IRRIGATION
NEW ZEALAND

2023 Briefing to Incoming Ministers












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The Current State

Since the last Labour Government wound down Crown Irrigation Investments in April 2018 and introduced the Essential Freshwater reforms also in 2018, the impression given by them has been that water storage and irrigation are non-essential for New Zealand, and even more so – believed to be detrimental.

As a result, policy from across agencies has been written within this context. While historically policy for water for productive use has been driven by the Ministry for Primary Industries (MPI), over the last six years it has been the focus of the Ministry for the Environment (MfE).

The direction of travel set by the most recent Government has significantly impacted how regional councils interpret resource (particularly water) management with significant knock-on effects on the primary sector. It has also diminished the value of water storage as part of the country's infrastructure and as an enabler in achieving the climate change work programmes[1].

When MPI launched its ten-year strategy in 2020, water storage was first in line as a 'Transformational Opportunity' to "give farmers access to higher value land use options, product supply chains, and higher employment. This work will include ensuring that regulatory settings support investment in water capture projects. Improved water storage and security is key to business and community resilience as it enables farmers and growers to diversify and reduces exposure to drought and climate change events."

However, despite this positive intent, we have seen little thus far in the planning or coordination to achieve water security and availability from MPI, who have had a very small group with a limited budget working on the programme, with little momentum and minimal influence on other agencies[2].

We believe that the narrow view of freshwater management by the Government has,

a. left the country vulnerable to droughts and floods.

b. led to significant missed opportunities for;
- diversification of land use,
- developing a wider range of value-add trade products,
- reducing greenhouse gases,
- localised hydroelectricity generation,
- drinking water security, and
- water security for industrial use.

With multiple agencies working on intersecting and often the same components of freshwater, there is a lack of coordination, and a lack of vision, and therefore no strategy for water capture, storage, or productive use, or the country's resilience to climate change, changing production, and land use change. Different agencies enforcing components of the capture, storage, and use of water has led to a lack of direction, coherence, and consistency regarding freshwater policy. This often leads regional councils to interpret and implement rules that are not practical or have unintended negative consequences. As an example, the general message of the MPI Water Availability and Secuity report is that reliable food production needs additional water storage including the reliability of supply from small on farm dams. However, the onerous MBIE Dam Safety Regulations make adhering to rules primarily designed for large hydro dams unreasonably complex and costly, exacerbated by a lack of recognised dam engineers available to farmers.

IrrigationNZ currently work with a range of Government agencies all enforcing components of the capture, storage and use of water. A table with an overview of the agencies that currently intersect with the irrigation sector is in Addendum 1.

1. Noting that under the 2017 Coalition Government, NZ First progressed the development of the Te Tai Tokerau Water Storage Project in Northland via the Provincial Growth Fund. See case study in addendums.

2. The intent of the MPI Water Availability and Security initiative is sound: "Secure water supplies support positive environmental outcomes, helps communities to build resilience to climate change, contribute to the development of high-value food and fibres, and stimulates Māori and regional economies." A 2021 report commissioned by MPI as part of this identified regions with the greatest potential to grow the food and fibre sector through water. They are Northland, Waikato, Bay of Plenty, Gisborne, Hawke's Bay, Otago, Greater Wellington, Tasman, and Manawatū-Whanganui. The report recommended MPI establish a Water Availability and Security Partnership comprised of central and local government, iwi/Māori, food and fibre sector organisations, science providers, and community interest groups. This group develops an action plan and business case for the design and implementation of a national water availability and security strategic approach.

What's Needed

Enact the promised policies

We appreciate the work that has gone into the National Party's Primary Sector Growth Plan to deliver on climate change and unleash investment and growth; the ACT Party's support for less regulation allowing for more practical outcomes-based solutions; as well as New Zealand First's championing of regional economic development through water storage.

We are pleased to see there is a pathway for water for productive use across the new Government and we want to work with you to achieve the sustainability, economic growth, and community outcomes this can lead to.

Particularly we support and advocate for:

- Making water storage on farmland a permitted activity by introducing a National Environmental Standard (NES) for Water Storage within limits.
- Requiring local government to approve or decline consents for other types of water storage within two years of an application.
- Providing consent(s) for water storage to last at least 30 years to provide certainty.
- Introducing a fast-track consenting regime
- Efforts to increase renewable energy production where appropriate with water storage projects.

