

Key points for Hearing – OWL

Tena Koutou Commissioners

My name is Julia Crossman and I am the Environmental Manager at Opuha Water Ltd. I have been involved in the Plan Change 7 process since the initial public meetings held by ECan and the OTOP Zone Committee back in 2016. Given PC7 replaces the ORRP under which all Opuha Waters water consents and all affiliated water consents have been granted, we have endeavoured to meaningfully engage with ECan and the OTOP Zone Committee over the last 4 years with the aim of building their understanding of both the Opihi catchment and operation of the Opuha scheme.

Opuha Water takes its environmental obligations very seriously. When I started with Opuha Water back in 2014, I understand I was the first Environmental Manager appointed by an Irrigation Scheme in Canterbury. Every year we undertake extensive environmental monitoring in order to meet our consent requirements, we also invest heavily in further research and studies to better understand the environment within which we operate, and our influence on that environment. We have commenced further monitoring to inform our response to PC7 and the response of the working parties Opuha Water has been a member of or supported. This monitoring is unlikely to stop, it will endure long term because it is providing us with critical information we need in order to manage our activities in the most responsible way.

Our environmental stewardship extends to a farm scale through our audited Farm Environment Plan programme, which was, again, one of the first to commence in Canterbury. I have observed a marked difference in term of shareholder engagement in the environmental space and the desire to be operating at, if not beyond, good management practice, compared to when I first started at Opuha Water. Our farmers strive for an A audit grade. This is because Opuha Water, as a co-op, has provided its shareholders with the tools and resources they require to understand irrigation management and GMP and make better choices on farm. Opuha Water can only provide this service due to its scale and the whole system approach it takes to water management.

In addition to explaining the current consenting framework that the Opuha Dam, the Opuha Scheme and those affiliated to the Scheme work within, my evidence has focussed on the critical areas of the PC7 framework that need modification to ensure current scheme arrangements are recognised for and opportunities for scheme infrastructure solutions are not eroded. As currently drafted, PC7 severely limits Opuha Water's ability to adapt and respond to an evolving freshwater management framework and climate change challenges.

In summary, there are five areas that Opuha Water is particularly concerned about, and which it seeks changes in relation to:

- Firstly Opuha Water are concerned about the proposals to restrict scheme affiliation to 'shares', which is inconsistent with ECans historical consenting approach and would compromise the reliability of a number of current Opuha shareholders and water users.
- We believe there is also a lack of clarity and consistency regarding the exemption of affiliated permits from the conditions of certain PC7 rules, including with respect to the OTOP Zone Committee's recommendations.
- We are also concerned about the limitations PC7 places on future opportunities and alternatives for those affiliated to the Opuha Scheme, in particular by precluding the transfer of takes from the tributaries to the mainstem or Lake Opuha. This essentially closes the door to any future infrastructure solutions to reducing allocation on the Opihi tributaries, despite there being no basis to the perceived risk of overallocation of the main stem due to augmentation.
- Finally, Opuha Water believe that there are significant efficiencies and benefits to be found through the globalisation of affiliated consents, so long as this can occur on a sub-scheme in addition to scheme-wide basis as proposed by PC7. However, the limitations in the rate of take that PC7 places on the transfer of permits to a Principal Water Supplier, will only act to disincentivise Opuha Water from applying for such a consent.

The amendments sought do not allow Opuha Water to 'game' the system, nor do they have negative environmental impacts. Conversely, they are intended to drive further efficiencies across the scheme whilst also providing for significant environmental benefits, and include additional safeguards not included in PC7 as notified.

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