

Takaka FLAG Meeting- Onekaka Biodiversity Group Presentation:

25/06/2017

Onekaka Biodiversity Group (OBG) wish to present the Onekaka catchment as an example of the coastal western catchments and look at freshwater issues from a community group perspective. Incorporated in 2002, OBG's focus is the ecological health of the Onekaka river and environs.

We thank Takaka FLAG for their contribution to date and generally support the draft recommendations. We make the following points and hope Takaka FLAG will support our proposed changes/ additions.

BIODIVERSITY

We note that FLAG does not specifically list biodiversity as one of the values placed on freshwater. While the FLAG values include "ecosystem health" and further, that "the health of flora and fauna should be indicated by measures of macroinvertebrate species as expected for the water body type", OBG seeks specific recognition of the wider biodiversity values, in particular that of native fish. While the measure of macroinvertebrates may be a good indicator of water quality, this measure may not be a strong indicator of these wider biodiversity values which may be more directly impacted by a changed flow regime rather than changes in water quality *per se*. Macroinvertebrate indices relate to water quality rather than water quantity.

The state of the environment report, "Our Fresh Water Environment 2017" emphasises the need to value and maintain our freshwater biodiversity. Nearly $\frac{3}{4}$ of our native freshwater fish species are in decline, $\frac{1}{3}$ of our freshwater invertebrates and $\frac{1}{3}$ of our native freshwater plants.

The lower Onekaka River has the highest recorded diversity of native fish species for any site in NZ. It also has a species of freshwater mussel endemic (so far) to the catchment.

'Flow alteration' is listed as a threat to freshwater biodiversity and this can be seen in the upper Onekaka catchment where there has been a large decline in fish density following commissioning of the Onekaka hydropower scheme.

OBG seeks that biodiversity is specifically valued in its own right. Flow reduction puts biodiversity at risk, therefore it is appropriate that TDC receive a financial contribution from consented 'takes' towards monitoring of freshwater biodiversity.

EXISTING COMMUNITY TAKE

Existing take by the Onekaka community is significant during dry weather and needs to be considered before allocation to irrigation. Approximately half of the dwellings in the catchment use surface water takes for domestic purposes, plus 4 dairy farms, 2 drystock farms and several lifestyle take stock and general farm water. These takes are greatest during extended periods of dry weather (stock drink more; people water their gardens) which is when river levels are at their lowest. We ball

park this take reaching 9 l/s, which is significant given a measured MALF in the lower catchment of 116 l/s (the point of measure is downstream of these existing takes).

OBG seeks 100% measured MALF as the minimum flow, in recognition of the high biodiversity values and existing community take. However, as this figure is close to 90% of the true MALF (measured MALF + existing take), we accept Takaka FLAG's draft proposal. We seek a 'cease take' trigger for any consented takes of 90% of the true MALF+ existing takes + consented takes.

OBG supports a maximum cumulative take (existing takes plus consented takes) from the Onekaka of 10% MALF.

GRANDFATHERING OF CONSENTS

The draft FLAG recommendations include that the consented takes on the Onekaka river are grandfathered. OBG requests that these consents are not grandfathered, for the following reasons.

- The irrigation consent is over-allocated, has not yet been exercised and expires in 2019.
- The adequacy of the minimum flows for the Onekaka hydropower consent have not been reviewed as recommended by the consenting tribunal.

LESSONS LEARNT FROM DEALING WITH A MAJOR CONSENT ON THE RIVER

OBG have a 15 yr history of working with the Onekaka hydropower consents. We have learnt:

- consents grow. The original 'take' consent was for 250 l/s. It is currently 650 l/s.
- "review clauses" look good on paper but are of little value in safe-guarding instream values. Clawing back over-allocated take is expensive and painful, councils just don't want to go there.
- trigger levels built into consents are good. They should not be alterable without notification.
- transparency is desirable. Consent monitoring data should be publicly available thru the TDC website.

5/ Notification:

We ask that Takaka FLAG recommend notification of all applications for consented allocation. If the community are to buy into decisions on allocation, they must have access to the decision-making table.

6/ Need to ensure that practise equals policy. The current over-allocation on the lower Onekaka river is because this did not happen.

Hope that makes sense.

Regards, Alec Milne and Richard Stocker

Existing take based on:

40 dwellings at 5 m³/day = 200 m³/day (Tukurua scheme users daily peak average of 4m³ with restrictors in place),

1000 cows at 70 l/day = 70 m³

70 l/cow/day for shed washdown = 70 m³

1000 drystock at 45 l/day = 45 m³

total 385 m³/day taken over a 12 hour period = 9 l/second