
COMMENTARY

ON THE

DRAFT CANTERBURY WATER MANAGEMENT STRATEGY

NAME OF PARTY COMMENTING: Ellesmere Irrigation Society Incorporated.

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SIGNATURE OF SUBMITTER (or person authorised to sign on behalf of submitter)

D P McEvedy
Chairman – Ellesmere Irrigation Society Incorporated

Background of the Submitter

The Society is made up of consent holders of water take and use permits located between the Rakaia and Selwyn Rivers and east of State Highway 1 to the east coast. This area is located within the existing Rakaia Selwyn Groundwater Allocation Zone under the provisions of the Proposed Canterbury Natural Resources Regional Plan (PNRRP).

The Society was formed in 2009 in order to provide a collective representation on water related issues, predominantly in respect to irrigation and the protection and maintenance of the water resource, both ground and surface water, within the Ellesmere area of the Canterbury Region. The Society also encapsulates the area of consent holders ECan determined to be within the Cluster 2, 4 and 5 Groups as part of the Rakaia Selwyn Groundwater Allocation Zone Resource Consent Review.

Up until now the Society has not had a significant input into the preparation of the Draft Canterbury Water Management Strategy (hereafter referred to as 'the Strategy'). This is because the Society has only very recently been formed (June 2009) and has been primarily concentrating on representing its members throughout the lengthy consent review process.

The Society has a significant interest in the Draft Canterbury Water Management Strategy and would be agreeable to engaging in any discussions relating to the matters raised in the following commentary. The submission is made up of two sections:

- Section 1: Overall Comments
- Section 2: Specific Comments

Date

SECTION 1: OVERALL COMMENTS ON THE DRAFT CANTERBURY WATER MANAGEMENT STRATEGY

Overall Support for Canterbury Water Management Strategy

- 1.1 The Society wishes to express its overall support for the development of the Strategy. It is recognised that there is significant pressure on the water resource within the Canterbury Region and that this resource needs to be protected and maintained in a way that will not only retain the quality and quantity of it but at the same time provide for the social and economic needs of the associated communities.
- 1.2 It is imperative that what is eventually provided in the final version of the Strategy is then carried out in the form of directly related legislation and regulation. It would be considerably disappointing to have gone through the process of developing what should be a resultant sound strategy that was then failed by irrelevant or weak legislative or regulatory policies, practices and/or frameworks.
- 1.3 Essential to the overall success of the Strategy, and its impending implementation, is the engagement of stakeholders and the public in the process and ensuring their views and knowledge is listened to and dutifully considered.

Key Options

- 1.4 For some time Environment Canterbury has considered the state of the lowland streams in the Rakaia Selwyn Groundwater Allocation Zone (RSGAZ) to be indicators of the pressure that the ground and surface water resource is under in this area. For example, one of the key issues affecting the lowland streams in the Ellesmere area is a reduction in the flow of the Selwyn River. A reduced flow, and in some cases cease of flow in stretches of this river, can result in some lowland streams and/or drains going dry for large portions of the summer months and irrigation period. One option may then be to introduce water to the Selwyn River system. However, looking at the bigger picture the sensible alternative for the zone as a whole is simply introducing new water to the zone to relieve the pressures on the existing groundwater system.
- 1.5 A key option therefore is to match any new water brought into the system, on a pro rata basis, with the removal of ground water takes on the Upper Plains in the RSGAZ. For example, for every cumec brought onto the Upper Plains, the equivalent of 0.5 cumecs should be removed from instantaneous groundwater take. This would then remove pressure from the groundwater system and allow for some additional recharge from infiltration and not totally stop growth or development. To illustrate further, if 20 cumecs of water was brought onto the Upper Plains on this basis we would likely see 10,000 hectares of new development and 10,000 hectares no longer relying on groundwater supplies. This would result in a substantial reduction in the groundwater take and a significant release of pressure on the groundwater system. This is only one proportional example, but any sort of water balance system where in effect a percentage of any 'new' water is compensated with the relinquish of an amount of groundwater take would assist the rejuvenation of the groundwater system.
- 1.6 Another option, which could work in conjunction with the option discussed above, is restricting any new takes from groundwater in the RSGAZ.