These are positive initiatives.

However, we believe that New Zealand urgently requires a high-level strategic approach and plan to fresh-water management which aligns with a 'new' Resource Management Act (RMA)[3]. For example, it is great to insist councils make consent decisions for water storage within two years, but without strategic direction at a national and regional level these projects are still likely to fall over as we saw in the Wairarapa and Hawke's Bay recently.

We are hopeful the announced Regional Development Fund will support initiatives such as these that have significant regional benefits for the whole community as evidenced by the Tai Tokerau Water Scheme from the last Provincial Growth Fund (PGF).

3. And other acts as necessary where overlaps exist, such as CDEM Act, Building Act, etc, as currently we have the issue that only MfE issues NPS and NES under the RMA, and other policies do not have the same enabling Acts available to them – so it becomes a 'cap in hand' to MfE to get anything changed.

Go further to build a strategy and make water a critical priority

Water is the number one enabler for food production, regional growth and thriving communities, and therefore needs to be treated as such by the government.

Our suggestion is to build on what has been developed in the National's Primary Sector Growth Plan to strategically approach freshwater management in a fair, long-term, strategic, prudent, and effective way with cross-party support.

- Establish a Minister responsible for water to provide the direction of travel from the highest level, with climate adaptability and resilience as its foundation. The Minister will have cross-agency accountability to bring the components together and drive the strategy, rather than another ministry.
- Off the back of the work done by the Water and Availability Group in MPI, reestablish feasibility work for water storage projects in high-need areas focused on producing food such as in the Wairarapa, East Coast, Hawke's Bay, and Otago, with the use of a fast-track consenting process to progress these. There are many projects that with tweaks and support could begin immediately under a fast-track approach (as provided in Addenda 2–5).
- Establish an intergovernmental agency group that includes industry and regional development agencies which is tasked with setting a strategy and implementation plan for freshwater management, incorporating: healthy waterways and groundwater, drinking water, water for industrial use, hydro, irrigation water, water takes/allocation, and a Te Ao Māori view of freshwater. This should be underpinned by climate adaptability and resilience and achieving a balance regarding what freshwater means to New Zealanders, and for New Zealand's environment, wellbeing, and economy. Resulting policy should be about intent and certainty with a consistent, coordinated approach that encourages private investment and genuinely benefits the community.
- Ensure project opportunities are guided by community leadership and supported by regional government, aligning with a nationally set strategic approach and investment. It provides local governments with a clear directive, requiring them to spearhead implementation and allocating resources in a manner consistent with the national priorities.
- Commission a report similar to the **NZIER report from 2014** on the economic and social value of water, incorporating multi-use and multiple benefits across a broader set of indicators.
- Support investment in water projects by creating a fund for feasibility studies and financial bridging (loan) support for community water projects that meet established criteria[4]. This funding could sit within the regional development fund with clear regional outcomes.
- Insist on the efficiency of all water uses and transparency of water use as part of catchment level freshwater outcomes, which include urban and non-productive use. We strongly urge the government to enhance funding support for vocational education in freshwater management and best practices in irrigation within the agricultural sector but also outside it. This support of targeted programmes will enable land owners, councils and recreational users to balance economic and environmental outcomes.
- Demonstrate to the public the importance of agriculture to New Zealand's well-being and economy. Supporting water in productive use improves farmers and growers resilience, supports a move to more plant growth, supports food security, and demonstrates climate change adaptation by de-risking their farms and orchards while also improving regional economic outcomes. Do this through communicating the opportunities, highlighting the successes and promoting the outcomes – e.g. Waimea and Tai Tokerau – and linking this back to the cost of living (more local fruit and vegetables produced), jobs in the community, development opportunities for Māori land, and how water storage will help with flood and drought management into the future.

These suggestions are consistent with **IrrigationNZ's 2023 Election Manifesto**.

4. In our view, the Crown Irrigation Investment Ltd model did not always work. Lending was done on less favourable terms than banks could provide, and expecting last in first out to have a good ROI for govt meant nothing was going to meet their criteria. Our view is that the Provincial Growth Fund (PGF)/Kānoa option is a better model, or the previous Irrigation Acceleration Fund within MPI in conjunction with an updated Irrigation Development Good Practice Guide, to assist projects getting 'investment ready'.

