

Response ID ANON-URZ4-5FQG-8

Submitted to Fast-track approval applications
Submitted on 2024-05-03 15:10:12

Submitter details

Is this application for section 2a or 2b?

2A

1 Submitter name

Individual or organisation name:
Amuri Irrigation Company Limited (AIC)

2 Contact person

Contact person name:
Sara Black

3 What is your job title

Job title:
CEO

4 What is your contact email address?

Email:
sara@amuriirrigation.co.nz

5 What is your phone number?

Phone number:
021710721

6 What is your postal address?

Postal address:

P O Box 194, Culverden 7345, New Zealand

7 Is your address for service different from your postal address?

No

Organisation:

Contact person:

Phone number:

Email address:

Job title:

Please enter your service address:

Section 1: Project location

Site address or location

Add the address or describe the location:

The proposed Balmoral Water Supply Facility ('the BWSF') Site is located 20 kilometres ('km') west of Culverden township. The Site is located within the Balmoral Forest adjacent to Tekoa Road and the existing Balmoral irrigation race. The land is private forestry and farmland owned by Ngāi Tahu Farming Limited and a signed agreement is held with the landowner in relation to the construction of the BWSF. The Site is located within the Amuri Basin, a relatively flat, low-lying area of farmed land approximately 60km long and 20km wide. The basin is elongated in a north-easterly direction and is bounded by hills to the north-west and south-east. The Site is characterised by a gentle gradient, with developed rotational exotic forestry. The terrain gradually falls in a south easterly direction from

relative level ('RL') 305m to RL 297m across a 1.2km span from the northwest to the southeast of the Site.

The source of the water is from the Hurunui River mainstem. The Hurunui River is diverted by a gravel and rock bund which separates water from the mainstem of the river to direct flow into a secondary river channel. Flow is diverted into the irrigation head race via a concrete culvert from that secondary channel, the culvert is controlled by a radial gate. The head race passes over a sediment retention weir immediately upstream of the main sediment pond with the weir retaining the heavier sediment deposits. This weir is sluiced by a manually controlled sluice gate. Water passes over the sediment retention weir then discharges into the main sediment pond. The fish screen, that is proposed to be replaced, is located at the end of the sediment pond where flow is directed into the irrigation canal which includes a radial gate to control the flows.

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Map showing pond and FS.png was uploaded

Upload file here:

24_05 Map 3 HWRRP.pdf was uploaded

Do you have a current copy of the relevant Record(s) of Title?

Yes

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Who are the registered legal land owner(s)?

Please write your answer here:

Ngai Tahu Farming Limited

Detail the nature of the applicant's legal interest (if any) in the land on which the project will occur

Please write your answer here:

Amuri Irrigation Company Limited (AIC) has an easement for the intake, fish screen and canal. AIC has a signed agreement with the landowner to grant an easement in relation to the site.

AIC already holds the resource consents needed to divert, take, store, use and discharge water over an area of land on the northern side of the Hurunui River. The resource consents allow for the take and use of water from the Hurunui River and the settling pond at a rate of 5.258 m³ per second ('m³/s'). The BWSF will be filled using consented water from the Hurunui River.

Section 2: Project details

What is the project name?

Please write your answer here:

Balmoral Water Storage Facility and Fish Screen (BWSF)

What is the project summary?

Please write your answer here:

To construct a water storage facility to impound up to 10 million cubic metres ('Mm³') of water. It would consist of a ring dam, associated construction phase water takes, dewatering of ground water, and associated discharges. The installation of a fish screen structure within an artificial watercourse, and any associated discharges is included as is an additional diversion of 1.5 m³/s of water from the Hurunui River for operation of the upgraded fish screen and bypass.

What are the project details?

Please write your answer here:

AIC utilises existing resource consents for the delivery of water to its shareholders via existing regionally significant irrigation infrastructure. The Company also holds resource consents needed to take, store, use and discharge water.

AIC proposes to install the BWSF within the Balmoral Forest. The BWSF will be located adjacent the existing Balmoral irrigation race, and outside the riverbed of the Hurunui River (approx. 1.2km from the river on the North Bank). Water will be pumped into the BWSF from the Balmoral irrigation race and released via gravity back into the same race as required. Water will be taken during high flows and directed into the irrigation race. AIC is not planning to increase the flow in the Balmoral irrigation race and will operate within existing resource consent conditions for the take and use of water from the Hurunui River. While there may be a small change in the annual volume taken from the Hurunui River once the BWSF is operating, the annual volume taken will be less than what is permitted by resource consent. Put concisely, the construction and operation of the BWSF seeks to:

- Store water when otherwise not required for irrigation or hydropower generation
- Stored water will provide reliability to the Company's current shareholders via the existing Waiau and Balmoral irrigation networks,

In addition, AIC proposes to install a new fish screen to replace the existing screen at the downstream end of the Balmoral settlement pond. The proposed fish screen will replace the existing fish screen which is legally established. The new fish screen will reflect the most up-to-date guidance on fish

screening and will provide greater certainty that native freshwater fish and sport fish will be screened from the BWSF and wider Balmoral network. To operate the fish screen in accordance with the recommended design parameters, AIC seeks consent for the additional diversion of water up to 1.5m³/s from the Hurunui River. This additional diversion will also result in an increased minimum flow regime for the scheme.

