

Response ID ANON-URZ4-5F8D-C

Submitted to Fast-track approval applications
Submitted on 2024-05-03 09:45:49

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
Genesis Energy Limited (Genesis)

2 Contact person

Contact person name:
Ellie Watson

3 What is your job title

Job title:
Environmental Manager - South Island Renewables

4 What is your contact email address?

Email:
s 9(2)(a)

5 What is your phone number?

Phone number:
s 9(2)(a)

6 What is your postal address?

Postal address:

West Building, Level 2
335 Lincoln Road
Addington
Christchurch 8024

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

The Tekapo Power Scheme is located between Lake Takapō and Lake Pūkaki as shown in the attached Tekapo Power Scheme figure.

The Tekapo Power Scheme includes the following sites:

- Tekapo Intake – Lot 1 DP 421602, Lot 1 DP 562455;
- Tekapo Control Structure – Lot 1 DP 439605;
- Tekapo A – Section 2 SO 567261;
- Tekapo Canal – Lot 2 DP 364538;
- Tekapo Canal / Tekapo B Headgate – Lot 1 DP 407182;
- Tekapo B – Lot 2 DP 407182;
- Takapō (operating easement) – Section 1 SO 331257 / Section 7 SO 455486,
- Section 1 SO 20293; and
- Takapō River (operating easement) – Section 1 SO 394353, Section 2 SO 394353.

Physical address: Tekapo A Power Station, 167 Tekapo Powerhouse Road, Tekapo.

File upload:

Tekapo Power Scheme.pdf was uploaded

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Do you have a current copy of the relevant Record(s) of Title?

Yes

upload file:

Titles and Deeds of Easement.pdf was uploaded

Who are the registered legal land owner(s)?

Please write your answer here:

Genesis Energy Limited and the Crown

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

Genesis owns the land on which the Tekapo A power station, Tekapo B power station and Tekapo Canal are located and has operating easements with respect to Crown land adjacent to and affected by the Tekapo Power Scheme, being Lake Tekapo/Takapō and the Takapō/Tekapo River. Genesis has received affected party approval from the Commissioner of Crown Lands (LINZ) with respect to the consent applications.

Section 2: Project details

What is the project name?

Please write your answer here:

Tekapo Power Scheme – Applications for Replacement Resource Consents

What is the project summary?

Please write your answer here:

An application for controlled activity resource consents to replace resource consents that expire on 30 April 2025 that would enable the ongoing operation of the nationally significant Tekapo Power Scheme.

What are the project details?

Please write your answer here:

The purpose of the project is to obtain replacement consents to enable the continued, status quo operation of the Tekapo Power Scheme which contributes to New Zealand's current and future renewable energy requirements and will also continue to contribute water for the additional generation of renewable electricity via the downstream Waitaki Power Scheme operated by Meridian Energy Limited.

The objective of the project is to obtain replacement consents that allow for the current activities to continue whilst appropriately mitigating effects by way of the proposed consent conditions (that are largely agreed by mana whenua and key stakeholders). The current activities that Genesis is seeking replacement consents for include:

- Water Permit - To dam, take, divert and use water associated with the operation of the Tekapo Power Scheme.
- Discharge Permit - To discharge water and associated contaminants associated with the operation of the Tekapo Power Scheme.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

Tekapo A power station was commissioned in 1951 and Tekapo B power station in 1977. The resource consents sought do not involve any material changes to the hydrological regime of the Tekapo Power Scheme and seek to maintain "status quo" flow regimes such that the existing environment will continue.

Genesis is seeking reconsenting of an existing scheme. While Genesis wishes to use the Fast Track process, it is imperative that if Genesis is listed in Schedule 2A, it has flexibility of consenting process. That is because with its consents expiring on 30 April 2025 it must ensure that it remains able to continue to operate the scheme under s124 of the RMA as required and that, if the Bill is delayed, Genesis may need to remain in the standard processes. Further, because the details of the final legislation remain to be seen, Genesis must retain flexibility of process so that Genesis can use the standard process if necessary. One of the reasons for this is because Genesis is seeking controlled activity consents under the RMA they must be granted (subject to conditions). That is not the case under the Bill (which seems, is an inadvertent error).

Genesis has submitted on these matters (amongst others) in relation to the Bill.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource Management Act 1991 – Resource Consents

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Canterbury Regional Council.

