

9 April 2025

**Fast Track**

Private Bag 63002  
WELLINGTON 6140

From: Ben Williams / Rachel Robilliard  
Direct: +64 3 353 0343 / +64 3 353 1234  
Mobile: +64 27 469 7132 / +64 27 320 3446  
Email: ben.williams@chapmantripp.com /  
rachel.robilliard@chapmantripp.com  
Ref: 100678102/3457-7568-8505.1

**GENESIS ENERGY LIMITED - APPLICATION UNDER FAST TRACK APPROVALS ACT**

- 1 We act for **Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki** (collectively referred to as *Waitaki Rūnaka*) in relation to the applications by Genesis Energy Limited (*Genesis*) under the Fast-track Approvals Act 2024 (*Fast-track Act*) for replacement consents to operate the existing Tekapō Power Scheme.
- 2 Waitaki Rūnaka previously provided three separate letters to Canterbury Regional Council in June 2023 in relation to the replacement resource consent applications by Genesis, which are included as **Attachments 1-3** to this letter. As those letters explain, Waitaki Rūnaka understand that the replacement consents will enable the continued operation of the Takapō Power Scheme for a 35-year term that no material changes to the current activities and existing consent flexibility the Takapō Power Scheme are proposed.
- 3 The purpose of this letter to confirm that the Waitaki Rūnaka continue to support the applications made by Genesis under the Fast-track Act.
- 4 Waitaki Rūnaka have recognised the significance of the waters of the Waitaki alongside the significance of the hydro electricity generation to the nation and adopted an intergenerational approach to protecting the health and well-being of the Waitaki Catchment. Waitaki Rūnaka have therefore worked collaboratively with the Genesis to develop a package that includes:
  - 4.1 conditions that are to be attached to the resource consents;
  - 4.2 a mitigation package for the duration of the consents;
  - 4.3 an enhanced relationship agreement between Genesis/Meridian and Ngā Rūnaka; and
  - 4.4 a suite of measures (including financial) that further provide for the management of adverse effects on Ngā Rūnaka with this Ngāi Tahu taonga.
- 5 The four components of this package recognise that restoration of the Waitaki Catchment requires time, capacity, commitment, collaboration and importantly resourcing. This approach recognises our rangatiratanga over the Waitaki Catchment and its taonga, including wai māori, and enables greater economic, spiritual and cultural connections for mana whenua.



- 6 Waitaki Rūnaka support extends to the application made under the Fast-track Act, on the basis that the reasons for support outlined in paragraphs 4 and 5 above remain unchanged.
- 7 Waitaki Rūnaka expect to be invited to provide comments on the application under section 17 of the Fast-track Act. In this respect, please note that this letter is not an affected party approval for the purposes of either sections 95A or 95B of the Resource Management Act 1991.
- 8 Furthermore, in relation to the report on Treaty settlements and other obligations required under section 18 of the Fast-track Act (and as explained in the letter from Te Rūnanga o Ngāi Tahu), Waitaki Rūnaka expect that the responsible agency will work with Ngāi Tahu in preparing the report and will reflect the clearly articulated position of Ngāi Tahu recorded in the Treaty Impact Assessment 2023.

Nā māua noa, nā

 R E Robilliard

Ben Williams / Rachel Robilliard

Partner / Senior Associate



# Attachment 1

## Te Rūnanga o Arowhenua Inc Soc.

38 Huirapa Street

Temuka

P 03 615 9646

E [Arowhenua.admin@ngaitahu.iwi.nz](mailto:Arowhenua.admin@ngaitahu.iwi.nz)

23 June 2023

Canterbury Regional Council  
200 Tuam Street  
Christchurch Central City  
CHRISTCHURCH 8011

Tēnā koe,

We write as rangatira of the Papatipu Runanga of Kāi Tahu whānui representing mana whenua for the Waitaki Catchment, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki (*Ngā Rūnaka*):