Describe the staging of the project, including the nature and timing of the staging

Please write your answer here:

Construction of the BWSF will include:

- Establishment of sediment and erosion controls;
- Establishment of a temporary construction compound;
- Site clearing;
- Establishment of a disposal area;
- Access road preparation;
- Delivery of materials and equipment;
- Construction
- Demobilisation
- Site rehabilitation.

An Operations and Maintenance Plan, prepared in accordance with the New Zealand Society of Large Dams (or 'NZSOLD') Dam Safety Guidelines, will be finalised (a well-developed draft has been prepared already) prior to the BWSF being commissioned. This will comprehensively cover the dam embankments, inlet and outlet structures, spillway, and the BWSF itself.

What are the details of the regime under which approval is being sought?

Please write your answer here:

Resource consent under Resource Management Act 1991

If you seeking approval under the Resource Management Act, who are the relevant local authorities?

Please write your answer here:

Hurunui District Council ('the HDC') and the Canterbury Regional Council ('the CRC')

What applications have you already made for approvals on the same or a similar project?

Please write your answer here:

Resource Consent Applications have been lodged with CRC and the HDC for the construction and operation of the BWSF, and for the replacement and operation of the fish screen at the Balmoral intake. No decisions have been made.

Is approval required for the project by someone other than the applicant?

No

Please explain your answer here:

No, aside from the resource consents that are needed from the CRC and the HDC, and the building consents that will be needed from the CRC, who are responsible for building consents for large dams in Canterbury.

AIC already holds existing resource consents for the diversion, take, use and discharge of water. A consent is held for the existing fish screen. The building consents cannot realistically be sought until the parameters of the BWSF and the replacement fish screen are known. The parameters will be determined by the resource consents that are approved.

If the approval(s) are granted, when do you anticipate construction activities will begin, and be completed?

Please write your answer here:

Milestone Planned date

Detailed Design BWSF August to November 2024

Procurement BWSF August 2024 to April 2025

Construction BWSF August 2025 to March 2028

Detailed design – Fish screen March to May 2025

Procurement fish screen June to September 2025

Construction Fish Screen September 2025 to March 2027

Commissioning Fish Screen March 2027

Section 3: Consultation

Who are the persons affected by the project?

Please write your answer here:

- Hurunui District Council
- Canterbury Regional Council
- Te Runanga o Ngāi Tahu
- Ngāi Te Tuahuriri Rūnanga
- Te Rūnanga o Kaikoura
- Department of Conservation
- Transpower
- Fish and Game

Detail all consultation undertaken with the persons referred to above. Include a statement explaining how engagement has informed the project.

Please write your answer here:

Community and cultural consultation have been undertaken by AIC for the BWSF and the proposed replacement fish screen over a number of years.

Community Meeting

AIC held a community meeting on Tuesday the 6th of December 2022 at the St Johns Rooms, Montrose Avenue in Culverden. The meeting was open to the public and intended to address any concerns or questions members of the local community may have regarding the project.

For four weeks prior to the meeting date, the consultation session was advertised in weekly community papers including 'The Peril', which is distributed across Culverden and 'The Citizen', which services the Rotherham, Waiau, and Mt Lyford areas.

AIC advise that the meeting was attended by local farmers and the predominant consensus after the meeting was that the BWSF is a positive development for the community. We are advised that no significant concerns were conveyed by those in attendance.

Engagement with Ngāti Kuri and Ngāi Tūāhuriri Rūnanga

AIC is committed to understanding the cultural values that exist in and around the areas associated with the Proposal and is seeking to engage with and work with Tāngata Whenua to address any concerns and issues held.

