



Response to Public Consultation Comments

Project Name: Clyde and Roxburgh

Project Proponent: Contact Energy

Public Comment Period: 18/12/2023 – 16/02/2024

Report Author: Simon Howard, Helen Locher, Dayang Zanariah Binti Abang Kashim

Report Date: 5/11/2023

Summary

Assessment details	Clyde and Roxburgh Project was assessed in its Operation Stage against the Hydropower Sustainability Standard. The assessment was conducted by Simon Howard, Helen Locher, Dayang Zanariah Binti Abang Kashim. The on-site assessment took place on 2-6 October 2023.
Project details	Clyde and Roxburgh Project is a 432+320MW project on the Central Otago, New Zealand. The project sponsor is Contact Energy.
Assessment report	Assessment report is available on the HSA website following this link .
Purpose of this Response Document	<p>In accordance with the HS Assurance System, the project’s HS Standard assessment report undergoes a 60-calendar day public comment period. At the close of the public comment period, a 30-calendar day period is available for the Accredited Assessor to respond to comments and revise the report in conjunction with the Project Proponent. The Assessor must respond to each comment, and to make a justified determination on whether there is a need to amend any parts of the report.</p> <p>In the event that the Accredited Assessor identifies the need to amend the report in response to comments, the amended report is published within 30 days on both the Project Proponent’s website, and on the HSA website. The Final Assessment Report must include an annex outlining the changes made/not made in response to comments received.</p> <p>This response document represents compliance with Section 5 of the HS Assurance System.</p>
Approach to Consultation	<p>The 60-calendar day period for public comment on the Clyde and Roxburgh Project HS Standard assessment report run from 18 December 2023 – 16 February 2024. The preliminary assessment report was published on 18 December 2023 on HSA website and on Project Proponent Website in English. The report was shared with the project-affected communities identified in the report (pg.84-85) by email and website.</p> <p>Within the consultation period, one comment was received on the Clyde and Roxburgh Project HS Standard assessment report.</p>

Conclusion	The assessors concluded that the assessment report needs minor amendments for clarification regarding HSS-6 Biodiversity and Invasive Species, but this does not affect the scoring or report conclusion. The revised assessment report will be available on the HSA website .
Layout of this Response Document	This document consists of three sections. Section 1 includes acknowledgement of comments received; Section 2 includes general comments, which do not directly correspond to specific sections of the HS Standard; Section 3 contains responses to comments related to specific sections of the HS Standard; and Section 4 indicates whether the report needs amending. Annex I contains a full set of original comments received.

1. Response to General Comments

Table 1 below presents issues raised, which do not refer to specific sections of the HS Standard. Issues have been paraphrased and summarised. Annex I contains a full set of original comments received.

Table 1 – Responses to general issues

General issues	Assessor Response

3. Response to HS Standard section-specific comments

Table 2 below presents issues raised, which are related to specific sections of the HS Standard. Annex I contains a full set of original comments received.

Table 2 – Responses to HS Standard section-specific issues

Section-specific issues	Assessor Response
HSS-1: Environmental and Social Assessment and Management	
No section-specific comment received	
HSS-2: Labour and working conditions	
No section-specific comment received	
HSS-3: Water Quality and Sediments	

No section-specific comment received	
HSS-4 Community Impacts and Infrastructure Safety	
No section-specific comment received	
HSS-5 Resettlement	
No section-specific comment received	
HSS-6 Biodiversity and Invasive Species	
<p><i>From Comment 1:</i> I have now read the full report with interest, and disappointment.</p> <p>The Biodiversity and invasive species section is rather confused. It appears the author has a very anti sportsfish stance which is out of line with their value to the community and Contacts present involvement via the sportsfish management plan to improve sportsfish habitat and return rates.</p> <p>Regarding salmon and trout as invasive at every turn is a rather simplistic approach to a modern world view. Salmon around the world are in decline (native north Americans have been to NZ recently to look at returning viable salmon populations to their native homelands) and in the Clutha river below the dams they are near extinction – largely caused by disruption by dams to their migratory patterns. There seems to be no recognition of that fact.</p> <p>Page 57 is particularly irritating; <i>The assessment included habitat restoration and spawning areas for Galaxiids (e.g., Īnanga and Giant Kōkopu) as native species and comparable evaluations for salmonids (salmon and trout), which are categorised as invasive aquatic species.</i></p> <p>Why would a company bother to enhance the wellbeing of an invasive aquatic species? Quite simply because, invasive or not, they are a Sportsfish and recognised in statute (Conservation Act and RMA s7h)</p>	<p>Thank you for your detailed feedback on the biodiversity and invasive species section of our report.</p> <p>The section was written in line with international guidelines on biodiversity, such as the International Finance Corporation's Performance Standard 6 (IFC PS6), the Convention on Biological Diversity and International Union for Conservation of Nature (IUCN). These guidelines aim to protect biodiversity and manage natural resources sustainably. Following these guidelines, species classification depends on factors like origin, biodiversity impact, ecosystem function, and alignment with conservation objectives.</p> <p>In New Zealand, salmon and trout were introduced from the Northern Hemisphere and are not native. Under the guidelines they could be classified as non-native and also potentially invasive depending on demonstrated impact. If introduced species compete with, displace or negatively affect native species and ecosystems, they may be considered invasive.</p> <p>The guidelines encourage balancing ecological impact with socioeconomic benefits like sportsfishing and economic contributions. Specific classification is a nuanced decision</p>

