| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| ***1.*** *The Vegetation Values Report (B.13) and the Assessment of Ecological Effects (B.08) are not consistent in the values that they assign to the various vegetation communities. Please either:*<br>*a. Update these reports to be consistent with each other; or*<br>*b. Update the Report B.13 to include – for every instance of disagreement – the reason why RMA Ecology disagree with the Alliance Ecology values assessment; and*<br>*c. Following the* | **MB/GU**<br><br>Report B.08 values assessment accords with Ecological Impact Assessment Guidelines (EIANZ, 2018) (herein EcIAG)) and supersedes values assessments in vegetation report.<br>As is stated in report B.13, a slightly different method to the EIANZ classification was used for the vegetation values assessment. There is no need to update report B.13 as it is accurate. | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| *update in part (b), identify which of the reports (B.08 or B.13) represents the opinion of MGL as to the values associated with each vegetation community; and*<br>*d. Update any other reports or management plans that rely on these values in prescribing recommended mitigation measures.* | | | |
| ***2**. Please explain the application of the 'representativeness' criteria in the assigning of ecological value to vegetation communities. It appears that the* | **MB/GU**<br>Representativeness criteria for each habitat is assessed in accordance with the EcIAG representativeness assessment as set out in Table 4 of the EcIAG. We consider the application of the representative criteria in assessing ecological value to be appropriate and that an assessment of representativeness in broad terms should primarily be benchmarked against | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| *extent of a vegetation community elsewhere in the ecological district, and pre-human conditions, have been taken into account in determining representativeness. It is the opinion of e3 that this will result in the underestimation of the representativeness criteria and hence potential underestimation of overall value. Please refer to s3.1.1 of the e3 memorandum.* | the best available examples of this habitat type coupled with its ecological integrity, e.g. indigenous dominance and the percentage of species present that should be present. It is the opinion of the report authors that assessing an exotic dominated vegetation community that is in a state of decline as highly representative is likely to over-state representativeness. Moreover, we note that differences in opinion on the matter or representativeness do not necessarily change the assigned ecological value as implied by E3. For example, we have assessed mixed depleted herbfield (cushionfield) and grassland as having 'Very High' ecological value (the highest ecological value category), despite being assigned a representative value of 'Moderate' (the second highest of the 4 categories) for representativeness. | | |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| ***3.*** *Please explain how the proportionate loss percentages have been calculated in Table 16 of Report B.08.* | **MB/GU**<br>The proportionate loss in Table 16 is based on the percentage of loss in the direct disturbance footprint (DDF) relative to that available within the 5,386 ha Ecological Study Area (ESA) which is termed the Surrounding Landscape (SL). This is stated in the executive summary and in Section 1.2 of the main report. Notably the surrounding landscape extends well beyond the 5,386 ha ESA, so the ESA constitutes the immediate landscape and the proportional effect relative to the broader surrounding landscape would be considerably less. | Response provided in meeting (21/01/26) | No further response |
| ***4.*** *Please provide explanation to justify the 'negligible' proportional loss of the three types of wetlands considered in Table 16 of Report B.08.* | **MB/GU**<br>In the context of the assessment, the negligible proportional loss stated in Table 16 of Report B.O8 relates to the expected proportional loss in the Ecological District. However, in further considering this, it is more appropriate to assign the proportional loss of wetlands in the Dunstan Ecological District as low and the proportional loss in the Central Otago Eco-Region as negligible noting that the Central Otago Eco-region is the smallest mainland eco-region and similar in size to most Ecological Districts. | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| | This revision is immaterial as it does not elevate the assigned magnitude of effects, which is assessed as 'moderate' for all three wetland types, and in turn it does not change the assessed level of residual effects or the stated outcomes. Specifically, we consider that there will be a net loss of gully/fen and seepage wetlands that, beyond avoidance, cannot be addressed through effects management and we consider there to be a net gain for swamp/marsh wetlands through the creation of 7.5 ha of swamp/marsh habitat and as indicated via the application of a Biodiversity Offset Accounting Model. | | |
| ***5.*** *Please explain the reasoning behind the proposed numbers of plants to be planted for species, as set out in Table 15 of Report B.08.* | **MB**<br>The number of plants proposed for planting for each notable species at rehabilitation sites, which Table 15 relates to corelates with the number of plants likely needed to achieve positive outcomes (i.e. more plants of each notable species are established in the ecological rehabilitation sites than are impacted) and therefore correlates with but exceeds the minimum number of plants | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| | impacted for each species. Please see the magnitude of residual effects Table (Table 17) which makes this clearer as it provides information on the minimum no of plants impacted for each notable species versus the minimum number of plants to be established within the ecological rehabilitation sites.<br>The same notable species to be planted in the rehabilitation sites are also proposed for planted across the offset/compensation sites so for impacted plants that can be re-established via planting, the total number of plants planted for each notable species is significantly higher than that stated in Table 15. | | |
| ***6.*** *With reference to section 3.1.1 (bullet points on page 11) of the e3 memorandum, please provide justification to support the assumptions that have been made regarding the* | **MB/GU**<br>We have not made any assumptions regarding the proportional effect of the proposal on the populations of notable flora in the Ecological District because it is not feasible to do so. This is due to:<br>• the lack of available information, particularly on private landholdings;<br>• the scale of surveys required to determine the spatial distribution and relative abundance of each notable species; and/or | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| *proportional effect of the proposal on the populations of notable flora in the Ecological District.* | • landowner access constraints.<br>Rather, our assessment of the proportional effect has defaulted to a coarse assessment of the proportional magnitude of effect on the known population, which is based on desktop assessment of available databases and information, such as naturalist and DOC threat classification assessments.<br>To our knowledge there has never been an Ecological Assessment of Effects Report that has included and been informed by notable plant surveys across an entire Ecological District. We would be interested to find out from E3 if they have completed or are aware of any such surveys for the purpose of an assessment of effects. | | |
| ***7.*** *Please clarify whether the level of residual adverse effect on vegetation and plant species is relative to the direct disturbance footprint, or the ecological study area. Tables 21* | **MB**<br>The level of residual adverse effects on terrestrial vegetation and plant species is relative to the DDF because this is where direct impacts occur, noting that indirect effects such as noise, dust and light, while relatively minor, will extend beyond the Direct Disturbance Footprint (DDF).<br>The level of residual effects on wetlands is relative to the DDF and the Ecological Study Area | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| *and 22 of Report B.08 appear to be inconsistent on this point.* | (ESA) because wetlands will be directly impacted both within the DDF and within the ESA (specifically within the 142 ha DDZ) via drawdown as indicated via Section 3.2 of the Wetland Assessment Report. | | |
| ***8**. Please explain how the rehabilitation approach set out in Table 15 of Report B.08 equates with the current population size or areal extent of the species to be rehabilitated at the site. This information is necessary to understand whether the proposal is likely to result in a net loss or net gain for each species.* | **MB/GU/RS**<br>This question seems very similar but broader to question 5. Please see our response above as in answering question 5 we have also considered this question.<br>Also in response to the E3 statement pertaining to net gain, and as set out in B.08, it is key to note that we are not claiming net gain for any notable flora on the basis that:<br>• we cannot feasibly quantify the number of plants of each species impacted<br>• while we quantify the minimum number of 'notable' plants and areas of specific ecosystems that will be established within the DDF, Mine Regeneration Zone and Ardgour Restoration Area, we cannot feasibly quantify or accurately predict the number of plants that will establish and be present within the rehabilitation or | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| | offset/compensation sites after 35 years strictly because of proposed conservation measures.<br>• We have not applied a Biodiversity Offset Accounting Model for reasons above.<br>Rather for those notable species that can feasibly be planted and/or are expected to respond positively to other compensation actions, such as the elimination or control of browsing pressure from introduced mammalian pests, we have assessed outcomes as net positive. In other words, we consider benefits to outweigh impacts based on the quantum and type of compensation versus impacts coupled with professional opinion | | |
