

Central Plains Water Hearing

**Evidence of
Edwin Jansen
on behalf of
Ngāi Tahu Property Limited**

Central Plains Water seeks a quantity and class of water in excess of reasonable need.

If consents are granted in the form requested, it will deny the achievement of sustainable management in the Selwyn District and the wider Canterbury community.

If the CPW scheme is efficient in itself, but there are other efficient uses that in combination (with CPW or otherwise) can achieve a greater distribution and quantum of net benefits across the wider community, then these are valid uses that must be taken into account in decisions to allocate public resources.

- Enabling communities to provide for their wellbeing takes precedence over pure economic efficiency;
- Efficiency in relation to public resources should mean:
 - Productive efficiency: maximising marginal output in excess of costs across a broad community base;
 - Allocative efficiency: allocating resources equitably across society to achieve overall wellbeing;
 - Dynamic or innovative efficiency: the promotion and early adoption of new technology to get more out of less resource.

Adequacy of Regional Plans

- Canterbury does not have a comprehensive plan that addresses all interests in water;
- Consents (if granted) should survive plan changes;
- Allocative efficiency is a critical issue this hearing must address;

Regional Plans and reasonable need

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The reasonable need of the applicant has not been proven:

- No concrete evidence has been provided that there is 60,000 ha of unmet demand;
- No evidence (at all) has been provided that 98% reliability is efficient and justifiable;
- No evidence has been provided that it is both efficient and environmentally sound to replace consented (ie efficient) groundwater takes with surface water takes;

The granting of consents in excess of reasonable need of irrigators (as set out in Regional Plans) will not give effect to the purpose of the Act.

Water Reliability and Efficiency

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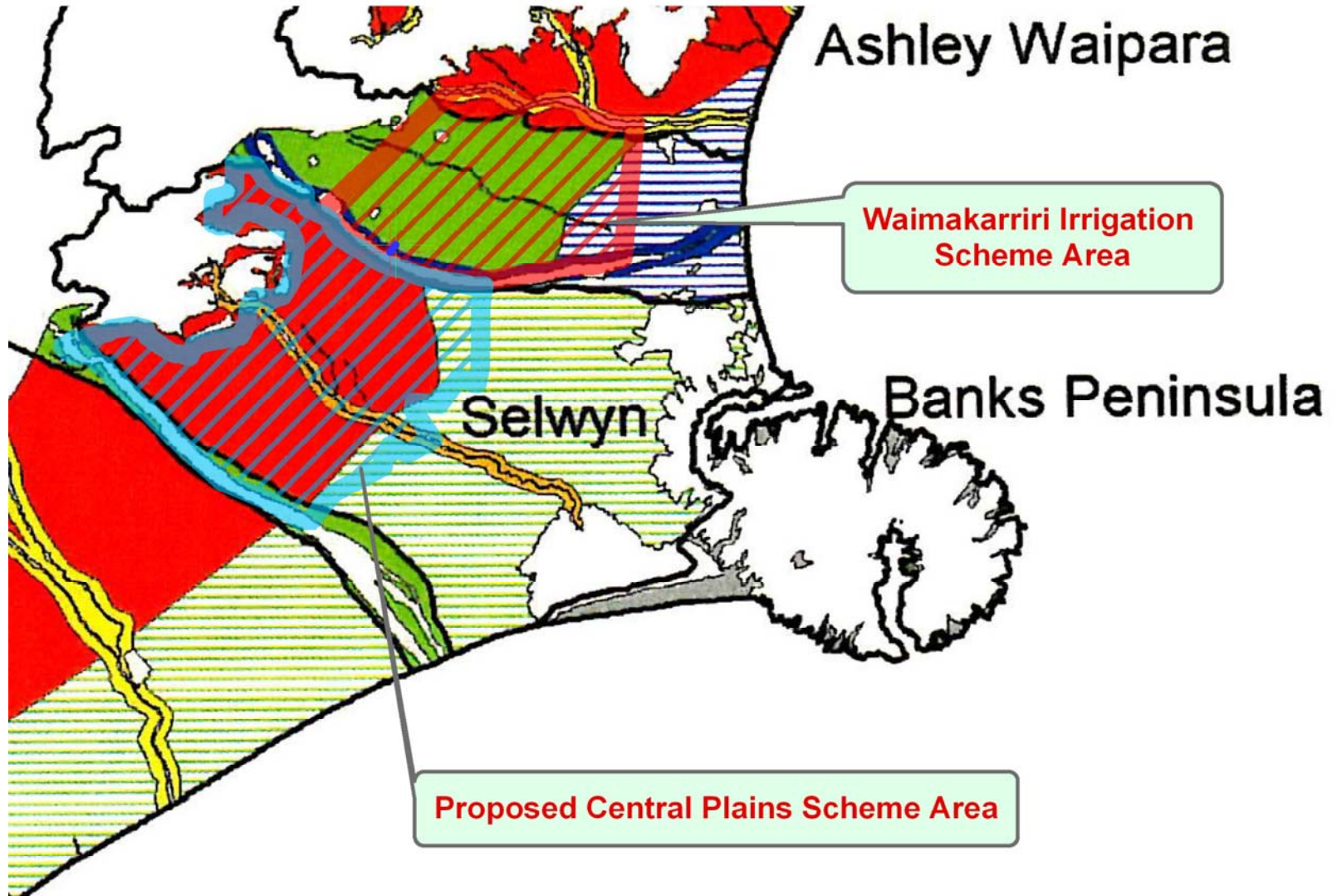
- I have provided evidence to illustrate that 98.7% reliability is inefficient and not justifiable;
- The purpose of an “A” Permit allocation block does not include the achievement of 98% reliability 10 years out of 10;
- CPW is also under estimating the reliability of the scheme (at 98.7%) because they fail to take into account the strategic usage of groundwater consents during times of restrictions;
- There is unlikely to be any measurable impact on dry matter production or economic viability from reducing reliability from 98% to 96% or 95%;
- The purpose of an “A” Permit allocation block is to provide reliability sufficient to maintain the long-term economic viability of users.

