

Attachment Five

Applicant's responses to statements in the Fast-track Approvals Act 2024 referral application form for the Coleridge Hydro-electric Power Scheme Reconsenting Project

SECTION 1: APPLICANT DETAILS

Compliance and enforcement history

Have there been any compliance or enforcement actions taken against the applicant (or if the referral application is lodged by more than one person, any of those persons) under a specified Act definition for either 'compliance' or 'enforcement'?

Yes.

If you answered yes above, please provide a summary of the relevant legislation and provisions, and any compliance or enforcement actions, and the outcome of those actions taken under the specified Act against the applicant or applicants, if the referral is being lodged jointly.

Contact acquired Manawa Energy in July 2025. Accordingly, this section answers the questions with respect to both Contact and Manawa Energy.

Contact

Contact has been a major operator of large power stations in New Zealand since 1996. Contact has an extensive portfolio of electricity generation assets and has a proven track record of environmental compliance in relation to Contact's operation of these sites.

Contact has a strong commitment to the environment and robust processes to ensure compliance with the resource consents and other approvals it holds. Prior to the acquisition of Manawa Energy, Contact had 11 generation sites located throughout New Zealand and held approximately 120 resource consents associated with the construction, operation and maintenance of these generation sites. These consents are comprised of 3,500 conditions. Contact has reliable and regularly reviewed and audited systems in place to ensure adherence to these conditions. This includes a regular environmental monitoring programme, effective site management, public disclosure of compliance in annual integrated reports, and effective policies and procedures.

Since the formation of Contact in 1996 there are only three instances where compliance and/or enforcement actions have been taken against Contact by a local authority under the Resource Management Act 1991 (**RMA**). All of these have been remedied by Contact.

- Contact has extensive environmental offset and restoration conditions associated with its Ohaaki Geothermal Power Station, including in relation to wetland areas. In April 2021 it received an abatement notice from Waikato Regional Council in relation to aerial (helicopter) boom spraying of pest plants and weeds in the Torepatutahi Wetland in February 2020. The spraying was conducted in accordance with Contact's consents and permitted activity guidelines, however, it also resulted in kill of non-target species. The abatement notice directed Contact to be more selective in conducting pest control methods. Contact has undertaken a full review of the ecological restoration programme in communication with mana whenua and

stakeholders and prepared an Annual Work Plan to inform interested parties and guide activities in and around the wetland.

- In February 2019, a geothermal reinjection well on Contact's Wairākei geothermal steamfield over-pressurised, causing geothermal water to be discharged into a nearby soakage pond not intended to store such volumes. Consequently, the pond gave way, causing soil and geothermal water to flow into the nearby Waipuwera Stream. Contact was prosecuted and participated in an ā-kanohi restorative justice process with the affected hapū of Ngāti Tūwharetoa, culminating in a comprehensive cultural impact assessment, formal apology and full suite of long-term mitigations agreed with tangata whenua and the Court. An important outcome was the development of a much stronger and deeper understanding by Contact of Ngāti Tūwharetoa and their relationship to the whenua and awa, and their role as kaitiaki and mana whenua.
- In July 2022, Otago Regional Council (**ORC**) issued Contact with an abatement notice directing it to submit to ORC a revised Landscape and Visual Amenity Plan (**LVAMP**) for the Kawarau Arm of Lake Dunstan. The LVAMP manages the landscape and visual amenity effects associated with the on-going operation of the Clyde Dam as they occur in the Kawarau Arm (near Cromwell). The condition requires Contact to reassess the LVAMP every five years. The draft of the 2019 to 2024 reassessment was forwarded to the ORC and Central Otago District Council for consultation and mistakenly approved. A further draft of the reassessed LVAMP was submitted in June 2022, however, ORC considered that the new LVAMP did not appropriately cover key matters such as plant pest management and driftwood accumulation and requested further assessment. Contact worked proactively with the Councils and key stakeholders to prepare a new LVAMP. This was submitted to ORC for approval, and subsequently the abatement notice was uplifted in March 2023.

Considering the breadth of Contact's electricity generation assets, the organisation has established a commendable record of environmental compliance in relation to the construction, operation, and maintenance of these facilities. Contact is committed to upholding best management practices and compliance standards to ensure adherence to its consent conditions. Furthermore, the company will implement the necessary strategies and resources to facilitate this commitment.

