

Invitation to provide written comments on a project under the Fast Track Approvals Act 2024

You have been invited to provide written comments to the Minister for Infrastructure (the Minister) on an application to refer a project under the Fast-track Approvals Act 2024 (the Act) to the fast-track process.

Please upload comments directly via the portal by completing this template.

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

Written comments must be received by MfE, on behalf of the Minister for Infrastructure, no later than the due date.

Important information

Your personal information will be held by MfE and be used in relation to the project application and process. You have the right to access and correct personal information held by MfE.

A copy of your comments, including all personal information, will be provided to the Minister and the applicant.

If you are a corporate entity making comments on this application, your full contact details will be publicly available.

For individuals, your name will be publicly available, but your contact details (phone number, address, and email) will not be publicly available.

A copy of your comments will also be published on the Fast-track website. If you believe any of the information you have provided is confidential or sensitive and should be withheld from publication, please highlight the information concerned and provide an explanation to support your request for withholding it. Your comment and explanation will be decided by the Ministry on whether to withhold the information from publication.

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More information on the fast-track approvals process and providing comments can be found at [Process overview](#) | [Fast-track website](#)

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Mangahao Hydro-Electric Power Scheme Reconsenting Project
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All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Manawatū-Whanganui Regional Council (Horizons Regional Council)		
*First name	Sara		
*Last name	Westcott		
Postal address	Private Bag 11025, Manawatu Mail Centre, Palmerston North 4442		
*Contact phone number	s 9(2)(a)	Alternative	s 9(2)(a)
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Thank you for the opportunity to provide comment on this referral application. The below is based on the previous comments, with some minor changes, being some additional comments and removal of some previous comments that do not directly relate to what can be commented on. <u>Section 17(3)(a) - Applications located that would be competing if a substantive application for the project was lodged:</u> The proposal is located within the following Water Management Sub-Areas: - Upper Gorge Water Management Area, Upper Mangahao Water Management Sub-Area (Mana_9d) - Coastal Manawatu Water Management Area, Upper Tokomaru Water Management Sub-Area (Mana_13b) - Coastal Manawatu Water Management Area, Mangaore Water Management Sub-Area (Mana_13d)

With respect to identifying any competing applications to the consents to be sought, we have checked the applications located in these Water Management Sub-Areas. The following applies:

- Taking, damming and diversion of water:
 - o Taking of water: Horizons One Plan provides an individual set of rules, policies to existing hydroelectricity schemes, including consideration of existing hydroelectricity schemes prior to setting minimum flow and allocation regimes for other uses (Objective LF-FW-O5 and Policies LF-FW-P17 and LF-FW-P18 of the Regional Policy Statement (RPS)). This means that the takes for hydroelectricity are not included in the water allocation framework set out in Schedule 3 of the One Plan and are not required to cease abstracting at the One Plan minimum flow but must adhere to any minimum flow restrictions in their resource consent conditions. As a result of this, there are no competing Water Permits for surface water abstraction for any activity in relation to the Mangahao HEPS.
 - o Damming and diversion of water: No competing applications.
- Discharge of water to water: No competing applications in these Water Management Sub-Zones.
- Discharge of contaminants to water: No competing applications in these Water Management Sub-Areas. We note that the One Plan utilises targets set out in Schedule 5 to manage water quality, which manages water management zones as a whole as well as site specific considerations.
- Erection, placement, use and maintenance of structures in the bed of a river: No competing applications in these Water Management Sub-Zones.
- Excavation and disturbance of the bed of waterbodies: It is unclear if the proposed excavation of the bed involves removal of gravel under Rule LF-AWBD-R72 of the One Plan, or whether this is general bed disturbance associated with maintaining storage capacity and flow from the dams (with no removal of gravel from the bed). If it relates to gravel extraction, then there is a competing application, being APP-2022203700.00. APP-2022203700.00 is an application made by Nga Manu Taiao, which seeks consent to extract 3,000m³/year of gravel from the Mangahao River. This application has been limited notified.
- Deposition of substances to the bed of waterbodies: - No competing applications in these Water Management Sub-Zones.

Section 17(3)(b) -Any existing resource consents of the kind referred to in s30(3)(a):

With respect to the consents to be sought we have reviewed the Water Management Sub-Areas as set out above. The following applies:

- Taking, damming and diversion of water: No consents subject to s124C(1)(c)
- Discharge of water to water: No consents subject to s124C(1)(c)
- Discharge of contaminants to water: No consents subject to s124C(1)(c)

- Erection, placement, use and maintenance of structures in the bed of a river: No consents subject to s124C(1)(c)
- Excavation and disturbance of the bed of waterbodies: No consents subject to s124C(1)(c)
- Deposition of substances in the bed of waterbodies: No consents subject to s124C(1)(c).

Section 5 – Involvement of an ineligible activity

I do not consider that the Project may involve an ineligible activity as defined in Section 5.

Section 21(5) – Reasons to decline application:

I do not consider that any of the reasons to decline a referral application, as set out in section 21(5) are applicable to this application except for section 21(5)(c).

The Project may have significant adverse effects on the environment if the potential effects on the Project are not managed effectively.

The following, in particular, have the potential to have significant adverse effects:

- the hydrology of the waterways impacts on freshwater habitat including flora and fauna and impacts on flood management and erosion from the continued damming, diversion and taking of water,
- impacts on water quality and instream ecology from the discharge of sediment associated with these activities; and
- Impacts on cultural values and the mauri of the waterways.

It is acknowledged that the applicant is currently working through preparation of their assessment of effects, and it is understood that the AEE will assess the scale of the above effects. The Applicant has been engaging with Horizons with respect to these.

Significant regional or national benefits:

The scheme is considered to be regionally and nationally significant infrastructure and therefore provides important benefits to both the region and nationally. The scheme also contributes to renewable energy generation for New Zealand.

The scheme will also contribute to renewable energy generation for New Zealand. Like any development, there will be an element of economic benefit with the project including the continuation of existing jobs with the continued operation of the HEPS.

Appropriateness of utilising Fast Track:

Horizons view on this matter is neutral. Horizons accepts that the project status as both renewable energy and regionally and nationally significant infrastructure is of importance, but due

consideration is needed to ensure that the environmental effects of the Project are appropriately managed.

Delivery of new regional or nationally significant infrastructure:

The Project is considered to be of regional or national significance under One Plan (2026) Policy EIT-P1.

Climate Change:

This project is for the continued operation of renewable energy, which has benefits in terms of contributing to a low carbon future by increasing New Zealand's renewable electricity generation capacity, contributing directly to national climate change mitigation and electrification targets.

Consistency with Regional Planning Documents

Based on the information provided and the discussions had to date, there does not appear to be any activities associated with the proposal that would be Prohibited by the Regional Planning documents.

There is nothing that stands out in the application that would make the Project unable to be consistent with the One Plan (2026), the National Environmental Standards for Freshwater (2020) (NES-F) or the National Policy Statement for Freshwater Management (2020) (NPS-FM), on the basis that a full Assessment of Environmental Effects is completed confirming that the potential effects from the Project will be managed effectively, and in accordance with the effects management hierarchy set out in the NPS-FM for any NES-F consents.

The potential adverse effects of the Project will need to be avoided, remedied, mitigated an/or offset in a manner that is consistent with the Objectives and Policies of the regional planning documents. This will need to be demonstrated in the substantive application with the current technical reports, and the addition of further reports.

Iwi and iwi authorities:

The Applicant has discussed the relevant iwi within the boundaries of the project. From reviewing Council's information, it does not appear that any other iwi or iwi authorities are relevant to this application.

Environmental compliance history:

A summary of the Applicants overall compliance ratings (as per previous Compliance Reports) for this project is as follows:

2024-2025 – low risk non-compliance (non-compliance with consent conditions that are low risk

2022-2024 – low risk non-compliance

2021-2022 – medium risk non-compliance (non-compliance with consent conditions that are of a medium risk)

2020-2021 – medium risk non-compliance

2018-2020 – medium risk non-compliance

No formal enforcement action has been taken against the Applicant for this proposal.

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

Managers signoff

A handwritten signature in black ink, appearing to read 'G Bevin', is positioned above the printed name.

Greg Bevin

Regulatory Manager

Horizons Regional Council

24 August 2026

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Project name	Mangahao Hydro-Electric Power Scheme Reconsenting Project
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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Horowheuna District Council		
*First name	Brent		
*Last name	Harvey		
Postal address	Private Bag 4002, Levin 5540		
*Contact phone number	s 9(2)(a)	Alternative	s 9(2)(a)
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Thank you for inviting Horowhenua District Council (HDC) to provide comment with respect to Country Energy Limited's application for the Mangahao Hydro-Electric Power Scheme to be referred to the Fast Track Approvals Act process. HDC is not opposed to the project being considered under the Fast Track Approvals Act. HDC's comments are provided below in respect of three separate statutory and local government functions undertaken by HDC. Comment as Resource Management Act consent authority HDC, in its regulatory function under the Resource Management Act 1991 (RMA), confirms: 1. It has not received any applications which would be considered competing applications if a substantive application for the project were to be lodged. 2. There are no existing resource consents issued by HDC where sections 124C(1)(c) or 165ZI of the RMA could apply.

Insert Fast-track logo

The Fast Track referral process requires a general level of detail to be provided about each approval proposed to be sought through the Fast Track process. The applicant has identified the approvals it considers are required and has stated that a resource consent is not required from HDC.

HDC is unable to confirm or support that position on the information currently available. To date, HDC has not been provided with plans or sufficient detail about the nature, location and extent of some of the proposed works to enable it, in its capacity as territorial consent authority, to determine whether resource consent from HDC is required.

Similarly, HDC does not currently have sufficient information to determine whether any of the proposed activities could lawfully rely on existing use rights under the RMA.

