

Submission on National Policy Statement for Renewable Electricity Generation
Nelson Canoe Club
18th October, 2008

General: We believe that a National Policy Statement for recreational use of rivers should be developed at the same time as this NPS. The reason is that existing, ratified NPS's will take precedence over NPS's that have not been developed and therefore our recreational values will not be upheld as they should.

Policy 1: We believe that electricity generation benefits of national significance should not take precedence when a resource of national (and sometimes international) significance for recreation is at stake. If hydro-electric power (HEP) plants cause such adverse effects, then an alternative method of renewable electricity generation should be used (e.g. wind, or solar since both are reversible).

Policy 3: We totally support the concept of reversibility associated with particular generation types. HEP plants using dams on rivers are likely to produce adverse effects that are not easily reversed or remediated. We think that the reversibility needs to be defined and could be defined as the cost of restoring the resource to the original condition.

There are many overseas examples of dams that have reached the end of their life and now the cost of removal is prohibitive to the companies involved. In many of these examples the cost of dam removal is a very significant proportion of the total income generated from the sale of electricity from the plant. Often the HEP company has gone into receivership and so the dam sits as an orphan site, still causing adverse effects and probably will continue do so for generations to come.

End-of-dam-life plans should be produced in all dam developments (as is the case for mining activities). Bonds should be provided, enough to cover the removal of the dam and all adverse effects.

Policy 4: We don't think that local authorities (TLA's) should be involved in identification of renewable generation possibilities for the following reasons:

1. They neither have the expertise, corporate knowledge or the capacity to do this, whereas the power companies have all this and it would create unnecessary duplication to provide this (with an impact on rates).
2. It is the TLA's important job is to determine whether the adverse effects on the environment are more or less than minor and to investigate and propose resource trade-offs, assuming conflicting values exist at a site. To put the TLA in a position of developing electricity generation produces a conflict of interest.

At the same time as identifying significant sites for HEP, sites of significant river recreation should be identified. Again because in isolation the generation values will gain dominance and any court decision will be influenced by this unduly.

For every HEP site proposed where there are significant adverse effects, there should be an analysis of alternatives.

The assumption appears to be that a larger number of smaller sites on higher order waterways, is a supply opportunity not addressed. All scales of hydro sites will pose risks of adverse effects on other water body values (eg. conservation land, headwater spawning, vs landscape and intstream sports and recreation). The efficiency of location with respect to demand and efficiency of output compared to adverse effects are relevant criteria for comparing concepts. Some schemes such as the Mokihinui HEP dam proposal have a very small power generation capacity for a large environmental effect (particularly forest habitat, coastal erosion and recreation).

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18/10/08

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