

Attachment Seven

Responses to statements in the Fast-track Approvals Act 2024 referral application form for the Mangahao Hydro-electric Power Scheme

2.6 APPROPRIATENESS FOR FAST-TRACK APPROVALS PROCESS

Explain how referring the project to the fast-track approvals process would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes and is unlikely to materially affect the efficient operation of the fast-track approvals process.

Compared to the conventional process under the Resource Management Act 1991, the fast-track process allows for time savings of between three to four years and millions of dollars in administrative and professional services costs from expanded council processing, regional council hearings and Environment Court appeals. This was the case with the consenting of the Kaimai Hydro-electric Power Scheme (**Kaimai HEPS**) under the FTAA.

Additionally, flow restrictions that are commonly imposed under the Resource Management Act 1991 process have the potential to result in a significant loss of energy production. The experience of King Country Energy and Manawa Energy is that the conventional process under the Resource Management Act 1991 for re-consenting is lengthy, costly and more onerous. Reconsenting processes are taking upwards of six years and resulting in more complex conditions. This has a cost in terms of process costs, compliance costs, and usually a risk of lost generation.

With respect to timeframes, King Country Energy and Manawa Energy's experience includes the following re-consenting examples:

- Mangorei Hydro-Electric Power Scheme – application lodged in November 2020. As at June 2026, Contact Energy is negotiating conditions with submitters.
- Motukawa Hydro-Electric Power Scheme – application lodged in November 2021. As at June 2026, Contact Energy is negotiating conditions with submitters.
- Patea Hydro-Electric Power Scheme – application lodged in early 2007 and consents granted in 2010 following an Environment Court mediation process.
- Matahina Hydro-Electric Power Scheme – application lodged 2009 and consents granted in 2014 following four Environment Court mediations.
- Otago Water Races (Beaumont, Crystals, Black Rock, Shepherds) – application lodged in 2020 and granted in 2023 – but for a 6-year duration only.

Manawa has experienced first hand the time savings that can be derived from the fast-track process via the reconsenting of the Kaimai HEPS (approved on 15 May 2026). Whereas a reconsenting under the Resource Management Act 1991 can take (from the time of lodgement) many years (as demonstrated in the list above), Manawa was able to obtain its approvals through the fast-track process in 32 and a half weeks from lodgement with the EPA.

With respect to the costs of the process, it is the experience of Manawa Energy and King Country Energy that the process costs are historically, in excess of \$2M - \$4M for the more complex processes.

The Kaimai HEPS has also provided Manawa with an understanding of the reduced costs associated

with a fast-track application compared to the traditional RMA consenting pathway. Most expenditure associated with fast-track applications is associated with attendances pre-engagement being undertaking consultation / notification including the commissioning of cultural impact assessments, undertaking scientific research and preparing the associated reports, and preparing the fast-track application. Compared to the typical re-consenting pathways the primary costs savings have been associated with the agility of the fast-track process and the lack of a requirement for a hearing or other quasi-judicial process.

Cost and timing difficulties are recognised in the national policy document *Electrify NZ*, which notes that re-consenting for existing generation assets has become unnecessarily difficult.

No changes are proposed to the overall operating regime for the Mangahao HEPS and no material change in environmental effects is expected. However, the Mangahao HEPS is likely to be publicly notified under the Resource Management Act 1991 and require a substantive hearing. These costs and timeframes are particularly frustrating in the case of the Mangahao HEPS where some of the activities are specifically provided for as a controlled activity by the Horizons One Plan (meaning that consent cannot be declined). Given there are no material changes currently proposed to the operating regime of the Scheme, the public notification and hearing process requirements under the RMA, and subsequent appeal rights, are considered costly, onerous and significantly lengthy. The fast-track process reduces the timeframe to achieve a decision on the application, which is appropriate for the continuation of an existing activity, such as the Mangahao HEPS. The fast-track process offers much more certainty that the project will be consented in a timely manner with more certainty of outcome.

