

## Make Submission

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<b>Submission by</b>	IrrigationNZ ( Andrew Curtis - 77656)
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<b>Whole Plan Support/Oppose</b>	

**Please select one of the following:** I generally agree with the activity proposed for the Long-Term Plan.

### Whole Plan Comments

**Please provide any comments.**

IrrigationNZ (INZ) wishes to be heard in support of its submission.

#### OVERVIEW

- 1 INZ is a national body that promotes excellence in irrigation. INZ represents the interests of over 3,600 irrigators nationally (irrigation schemes and individual irrigators) totalling over 400,000 ha of irrigation (+50% of NZ's irrigated area). It also represents the interests of the majority of irrigation service providers (over 120 manufacturers, distributors, design and install companies and consultancies).
- 2 Over the past 10-years INZ has developed a constructive working relationship with Environment Canterbury, and we would like this to continue to grow. INZ's prime focus in the Canterbury region is partnering with Environment Canterbury to achieve the environmental and economic targets of the Canterbury Water Management Strategy (CWMS). In doing this we actively encourage the uptake of irrigation best practice by irrigators, irrigation schemes and the irrigation service industry. Improving irrigation practice is key to the success of the CWMS as it will reduce water take abstraction and nutrient losses whilst improve productivity and profitability.

- 3 The majority of INZ's activities are focused around the provision of standards, knowledge and training opportunities for the achievement of Irrigation Best Practice. The 2017-18 season has been a record year for training with over 750 irrigators attending workshops and training days. We have also run a very successful 'Summer Bucket Test' programme for a second season.

#### **SUBMISSION SUMMARY**

- 1 Support additional resources being allocated to analyse and report aggregated FEP audit data
- 2 Support the resourcing of two additional cultural land management advisors
- 3 Support the CWMS move to a general rate
- 4 Qualified support for the use of consent review processes
- 5 Request greater resourcing is provided for the provision of aggregated water meter data
- 6 Request greater resourcing is targeted at resolving future fish screening issues

#### **SUBMISSION**

##### **Farm Environment Plan Reporting**

- 1 INZ agrees with the priority of allocating adequate resourcing to analyse and report upon aggregated Farm Environment Plan audit data at the catchment/ zone level. We support additional resources being allocated to do this significant task.
- 2 A recent INZ survey showed a priority for our irrigator members is to be effectively communicating to the community what they are doing on their properties to improve water quality. We are planning to work with Environment Canterbury on a specific project around improving public access to information on the actions irrigators are now taking on farm to improve water quality. We would also welcome any future opportunities to work together to achieve this objective.

##### **Supporting Farmers with Farm Environment Plans**

- 1 In terms of how Environment Canterbury works with farmers to improve environmental outcomes INZ would like to see Environment Canterbury focusing on areas where it has a specialist expertise (biodiversity) or can help better enable the availability of specialist expertise (cultural advice). We therefore support the cultural land management advisor initiative.
- 2 We do not support Environment Canterbury engaging land management advisors for general farm advice. This is a double-up of resources as the primary sector and consultants have a specialist skill set around this and are best placed to deliver it.

##### **Water Meter Data Reporting**

- 1 Since the introduction of the Water Measurement and Reporting Regulations in 2010 there has been a significant amount of irrigation water use data collected. Despite installing water meters and providing data coming at a significant cost to irrigators, there has been minimal reporting back to irrigators and more importantly to the wider community on this.
- 2 The wider public need access to aggregated water meter data in order to better understand how water is being used and managed in Canterbury. Including the trends over time. INZ believes there is an urgent need to provide this data to ensure the discussion about water use be informed by facts. Environment Canterbury needs to better consider in its 2018-28 LTP how this will be achieved.

##### **Consent Reviews**

- 1 INZ notes there is reference to the use of the consent review mechanism to more quickly align consents to new provisions and rules. The Ashburton River/ Hakatere catchment is mentioned as a suitable candidate for this.
- 2 The uncertainty created by past consent reviews, the Rakaia-Selwyn for example, has resulted in modernisation of irrigation systems and implementation of new technologies to improve irrigation efficiency being halted for a number of years whilst the review occurred. This is not a desirable outcome. Any decision to undertake a consent review needs to carefully weigh up all the costs and benefits before proceeding.
- 3 If consent reviews are undertaken, investing time upfront prior to the review process to reach agreement around the outcomes and objectives sought is critical to reducing later disagreements and litigation. This approach will help the review process be completed in a timely manner.

### **Fish Screens**

- 1 INZ requests that greater resourcing be allocated through the 2018-2028 LTP to helping resolve the challenging issue of fish screen monitoring and compliance. In addition, there needs to be resourcing directed into improved technical understanding alongside investigating collective approaches to intakes for some rivers.
- 2 As consents come up for renewal they will be subject to the fish screen design criteria contained in Schedule 2 of the Land and Water Regional Plan. INZ foresees significant issues around consenting and construction of bypass flows and structures unless a more proactive approach is undertaken to these.

### **General Rate**

- 1 INZ supports the proposal to move the CWMS funding from a targeted to a general rate. The success of the CWMS is vital for the continued well-being of Canterbury region, including Christchurch.