



CENTRAL OTAGO WINEGROWERS ASSOCIATION (INC.)
Incorporating Central Otago Pinot Noir Ltd

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ORC plan Change 7:
COWA (Central Otago Winegrowers Association) Submission
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To: Otago Regional Council
policy@orc.govt.nz

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A. Introduction.

COWA strongly opposes the plan change 7.

COWA represents 105 members, across 2000 hectares of land, with over 170 wine brands. It is estimated that the contribution to the Central Otago economy is in the hundreds of millions of dollars, employing thousands of staff across the membership and across those firms that provide the members services. While the scale of our impact is large, most of members are small, family owned businesses.

This submission outlines the reason that COWA opposes the proposed changes.

COWA also requests that it be invited to submit in person at any hearings that are held.

In addition, given the severe impacts of COVID-driven policies and market impacts on the COWA membership, COWA also requests a 12 month delay in proceedings, so that members can generate the

resources required to fully work through all the issues and impacts that they face - which they are generally not in a position to do presently.

B. Reasons that COWA opposes the plan change 7

1. The Plan does not recognise specific catchment characters.

The national policy statement on freshwater states that water allocation should be approached on a catchment by catchment basis. Each catchment in Otago is unique and a blanket policy fails to take into consideration these unique characters. With multiple rivers, ecosystems, surrounding flora and fauna, and other factors, to apply a blanket approach is to ensure suboptimal outcomes as few of our areas are 'average' in character.

2. The plan does not recognise recent water use

By only looking at average data from 2012 to 2017 irrigation seasons, the plan change fails to recognise the most recent irrigation seasons. Those who have undertaken development in the previous two seasons (2018/19 and 2019/20) will not have this investment recognised. Much of this investment is into newer technologies that have much greater water use efficiency.

With digital recording of the most recent data there should be no hindrance to including this data in the application to granting new water permits.

By choosing to ignore the most recent data, the plan is effectively, by choice of data set choosing to reduce the effective amount of water from the present levels. It would be more transparent, and also a better measure, to use present measures and, if reduction is required, to justify that reduction.

3. The plan will grandfather benefits to those who may have mismanaged water

By solely looking at water volume through a metering device, it fails to recognise what that water was used for. Those that were judicious and only took what was required at the time may now be disadvantaged by those who took advantage of using over allocated volumes of water.

4. The plan ignores crop type and end water use

The water use allocated to a property should be based on what the needs are for the crop grown balanced with the environmental requirements of the catchment.

This broad brush approach does not show any relationship to the environmental impact of the different crops and farming methods, used by the different water users. This is a shift in the 'goal posts' of what many water user groups were working towards

5. The plan reverses previous communications.

The plan change 7 proposal disregards the work that has been completed to date by water users in working towards renewal of deemed permits -The council had asked up until recently for catchment groups to work together to gather the data on their respective catchments— hydrology, water use type and fish studies, this work is now irrelevant to the process of plan change 7 and is viewed as a waste of time, energy and money by those involved

6. The plan is too short in nature

The investment in vineyards is a long-term investment, with little or no short term payoffs. Vines have a useful life of 30 years+. Specifically many viticulture investments look well beyond 6 years. Vines do not crop for the first 3 seasons and generally are considered to reach a peak in quality production around 15-20yrs of age. Not having security of water over a longer term will disadvantage many vineyard operations.

7. The plan creates greater uncertainty for businesses and will stifle investment, growth and jobs.

The short-term nature of consents and the disregard for recent developments will create anxiety and stress amongst many water users who are unable to plan for long term investments.

A system of continually changing short term regulatory conditions is out of cadence with the nature of viticulture - which is one of the major agricultural concerns, and draw cards for workers and tourists alike - in the area. To make effective business decisions, long-term certainty is required. Unless this is there, it will stifle investment

C. Request to delay

Given the COVID-driven impacts, and regulatory restrictions on many of our members' businesses, as well as financial pressures, we request a 12 month delay to the process.

D. Request to appear in person

COWA requests to appear in person at any hearings held.

Sincerely,

The Board of COWA