

Tēnā koutou katoa

Two weeks ago conditions were so wet everywhere I would have said “nobody’s even thinking about irrigation” but then we had a few days of nor’ west conditions that had us rethinking. Now, with the very wet conditions we’ve experienced over the week we’re not really expecting any water orders any time soon.

We’ve had quite an eventful period since June’s newsletter – both in the catchment, ‘behind the scenes’ (aka the OTOH Healthy Catchments Programme) and also organisationally.

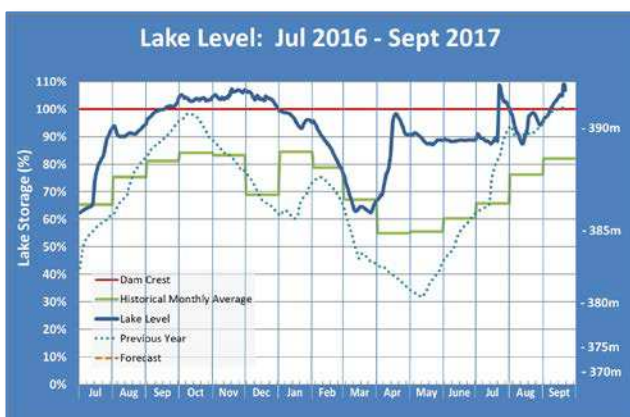
In this newsletter we update on the hydrology and storage situation and what’s been happening around the catchment and the scheme; we’ve some changes at the Board table to advise you of as well as pending changes as I am departing our great little organisation; I’ll update on how we’re tracking commercially; there’s an AGM coming up with a few things associated with that and there is A LOT going on in the Healthy Catchments Programme (HCP) space. I cover off the key points of the HCP and Julia has prepared a separate comprehensive update for you which accompanies this newsletter.

## WATER STORAGE SITUATION

The graph below shows some of the drama we’ve had over the last few months. The catchment wide drenching we all got on July 21<sup>st</sup> is very evident on the graph as it pushed the lake level nearly a metre above the spillway crest. If it was November, we would have kept the gates up and tried to generate with the excess water but, given the time of the year and the healthy snowpack we had sitting up there, we felt it prudent to spill as well as generate until the lake level returned back to 100%.

We were running the power station nearly full time through August to recover a bit of space in the lake. A bonus of all this water has been that we have had exceptionally good generation revenue and August was in fact the highest grossing month I can find on record (\$399k).

Through early September we backed off to let the lake level increase again so that we could carry out some testing of the spillway – this is a result of some new monitoring data we collected during the big spill in July. We’ve now copped the wet Monday that I’m sure had a few of us surprised and another 50mm of rainfall has us back at maximum lake level and spilling as well as 100% generation. I expect that the somewhat unwelcome rain has set everyone back a bit with their Spring activities and has pushed any irrigation demand out a couple more weeks. There is no doubt though that we are in a great position to be in heading into the Spring period where we need to provide higher river flows and manage the ramp up of the irrigation season.

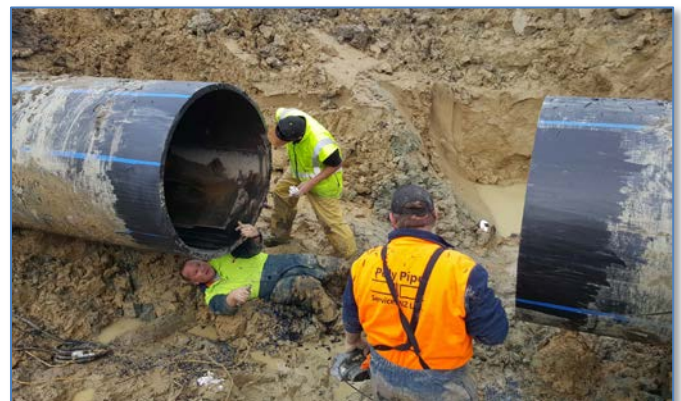


## OPERATIONS UPDATE

Craig, Chris and Sam have been busy preparing the schemes for the start of irrigation. A lot of the work has involved remedial work after the floods in July around the scheme and up at the dam site. All the scheme intakes have required major work as the river has significantly changed at each location with the amount of gravel movement that occurred.