<p>Making the invasive species list even less plausible is the reference to Asian Date mussel and Rudd which isn't present in the catchment as far as I know, and curiously native Koura which are pretty rare in the mainstem but present in dams in the tributaries seems to have made the same list.</p>	<p>considering ecological impacts, benefits, and alignment with biodiversity conservation goals. This balanced approach supports sustainable resource management alongside human use and values. In our assessments, we did not encounter evidence of salmon or trout substantially impacting native ecosystems, species, or conservation efforts. As such, we propose to revise the report to classify salmon and trout as non-native rather than invasive.</p> <p>We recognise the global decline in salmon populations and complex conservation challenges like human-made barriers. Our intention was to focus on ecological dynamics rather than overlook salmon conservation efforts like those on the Clutha River.</p> <p>The mention of habitat restoration for Galaxiids and the comparative evaluation for salmonids was intended to highlight ongoing conservation efforts for both native and introduced species, acknowledging the legal recognition of salmonids as sportsfish. The inclusion of species such as the Asian Date mussel and Rudd, and the reference to native Koura, were based on available data and reports at the time of writing but the presence and distribution of these species can vary so we have amended the report in line with your observation and removed them.</p>
<p>HSS-7 Indigenous Peoples</p>	
<p>No section-specific comment received</p>	
<p>HSS-8 Cultural Heritage</p>	
<p>No section-specific comment received</p>	

HSS-9 Governance and Procurement	
No section-specific comment received	
HSS-10 Communications and Consultation	
No section-specific comment received	
HSS-11 Hydrological Resource	
No section-specific comment received	
HSS-12 Climate Change Mitigation and Resilience	
No section-specific comment received	

4. Conclusions

The assessors concluded that the assessment report needs minor amendments for clarification regarding the biodiversity topic, but this does not affect the scoring or report conclusion. The assessment report will remain available on the HSA website www.hs-alliance.org in its original form.

Annex I: Original comments received

COMMENT 1

Name	Ian Hadland
Company	Otago Fish and Game Council
Job Title	Chief Executive
Comments	<p>I have now read the full report with interest, and disappointment.</p> <p>The Biodiversity and invasive species section is rather confused. It appears the author has a very anti sportsfish stance which is out of line with their value to the community and Contacts present involvement via the sportsfish management plan to improve sportsfish habitat and return rates.</p> <p>Regarding salmon and trout as invasive at every turn is a rather simplistic approach to a modern world view. Salmon around the world are in decline (native north Americans have been to NZ recently to look at returning viable salmon populations to their native homelands) and in the Clutha river below the dams they are near extinction – largely caused by disruption by dams to their migratory patterns. There seems to be no recognition of that fact.</p> <p>Page 57 is particularly irritating; <i>The assessment included habitat restoration and spawning areas for Galaxiids (e.g., Īnanga and Giant Kōkopu) as native species and comparable evaluations for salmonids (salmon and trout), which are categorised as invasive aquatic species.</i></p> <p>Why would a company bother to enhance the wellbeing of an invasive aquatic species? Quite simply because, invasive or not, they are a Sportsfish and recognised in statute (Conservation Act and RMA 57h)</p> <p>Making the invasive species list even less plausible is the reference to Asian Date mussel and Rudd which isn't present in the catchment as far as I know, and curiously native Koura which are pretty rare in the mainstem but present in dams in the tributaries seems to have made the same list.</p> <p>Anyway, you have probably picked up the tone, I'll leave it with you to edit unless you'd like more detail or background.</p>