



**Proposed Amendments to the National Policy Statement for
Freshwater Management 2011
Discussion Document**

To: Freshwater Reform
Ministry for the Environment
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By email: watersubmissions@mfe.govt.nz

Submission on: Proposed Amendments to the National Policy Statement for
Freshwater Management 2011 – Discussion Document

Name: Pioneer Generation Limited

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Signature: 

Date: 4th of February 2014

1.0 INTRODUCTION AND OVERVIEW

Pioneer Generation Limited (hereafter referred to as '**Pioneer**') is a community owned energy business with its origins firmly based in Central Otago. The Company is 100 percent owned by the Central Lakes Trust. With over 80 years of electricity generation experience, Pioneer has expanded its customer base by owning and managing a diverse portfolio of renewable energy investments across New Zealand.

With hydroelectric power generation stations, wind farms, landfill gas engines, boiler plant and waste to energy solutions, heat energy, wood fuel supply logistics and energy efficiency sales in both North and South Islands, Pioneer services the energy supply needs of some of New Zealand's leading primary producers and exporters, hospitals, tertiary institutions, councils and commercial service providers from its unique range of renewable energy options.

Pioneer owns and operates twelve hydroelectric power generation schemes, which it considers to be 'small-scale'. These schemes range in size from 400kW to 7.6MW and are located in Central Otago and Southland where they are embedded within the local distribution networks. The Company also has two small wind farms, the most recent being the Mt Stuart Wind farm located within the Clutha District. Pioneer is continuously looking for new development opportunities and ways in which to enhance its existing hydroelectric power generation schemes.

This submission is made to the '*Proposed Amendments to the National Policy Statement for Freshwater Management 2011: A Discussion Document*' (hereafter referred to as the '**Discussion Document**'). Pioneer is aware that this consultation process seeks to inform the proposed amendments to the National Policy Statement for Freshwater Management 2011 (hereafter referred to as the '**NPS FM 2011**'). The Company records that it wishes to be involved with all (currently proposed and future) amendments of the NPS FM 2011.

2.0 STRUCTURE OF SUBMISSION

Pioneer is generally supportive of the intention of the amendments proposed in the Discussion Document. The Company notes that the proposed amendments aim to make the NPS FM 2011 more effective and to improve the way in which freshwater is managed in New Zealand. The amendments proposed build on the recommendations of the Land and Water Forum and are intended to ensure that regional councils account for all water takes and sources of contaminants, in order to inform decisions on the setting of freshwater objectives and limits. While Pioneer supports the aim or intent of the proposed amendments, the Company has a number of concerns and points of clarification that it considers must be addressed before amendments to the NPS FM 2011 are advanced. Further Pioneer considers that the Water Research Strategy, Resource Management Act 1991 (hereafter referred to as the '**RMA**' or '**the Act**') Reforms, amendments proposed within the Discussion Document and national guidance material prepared to support the same, should be

advanced together, in order to provide clarity, and ensure that all of the various documents, policies and proposed changes, fit together cohesively.

Pioneer's specific points of submission are included within **Table A**, which is attached within **Appendix One**. In this regard, Table A identifies one general submission point and seven points of submission which relate to the specific amendments proposed within the Discussion Document, and freshwater management more generally. These are:

- 1: *The Importance of Adequate Consultation;*
- 2: *Accounting for Water Quality and Quantity;*
- 3: *A National Objectives Framework;*
- 4: *Setting Compulsory National Values;*
- 5: *Setting National Bottom Lines;*
- 6: *Exceptions to the National Bottom Lines;*
- 7: *Articulating Tangata Whenua Values; and*
- 8: *Monitoring.*

3.0 SUMMARY

In summary, Pioneer supports the overall intent of the amendments proposed within the Discussion Document, which seek to make the NPS FM 2011 a more effective document and to improve the way that freshwater is managed in New Zealand. As outlined in the Company's submissions, while Pioneer agrees that the NPS FM requires amendment, the Company has concerns with some aspects of the proposed amendments and the implications that they may have on the Company. Overall, Pioneer considers that a number of the amendments require clarification, additional thought and refinement, and consideration of the appropriate time for implementation, as set out in the submissions included within Table A (within **Appendix One**). Further, Pioneer considers that it is crucial that all of the freshwater reforms currently being progressed should be advanced together as a package, so as to ensure that they fit together cohesively.

Pioneer would be happy to meet with the Ministry for the Environment to discuss the points raised within its submission, or any questions, or queries the Ministry might have, regarding the same. Please do not hesitate to contact the undersigned to arrange such a meeting. Further, and as set out within this submission, Pioneer wishes to be involved with all (currently proposed and future) amendments of the NPS FM 2011.

Yours faithfully



[withheld]

Pioneer Generation Limited

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