

**BEFORE THE COMMISSIONERS APPOINTED ON BEHALF OF THE
OTAGO REGIONAL COUNCIL**

UNDER The Resource Management Act 1991
(the **Act** or **RMA**)

**IN THE
MATTER** of an original submission on the
Proposed Regional Policy Statement
for Otago 2021 (**PRPS**)

BETWEEN **OTAGO WATER RESOURCE USER
GROUP**

Submitter OS00235 and FS00235

FEDERATED FARMERS NZ INC

Submitter OS00239 and FS00239

DAIRY NZ

Submitter FS00601

AND **OTAGO REGIONAL COUNCIL**

Local Authority

SUMMARY OF EVIDENCE OF SUSAN MCKEAGUE

DATED 2 MAY 2023



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Summary of evidence

1. My name is Susan McKeague, I am an environmental farm consultant. I have worked with farming families as an Advisor, Landcare co-ordinator, Facilitator, Land Resource Officer by the Otago Regional Council, and Consultant for over 30 years. I refer you to the expertise and experience outlined in my evidence.¹
2. The purpose of my evidence is to explain the complexity of achieving change to farming systems and the need for long transition periods where land and water use change is anticipated through changes in policy.
3. Although this evidence relates to the non-freshwater provisions, there are many challenges in achieving change regarding water, land use and on farm and catchment management. An RPS needs to be clear in the goals or visions and provide suitable transition periods.

Irrigation in Otago

4. Over the past decades, the dry catchments of Otago have established collective water management. Irrigators, companies, and catchment communities all cooperate to share the scarce resource.² These sharing regimes have included consideration and implementation of environmental flows for rivers.
5. For example, water users in Central Otago have established protocols and infrastructure for flow sharing during dry periods. Water storage, distribution, and application infrastructure is the result of a century of investment and of trial and error.³

Irrigation problems are complex

6. Irrigation systems require time to plan and implement.⁴ The schemes and companies involved are complex, interconnected and cannot be

¹ At [1]-[7].

² At [12].

³ At [56].

⁴ At [10].

altered quickly or cheaply.⁵ Alterations to these systems will take time to design, introduce and to re-establish protocols.⁶

7. Farming system change is unavoidably complex and slow.⁷
8. It is unclear in the PRPS exactly what change is required to achieve the FMU visions. This makes it difficult to assess if the vision is sensible for the rohe and/or achievable. As a result, it is impossible to predict how long change will take to implement.⁸
9. An example comes from the Manuherekia catchment. The vision to favour main stem or groundwater abstraction over tributaries is not practical or needed.⁹
10. The rules need to be practical and align with the realities of what can be done on the ground. For example, in the Paerau-Waipiaata flow sharing group in the Taieri catchment, flow down the river has taken many years to understand.¹⁰ Farmers have worked to respond to signals from the regulatory body and the community. Adapting their businesses further to big changes or having to undo the changes they have recently made will take time and money.

What are we asking for?

11. Water users are aware that change is necessary. In many cases (like Manuherekia) these users have been proactively seeking further understanding and options to deliver to the values of the catchments.¹¹
12. However, if big changes are required then the complexity of water access and flow sharing means long timeframes are needed. The RPS needs to acknowledge this to ensure that the Land and Water Regional Plan is not set up to fail by having to implement unachievable goals.¹²

⁵ At [11].

⁶ At [12].

⁷ At [56].

⁸ At [14].

⁹ At [15].

¹⁰ At [30].

¹¹ At [57].

¹² At [57].

13. For farming businesses to adapt, clear visions and goals are required. These must be achievable and hold steady over time.¹³
14. **I would be happy to take any of the Panel's questions.**

Dated 2 May 2023

Susan Mckeague

¹³ At [13].