

[Redacted]

From: Otago Regional Council <notifications@engagementhq.com>
Sent: Sunday, 3 May 2020 6:47 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

Andrew Ritchie

Name of organisation (if applicable)

N/A

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 not

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

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

I am a Rural bank manager, having many clients both ex and current, that are negatively impacted by PC7. I do not support this approach. The ORC has signalled for many years what will be required to renew/extend existing deemed permits. This largely revolved around water usage monitoring and upgrading on farm irrigation to a more efficient system. There appears to have been very little industry consultation on PC7. It is my observation the last-minute change of plan is causing stress and uncertainty, especially for those who have invested significant capital into their businesses, often debt funded, to upgrade their irrigation. My ex and current clients have been working in good faith on the message strongly signalled by the ORC that an upgrade in irrigation efficiency would be required to extend/renew existing deemed permits. I have funded multiple irrigation developments to ensure reasonable renewal/extension of water permits, and therefore allow these typically small to medium sized businesses to maintain long term viability through the key ingredient to their business, water. A six-year renewal is not be considered reasonable for obtaining finance approval to fund irrigation development given the level of investment required. An analysis via a feed budget, of additional dry matter grown as a result of irrigation often resulted in gross farm incomes reducing between 15%-30% without water. Simply too much for many of these businesses to withstand long term, and a key driver in obtaining funding for irrigation upgrades to ensure water remained part of their business long term. Additionally, clients who have not yet upgraded their on-farm irrigation have incurred significant costs engaging consultants to help with applications for consent, on farm water monitoring as requested by ORC and early stage irrigation proposals. PC7 now puts them in a very difficult position. Obtaining finance to upgrade their irrigation to standards indicated by ORC is extremely challenging with this level of uncertainty. However failure to upgrade will likely see their permits expire and significantly compromise their long-term viability. They simply can't afford to continue investing in upgrading their irrigation without a greater level of confidence that their applications will be consented. Furthermore, I'm not aware of any evidence that suggests the current irrigation systems are causing environmental damage. Upgrading to a more efficient irrigation system strengthens the environmental stewardship of these farmers. Funding applications to date have ensured small portions of individual farms are irrigated, as insurance against frequent dry/drought conditions. I have yet to fund an irrigation development that has resulted in a change of land use to more intensive farming.

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

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

I want the ORC to scrap PC7 and return to assessing individual or group resource water consents on merit, in a time frame that is more in line with the resources they have available, at very least take option C to allow some longer term certainty for our primary producers. The consultants are doing an excellent job providing the ORC with all the information they require to make reasonable decisions regarding renewal/extension of water permits. If the ORC is unable to achieve this, then outsource the consenting process to expert consultants who can.

Give reasons for the decision you want made:

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

I want PC7 scrapped because it actively works against an economic recovery from COVID 19. Our region stands to be one of the heaviest impacted by the economic fallout from COVID 19. We will need to rely on our primary producers now more so than ever to withstand the economic hardship that lies ahead. What is the role of a regional council if its putting policies in place that actively work against an economic recovery? I want PC7 scrapped because it's not protecting the environment. Most farmers impacted by PC7 are not intensive farmers, their irrigation serves as an insurance policy against a variable climate. The irrigation areas are relatively small in proportion to total land area. They have been producing environmentally sustainable produce for generations. We are not talking about wholesale intensification. I want PC7 scrapped so the significant investment of clients and banks in upgrading their irrigation doesn't become a bad investment. Rather a generational investment to ensure ongoing financial viability. I want

PC7 scrapped so that we have one less contributing factor to a rapidly declining state of mental health among our farmers.