Appendix A – Comments on conditions

1. Suggested amendments are shown as red underline, and/or red ~~strikethrough~~. In some cases, specific wording has not been proposed by DOC.
2. Full wording of draft conditions can be found in Attachment 0B1 of the application documents – in some cases, wording has been shortened for the purposes of readability and use of use of this table.
3. Changes to Wildlife approval conditions as set out in the Department's s51 report, and as amended through this s53 report, are set out in **Appendix B.**

#	Draft condition	DOC Suggested changes	DOC comments
New conditions	Conditions relating to management plans and the implementation of management plans	The Department seeks changes in relation to management plan conditions and the inclusion of new conditions to ensure that: • Each management plan condition contains an objective, and a comprehensive list of requirements of what should be included in the management plan • Any limits, standards, or specific requirements set out in a management plan must be included as a condition of consent	The Department has noted that some of the management plans that have been submitted as part of the application do not contain objectives and/or a comprehensive list of information requirements. In addition, management plans put forward specific limits or restrictions (such as construction limits) that should be included in conditions of consent in order to ensure compliance and enforceability through monitoring. Where possible, the Department has provided specific comments on management plans and associated conditions, however, it is considered that there are likely to be additional changes required to conditions to address this matter.

Erosion and Sediment Control Adaptive Management Plan (ESCAMP)			
38(a)	The Freshwater Baseline Report must include as a minimum, information on the following matters: ○ sediment quality such as description of sediment inputs, transport, substrate composition and embeddedness. ○ water quality measurements such as total suspended solids (TSS) and turbidity. ○ actual and potential inanga (Galaxias maculatus) spawning habitat. ○ identify the pre-construction condition of any Erosion Prone Streams against which to measure construction effects and possible mitigation measures. ○ The presence of any threatened aquatic species or habitat, susceptible to sediment discharge.	The Department seeks that this condition is amended to include the requirement for wetland monitoring of vegetation and hydrology.	Inclusion of wetland monitoring provides an important baseline to enable effective monitoring of effects on wetlands.
Geotechnical and Earthworks			
New condition	New condition – earthworks	Prior to the commencement of earthworks, all protected vegetation within the EPAN shall be clearly demarcated on the ground.	The purpose of this condition is to ensure protection of vegetation in the EPAN during earthworks.
New condition(s)	New condition – earthworks	The Department recommends a new condition is inserted specifying the maximum area of vegetation to be cleared, and the minimum area of revegetation required. Conditions should be supported by maps that identify the approximate locations for vegetation clearance and revegetation.	The consent conditions do not currently state the maximum area of vegetation to be cleared within the site to facilitate bulk earthworks, residential development, roading, infrastructure, stormwater management devices, and associated

			works. The conditions also do not state the minimum area of revegetation required to address the loss of vegetation.
Noise			
71-76	Conditions relating to construction noise – refer to wording in Appendix 0B1 of the application documentation.	Addition of specific limits to manage underwater noise effects on marine mammals. These conditions should refer to and align with the information set out in the Marine Mammal Management Plan (MMMP).	General construction noise condition limits may not equate to the levels of underwater noise that can cause auditory injury or temporary threshold shifts (TTS) to marine mammals. Where appropriate, general conditions should reference limits identified in the MMMP.
New condition	New condition(s) – Lighting	A new condition requiring management of artificial lighting may be required.	Pending further information from the applicant, it may be appropriate to manage the effects of artificial light on bats by way of artificial lighting conditions.
Ecological Protected Area Network			
78	Vegetation alteration or removal within the Ecological Protected Area Network (excluding high value terrestrial and wetland vegetation) to form pedestrian and cycle paths shall be permitted.	Vegetation alteration or removal within the Ecological Protected Area Network (excluding high value terrestrial and wetland vegetation as shown on I458.10.2 Precinct Plan 2 – Natural Features of the Auckland Unitary Plan) to form the indicative pedestrian and cycle paths as shown on Precinct Plan 5 of the Auckland Unitary Plan shall be permitted.	Condition 78 permits vegetation clearance to form pedestrian and cycle paths. This condition appears to have been informed by Chapter I458 of the AUP2 which more specifically permits vegetation alteration or removal within the Ecological Protected Area Network (excluding high value terrestrial and wetland vegetation) to form the

