PLAN-WAIP-IP-6

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Sent: Monday, 14 June 2010 10:18 p.m.
To: mailroom@ecan
Subject: TRIM: Waipara Flow & Allocation Plan Submission
Attachments: INZ Submission Waipara Plan.docx
TRIM Record Number: C10C/79690

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IRRIGATION
NEW ZEALAND INC

SUBMISSION ON PROPOSED WAIPARA CATCHMENT ENVIRONMENTAL FLOW AND WATER ALLOCATION REGIONAL PLAN

Date	14/06/10
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Irrigation New Zealand Incorporated wishes to be heard in support of its submission. However, if others make a similar submission we will consider a joint presentation.

(Andrew Curtis, Chief Executive Irrigation New Zealand Incorporated)

Overview

1. INZ (Irrigation New Zealand Incorporated) is a national body that promotes excellence in irrigation development and efficient water management throughout NZ (New Zealand), based on the principles of responsible and sustainable management of water resources. INZ is a national organisation that represents the interests of 3,600 members, totaling over 350,000ha of irrigation (approximately 50% of NZ's irrigated area) and all the key irrigation service providers (trade, researchers and consultants).

General Submission:

2. INZ has reviewed the proposed Waipara Catchment Environmental Flow and Water Allocation Regional Plan and generally supports the plan. However, some specific submission points are contained below.

3. Efficient and effective irrigated agriculture is essential in the future development of a sustainable and prosperous Canterbury region. However, to ensure irrigators can achieve this it is paramount that policy makers

understand both the drivers and system linkages that enable efficient and effective irrigation and implement policies that empower these.

4. Reliability of water supply is the key driver to ensure efficient and effective irrigation in Canterbury. As reliability increases, so does both the level of infrastructure investment (upgrade) and the quality of irrigation management. In summary, reliability minimises risk (gives users certainty) which allows greater investment and a move from 'just in case' to 'just in time' irrigation decision making. This in turn has flow-on positive effects for both the environment (less water used to achieve the same outcomes and an overall reduction in losses from the system – leaching and run-off) and community resilience (greater crop diversity and crop production security which leads to an increased added value component). It is therefore paramount for all stakeholders that reliability is promoted.

5. The implementation of Audited Self Management (ASM) is the key mechanism for achieving the adaptive management outcomes such as suggested in Policy 3.5 - Partial Restrictions. ASM is a term used to describe a process whereby certain responsibilities of regional authorities under the RMA are delegated to water users under agreed terms (self management) and subject to an audit of processes and outcomes by the regional authority. ASM is an ever evolving management system, a moving point along a continuum, with individual regulatory based management being at one end of the spectrum (the status quo) and community based adaptive management being at the other. The irrigation industry has embraced the ASM concept and its potential and is currently embarking onto the continuum in many parts of Canterbury.

6. There are five key attributes to a successful ASM system –
    a. Data used for system management and decision making is robust - ensuring wider community confidence is gained and maintained
    b. Data and derived information must be accessible by all stakeholders at the appropriate level
    c. An open and regular communication process must be maintained between those responsible for management and those affected by the resulting decisions

d. The governance arrangements must reflect democratic values and be protected from capture by interest groups
e. The roles and responsibilities of all entities within the ASM system must be clearly defined and agreed at the outset. Particularly the responsibilities of the entities with delegated or core statutory responsibilities for consent(s)

7. ASM and the adaptive management framework it offers will ultimately deliver far better outcomes for all stakeholders than any plan policy or rule ever will. It is therefore important that weight is given to the ASM approach in the Waipara Catchment Environmental Flow and Water Allocation Regional Plan. Decision making needs to be enabling to ensure its successful future implementation

Specific Submissions -

Policy 1.8 Submission:

8. In NZ's extremely variable maritime climate, characterised by annual and decadel climatic patterns, short term records of water use do not provide a reliable indication of actual need. The amount of water allocated to irrigators must be based on long term climate data and needs to provide a minimum of 1 in 10 year reliability.

Decision Sought:

9. Amend Policy 1.8 so that allocation reflects need / reasonable use as calculated by the Irricalc or other suitable model based upon a water balance methodology.

Policy 1.10 (b) & Rule 2.2, parts (c)(i)(b) and (c)(ii)(b) Submission:

10. Table 1 specifies increased minimum flows for run-of river irrigation takes converted to a take to storage. INZ is opposed to increasing the minimum flows for this activity. Water storage needs to be actively encouraged as it enables more effective and efficient use of the Waipara catchments limited water resources - enabling a shift in irrigation management philosophy from 'just in case' to 'just in time', alongside the adoption of more efficient irrigation technologies.

Decision Sought:

11. Delete part (b) of Policy 1.10 and Rule 2.2 parts (c)(i)(b) and (c)(ii)(b)

Policy 3.5 Submission:

12. The concept and complexities of partial restrictions are better dealt with through the implementation of a catchment based Audited Self Management program. Rules and policies laid out in flow and allocation plans are unable to deal with the subtleties of existing irrigation systems, particularly their operational requirements, and will likely result in perverse outcomes. For example, as Waipara is a winegrowing area, many takes are likely to be 'oversized' for irrigation as they are designed for one-off frost protection events.

Decision Sought:

13. Delete Policy 3.5

Policy 3.8 Submission:

14. INZ strongly holds the view that consents to take water should be issued for 35 years whenever possible. For efficient and effective irrigation considerable investment is required in both on-farm and off-farm infrastructure. Shorter consent durations will discourage investment and therefore provide a barrier to efficient and effective irrigation.

15. The Proposed Natural Resources Regional Plan already contains general guidelines on resource consent duration, in Section 1.3.5. The nature of these guidelines is consistent with those proposed as example guidelines in the Ministry for the Environment publication *Resource Consent Durations and Reviews.* These existing guidelines correctly include matters such as *the costs and benefits of the activity to the community*, and *the consent holder's capital investment in a pre existing activity*. Irrigation NZ submits that the existing Section 1.3.5 of the plan is satisfactory and that the proposed Policy 3.8 in this plan is not necessary and may well be counter-productive.

Decision Sought:

16. Delete Policy 3.8

INZ *Submission Ends*