

Title: Water allocation issues

Purpose: To reflect and summarise comments by the Ruamāhanga Whaitua Committee on water allocation (quantity) issues in the Ruamāhanga catchment

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Date: 1 March 2016

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Water allocation issues

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1. Background

At a workshop on 7 December 2015 the Ruamāhanga Whaitua Committee (the Committee) considered water quantity allocation issues for the Ruamāhanga whaitua. The workshop followed a report and presentation on what is in the Proposed Natural Resources Plan for the Wellington Region (the proposed Plan) in regards to water allocation.

Identified water quantity allocation issues will help with refining existing water allocation limits and programmes or activities that will support or contribute to the achievement of the freshwater objectives identified by the Committee. In particular, the issues will assist looking at the pros and cons of policy options as the Committee develops these.

2. The issues

The Committee discussed matters relating to water allocation under the four topic areas of limits, reliability of supply, efficient use of water, and efficient allocation of water. The starting point for issues in each of these topic areas is:

- **Limits** – the proposed Plan provides a region-wide allocation framework and it is appropriate for the Committee to refine the framework by developing catchment specific limits
- **Reliability of Supply** – it is appropriate that when setting limits the Committee establish catchment (and sub-catchment)-wide approaches to reliability of supply
- **Efficient Use of Water** – the proposed Plan does include use efficiency measures on a region-wide scale that can be added to at a catchment level
- **Efficient Allocation of Water** – the proposed Plan relies on the first-in-first-serve principle of allocating water that the whaitua committee is able to build on where it decides to do so.

The Committee comments for each topic are shown in the first column of Table 1. Some of the comments made at the workshop have been moved from one topic to another. The reason for this is issues for the topics limits, reliability of supply and efficient allocation of water all relate to the whole catchment. For example, an allocation limit is the numeric allocation amount for an entire catchment, and efficient allocation of water is the system of allocation applying across the entire catchment. In contrast the topic efficient use of water relates to the use of water by individuals or communities at locations where they take water in a catchment. Comments were moved so they fit under topics according to whether whole of catchment matters are being addressed or whether they are addressed through individual water takes.

Some of the comments made at the workshop are in the form of questions. These questions have been added to other questions from the workshop and are answered in a separate document ('Answers to water allocation questions') that will be provided to the Committee before the workshop on 9 February.

One new comment in regards to the efficient allocation of water has been suggested as a gap for the Committee to consider. The comment added is 'there is a general perception of permit renewal on expiry, with very little movement of allocations'. It is particularly relevant to water transfers of which there are very few in the region at

present, but they would lead to efficiency gains. The committee may or may not wish to consider this comment alongside the others.

The second column in Table 1 attempts to summarise the comments in column one.

Table 1: Issues for allocating water in the Ruamāhanga catchment

Topic: Limits	
Comments made at 7 December 2015 workshop	Summary
Is the current method for setting minimum flows, lake levels and allocation limits fair?	<p>Current limits (minimum flows, lake levels and allocation limits) are region-wide and do not necessarily reflect catchment (and sub-catchment) specific freshwater objectives and values. In order to meet catchment (and sub-catchment) wide freshwater objectives, values and limits, approaches are needed that:</p> <ul style="list-style-type: none"> • are fair, equitable and realistic • include the use of historic flows • include consideration of climate change • provide for a range of uses by applying multiple allocation bands/blocks and flexible time frames e.g. seasonal (only a single band/block applies at the present time over the whole year) • Include consideration of methods other than what is used in the proposed Plan.
All areas need to be treated equally	
Realistic limits are in place to ensure life supporting capacity, sustainable management, future generations	
Review and audit	
Minimum flows are important and need to be set on flow trends over time	
What is 'full allocation'? When we reach it	
How are catchment specific limits set?	
How are triggers set?	
Is MALF the right method?	
The impact of climate change	
Need multiple allocation bands/blocks to provide for a range of uses	
Limits and targets should provide for appropriate transition periods	
Systems other than MALF for setting minimum flows need to be considered	