			indicative shared path links as shown on Precinct Plan 5. The Department recommends that Condition 78 amended to only permit specific identified pedestrian and / or cycle paths. As a more general comment, the Department also recommends that conditions referring to 'high value terrestrial and wetland vegetation' (i.e., Conditions 78, 79) are amended to include the statement "as shown on I458.10.2 Precinct Plan 2 – Natural Features of the AUP" which identifies these areas.
80	A final Riparian Planting Plan and Biodiversity Management Plan must be prepared by the Consent Holder in accordance with AUP standards I458.9(1) and (2) and be submitted to the Council for certification prior to any works (other than those permitted by conditions [76] to [78]) commencing within the EPAN. These plans shall specify the timing that the required planting and proposed works will be given effect to.	The Department recommends that additional conditions are included outlining the purpose of the plan (i.e., to provide a framework for implementing biodiversity restoration, enhancement, maintenance and monitoring within the EPAN and other ecological management measures including the freshwater compensation wetland, riparian margins outside the EPAN, to deliver a net positive ecological outcome over the long term), and minimum information requirements additional to those specified in the AUP Standards. The requirement for a Wetland Hydrology and Biodiversity Monitoring Plan should be added as a new condition, or should be explicitly set out as a requirement to be added to the Biodiversity Management Plan.	It is best practice that a management plan purpose and objective is specified in conditions, and that conditions outline minimum information requirements. Inclusion of a Wetland Hydrology and Biodiversity Monitoring Plan ensures the effective implementation of the applicants' proposed mitigation measures in relation to effects on wetlands.
Lizard and Bat Management Plan (LMBP)			

86 – 87	Conditions relating to the preparation and implementation of a Lizard and Bat Management Plan	The Department recommends that the conditions are amended to include a requirement to prepare and implement management plans (either individual plans or a combined fauna management plan) for lizards, bats and avifauna, and that the conditions include plan objectives, methods, and key information requirements specific to each.	The EIA states that the Fauna Management Plan (FMP) will be implemented prior to and during vegetation clearance works to minimise potential adverse effects on indigenous fauna, including management measures for indigenous birds, lizards, and bats. However, the consent conditions only reference the FMP in the definitions section of the proposed consent conditions, and in the Wildlife approval conditions. The conditions do include a requirement for a Lizard and Bat Management Plan (LBMP) (condition 86-87), which is a special information requirement under Chapter I458 of the AUP[1]. However, the LBMP conditions only contain objectives and information requirements specific to lizards. The Department recommends that further consideration is given to these conditions and management plans, such that all relevant matters are covered for birds, lizards and bats. It is noted that the Wildlife conditions for lizards refer to the Fauna Management Plan.

New condition	New condition – tree felling	Any tree removal must be undertaken in accordance with 'Protocols for minimising the risk of felling bat roosts' (version 2 October 2021 or the most recent version available).	The Department recommends the inclusion of an additional condition requiring that any tree removal be undertaken in accordance with the bat roost protocols. This is consistent with the recommendations in the Ecological Impact Assessment.
New condition	New condition – stopping works	If any protected bird, bat, lizard is found during vegetation clearance, earthworks, or construction activities, works within the immediate vicinity must cease as soon as it is safe to do so and relevant accidental discovery, injury or mortality procedures in the management plan must be followed.	The Department recommends this condition to implement the requirements of the Fauna Management Plan (or future Lizard and Bat Management Plan) and to avoid loss or injury to protected species.
New condition	New condition – vegetation clearance	The removal of any tree or shrub vegetation outside the CMA must occur outside of the main terrestrial bird nesting season (September to February inclusive) where possible. If tree clearance is unable to occur outside of breeding season, a suitably qualified ecologist must inspect the affected vegetation within 24 hours prior to clearance. If inspections identify any active nests of avifauna species that are Threatened, At Risk, or protected under the Wildlife Act 1953, a minimum 100 m buffer must be maintained around the nesting site until a suitably qualified ecologist has confirmed the nest is inactive. For other avifauna species, a 20 m buffer must be maintained until a suitably qualified ecologist has confirmed the nest is inactive.	The Department recommends that an additional condition is included to reflect the recommendations of the Ecological Impact Assessment regarding the management of adverse effects of vegetation removal on avifauna outside the CMA. The Department recommends that a more appropriate buffer distance of 100 m is required and that the buffer also apply to avifauna protected under the Wildlife Act 1953.