Water for All – proposed 100-Day plan

To hit the ground running, invigorate the regions, and provide certainty and support for growing food, 'below is a suggested proposed 100-day plan that supports the growing of food, supports local investment, job creation, and pride in agriculture, while also supporting environmental outcomes and climate change resilience.

This can be accomplished with a clear strategy, positive policy pathways, and giving people hope through setting a clear direction of travel quickly, and with intent.

- Announce a Minister responsible for water as soon as possible. This could be an additional role for the Minister for Resources.
- Appoint a small team responsible to the Minister to pull together the strategic plan and coordinate the across-agency work programme.
- Create a cross-agency group responsible to the Minister that brings together all water application and water use assets and groups (see Addendum 1 as a guide).
- Announce and commence work on a strategic review and approach for all water assets for New Zealand, utilising previous reports from NIWA, MPI, Taumata Arowai, Kānoa, and Te Waihanga.
- Implement the policy promises from the election and start drafting required changes to legislation with practical support from industry and NGOs and Māori – RMA, Climate Change Adaptation, Spatial Planning, etc.
- Commission the Economic Impact report on Irrigation with regional analysis to support the strategic plan.
- Develop a fast fast-track consenting approach and funding investment vehicle to support investment-ready projects. (Options already exist at Kānoa and MfE that can be brought back to life/adapted).
- Urgently review the implementation timing of the Dam Safety Regulations scheduled to take effect May 2024 in relation to all farm dams and irrigation canals in respect to the lack of capacity of recognised dam engineers (currently 13) and the significant gap in the national dam inventory that has not accounted for the quantity of rural dams.
- Offer ready-to-go water storage projects a fast-tracked application process – focus on the regional areas identified as under most need for fruit, vegetable, viticulture, and arable development. As per case studies from Hawke's Bay, East Coast, Wairarapa, and Central Otago, (see Addenda 2–5) where they have community, regional, and food security development opportunities and already have regional government support. (Process already set up and used for Tai Tokerau Water, for example).
- Further, request private water storage projects that are already being considered to apply to be included in the strategy so we can see where support is needed or gaps to be filled, particularly when climate change adaptation and resilience is key, – e.g. Central Plains Water and MHV Water/Ashburton Lyndhurst Irrigation water storage projects – so they can see a clear consenting pathway and options for support to reduce reliance on water bodies.
- Complete and then socialise the Water Strategy and the plan with the affected communities and sectors to get buy in and ensure they form part of the regional planning process (either under old RMA or new NBEA plans).

ADDENDUM 1

Overview of the agencies that currently touch on the irrigation sector:

Ministry for the Environment

Natural and Built Environment Act

- National Planning Framework

Resource management

- National Policy Statement for Freshwater
- National Environmental Standards for Freshwater
- NES Drinking Water
- NPS-HPL
- NPS-UD
- NES Plantation Forestry

Climate Change Work Programme

- Managed retreat (Climate Adaptation Bill)
- National Adaptation Plan (see Te Waihanga)
- Emissions Reduction Plan

Ministry for Primary Industries

- Water Availability and Security programme
- Fit for a Better World
- On Farm Support
- Integrated Farm Planning
- National Adverse Event Committee – El Niño 2023/24

Stats NZ

- Agricultural Production Survey and Agricultural Production Census changes to data questions
- Co-Author with MfE of Annual Environmental report

Ministry for Business, Innovation and Employment

- Kānoa
- Dam Safety Regulations
- Future Pathways redesign of research science and innovation funding
- Renewable energy strategies
- EECA pumps energy efficiency reporting

Te Waihanga Infrastructure Commission

- National Adaptation Plan – Infrastructure chapter
- With NEMA National Disaster Resilience Strategy – Water Security

Department of Prime Minster and Cabinet (DPMC)

- Critical infrastructure risk assessment – includes water for irrigation infrastructure

Te Puni Kōkiri

- Cadet programme related to supporting Māori in irrigation skills training

Te Pukenga and Workforce Development Councils

- Restructure of rural skills-based training delivery and competency standards including irrigation

Department of Internal Affairs

- Water Services Reforms

Taumata Arowai

- Drinking water regulations and acceptable solutions for small rural communities

ADDENDUM 2

Case study: Te Tai Tokerau

In late 2014, the council allocated $75,000 from the IGR to undertake a 'Northland Strategic Irrigation Infrastructure Study', with a matching contribution from the Ministry for Primary Industries Irrigation Acceleration Fund. The purpose of the study was to undertake a high-level, region-wide study to identify the opportunity for irrigated agriculture to contribute to Northland's economic development. This work was also included in the Tai Tokerau Northland Economic Action Plan given the potential of irrigation infrastructure to lift the region's performance.