AIC has engaged with both Ngāti Kuri and Ngāi Te Tūāhuriri. The following bullet points summarise the engagement that has occurred:

- A MOU was signed between Ngāi Tūāhuriri, Ngāi Tahu Farming and AIC on the 3rd of August 2021 which anticipated this proposal;
- AIC met with Ngāti Kuri on multiple occasions (virtually in March 2022, in person on the 18 January, the 3 May, 27 July and, 5 December 2023 and again in April 2024) to discuss cultural values and the proposal. While these discussions focused on broader topics, a further hui is planned in May 2024, and AIC aims to discuss both the BWSF and the proposed replacement fish screen and how AIC can resource Ngāti Kuri to work on the projects together;
- AIC met with Ngāi Tūāhuriri and Ngāi Tahu Farming in March 2023 and again on 25th March of 2024 to discuss the project; and
- On 8 May 2023, AIC met with Ngāi Tahu Farming, as landowner for the project, to discuss the opportunity the BWSF provides for their SH7 block to receive equal reliability and to discuss Ngāi Tahu Farming giving its affected party approval to the proposal.
- Representatives from Ngāti Kuri, Ngāi Tūāhuriri and Ngāi Tahu Farming have been advised of AIC's intention to apply for this project's inclusion in this process. No feedback on this decision was received at the time of making this application.

Engagement with Fish & Game North Canterbury

The following meetings have also been held with North Canterbury Fish & Game ('F&G'):

- Site visits were completed on the 22nd of March 2021 and on the 14th of February 2023. AIC and F&G staff were in attendance; and
- A meeting was held on 28th of June 2023 to discuss F&G's review of the relevant technical reports. F&G signalled that it would provide written feedback following that meeting, but none has been received to date. At the meeting F&G expressed its preference for the replacement fish screen to be located closer to the river than is proposed and requested a meeting with other interested parties to discuss why this option wasn't pursued.
- A meeting was held with representatives from F&G, DoC and CRC on 29 January 2024 with AIC and its technical experts to outline the research undertaken and decision making behind the fish screen location and design.

Engagement with Neighbouring Properties

On the 4th of April 2022 an initial letter was sent to the neighbouring properties of the proposed BWSF. Subsequently AIC's Business Services Manager met with all affected parties individually to discuss the proposal and address any concerns landowners had. Written approvals are now held by all affected parties living in the area surrounding the BSWF as well as Mainpower (NZ) Limited and the HDC as utility suppliers and New Zealand Transport Authority as the roading authorities.

Engagement with the Department of Conservation

Draft copies of the various technical reports and assessments were shared with the North Canterbury Operations Manager and RMA team of the Department of Conservation ('DoC') in early May of 2023. DoC's RMA team has reviewed the information provided and did not have any specific comments in relation to the proposal at this stage. DoC's Freshwater Team provided some guidance documentation on fish passage and noted the IrrigationNZ fish screen design work. That documentation has been passed on to NIWA and Riley, who are the principal advisors to AIC over the design of the proposed replacement fish screen. DoC has provided its s95(e) approval for the BWSF and fish screen. Representatives from DoC also attended a Fish Screen information workshop on 28 January 2024.

Engagement with River Users

Jet Boating New Zealand and the Canterbury Jet Boat Association were advised of the project in November of 2022. Copies of the draft technical reports and assessments were sent to both parties in early May of 2023 for their consideration and comment. No feedback has been received.

Two kayaking clubs who use the Hurunui River were also sent copies of draft technical reports and assessments in early May of 2023. Feedback was

received from the University of Canterbury Canoe Club Captain stating that the water taken from the Hurunui River occurs at a point below the section that they kayak and therefore this Proposal will not affect club members' recreational use of the river. They also noted that they, as a club, try to be environmentally conscious but as the Proposal does not negatively affect their recreational use of the river, they did not have any requirements or requests.

Engagement with Transpower

The proposed BWSF is classified as a large dam. The PIC for the BWFS recognised the potential for damage to Transpower assets if the pond was to breach. AIC has been working with Transpower and their advisors to undertake detailed assessments regarding risk to Transpower assets. This work is ongoing.

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Describe any processes already undertaken under the Public Works Act 1981 in relation to the land or any part of the land on which the project will occur:

Please write your answer here:

Not applicable

Section 4: Iwi authorities and Treaty settlements

What treaty settlements apply to the geographical location of the project?

Please write your answer here:

Statutory acknowledgement areas are listed in Schedules 14 to 77 of the Ngāi Tahu Claims Settlement Act 1998 ('NTCSA'). Schedule 21 of the Act states: "The statutory area to which this statutory acknowledgement applies is the river known as Hurunui, the location of which is shown on Allocation Plan MD 112 (SO 19848)".

The river is located approximately 1.2 km south of the BWSF Site.

The NTCSA records that both Te Ngāi Tūāhuriri Rūnanga (whose rohe is, we understand, centred on Tuahiwi and extends from the Hurunui to the Hakatere River and inland to the Main Divide) and Te Rūnanga o Kaikōura (whose rohe extends from White Cliffs (which are to the south of Blenheim) to the Hurunui River and Southwest of the Main Divide) have cultural values associated with the area. However, no values have been associated with the project area specifically. Both Rūnanga have a shared kaitiaki (responsibility) and rights for the Hurunui River as a statutory acknowledgement area, meaning both Rūnanga have shared values and association.

