

SUBMISSION

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To: **Environment Canterbury**

By: **Combined Canterbury Provinces,
Federated Farmers of New Zealand**

and

Pareora Irrigators Collective

On the: **Proposed Pareora Catchment Environmental Flow and Water
Allocation Regional Plan**

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1 Introduction

- 1.1 Federated Farmers and the Pareora Irrigators Collective thank Environment Canterbury for the opportunity to submit on the Proposed Pareora Catchment Environmental Flow and Water Allocation Regional Plan.
- 1.2 Federated Farmers of New Zealand is a primary sector organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers
- 1.3 The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:
- Our members may operate their business in a fair and flexible commercial environment;
 - Our members' families and their staff have access to services essential to the needs of the rural community; and
 - Our members adopt responsible management and environmental practices.
- 1.4 The Pareora Irrigators Collective comprises all of the irrigators in the Pareora catchment with surface water consents or hydraulically connected groundwater consents. These are the irrigators who will be subject to the minimum flow conditions in the Proposed Pareora Catchment Environmental Flow and Water Allocation Regional Plan. The collective takes a proactive interest in rural water issues generally and has been actively involved in the formation of the current proposed plan.
- 1.5 This submission was developed in consultation with members of Federated Farmers and members of the Pareora Irrigators Collective. It is important that this submission is not viewed as a single submission, but as a collective one, that represents the opinions and views of members of both Federated Farmers and the Pareora Irrigators Collective.
- 1.6 Federated Farmers and the Pareora Irrigators Collective acknowledge submissions from individual members of Federated Farmers and individual irrigators in the Pareora catchment.

2 Support for the Plan and Key Points

- 2.1 Federated Farmers and the Pareora Irrigators Collective generally support the plan in its current form. The proposed plan, including the proposed minimum flow and allocation regime (Table 1) was developed as the result of a consultative process, based on relevant hydrological, ecological, social, economic and cultural data. Our greatest concerns about the plan are outlined in the specific submissions in Section 3, below.
- 2.2 The development of irrigation and associated infrastructure has large economic¹, community and environmental benefits which have been clearly demonstrated by the Opuha irrigation scheme in South Canterbury². Irrigation from the Opuha dam was estimated (2006 figures) to have increased farm output by \$124,000,000 per year and to have created 480 full-time jobs³. (The author of that report estimates that those figures would have since increased by about 20%.)
- 2.3 Federated Farmers and the Pareora Irrigators Collective support the concept of B block storage. Storage should be encouraged because it provides reliability of supply and the ability to manage water for a range of purposes, including social, economic and environmental purposes. It is vital that the B block minimum flow and the size of the allocation block are such that storage (either community or individual) is a cost-effective option for most irrigators. We are particularly concerned that B block water will be apportioned equitably across land owners within the Pareora catchment.
- 2.4 When the proposed plan becomes operational it is important that consents are reviewed to be consistent with the plan as quickly as possible. This should be done at no cost to consent holders.

3 Specific Submissions

Provision:

Plan Purpose and Scope, paragraph 5, page 1.

Item 4 under key characteristics, page 14.

¹ Ministry of Agriculture and Forestry, 2004: The Economic Value of Irrigation in New Zealand. MAF Technical Paper No: 04/01

² Aoraki Development Trust, 2006: The Opuha Dam: An *ex post* study of its impacts on the provincial economy and community.

³ Aoraki Development Trust, 2006: The Opuha Dam: An *ex post* study of its impacts on the provincial economy and community.

Objective 5, page 14.

Policy 1.19, page 18.

Submission:

There are several statements of the intention to review the plan in 10 years time, and specifically to increase minimum flows at that time. The flow and allocation regime will obviously be a key part of any future review. Federated Farmers and the Pareora Irrigators Collective support the appropriate development of water infrastructure, including storage, and support the philosophy of the Canterbury Water Management Strategy, whereby the development of water infrastructure will take place alongside environmental protection and restoration. We look forward to support, from the diverse groups with interests in water in the Pareora catchment, as the strategy is implemented and, specifically, as infrastructure development takes place which will enable environmental protection and restoration without the loss of reliability to abstractive users.

Decision Sought:

That the statement of intent to increase minimum flows at a 10 year review be replaced with a more balanced statement that Canterbury Water Management Strategy be implemented in the context of the Pareora catchment, particularly the philosophy of parallel development, whereby the development of water infrastructure will take place alongside environmental protection and restoration.

Provision:

Policy 1.6, page 16.

Rule 4.2, page 23.

