

**Moutere Station Limited's Submission on Freshwater Planning Instrument Parts of
Proposed Otago Regional Policy Statement 2021**

To: Otago Regional Council

1. Name of submitter: **Moutere Station Limited.**
2. Moutere Station Limited **could not** gain an advantage in trade competition through this submission.
3. Moutere Station Limited **is** directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.
4. Moutere Station Limited **wishes** to be heard in support of this submission.
5. If others make a similar submission, Moutere Station Limited **will** consider presenting a joint case with them at a hearing. A similar submission will not include submissions from all farming systems.

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Executive summary of submission

1. We submit that, contrary to Te Mana O Te Wai, the Freshwater Planning Instrument Parts of the Proposed Otago Regional Policy Statement (FR-pORPS) will do nothing to encourage the sustainable ongoing use of the land for pastoral farming and will not protect the environmental and pastoral values of the land in Otago. The FR-pORPS puts at risk the improvements farmers have achieved towards sustainable farming methods and biodiversity of plant species.
2. Moutere Station opposes the Freshwater Planning Instrument Parts of the Proposed Otago Regional Policy Statement 2021 (pORPS) for the following reasons:
 - a. It may result in environmentally perverse outcomes which threaten the concept of Te Mana O Te Wai including the proliferation of weeds resulting in reduced access to water ways and creating a shortage of land for winter grazing which may result in expansion of paddocks used for winter grazing and have an unnecessary impact on food and fibre production. It will also like result in increased numbers of bird species, such as duck and geese, which contribute strongly to the E.Coli in the waterways.
 - b. There will be a loss of intergenerational farms in Otago to either exotic forestry or offshore ownership with the additional (unnecessary) environmental and regulatory burdens and the economic cost included in the pORPS.
 - c. The pORPS has the potential to destroy the rural community and the rural way of life that has been the cultural lifeblood of Otago for over 200 years.
3. Moutere Station's position is that the FR-pORPS must consider both environmental and economic outcomes.

Moutere Station Limited – Background

Andrew Jopp purchased Moutere Station in 1891, and his descendants have run the Station faithfully for 130 years and five generations. Today, Andrew and Harriet Jopp own and manage the Station. The Jopp family view its role as stewards (kaitiakitanga) of the land with great importance. Over the past 130 years, Moutere Station has achieved environmental and economic outcomes that Otago can be proud of.

Moutere Station is closely linked to the early pastoral history of Otago, and the development of Merino Stud breeding. Today, it is approximately 4,000ha and runs Merino Sheep and Angus Cattle.

History of improving and maintaining the health of waterways at Moutere Station

Moutere Station's water is sourced from the Hill country. It's annual rainfall is approximately 300ml, which classifies it as semi-arid environment.

Moutere Station's irrigates by way of pivot irrigation and hard hose gun irrigation. Moutere Station moved from Deemed Permits to Resource Consents in 2021.

Moutere Station is home to a population of indigenous Central Otago Roundhead Galaxias, a nationally endangered species. To maintain the population, we must exclude brown trout (a pest of the waterway). We have implemented a management program with a native fish expert to maintain and grow the rare population of Galaxias.

In Summer, our families and our staff swim in the dams and waterways that are located on Moutere Station. We have not noticed that stock have impacted the quality of the water in the dams and waterways (our stock rate is around 3su/ha) but the presence of duck, geese and swans do have a negative impact on the quality of the water for swimming.

We submit the following changes to the FP-pORPS should be adopted.

| Column 1 | Column 2 | Column 3 | Column 4 |
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| SRMR-I5 – Freshwater demand exceeds capacity in some places – Environmental | Oppose in part | The environmental snapshot fails to take into account the positive freshwater management that is currently taking place to maintain and enhance the waterways. | Freshwater abstraction can reduce water level or flow and connections between different water bodies. <u>Freshwater abstraction may also assist with maintaining the ecosystem by reducing weed and willow pressure and sustaining indigenous species. This can negatively impact ecosystems by affecting freshwater habitat size and the shape and condition of the water body, including bed, banks, margin, riparian vegetation, connections to groundwater, water chemistry (for example by increasing concentrations of pollutants), and interaction between species and their habitat.</u> How much an ecosystem is affected by taking freshwater <u>will require a consideration of the ecosystem of the farming system as a whole and may be determined by departure from existing extraction, natural flow regimes, taking into account magnitude, frequency, timing, duration and rate of change, and ecosystem capacity to recover.</u> |
| SRMR-I5 – Freshwater demand exceeds capacity in some places – Economic | Oppose in part | Irrigation needs to be based on the land use and contour. Change in the type of irrigation will not result in a positive economic outcome and in many cases may not result in any more efficiency. The cost to change the method of irrigation can rarely be economically justified. Tourism | Freshwater in the Otago region is a factor of production that directly contributes to human needs (urban water supply), agriculture (including irrigation), hydro-electric power supply, and mineral extraction. Freshwater <u>and agriculture</u> also indirectly contributes to the tourism industry through maintenance of freshwater assets for aesthetic and |

