Dear Sir/Madam,

Central Otago Winegrowers Association (COWA) Incorporated submission on the Action for Healthy Waterways

Thank you for the opportunity to submit on the proposed Actions for Healthy Waterways.

COWA is the member body for wine growers located in the catchment area covered by the Otago Regional Council. We represent over 95 growers, makers, brand owners and associated industry participants. From modest beginnings in 1987 with the first commercial release of table wine the industry has grown to over 2000 planted hectares. We contribute to approximately 600 full time equivalent jobs and inject a huge amount of money into the local industry, either directly through wages and the purchase of material but also via the rapidly growing wine tourism market.

COWA supports the broad thrust of the Actions for Healthy Waterways. Water is an integral component of our culture and livelihood and should receive an appropriate level of protection. We support the desire to gradually improve water quality over time.

National Policy Statement Freshwater Management (NPS-FW)

In the NPS-FW Te Mana o te Wai is regionally defined as being "The health and wellbeing of the water will be put first in decision making providing for essential human needs, such as drinking water, will be second, and other uses will follow". We suggest that this definition is particularly amorphous and lacking in precision. The degree to which this is currently defined will inevitably lead to different interpretations and potentially unforeseen and illogical outcomes.

Outcome Sought: We suggest that the definition of Te Mana o te Wai be tightened to ensure more regional consistency and precision in interpretation and application.

National Environmental Standards for Freshwater (NES-F)

We note that the NES-F defines farms as a property over 5 hectares. The NES-F requires all farms must have a Freshwater Module of a Farm Plan (FM-FP) which must be annually certified and audited. This will apparently cost in the region of $3500 to create and $1500 to audit/certify. New Zealand Winegrowers has developed and utilised the Sustainable Winegrowing New Zealand (SWNZ) platform which will achieve, we believe, the same outcomes as a FM-FP. We further note that the requirement for a FW-FP does not recognise that growing grapes have very low inputs and extremely low impacts on the environment.
Outcome sought: We recommend that the SWNZ program be granted equivalence under the NES-F and becomes an accepted tool as a FM-FP. We further recommend that the size of vineyards being recognised as a farm be increased to 20 hectares to recognise the very low impact that vineyards have on waterways. This will balance the need to manage impacts on the environment with the need to demonstrate compliance with the NES-F.

Under the NES-F all intensification of land use including any increase in irrigated production area greater than 10 hectares will require a resource consent including a certified FM-FP showing no increase in Nitrogen (and others) leaching against a 2018/19 baseline. These consents can only be granted until 31 December 2030. This does not recognise the low inputs nor the extremely low impact grape growing has on the environment. We believe that this is an unacceptable restriction on the right to farm and will create such a significant burden on farmers that it is likely to restrict the expansion of existing vineyards or the development of new properties.

Outcome sought: The limit be increased to 50 hectares from 10 hectares and the requirement to demonstrate no increase in Nitrogen is waived for vineyards, given their demonstrated low Nitrogen outputs.

One of the key tools to be deployed to assess Nitrogen leaching is Overseer. This software was developed in partnership with commercial suppliers of fertiliser to industry and the wine industry has not been able to access the algorithms which drive the calculation. Furthermore, as an industry we are such a low emitter that we fall into the margin of error on the tool.

Outcome sought: We recommend that NZ Winegrowers and the scientific community be granted the opportunity to supply Overseer with the data for the wine industry and ensure that the algorithms properly capture and calculate Nitrogen Leaching for the wine industry.

Yours Sincerely,

James Dicey
On behalf of the Central Otago Winegrowers Association Incorporated.