Submission:

Policy 1.6, as written, states that damming of the mainstem of any waterway in the Pareora catchment is inappropriate, because it would impact on flows and flow variability, and that it would affect the ability of the river to carry freshes, floods and sediment downstream. The first point to make is that water storage enables water to be managed for any desired purpose, so water could be released to ensure flow variability, and flows of particular size at particular times. Secondly, the phrase *Mainstem of any waterway* would need to be defined. As written it could include any storage site, most of which would have water flowing in the bottoms of them at some stage. It should be acknowledged that water storage, appropriately managed, can deliver environmental benefits (e.g. the Opuha Dam in South Canterbury).

We appreciate that in Rule 4.2, the damming of a main-stem is a non-complying rather than a prohibited activity. However, given the economic, social and environmental benefits which can be associated with water storage, discretionary activity status would be more appropriate.

Decision Sought:

That the policy be re-written in a balanced way, acknowledging the benefits of water storage, and that storage, appropriately managed, can deliver environmental benefits.

Amend activity status to discretionary, in recognition of the economic, social and environmental benefits which can be associated with water storage.

Provision:

Policy 1.10, page 17.

Policy 2.3, page 19.

Schedule 2, page 35.

Submission:

Policy 1.10 imposes annual volumes, calculated using Schedule 2. Schedule 2 is based on Environment Canterbury's Schedule WQN9 methodology. This methodology has been shown to be seriously flawed. ECan has accepted the use of an alternative, daily water balance methodology known as 'Irricalc'. This methodology should be the default methodology, or at least offered as an alternative.

For takes to storage, allowance needs to be made for losses associated with the storage process. Federated Farmers and the Pareora Irrigators Collective appreciate the provision for storage and acknowledgement of its benefits, but allowance needs to be made for additional losses when calculating annual volumes.

It is assumed that annual volumes will replace the current weekly or monthly volumes stated on consents. The plan should explicitly state that weekly and monthly volumes will be removed at the time annual volume limits are added to consents. Consents should be amended to be consistent with the operational plan, as soon as possible, at no cost to the consent holder.

Decision Sought:

Replace the methodology underpinning Schedule 2 with the Irricalc methodology, or at least offer Irricalc as an alternative.

For takes to storage, allow for reasonable losses associated with storage processes when calculating annual volumes (assuming high standards of design and construction).

Amend the plan to state explicitly that annual volume limits will replace weekly and monthly volumes, and that the weekly and monthly volume limits will be removed from consents. It should also be stated that consents will be amended to be consistent with the operational plan as quickly as possible, at no cost to the consent holder.

Provision:

Policy 1.13, page 17.

Explanation, page 17.

Submission:

Federated Farmers and the Pareora Irrigators Collective support the policy to not require existing, lawfully established abstractions for frost protection to comply with the environmental flow and allocation regime shown in Table 1. Frost protection is needed at a time of the year when there is little demand for irrigation, it uses relatively little water, and it is crucial for an industry which employs a substantial number of people and makes a large contribution to the economy of the district.

The final sentence under *Explanation* states that, when the plan is reviewed, the minimum flow for frost protection will be re-evaluated. Federated Farmers and the Pareora Irrigators Collective support maintenance of the status quo with regard to frost protection. When the plan is reviewed, all aspects will be looked at. However, we are opposed to specific mention of reviewing the minimum flow for frost protection. Substantial investment has been made in the current frost protection infrastructure and it is not reasonable to put this at undue risk.

Decision Sought:

Retain Policy 1.13 for the reasons given above.

Delete the final sentence under *Explanation* for the reasons given above.

Provision:

Policy 1.15, page 18.

Table 1, page 26.

Submission:

Federated Farmers and the Pareora Irrigators Collective support the concept of B block storage but consider that the minimum flow is set too high in Table 1. For example, it is greater than the flow required to remove periphyton from the river bed. The B block minimum flow must be set so that water storage from this allocation block is a genuine, cost-effective option, consistent with maintaining a healthy river environment.

The size of the B block allocation may be set too low in Table 1 to be a cost-effective option to supply community storage or for irrigators individually. Storage provides reliability of supply and the ability to manage water for a range of purposes, including social, economic and environmental purposes. Therefore, it should be encouraged.

Federated Farmers and the Pareora Irrigators Collective strongly supports the principle that B block takes are apportioned equitably across land owners within the catchment.

Decision Sought:

Reduce the B block minimum flow in Table 1, so that water storage from this allocation block is a genuine, cost-effective option.

