

Referral application form for the fast-track process

Section 1: Applicant details

A person or persons may apply to use the fast-track process for a project. Where there is more than one person, the referral application must be lodged jointly by all of the persons who are proposed to be authorised persons for the project.

If the referral application is accepted and referred by the Minister, the person or persons who lodged the referral application will be specified as the person who is, or the persons who are, authorised to lodge a substantive application for the project.

1.1 Applicant(s) – repeat for all applicants

1.1.1 Organisation name: [King Country Energy Limited](#)

1.1.2 NZBN (optional): [9429039162601](#)

1.1.3 Contact name: [Lisa Mead](#)

1.1.4 Phone: s 9(2)(a)

1.1.5 Email address: s 9(2)(a)

1.1.6 Postal address (if preferred method of contact):

1.2 Agent acting on behalf of applicant (if applicable)

1.2.1 Organisation name: [Holland Beckett](#)

1.2.2 Contact name: [Vanessa Hamm](#)

1.2.3 Phone: s 9(2)(a)

1.2.4 Email address: s 9(2)(a)

1.2.5 Postal address (if preferred method of contact):

1.3 Finance – Agent acting on behalf of applicant (if applicable)

1.3.1 Organisation name: King Country Energy Ltd

1.3.2 Contact name: Lisa Mead

1.3.3 Phone: s 9(2)(a)

1.3.4 Email address: s 9(2)(a)

1.3.5 Postal address (if preferred method of contact):

If you are making this application on behalf of the applicant, please attach evidence that you are authorised to make this application.

1.3.6 Please direct all correspondence relating to this application (including correspondence from MfE) to:

Applicant(s)

If selecting Applicant and there is more than 1 person who lodged the referral application, please identify 1 person to receive all correspondence on behalf of all applicants.

Agent for applicant:

1.4.1 Compliance and enforcement history – repeat for all applicants

1.4.1 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 – see below No – proceed next

1.4.2 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.

Section 2: Referral application summary

2.1 Project name

This is the name by which the project will be known publicly. For example - avoid using street addresses, place names, company names.

2.2 Project description and location

2.2.1 Provide a description of the project and the activities it involves

The project description helps us with inviting comments from relevant parties on the application, and publishing information about the application.

The purpose of this application is to renew the consents for the Mangahao Hydro-Electric Power Scheme (Mangahao HEPS or The Scheme) to maintain the renewable generation of electricity in the Manawatu Region. Renewing The Scheme enhances the energy security of the region and country, while diversifying New Zealand's energy portfolio.

The Mangahao HEPS is owned by King Country Energy Limited (KCE) and operated by Manawa Energy Limited (Manawa). The Scheme was initially completed in 1924 and is located in the northern section of the Tararua Ranges. It generates up to a maximum 39.9 MW of electricity with an average annual output of 131 GWh, which is enough to power approximately 20,000 homes. The Scheme also materially contributes to greenhouse gas emission reductions of between 67,830 tCO₂-e (for gas) or 172,208 tCO₂-e (for coal).

Water for the Scheme is sourced mainly from the upper part of the Mangahao River, which is a tributary to the Manawātū River. The Mangahao River is diverted by a dam, two tunnels and penstocks to a power station on the Mangaore Stream. Diverted water from the upper Mangahao River is conveyed to the Mangahao Power Station past the upper Tokomaru River where another dam intercepts the small catchment there. Its flow, together with the diverted flow from the upper Mangahao River, is diverted to the power station by the second tunnel and steel penstocks. Generation discharge is released into the Mangaore Stream which flows into the Manawatu River 8.7 km downstream of the power station tailrace.

The operating regime for the Mangahao HEPS will remain the same as currently authorised.

The application involves the following activities which require resource consent as a controlled activity pursuant to the Horizons Regional Council One Plan:

- The discharge of water to water
- Discharge of contaminants to water
- The take and use of water (including non-consumptive take)
- The damming and diversion of water
- The use of structures in the bed of a stream or river.

2.2.2 Provide a description or map of the whole project area that identifies its boundaries in sufficient detail to enable consideration of the referral application.

For example, site address(es), certificate of title(s), shape files

The Scheme is sited near the northern end of the Tararua Ranga on its western side,

roughly 15 km north-east of Levin and 28km south-west of Palmerston North.

A Scheme Map showing the location and parcel boundaries is attached as **Attachment Two**.

The relevant certificates of title are attached to this application as **Attachment Three**.

2.3 Ineligible activity

Your referral application must demonstrate that the project does not involve any ineligible activities as defined in Section 5 of the Act. Please consider each ineligible activity below and where relevant, provide the requested details.

When providing your response below, where possible, **provide details of any parties involved, the extent of their holding and the activity relevant to their area.**

Where a project involves an activity that may be the subject of a determination under sections 23 or 24, and you are intending to seek a Ministerial determination for that activity under either section, you must still complete this section in full. Determinations under, and information required in respect of, sections 23 and 24 are covered further under 2.5 Ministerial determinations under sections 23 and 24.

If your application relates to certain mining activities below the surface of the land and meets the other relevant criteria under section 5(2) of the Act then an agreement under section 5(1)(a), (b), (j) or (k) may not be required. This should be identified under the relevant questions below, and you must provide the additional information required in respect of section 5(2) under 2.3 Ineligible activity.

2.3.1 Does the project include an activity that would occur on identified Māori land as defined in section 4 of the Act?

Yes – see below No – proceed next

The Scheme does not involve any ineligible activities This is because:

- The Scheme's components and infrastructure that are being reconseented are on land owned by KCE Mangahao Limited, with the exception of the tunnels.¹
- However, this is not an issue as the land through which the tunnels pass is not caught by the ineligible activity provisions under the FTA and KCE is not reconseenting the tunnels.
- Where the Scheme's components are on river or lake beds adjoining KCE owned land the river or lake beds are owned by the Crown.
- There is no identifiable Māori land or Māori customary land in the vicinity of the Scheme.
- The conservation areas and state forest within the vicinity of the Scheme are not captured by the definition of ineligible activities in the FTA.

a. If yes, please address the following:

- i. identify the land involved and the owner(s) of the land.
- ii. Confirm that the activity on the land has been agreed with the owners of the land and

¹ KCE is the 100% shareholder of KCE Mangahao Limited
Fast-track Approvals Referral Application Form

provide evidence of the written agreement; or

- A. advise whether it is proposed to seek a determination under section 23 and provide the information under 2.5 Ministerial determinations under sections 23 and 24 below; or
- B. advise whether it is proposed to rely on section 5(2) of the Act and provide the information under 2.3 Ineligible activity below.

2.3.2 Does the project involve an activity that would occur in a customary marine title area?

Yes – see below No – proceed next

a. Address the following:

- i. Identify the relevant customary marine title area, who the customary marine title group is;
- ii. Provide evidence that written agreement has been obtained from the customary marine title group and provide a copy of the same; **or**
 - A. advise whether it is proposed to rely on section 5(2) of the Act and provide the information under 2.3 Ineligible activity below.

2.3.3 Does the project involve an activity that would occur in a protected customary rights area?

Yes – see below No – proceed next

a. Address the following:

- i. Identify the protected customary rights area, the group who holds these rights and the nature of the protected customary right(s)
- ii. Explain your proposed activity and identify whether you consider that it would have a less than minor adverse effect on the exercise of the protected customary right(s), and briefly explain why; **or**
- iii. Advise whether you consider that your proposed activity would have a more than minor effect on the exercise of the protected customary right(s), and if so, confirm that the activity has been agreed to in writing by the protected customary rights group and provide a copy of that agreement.

2.3.4 Does the project involve an activity that would occur on: Māori customary land; OR land set apart as a Māori reservation as defined in section 4 of Te Ture Whenua Māori Act 1993.

Yes – see below No – proceed next

2.3.5 Does the project involve an aquaculture activity or an activity that is incompatible with aquaculture activities that would occur within an aquaculture settlement area (under section 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004); or an area reserved under another Treaty settlement for the aquaculture activities of a particular group?

