

Submission on Proposed Plan Change 7 [Water Permits] to the Regional Plan: Water for Otago.
[Form 5, Clause 6 of the first schedule, Resource Management Act 1991]

Form 5: Submission on publicly notified proposal for policy statement or plan. [Clause 6 of first schedule, Resource Management Act 1991]

To: Otago Regional Council policy@orc.govt.nz

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I wish to be heard in support of my submission.

If others made a similar submission, I will consider presenting a joint case with them at a hearing.

This is a submission on the following proposed plan change: Proposed Water Permits Plan Change [Plan Change 7] to the Regional Plan: Water for Otago.

I could NOT gain an advantage in trade competition through this submission.

I AM 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.

This submission is in support of "Otago Water Resource Users Group" [OWRUG] submission and "Omakau Area Irrigation Company" [OAIC] submission.

Signature of submitter:  Date 3/5/2020

My submission relates to PC7 in its entirety.

I oppose PC7 in its entirety for the same reasons listed in the Otago Water Resource Users Group "OWRUG" submission and Omakau Area Irrigation Company "OAIC" submission.

I am Craig Webster director of Satinburn and Wildon dairy farms at Omakau, Central Otago. We farm with reasonably large-scale milking 1,600 cows and running 450 associated replacement young stock. We employ a total of 10 staff to manage and run these farms. These staff contribute to the community and schools and the farms use local services and suppliers like earthmoving, drainage, spraying, trucking, fertilizer spreading, silage and hay, stock cartage, seed drilling, cultivation, irrigation, milking plant, effluent and fencing contractors also vets, AB technicians, stock agents, consultants, local garage, Engineers, builders, LIC technology service people and more all invoice us and contribute to the local and wider community. We are considered by Central Government to be

an essential service and we carried on operating during the Covid-19 level 4 lockdown. ORC appear to have failed to take into consideration the economic and social cost associated with PC7.

In 2014 we bought several parcels of land in the Omakau district to put together two dairy farms and a support block. We converted these properties from "wild flood" and "border dyke" irrigation to predominantly centre pivot variable rate spray irrigation to get most efficient and best use of water from our irrigation. This form of irrigation was pushed by ORC as best use of water and environmentally appropriate. PC7 feels like we will be penalised for using water in this way. We source our irrigation water from the Omakau Irrigation Scheme and two private rights that have been renewed as they expired earlier than 2021. We have some large on farm storage dams which help to extend our irrigation in times of restrictions where we work in with the scheme in times of low flow to incrementally reduce abstraction ensuring enough water to go around for irrigation and for the environment. While we are not required to meet a minimum flow beyond the one set at Ophir we voluntarily do so at Campground through careful management of the river. To make this change to spray irrigation we have made a major investment amounting to several million dollars with the VRI [variable rate] portion amounting to \$500,000. For best use of the VRI we carried out electro-magnetic soil and contour mapping at considerable cost. With this information we have the ability to apply water at the most efficient rates to various different soils and contours. This means water doesn't filter right through the soil profile or run off steeper contour and accumulate in gullies and/or flow into neighbours. This is best use of water and creates water savings that can be stored in dams and used in future very dry times and/or used to irrigate an extended area. If PC7 is put into action I think with hind sight I would have been better to stick with the wild flooding and border dyke irrigation and saved the money invested in the modern spray irrigation systems we have and we would not have developed to the same extent that we have resulting in less staff, less production, less work, less taxes and less money going round in the local and wider communities. We are now using water in a more efficient and environmentally friendly way but risk being penalised for that. Once again, I think that ORC have failed to assess the economic and social cost associated with PC7.

Six-year consents.

Farming is a long-term game. Decisions we make now on breeding policies for our herds, pasture species, soil health and fertility see compounding improvements way into the future which is for the good of our children, grandchildren, the community and country. We plan to manage our farms and water for future generations but the security of water, our life blood is only assured in six-year increments. This is unworkable and not bankable. Six-year consents create uncertainty around the future availability of the water resource which in turn will devalue our assets and future enhancing and development opportunities due to lack of funding will be severely suppressed. This all hinders the ongoing best use of our water resource. There will be further best use developments in future due to improved technology which will flow on to being best for the environment and our businesses, the community and the economy. To take advantage of these we need introduced capital and with the insecure six-year consent this will be very difficult to obtain. Under this scenario we risk not being able to improve our water usage which in turn improves positive outcomes on the environment, production and job opportunities and all the positives that creates.

