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Wairua farm Trust & Wairua Dairies Ltd

Submission to

The TANK Catchment Plan Change 9 Hearing Committee

1. My name is Ivan Knauf
2. Trustee of Wairua Farm Trust
3. Managing Director of Wairua Dairies Ltd
4. Wairua Dairies is a member of Ngaruroro Irrigation Society
5. I was Dairy Industry representative on the TANK Collaborative stakeholder group
6. Director of Irrigation New Zealand

Wairua Background

Wairua covers 970 ha approximately, located on the southern bank of the Ngaruroro River downstream of the Ohara Stream /Ngaruroro River confluence. The only dairy farm on the Ngaruroro River, converted to dairy 2001.

1000 mm average rainfall

A mixture of contour

430 ha dairy

balance dairy support/cropping and beef calf rearing

Fully compliant with Hawkes Bay Regional Council (HBRC) Dairy discharge consents since 2001 and gold Award winners since the inception of the awards system in 2012-2013.

We have a Farm Environment Plan in place

We have many years of nutrient budgeting

Irrigation covers 440ha irrigated

- via centre pivots & guns
- water is supplied from river takes, groundwater & on-farm storage
- irrigation gives us relative production reliability

TANK Collaborative Process

TANK was not a perfect model but contrary to some submissions, I believe the process delivered a representative Plan Change including a wide range of views from the catchment community. I urge the hearing committee members to heed the recommendations of the collaborative process as they consider submissions.

TANK Dairy Industry

Dairy covers 6000 ha of land in the catchment.

Page 29 Pol 22 Stock Exclusion – all dairy farms in the TANK catchment have stock excluded from waterways in line with Fonterra requirements.

We agree with the stock exclusion policy.

All dairy farms in this catchment have a Farm Environment Plan in place.

Page 11. Obj 15 Wetland and Lake Taonga within TANK catchment

Wairua has recently placed approximately 65 hectares into a QEII trust covenant.

Comprising 35ha of wetland (Pigsty) along with 30 ha of surrounding land.

Total area fenced is 90 hectares.

Fencing was paid for by

- Hawkes Bay Regional Council through the Jobs for Nature Partnership with the Ministry for Environment
- QEII National Trust
- Fonterra

Page 21. Pol 27. Timeframes: Water & Ecosystem Quality

Obj TANK 15 Page 11

Table 1. #4 Wetlands

- Wairua agrees that protection and restoration of existing wetlands like the Pigsty is a quick and easy way of increasing the overall area in wetland. Increasing bio - diversity at the same time as improving water quality.
- We agree with encouraging development of new wetlands

Page 28.Surface water Low Flow management

Policies: Surface Water

43. a)

We agree with the recommendation to maintain the existing low flows for the Ngaruroro River and its' tributaries.

Some reality;

During the 2012-13 drought and again in 2019-20 drought years the 2400l/sec low flow limit irrigation water was shut down for in-excess-of 50 days, causing significant crop and grass production losses.

Two thirds of Wairua surface water take is at the 5000 l/sec low flow limit which was shut off for 104 days in both drought years.

Groundwater irrigation bores also ran dry.

Stored water also ran dry.

From January to end of May Wairua received 30% of the long- term average rainfall for that period. No substantial rainfall occurred until the beginning of June.

Stock drinking water and household drinking water supplies were sourced from groundwater bores, although under enormous pressure and at very- low levels, did not run out.

To feed stock, feed had to be bought in at inflated prices.

We accept there needs to be a conservation flow maintained but that needs to be balanced against economic sustainability. We believe the recommended low flow rates are fair.

Page 30 Water Allocation - permit duration, Schedule 32

Paragraph g) Irrigation water consent durations of 15 years

We object. These consents should be issued for durations of 30 years to allow returns on substantial irrigation infrastructure investment without the risk of major changes, to give investment certainty. Marlborough has agreed to 30 year consents, there is no good reason why this could not be granted in this catchment.

Nutrient Loss / Land Use Change TANK 6 (and Schedule 29)

The baseline should be set from the average over the past five seasons OR from the average of the number of seasons N loss has been calculated.

Reason – some farms will not have a history of Nutrient budgets but some like ours have a long history

Schedule 29 Table1

I do not support the retention of schedule 29 Table 1. This table subjectively categorises land use which may not reflect the true N loss associated with a particular farm environment and this table will become the default setting.

Nor do I support the land use change restriction of 10 hectares per property – I request this is changed to "10 ha OR 10% of property or enterprise area whichever is greater". For most regions of the catchment, 10 ha land use change will have negligible effect on water quality and impose a - disproportionate cost on land - owners.

This is a perfect example of micro – management. Council staff will not have the resources to monitor at this level and even if they did it would be a waste of resources and would not be achieving what it set out to achieve , which I remind you is better water quality.

Schedule 31 Flows Levels and Allocation Limits

This schedule states that the allocation limit for the Ngaruroro River will reduce by 18% to 1300 l/sec for surface water and Zone 1.

Page 47 TANK 10 Actual and Reasonable Allocation

The quantity taken and used is the least of:

g iii) The maximum annual water use in any one year within the 10 years preceding 2 May 2020 (including as demonstrated by accurate water meter records)

We strongly disagree. This penalises those who have made significant financial commitment to develop land and build infrastructure on a long timeframe. These are the sorts of rules that destroy confidence in the business community and lead to economic stagnation.

If this rule was imposed as is, our suggestion for compensation for those who have committed to a long term development is for them to be granted or offered as compensation an equivalent quantity of high flow allocation water.

Page 29 Pol 47 Application Efficiency and Distribution Uniformity

I support the recommendation that "a definition that aligns most closely to the Irrigation New Zealand definition is included "

Glossary of Terms - Accurate Water Meter Data

We ask that a definition of accurate water meter data be included in PC9 glossary in line with the 2020 revision of the water meter regulations which requires telemetry of water use data.