

Board of Inquiry – NPS for Renewable Electricity Generation
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SUBMISSION TO BOARD OF INQUIRY FOR THE PROPOSED NATIONAL POLICY STATEMENT FOR RENEWABLE ELECTRICITY GENERATION

By Tony Haddon , Rick Barber, Mike Drake on behalf of :

Wild Rivers Action Project (www.wrap.org.nz) is a non-incorporated internet entity which is a portal to an online parliamentary petition calling for an end to the destruction of New Zealand's wild rivers by hydro electric dam construction. Currently there are 1,700 signatories.

1. We support a NPS on renewable energy, just as we support the NZES in that it is possible to achieve 90% renewable generation, but not without significant demand management. There must be a limit to demand growth.
2. *“Recognising the national significance of the benefits of renewable electricity generation activities”* In our opinion the only “benefit’ Nzers stand to gain is a dubious distinction as appearing at first glance as prominent followers of the Kyoto Protocol. Current renewable generation technology almost inevitably will have some sort of negative impact on people and the environment. It appears to us to be a nonsense when we go to so much trouble and expense to lower our carbon footprint when NZ exports so much fossil fuel – coal- to be converted to CO2 overseas.
2. The purpose of the NPS should give at least as much weight to avoiding inappropriately sited projects and pursuing demand management (efficiency, conservation, cogeneration, distributed generation), as it does to easing the way for more renewable projects.
3. We strongly support the reversibility clause - irreversible hydro-dams have a much greater environmental and landscape impact than relatively-reversible run-of-river, wind, geothermal, solar, tidal or wave, and are not a sustainable use under the RM Act. For example, the Mokihinui dam proposal would irrevocably destroy 14 km of waterway and 1000 hectares of forest. How could this fail to compromise the ability of future generations to meet their own needs ?
4. We assert that the statement re national benefits (new renewable generation) v local costs (re landscape) is incomplete. There are significant national costs such as impact on biodiversity, and the loss of wild rivers. Aucklanders too may appreciate the amenity values of South Island rivers.
5. Because of the potential for renewable energy proposals to have significant effect on biodiversity and wild landscapes (the Mokihinui is a good case study), there MUST be a statement about ecological protection in the NPS. This should have two

parts: it should make clear which landscapes are out-of-bounds for all proposals (e.g. the Mokihinui is in conservation land, is ultra-high biodiversity value, and an unmodified wild river); and it should also have a statement about requiring proposers to site and configure proposals for minimum ecological impact from the beginning (e.g. Mt Cass windfarm and some turbines being sited on ecologically rare geology and forest when there are less impacting sites further down the ridge).

6. There must be a statement that recognises the cultural, recreational and ecological values that NZers place on wild outdoor places, and the access and recreation opportunities in them. The "wild river and ridge" idea is a landscape value - i.e. wildness is in the eye of the beholder. This is different but complementary to ecological values (inherent values of indigenous biodiversity).

7. Most importantly, there should be acknowledgement of the incompatibility of infinite growth in electricity demand and the finite nature of natural resources.

Thank you

MD,TH, RB