Yes – see below No – proceed next

2.3.6 Provide details of the aquaculture activity or the activity that is incompatible with aquaculture and the location.

2.3.7 Provide details of the relevant aquaculture settlement area or Treaty settlement legislation reserving space for aquaculture and include details of the impacted parties or particular group.

2.3.8 Provide details on whether or not the applicant is authorised to apply for a coastal permit within the aquaculture settlement area, or area reserved under another Treaty settlement for aquaculture activities, including a copy of any such authorisation.

2.3.9 Does the project include an activity that would require an access arrangement under section 61 or 61B of the Crown Minerals Act 1991?

Yes – see below No – proceed next

a. Provide the following information:

- i. what is the activity that would require the access arrangement; and
- ii. does the project include an activity that would occur on Crown owned land or internal waters and land of the common marine and coastal area described in Schedule 4 of that Act and provide details of the same.
- iii. If so describe how the activity meets the criteria in section 61(1A)(a-e) of the Crown Minerals Act 1991; **or**
- iv. Confirm and provide evidence that the project would not occur in an area for which a permit cannot be granted under that Act:

2.3.10 Does the project include an activity that would be prevented under any of sections 165J, 165M, 165Q, 165ZC, or 165ZDB (regarding the management of occupation in common marine and coastal area) of the Resource Management Act 1991?

Yes – see below No – proceed next

2.3.11 Provide details about which section the project does not comply with and, if relevant, the provisions of the regional coastal plan that are applicable.

2.3.12 Does the project include an activity (other than an activity that would require an access arrangement under the Crown Minerals Act 1991) that would occur on land that is listed in Schedule 4 of this Act?

Yes – see below No – proceed next

a. Provide the following:

- i. identify the activity and which clause under Schedule 4 is applicable; and
- ii. confirm whether you are seeking that the Minister make a determination under section 24, and if so, whether the determination sought relates to existing electricity infrastructure or new electricity lines and provide the information under 2.5 Ministerial determinations under sections 23 and 24 below.

2.3.13 Does the project involve an activity that would occur on a national reserve held under the Reserves Act 1977 and requires approval under that Act?

Yes – see below No – proceed next

a. Address the following:

- i. identify the activity and type of national reserve under the Reserves Act
- ii. identify what approval(s) would be required under the Reserves Act.
- iii. Confirm whether you are seeking that the Minister make a determination under section 24 and if so whether the determination sought relates to existing electricity infrastructure or new electricity lines.? If so, provide the information under 2.5 Ministerial determinations under sections 23 and 24 below

2.3.14 Does the project involve an activity that would occur on a reserve held under the Reserves Act 1977 that is vested in someone other than the Crown or a local authority?

Yes – see below No – proceed next

a. Address the following:

- i. identify the activity, the reserve type under the Reserves Act, and the person in whom it is vested.
- ii. provide evidence that written agreement has been obtained from the person in whom the reserve is vested and provide a copy of the same; or
- iii. advise whether it is proposed to rely on section 5(2) of the Act and provide the information under 2.3 Ineligible activity below.

2.3.15 Does the project involve an activity that would occur on a reserve held under the Reserves Act 1977 that is managed by someone other than the Department of Conservation or a local authority?

Yes – see below No – proceed next

a. Address the following:

- i. identify the activity, the reserve type under the Reserves Act, and the person or body who manages the reserve.
- ii. Provide evidence that written agreement has been obtained from the person or body responsible for managing the reserve and provide a copy of the same; **or**
- iii. advise whether it is proposed to rely on section 5(2) of the Act and provide the information under 2.3 Ineligible activity below; **or**
- iv. advise whether you consider the activity falls within the scope of section 5(5) of the Act, and provide the information under 2.3 Ineligible activity below.

2.3.16 Does the project involve an activity that is:

a. a prohibited activity under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012 or regulations made under that Act?

Yes – please explain No – proceed next

b. described in section 15B (Discharge of harmful substances from ships or offshore installations) of the Resource Management Act 1991 and is a prohibited activity under that Act or regulations made under it;

Yes – please explain No – proceed next

c. prohibited by section 15C (Prohibitions in relation to radioactive waste or other radioactive matter and other waste in coastal marine area) of the Resource Management Act 1991

Yes – please explain No – proceed next

2.3.17 Does the project involve a decommissioning-related activity as described in section 38(3) of the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012:

Yes – please explain No – proceed next

2.3.18 Does the project involve an activity undertaken for the purposes of an offshore renewable energy project?

Yes – please explain No – proceed next

2.4 Exemptions from requirement to provide agreement

2.4.1 Mining activities under section 5(2)

The agreement of the relevant groups referred to under 3.5. Persons affected is not required for certain mining activities under section 5(2). If you think this might apply to your application, answer the questions below.

2.4.1.2 Is your application for an activity that is prospecting, exploration, mining or mining operations of Crown-owned minerals undertaken below the surface of any land or area?

Yes –see below No – proceed next

2.4.1.3 Provide details of the activity and identify the owner and occupier of the land and any relevant details concerning the land or area (such as whether it is identified Māori land)

2.4.1.4 Explain the extent, if any to which your activity may be likely to cause any damage to the surface of the land or any loss or damage to the owner or occupier of the land.

2.4.1.5 Explain the extent, if any to which your activity will be likely to have any prejudicial effect in respect of the use and enjoyment of the land by the owner or occupier of the land.

2.4.1.6 Explain the extent, if any to which your activity will be likely to have any prejudicial effect in respect of any possible future use of the surface of the land, and if no such effects are anticipated, please explain why.

2.4.2 Activities on land proposed to be the subject of a land exchange

The agreement of relevant groups referred to in (subsection 5(1)(a) of the Act) is not required if section 5(5) applies. If you consider this section may be relevant to your application, complete the below.

2.4.2.1 Is the reserve on which the activity is to occur proposed to be the subject of a land exchange?

Yes No

2.4.2.2 Is the reserve a Crown-owned reserve?

Yes No

2.4.2.3 Are the person or persons responsible for managing the reserve in place because of a Treaty settlement?

Yes No

2.4.2.4 Provide any supporting details which may be relevant for your responses to the above questions.

[This is not relevant for this application.](#)

2.5 Ministerial determinations under sections 23 and 24

Complete this section if you wish to seek a ministerial determination under section 23 or section 24 that your project is not an ineligible activity.

2.5.1 Determination in relation to linear infrastructure on Māori land under section 23

2.5.1.1 Is your application seeking a determination under section 23 (linear infrastructure on certain identified Māori land)

Yes – see below No – proceed next

Provide the following information:

2.5.1.2 Confirmation that the activity is the construction of electricity lines or land transport infrastructure (and identify which it is)

2.5.1.3 Confirmation that the above construction (or operation of) will be undertaken by a network utility operator that is a requiring authority, and that that same party is the applicant for the necessary approvals, providing details of the same.

2.5.1.4 Confirmation that the activity would occur on identified Māori land that is Māori freehold land or General land owned by Māori that was previously Māori freehold land (and identify that land)

2.5.1.5 Provide information on the rights and interests of Māori in that land

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2.5.1.6 Provide an assessment of the effects of the activity on those Māori rights and interests and on the relevant land.

2.5.2 Determination in relation to existing electricity infrastructure under section 24(2)

2.5.2.1 Is your application seeking a Ministerial determination under section 24(2) (in relation to maintenance, upgrading, or continued operation of existing electricity infrastructure on certain Schedule 4 land or in a national reserve)

Yes – see below No – proceed next

Provide the following information:

2.5.2.2 Confirmation that the activity is the maintenance, upgrading, or continued operation of existing electricity infrastructure.

2.5.2.3 Confirmation that the activity would occur on eligible land, as defined in section 24(3).

2.5.2.4 Advise whether the activity would materially increase the scale or adverse effects of the existing electricity infrastructure and provide an explanation of the same.

2.5.3 Determination in relation to new electricity lines under section 24(4)

2.5.3.1 Is your application seeking a determination under section 24 (the construction and operation of new electricity lines on eligible land (as defined in schedule 4 excluding land classified as a national park or listed in subsections 2, 4, 5(a), 7 or 8 of that schedule)?

