

Your Ref:
Our Ref:



14 April 2022

Office of the Auditor General
PO Box 3928
Wellington 6140

Attn: Jacob Strang

Dear Mr Strang,

RE: FOLLOWING UP ON PERFORMANCE AUDIT OF MONITORING HOW WATER IS USED FOR IRRIGATION – REPORT PUBLISHED MAY 2018

Thank you for your letter of 11 March 2022, requesting an update on the response by the Bay of Plenty Regional Council (BOPRC) to recommendations contained within the report “Monitoring how water is used for irrigation”, issued by the Office of the Auditor General in May 2018.

BOPRC recognises the importance of collecting good quality water use data in order to ensure that freshwater resources are well managed and protected from overuse, and continues to invest heavily in improvements in this space. A specific update of actions in response to the recommendations is provided below.

Councils continue to work with people and organisations holding water permits and intermediary data service providers to improve the timeliness and completeness of water use data received;

BOPRC has a robust process in place to encourage consent holders to meet their reporting obligations

1. All water take consent holders are contacted immediately upon issue of a consent, specifically to highlight the consent’s reporting requirements. Additionally, a letter explaining how to reach and maintain compliance with the Measuring and Reporting of Water Takes Regulations (the Regulations) 2020 amendments has been sent to all those consent holders affected.
2. For each consent, third-party data service providers receive, clear, standardised and consistent instructions about the required submission process, with communication between them and BOPRC being regular, ongoing and generally without major issues. Anecdotal feedback from these data providers has been that BOPRC’s communication and submission processes are extremely easy and efficient to successfully navigate.
3. Water take consents’ data submissions are manually checked within a month of receipt to ensure compliance with the metering and reporting requirements within the consent and the Regulations. Where non-compliance is identified, both the consent holder and respective third-party data service provider (if relevant) are contacted to identify and resolve the issue. Work is currently underway to automate this process, which will provide much more efficient oversight of incoming data.

Objective ID [Objective ID]

Since 2019, all new and replacement water take consents have, regardless of rate of take, included consent conditions requiring consent holders to measure and submit data to a more stringent standard than the Regulations (i.e targeting NEMS QC 600). With the large volume of data involved, compliance with NEMS is not currently measured within the manual compliance monitoring processes; however, as noted above, BOPRC is in the process of developing a suite of automated tools that are scalable to the volume of data resulting from both the NEMS requirement and the Regulations, to provide:

- A level of exception (or out of compliance) reporting; and
- Quality assurance of data to meet NEMS where relevant.

By 2026, through the consent renewal process, it is expected that consent condition requirements will require ‘good’ quality data to be received by approximately 77% (1146/1495) of all current consented abstraction points (see Table 1). Consents issued pre-2019 that required telemetry, and consents that will be required to telemeter via the Regulations, will add a further 17% of telemetering consents (of ‘fair’ quality data) bringing the percentage of current consented abstraction points that will be telemetering in 2026 to 93% (1392/1495).

Table 1: The metering requirements of current consented abstraction points (n=1495¹) and the associated National Environmental Monitoring Standards (NEMS) quality rating.

Water Use Reporting Required		Current	2026	NEMS Quality Required	
				Code	Zone
Not required to report water use		381	21		
Required to report water use		1,114	1,474		
Reporting Method	Manually	550	82	QC 100-200	No quality
	Telemetry (issued pre-2019)	162	149	QC 500	Fair
	Telemetry via Regulations		97	QC 500	Fair
	Telemetry (issued post 2019)	402	1146	QC 600	good

Finally, to further encourage the uptake of telemetry, a number of consent holders have received, at no charge, variations to their consents to require the NEMS QC600 telemetry standard, this has been done in exchange for:

- Changing the seasonal restrictions (in groundwater consents) to increase flexibility in abstraction; and/or
- Lower annual compliance monitoring charges, in order to reflect the efficiency of monitoring high quality telemetered data compared to manual submissions.

¹ Note: n=1495 in 2026 does not factor new consents issued, or current consents surrendered or expired without replacement

The Ministry for the Environment, councils that manage freshwater resources, and other interested groups work together to use water-use data to encourage compliance with water permits and the limits they impose, to enable effective and efficient use of freshwater resources.

BOPRC actively participates in forums relating to this; in particular, an Irrigation NZ led discussion on reviewing and updating of the 'NZ Water Measurement Code of Practice' document, which is being progressed alongside fourteen other regional councils and the Ministry for the Environment.

In regards to the additional opportunities for improvement which were highlighted in the Report, I note the following:

- **As the quality of data from water meters improves, all councils have a role in ensuring they set realistic and needs-based water allocations using all relevant and current information.**

For all new water take consents issued, an efficiency report is required five yearly from the consent holder. The report covers analysis of the water use records with parameters such as soil moisture records, and a description of efficiency measures undertaken or identified as potential improvements.

Any applications for replacement water take consents include application of current efficiency modelling, and analysis of historical water-use data to determine the future allocation volumes, rates and seasonal restrictions; telemetered data is able to be given a higher confidence rating by the processing Consent Officer.

Water use data is also analysed for nil takes to inform decisions to lapse water take consents under s125 of the RMA or cancel them under s126 of the RMA.

- **Councils need to share and promote more information with the public about how much freshwater is used.**

Data is available to members of the public upon request, and is being regularly accessed by consent applicants to build their case for allocation in the renewal process. In the previous 2 years, Council has responded to 274 requests for water-use data.

Council is working to develop enhanced ingestion, storage and reporting methods for telemetered water meter data, with an accessible and public facing view of water use data as an ultimate goal.

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I trust that this response will help to provide some understanding of the efforts underway by BOPRC in this space.

Should you require any further information in response to this information, please do not hesitate to contact Adell Gilchrist, Senior Regulatory Project Officer.

Yours sincerely,

A handwritten signature in black ink, appearing to be 'AM' with a stylized flourish.

Alex Miller

Compliance Manager – Land & Water