Increase the B block allocation limit in Table 1, so that B block storage is a realistic and cost-effective option.

Retain the principle that B block takes are apportioned equitably across land owners within the catchment.

Provision:

Policy 3.1(c), page 19.

Submission:

Policy 3.1(c) states that, when surface water takes are transferred, if the consent was not being fully used prior to transfer, it must be used at the same or a lesser rate after transfer. For a take which has a seasonal volume attached, this policy makes no sense. For a take which meets reasonable use criteria, the full volume should be available for transfer. Also, how would use prior to transfer be estimated, and over what time-span? It is normal for takes to not be fully used in all but the driest years.

Decision Sought:

Delete Policy 3.1(c) because it makes no sense for takes which have a seasonal volume attached and which meet reasonable use criteria.

Provision:

Policy 3.3(c), page 20.

Submission:

Policy 3.3(c) requires a minimum of 80% irrigation application efficiency. 80% irrigation application efficiency is built into schedule WQN9 which sets seasonal limits on the use of water for irrigation. Any irrigator which does not achieve 80% efficiency will automatically be penalized by having to under-irrigate or reduce irrigated area in a dry year. Therefore this policy has no useful purpose. Further, many irrigation systems are currently not capable of 80% irrigation application efficiency. Are such systems to be shut down? Further, the policy would be very difficult to implement. It would not be cost-effective for the regional council to measure the irrigation application efficiency of every consent holder.

Decision Sought:

Delete Policy 3.3(c) because it has no useful purpose, would shut-down many current irrigation systems, and would be very difficult to implement.

Provision:

Policy 3.3(e), page 20.

Submission:

Consistent with previous submissions on NRRP Schedule WQN9 by Federated Farmers, we are opposed to water being allocated on the basis of land use. Farmers need to have the flexibility

to modify land use, for example in response to changes in market or climatic conditions. This is not an environmental issue and neither should it affect efficiency of use.

In addition, the policy may lead to perverse decisions about land use, by encouraging the adoption of particular land uses simply because they attract a greater allocation of water.

Decision Sought:

Delete Policy 3.3(e) because farmers need to have the flexibility to modify land use, for example in response to changes in market or climatic conditions.

Provision:

Policy 3.4, final sentence under *Explanation*, page 21.

Submission:

Existing resource consents will not need to be reviewed because of the new government water measurement regulations. The Resource Management (Measurement and Reporting of Water Takes) Regulations 2010 are an RMA section 360 regulation and, as such, are deemed to be part of existing consents. Review of consents under section 128(1)(b) of the RMA is only necessary if council wants to introduce conditions that are more stringent than the regulations.

Decision Sought:

Amend the final sentence under *Explanation* to clarify that review of consents under section 128(1)(b) of the RMA is only necessary if council wants to introduce conditions that are more stringent than the government's new water measurement regulations.

Provision:

Policy 3.7, page 21.

Explanation, page 21.

Submission:

Policy 3.7 states the intention to reprioritize consents based on the first and second order priorities stated in a section of the Canterbury Water Management Strategy (CWMS) entitled *Achieving the vision*. The *Explanation* section of this proposed plan expands by listing the first and second order priorities. If the purpose of this policy is to promote implementation of the CWMS then it should refer to its vision statement and the list of features following that statement, which will indicate the success of the strategy. These features include: water users having access to reliable water; increasing primary production and employment; increasing net value-added by irrigation; and improving rural community viability; along with other environmental, social, cultural and economic features. Regard must also be had for the CWMS targets (listed under *Achieving the vision*), which include such matters as irrigated land area, and regional and national economic growth.

Decision Sought:

Amend Policy 3.7 to encompass the vision and principles of the CWMS in their entirety, as outlined above.

Provision:

Rule 5.1(c), page 24.

Submission:

The time allowed for taking water for bore development or pumping tests must be sufficient to ensure that draw-downs stabilize and to observe any delayed leakage.

Decision Sought:

Amend Rule 5.1(c), if necessary, to allow sufficient time to ensure that draw-downs stabilize and to observe any delayed leakage.

CONCLUSION

The Combined Canterbury Provinces of Federated Farmers and the Pareora Irrigators Collective thank Environment Canterbury for the opportunity to submit on the Proposed Pareora Catchment Environmental Flow and Water Allocation Regional Plan. We are committed to the sustainable management of the region's natural resources and look forward to continuing to work constructively with council in the future.

Federated Farmers and the Pareora Irrigators Collective wish to be heard in support of their submission.



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