Ngāi Tahu purchased the Balmoral Forest Estate from the Crown using economic redress provisions in the Deed of Settlement as an investment to restore tribal welfare. As a Settlement Asset located in the takiwā of Ngāti Kuri, Te Rūnanga o Kaikōura has a strong interest in ensuring that the property is developed in a manner that upholds Ngāi Tahu values and benefits future generations.

Ngāi Tūāhuriri Rūnanga

The Mahaanui Iwi Management Plan ('MIMP') records the values and areas of significance for six Tangata Whenua groups, one of which is Te Ngāi Tūāhuriri Rūnanga. The MIMP identifies that the entire Hurunui catchment is recognised by Tangata Whenua as possessing outstanding cultural characteristics and values. In particular the MIMP states that mahinga kai; natural character; wāhi tapu and wāhi taonga; hoka kura; the river mouth environment; and Ara tawhito ki pounamu are of significance. The following excerpts from the MIMP explain these identified values:

The Hurunui River possesses a range of characteristics that are outstanding for spiritual, cultural and environmental reasons. These characteristics were identified and discussed at length in Ngāi Tahu submissions and evidence in response to an application for a Water Conservation Order on the Hurunui River and Hoka Kura by the NZ and North Canterbury Fish and Game Councils and the NZ Recreational Canoeing Association (2009). They include:

Natural character: The Hurunui River is one of the few braided rivers in the Ngāi Tahu takiwā that is not significantly modified and/or degraded. The upper catchment has a high degree of natural character. The diversity of character of the river is also a significant natural characteristic. The haupua at the mouth of the river is an outstanding landscape due to its unusual character and high biodiversity and habitat values.

Mahinga kai: The mahinga kai values of the catchment were particularly important to Ngāi Tahu parties travelling to the Te Tai Poutini. Traditionally the river was known for tuna and iinanga. Raupo from the margins of the upper catchment lakes was used for making mokihi. The dried leaves of ti kouka, known as pahau, were used along with harakeke and mountain grasses to weave paraerae (sandals) for travellers, and the kauru, or pith of the tree was a food source. Harakeke was used to make clothing, baskets, nets, mokihi, and rope ladders. The NTCSA 1998 also recognises two Nohoanga in the catchment (Hoka Kura and the Hurunui River mouth), acknowledging the importance of the river as mahinga kai.

Cultural heritage values: Wāhi tapu and wāhi taonga values exist along the length of the river. The Hurunui River mouth is particularly rich in terms of archaeological evidence, as a moa hunter site occupied 700 years ago. Hoka Kura/Lake Sumner, the Waitohi River, and the gorges above the Mandamus confluence (including Maōri gully) are also areas of particular significance for their wāhi tapu status.

Te Rūnanga o Kaikōura

Te Rūnanga o Kaikōura Environmental Management Plan ('TRoKEMP') captures the project area within Okarahia ki te Hurunui. The TRoKEMP describes ngā take and ngā kaupapa associated with the lands, waters, mahinga kai and biodiversity within Okarahia ki te Hurunui. This includes the Okarahia (Hundalees) natural landscape, from Tuātae Putaputa (Conway River) to the Hurunui, and inland to the main divide. The area includes the catchments of three large rivers: Tuātae Putaputa, Waiau and Hurunui. Historically, the Hurunui River was treasured for its yield of customary resources, and as the gateway for Ngāi Tahu to the pounamu resources of Te Tai Poutini. Today, the customary importance of the river remains for Tangata Whenua.

Mahinga kai, wāhi tapu and other taonga are said to be of paramount importance within the TRoKEMP, being the cornerstone of the spiritual, historical, cultural, social, and economic well-being of Ngāi Tahu. For Okarahia ki te Hurunui, the key issues are the ability of freshwater and soil resources to meet current and future demands. The TRoKEMP also states that Te Rūnanga o Kaikōura aim to protect the productive capability and life supporting capacity of these resources.

Are there any Ngā Rohe Moana o Ngā Hapū o Ngāti Porou Act 2019 principles or provisions that are relevant to the project?

No

If yes, what are they?:

Are there any identified parcels of Māori land within the project area, marae, and identified wāhi tapu?

No

If yes, what are they?:

Is the project proposed on any land returned under a Treaty settlement or any identified Māori land described in the ineligibility criteria?

No

Has the applicant has secured the relevant landowners' consent?

