Submitting on the **Action for Healthy Waterways** policy package

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**Submission on Action for Healthy Waterways Consultation**

**Given name(s):**

**Company name:** Manuherikia Irrigation Co-operative Society Ltd (MICSL)

*Surname:

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*Submitter type (individual, NGO, business/industry, local government, central government, unspecified/other):

Community Utility Network  
Owned & operated by MICSL Incorporated Society

**Introduction**

MICSL is owner and operator of a private community irrigation network taken over from the Ministry of Works back in 1989.

The Society’s purpose is to provide infrastructure to convey irrigation water sourced mainly from the Manuherikia River to its Shareholder Members being pastoral farmers, horticulturalists, viticulturalists and smaller farm holdings/lifestyle blocks.

We make this submission on behalf of our 380 Shareholder “irrigators”.

The prime proposal in the Action for Healthy Waterways document (8.2) and in the Proposed NES for Freshwater (Part3/Subpart 2/34 & 35) that is of concern to ourselves is the section referring to restrictions to be placed on intensification of land use.
Discussion of proposals

The Society has for many years been investing in, and improving the efficiency of, its conveyance infrastructure to ensure the best possible delivery of consented water volumes to its Members. The Members (Irrigators) have in turn been likewise investing in more efficient use of this water volume on farm/orchard/vineyard by such means as increasing use of spray irrigation, piped supplies, on farm storage etc.

In turn, as climate/soils/topography permit and market opportunities open up, our Members have gradually turned to more productive use of land and water resources.

This is most noticeably evident by increasing pastoral areas under spray, the development of Viticulture areas, the development and expansion of new and existing Fruit Orchards and specialist activities such as Flower growing. This progress is adding value to the land and water resource, the economic base of our region and the wellbeing of our people and community.

All these land use activities are a form of intensification, so it concerns us that under the restrictions clause of the Proposed NES, prohibiting expansion of irrigation areas greater than 10ha. and no changes permitted to land uses, such development progress could be stopped as an unintended consequence of such a broad-brush policy statement. Indeed landowners are already saying investment in more productive land use options is now not on their future planning horizons.

So from an Irrigation Company perspective we are custodians of delivery infrastructure for a precious resource that has now no where to grow in contribution to our local economy. Therefore we ask that the restrictions clause be flexible enough to allow the sort of low environmental impact land development we envisage possible in our region. Nil development will create stagnation and halt progress to the detriment of a rural community already under pressure from escalating costs and compliance requirements across a raft of commercial and primary production activities.

Recommending changes

Our recommendation would be to send a clear message within the Policy Statement/NES, that all types of intensification are not bad for the environment, and that the Policy Statement/NES, does not intend to stifle land use development and land use change as they can be shown to have nil (or at worst minor) effect on the goals of the policy. Set the bar too high, or the rules too restrictive, and our local economy could stagnate or go backwards socially, culturally and economically.