

31 October 2019

Freshwater submissions
Ministry for the Environment
By email to consultation.freshwater@mfe.govt.nz

Action for healthy waterways

1. This is a submission by the Major Electricity Users' Group (MEUG) on the discussion paper "Action for healthy waterways", the draft National Policy Statement for Freshwater Management (NPS-FM) and related materials published by the Ministry for the Environment on 5th September 2019.¹
2. MEUG members have been consulted in the preparation of this submission. This submission is not confidential. Some members may make separate submissions.
3. In the section below MEUG responds to question 19 in the discussion paper:

"Does the proposal to allow exceptions for the six largest hydro-electricity schemes effectively balance New Zealand's freshwater health needs and climate change obligations, as well as ensuring a secure supply of affordable electricity?"

Recommend NPS-FM clause 3, Exception for large hydro schemes, apply to all existing schemes

4. Clause 3 of the NPS-FM requires regional councils when setting limits or developing actions plans to "have regard to the importance of not adversely impacting the generation capacity, storage and operational flexibility of" hydro- electricity generation schemes on the six largest hydro rivers in place at 1st August 2019.
5. MEUG objects to this favoured approach to the largest incumbent generators that own stations on those rivers. There is no evidence provided in the discussion paper that:
 - a) The owners of generation on the six largest hydro-electricity generation schemes are better at managing the environmental impact on their freshwater catchments than smaller generators; and

¹Refer <https://www.mfe.govt.nz/consultation/action-for-healthy-waterways>. URL for discussion paper at <https://www.mfe.govt.nz/sites/default/files/media/Fresh%20water/action-for-healthy-waterways.pdf>. URL for NPS-FM at <https://www.mfe.govt.nz/sites/default/files/media/Fresh%20water/draft-npsfm.pdf>.

- b) There is no evidence that all or even any owners of generation on smaller hydro-river chains have a history of systemic detrimental effects on freshwater ecosystems they operate in. It is therefore unclear what policy issue is being addressed to justify higher level of scrutiny for smaller generators compared to those on the six largest river chains listed in subclause 3.22(1).
6. Absent any evidence that discrimination in favour of large generators is warranted, MEUG recommends all existing hydro power stations in places at 1st August 2019 be accorded the same limited exception provisions and be listed in subclause (1). We emphasize this is a limited exception because subclause 3.22 (4) requires regional councils, even for the six schemes listed “must still set target attributes states that, to the extent possible, improve any waterbody or freshwater ecosystem affected by any Scheme.”

Yours sincerely



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