



**The Sustainable Energy Forum Inc.**

P O Box 11 152, Wellington  
Email: [info@sef.org.nz](mailto:info@sef.org.nz)  
Web: <http://www.sef.org.nz>

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

*In accordance with section 49 of the Resource Management Act 1991*

**To** the Chairperson  
Board of Inquiry

This is a submission on the (following) proposed national policy statement for renewable electricity generation (the proposal) that was publicly notified on 6 September 2008.

The specific provisions of the proposal that my submission relates to are:

The policy as a whole, Policy 1, Policy 4 and Policy 5.
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Our submission is:

<p>The Sustainable Energy Forum (SEF) supports the introduction of the National Policy statement on Renewable Energy Generation.</p>
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<p>SEF supports the introduction of the NPS because it aligns with our objectives. The objective of the Sustainable Energy Forum (SEF) is to "facilitate the use of energy for economic, environmental and social sustainability". SEF is a group of individuals and organisations interested in promoting information and supporting action that will help move New Zealand towards a sustainable energy future. SEF has a membership of around 12 corporate and 150 individual members, including people with a personal interest in sustainable energy, staff involved in small-scale energy supply and energy efficiency businesses, energy and policy consultants, staff in tertiary education and research institutions, and in large organisations including major energy companies. See <a href="http://www.sef.org.nz">www.sef.org.nz</a> for further information.</p>
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<p>SEF supports the introduction of the NPS because SEF believes there is a large future for small embedded electricity generation and that there are several institutional barriers to entry for these systems of which the RMA is only one. [The two most important barriers being, the lack of a competitive retail market for electricity generation and existing disincentives for lines companies to connect independent generators to their networks.]</p>
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<p>SEF believes the NPS does not go far enough in that it may not weigh the impacts of climate change on the environment highly enough. SEF recognises these are difficult to quantify; however, a one metre sea level rise will have a huge environmental impact. Widespread species extinction will also have a huge environmental impact.</p>
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SEF strongly agrees with the first part of the preamble about the importance of meeting growing electricity demand and importance of reducing greenhouse gas emissions. The likely increase in oil and gas prices going forward will lead to an increase in the use of electricity for both public and private transport. This is likely to further increase demand for electricity from renewable sources above that forecast in the New Zealand Energy Strategy.

SEF recognises the need to balance local adverse impacts with national and international benefits; however SEF also believes that the RMA as it stands may place too much emphasis on the adverse local impact on the present generation and not enough emphasis on the national costs and global impacts to future generations. In particular SEF notes that future generations cannot be represented in the Environment Court.

We seek the following changes to the proposal:

SEF believes the wording of Policy 4 is too vague and unclear about what Councils are supposed to do. We submit that it would be better to develop one statement that all Councils could use rather than ending up with different statements in every plan.

We do not wish to be heard in support of our submission.

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Signature of submitter (or person authorised to sign on behalf of submitter)

Date: 31 October 2008

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

Address for service of submitter:	Sustainable Energy Forum Inc P O Box 11 152, Wellington
Telephone:	
Fax/email:	Convenor <a href="mailto:convenor@sef.org.nz">convenor@sef.org.nz</a>
Contact person: [ <i>name and designation, if applicable</i> ]	Ian Baxter Member of the SEF Executive