Manawa Energy

Manawa Energy has managed the Scheme for approximately 30 years. Manawa Energy has had a positive record of compliance with its consents across New Zealand. Most non-compliances received have related to minor technical incidents that have been quickly addressed without formal compliance or enforcement action taken by the regulators. In the last 30 years Manawa Energy has received four abatement or infringement notices as described below. These lower-level enforcement actions have always been promptly addressed to a high standard and no further action has been taken by the regulators.

Manawa Energy has been prosecuted by a regulator once in 30 years. ORC brought a prosecution against (then) Trustpower Limited (**Trustpower**) for a discharge of sediment from Beaumont Race at the Waipori Scheme into the Beaumont River.

Formal enforcement action against Manawa Energy can be summarised as follows:

Otago region – Trustpower pleaded guilty to one charge for breach of s 15(1)(b) RMA by discharging contaminants (that is soils, silts, gravels and other materials forming the Beaumont water race) onto land in circumstances where those contaminants may have entered water. This followed an event in late December 2017 when Trustpower was undertaking works on a section of the Beaumont water race, and a heavy rain event during the Christmas/New Year break caused water to accumulate and then breach the race wall, with the discharge flowing into the Beaumont River. Trustpower was fined \$38,250. See *Otago Regional Council v Trustpower Limited* [2019] NZDC 1990. There have been no further compliance incidents at Beaumont.

Taranaki region –

- The annual Lake Rotorangi visual lakeshore monitoring was not completed in 2018, resulting in an infringement notice being issued in April 2019. Annual lakeshore monitoring re-commenced in 2019. Since receiving this infringement notice Manawa Energy has worked with a local consultant to complete the annual inspections. No further issues have occurred (Infringement Notice EAC-22627).
- Taranaki Regional Council was not satisfied that juvenile fish were being released at the locations specified within the existing management plan resulting in an abatement notice in December 2019. Following this abatement notice Manawa Energy reviewed the management plan and worked with the site team to address this issue. This has resulted in ongoing consent compliance (Abatement Notice EAC-23058).
- Taranaki Regional Council was not satisfied that sufficient information had been provided to demonstrate the efficacy of the eel diverter system that had been installed to provide non-lethal downstream passage for migrant eels at Pātea Dam, and that re-establishment of lamprey populations within the upstream catchment was occurring. Following an abatement notice in October 2021 Manawa Energy completed additional studies to provide the requested information within the stipulated timeframes and a consent variation was completed to address an issue with the consent condition specific to lamprey. This has resulted in ongoing consent compliance (Abatement Notice EAC-24227).
- Following an eel mortality event downstream Pātea Dam on 27 April 2023, Taranaki Regional Council determined that non-lethal passage past the dam was not provided on that particular date, resulting in an infringement notice being issued. Following this infringement notice Manawa Energy reviewed its procedures and implemented changes to enhance downstream passage past the dam. Monitoring of downstream migrants during subsequent seasons has shown non-lethal passage for migrant eels has been provided effectively and that ongoing consent compliance has been demonstrated (Infringement Notice EAC-25349).

Whilst not a specific enforcement or compliance ‘action’, for the Coleridge HEPS specifically a Compliance Monitoring Report in August 2022 required Manawa Energy to address the take limit from the Wilberforce River to the Wilberforce Canal. Manawa Energy put in place an action plan that addressed the issues, and has not received any further correspondence from ECan regarding this matter.

SECTION 2: REFERRAL APPLICATION SUMMARY

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.

Contact's experience with the FTAA has been positive, with the decision on the Southland Wind Farm exemplifying how referrals under the FTAA can facilitate projects.

This is also the experience of Contact's wholly owned subsidiary, Manawa Energy, with the reconsenting of hydro-electricity schemes. Compared to the RMA process, the fast-track process allows for time savings of up to 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.

Additionally, flow restrictions that are commonly imposed under the RMA have the potential to result in a significant loss of energy production. Manawa Energy's experience is that the normal RMA process for reconsenting 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, Manawa Energy's experience includes the following reconsenting examples:

- Wheao Hydro-Electric Power Scheme – application lodged in June 2023. This scheme is listed in Schedule 2 to the Fast-track Approvals Act 2024. This has assisted with expediting its processing under the RMA, and those consents were granted on 3 August 2026.
- Mangorei Hydro-Electric Power Scheme – application lodged in November 2020. As at June 2026, Manawa Energy is negotiating conditions with submitters.
- Motukawa Hydro-Electric Power Scheme – application lodged in November 2021. As at June 2026, Manawa 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. The consents were due to expire in 2029 but have been extended by the Resource Management (Consenting and Other System Changes) Amendment Act 2025.

