use of hazardous substances results in an actual or potential discharge of contaminants to land, water, or air, or where permitted activity standards are exceeded.

For the Point Solar Farm:

- Transformer oil will be stored within sealed transformers located in impermeable, bunded containment areas designed to retain at least 110% of the total oil volume, including allowance for rainfall and firefighting water.
- Transformers will be sited away from watercourses and flood-prone areas.
- No intentional or routine discharge of transformer oil is proposed.
- Any accidental release would be fully contained on site and managed in accordance with an Oil Spill Management and Emergency Response Plan.

The proposal is therefore designed to avoid the discharge of contaminants. On this basis, the storage and handling of transformer oil is consistent with permitted activity provisions of the relevant regional planning framework, and no separate resource consent is triggered under the RMA in relation to hazardous substances.

The proposal complies with Canterbury Land and Water Regional Plan (CLWRP) discharge rules by avoiding any contaminant discharge to land or water, consistent with permitted activity status where no discharge occurs. Bunding and controls prevent entry to surface water/groundwater per general discharge provisions (e.g., Rules around contaminant discharges in Chapter 5, including Rule 5.99 which acts as a catch-all for unpermitted discharges, and prohibitions on hazardous substances entering water under Rules 5.7–5.8). This aligns with Canterbury Regional Council's (ECan) guidance on hazardous substances, which states that regional rules manage discharges from hazardous substance activities to avoid adverse effects (refer to ECan's hazardous substances page for further details). We have sought confirmation from ECan via recent correspondence (email chain dated 13 January 2026 and follow-up dated 4 February 2026, attached) that contained transformer oil with 110% bunding is permitted without consent, and their indications support this approach. The full operative CLWRP PDF (incorporating changes as of 2025/2026) is available from ECan at <https://www.ecan.govt.nz/your-region/plans-strategies-and-bylaws/canterbury-land-and-water-regional-plan/>.

Additionally, the storage and use of hazardous substances is addressed under CLWRP Rules 5.179–5.184. Specifically, Rule 5.181 permits the storage and use of hazardous substances (non-portable) on or over land provided all conditions are met, including: setbacks from waterbodies and bores (e.g., 20m from surface water and 10m from bores), impermeable surfaces, bunding, and monthly inspections of stored substances if the site is staffed (Condition 3). As confirmed in ECan's correspondence (4 February 2026), the proposal meets these conditions, including monthly inspections, rendering the activity permitted under Rule 5.181. No consent is required for minor contaminant discharges under Rule 5.100.

District Plan Context:

Under the provisions of the Mackenzie District Plan, Rule HAZS-R1 permits the use and storage of hazardous substances, excluding a Major Hazard Facility¹, provided hazardous substances are located outside a High Flood Hazard Area. There will be no storage of hazardous substances within a High Flood Hazard Area on the site and therefore no consent triggers under the Mackenzie District Plan apply.

b) Consents sought from this Panel

No consents are sought from this Panel in relation to the storage, use, or handling of transformer oil.

Hazardous substance management is addressed as an integral component of the overall project design and operation, rather than as a separate consenting activity.

c) Proposed conditions (if consents were sought)

As no consents are sought, no specific consent conditions are proposed.

Notwithstanding this, Far North Solar Farm Limited commits to implementing the following measures as part of the project design and Operation.

- All oil-filled transformers will be located within impermeable bunded areas sized to contain the full oil volume, with appropriate allowance for rainfall.
- All oil-filled transformers will be located within impermeable bunded areas designed to contain at least 110% of the total oil volume.
- Bunded areas will be isolated from the stormwater network or managed via controlled systems to prevent contamination.
- An Oil Spill Management and Emergency Response Plan will be prepared and implemented prior to commissioning.
- Regular inspection and maintenance of transformers and containment infrastructure will be undertaken, including monthly inspections of stored substances (mineral insulating oil) in line with CLWRP Rule 5.181 Condition 3, as the site will be staffed during operations.
- Oil handling and maintenance activities will be undertaken by suitably qualified personnel in accordance with manufacturer specifications and industry best practice.

¹ Has the same meaning as the Health and Safety at Work (Major Hazard Facilities) Regulations 2016. Means a facility that WorkSafe has designated as a lower tier major hazard facility or an upper tier major hazard facility under regulation 19 or 20.

d) Approach where no consents are sought

Where no consents are sought, the Applicant proposes to manage potential effects by:

- Designing the proposal to avoid the need for resource consents for hazardous substance storage or discharge.
- Ensuring full compliance with:
 - HSNO legislation and the Health and Safety at Work (Hazardous Substances) Regulations.
 - Relevant regional plan permitted activity standards, including CLWRP Rule 5.181.
 - Industry best practice for transformer oil containment and spill management.
- Implementing operational environmental management procedures to prevent adverse environmental effects.

This approach is consistent with established practice for large oil-filled transformers at electricity substations throughout New Zealand, including nationally significant transmission infrastructure.

Conclusion:

Based on the assessment above, it is concluded that the potential risks associated with transformer oil at the Point Solar Farm are appropriately avoided or managed through project design and compliance with applicable national regulatory controls. The quantity of transformer oil has been considered in the context of applicable regional plan provisions, and in this context, hazardous substance effects are adequately addressed within the scope of the proposal, with no additional consent required from the Expert Panel in relation to hazardous substances.