





Dust Management Plan (DRAFT)

Lake Pūkaki Dam Resilience Works

Meridian Energy Limited

13 April, 2026

→ The Power of Commitment

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GHD

Contact: Rebecca Wilson, Senior Air Quality Consultant | GHD
 27 Napier Street, GHD Centre Level 3
 Freemans Bay, Auckland 1010, New Zealand
 T +64 9 370 8000 | F +64 9 370 8001 | E aklmail@ghd.com | ghd.com

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1. Introduction

Meridian will create dust emissions as part of construction works at Lake Pūkaki. GHD was commissioned by Meridian to create a Draft Dust Management Plan (Management Plan) to support site construction works and minimise impacts to the surrounding community. This plan was developed in accordance with the Good Practice Guide for Assessing and Managing Dust (MFE, 2016), which outlines management options for dust emitting sites.

This document is a preliminary Dust Management Plan. Prior to construction commencing, a final version of this Management Plan will be developed with input from the selected Construction Contractor (Contractor) and submitted to Environment Canterbury for certification. As outlined in Section 1.4 and 6, the Management Plan will be subject to continuous improvement and updates as the project progresses. Management options include prevention, mitigation and rectification measures, all of which may become necessary during the construction of the Project. The management plan outlines strategies to minimise dust impacts at sensitive receptors, resulting from construction processes and activities.

1.1 Purpose of this plan

This purpose of this Management Plan is to:

- Comply with the *Good Practice Guide for Assessing and Managing Dust*, the *Canterbury Regional Air Plan*, and other relevant regulatory requirements
- Provide a description of the regulatory requirements relevant to dust and air quality that must be met in the course of undertaking construction works at the Project site.
- Identify the most likely sources of dust emissions that will be encountered during the construction works.
- Provide employees and contractors with clear descriptions of their responsibilities in relation to dust management during the construction works.
- Provide a description of the measures to be implemented by Meridian (and their contractors) to manage and mitigate dust impacts associated with operations.
- Provide a process for responding to feedback and complaints from affected sensitive receptors.

1.2 Assumptions

This Management Plan is subject to the following assumptions:

- Based on the proposed works, planned activities include stockpiling, creation of temporary access tracks, material handling, and hauling. Planned construction activities for the rip-rap works are described in GHD 2025B.
- Other construction activities, such as bulk earthworks, drilling, or excavation (other than dam materials) are not proposed to occur and are not considered in this Management Plan. Should these activities be required, a revision to this plan will be required.
- No baseline monitoring has been undertaken at this site to support this plan.
- An air quality assessment report, including dispersion modelling, has been considered in the development of this plan (GHD 2025A).
- This plan is to be read in conjunction with the GHD 2025A report and addresses the construction site, emissions sources, and proposed activities only.
- There may be dust impacts arising from construction activities that are not addressed in the GHD 2025A Report. Should additional activities occur, a revision to this Management Plan will be required.
- A Trigger Action Response Plan (TARP) has been developed as part of this plan. The TARP should be regularly reviewed during activities.

1.3 Compliance with relevant legislation and guidelines

Meridian is required to comply with conditions of consent in addition to relevant legislation and guidelines when undertaking construction activities at the project site. The criteria presented in Table 1.1 are those presented in New Zealand's *Ambient Air Quality Guidelines* (2002), which provide details about the requirements for this plan. The ambient criteria are applied everywhere in the open air, including residences, businesses, and parks.

Table 1.1 Ambient air quality guidelines for particulate matter

Pollutant	Concentration limit ($\mu\text{g}/\text{m}^3$)	Averaging period	Comment
PM ₁₀	50	24 hours	Allowance of one exceedance per year
	20	Annual	-
PM _{2.5}	25	24 hours	-
	10	Annual	-

The Ministry for Environment's *Good Practice Guide for Assessing and Managing Dust* has a 'trigger level' for managing Total Suspended Particulates (TSP) and PM₁₀. These are values that can be used when there is an active monitor that provides feedback to an activity. Exceedance of these values, shown in Table 1.2 means there is a likelihood of exceeding the ambient air quality guidelines, if mitigations are not implemented. Thus, trigger levels may be considered a 'warning' that permits active operations to be modified before exceedances occur.