While it was very evident it was a very big flood event across the region in July, what is not so apparent to many was the very high flow peak in the Opuha River - and this has caused us the most grief as far as gravel movement and river re-alignment. There was over 300 cumecs recorded at Skipton on the Friday afternoon which would be the highest flow by far in my own experience. What was surprising was that only 15 cumecs of this was actually coming from the dam – the other 285 cumecs was actually run-off into the river between the dam and Skiptons. At this same time, we were getting inflows into the dam of close to 300 cumecs which, if they weren’t being captured by the dam and lake, would have made for quite an interesting scenario downstream.

We have been following up with the ECan Flood Controllers and Timaru Civil Defence on communications through this event as we feel there are some learnings and room for improvement regarding the role and function of the dam in such an extreme event.



As well as the scheme intakes, there has been some substantial work done on the Kakahu MRI pipeline to repair some leaking sections. Very challenging work in the wet



conditions but both repairs will hopefully deal with longstanding problem areas.

In preparation for the upcoming season, Craig has set up a group texting service so that he will be able to issue updates to all the irrigators on each scheme to advise of any issues or changes to water supply. Craig will be forwarding details of this to you all shortly.

## **WATER METERING AND TELEMETRY**

We have had Innes McMillan working for us to assist those irrigators who have not yet completed installation or upgrade of their water metering facilities to meet OWL's policy requirements. There are approximately 30 who have requested to be part of the coordinated upgrade that Innes is managing with another 15 who have indicated they will manage it themselves.

We have received proposals from four equipment suppliers/service providers and expect to award this week.

## **ORGANISATIONAL UPDATE**

### **CEO Replacement**

Most of you will be aware that I signalled to the Board in July my intention to finish up at Opuha by the end of the year. Sorry to be saying goodbye to the best job I've had but I'm happy with the decision to seek something closer to home base after six and a half years.

The Board has advertised the position (16<sup>th</sup> Sept) and I've included a copy of the advertisement for your information.

The actual transition/changeover timing is going to depend mainly on when the incoming CEO is available to start.

### **New Board Member**

We have a new Independent Director to bring us back to full complement around the Board table.

Paul Burns joined the Board on 1<sup>st</sup> September after successfully navigating the Board's widespread search and recruitment process. Paul is Chief Financial Officer at Craigmores Sustainable so comes with an involvement and very keen interest in the agriculture sector and his very strong financial skills will be a welcome addition to the Opuha governance team.



## **AGM**

We have scheduled the OWL AGM for Tuesday 5<sup>th</sup> November starting at 3:30pm. A notice calling for nominations for Directors has been issued with a closing date of 29<sup>th</sup> September. Milne Horne and Dermott O'Sullivan are retiring through rotation and both standing for re-election.

### **Constitution and Water Supply Agreement Amendments**

Just as a heads up, there are a few details in our current Constitution and Terms of Supply/Water Agreements that we are looking at amending. We are working with our legal advisors on the changes required and these will be advised to our shareholders ahead of the AGM for approval at the meeting.

Insurance cover – our Water Agreements currently can require shareholders to pay water charges even when irrigation water is not available. This is generally intended to cover short term operational interruptions to supply or restrictions due to drought conditions but could also extend to the unlikely scenario of a major event at the dam that may result in a loss of storage for several years. As part of our comprehensive (and expensive!) insurance portfolio for the dam assets, we have always carried business interruption insurance for a dam failure event to cover the loss of generation revenue and also 'water revenue'. The Directors are clear that they want this risk covered by insurance and not sitting with shareholders and to avoid any ambiguity around this, we are seeking, if we can, to amend the Water Supply Agreements to relieve shareholders in the event of a dam failure event.

Directorships – there are a couple of process things in the Constitution regarding renewal of Directors that we wish to tidy up. One relates to the requirements for "one third of Directors to retire at each AGM" as well as "each Director is to retire by rotation after a three year term". If you consider that we have five farmer directors and do the maths, we end up every third year with only one Director who is up for rotation on their three year term but we are required to have two Directors (one third to the nearest whole number) retire. This has occurred this year and has required one of the Directors to retire after only two years. We will be looking to remove the "one third" requirement. The second, very minor amendment, relates to the requirement to put notices in the newspaper which we think is no longer effective or worth the expense given our ability to communicate to most of our shareholders by email and the remaining few by post.