The FTAA has already been successfully used for the re-consenting of hydro-electricity power schemes, notably for the Tekapo Hydro-Electric Power Scheme and the Kaimai Hydro-Electric Power Scheme. These processes highlight that the re-consenting of existing renewable electricity generation infrastructure benefits from the more streamlined FTAA consent pathway.

Notably, the Mangahao HEPS subject to this application was previously referred to the fast-track process and accepted by the Minister. This confirms that the fast-track process would facilitate the project, enabling it to be processed in a more timely and cost-effective way than under normal processes and unlikely to materially affect the efficient operation of the fast-track approvals process.

No material change to the operating regime or the project as previously accepted to the fast-track (“to renew all consents required for the ongoing operation of the Scheme”) is proposed. This referral application is being made only to ensure existing maintenance activities for the effective and safe operation of the dams, and all land holdings, are accurately included.

Expert assessments are in the process of being prepared, and the Assessment of Environmental Effects will follow shortly thereafter. If the project is referred, an application would be lodged in late 2026. Therefore, referring this project will not affect the efficient operation of the fast-track process.

Will the project deliver significant economic benefits?

Yes.

Explain how the project will deliver this.

The key sources of economic benefit from fast-tracking for existing hydro-electric schemes are (a) the reduction in consenting costs, (b) the opportunity cost and loss of focus in the business while time and resources are dedicated to navigating the Resource Management Act 1991 process and (c) the lost

value in generation capacity or consent duration that may occur from a traditional consenting process.

The cost to re-consent a medium hydro-electric power scheme through the traditional consenting pathway is approximately \$2-4 million. Most of the costs are incurred through council processing, hiring consultants, regional council hearing, and any Environment Court appeals – with very little investment into actual environmental benefits. These costs directly slow down investment in new generation assets and increase the cost of electricity for all New Zealanders – a direct loss for NZ and one of the main arguments for fast-track consenting. Reconsenting the Mangahao HEPS will help support the regional economy.

The Scheme's replacement cost is approximately \$541 million and has a regular valuation of \$126 million. Past re-consenting processes under the Resource Management Act 1991 have resulted in a significant loss in generation due to required recreational release flows at two dams and discharge requirements.

Previous reconsenting of other schemes through the RMA has shown up to 4-7% loss generation and these were prior to the 2020 National Policy Statement for Freshwater Management (**NPSFM**) and the National Environment Standards for Freshwater (**NESF**) policies, which now have stricter requirements for river restoration.

Mangahao HEPS powers approximately 20,000 homes

The Mangahao HEPS is located near Shannon in the Horowhenua District, which is part of the Horizons Regional Council area (Manawatū-Whanganui).

The Mangahao HEPS is a run-of-river scheme with a generation capacity of 39.9MW and an annual output of approximately 131 GWh that is embedded in the Electra Lines Company distribution network (but was connected to a grid injection point (GIP) before 2010). Mangahao HEPS generation is equal to approximately 63-64% of the electricity load met by the Mangahao GXP during the morning and evening peak loads.

Mangahao HEPS provides controllable intraday generation

Controllable generation from low-cost non-fossil fuel is an increasingly scarce resource in the New Zealand electricity system. Total and peak electricity demand are rising more quickly than the construction of new capacity. The expansion of new wind and solar increases the system requirement for controllable generation to cover periods when wind and solar electricity output are lower than expected. The two main sources of controllable generation are hydro and gas or coal fueled thermal. There is little prospect of expansion of either of these types of capacity. In addition, gas supply shortages and equipment failure have reduced the reliability of existing gas fuelled generation.

The principal benefit of the Mangahao HEPS is in harnessing energy from the flow of water to create a valuable product, electricity. In addition, intraday hydro generation is more predictable and controllable than wind and solar generation which means it is a more efficient means of meeting demand for electricity than the other methods of renewable electricity generation combined with additional supplementary controllable generation that would be needed to replace the Mangahao HEPS.