Topic: Reliability of Supply	
Comments made at 7 December 2015 workshop	Summary
How are triggers set?	<p>Reliability of supply is critical for water users and can be addressed in the system for taking and using water on a catchment and sub-catchment basis.</p> <p>When addressing appropriate degrees of reliability, opportunities are available to improve reliability by such proactive methods as storage and capital investment but will involve costs that can be high. Reliability of supply also needs to be balanced with other criteria and values.</p>
What is (are) the appropriate numerical measure(s) for reliability of supply	
Prioritisation – winners and losers?	
Ground and surface water interaction – equity? Only between GW-A & GW-B	
Needs strong science and goodwill	
What about the environment?	
Minimum flow and allocation limit (to protect the supply reliability of users)	
How do you balance allocation amounts with vs reliability?	
If usage increases – reliability drops (only if there is no allocation limit)	
Cost of reliability – loss of income - capital investment to increase reliability	
Storage (Is this more important to consider than minimum flows?) – mini but \$'s make easier/macro – with care	
Proactive approach is preferable	
Critical – more input than amount	
Storage (Is this more important to consider than minimum flows?) – mini but \$'s make easier/macro – with care	
Unnecessary over-application (inefficient irrigation)	
Reliable water may be over-used and not used efficiently	
Artificial groundwater recharge	

Topic: Efficient Use of Water	
Comments made at 7 December 2015 workshop	Summary
Technology will increase efficiency	<p>Water taken by individuals and communities for their use is currently not always being used efficiently and opportunities can be taken to increase efficiency through such approaches such as technology, catchment modelling, storage, consent conditions, incentives, establishing limits, good will, and better data (monitoring and measuring).</p> <p>Some water current uses are efficient or perceived as being efficient including water not used, water that recharges groundwater, metering in towns, and storage.</p> <p>Other uses considered inefficient or perceived as being inefficient include examples such as water races and situations when there is no pressure on water use.</p> <p>Water that is currently being used inefficiently means it isn't available to other users.</p> <p>Transition periods are needed.</p>
Storage will increase efficiency	
Consent conditions and terms can incentivise efficiency	
Incentives will increase efficiency in all sectors	
Limits should incentivise beneficial change and innovative practice	
Limits should encourage efficient use	
Good will is needed to move to more efficient use	
Urban water use efficiency is important	
Allocation should be tailored to land use	
Need more and better data to enable this type of solution	
Need to know how much is used - meter and monitor	
Water not lost to use is perceived as not being inefficient	
Water not lost to groundwater is perceived as not being inefficient	
Recharging groundwater is perceived as efficient	
Use of water meters in towns is efficient	
Water harvested for storage at the farm scale is efficient	
Not all of the water that is allocated is used	
Water races are perceived as inefficient and wider debate is needed around the need for them, including the range of uses	
Inefficient water use when it is not under stress is still a mind-set that needs to be changed	
Inefficient uses should be banned	
More users are included	
Everyone benefits in the future from more efficient water use	
Helps move water to highest value uses	
Transitions periods, including consideration of economic constraints, for users to move from one system or technology to another should be provided	
Changing technology may mean that systems can become less efficient over time	

Topic: Efficient Allocation of Water	
Comments made at 7 December 2015 workshop	Summary
Water use is flexible i.e. land use change	<p>The current system for allocating water does not always maximise efficient allocation in the Ruamahanga catchment. When considering efficiency of the allocation system, fairness and equity are important</p> <p>What is the appropriate balance of economic return and all other values and uses of water?</p> <p>There isn't much transfer of water between users at the current time.</p> <p>In situations where water is fully allocated in a catchment or sub-catchment, the allocation system needs to be clear about who gets 'new water' that is made available for re-allocation (e.g. when an existing user gives up water).</p>
Business models and business development need certainty	
Reserve water for high value uses	
Risks in pre-empted allocation for the environment	
Establish allocation by land use incentives efficiency and value higher	
Efficiency measured as economic return/unit water	
Allocation geared/tailored for various land users	
First in – first served not always fair/equitable	
Develop an equity index	
Need to know how much is used	
Values can change	
Water does not always going to the highest value user (example of walnut farming)	
There is a general perception of permit renewal on expiry with very little movement of allocations	
Short term/temporary transfer is a method for raising allocation efficiency – can applications for transfers be processed quickly enough?	
Should the Council be involved in temporary transfers	
How do we provide for new users /and make new uses possible	
Not all of the water that is allocated is used (there is considerable “paper” or “unused” allocation)	

Some summarising and prioritising was done at the workshop. At this stage all the comments made are included with the exception of the following that we did not think gave enough of an indication of the issue or we were unsure: clunky (Reliability of Supply topic); tweak the purpose (Efficient Use of Water topic); room for debate, not just ornamental ponds, art has value, no use how to show efficiencies (Efficient Allocation of Water topic).

The material provided in Table 1 should be treated as a working document. It will be subject to ongoing review and amendment during the process of looking at water allocation options and policy approaches.

3. What's next?

Once a working set of issues is identified, the Committee can develop and test management options against them before developing their preferred policy approach.

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Date 01.03.2016

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Date 01.03.2016