No

Is the project proposed in any customary marine title area, protected customary rights area, or aquaculture settlement area declared under s 12 of the Māori Commercial Aquaculture Claims Settlement Act 2004 or identified within an individual iwi settlement?

No

If yes, what are they?:

Has there been an assessment of any effects of the activity on the exercise of a protected customary right?

No

If yes, please explain:

Upload your assessment if necessary:

No file uploaded

Section 5: Adverse effects

What are the anticipated and known adverse effects of the project on the environment?

Please describe:

Upload file:

Summary of Assessment of Adverse Effects form RCA.pdf was uploaded

Section 6: National policy statements and national environmental standards

What is the general assessment of the project in relation to any relevant national policy statement (including the New Zealand Coastal Policy Statement) and national environmental standard?

Please write your answer here:

- i. There are no NES's that are relevant to the Proposal;
- ii. The NPS-FM (2020) is relevant to the Proposal;
- iii. The NPS-IB (2023) is relevant to the Proposal; and
- v. The Site is not located in the coastal environment. Therefore, the New Zealand Coastal Policy Statement is not relevant to the Proposal.

NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT (2020)

The NPS-FM recognises the national significance of fresh water and sets the national policy framework for its use, management, and protection. The NPS-FM directs policy and standards to be implemented by Regional Councils, regarding freshwater management. An assessment of the Proposal has been made against the relevant provisions of the NPS-FM. The NPS-FM states that the health and well-being of our freshwater bodies is vital for the health and well-being of our land, our resources (including fisheries, flora and fauna) and our communities. The NPS-FM seeks to achieve this through national objectives and policies. Those objectives of relevance to the Proposal are outlined below.

We understand that the fundamental concept of the NPS-FM is Te Mana o te Wai, which refers to the importance of water and recognises that protecting the health of freshwater protects the health and wellbeing of the wider environment. Te Mana o te Wai encompasses six principles relating to the roles of Tangata Whenua and New Zealanders in the management of freshwater, which are:

1. Mana whakahaere: the power, authority, and obligations of Tangata Whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, freshwater.
2. Kaitiakitanga: the obligation of Tangata Whenua to preserve, restore, enhance, and sustainably use freshwater for the benefit of present and future generations.
3. Manaakitanga: the process by which Tangata Whenua show respect, generosity, and care for freshwater and for others.
4. Governance: the responsibility of those with authority for making decisions about freshwater to do so in a way that prioritises the health and well-being of freshwater now and into the future.
5. Stewardship: the obligation of all New Zealanders to manage freshwater in a way that ensures it sustains present and future generations.
6. Care and respect: the responsibility of all New Zealanders to care for freshwater in providing for the health of the nation.

The objective of the NPS-FM is to ensure that natural and physical resources are managed to:

- * Firstly, prioritise the health and wellbeing of water bodies and freshwater ecosystems,
- * Secondly, provide for the health needs of people, and
- * Thirdly, allow for people and communities to provide for social economic and cultural wellbeing now and in the future.

We are of the opinion that the BWSF and the proposed replacement fish screen can both be advanced in a manner that is consistent with the three outcomes sought by the NPS-FM's objective. In this regard:

1. The proposed fish screen replacement represents a very significant capital investment by AIC, and one which will see more fish returned to the Hurunui River. This aspect of the Proposal fits squarely within Limb 1(a) of the Objective. While the BWSF does not have, on its own, the same health and wellbeing benefits for waterbodies and watercourses, the Company has been very careful to understand the environmental values that are supported by the water courses and bodies in proximity to it and to take advice from some of New Zealand's leading experts as to how (i) all adverse effects can be avoided in the first instance, and remedied / mitigated where avoidance is not practicable, and (ii) what ecological benefits can be generated to more than offset the adverse impacts associated with the construction and operation of the BWSF. This approach, in our opinion, prioritises the health and wellbeing of the waterbodies and freshwater ecosystems (and the terrestrial ecosystems and other environmental values that are present);
2. The advice of Mr Hughes, geohydrologist, leads us to the opinion that both aspects of the Proposal will not unacceptably impact on groundwater quality. Given this and Ms Pallard's (aquatic ecologist) advice in relation to surface water quality, we are of the opinion that the Proposal can be advanced so as to provide for the health needs of people; and
3. By excluding fish from the irrigation scheme and better enabling their return to the Hurunui River, and enabling water to be stored and used in an irrigation scheme (with a consequential increase in the minimum flows that are left in the Hurunui River in some months), we are confident that the Proposal will enable people and communities to provide for their social, economic and cultural wellbeing, both now and into the future. Indeed, the BWSF effectively 'future proofs' the AIC scheme, in a manner that is expected to improve the environment within it will sit. The proposed replacement fish screen represents a benefit, we understand, for at least those fishing in the Hurunui River. Cultural and ecological benefits are also expected to arise.

