

Further Submission in opposition to TrustPower's Submission No 94 on Reversibility.

My name is Hugh Steadman. I own and manage a distilling company in Blenheim. I am here in my role as Chairman of Save the Wairau River Inc. Our society has been formed to ensure the survival and sustainable management of the Wairau River and its tributaries for the long term benefit of present and future generations of the residents of Marlborough. I have been asked to register the Society's strong objection to TrustPower's submission No 94 in which it argues that the insistence on reversibility is unnecessary.

One of the current threats facing the Wairau River, is a TrustPower proposal to divert 60% of its average annual flow into a large trench running for forty-seven kilometres along the hillside above State Highway 63 and interspersed with five power stations. This is a major infra-structure project costing between an estimated \$280 million to a more reasonable estimate of up to \$400 million – all for a generation capacity of just 72 megawatt. Given the uncertainties of the effects of climate change on river flows, possible changes to Carbon Trading legislation and the market consequences of technological advances in alternative generation and distribution technology, it could well be that this project might start to operate at a loss before the end of its anticipated life-span.

The economics of going ahead with this scheme would become far harder to justify were reversibility to be a necessary condition built into TrustPower's Resource Consents. Firstly and most obviously, they would have to pay the cost of filling in the trench and removing all structures in order to restore landscape values and rights of access. Secondly they would have to attempt to restore the wildlife and the trout fishery both of which are likely to have been severely disrupted if not totally destroyed. It is absurd to imagine the removal of 60% of a rivers' median flow without a significantly more than minor impact on the ecosystems it supports. Not all impacts on ecosystems are reversible – the Newfoundland cod fishery providing a salutary example in this respect. Thirdly, there are other, as yet unknown and unquantifiable adverse effects.

As CEO of a distillery, which makes a gin which, last year, won the only platinum medal awarded at the USA's largest spirit competition, I have particular worries in this area of unknowns. The gin depends on water from the Blenheim aquifer. TrustPower plans to remove weed build up from its conduits and installations using a herbicide – residues of which will inevitably end up in the aquifer. Irrespective of any public health issue, which might sooner or later arise, given current trends in market perception, it could well be that, in a decade or two's time, these trace residues will be a cause of embarrassment. The marketing damage to our company, as food and beverage manufacturers, and to others, such as the wine industry, who rely on the Marlborough aquifer for irrigation or food preparation may well be irreversible. Were a real long-term public health issue also to emerge, how would the residues be removed from the aquifer?

Our society's contention is that, unless there are cast iron guarantees that an entity proposing to undertake a potentially hazardous step, has the financial and technical capability and the legally enforceable responsibility to reverse the steps taken, any move that might jeopardise the sustainability of natural and physical resources, should not be permitted. In general, the larger and more costly the project; the larger the risk of unforeseen consequences and the greater the cost of reversal. Insistence on reversibility will greatly encourage the development and adoption of cheaper, less hazardous, readily reversible and widely distributed alternative generation technologies and of the administrative infrastructure to enable their deployment.

I would like to finish my submission by quoting Section 5 of the Resource Management Act.

Purpose

5.

- (1) The purpose of this Act is to promote the sustainable management of natural and physical resources.
- (2) In this Act, *sustainable management* means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while—
 - (a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
 - (b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
 - (c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.

It would seem clear to me from reading Section 5.s.c.) above that either the Act has to be changed to omit the word “remedying” or else this Commission has no choice but to insist on the retention of reversibility as a key parameter in the granting of any power generation proposal.

Thank you.

Hugh Steadman, for Save the Wairau River Inc.

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