Your submission to Action for healthy waterways – consultation

John Morrison, Ardgour Pipeline Ltd (APL) (John Morrison)

Reference no: 1761

Submitter Type: Business / Industry

**Clause**

Proposals as a whole - please refer to questions 1-3 on page 19 of the discussion document

**Notes**

1: If implemented by consensus there are measures in the document that will halt further degradation of our waterways. These rules require buy-in and, in some cases, sacrifice so we urge proper consideration of all submissions. 2: Yes. By adopting Te Mana o te Wai as the basis for improving and maintaining the integrity and health of our waterways should slowly and steadily improve the water sources our economy and ourselves depend upon. 3: Fortunately our local waterways are relatively clean and free of contaminants and the regulatory regime instituted by the Otago Regional Council (ORC) should help to keep them that way. APL audit user’s farm environmental plans which is the framework for their on-farm compliance to ORC’s regulatory regime. APL’s constitution states shareholder non-compliance, thus compromising the company’s water permit, could result in non-delivery of water and their shares becoming worthless. We support the NPSFM concept of farms nationwide having these plans containing a farm’s environmental responsibilities. As our local waterways are clean however, APL would not welcome further regulation to simply comply with a nationwide requirement to clean certain rivers. In other words, if a region’s waterways already meet Te Mana o te Wai standards there is no point in applying any further regulations just to comply with an one-size-fits-all nationwide regulatory framework.

**Clause**

Impacts and implementation - please refer to questions 4-6 on page 19 of the discussion document

**Notes**

4: APL will comply with any regulations ORC will impose as a result of these NPSFM measures. APL would appreciate adequate prior notice of any changes so that our shareholders can be informed allowing them to can maWhat support or information could take any necessary changes. Again, we see any additional shareholder compliance is managed through their individual farm environmental plans. 5: All we require is certainty derived by consensus 6: This is one of the reasons we support building consensus on these proposals. If there isn’t sufficient buy-in from affected parties, ecosystem health will degrade as the tide of non-compliance rises.

**Clause**

Water commission and other comments - please refer to questions 7-8 on page 19 of the discussion document

**Notes**

7: Yes, as long as the body does not have too many political operatives appointed to it. 8: None

**Clause**

Te Mana o te Wai - please refer to questions 9-12 on page 36 of the discussion document

**Notes**

9: Yes 10: Yes

**Clause**

New planning process for freshwater and redrafted National Policy Statement - please refer to questions 17 on page 36 of the discussion document and questions 40-42 on page 53

**Notes**

17: Yes, APL’s water permit was granted within a relatively short time back in 2009, we cannot see any reason for this to not continue

**Clause**

Nitrogen, phosphorus, and sediment attributes - please refer to questions 20-21 and 30-35 on pages 52 and 53 of the discussion document

**Notes**

20: Yes as we believe these attributes adequately describe waterway health so proper management will maintain or improve waterways 21: Yes, as it makes scientific sense 30: Yes. Excessive amounts of these two nutrients degrade waterways so if the ultimate goal is to have swimmable waterways contamination by N & P has to be limited. Where those limits are set is really for Councils and science to determine. 31: As mentioned earlier, the N & P contamination levels in local rivers are currently below the bottom lines so APL does not envisage much change, as long as a regulatory regime isn’t imposed that demands further reductions to these levels
Clause
Swimming - please refer to question 36 on page 53 of the discussion document
Notes
36: Yes, APL certainly does not support faecal contamination of swimmable waterways and the Quantitative Microbial Risk Assessment seems to be proper science to evaluate the suitability of swimming in a particular waterway.

Clause
Restricting further intensification - please refer to questions 51-53 on page 80 of the discussion document
Notes
51: Although APL generally supports restrictions on intensification without the proper evaluation of the effects on the environment this may have, we wish to draw your attention to the issue below that directly affects us. APL has a water permit with environmental conditions, a specified command area and known irrigable hectares. There are however, some hectares that are not currently irrigated but are included in the command area and the shareholder’s farm environmental plan. Is it incumbent on the shareholder to develop these periodically grazed but ‘undeveloped’ hectares before the next deadline?

Clause
Farm plans - please refer to questions 54-57 on page 80 of the discussion document
Notes
54: Mandatory farm plans as they are the one place where a farm's environmental effects can be managed and aligned with a council's regulations. Given that the future of farming requires a degree of compliance, farm plans is the one place where that compliance can be managed, otherwise there would be a mess. 55: A freshwater module, nutrient and sediment management modules as well as the farm's ETS plan 56: APL believes farm plan priorities are correct but the roll out timeframe can be tighter. APL recognizes however, there may well be a shortage of expertise to support this process 57: Individual shareholders funded the preparation of their own farm plans but APL funds the auditing of them. Any remedial work required of a shareholder to ensure compliance would be funded by that water user