1. The takiwā of Te Rūnanga o Arowhenua centres on Arowhenua and extends from Rakaia to Waitaki, sharing interests with Ngāi Tuahuriri ki Kaiapoi between Hakatere and Rakaia, and thence inland to Aoraki and the Main Divide (Te Rūnanga o Ngāi Tahu (Declaration of Membership Act) Order 2001). Arowhenua marae is located near Te Umu Kaha (Temuka) and is situated near the historic Kāi Tahu kāika of Te Waiaeruati and the well-known Arowhenua bush that sustained local Kāi Tahu. Arowhenua connects ancestrally to the waka Takitimu and Ārai-te-uru, the mauka Tarahoua and the awa Waitaki and Opihi. The Kāi Tahu name for The Main Divide is Kā Tiritiri-o-te-moana.
2. The takiwā of Te Rūnanga o Waihao centres on Wainono, sharing interests with Te Rūnanga o Arowhenua to Waitaki, and extends inland to Omarama and the Main Divide (Te Rūnanga o Ngāi Tahu (Declaration of Membership Act) Order 2001). Manawhenua within the Waihao rohe whakapapa to Waitaha, Kāti Māmoe and Kāi Tahu. To these people Waihao is their tūrakawaewae; their home. The name Waihao refers to the hao eel, an important food resource obtained from the Waihao River that has its beginnings in the upland country behind the hills, Te Tari-a-Te-Kaumira (Hunter Hills). The hao eel, the life-stage of the short-fin eel, was and still is a delicacy to whanau who gather mahika kai from the Wainono Lagoon and the Waihao River.
3. The takiwā of Te Rūnanga o Moeraki centres on Moeraki and extends from Waitaki to Waihemo and inland to the Main Divide (Te Rūnanga o Ngāi Tahu (Declaration of Membership Act) Order 2001). The interests of Te Rūnanga o Moeraki are concentrated in the Moeraki Peninsula area and surrounds, including Te Rakahineatea Pā, Koekohe (Hampden Beach), and Te Kai Hinaki (the Boulders Beach) with its boulders. In addition, the interests of the Rūnaka extend both north and south of the Moeraki Peninsula, within their takiwā.

The Waitaki Catchment holds immense significance to Ngā Rūnaka. Waitaki literally means '*the waterway of tears*' and the name is often said to represent the tears of Aoraki, the ancestor of Ngāi Tahu embodied in the mountain. The wai māori of the valleys and basins of the takiwā of Ngā Rūnaka descend from Aoraki and the mauka of Te Waipounamu to the sea. The awa are the lifeblood of the surrounding land and its peoples. The catchments and streams are the veins of the

whenua; a source of nourishment, and a living system connecting the peoples of Ngāi Tahu with their ancestor, with mahika kai, with countless taonga, and with each other.

Ngā Rūnaka acknowledge the importance of hydro generation as a source of renewable energy, and the benefits it has provided to past, current and future generations.

Genesis Energy Limited (*Genesis*) is seeking replacement resource consents from the Canterbury Regional Council for the damming of the Takapō River, the taking and diversion of water from Lake Takapō and the Takapō River, and the discharge of water and associated contaminants into Lake Pūkaki and the Takapō River from Takapō Power Scheme operations. The replacement consents will enable the continued operation of the Takapō Power Scheme for a 35-year term and Ngā Rūnaka understand that no material changes to the current activities and existing consent flexibility the Takapō Power Scheme are proposed.

Meridian Energy Limited (*Meridian*) is seeking replacement consents to take, use, dam or divert water, and to discharge water and contaminants in order to operate the Ōhau A, Ōhau B, Ōhau C, Benmore, Aviemore and Waitaki Power Stations. The replacement consents will enable the continued operation of the Waitaki Power Scheme for a 35-year term and Ngā Rūnaka understand that no material changes to the current activities and existing consent flexibility of the Waitaki Power Scheme are proposed.

Ngā Rūnaka have recognised the significance of the waters of the Waitaki alongside the significance of the hydro electricity generation to the nation and adopted an intergenerational approach to protecting the health and well-being of the Waitaki Catchment. Ngā Rūnaka have therefore worked collaboratively with the Generators to develop a package that includes:

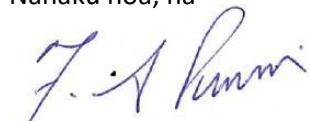
1. conditions that are to be attached to the resource consents
2. a mitigation package for the duration of the consents
3. an enhanced relationship agreement between Genesis/Meridian and Ngā Rūnaka; and
4. a suite of measures (including financial) that further provide for the management of adverse effects on Ngā Rūnaka with this Ngāi Tahu taonga.