| ***9.*** *Please clarify how effects on wetlands present in the Dewatering Drawdown Zone have been assessed in the application and whether effect on these wetlands are addressed via the* | **MB/GU**<br>Gully Fen and seepage wetlands within the dewatering zone are considered to be lost and this loss has been factored into the assessment of ecological effects as is stated throughout the report. The confusion is valid, however, as Table 26 incorrectly states otherwise and this table requires updating accordingly.<br>Drawdown effects (as well as direct loss) of these wetlands are not and cannot be feasibly | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| *proposed effects management package. Further justification for this question can be found in section 2.2 of the e3 memorandum.* | addressed in a like for like manner via effects management as this would require the re-creation of wetland hydrology. This is why we have claimed net loss outcomes for these wetland types.<br>Conversely, drawdown effects on swamp/marsh wetlands can be minimised by augmenting flows to affected wetlands as detailed in the Mine Impacted Water Management Plan and residual effects can be addressed through the creation of 7.5 ha of swamp/marsh wetland as part of the ecological rehabilitation package. Details on this are set out in Report B.12 (Assessment of Ecological Effects) and in G.07A (Landscape and Ecological Rehabilitation Plan). | | |
| ***10.*** *Please provide evidence to support the classification of several onsite ponds as constructed wetlands i.e. not natural inland wetlands.* | **GU**<br>The onsite ponds are not considered to be wetlands – even if they support wetland vegetation, because they have constructed bunds and in some cases the bed of the pond has been earthworked to create storage capacity. These ponds clearly meet the definition in NPS-FM Clause 3.21 (1) for natural inland wetlands part (c) where these ponds are deliberately constructed waterbodies, and | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| | wetland vegetation has established since the construction of that waterbody. Therefore, wetlands associated with these ponds are not natural inland wetlands and have been excluded from our analysis. The ponds are still actively used as stock water sources. | | |
| ***11.*** *Please explain whether a corrective factor is required to account for the fact that not all wetland species surveys were done in springtime.* | **GU**<br>No corrective factor was applied nor was it considered necessary on the grounds that these wetlands were exotic-dominated, and all native species present where able to be identified year round – It would be useful for E3 to clarify which species they consider to be likely or possibly present that would be undetectable or unable to be identified outside of spring | Response provided in meeting (21/01/26) | No further response |
| ***12.*** *Please explain why no invertebrate or lizard surveys of wetlands were undertaken and what uncertainty this introduces into the assigning of ecological value, level of effect, and* | **GU**/**MB**/**KB**<br>**Invertebrates (KB)**<br>Wetlands were not specifically targeted as sampling units within the invertebrate study design. However, wetland habitats and their associated invertebrate fauna were captured through several survey methods:<br>1. **Integrated monitoring sites** detected wetland-specific invertebrate species, indicating these habitats were within the | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| *management of residual effects.* | sampling catchment of our IM station capture devices.<br>2. **High-value transects** traversed wetland areas, with hand collection of invertebrates conducted within these wetland habitats during transect surveys.<br>3. **eDNA sampling** was obtained from stomach contents of feral pigs shot in wetland areas. While these samples were collected outside the ESA boundary, they provided additional records of invertebrate species utilising wetland habitats within the broader study area.<br>While wetlands were not delineated as discrete sampling strata, the survey design captured invertebrate assemblages associated with these habitats through multiple sampling methodologies, providing representation of the wetland invertebrate fauna present.<br>Wetland invertebrates were covered off in part in report B.17 Waterways Consulting Assessment of Effects on Aquatic Habitat) Freshwater Ecology Report.<br>While other invertebrate surveys did not specifically target wetlands a) wetland obligate | | |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| | species were captured in light traps, b) the transects included (the tiny) wetlands and (narrow) streams, areas targeted as part of high value invertebrate habitat (due to diversity and structure of adjacent vegetation). There was hand collection done across wetlands (picking up a significant obligate moth).<br>**Lizards (GU/MB)**<br>Wetlands with standing water are not habitat for native lizards. Wetlands that are ephemeral and which provide dry/ moist land and adequate plant cover are potential habitat – and these were sampled using manual search, ACOs, pitfalls and gees minnow traps. The target species in these wetter areas were Lake skink, cryptic skink and tussock skink. Sampling of these ephemeral wetland and wetland fringe areas was deliberate and targeted the best examples where lizards could be present (while acknowledging that all were massively impacted by stock and were at most poor habitat for the likes of lake skink). We are confident that wetland areas have been adequately sampled. | | |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| ***13.*** *Table 38 of Report B.12 appears to indicate the presence of 1,625 $m^2$ of wetland at altitudes greater than 800 m asl. In accordance with Policy 10.4.1A of the Regional Plan: Water for Otago, any wetland that is located at an altitude higher than 800 m asl is a regionally significant wetland. Please explain whether this changes the overall level of ecological value assigned to these wetlands and update any reports and management plans accordingly.* | **MB/GU**<br>The ecological condition and value of wetlands above 800m were generally higher than wetlands below 800m with wetlands above 800m as stated in Report B.15a.<br>The values of wetlands were taken on their ecological merits – as should expected – rather than attempting to incorporate a planning designation for policy status of those above 800 m asl. The approach that we have taken is appropriate as the EIANZ EciAG method requires the assessment of ecological value by habitat type, rather than being influence by policy.<br>Even if the >800 m asl policy was somehow applied, doing so would not change the overall ecological value assigned to each wetland habitat type. That is because the higher values associated with wetlands > 800m asl (which equated to approx. 5% of the wetland impacted) is already factored into the assessment of ecological value for each habitat type and have proportionally elevated the overall assessment of value for each wetland type. Likewise, the lower values of some of the entirely exotic-dominated wetlands < 800m asl have been | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| | factored in and have proportionally lowered the overall assessment of value for each habitat type.<br>Given the above, there are no changes to our level of effects assessment or our conclusion that there are moderate residual effects on gully fen and seepage wetlands that cannot be feasibly or demonstrably minimised, remediated, offset or compensated for, i.e. we expect net loss outcomes for these wetland types. In contrast, we expect net gain outcomes for swamp/marsh wetlands for reasons stated above. | | |
| ***14**. Please provide evidence, such as trials or case studies, to support the assumed success of the proposed translocation of wetland and establishment of new wetlands. These activities are relied on in the ecological* | **RS**<br>Success of the proposed translocation of wetlands using the direct transfer technique is based on case studies from mine sites that have involved plants with similar stature and rooting depths, for example red-tussock dominated wetlands at Stockon Mine, and mines where wetlands have been established on engineered landforms. The latter include wetlands on gold mine tailings dams at Reefton (planted 25,000 nursery-raised wetland seedings in 2020 Fossickers Lake Track: Victoria Forest Park, West | Response provided in meeting (21/01/26) | **RS**<br>We have deleted the sentence '*In addition, the bases of constructed wetlands will be installed with maximum permeability specified by hydrologist and tested before root zone placement (ref)*' |