Table 1.2 Amenity air quality Trigger Levels for particulate matter in a high sensitivity environment

Pollutant	Averaging time	Trigger concentration ($\mu\text{g}/\text{m}^3$)
PM ₁₀	1 hour	150
TSP	5-minute	250
	1 hour	200
	24 hours	60

1.4 Revisions and updates

This Management Plan is not a static document. It is a working document that requires regular review and updating to ensure ongoing stability and effectiveness for environmental management of the construction process.

The Management Plan shall be reviewed and updated regularly:

- To remain consistent with relevant regulations and guidelines.
- Should improvements to the management measures be required.
- To take advantage of new technologies, innovations, and methodologies that are superior to the management measures presented in the current version of the management plan.
- After changes are made with regards to construction processes that may affect management measures in the current version of the management plan.
- If there are repeated non-conformances against dust objectives and targets outlined in Section 1.3.
- In the event of repeated complaints (more than once for the same aspect).

Changes made to the Management Plan, as well as the reasons for the changes made, will be documented as part of the review process. Copies of the original management plan, as well as all future versions of the management plan, shall be retained by Meridian and made available upon request. The most recent version will be implemented.

1.5 Responsibilities

The Meridian appointed Contractor for the rock protection works at Lake Pūkaki is responsible for ensuring the completeness and effective implementation of the Management Plan. To accomplish this, the contractor's employees will be trained in this plan and their responsibilities designated. Responsibilities will include the deployment, maintenance, monitoring and inspection of equipment and the performance of effective actions to control and minimise dust emissions.

The Site Manager is responsible for:

- Maintaining this plan.
- Providing training to staff.
- Providing guidance on dust control measures
- Ensuring inspections are being undertaken.
- Ensuring that proper records are maintained.

2. Site description

2.1 Location

Lake Pūkaki is located in the South Island of New Zealand and makes up part of the Mackenzie Basin. It is located approximately 200 km west-southwest of Christchurch, in the middle of New Zealand's South Island and almost directly south of Mount Cook (Aoraki).

Lake Pūkaki is approximately 30 km long (north to south) and 5 km wide (east to west). It is approximately rectangular in shape. The lake sits at the southern end of the Tasman River delta, which is comprised primarily of glacial till and sediments. The lake comprises a surface area of approximately 172 km² based on an average lake level of 528 m RL.

The Pūkaki High Dam is located at the southern end of the lake. The nominal flow direction in the lake is from north to south, with water discharging from the lake via Gate 18 (into the Pūkaki canal) or Gate 19 into the Pūkaki Riverbed.

The project Site will generally encompass the key areas shown on Figure 1,2 and 3. These are:

- The Northern and Southern stockpiles shown on Figure 1 and the associated haul roads providing access to SH8.
- The left abutment work area shown on Figure 2
- The right abutment and dam face work area shown on Figure 3.
- The sections of SH8 that provide connections between the above work sites

The final work site and boundary will be confirmed by the appointed contractor.



Figure 1 Stockpile locations



Figure 2 Stockpile locations



Figure 3 Stockpile locations

2.2 Background

Lake Pūkaki is a modified natural lake and is managed as part of the Waitaki Power Scheme. It is New Zealand's largest hydro storage lake and provides an average of 1,767 GWh of stored water in normal operating conditions, with an additional 546 GWh available during a national hydro shortage.

Meridian is currently authorised to dam the Pūkaki River to control and operate Lake Pūkaki between the levels of 518 m RL (normal consented minimum lake level) and 532.5 m RL (maximum consented storage level).

3. Programme of works

3.1 Proposed construction activities

When the lake levels are low, Meridian is proposing to extend rip-rap armouring to reduce the risk of erosion on the dam face and other critical infrastructure. Rip-rap currently exists along the dam upstream face; however the rock armouring is inadequate to protect the dam and associated infrastructure if water levels were drawn below 518 m RL. Further details on the required works are provided in GHD 2025B.

3.2 Programme

The rip-rap placement programme is scheduled to be completed over a period of approximately 18 weeks. This will likely occur in shorter phases over a period of several years, as lake levels allow.

The construction methodology is based on the following programme.

