

5 June 2026

Expert Panel for Haldon Solar
C/- Fast-track Team
Environmental Protection Agency

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Kia ora

**FTAA 2508-1097 HALDON SOLAR FARM – PANEL MINUTE #18 -
RESPONSE FROM DIRECTOR-GENERAL OF CONSERVATION**

In its Minute 18, the Expert Panel has requested the views of the Department of Conservation on two matters relating to funding for kakī / black stilt recovery. This letter responds to that request.

Background

The proposed Haldon Solar Farm development would create a risk of collisions and fatalities for avifauna, including for a range of Threatened and At-Risk species known to use or fly over the development site. This includes the Nationally Critical kakī / Black stilt, which has a current population of only 148 birds and is the subject of a major breeding and recovery programme being undertaken by DOC. The Panel has indicated a means of alleviating adverse effects on kakī would be a substantial, upfront and secured funding commitment from the applicant, directed to measures reasonably expected to generate tangible, population-level benefits commensurate with the residual collision risks to kakī moving across the site.

The Panel is seeking DOC's views in terms of the practical steps that could be taken with such funding, and the likely benefits in terms of population improvements, and the likely costs of each element (on an annual basis). Given the limited time available, the Panel does not seek precision, but rather a broad scale consideration of options and cost.

The Panel also seeks DOC's views on the willingness of DOC to be involved in the implementation of any of the above practical steps.

It is important context that the cost of protecting and increasing the population of a species like kakī are substantial – currently in the order of a half-million dollars per year for the breeding programme, and a third- to half-million dollars per year for each area of catchment-scale predator and habitat management to support survival and recovery in the wild. In the medium to long term, ensuring the species' survival (especially with the scale of potential solar development in the Mackenzie Basin) may require even more major works to protect the species in current locations or establish new populations elsewhere.

We also note that a critical component of understanding risk to the species from solar farm development is a Population Viability Analysis, but despite being requested this has not

been provided by either of the current FTAA applicants. DOC's view is that the absence of this information means a strictly precautionary approach to risk is required.

DOC's previous approach on these issues

Similar issues have arisen for The Point Solar Farm, which is another large solar farm proposal close to the Haldon site, for which DOC and other parties have also raised concerns about avifauna collision risk. In that case the applicant has proposed a \$1m upfront contribution, under an approach outlined in section 5.1.b) of its response to RFI 2 dated 23 February 2026 and section 3.3 of its response to RFI 5 dated 29 May 2026. That approach is summarised in Attachment 1, which outlines the intended benefits and suggests draft conditions to implement the compensation framework¹.

DOC had worked with Far North Solar Farms (FNSF) to develop that proposal for avifauna compensation that addresses some critical knowledge gaps and effects relating to the loss of habitat and creation of collision risk. The avifauna experimental mitigation measures listed in the applicant's Avifauna Management Plan may help respond to collision risk, but by no means guarantee it. If collisions do occur then additional response measures would still be needed, which could feasibly be covered by a framework of monitoring, reporting, response triggers and review conditions.

Practical steps for Haldon Solar Farm

DOC considers that a similar approach could be taken if upfront funding is provided to respond to avifauna collision risk for the Haldon Solar Farm. DOC's view is that a similar level of funding to The Point would be appropriate - the exposure to collision risk for kakī is possibly lower at the Haldon site than at The Point, but given the low numbers of birds the consequences of collision would be the same, and there will be more loss of avifauna habitat generally at Haldon.

DOC understands that Lodestone may prefer to provide funding in tranches. DOC's preference would be for a fully upfront approach, as that would be more effective and more commensurate with the costs of species management. However, if the Panel was minded to provide for subsequent tranches, we consider it is important that this is not seen as absolving responsibility for future avifauna collisions – if ongoing collisions occur, they will need to be assessed and responded to on the merits at the time, which could well require more than just additional funding.