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| | | <p>also relies heavily on the aesthetic values associated with farming in Central Otago and the farming industry (for example, hunting). The benefits of exporting food and fibre sit alongside Tourism under the principle of Te Mana O Te Wai, but the values identified in National Policy Statement at appendix 1B identifies irrigation, cultivation and the production of food and fibre as a mandatory value for consideration whereas tourism is not.</p> <p>Please note that we have not included wild flood as being included in 'irrigation' because it is being phased out.</p> | <p>commercial recreational purposes. <u>Lack of freshwater will disproportionately impact agriculture and have a devastating impact on the economy in Otago. can negatively impact economic output of those industries that rely on water in the production process. To varying degrees these impacts can be mitigated through water efficiency measures and innovation. A change in the type of irrigation may result in more efficiencies but the availability to change irrigation will be limited given the land use and contour make types of irrigation more suitable to each location. At the same time other industries, such as tourism that rely on the aesthetic characteristic of rivers and lakes and agricultural land, to them and instead rely on management regimes that sustain flows and water levels suitable for their activities.</u></p> |
| SRMR-I5 – Freshwater demand exceeds capacity in some places – Social | Oppose in part | <p>Fails to adequately consider the social good that the rural communities provide in Otago. It also fails to recognise that rural communities are often disproportionately impacted by failed water infrastructure.</p> | <p>Ensuring appropriate freshwater supply for human <u>and community</u> use is available as part of planned urban growth and maintaining rural communities is essential. It is possible this may require consideration of additional freshwater storage in the future. The region's freshwater assets also support a range of recreation uses, for example camping, fishing, water sports, and swimming. These values are strongly linked to environmental values and as such, reduced environmental flows <u>may</u> have a corresponding negative impact on social and cultural values in specific areas.</p> |
| SRMR-I6 – Declining water quality has adverse effects on the environment, our communities, and the economy – Environmental | Oppose in full | <p>The statement refers to 'reports' of declining water bodies without identifying any characteristics of what is causing this degradation. Without adequate identification of the issue, there is the possibility of overreach.</p> <p>The reference to agricultural intensification again fails to separate when nitrogen and phosphorus can be applied in a manner that meets band A, B or C in the National Policy Statement. What is agricultural intensification? What stock rate are you concerned about?</p> <p>There is also going to be perverse environmental outcomes if stock are excluded from all waterways, including:</p> <p>It is not feasible on High Country Hill Country where the stock rate is less than 3 su/ha to fence of waterways due to the contour and cost of doing so.</p> <p>Reduced access to water bodies may reduce the quality of water due to proliferation of weeds in fenced and un-grazed areas.</p> <p>Shortage of land for winter grazing due to a reduction in available agricultural land may lead to more</p> | <p>Despite the region's lakes and rivers being highly valued by Otago communities, reports [insert the titles and authors of the reports and identify the particular areas or land use types of concern]. The agricultural community values the region's lakes and rei indicate there are reasons for concern about water quality and its trends with consequent potential impact on ecosystems and people.</p> <p><u>Agricultural intensification close to waterways also contributes to nutrients (nitrogen and phosphorus) leaching into underlying groundwater or running off into surface water bodies, and can <u>may</u> also increase the risk of E.coli contamination from animal waste.</u></p> <p>Add:</p> <p>Any change in agricultural use must consider that the economic health of farms depends on their environmental health – healthy waterways, healthy pastures, healthy animals contribute to more production and a more positive market image for local and foreign buyers. Any regulation must recognise that farmers have maintained the healthy waterways for many generations but there are some areas for improvement, notably [insert specific land use concerns and areas that have higher rates of E.Coli]. The Council</p> |