A key finding of the study was that further detailed work should focus on two 'clusters' – one in the region's mid-North (containing the Kaikohe, Kerikeri, and Waimate North areas) and the other to the south in Kaipara (containing North Kaipara and Ruawai). Another important conclusion reached in the report was that other uses, such as public drinking supply and industrial demand, may be key to making a community-based water storage scheme economically viable.

Following on from the Northland Strategic Irrigation Infrastructure Study, the council commissioned a consortium led by Opus International to scope up some irrigation scheme options in the Kaipara and Mid-North cluster areas. This project was funded by a $165,000 contribution from the council's IGR, with a matching contribution from Crown Irrigation Investments Limited.

The study, completed in July 2017, developed four scheme options: one in Kaipara and three in the mid-North area. All would require public investment.

The Te Tai Tokerau Water Trust was established for the purpose of progressing the Northland Water Storage & Use Project from feasibility into implementation. It initially consisted of two separate water supply options developed in parallel: in the Mid North in and around Kaikohe, and along the Pouto Peninsula southwest of Dargaville, in the Kaipara.

Its objective is to create the infrastructure needed to promote sustainable land-use change which will in turn lift the prosperity of local communities, particularly for owners of Māori freehold land. Development of the scheme is expected to lift employment per annum by 12 percent in the Mid-North and 5 percent in the Kaipara. Development of both schemes would allow for approximately 7,000 hectares of new irrigable land, an almost 50 percent increase in Northland's current area under horticultural production.

The Trust received $67.5 million in funding assistance from the Provincial Growth Fund to develop the schemes.

Source: www.nrc.govt.nz/your-council/economic-development/water-storage-and-use-project

ADDENDUM 3

Case study: Wairarapa, growing need to improve water resilience

In Wairarapa, the efforts to establish some form of water storage predominantly for improving the reliability of irrigated land use began in 2000 and generated several technical reports and business models.

The most recent phase saw the formation of Wairarapa Water Ltd in (WWL) 2017. WWL was designed to get the project through consenting, supply contracts, and commissioning of the necessary infrastructure. It received funding from the Central Government (PGF), Regional and Local Government, and the private sector.

However, WWL decided to cease work on the project in August 2021 as there was no clear consenting pathway and the time it would take to create one was un-fundable.

THE DRIVERS REMAIN

The fundamental drivers for change in Wairarapa remain in place and in some cases become more urgent with the passage of time.

As a food and fibre industry-based region that also has growth prospects related to population growth and visitor-based developments, the ability to meet the water needs of any or all these opportunities is paramount.

In 2021 an updated version of the Wairarapa Water Resilience Strategy was released. This strategy was born out of a community-wide engagement process and describes a suite of activities, including storage, that can improve the resilience of Wairarapa through water management.

THE OPPORTUNITY

The new Government could signal that they understand the issues and are willing to change current processes with some urgency to remove roadblocks to enabling our Food and Fibre producers to continue to be the foundation of the New Zealand economy.

Specifically, the actions should include:

- Reinstate an “investigations fund” much like the Irrigation Acceleration Fund.
- Introduce a fast-track consenting process that is available to vital infrastructure projects. Consents granted under this provision have a 50-year time period.
- Ensure that environmental and Economic factors are given equal weight in consent deliberations.
- Provide access to low-interest financing via Government borrowing channels.

ADDENDUM 4

Case study: Tukituki Water Security Project – a blueprint for resilience in Hawke's Bay

BACKGROUND

In the face of unprecedented climate challenges, the Hawke's Bay region is grappling with a water crisis, magnified by consecutive dry years and exacerbated by the recent impact of Cyclone Gabrielle. The Tukituki River, a lifeline for the region, faces diminishing flows during critical periods, threatening both the environment and the well-being of its residents. Recognising the urgency of the situation, the Tukituki Water Security Project (TWSP) was initiated in May 2020 to address strategically important environment, water, and health issues within Hawke's Bay, create jobs, fast-track adaptation in response to climate change, and develop the most environmentally friendly water security strategy in New Zealand.

