



ENVIRONMENT AND CONSERVATION ORGANISATIONS of NZ Inc.

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18 December 2008

Board of Inquiry for the proposed National Policy Statement for Renewable Electricity Generation

Board of Inquiry
c/o PO Box 10362,
WELLINGTON 6143

Email: renewable.electricity@mfe.govt.nz.

FURTHER SUBMISSION ON PROPOSED NATIONAL POLICY STATEMENT FOR RENEWABLE ELECTRICITY GENERATION UNDER RESOURCE MANAGEMENT ACT 1991

From: Environment and Conservation Organisations of NZ Inc
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1 Introduction

The Environment and Conservation Organisations of New Zealand (ECO) is the national alliance of 63 organisations with a concern for the environment and conservation, including sustainable development. ECO was established in 1972.

This submission is made with the authority of the Environment and Conservation Organisations of New Zealand Executive Committee and is compliant with our existing policies and constitution.

2. Issues in supporting or opposing submissions

ECO notes the development of a National Policy Statement for Renewable Electricity Generation.

ECO supported New Zealand ratifying the Kyoto Protocol and the UN Framework Convention on Climate Change and taking serious action to make large cuts in our greenhouse gas emissions.

ECO's approach in making further submissions on this NPS are:

- ECO supports the objective of the NPS of “ 90 per cent of New Zealand’s electricity will be generated from renewable sources by 2025”. This policy is consistent with the New Zealand Energy Policy and is a practical objective and consistent with the purpose of the RMA.
- ECO support the concept that not all ‘renewable generation’ is created equal in terms of its effects upon the natural environment including the “relative degree of reversibility of the adverse environmental effects associated with proposed generation technologies.” (Policy 4)
- ECO recognises that the impacts of global warming, including acidification of our seas and sea level rise, needs to be taken seriously by all decision makers under RMA. This is consistent with the purpose and principles of the Act, especially section 7(i) and the matters to be considered in section 45(2) including (b) and (g). These issues include New Zealand’s obligations under the UN Framework Convention on Climate Change and the Kyoto Protocol. Appendix I set out some of the conclusions from the latest IPCC reports.
- ECO recognises that there are limits to production of renewable energy (eg sites) and that any consideration should include recognition of the need to develop policies and plans under the RMA which result in the more efficient use of energy. This recognises the finite characteristics of natural and physical resources (s7(g)) and the efficiency of the end use of energy (s7(ba)).
- ECO supports appropriate measures for distributed generation, particularly within a region. (eg elements of policy 5). This also recognises the finite characteristics of natural and physical resources (s7(g)) and the efficiency of the end use of energy (s7(ba)).

3. Submissions:

Submitter:

79 [Royal Forest & Bird Protection Society Inc.](#)

Provisions supports or opposed

ECO supports this submission in total.

Reasons for support or opposition including details:

ECO considers this submission recognises the issues set out in section 2 above.

The proposals made are consistent with the purpose and principles of the RMA and the purpose of National Policy Statements (s 92).

ECO seek that the whole (or part) of the submission be allowed/disallowed

ECO seeks the submission to be allowed in whole and in particular the proposal to include a policy for “Effective Consultation and Planning Management” of any energy proposal.

Submitter:

102 [Wild Rivers Action Project](#)

Provisions supports or opposed

ECO supports this submission.

Reasons for support or opposition including details:

ECO considers this submission recognises the issues set out in section 2 above. This includes recognition that hydro electricity sites are finite and agree that “there are significant national costs such as impact on biodiversity, and the loss of wild rivers, and the amenity values of South Island rivers that need to be considered in policy”.

The proposals made are consistent with the purpose and principles of the RMA and the purpose of National Policy Statements (s 92).

ECO seek that the whole (or part) of the submission be allowed/disallowed

ECO seeks the submission to be allowed and in particular the proposal to configure an energy proposal in a way to:

- “minimise ecological impacts”;
- “recognises the cultural, recreational and ecological values that NZers place on wild outdoor places, and the access and recreation opportunities in them”
- “there are significant national costs such as impact on biodiversity, and the loss of wild rivers, and the amenity values of South Island rivers that need to be considered in policy”.

The proposals made are consistent with the purpose and principles of the RMA and the purpose of National Policy Statements (s 92).