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| *mitigation / offsetting / compensation package, but insufficient detail has been provided to understand how these activities will be undertaken, and how their success will be assured* | Coast region) and at Waihi (naturally-established wetlands have developed since tailings disposal was halted in 2005), and engineered overburden landforms at Stockton (where direct transfer red tussock wetland has been established for over 10 years, and where tarns have been created on overburden dumps). Despite these three mine sites having annual rainfall surplus over evapotranspiration, the methods used are transferable. Adaptive management can be used at the Bendigo – Ophir site to tailor these wetland rehabilitation methods to this site as a) substantial wetlands are created in the first years of mining not just at the end of mine life and b) a variety of methods are available to establish suitable hydrology's and plants. Although the above mines do not have readily-accessible reports, photos of these sites are in the links provided.<br>Establishment and success of wetland establishment is underpinned by conservation of wetland plants and soils during stripping, placement of suitable root zones, control of water tables (water inflows and losses), large-scale nursery-plant propagation from seed and | | The reason for deleting is that there is no reference available and no condition confirmed |

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| | divisions (providing flexibility) as well as from translocated wetlands and post-establishment control of competing plants (weeds). Each stage is proposed to be monitored with annual reporting of wetland plant species, areas and soil volumes.<br>An adaptive approach is provided by the ability to raise water tables in most wetlands through a combination of a) managing height of outflows (Engineering Ecology Limited B21 17.6 'post-closure spillway design and surface drainage') and/or b) supplementing water inflows and/or c) manipulated depth of root zone backfill and/or d) manipulating gradients of areas receiving translocated wetland. This range of options to deliver and manipulate wetland hydrology helps assure successful rehabilitation in combination with exclusion of cattle in perpetuity (which have altered hydrology of lower existing wetlands) and removal of pest plants such as willows that could impact hydrology in perpetuity. | | |

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| ***15**. Please explain how erosion and sediment control measures will be implemented around wetlands. It appears that wetlands are not considered within the Erosion and Sediment Control Management Plan (Report G.14).* | Response to Q15 has been provided in the response to ORC on geotechnical engineering, surface water, erosion and sediment control by EGL. | | |
| ***16.** Please explain why a standalone wetland management plan was not considered necessary.* | **MB/GU**<br>A standalone wetland management plan was not considered necessary because:<br>• effects minimisation on all wetlands is limited to erosion and sediment control (best placed in an erosion and sediment control plan) flow augmentation for swamp/marsh wetlands (which is best placed in the Mine Impacted Water Management Plan),<br>• effects rehabilitation is limited to re-creation of swamp/marsh wetland which is best placed in the Landscape and Ecology Management Plan. | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| | • Residual effects via wetland offsetting or compensation is not claimed due to technical/feasible constraints of re-creating hydrology<br>As such a standalone wetland management plan would be largely redundant. | | |
| ***Lizards*** | | | |
| ***17****. Please explain why not all vegetation sites and altitudes were sampled for lizards and why little survey effort appears to have utilised trapping as a method. Please then explain what uncertainty this introduces into the assessment and how this has been taken into account in the subsequent management actions.* | **GU/MB**<br>This lizard survey is the most thorough that I have been involved with in 32 years of being a herpetologist. Survey techniques were tailored for species and habitat qualities. Where habitat was very simplistic (e.g. road or managed pasture) only a few survey techniques were applied because it is unreasonable to assume that lake skink, Otago skink, or jewelled gecko could live in a ploughed field. For environments other than valley bottoms, screes or wetland areas, passive techniques were applied – manual search, basking search, ACOs – as these are accepted techniques that are most effective for the species that could live there. Using trapping (pitfalls or funnels traps) would not add rigour to the sampling, but would add risk by | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| | way of potentially catching mice with lizards and increasing lizard mortality.<br>In contrast, we did throw every technique at areas where potentially difficult to find lizards could be present – screes, valley bottoms and wet areas where vegetation and habitat is complex and dense, and where manual search and visual observation might miss a species.<br>The surveying applied was comprehensive, diverse and appropriate for the individual habitats and species expected in the various parts of the site. There is no uncertainty associated with the results.<br>While it is extremely unlikely that a species of lizard exists on the site that we have not detected, we also note that the Lizard Management Plan lays out methods for the salvage of native lizards, and that the application of those methods will detect, salvage and prevent from harm any other lizards that are present. | | |

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| ***18**. Please indicate whether any further lizard surveys have been undertaken since the ecological reports were written, or whether any further surveys are planned. If such surveys have occurred, please provide the survey data with an explanation as to how this informs species presence and population estimates.* | **GU/MB**<br>No further survey work is planned nor deemed necessary to inform our assessment of effects or proposed effects management for lizards | Response provided in meeting (21/01/26) | No further response |
| ***19**. Please explain why it is appropriate to assign a 'low' ecological value to a location that provides habitat to an 'at risk' species.* | **GU/MB**<br>The assignment of low habitat value in some locations (and medium or high in other locations) is a relative term and it is entirely appropriate and necessary to assign relative habitat value for a given species to be able to assess effects and identify priority habitats or | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| | sites for effects avoidance and effects management.<br>For context, this assignment of relative value provided in report B.15A to assist with the development of the lizard management plan and was not used in the B.08A report to determine the level of residual effects or expected biodiversity outcomes for lizards. | | |
| ***20**. Please explain the rationale used to estimate lizard population sizes, including how survey data has informed this estimate* | **GU/MB**<br>As explicitly stated at Section 3.7.4 of Report B.15A, the estimated lizard population sizes 'coarse' and derived from:<br>• Survey data coupled with site knowledge<br>• Context from other projects including correlations between quantitative lizard data to inform an assessment of effects and the actual number of lizards captured and estimate through subsequent salvage operations.<br>A coarse estimate is required to inform Schedule 7 Wildlife Act Approvals in accordance with the Fast Track legislation. | Response provided in meeting (21/01/26) | No further response |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| ***21**. Please explain why the loss of 607 ha of lizard habitat within the direct disturbance footprint is considered 'temporary'. It is unclear what proportion of this habitat would be recreated, over what timeframe, and how long it would take for the habitat to be able to sustain the current population size.* | **MB /GU**<br>Report B.08A does not state that the loss of lizard habitat within the direct disturbance footprint is considered temporary. That said, lizard habitat loss is considered mostly temporary as most of the available habitat within the DDF is proposed for ecological rehabilitation that, in the long term, is expected to be of higher quality for lizards than what is currently present. However, there will be permanent loss of lizard habitat in areas that cannot be feasibly rehabilitated, most notably the proposed pit lakes, the majority of pit walls and the 7.5 ha of area proposed for swamp/march habitat.<br>Report B.15A at section 5.0 states that there will be a temporary loss of lizard habitat across ca. 610 ha. That is in error. The level of temporary loss should reflect the area proposed for ecological rehabilitation (as is stated in the paragraph above).<br>The temporary nature of habitat and population loss across the habitat under the future habitation area forms part of the basis for the offset calculations in Appendix 3 to Report B.08A where 480 ha of lizard habitat will be restored of | Explanation understood. Confirming that 480 ha of the 607ha will be re-instated to the same if not greater quality, and sufficient to support the lizard species present to current, if not higher, carrying capacity? | **MB**<br>Yes - confirming e3s understanding is correct |

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| | the 607 ha that will be impacted. The offset models associated with lizards in the rehabilitation areas assume that lizards will return to their pre-development population density by Year 35 following impact, which in our opinion is a temporary loss of values within that exact footprint, rather than a permanent loss for all time. | | |
| **22**. Please explain why the magnitude of residual effect on Tussock Skink has been assessed as moderate in Report B.08 Table 19. | **MB /GU**<br>A moderate residual effects has been assigned for tussock skink, Kawarau gecko and McCann's skink not just tussock skink. The justification for assignment of a moderate magnitude of residual effect for all three lizard species is detailed in Table 19 of B.08A so please refer to that Table. | Explanation understood. | No further response |