HDC therefore considers that no conclusion should presently be drawn that HDC resource consent is not required. This will need to be determined once sufficient information about the proposed activities and works has been provided.

For completeness, HDC advises that the following approvals have previously been granted in respect of activities associated with the overall scheme:

- **LUC/501/2019/125** – Resource consent for soil disturbance affecting a piece of land within a HAIL site at Mangahao Substation.
- **504/2019/30** – Alteration to Designation.

Comments as Water Supplier under the Water Services Act 2021

HDC is the water supplier for the Shannon water supply, which is of critical importance in supporting the health and wellbeing of the Shannon community. The supply sources water from the Mangaore Stream a short distance upstream of the Mangahao Power Station discharge.

HDC is currently in a resource consent renewal process for the water take for this supply. The existing resource consent has expired, and the scheme is operating on the basis of section 124 RMA rights to continue to exercise the expired consent.

A key factor in the consenting process, which has resulted in significant delays and additional costs to HDC, has been the absence of hydrological monitoring of, or an agreed flow regime for, the stream. The technical assessments undertaken by HDC's advisors, as well as the Regional Council's advisors, agree that fluctuations in flow due to the power station are likely to dominate effects on the hydrology downstream of the power station.

HDC therefore has a direct interest in the discharge regime from the Power Station, as it is the dominant factor in the Stream's hydrological regime and a key factor influencing the effects associated with Council's water supply abstraction.

In addition to the water take, HDC is also seeking to renew consents for discharges from the Shannon Water Treatment Plant associated with reservoir cleaning and overflow. These

discharges are to a roadside drain which connects to the Mangaore Stream downstream of the power station discharge.

Regional Council has indicated that it will likely impose conditions of consent requiring HDC to undertake discharges from its Water Treatment Plant only when the power station is discharging, as far as practicable. This provides a further reason for HDC's interest in the power station's discharge regime.

HDC acknowledges the work the applicant is undertaking to determine the hydrological regime of the Stream, including its engagement of Tonkin + Taylor Ltd to undertake this assessment. Regional Council has advised HDC that it does not, and is not intending to, undertake hydrological monitoring or investigations on the Stream and that this is required to be determined by consent applicants.

HDC is keen to share its hydrological assessments with the applicant and ensure there is a common understanding of the hydrology across all permits determined for the Stream, so that all discharge and water permits can be assessed on a consistent basis.

Comment as Local Government Provider of Community Services

The Mangahao Hydro-Electric Scheme operates within a community that experiences higher levels of socio-economic challenge, with an average adult income of \$30,000 compared with the national average of \$41,500 (2023 Census). While the scheme makes a significant contribution to New Zealand's renewable energy network and has considerable value over the lifetime of the consent, the local community has not always had the opportunity to share fully in these benefits.

As a provider of community services and open spaces, HDC is mindful of the importance of ensuring that the scheme's ongoing operation also creates positive and enduring outcomes for Shannon and the wider Horowhenua community.

A key example is the Mangahao WhiteWater Park, a community-led initiative located immediately below the Mangahao Power Station. The park represents significant community investment and has developed into an important facility for whitewater recreation, training and events, complemented by picnic areas, native planting and connections to mountain biking and tramping tracks.

The park currently operates under arrangements that provide for a limited number of water release days each year. Given the existing investment in the facility, its established role in whitewater sport, training and events, and the wider wellbeing, recreational, tourism and economic opportunities it provides, HDC considers that the Fast Track and subsequent consenting process presents an important opportunity to secure and enhance the long-term recreational use of the river.

In particular, HDC would support consideration of greater certainty, flexibility and frequency of water releases to enable training, events and community use, while recognising the operational requirements of the hydro-electric scheme.

Insert Fast-track logo

HDC also considers that the future operation of the scheme should recognise the existing role and investment of the Energy, Water and Whitewater Park Trust (EWWPT), the interests of Whitewater New Zealand (WWNZ), and the wider paddling and recreational community. There is an opportunity to establish enduring arrangements around water releases, access, management and investment that provide greater certainty for the WhiteWater Park and support its continued development as a regional and national recreational asset.

More broadly, HDC sees potential for the reconsenting of the scheme to provide a long-term legacy for Shannon and the wider Horowhenua community. This could include investment in the Mangahao reserve and recreational infrastructure, improved walking and cycling connections, facilities that support events and community use, environmental and cultural initiatives, and opportunities to further develop the area as a recreation and tourism destination.

HDC would welcome further engagement with the applicant, EWWPT, WWNZ, iwi and other relevant stakeholders on how these opportunities can be advanced through the substantive application and the long-term operation of the scheme, in a way that appropriately balances national renewable energy objectives with local community aspirations and benefits.

There may also be opportunities for investment in community infrastructure, education and recreation, including initiatives such as community facilities, cycleways and pedestrian connections, which could strengthen community resilience, wellbeing and local identity.

HDC would welcome further discussion with the applicant about how these opportunities could be advanced in a way that appropriately balances the scheme's contribution to national renewable energy objectives with the aspirations and wellbeing of the local community.

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

Managers signoff



Brent Harvey

24 August 2026

Hon Shane Jones

Minister for Oceans and Fisheries
Minister for Regional Development
Minister for Resources
Associate Minister of Finance
Associate Minister for Energy



5 August 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act 2024 – Mangahao Hydro-Electric Power Scheme application (FTAA-2607-1258)

Dear Chris,

Thank you for the opportunity to comment on this referral application under the Fast-track Approvals Act 2024 (FTAA 2024).

The FTAA 2024 has been established to provide a regime that makes it easier and quicker for regionally and nationally significant infrastructure projects to gain the approvals needed for development, in support of this Government's economic growth objectives.

I have considered the application and its alignment with the priorities of my Regional Development portfolio. My comments are attached as Annex One.

Yours sincerely,

A handwritten signature in blue ink, appearing to be 'S. Jones'.

Hon Shane Jones
Minister for Regional Development

Annex One – Regional Development comments

Project overview

1. Manawa Energy Limited (a wholly owned subsidiary of Contact Energy) has applied for Fast-track Approval to replace resource consents for the Mangahao Hydro-Electric Power Scheme (the Scheme). No changes to the currently-authorised operating regime are sought. Manawa Energy Limited has fully acquired the Scheme from King Country Energy Limited, who had previously submitted a Fast-track Approval application for the same purpose.
2. The Scheme generates an average annual output of 131 gigawatt-hours, enough to power approximately 20,000 homes, supplying energy directly into the Manawatū region and excess into the national grid. The Scheme also materially contributes to greenhouse gas emission reductions of between 67,830 tonnes carbon dioxide-equivalent (for gas generation) or 172,208 tonnes carbon dioxide-equivalent (for coal generation).
3. The application notes that the primary benefits are the avoidance of costs were the Scheme to cease operation, such as the cost of constructing new wind and thermal generation assets to replace the scheme's generation, estimated to cost around \$190.6 million.

Comments

4. The consent sought is not for a new development or infrastructure project, therefore there is not expected to be additional direct economic benefit from this consent being approved.
5. The application appears to primarily have implications for New Zealand's energy system, and commentary from the Energy portfolio will be more relevant in assessing the strategic importance of the project.

Minister of Climate Change
Minister for Energy
Minister of Local Government
Minister of Revenue

12 AUG 2026



Hon Chris Bishop
Minister for Infrastructure
c.bishop@parliament.govt.nz

Dear Chris,

Thank you for the invitation to comment on Manawa Energy Limited's Fast-track Approvals Act 2024 (FTAA) substantive application, Mangahao Hydro-Electric Power Scheme (FTAA-2607-1258).

The continued operation of the Mangahao Hydro-Electric Power Scheme promotes the benefits of renewable electricity generation, including reducing greenhouse gas emissions.

I wish to take this opportunity to express my broad support for projects which deliver positive climate outcomes for New Zealand, including the Mangahao Hydro-Electric Power Scheme.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Simon Watts', written over a horizontal line.

Hon Simon Watts
Minister of Climate Change



24 AUG 2026

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

REQ-0037965

Dear Chris

Thank you for the opportunity to comment under the Fast-track Approvals Act 2024 on the referral applications for Mangahao Hydro-Electric Power Scheme Reconsenting Project (FTAA-2607-1258), ^{Out of Scope}

Out of Scope

Out of Scope

I am providing these comments in my capacity as Minister for Economic Growth. They focus on whether each application is likely to deliver significant economic benefits under section 22(2)(a)(iv) of the Act, based on the information provided by the applicants. The quantitative estimates below are drawn from economic assessments supplied by the applicants.

Mangahao Hydro-Electric Power Scheme Reconsenting Project, FTAA-2607-1258

The application seeks renewed consents to continue operating and maintaining the existing Mangahao Hydro-Electric Power Scheme in the Horowhenua District. No new infrastructure, upgrades, or changes to the Scheme's operating regime are proposed.

As the proposal relates to the reconsenting of an existing hydro-electric scheme rather than the construction of new infrastructure, the application does not estimate construction expenditure, construction-related GDP, FTE employment, or wages. Instead, the identified economic benefits relate primarily to maintaining existing electricity generation capacity and avoiding the costs of replacing the Scheme's generation and firming functions.