Yes – see below No – proceed next

Provide the following information:

2.5.3.2 Is the activity the construction and operation of new electricity lines?
(provide any necessary details)

Would the activity occur on eligible land (and identify which category of eligible land);

2.5.3.3 Provide the requested information for each alternative site considered for the construction and operation of the new electricity lines:

- 2.5.3.4 A description of the alternative site.
- 2.5.3.5 A statement of the anticipated and known financial cost of undertaking the activity on the alternative site.
- 2.5.3.6 A description of the anticipated and known adverse effects of undertaking the activity on the alternative site.
- 2.5.3.7 A description of the anticipated and known financial cost and practicality of available measures to avoid, remedy, mitigate, offset, or compensate for the anticipated and known adverse effects of the activity on the alternative site.
- 2.5.3.8 A description of any issues (including financial cost) that would make it impractical to undertake the activity on the alternative site.
- 2.5.3.9 An assessment of whether it would be reasonable and practical to undertake the activity on the alternative site, considering the matters referred to above.

2.6 Appropriateness for fast-track approvals process

Here you must explain how the project meets the referral application criteria (section 22). Please consider and respond where relevant, to each question.

If the project is planned to proceed in stages, you must explain how each stage meets the referral application criteria.

If a part of the project is proposed as an alternative project, you must explain how each stage meets the referral application criteria,

- 2.6.1 The criteria for accepting a referral application is that the project is an infrastructure or development project that would have significant regional or national benefits. Explain how this project satisfies the criteria:

The Mangahao HEPS is considered regionally and nationally significant infrastructure by supplying controlled renewable energy generation directly to the local region and excess into the national grid. The region (and NZ) have depended on this generation for over 100 years and can provide generation for another 100-200 years.

The provision of, and access to, secure and reliable renewable electricity is of critical importance to the social and economic wellbeing of the Horizons Region, and all New Zealanders. Mangahao generation is equal to approximately 63-64% of the electricity load met by the Mangahao grid exit point (GXP) during the morning and evening peak loads. The Scheme will continue to contribute to the security of electricity supply in the Horizons Region (given it is embedded into the local electricity network), as well as contribute to the Government's strategic targets for renewable electricity generation and the decarbonisation of the New Zealand economy

The National Policy Statement for Renewable Energy Generation (NESREG) provides that decision makers shall recognise and provide for the national significance of renewable energy generation activities. It also provides that matters of national significance include the need to develop, operate, maintain and upgrade renewable electricity generation activities. Given that the NPSREG acknowledges the importance of renewable energy infrastructure and the benefits derived from said infrastructure, it

follows that the Scheme delivers nationally significant infrastructure.

The key regional and national benefits for New Zealand in summary 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 \$130 million) and new peaker (“on/off”) generation (probably gas fueled thermal at a cost of \$60 million) to address the mismatch between wind output and the Scheme. Grid scale batteries 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. We estimate 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 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 capacity.
- Maintaining economic activities associated with operation of the scheme to the benefit of **local suppliers of labour**, goods and service

2.6.2 Explain how referring the project to the fast-track approvals process:

2.6.2.1 Would facilitate the project, including by enabling it to be processed in a more timely and cost-effective way than under normal processes; and

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, a decision often seeks to create a ‘compromise’ with higher minimum flows and expensive mitigation are set to appease interested parties and often net no value add to the environment. These types of restrictions have the potential to result in a significant loss of energy production. The experience of KCE and Manawa is that the normal RMA process for re-consenting is lengthy, costly and more onerous. Re-consenting processes are taking upwards of five 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, KCE and Manawa’s experience includes the following re-consenting examples:

- Mangorei Hydro-Electric Power Scheme – application lodged in November 2020. As at May 2025, Manawa awaits prehearing conference dates with submitters.
- Motukawa Hydro-Electric Power Scheme – application lodged in November 2021. As at May 2025, Manawa awaits prehearing conference dates 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** – consents expire in 2029.

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

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

These costs and delays are particularly frustrating in the case of the Scheme, which is a controlled activity. This means that consent cannot be declined. However, interested parties often seek to limit the duration to a short time period such as 10 years, which means that consent will need to be applied for again in less than 10 years’ time. Given the time and cost involved to obtain consent in the first place, a short consent duration (i.e. less than the maximum duration under the RMA of 35 years) is a significant concern for KCE. 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.

Referring the project would enable it to be processed quicker under FTAA, even though it is a controlled activity

The controlled activity status does not deliver a more efficient consenting process, as demonstrated by the Government’s introduction of the FTAA which specifically aims to enable and encourage the renewable energy sector to use fast-track pathways for re-consenting. The majority of all hydro schemes in NZ are controlled activity status.

There are currently three hydro re-consent applications that were listed in FTAA, all of which are classified as controlled activity status. Genesis’ Tekapo Hydro re-consent has lodged its substantive application and is now with a panel. Manawa’s own Wheao and Kaimai hydro re-consents were also listed under the FTAA in late 2024, and Manawa will lodge the substantive application for Kaimai within the next month. Both of these applications are also controlled activities. KCE/Manawa’s Kuratau referral has been accepted as compliant and is now awaiting Minister approval.

This highlights that controlled activity status alone does not ensure an efficient consenting process, which is why the Government introduced the FTAA — to

provide a more streamlined and effective pathway for the consenting of renewable energy infrastructure.

KCE considers that the fast-track process will ensure the project can be processed in a significantly more timely manner than under the RMA and that the controlled activity status does not result in a more efficient consenting process. The reasons for this are set out below.

Extensive matters of control

For the controlled activity rule, the matters over which Horizons Regional Council has reserved control are extensive and require comprehensive supporting technical reports².

KCE/Manawa's experience with the consenting of other hydro-schemes over the last five years is that controlled activity status still results in numerous section 92 requests from consent authorities, additional processing time due to the need for consent authorities to obtain external peer review and advice, and complex and lengthy hearings which adds further time and cost to the process.

While the controlled activity status provides certainty that the application will be granted, it does not guarantee that operations can continue to generate the levels of energy the scheme was designed for 100 years ago, nor that the scheme will remain economically viable or that the consent process will be more efficient.

A controlled activity consent can still result in onerous or impractical conditions that ultimately reduce generation capacity. In contrast, the Fast Track process offers a more timely and efficient pathway, with clear statutory timeframes and greater assurance that consent conditions will not undermine the viability of this important renewable energy infrastructure. The New Zealand Government's own data shows that, on average, consenting for renewable energy projects—whether controlled or otherwise—takes between 2 and 5 years.

² The matters of control in Rules LF-AWBD-R61, LF-TUD-R44, LF-LW-R37 are:

- Fish Passage
- Water levels, flow regimes and minimum flows
- Measures to manage land stability and erosion
- Measures to assist with maintaining or achieving the RP-SCHED 5 water quality targets for the Upper Mangahao, Upper Tokomaru and Mangaore Water Management Sub-Areas
- Measures to avoid, remedy, or mitigate any adverse effects on the Values of the water body at and below the point of discharge dam
- Measures to avoid, remedy, or mitigate any adverse effects on the instream geomorphological components of natural character of the water body
- Management of dam failure
- Effects on rare habitats, threatened habitats and at-risk habitats and Sites of Significance – Aquatic
- Measures to avoid, remedy, or mitigate adverse effects on tangata whenua values / matters
- Duration of consent
- Review of consent conditions
- Compliance monitoring
- The matters in Policy RP-LF-LW-P12
- The volume and rate of water taken, and the timing of the take
- The location of take
- Intake velocity and screening requirements
- Compliance with minimum flows
- Measures to control flooding and erosion
- Contaminant concentrations and loading rates
- Measures required to comply with section 107(1) RMA
- Maintenance and contingency requirements
- Monitoring and information requirements.

No operational changes are proposed for Mangahao HEPS

No changes are sought for the Mangahao HEPS. There are not expected to be any change in environmental effects. However, the Mangahao HEPS will be publicly notified under the RMA and require a substantive hearing. Given there are no changes to the Scheme, the RMA process is costly, onerous and significantly lengthy to re-consent the same activity due to the public notification and hearing process requirements under the RMA, and subsequent appeal rights. 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.