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

Applications for the required resource consents were lodged with the Canterbury Regional Council in July 2023 and were accepted as complete in terms of Section 88 of the RMA on 14 August 2023. Since then, Genesis has been developing its response to a detailed 16 page request for further information under Section 92 of the RMA from Canterbury Regional Council.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

No other approvals are required as all other aspects of the ongoing operation of the Tekapo Power Scheme are authorised as permitted activities under the operative Waitaki Catchment Water Allocation Regional Plan, the operative Canterbury Land and Water Regional Plan, the operative Mackenzie District Plan and the proposed Mackenzie District Plan.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

The Tekapo Power Scheme is operating now. The consents sought will enable the ongoing "status quo" operation of the scheme.

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki, Te Rūnanga o Ngāi Tahu; Canterbury Regional Council; Mackenzie District Council; Department of Conservation, Central South Island Fish and Game Council, Tekapo Whitewater Trust / Whitewater New Zealand; Mount Cook Alpine Salmon; Meridian Energy Limited; Commissioner of Crown Lands.

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Genesis' approach to consultation and engagement is to be open, honest, inclusive and approachable. Genesis' assets are long-term, and often consist of large infrastructure within the communities and environments that we are privileged to operate in. Regardless of the consent process Genesis follows for projects, Genesis will continue to carry out thorough assessment and engagement processes and continue to propose mitigation that as far as practicable manages our effects on the environment and communities, as has occurred through the Tekapo Power Scheme resource consent application preparations.

The consultation undertaken is summarised in the attached Consultation Summary dated May 2024. Agreement has been reached with Te Rūnanga o

Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki, Te Rūnanga o Ngāi Tahu; Department of Conservation; Central South Island Fish and Game Council Mackenzie District Council; and NZ Transport Agency Waka Kotahi. Letters of support for the applications have been received from each of these. A letter of support has also been received from Mount Cook Alpine Salmon, and affected party approval has been received from the Commissioner of Crown Lands (LINZ).

Upload file here:

TekapoPS_Consultation_Summary.pdf was uploaded

Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

No processes are required under the Public Works Act 1981.

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

The Ngāi Tahu Claims Settlement Act 1998 applies to the area. Please see the attached report "Waitaki Treaty Impact Assessment July 2023" prepared on behalf of Te Rūnanga o Moeraki, Te Rūnanga o Waihao and Te Rūnanga o Arowhenua for Genesis and Meridian Energy Limited for an assessment of the Tekapo Power Scheme with respect to the Ngāi Tahu Settlement.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

Yes

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary:

Waitaki Treaty Impact Assessment July 2023 final (1).pdf was uploaded

Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

Based on technical assessments that have been prepared, the continued operation of the Tekapo Power Scheme will appropriately avoid, remedy or mitigate potential adverse effects on the existing environment. The assessments also demonstrate the positive effect that previous biodiversity enhancements (that will be continued and extended) have had on terrestrial invertebrates, lizards, water birds and vegetation.

Where more than minor ongoing adverse effects on a significant value have been identified mitigation measures have been proposed for avoiding, remedying or mitigating adverse effects of the ongoing operation of the Tekapo Power Scheme, which are reflected in proposed resource consent conditions that have been discussed and agreed with mana whenua and key stakeholders.

Please see the attached Assessment of Environmental Effects dated May 2024 for more fulsome details.

Upload file:

TekapoPS_Reconsenting_Effects_Assessment.pdf was uploaded

Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

The ongoing operation of the Tekapo Power Scheme is demonstrably consistent with the matters of national significance the National Policy Statement for Renewable Electricity Generation 2011 (NPSREG) provides for, and with the objective of the NPSREG.

The ongoing operation of the Tekapo Power Scheme is consistent with the objective and policies of the National Policy Statement for Freshwater Management 2020 (NPSFM). It provides an example of how the NPSFM can be implemented in practice to provide for a significant and nationally important water use activity while ensuring that the health and wellbeing of the Waitaki catchment freshwater ecosystems are prioritised and protected (particularly upstream of the Tekapo Power Scheme), the health needs of people are provided for and people and communities are able to provide for their social, economic, and cultural wellbeing.

The Tekapo Power Scheme is a renewable electricity generation asset and activity and therefore in accordance with clause 1.3(3) of, the National Policy Statement for Indigenous Biodiversity 2023 (NPSIB), the NPSIB does not apply to the reconsenting of the Tekapo Power Scheme.

The activities for which resource consents are sought for the Tekapo Power Scheme do not involve construction of any new structures such as culverts, weirs, flap gates, new dams or fords. The continued use and maintenance of existing structures associated with the Tekapo Power Scheme are not subject to the Resource Management (National Environmental Standards for Freshwater) Regulations 2020. There are no registered drinking water supplies that provide more than 25 people with drinking water downstream of the Tekapo Power Scheme so the Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007 do not apply.