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| **23**. Please explain how the recreation of lizard habitat through the rehabilitation of the direct disturbance footprint will contribute to a "considerable reduction in the severity of effect". Your answer should explain:<br>a. how specific proposed measures, such as the creation of 480-500 rock stacks, is equivalent to the current habitat, and quantify (to the extent possible) the benefits of rock stacks to the three species of lizard identified as present: | **MB /GU**<br>While we state that there will be a 'considerable reduction in the severity of effect' and stand by this statement, this is in the context of concluding that there will still be a high level of residual effect on the two nationally At Risk species (and a low effect on the non-threatened species).<br>In that context, we stand by the view that the reduction in severity of effect associated with the 480 ha of ecological rehabilitation of lizard habitat (including the addition of of 480-500 rock stacks) constitutes a substantive reduction in the severity of effects.<br>As set out in Report B.15A there are relatively few large rocky outcrops in the DDF. The additional of 480-500 rock stacks and scattered rock complexes as part of the ecological rehabilitation will increase the availability of rock habitat in the existing footprint.<br>These rock-based habitats in the form of rocky outcrops rock stacks or scattered rock complexes are high value habitat for all species of lizards present as indicated by survey methods typically employed by experienced | Explanation understood. e3s agree that the creation of the rock stacks and other proposed mitigation is positive and appropriate. However, the information provided has not been able to quantify the impact of these measures. This supports the residual MOE being high as they have said, and the requirement for additional compensation being appropriate. e3s note that this High value may be misaligned with Q22 and the Moderate magnitude of residual effect, clarification is sought. | **MB /GU**<br>Beyond quantifying the type and amount of mitigation proposed, it is difficult to quantify the benefits of mitigation measures beyond stating that the ecological mitigation efforts are substantive and there is nothing additional that can be done without compromising the broader mitigation efforts for other biodiversity values, e.g. by the addition of more rockpiles would reduce the areal extent of vegetation and associated biodiversity values. To address the second part of the E3 response, the MG initial response does not refer to the Magnitude of Effect as |

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| b. the source populations, timeframes for reintroduction, and whether reintroduction will be assisted or natural | herpetologists, the results from this survey from other relevant studies and the experience of the project herpetologists. Further to this, report G.07b (the Landscape and Ecological Rehabilitation Plan), Part B Appendices, Appendix C describes the methodologies for rehabilitation of lizard habitats. This includes Table 1 'Plant species for lizard habitat to be established with rock stacks and rubble pits' which identifies the provision: shelter, fruit, pollen/nectar and/or invertebrates (the plant list is repeated in Appendix E4 Plant species for lizard rock stacks and rubble pits in DDF).<br>No salvaged lizards will be relocated into the ecological rehabilitation sites as these rehabilitation sites will not be ready to receive salvaged lizards. Rather source populations will stem from lizards dispersing/colonising from the adjacent Mine Regeneration Zone, which will be subject to habitat restoration and enhancement measures. Timing of ecological rehabilitation (and therefore lizard colonisation/dispersal) will vary and is detailed in the ecological rehabilitation plan. | | High, rather it refers to the Level of Residual Effect as High for the two nationally At Risk species, i.e. (High value x Moderate Magnitude of Effect = High Level of Residual Effect). |

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| **24**. Please explain why the proposed pest control excludes mice, and what impact this is likely to have on the success of any reintroduced lizard species. | **MB /GU/KB**<br>The proposed pest control excludes mice because mice cannot be effectively and reliably controlled to low densities at the scale of the salvaged lizards release site (which will include the release of at salvaged lizards across the 1,263 ha Ardgour Restoration Area.<br>The inability to control mice across the Ardgour Restoration Area is assumed to compromise the success of the salvage and relocation operation. We note also that even if mice control was feasible, the success of relocations is by no means guaranteed. Correspondingly, in the absence of evidence to the contrary, we have appropriately and conservatively assumed there will be no reduction in the severity of effect associated with lizard salvage and relocation operations.<br>This is despite embarking on the largest lizard relocation operation undertaken on any project to date with a commitment to salvage at least 102,000 lizards and substantive habitat restoration and enhancement measures at the proposed relocation site as well as the establishment of two mammalian pest exclusion | As per the above this raises uncertainty around the possible success of rehabilitation.<br>Predator control of mice in Mokomoko fenced sanctuary is an example of success in sanctuary where lizard relocation has been successful. However, understood lizard release sites in this location are all outside the fenced sanctuaries where mouse predator control will be more difficult, yet still helpful.<br>Was collaboration with Scientists working on larger scale mouse control considered? DOC herpetologist is working on this including trials. Further, what consideration has been given to the potential effect on mice populations at the release sites due to predator control of higher predator guilds? | **MB/KB/GU**<br>We agree that it raises uncertainty about the possible success of rehabilitation (relocation) for lizards and this is why we have not claimed that the relocation will be successful, beyond achieving the starting densities (i.e. no uplift beyond the current state is assumed given the absence of intensive mouse or rat control in the rehabilitation areas). This is also a key reason why we have proposed pest exclusion fences to improve overall outcomes for impacted lizards (and potential trade-up benefits for non-impacted lizards via translocations). |

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| | fences. While the pest exclusion fences aren't large enough to claim net positive outcomes for impacted lizard species they will:<br>• go some way towards addressing residual effects on impacted lizards and these fences based on strong evidence that lizard populations recover in the absence of mammalian predators; and<br>• provide the opportunity to achieve net positive outcomes for the Ecological District through the opportunity to re-introduce and facilitate the recovery of nationally threatened species that were previously present but that have been extirpated from the local landscape | | Discussions were had with scientists familiar with large scale pest control programmes, and at t this time there is no demonstrable means of suppressing mice to levels that would benefit lizards at the scale we require. While trials may prove promising, on the assumption that these are still trials and in the absence of hard evidence we consider it inappropriate to claim that mice can be controlled at the scale and intensity required to benefit lizards. The Mammalian Pest Management Plan includes regular review and adaptive management provisions |

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| | | | that enable new methods and technologies to be incorporated as they become available. If a proven methodology for large-scale mouse control emerges, the plan has mechanisms in place to integrate it.<br><br>Perverse outcomes on lizards and invertebrates have been considered and is one of the reasons why we have claimed net loss outcomes. |
| **25**. Please clarify whether a net loss is expected for lizards. Table 26 of Report B.08 states that there will be a net loss for lizard species, but Section 8.7.2, Section 10, and Table 29 do | **MB**/**GU**<br>A net loss is expected for all three lizard species impacted by the project as stated in Table 1 of the executive summary and in Table 26 of Report B.08A and in Table 4 of Appendix 3 of Report B.08A.<br>In relation to Section 8:<br>• This section relates strictly to offsetting and compensation, which is different from | Explanation understood. As per above, there is a gap (size undetermined but potentially significant) regarding residual effects on lizards. This makes it difficult to determine whether the compensation package is appropriate. Is it correct to | **MB**/**GU**<br>We do not consider the net loss to be significant and expect that the scale of proposed ecological mitigation and compensation via pest exclusion fences will go a considerable way towards |