Appeals for controlled activities

Parties may still lodge appeals to the Environment Court in respect of conditions for a controlled activity, and these appeals often relate to hydrological, fish passage, ecological, erosion and cultural matters. As the consent conditions govern the key activities of a hydro-electric power scheme (i.e. operational matters, rates of flow, take and discharge, river and lake levels, ecological responses etc), hearings on conditions can require the same level of substantive evidence as new consents.

KCE/Manawa's experience is that appeals to the Environment Court on conditions are as costly and extensive as appeals on the decision to grant consent as a discretionary activity. An Environment Court appeal for a complex matter such as a hydro-electric power scheme can require lengthy hearing times, which also requires additional resources from the Court system and difficulties finding available Court hearing time in a timely manner.

For example, Manawa's Matahina Hydro-electric Power Station was a controlled activity to re-consent its operations. The application was lodged in 2009 and consent was ultimately granted in 2014 following an Environment Court appeal on the consent conditions. Resolving the matter required four Environment Court mediations over a lengthy period, which added time and cost to the process.

The issue of term is also a live issue for a controlled activity, meaning parties can seek a shorter term than sought by KCE (being 35 years). This can also be a matter for an appeal to the Environment Court. The Mangahao HEPS 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 statutory timeframes under the fast-track process will both ensure a more prompt decision due to the timeframes on the expert consenting panel, but also removes the ability to appeal to the Environment Court, which is a significantly timely process.

2.6.2.2 Is unlikely to materially affect the efficient operation of the fast-track approvals process

Expert reports are in the process of being finalised, and the Assessment of Environmental Effects will follow shortly thereafter. If the project is referred, an application could be lodged within short order. Therefore, referring this project will not affect the efficient operation of the fast-track process.

2.6.2.3 Has the project been identified as a priority project in a central government, local government, or sector plan or strategy (for example, in a general policy statement or spatial strategy), or a central government infrastructure priority list?

For example – a sector plan that specifically identifies the project including details such as location.

Yes – see below No – proceed next

a. Identify the plan, strategy or list (or any other relevant document).

While the Scheme itself has not been specifically identified, the National policy document *Electrify NZ* notes that re-consenting for existing generation assets has become unnecessarily difficult. Granting a referral order for the re-consenting of this Scheme to go through the FTA would be consistent with that policy.

2.6.2.4 Will the project deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure?

Yes – see below No – proceed next

a. Explain how the project will deliver this.

The Mangahao HEPS is a regionally and nationally significant infrastructure (as described at 2.6.1 above). Reconsenting will enable the continued functioning of this important source of renewable energy.

2.6.2.5 Will the project increase the supply of housing, address housing needs, or contribute to a well-functioning urban environment (within the meaning of policy 1 of the National Policy Statement on Urban Development 2020). If yes, explain how the project will achieve this.

This is not applicable to this application.

2.6.2.6 Will the project deliver significant economic benefits, and if so, how?

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 \$4-6 million. Most of the cost 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 straight up loss for NZ and one of the main arguments for fast-track consenting. Reconsenting the Mangahao Scheme will help support the regional New Zealand economy.

The Scheme's replacement cost is \$541million and has a regular valuation of \$126million. Past re-consenting processes have resulted in a significant loss in

generation due to required recreational release flows at two dams and discharge requirements. Previous consenting of other schemes through the RMA has shown up to 4-7% loss generation and these were prior to the 2020 NPS-FM and NES policies, which now have stricter requirements for river restoration. Losing even 7% of water through a re-consenting process is 9GWh of lost generation, and the cost to replace that generation would be \$190 million for new generation investment, which would be required to fill the shortfall and increasing demand.

Mangahao powers ~20,000 homes in the Horowhenua District

The Mangahao HEPS is located near Shannon in the Horowhenua District which is part of the Manawatū-Wanganui (Horizons) Regional Council area. 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 generation is equal to approximately 63-64% of the electricity load met by the Mangahao GXP during the morning and evening peak loads.

Mangahao 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 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 \$130 million) and new peaker (“on/off”) generation (probably gas fueled thermal at a cost of \$60 million) to address the mismatch between wind output and the Scheme. Grid scale batteries 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. We estimate 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 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 capacity.
 - Maintaining economic activities associated with operation of the scheme to the benefit of **local suppliers of labour, goods and service**
- 2.6.2.7** Will the project support primary industries, including aquaculture, and if so, how?

This is not applicable for this application.

- 2.6.2.8** Will the project support development of natural resources, including minerals and petroleum, and if so, how?

This is not applicable for this application.

- 2.6.2.9** Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions, and if so, how?

The ongoing operation of the Mangahao HEPS contributes towards decarbonising New Zealand’s economy. It will also contribute to achieving the 90% renewable energy target by 2025 set out in the National Policy Statement for Renewable Electricity Generation and the aspiration to achieve 100% renewable energy by 2030.

The Mangahao HEPS has an important role in achieving New Zealand’s 2050 targets in the Climate Change Response Act 2022. The Mangahao HEPS will also play a role in substituting fossil fuel energy with renewable energy. That amounts to real emissions reduction, especially as New Zealand’s electricity cannot be imported, and therefore it will contribute to reductions in the country’s greenhouse gas inventory. Economic analysis by NZEIR indicates greenhouse gas emission reductions at the Mangahao HEPS of approximately 67,830 tCO₂-e (for gas) or 172,208 tCO₂-e (for coal).

The NPSREG provides for renewable electricity generation, including its benefit of maintaining or increasing electricity generation capacity while avoiding, reducing or displacing greenhouse gas emissions, as a matter of

national significance (Policy A). The preamble to the NPSREG notes “the contribution of renewable electricity generation, regardless of scale, towards addressing the effects of climate change plays a vital role in the wellbeing of New Zealand, its people and the environment”. The Mangahao HEPS is entirely consistent with that national direction.

2.6.2.10 Will the project support climate change adaptation, reduce risks arising from natural hazards, or support recovery from events caused by natural hazards, and if so, how?

As a generator of electricity, KCE is recognised as a lifeline utility under the Civil Defence Emergency Management Act 2002 (Schedule 1, Part B). Lifeline utilities play a vital role in recovery from natural hazards, and have statutory duties such as the need to ensure the ability to function to the fullest possible extent, even though this may be at a reduced level, during and after an emergency. This includes the Mangahao HEPS.

As New Zealand de-carbonises and shifts its view to achieving a high percentage of energy generation coming from renewable sources (as set out in the response to question 2.6.2.9 above) it is vital that existing renewable energy generation is preserved. The project seeks to re-consent the Scheme, which contributes towards New Zealand’s current renewable electricity generation and in doing so supports the country’s climate change adaptation.

2.6.2.11 Will the project address significant environmental issues, and if so, how?

Although the Mangahao HEPS has not been assessed as causing any significant environmental issues, it is noted that the Scheme has significance as a generator of renewable electricity, supporting the reduction of greenhouse gas emissions.

2.6.2.12 Is the project consistent with local or regional planning documents, including spatial strategies, and if so, how?

Mitchell Daysh are carrying out a full planning assessment of the project against the relevant statutory and non-statutory planning documents. Based on an initial assessment, the Mangahao HEPS is consistent with the relevant regional planning documents as follows:

The Regional Policy Statement (RPS) and the Regional Plan, included as part of the Horizons One Plan, are the relevant regional planning instruments for the Manawatu-Wanganui Region. Infrastructure activities with effects on freshwater, natural character values, biodiversity and/or public access must be managed to mitigate the effects. However, the RPS is clear in its express recognition of and provision for significant infrastructure with local effects but regional or national benefits – particularly where the infrastructure already exists. The RPS policy settings directly inform the Regional Plan provisions, which require environmental effects to be managed while enabling the continued operation of existing significant infrastructure.

No relevant local planning instruments (including spatial strategies) have been identified, noting that no replacement consents are sought under the Horowhenua District Plan.