It is critical to maintain the generation output from the Mangahao HEPS to avoid the need to replace this output in both the short and long term or add to the expansion of capacity required elsewhere. Any loss of output will also add to the extent to which the region is dependent on net imports and generally more distant sources of supply – with associated increased costs to supply.

The operation of the Scheme results in the employment of six full-time staff who manage the day-to-

day operation of the scheme. The Scheme also results in the employment of numerous support staff and the commissioning of contractors who contribute to the upkeep, maintenance, compliance and operation of the Scheme. This regularly contributes over \$1 million annually into the local economy depending on the maintenance work required that year.

It benefits the New Zealand economy

The main ways that Mangahao HEPS benefits the wider economy include:

- Maintaining the portfolio of controllable and predictable renewable energy generation, improving security of generation to meet demand and meeting these requirements more efficiently than would be possible through other new renewable generation
- Avoiding the substantial capital cost (around \$190.6 million) of constructing both new generation (probably wind outside the area at a cost of \$129.9 million) and new peaker (“on/off”) generation (probably gas fuelled thermal at a cost of \$60.7 million) to address the mismatch between wind output and the Scheme. Grid scale batteries currently available are not suitable for covering this mismatch.
- Avoiding the potential increase in cost of fuel used for generation for the thermal component of the replacement generation. It is estimated that this would be about \$5.8 million per year at recent gas prices but would rise over time.
- Avoiding the cost of transmission losses that would be required if electricity had to be imported from outside the region.
- Helping New Zealand meet its emission reduction targets under the Paris Agreement by continuing to displace greenhouse gas emissions from thermal generation for either baseload or peak demand. The supplementary thermal generation would increase emission by about 25,800 tonnes of carbon dioxide equivalent (tCO₂e) per year.
- Avoiding a slight increase in vulnerability of the Region to the loss of electricity supply through transmission failures.
- Providing hydro-electricity capacity in a different climatic region from the main storage lakes in the South Island; this reduces the risk of correlated dry periods across hydro-electricity capacity.
- Maintaining economic activities associated with operation of the scheme to the benefit of local suppliers of labour, goods and services.

3 PROJECT DETAILS

Adverse effects

Describe any anticipated and known adverse effects of the project on the environment and the significance of those adverse effects.

Manawa Energy has engaged the following experts to prepare full technical assessments:

- Assessment of Environmental Effects – Mitchell Daysh
- Economics Assessment – New Zealand Institute of Economic Research
- Hydrology Assessment – Tonkin & Taylor
- Sedimentation and River Hydraulic Assessment – Tonkin & Taylor
- Aquatic Ecology, Fish Passage and Water Quality Assessment – Ryder Consulting
- Terrestrial and Wetland Ecological Assessment – Tonkin & Taylor
- Natural Character, Landscape and Visual Amenity Assessment – Boffa Miskell
- Recreation Assessment – Rob Greenaway & Associates

- **Dam Safety – Riley Consultants**

The following descriptions are initial high-level summaries of the effects being assessed based on the work of the experts listed above to date. The full expert assessments are in the process of being completed.

Economic Effects – New Zealand Institute of Economic Research are providing an assessment of economic effects from the continued operation of the Scheme. The initial assessment has demonstrated that continuing the Mangahao HEPS delivers significant regional and national benefits.

Hydrological Effects – Tonkin & Taylor have been engaged to prepare a hydrological report on the effects of the Scheme. Their preliminary view based on their work to date is that if the current operation of the Scheme remains unchanged, then the hydrological effects will also remain unchanged.

Dam Safety Effects – Riley Consultants conducted a Comprehensive Dam Safety Review in 2021 and 2024. No material concerns were raised. As such, there are no material dam safety effects associated with re consenting.

Sedimentation Effects – Tonkin & Taylor have also been commissioned to prepare a sediment assessment. They consider that there may be sediment effects associated with the continued operation of the Scheme, which will be characterised when the sediment report is finalised. Erosion effects may occur downstream of the Mangahao Power Station, where the riverbed consists largely of gravel. However, suitable mitigation may be proposed in the final report such as implementation of a sediment management plan to identify appropriate measures for managing the movement of sediment within the Scheme and potential modifications to the sluicing regime.

