To whom it may concern,

Please find attached a submission towards the proposed Freshwater Management Policy from Maniototo Eastside Irrigation Company Ltd.

Regards

Renee Weir
MESIC Company Secretary

To : Ministry for the Environment

From : Maniototo East Side Irrigation Co Ltd

Re : Government Essential Freshwater Proposals

* As background the Maniototo East Side Irrigation Co Ltd (MESIC) is an entity that was formed to construct and manage the East Side extension of the Maniototo Irrigation Scheme in Central Otago in the 1990’s.  
* There are 15 farming families and entities who are the sole shareholders of the MESIC that supplies irrigation water to some 4000 ha of land in the southern end of the Maniototo Plain.
* The farms are a mix of 11 sheep & beef as well as 4 dairy farms. As the area is frost prone intensive horticulture is not a viable land use option.
* At the most recent AGM of MESIC it was resolved that a submission be made by the Company on areas that are of concern to our shareholders. As Chairman of MESIC I make this submission on behalf of its 15 constituent shareholders.

This is not a “pro forma” submission but deals directly with 3 broad issues, namely:
1. That this package is a blatant attempt to circumvent existing statute (namely the Resource Management Act 1991) in not recognising the “social & economic” use of water

2. That as the package is written, with respect to “intensification”, continuing efforts of irrigators to make on farm improvements to their irrigation application methods to improve both economic and environmental outcomes would be totally frustrated.

3. That the use of “top down – one size fits all” prescriptive planning processes proposed by the package will lead to inferior environmental outcomes than the use of specific localised initiatives to improve water quality.

1. MESIC activities in supplying irrigation water not only result in supporting the farming families and businesses involved, but are the lifeblood of the numerous businesses that service the MESIC shareholders, be they agricultural contracting businesses livestock transporting businesses, engineering concerns etc. The continued access to water is vital for the “social & economic” aspects of our community.

Currently our access to water is overseen by the Resource Management Act as administered by the Otago Regional Council. The current statute requires the Council to have regard to not only the environmental effects of water use but also to the social and economic aspects of the use of such a resource – namely water.

However the proposal that we now submit on, while strong on delivering to the environmental aspects of water use, is totally silent on any reference to social and economic aspects. We would contend that the “Essential freshwater Proposal” is inconsistent with current statute. In effect the architects of the proposal are attempting to rewrite law without such proposals having to undergo parliamentary scrutiny.

We submit that while the use of “National Policy Statements” are a tool that has genesis in the RMA, for such planning tools to have status they must be consistent with the RMA. To ignore “social & economic” aspects, as the package does, must be addressed.

Without such a change to the current proposals, the MESIC shareholders have real concerns that the bar for renewing water permit consents may be raised to such a degree that such a move will have serious consequences not only for the MESIC shareholders, but for the wider community that depends the economic activity of these farming enterprises.

2. The moratorium on any land use intensification will have unintended consequences that could well impact on the shareholders of the MESIC.

Some 60 years ago all irrigation water applied in the Maniototo was by the “wild flood” method. Over time in order for the farmers involved to improve the efficiency of that water use (to make a finite volume of water irrigate an increasing number of hectares) we have seen the advent of application by border dyke, which in turn has now been superceded by various methods of spray irrigation.
Our reading of the proposal would preclude a MESIC shareholder upgrading from wild flood to spray as the resultant increase in stocking rate would be deemed to be “intensification”. This is in spite of the fact that the “wild flood” may currently be causing environmental degradation by its inherent runoff to waterways. A change in application method to a center pivot to address the current environmental problem would not be permissible in the immediate future as the current proposal stands.

Thus we would submit that the current proposed ban on intensification is in need of a major overhaul.

3. There is general agreement within the farming community (including the MESIC shareholders) for actions to improve the status of our freshwater resource where so required.

But the use of prescriptive restrictions, using the National Policy mechanism, with its inherent “one size fits all” approach, will not only fall short on achieving the overall objective, but also have major negative consequences for rural New Zealand.

We submit that a “bottom up” approach will produce greater environmental progress than the proposed “top down” process.

To demonstrate, farmers in the Maniototo have been very proactive over the last 2 years in running an extensive water quality study of all waterways in the Maniototo, both large and small. As would be expected this unearthed a number of catchments that needed remedial action. In conjunction with the Otago Regional Council, those involved with the catchments concerned have instituted a plan to address the specific issues that the water testing identified. This “bottom up” approach is actually addressing the problem now – problems have been identified and dealt with at the grass roots level.

We would contend that such local community efforts, supported by the significant growth in the “Catchment Group” movement throughout rural NZ, will identify and confront water quality issues producing real environmental gain. This approach will succeed where history will record well meaning efforts to produce individual farm management environment plans will be a costly failure.

Further well meaning efforts of policy people based in MFE in Wellington producing prescriptive “one size fits all” directives to the Regional Councils will not only fail, but will frustrate the current efforts directed at improving environmental outcomes that are already gathering momentum in rural NZ.

James A Herlihy  BRS

Chairman
Maniototo East Side Irrigation Co Ltd

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