

SUBMISSION ON HAWKE'S BAY REGIONAL COUNCIL'S PROPOSED STATE OF ENVIRONMENT WATER CHARGES

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Background to Irrigation New Zealand

INZ (Irrigation New Zealand Incorporated) is a national body that promotes excellence in irrigation development and efficient water management throughout NZ (New Zealand), based on the principles of responsible and sustainable management of water resources. INZ is a national organisation that represents the interests of 3,500 irrigators totaling 350,000ha of irrigation (approximately 50% of NZ's irrigated area). All the key irrigation service providers (trade and consultants) are also members.

State of the Environment Water Charges

INZ accepts that consent holders need to be held accountable for a proportion of HBRC's (Hawke's Bay Regional Council's) SOE (State of Environment) investigation and monitoring costs.

INZ has analysed the cost split and apportioning methodologies used by HBRC and finds these acceptable.

For the regional versus zone based approach, INZ recommends that the regional approach should be adopted for Hawke's Bay as -

1. This avoids the current and future cost burden anomalies that will be created in areas with few consents and little resource information
2. There needs to be recognition that for some areas, particularly the Heretaunga plain, the general rate has funded much historical investigation

However, INZ opposes HBRC's proposed SoE (State of the Environment) Water Charges as -

1. Direct charges must be accompanied by increased stakeholder input into monitoring and investigative programs. This will ensure accountability surrounding the increased costs, specifically for program content, budgets, timely delivery and improved data provision. An 'accountability working group' needs to be established consisting of grower representatives. This group would –

- a. Give prioritised direction and focus to Council's monitoring and investigation programs
 - b. Better align Council monitoring and investigation programs with consent holder needs (market compliance reporting and better targeted investigations)
 - c. Advise and make Council aware of historical investigative work. Growers often have detailed knowledge of past investigations that are can be overlooked as a result of Council staff turnover
2. The number of separate 'small' charges being placed upon consent holders is increasing, for example, water meters, minimum flows and now SOE monitoring. These charges need to be amalgamated into one invoice with a clear breakdown of each. Such an approach will keep Council better informed of the level of compliance charges being imposed on consent holders, and thus help to ensure charges remain appropriate and the increasing cost burden is understood.

If these factors are adequately addressed, INZ will give its support to the proposed State of the Environment Water Charges.

INZ Submission Ends