



Waitaki Irrigators Collective Limited

Submission to the
Ministry for the
Environment

Measuring Up: Environmental
Reporting

Representative:

Organisation Name:

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About the Waitaki Irrigators Collective

The Waitaki Irrigators Collective Limited (WIC) is a company made up of shareholders comprising five irrigation schemes and a society of individual irrigators, that take water from the Waitaki River (or its tributaries) and use that water to irrigate land downstream of the Waitaki Dam. The company represents an irrigable command area of over 75,000 hectares, encompassing both North Otago and South Canterbury.

The shareholders of WIC are:

- Upper Waitaki Community Irrigation Company Limited
- North Otago Irrigation Company Limited
- Morven, Glenavy, Ikawai Irrigation Company Limited
- Maerewhenua District Water Resource Company Limited
- Lower Waitaki Irrigation Company Limited
- Waitaki Independent Irrigators Incorporated

These schemes and individuals use irrigation water for production across the primary sector, including the agriculture, horticulture, dairying and viticulture industries. Some of the schemes also provide water to other industries, town supplies and sports clubs. WIC represents a large number of farmers, farming companies and irrigators who create significant wealth for their communities, well beyond the farm gate.

Issues and objectives

In general, WIC is supportive of the government seeking to develop better mechanisms for national environmental monitoring.

Standardised state-of-the-environment monitoring will prove to be very valuable, as the current inconsistent monitoring is problematic, particularly for organisations such as WIC which work across different local authority territories. Authorities can have divergent approaches to environmental monitoring and the collation and dissemination of the data collected. The differences can make it difficult for organisations such as WIC to establish policies and strategies that are applicable across our command area. To some extent, this will always be an issue, as different authorities have different priorities and approaches, however standardised monitoring could help to drive more consistent rules and policies across local authority bodies.

The lack of common monitoring and reporting standards across regions can also lead to stakeholders not using a shared language or understanding of data and statistics. An example of this is in relation to water quality standards in different catchments which have different background environments. Standardised monitoring and reporting will reduce these problems to a large extent.

More robust time-series analysis will also mean that improvements or deteriorations in the environment can be better assessed and understood. This will assist in more effective decision-making and resource allocation and targeting. It may also mean that there is greater understanding of issues such as the lag times of activity effects. The environmental

effects of human activities will be able to be more readily assessed and understood through meaningful comparisons between like background environments.

Costs/benefits

WIC's main concern with the proposed monitoring is that it will potentially lead to duplication, over-monitoring and greatly increased costs; namely at the regional and local levels. As was described in the discussion document, local authorities currently undertake their own monitoring in order to discharge their duties under the Resource Management Act (RMA). However, the introduction of national monitoring standards will not remove these RMA duties. Instead, it will potentially simply lead to another layer of monitoring in addition to that which is already being undertaken by local authorities.

In effect, local authorities may not reduce or change the amount of local monitoring that is undertaken to meet their own requirements. This could see the amount of monitoring being undertaken increasing substantially, with the cost being passed on to land owners or resource users. The monitoring which is to be undertaken (at the national and sub-national levels) needs to be meaningful and useful.

The proposed Environmental Reporting Bill may be the best option to prevent this happening, as it will see the expansion of regulation-making powers. These regulations could provide a mechanism to guide local authorities to try and minimise duplication or excessive monitoring.

Increased monitoring will naturally mean increased costs for local authorities. These costs will likely be passed on to the community, as local authorities are not likely to be able to cover the costs of increased monitoring from current baselines. Although WIC appreciates that a comprehensive cost benefit analysis cannot yet be undertaken, the Collective would stress that the option chosen should seek to minimise the costs that will be incurred by local authorities and their communities.

Although developing standard monitoring across different regions is desirable, in reality it is likely to be very difficult to establish standardised monitoring across very different environments – many of which will have human developments which are deemed to be permanent as part of the background environment. Whichever option is to be selected, there needs to be consideration given to the need to recognise regional variations within the standard monitoring parameters.

Conclusion

In broad terms, WIC is supportive of the proposed approach which will improve the state of environmental monitoring in New Zealand. It will allow meaningful comparisons to be made across the country and over time. The government and non-governmental organisations will have better information and data to use when developing strategies which seek to minimise environmental harm from human activities.

However, it will be necessary to choose a method of developing the monitoring which minimises duplication and costs whilst still being scientifically and statistically robust.