In addition to this, policies 1, 2, 3, 4, 5, 6, 7, 9, 10, 12, 14 and 15 are relevant to the consideration of the proposal.

As identified in the preceding sections of this report, and the technical assessments undertaken in support of it, the Proposal has been considered in a holistic manner, ensuring that the effects of all the proposed activities are thoroughly understood. The conclusion of these assessments is that the Proposal will not result in adverse effects on the environment that are considered unacceptable. In addition, the installation of the BWSF and fish screen will facilitate the more efficient utilisation of water and result in increased minimum flows for the Hurunui River. Further, the quality of water stored within the BWSF will be managed to ensure that any water quality effects can be remedied or mitigated should they arise. As such, we understand that resulting water quality will not be inconsistent with the Balmoral irrigation race, or the wider catchment.

Mr Hughes (geohydrologist) also notes that leakage from the BWSF is unlikely to result in adverse water quality effects in underlying groundwater. Indeed, he advised that the leakage is more likely to generate a net benefit due to the dilution of contaminant concentrations (across the wider aquifer system) that will arise from it. Mr Hughes opines that with mitigation measures in place, the quality of stored water will be maintained and will not have adverse effects on groundwater.

With regard to Policy 6, Ms Pallard's (aquatic ecologist) technical review notes that the nearest potential wetland is located southwest, and within 200m of the Site, located on the true right side of the Balmoral irrigation race (i.e., opposite side to the BWSF). AIC advises that this is a reservoir used for firefighting and is therefore a 'constructed wetland'. As such, the provisions related to natural wetlands within the NPS-FM do not apply to the Proposal.

Policy 7 states that the loss of the river extent and values is to be avoided to the extent practicable. Given its distance from the various surface watercourses, the care that is being taken to prevent or control sediment discharges to air and water, and the projected groundwater quality implications

associated with the BSWF, we are confident that the proposed reservoir will not cause the loss of the 'extent' of any river, or its values (be they cultural, recreation, natural character, landscape, aquatic ecology, and terrestrial ecology).

The proposed replacement fish screen is also not expected to reduce the extent of the adjacent river, although it will reduce the flows in the Hurunui River for a short distance (as water is diverted to improve the flow across the fish screen and thus the fish that are diverted and returned to the Hurunui River). Ultimately, the replacement fish screen is expected to see more fish returned to the river, which will, we expect, improve several of the values that are associated with it. Given these opinions, we are satisfied that everything practicable is being done to avoid the loss of the extent of any surface water courses and their values.

The Proposal is seeking to store water that is diverted and taken under existing resource consents. We are of the opinion that the BWSF will assist in maintaining water reliability and therefore efficient water use for AIC shareholders, consequently providing for the economic wellbeing of the community. The construction itself of the BSWF and ongoing maintenance will also provide employment opportunities.

As identified in the preceding sections of this report and the forthcoming assessment of the relevant IMP's, we are of the opinion that the Proposal is consistent with Te Mana o te Wai, as we know it (accepting that Te Mana o te Wai is in the process of being defined for Canterbury).

Further, the information from Riley leads us to the opinion that the proposed activities can be managed so as to ensure that the temporary effects resulting from the land disturbance activities will be appropriately mitigated. This will be achieved through the design and installation of erosion and sediment controls, and measures put in place to limit the discharge of sediment. As such, we are of the opinion that the development of the BWSF gives effect to the principles of stewardship, and care and respect for the management of freshwater in providing for future generations, and for the health of the nation.

Overall, we are of the opinion that the Proposal is consistent with the NPS-FM.

NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY (2023)

The National Policy Statement for Indigenous Biodiversity ('the NPS-IB') recognises the national significance of native biodiversity and sets the national policy framework for its maintenance and protection. The NPS-IB states that indigenous biodiversity is a key part of the nation's identity and provides recreation, tourism, and ecosystem services. It is important to note that the NPS-IB does not include the following as taonga: (a) aquatic species; (b) populations and ecosystems solely located in waterbodies; and (c) populations and ecosystems in the coastal marine area.

We understand the fundamental aim on the NPS-IB is to maintain indigenous biodiversity across Aotearoa New Zealand and this will primarily be achieved through the identification of significant indigenous biodiversity areas ('SNAs'). Importantly, a SNA is deemed to be land that supports significant communities of indigenous species. Any adverse effects on these areas will be managed through the NPS-IB which directs policies and standards to be implemented by councils to establish consistent approaches to maintain indigenous biodiversity. This will be achieved through national objectives and policies and the relevant objectives to the Proposal are outlined below.

The objective of the NPS-IB is to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and to achieve this:

- through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and
- by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and
- by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and
- while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.