New condition	New condition – vegetation clearance	Within 24 hours prior to any vegetation clearance within 100 m of constructed ponds, a suitably qualified ecologist must inspect the vegetation for indigenous bird nests. If inspections identify any active nests of avifauna species that are Threatened, At Risk, or protected under the Wildlife Act 1953, a minimum 100 m buffer must be maintained until a suitably qualified ecologist has confirmed the nest is inactive. For other avifauna species, a minimum 10 m buffer must be maintained until a suitably qualified ecologist has confirmed the nest is inactive.	As above, the Department recommends an additional condition to reflect the recommendations in the Ecological Impact Assessment, with amendments to buffer zones and specified avifauna.
New condition	New condition – Vegetation clearance	Earthworks must be undertaken in accordance with the FMP to minimise the risk of New Zealand dotterels establishing nests within active construction areas. Where suitable nesting habitat develops during the breeding season, appropriate deterrence measures and monitoring must be implemented, and any nests identified should be managed in consultation with a suitably qualified ecologist.	The purpose of this condition is to minimise the risk to dotterels during construction, in line with the requirements of the FMP.
New condition	New condition – Vegetation clearance	Insertion of a condition specifying the timeframe within which works must start following a pre-works survey for nesting birds, stating that vegetation clearance must commence within 24 hours of a pre-works survey being undertaken. This should include areas of open ground.	Insertion of this condition will minimise the potential for birds to re-inhabit the surveyed area prior to the vegetation clearance being undertaken.
Marine Ecology			
88	Vegetation removal within the CMA must be undertaken outside the main native bird breeding season (September to January inclusive) except where a suitably qualified ecologist has confirmed to the Consent Holder in writing that vegetation is clear of any native nesting birds, eggs, or chicks.	Vegetation removal within the CMA must be undertaken outside the main native bird breeding season (September to ~~January~~ February inclusive) except where a suitably qualified ecologist has confirmed to the Consent Holder in writing that vegetation is clear of any ~~native~~ protected nesting birds, eggs, or chicks.	Suggested changes align conditions with best practice and ensure mitigation measures proposed by the applicant for effects on avifauna are effectively implemented. Further consequential changes to this condition may be proposed, pending further information provided by the applicant and changes to relevant management plans.

89	Should an active nest be found, a 50 m exclusion zone must be demarcated for any Threatened or At Risk native bird species, and a 20 m exclusion zone for any Not Threatened native bird species. Works must remain outside of this zone until the chicks have fully fledged.	Should an active nest be found, a ~~50~~ 100m exclusion zone must be demarcated for any species of avifauna that is Threatened, ~~or~~ At Risk ~~native bird species~~ or protected under the Wildlife Act 1953, and a 20 m exclusion zone for any ~~Not Threatened native~~ other bird species. Works must remain outside of this zone until the chicks have fully fledged. Exclusion zones may only be reduced on advice of a suitably qualified ecologist. The date, time and location of the nest should be recorded, and a photograph of the nest and/or birds should be taken, if possible.	The Department considers that the exclusion zones specified in Condition 89 do not consider all protected avifauna species and are insufficient to minimise disturbance to nesting avifauna. Further consequential changes to this condition may be proposed, pending further information provided by the applicant and changes to relevant Management Plans.
New condition	New condition – piling	Insertion of a new condition limiting piling works to non-breeding bird seasons	Insertion of a new condition to limit piling works to non-breeding bird seasons limits disturbance to birds during breeding season.
90	Prior to the coastal walkway becoming operational a final Coastal Bird Management Plan, addressing the following, is to be submitted to Council for certification: (a) The control of mammalian predators along the coastal margin including dogs and domestic cats; (b) The enhancement of existing nesting and roosting sites in the adjacent coastal marine area including elevation and expansion of shell banks and invasive weed and mangrove management; (c) The enhancement and maintenance of high-quality coastal bird foraging habitat in the inter-tidal mud/sand flats within the adjacent coastal marine area including selective mangrove management; (d) Controls to minimise disturbance to roosting or nesting coastal birds; and	Prior to the coastal walkway becoming operational a final Coastal Bird Management Plan, addressing the following, is to be submitted to Council for certification: (a) The control of mammalian predators along the coastal margin including dogs and domestic cats; (b) The enhancement of existing nesting and roosting sites in the adjacent coastal marine area including elevation and expansion of shell banks and invasive weed and mangrove management; (c) The enhancement and maintenance of high-quality coastal bird foraging habitat in the inter-tidal mud/sand flats within the adjacent coastal marine area including selective mangrove management; (d) Controls to ~~minimise~~ avoid disturbance to roosting or nesting coastal birds; and	The Department considers that the proposed changes are required to address potential effects on coastal birds, and ensure on-going monitoring to determine the effectiveness of mitigation measures.