Genesis records appropriate flow rates and provides the data to Canterbury Regional Council under the existing resource consents and will continue to do so, meeting any requirements under the Resource Management (Measurement and Reporting of Water Takes) Regulations 2010.

The attached National Environmental Standards and National Policy Statement Assessment dated May 2024 provides a more detailed assessment.

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TekapoPS_Reconsenting_NES_NPS.pdf was uploaded

Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

As above, the application was lodged with the Canterbury Regional Council in July 2023. Since then, in response to a detailed section 92 request by the Canterbury Regional Council, Genesis has been engaging with the Council on completing that work. This has resulted in delay in progressing the application and despite earlier agreement with Canterbury Regional Council on a key basis for reconsenting, the Council is now reconsidering its position. It is therefore likely there will be further delay given the council hearing process and potential for appeals thereafter. This is despite the project having been in existence for several decades (since 1951 in the case of Tekapo A Power Station); extensive technical assessments meaning there is a good understanding of effects; the national significance of the power scheme for renewable generation, and the support of key affected parties.

Genesis considers the use of the fast-track process should enable the project to be processed in a more timely and cost-efficient way that is appropriate for a consent application of this nature and will allow for the enhanced benefits of the project (including the Indigenous Biodiversity mitigation package) to be implemented.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

This project is ready to go with a complete Assessment of Environmental Effects and all other application documents. Further, it has a well defined scope and relates only to conditions relevant to the ongoing operation of the Tekapo Power Scheme. Referral of this project is an example of how the fast-track process could be used efficiently.

Has the project been identified as a priority project in a:

Central government plan or strategy

Please explain your answer here:

The combined Waitaki Power Scheme, which includes the Tekapo Power Scheme, has been identified as being regionally and nationally significant in the Canterbury Regional Policy Statement and Regional Plans, the Mackenzie District Plan and the Canterbury (Waitaha) Conservation Management Strategy 2016. Further, the Tekapo Power Scheme (as part of the Waitaki Power Scheme) is included in the NPSFM as one of the five identified large hydro-electric generation schemes.

Will the project deliver regionally or nationally significant infrastructure?

National significant infrastructure

Please explain your answer here:

The resource consents sought will enable the continued operation of the regionally and nationally significant Tekapo Power Scheme. The combined Waitaki Power Scheme, which comprises the Tekapo Power Scheme and six power stations operated by Meridian Energy Limited, contributes (on average) approximately 25% of New Zealand's total annual electricity supply requirements, and more than half of the South Island annual electricity demand. The lakes forming part of the combined power schemes typically provide up to 65% of New Zealand's controllable hydro storage capacity.

Will the project:

contribute to a well-functioning urban environment

Please explain your answer here:

The project will contribute to a well-functioning urban environment through the continued generation of electricity from a renewable energy source and through assisting New Zealand to meet its climate change targets. The project will not directly increase the supply of housing or address housing needs.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The utilisation of water diverted from the Takapō River by the Tekapo Power Scheme for the sustainable generation of electricity positively contributes to New Zealand's renewable electricity production, and the continued operation of the Tekapo Power Scheme would contribute to maintaining the present level of electricity generation from renewable energy sources.

The Tekapo Power Scheme (part of the combined Waitaki Power Scheme) is of national importance, with many social and economic benefits stemming directly from technologies relying on electricity and electricity becoming even more important as New Zealand moves to decarbonise the economy using renewable generation sources.

Hydro generation that has access to stored water has the twin benefits of being renewable and controllable, both of which will be increasingly important as New Zealand decarbonises its economy. Replacing the Tekapo Power Scheme output with alternative renewable sources would impose additional costs on society of around \$100 to \$125 million per year.

In addition to electricity related benefits, the Tekapo Power Scheme has also resulted in a range of positive benefits to other resource users, for example the Tekapo Canal is also the location of a large commercial salmon farm, and for a number of irrigation off take structures, and is a highly valued recreational venue (most notably the Tekapo Canal sports fishery, and for cycling/walking along the Alps 2 Ocean Cycle trail).

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

The Tekapo Power Scheme generates substantial volumes of 100% renewable electricity. In energy terms, the Scheme's average annual output (from both direct and indirect generation) is sufficient to supply approximately 222,000 Canterbury households.

Hydro generation such as that provided by the Tekapo Power Scheme is important because it has access to stored water in Lake Takapō. This type of generation has the twin benefits of being renewable and controllable, both of which will be increasingly important as New Zealand decarbonises its economy.