Submitter:

112 [Fish and Game New Zealand](#)

Provisions supports or opposed

ECO supports this submission in part. ECO supports:

- Recognition that some renewable resources have finite characteristics (eg that “the actual number of rivers from which hydro energy may be generated is finite”) – paras 3 and 4.
- Proposals to amend policy 1 to recognise the need to consider the environmental effects of renewable energy generation (para 39).
- Proposal to amend or delete policy 2 (para 41 and 42);
- Proposal to amend policy 3 to strengthen this policy to “give clear priority in favour of more reversible projects”.
- Proposals to amend policy 4 to recognise that any site identified may conflict with other “nationally or regionally significant resources” eg biodiversity, amenity values, etc.
- Proposal to amend policy 5 to “consider” small and community-scale distributed renewable energy generation”.

Reasons for support or opposition including details:

ECO considers this submission recognises the issues set out in section 2 above. This includes recognition that hydro electricity sites are finite.

The proposals made are consistent with the purpose and principles of the RMA and the purpose of National Policy Statements (s 92).

ECO seek that the whole (or part) of the submission be allowed/disallowed

ECO seeks the submission to be allowed in part to:

- Recognition that some renewable resources have finite characteristics (eg that “the actual number of rivers from which hydro energy may be generated is finite”) – paras 3 and 4.
- Proposals to amend policy 1 to recognise the need to consider the environmental effects of renewable energy generation (para 39).
- Proposal to amend or delete policy 2 (para 41 and 42);
- Proposal to amend policy 3 to strengthen this policy to “give clear priority in favour of more reversible projects”.
- Proposals to amend policy 4 to recognise that any site identified may conflict with other “nationally or regionally significant resources” eg biodiversity, amenity values, etc.
- Proposal to amend policy 5 to “consider” small and community-scale distributed renewable energy generation”.

The proposals made are consistent with the purpose and principles of the RMA and the purpose of National Policy Statements (s 92).

Submitter:

51 [Ecologic](#)

Provisions supports or opposed

ECO supports this submission in part. ECO supports:

- The proposed change to the Objective;
- The support for policy 3.
- Deletion of the definition of “renewable electricity generation activities,” and those sections of the document where that terms appears.

Reasons for support or opposition including details:

ECO considers this submission recognises the issues set out in section 2 above.

The proposals made are consistent with the purpose and principles of the RMA and the purpose of National Policy Statements (s 92).

ECO seek that the whole (or part) of the submission be allowed/disallowed

ECO seeks the submission to be allowed in part to:

- To amend the Objective so that, in addition to reducing greenhouse gas emissions, the objective recognises the carbon footprint of energy generation;
- Support policy 3.
- Deletion of the definition of “renewable electricity generation activities,” and those sections of the document where that terms appears.

The proposals made are consistent with the purpose and principles of the RMA and the purpose of National Policy Statements (s 92).

Submitter:

50 [Auckland Conservation Board](#).

Provisions supports or opposed

ECO supports this submission in part. ECO supports:

- The addition of: the words “*at an appropriate scale with due regard for the wider ecosystem, local community and iwi concerns*” should be added.
- That any application for electricity generation (aside from micro scale units to support huts, visitor facilities or scientific installations) should not be allowed in or near a Marine Mammal Sanctuary, Marine Reserve, National Park, Conservation Stewardship Area or any intercoastal area where migratory birds feed, in the flight path of migratory birds, or in the main entrance channel to harbours where marine mammals and elasmobranchs (sharks and rays) may feed or breed.

Reasons for support or opposition including details:

ECO considers this submission recognises the issues set out in section 2 above. This includes recognition of the importance of public consultation and the importance of conservation land and marine protected areas.

The proposals made are consistent with the purpose and principles of the RMA and the purpose of National Policy Statements (s 92).

ECO seek that the whole (or part) of the submission be allowed/disallowed

ECO seeks the submission to be allowed in part to:

- Add to policy 1(ii) the addition of: the words “*at an appropriate scale with due regard for the wider ecosystem, local community and iwi concerns*” should be
- Add to policy 2 to ensure that any application for electricity generation (aside from micro scale units to support huts, visitor facilities or scientific installations) should not be allowed in or near a Marine Mammal Sanctuary, Marine Reserve, National Park, Conservation Stewardship Area or any intercoastal area where migratory birds feed, in the flight path of migratory birds, or in the main entrance channel to harbours where marine mammals and elasmobranchs (sharks and rays) may feed or breed.

The proposals made are consistent with the purpose and principles of the RMA and the purpose of National Policy Statements (s 92).

3.0 ECO wishes to be heard in support of this further submission

ECO seeks to be heard in Wellington.

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

Address for service:

Environment and Conservation Organisations of New Zealand,
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04-385-7545
Contact Amelia Luxton.

Yours sincerely

Barry Weeber
Co-Chairperson

Appendix I: Background: The Need for Action

The threat of anthropogenic climate change is unprecedented in terms of the severity and broad scope of the potential global impacts, the large geographical and temporal scale of the problem, and the complexity of the social, political and economic issues involved. Climate change is itself not an isolated issue: it is intimately bound up with the threat of global environmental change more generally.