- Construction activities may be short in duration (a few weeks) and occur over multiple stages.
- It may take multiple years to complete all the required works.
- Access is expected to be more frequent at higher lake levels within the 518 m to 513 m range, rather than at the lower end.
- The assumed approach is for rip-rap placement in a multi-stage process with rip-rap being placed when lake levels allow.
- Forecasting lake levels within a period of a few weeks is generally achievable based on predicted generation flows from the lake, predicted inflows, and predicted rainfall events in a 1-to-2-week window.
- Based on this data, guidance can be provided to a contractor as to when lake levels are likely to reach required levels for construction to commence and how long they are likely to stay low in the short to medium term.
- Given the time required to mobilise and demobilise from the site, contractor guidance indicates that the minimum duration for any construction stage is 3 weeks.
- Inflow events, whether predicted or not, can result in a relatively rapid rise in lake level. Historical data indicates that the lake can rise up to 1 m in one day and 3 m in one week. Therefore, the construction sequence must include contingency plans for rapid site demobilisation, ensuring the site is left in a safe and environmentally appropriate condition prior to water inundating the works area.
- Historical data indicates that low lake levels at Lake Pūkaki most frequently occur during mid to late winter and early spring.
- Construction activities will be restricted to the following schedule:
 - Daily: 6:00 a.m. to 7:30 p.m.
 - No work during the following periods:
 - Good Friday to Easter Monday (inclusive)

- 24, 25 and 26 December (inclusive) and 31 December to 1 January (inclusive)
- New Zealand Public Holidays

3.3 Dust emission sources

Potential dust sources are grouped into the following:

- Material handling of rip-rap (storage, loadings onto trucks, unloading and placement). Note rip-rap materials that have been stored on site for a number of years and are not likely to be overly “dusty” due to exposure to rainfall and the generally very coarse nature of the materials.
- Haulage along identified, unpaved haul roads.
- Creation of temporary haul roads on the abutments and upstream dam face to facilitate rip-rap works (see Figures 2 and 3 for approximate locations).
- Temporary stockpiling of excavated materials to allow access and rip-rap placement on the dam face.

4. Surrounding environment

4.1 Sensitive receptors

A detailed list of identified potentially sensitive receptors around the whole lake is provided in GHD (2025A). A consolidated list of lake environs receptors is also provided in GHD (2025A).

The sensitive receptors closest to the dam earthworks sites (and potentially most affected by proposed construction activities) are identified as the following:

- A residence is located about 760 m from the Left abutment work site.
- A publicly accessible observation and photo point immediately adjacent to the Left abutment site. This is a place where people will transit through.
- A business (Mt Cook Alpine Salmon Shop) is immediately adjacent to the Right abutment construction site, but it is to be closed for the duration of any works and is therefore not required to be assessed.
- The Pines freedom camping area is considered to be potentially the most exposed to a potential change in air quality associated with the proposed works, located at a distance of about 105 m from the northeast corner of the Left abutment construction site.
- A second freedom camping location is considered to have high exposure but less than the one described above due to a greater distance from the Left abutment work zone.

4.2 Baseline data

No site-specific baseline air quality data is available. GHD 2025A utilised background dust data from the New Zealand Transport Agency (NZTA) that is focussed on urbanised areas.

5. Dust management

The main features of the dust management strategy are based on prevention, mitigation, and rectification. The mitigation and rectification measures will be implemented as required and their exact details will be determined on a

case-by-case basis depending upon the situation and the technical solutions available at the time. The proposed management strategies are described in the following sections.

5.1 Prevention measures

The following prevention measures should be taken at the Project site:

- Prepare dust management education material for inclusion in site inductions, training, and daily toolbox meetings.
- Prepare and undertake a regular audit to ensure compliance with conditions of the permit (at least once during any construction event or monthly for longer construction events). Audit records should be stored in the Site Office.
- Plan construction activities to keep exposed areas to a minimum and, where possible, avoid scheduling major emissions-generating activities to occur at the same time.
- All plant and equipment should be fitted with the appropriate emissions controls and maintained according to the manufacturer's specifications.
- Implement on-site traffic and operational controls to prevent unnecessary dust generation from vehicle movements, including:
 - Regular watering of access roads if rainfall is insufficient to suppress dust (see below for suggested watering rates).
 - Trucks transporting material may need to be covered (depending on the nature of the materials and climatic conditions)
 - Ensure tailgates are firmly fixed
 - Enforce speed limits.
- Bins, rubbish, and storage areas will be monitored during regular audits and emptied at regular intervals.