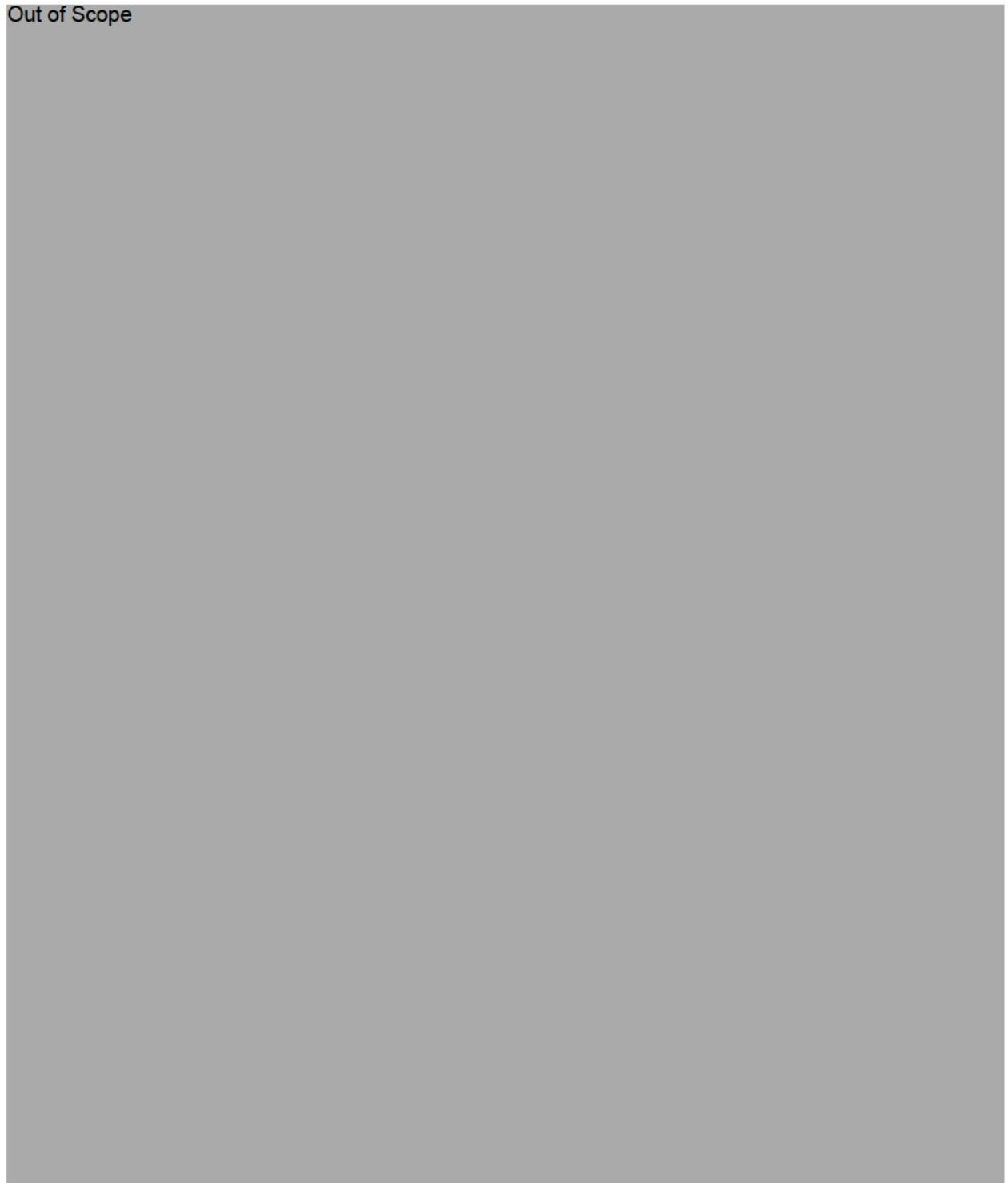
According to the applicant's economic assessment, replacing Mangahao's annual generation would require approximately 38.6 MW of wind generation, with estimated capital costs of \$128.7 million and annual operating costs of approximately \$2.0 million to \$2.7 million. Because wind generation would not replicate the Scheme's controllable profile, the assessment also estimates that additional thermal firming capacity would be needed at a capital cost of \$60.7 million. Maintaining the Scheme is therefore estimated to avoid approximately \$190.6 million in replacement generation capital costs, plus approximately \$5.8 million a year in fuel costs for supplementary thermal generation.

Continued operation also offers wider regional benefits. The Scheme's annual output of approximately 131 GWh is equivalent to the electricity use of about 20,000 homes and is estimated to meet approximately 63 to 64 per cent of the electricity load supplied through the

Mangahao grid exit point during morning and evening peaks. The assessment identifies the Scheme's controllable generation as providing firming when intermittent wind generation is insufficient, avoiding additional transmission losses if replacement electricity were generated outside the region, and avoiding around 25,800 tonnes of carbon dioxide-equivalent emissions each year from supplementary thermal generation.

On balance, the proposal appears likely to deliver significant regional economic benefits under section 22(2)(a)(iv) of the Act, principally by maintaining existing renewable and controllable electricity generation, supporting regional security of supply, and avoiding the estimated capital and operating costs of replacing the Scheme's generation and firming functions.

Out of Scope



Out of Scope

Out of Scope

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Nicola Willis', with a stylized flourish at the end.

Hon Nicola Willis
Minister for Economic Growth



Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Dear Chris

Fast-track Approvals Act referral application: Mangahao Hydro-Electric Power Scheme Reconsenting Project, FTAA-2607-1258

Thank you for the opportunity to comment on this application for referral under the Fast-track Approvals Act (the Act).

Demand for electricity is expected to increase by 70–170% of current levels by 2050. Electricity supply – generation, transmission, and distribution – needs to meet this rising demand. Without this increase, we risk an unreliable and costly electricity supply and our ability to electrify our economy away from fossil fuels.

Mangahao is a medium-sized hydro scheme by New Zealand standards, generating up to 39.9 megawatts of electricity, with an average annual output of 131 gigawatt-hours, sufficient to power approximately 20,000 homes. Hydro generation with storage also complements more intermittent generation sources such as solar and holds additional value for the Manawatū-Whanganui region, which has little other hydro generation. Mangahao is one of the most significant hydro schemes in the lower North Island.

I therefore consider that this project will enable the continued functioning of existing regionally significant infrastructure, as per s22(2)(a)(ii) of the Act.

I note that other ministers and agencies are better placed to advise on other grounds for referral.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'S. Brown'.

Hon Simeon Brown
Minister for Energy



By email: infrastructure.portfolio@parliament.govt.nz

Tēnā koe Minister Bishop,

Invitation to comment on Mangahao Hydro-Electric Power Scheme Reconsenting project under the Fast-track Approvals Act 2024

Thank you for the invitation to comment on Mangahao Hydro-Electric Power Scheme Reconsenting project under section 17 of the Fast-track Approvals Act 2024.

I have considered the application and its alignment with my portfolios as Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development.

I support the application progressing and I encourage the applicant and the panel to have due regard to:

- relevant Treaty settlement legislation and instruments; and
- any feedback received from relevant Māori groups, as set out in the Treaty settlements and other obligations (Section 18) report.

Nāku noa, nā

A handwritten signature in black ink, reading 'Tama Whihau Potaka'.

Hon Tama Potaka

Te Minita mō Te Arawhiti me Te Minita Whanaketanga Māori
Minister for Māori Crown Relations: Te Arawhiti and Minister for Māori Development

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1. Contact Details

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Organisation name (if relevant)	Department of Conservation		
*First name	Ellanor		
*Last name	Babbage		
Postal address			
*Contact phone number	03 244 3272	Alternative	
*Email	Fast-track@doc.govt.nz s 9(2)(a) [REDACTED]		

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If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

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

Manager's signoff



Linda Kirk

Date: 20 August 2026

Director-General of Conservation s17 comments

Project name	Mangahao Hydro-Electric Power Scheme Reconsenting
Applicant name	Manawa Energy Limited
Application number	FTAA-2607-1258
Project summary details	The project is the reconsenting of the existing Mangahao Hydro-Electric Power Scheme to enable its continued operation and maintenance. The Scheme is located in the northern part of the Tararua Ranges, approximately 28 kilometres south-west of Palmerston North and 15 kilometres north-east of Levin. It draws water from the Mangahao River and generates up to 39.9 megawatts of electricity, with an average annual output of 131 gigawatt-hours, sufficient to power approximately 20,000 homes. The project includes existing maintenance activities occurring on multiple Crown land parcels administered by the Department of Conservation. The activities applied for include: • the damming, taking, diversion and use of water; • the discharge of water and sediment; • the disturbance of riverbeds; • the deposition of sediment; • the maintenance of structures within waterbodies; and • the erection and placement of structures within waterbodies (included on a precautionary basis). The project will require the proposed approvals: • resource consents under the Resource Management Act 1991 • the applicant identifies that an approval under the Freshwater Fisheries Regulations 1983 will be required and states that further ecological investigations will determine whether a standard or complex freshwater fisheries approval is necessary. The applicant also explains that no changes to the existing operating regime are proposed.

1 Overview of comments

1.1 Applicant Engagement

- 1.1.1 As the project includes an approval under a specified Act for which the Director-General of Conservation is the administering agency, the applicant was required to notify DOC and allow 20 working days to respond before lodging the referral application in accordance with section 11.
- 1.1.2 DOC was notified of the applicants' intention to re-lodge this referral application on 28 April 2026; the referral application was lodged the week of 20 June 2026.

1.1.3 In the period available specific feedback was provided as discussed below.

1.2 Approvals sought

1.2.1 The following approvals for which DOC is the administering agency have been sought in the referral application:

1.3 Potential Complex Freshwater Fisheries Approval

1.3.1 The referral application states that the Project will require a Freshwater Fisheries approval, with the confirmation of fish spawning to clarify if the approval is simple or complex. DOC is satisfied that the additional information will clarify the matter, and that a complex freshwater fisheries approval could be required.

1.4 Other considerations

1.4.1 DOC agrees that the easement granted under the State-Owned Enterprises (Mangahao Power Station Limited Vesting Order No. 1) Order 1997 ensures that the applicant does not need to seek additional concessions to enable the activity on DOC managed public conservation land.

1.5 Conclusion

1.5.1 In conclusion, DOC is not aware of any reason the Project should not be referred.

2 Criteria for Minister's decision on referral application

2.1.1 Sections 21 and 22 of the FTAA set out matters to be considered by the Minister in determining whether a referral application should be accepted.