Section 3: Project details

Remember: at this stage only a general level of detail is required, enough to inform eligibility to use the fast-track approvals process.

For construction activities, please state the anticipated commencement and completion dates.

There are no construction activities planned as part of this application.

3.1 Approvals required

Applications must specify all of the proposed approvals sought but only need to provide a general level of detail about each proposed approval, sufficient to inform the Minister's decision on the referral application.

For each proposed approval an applicant must be eligible to apply for any corresponding approval under a specified Act. For example, if an approval is for a notice of requirement under the RMA, the applicant for that approval would need to be a requiring authority.

Applications for approvals under a specified Act, as required by in [section 13\(4\)\(y\)](#), are covered below in 3.8 Specific proposed approvals.

3.1.1 Outline the approvals sought under the Resource Management Act 1991.

The Scheme involves the following activities which may not occur unless permitted under the regional rules or authorised by a resource consent:

- The discharge of water to water
- Discharge of contaminants to water
- taking, use, damming and diversion of water – s14 RMA; and
- use of structures within a river – s13 RMA.

As these activities are not permitted to occur as of right under the regional rules, renewal of the existing resource consents authorizing the operation of the Mangahao HEPS is sought.

3.1.2 Outline the approvals sought under the Conservation Act 1987

Not applicable – no approvals necessary for the Mangahao HEPS.

3.1.3 Outline the approvals sought under the Reserves Act 1977

Not applicable – no approvals necessary for the Mangahao HEPS.

3.1.4 Outline the approvals sought under the Wildlife Act 1953

Not applicable – no approvals necessary for the Mangahao HEPS.

3.1.5 Outline the approvals sought under the National Parks Act 1980

Not applicable – no approvals necessary for the Mangahao HEPS.

3.1.6 Outline the approvals sought under the Heritage New Zealand Pouhere Taonga Act 2014

Not applicable – no approvals necessary for the Mangahao HEPS.

3.1.7 Outline the approvals sought under the Freshwater Fisheries Regulations 1983

Not applicable – no approvals necessary for the Mangahao HEPS.

3.1.8 Outline the approvals sought under the Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012

Not applicable – no approvals necessary for the Mangahao HEPS.

3.1.9 Outline the approvals sought under the Crown Minerals Act 1991

Not applicable – no approvals necessary for the Mangahao HEPS.

3.1.10 Outline the approvals sought under the Public Works Act 1981

Not applicable – no approvals necessary for the Mangahao HEPS.

3.1.11 *Only applicable if more than one applicant:* Provide a statement of which approvals are proposed to be held by which applicant.

3.1.12 Where there are any particular eligibility requirements to apply for an above approval; identify what they are, who the relevant applicant is, and confirm that the relevant applicant meets those requirements (including providing any necessary supporting information or documentation to evidence this).

Not applicable – there are no eligibility requirements for the necessary approvals for the Mangahao HEPS.

3.1.13 Are there any other types of consents, certificates, designations, concessions, and other legal authorisations (other than contractual authorisations or the proposed approvals) and you consider are needed to authorise the project (including any that may be needed by someone other than you as the applicant(s)). Provide details on whether these have been obtained.

Not applicable.

3.2 Project stages

3.2.1 If the project is planned to proceed in stages, provide:

1. A statement of whether the project is planned to proceed in stages, including:
 - a. an outline of the nature, scale and timing of the stages; and
 - b. a statement of whether you intend to lodge a separate substantive application for each of the stages.
 - i. If a substantive application is intended to be lodged for each stage, address the questions under the section (Appropriateness for fast-track approvals process) for each stage of the project

Not applicable – the scheme is in existence and no works or staging is proposed.

3.3 Alternative project

3.3.1 If the project is proposed as an alternative project, provide:

1. A statement of whether a part of the project is proposed as an alternative project in itself; and
 - a. Describe that part of the project; and
 - b. Explain how that part of the project proposed as an alternative project meets the

referral assessment criteria in section 22 of the Act.

Not applicable – the scheme is in existence and no works are proposed.

3.4 Adverse effects

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

KCE has engaged the following experts to prepare full expert assessments relating to the matters of control:

- Assessment of Environmental Effects – Mitchell Daysh
- Statutory Planning Assessment – Mitchell Daysh
- Economics Assessment – New Zealand Institute of Economic Research
- Hydrology Assessment – Tonkin & Taylor
- Sedimentation and River Hydraulic Assessment – Tonkin & Taylor
- Aquatic Ecology and Water Quality Assessment – Tonkin & Taylor
- Fish Habitat and Fish Passage Assessment – Tonkin & Taylor
- Terrestrial Ecology 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.

- **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.
- **Sedimentation and River Hydraulic 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 Tonkin & Taylor 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** – KCE are not proposing any changes 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. Its 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, taking into account 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 considered to be low.
- **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.
- **Recreation Effects** – Rob Greenway & 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.
- **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 consenting.

3.4.2 Provide a statement of any activities involved in the project that are prohibited activities under the Resource Management Act 1991, and identify the relevant prohibited activity provision.

Not applicable – no activities associated with the operation of the Mangahao HEPS are prohibited.

3.5 Persons affected

3.5.1 Provide a list of the persons, groups and/or entities who you consider are likely to be affected by the project.

The list should include, as relevant, local authorities, relevant Māori groups (as set out at section 13(4)(j)(ii)-(vii) of the Fast-track Approvals Act 2024), persons with a registered interest in land that may need to be acquired under the Public Works Act 198; and if the project includes a land exchange, the holder of an interest in the land that is to be exchanged by the Crown (see Consultation requirements for referral application).

The following lists the Māori entities who are considered likely affected by the project:

- Ngāti Whakatere
- Rangitāne o Manawatū
- Muaūpoko
- Ngāti Whakatere

- Ngāti Kahungunu ki Tamaki-nui-ā-Rua
- Rangitāne Tamaki nui-ā-Rua
- Rangitāne o Wairarapa
- Ngāti Raukawa ki te Tonga

The following lists the non-Māori stakeholders who are considered likely affected by the project:

- Department of Conservation
- Fish & Game
- Recreationalists
- Horizons Regional Council

The applicant notes that the FTAA requires consultation with local authorities and the Ministry for the Environment, though they are not directly affected by this application and are noted below:

- Ministry for the Environment
- Horowhenua District Council.

3.5.2 Provide a summary of any consultation undertaken with 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 of the Act, **and** how the consultation has informed the project.

Since 2020, KCE 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.

Tangata Whenua Engagement

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

Engagement on the Mangahao re-consent has included in-depth hui involving KCE technical specialists and Ngāti Whakātere cultural and technical experts, presentations of ecological and environmental findings, and funding support for Ngāti Whakātere ecologists and experts to undertake independent sampling. Between 2020 and 2024, KCE and Ngāti Whakātere participated in multiple site visits and hīkoi across their rohe. KCE has resourced the development of a Cultural Impact Assessment, which is currently underway.

Specific to the Fast-track consenting process, KCE informed Ngāti Whakātere 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 was not included in the initial schedule but that a referral application would be submitted under the new Act in 2025. In November 2024, KCE and Manawa representatives met with Ngāti Whakātere 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.

Rangitāne o Manawatū – KCE 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 re-consent. 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 Fast-track Approvals Referral Application Form

reconsent and to outline KCE'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, KCE informed Rangitāne o Manawatū and confirmed its intention to apply for referral under the new Act in 2025.

Most recently, in May 2025, KCE 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 indicated they would consider preparing a Cultural Impact Assessment (CIA) for the Fast-track application, and KCE has committed to resourcing this work if requested.

Muaūpoko - KCE initiated consultation with Muaūpoko in early 2023 regarding the reconsenting process and has since maintained intermittent engagement, primarily through online hui and email correspondence. KCE presented its reconsenting strategy along with details of the technical assessments underway. As part of this engagement, KCE 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 indicated they may prepare a Cultural Impact Assessment (CIA) closer to lodgement.