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| not state that this as an effect that is not mitigated, offset, or compensated for. If the mitigations, offsetting or compensatory actions are proposed, please explain how this has been calculated. | mitigation, as such so lizard mitigation is not addressed in this section (it is addressed in the section 7.<br>• No offsetting has been claimed because this is dependent on reliable quantitative data at the impact and offset sites, a reasonable understanding of projected outcomes associated with offsetting actions and the application of a biodiversity offset accounting model. The information available for lizards does not or cannot meet an offset standard so must default to compensation. This is explained in Section 8.2.2<br>• There is no 'calculation' for compensation rather, we have assessed based on professional opinion as explained in Section 8.2.2.<br>• Residual effects on lizards associated with project activities are compensated for through various habitat restoration measures within the Mine Regeneration Zone and Ardgour Restoration Area as described in the report and most notably through the establishment of two pest exclusion fences and the associated elimination of | assume that it is made more difficult by the fact that the lizard aspect is not separated from the vegetation etc which further downscales the likely/probable amount that is actually related to lizards? And if so, how has this been accounted for. | achieving no net loss outcomes. GU suggests a threefold increase in the number of lizards is expected within the pest exclusion fences (based on the outcomes of the Mokomoko Sanctuay monitoring to date) and if similar results are achieved for this project then we would expect the scale of net loss to be relatively low for the three impacted species. If lizard translocations are approved then we would expect there to be an overall positive benefit for the indigenous lizard assemblage (balancing residual losses for species on the site with considerable gains for more threatened species |

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| | mammalian pests and deployment of rock stacks and scattered rock therein. Details of residual effects management measures proposed, including those that will go some way towards compensating for effects on lizards, are detailed in Section 8.3. As concluded in Table 26, and as shown in the offset calculation tables and outputs in Appendix 3 of Report B.08A, the proposed suite of compensation measures will generate benefits for impact lizards, they are not at the scale needed to claim net positive outcomes for impacted species.<br>Section 10 and Table 29 relate explicitly to impacted values for which the limits to offsetting or compensation principles are unlikely to be met or may not be met. The lizard species impacted by project activities are not mentioned in this context as we do not consider the net loss outcomes that remain after compensation to be inconsistent with the limits to offsetting principles. | | that will brought to the site). |
| ***Avifauna*** | | | |

| ORC RFI question | MG response 14/01/2026 (**MB** = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock) – *David Norton was unable to comment in the time available but will be available to do so in the future.* | ORC RFI response to MG response 22/01/2026 | MG second response 30/01/2026 (MB = Matt Baber), **GU** = Graham Ussher, **KB** = Keith Barber, **RS** = Robyn Simcock, **DN** = David Norton) |
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| **26**. Please indicate whether any further avifauna surveys have been undertaken since the ecological reports were written, or whether any further surveys are planned. If such surveys have occurred, please provide the survey data with an explanation as to how this informs species presence and population estimates updated. Please revise any reports, assumptions, or management actions accordingly. | **GU/MB**<br>No further survey work is planned nor deemed necessary to inform our assessment of effects or proposed effects management for birds | Understood. Given this, it is expected that certain wetland species will be assumed present onsite and any necessary adjustments made accordingly, instead of ruling them out with further surveys. | **GU/MB**<br>We do not agree with this based on habitat quality, landscape context and the results of surveys undertaken. We do not consider the likelihood threshold to be met to assume presence. This is outlined in the Avifauna Assessment Report. Regardless, we expect that some wetland species will colonise the 7.5 ha swamp/marsh complex that will be created as part of the ecological mitigation package and as such, we expect net positive outcomes for wetland species. |

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| **27**. Please review the threat status of bird species found or suspected to be present. At sections 2.4 and 3.1.2 of their memorandum e3 note several species for which the threat status has been updated. Please revise any reports, assumptions, or management actions accordingly. | **GU/MB**<br>In report B.08A, the only correction to be made is that the Little Shag has been incorrectly stated as Regionally At Risk relic instead of Regionally vulnerable per tables 1, 8 and 26. For all other species, assignment of regional status accords with the latest regional threat status document (Purdie et al. 2005). For little shag this correction elevates the residual effect from 'Very Low" to 'Low' which constitutes an immaterial change in terms of the assessment of effects or effect management package.<br>Please also note that Table 18 of Report B.08 relates entirely to the magnitude of effects assessment. As described in the Ecological Impact Assessment Guidelines (EIANZ 2018) and in the methods section of B.08 this is completely different from and independent to an ecological values assessment which is derived from threat status. As such, this table is not be affected by the regional threat status error. | First Paragraph:<br>In meeting - reference is meant to be Jarvie et al 2025.<br>Black shag in Table 13 to be updated to Regionally Endangered to be consistent with the rest of the report and therefore the Ecological Value updated to Very High, and flow on updates to the level of effects etc. needed.<br>Second paragraph:<br>As per the EcIAGs, the residual MOEs are inherently linked to the Ecological Value, as the MOE and Ecological Value are used together to determine the overall level of effect (from which the residual MOE is derived (Table 10, EcIAG)). | **GU/MB**<br>Response noted and agreed in that we consider the ecological value and magnitude of effects assessment to be independent assessments but to be inherently linked as they are combined to determine the level of residual effects. Further to this Table 13 needs updating accordingly as per our initial response and E3s response to our response. |

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| **28**. With reference to the points listed in the second paragraph of section 3.1.2 of e3's memorandum, please explain whether the magnitude of residual adverse effects on bird species as set out in Table 18 of Report B.08 remain accurate | **GU/MB**<br>Table 18 of Report B.08 relates entirely to the magnitude of effects assessment. As described in the Ecological Impact Assessment Guidelines (EIANZ 2018) and in the methods section of B.08 this is completely different from and independent to an ecological values assessment which is derived from threat status so this table will not be affected by changes to threat status.<br>The tables that need to be updated in relation to the regional threat classification error for little shag are Table 1, 8 and 13 – though this update does not materially change the assessment of effects for this species as described above. | Please refer to e3s response above. Further, Table 18 still has omissions, e.g. fernbird. | **GU/MB**<br>Please see response above |
| **29**. Please explain how the following factors have been taken into account in assigning invertebrate values and determining subsequent mitigation / offsetting | **GU/MB/KB**<br>As an overarching comment and for context, this survey is one of if not the most comprehensive invertebrate surveys every undertaken for the purposes of informing an assessment of effects. Moreover, when deciding on the target species, methods and level of effort applied to invertebrate survey work, the degree to which surveys contribute to understanding of values, | Explanation understood. | No further response |

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| / compensation actions:<br>a. The exclusion of malaise trapping, which would predominantly target Hymenoptera and Diptera orders;<br>b. Lack of data resulting in numerous species remaining unassessed; and<br>c. The effectiveness of sweep netting to sample of day flying moth. | effects or effects management requirements must be considered. This will be a function of:<br>• The likely importance or significance of the invertebrate assemblage<br>• technical constraints or challenges with available survey methods per, i.e., the feasibility of effectively surveying target species<br>• constraints to interpreting survey results including the absence or near absence of context to determine or understand the level or significance of an effect<br>• the lack of information on how to manage effects (beyond avoidance).<br>Specific responses are below<br>**Response to Question (a) - Exclusion of Malaise Trapping:**<br>Malaise trapping was excluded from this study due to several practical and scientific constraints associated with Diptera and Hymenoptera sampling in New Zealand:<br>Diptera is an extremely large and diverse order with thousands of potentially undescribed or poorly known species in New Zealand, requiring highly specialised taxonomic expertise that is in | | |