Aquatic Ecology and Fish Passage Effects – An aquatic ecology and fish passage assessment is being prepared by Ryder Consulting to assess any effects on aquatic ecology values including water quality, from the continued operation, use and maintenance of the Scheme. With regards to fish passage, a number of structures and features of the Scheme have been identified as having the potential to impede fish passage and the assessment will consider measures to address fish passage as part of the application.

Terrestrial Ecology Effects – There is no proposed change to the footprint of the Scheme, so there will be no physical disturbance to any areas of significant vegetation or significant habitats of terrestrial fauna. Tonkin & Taylor have also been engaged to prepare a terrestrial ecology and wetland assessment. Tonkin & Taylor consider that the continued operation, use and maintenance of the Scheme in its current configuration will have negligible effects on terrestrial values. Their assessment will also consider effects on wetland values.

Natural Character, Landscape and Visual Amenity Effects – Various components of the Scheme have been in place for approximately 100 years and are a recognised part of the landscape. Boffa Miskell has been engaged to prepare a natural character, landscape and visual amenity assessment. An initial view, considering the scale and form of the various structures and components of the Scheme, and the natural landscape character of much of the surrounding area, is that the ongoing landscape effects of the Scheme when considered as a whole are low.

Recreation Effects – Rob Greenaway & Associates have been engaged to prepare an assessment on the effects of the Scheme on recreation activities. Whilst the Scheme has heavily modified what was

a natural setting, the Scheme provides for recreational releases and maintains a high level of recreational amenity, including the provision of access and the White-Water Park.

Cultural Effects – Consultation and engagement with mana whenua is ongoing, so the specific cultural effects are yet to be ascertained. However, preliminary engagement suggests that iwi and hapū consider that the key issues raised by the continued use, operation and maintenance of the Scheme relate to fish passage and loss of mauri of the river.

Persons affected

Provide a summary of any consultation undertaken with or notification given to the above persons and/or groups who you consider are likely to be affected by the project, and any other groups required to be consulted with under section 11(1)(a) or receive notification under section (11)(3) of the Act, and how the consultation and responses to notification have informed the project.

Since 2020, King Country Energy has undertaken consultation with relevant iwi, hapū, and key stakeholders as part of preparing the resource consent application for the continued operation, use, and maintenance of the Mangahao HEPS. Relevant iwi and hapū parties were notified of this referral application on 28 and 29 April 2026 in accordance with s 11 of the FTAA. Their comments on the application were invited and a period of 20 working days was given for those comments to be provided. Manawa Energy proposes to continue to engage with stakeholders through hui (i.e. for the presentation of findings) and seek input from stakeholders. Issues relevant to the project will be further addressed in the substantive application.

Consultation with Iwi/Hapū

Rangitāne o Manawatū – King Country Energy initiated engagement with Rangitāne o Manawatū in 2022, beginning with a hui at their whare to understand their interests in relation to the Mangahao Scheme reconsult. Engagement continued throughout 2023 and early 2024 via several online hui and email correspondence to provide updates on progress.

In July 2024, a hui was held in Palmerston North to discuss the technical assessments supporting the reconsult and to outline King Country Energy's intention to seek listing under the Fast-track Approvals Bill. This was followed by a site visit and hui in October 2024. Upon learning that the Mangahao Scheme was not included in the initial Fast-track schedule, Manawa Energy informed Rangitāne o Manawatū and confirmed its intention to apply for referral under the new Act in 2025.

In May 2025, King Country Energy and Manawa Energy representatives met with Rangitāne o Manawatū to outline the details and timeline of the proposed referral application and to request further engagement focused on native fish passage management. Rangitāne o Manawatū have agreed to prepare a Cultural Impact Assessment (CIA) for the Fast-track substantive application

Ngāti Whakare – King Country Energy has been engaging regularly with Ngāti Whakare since 2018 in relation to maintenance projects at the Mangahao Scheme, during which a Cultural Impact Assessment was provided. These earlier projects involved multiple hui, commissioning cultural experts to review project documents, and engaging Ngāti Whakare to lead cultural inductions prior to works commencing.

