

MEMORANDUM



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To: The Hearing Commissioners – Proposed Canterbury Land and Water Regional Plan, Hearing Group 1

From: Lionel Hume and Chris Allen, Combined Canterbury Provinces, Federated Farmers of New Zealand

Subject: Responses to questions asked by the hearing panel at the LWRP Group 1 hearing on 12 April, 2013

Date: 18 June 2013

Question 1 from Commissioner Rob van Voorthuysen

This question arose from Federated Farmers' submission about Policy 4.71 (paragraph 31 of our submission), where we stated the view that water transfers would not address over allocation issues, and that allocation issues (where they exist) should be addressed directly. Commissioner van Voorthuysen asked whether there should be a new policy to deal with over-allocation.

In response we emphasise the following principles:

1. The first priority must be to ensure that allocation limits are in the right place to begin with i.e. that surface water and groundwater limits are set via a rigorous collaborative, science-informed, catchment based process. This is largely not the case at present. The sub-regional plan process is in its early stages and, in the case of groundwater, most limits are set using first order methodology, even where the information exists to use third order methodology.
2. Where there is genuine over-allocation, a collaborative catchment-based approach should be adopted for its resolution.
3. Any resolution must recognise existing investment in both on-farm and off-farm infrastructure.
4. Any resolution must facilitate appropriate behaviours (for example, where consent holders have water that is surplus to their requirements, facilitate applications for consent variation so that there is no cost or down-side risk to the applicant).

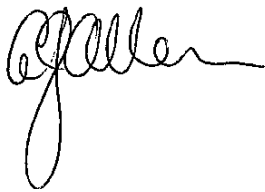
Question 2 from Commissioner David Sheppard

The second question arose from paragraph 19 of our submission, about the renewal of consents upon expiry. We were asked to develop matters to be considered during applications for consent renewal.

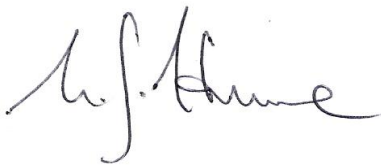
In response, we largely continue to advocate the position stated in our submission and in our statement of evidence to the Group 1 hearing. In principle, new consents to replace existing consents should normally be granted, unless there is a very good reason not to.

Matters to be considered should include:

1. History of compliance (confined to matters which are significant in terms of their environmental impact).
2. Application of, or willingness to apply, an appropriate level of Good Management Practice (determination of an appropriate level of GMP, in any particular situation, will include consideration of economic viability).
3. Equity with other consent holders (for example, a consent holder should not be disadvantaged simply because of the timing of their consent expiry).



Chris Allen
Mid Canterbury President
Federated Farmers of New Zealand



Lionel Hume
Senior Policy Advisor
Federated Farmers of New Zealand