The irrigated area is restricted to the area irrigated in the 17/18 season. Future technology will see the better and more efficient use of irrigation water which should mean water can go further and cover an increased area. Why restrict that if it is better in every way? This is taking away that future opportunity. Who would have thought 50 years ago that we would now have centre pivot spray irrigation with its technology making much better and more environmentally friendly use of water? Would we have wanted to stop that and be stuck with wild flood? To be able to build greater on farm storage dams filled by more efficient use of water in the shoulders of the season and topped up with winter water would allow more irrigation in the driest months when restrictions may be on and more water is required. This helps to keep ground water charged up, takes out production lows enhancing waterflow and cashflow. Dam consents don't allow for this. The Manuherekia River flows have been augmented by Falls Dam for a very long time. Pre the Falls Dam the river ran very low at times and ran dry in severe droughts. Long-time locals will tell you their parents or grandparents told them of these times. The river is now and has been for 80 years sustained by Falls Dam. It was built during the Great Depression as a "Shovel Ready" project to give people work, help the economy then and sustain it into the future, which it has done. Similar to what is going to happen in the economy now due to Covid-19, to help out with unemployment and do projects that are good for the economy now and into the future. We and the government are looking long term. It appears now that Falls Dam is being seen as a naturally occurring structure which has been there forever keeping the river flowing in summer no matter how severe a drought might be. Dams through water storage enhance in-stream values.

Water Metering Regulations.

Water metering regulations came in to being in 2012 and evolved until 2016 depending on take. This has a huge and unfair bearing on allocation into the future. Meters have been hard to get, get installed, running correctly and with telemetry often poor reception all contributing to poor data being available. 2014 Mr King of ORC is on record saying leniency was applied to non-metering due to lack of availability of installers. In February 2016 ORC in a press release stated there was a scarcity of certified installers. It is clear that a large proportion of water permits were not metered which left a large gap in data. Consent holders who haven't got good water use records due to problems stated above can be penalised for not using enough of their allocation and will lose a portion of it. Even if records are complete the consent holder will lose a portion of allocation due to it being calculated over a short period of time 2012 – 2017 including a very wet season, two good rainfall years which pulls down the average usage just as a very dry season does due to less water used because of restrictions. Irrigators using water efficiently in the past will now be unfairly penalised for not using all their allocation. But if they had historically been inefficient and maybe detrimental to the environment, they would now be rewarded with full water allocation. The ones who have invested heavily in efficient irrigation are then penalised. This is not what is wanted or I think intended.

Why do the introduced trout seem to have so much value, are they held in higher regard than people, what do they contribute to the community and the economy? They prey on our little native fish. We have an area on farm which is the habitat of a rare native Galaxiid only because trout don't get there.

Summary.

Is PC7 really required when there seems to be enough mechanisms in place already to handle the required outcomes. This appears to be rushed and ill-conceived and not for the greater good of the community at large. I am not looking for the Plan Change to make irrigation easier and more profitable but I am also not expecting it to seriously affect the viability of our operation. There is room for a good outcome all round, that means for the environment, for the community and for the irrigator farmers. This has been on the radar for a while now but it appears that the water users are better prepared than ORC when it comes to hydrology/water flows data highlighting what is really going on in the district. Even though there has been a reasonably long lead in time for all to prepare, it now seems to be being rushed without enough good information to make decisions with especially on ORC's behalf. Why should irrigators who have staked their livelihoods on the irrigation water available now be held to ransom by a lack of good information in the hands of the ones [ORC] proposing the future use and availability of the water resource. On farm we are now pretty much all getting much better at looking after our environment and still achieving good performance and water efficiency. I wish the same could be said about urban sewage systems as an example. Covid-19 has shown a very quick cleaning up of the air and waterways around the world while the farm animals carried on as usual. Maybe people are the problem.