

Tabled @ Hearing
16-07-2015.



HEARING EVIDENCE: Variation 2 Canterbury Land and Water Regional Plan

Date: 16/07/2015
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A handwritten signature in black ink, appearing to read "Andrew Curtis".

(Andrew Curtis, CEO IrrigationNZ)

OVERVIEW of INZ

- IrrigationNZ (INZ) is a national body that promotes excellence in irrigation.
- INZ represents the interests of over 3,600 irrigators (irrigation schemes and individual irrigators) totaling over 350,000ha of irrigation (approximately 60% of NZ's irrigated area).
- INZ also represents the interests of the majority of irrigation service providers (over 150 researchers, suppliers, designers, installers and consultants).
- INZ has a strong membership base in the Hinds zone with widespread support from both individual irrigators and Irrigation Schemes.

Nutrient Management

Nitrate Management Policies & Rules

- A primary sector grouping has worked together to come up with a 'fairer' way of distributing the nitrate reductions (the pain) within the Hinds Catchment
- The outcome is reflected in the DairyNZ evidence and is similar in nature to that of Variation 1
- It is particularly important that a 'Flexicap' is put in place for low nitrate loss land uses to give them a degree of flexibility, rather than simply grandfathering everyone to their N Baseline

Catchment Load Calculation

- Careful consideration needs to be given to the use of a methodology as opposed to an actual number in the plan. INZ states this given the on-going variable nature of the farm nutrient loss model (OVERSEER) used to derive the load and noting the changes are not linear in their nature.

Schedule 24 Farm Practices

- The code of Practice for Irrigation System Performance Assessment has now been revised and contains pre-season checks and annual calibration methods. We therefore suggest b(ii) is updated accordingly

(b) (ii) The irrigation system application depth and uniformity are self-checked annually in accordance with the Irrigation New Zealand Piped Irrigation System Performance Assessment Code of Practice [2015] <http://irrigationnz.co.nz/industry/performance-assessment/>

TSA, MAR and Transfer

- TSA & MAR are both essential if the water quality targets for the Hinds catchment are to be achieved
- For the on-going development of catchment scale mitigations there is a high probability they will require the transfer of existing groundwater takes to be used for TSA and/or MAR. The use of deep groundwater in the Lower Plain for stream augmentation and irrigation purposes, as is already undertaken by the Eiffleton Irrigation Scheme, for example.
- INZ therefore have significant concerns with transfer having a prohibited activity status (surface water and Valetta groundwater zone) within the plan and ask the question whether this may foreclose such a solution?
- An option to resolve this would be to exclude transfers for this purpose from the prohibited rules.

Note this concern obviously depends on ones interpretation of rule 13.5.35 in relation to rules 13.5.33 and 13.5.34