



Sustainable Energy Forum Inc  
PO Box 11-152  
Wellington  
New Zealand  
Phone 04 586 2003  
Fax 04 586 2004  
[info@sef.org.nz](mailto:info@sef.org.nz)  
<http://www.sef.org.nz>

12 March 2004

**Minister for the Environment  
Project Aqua and Waitaki Called in Application Submission,  
Free Post # 1201, PO Box 1, Christchurch**

**SUBMISSION ON RESOURCE CONSENT APPLICATION CRC031800  
PROJECT AQUA, LODGED BY MERIDIAN ENERGY LTD**

SUBMISSION FROM  
**SUSTAINABLE ENERGY FORUM**

**1) Our Name & Address**

Sustainable Energy Forum Inc  
PO Box 11-152  
WELLINGTON  
Phone: 04 586 2003  
Fax: 04 586 2004  
Email: [info@sef.org.nz](mailto:info@sef.org.nz)  
Contact: John Blakeley, Convenor.

**2) We wish to be heard in support of our submission.**

**3) Background on the Sustainable Energy Forum**

- 3.1 The objective of the Sustainable Energy Forum is to facilitate the transition to sustainable energy. The Forum has over 125 individual and corporate members, including business people, academics and interested individuals. The Forum is not generally opposed to the development of new hydro power systems that meet acceptable environmental and economic criteria. The reported economic cost and environmental costs of this project appear to be disproportionate to the net benefit to New Zealand of the incremental improvement in electricity supply.

**4) Our Submission**

- 4.1 The Forum generally supports renewable energy developments including new hydro-power systems that meet acceptable environmental and economic criteria. However, the reported economic cost and environmental costs of this project appear to be disproportionate to the net benefit to New Zealand of the incremental improvement in electricity generation.

- 4.2 Accordingly, the Sustainable Energy Forum (SEF) **OPPOSES** application CRC031800 Waitaki River Flows lodged by Meridian Energy Ltd with respect to the proposed Project Aqua Hydro development.
- 4.3 Our reasons for opposing this application include, but are not limited to, adverse impacts from failure to identify, plan and implement demand management and demand reduction measures which would help avoid the need for the project.
- 4.4 SEF believes that every renewable energy project, from whatever energy source, must be judged on its own merits and must comply with all statutory requirements, including RMA, water allocation procedures.
- 4.5 Large scale renewable energy projects have much larger environmental and other impacts than others, and in each case the impacts must be weighed against the benefits of a reduction in greenhouse gas and other emissions in comparison with alternative projects using other energy sources.
- 4.6 Meridian has not adequately demonstrated that they have considered alternative means of influencing demand (including financially assisting, not just "promoting", efficiency measures).
- 4.7 Meridian has not adequately worked to address the highest priority issue raised in the Parliamentary Commissioner for the Environment's Assessment framework of the electricity sector.
- First priority is to manage growth in electricity demand and promote energy efficiency and facilitating active demand side management. (Electricity Energy and the Environment)
- 4.8 We request the Consent Authority to **decline this applications** lodged by Meridian Energy Ltd relating to Project Aqua until substantial new electricity demand reduction and demand management actions are implemented for Meridian Energy's customers.

ENDS

We have sent a copy of our submission to:  
Meridian Energy Ltd c/o Anderson Lloyd Cauldwell, Private Bag 1959, Dunedin 9020.