- 1.7 Augmentation of some streams may also be an option where it was proven feasible and cost effective.

Concerns

- 1.8 One of the overriding concerns that the Society has with the Strategy is the theme that runs through the document which implies that all farmers are doing 'bad farming'. This is not the case. There are a significant number of farmers who are utilising the water resource in a responsible, efficient and environmentally sound way. The presumption that all farmers are exploiting the resource to its maximum potential or beyond is unsubstantiated.
- 1.9 Achieving the goals set out in the Strategy will require a huge volume of work for all stakeholders. Strategies in themselves to deal with this workload need to be addressed.
- 1.10 As the lowland streams are considered key indicators of the health of the groundwater system then the level of their restoration has to be carefully considered along with the level of values associated with them.

SECTION 2: SPECIFIC COMMENTS ON MATTERS RAISED IN DRAFT CANTERBURY WATER MANAGEMENT STRATEGY

Section and sub-section of Strategy	Page Number	Paragraph Number	Comments from the Ellesmere Irrigation Society Incorporated
Executive Summary 'Allocation and use of groundwater'	15	Paragraph 1	This paragraph says that farmers in the lowland areas are suffering from unreliable water supplies in dry years. This is not the case in the Ellesmere area. There is no unreliability of irrigation wells in this lowland area.
Executive Summary 'Water allocation and charging regime'	15	Paragraph 2	It is not universally accepted that there will be the need for a charging regime. There needs to be significant stakeholder input into any development of such a regime to ensure that it's fair and equitable.
Executive Summary 'Auditing and enforcement'	16	Third bullet point	The development of any system relating to performance ratings need to be carefully worked through. Water use efficiency may not necessarily mean efficiency for the environment. Consideration needs to be given to what is 'efficient'. This is a major issue for this Strategy. Any ratings developed need to take in not simply the type of irrigation system used but also, soil types, period of irrigation, irrigation types etc.
Section 1 Role of the Strategy 'Need for a strategy'	17	All paragraphs in this sub-section	The Society agrees strongly with the need for such a strategy. However, this section of the strategy seems to minimise the importance that the lakes, rivers, streams and aquifers are to economic and social well being within the associated communities and the country as a whole. Specific recognition is given to importance that these water resources are to tangata whenua but the same is not provided to the wider community. Recognition needs to be added in relation to this.
		Third paragraph	Recognition needs to be made that not all lowland streams are suffering from a decline in health. In some cases there is very little knowledge of the state of some of the lowland streams, while some streams are actually showing improved states. The generalisations in this paragraph need to be better defined and the relevant regulating authority needs to commit proper resourcing to the effective monitoring of all the lowland streams.
		Eighth and ninth paragraphs	The Society considers that the Strategy is important to progress the realistic and appropriate management of water in the region. However, there needs to be clear guidance given as to how this document will fit and be implemented in relation to