### **Company Debt**

We've had a good start to the financial year with plenty of water enabling steady generation. Although we aren't exposed to the very high spot prices that prevailed in July,

our power purchase contract with Pulse still provides good prices for us in the winter months. This combination of good prices and high generation has provided us with good earnings and we accumulated sufficient reserves for us to retire some more debt at our next roll-over in October.

We have restructured a proportion of our debt that we assign to Kakahu to bring that 'sub-portfolio' into line with our overall Treasury Policy. The K shareholders have received a letter explaining this in detail.

## **IRRIGATION SEASON**

With the irrigation season approaching (by Xmas surely!?) I would just like to update you on our on-line water ordering system.

In June, we received some unwelcome advice that the entity that had developed and was supporting our water ordering system was not continuing in business. In response to this, we have been working with DataCol to help transition the water ordering programme into their company and to provide some support while we reassess our long term options. In light of this disruption, I'm flagging that there may be a few glitches with our system as we get underway again this year. The on-line system has proved to be extremely effective in being able to consolidate an accurate daily water demand which we then use to determine our dam releases and river flows. It is essential that everyone continues to use this system and we will be making all efforts to ensure it remains reliable for this season.

## **HEALTHY CATCHMENTS PROJECT**



Our work in the Healthy Catchments Project (HCP) continues to occupy the workloads of Julia and Tony as well as the Board of Directors, and also, more recently, the time and attention of a number of shareholders. It is a complex process with numerous workstreams OWL are involved in. This newsletter aims to provide a summary of these workstreams and alert shareholders to the opportunities they have to be involved over the next 4-6 months.

Just to recap, the HCP is the 'sharp end' for our region of the Canterbury Water Management Strategy (CWMS), which will see the Orari-Temuka-Opihi-Pareora Zone Committee (OTOP ZC) making recommendations to ECan on the content of the OTOP sub-regional plan. Significantly for OWL shareholders, this plan process will revise the Opihi River Regional Plan (ORRP) which all of the Opuha scheme and individual water consents are granted under. It will develop a new minimum flow and allocation regime which will guide the future replacement of any water consents. It will also set catchment specific nutrient limits which you will have to meet on-farm through the implementation of (as a minimum) Good Management Practice.

There will be some repetition in here from previous newsletters and correspondence, but we thought it was

valuable again to recap the whole process so you understand the background and our strategy from here.

## **Opihi River Adaptive Management Framework**

You will (hopefully) remember from previous newsletters that late last year OWL initiated the Adaptive Management Working Group (AMWG), a technical group to develop an adaptive river management regime for the Opihi River to recommend to the OTOP ZC for their consideration as part of the Healthy Catchments Project. It consists of reps from OWL, F&G, DOC, TDC, NIWA and de Joux consulting. Together they have considerable experience and understanding of the Opihi River system and most are long standing OEFRAG participants. The AMWG have discussed and developed an adaptive management regime for the Opihi River which includes a river flow regime, an irrigation and community supply restriction framework, the requirement for artificial freshes and flow variability, flood buffering, monitoring and the role of the Opuha Environmental Flow Release Advisory Group (OEFRAG).

The Adaptive Management Regime was most recently presented to the OTOP ZC on the 11 September. The Regime Framework 'report' itself is a comprehensive 38pg document but we had to boil this down into some principle based recommendations to make it 'fit' with the 'Solutions Package' document being produced by the ZC. For your info, you will find these recommendations appended to this newsletter.

We have had some reasonably comforting feedback from ZC members that as a whole there is general support for the Adaptive Management Regime. However there are likely to be some recommendations they are happier to endorse than others. We will continue to work alongside the ZC wherever we can to ensure they fully understand the background and rationale for the recommendations and provide any further information needed to give them confidence in the proposed regime.