In July 2024, additional detail of the reconsent application was introduced, as well as the intent and timeframes for a Fast Track. Follow up correspondence notified Muaūpoko the Mangahao HEPS did not make the FT schedule, but indicated that a referral for Fast Track would be made under the new legislation in 2025. A site tour and hui was facilitated in October 2024 with multiple Muaūpoko representatives. KCE recently meet 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 - KCE initiated consultation with Ngāti Kahungunu ki Tamaki-nui-ā-Rua with a meeting at Mangahao Power Station in July 2024, where the reconsenting project was introduced and a scheme 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 did not make the Listed Project list but indicated that an application for Fast Track would be made with the new legislation. KCE are still in discussion with Ngāti Kahungunu about establishing a relationship agreement to move forward with this mahi.

Rangitāne Tamaki-nui-ā-Rua - KCE initiated consultation with Rangitāne Tamaki-nui-ā-Rua with a hui in Dannevirke in July 2024, where the reconsenting 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 evidently took place in October 2024. Email correspondence was sent which advised that the Mangahao HEPS did not make the Listed Project list, but indicated that an application for Fast Track would be made with the new legislation. KCE recently meet 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 production of a Cultural Impact Assessment.

Rangitāne o Wairarapa - KCE contacted Rangitāne o Wairarapa about reconsenting the Mangahao HEPS in June 2024. However, Rangitāne o Wairarapa did not wish to be involved further and have deferred to mana whenua.

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

Summary of How the Consultation has 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 integrated into the technical assessment programme to ensure these matters are appropriately understood and supported by robust data. These issues appear to be broadly consistent across all tangata whenua parties, with only minor variations or area-specific nuances

Building on this, hui is scheduled for winter 2025 with all of the interested tangata whenua entities to begin focused discussions on potential mitigation measures. This hui will also seek feedback and guidance from iwi on the practical and cultural considerations of implementing a native fish (tuna) trap and transfer programme, including identifying the key barriers within the scheme that may impact its effectiveness.

Engagement with Non-Māori Stakeholders

Department of Conservation (DOC) – DOC have been involved in the Mangahao HEPS through different projects and compliance activities as part of the existing consents. 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. In our experience with other re-consent applications, DOC has shown limited interest in Manawa's proposals until the substantial application is lodged, especially since no concessions are required. For other projects listed under the Fast-track process, DOC has typically responded by requesting the opportunity to review consent conditions once they become available. Although KCE has not had focused discussions with DOC specific to the Manawatū catchment, their key areas of concern across most hydro re-consents are typically consistent—centering 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.

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 response has not yet been received. Similar to DOC, Fish & Game tends to engage more actively once technical reports are finalized, especially since the scheme has been in operation for over 100 years. KCE intends to initiate a meeting to present these findings in winter 2025.

Recreationalists - KCE engage with recreationalist groups as part of the ongoing operation of the Scheme and its consent conditions to provide recreational releases at two locations within the Scheme.

Whitewater NZ - KCE maintains ongoing engagement with Whitewater NZ ahead of water releases, particularly to monitor weather conditions and ensure a safe experience. During the latter half of the current consent period, issues with the dam bypass gate escalated to the extent that releases could no longer be maintained. KCE 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 in the first half of 2026, assuming maintenance proceeds as planned. KCE met with Whitewater NZ (online) in February 2025 to discuss the upcoming re-consent application process and its intent to submit to Fast Track as well as to discuss progress on repairs to the bypass gate.

Canoe Slalom NZ – Environmental White Water Park Trust (EWWPT) - KCE maintains 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 to KCE annually, which are then agreed and confirmed through operational planning. KCE also leases a section of land adjacent to the slalom course to EWWPT, this includes the supply of water and electricity. KCE last met with EWWPT (online) in May 2025 to discuss the upcoming re-consent application through Fast

Track. EWWT expressed its desire for more water releases.

Ministry for the Environment - KCE have undertaken pre-lodgement consultation with the Ministry for the Environment (MfE) as the relevant administering agency for approvals relating to the RMA and EEZ Act. 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 in Section 3.8 below.

Horizons Regional Council – Initial discussions with Horizons Regional Council (HRC) have taken place with regard to consenting the Scheme. On 15 May 2025, KCE sent a letter inviting consultation about the referral application. Meetings are being scheduled for July/August.

Horowhenua District Council - KCE have initiated consultation with Horowhenua District Council (HDC) through a letter dated 15 May 2025, seeking comment or advice on consultation steps. KCE note that no consents are required from HDC, and HDC are not directly affected by the application. HDC provided a response on 24 May 2025, confirming their interest in participating in the process.

3.5.3 List any Treaty settlements that apply to the project area and provide a summary of the relevant principles and provisions in those settlements.

Rangitāne o Manawatu (ROM)

Rangitāne o Manawatu Claims Settlement Act 2016, Deed of Settlement of Historical Claims (Rangitāne o Manawatu) – 14 November 2015

The Mangahao HEPS is within the ROM area of interest. The Settlement acknowledges and apologizes for historic grievances which undermined the ability of ROM to access many of their traditional resources, including rivers, lakes, forests, and wetlands. The historic grievances do not specifically relate to the Mangahao HEPS or the project area.

The following statutory acknowledgement areas identified within the Settlement overlap with the Mangahao HEPS:

- Manawatū River (OTS-182-20) and tributaries. This includes the Mangahao River, which flows northeast and feeds into the Manawatū.
- Mangahao River (OTS-182-24)
- Tararua Forest Park (OTS-182-19)

Consent authorities must have regard to the statutory acknowledgement and must provide a copy of the application and a summary of the application to the ROM governance entity.

The Settlement is clear that the statutory acknowledgement only applies to the flowing body of fresh water within rivers and streams in the acknowledgement area. The statutory acknowledgement applies to the beds of navigable rivers³ owned by the Crown.

The Settlement provides for the establishment of Manawatu River Catchment Advisory Board. The Board may provide advice to the Horizons Regional Council in relation to Manawatu River and catchments freshwater management issues. The Council must have regard to any advice provided by the Board and must report back to the Board how it considered any advice.

The Settlement requires the Crown to provide a deed of recognition for specified areas, which includes the Tararua Forest Park, Manawatū River and Mangahao River. This requires the Minister of Conservation and the Director General of Conservation, or the

³ The beds of navigable rivers were vested in the Crown by the Coal Mines Act Amendment Act 1903.
Fast-track Approvals Referral Application Form

Commissioner of Crown Lands, to consult the ROM governance entity and have regard to its views if it is undertaking certain conservation management strategies and plans within the deed area. The deed of recognition only includes parts of those areas that are owned and managed by the Crown.

The settlement also provides for a conservation and taonga tutura protocol with the governance entity. Other cultural, property and financial redress are not relevant to the project or project area.

Rangitāne o Wairarapa and Rangitāne Tamaki nui-a-Rua

Rangitāne Tu Mai Ra (Wairarapa Tamaki nui-a-Rua) Claims Settlement Act 2017, Deed of Settlement of Historical Claims (Rangitane o Wairarapa and Rangitane Tamaki nui-a-Rua) - 6 August 2016

Ngāti Kahungunu ki Tamaki Wairarapa nui-ā-rua

Ngāti Kahungunu ki Tamaki Wairarapa nui-ā-rua Claims Settlement Act 2022

Rangitāne o Wairarapa and Rangitāne Tamaki nui-a-Rua, and Ngāti Kahungunu ki Tamaki Wairarapa nui-ā-rua, have statutory acknowledgements that apply to the Manawatu River and its tributaries, which includes the Mangahao River. However, the statutory acknowledgement is limited to the Rangitāne o Wairarapa and Rangitāne Tamaki nui-a-Rua, and Ngāti Kahungunu ki Tamaki Wairarapa nui-ā-rua areas of interest, which does not cover the Scheme area.

- 3.5.4** If relevant, detail any principles or provisions in the Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 that would be invoked by the project and identify which aspects of the application trigger or otherwise invoke these requirements.

[This is not applicable to this application.](#)

- 3.5.5** Will the project be located on land returned under a Treaty settlement?

Yes – see below No – proceed next

- 3.5.6** Provide evidence of written agreement by the owners of the land returned.