	(e) A framework for monitoring and adaptive management.	(e) A framework for monitoring that includes annual monitoring from year one to five, and five-yearly thereafter, including a map of areas to be surveyed (f) a framework for adaptive management.	
Subdivision - Ecologically Protected Area			
181 - 182	Any application for subdivision within the precinct must include the following on the subdivision scheme plan, as identified on Precinct Plan 2: (a) Areas subject to the EPAN and/or any additional areas proposed to be planted as part of any ecological offsetting or compensation proposition; (b) Areas subject to the Significant Ecological Area – Terrestrial overlay; (c) High Value Terrestrial Planting areas; (d) Wetland Margin Buffer Planting areas; (e) Indicative Native Revegetation areas; and (f) Identified archaeological sites. The areas listed in condition [180] above must be legally protected and maintained by a covenant (or other legal protection mechanism) on the Certificate of Title for each site within the precinct where they are not vested with the Council. The covenant (or other legal protection mechanism) must require the areas listed in condition [180] above to be revegetated, maintained, restored and enhanced in accordance with the Biodiversity Management Plan required in condition [78]. The covenant (or other legal mechanism) must require every landowner within the precinct	Amend conditions to provide clarification on the protection of the EPAN.	The Department considers that the conditions proposed are unclear as to when the legal protection requirement for the EPAN arises, i.e. whether it is at the time of granting of this consent, or further consents. Conditions should be amended to require protection of the EPAN from the granting of the original consent.

	to be a member of a Residents Society (or similar) that will manage the areas listed in condition [180] above and contribute a proportional sum each year to ensure the Biodiversity Management Plan is implemented on an on-going basis.		
Environmental Monitoring and Water Efficiency Report			
228-278	Draft conditions relating to the Formosa Bore Water Permit and 620 Whitford-Maraetai Road Bore Water Permit	Relevant conditions should be amended to require wetland hydrological monitoring for the compensation wetland	Requiring wetland and hydrological monitoring ensures the effective implementation of the applicants' proposed mitigation measures in relation to effects on wetlands.
Marine Mammal Management Plan			
288	The Consent Holder must develop a Marine Mammal Management Plan (MMMP), which must include monitoring and mitigation measures employed during works to manage effects on these marine mammal species. Mitigation measures to be including in the MMMP shall include the following: (a) Measures to control noise at source through the use of a soft, sacrificial dolly on top of the pile; (b) Use of a bubble curtain around the piling, such as Bubble Tubing from Canadian Pond, if this is found to be practicable,; (c) Limiting piling to day light hours to allow for observations of marine mammals and penguins.; (d) Use of an observer, or observers, during the piling to watch for marine mammals and	The Department recommends that the MMMP condition is amended to include the following: 1. MMMP should be prepared by a SQEP. 2. The MMMP should include the following information: a. identification of person responsible for implementation, b. monitoring and reporting, description of marine mammal observer qualifications and training requirements, establishment of pre-start, operational, shutdown and restart procedures. c. Bubble curtain specifications d. Adaptive management responses where measured noise exceeds predictions, and incident reporting requirements. e. Specification of marine mammal observation zones (MMOZ) (which are also the 'stop-work' zones), which should be derived from verified underwater noise measurements.	The Department recommends additions to the MMMP condition in line with its evidence. It is considered that these requirements are necessary in order to ensure effective implementation of the mitigation measure proposed by the applicant. It is noted that the acoustic report provided with the application had varying distances depending on species, but that requires the observer to confidently, accurately and promptly identify marine mammals from a distance.

