

Your Comment on the Tekapo Power Scheme – Applications for Replacement Resource Consents project application

Please include all the contact details listed below with your comments and indicate whether you can receive further communications from us by email at substantive@fastrack.govt.nz

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Department of Conservation		
First name	Herbert		
Last name	Familton		
Postal address	Private Bag 4715, Christchurch Mail Centre, Christchurch 8140		
Mobile phone		Work phone	As per mobile
Email	fast-track@doc.govt.nz and hfamilton@doc.govt.nz		

2. We will email you draft conditions of consent for your comment

☒	I can receive emails and my email address is correct	☐	I cannot receive emails and my postal address is correct
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3. Please provide your comments on this application

Please find comments attached

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.



Jenni Fitzgerald

Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 22/08/2025

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Comments on a fast-track consenting application

Fast-track Approvals Act 2024 section 53

To: The Expert Panel

From: Director-General of Conservation

Regarding fast-track project: Tekapo Power Scheme – Applications for Replacement Resource Consents

Fast track Reference: FTA-2503-1035

1 Background

- 1.1 Genesis Energy Ltd (Genesis) is seeking replacement consents under the Fast-track Approvals Act 2024 for its upper catchment component of the Waitaki Hydro - Electric Power Scheme (HEPS), namely, its Tekapo A and B power stations. The scheme is recognised as a nationally important power generation facility under the National Policy Statement for Freshwater Management 2020. All the consents sought are for activities that are controlled activities under the Resource Management Act 1991 and the Waitaki Catchment Water Allocation Regional Plan.
- 1.2 In 1990, the Director-General of Conservation (D-G) negotiated with the Electricity Corporation of NZ for compensatory provisions to address the effects of the Waitaki HEPS on braided river ecosystems. The outcome was the implementation of Project River Recovery (PRR), which is currently funded to the value of approximately \$700,000 yearly. The Canterbury Conservation Management Strategy includes Policy 2.6.4 which directs the Department of Conservation (DOC) to seek and continue a compensatory agreement with the generators.

2 The Replacement Agreement

- 2.1 Through 2022 and 2023, DOC negotiated a replacement agreement with both generators. The result was a new agreement signed in 2023 between the D-G, Genesis and Meridian Energy Ltd (Meridian).
- 2.2 The new agreement commits both Meridian and Genesis (the Generators) to funding an Indigenous Biodiversity Enhancement Programme, to be delivered by DOC, worth \$2.3 million (plus GST) annually for the duration of any new consents granted. Genesis' share of the agreement (13%) is \$0.2 million, inflation adjusted, for the term of the new consents.

- 2.3 The agreement is intended to compensate for environmental effects of the Waitaki HEPS. Under the agreement, the D-G committed to supporting Genesis' application for resource consents (sections 6.3 and 6.4 of the agreement).

3 General Comment

- 3.1 As stated in Appendix U of the Genesis AEE, DOC supports the current application for replacement resource consents as sought by Genesis. This is because conservation matters are addressed through proposed conditions requiring implementation of the Indigenous Biodiversity Enhancement Programme, which mirror the D-G's agreement with Genesis.
- 3.2 DOC has high confidence that the biodiversity objective and outcomes in proposed Condition 28 can be achieved. This is because of the following factors:
- The history and ongoing performance of PRR work of the DOC team based in Twizel.
 - The multiple independent reviews by Manaaki Whenua Landcare Research regarding PRR biodiversity outcomes.
 - The volume and quality of peer reviewed science generated by PRR on the manipulation of braided river ecosystems to produce positive biodiversity outcomes.
 - The international standing of the science advisers providing advice on the agreement.
 - DOC has a proven history in being able to deliver such a programme.
 - The programme is fully costed and funded.

4 Conditions

- 4.1 DOC has no further comment on conditions at this stage.

5 Conclusion

- 5.1 Thank you for the opportunity to comment.