

SUBMISSION - DAM SAFETY SCHEME: Specification of dams to be classified

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Overview

INZ (Irrigation New Zealand) is a national body that promotes excellence in irrigation development and efficient water management throughout New Zealand, based on the principles of responsible and sustainable management of water resources.

INZ represents the interests of 3,600 members totaling 350,000ha of irrigation (approximately 50% of NZ's irrigated area). All the key irrigation service providers (trade and consultants) are also members.

Recommendation 3 – Large Dams Under the Scheme

1. Use of 'AND' versus 'OR' in the Classification

INZ does not support the need to change the July 2010 discussion document, 8m high and 50,000m³ volume, definition of a classifiable dam. This simple benchmark combined with the ability for regional authorities to capture smaller dams that pose a medium or high risk is the logical way forward.

The revised October 2010 proposal, 8m and 20,000m³ volume or 3m and 50,000m³ volume, is clumsy as it poses numerous applicability questions with regard to combinations of dam type, size and location. It also poses unnecessary compliance costs upon small rural irrigation dam owners.

The 'compromise' October 2010 proposal will capture a number of small irrigation dams located in remote rural areas which pose negligible risk. If they were to fail they would only impact upon the dam owner's property. The need to capture these dams within the dam safety scheme is nonsensical.

Regional authorities have the discretion to re-classify (referable dam) medium or high potential impact dams not captured by an 8m and 50,000m³ threshold. This negates the argument that medium or high potential impact dams would 'slip through the net'.

Some regional authorities argue they do not know where dams are located, therefore a 'capture all and then release' approach is required. This demonstrates poor thought process and a lack of understanding of internal and external information sources. For example:

- Dams used for irrigation require resource consent (dam fill / water take and storage) and so are recorded (location and usually volume).
- Detention dams and other soil conservation structures were predominantly built by catchment board grant schemes. They therefore, have had their locations recorded.
- Significant wetlands (artificial and natural) have now been, or are in the process of being, inventoried by regional authorities.
- Readily available aerial photography can be used to locate medium or high risk dams near areas of population. Both dams and more importantly areas of population are easily identifiable.

Poor public authority record keeping should not be used as an excuse for placing unnecessary cost burdens upon landowners.

2. Treatment of Location in the Definition of Large Dam

INZ supports the introduction of a locational factor (designated area) in the definition of a classifiable dam. Comments were made in support of such an approach during the initial consultation phase.

The proposed designated area definition is logical. However, INZ questions how this will be determined in practice with regard to the 50 residential dwellings or the potential impacts of an uncontrolled 20,000m³ release? Would a simplified definition such as the suggested 1km distance by Greater Wellington and Riley Consultants be a better approach? INZ considers the definition needs to be further explored and requests to be involved in the process.

Recommendation 6 – Regional Authority Discretion

INZ supports the definition of a referable dam. Providing the definition of a classifiable dam is changed in line with the submission above, i.e. returned to 8m high and 50,000m³ in combination with the 'designated area' amendment.

With regard to (1):

- (i) INZ does not support the introduction of 'a complaint has been made by a member of the public' amendment as it is an absurd approach to dam safety. Dam safety requires specialist training and expertise. Introducing a complaint procedure for the unskilled and unqualified will cause unnecessary cost to both dam owners and regional authorities.
- (ii) INZ supports the regional authority 'reasonable grounds' amendment providing strong and consistent national direction is established as to what constitutes 'reasonable grounds'. This direction should include factors such as physical position, downstream topography and dam type. INZ requests to be engaged in this process as the majority of dams to which the 'referable dam' amendment applies will be 'small irrigation storage dams'.

With regard to (2) INZ supports this approach providing direction is established as per (1) (ii).

INZ Submission Ends