	penguins entering the safe piling zones. Should marine mammals or penguins be identified, work shall stop until the all clear is given; (e) Observations shall start a minimum of 30 minutes prior to the commencement of piling. (f) Piling shall adopt a soft start procedure that is 30 minutes in duration.	f. Vessel operating procedures consistent with the Marine Mammals Protection Regulations 1992.	The Department recommends one MMOZ based on the noise measurements.
289	A record book of marine mammal observations must be maintained onboard each vessel and made available to the Council or iwi monitoring nominee on request.	A record book of marine mammal observations must be maintained onboard each vessel and made available to the Council, Department of Conservation or iwi monitoring nominee on request.	The suggested change reflects the Department's statutory role in relation to marine mammal wellbeing.
Section L - Conditions of Wildlife Approval	Various conditions relating to Wildlife approval.	Refer to **Appendix B** of this report. Original changes as proposed through the s51 report are shown in red underline or strikethrough. Suggested amendments through the s53 report are shown as green underline or strikethrough. A table has been inserted for the first section of conditions.	Proposed changes improves readability of the Wildlife approval, and also

Appendix B – Proposed wording for Wildlife Approval conditions

1	**Approved activity**	*Activity* i. Catch alive and liberate protected wildlife for the purpose of salvage, to protect lizards from adverse effects associated with earthworks, excavation and vegetation removal/replanting. ii. Incidentally kill protected wildlife, as a result of unsuccessful salvage or any activities undertaken in relation to the Beachlands South development, provided all reasonable steps are taken in accordance with this approval to avoid killing wildlife. *Species* i. Copper skink *Oligosoma aeneum* ii. Forest gecko *Mokopirirakau granulatus* iii. ~~Elegant gecko *Nautilnus elegans*~~ Ornate skink *Oligosoma ornatum* *Methods* In accordance with the conditions specified in this Authority and the ~~Draft Lizard and Invertebrate Management Plan~~ Fauna Management Plan dated 12 August 2026 and prepared for Beachland South Limited Partnership, attached to this application.
2	**The Holder**	Beachland South Limited Partnership
3	**The Land**	110 Jack Lachlan Drive, 620, 712, 758, and770 Whitford-Maraetai Road, Beachlands, Auckland
4	**Personnel authorised (Project ecologist)**	~~[Name] – lizards may only be handled by [Name], or under their direct supervision.~~ i. Chris Wedding ii. Dylan van Winkel iii. Suitably qualified personnel under the direct supervision of the named personnel. iv. Additional personnel as may be approved in writing by the Department
5	**Term**	~~10 years from the date of approval.~~ For a period of 10 years commencing on and including [insert date] and ending on and including [insert date].

Special Conditions

Adherence to approved application

1. The Authorised Activity must be undertaken in accordance with the LBMP required by resource consent condition [84].

Timing

2. Lizard capture, handling and relocation must only be undertaken between 1 October and 30 April when lizards are most active.

Capture and handling methods

3. Capture and handling methods must involve only techniques that minimise the risk of infection or injury to the animal and shall follow those described in the Herpetofauna inventory and monitoring toolbox http://www.doc.govt.nz/our-work/biodiversityinventory-and-monitoring/herpetofauna/.

4. Lizards must only be handled by the project ecologist or under the direct supervision of the project ecologist. The project ecologist must be a suitably qualified expert. For the purposes of this condition, suitably qualified expert means the Department of Conservation Operations Manager for Auckland has confirmed in writing that the person has appropriate experience and credentials in handling lizards and overseeing lizard salvage operations, or the person is listed at point 4 in the table above.

5. Capture and handling of lizards must involve only techniques that minimise the risk of infection or injury to the animal.

6. All live capture traps must be covered to protect lizards from exposure and minimise stress. Damp leaf litter or other material must be provided to reduce desiccation risk, and the bottom of the pit-fall trap must be perforated to allow drainage of water.

7. All live capture traps, (e.g. pitfall traps and G-minnow traps), must be checked at least once a day.

8. Any instruments that come in contact with lizards and/or are used to collect or measure lizards between each location must be sterilised. A separate holding bag must be used for each animal. All gear should be thoroughly cleaned and dried between sites.

9. Any captured lizards must be held individually in a suitable container (e.g. breathable cloth bag) and held out of direct sunlight to minimise the risk of overheating, stress and death.

Incidental discovery

10. The Department of Conservation (DOC) Operations Manager for Auckland is to be contacted immediately (auckland@doc.govt.nz) for further advice if wildlife other than copper skink, forest gecko, and/or elegant gecko are located within the footprint of the development or within the release site.