[This is not applicable to this application.](#)

- 3.5.7** Describe any processes already undertaken under the Public Works Act 1981 in relation to the project:

[This is not applicable to this application.](#)

- 3.5.8** Provide information identifying any parcels of Māori land, marae, or identified wāhi tapu within the project area:

[This is not applicable to this application.](#)

3.6 Legal interests

- 3.6.1** Provide a description of any legal interests you or any others applying, have in the land on which the project will occur, including a statement of how that affects your ability to undertake the work.

KCE Mangahao Limited is the registered proprietor of following parcels of land which Scheme components are located on (KCE is the 100% shareholder of KCE Mangahao Limited so there will be no issue with KCE's ability to undertake the activity on the land):

- WN50D/571;
- WN52A/813;
- WN52A/811; and
- WN52A/812.

The above parcels of land are shown on the Scheme Map attached as **Attachment Two**.

KCE is able to continue to operate those components of the Scheme located on the above properties (by virtue of KCE Mangahao Limited being the registered proprietor).

The beds of the Tokomaru No.3 Reservoir, Mangahao Lower No.2 Reservoir, and Mangahao Upper No.1 Reservoir are owned by the adjacent land owners. On the parts of reservoir beds which Scheme components are located, KCE Mangahao Limited owns the adjacent land and as such owns those parts of the reservoir bed.

The Scheme comprises of tunnels that not located on KCE Mangahao Limited owned-land. However, for the avoidance of doubt, approvals are not sought under the FTA for the tunnels (as they are existing infrastructure). What is being sought is consent to take and discharge water from the tunnels, which occurs on KCE Mangahao Limited owned-land.

3.7 Other matters

- 3.7.1** Have any activities included in the project, or any that are substantially the same as those involved in the project, previously been the subject of an application or a decision under a specified Act?

The Mangahao HEPS is authorized to operate by a number of resource consents with decisions made under the RMA. No changes are proposed to the scheme, its operation or infrastructure, as compared to that authorised under the current resource consents.

Please note the term 'application' includes a notice of requirement and any other means by which a decision may be sought under a specified Act.

Yes – see below No – proceed next

- 3.7.2** If an application has been made, provide details of the application.

This is not applicable to this application.

- 3.7.3** If a decision has been made, also provide the outcome of the decision and the reasons for it.

This is not applicable to this application.

3.7.4 Provide a description of whether and how the project would be affected by climate change and natural hazards:

Climate Change – Climate change impacts on the Scheme are being assessed by Tonkin & Taylor as part of its Hydrological Assessment. Natural variability in the climate may impact the behaviour of the Scheme and its effects on the flow regime of the waterbodies associated with the Scheme. The changes in temperatures, rainfall, drought conditions from predicted climate change has the potential to reduce the mean flows of the Manawatū River Catchment. At this stage it is not anticipated that climate change will have any material impact on the way in which the scheme operates.

Natural Hazards – The Scheme could be affected by potential earthquakes and floods. However, key structures of the Scheme are inspected and maintained to ensure that they are able to perform as intended during natural hazards. Flood risks are mitigated throughout the Scheme by a variety of structures and procedures.

3.8 Specific proposed approvals

3.8.1 Approvals under the Resource Management Act 1991

3.8.1.1 Resource consents

If your application is seeking a consent for an activity that would otherwise be applied for under the Resource Management Act 1991, including an activity that is prohibited under the Act, provide the information below:

- An assessment of the project against any relevant national policy statement, any relevant national environmental standards and, if relevant, the New Zealand Coastal Policy Statement.

Mitchell Daysh is carrying out a comprehensive planning assessment for KCE in relation to the Scheme.

The New Zealand Coastal Policy Statement is not considered relevant as the Scheme is not located in the coastal environment. The relevant national policy statements and national environmental standards are:

- National Policy Statement for Renewable Electricity Generation (NPSREG)
- National Policy Statement for Freshwater Management (NPSFM)
- National Environmental Standards for Freshwater (NESF)

NPSREG – The NPSREG seeks to enable the sustainable management of renewable energy generation under the RMA. As such the project is entirely consistent with the objectives and policies of the NPSREG, with the following noted in particular:

- The objective to provide for the development and operation of new and existing renewable electricity generation activities, such that the proportion of New Zealand’s electricity generated from renewable energy sources increases to levels that meet or exceed the Government’s national target for renewable electricity generation.
- Policy A of the NPSREG recognises the benefits associated with renewable electricity generation activities, with the listed benefits in the policy being non-exclusive.
- Policy B requiring decision-makers to have particular regard to the practical implications of achieving the national target for electricity generated from renewable energy sources.
- Policies C1 and C2 requiring decision makers to have particular regard to the practical constraints associated with the development, operation, maintenance and upgrading of new and existing renewable energy generation activities.

NPSFM – The NPSFM includes an effects management hierarchy which requires all adverse effects of a proposal to be analysed and addressed through a number of different actions. Initial assessments obtained by KCE have confirmed that all adverse effects associated with the Scheme re-consenting have been remedied and mitigated, without the need to propose any offsetting and compensation, meaning the hierarchy has been complied with.

More broadly, the NPSFM is relevant to fish passage, residual flows, water quality, the management of adverse effects on aquatic ecosystems, and the management of the effects of the Scheme on the relationship of tangata whenua with the site and waterbodies. Based on the initial expert assessments obtained, and the engagement with mana whenua to date, it is considered that the continued operation, use and maintenance of the Scheme can occur in a manner that is consistent with the NPSFM.

NESF – The NESF does not impose any additional consent requirements in relation to the re-consenting of the Scheme, as it does not apply to existing structures (nor are relevant structures classified as ‘weirs’ for the purpose of the NESF), and the take, use, damming, diversion or discharge of water for the operation or maintenance of specified infrastructure is provided for as a permitted activity.

NPSIB - The National Policy Statement on Indigenous Biodiversity does not apply to the Scheme as clause 1.3(3) of the NPS states that “nothing in this National Policy Statement applies to the development, operation, maintenance or upgrade of renewable electricity generation assets and activities and electricity transmission network assets and activities”. For the avoidance of doubt, renewable electricity

generation assets and activities, and electricity transmission network assets and activities, are not “specified infrastructure” for the purposes of this National Policy Statement.”

- Information on whether, to the best of your knowledge, there are any existing resource consents relevant to the project site to which RMA section 124C(1)(c) (existing consent would need to expire to enable the approval to be exercised) or RMA section 165ZI (space already occupied by the holder of an aquaculture permit) would apply if the approval were to be applied for as a resource consent under that Act

To the best of its knowledge, KCE is not aware of any relevant resource consents relevant to the Scheme’s site to which ss 124C(1)(c) or 165ZI RMA would apply.

3.8.1.2 *Resource consents where the project includes standard freshwater fisheries activities*

If your application is seeking a resource consent and your project includes a standard freshwater fisheries activity, provide the information requested below:

- If an in-stream structure is proposed (including formal notification of any dam or diversion structure), provide a description of the extent to which this may impede fish passage.
- Indicate whether any fish salvage activities or other complex freshwater fisheries activities are proposed.

This is not relevant for this application.

3.8.1.3 *Designations*

If your application is seeking a designation or an alteration to an existing designation for which a notice of requirement would otherwise be lodged under the Resource Management Act 1991, provide the information below:

- An assessment of the project against any relevant national policy statement, any relevant national environmental standards, or, if relevant, the New Zealand Coastal Policy Statement.

This is not relevant for this application.

3.8.1.4 *Designations where the project includes a standard freshwater fisheries activity*

If your application is seeking a designation or an alteration to an existing designation and your project includes a standard freshwater fisheries activity, provide the information requested below:

- If an in-stream structure is proposed (including formal notification of any dam or diversion structure), provide a description of the extent to which this may impede fish passage.
- Indicate whether any fish salvage activities or other complex freshwater fisheries activities are proposed.

This is not relevant for this application.

3.8.1.5 *Change or cancellation of conditions*

If your application is seeking a change or cancellation of resource consent condition that would otherwise be applied for under the Resource Management Act 1991, provide:

- Information about whether the change or cancellation of the condition is material to the implementation or delivery of the project.

