



# Federated Farmers of New Zealand

Submission to Otago Regional Council on the Lindis Catchment Group  
Incorporated Resource Consent Applications RM17.301.01 – RM17.301.19

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To: Otago Regional Council

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This is a submission on an application from Lindis Catchment Group Incorporated for resource consents (Application Number RM17.301.01 – RM17.301.19) as described below:

1. Water permits to take and use surface water
2. Land use consent to construct bores
3. Water permits to take and use groundwater (connected to surface water)
4. Water permits to take and use groundwater
5. Transfer of interest in permits, including 'owner' of permit and location of permit

**Federated Farmers supports the application.**

**We do not wish to be heard in support of our Submission.**

**Our submission relates to all of the above Resource Consent Applications.**

**Federated Farmers seeks that the Resource Consent Applications are approved.**

## **Our Submissions**

Federated Farmers of NZ has been involved throughout the Plan Change 5A (Lindis Integrated Water Management) plan change process.

We submitted and further submitted to the proposed plan, presented hearing evidence to it, joined the appeal lodged to the Environment Court as an interested party in support of the appellants and attended Environment Court mediation in this regard.

We have been kept up-to-date throughout the subsequent process and are aware of the rationale behind the decision to ultimately have the Environment Court concurrently consider both the appeal on the plan change, and the application currently at issue.

We appreciate the significant time, money and resources the applicants have put into the current application in order to strike a balance between environmental, social, cultural and economic concerns.

Ultimately, we support the application to replace permits to take and use water in the Lindis catchment.

We consider the supporting information and the proposal in its entirety justifies a summer minimum flow of 550 L/sec being set at the ORC's Ardgour Road flow site. We understand that impacted water users have agreed to the disestablishment of 4 large race intakes alongside a subsequent establishment of shallow bores in the Lindis Ribbon Aquifer to replace a portion of those allocations. We are satisfied that the subsequent rearrangement of takes will significantly enhance flows in the reaches of the Lindis River currently most affected by abstraction.

We have considered the information provided with the application at length and we are satisfied that the current proposal will result in a greater reduction in allocation than if the minimum flow was set at the 900 L/sec as per the Council decision on Plan Change 5A.

We understand that the application seeks to replace 26 permits to take and use water (surface and groundwater) in the Lindis catchment and that this will result in very significant reduction in abstraction of primary allocation water from the Lindis catchment.

The catchment has previously been identified as culturally significant from a mahika kai perspective, and we note that these values will be enhanced and provided for by this proposal.

We are satisfied that the supporting information indicates that the extent and duration of low flows will be significantly reduced, and connectivity with the Clutha River will be maintained through the implementation of a minimum flow. This will ensure the life-sustaining capacity of the Lindis catchment will be maintained and improved for a wide range of ecological values.

Despite concerns previously raised by the Fish and Game Council, we consider the application indicates that habitat values for trout will be improved throughout the main-stem, with particular gains in the reach above the Ardgour Bridge due to the disestablishment of the main race intakes.

We note that habitat for galaxiids will be maintained in the limited areas where sustainable populations of this species is present, however, on-going, active management will be required to ensure these populations are protected from trout. We support the further enhancement of these populations through active management actions.

From an economic perspective, we consider that the replacement of these permits will enable farming businesses to continue to remain viable, despite the inevitable negative impact on the economic and social effects on the catchment of a reduced reliability of supply. We support the pragmatic acceptance of the applicants that some economic loss is necessary in order to provide for and enhance the life-supporting capacity of the Lindis catchment.

We strongly agree with the application that any decision to not replace these permits would have a significant adverse economic and social effects on the applicants and the local community, with flow on effects for the region. We agree that without this access to water, many of the impacted farms would no longer be economically viable.

In particular, from an economic impact perspective we note and agree with the position at page 5 of the application that a minimum flow of greater than 550 L/sec:

*“will result in a reliability of supply of irrigation water that is too low to enable effective use of the efficient irrigation infrastructure already in place and expenditure on the significant changes to irrigation infrastructure that will be required if the races are disestablished”.*

We therefore support the approval of the application. We are satisfied that it will result in significant enhancement to the current in-stream ecological values and natural character of the Lindis River and will sustain a healthy eco-system and life-supporting capacity within the catchment. We are satisfied that it will also result in the enhancement of cultural, amenity and recreational values.