Engagement on the Mangahao Scheme reconsult has included in-depth hui involving King Country Energy and Manawa Energy technical specialists and Ngāti Whakare cultural and technical experts, presentations of ecological and environmental findings, and support for Ngāti Whakare ecologists

and experts to undertake independent sampling. Between 2020 and 2024, King Country Energy and Ngāti Whakareta participated in multiple site visits and hīkoi across their rohe. Ngāti Whakareta have committed to the development of a Cultural Impact Assessment, which is currently being prepared.

Specific to the fast-track consenting process, King Country Energy informed Ngāti Whakareta of its intention to seek listing under the Fast-track Approvals Bill in May 2024. A follow-up notification was provided later that year advising that the Mangahao HEPS consent was not included in the initial schedule but that a referral application would be submitted under the new legislation in 2025. In November 2024, King Country Energy met with Ngāti Whakareta at Pouto Marae to discuss the relationship going forward. Most recently, in June 2025, an online hui was held to provide an update on the referral process, expected timelines, and the commencement of collaborative fish passage management planning.

Muaūpoko – Consultation with Muaūpoko was initiated in early 2023 regarding the re-consenting process and has since maintained intermittent engagement, primarily through online hui and email correspondence. The re-consenting strategy was presented, along with details of the technical assessments underway. As part of this engagement, Manawa Energy sought to understand the key cultural and environmental issues of significance to Muaūpoko to ensure these matters were appropriately considered in its technical assessments. Muaūpoko expressed interest in the process, requested to be kept informed of progress, and have agreed to prepare a Cultural Impact Assessment closer to lodgement of the substantive application.

In July 2024, additional detail of the consent application was introduced, as well as the intent and timeframes for a fast-track application. Follow up correspondence notified Muaūpoko the Mangahao HEPS consent did not make the schedule in the Act, but indicated that a referral for fast-track application would be made under the new legislation in 2025. A site tour and hui was facilitated in October 2024 with multiple Muaūpoko representatives. King Country Energy representatives met with Muaūpoko in June 2025 to confirm a fast-track referral, as well as obtain interest participating in collaborative investigations into native fish passage through the Scheme.

Ngāti Kahungunu ki Tamaki-nui-ā-Rua – Consultation with Ngāti Kahungunu ki Tamakinui-ā-Rua was initiated with a meeting at Mangahao Power Station in July 2024, where the re-consenting project was introduced and a tour was undertaken. Later in 2024, online hui were held to discuss the process of Ngāti Kahungunu preparing a Cultural Impact Assessment for a fast-track application. Email correspondence was sent which advised that the Mangahao HEPS consent did not make the schedule in the Act but indicated that an application for fast-track would be made with the new legislation. In April 2026, King Country Energy received a draft Cultural Impact Assessment from Ngāti Kahungunu.

Rangitāne Tamaki-nui-ā-Rua – Manawa Energy initiated consultation with Rangitāne Tamaki-nui-ā-Rua with a hui in Dannevirke in July 2024, where the re-consenting project was introduced, providing a scheme overview and timeframes for a fast-track project. This was followed up by an online meeting to discuss the next steps in arranging a Cultural Impact Assessment and organising a scheme tour, which took place in October 2024. Email correspondence was sent which advised that the Mangahao HEPS consent did not make the schedule under the Act, but indicated that an application for fast-track would be made with the new legislation. King Country Energy representatives met with Rangitāne Tamaki-nui-ā-Rua in June 2025 to explain the intention to apply for fast-track referral, with an offer to support the preparation of a Cultural Impact Assessment. In response to the pre-referral notification Rangitāne Tamaki-nui-ā-Rua expressed their expectations for engagement including requesting copies of technical reports, the assessment of environmental effects, management of effects, and details on fish passage design and implementation, connectivity for taonga species,