On-Site Weather Station

To assist in site management the Contractor will install an on-site weather station during any periods of construction work to monitor wind and rain conditions. The data will be used to support decision making regarding dust mitigation activities and will provide a record of site conditions.

The weather station will:

- Measure wind speed as 1-minute scalar averages with maximum resolution of 0.1 metres per second (m/s), have an accuracy of at least within +/-0.2 m/s, and a stall speed no greater than 0.5 m/s;
- Measure wind direction as 1-minute vector averages with maximum resolution of 1.0 degree and accuracy of at least within +/- 1.0 degree, and a stall speed no greater than 0.5 m/s;
- Measure screened temperature with accuracy of +/- 0.5 degree;
- Measure relative humidity with an accuracy of +/- 1%;
- Measure rainfall with an accuracy of +/- 0.2mm;
- Be located on or immediately adjacent to the site in accordance with AS/NZS 3580:14-2014 (Methods for sampling and analysis of ambient air – Part 14 Meteorological monitoring for ambient air quality monitoring applications). If the monitoring station cannot be located in accordance with AS/NZS 3580:14-2014 an alternative location shall be agreed in writing with Environment Canterbury;
- Maintain a date and time stamped electronic record of meteorological monitoring results, recorded as rolling 10-minute averages, which are up-dated every one-minute in real-time.

- Send an alarm to the Site Manager (for example via mobile phone) if the wind speed trigger level is reached or exceeded 9 trigger level to be agreed in final plan).
- Be maintained and calibrated in accordance with the manufacturer's specifications.
- All meteorological monitoring data shall be made available to the Environment Canterbury on request.

Water Requirements

The general guidance on water requirements is based on the Australian NPI Mining EET. The rates and reductions are specifically applicable to coal mines in Australia, which typically experience much lower levels of annual rainfall and have similarly drier soils than the project site.

A conservative estimate is that dust generating areas of track and other dust generating areas should be watered starting 12 hours after no rainfall (assuming sandy soils that dry quickly) at a rate of 1 Litre/m²/hour. However, if dust liftoff is observed from roads or stockpiles, water application rates should be applied at a rate of 2 Litre/m²/hour.

Additional prevention measures

In addition to the operational preventive measures outlined above, the Contractor will consider the following measures to prevent exposure to dust emissions:

Weather forecast

- Assess upcoming weather conditions for the day and plan site activities accordingly. Pay particular attention to periods of forecast or observed high winds.
- If meteorological conditions deteriorate consider:
 - Modifying or ceasing activities that generate dust which have a direct impact at nearby sensitive receptors, or
 - Adding additional mitigation measures at source to control adverse dust conditions.
- This may include:
 - Ceasing dust generating construction activities within 200 m of a sensitive receptor location when wind speed reaches or exceeds 7 m/s (10 minute scalar average) and activities would be upwind of the sensitive receptor (10 minute average wind direction).

Restricting public access

- Consider closure of the public toilets immediately adjacent to the construction area.
- Short-term closure of the campsite to the north of the left abutment construction area when construction works are being undertaken and conditions are adverse.

Air quality monitoring

Air quality monitoring can be undertaken at any time at the discretion of the Contractor and Meridian but is required to be implemented during any construction event if the following occur:

- Visible dust is observed leaving the Site boundary after the application of controls described in Section 5.1 and 5.2; or
- Three or more complaints are received from the public or nearby residents.

If required, air quality monitoring will be undertaken at locations that can be used to best assess potential offsite dust emissions. Likely locations are southeast of the primary stockpile site to enable the effect of the frequent norwest winds to be assessed, and/or near the campsite adjacent to the left abutment.

Dust deposition gauges offer the simplest method of assessing dust, however, the requirement for immediate feedback and ability to provide this feedback in a cost-effective way needs to be considered when determining the most appropriate measurement method.