## **Opuha Scheme related matters**

On the 11<sup>th</sup> September OWL also presented to the ZC on a number of Opuha Scheme related matters. This presentation opened with some vitally important background about the origins of the scheme and the benefits the whole community have enjoyed over the last 19 years of scheme operation. Fundamentally we wish to ensure that firstly, the OTOP sub-regional plan continues to recognise the critical role that the Opuha Dam has in maintaining flow and connectivity and providing reliable water for community supply and irrigation within the Opihi catchment, and secondly, it enables those affiliated to the Opuha Scheme to continue to benefit from their affiliation to the Scheme and augmentation by the Opuha Dam.

There were a number of 'topics' presented and discussed with the ZC. Again for your information we have appended the recommendations to at the back of this newsletter. We continue to be assisted by local experts. George Hamilton, our legal advisor from Tavendale and Partners in Timaru has proven be of particular value as we navigate our way through the process.

### Tributary minimum flow and allocation review

It has become clear that one of the more challenging and contentious aspects of the HCP is the review of the minimum flows and allocations of the tributary rivers, namely the North and South Opuha, Upper Opihi and Te Ana A Wai. This review has the potential to significantly impact the reliability of these shareholder abstractors.

We are working directly with these shareholders to ensure they have the information they need to be able to engage with ECan and the ZC in discussions regarding the implications of any changes to the minimum flows of or allocations in these rivers.

The Cascade and Morris Rd users presented some compelling arguments to the ZC last week in terms of retaining the current flow and allocation regime. This was backed up by a reliability analysis undertaken by Dick de Joux and an economic impact analysis undertaken by Justin Geary from NZ Farm Management. We are lucky to have these local experts who understand our business and the business of OWL shareholders.

We anticipate similar reliability and economic analysis now being undertaken for the remaining tributaries over the next 2-4 weeks in order to support those shareholders in their discussions.

We are also looking at forming a 'working party' of 1-2 representatives from these tributaries in order to ensure consistency across the scheme in the messages we are trying to get through to the ZC. Julia will be progressing this idea in the next week or so.

Our commitment to supporting this group of shareholders has also extended to engaging Greg Ryder, freshwater ecologist from Ryder Consulting in Dunedin, to assist and provide advice on ecological matters relating to both the flow and allocation review as well as matters relating to the main stem.

### Catchment group involvement

Catchment Groups have all been given the opportunity to present their views to the ZC over the last couple of months. ZC reps presented their feedback back to the three Opihi catchment groups last week at a joint meeting. It was clear from the discussion that the ZC are still lacking a great deal of information they need to be able to make robust, informed decisions. If you are part of a catchment group I would encourage you to continue to be involved as they present a valuable avenue to have your say.

### Timeline from here

Our current understanding of the timeline over the upcoming months is outlined below. For those who were at the joint catchment group meeting last week, you would have heard the push back the ZC and ECan received from attendees regarding the timelines and the need to halt the process until all information needed to make decisions was available. The ZC Chairman responded that there *may* be some 'slippage' in the timeframes, however to date this has not been confirmed. We will endeavour to keep you updated on timeframes as information/updates come to hand.

2 Oct	ZC Meeting – Draft 'Solutions Package' of recommendations is approved by ZC
4 Oct	'Solutions Package' is made available to public
10 Oct – 24 Oct	<u>Community meetings / Drop in displays</u> ECan staff and ZC reps present at catchment based venues to talk about recommendations and allow the community to provide feedback in groups & as individuals at display stations  <u>Meeting Locations</u> Geraldine, Pareora, Pleasant Point, Fairlie, Timaru
Early Nov	Drop in Sessions: Timaru based – industry and NGO's book <u>slots</u> to discuss with ZC
15 Nov	ZC receive community feedback from wider engagement
20 Nov	ZC Meeting – Discuss community feedback report and make corresponding changes to the 'Solutions Package'
4 Dec	ZC Meeting – Formally accept and sign off 'Solutions Package'

Following this sign-off in December, the 'solutions Package' is then passed to ECan Planners to draft into an RMA planning framework, consistent with the Land and Water Regional Plan. The current timeframes have ECan formally notifying the plan for public submissions in June/July 2018.

We have been told there will be further opportunities for 'consultation' and 'engagement' during the first half of next year whilst this plan drafting is occurring but we do not know how or at what level this is likely to occur.