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| | limited supply compared to better-studied groups (e.g., Lepidoptera, Coleoptera, Arachnida). Currently, no specialist Hymenoptera taxonomist is available in New Zealand for specimen identification. These taxonomic knowledge gaps result in significant data deficiencies regarding distribution, abundance, and ecology of many species, particularly in Otago, making it difficult to contextualise findings or assess conservation significance.<br>Notwithstanding this, the dataset from this project included more than 200 individual Diptera, and 200 individual Hynenoptera samples.<br>Despite the exclusion of malaise trapping, invertebrate values were assigned using light trapping, pitfall trapping, hand searches, sweep netting, and eDNA analysis of predator stomach samples. These methods effectively captured target groups and provided sufficient data to assess ecological values and inform mitigation requirements. To our knowledge, this represents the most comprehensive invertebrate study undertaken for any resource consent | | |

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| | application or Fast Track application in New Zealand, providing a robust foundation for determining appropriate mitigation, offsetting, and compensation measures.<br>**Response to Question (b) - Lack of Data and Unassessed Species:**<br>The data gaps regarding unassessed species stem from New Zealand's broader invertebrate taxonomy and ecological knowledge limitations, not from deficiencies in our field methodology. Much of New Zealand's invertebrate fauna remains undescribed, poorly known, or unassessed for conservation status—a widely recognised challenge reflecting limited historical research effort, taxonomic expertise, and baseline distributional data. To address this, we have consulted directly with taxonomic specialists including Dr Robert Hoare (Lepidoptera), Dr David Seldon (Coleoptera), Dr Cor Vink (Arachnida) and Dr Samuel Brown (Weevils) to interpret the ecological significance of our findings beyond what is available in published literature. | | |

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| | A precautionary approach was applied where uncertainty existed regarding the presence of potentially significant species. This approach ensures that mitigation, offsetting, and compensation actions are based on robust, defensible data while acknowledging the inherent limitations of current invertebrate knowledge in New Zealand.<br>To our knowledge, this represents the most comprehensive invertebrate study undertaken for any resource consent application or Fast Track application in New Zealand, providing a robust foundation for determining appropriate mitigation, offsetting, and compensation measures.<br>**Response to Question (c) - Effectiveness of Sweep Netting for Day-Flying Moths:**<br>Sweep netting is a well-established method for sampling day-flying Lepidoptera and was conducted at all representative and targeted monitoring sites, plus numerous ad hoc locations across the study area. This approach enabled targeted detection of day-flying moths in their preferred microhabitats during peak activity periods. Over 200 individual moths were | | |

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| | collected, representing 22 families and 68 genera.<br>This represents the most comprehensive assessment of day-flying moths undertaken for any resource consent or fast-track application in New Zealand that we are aware of. We consider the sampling effort appropriate for the project scope. | | |
| **30**. The overarching comments from e3 about the various ecological management plans included with the application are that they are lacking in detail and certainty, do not clearly replicate the broad objectives of Report B.08, lack quantifiable / measurable outcomes, are often experimental in nature or rely on | **MB/GU/RS/KB/**<br>We agree in some instances that further detail is required in the monitoring plans and that there are helpful suggestions from E3 that will provide additional certainty of outcomes or better outcomes that can be practically achieved. For instance, this includes but is certainly not limited to a switch to focusing salvaging operations on At Risk species only (i.e. tussock skink and kawerau gecko and providing detail on measures to reduce electrocution risk to birds. That said, there are recommendations that we do not support for a variety of reasons. For instance, the suggestion to set arbitrarily based targets or thresholds where this is little to no ecological evidence to base these on. | It is not clear what further detail/recommendations will or won't be added to Management Plans/Reports.<br>Appropriate targets show what the outcome will be, without which, the end ecological outcome cannot be known. For example, as per page 17 of the e3s memo "*For the Ecological Rehabilitation Sites, after 35 years, greater than 80% cover would be expected, ideally greater than 90%. There is also only "an increase" stated for the rest of the targets, which would* | **MB/GU/RS/KB/DN**<br>We agree that further work is required on the management plans and the most effective and efficient means of improving management plans is through workshops with relevant experts from all parties once all parties have provided feedback and comment. As such, we are waiting for further feedback to determine our response and at this time can only state that we |

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| research that has not yet been done, and do not contain adequate corrective actions or contingency plans if the proposed rehabilitation actions are not successful. Please consider providing updated management plans, or revised conditions of consent, that address these concerns. Specific examples of the types of improvements that could be made can be found throughout the e3 memorandum. | We consider a series of workshops to advance consent conditions and management plans would be useful once comments and feedback from other regulatory authorities and invited parties is available. | *allow only a 1 % increase in plant species richness and dominance and bird abundance to meet the target outcomes. This is not sufficient given the proposed ecological impact. Specific targets are required to ensure stated ecological mitigation/offsets are achieved, e.g. > 80 % increase in biodiversity metrics within 35 years of approval.*".<br>Agree with proposed workshop(s), with all regulatory authorities and invited parties. | agree that changes are needed. However, in terms of targets we note the setting of definitive evidence based and meaningful targets are simply not possible for a number of biodiversity values due to limitations with data collection or interpretation, or predicting responses and this needs to be factored into determining which metrics are used to verify stated outcomes versus those outcomes that are assumed but can't be verified. We also note that an inability to verify outcomes for a number of values (e.g. invertebrates) has influenced our expectations. |

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| Apologies – e3 have one further comment on the draft response. This is below:<br><br>I think there is one further piece of information that Trudy will want in hard copy rather than what we were verbally told in the meeting. This is the mapping of the manual search area for lizards. They said they had done manual searches around the points (fixed monitoring points, ACOs, and Gee-minnows) but it is still subjective as to how far out they | **GU**<br>The manual search areas are show on Figure 4 of the lizard survey report (page 28).<br>Below are some clips from our GIS that show in better detail most of the sites where lizard survey was undertaken in proximity to wet areas – i.e. wetlands or stream margins.<br>In each of these clips:<br>• the blue shaded areas are manual search areas.<br>• the blue triangles or purple squares, or red stars are pitfalls, ACOs, gees minnows or tracking tunnels.<br>• the turquoise shaded polygons are mapped wetlands.<br>• streams are not shown (as we did not map those), however in each clip it is obvious from contours where streams lie.<br>In any cases, the wetlands had water above ground and no manual salvage, or installation of gear could be placed directly in the wetland (rather sampling occurred around/ in proximity to the stream or wetland areas. | | |

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| went. To ensure it was close enough to wetlands and other habitats, it really would be good to have the search areas shown on a map (which to date has not been provided). Can this please be added to our response back to the applicant? |  | | |