Should air quality monitoring be implemented at the site, a Trigger Action Response Plan (TARP) will need to be developed for use in conjunction with this Management Plan. This will include agreed trigger PM₁₀ concentrations and agreed responses.

5.2 Mitigation measures

The following mitigation measures are to be taken at the Project site:

- Perform daily inspections for visible emissions along the site boundary of the Project site (see Appendix A.1 for draft recording form).
- Use dust suppression techniques (such as watering via watering trucks or sprinkler systems) as needed to maintain moist conditions on cleared or exposed areas, unsealed roads, temporary stockpiles, and high dust generating activities (see Section 5.1 for proposed watering rates).
- Retain as much vegetative screening between the Project site and the nearest sensitive receptors as possible.
- Instigate progressive rehabilitation as soon as practicable to encourage the establishment of vegetation (where appropriate) as soon as possible after the completion of works.
- Consider covering loads in trucks, or spray loads as an alternative if transported materials warrant these measures.
- Consider installing wind breaks surrounding primary temporary stockpile locations. Given the often-extreme wind conditions experienced at the site, porous wind breaks should be considered in favour of solid wind breaks. Whilst this is a less effective mitigation measure, it will ensure that the wind break does not become a safety hazard under excessive load.

5.3 Rectification measures

The following rectification measures are to be taken at the Project site:

- Record environmental complaints and maintain regular reviews and reporting of performance. Complaints made during an initial block of works will inform preventative measures to be undertaken during subsequent construction works (see Appendix A.3 for Draft Complaints Report form).
- Consider increasing water sprays as needed (see section 5.1) and/or cover temporary stockpiles when not in use.
- Develop alternative methods to reduce dust generation.

5.4 Corrective actions

Corrective actions are to be undertaken to a level proportional to the severity of complaint. Upon receipt of a valid complaint, the following tasks will be undertaken:

- Conduct a detailed review of all on-site activities undertaken at the time when the complaint was received.
- Identify key on-site activities contributing to off-site impacts. This will be achieved by:
 - Undertaking a visual inspection of construction processes and activities to ascertain the source of dust emissions relevant to the complaint.
 - Assessing weather data during the time period for which the complaint was made.
- Upon identification and attribution of the likely activities/sources responsible for the complaint, revised operations or additional mitigation measures will be trialled to improve (reduce) emissions from the source.

- If the trial proves effective at managing the source, a revision to the standard operating procedures will be documented and implemented across site. If the trial did not prove effective, alternative mitigation options may be trialled until an effective solution is found.
- Once investigations are complete, a response will be provided to the complainant setting out the findings and conclusions (see Appendix A.4 - template to be added by Contractor once appointed).

5.5 Site Management After Hours

- A site contact will be available at all times, including outside normal working hours, to respond to any complaints or incidents. Signage will be provided on the site boundary with this information.
- The site will be left in a condition that minimises the potential for dust generation at the end of each work period, including stabilisation of exposed surfaces where practicable.
- Dust-prone areas, such as access roads and disturbed surfaces, will be appropriately treated prior to leaving site (e.g. watering or compaction where required).

5.6 Site Closure

As discussed in Section 3, the works are likely to be undertaken over several discrete periods of activity. Several months or years may elapse between periods of construction. Therefore, the site must be left in a condition that minimises the potential for dust generation to the extent practicable at the end of each construction event. As outlined in GHD 2025A, this will include:

- Removal of temporary stockpiles and haul roads on the dam face and abutments and restoration (likely with rip-rap that has been temporarily removed). Some sections of temporary haul road may be left in place but they must be left in a non-dust generating condition.
- Any areas of the rock storage sites which will no longer be required for storage will be restored to a vegetated condition similar to the surrounding site.
- Any other potential sources of significant dust generation will be remediated, as required.

Once all the works are complete, a similar approach to completion of the works will be adopted. Note that the rock storage sites will continue to be required beyond this project. rock is stored at the site for a variety of purposes in addition to this project.

5.7 Training

All personnel should receive induction training prior to entering site. Training should include:

- Location of sensitive receptors.
- Implementation of the dust mitigation measures outlined above.
- Roles and responsibilities regarding dust mitigation and management.
- Incident response, management and reporting procedures.
- Environmentally safe work methods relating to dust.