This is not relevant for this application.

3.8.1.6 *Certificates of compliance*

If your application is seeking a certificate of compliance that would otherwise be applied for under the Resource Management Act 1991, provide:

information that demonstrates the activity that the certificate of compliance is intended to cover can be done lawfully in the location without a resource consent.

This is not relevant for this application.

3.8.2 Approvals relating to Conservation Act 1987, Reserves Act 1977, Wildlife Act 1953, and National Parks Act 1980

3.8.2.1 *Concessions*

For applications seeking a concession that include a lease, answer the following:

- Will the lease be for a term (including any renewals that will, or is likely to, be more than 50 years?)
 Yes – see below No – proceed next
- Will the granting of the lease trigger a right of first refusal or a right of offer or return?
 Yes – see below No – proceed next
 - If you answered yes to both a. and b. above, provide evidence that the applicant has written agreement from the holder(s) of the right of first refusal or right of offer or return to waive that right for the purposes of the proposed lease.

This is not relevant for this application.

3.8.2.2 *Land exchanges*

For applications seeking an approval for a land exchange involving conservation land, provide the details below:

- A description of both land areas proposed for exchange (for example, maps showing areas and location, addresses and legal descriptions where possible)
- The financial value of the land proposed to be acquired by the Crown

- A brief description of the conservation values of both pieces of land, including an explanation of why the exchange would benefit the conservation estate.
- If the land exchange would trigger a right of first refusal or a right of offer or return, provide evidence that the applicant has written agreement from the holder of the right of first refusal or right of offer or return to waive that right for the purpose of the land exchange
- Provide sufficient detail in respect of both land areas to confirm that no part of any land to be exchanged by the Crown is land listed in Schedule 4 or a reserve declared to be a national reserve under section 13 of the Reserves Act 1977.

This is not relevant for this application.

3.8.3 Approvals relating to complex Freshwater Fisheries activities

If your application is seeking an approval or dispensation that would otherwise be applied for under regulation 42 or 43 of the Freshwater Fisheries Regulations 1983 in respect of a complex freshwater fisheries activity provide the information requested below:

- Whether an in-stream structure is proposed (including formal notification of any dam or diversion structure), and a description of the extent to which this may impede fish passage.
- Whether any fish salvage activities or other complex freshwater fisheries activities are proposed.

This is not relevant for this application.

3.8.4 Approvals relating to Exclusive Economic Zone and Continental Shelf (Environmental Effects) Act 2012

If your application is seeking a marine consent that would otherwise be applied for under the Exclusive Economic Zone and Continental Shelf Act 2012, provide the information requested below:

- Any information relating to whether the Minister for Conservation is an affected person.
- If the applicant or the proposed holder of the marine consent has already applied for a consent under the EEZ Act in relation to the project, provide:
 - Details of any application made;
 - An explanation of any decisions made on that application; and
 - Any information that Minister may consider under section 22(6) (comparison of activity against current or likely use of the area).
- Additional information (in a summary form) about compliance or enforcement action taken against the applicant or the person who is identified in the application as the proposed holder of the marine consent by the EPA under the EEZ Act.

This is not relevant for this application.

3.8.5 Approvals relating to Crown Minerals Act 1991

3.8.5.1 Access arrangements

For an approval for an access arrangement that would otherwise be applied for under section 61 or 61B of the Crown Minerals Act 1991, provide:

Fast-track Approvals Referral Application Form

- Information that confirms the applicant or the person identified in the application as the proposed holder of the access arrangement complies with section 59(1) and (2) of the Crown Minerals Act 1991 (which applies as if a reference to an access arrangement under that Act were a reference to an access arrangement under this Act) including;
 - Evidence that the applicant or person has provided each owner and occupier of the relevant land a notice in writing of their intention to obtain an access arrangement; and
 - Evidence that the notice complies with the requirements in section 59(2) of the Crown Minerals Act, and any matters required by regulations.

This is not relevant for this application.

3.8.5.2 Mining permits

For an approval for a mining permit that would otherwise be applied for under section 23A of the Crown Minerals Act 1991, provide the information requested below:

- A copy of the relevant exploration permit or existing privilege to be exchanged for a mining permit that entitles the holder to mine a Crown-owned mineral.
- The name and contact details of the proposed permit participants and the proposed permit operator.
- A proposed work programme for the proposed permit, which may comprise committed work, committed or contingent work, or both.
- Evidence of the technical or financial capability of the proposed permit holder to comply with and give proper effect to the work programme.
- Information about the proposed permit holder's history of compliance with mining or similar permits and their conditions.
- The proposed date on which the substantive application is intended to be lodged (if your referral application is accepted) in accordance with section 42(11).
- If the authorised person proposes to provide information under section 37 (to the relevant chief executive), the date on which the person intends to provide that information.
- The proposed duration of the permit.

This is not relevant for this application.

3.8.5.3 Mining permits for petroleum

If the proposed approvals include a mining permit for petroleum, provide:

- A map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be the same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates.
- The resources and reserves relating to the project, estimated in accordance with the Petroleum Resources Management System.
- A high-level overview of the following:
 - the proposed field development plan;
 - the proposed date for the commencement of petroleum production;

- the economic model for the project;
- the proposed duration of the proposed mining permit and;
- decommissioning plans.

This is not relevant for this application.

3.8.5.4 Mining permits for minerals other than petroleum

If the proposed approvals include a mining permit for minerals other than petroleum, provide:

- A map of the area over which the mining permit application is intended to be made, the area in which the surrender of an exploration permit or existing privileges is proposed (which must be the same area as the area over which the mining permit application is intended to be made), and the extent of the resource and reserves to which the development plan relates.
- For minerals other than gold or silver, a report or statement confirming the ownership of the minerals targeted
- Information on whether the application will be for a Tier 1 or Tier 2 permit.
- An estimate of the mineral resources and reserves relating to the project, including a summary on acquisition of the data and the data underpinning the estimate (such as information on sample locations, grade, and geology). For a Tier 1 permit application the resources and reserves relating to the project are to be estimated in accordance with a recognised reporting code such as JORC or NI 43-101.
- An indicative mine plan.
- A high-level overview of the following:
 - the proposed mining method;
 - the proposed date for the commencement of mining and estimated annual production;
 - the economic model for the project;
 - the status of or anticipated timing for completing any pre-feasibility or feasibility studies;
 - the proposed methods for processing mined material and handling and treating waste and;
 - anticipated plans for mine closure and rehabilitation.

This is not relevant for this application.

Section 4: Authorisation

To the best of my knowledge, the information contained in this application is true and correct.

- ✓ I confirm that I am authorised to make this application.
- ✓ I have provided a copy of the application with all contact details redacted.
- ✓ I understand that all actual and reasonable costs incurred in relation to this application by MfE, EPA and other central and local government agencies will be recovered from me in accordance with section 104 of the Act, and the Fast-track Approvals Cost Recovery Regulations 2025.

Signature:

Date: 17 July 2025

A handwritten signature in blue ink, appearing to read 'Vanessa Hamm', is written over a light blue rectangular background.

Name: Vanessa Hamm

Referral application checklist

Use this checklist to confirm you have completed all sections of the referral application form.

Section 1: Applicant details	✓
1.2 & 1.3 Agent's evidence of authority to represent the applicant(s) - if applicable	✓
1.4 Compliance and enforcement history	✓
Section 2: Referral application summary	✓
2.1 Project name	✓
2.2 Project description and location	✓
2.3 Ineligible activity	✓
2.4 Exemptions from requirement to provide agreement	✓
2.5 Ministerial determinations under sections 23 and 24	✓
2.6 Appropriateness for fast-track approvals process	✓
Section 3: Project details	✓
3.1 Approvals required	✓
3.2 Project stages	✓
3.3 Alternative project	✓
3.4 Adverse effects	✓
3.5 Persons affected	✓
3.6 Legal interest	✓
3.7 Other matters	✓
3.8 Specific proposed approvals	✓
Section 4: Authorisation	✓
Section 5: Attachments	✓