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| | | <p>intense wintering and cropping on available land, animal welfare issues concerning feed and shelter, and more transporting of stock around the country.</p> <p>Increase in conversions of farm land to exotic forestry resulting in changes in hydrology, loss of ecosystem services.</p> <p>The loss of family-owned, inter-generational farms to corporate-owned farms which potentially could result in more intensive farming practices.</p> <p>Increased regulatory burden resulting in increased mental health issues for farmers.</p> <p>Many of these outcomes could result in decimated rural communities and economies.</p> | <p>recognises that it is beneficial for the landowner to take responsibility for maintaining and improving healthy waterways on their farm at a reasonable rate.</p> |
| SRMR-I6 – Declining water quality has adverse effects on the environment, our communities, and the economy – Economic | Oppose in part | <p>This fails to identify the economic benefits of utilising nitrogen and phosphorous on production and economic output in Otago and that for many low stock farms use of fertiliser and healthy waterways go hand in hand.</p> <p>This also fails to identify that in Ozanne's report, nitrogen levels in Otago waterways were above the National Bottom Line.</p> | <p>Water pollution (from nutrients, chemicals, pathogens and sediment) can <u>can [identify the specific locations in Otago] may</u> have far-reaching effects potentially impacting <u>rural communities, agriculture, tourism, property values, commercial fishing, recreational businesses, and many other sectors that depend on clean water.</u> These impacts can be direct (varying the quality of primary production outputs such as fish <u>or unhealthy stock</u>); increasing costs of production through mitigation or remediation costs (drinking water treatment cost, riparian restoration); loss of enjoyment and benefit from tourism uses, and indirect such as cost to human health and associated medical costs, or reduction in brand value (e.g. Brand New Zealand). <u>Low stock rate farming systems are unique and it is acknowledged that they can maintain and improve water quality. The economic impact as a result of any decreased application of nutrients and therefore decreased production will also have far reaching effects, including tourism, farm values, agricultural output, exports, recreational hunting, and the large percentage of the population that rely on agriculture for employment.</u></p> |
| RMIA-WAI-I1 – The loss and degradation of water resources through drainage, abstraction, pollution, and damming has resulted in material and cultural deprivation for Kāi Tahu ki Otago | Oppose in part | <p>Incorrect assumptions have been made that all actions described have a negative impact on Kāi Tahu. It is also incorrect to posit that whānau have had to switch to exotic species such as trout and salmon. Either mahika kai values are going to be protected or they aren't. ORC cannot carve out particular aspects to suit certain syndicates of society.</p> <p>The concept of Ki Uta Ki Tai should be adopted to recognise each unique ecosystem as this is</p> | <p>The drainage of wetlands, water abstraction, degraded water quality, barriers to fish passage and changes to flow regimes as a result of damming have had significant negative impacts on Kāi Tahu <u>in the following areas [list the areas of concern for Kāi Tahu].</u> These activities <u>may</u> degrade the mauri of the water and the habitats and species it supports, therefore also degrading mahika kai and taoka species and places. These changes to the environment have meant that Kāi Tahu have had to adapt and change their use of the environment. As traditional mahika kai places and species</p> |

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| | | a fundamental policy in the National Freshwater Policy. | have declined, mahika kai must now be carried out in artificial habitats such as reservoirs, and whānau have had to switch to exotic species such as trout and salmon. The mātauraka associated with traditional mahika kai species and places cannot be passed on, and the intergenerational transfer of knowledge that has occurred for over 800 years is broken. Place names that carry tribal history are no longer reflective of their places – for example no one would now claim that the Waiareka is 'sweet water' to drink. However, in some areas, <u>multi-generational farmers have strengthened the traditional mahika kai species and farm in a manner that respects Ki Uta Ki Kai. Discretion is needed to ensure that work performed to protect indigenous species is not decimated by lumping all farms together and imposing blanket rules. The landowners must be in charge of the decisions that are made on their land, within a rational and clear policy framework.</u> |
| LF-VM – Visions and management | Amend | The Visions and management across all FMU/Rohe's is amended to align with the National Policy Statement which identifies that irrigation, cultivation and food and fibre production is a mandatory value for consideration | |
| LF-VM-O2 (5) | Amend | Not all indigenous species need to migrate and movement of other non-indigenous species could have a detrimental effect on those indigenous species we are seeking to protect like the population of Central Otago roundhead Galaxias on Moutere Station. | <u>where required to complete their lifecycle</u> indigenous species migrate easily and as naturally as possible along and within the river system |
| LF-VM-O2 7 (b) (ii) | Amend | Moutere Station produces sheep meat and beef but also produces some of the most sustainable (carbon neutral) wool fibre in the world. We believe that the production of fibre should be recognised as important alongside that of food production | Innovative and sustainable land and water management practices support food <u>and fibre</u> production in the area and... |
| LF-VM-O2 7 (b) (iii) | Amend | Sustainable abstraction can continue from tributaries | Sustainable abstraction occurs from main stems or groundwater in preference to tributaries <u>where practicable</u> |
| LF-FW-O8 (2) | Amend | Continuous water flow could provide for the movement of non-native fish at the detriment of non-migratory indigenous species | <u>where appropriate</u> water flow is continuous throughout the whole system |
| LF-FW-O8 (4) | Amend | Not all native fish need to migrate and this objective could provide for the movement of non-native fish at the detriment of non-migratory indigenous species | <u>Where appropriate</u> native fish can migrate easily and as naturally as possible.... |
| LF-FW-P7 | Amend | Providing for fish passage could cause non-native fish movement which could be at the detriment of some indigenous fish species | the habitats of indigenous species associated with water bodies are protected, <u>including by providing for fish passage</u> |
| LF-FW-P7 Fresh water | Oppose in part | It refers to phasing out existing over-allocation. Given the potential for this to have a direct impact on the social, economic and cultural values in Otago, greater clarity is required. This will | Amend (5) existing over-allocation [<u>identify particular location</u>] is <u>phased out and future over-allocation is avoided, and reduced based on the [following principles]</u> insofar as it does not have a |

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| | | require further research prior to implementing. | <u>negative impact on production in the food and fibre sector.</u> |
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