The practical steps would (at least initially) be the same measures as outlined for The Point – predator control, transmitter tracking, wetland enhancement and instream invertebrate research. DOC has previously assessed these as the most worthwhile 'next available' measures to respond to collision risk, and this applies equally to a similar risk in the same vicinity affecting the same population of birds. If more funding became available (e.g. if multiple solar farms proceed), further options would include expanding predator control or habitat improvements to other locations such as Aoraki or the Dobson Valley, adopting new predator control technology, and undertaking further research initiatives.

¹ The proposed conditions were based on conditions to compensate for residual effects on long-tailed bats, agreed by DOC and Contact Energy for their Southland Wind Farm under the Covid-19 Fast-track process, and subsequently adopted by the Expert Panel for the same project in its decision to grant approval under the Fast Track Approvals Act 2025. See [FTAA-2508-1095], Decision, Appendix B, Conditions EC75 – EC78. A similar approach has also been applied for the FTAA grant of consents for Waihi North.

A key point of the suggested approach is a requirement for an Avifauna Compensation Strategy, to reflect the fact that it is as yet unknown which of the various solar farm proposals in the Mackenzie Basin will eventually proceed, or when. While initial measures and costs can be specified, there needs to be an ability to update them if required. For example, if the first project to proceed funded the kakī transmitter project, there would be no point in the next solar farm repeating that, so funding could be reallocated to the next most worthwhile project (which could be informed by the results of the transmitter project). This approach also recognises that the current evaluation of options and costs can only be at a high level given the constraints of the Fast-track process – an Avifauna Compensation Strategy will allow measures to be further refined, and updated over time, as appropriate. It will also allow future measures to be informed by updates to DOC's long-term planning for kakī recovery.

Although the Panel has stated it would not be averse to an annual funding arrangement, DOC's preference would be for an up-front payment. A larger one-off payment is more likely to make a material difference for the species than smaller ongoing amounts – it can enable larger interventions (e.g. landscape scale predator control or major research projects), and the benefits gained (e.g. predator knock-down or new knowledge) can then help support future species management. The transmitter tracking project in particular would not be able to be spread over many years.

DOC would also prefer that compensation measures not be limited to kakī. While we understand the Panel's concern that kakī are the most vulnerable species, it can be more effective and efficient to manage activities such as predator control to benefit a range of species. There also remains a risk that collisions could affect other Threatened species such as the nationally endangered tarapirohe/black-fronted tern, and in that case, it would be preferable that the effects management measures in the consent, including research, are directly able to respond. Tarapirohe typically have several small nesting colonies in the Takapō River, and the lower river and adjoining land would be part of their foraging habitat. Additionally, transmitter studies show that non-incubating birds from pairs nesting in the large colony in the upper Ōhau River travel down to the Takapō River delta to roost during the night. This places them in close proximity to the Haldon site.

Importantly, this proposed approach is relatively neutral on the location of the solar farm, being more focussed on the affected avifauna populations, so can potentially be used as a consistent approach across other Mackenzie solar farm proposals as well.

DOC willingness to be involved in implementation

I confirm that DOC is willing to be involved in the implementation. Funding is able to be held by DOC under a trust account arrangement, with the funds retained and ring-fenced for the prescribed purpose. DOC is neutral on who then undertakes the measures – it could be any combination of DOC, contractors, mana whenua and/or community partners that would best deliver the relevant measures.

Framework for compensation measures

We do not know how the actual collision risk will play out over time. DOC certainly hopes that collisions will be rare, such that no further action is warranted. However, there is a material risk that collisions could be at significant levels, which would risk population-level effects beyond what the compensation would address. DOC's view is therefore that compensation measures would need to sit within a suite of conditions with monitoring, reporting, response triggers, review etc, which we understand is what is now proposed by Lodestone but may need to be refined in conjunction with the above compensation framework.

