

ORC Water Permits Plan Change

Submission Reference no: 35

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Submitter Type: Not specified

Source: Web Form

Overall Notes:

Clause

Are you a trade competitor?

Position

I am a person who would not gain an advantage in trade competition through this submission

Notes

Clause

What are you submitting on? You can submit on specific parts of the plan change or the whole plan change.

Position

I am submitting on specific parts of the plan change (please detail below).

Notes

Clause

What is your view on the matter or the specific parts listed above? Please select one, if you have multiple views state clearly in the notes box below.

Position

Multiple views

Notes

Irrigated area: Any reference or restriction on irrigated area should be removed from Plan Change 7 I want the council to issue these short term consents with the lowest cost possible or at the full cost of the ORC using the best information available. Reduction in volume of water allocated for extraction, should be linked to established or future established minimum flows and not done in the absence of minimum flows. Where minimum flows are established the consenting process should be exempt from plan change 7, these consents should continue under the existing plan. Rules and methodology for calculating rate of take need removed from Plan Change 7

Clause

The reasons for my views are:

Notes

I am an irrigator in the Upper Taieri Catchment, we are shareholders in the Maniototo Irrigation Scheme and I am gravely concerned for the precedent set by the proposed rules and regulations Irrigated area: Limiting the size of irrigated area discourages irrigators from using water efficiently. This is because the same amount of water can be spread over a greater area of land with better infrastructure (modern centre pivot irrigators) and/or storage, there are significant environmental, economic and social gains to be made from encouraging this. We have been working on our farm to shift from traditional border dyke flood irrigation, to more modern and efficient spray systems water shares should not be tied to an area of land. Through this process we have gained environmental efficiencies by reducing run off to critical source areas. Based on precedent in our area when border dyke irrigation is converted to centre pivot irrigation we can reduce our kg N lost per ha from 20 units to 5 units. This would allow us to gain economic efficiencies by increasing dry matter production from 8-10 tDM/ha (per annum) to 12-15 tDM/ha on existing area irrigated. On the extra area that is now irrigated we measure an increase from 3-6 tDM/season to 12-15t DM/season. This means we can reliably finish all lambs and cattle born on our property and extra store stock. Social gains from this are that with increased production we now employ a lot mor local contractors and casual staff, adding to an already vibrant healthy rural community. It is worth noting this is a much more efficient system with lambs reaching kill weight quicker. Outputs are higher meaning our carbon footprint is reduced per kg of lamb produced. If irrigated area was tied to water shares, it would have diminished the incentive for us to upgrade these systems which have had a clear environmental, economic and social gains. Minimum Flows The Upper Taieri catchment is protected by 5 minimum flows, resource consents for takes upstream of a minimum flow point include conditions that users cannot take water once levels drop below the downstream minimum flow. These flows were set through a rigorous community consultation process to allow for aquatic ecosystems and natural character values and allow for the sustainable taking of water (Otago Regional Council, 2015). Sub catchments within the Upper Taieri also work to maintain residual flows (established through a similar process) on smaller rivers such as the

Kyeburn. Kyeburn Catchment traditionally had a very high number of deemed permits and the river would often run dry. These farmers relinquished these deemed permits and priority rights to allow for a modern flow sharing scheme where they work together to share flows as they decrease. They maintain a residual flow and the established Tiroiti minimum flow on the Taieri. This creates a win-win where social, environmental and economic values are considered to achieve best use. Establishing residual flows and minimum flows has meant that land owners are working together to maintain residual and minimum flows. This approach means that each water user can safely leave water in the river for others to use, knowing that the courtesy will be reciprocated, reducing competition between users and 'Tragedy of the commons'. I believe that what has been achieved in the Upper Taieri catchment is exceptional, but the precedent set by Plan change 7 will alienate rural communities from stakeholder groups who will resort to an adversarial process at high cost, and everyone loses. For this reason, I believe consents should be rolled over with minimal cost to landowners in catchments where residual flows are not set. Responsibility for lack of minimum flows in catchments such as the Manuherikia lies solely with the Otago Regional Council so irrigators should not be penalised. Following this the ORC should be encouraging group allocation and flow sharing to allow win wins for environmental, economic and social values. Rules and Methodology for rate and volume of take Plan Change 7 reduces the allocation of water available for extraction with no evidence of efficiency gains. It is careless of a regional council to propose policy with this effect that could seriously impact the health and wellbeing of rural communities. Water is most valuable to an irrigator when it is scarce. The methodology for calculating water indicates it will be reduced annually (10A.4.1 (6)) Some irrigation seasons are wetter than others so an allocation of water may not be used. If the abstraction in a wet year is lower than usual, that average will mean that the allocation of water is reduced over time. With this methodology the incentive for the irrigator is to take all his allocation every single season, so it is not diminished. This is a use or lose mentality, where even in a wet year when soils are saturated the full allocation will likely be applied. This has the potential to create negative environmental outcomes. Like us, irrigators will develop infrastructure using scientific data (aqualink reports) to use their set allocation with around 95-100% security. This means they will be able to fully irrigate that developed area gaining benefit from the expense. Below 95% security supply for existing infrastructure is unreliable. When this supply is diminished year by year irrigators will get to the point where existing infrastructure is no longer viable because it can not be used when it is most valuable. In the flipside, for an irrigator who has not yet developed to efficient irrigation systems, there is no incentive to do so because the cost of the infrastructure is too great for an unreliable water supply, so the incentive is to continue inefficient methods such as flood. This creates inefficiencies and means that opportunities for positive environmental, economic and social outcomes are lost. For our property, reducing water security, would decrease the number of lambs finished each year, reducing output and inefficiencies around GHG produced per kg of meat produced, the opposite of what we have been working to achieve. The best way to create win wins for environmental, economic and social values is collaboration between stakeholders and science to create minimum flows, then it will be transparent how much water is available, irrigators can then plan for storage requirements to cover shortfalls. Following this irrigators can work together to share water available leaving enough behind to meet residual flow and minimum flow requirements.

Clause

What decision would you like the Environment Court to make?

Position

Approve the plan change with amendments

Notes**Clause**

The reason(s) for my view and/or any amendment(s) I am seeking are:

Notes

Conclusions The pathway implied by policies rules and methodology in Plan Change 7 sends Otago down an adversarial pathway at high cost to all stakeholder groups. It will be more costly for the Otago Regional Council as they will somehow have to enforce all these rules. Costs of compliance will be passed on to irrigators along with costs created by diminishing water allocation without scientific data or economic impact reports. It alienates rural communities who often have a better understanding of how to achieve positive environmental and social outcomes than those employed to make the rules. I am gravely concerned for the health and well being of rural communities if Plan Change 7 is implemented. (see above for the details)

Clause

Do you wish to be heard in support of your submission? All submissions will be considered by the Environment Court. Please indicate if you wish to be heard in support of your submission.

Position

I wish to be heard in support of my submission

Notes**Clause**

Please indicate your choice(s) below. If you do not indicate your intention to call experts, you can change your mind later and decide to call experts to give evidence in relation to your submission, provided you do so in time to meet any procedural direction the Environment Court might make.

Position

If others make a similar submission I/we would consider presenting a joint case with them at a hearing

Notes

Clause

Authority to act:

Position

I confirm I have the authority to sign this submission on behalf of the submitter

Notes

The submitter have elected to withhold their personal details from publication.