Manawa Energy has experienced first hand the time savings that can be derived from the fast-track process via the reconsenting of the Kaimai Hydro-electric Power Scheme (approved on 15 May 2026). Whereas a reconsenting under the RMA 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, Manawa Energy's experience is that the process costs are historically, in excess of \$2M - \$4M for the more complex processes.

The Kaimai HEPS has also provided Manawa Energy 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 pre-engagement consultation - including the commissioning of cultural impact assessments, undertaking technical assessments, and preparing the fast-track application. Compared to the typical reconsenting 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 reconsenting for existing generation assets has become unnecessarily difficult.

The reconsenting of the Coleridge HEPS would likely be publicly notified under the RMA and require a public hearing. These costs and delays are particularly frustrating in the case of the Scheme, which is provided for in the CLWRP as a controlled activity (meaning that consent cannot be declined). 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 Coleridge HEPS. The Scheme is an inter-generational asset that requires constant investment and maintenance appropriate with long-life assets. A shorter-term consent puts this investment at risk. 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 reconsenting of hydro-electricity power schemes, notably for the Tekapo Hydro-Electric Power Scheme, and the Kaimai HEPS (as set out above). The reconsenting of the Mangahao and Kuratau Hydro-Electric Power Schemes have also been successfully referred under the FTAA. These processes highlight that the reconsenting of existing renewable electricity generation infrastructure benefits from the more streamlined FTAA consent pathway.

Expert assessments are in the process of being prepared, and the Substantive Application Report will be developed thereafter. Therefore, referring this project will not affect the efficient operation of the fast-track process. A 3-year referral period is sought to provide sufficient lead in time for technical assessments.

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 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 RMA 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 station 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 Coleridge HEPS will help support the regional New Zealand economy.

Rebuilding the Coleridge HEPS would cost \$300 million. The Coleridge HEPS generates 270 GWh. Consenting, and then building 270 GWh of new generation elsewhere (for example, wind backed by

thermal) would cost approximately \$359.8m.

Previous reconsents of other hydro-electric power schemes through the RMA has shown up to 4-7% of lost generation, and these were prior to the 2020 National Policy for Freshwater Management (**NPSFM**) and National Environmental Standards for Freshwater (**NESF**) policies, which now have stricter requirements for river restoration. Losing 7% of water through a reconsenting process is 19GWh of lost generation, and the cost to replace that generation would be \$25 million for new generation investment, which would be required to fill the shortfall and increasing demand.

The Coleridge HEPS powers ~33,700 homes in the Canterbury Region

The Coleridge HEPS is located in the Selwyn District which is part of the Canterbury (Environment Canterbury) Regional Council area. The Coleridge HEPS is a storage scheme with Lake Coleridge fed by the Wilberforce and Harper Rivers, and the Acheron Stream with a generation capacity of 39.5MW and an annual output of approximately 270 GWh.

The Coleridge 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 fuelled 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 Coleridge 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 Coleridge HEPS.

It is critical to maintain the generation output from the Coleridge 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 \$10 million annually to the local economy depending on the maintenance work required that year (including the supply of irrigation water which support the local agricultural industry).

It benefits the New Zealand economy

The main ways that Coleridge 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 (approximately \$359.8m) of constructing both new generation (probably wind outside the area at a cost of \$266.6m) and new peaker (“on/off”) generation (probably gas fuelled thermal at a cost of \$93.2m) 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 \$6.3 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 27,970 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.
- Maintaining economic activities associated with operation of the scheme to the benefit of local suppliers of labour, goods and services.

SECTION 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/Contact have engaged the following experts to prepare full technical assessments:

- Hydrology Assessment – Tonkin & Taylor
- Sedimentation and River Geomorphology Assessment – Earth Sciences New Zealand
- Coastal Geomorphology Assessment – Dr. Martin Single
- Groundwater Flow Assessment– Pattle Delamore Partners
- Aquatic Ecology Assessment including fish passage – Earth Sciences New Zealand, Ryder Consulting, and Waterways Consulting
- Terrestrial Ecology Assessment, including Avifauna – Blue Green Ecology
- Natural Character, Landscape and Visual Amenity Assessment – Stephen Brown
- Recreation Assessment – Rob Greenaway & Associates
- Economics Assessment – New Zealand Institute of Economic Research
- Substantive Application Report and Statutory Planning Assessment – Mitchell Daysh.

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.