Supervisors and workforce representatives that are nominated to undertake monitoring and inspections will be trained specifically for this task. Mitigation measures outlined above will be consistently covered in toolbox talks to serve as a reminder to the workforce.

Other specific topics covered by the toolbox talks will be planning and preparation for high wind or regional dust events. Lessons learned during the construction and operation of the site and updates to this Management Plan will be communicated to the workforce in toolbox talks.

A log of site staff training is to be maintained (see Appendix A.2 -form to be added by Contractor once appointed).

5.8 Consideration of cultural impacts

It is recognised that temporary restriction of access to areas around the lake could have cultural impacts. Therefore, any discussions and decisions should be made with consultation between all potentially affected parties.

5.9 Communications strategy

Meridian are to develop and implement a communications strategy that includes stakeholder engagement procedures. The communications strategy should include, but not be limited to:

- Procedures for issuing works notification to nearby residents and property owners to inform them of Project staging and operational activities.
- Provides communications avenues for members of the public to ask questions and lodge complaints regarding the operations of the site.

Notification regarding specific construction activities should be provided to adjacent residents and property owners likely to be affected by dust emissions from works. Such notification should be provided prior to the activity commencing (typically one week notice) and should provide the following details:

- the reason for the activity
- types of equipment required
- the expected commencement of the activity
- activity hours of operation
- the likely duration and impact of operation at the site and any requirement for subsequent additional works
- contact details for further information and complaints.

Schedule daily follow-ups and check-ins with adjacent residents and property owners regarding dust impacts, where reasonable and practicable.

6. Continuous improvement

This Dust Management Plan is a Site-specific document that identifies fugitive sources of dust emissions from the Site and the Best Management Practices for controlling these sources. This plan will be reviewed and updated on an annual basis, or more frequently as required to reflect changing Site conditions. It will build on current and known practices with a commitment to continuous improvement.

7. References

GHD 2025A - Lake Pūkaki Hydro Storage and Dam Resilience Works – Air Quality Assessment – Rip-Rap Placement. Prepared for Meridian Energy by GHD 5 Nov 2025

GHD 2025B – Lake Pūkaki Hydro Storage and Dam Resilience Works - Pūkaki Dam Rip-Rap Design and Construction Methodology. Prepared for Meridian Energy by GHD 26 Oct 2025.

8. Version control

Table 8.1 Document Version Control

Version	Date	Description of Changes
1.0	5/11/2025	DRAFT
2.0	23/01/2026	DRAFT – added draft forms
3.0	26/02/26	DRAFT – updated text
4.0	13/04/26	Description of the “Site” added Construction of temporary haul roads included as an activity Trigger levels defined for dust monitoring Wind speed and direction trigger levels included for sensitive receptors After hours and site closure activities included Water requirements included Requirement for a weather station

Appendices

Appendix A.1

Daily Inspection/Maintenance Report

Daily Inspection Record / Maintenance Report



Lake Pukaki Hydro Storage and Dam Resilience Works

Day		
Construction works underway:		
Date		
Time		
Inspector name		
Monitoring Location / Work Zone		
Wind Direction		
Wind Speed		
Rain forecast / Actual rain for the day (mm)		
Dust Monitoring (e.g. visual, air sampling pumps, OPC / CPC)		
Dust Rating 1-5 (1=Ok, 5= no visibility)		
Dust Source		
Dust management and mitigation controls implemented		
Stockpile(s) condition (e.g. dust generation)		
Noise reading (dBa)		
Road inspection (material tracking)		
Complaints received (if yes add details)		
Environmental Management Plan and Erosion and Sediment Control Plan Observations		
General Site Observations		

Appendix A.2

Site Training Log

Appendix A.3

Dust Complaint Report

Dust Complaint Report



Lake Pukaki Hydro Storage and Dam Resilience Works

Date: Time:

Complainant Details

Name:
Contact:

Receiver Details

Name:
Contact:

Complaint Details

Investigation and Assessment

Physical Location of the Complaint:

Or indicate below

Wind Direction at the Time:

Or indicate below



Wind Speed at the Time:

Most Likely Cause of Dust:

Corrective Action:

Closeout Detail:

Appendix A.4

Complaint Response Letter