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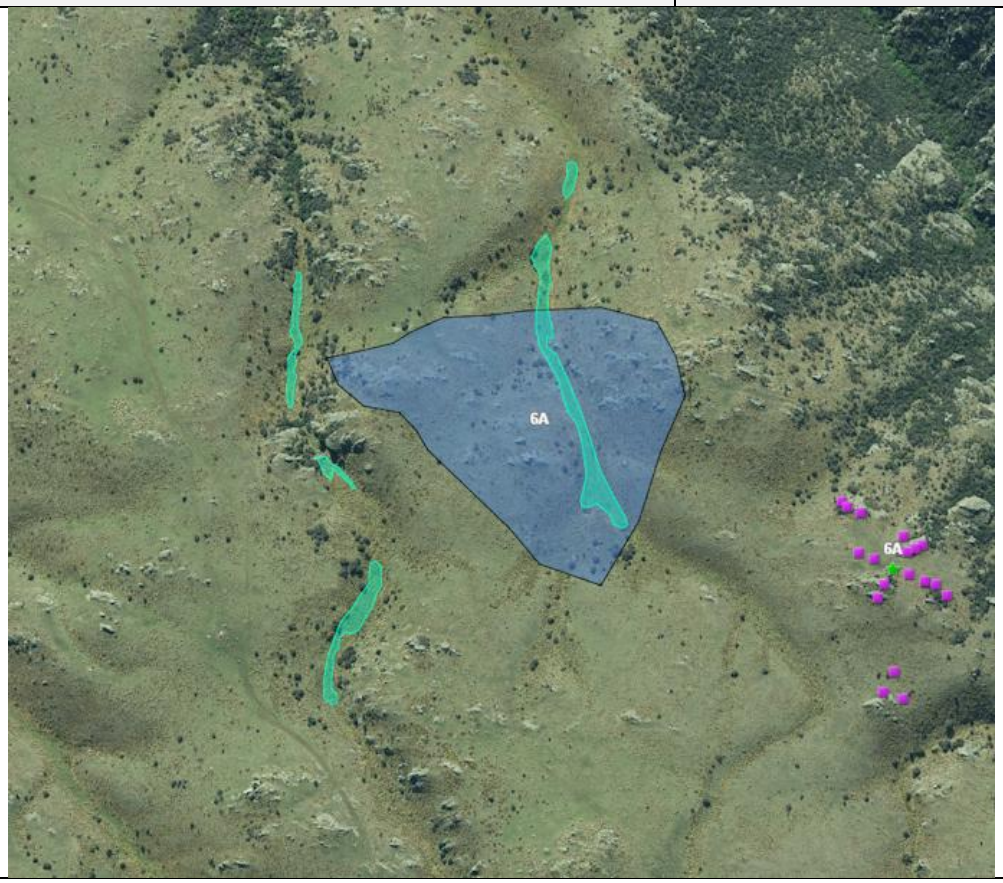
| |  | | |

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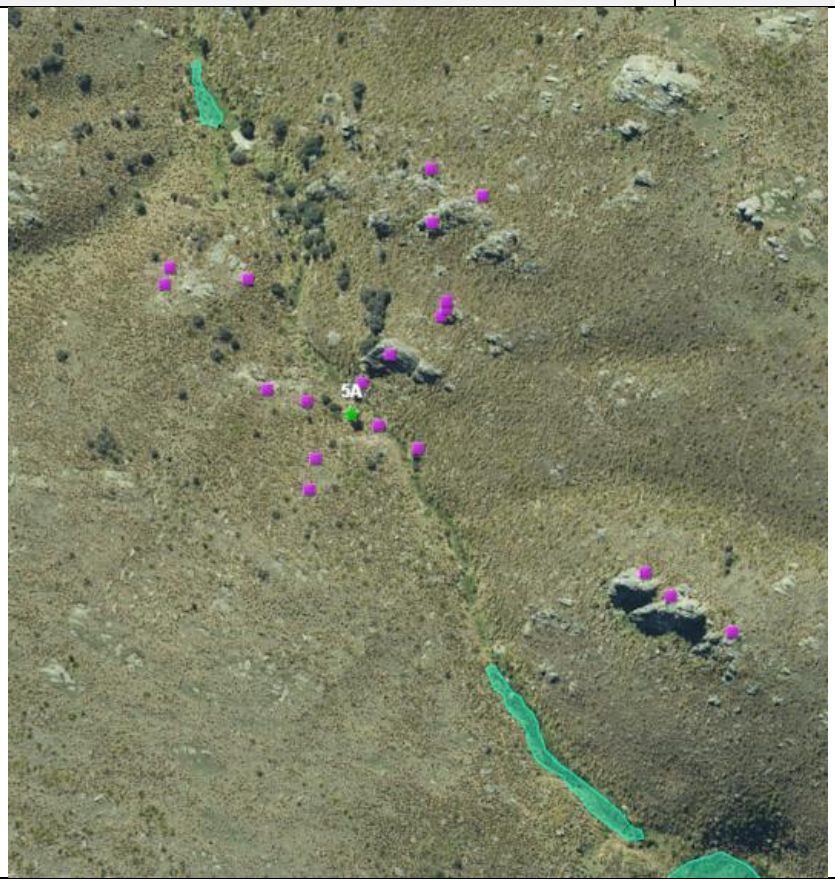
| |  | | |

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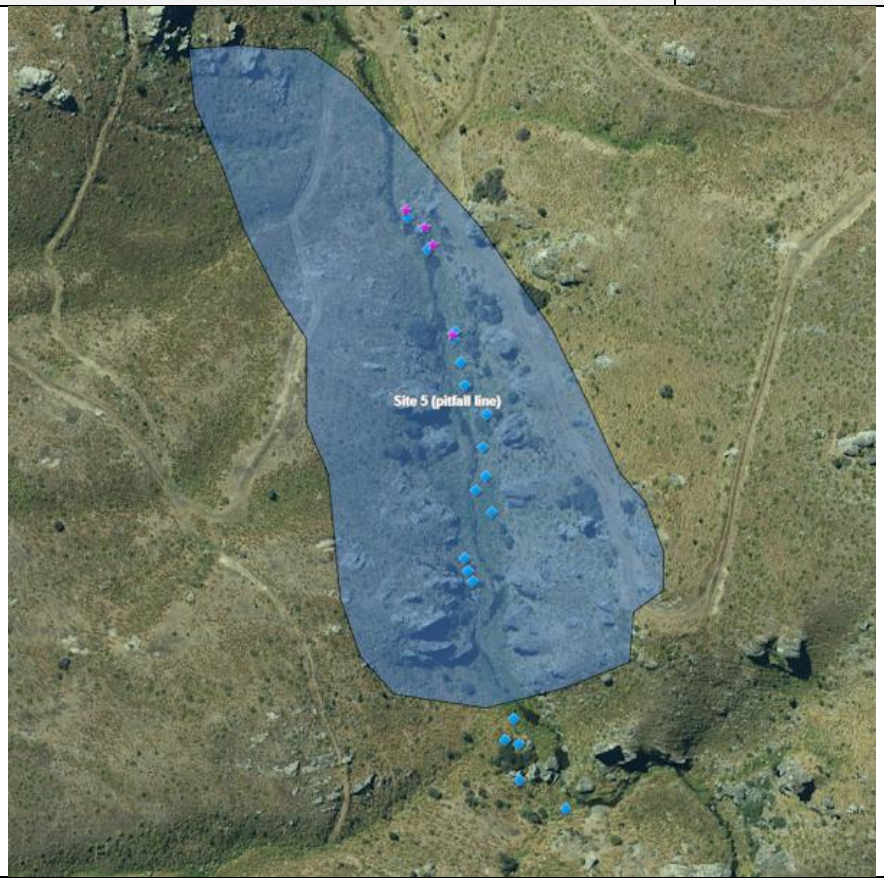
| |  | | |

