

Form 3
**Submission on proposal for national policy statement for
renewable electricity generation**

In accordance with section 49 of the Resource Management Act 1991

The Chairperson
Board of Inquiry – NPS for Renewable Electricity Generation
Attn: Melissa Keys
Ministry for the Environment
P.O. Box 10362
Wellington 6143

renewable.electricity@mfe.govt.nz

Introduction

This is a submission on the proposed national policy statement for renewable electricity generation by Otago Fish and Game Council. The Council is responsible for management of sports fish and game within Otago. The key to managing wild self sustaining populations of sports fish and game is protection of freshwater habitats – rivers, lakes and wetlands.

The specific provisions of the proposal that my submission relates to are the NPS and the supporting policies 1,2,3,4,5

My submission is:

The NPS on renewable energy should be amended to reinforce the protection of the rivers, and landscapes in highly sensitive location

The reasons for my submission are:

Very many rivers within New Zealand have been developed for hydro power generation to the point where many rivers or river reaches have been lost and in some parts of the country there are few free flowings rivers left. There comes a point where the non-renewable stock of remaining rivers with important natural and amenity values should be protected as essential elements of the New Zealand landscape for future generations.

While it is desirable for New Zealand to tackle climate change issues and to encourage the development and use of so called ‘renewable energy’ sources this needs to be done in conjunction with determined protection of remaining rivers as landscape features.

Renewable energy development needs to be steered away from hydro development towards:

- Geothermal energy sources
- Wind power in areas other than those highly sensitive to landscape impacts.
- Small scale energy generation (eg solar power)

In addition New Zealand needs to address energy supply and demand issues by:

- Siting generation close to end users
- Transmission loss
- Recognising the disproportionate contribution to energy production that some regions are already making from the development of natural resources (for example Otago)
- Encouraging or requiring dispersed energy production, particularly amongst some sectors of industry (eg dairy)
- Discourage those industries that are very heavy energy users and encouraging those that are not
- Encouraging or requiring much greater levels of energy conservation.
- Giving weight to factors such as environmental impacts and reversibility

I seek the following changes to the proposal:

Policy 3 is amended so that the heavy contribution that rivers have already made to renewable energy production is recognised by more heavily weighting the balance against further river development where there are important natural or amenity values or where significant development has already taken place within a region or where development is a long way from end users

I wish to be heard in support of my submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

Niall Watson
Chief Executive

On behalf of **Otago Fish and Game Council**

30 October 2008

(A signature is not required if you make your submission by electronic means.)

Address for service of submitter:	PO Box 76, DUNEDIN
Telephone:	03 4779076
Fax/email:	03 4770 146
Contact person:	Niall Watson, Chief Executive
email	n.watson@fish-game.org.nz