The four components of this package recognise that restoration of the Waitaki Catchment requires time, capacity, commitment, collaboration and importantly resourcing. This approach recognises our rangatiratanga over the Waitaki Catchment and its taonga, including wai māori, and enables greater economic, spiritual and cultural connections for mana whenua.

On behalf of mana whenua, we therefore support the applications by Meridian Energy and Genesis Energy for the ongoing operation of the existing Waitaki/Takapō Power Scheme for 35 years.

We note that this letter is not an affected party approval for the purposes of either sections 95A or 95B of the Resource Management Act 1991 and Ngā Rūnaka may still seek to be submit and be heard in support of any application(s).

Nāhaku noa, nā



Fiona Pimm

Tumuaki (Chairperson)

**Te Rūnanga o Arowhenua**

# Attachment 2



Te Runanga o  
**Waihao**

Te Rūnanga o Waihao  
26 Māori Road, RD 10, Waimate 7980  
Email: waihao.manager@ngaitahu.iwi.nz  
Phone: 03 689 4726

23 June 2023

Canterbury Regional Council  
200 Tuam Street  
Christchurch Central City  
CHRISTCHURCH 8011

Tēnā koe,

We write as rangatira of the Papatipu Runanga of Kāi Tahu whānui representing mana whenua for the Waitaki Catchment, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki (*Ngā Rūnaka*):

1. The takiwā of Te Rūnanga o Arowhenua centres on Arowhenua and extends from Rakaia to Waitaki, sharing interests with Ngāi Tuahuriri ki Kaiapoi between Hakatere and Rakaia, and thence inland to Aoraki and the Main Divide (Te Rūnanga o Ngāi Tahu (Declaration of Membership Act) Order 2001). Arowhenua marae is located near Te Umu Kaha (Temuka) and is situated near the historic Kāi Tahu kāika of Te Waiaeruati and the well-known Arowhenua bush that sustained local Kāi Tahu. Arowhenua connects ancestrally to the waka Takitimu and Ārai-te-uru, the mauka Tarahoua and the awa Waitaki and Opihi. The Kāi Tahu name for The Main Divide is Kā Tiritiri-o-te-moana.
2. The takiwā of Te Rūnanga o Waihao centres on Wainono, sharing interests with Te Rūnanga o Arowhenua to Waitaki, and extends inland to Omarama and the Main Divide (Te Rūnanga o Ngāi Tahu (Declaration of Membership Act) Order 2001). Manawhenua within the Waihao rohe whakapapa to Waitaha, Kāti Māmoe and Kāi Tahu. To these people Waihao is their tūrakawaewae; their home. The name Waihao refers to the hao eel, an important food resource obtained from the Waihao River that has its beginnings in the upland country behind the hills, Te Tari-a-Te-Kaumira (Hunter Hills). The hao eel, the life-stage of the short-fin eel, was and still is a delicacy to whanau who gather mahika kai from the Wainono Lagoon and the Waihao River.
3. The takiwā of Te Rūnanga o Moeraki centres on Moeraki and extends from Waitaki to Waihemo and inland to the Main Divide (Te Rūnanga o Ngāi Tahu (Declaration of Membership Act) Order 2001). The interests of Te Rūnanga o Moeraki are concentrated in the Moeraki Peninsula area and surrounds, including Te Rakahineatea Pā, Koekohe (Hampden Beach), and Te Kai Hinaki (the Boulders Beach) with its boulders. In addition, the interests of the Rūnaka extend both north and south of the Moeraki Peninsula, within their takiwā.

The Waitaki Catchment holds immense significance to Ngā Rūnaka. Waitaki literally means '*the waterway of tears*' and the name is often said to represent the tears of Aoraki, the ancestor of Ngāi Tahu embodied in the mountain. The wai māori of the valleys and basins of the takiwā of Ngā Rūnaka descend from Aoraki and the mauka of Te Waipounamu to the sea. The awa are the lifeblood of the surrounding land and its peoples. The catchments and streams are the veins of the whenua; a source of nourishment, and a living system connecting the peoples of Ngāi Tahu with their ancestor, with mahika kai, with countless taonga, and with each other.

