

29 September 2025

Fast-track Panel

Tēnā koutou,

Floor 2
The Regent Building
33 Cathedral Square
Christchurch 8011

PO Box 13831
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New Zealand

Response to comments – Genesis Energy Limited

Tekapo Power Scheme

al.nz

- 1 Te Rūnanga o Arowhenua, Te Rūnanga o Waihao, and Te Rūnanga o Moeraki (collectively, *Kā Rūnaka*) provided comment on the application by Genesis Energy Limited (*Genesis*) for replacement resource consents in relation to the Tekapo Power Scheme under sections 53 and 54 of the Fast-track Approvals Act 2024. Kā Rūnaka are the three Papatipu Rūnanga of Ngāi Tahu that represent mana whenua in the project area and wider Waitaki catchment.
- 2 Kā Rūnaka have reviewed the memorandum from Christina Robb regarding her review of the Indigenous Biodiversity Enhancement Programme (*IBEP*). Kā Rūnaka appreciate the opportunity to comment on Ms Robb's review and recommendations and largely agree with her findings, including that:
 - (a) the broad objective and holistic catchment approach of the IBEP will allow the programme to adjust as necessary; and
 - (b) Kahu Ora provides tangible and measurable outcomes and clarity on what will be measured.
- 3 However, Kā Rūnaka remain of the view that the consent conditions proposed by Genesis are appropriate and no further changes are required. In particular, Kā Rūnaka remain concerned that the changes to consent conditions to require input from other parties will put the programme at risk, with the potential to frustrate the stated purpose of the programme.
- 4 Kā Rūnaka understand that Genesis is proposing two amendments to condition 29 and one to condition 31 in response to Ms Robb's comments. These changes are intended to reflect her comments that the strategic plan should identify outcomes and progress towards those. Kā Rūnaka considers that these amendments are largely recording a common-sense approach and are not strictly necessary. However, Kā Rūnaka do not consider that these amendments will put the programme at risk and therefore are not opposed to their inclusion.
- 5 Regarding further amendments proposed by Ms Robb to require feedback from other parties working on biodiversity in the Waitaki catchment, Kā Rūnaka are opposed to such amendments as:
 - (a) what is legally required to satisfy '*seeking feedback*' to satisfy these conditions is uncertain;
 - (b) processes of formally seeking feedback are likely to slow down the progress of preparing strategic plans without adding any significant value;
 - (c) substantial collaboration and cooperation is already taking place in the Waitaki catchment and does not need to be formally required in consent conditions;

- (d) no other party operating in the Waitaki catchment, including Canterbury Regional Council and Land Information New Zealand, have formal consent condition requirements to seek feedback from other parties; and
 - (e) the Kahu Ora programme is likely to be significantly greater in size and scale than any other biodiversity programme in the catchment, such that other programmes will likely need to work alongside Kahu Ora, rather than Kahu Ora working around other programmes.
- 6 In summary, Kā Rūnaka do not consider these amendments are appropriate for consent conditions.
- 7 Kā Rūnaka remain of the view that this programme is appropriately led by the Department of Conservation, in partnership with Kā Rūnaka, Genesis and Meridian Energy Limited. Any involvement of other parties must not paralyse or over-complicate the decision-making process, to the detriment of the proposed enhancement and restoration.

Na maua noa, nā
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