



Rangitata Diversion Race Management Limited

**Proposed Amendments to the National Policy Statement for
Freshwater Management 2011
Discussion Document**

To: Freshwater Reform
Ministry for the Environment
PO Box 10362
Wellington 6143

By email: watersubmissions@mfe.govt.nz

Submission on: Proposed Amendments to the National Policy Statement for
Freshwater Management 2011 – Discussion Document

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Signature:

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Date: 4 February 2014

1.0 INTRODUCTION AND OVERVIEW

The Rangitata Diversion Race Management Limited (hereafter referred to as '**RDRML**' or '**the Company**') is a water supply company responsible for the (i) delivery of water to its shareholders, and (ii) maintenance, control and management of the Rangitata Diversion Race (hereafter referred to as '**the RDR**') and its associated structures. The 67 kilometre long RDR, which is located wholly in the Ashburton District, provides water to:

- The Mayfield Hinds Irrigation Scheme, which can irrigate up to 44,900 hectares of land;
- The Valetta Irrigation Scheme, which can irrigate up to 13,245 hectares of land;
- The Ashburton Lyndhurst Irrigation Scheme, which can irrigate up to 36,341 hectares of land;
- The Montalto Hydroelectric Power Station, which has an installed generation capacity of 1.8MW;
- The Highbank Hydroelectric Power Station, which has an installed generation capacity of 28MW;
- The Ashburton District Council for stock water purposes; and
- Barrhill Chertsey Irrigation Limited ('**BCI**'), which has an agreement in place whereby the RDR facilitates the supply of water to BCI shareholders.

Put simply, the diversion race takes water from the Rangitata and South Ashburton Rivers at a maximum rate of 35.4 cubic metres per second, and delivers it to the power stations in winter (when demand for electricity is high) and to the three irrigation schemes (being the Mayfield Hinds, Valetta and Ashburton Lyndhurst Schemes) in summer. The irrigation schemes have priority of access to water in the summer, which is when the demand for irrigation is high, while the power stations have priority of access outside of the irrigation season. The RDR is the largest race that supplies water for irrigation in New Zealand. Its supply of water to the two hydroelectric power stations enhances the efficiency of its operation. Together, the RDR, the irrigation schemes, and the hydroelectric power stations are a nationally significant resource.

This submission is made to the '*Proposed Amendments to the National Policy Statement for Freshwater Management 2011: A Discussion Document*' (hereafter referred to as the '**Discussion Document**'). The RDRML is aware that this consultation process seeks to inform the proposed amendments to the National Policy Statement for Freshwater Management 2011 (hereafter referred to as the '**NPS FM 2011**'). The Company records that it wishes to be involved with all (currently proposed and future) amendments of the NPS FM 2011.

2.0 STRUCTURE OF SUBMISSION

The RDRML is generally supportive of the intention of the amendments proposed in the Discussion Document. The Company notes that the proposed amendments aim to make the NPS FM 2011 more effective and to improve the way in which freshwater is managed in New Zealand. The amendments proposed build on the recommendations of the Land and Water Forum and are intended to ensure that regional councils account for all water takes and sources of contaminants, in order to inform decisions on the setting of freshwater objectives and limits. While the RDRML supports the aim or intent of the proposed amendments, the Company has a number of concerns and points of clarification that it considers must be addressed before amendments to the NPS FM 2011 are advanced. Further the RDRML considers that the Water Research Strategy, Resource Management Act 1991 (hereafter referred to as the 'RMA' or 'the Act') Reforms, amendments proposed within the Discussion Document and national guidance material prepared to support the same, should be advanced together, in order to provide clarity, and ensure that all of the various documents, policies and proposed changes, fit together cohesively.

The RDRML's specific points of submission are included within **Table A**, which is attached within **Appendix One**. In this regard, Table A identifies one general submission point and seven points of submission which relate to the specific amendments proposed within the Discussion Document and freshwater management more generally. These are:

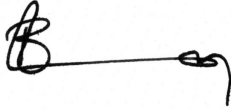
- 1: *The Importance of Adequate Consultation;*
- 2: *Accounting for Water Quality and Quantity;*
- 3: *A National Objectives Framework;*
- 4: *Setting Compulsory National Values;*
- 5: *Setting National Bottom Lines;*
- 6: *Exceptions to the National Bottom Lines;*
- 7: *Articulating Tangata Whenua Values; and*
- 8: *Monitoring.*

3.0 SUMMARY

In summary, the RDRML supports the overall intent of the amendments proposed within the Discussion Document, which seek to make the NPS FM 2011 a more effective document and to improve the way that freshwater is managed in New Zealand. As outlined in the Company's submissions, while the RDRML agrees that the NPS FM 2011 requires amendment, the Company has concerns with some aspects of the proposed amendments and the implications that they may have on both the Company, and its shareholders. Overall the RDRML considers that a number of the amendments require clarification, additional thought and refinement, and consideration of the appropriate time for implementation, as set out in the submissions included within Table A (within **Appendix One**). Further, the RDRML considers that it is crucial that all of the freshwater reforms currently being progressed should be advanced together as a package, so as to ensure that they fit together cohesively.

The RDRML would be happy to meet with the Ministry for the Environment to discuss the points raised within its submission, or any questions, or queries the Ministry might have, regarding the same. Please do not hesitate to contact the undersigned to arrange such a meeting. Further, and as set out within this submission, the RDRML wishes to be involved with all (currently proposed and future) amendments of the NPS FM 2011.

Yours faithfully

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Chief Executive Officer – Rangitata Diversion Race Management Limited

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