Ngā Rūnaka acknowledge the importance of hydro generation as a source of renewable energy, and the benefits it has provided to past, current and future generations.

Genesis Energy Limited (*Genesis*) is seeking replacement resource consents from the Canterbury Regional Council for the damming of the Takapō River, the taking and diversion of water from Lake Takapō and the Takapō River, and the discharge of water and associated contaminants into Lake Pūkaki and the Takapō River from Takapō Power Scheme operations. The replacement consents will enable the continued operation of the Takapō Power Scheme for a 35-year term and Ngā Rūnaka understand that no material changes to the current activities and existing consent flexibility the Takapō Power Scheme are proposed.

Meridian Energy Limited (*Meridian*) is seeking replacement consents to take, use, dam or divert water, and to discharge water and contaminants in order to operate the Ōhau A, Ōhau B, Ōhau C, Benmore, Aviemore and Waitaki Power Stations. The replacement consents will enable the continued operation of the Waitaki Power Scheme for a 35-year term and Ngā Rūnaka understand that no material changes to the current activities and existing consent flexibility of the Waitaki Power Scheme are proposed.

Ngā Rūnaka have recognised the significance of the waters of the Waitaki alongside the significance of the hydro electricity generation to the nation and adopted an intergenerational approach to protecting the health and well-being of the Waitaki Catchment. Ngā Rūnaka have therefore worked collaboratively with the Generators to develop a package that includes:

1. conditions that are to be attached to the resource consents
2. a mitigation package for the duration of the consents
3. an enhanced relationship agreement between Genesis/Meridian and Ngā Rūnaka; and
4. a suite of measures (including financial) that further provide for the management of adverse effects on Ngā Rūnaka with this Ngāi Tahu taonga.

The four components of this package recognise that restoration of the Waitaki Catchment requires time, capacity, commitment, collaboration and importantly resourcing. This approach recognises our rangatiratanga over the Waitaki Catchment and its taonga, including wai māori, and enables greater economic, spiritual and cultural connections for mana whenua.

On behalf of mana whenua, we therefore support the applications by Meridian Energy and Genesis Energy for the ongoing operation of the existing Waitaki/Takapō Power Scheme for 35 years.

We note that this letter is not an affected party approval for the purposes of either sections 95A or 95B of the Resource Management Act 1991 and Ngā Rūnaka may still seek to be submit and be heard in support of any application(s).

Nāhaku noa, nā



Dardenelle McLean-Smith  
**Te Rūnanga o Waihao**

# Attachment 3



43 Tenby Street  
RD2 Pamerston, 9482  
Moeraki.runanga@ngaitahu.iwi.nz

23 June 2023

Canterbury Regional Council  
200 Tuam Street  
Christchurch Central City  
CHRISTCHURCH 8011

Tēnā koe,

We write as rangatira of the Papatipu Runanga of Kāi Tahu whānui representing mana whenua for the Waitaki Catchment, Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki (*Ngā Rūnaka*):