What is clear is that the more we (both OWL and shareholders) can do over the next 3 months to get our messages heard by the ZC, the better. This is the period of most influence and is likely to set the scene for how the process plays out over the next 6-12 months.

We appreciate this is hard, especially as we are working with incomplete information, but we do strongly encourage you to be involved in the process wherever you can. Julia will forward by email the details of any public forums/meetings when details come to hand.

If you have any questions about any of the aspects of the Healthy Catchments Project, please contact Julia on 021 535 174 or [julia@opuha.co.nz](mailto:julia@opuha.co.nz)

I'll be in touch again as we start to get things underway for the irrigation season.

Regards



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The following tables summarise the recommendations made to the OTOP Zone Committee by Opuha Water Ltd. The first table represents the recommendations in relation to the Adaptive Management Flow Regime and the second table relate to matters specific to the Opuha scheme.

<b>Opihi River Adaptive Management recommendations sought</b>	
Subject	Recommendation Sought
Adaptive Management Framework	<ul style="list-style-type: none"> <li>• A framework for an adaptive management flow regime for the Opihi River is built into the OTOP sub-regional plan, which makes the best use of the storage capability of Lake Opuha for the purpose of:               <ol style="list-style-type: none"> <li>1. Retaining connectivity in the Opihi River and reliability of supply for the river, affiliated community water supply and affiliated irrigators; and</li> <li>2. Improving river health in the catchment downstream of the Opuha Dam.</li> </ol> </li> <li>• The adaptive management flow regime framework balances the need for planning certainty, while being adaptive enough to respond to various climatic and river health situations.</li> <li>• The adaptive management flow regime awards priority to the environment, followed by community supplies and then irrigation, consistent with the priorities set out in the current ORRP, the Canterbury Water Management Strategy and the Canterbury Land and Water Regional Plan (LWRP).</li> </ul>
Opihi River Minimum Flow Regime	<ul style="list-style-type: none"> <li>• Saleyards Bridge (SYB) remains the main minimum flow monitoring site for the Opihi River.</li> <li>• Monthly variable minimum flows at Opihi SYB are adopted.</li> <li>• Flow variability within months is provided for through prescription of both a minimum instantaneous flow and a minimum monthly average flow.</li> <li>• The change in instantaneous minimum flow requirements between months is achieved over a transitional period of 24hrs prior to and 24hrs after the first day of the month.</li> <li>• The total annual environmental flow volume (i.e. the sum of the proposed minimum monthly average flows) is the same as that currently provided for in the ORRP (the sum of the minimum monthly instantaneous flows).</li> </ul>
Water Shortage Regime and Decision Process	<ul style="list-style-type: none"> <li>• The Opihi River minimum flow regime anticipates water shortage events, by providing two water shortage minimum flow regimes as exceptions to the default Opihi River minimum flow regime described above. The two regimes reflect the different severities of possible events as follows:               <ul style="list-style-type: none"> <li>○ Level 1 – 1:5 year (20%) probability; and</li> <li>○ Level 2 – 1:20 year to 1:30year (3-5%) probability.</li> </ul> </li> <li>• A water shortage minimum flow regime is imposed by ECan if the minimum required Potential Available Volume of lake storage (PAV) is triggered and an assessment of identified factors supports that course of action.</li> <li>• A community advisory group (with membership comprising representatives of Te Rūnanga o Arowhenua, CSIFGC, DoC, OWL (management), OWL (Board), TDC and Mackenzie District Council) will have a role in the process for determining whether a water shortage minimum flow regime is imposed by making recommendations to ECan as to the appropriate cause of action after undertaking an assessment of identified factors.</li> <li>• Prior to the notification of the LWRP/OTOP sub-regional plan change, the AMWG and OWL, in consultation with ECan, will undertake an analysis of historical stored water volumes (based on lake levels) and inflows to Lake Opuha (rainfall and snowpack) to determine minimum required monthly PAVs for Level 1 and Level 2 water shortage events.</li> <li>• If the water level in Lake Opuha falls below RL370, there is no requirement for water to be released for environmental flows or irrigation abstraction, and outflows from the Opuha Dam must equal inflows to the Dam.</li> </ul>