PROJECT OBJECTIVES AND SCOPE

The TWSP is a comprehensive, whole-of-catchment initiative designed to restore the Tukituki catchment's health and embeds the principles of Te Mana o te Wai. With a focus on climate change adaptation, the project aims to enhance water use efficiency, improve water security, and promote higher-value food production, creating jobs and prosperity for the Hawke's Bay region.

KEY PRIORITIES

The project, grounded in environmental stewardship, has identified priorities aligned with Te Mana o te Wai, including water restoration flows, environmental remediation, maintaining river flows, improving water quality, and addressing community needs. The TWSP Steering Group emphasises collaboration with Mana Whenua, advocating for co-design, co-governance, and co-management frameworks.

VIABILITY AND CONSENT FRAMEWORK

The project's viability is supported by existing consents, with additional consents required for specific environmental flows. The Makaroro Storage Site (MSS) remains a viable catchment-scale solution, providing meaningful water flows for productive and environmental restoration purposes. Talks with Mana Whenua to establish equal partnerships are ongoing, acknowledging the historical significance of the Tukituki River and its tributaries.

IMPLEMENTATION PLAN

The TWSP outlines a clear roadmap, including partnering with Mana Whenua, defining environmental priorities, engaging the community to build trust for consents, addressing conservation land issues, and ensuring compliance with policy settings. The project aims to pass a Local Bill within 12 months, securing local and regional authority support.

CONCLUSION

The Tukituki Water Security Project is a holistic response to the region's water challenges. There is a clear shortage of water in the Tukituki catchment at critical times, threatening Te Mana o te Wai, reducing options for environmental remediation, and placing the health of the river and its people at risk. All sources of water are either fully allocated or have only a small amount of water available at peak flow periods. While there is no silver bullet for water security in the Tukituki catchment, a combination of measures will be required to improve water security, but capturing and storing water during peak flows must be part of the solution.

ADDENDUM 5

Case study: Falls Dam, Central Otago

The Falls Dam project in the Manuherikia and Ida Valley catchments of Central Otago, New Zealand, addresses the growing demand for water resources to support agriculture and horticulture in the region. The project's primary objective is to enhance water storage capacity and reliability, offering a sustainable solution for the farming and orchard industries in the Manuherikia Valley.

The proposed options for the Falls Dam project include among other considerations either raising the existing dam or constructing a new, higher dam. The costs for these options have been estimated during previous engineering investigations. While initial funding for the project had been secured, through support from the previous Crown Irrigation Investments entity, there is a need to revisit support from local farmers who have a real interest in the project succeeding.

The project in its last iteration was spearheaded by a specific vehicle, a unified legal entity representing independent irrigation companies in the valley. The Manuherikia Catchment Water Strategy Group, which initiated the project, is expected to take a key interest in the decision-making stages as the project progresses.

In the context of an overall regional water resource allocation framework, the Falls Dam project aligns with the dual objectives of supporting environmental flows and facilitating productive water use. The increased storage capacity would enhance the resilience of the local agricultural sector, particularly during periods of drought or water scarcity.

Additionally, the project aims to balance the needs of the environment by ensuring adequate water flows for ecological health.

The implementation pathway involves a comprehensive reassessment of the environmental impact, a cost-benefit analysis, stakeholder engagement, and importantly refreshed engineering feasibility options studies. Environmental considerations will be crucial in determining the preferred option, with careful attention to minimizing ecological disruption. The collaborative approach between the development vehicle and local stakeholders will help ensure that the project addresses both economic and environmental concerns.

The Falls Dam project presents a strategic solution to the water resource challenges in the Manuherikia and Ida Valley catchments. Through careful consideration of environmental, economic, and social factors, the project aims to achieve a balance that supports both sustainable agriculture and the preservation of natural ecosystems.

ADDENDUM 6

Further information

IrrigationNZ has had extensive discussions with the Te Waihanga Infrastructure Commission on the irrigation sector's role and has received acknowledgment that irrigation infrastructure is under-represented in national-level policies on resilience and climate change adaptation.