We hope the Panel finds these comments helpful. If you have any questions regarding them, please contact Murray Brass on [REDACTED] or [REDACTED]

Yours sincerely



Jenni Fitzgerald
Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Attachment 1

The Point Solar Farm avifauna compensation options as at 23 Feb 2026

1. Predator control

DOC currently undertakes predator control in the Godley and Cass River areas, but the funding for this through the International Visitor Levy is only confirmed until June 2028. This proposal would fund continuation of that work to retain the gains made. Protection under this programme is targeted at kakī, black-fronted tern, wrybill, banded dotterel and black-billed gulls, and is particularly designed to protect kakī nesting sites and improve survival of released captive-reared kakī into the area.

Cost estimate: \$595,000 over 7 years from July 2028.

Outcome: maintain kakī and black-fronted tern populations in the Godley and Cass Rivers, and provide conservation co-benefits for other species in those areas.

2. Transmitter project

One of the biggest issues for kakī is the low survival of released birds in the 1-2 year age range, which leads to reduced recruitment to the adult breeding population. This project would provide a dedicated ranger position to lead transmitter tracking work, with the aim being to improve understanding of the movements of birds post-release and causes of decline of 1-2 year old birds. As part of this, the tracking would also help understand kakī movements in relation to solar farms.

Cost estimate \$405,000 spread over a 3-year research project.

Outcome: Improved understanding of the causes kakī losses at 1-2 years, to allow future work to better target those causes and improve survival to breeding. It would also provide better understanding of exposure to solar farm collision risk.

3. Wetland enhancement

Wetland habitat in the Mackenzie Basin continues to be lost. Wetlands are important to all of the threatened bird species in the Basin, and for kakī are particularly important during flood events which are becoming more frequent. The aim of this project is to enhance and create more wetland habitat for threatened bird species. This would include Dead Horse swamp pond development for improved habitat in the Tasman Valley and regular maintenance of weirs and ponds in Mailbox and Inlet and Micks Lagoon.

Cost estimate: \$35,000 over 3 years (with scope to expand or extend this if more funding was available)

Outcome: Improvement of wetland habitat for threatened bird species, and improved resilience for kakī. Will also provide compensation for loss of habitat to solar arrays.

4. Instream invertebrate research

Understand instream invertebrate abundance over the calendar year to better understand food availability for birds, including kakī, at various times of the year. This may mean adjustments to release timeframes and hopefully better survival post release.

Cost estimate: \$15,000 over 1 year as a specific project.

Outcome: Improved management of kakī release and survival.

Suggested consent conditions to provide for this:

1. The Consent Holder shall ensure that an Avifauna Compensation Strategy (ACS) is prepared and undertaken in conjunction with the Department of Conservation before construction of the solar farm commences.
2. The objective of the ACS is to improve the survival and resilience of threatened species of birds which use or traverse the solar farm site (including kakī / black stilt, matuku-hūrepo / Australasian bittern and kōtuku / white heron and tarapirohe / Black-fronted tern) including by:
 - a) Targeting predators within the range of the bird species within the Mackenzie Basin, through trapping and other methods in order to increase birds' likelihood of survival;
 - b) Improving key habitat within the range of the bird species within the Mackenzie Basin;
 - c) Undertaking research which will support more effective management of the bird species.
3. *(Timing and certification requirements to align with other ecology conditions, and to provide for review of the strategy - eg if research indicates ways of improving effectiveness)*
4. The Consent Holder's financial contribution to the ACS shall comprise a payment to the Department of Conservation of \$1,000,000 CPI (all groups) adjusted from 1st July 2026 to be used for implementation of the ACS, payable on or before the first day of commencement of the construction of the solar farm.

These conditions are based on conditions agreed by DOC for the proposed Contact Energy Southland Wind Farm under Covid-19 Fast-track, and structured to operate via a one-off payment up front.

In terms of the FTAA, the recent decision for Waihi North includes a similar approach (joint Hauraki District and Waikato Region consents, conditions C30-C42). However, that is structured as an ongoing arrangement, so is more complex.

Note, as per DOC s53 comments, the ACS would still need to sit within a standard framework of management, monitoring, reporting, review etc, along the lines of the FNSF 18 Feb condition set.