2.1.2 Comments below are targeted to provisions where DOC has specific interests or information relevant to the Minister's decision.

2.2 Criteria for declining a referral application

2.2.1 Section 21 sets out the criteria for the Minister for declining a referral application. DOC has considered these criteria and provides comments in the table below.

Section	Criteria	Comments
21(3)(b)	Does the project involve an ineligible activity?	Based on the information available, DOC has considered the ineligibility criteria at sections 5(1)(h), (i), (j) and (k), and has not identified any aspect of the Project that would be ineligible based on those criteria.
21(3)(c)	Is there adequate information to inform a decision?	With respect to the approvals identified in the referral application for which DOC is the administering agency, DOC considers the information adequate in terms of a referral decision.
21(4)	Are there any other reasons to decline the application?	Based on the information available, DOC has not identified any reason why the Project should be declined.

Section	Criteria	Comments
21(5)(a)	Is the project inconsistent with: • a Treaty settlement; • Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019; • Marine and Coastal Area (Takutai Moana) Act 2011.	Based on the information available, DOC has not identified any inconsistency with any relevant Treaty settlement or other obligations.
21(5)(b)	Would it be more appropriate to deal with the proposed approvals under another Act(s)?	Based on the information available, DOC has not identified any reason why the Project should not be dealt with under the FTAA.
21(5)(c)	Would the project have significant adverse effects on the environment?	Based on the information available, DOC considers it is likely that adverse effects of the Project can be addressed through appropriate conditions on any substantive approvals.
21(5)(d)	Does the applicant(s) have a poor compliance history under a specified Act?	DOC has not identified any issues with the applicant's compliance history.
21(5)(g)	Would a substantive application have any competing applications?	Based on the information available, DOC has not identified any competing applications in respect of conservation approvals.

2.3 Criteria for accepting a referral application

2.3.1 Section 22 sets out the criteria for the Minister for accepting a referral application.

2.3.2 DOC has considered these criteria and has provided comments in the table below.

Section	Criteria	Comments
22(1)(b)(i)	Would referring the project to the fast-track process facilitate the project, including in a way that is more timely and cost-effective than under normal processes?	DOC agrees that there are benefits for the applicant in combining the potential consideration of a complex freshwater fisheries approval with RMA approval under the different decision-making framework of the FTAA that would enable a timelier and more cost-effective process overall.
22 1A	Is there a relevant Government Policy Statement?	There are no relevant Government Policy Statements for this application.
22(2)(a)(ix)	Will this project address significant environmental issues?	Maintaining renewable energy generation within New Zealand will help combat greenhouse gas emissions.

22(2)(a)(x)	Is the project consistent with local or regional planning document, including spatial strategies?	The Wellington Conservation Management Strategy 2019 is not relevant to the FTAA consideration of a Complex Freshwater Fisheries approval. DOC also notes that the existing structures and vested easement are not inconsistent with the Wellington Conservation Management Strategy 2019.
22(2)(b)	Any other matters the Minister may consider as relevant?	DOC has not identified any other matters the Minister may consider relevant.

3 Other considerations

- 3.1.1 In the previous s17 comments for this project (dated 11 September 2025) DOC noted that additional concessions would be needed for the applicant to undertake the activity on DOC managed public conservation land (Taranaki Forest Park & Tokomaru Valley Road Conservation Area).
- 3.1.2 Since then, DOC has identified the State-Owned Enterprises (Mangahao Power Station Limited Vesting Order No. 1) Order 1997 which gazetted the Deed of Grant of Easement pursuant to Section 23(1) of the State-Owned Enterprises Act 1986. DOC considers that the wording of the Deed of Grant of Easement around *the grantee* (specifically referring to 'successors' of Mangahao Power Station Limited within the description) enables Contact Energy Limited to operate under the easement.
- 3.1.3 As such, DOC considers both; that the easement covers the applied for activity without need for additional concessions or variations to the existing easement, and that the applicant can operate under the easement.



Linda Kirk
Fast Track Applications Manager

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

Date: 20 August 2026

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

20 August 2026

Oliver Sangster
Application Lead
Fast-track
Ministry for the Environment

Dear Oliver,

Re: Renewal of Resource Consents for the Mangahao Hydro-Electric Power Scheme

Established in 1922, Electra owns and operates the electricity network supplying the Kāpiti and Horowhenua districts on the west coast of the lower North Island, covering the area between Paekākāriki in the south to Foxton and Tokomaru in the north.

Electra serves approximately 47,000 connections, approximately half of which are in our northern network which is supplied from the Mangahao point of connection to the national grid, the same point where the Mangahao Hydro Station injects to.

Electra Limited supports the renewal of the resource consents for the Mangahao Hydro Electric Power Scheme for the following reasons:

- The Mangahao Hydro-Electric scheme plays a crucial role in the periods of peak winter demand for the Electra northern network. Generation from the scheme ensures that Transpower's supply transformers from the national grid do not overload should one of them become unavailable (that is, the generation ensures that these assets can operate safely at an n-1 contingency level);
- The transmission connection from the national grid to Mangahao is via two 110kV transmission lines from Bunnythorpe, which share single pole/tower structures for some of the route. In the unlikely event of the loss of both transmission lines to Mangahao (e.g. storm damage to poles/towers containing both lines), then Mangahao Hydro-Electric generation provides the ability to largely supply the Horowhenua area until those lines are returned to service;
- The Mangahao Hydro-Electric scheme provides firm synchronous generation with hydro storage that is able to assist the system operator to firm generation and manage transmission flows through the region. Significant new solar is being constructed in the Foxton area and this, combined with the significant wind generation in the Manawatu, benefits from having local firming generation to help stabilise the system, thus enabling the transition to a low-carbon electricity system;

- Mangahao Hydro Electric scheme also provides voltage support to the local area, which also becomes more critical as solar and wind investment continues;

In summary, Mangahao improves the reliability, resilience and security of supply to Electra's northern network which supplies approximately 24,000 customers across the Horowhenua district. Given these significant system and community benefits, Electra considers the continued operation of the Mangahao Hydro Electric Power Scheme to be in the public interest. Renewal of the existing consents will enable the station to continue providing essential generation, network support, and resilience services that contribute to the reliability and sustainability of New Zealand's electricity system.

Yours sincerely,



Chris Ewers

General Manager Network

Electra Limited

Your written comments on a project under the Fast Track Approvals Act 2024

24 August 2026

Project name	Mangahao Hydro-Electric Power Scheme Reconsenting Project (Project) FTAA-2507-086/BRF-7003 (REQ003919V8Z3)
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Transpower New Zealand Limited (Transpower)		
*First name	Andy		
*Last name	Eccleshall		
Postal address	PO Box 21-154, Edgware, Christchurch 8143		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Thank you for the opportunity to provide comment on the application for the Mangahao Hydro-Electric Power Scheme Reconsenting project (Project) and its potential impact on National Grid assets. Transpower has been asked to provide comment pursuant to the Fast-track Approvals Act 2024. The project generates electricity that is conveyed by the National Grid and is therefore an activity that Transpower supports. Transpower do not have any specific comments regarding the reconsenting of the activity but supports the granting of the consents. Transpower would appreciate receiving copies of communication issued on the progress of the application.

Muaūpoko Tribal Authority Inc.

306 Oxford Street Levin 5510 – PO Box 1080 Levin 5540

Tel: (06) 367-3311 Fax: (06) 367-3322 Email: admin@muaupoko.iwi.nz



17 August 2026

Tēnā koutou

Regarding: Muaūpoko Tribal Authority Comments on the Referral Application under the Fast Track Approvals Act 2024.

Statement of position

Muaūpoko Tribal Authority (MTA) **do not support** the application by King Country Energy (Contact Energy) to refer the Mangahao Hydropower Scheme for consideration under the Fast Track Approvals Act 2024.

MTA's position is that the application should be declined at the referral stage for the following reasons:

- The scheme is the oldest major hydroelectric scheme in NZ, opened in 1924, meaning that it was developed when understanding of the profound impacts of hydroelectric schemes on freshwater ecosystems was in its infancy (and impacts on iwi values not considered at all). Renewal/s have done very little to change this.
- The Applicant has entered into the Fast-Track process to avoid "flow restrictions" and "complex conditions" typically imposed under the RMA. This frames standard environmental protections as potential causes of "significant loss of energy production".¹ Approving the referral on the basis that it would enable environmental conditions would be to pre-determine those issues.
- The Applicant seeks 35-year consents to maintain the current operational regime without committing to sufficient effects management measures in the Mangahao, Tokomaru and Mangaore Rivers.

Our status as a likely affected party under the FTAA

We consider ourselves affected by the project.

¹ Section 2.6 of Attachment 7 of the Referral application (the appropriateness for Fast Track Appr

We are a relevant iwi authority under section 13(4)(j) of the Fast Track Approvals Act 2024.

Our association with the project area

MTA has the following associations, interests, values and taonga within the project area:

Our association with the environment

- Muaūpoko holds ancestral rights (tangata whenua) across Te Ūpoko o te Ika, spanning from the Rangitikei River to Turakirae (Cape Palliser), with Horowhenua as the ancestral heartland. MTA is the mandated iwi authority for RMA purposes, Treaty settlement negotiations, the Māori Fisheries Act 2004, and the Māori Commercial Aquaculture Claims Settlement Act 2004.
- Muaūpoko land owners hold statutory fishery rights preserved under Section 18 of the Reserves and Other Lands Disposal Act 1956 (ROLDA) for Punahau and Hōkioi. Access to upper Tararua fisheries (such as Ūpokororo) was explicitly recognised under the Horowhenua Block Act 1896 (Tararua Block / Block 12), which is within and adjacent to the project area.
- Muaūpoko mātauranga recognises the naming and traditional use of the Tararua Range, the project awa (Mangahao, Tokomaru, Mangaore, Arapeti), and groundwaters.