IrrigationNZ is working with MPI to develop a brief to update the New Zealand Institute of Economic Research (NZIER) 2014 report to reflect the role irrigated agriculture plays in the New Zealand economy. The report will better consider the contribution to export earnings and to local economic activity by irrigation infrastructure development and management.

Stats NZ presents a regional breakdown of the irrigated activity in their 2017 survey data, and this is updated to correlate to MPI's 2020 data on the total irrigated area. Stats NZ presents that in 2017, irrigated agricultural land covered 3 percent (747,000 ha) of New Zealand's total land area of 28 million hectares (ha), however, the MPI 2020 irrigated area (930,000 ha) is 6.64 percent of New Zealand's productive land of 14 million ha. By applying a very broad rule of thumb, this would suggest the value of on-farm irrigation systems is $5,000–$25,000k/hectare, depending on the system type. Using an average of $10,000, that would suggest the current value of 900,000 ha at $9 billion. There is an ongoing conversion of old on-farm irrigation systems such as border dykes to higher precision spray and drip/micro systems. The modelled future expansion of the on-farm system value of 400,000 ha multiplied by a higher new build average of $15,000/ha would be an additional $6 billion. Irrigation scheme distribution infrastructure establishment capital "without storage" typically is modelled at about $5,000/ha of area supplied. With a water storage component added which improves supply reliability and operational flexibility, infrastructure establishment capital estimates would be closer to $15,000-$25,000/ha including both the water storage and distribution components.

IrrigationNZ Submission for the Climate Change Commission Report

See: www.irrigationnz.co.nz

We are concerned that a pathway to achieve land use change and the increased production of renewable energy has not been specified. Our view is that zero carbon targets won't be met without investment in water storage, capture, and precision use. IrrigationNZ is also keen to see an increase in hydro generation in small localised units which would reduce transmission wastage and provide a multi-use option for stored water when solar and wind energy are not as readily available. The price of electricity will make consumers keen to use power sources which decarbonise the country. Support for farmers to reduce emissions on their farms, including the precision use of water, is needed through a coordinated approach with other policy settings and farm environment planning – which should also include any water supply requirements. Water use at the right time and of the right amount can have a significant impact on production and improve farm system outcomes. Instead of irrigation being seen as an intensification approach, irrigation can be seen as a mitigator and an improver of productivity, which in turn can support the reduction in stock numbers and improve marginal land, thereby increasing the ability for mixed-use systems and the reduction of wastage. Water is a key enabler in the systems change recommendations in this report. It reduces the need for imported feed, increases the production of the land, and supports healthy herds while also enabling land use change to horticulture in marginal places. IrrigationNZ believes that lack of clarity around a policy is a significant destabiliser for the irrigation sector because of the level of cost and long-term nature of the investment in water and irrigation infrastructure.

Excerpt from IrrigationNZ submission on the NBEB

Full document available on www.irrigationnz.co.nz

- The NBEB will have a significant impact on water users, particularly farmers and growers. For example, 90 percent of all fruit and vegetables grown in New Zealand are under irrigation.
- The NBEB unfairly targets farming by labelling it as only having an adverse environmental effect, while other human activities and industries with high pollution rates are not targeted to the same degree in the NBEB.
- The NBEB places significant limitations on farmers' ability to access and use water for food production, at a time when global food scarcity is on the rise.
- The NBEB discourages investment in water capture and storage which is crucial for ensuring New Zealand's resilience in the face of climate change, including the extremes of floods and droughts.
- Water storage has numerous benefits for the natural environment and human wellbeing, and the RMA reform provides an opportunity to prioritise regional water infrastructure in a way that reflects its national significance for the wellbeing of communities, the environment, and the economy. As it stands, the NBEB does not do this. We have addressed the areas of concern in the Bill which are of particular significance to the irrigation industry and where possible have suggested solutions or alternative options in the list below.

The primary areas are:

- Lack of certainty in high-level statutory direction
- Recognition of irrigation infrastructure
- Allocation framework
- Consent duration, reviews, and cancellation of consents
- Provisions relating to farming.

Excerpt from IrrigationNZ submission on the National Planning Framework

Full document available on www.irrigationnz.co.nz

IrrigationNZ understands the focus of National Objectives Framework (NOF) guidance is to assist regional councils to implement and support the intent of the National Policy Statement for Freshwater Management 2020 (NPS-FM).