In addition, policies 1, 2, 3, 4, 5, 8, 10, 13, 14, 16, 17 are relevant to the consideration of the proposal.

Mrs Godfrey's (ecologist) has concluded that the overall ecological effects associated with the BWSF are 'Low'. With regard to Policy 8 and 17, Ms Godfrey notes that Site and the surrounding area is already extensively modified by a forestry plantation and retains little to no natural habitat, or indigenous terrestrial communities. Ms Godfrey also notes that no part of the Site has been identified as a SNA according to Environment. Further to this, ecological surveys undertaken by Ms Godfrey indicate the sites avifauna community is dominated by introduced species and all four of the indigenous species have a "Not Threatened" conservation status.

With regard to Policy 3 and 13, Ms Godfrey (ecologist) notes that areas of active lizard habitat (which are of note) will be lost within the project Site and that one At Risk – Declining species, the Southern Alps gecko, was identified at the Site. She records, however, that lizard salvage and habitat restoration are proposed and that these measures will minimise the effects of the Proposal on the herpetofauna that are present. Further, Ms Godfrey also recommends that a 5-hectare area of native rehabilitation planting be established to offset the loss of the terrestrial values that are to be replaced by the BWSF. Given the current lack of habitat and indigenous biodiversity within the project area and immediate surrounds, we understand Mrs Godfrey's advice to be that this would increase indigenous biodiversity and improve habitat quality for local populations of lizards and avifauna around the BWSF.

Given Mrs Godfrey's advice, we are satisfied that the Proposal can be advanced so as to be consistent with the directions advance by, and the outcomes sought within the NPS-IB. Overall, it is considered that the Proposal is consistent with the NPS-FM.

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Section 7: Eligibility

Will access to the fast-track process enable the project to be processed in a more timely and cost-efficient way than under normal processes?

Yes

Please explain your answer here:

In accepting this proposal into the fast tracking process, the Ministers will accelerate the construction of a key addition to existing regionally significant infrastructure.

Existing irrigation schemes in Canterbury are considered regionally significant due to the economic benefit provided to the region's economy. Water storage provide significant benefits to existing irrigation infrastructure by providing increased resilience during periods of dry weather or drought conditions.

Regional climate change projections suggest there will be:

1. Generally more variable rainfall within any year (and therefore a reduction in the reliability of supply of water) and increases in summer temperatures (and therefore increased evaporation and irrigation demand).
2. Decreases in winter rainfall on the east coast (and therefore a decrease in groundwater recharge from rainfall).
3. Increases in rain in the Alps and less snow (and therefore reduced summer base flows and greater flow variability in alpine rivers).

Additional irrigation water also has the potential to increase the versatility of our production systems and resilience of the economy, especially if the projected changes in weather patterns resulting from climate change, occur.

The Canterbury Regional Policy Statement 2013 notes that Canterbury's industrial and agricultural base is growing¹ and if the region becomes drier, improvements in water use efficiency along with more irrigation will be needed to maintain existing and enable future primary production activities to occur.

Every year that this project is delayed, prevents the benefits of the project being realised for both the environment and AIC. The cost of the project has been forecast in AIC's long term plans for nearly a decade and actioning this project will solidify that cost and allow farmers to move on to future strategic planning in their on-farm businesses for succession, diversification or alternative land development.

What is the impact referring this project will have on the efficient operation of the fast-track process?

Please write your answer here:

AIC has been working to advance this project for years with the support of the community and stakeholders. The consenting stage is one of the most uncertain components of its development. Consenting delays has already impacted the programme of works and CRC and the HDC have consenting backlogs which may continue to affect advancement of the project.

The fast-track process offers an effective means to advance a project where an applicant has taken the time to carefully design a proposal, consider the opinions of others and engage recognised experts to consider it, as is the case for this proposal. Acceptance into the fast-track process would give certainty to AIC to move forward with construction as soon as practicable without incurring additional delays in an environment where costs are constantly moving.

Has the project been identified as a priority project in a:

Local government plan or strategy

Please explain your answer here:

All of the above.

The Coalition Government has noted that more water storage is key to raising productivity and export earnings and has indicated that new legislation will be introduced creating water storage on private farmland as a permitted activity.

The Ministry for Primary Industries' 'Fit for a Better World' notes that it is a goal of Government to move to higher value land uses that deliver greater export revenue per hectare and per cubic meter of water used. Delivering highly reliable water to the primary sector is a critical enabler of moves to higher value land uses of which water storage is key.