Electricity is vital in daily New Zealand life, with many social and economic benefits stemming directly from technologies relying on electricity. It is anticipated that electricity will become even more important as New Zealand moves to decarbonise the economy using renewable generation sources.

In 2022 (latest year for Ministry of Business, Innovation & Employment data provided at <https://www.mbie.govt.nz/building-and-energy/energy-and-natural-resources/energy-statistics-and-modelling/energy-statistics/electricity-statistics/>), approximately 40% of electricity generated in New Zealand is consumed by primary industry and aquaculture. Moves by industries such as the dairy sector to install electrode boilers and the steel industry to install electric-powered furnaces means that reliance on electricity generated from renewable

energy is likely to grow within the primary industry sector in future. Maintenance of the Tekapo Power Scheme renewable electricity generation capacity is therefore fundamental to supporting primary industries, including aquaculture in New Zealand.

In addition to its contribution to national electricity supply, the Tekapo PS provides power to consumers in the Tekapo Albury region valued at approximately \$16 million (present value).

Will the project support development of natural resources, including minerals and petroleum?

Yes

Please explain your answer here:

The continuation of the Tekapo Power Scheme involves that use of a renewable natural resource (water) for the generation of electricity.

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

The operation of the Tekapo Power Scheme is critical to achieving New Zealand's climate change aspirations, including the aspirations of Electrify NZ, and the new coalition Government's commitment to double the overall volume of electricity from renewable sources by 2050.

Constructing the alternative generation sources to replace the Tekapo Power Scheme output would take time, likely creating a need for increased thermal generation in the meantime. The annual costs for that generation would be approximately \$160-\$310 million per year and would significantly raise New Zealand's greenhouse gas emissions, by the equivalent of 400,000 to one million cars per year while it was operating.

Even relatively small losses from the Tekapo Power Scheme (such as by way of minimum flows in the Tekapo River or a more restrictive lake level operation) can result in large cumulative losses in renewable generation and storage flexibility, particularly in light of the fact that the Tekapo Power Scheme contributes water to three downstream power stations (Ohau A, B and C) owned by Meridian Energy.

As above, the Tekapo Power Scheme (as part of the Waitaki Power Scheme) is recognised in clause 3.31 of the NPSFM. Clause 3.31(2) states that:

"When implementing any part of this National Policy Statement as it applies to an FMU or part of an FMU affected by a Scheme, a regional council must have regard to the importance of the Scheme's:

- (a) contribution to meeting New Zealand's greenhouse gas emission targets; and
- (b) contribution to maintaining the security of New Zealand's electricity supply; and
- (c) generation capacity, storage, and operational flexibility."

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

The operation of the Tekapo Power Scheme involves mitigation of some adverse flood effects in the Takapō / Waitaki River catchments by enabling retention of water in Lake Takapō and management of flood flows through the power scheme facilities.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

The Tekapo Power Scheme generates electricity from a renewable energy resource and therefore assists with addressing climate change as a significant environmental issue at a national and regional scale in New Zealand. The Scheme is a long-term investment spanning several generations and will continue to provide benefits by avoiding greenhouse gas discharges from alternative electricity generation options. The contribution of renewable electricity generation towards addressing the effects of climate change plays a vital role in the wellbeing of New Zealand, its people and the environment.

The actual and potential effects associated with the activities that are the subject of the resource consent applications have been considered in accordance with section 104(1)(a) of the RMA. The agreement with Ngā Rūnanga includes measures to address matters of concern to Ngā Rūnanga. The agreement with the Department of Conservation includes provision for the continuation of and increased funding for an indigenous biodiversity enhancement programme to work towards improving the condition, resilience, native biodiversity, ecological processes and other values of the braided rivers and associated environment within the Waitaki Catchment.

The conditions proposed by Genesis, and generally agreed with the parties that have provided written support for the applications, mean that any more than minor adverse effects generated by the proposal will be appropriately avoided, mitigated or compensated for. The assessments conclude that with the measures proposed by Genesis, the continued operation of the Tekapo Power Scheme can be undertaken in a manner that will sustain (and in many instances, enhance) the current environmental values of the waterbodies influenced by the Scheme.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

In the Waitaki Catchment, the provisions of the NPSREG, the Canterbury Regional Policy Statement and the objectives and policies of the Waitaki Catchment Water Allocation Regional Plan all confirm that substantial weight should be afforded to providing for the flow and allocation requirements of the Tekapo Power Scheme as sought in the resource consent applications. The provisions of the Waitaki Catchment Water Allocation Regional Plan recognise that achieving a sustainable management outcome in the Waitaki Catchment may involve effects on some other values but assign a controlled activity status for resource consents for the continued operation of the Tekapo Power Scheme.

