7 May 2025

The Hon Chris Bishop
Minister Responsible for RMA Reform

By email: Chris.Bishop@parliament.govt.nz

**ELECTRICITY SECTORS DRAFT NATIONAL POLICY STATEMENT FOR RENEWABLE ELECTRICITY GENERATION**

This letter has been prepared by the Electricity Sector Environment Group (**ESEG**) in anticipation of the upcoming consultation on the review of the National Policy Statement for Renewable Electricity Generation (**NPS-REG**), as signalled in your speech to the NZPI at the end of March. Accordingly, we have **enclosed** a draft NPS-REG prepared by the ESEG, which is considered best practice, workable, and effective.

The ESEG is made up of New Zealand's principal electricity generators comprising Meridian Energy, Mercury NZ, Contact Energy, Manawa Energy, Genesis Energy and NZWEA.

The Electrify NZ initiative aims to double the amount of renewable electricity and ensure a secure supply of affordable clean energy and is strongly supported by the ESEG. To achieve these goals, New Zealand must develop REG at an unprecedented rate, requiring 1,250 GWh/y of new REG every year until 2050. This will involve significant collaboration between various departments and stakeholders to ensure that the necessary infrastructure and investment are in place.

Since 2011, participants of the ESEG have liaised with officials and ministers on the NPS-REG without any changes being made. Clearly, there is now an urgent need for a bold and directive national policy to enable renewable electricity generation (**REG**) and ensure a secure, reliable, and cost-efficient electricity supply. The current consenting process is fraught with excessive risk, uncertainty, cost, and delay, making the country's electrification and emission reduction targets essentially unachievable.

The enclosed proposed NPS-REG 2025 aims to address these issues by providing a clear and comprehensive consenting pathway for REG projects while maintaining robust environmental protections. The ESEG notes that the consultations with officials thus far have not addressed the industry's pressing challenges and have generally reiterated 'past thinking'

apparent in the development of the now repealed Natural Built Environment Act and Spatial Planning Act.

One of the key concerns is the need to resolve conflicts between competing national policy statements and ensure that approvals involving both existing REG assets and new REG projects are not thwarted by conflicting policy priorities. The NPS-REG 2025 must provide a clear and directive policy framework that prioritises the benefits of existing and new REG for climate change mitigation over local adverse effects. This will require a comprehensive consenting pathway that fully resolves conflicts with other national and local policy directions.

The major differences between the prior pre-consultation versions of the NPS-REG discussed with Officials to date and the enclosed draft prepared by ESEG are as follows:

- Stronger more Directive Policy that can deliver REG consenting at the pace and scale needed to meet New Zealand's energy and electrification targets.

- Stronger recognition of the critical importance of Existing REG: The enclosed policy secures and protects existing REG and requires that the 'existing environment' they create is applied as the starting point for effects assessment.

- Targeted protection of Environmental Values: The previously broad Specified Environmental Values approach has been replaced with a more targeted scope of Areas of National Importance, requiring the identification of these areas in Plans.

- Realistic Effects Management: The 'no-effects' requirements inherent in the Effects Management Hierarchy of other national direction have been replaced with an effects management framework that anticipates the possibility of some residual development effects, achieving nil-effects is simply not feasible in the real world.

ESEG strongly requests that its version of the NPS be included as part of the formal consultation process, as either the preferred option or at least an alternative option to ensure that New Zealand can meet its decarbonisation and electrification targets and respond effectively to the existential threat of climate change. As I am sure you will agree, clean, secure and affordable electricity system is essential.

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