



**Submission to the Waikato Regional
Council on the Proposed Waikato Regional
Plan Change 1 – Waikato and Waipa River
Catchments**

By

Contact Energy Limited

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Submission

1. Introduction

This is the submission of Contact Energy Limited (“**Contact**”) on the *Proposed Waikato Regional Plan Change 1 – Waikato and Waipa River Catchments* published by the Waikato Regional Council (WRC). Contact appreciates the opportunity to provide input into the proposed Regional Plan Change.

Contact does not wish to be heard in support of this submission.

2. Background

Contact owns and operates a number of significant thermal (Te Rapa) and geothermal (Wairakei, Te Mihi, Ohaaki, Poihipi and Te Huka) power stations in the Waikato region. Each of these operations rely to varying extents on the take and discharge of water (including geothermal water) from or into the Waikato River, its tributaries, or lands hydraulically connected to the river. The process of creating electricity from geothermal steam and fluid uses large volumes of cooling water sourced from the Waikato River, and Contact discharges both separated geothermal water and cooling water with added contaminants at a number of different locations along its course.

All of those operations are allowed for by current resource consents and conditions, and the effects of the discharge of contaminants from these operations on the health and wellbeing of the River has been assessed and determined as part of the resource consent processes.

Contact is also a significant rural landowner in its own right. Its extensive geothermal steamfields contain wells, pipework and other significant equipment. Large areas are grassed and are either mown or farmed by third parties. Contact therefore has an interest in the proposed plan change from both a point source discharge and diffuse discharge point of view, as well as a corporate citizen with a stake in helping to improve the health, wellbeing and mauri of the River.

As a major stakeholder and a significant user of water from the Waikato River, Contact supports the objectives of the plan change to improve the health and protection of the Waikato River for future generations. The objectives of the plan change align with Contact's internal policy on water which is detailed later in this submission.

Our internal 'Tikanga' has a set of principles and commitments which provide guidance for everyday decision making. These ensure that we understand and manage the environmental impacts of our activities and add value to the resources under our care. Contact is committed to playing its part in improving the quality and the mauri of water and acknowledge the significant role that we play on the Waikato River.

3. Need for an NES

Contact supports the intention of the plan change to “*restore water quality within the Waikato River so that it is safe for people to swim in and take food from along its entire length*”. Contact's work to develop a water position statement to guide the company's decision making around its use of freshwater identified that New Zealanders care deeply about water and water degradation was a key concern.

Contact's commitment to water is as follows:

- *We believe that water is for all New Zealanders to share and that no one owns water.*
- *Certainty and longevity of access to water for sustainable economic development is a cornerstone for our country's success.*
- *Contact will work to enhance and improve the quality and mauri of water.*
- *Contact's continued access to water is a privilege and comes with responsibilities that define our use, management and stewardship of water. This approach should enable the continued sustainable uses*

and values of water from a cultural, recreational and economic perspective.

- *Contact will maximise the efficiency of our water use, and we must constantly review those needs to find further efficiencies to return water back into the system for other users.*
- *We share these responsibilities with others and we must have open, collaborative relationships that work to ensure every one of us plays our part in improving our waterways.*
- *We recognise the principles of the Treaty of Waitangi and the relationship that tangata whenua have with water as kaitiaki.*

4. Policies

As an operator of industrial sites with point source discharges, we are supportive of policies 10, 12 and 13 which provide good balance between supporting the continued operation of regionally significant infrastructure and ensuring that the Vision and Strategy for the Waikato River is met by encouraging the adoption of best practice and/or offsetting approaches.

We also support the intent of policy 11, to encourage the adoption of the best practicable option and to enable offsets, however the wording implies that all adverse effects of a point source discharge must be avoided, mitigated, or, if that is not possible, offset to ensure positive effects on the environment. It is our belief that total removal of all adverse effects in many cases will be infeasible and impractical and mitigation needs to be relative to the scale of the effect in light of the Plan objective, River values and timeframe. A process of continued improvement is considered more achievable than attempting to eliminate or offset all effects at once.

We therefore submit that the wording of policy 11 is changed from '*all adverse effects*' to '*any significant adverse effect*'.

It should also be noted that policy 4 for diffuse discharges reads “*enabling activities with lower discharges to continue or to be established while signalling further change may be required in the future.*” If lower diffuse discharges are permitted this should also be applied to lower point source discharges, so long as cumulatively, the achievement of the objectives are not compromised.

6. Summary

In general, Contact supports the Waikato Regional Plan change and are committed to playing our role in protecting the health of the Waikato River. However, as detailed above, Contact submits that refinements are required to the policy 11 to:

- a. Ensure that all adverse effects of a point source discharge are not required to be avoided, mitigated or offset;
- b. To allow existing and low discharging activities to continue or to be established for both point source and diffuse source discharges;

7. Contact Details

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