Wāhi tapu, wāhi tupuna, and taonga environments

- The Tararua Ranges are a sacred mountain range (ko Tararua ngā pae maunga) containing ancient tracks, mahinga kai, and sanctuaries our tīpuna used.
- The Mangahao River, Tokomaru River, Mangaore Stream, and Arapeti Stream are ancestral waterways whose natural flows, sediment processes, and ecology have been fundamentally altered by the scheme.
- Tāwhirikohokohu (spring) is a sacred waterbody that has immense cultural, spiritual and ancient wairua associations.
- Maunga Puke Toa (peak), Maunga Harakeke (peak), Te Paki (peak) and Ngapuketurua (peak) are significant mountains within the ranges within and adjacent to the scheme. They are linked to our tracks and mahinga kai. They are named for our ancestors and their traditional uses.

Taonga species

Taonga species present in the scheme's catchments include long-finned eel (tuna), short fin eel (tuna), short-jaw kōkopu, giant kōkopu, banded kōkopu, kōaro, torrent fish, dwarf galaxiid, bullies, and lamprey. Historically, the waters supported Ūpokororo (grayling).

Existing dam structures eliminate fish passage to upper reaches, while artificial flow fluctuations, inter-catchment water transfers, and sediment sluicing degrade downstream habitats and cause fish injury and mortality.

Core Muaūpoko values relevant to the project

- **Manaakitia te mauri o te taiao** recognises that water is life-sustaining. Taking all water, leaving no residual flow in parts of the Mangahao and Tokomaru Awa, and transferring water across catchments severs the natural flow of water and its mauri. It breaches our tikanga and actions are required to restore and give back to these waterbodies and our taonga species.
- **Kaitiakitanga** describes our obligation to protect the physical, ecological, and spiritual health of our ancestral maunga and water. Exercising kaitiakitanga requires real-time data access, cultural health monitoring, and active involvement in resource management and operational decisions.
- **Mana whakahaere and tino rangatiratanga** encompass our inherent right to be involved in governance, management, and implementation of resource management related to our ancestral taonga.
- **Te Kete Aranui** describes the need to rebuild iwi access and transfer mātauranga about the scheme environment to rangatahi and whānau over long consent durations.

Māori Land, marae and identified wāhi tapu within the project area

Section 13(4)(o) states a referral application must include information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area.

There are no parcels of Māori land, and no Muaūpoko marae in the scheme area.

The project area includes the following identified wāhi tapu (discussed above).

- Arapeti (awa)
- Tokomaru Awa (awa)
- Tarawhitikohokohu (lake)
- Maunga Puke Toa (peak)
- Maunga Harakeke (peak)
- Te Paki (peak)
- Ngapuketurua (peak)

The Applicant has not asked us for this information to include in their application. This information is contained in our private iwi database and will be included in our Cultural Impact Assessment.



Figure 1 Map showing Muaūpoko wāhi tapu relative to the project area

Consultation or notification by the Applicant

The applicant (King Country Energy) has notified MTA in writing about their intent to make a referral application for the scheme.

The nature of engagement to date has also included:

We were procured to undertake a CIA in July 2025. However, we have not been able to progress this mahi because we lack information to understand how the scheme operates. We had a short series of hui around July 2025 to discuss the consenting programme and some fish data that had been collected.

We have undertaken a site visit in late 2025.

We have had some communication over the phone in the interim period.

We recently held a workshop on 14th August 2026, where the project team presented information on effects on ecology and sediment.

Our role if the referral application is accepted

MTA have the status of a relevant iwi authority and intends to respond to the invitation to comment under s 53 of the Act, if the application is accepted for processing as a substantive application.

The referral application should be declined under section 21(3) or (4)

We consider that the Minister should decline the referral application for the following reason(s):

- the project may have significant adverse effects on the environment;

Our justification for this is as follows:

The project will have significant adverse effects on the environment

Based on the information provided in the referral application and our understanding of the scheme today, MTA consider that the Mangahao Hydro-Electric Power Scheme will have significant actual or potential adverse effects. Under RMA case law, significant adverse effects are those that carry a serious, noticeable environmental impact; the scheme's current unmitigated baseline operation inflicts continuous, high-level adverse impacts on the awa, ecosystems, and Muaūpoko cultural well-being.

Cultural and spiritual effects

- Taking water from the Mangahao and Tokomaru catchments and transferring it across catchment boundaries into Mangaore Stream severs ki uta ki tai pathways, disrupts mauri and breaches our tikanga. Mana whenua involvement and regenerative actions are the only way to manage these effects, this is not currently included in proposals.
- Decisions on water allocation, flow regimes, and river management may continue to be made exclusively by Western technical experts and regulators, without recognition of MTA decision-making authority, our tikanga and our mātauranga. This would suppress our tino rangatiratanga and mana whakahaere.
- Access to our key traditional areas and wāhi tapu is restricted.

Effects on ecology

- Effects on ecology are also cultural effects.
- The existing dams on the Mangahao HEPS obstruct the upstream and downstream passage of taonga species, including long-finned eel (tuna), short-jaw kōkopu, giant kōkopu, banded kōkopu, kōaro, and torrent fish.
- The scheme extracts all available water in sections of the mid Mangahao and upper Tokomaru Rivers, leaving no residual flow. Correspondence with the applicant (July 2026) confirms that:
 - o Downstream of No.2 Dam (Mangahao River), there is currently no residual flow, as required by consent. Flow relies on spill gate mechanisms and leakage.
 - o Below No.3 Dam (Tokomaru River), the channel is dry for ~300 m before the tributaries provides small regenerating flow. The highly polluted downstream environment receives significantly less water, resulting in contaminant concentration buildups.

This large-scale take has degraded and destroyed instream aquatic habitats.

- Temporary coffer dams and instream desilting disturbance in No. 1 Reservoir (on Crown/DOC land) regularly disrupt benthic habitats and water quality. Correspondence with the applicant (July 2026) confirms:
 - o Sediment management operations cause "sharp oxygen drops, and deposition of large quantities of sediment" downstream.
 - o Water clarity downstream of dams consistently fails to meet Horizons One Plan targets.
 - o Stream macroinvertebrate communities are severely depleted downstream of the Mangahao dams.
- The scheme creates large flow fluctuations in downstream habitats. Significant and rapid flow variations and tailrace discharges into the Mangaore Stream disrupt habitat stability and health.

Natural and physical resources of special value

- Water quality and riparian margins of rivers within the Taranaki Ranges are extremely high quality and pristine, compared to the wide-scale degradation of the Manawatū catchment.

Discharge of contaminants (sediment)

- Dam infrastructure traps sediment, depriving downstream reaches of beneficial sediment transport. Periodic sluicing releases heavy sediment loads, causing widespread silt buildup, deoxygenates water, and makes downstream habitats uninhabitable for ika and other aquatic species.
- Altered flow regimes cause bank instability and gravel erosion downstream of the power station tailrace in the Mangaore Stream.

Landscape effects

- Hydropower infrastructure (dams, penstocks, surge chambers) has altered the natural character of the Taranaki Ranges, including our sites of significance (our

awa, our experiences from our significant mountain peaks, our traditional pathways and access to these places). They have significantly altered the natural landscape compared with what our tīpuna knew and what is contained within our mātauranga passed down over generations.

The Applicant's description of effects

The Applicant's assessment of effects in the referral application has gaps that we believe undermine its completeness, namely:

- An inaccurate existing environment approach
- Incorrect framing of environmental mitigations as a burden
- The minimisation of cultural impacts
- Unaddressed data gaps

The Applicant states that because no operational changes are proposed, "no material change in environmental effects is expected" (Attachments 7 and 8 of the referral application). This argument treats 100+ years of unmitigated environmental degradation (zero residual flows, total fish migration blockages) as an acceptable baseline, which is inappropriate to MTA. Expecting "no material change" simply means locking in continuous, significant adverse impacts on the awa and our taonga species.

In Attachment 7, the Applicant criticises standard RMA processes for introducing flow restrictions that result in a "loss of energy production" and "more complex conditions". This frames essential river management as negative process costs rather than necessary ecological and cultural requirements. The effects of the Mangahao HEPS, while they have existed since the 1920s, have not been rigorously assessed against the mātauranga and scientific knowledge we hold today. The allowance of adverse effects under the historical consent does not necessarily mean they are appropriate or exempt from review.

The Applicant reduces cultural effects to high-level references regarding "fish passage and loss of mauri" (Attachment 7). They record their engagement with iwi and hapū to date, but do not acknowledge the lack of technical information we have had to inform our CIA. This limits our ability to assess how the project will affect tino rangatiratanga, mana whakahaere, kaitiakitanga, intergenerational knowledge transfer, and broader catchment health ki uta ki tai. It also means we cannot provide targeted recommendations. We have put forward our views, based on high-level information received to date, about effects and the need to undertake restoration and fish passage offsetting, involving mana whenua, alongside in-scheme mitigations, but have not had any success in progressing these effects management approaches.

The Applicant acknowledges that technical assessments for aquatic ecology/fish passage (Ryder Consulting) and sedimentation (Tonkin & Taylor) are incomplete or high-level summaries, while iwi CIAs are still in progress. We have not received any drafts of the technical assessments. We note that completing a CIA without technical assessments would not be appropriate. Seeking fast-track referral before these baseline studies and cultural assessments are understood is premature.

Does the project meet the criteria in section 22 for consideration under the Fast-track Approvals Act 2024?

MTA **disagrees** that the project meets the overall intent of Section 22 for referral to the fast-track process.

While we acknowledge that the scheme provides electricity generation, we disagree that economic or energy benefits justify bypassing standard environmental scrutiny (RMA), fundamental freshwater flow management requirements, and cultural obligations.