Hydrological Effects – Tonkin & Taylor have been engaged to prepare a hydrological report on the effects of the Scheme. Tonkin & Taylor will consider the hydrological effects associated with the current operation of the scheme, including matters such as the lake operating regime, minimum flow requirements for contributing rivers, the effects and the influence of groundwater inflows on river levels.

Sedimentation Effects – Earth Sciences New Zealand are undertaking a sediment and river geomorphology assessment. The assessment will consider the effects of the Scheme operation, including those effects on the turbidity of water and lake clarity within Lake Coleridge. Consideration will be given to varying sediment inflows from contributing rivers, erosion and natural disturbance of sediments on the bed of the lake. Drawing on this work, the associated effects of this turbidity on environmental values, including ecological, amenity, and recreational will be assessed in the other technical studies.

Coastal Geomorphology Effects – Dr. Martin Single will assess the effects on the physical lakeshore of Lake Coleridge and the Rakaia River hāpua processes. Preliminary findings suggest that the Lake Coleridge shoreline is robust and has adapted to the operation regime, and the continued operation of the Scheme will not result in adverse effects on the shore character. Effects on the Rakaia River hāpua and coastal processes from the continued operation of the Scheme are projected to be consistent with historical effects and are unlikely to be discernable from the natural variability of coastal change resulting from differences in river flows and oceanic storminess.

Groundwater Flow Effects – Pattle Delamore Partners will assess the effects of the Scheme on groundwater flow through riverbed gravels. Specifically, they will assess the reaches downstream of the diversions in the Wilberforce, Harper and Acheron Rivers. The findings of this assessment will help inform the sedimentation assessment and wetlands assessment.

Aquatic Ecology Effects – Earth Sciences New Zealand, Ryder Consulting, and Waterways Consulting are assessing effects on aquatic ecology values including water quality from the continued operation of the Scheme. The effects on both indigenous fish species and introduced species, and on riverbed vegetation and fauna will be assessed. They are also assessing the impacts of the Scheme on fish passage.

Terrestrial Ecology Effects – Blue Green Ecology are assessing the effects on terrestrial ecology, which includes the effects on wetlands. They are also assessing the effects on avifauna. There are no proposed changes to the footprint of the Scheme. The operation of the Scheme does include physical disturbance to the braids of Wilberforce and Harper Rivers, and this assessment will consider the effects on this ecology.

Natural Character, Landscape and Visual Amenity Effects – Stephen Brown will assess the effects on natural character, landscape and visual amenity. While the Scheme is located in landscape which is considered to be regionally significant and outstanding, the Scheme lacks prominence in the landscape and is not highly visible. There are no changes proposed to the structures of the Scheme. The assessment will consider the effects of the continued operation of the Scheme, including those associated with changes in water clarity.

Recreation Effects – Rob Greenaway & Associates will assess the effects of the Scheme on recreational activities. The assessment will consider the effects of lake level management on public access to the lake, recreational facilities (such as boat ramps), use of the lake and user safety.

Economic Effects – New Zealand Institute of Economic Research are providing an assessment of economic effects from the continued operation of the Scheme.

Cultural Effects – Consultation and engagement with mana whenua is ongoing, and Manawa Energy and Contact hope to engage mana whenua on the preparation of Cultural Impact Assessments. This will help to understand the mana whenua values potentially affected by the Scheme. Previous consent renewals identified mana whenua values as mahinga kai and fish passage (specifically for tuna migration).

Affected persons

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.

Engagement with Iwi/Hapū

Manawa Energy notified, contacted and consulted with three Rūnanga through their two environmental consultancies at the time, Mahaanui Kurataiao Ltd and Aoraki Environmental Consultancy, in late 2024 with some face-to-face hui in early 2025 regarding the reconsenting of Coleridge HEPS. Contact consulted with Te Rūnanga o Ngāi Tahu (**TRONT**) in 2025. The direction from TRONT was to continue engaging with the Rūnanga:

- Ngāi Tūahuriri Rūnanga;
- Te Taumutu Rūnanga; and
- Te Rūnanga o Arowhenua.

Hui and site visits are currently being organised and Manawa Energy and Contact will offer to resource and encourage development of Cultural Impact Assessments.

Manawa Energy and Contact initiated fish passage trap-and-transfer activities for downstream migrating tuna and upstream migrating elver at Lake Coleridge during the 2024–2025 summer season and is continuing this work in the 2025–2026 season. All Rūnanga were invited to participate in downstream netting and transfer activities, and representatives from consultancies and Rūnanga have participated.

