

22 May 2020

Steve Pickles
Regulatory Compliance Specialist
Bay of Plenty Regional Council Toi Moana
PO Box 364
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Dear Steve

Re: Water Consent Changes

Over a number of years, the horticulture industries in the Bay of Plenty have worked together in collaboration with the Regional Council to understand grower requirements, consult widely on new policy and advocate for sustainable and compliant water use. More recently, the kiwifruit and avocado industries have worked hard to promote efficient water use and provide resources on sustainable and compliant approaches to water management. An acknowledgment that much of this work has been supported by the Regional Council.

The water consents many Bay of Plenty growers hold have seasonal conditions where water use is time bound to assumed peak irrigation and frost periods. However new consents that are being issued have seasonal volume limits, but these are not linked to use i.e. you can use some of your summer irrigation allocation to do frost protection if needed. This change was brought in last year to help address the concerns raised by the industry and seems to have satisfied the concerns of new consent holders.

The Regional Council has communicated that for the large majority of our growers who already have a consent, requesting changes from the older style seasonal conditions to the newer style consent can be quite straight forward if it doesn't increase the rate or overall volume abstracted and have reaffirmed that minimal info would be required if the volume is not increasing and growers can show they are in line with SPASMO and frost water demands.

However, we are learning that as growers approach the council for these sensible changes to their consent, to bring them in line with the current approach, an upfront 'deposit' of \$1770 is required. This hurdle is contrary to all messaging from both industry and Regional Council on being proactive and transparent in their approach to water management and remains a significant deterrent to remaining compliant.

As rate and volume of abstraction would remain unchanged, minimal to no investigation would be required to ensure these older consents are simply re-formatted to be consistent with current consent wording.

The kiwifruit and avocado industries request that the deposit is reduced and a more reasonable fee applied. Both industries welcome the opportunity to discuss this further.

We look forward to hearing from you.

Kind Regards



Jen Scouler
CHIEF EXECUTIVE OFFICER
New Zealand Avocado



Nikki Johnson
CHIEF EXECUTIVE OFFICER
NZ Kiwifruit Growers Incorporated