We also disagree that using the fast-track process to accelerate consenting is appropriate for the Mangahao HEPS project. In the application, the Applicant seeks the fast-track pathway to avoid "flow restrictions" and "complex conditions" imposed under standard RMA processes. They frame essential environmental mitigations as an unacceptable "loss of energy production". Facilitating a project by truncating environmental and cultural safeguards at the referral stage imposes an unmitigated burden on the awa and Muaūpoko.

Topic	Applicant view	MTA view
Priority project	The Applicant relies on the policy document Electrify NZ and policies in the Horizons One Plan to argue priority status (Attachments 7 and 8).	Disagree. The Mangahao HEPS has not been specifically identified as a priority project on a central government infrastructure priority list or spatial strategy. Generic policy support for renewable energy under Electrify NZ does not override the statutory necessity under the NPS-FM and Te Tiriti o Waitangi to protect freshwater health, taonga species, and tangata whenua rights.
Continued functioning of existing regionally or nationally significant infrastructure	The scheme generates up to 39.9 MW with an annual output of ~131 GWh, meeting peak demand in the Horowhenua region.	Neutral MTA acknowledges that the physical asset exists and contributes to regional electricity supply. However, the "continued functioning" of existing infrastructure cannot be used as a justification to re-consent zero residual flows and permanent fish migration barriers for a further 35 years without restoration commitments that rectify the breach in tikanga. We have not had any success in developing or

		progressing these outcomes with King Country Energy.
Delivery of significant economic benefits	The Applicant defines economic benefits primarily as avoiding \$2M–\$4M in RMA-based consenting/hearing costs and avoiding lost generation output that might occur under RMA river restoration requirements.	Disagree. Avoiding necessary expenditure on river health, residual flows, and fish passage transfers costs onto the awa and Muaūpoko. It is not a public economic benefit.
Support for climate change mitigation	The scheme supports climate change mitigation by generating renewable energy and reducing greenhouse gas emissions by approximately 67,830 tCO ₂ -e (gas equivalent).	Neutral. MTA supports decarbonisation and climate change mitigation. However, climate change mitigation should not come at the expense of healthy freshwater ecosystems and taonga species. That is maladaptive. Climate change mitigation and freshwater health are entwined, and should not be traded off. In addition, there has been no assessment of alternatives to the firming power that this station provides over the next 30 years compared to batteries combined with wind/solar, when prices for these alternatives have dropped dramatically so that they have become, according to the IEA, the cheapest power in history. https://lowcarbonenergy.co/news/solar-is-now-the-cheapest-form-of-energy-in-history-says-iea/ Nor has the impact of climate change on reservoir water levels over the next 30 years been assessed. See below.
Addressing significant environmental issues	The Applicant states that the scheme will not cause any "material change in environmental effects" (Attachment 7) and	Disagree. The scheme itself creates unmitigated environmental issues. Although there will be no <i>change</i> in the type of environmental effects, there are a number of significant existing unmanaged effects that physically

	claims it addresses environmental issues through greenhouse gas reduction (s2.6.1.11).	and biologically impact the HEPS catchment, and culturally impact Muaūpoko.
Consistency with local or regional planning documents	The Applicant states the project is consistent with the Horizons Regional Policy Statement and Regional Plan as existing significant infrastructure.	Conditionally agree. MTA acknowledges that hydroelectricity generation is enabled in the Horizons One Plan. However, the scheme's current unmitigated effects conflicts with direction set by the NPS-FM and matters of control under the One Plan, which prioritises the health and well-being of waterbodies and freshwater ecosystems. We believe the application has not struck the right balance between providing for commercial and environmental values.

Anticipated and known adverse effects of the project on the environment, and the significance of those effects

We have reviewed the Applicant's description of the anticipated and known adverse effects of the project, and the significance of those effects.

Based on the information provided in the referral application, MTA disagree with the Applicant's description of those effects.

The Applicant's summary in Attachment Seven characterises environmental and hydrological impacts as having "no material change" and limits cultural effects to high-level, generalised concerns. This assessment significantly understates the severity of the scheme's impacts on the freshwater environment and Muaūpoko values.

We highlight the following areas of concern. If the application is referred, these topics will be contentious during the substantive stage:

- **Hydrology and minimum flows:**
The Applicant seeks to continue taking 100% of the water in upper river sections of the Tokomaru, and middle sections of the Mangahao, without establishing residual flows. MTA maintains that zero residual flow is ecologically and culturally unacceptable.
- **Freshwater ecology and fish passage:**
Dry riverbeds result in total loss of habitat values and permanent dam structures obstruct the migration of taonga species (tuna, kōkopu, kōaro, torrent fish). Relying on basic "catch and release" measures is insufficient to address the scheme's full impact on habitat and migration.
- **Sedimentation and river dynamics:**

Dams trap sediment and periodic sluicing releases heavy sediment loads, altering riverbed geomorphology, deoxygenating waterways and smothering downstream aquatic habitats. The Mangaora is subject to erosive flows during discharges from the scheme. Significant work is needed to manage these effects and there must be the opportunity for our experts to feed into this mahi during a robust evidence, conferencing and hearing process.

- **Mauri and ki uta ki tai:**

Inter-catchment water transfers disrupt the natural flow of mauri through the awa. Taking from the awa requires us as kaitiaki to give back to the awa. There are no governance or kaitiaki arrangements proposed to date.

MTA understands that the substantive effects of the project will be fully evaluated if the referral application is approved. Should the Minister decide to refer the application despite our opposition, we will seek consent conditions that explicitly avoid, remedy, or mitigate these effects through mandatory minimum flows, ecological restoration initiatives, fish passage remedy or offset approaches, enduring access to sacred sites, and a co-governance/kaitiaki monitoring framework.

Under the Fast-track process, decision-making panels must have the appropriate technical and cultural expertise to comprehensively assess the merits and impacts of a project. The Mangahao HEPS is a technically complex project, and we have several concerns with the scheme in its current form. As such, we request that the appointed decision-making panel for this project include independent experts in the following areas:

- Mātauranga Māori, tikanga, and cultural health monitoring.
- Freshwater ecology and fish passage management.
- Hydrogeology and sediment dynamics.

Other matters - How the project will be affected by climate change and natural hazards

MTA is concerned that the project will potentially be affected by climate change and natural hazards.

We disagree with the Applicant's assessment that climate change "is not anticipated to have any material impact on the way in which the scheme operates" (Attachment 8).

The Applicant's hydrological assessment (Tonkin & Taylor) acknowledges that climate change may reduce mean summer/autumn flows, increase winter mean flows, increase low-flow event frequency and duration, and increase peak flood discharges. However, the Application fails to recognise that continuing to operate under a 35-year unmitigated extraction regime while climate conditions shift will compound existing environmental and cultural damage across the catchment. Although climate change may not have a material impact on the scheme "at this stage", a longer-term view is needed.

Our specific climate change and hazard concerns include:

- Reduced summer and autumn rainfall paired with the scheme's zero residual flow will further degrade habitats, extending the areas of dry riverbed or flow flows.
- Warmer water temperatures and prolonged low flows will increase toxic cyanobacteria and algal blooms, oxygen depletion, and impacts on taonga species.
- Higher-intensity and more frequent rain events will change flood flow behaviour and impacts (including scouring and bank instability).
- Seismic and landslide risks that arise from the geologically active landscape and ageing infrastructure will increase dam infilling requiring more intensive sluicing and associated effects.

Climate change impacts demonstrate why locking in a 35-year consent duration with no operational changes or minimum flow provisions is ecologically and culturally irresponsible. Should the application proceed, MTA seeks consent conditions that require:

- Adaptive flow management regimes that adjust water abstraction limits based on real-time climate, temperature, and ecological health indicators.
- Comprehensive dam safety, sediment flushing, and flood management plans developed in active partnership with MTA as kaitiaki.

Nāku iti noa, nā



Di Rump

CEO Muaūpoko Tribal Authority



**Te Mauri o Rangitāne o Manawatū (Council of Elders)
Tānenuiārangi Manawatū Charitable Trust Rōpu**

Part of the Rangitāne Nation

Phone: (06) 353 6385

**Te Hotu Manawa o Rangitāne o Manawatū Marae
Best Care (Whakapai Hauora) Charitable Trust
Te Ao Turoa Environmental Centre
Kahuku Enterprises
Kia Ora FM 89.8**

Physical Address: 140-148 Maxwells Line, Awapuni, Palmerston North 4412
Postal Address: PO Box 1341, Palmerston North Central, Palmerston North 4440

24 August 2026

Tēnā koutou,

Regarding: Rangitāne o Manawatū Comments on the Referral Application under the Fast Track Approvals Act 2024.

Statement of position

Rangitāne o Manawatū (ROM) through their environmental arm Te Ao Turoa Environmental Centre (TATEC) **do not support** the application by King Country Energy (Contact Energy) to refer the Mangahao Hydro-Electric Power Scheme (HEPS) for consideration under the Fast Track Approvals Act 2024.

RoM's position is that the application should be declined at the referral stage for the following reasons:

- The scheme is the oldest major hydroelectric scheme in NZ, opened in 1924, meaning that it was developed when understanding of the profound impacts of hydroelectric schemes on freshwater ecosystems was in its infancy (and impacts on iwi values not considered at all). Renewal/s have done very little to change this.
- The Applicant has entered into the Fast-Track process to avoid "flow restrictions" and "complex conditions" typically imposed under the RMA. This frames standard environmental protections as potential causes of "significant loss of energy production". Approving the referral on the basis that it would enable environmental conditions would be to pre-determine those issues.
- The Applicant seeks 35-year consents to maintain the current operational regime without committing to sufficient effects management measures in the Mangahao, Tokomaru and Mangaore Rivers.