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			other legislative and regulatory frameworks. Too often such strategies get ignored because they lie beyond these mechanisms. There needs to be a direct and implementable connection between it and the regulating mechanisms, policies, plans and other entities.
Section 1 Role of the Strategy 'How the strategy has been developed'	20	First paragraph (p20)	Addition of other new strategic investigations – <ul style="list-style-type: none"> • Introduction of new water compensated by the relinquishing of an amount of groundwater take (see paragraphs 1.4 and 1.5 of this commentary); • feasibility of augmentation of flows in specific rivers and lowland streams e.g. Selwyn River; • Restricting new groundwater take consents.
Section 1 Role of the Strategy 'Vision – what would success look like?'	20	First paragraph	The Society agrees with the stated desired outcome of the strategy.
		Second paragraph	Need to add following new bullet point – <ul style="list-style-type: none"> • The scientific methods and approaches used to determine the state of the water resources and any impacts on them by users will be relevant to the areas in question, robust and supported by a high level of known parameters.
'Principles that must be met'	21	All paragraphs under this heading.	There seems to be an emphasis on a 'consistent' approach across the region. This may simply not be appropriate between very different catchments and the pressures on the resource. Achieving the principles may be very different between zones and this should be recognised.
Section 2 Key Challenges 'Canterbury's dependence on water'	22	Paragraph 3	Last sentence needs to be amended to recognise that not all lowland streams are spring-fed. The statement at present is a mass generalisation. For instance the Irwell River in Ellesmere is considered by ECan to be a lowland stream, but it is predominantly influenced by the flows of the Selwyn River and has little to no spring-fed influences for the majority of its reach.
		Paragraph 4	Need to recognise that certain types of irrigation methods can also recharge

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'Key Issues' Pressure on river systems	24	Paragraph 1	groundwater systems, e.g. border dyke irrigation. Care needs to be taken when making general statements about the lowland streams. Not all streams are under pressure and ECan has reports which recognise that the quality of some lowland streams is actually improving. Flow levels do not always constitute a bad aquatic state. There are other factors to consider.
'Cumulative effects on ecosystems'	25	Paragraphs 1 to 4	Care needs to be taken when describing the state of the lowland streams when not all the lowland streams are monitored or have good data sets surrounding them. Sound investigation into the characteristics and parameters of these streams need to be undertaken, considered and consulted on before progressing down an ill-informed track. The quality of some lowland streams has actually improved in recent years but this information is lost in the mass generalisations made about 'all' lowland streams throughout the entire Canterbury Region. It also needs to be recognised that falling flows in streams is related to all water use in a zone/catchment and not just by some of the users in a catchment.
'Cultural health of waterways'	25	Paragraph 2	Again care needs to be taken when describing the degree to which land use changes/catchment modification is having on riparian vegetation. In a significant number of areas there has been significant development of native riparian vegetation. In a lot of cases too this is in areas where there has been no native vegetation for many decades. It is not necessarily an entirely recent phenomenon as suggested here.
Section 2 Key Challenges 'Future Trends'	27	Figure 3 – Striped Green area of Rakaia Selwyn zone	There needs to be recognition of the areas that already experience groundwater recharge via adjacent river systems and up-gradient border dyke irrigation.
Section 2 Key Challenges 'Will the current approach address the problems and deliver the desired outcomes?'	31	Paragraph 4	The current system seems to fail to manage the resource successfully. A change in direction is urgently needed in order to progress forward.
	31	Paragraph 5	The Society strongly opposes the wording of the first sentence and the reference to ' <i>pollute up to the "limit"</i> '. It is statements like this and the over-riding assumption that

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			<p>all farmers are 'bad farmers' that is unjustified, and does not add to consultative processes or building relationships. Farming practice has moved enormously and it is not that the farmers, 'pollute to the limit', so much as the limit has a sinking roof making it very hard to get in front of the game. Boggy Creek is an example where farmers have been compliant in restoration and fencing, only to be told that they were yesterday's ideas and that apart from a reduction in sedimentation nothing else has changed. A constant re-valuing of methods and strategies has resulted in the 'roof being lowered' again.</p> <p>There are already significant farming systems in the region that do operate highly efficient systems and minimise pollutants. This Strategy should be, in consideration of the other issues it deals with, viewed as a tool to invest or foster stronger relationships between the various stakeholders, communities and authorities, not a document that aims to alienate parties.</p>
<p>Section 2 Key Challenges 'Paradigm shift needed in water management'</p>	32	<p>Paragraph 1</p> <p>Paragraph 3</p> <p>Paragraph 5</p>	<p>The Society questions the emphasis on 'existing users' compared to new users in this paragraph – it renders an unnecessary indication that existing users must be singled out but for no clear reason. This bolding should be removed from this wording.</p> <p>Regulatory actions need also to be complemented by sound science and base data sets that are largely complete rather than based on generalised assumptions about only some waterways.</p> <p>This paragraph needs to be re-worded as it implies that stakeholders and the various interested parties do actually consider that ecosystems, recreation, customary uses and environmental conservation are 'add-ons'. Certainly this is not the view of the Ellesmere Irrigation Society. In fact the majority of farmers have the view that their farming systems are environmentally sound. It is not appropriate to taint this document with this type of statement which may only be the beliefs or actions of a minority.</p>
<p>Section 3 Achieving the Vision 'Options considered'</p>	34	Fourth bullet point	While the Society is not opposed directly to the transferability of permits, consideration should be given to the purpose of the transfer and whether it supports