## Opihi River Adaptive Management recommendations sought

Subject	Recommendation Sought
Abstraction Restriction Regime for Irrigators and Community Supplies	<ul style="list-style-type: none"> <li>• Irrigation restrictions are imposed when either the Level 1 or Level 2 water shortage minimum flow regimes are imposed. The level of restriction reflects the different criticalities between irrigation and river demand for different times of the year.</li> <li>• The restriction regime is based on a fortnightly volumetric restriction rather than an instantaneous flow restriction to provide for greater flexibility on-farm.</li> <li>• Recognising that affiliated consents that authorise abstraction in the North and South Opuha, Upper Opihi and Te Ana a Wai Rivers are constrained by the minimum flows of their specific rivers, and consequently lower reliability, such consents are subject to a less restrictive restriction regime than that which applies to affiliated consents in the catchment below the Opuha Dam.</li> <li>• Affiliated water users retain a higher reliability of supply than non-affiliated water users, during both high and low flow situations.</li> <li>• The current region-wide LWRP policy (4.49) related to community supplies applies to the Opihi River catchment, however an amendment is made to LWRP Schedule 25 to ensure that the TDC water supply strategy takes into account the restriction regime for irrigators based on Level 1 and Level 2 water shortages.</li> <li>• If no water supply strategy is developed by the TDC, the community supplies restriction defaults to 50% of the irrigation restrictions, with a 'floor' of 40% restriction. =</li> </ul>
Artificial Freshes and Flow Variability	<ul style="list-style-type: none"> <li>• Artificial freshes are provided for through the 'environmental allocation' i.e. the amount of water available between the average monthly flow and the monthly minimum flow.</li> <li>• The minimum frequency and magnitude of artificial freshes is prescribed and developed in consultation with the AMWG. Beyond this minimum requirement, artificial freshes are enabled but flexibility is provided for to build knowledge and understanding around the effectiveness of artificial freshes and adaption over time.</li> <li>• The community advisory group described under "Water Shortage Regime and Decision Process" above advise OWL of the need for artificial freshes based on identified health indicators.</li> <li>• There is no expectation for freshes/variability when a Level 2 water shortage regime is imposed, in recognition of the extremity of such an event and the need to conserve water.</li> </ul>
Flood buffering	<ul style="list-style-type: none"> <li>• Flexibility is provided for adequate or responsive flood buffering (release of water from the lake in order to lower the lake and provide storage space to buffer a high inflow event) based on knowledge of the presence of significant snowpack in the upper Opihi catchment or advance warning of rainfall in the catchment.</li> </ul>
Monitoring	<ul style="list-style-type: none"> <li>• That the level of surface and ground water quantity and quality monitoring currently being undertaken continues.</li> <li>• That ECan works with both the AMWG and OWL to ensure the water quantity and quality monitoring within the Opihi catchment provides a meaningful assessment of the effectiveness of the adaptive management flow regime and provides data with which the parties may consider potential improvements to that regime.</li> </ul>