A sound NPS-FM and NOF are undoubtedly necessary to combat the current and future impacts of climate change for environmental, economic, and community wellbeing, including managing water availability across New Zealand's food and fibre-producing sector.

The large-scale implementation of freshwater planning instruments has shown an indifference to the water needs of primary industries, such as horticultural and agricultural production. These instruments largely focus on water quantity/quality as it relates to climate change, indigenous biodiversity, and areas of high natural character. While these considerations are undoubtedly important, there are ambiguous or at worst disparaging mentions of primary industries within freshwater planning instruments. There are conflicting and confusing government communications, such as through the National Climate Risk Analysis of 2020 and the National Adaptation Plan, that refer to the need for considering issues beyond biodiversity in planning for resilient communities and productive infrastructure.

- The Ministry for the Environment (MfE) National Policy Statement on Highly Productive Land 2022 (NPS-HPL) comes into tension with the purpose of the NPS-FM and NOF. The conflicting objectives will undoubtedly have a serious impact on water quantity and quality available for agricultural and horticultural activities needed to fulfil the potential of our highly productive land.
- The importance of water storage and attenuation is far too understated and there is a lack of coordination across the many government department initiatives related to freshwater management. It is important that the national water availability and security strategy that is underway within MPI is given consideration when determining environmental policies, to ensure that primary producers get sufficient access to water to achieve the objectives of our land use policies such as the NPS-HL and government-supported trade initiatives such as the 2023 Horticultural Action Plan.

Therefore, the guidance needs to be consistent with the Acts and Regulations and to not introduce bias or new aspects that have not had the benefit of prior community input. In our opinion, unfortunately there is an unhelpful negative undertone to the NOF guidance and other environmental policies and regulations, in reference to agricultural use of water resources. There is virtually no reference to any form of land use impact from human activity other than farming. Urban sprawl and municipal sewage discharges, for example, are basically untouched. There is a single use of the word wastewater in relation to the urban environment on page 76. The missing balance is that the "community view" on water availability and security for producing food with water is not mentioned as an objective of managing our natural resources. Irrigation is glossed over or outright disapproved of. Taking this negatively weighted view of water for food production, the requirements of the NOF will see constraining limits set for at least ten years with an encouragement in the guide for regional councils to take an even longer view on locking things down. That approach will place communities, social fabric, and the economy at risk.

About IrrigationNZ

IrrigationNZ represents approximately 4,500 members nationally, including irrigation water storage and distribution schemes, individual irrigators producing food, fibre and beverages, and the irrigation service sector across all regions of New Zealand. Our irrigator members include a wide range of farmers and growers – meat, dairy, and cropping farmers, horticulturalists, and winegrowers, as well as sports and recreational facilities and councils. We also represent over 120 irrigation service industry members – manufacturers, distributors, irrigation design and install companies, and irrigation decision support services for both freshwater and effluent irrigation. Many of these organisations also offer rural drinking water treatment, storage, and distribution solutions as well as stock drinking water infrastructure. We are a voluntary-membership, not-for-profit organisation whose mission is to create an environment for the responsible use of freshwater primarily as irrigation for food and fibre production for local and international consumers, but also to sustain the wellbeing and resilience of communities through responsible use of the freshwater resource and well designed and operated infrastructure. As an organisation, we actively take a technical leadership role in promoting best practice irrigation and carry out a range of training and education activities associated with general freshwater management. Over the last five years, we have provided informal training and formal qualifications to hundreds of people on various aspects of irrigation best practices to improve water use efficiency (lowering consumption) and better manage environmental effects (improved soil moisture management and surface water outcomes). We deliver qualification courses on irrigation infrastructure design, performance assessment, and operational management.

IrrigationNZ members share the same goals as many other New Zealanders:

- Reduce their environmental footprints and see improvements in the health of the natural environment,
- Contribute to the wellbeing of their communities, and
- Provide for a resilient future for New Zealand in the face of climate change.

IRRIGATION
NEW ZEALAND
WATER | FOOD | FIBRE | LIFE

#WaterForFood #WaterForFuture #WaterForAll #WaterForRivers
#WaterForFun #WaterForFarms #WaterForDrinking #WaterforLife