Death of wildlife

11. If any lizards should die as a result of or in the process of carrying out the Approved Activity of catch alive and liberate for the purpose of salvage, the Approval Holder must:

    (a) inform the Auckland DOC Operations Manager (auckland@doc.govt.nz) within 48

hours, chill the body if it can be delivered within 72 hours, or freeze the body if delivery will take longer than 72 hours; and

(b) send the body to Massey University wildlife postmortem service for necropsy OR as otherwise advised by the Auckland DOC Operations Manager, along with details of the animal's history; and

(c) pay for any costs incurred in investigation of the death of any lizard; and

(d) if required by the DOC Auckland Operations Manager, cease the Approved Activity for a period determined by the DOC Operations Manager.

Euthanasia

12. If any lizards are found injured during exercise of the Approved Activity, the Approval Holder must contact the Project Ecologist for advice on management of the lizard. The Approval Holder is authorised to euthanise injured lizard(s) on recommendation of the Project Ecologist or a veterinarian.

Reporting

13. Annual reports summarising lizard salvage and relocation activities are to be prepared and submitted to ~~DOC within 30 days from the completion date of the work in each period described in Condition [4].~~ the DOC Operations Manager for Auckland (auckland@doc.govt.nz) and askpermissions@doc.govt.nz annually on the 30th June each year in which salvage is undertaken, for the life of this approval. Specifically, this report is to include:

    Results of lizard salvage and relocation work. Should native lizards be found, then the following also is to be included in the report:

    i. Photos of lizard salvage methods utilised;

    ii. Photos of lizards captured (including photos of the salvage and relocation areas); and,

    iii. A map showing the location of each lizard upon capture and upon release, and

    iv. The species and number of any lizards detected, captured, and released, and

    v. The results of all surveys and monitoring.

    Descriptions of how lizard management activities outlined in the LBMP were followed, including conditions detailed in the Approval and associated resource consent conditions;

    An Amphibian and Reptile Distribution Scheme (ARDS) card detailing information relating to captured lizards (also to be provided to herpetofauna@doc.govt.nz); and,

    A brief summary regarding the outcomes of the LBMP, including any improvements/changes that should be implemented in future.

14. A completion report within one month of vegetation removal should be submitted to Auckland Council and the DOC Operations Manager for Auckland (Auckland@doc.govt.nz)

Habitat reporting

15. For the life of this Approval, the Approval Holder must provide annual reports to DOC on the

following activities:

a) Baseline lizard survey at restoration planting area

b) Photo record of lizard habitat development

c) Occupancy of plantings by native lizard

d) Number location and size of eco-stacks (rock and/or woody debris)

e) Number and location of artificial tree shelters.

Variations

16. The Approval Holder may apply to the Director-General for variations to this Approval in accordance with clause 7(2) of Schedule 7 of the Fast-track Approvals Act 2024. Until any application for variation is considered and approved in writing by the Director-General, the most recent approved version of this approval and Fauna Management Plan shall remain binding on the approval holder and will continue to be complied with.

Cancellation

17. The Director-General may revoke this Approval in whole or any part at any time (pursuant to clause 7(4) of Schedule 7 of the Fast-track Approvals Act 2024) if:

    a) The Approval Holder breaches any of the conditions of this Approval.

    b) In the Director-General's opinion, the exercise of this Approval has caused, or is likely to cause, any unforeseen adverse effects on lizards.

    If the Director-General intends to revoke this Approval in whole or in part, the Director- General will give the Approval Holder such prior notice as the Director-General considers reasonable and necessary in the circumstances.

Costs

18. The Approval Holder must pay the Department of Conservation's standard charge-out rates for any staff time and mileage required to monitor compliance with this Approval and to investigate any alleged breaches of the terms and conditions of it.

Liabilities

19. The approved earthworks and vegetation works contractor agrees to exercise the Approval at its own risk and releases, to the full extent permitted by law, the Director-General and the Director-General's employees and agents from all claims and demands of any kind and from all liability which may arise in respect of any accident, damage, or injury occurring to any person or property arising from the exercise of the Approval.

Compliance with the Director-General's Notices and Directions

20. The Approval Holder must comply with all statutes, bylaws, and regulations, and all notices, directions, and requisitions of the Director-General of Conservation and any competent authority relating to the exercise of the Approval.

Employees, Contractors or Agents

21. The Approval Holder is responsible for the acts and omissions of its employees, contractors, and

agents.

22. The Approval Holder is liable under this Approval for any breach of its terms by employees, contractors, or agents, as if the breach were committed by the Approval Holder.

23. Where obligations bind more than one person, those obligations bind those persons jointly and separately.