Contact has also installed one of two upstream elver traps at the tailrace, which the Rūnanga have visited. Contact is encouraging ongoing Rūnanga involvement, including co-design of a permanent native fish passage programme, to be incorporated into the Native Fish Management Plan for the reconsents.

On 28 July 2026, Aoraki Environmental Consultancy provided Manawa Energy / Contact with a letter confirming that Arowhenua, Tūāhuriri Rūnanga, and Te Taumutu Rūnanga anticipate continued engagement by Contact with the Rūnanga on reconsenting both in preparing the substantive application and throughout the fast-track decision making process to ensure Rūnanga concerns are appropriately addressed. Arowhenua confirmed that it has no comments on the content of the referral application provided.

No feedback was received from Mahaanui Kurataiao Ltd and instead on 4 August 2026 it advised that engagement should continue directly with Ngāi Tūāhuriri Rūnanga and Te Taumutu Rūnanga. It requested that it still be recorded as an interested party in the referral application.

Engagement with other stakeholders

Department of Conservation (DOC) – In September 2025, a letter inviting consultation for the fast-track referral process was sent to the DOC fast-track team. A site visit with DOC staff was held on 22 September 2025 and it subsequently provided feedback on the referral application.

Fish & Game – Discussions with Fish & Game were initiated through Earth Sciences New Zealand and their request to obtain aquatic ecology data. A meeting took place in December 2025 with the applicant's expert team, which discussed current fieldwork and the scope of the technical assessments.

Environment Canterbury – Initial discussions with Environment Canterbury have taken place with regard to reconsenting the Scheme. In July 2025, a request for a pre-application meeting was sent. An initial pre-application meeting took place in July 2025. A site visit with Environment Canterbury staff was held on 22 September 2025 and 30 April 2026.

Selwyn District Council - Manawa Energy initiated consultation with Selwyn District Council (**SDC**) through a letter in September 2025, seeking comment or advice on consultation steps. SDC provided a response confirming their interest in participating in the process, but with no immediate actions or concerns at that stage.

Notification under the FTAA

Notification was given on 1 April 2026 to:

- Ngāi Tūāhuriri Rūnanga;
- Te Taumutu Rūnanga;
- Te Rūnanga o Arowhenua;
- Te Rūnanga o Ngāi Tahu;
- Department of Conservation;
- Environment Canterbury; and

- Selwyn District Council.

How responses to notification have informed the project

Aoraki Environmental Consultancy – no comments were received on the referral application documents provided. Manawa Energy / Contact remain committed to working with the Rūnanga during the preparation of the substantive application and whilst in-process.

Mahaanui Kurataiao Ltd – no comments were received on the referral application documents provided. As advised, Manawa Energy / Contact are committed to engaging directly with the Rūnanga.

Environment Canterbury – a site visit was held with Environment Canterbury on 30 April 2026, and it provided written feedback on the referral application on 4 May 2026. The written feedback made comments about the consent requirements for the Scheme, the policy framework, and technical matters for consideration in the substantive application. This response will be considered by Manawa Energy/Contact as the substantive application is developed.

DOC - DOC also attended a site visit and subsequently provided comprehensive written feedback on the referral application. The written feedback included comments about the approvals for the Scheme, and matters for consideration in the substantive application. This response will be considered by Manawa Energy/Contact as the substantive application is developed. The DOC response highlighted that concessions may be required and the referral application includes reference to possible applications for these.

List any Treaty settlements that apply to the project area and provide a summary of the relevant principles and provisions in those settlements, including any Treaty settlements that apply over or include the area in which the project is located.

The Ngāi Tahu Deed of Settlement dated 21 November 1997 is the only relevant Treaty settlement for the scheme. The Ngāi Tahu Claims Settlement Act 1998 (**Settlement Act**) reflects the Ngāi Tahu Deed of Settlement. The settlement provides a Crown acknowledgement of, and apology for, historical grievances, extensive redress involving financial redress, rights and interests in various properties, recognition of taonga and geographic areas, transfer of forest land, changes to place names, advisory roles, rights of first refusal, and other acknowledgements.

The relevant part of the settlement for the Scheme is a statutory acknowledgement over Whakamātau (Lake Coleridge). The statutory acknowledgement recognises Ngāi Tahu's historical relationship with, and traditions in respect of, Whakamātau.

Whakamātau was a notable mahinga kai where tuna (eel) and water fowl were taken. The kiore (polynesian rat) was also taken in this region. The tūpuna had considerable knowledge of whakapapa, traditional trails and tauranga waka, places for gathering kai and other taonga, ways in which to use the resources of the lake, the relationship of people with the lake and their dependence on it, and tikanga for the proper and sustainable utilisation of resources. All of these values remain important to Ngāi Tahu today.