Our status as a likely affected party under the FTAA

We consider ourselves affected by the project.

We are a relevant iwi authority under section 13(4)(j) of the Fast Track Approvals Act 2024.

Our association with the project area

RoM has the following associations, interests, values and taonga within the project area:



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Tānenuiārangi Manawatū Charitable Trust Rōpu**

Part of the Rangitāne Nation

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**Te Hotu Manawa o Rangitāne o Manawatū Marae
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Our association with the environment

- RoM has a longstanding cultural, spiritual, historical, and traditional relationship with the lands and waters of the Manawatū. Our customary rohe extends from the Tararua and Ruahine ranges across the Manawatū to the west coast, with the Manawatū Awa and its tributaries, forming an integral part of our identity, history, and relationship with the environment.
- RoM holds recognised cultural, spiritual, historical, and traditional associations with the Tararua Forest Park, the Mangahao Awa, the Manawatū Awa and its tributaries, including the Mangaore Stream and Tokomaru Awa. These associations are formally recognised through the RoM Deed of Settlement and Historical Claims (DOS-HC) (2016).
- Mātauranga-a-Rangitāne is founded on the understanding that all elements of the environment are interconnected. RoM therefore considers the health and wellbeing of waterways, their tributaries, groundwater, wetlands, and receiving environments as part of an interconnected whole. Our relationship with these environments carries an obligation to protect, enhance, and restore their mauri for current and future generations.

Wāhi tapu, wāhi tupuna, and taonga environments

- RoM has a longstanding cultural, spiritual, historical, and traditional association with the freshwater environments encompassing the Mangahao HEPS. The importance of these environments to RoM is formally recognised through the RoM DOS-HC, including statutory acknowledgements over the Mangahao Awa, Manawatū Awa and its tributaries and Tararua Forest Park.
- The Mangahao Awa, Tokomaru Awa, Mangaore Stream and associated freshwater environments are understood as part of an interconnected cultural landscape. For RoM, waterways, their tributaries, wetlands, groundwater, indigenous biodiversity, and surrounding whenua are not considered in isolation from one another. Collectively, these environments support mauri, cultural practices, mahinga kai, mātauranga, and the exercise of kaitiakitanga.
- RoM therefore considers the protection of wāhi tapu, wāhi tupuna, and taonga environments to extend beyond the protection of individual identified sites. It also requires recognition of the relationships and connections between wai, whenua, indigenous biodiversity, and the wider cultural landscape, and the ability of RoM to maintain its relationship with and exercise kaitiakitanga over these environments.

Taonga species



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Taonga species present in the scheme's catchments include long-finned eel (tuna), short fin eel (tuna), short-jaw kōkopu, giant kōkopu, banded kōkopu, kōaro, torrent fish, dwarf galaxiid, bullies, and lamprey. Historically, the waters supported Ūpokororo (grayling).

Existing dam structures eliminate fish passage to upper reaches, while artificial flow fluctuations, dry riverbeds, inter-catchment water transfers, and sediment sluicing degrade downstream habitats and cause fish injury and mortality.

Core Rangitāne o Manawatū values relevant to the project

- **Mauri** is the life-supporting essence that binds together the physical, spiritual and cultural elements of the natural world. RoM considers the protection and restoration of mauri to be fundamental to freshwater management. The health and wellbeing of RoM is inseparable from the health and wellbeing of wai. Maintaining the mauri of the Mangahao Awa, Tokomaru Awa, Mangaore Stream, and ultimately the Manawatū Awa requires the protection of natural ecological processes, healthy aquatic habitats, indigenous biodiversity and the ability of the river to sustain life.
- **Kaitiakitanga** describes our obligation to protect the physical, ecological, and spiritual health of our ancestral land and water as we have inherited responsibilities as kaitiaki of the natural environment. The exercise of kaitiakitanga requires meaningful involvement in environmental management and decision-making processes affecting ancestral lands and waters.
- **Mana whakahaere and tino rangatiratanga** encompass our inherent right to govern, manage, and hold decision-making authority over our ancestral resources. Leaving flow and operational decisions entirely to technical experts bypasses RoM rangatiratanga.
- **Interconnectedness of wai** recognises water as an interconnected whole. Freshwater management must recognise the connections between headwaters, rivers, tributaries, wetlands, groundwater, estuaries and receiving environments. Effects occurring in one part of a catchment may influence the health and wellbeing of connected environments and therefore must be considered holistically.
- **Mātauranga and Intergenerational Responsibility** recognises the protection and transmission of mātauranga, tikanga and cultural practices associated with freshwater environments. The ability of future generations to maintain relationships with waterways, undertake customary practices and exercise kaitiakitanga is an important consideration when assessing environmental effects.

Māori Land, marae and identified wāhi tapu within the project area

Section 13(4)(o) states a referral application must include information identifying the parcels of Māori land, marae, and identified wāhi tapu within the project area.



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There are no parcels of Māori land, and no RoM marae in the area.

There are a number of wāhi tapu surrounding the Mangahao HEPS site. The applicant has not asked us for this information to include in their application. This information is contained in our private iwi database and will be included in our Cultural Impact Assessment.

Consultation or notification by the Applicant

The applicant has notified RoM in writing about their intent to make a referral application for the scheme.

The nature of engagement to date has also included:

- We were procured to undertake a CIA in October 2024. However, we have not been able to progress this mahi because we lack information to understand how the scheme operates. We had a short series of hui around July 2025 to discuss the consenting programme and some fish data that had been collected.
- We have undertaken a site visit in late 2025.
- We recently held a workshop on 14th August 2026, where the project team presented information on effects on ecology and sediment.

Our role if the referral application is accepted

RoM have the status of a relevant iwi authority and intends to respond to the invitation to comment under s 53 of the Act, if the application is accepted for processing as a substantive application.

The referral application should be declined under section 21(3) or (4)

We consider that the Minister should decline the referral application for the following reason(s):

- the project may have significant adverse effects on the environment.

Our justification for this is as follows:

The project will have significant adverse effects on the environment



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Based on the information provided in the referral application, RoM consider that the Mangahao HEPS will have significant actual or potential adverse effects. Under RMA case law, significant adverse effects are those that carry a serious, noticeable environmental impact; the scheme's current unmitigated baseline operation inflicts continuous, high-level adverse impacts on the awa, ecosystems, and RoM cultural well-being.

Cultural and spiritual effects

- Taking water from the Mangahao and Tokomaru catchments and transferring it across catchment boundaries into Mangaore Stream severs ki uta ki tai pathways, disrupts mauri and breaches our tikanga. Mana whenua involvement and regenerative actions are the only way to manage these effects; this is not currently included in proposals.
- Decisions on water allocation, flow regimes, and river management may continue to be made exclusively by Western technical experts and regulators, without recognition of RoM decision-making authority, our tikanga and our mātauranga. This would suppress our tino rangatiratanga and mana whakahaere.
- Access to key traditional areas and wāhi tapu is restricted.

Effects on ecology

- Effects on ecology are also cultural effects.
- The existing dams on the Mangahao HEPS obstruct the upstream and downstream passage of taonga species, including long-finned eel (tuna), short-jaw kōkopu, giant kōkopu, banded kōkopu, kōaro, and torrent fish.
- The scheme extracts all available water in sections of the mid Mangahao and upper Tokomaru Rivers, leaving no residual flow. Correspondence with the applicant (July 2026) confirms that:
 - Downstream of No.2 Dam (Mangahao River), there is currently no residual flow, as required by consent. Flow relies on spill gate mechanisms and leakage.
 - Below No.3 Dam (Tokomaru River), the channel is dry for ~300 m before the tributaries provides small regenerating flow. The highly polluted downstream environment receives significantly less water, resulting in contaminant concentration buildups.

This large-scale take has degraded and destroyed instream aquatic habitats.

- Temporary coffer dams and instream desilting disturbance in No. 1 Reservoir (on Crown/DOC land) regularly disrupt benthic habitats and water quality. Correspondence with the applicant (July 2026) confirms:
 - Sediment management operations cause "sharp oxygen drops, and deposition of large quantities of sediment" downstream.
 - Water clarity downstream of dams consistently fails to meet Horizons One Plan targets.



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- Stream macroinvertebrate communities are severely depleted downstream of the Mangahao dams.
- The scheme creates large flow fluctuations in downstream habitats. Significant and rapid flow variations and tailrace discharges into the Mangaore Stream disrupt habitat stability and health.

Natural and physical resources of special value

- Water quality and riparian margins of rivers within the Tararua Ranges are extremely high quality and pristine, compared to the wide-scale degradation of the Manawatū catchment.

Discharge of contaminants (sediment)

- Dam infrastructure traps sediment, depriving downstream reaches of beneficial sediment transport. Periodic sluicing releases heavy sediment loads, causing widespread silt buildup, deoxygenates water, and makes downstream habitats uninhabitable for ika and other aquatic species.
- Altered flow regimes cause bank instability and gravel erosion downstream of the power station tailrace in the Mangaore Stream.

Landscape effects

- Hydropower infrastructure (dams, penstocks, surge chambers) has altered the natural character of the Tararua Ranges, including our sites of significance (our awa, our experiences from our significant mountain peaks, our traditional pathways and access to these places). They have significantly altered the natural landscape compared with what our tīpuna knew and what is contained within our mātauranga passed down over generations.

The Applicant's description of effects

The Applicant's assessment of effects in the referral application has gaps that we believe undermine its completeness, namely:

- An inaccurate baseline approach
- Incorrect framing of environmental mitigations as a burden
- The minimisation of cultural impacts
- Unaddressed data gaps



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The Applicant states that because no operational changes are proposed, "no material change in environmental effects is expected" (Attachments 7 and 8 of the referral application). This argument treats 100+ years of unmitigated environmental degradation (zero residual flows, total fish migration blockages) as an acceptable baseline, which is inappropriate to RoM. Expecting "no material change" simply means locking in continuous, significant adverse impacts on the awa and our taonga species.