1. The takiwā of Te Rūnanga o Arowhenua centres on Arowhenua and extends from Rakaia to Waitaki, sharing interests with Ngāi Tuahuriri ki Kaiapoi between Hakatere and Rakaia, and thence inland to Aoraki and the Main Divide (Te Rūnanga o Ngāi Tahu (Declaration of Membership Act) Order 2001). Arowhenua marae is located near Te Umu Kaha (Temuka) and is situated near the historic Kāi Tahu kāika of Te Waiateruati and the well-known Arowhenua bush that sustained local Kāi Tahu. Arowhenua connects ancestrally to the waka Takitimu and Ārai-te-uru, the mauka Tarahoua and the awa Waitaki and Opihi. The Kāi Tahu name for The Main Divide is Kā Tiritiri-o-te-moana.
2. The takiwā of Te Rūnanga o Waihao centres on Wainono, sharing interests with Te Rūnanga o Arowhenua to Waitaki, and extends inland to Omarama and the Main Divide (Te Rūnanga o Ngāi Tahu (Declaration of Membership Act) Order 2001). Manawhenua within the Waihao rohe whakapapa to Waitaha, Kāti Māmoe and Kāi Tahu. To these people Waihao is their tūrakawaewae; their home. The name Waihao refers to the hao eel, an important food resource obtained from the Waihao River that has its beginnings in the upland country behind the hills, Te Tari-a-Te-Kaumira (Hunter Hills). The hao eel, the life-stage of the short-fin eel, was and still is a delicacy to whanau who gather mahika kai from the Wainono Lagoon and the Waihao River.
3. The takiwā of Te Rūnanga o Moeraki centres on Moeraki and extends from Waitaki to Waihemo and inland to the Main Divide (Te Rūnanga o Ngāi Tahu (Declaration of Membership Act) Order 2001). The interests of Te Rūnanga o Moeraki are concentrated in the Moeraki Peninsula area and surrounds, including Te Rakahineatea Pā, Koekohe (Hampden Beach), and Te Kai Hinaki (the Boulders Beach) with its boulders. In addition, the interests of the Rūnaka extend both north and south of the Moeraki Peninsula, within their takiwā.

The Waitaki Catchment holds immense significance to Ngā Rūnaka. Waitaki literally means '*the waterway of tears*' and the name is often said to represent the tears of Aoraki, the ancestor of Ngāi Tahu embodied in the mountain. The wai māori of the valleys and basins of the takiwā of Ngā Rūnaka descend from Aoraki and the mauka of Te Waipounamu to the sea. The awa are the lifeblood of the surrounding land and its peoples. The catchments and streams are the veins of the whenua; a source of nourishment, and a living system connecting the peoples of Ngāi Tahu with their ancestor, with mahika kai, with countless taonga, and with each other.

Ngā Rūnaka acknowledge the importance of hydro generation as a source of renewable energy, and the benefits it has provided to past, current and future generations.

Genesis Energy Limited (*Genesis*) is seeking replacement resource consents from the Canterbury Regional Council for the damming of the Takapō River, the taking and diversion of water from Lake Takapō and the Takapō River, and the discharge of water and associated contaminants into Lake Pūkaki and the Takapō River from Takapō Power Scheme operations. The replacement consents will enable the continued operation of the Takapō Power Scheme for a 35-year term and Ngā Rūnaka understand that no material changes to the current activities and existing consent flexibility the Takapō Power Scheme are proposed.

Meridian Energy Limited (*Meridian*) is seeking replacement consents to take, use, dam or divert water, and to discharge water and contaminants in order to operate the Ōhau A, Ōhau B, Ōhau C, Benmore, Aviemore and Waitaki Power Stations. The replacement consents will enable the continued operation of the Waitaki Power Scheme for a 35-year term and Ngā Rūnaka understand that no material changes to the current activities and existing consent flexibility of the Waitaki Power Scheme are proposed.

Ngā Rūnaka have recognised the significance of the waters of the Waitaki alongside the significance of the hydro electricity generation to the nation and adopted an intergenerational approach to protecting the health and well-being of the Waitaki Catchment. Ngā Rūnaka have therefore worked collaboratively with the Generators to develop a package that includes:

1. conditions that are to be attached to the resource consents
2. a mitigation package for the duration of the consents
3. an enhanced relationship agreement between Genesis/Meridian and Ngā Rūnaka; and
4. a suite of measures (including financial) that further provide for the management of adverse effects on Ngā Rūnaka with this Ngāi Tahu taonga.

The four components of this package recognise that restoration of the Waitaki Catchment requires time, capacity, commitment, collaboration and importantly resourcing. This approach recognises our rangatiratanga over the Waitaki Catchment and its taonga, including wai māori, and enables greater economic, spiritual and cultural connections for mana whenua.

On behalf of mana whenua, we therefore support the applications by Meridian Energy and Genesis Energy for the ongoing operation of the existing Waitaki/Takapō Power Scheme for 35 years.

