

## Key points for Hearing – AMWG

Tena Koutou Commissioners

Thank you for the opportunity to talk to my evidence for the Adaptive Management Working Group.

My evidence provides the background to the AMWG's submission and a number of the changes the Group has sought to PC7. It also addresses various matters arising from the Section 42A report, including the Reporting Officers' various responses to those changes.

Compliance complexity is a common criticism of the AMWGs requests. I would like to highlight some of the points addressed in my evidence in respect to that position.

Firstly, the AMWG members have all been involved with OEFRAG, and the process of assessing the information available to inform recommendations for WSD to ECan. As explained in the evidence of the AMWG members, the Groups proposed alternative regime for saleyards bridge was developed with a complete understanding of the compliance complexities and an acceptance that this is part of freshwater management in an augmented river system, as it has been for some time. They also do this with the knowledge that ECan has been able to successfully monitor consents during periods when Water Shortage Directions have been imposed very quickly due to changing conditions in the Opihi catchment, without the benefit of a compliance system specifically developed to accommodate such restrictions.

It is important to acknowledge that there is only one consent holder that augments the Opihi River catchment, and there is only a very small number of stakeholders that would be involved in the implementation of the AMWG regime if it is accepted. As such this is not a situation where ECan will have to set up and tailor the compliance monitoring system to multiple parties.

Opuha Water sought to engage with the ECan compliance monitoring team through the PC7 process to fully understand their concerns and accommodate them. However, we were unable to make any traction in understanding the real issues because PC7 was already 'in process'. I have full confidence that if we can sit down with local Timaru-based ECan consent and compliance teams who understand us and our operations, that the development of a suitable compliance monitoring system that meets everyone's needs, is achievable.

Opuha Water already monitors the range of environmental factors that the AMWG regime triggers rely on and either provides this data to ECan or makes it publicly available. We are not starting from scratch with the information required to implement the regime.

ECan currently undertake compliance monitoring retrospectively, for example, sometimes 4-6 months after an irrigation season. Conversely, the AMWG regime provides regular 'touch points' during a water shortage event that will provide for far more proactive monitoring than is currently occurring. This will enable non-compliances to be identified in 'real time' and actions to be taken immediately.

Opuha Water has no wish to compromise its compliance record or the compliance of those affiliated to the scheme. It would simply not be prudent for us to propose a monitoring regime and compliance system that fundamentally will not work. Given the cost of any complexity will be borne by Opuha Water, and in turn those affiliated to us, it is in our best interest to ensure what is implemented is practical, fit for purpose, and achievable.

Finally, I reiterate Mr Mockford's comments that the AMWG regime has been developed to manage water short periods. The restrictions are an exception regime to manage abnormal situations, they are not intended to be implemented every irrigation season.

I am of a firm view that the compliance complexities highlighted in the s42A report are overstated, and that the AMWG have provided solutions, for example the concept of an operational management plan, to demonstrate that the groups recommendations are completely achievable.

I thank you for your time, and welcome any questions you may have.