In Attachment 7, the Applicant criticises standard RMA processes for introducing flow restrictions that result in a "loss of energy production" and "more complex conditions". This frames essential river management as negative process costs rather than necessary ecological and cultural requirements. The effects of the Mangahao HEPS, while they have existed since the 1920s, have not been rigorously assessed against the mātauranga and scientific knowledge we hold today. The allowance of adverse effects under the historical consent does not necessarily mean they are appropriate or exempt from review.

The Applicant reduces cultural effects to high-level references regarding "fish passage and loss of mauri" (Attachment 7). They record their engagement with iwi and hapū to date, but do not acknowledge the lack of technical information we have had to inform our CIA. This limits our ability to assess how the project will affect tino rangatiratanga, mana whakahaere, kaitiakitanga, intergenerational knowledge transfer, and broader catchment health ki uta ki tai. It also means we cannot provide targeted recommendations. We have put forward our views, based on high-level information received to date, about effects and the need to undertake restoration and fish passage offsetting, involving mana whenua, alongside in-scheme mitigations, but have not had any success in progressing these effects management approaches.

The Applicant acknowledges that technical assessments for aquatic ecology/fish passage (Ryder Consulting) and sedimentation (Tonkin & Taylor) are incomplete or high-level summaries, while iwi CIAs are still in progress. We have not received any drafts of the technical assessments. We note that completing a CIA without technical assessments would not be appropriate. Seeking fast-track referral before these baseline studies and cultural assessments are understood is premature.

Does the project meet the criteria in section 22 for consideration under the Fast-track Approvals Act 2024?

RoM disagrees that the project meets the overall intent of Section 22 for referral to the fast-track process.

While we acknowledge that the scheme provides electricity generation, we disagree that economic or energy benefits justify bypassing standard environmental scrutiny (RMA), fundamental freshwater restoration requirements, and cultural obligations.



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We also disagree that using the fast-track process to accelerate consenting is appropriate for the Mangahao HEPS project. In their application, the Applicant seeks the fast-track pathway to avoid "flow restrictions" and "complex conditions" imposed under standard RMA processes. They frame essential environmental mitigations as an unacceptable "loss of energy production". Facilitating a project by truncating environmental and cultural safeguards at the referral stage imposes an unmitigated burden on the awa and RoM values.

Topic	Applicant view	RoM view
Priority project	The Applicant relies on the policy document Electrify NZ and policies in the Horizons One Plan to argue priority status (Attachments 7 and 8).	Disagree. The Mangahao HEPS has not been specifically identified as a priority project on a central government infrastructure priority list or spatial strategy. Generic policy support for renewable energy under Electrify NZ does not override the statutory necessity under the NPS-FM and Te Tiriti o Waitangi to protect freshwater health, taonga species, and tangata whenua rights.
Continued functioning of existing regionally or nationally significant infrastructure	The scheme generates up to 39.9 MW with an annual output of ~131 GWh, meeting peak demand in the Horowhenua region.	Neutral RoM acknowledges that the physical asset exists and contributes to regional electricity supply. However, the "continued functioning" of existing infrastructure cannot be used as a justification to re-consent zero residual flows and permanent fish migration barriers for a further 35 years without restoration commitments that rectify the breach in tikanga. We have not had any success in developing or progressing these outcomes with King Country Energy.
Delivery of significant economic benefits	The Applicant defines economic benefits primarily as avoiding \$2M–\$4M in RMA-based consenting/hearing costs and avoiding lost generation output that	Disagree. Avoiding necessary expenditure on river health, residual flows, and fish passage transfers costs onto the awa and RoM. It is not a public economic benefit.



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Topic	Applicant view	RoM view
	might occur under RMA river restoration requirements.	
Support for climate change mitigation	The scheme supports climate change mitigation by generating renewable energy and reducing greenhouse gas emissions by approximately 67,830 tCO ₂ -e (gas equivalent).	Neutral. RoM supports decarbonisation and climate change mitigation. However, climate change mitigation should not come at the expense of healthy freshwater ecosystems and taonga species. That is maladaptive. Climate change mitigation and freshwater health are entwined and should not be traded off. In addition, there has been no assessment of alternatives to the firming power that this station provides over the next 30 years compared to batteries combined with wind/solar, when prices for these alternatives have dropped dramatically so that they have become, according to the IEA, the cheapest power in history. https://lowcarbonenergy.co/news/solar-is-now-the-cheapest-form-of-energy-in-history-says-iea/ Nor has the impact of climate change on reservoir water levels over the next 30 years been assessed. See below.
Addressing significant environmental issues	The Applicant states that the scheme will not cause any "material change in environmental effects" (Attachment 7) and claims it addresses environmental issues through greenhouse gas reduction (s2.6.1.11).	Disagree. The scheme itself creates unmitigated environmental issues. Although there will be no <i>change</i> in environmental effects, there are a number of significant existing unmanaged effects that physically and biologically impact the HEPS catchment and culturally impact RoM.



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Topic	Applicant view	RoM view
Consistency with local or regional planning documents	The Applicant states the project is consistent with the Horizons Regional Policy Statement and Regional Plan as existing significant infrastructure.	Conditionally agree. RoM acknowledges that hydroelectricity generation is enabled in the Horizons One Plan. However, the scheme's current unmitigated effects conflicts with direction set by the NPS-FM and matters of control under the One Plan, which prioritises the health and well-being of waterbodies and freshwater ecosystems. We believe the application has not struck the right balance between providing for commercial and environmental values.

Anticipated and known adverse effects of the project on the environment, and the significance of those effects

We have reviewed the Applicant's description of the anticipated and known adverse effects of the project, and the significance of those effects.

Based on the information provided in the referral application, RoM disagree with the Applicant's description of those effects.

The Applicant's summary in Attachment Seven characterises environmental and hydrological impacts as having "no material change" and limits cultural effects to high-level, generalised concerns. This assessment significantly understates the severity of the scheme's impacts on the freshwater environment and RoM values.

We highlight the following areas of concern. If the application is referred, these topics will be contentious during the substantive stage:

- **Hydrology and minimum flows:**
The Applicant seeks to continue taking 100% of the water in upper river sections of the Tokomaru, and middle sections of the Mangahao, without establishing residual flows. RoM maintains that zero residual flow is ecologically and culturally unacceptable.
- **Freshwater ecology and fish passage:**



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Dry riverbeds result in total loss of habitat values and permanent dam structures obstruct the migration of taonga species (tuna, kōkopu, kōaro, torrent fish). Relying on basic "catch and release" measures is insufficient to address the scheme's full impact on habitat and migration.

- **Sedimentation and river dynamics:**

Dams trap sediment and periodic sluicing releases heavy sediment loads, altering riverbed geomorphology, deoxygenating waterways and smothering downstream aquatic habitats. The Mangaore is subject to erosive flows during discharges from the scheme. Significant work is needed to manage these effects and there must be the opportunity for our experts to feed into this mahi during a robust evidence, conferencing and hearing process.

- **Mauri and ki uta ki tai:**

Inter-catchment water transfers disrupt the natural flow of mauri through the awa. Taking from the awa requires us as kaitiaki to give back to the awa. There are no governance or kaitiaki arrangements proposed to date.

RoM understands that the substantive effects of the project will be fully evaluated if the referral application is approved. Should the Minister decide to refer the application despite our opposition, we will seek consent conditions that explicitly avoid, remedy, or mitigate these effects through mandatory minimum flows, ecological restoration initiatives, fish passage remedy or offset approaches, enduring access to sacred sites, and a co-governance/kaitiaki monitoring framework.

Under the Fast-track process, decision-making panels must have the appropriate technical and cultural expertise to comprehensively assess the merits and impacts of a project. The Mangahao HEPS is a technically complex project, and we have several concerns with the scheme in its current form. As such, we request that the appointed decision-making panel for this project include independent experts in the following areas:

- Mātauranga Māori, tikanga, and cultural health monitoring.
- Freshwater ecology and fish passage management.
- Hydrogeology and sediment dynamics.

Other matters - How the project will be affected by climate change and natural hazards

RoM is concerned that the project will potentially be affected by climate change and natural hazards.

We disagree with the Applicant's assessment that climate change "is not anticipated to have any material impact on the way in which the scheme operates" (Attachment 8).



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The Applicant's hydrological assessment (Tonkin & Taylor) acknowledges that climate change may reduce mean summer/autumn flows, increase winter mean flows, increase low-flow event frequency and duration, and increase peak flood discharges. However, the Applicant fails to recognise that continuing to operate under a 35-year unmitigated extraction regime while climate conditions shift will compound existing environmental and cultural damage across the catchment. Although climate change may not have a material impact on the scheme "at this stage", a long-term view is needed.

Our specific climate change and hazard concerns include:

- Reduced summer and autumn rainfall paired with the scheme's zero residual flow will further degrade habitats.
- Warmer water temperatures and prolonged low flows will increase toxic cyanobacteria/algal blooms, oxygen depletion, and impacts on taonga species.
- Higher-intensity and more frequent rain events will change flood flow behaviour and impacts (including scouring and bank instability).
- Seismic and landslide risks that arise from the geologically active landscape and ageing infrastructure.

Climate change impacts demonstrate why locking in a 35-year consent duration with no operational changes or minimum flow provisions is ecologically and culturally irresponsible. Should the application proceed, RoM seeks consent conditions that require:

- Adaptive flow management regimes that adjust water abstraction limits based on real-time climate, temperature, and ecological health indicators.
- Comprehensive dam safety, sediment flushing, and flood management plans developed in active partnership with RoM as kaitiaki.

Heoi anō rā

Danielle Harris, O.N.Z.M, LLB, PGDipBusAdmin

Tumuaki - Chief Executive Office



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