That is: Full allocation 95% of the time, 6 years out of 10 and 75% of the time, 9 years out of 10; (low-med reliability)

Allocative Efficiency

Canterbury Strategic Water Study - Blueprint for sources of water

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Sources of Water (residual)

(A plan to address all interests in water

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Potential water supply and storage options	Upper Selwyn Catchment	Lower Selwyn Catchment	Upper Waimak Catchment	Lower Waimak Catchment
Waimakariri: (run-of-river)	low reliability	low reliability	low reliability	low reliability
Rakaia: (run-of-river)	low reliability	low reliability	No	No
Combined Waimakariri and Rakaia takes	med reliability	med reliability	No	No
Groundwater (existing consents)	med to high reliability	high reliability	No	high reliability
Large-scale storage (3,000 to 4,000m³/ha)	Yes	Yes	No	No
On-farm storage (500m³ to 850m³/ha)	Yes	Yes	Yes	Yes

Ngāi Tahu Property: Consent CRC052033

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Impact of Kyoto Protocol obligations (ROI)

Pre 2008: 18.8% / 2008-2012: 17.6% / Post 2013 16.4%

Water Rights and the WRRP

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- I believe the Regional Plans grant “A” Permit holders an implied right to take “A” Permit water to achieve a reliability of supply sufficient to maintain long-term economic viability;
- This may require an “A” permit holder to augment surface water takes with on-farm storage. This should be encouraged;
- In my view, the rights do not prevent a consent authority from granting subordinate rights to allow water users that are not “A” permit holders to take allocated “A” permit water (on any day) that is not being used by “A” permit holders;
- Regional Councils are mandated to manage the allocation and use of water;
- While the “A” Permit water is fully allocated, I see nothing wrong in granting CPW a “B” permit water right inclusive of the right to take any unused “A” permit water in common with other “B” permit holders; (subject to consideration of adverse effects)
- CPW should not be required to operate in a water users group to achieve this end. That is not the function of a water users group;

Waimakariri Water Take - Consent Conditions

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- The evidence suggests that the CPW Scheme should be scaled back in irrigation area, design reliability and surface takes.
- The case for converting groundwater to surface takes is not justified.
- There is a valid case for providing a gap between existing uses and any CPW take;
 - To achieve allocative efficiency and provide for future needs; or
 - To provide a gap for environmental flows; or
 - To allow a buffer for flow measurement errors; or
 - To avoid actual adverse effects on existing consent holders; or
 - To achieve all of the above.
- Additional iterative water flow modelling with primary stakeholders is necessary before granting consents.
- The instantaneous flow measurement issue must be resolved.