monitoring and adaptation over the long term. Following this, Manawa Energy met with Rangitāne o Tamaki-nui-ā-Rua and Rangitāne Tu Mai Rā (Rangitāne Tu Mai Rā representatives were also present on behalf of the post-settlement government entity) in June 2026 to provide an update on the Mangahao HEPS re-consent and to kōrero about aquatic ecology findings. Manawa Energy propose to continue to engage with Rangitāne Tamaki-nui-ā-Rua, particularly in collaboration around management of fish passage. The requested further information will also be provided, including final technical report drafts, an assessment of environmental effects and draft conditions.

Ngāti Raukawa ki te Tonga – King Country Energy have been liaising with Ngāti Raukawa ki te Tonga since 2020 in regard to maintenance projects for the Scheme. More recently, King Country Energy have reached out to Ngāti Raukawa ki te Tonga on whether they would like to be involved in further consultation for the Mangahao HEPS re-consent and provided updates on the intention to use the Fast Track process. They have advised that they wish to defer to Ngāti Whakareia as local hapū in the area.

Consultation with other stakeholders

Ministry for the Environment – King Country Energy have previously undertaken pre-lodgement consultation with the Ministry for the Environment (MfE) who were the relevant administering agency for approvals relating to the RMA prior to the December 2025 amendments. They advised that an assessment against any relevant national policy statements or national environmental standards should be included in the application. This information is included below and will be assessed in a more fulsome manner within the substantive application.

Department of Conservation (DOC) – DOC have been involved in the Mangahao HEPS through different projects and compliance activities as part of the existing consents and are the relevant administering agency for the Freshwater Fisheries Regulations 1983. In July 2025, a letter inviting consultation for the fast-track referral process was sent to DOC Fast Track team. An invoice to engage further has been received and a site visit was held in June 2026. Discussions focused on dam operations, fish passage, ecology and consenting. A written pre-lodgement notification response from DOC was received on 19 June 2026 which outlined DOC's preliminary view.

Manawa Energy's understanding is that DOC agrees with the information supplied that a concession is not necessary for the proposed activity, and that part of the proposed activity meets their understood definition for the complex Freshwater Fisheries approval. Manawa Energy does not propose to confine this application to a complex freshwater fisheries approval as an aquatic ecology report will confirm whether the works are a standard or complex freshwater fisheries activity. DOC will provide full comments on the referral application.

Engagement with DOC suggests their key areas of concern center on native fish passage and management, as well as the health of ecological habitats. These concerns often align closely with those raised by tangata whenua, and as noted above, we have incorporated these concerns into our assessments. DOC have requested further sharing of information and Manawa Energy will present findings, draft technical assessments and draft conditions to DOC as they approach final draft.

Fish & Game – An email advising Fish & Game of the intention to lodge a referral application, and invitation for further engagement was sent to the regional branch of Fish & Game in July 2025. A site visit was held in May 2026. Fish & Game tend to engage more actively once technical reports are finalized, especially since the Scheme has been in operation for over 100 years. Manawa Energy intends to initiate a meeting to present these findings in winter 2026.

Recreationalists – King Country Energy and Manawa Energy engage with recreationalist groups as part

of the ongoing operation of the Scheme and consent conditions requiring recreational releases at two locations within the Scheme.

Whitewater New Zealand (“Whitewater NZ”) – King Country Energy and Manawa Energy maintains ongoing engagement with Whitewater NZ ahead of water releases required through consent conditions for the No.2 and No.3 Dams, particularly to monitor weather conditions and ensure a safe experience. During the latter half of the current consent period, issues with the No.2 Dam bypass gate escalated to the extent that releases could no longer be maintained. King Country Energy and Whitewater NZ agreed a temporary variation to the current consent until the gate is repaired and is therefore not currently providing releases at the No 2 Dam. This issue is expected to be resolved later this year, assuming maintenance proceeds as planned. Representatives of Manawa Energy and King Country Energy met with Whitewater NZ (online) in February 2025 to discuss the upcoming re-consent application process and its intent to submit via Fast-track as well as to discuss progress on repairs to the bypass gate.

