



12 February 2010

Ref :

MEMORANDUM

FROM : JOHANNA ABBOTT

TO : ANGELA DEAN
CC

SUBJECT : CENTRAL PLAINS WATER – RECOMMENDED WATER METERING CONDITIONS

Central Plains Water have applied for resource consents to take water from the Waimakariri and Rakaia Rivers. Central Plains Water has applied to abstract unused water that is allocated to other water consent holders on the Rakaia River, and “unallocated” Band 2 and 3 water. Under the wording of the draft conditions as at 12 February 2010, there is no minimum time period specified, i.e., should another user not be abstracting their entitlement for an hour, Central Plains Water could abstract the entitlement instead. As such, and given that the onus is on the consent holder to demonstrate compliance, careful thought needs to be made of how this could be monitored. This is further compounded by the requirements of the Rakaia River Conservation Order and the fact that, over the lifetime of the consent, water abstraction monitoring technology is likely to change.

The most obvious solution to this given the current state of technology is for all the consents that CPW are able to abstract water under to be fitted with water meters and data loggers and for the water abstraction data to be telemetered and held by an accredited third party provider. This third party provider would then host a website which would show on a real time basis the abstraction occurring under each consent. This should be set up so that the Regional Council had full access to the website and was automatically alerted to any breach of water abstraction limits under any of the consents and of the combined abstraction limit, and also of any gaps in the data. This data would need to be stored for at least one year and made available to the Regional Council. This would enable the Regional Council to monitor compliance on a real time basis through a tamperproof remote system. This could be extended such that the other consent holders could release their allocations to CPW through a secure access on the website in lieu of providing written approvals in advance to the Regional Council. A record would also need to be maintained of these approvals. Any other system that delivered the same outcomes could be considered.

In addition, there should be a requirement for an annual compliance report to be submitted by CPW each year. This should outline their compliance with the water abstraction conditions, state what consents they were taking water under and list any breaches of consent conditions. The review clause for this consent should be worded to allow for upgrading of the technology of abstraction measurement and of maintenance of compliance records when appropriate.

Signed:

Dr Johanna Abbott