Submission on Action for Healthy Waterways Consultation

Company name: Ida Valley Irrigation Company Limited

Contact person: C/- Nola Nevill, Secretary

Submitter type: Irrigation Company

Introduction

The Ida Valley Irrigation Company provides irrigation water to land owners/farmers in the Ida Valley and Galloway areas of Central Otago. The company operates two large concrete arch storage dams, the Poolburn Dam and the Upper Manorburn Dam, together with significant race and culvert infrastructure for the delivery of water.

The irrigation company delivers to approximately 49 shareholders who own land that is able to be provided with water from the storage dams. Approximate 26,690,000m$^3$ of water on average is provided each irrigation season from 1st September to 30th April.

The Ida Valley Irrigation Company Limited submit on a number of the fresh water management proposals as follows:

1. **New planning processes for fresh water under Resource Management Act**
   Any new planning process needs to be debated in full at the time that the proposed legislative change is drafted. It is difficult to submit or debate changes effectively without the draft changes to hand. Particularly the restricted avenues for appeals which is important to understand the proposed limitations to any right of appeal. Any regional council decisions or outcomes are only the result of an effective process which requires the input of all robust information available that affects the outcome of the decision.

2. **Mandatory farm plans**
   While the requirement of mandatory farm plans is not objected to per se, it is important that farm plans and any administrative processes ensure that the required environmental outcomes are obtained. The farm plans and audit process should not become tick box exercises and should be a simplified cost effective exercise to ensure environmental outcomes are obtained. The farm plans should be about modifying or changing behavior as required and maintaining environmental outcomes, not merely additional administrative cost for all water users. They should be an effective working tool to enable best practice, not merely an additional compliance regulatory burden and cost.

3. **National requirements for fish passage**
   It is important that the requirements for fish passage be determined at a catchment level as the topography, biodiversity and fresh water environment is different for each catchment. It is important to ensure that a “one size fits all process” is not applied. Requirements for fish screens that add additional cost without environmental benefit is not appropriate. It is important
that the fish screen regulation is able to apply differently to each individual catchment requirements.

4. **Telemetry of water takes**
The proposed requirement for telemetry takes to be measured every 15 minutes and electronic records transmitted daily may not be appropriate in limited instances. It is important to note that the Ida Valley Catchment Area, for storage is isolated and high country. The requirements may be difficult to meet because of the isolation of the sites, the difficulty to attend the sites at times of rainfall and snow if there has been a break or damage to the measurement infrastructure. Further, telecommunications and/or power are not available at a number of sites.

The requirement to have all water take site measurement tools comply with one rule is extremely difficult given the Alpine nature of the company take points and the weather affecting it. Appropriate rules for those particular takes need to be developed and time provided for implementation. All the company takes are metered, however we do regularly have difficulty accessing our takes in the high country area, and the ability to repair and maintain is limited because of the isolation and of our topography. These matters need to be taken into consideration in any proposed regulation.

5. **Restrictions placed on intensification of land use**
The requirements for the consent for changing the land use, irrigation development and increased winter grazing requires careful consideration. The change in land use does not in and of itself, mean intensification, and together with irrigation development may mean more appropriate use and application of water than a current land use system. The current Otago Regional Council plan for water management requires compliance with maximum allowable effects and it is submitted that this is an appropriate way to manage water quality as an effects based system, not a mandatory requirement to obtain consents for any changes if the effect remains unchanged.

It is also submitted that the grandfathering nature of this proposed regulation does not assist in obtaining the best results going into the future. Just because an activity has been carried out in that manner at that site does not always mean it is the best activity to be carried out in that manner on that site into the future. Rigid rule application requiring consent for any land use change minimises the ability to change use effectively and appropriately and the rule may have the unintended consequences of merely continuing a status quo that is not appropriate.

6. **Stock exclusion from water bodies and setback for water bodies**
The requirement for a five metre setback for streams and rivers more than one metre across appears excessive. This requires clarification, as at five metres from each bank, this is a ten metre exclusion zone, which will remove significant area from productivity without sufficient evidence that that exclusion zone area is required for the water quality requirements. Given that a number of streams within the Central region are ephemeral then an exclusion zone of five metres from either side is not appropriate. It is also noted that the effects of flooding in high rainfall can be exacerbated by excessive vegetation in and around streams and that may be an unattended consequence of such regulation.

7. **Controls imposed on winter grazing**
Any required rules regarding winter grazing should be based on the effects of the activity and not simply the activity itself. There should not be a one size fits all rule given that the activity is carried out on a number of different land types topography climates and it is important to ensure the effect of the activity is monitored for a water quality basis, not just the activity. These rules should be managed on a catchment/regionwide basis.
Conclusion
The submitter supports the requirement for good water quality, given that good water quality is essential for the ongoing viability and prosperity of the shareholder’s businesses and as important, the communities of the district.

The Ida Valley Irrigation Company has been providing water to its’ shareholders for irrigation for 30 years. Prior to that the dams were Crown owned and operated and have been providing irrigation water since the 1930’s. These irrigation dams are vital to the district and the communities’ wellbeing and existence. Any proposed regulatory requirements should ensure that the wellbeing of the community and the social and economic impacts to the farmers and the communities they belong to are measured, quantified and taken into consideration. If changes are required to ensure ongoing good water quality, then the change needs to be managed in a timeline that is appropriate for the businesses and communities to sustain.

It is submitted that there has been no adequate (if at all) review or information around what some of these proposals may mean for communities, both economically and socially, and business in specific regions and this is an essential part of the information required to make the appropriate decisions that will not have unintended consequences.

By the Directors
Ida Valley Irrigation Company Limited