The Canterbury Land and Water Regional Plan recognises the national benefits of existing hydro-electricity generation by considering their associated water takes, use, damming, diverting and discharge of water as part of the existing environment. The controlled activity status in the Plan for discharge consents provides for the ongoing operation of the Tekapo Power Scheme.

The resource consents sought by Genesis provide for continuation of the existing environment as provided for under the Waitaki Catchment Water Allocation Regional Plan and recognised in the Canterbury Land and Water Regional Plan policies and are therefore not inconsistent with the regional planning instruments.

Anything else?

Please write your answer here:

Genesis applied for the controlled activity resource consents required for the ongoing operation of the Tekapo Power Scheme in July 2023. The comprehensive applications were supported by:

1. A detailed assessment of environmental effects;

2. Nineteen appendices including:

- a. A Treaty Impact Assessment prepared on behalf of Te Rūnanga o Moeraki, Te Rūnanga o Waihao and Te Rūnanga o Arowhenua;
- b. Letters of support from Waitaki Rūnaka (Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki) and Te Rūnanga o Ngāi Tahu;
- c. A memorandum setting out what constitutes the existing environment for the purposes of section 104(1)(a) of the RMA, and the response from Canterbury Regional Council agreeing with the assessment;
- d. A report setting out the electricity sector benefits of the Tekapo Power Scheme;
- e. Proposed consent conditions;
- f. Information regarding titles, easement deeds and Statutory Acknowledgements;
- g. A landscape and visual assessment;
- h. A hydrological and hydrogeological assessment;
- i. Aquatic and native fish assessments;
- j. An assessment of lakeshore and geomorphological processes;
- k. A review of terrestrial invertebrate information relevant to the Tekapo Power Scheme;
- l. A herpetofauna effects assessment;
- m. An assessment of avifauna effects;
- n. A description of the ecological context of the Tekapo Power Scheme, including vegetation present in the braided rivers, wetlands and lake edge associated with the scheme and the potential management options which would benefit indigenous vegetation in the area;
- o. A review of the recreation and tourism values of the area and the degree to which the operation of the Tekapo Power Scheme has influenced these;
- p. A review of the Canterbury Regional Policy Statement, the Waitaki Catchment Water Allocation Regional Plan and the Canterbury Land and Water Regional Plan; and
- q. Letters of support from the Department of Conservation and Mount Cook Alpine Salmon (further written approvals were subsequently received from the Commissioner of Crown Lands (LINZ), Central South Island Region Fish and Game and Mackenzie District Council).

The applications have not been publicly notified and Genesis is presently responding to a detailed 16 page request for further information under Section 92 of the RMA from Canterbury Regional Council.

While Genesis wishes to use the Fast Track Approvals process and seeks Schedule 2A listing it must retain flexibility as to process until the final timing and details of the legislation has been confirmed. There are two significant issues in particular (both of which Genesis has submitted on in relation to the Bill). The first is timing. Genesis' consents expire on 30 April 2025. Should there be delay in enacting the Bill beyond what seems likely (or other such technical issue) such that Genesis is unable to continue to operate the scheme under s124 of the RMA or that the protections under s124 of the RMA are at risk, Genesis must have the ability to stay with the existing (2 stage or direct referral) options. The second is controlled activity status. Under the RMA Genesis' consents cannot be declined. Under the Bill they can be. Genesis needs the flexibility to consider its position if this likely unintended consequence remains in the Act.

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

No

If yes, please explain:

The Tekapo Power Scheme infrastructure is designed to specific criteria and standards to limit the effects of flood events or seismic events and is maintained and continually assessed against performance criteria (as part of a process safety framework). Water flows through the Tekapo Power Scheme (and associated lake levels) may be affected by climate change but the scheme itself will not be affected by climate change.

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

Genesis is committed to ensuring that environmental, social and cultural awareness and responsibility are cornerstones of the company's business activities and that a duty of care towards people, communities and the environment is exercised at and around its assets. The company achieves this by implementing an Environmental Management System that aligns with core company values. Genesis seeks full regulatory compliance as a minimum standard and publicly reports on its environmental performance.

Genesis' activities are monitored regularly by the relevant regulatory authorities and Genesis has a history of very high environmental compliance, with no environmental enforcement actions having been taken against it.

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Ellie Watson

Important notes