We note that this letter is not an affected party approval for the purposes of either sections 95A or 95B of the Resource Management Act 1991 and Ngā Rūnaka may still seek to be submit and be heard in support of any application(s).

Nāhaku noa, nā



Justin Tipa  
Tumuaki (Chairperson)  
**Te Rūnanga o Moeraki**





Te Rūnanga o NGĀI TAHU

27 March 2025

Fast-track  
Private Bag 63002  
WELLINGTON 6140

Tēnā koe

This letter is provided on behalf of Te Rūnanga o Ngāi Tahu (**Te Rūnanga**) in relation to applications by Genesis Energy Limited (**Genesis**) under the Fast-track Approvals Act 2024 (**Fast-track Act**) for replacement consents to operate the existing Tekapō Power Scheme. Te Rūnanga previously provided a letter to Canterbury Regional Council in June 2023 in relation to the applications by Genesis. This letter is additional to that letter and expressly references the Fast-track Act.

Te Rūnanga is the statutorily recognised tribal body of Ngāi Tahu whānui (as provided by section 15 of the Te Rūnanga o Ngāi Tahu Act 1996 (**TRONT Act**)) and was established as a body corporate on 24 April 1996 under section 6 of the TRONT Act.

Te Rūnanga encompasses five hapū, Kati Kurī, Ngāti Irakehu, Kati Huirapa, Ngāi Te Ruahikihiki, Ngāi Tūāhuriri and 18 Papatipu Rūnanga, who uphold the mana whenua and mana moana of their rohe. Mana whenua are the only people who can describe the values and aspirations for their wāhi tapu and wāhi taonga. Te Rūnanga is responsible for managing, advocating and protecting, the rights and interests inherent to Ngāi Tahu as mana whenua.

The Charter of Te Rūnanga o Ngāi Tahu constitutes Te Rūnanga as kaitiaki of the collective tribal interests. Te Rūnanga also has a responsibility to ensure the well-being of all those who live in its takiwā in accordance with the tikanga of manaakitanga. Te Rūnanga is responsible for managing, advocating for and protecting the rights and interests inherently held by Ngāi Tahu whānui as mana whenua.

The Te Rūnanga o Ngāi Tahu (Declaration of Membership Order 2001) lists the Papatipu Rūnanga that make up Te Rūnanga o Ngāi Tahu and describes their respective takiwā. The Papatipu Rūnanga are identified in the Te Rūnanga o Ngāi Tahu (Declaration of Membership Order 2001) as the entities with responsibility for resources and protection of tribal interests within the area in question.

Notwithstanding its statutory status as the representative voice of Ngāi Tahu whānui, Te Rūnanga accepts and respects the right of individuals and Papatipu Rūnanga to make their own responses as representatives of mana whenua. On this basis, and in relation to the renewal of resource consents by Genesis, Te Rūnanga supports Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki in relation to this matter - with their support of the applications to also be regarded as being the position of Te Rūnanga.

Te Rūnanga o Ngāi Tahu  
Te Whare o Te Waipounamu  
15 Show Place, Addington, Christchurch, 8024  
PO Box 13-046, Christchurch, New Zealand  
Phone + 64 3 366 4344, 0800 KAI TAHU  
Email: [info@ngaitahu.iwi.nz](mailto:info@ngaitahu.iwi.nz)  
Website: [www.ngaitahu.iwi.nz](http://www.ngaitahu.iwi.nz)

This letter is provided to reflect the consultation requirements for referral applications before lodging, under section 11 of the Fast-track Act. Please note that this letter is not an affected party approval for the purposes of either sections 95A or 95B of the Resource Management Act 1991. Te Rūnanga and (in particular) Te Rūnanga o Arowhenua, Te Rūnanga o Waihao and Te Rūnanga o Moeraki expects to be invited to provide comments on the application under section 17 of the Fast-track Act.

Furthermore, in relation to the report on Treaty settlements and other obligations required under section 18 of the Fast-track Act, Te Rūnanga expects that the responsible agency will work with Ngāi Tahu in preparing the report and will reflect the clearly articulated position of Ngāi Tahu recorded in the Treaty Impact Assessment 2023.

Ngā mihi



**Ben Bateman**

Chief Executive Officer