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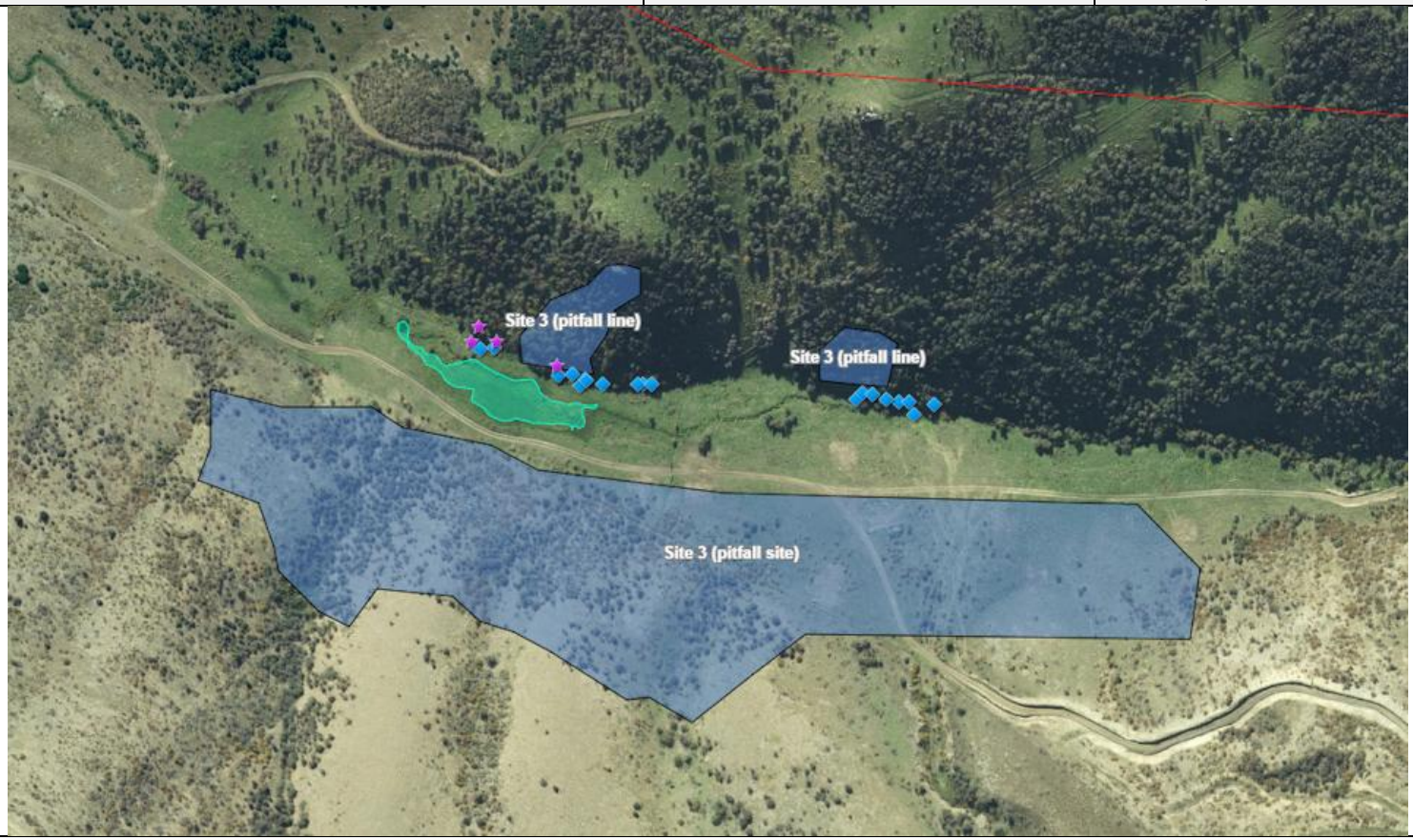
| |  | | |

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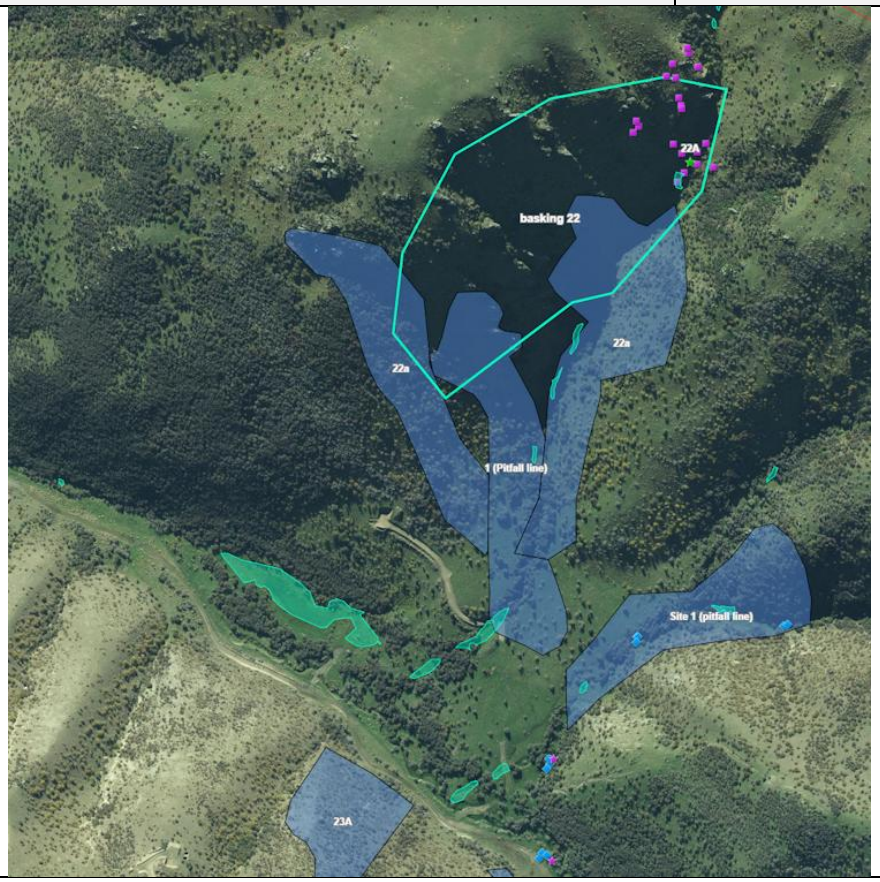
| |  | | |

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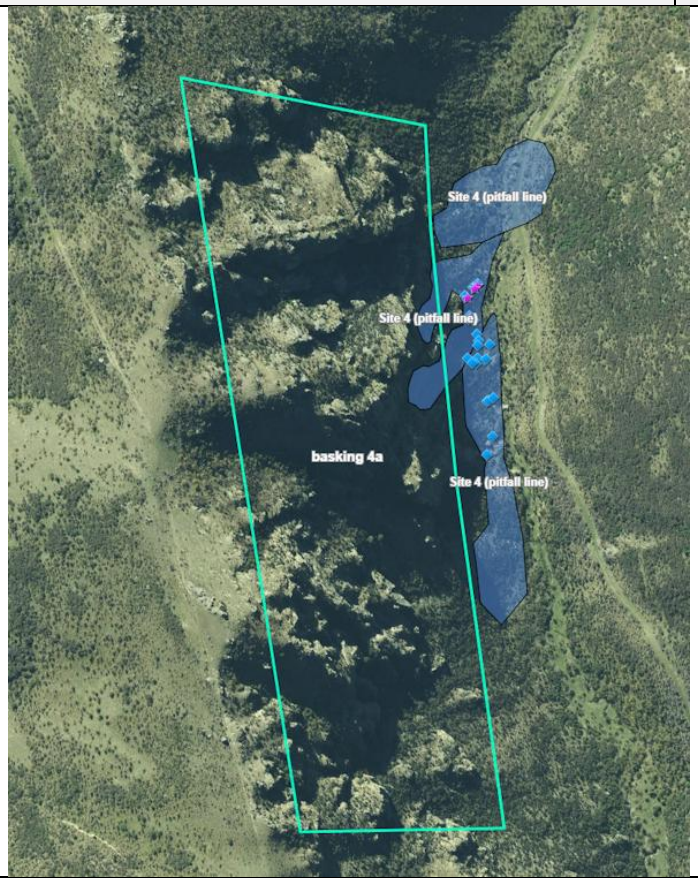
| |  | | |