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To: West Coast Regional Council and the Buller District Council

From: Greenpeace New Zealand Incorporated

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**Submission on all the resource consent applications by Meridian Energy to dam the Mohikinui River.**

**GREENPEACE OPPOSES THE APPLICATION IN ITS ENTIRETY**

Greenpeace New Zealand opposes the application in its entirety.

**GREENPEACE WISHES TO BE HEARD**

Greenpeace New Zealand wishes to be heard in support of its submission.

**THE ADVERSE EFFECTS OF THE PROPOSAL ARE SIGNIFICANT**

Although Greenpeace New Zealand generally supports renewable energy projects, it opposes Meridian Energy's application for a hydro electricity scheme on the Mohikinui River because the proposal will cause significant environmental damage, is unnecessary and is contrary to the purpose and principles (Part 2 matters) of the Resource Management Act 1991 ("RMA").

The proposal would cause significant negative environmental effects that cannot be avoided, remedied or mitigated. In summary, the following adverse effects on the environment are more than minor:

- Loss of the natural character of the river, including the river mouth and associated coastal environment
- Significant alterations in the flow regime of the river resulting in possible adverse effects on the water habitat, including quality and temperature
- Loss of river habitat in the gorge, including for a number of threatened species
- Loss of extensive forest associations in the gorge

- Negative effects on invertebrates
- Long term negative impacts upon the river system, including upstream of the dam reservoir, within the foot print of the reservoir and downstream to the estuary and coastal margin
- Change in sediment patterns, including the loss of sediment transfer to the lower river, coast - and the effect of sediment accumulation on the river gorge, and the change in capacity of the river to transfer sediment resulting in accumulation
- Adverse effects on aquatic ecosystems of tributaries in the gorge and lower river
- Loss of public access
- Adverse effects on the landscape values of the catchment, including the river system and forest ecosystems
- Adverse effects on recreational and amenity values
- Loss of historical and cultural associations
- Increase in greenhouse gas emissions and loss of forest capacity as a carbon store
- Destruction of wilderness
- Hydrological effects - loss of connectivity
- Cumulative effects of all effects and overall loss of biodiversity

### **BENEFITS OF THE PROPOSAL ARE OUTWEIGHED BY ADVERSE EFFECTS**

The positive effects on the environment in relation to energy are overstated as there are feasible alternatives to the substantial damage to the Mokihinui River environment and its value to the community.

The objective in the RMA of promoting renewable energy is aimed at reducing New Zealand's greenhouse gas emissions and shifting New Zealand's energy production to less environmentally damaging forms of generation. In the specific case of this application the benefits of the proposal are outweighed by the requirement to protect the life supporting capacity of the river's ecosystem, avoid remedy or mitigate adverse effects on the environment, to maintain the natural character of waterways and to protect the significant indigenous vegetation and the habitats of indigenous fauna. The proposal fails on all these counts.

The claimed benefit of this project in reducing greenhouse gas emissions is significantly reduced through the proposed destruction of carbon stocks in native forest to be flooded by the scheme and the subsequent release of carbon dioxide and methane from the decomposition of the flooded forest. Methane is a particularly potent greenhouse gas as its forcing effect on the climate is many times the effect of carbon dioxide and its eventual oxidation in the atmosphere leads to the accumulation of carbon dioxide.

The electricity from this project is likely to help drive increased coal mining and dairy conversions on the West Coast, both very significant contributors to greenhouse gas emissions. Coal mining (particularly for export) and dairying are fast-growing New Zealand contribution to causing climate change.

## **BETTER ALTERNATIVES EXIST**

There are better alternatives for promoting renewable energy and reducing greenhouse gas emissions that avoid the environmental damage this project will cause. For example, when Project Aqua was proposed, the Energy Efficiency and Conservation Authority identified simple energy efficiency measures that would have saved 30% of the electricity Project Aqua would have generated at one tenth of the cost.

Alternatives include:

- Investment in energy efficiency and conservation (so that money is spent to reduce demand rather than increase supply)
- Investment in wind and geothermal energy (which is presently occurring at the right rate to meet the Government's target of 90% renewable energy by 2025)
- Constraining the expansion of energy intensive coal mines and dairy farming on the West Coast and elsewhere through appropriate land-use policies

Geoff Keey

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