

SUBMISSION FORM (Print clearly on both sides)
Proposed Plan Change 6AA to the Regional Plan: Water for Otago
Form 5, Clause 6 of Schedule 1, Resource Management Act 1991

Office use only

Name of submitter:

Fraser McKenzie

Name of organisation (if applicable):

Waitaki Irrigators Collective Limited

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Oamaru

New Zealand

Postcode:

9444

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03 434 7944

I wish **do not wish** (circle preference) to be heard in support of my submission.

If others made a similar submission, **I will** consider presenting a joint case with them at a hearing. *(Delete if you would not consider presenting a joint case)*

Trade competitor's declaration (if applicable) **Not applicable**

I could / could not (circle one) gain an advantage in trade competition from this submission

I am / am not (circle one) directly affected by an effect of the plan change that

(a) Adversely affects the environment; and

(b) Does not relate to trade competition or the effects of trade competition.

Signature of submitter:



F McKenzie - Independent Chair

Date: 04 November 2019

*(Or person authorised to sign on behalf of person making submission.
Signature not required if you make your submission by electronic means)*

Please note that all submissions are made available for public inspection.

SUBMISSIONS MUST BE RECEIVED BY 5.00 PM ON MONDAY 4 NOVEMBER 2019



Send to:
Freepost ORC 497
Otago Regional
Council
Private Bag 1954
Dunedin 9054

State what your submission relates to and if you support, oppose, or want it amended:

(e.g. support rule 'x', or amend policy 'y')

Waitaki Irrigators Collective Limited is in support of proposed Plan Change 6AA to postpone the date that the conditions come into force from 1 April 2020 to 1 April 2026.

We understand that this change affects: Policy 7.D.2; Rule 12.C.1.1; Rule 12.C.1.1.A; Rule 12.C.1.3 and Schedule 16A. We also note that no other change to the Regional Plan: Water for Otago is proposed as part of this plan change.

State what decision you want the Otago Regional Council to make:

(e.g. amend policy 'y' to say....)

Waitaki Irrigators Collective Limited would like the Otago Regional Council to approve the proposed Plan Change 6AA with the comments on the attached letter to be taken into consideration.

PLEASE SEE ATTACHED LETTER FOR FURTHER COMMENTS

Give reasons for the decision you want made:

(e.g. I want policy 'y' changed because...)

Please attach any additional information.

SUBMISSIONS MUST BE RECEIVED BY 5.00 PM ON MONDAY 4 NOVEMBER 2019

Post to: Otago Regional Council

Private Bag 1954

Dunedin 9054

Email to: policy@orc.govt.nz

Deliver to: Otago Regional Council offices at:

70 Stafford Street, Dunedin

William Fraser Building, Dunorling Street, Alexandra

Terrace Junction, 1092 Frankton Road, Queenstown

Online at: yoursay.orc.govt.nz/6AA

Please note:

Your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



Submission to Proposed Plan Change 6AA to the Regional Plan: Water for Otago

From : Waitaki Irrigators Collective (WIC)
Chairperson : Fraser McKenzie
Address : Level 1, 72 Thames Street, Oamaru 9400, PO Box 159, Oamaru 9444, New Zealand
Phone : 03 434 6721
Email : admin@waitakiirrigators.co.nz

Waitaki Irrigators Collective (WIC)

WIC is a not-for-profit entity made up of shareholders comprising six irrigation schemes and a society of individual irrigators, which take water from Lake Waitaki, the Waitaki River, or its tributaries and connected groundwater and use that water to irrigate land downstream of the Waitaki Dam. The company represents an irrigated area of around 85,000 hectares across North Otago and South Canterbury.

WIC's mission is:

To act as the collective social conscience of the WIC membership to encourage, promote, facilitate and communicate those actions that will benefit the members, the River and the community so that the uniqueness of what the River is and means to the Waitaki district is understood and maintained.

The shareholders are:

- the Kurow-Duntroon Irrigation Company Limited
- the North Otago Irrigation Company Limited
- the Morven, Glenavy, Ikawai Irrigation Company Limited
- the Maerewhenua District Water Resource Company Limited
- the Lower Waitaki Irrigation Company Limited
- the Waitaki Independent Irrigators Incorporated Society (which includes Haka Valley Irrigation Limited).

A unique aspect represented by WIC is that although its membership sits across two regions (Canterbury and Otago) they have elected to voluntarily take a Catchment approach to its activities as WIC has long had the value of the Waitaki River being the lifeblood of our area.

This submission relates directly to those of our membership that take and use water under the Otago Regional Council rules and consents.

Signature 
Fraser McKenzie – Chair

Date 04/11/2019

WIC is submitting on the proposed Plan Change 6AA as described below:

Plan Change 6AA proposes to postpone the date at which conditions on discharge contaminant concentration and on nitrogen leaching come into force, from 1 April 2020 to 1 April 2026. It is expected that the full review of the Water Plan will be completed, and a new Plan in place, before 1 April 2026.

This change affects:

- Policy 7.D.2
- Rule 12.C.1.1
- Rule 12.C.1.1A
- Rule 12.C.1.3 and
- Schedule 16A

No other change to the Regional Plan: Water for Otago is proposed as part of this plan change.

WIC is in **support** of the proposed change to the date that the conditions come into force, from 1 April 2020 to 1 April 2026 with the following comments to be taken into consideration:

- Ø We note that our membership has diligently worked to comply with Plan Change 6 deadlines and conditions ever since it became operative.
- Ø We note that our membership has requested on multiple occasions for direction on what we considered ambiguous and unenforceable rules.
- Ø We note that we will continue to encourage and promote Good Management Practices and innovative projects amongst our membership despite the extension of the date for compliance.
- Ø We note that our membership fully supports the desired outcomes of maintaining and improving water quality across the region.
- Ø We agree that having rules in place that create a situation where the Water Plan's rules result in unnecessary consenting costs and distraction for staff and farmers on achieving actions should be avoided.
- Ø We highly endorse the use of catchment groups to facilitate the management of discharges at a catchment scale.
- Ø We are keen to be involved as a key stakeholder, along with iwi and others, in discussion of strategic matters and note the two MOU's that were negotiated between ORC and WIC during the mediation for Plan Change 6A.
- Ø Finally, we direct ORC to the Building Trust project that we are developing in association with Irrigation NZ, ECan and hopefully ORC that has a goal of creating a visual interface for the presentation of water quality data at a farm and catchment level that indicates our intent to continue to collect data even with the extension of date proposed by Plan Change 6AA.