**Table 2 - Opuha Scheme related recommendations sought**

Subject	Recommendation Sought
Role of the Opuha Dam	<ul style="list-style-type: none"> <li>• That the OTOP sub-regional plan:</li> <li>• recognises the critical role that the Opuha Dam has in maintaining flow and connectivity, and providing reliable water for community supply and irrigation within the Opihi catchment; and</li> <li>• recognises the Opuha Dam's role in the generation of renewable energy; and</li> <li>• enables those parties affiliated to the Opuha Scheme to continue to benefit from their affiliation to the Scheme and augmentation by the Opuha Dam; and</li> <li>• recognises that Lake Opuha is an artificial reservoir, not a natural lake, and that while recreation is encouraged, it is an ancillary benefit, not the purpose of the Lake</li> </ul>
Tributary shareholding and offsets	<ul style="list-style-type: none"> <li>• That the OTOP sub-regional plan recognises the existing hydrological model for the Opuha Scheme; and specifically</li> <li>• That the OTOP sub-regional plan continues to recognise and provide for the offset of the takes from the 'above dam' tributaries (North Opuha, South Opuha, Upper Opihi, Te Ana a Wai) by the release of water down the main stem from the Opuha Dam; and</li> </ul>
Tributary minimum flows	<ul style="list-style-type: none"> <li>• That the review of minimum flows and allocation for the 'above dam' tributaries recognises the offset in the main stem and the benefit it provides to the upper reaches of the river as well as the lagoon/rivermouth.</li> <li>• That there be genuine consultation with potentially affected consent holders on the ZC's recommendations for tributary minimum flows, informed by robust economic and social analysis of the implications of any changes.</li> <li>• That the outcome of the tendered ecological work (including the raw data) be made available to interested parties as soon as it is completed.</li> <li>• That in the interests of collaboration and minimising costs to all parties later in the planning process, there be an opportunity for expert caucusing following the completion and analysis of the tendered ecological work by the interested parties.</li> <li>• That provision be made for the experts to report back to the ZC on the outcome of that caucusing prior to the ZC's intended consultation with affected consent holders.</li> </ul>
Main stem / scheme allocation	<p>That the OTOP sub-regional plan's water allocation framework:</p> <ul style="list-style-type: none"> <li>• provides an allocation limit for the Opuha Scheme that reflects the maximum irrigation flow rate of 7.038 cumecs; and</li> <li>• recognises that the Opuha Scheme shall retain the benefit of any in-Scheme efficiency gains; and</li> <li>• provides a consenting framework that does not foreclose opportunities to take beyond the Opuha Scheme allocation limit in appropriate circumstances; and</li> <li>• recognises that while 'on paper' the consented allocation of AA and BA consent holders may exceed 7.038 cumecs, at any given time, the maximum irrigation flow rate will be no greater than 7.038 cumecs.</li> </ul>
Tributary allocation	<p>That the OTOP sub-regional plan's water allocation framework:</p> <ul style="list-style-type: none"> <li>• views the Opihi catchment (excluding Temuka) as a whole catchment when setting the allocation limits; and</li> <li>• sets the Opihi catchment's allocation limits based on the existing total allocation from the catchment.</li> </ul>

**Table 2 - Opuha Scheme related recommendations sought**

Subject	Recommendation Sought
Future management of the scheme consented allocation	That the OTOP sub-regional plan enables: <ul style="list-style-type: none"><li>• the application of the water users group concept under region-wide CLWRP policies 4.67 and 4.72 to the Opuha Scheme; and</li><li>• the transfer of individual affiliated consents to Opuha Water Ltd (as a Principal Water Supplier), and the future operation and management of the Opuha Scheme's allocation under a global consenting framework.</li></ul>
BN Takes	<ul style="list-style-type: none"><li>• That the OTOP sub-regional plan caps the BN allocation in the North and South Opuha at existing consented allocation to prevent more 'flood harvesting' water being allocated in these catchments.</li></ul>
Reasonable use	<ul style="list-style-type: none"><li>• That the OTOP sub-regional plan provides an alternative approach to calculating annual consent volumes which reflects the OWL shareholding rather than the current Schedule 10 requirements.</li></ul>
Stream depleting takes	<ul style="list-style-type: none"><li>• That the OTOP sub-regional plan ensures that OWL affiliated water users are not adversely impacted by any recommended changes to the present ORRP stream depletion assessment methodology.</li></ul>
On-farm storage	<ul style="list-style-type: none"><li>• That the OTOP sub-regional plan recognises the efficiencies in water use and distribution that can be achieved through on-farm and in-scheme water storage, and is enabling of such storage in the Opihi catchment.</li></ul>
Changes to consented use	<ul style="list-style-type: none"><li>• That the OTOP sub-regional plan provides a consenting pathway for changes to consented 'use' of water.</li></ul>
Nutrient management	<ul style="list-style-type: none"><li>• That the OTOP sub-regional plan enables Irrigation Schemes or Principal Water Suppliers to apply for a consent that authorises the discharge of nutrients from their respective schemes</li></ul>
Freshwater quality limits	<ul style="list-style-type: none"><li>• That the freshwater outcome of TLI 4 for Lake Opuha be included in the OTOP sub-regional plan to recognise that the lake is first and foremost a storage reservoir with variable lake levels and a large operating range, and to reflect the monitoring data over the last 12 years.</li><li>• That site specific ecological health indicators be developed for Lake Opuha.</li></ul>