



meridian

SUBMISSION ON PROPOSED ENVIRONMENTAL REPORTING BILL

To: The Ministry for the Environment
PO Box 10362
Wellington 6143

and

by email:

Name of Submitter: Meridian Energy Limited (Meridian)

Introduction

Meridian operates seven hydro stations and four wind farms in New Zealand. Additionally, Meridian either has, or is in the process of seeking, resource consents to build and operate a further 8 generation assets. These potential and existing assets are situated within seven different regional council areas.

Meridian undertakes extensive monitoring of the environment as part of its consenting requirements, including considerable base line environmental monitoring when seeking consent to build and operate new generation assets, and monitoring consented operations.

Comments on discussion document

In response to the specific matters in the discussion document Meridian

1. Supports the objective to identify an independent agency to report regularly on the state of the environment.
2. Supports the proposal to give the Parliamentary Commissioner for the Environment (PCE) an explicit role under the Environment Act 1986 by requiring 5 yearly reports on the state of the Environment.
3. Considers the following factors relevant to this proposal
 - a) A 5 year reporting time frame is arguably too infrequent, however recognising the time and expense to compile such a report, this time frame is supported.
 - b) As noted in the PCE's submission on the submission document, resourcing will be required to carry out the function effectively.
4. Supports the objective to ensure high quality environmental statistics are available to underpin state of the environment reporting and environmental policy-making.
5. Supports the proposed approach to expand the regulation-making powers under section 360 of the Resource Management Act 1991 to improve the consistency of state of the environment monitoring statistics at the local level.
6. Considers the following factors relevant to this proposal

- a) There are a number of monitoring roles requiring different information, for example
 - i. State of environment reporting
 - ii. Environmental policy-making
 - iii. The effectiveness and efficiency of plans and policy statements
 - iv. Consent conditions compliance
 - b) Provision of an overarching and robust national framework to identify the interrelationships and parameters for data necessary to fulfil each of these roles would provide certainty and efficiencies.
 - c) The development of any Environmental Reporting Bill should comprehensively address the changes in roles and increased costs to those involved, particularly local authorities.
 - d) Meridian is committed to monitoring the effects of our activities and exercising our consents in line with agreements to operate. Meridian's hydro facilities operate at such a scale and collect such large amounts of data, which benefits regional councils and other parties, that the collection of data for state of the environment reporting should not be inequitable. If there is a clear causation relationship to the need for the data collection linked to a consent holder, then an equitable apportionment to that consent holder could be considered. If there are instances where data collection can be aligned for multiple purposes this should be clearly identified.
 - e) Where there is a more general requirement for information to contribute to state of the environment reporting, the costs should be attributed to a wider constituency through a method such as a general or targeted tax or rate. In a local authority context, the cost recovery model used by Environment Canterbury is an example of this approach.
7. Meridian wishes to be heard and attend the symposium to be held in February 2012 to publicly discuss in detail any new regulations which might be made under the proposed RMA changes of the Environmental Reporting Bill.

Dated this 18th day of October 2011

Signed for and on behalf of Meridian Energy Limited

Address for service of submitter:

Meridian Energy Limited
25 Sir William Pickering Drive
PO Box 2454
Christchurch