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			the overall aim of the Strategy in terms of minimising the pressures on the groundwater and lowland stream system.
Section 3 Achieving the Vision 'Strategic approach and targets'	38	Entire page 38	<p>The Society supports the strategic approach and targets but considers that an emphasis in timing should be put on the medium to long term goals. A successful outcome in 30 years time may be too late. These goals should progress immediately and with urgency. A considerable number of groundwater take consents will require renewal in 2025 and we would hope that zone management would make the renewal of these consents or a viable alternative a relatively easy process. 0-10 years should be a more realistic goal for infrastructural projects.</p> <p>Targets should be well considered and supported appropriately by sound and accurate research and findings. To date ECan has been less than adequate in this respect.</p>
Section 4 Coordination and delivery framework 'Implementation drivers'	39	Entire page 39	The Society supports a collaborative approach.
Section 4 Coordination and delivery framework 'Regional water management'	Page 41	First bullet point	Reliability of water supply is critical to the farming operations within Ellesmere. Crops need water at critical times in order to not only be productive but survive.
Section 4 Coordination and delivery framework 'Figure 7'	Page 42	Figure 7	The Society questions the location of some of the boundaries of the proposed zones. The Waihora/Selwyn zone should have a boundary which runs along the centre line of the Rakaia River right back to the main divide. There should be more input into determining the final zone boundaries.
Section 4 Coordination and delivery framework 'Water governance structure'	Pages 44	Paragraph 6	It is extremely important that the operational authorities work in practice and that any rules, policies and objectives of relevant plans and the overriding legislation are consistent with the Canterbury Water Management Strategy. Without this consistency existing mismanagement of the water resource will continue.
Section 4 Coordination and delivery framework 'Water Executive'	Page 45	Paragraph 3	<p>It is imperative that the water governance executive is made up of highly skilled parties who have substantial experience in dealing with water management issues.</p> <p>The Society considers that the Water Executive should be an independent body, with ECan having only a regulatory function. While the Executive should have an ECan</p>

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			representative we consider that the Executive should be made up of representatives from the relevant zone and other independent parties.
Section 5 Implementation blueprint 'Ecosystem restoration'	Page 49	Paragraph 3	Add bullet points – <ul style="list-style-type: none"> • Introduction of new water compensated by the relinquishing of an amount of groundwater take (see paragraphs 1.4 and 1.5 of this commentary); • Augmentation of flows in specific rivers and lowland streams e.g. Selwyn River; • Restricting new groundwater take consents.
Section 5 Implementation blueprint 'Allocation and use of groundwater'	Page 50	Paragraph 1	The Society agrees that the taking of large amounts of groundwater from the Upper Plains is causing considerable strain on the lowland streams.
	Page 51	Paragraph 2	The last sentence in this paragraph says <i>“Farmers in the lowland areas are also suffering unreliable water supplies in dry years”</i> . This is not the case in the Ellesmere area. There is no unreliability of supply from groundwater sources in this area.
	Page 51	Paragraphs 3 and 4	The Society strongly agrees with the statements made in these paragraphs.