

[Redacted]

From: Otago Regional Council <notifications@engagementhq.com>
Sent: Wednesday, 29 April 2020 8:13 pm
To: [Redacted]
Subject: Anonymous User completed Submission Form – Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water

Anonymous User just submitted the survey 'Submission Form – Proposed Water Permits Plan Change (Plan Change 7) to the Regional Plan: Water' with the responses below.

Full name of submitter

Amanda Williams

Name of organisation (if applicable)

Excel Farming Ltd

Email

[Redacted]

Postal Address (or alternative method of contact)

[Redacted]

Phone number

[Redacted]

Do you wish to be heard in support of your submission?

(Being 'heard' means speaking at a hearing)

No

Could you gain an advantage in trade competition from this submission?

No

Are you directly affected by an effect of the plan change that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition

I am

State what your submission relates to and if you support, oppose, or want it amended:

(e.g. support rule 'x', or amend policy 'y')

We disagree with this Entire Plan change and want it declined

State what decision you want the Otago Regional Council to make:

(e.g. amend policy 'y' to say....)

Want Entire Plan Change 7 declined

Give reasons for the decision you want made:

(e.g. I want policy 'y' changed because...)

There are many reasons why this should be declined. 1. The process to get to this point has been messy, long, biased and has not considered all aspects of our community- the social or economical impact of this Plan change has not been researched. Without completing this initial process thoroughly considering all possible impacts, to all areas of the community - social, economic, environmental, urban and rural ORC are unable to make an informed plan - this unfairly penalises water users and the environment. Putting in place this plan change for short term is a joke- ORC have been discussing with community and farmers, repeating meetings, going round in circles about values, proposed minimum flows and science that has been shown to be incorrect for over 3 years- if ORC had done this process efficiently and effectively we would have a long term workable solution in place that would be balanced and fair to community, environment and users. 2. In our local community of Omakau/Manuherikia catchment irrigators have been working together to replace their permits as a group, they have considered the environment, completed scientific research, field days and assessing water use. These large and thorough applications are almost ready and now we are being penalised by being made to apply for short term permits only which also reduces the amount of water used off farmers. Applying as a group is what ORC has previously recommended and a lot of time, money and resources have gone into this process so far and this will give a balance between environment and water use - these investments should have not be lost through a short term permit process. 3. six year permits are not long enough for farmers and users to work with - these do not give us stability to make business decisions on, the banks will be reluctant to support businesses with only 6 yr water permits and this generally puts all our farming businesses and those businesses in our community based on farming at risk - how can we invest if we dont know whats happening in 6 yrs time? 4. Water data methodology is a concern - basing allocation of water on the years 2012 - 2017 is concerning. ORC have advised that their data for this time is poor, there were water restrictions to irrigation users over this time due to drought- this is penalising users as they would have used more water if there were no restrictions. If ORC have advised us their data is poor over these times how are they going to do these calculations?? 5 Area Irrigated - can not be more than what was irrigated in 2017/2018. Why is the area irrigated being restricted, what is the advantage of this? if we use the same amount of water on a larger area surely the environmental impacts are reduced? or at least negligible - most farmers will use the water where it is most needed. For us this depends on the season, when it rains, what we are growing - some years we may use our water in one area of the farm predominately but if we are resowing and it is dry we may choose to move the hard hose gun and irrigate a new grass/crop to get it started. Also for us we bought one part of our farm in September 2018 - so the area we could irrigate going forward would be what past owners did? If we choose to irrigate a larger area of land with less water surely this is not a problem -ORC should focus on whats important and let farmers manage the finer points on farm. 6. As farmers we want long term permits with fair and balanced environmental conditions - we know there will be conditions but lets do this once and do it properly. Farmers want a solid minimum flow process that includes allocation and complies with the national policy of Freshwater Management. ORC announced minimum flow options to us 3 years ago and we are still waiting - they had not done science, economic or social work needed... The Lindis group have 35yr permits under the current plan after going to the environment court.