Whakamātau was an integral part of a network of trails linking North Canterbury and Te Tai Poutini (the West Coast) which were used by the tūpuna in order to ensure the safest journey and incorporated locations along the way that were identified for activities including camping overnight and gathering kai. Knowledge of these trails continues to be held by whānau and hapū and is regarded as a taonga. The traditional mobile lifestyle of the people led to their dependence on the resources of the lake.

As a result of the area's history as a settlement site and part of a trail, there are many urupā associated with the lake. Urupā are the resting places of Ngāi Tahu tūpuna and, as such, are the focus for whānau traditions. These are places holding the memories, traditions, victories, and defeats of Ngāi Tahu tūpuna, and are frequently protected by secret locations.

The mauri of Whakamātau represents the essence that binds the physical and spiritual elements of all things together, generating and upholding all life. All elements of the natural environment possess a life force, and all forms of life are related. Mauri is a critical element of the spiritual relationship of Ngāi Tahu Whānui with the lake.

The statutory acknowledgement has the following purpose:

- Consent authorities must forward summaries of resource consent applications to Te Rūnanga o Ngāi Tahu as required by regulations.
- Local authorities must have regard to a statutory acknowledgement when considering whether Rūnanga o Ngāi Tahu is a person who may be adversely affected by the granting of a resource consent for activities within, adjacent to, or impacting directly on, the statutory area.
- The Environment Court must have regard to a statutory acknowledgement when determining whether Te Rūnanga o Ngāi Tahu is a person having an interest in the proceedings greater than the public generally in respect of an application for a resource consent for activities within, adjacent to, or impacting directly on the statutory area.
- The Minister responsible for management of Whakamātau or the Commissioner of Crown Lands, as the case may be, may enter into a Deed of Recognition for Whakamātau.
- Te Rūnanga o Ngāi Tahu and any member of Ngāi Tahu Whānui may cite the relevant statutory acknowledgement in submissions to, and in proceedings before, a consent authority, the Environment Court, or Heritage New Zealand Pouhere Taonga concerning activities within, adjacent to, or impacting directly on a statutory area as evidence of Ngāi Tahu's association with the statutory area.
- Local authorities must include the statutory acknowledgement in all regional policy statements, district plans, and regional plans (including proposed plans and proposed policy statements).

The settlement provides a Crown acknowledgement of the cultural, spiritual, historic, and traditional association of Ngāi Tahu with the taonga species (birds, plants and animals) listed in Schedule 97 of the Settlement Act. The Minister of Conservation must consult with Ngāi Tahu in advance of any relevant conservation management strategy reviews or the preparation of any statutory or non-statutory plans, policies, or documents (including any amendments or reviews) relating to a taonga species and consult with, and have particular regard to the views of, Te Rūnanga o Ngāi Tahu when the Minister makes policy decisions concerning the protection, management, or conservation of a taonga species.

The settlement also provides a Crown acknowledgement of the cultural, spiritual, historic, and traditional association of Ngāi Tahu with the taonga fish species listed in Schedule 98 of the Settlement Act. The acknowledgement requires the Crown to consult with Ngāi Tahu on any policy decisions concerning the protection, management, use, or conservation of the taonga fish species within the Ngāi Tahu claim area, including the promulgation of any regulations under any enactment. The Minister of Conservation must also consult with, and have particular regard to the advice of, Te Rūnanga o Ngāi Tahu in its capacity as an advisory committee appointed pursuant to the deed of settlement.

REFERRAL PROJECT AREA

Project records of title and legal descriptions:

Record of Title	Legal Description
CB43B/8	Lot 1 Deposited Plan 74973
CB43D/247	Section 3 Survey Office Plan 19791, Section 2-3 Survey Office Plan 16792, Section 1-3 Survey Office Plan 19796 and Section 1-2 Survey Office Plan 19685
CB45A/724	Lot 1 Deposited Plan 79949 and Section 2 Survey Office Plan 19722
CB44C/68	Section 1 Survey Office Plan 19793
CB38C/653	Lot 18 Deposited Plan 60506
CB38B/175	Section 1 Survey Office Plan 19017
CB43D/246	Section 1-2 Survey Office Plan 19690
CB44C/719	Section 1 Survey Office Plan 19715, Section 1 Survey Office Plan 19720, Section 1 Survey Office Plan 19751 and Lot 1 Deposited Plan 77863