



13 November 2019

Interim Climate Change Committee  
PO Box 10362  
WELLINGTON 6143

By email: [feedback@ICCC.mfe.govt.nz](mailto:feedback@ICCC.mfe.govt.nz)

### CALL FOR EVIDENCE: INTERIM CLIMATE CHANGE COMMITTEE

Trustpower Limited (Trustpower) thanks the Interim Climate Change Committee (ICCC) for the opportunity to provide evidence on options to reduce greenhouse gas emissions over the period 2022-2025.

Section B of the Response Form indicates the ICCC is considering the types of policies that might be required to reduce emissions, and what actions/interventions might be required to meet the 2050 emissions target (Question 2).

**Trustpower considers that the greatest risk currently facing the reduction of GHG emissions is the draft National Policy Statement for Freshwater (NPSFM) and proposed National Environmental Standard for Freshwater (NESFM).**

**Trustpower has evidence to suggest there will be an adverse impact on New Zealand's ability to meet 2050 climate change targets.**

#### The Freshwater Policy Example

New Zealand's existing hydro-electricity generation infrastructure provides a substantial and extremely valuable contribution to New Zealand's energy needs and underpins the nation's commitment to a low emissions economy. The proposed NPSFM and draft NESFM will limit the contribution that hydro-electricity generation can make to New Zealand's low emissions economy in the future.

Trustpower engaged independent economic consultants, Sapere Ltd, to assess how the freshwater reform might show up for the energy sector. Their work confirms that currently there is a disjoint between the national water and emissions objectives.

The Sapere Report (2019) further states that:

*"We estimate the increase in annual emissions associated with limiting water use for hydro-electricity generation in order to meet freshwater objectives to be **629 kt CO2-e**. This represents an increase in emissions from public electricity and heat production of 1.9% compared to 2017 emissions and is equivalent to an increase in total net emissions of 1.1% compared to 2017. Of this increase in emissions, around 30% arises from changes in the operation of non-accepted hydro-electricity generators."*

Trustpower's cover letter and submission recently provided to the Ministry for the Environment on the proposed NPSFM and draft NESFM is attached for information. The Sapere Report can be found in Appendix B to Trustpower's submission.

For any questions relating to the material in this submission, please contact [annabel.davies@trustpower.co.nz](mailto:annabel.davies@trustpower.co.nz)

Regards,

A handwritten signature in blue ink, appearing to read "Annabel Davies". The signature is fluid and cursive, with the first name and last name clearly distinguishable.

**ANNABEL DAVIES**  
**RISK, REGULATORY, STAKEHOLDER MANAGER**