Environmental White Water Park Trust (“EWWPT”) – Manawa Energy will maintain an ongoing engagement with EWWPT to determine release days for the slalom course downstream of the discharge at the tailrace of the Scheme. EWWPT submits its preferred release dates annually, which are then agreed and confirmed through operational planning with Whitewater NZ. King Country Energy, now Manawa Energy, also leases a section of land adjacent to the slalom course to EWWPT, this includes the supply of water and electricity. King Country Energy met with EWWPT (online) in May 2025 to discuss the upcoming re-consent application through the fast-track process. In June 2026, EWWPT requested further engagement, including a copy of the recreation assessment and discussion of the existing recreational releases. Manawa Energy met with EWWPT and a representative from Whitewater NZ in-person in June 2026 and are now awaiting a proposal from EWWPT around how release ‘days’ are managed under new consents, potentially treating them as ‘hours’ per year to allow more flexibility. Manawa Energy continues to engage with EWWPT and will present findings and reports as they are finalised.

Horizons Regional Council – Initial discussions with Horizons Regional Council (HRC) have taken place with regard to reconsenting the Scheme. On 15 May 2025, Manawa Energy sent a letter inviting consultation about the referral application. Comments on the first referral application were received and outlined significant issues including actual and potential impacts on the hydrology of the waterways, freshwater habitat including flora and fauna, flood management, erosion, water quality and instream ecology, cultural values and the mauri of the waterways. Relevant technical reports are being prepared, and these issues will be addressed in more depth in the substantive application. A site visit was also held in January 2026 to familiarize resource consent technical reviewers from the Horizons Regional Council with the Scheme and answer initial questions.

Horowhenua District Council – Manawa Energy initiated consultation with Horowhenua District Council (HDC) through a letter in September 2025, seeking comment or advice on consultation steps. It is not anticipated that any consents are required from HDC, and HDC are not considered directly affected by the application. HDC provided a response to the notification of referral confirming their interest in participating in the process and requesting more detail around the project description along with maps as they approach final draft. These will be provided and no other immediate actions or concerns are noted at this stage.

Notification under the FTAA

King Country Energy provided notification to the following parties on the 28 and 29 April 2026, pursuant to section 11(1)(b) of the FTAA:

- Tanenuiarangi Manawatū Charitable Trust representing:
 - Rangitāne o Manawatū;
- Te Rūnanga o Raukawa Incorporated representing:
 - Ngāti Raukawa ki te Tonga;
- Ngāti Whakare;
- Rangitāne o Tamaki nui-ā-Rua
- Rangitāne Tū Mai Rā Trust, representing:
 - Rangitāne o Wairarapa; and
 - Rangitāne o Tāmaki-nui-ā-Rua;
- Ngāti Kahungunu ki Tamaki-nui-ā-Rua
- Tāmaki nui-ā-Rua Settlement Trust, representing:
 - Ngāti Kahungunu ki Wairarapa; and
 - Ngāti Kahungunu ki Tāmaki nui-ā-Rua;
- Ngāti Kahungunu Iwi Inc, representing:
 - Ngāti Kahungunu;
- Department of Conservation
- Horizons Regional Council
- Horowhenua District Council

How consultation and responses to notification have informed the project

The environmental and cultural concerns raised through engagement – including the effects of damming on aquatic ecology, disruption to native fish passage, impacts of sluicing and erosion on aquatic habitats, and the broader effects on the mauri of the river – have been acknowledged and engagement will continue to integrate stakeholder issues into the technical assessment programme to ensure these matters are appropriately understood and addressed through robust data.

Hui have been held with all interested tangata whenua entities to begin focused discussions on potential mitigation measures. King Country Energy/Manawa Energy continues to seek feedback and guidance from iwi on the practical and cultural considerations of implementing a native fish (tuna) management programme, including identifying the key barriers within the scheme that may impact its effectiveness.