There is scientific consensus that human activities are affecting the global climate system, and a political consensus that current international commitments under the Framework Convention on Climate Change (FCCC) are inadequate to achieve the convention's objective of preventing "dangerous anthropogenic interference" with the climate system.

The latest IPCC Assessment

The latest assessment of the Inter-governmental panel on climate change (IPCC) review includes so key issues. Assessment of recent trends is an:

- Increase in CO₂ from 280ppm to 379ppm;
- Increase in methane from 715ppb to 1732ppb
- Both are well above levels for the last 650,000 years
- Increase in nitrous oxide from 270ppb to 319ppb
- 11 of the last 12 years rank amongst the warmest 12 years since 1850;
- Increase in temperature of 0.76oC since 1850
- Decline in glaciers and snow cover;
- Faster rate of sea-level rise since 1993;
- Last time polar regions were significantly warmer was 125,000 years ago when sea level was 4-6m higher.

Changes predicted and reductions needed:

- Warming of 0.2oC per decade;
- Best estimate warming of 1.8 to 4.0oC with likely range up to 6.4oC;
- Best estimate increase in sea level of 0.18m to 0.59m by 2100 [but these are conservative];
- Increasing acidification of the oceans with pH reduction of 0.14 to 0.35 by 2100
- Contraction in snow cover and sea ice with possible total loss of late summer Arctic sea ice
- Large reduction in GHG emissions required

Every year there is a range of climatic changes that are consistent with climate destabilisation. These include outbreaks of pests and diseases, increasingly intense storms and droughts, melting ice sheets, bleaching coral reefs, warmer surface temperatures, and changes in the level, salinity and density of ocean waters, acidification of the oceans. This warm weather is impacting on the ecology and weather of the planet.

While New Zealand has suffered droughts and heavy rainfall events, coral reefs have suffered from elevated temperatures. Coral reefs throughout the world suffered from severe bleaching which has been linked to global warming. Elevated temperatures are the consistent cause of coral reef bleaching leaving dead or damaged corals.

According to the US National Oceanic and Atmospheric Administration (NOAA) coral bleaching was observed in over 60 countries in the Indian and Pacific Oceans, Caribbean, Persian Gulf and the Red Sea.

Inter-governmental Panel on Climate Change has calculated that to stabilise concentrations at 1990 levels, global carbon dioxide emissions would need to be cut more than 60%. The Kyoto

Protocol emission reduction target of an average of 5% for Annex I Parties [OECD countries including New Zealand] for the first 5 year target (2008-2012) will, therefore, go a small way towards stabilising concentrations and start movement towards reducing emissions over the next 45 years.

Reduction in New Zealand's emissions are important given our relatively high emissions on a per capita basis, therefore we need to take a responsible attitude to reduce emissions. [reference and specifics]

Appendix II Why New Zealand globally need to take action on climate change

New Zealand needs to take action on climate change for a range of reasons including:

- Acknowledging that significant reductions will be required. The Inter-governmental Panel on Climate Change has calculated that to stabilise concentrations at 1990 levels, global carbon dioxide emissions would need to be cut by more than 60%, methane by 15 to 20% and nitrous oxide by 70 to 80%.
- **Need to set an example internationally:** New Zealand needs to set an example to other countries as part of its policies and their implementation.
- **The application of the precautionary approach** to scientific uncertainty of environmental harm.
- **International Credibility:** The principle of international credibility is very important and New Zealand has an opportunity to set an example and lead the Umbrella Group down a proactive path.
- **Equity:** Climate policy must be equitable both internationally and domestically, inter- and intra-temporally and between humans and non-humans. International equity is the motivating force for the requirement for developed countries “to take the lead” as pronounced in the Framework Convention for Climate Change. The polluter pays principle should be adopted.
- It is important for the New Zealand government to be mindful of its geographic and political location in the neighbourhood of small South Pacific Island states. Diplomatically we have some obligation to further their interests.
- Recognition that New Zealand’s per-capita emissions are high on a world scale. New Zealand has the fourth largest emissions of greenhouse gases per capita for Annex I countries (1998), exceeded only by Canada, the USA and Australia.
- **Obligations to future generations:** New Zealand has an obligation to future generations of New Zealanders and, as a global citizen, to where possible, avoid the impacts of climate change and further mitigate the effects of climate change.
- **Obligations to other species:** New Zealand has an obligation to reduce the effect of climate change on other species, in particular indigenous species, by reducing emissions.