Water Storage is recognised as a more efficient use of freshwater in Canterbury's resource management planning frameworks. This begun with the Canterbury Water Management Strategy in 2011, which stated:

The Canterbury Water Management Strategy (updated July 2010) (CWMS) has been developed to foster a collaborative approach to managing water within the region, considering the many and often competing values and uses of fresh water. The strategy is the product of a collaborative approach by local authorities, central government agencies, users of fresh water and groups representing various interests and viewpoints on fresh water management within the community.

The CWMS is based on a concept of total or holistic management of water² environmental protection and restoration or enhancement proceeds in parallel with abstraction and use of water, greater efficiency in water use, and, where appropriate, developing water storage and distribution infrastructure.

The CWMS has three components:

1. Outcomes, being a vision, principles, and targets for water management□
2. Delivery mechanisms to achieve those targets, for example water harvest and storage schemes and biodiversity protection and enhancement programmes□ and
3. A governance structure for delivering the CWMS, using community-based Water Management committees working collaboratively to develop solutions to water issues in each zone (or the region for the Regional Committee) which are acceptable to a broad range of interest groups in the community.

The Regional Water Committee and each zone committee are charged with preparing an implementation programme of actions to address fresh water issues in the region (Regional Committee) or their zone (Zone Committee). These programmes are known as the RIP (Regional Implementation Programme) or ZIPs (Zone Implementation Programmes).

Irrigation infrastructure is recognised in the Canterbury Regional Policy Statement 2013 as regionally significant. Water storage is recognised as a project in the Hurunui Water Zone Committee Zone implementation plan, 2011. This is carried through into the Hurunui Waiau River Regional Plan (HWRRP), which discusses the options for water storage and the cultural limitations of the options that were considered.

Since 2011, several options have been explored for water storage by multiple parties. This includes upper catchment and instream options and using flow restriction from Lake Sumner. The cultural value of the area to Te Runanga o Kaikoura and Ngai Tūāhuriri Runanga precluded this option, the HWRRP states:

Changes made to this Plan in response to submissions now preclude instream dam storage options for South Branch above Surveyor's stream and also for Lake Sumner.

The HWRRP includes mapped areas where water storage had been explored and discounted. The plan states:

This Plan shows in Map 3 how the areas of the Hurunui, Waiau and Jed catchments have been categorised in relation to their suitability for water storage infrastructure. Firstly, areas where water storage cannot be progressed due to the high values within these areas are shown as Zone A, and damming within these areas is prohibited. Those areas identified as Zone B are areas where water storage infrastructure may be appropriate as long as a range of environmental, cultural and recreational effects are addressed, and less environmentally sensitive areas have been explored and proven to be impracticable or unaffordable. Those areas that have been identified as generally being more suitable for development of water storage infrastructure are shown as Zone C. Finally, Zone D identifies areas where only limited investigations have been carried out as to the suitability of water storage.

Will the project deliver regionally or nationally significant infrastructure?

Regional significant infrastructure

Please explain your answer here:

The proposal will be an upgrade to the existing Amuri Irrigation Company infrastructure. Both the existing infrastructure and the proposed storage facility are recognised as regionally significant for Canterbury. This is reflected in the regional planning documents, the Canterbury Regional Policy Statement (CRPS) outlines the importance of irrigation to Canterbury:

Canterbury also contains over 70% of New Zealand's irrigated land. In 2009, approximately 500 000 hectares of rural land was irrigated in Canterbury. There is potential to increase both the area of land under irrigation and improve the reliability of supply□ with associated economic benefits to local communities and the regional and national economies. Additional irrigation water also has the potential to increase the versatility of our production systems and resilience of the economy, especially if the projected changes in weather patterns resulting from climate change, occur.

The CRPS also states:

Improving reliability of supply is also an important tool to improve efficiency of water use. Unreliable water supplies can lead to inefficient water use if people use more water than they need when it is available, to try and reduce the impacts of water restrictions when they are applied. Reliability of supply can be improved through the taking and storage of water during freshes.

Established irrigation infrastructure is recognised in the Canterbury Regional Policy Statement (CRPS), 2013, as regionally significant. Chapter 5 of the CRPS states:

Existing and consented community-scale irrigation, stockwater and rural drainage infrastructure are important to Canterbury's rural economy. They contribute significantly to Canterbury's well-being, are the subject of considerable public and private financial investment, and are unlikely to be readily replaced or duplicated.

Will the project:

Please explain your answer here:

No, it will not contribute to these objectives.

Will the project deliver significant economic benefits?

Yes

Please explain your answer here:

The development of the BWSF for irrigation purposes is considered to support the AIC Scheme which is recognised as regionally significant infrastructure. There is significant economic benefits to our primary producers and the communities they supply. This benefit is from surety supplied from reliable irrigation water.

Irrigation plays a pivotal role in ensuring a reliable and sustainable food supply chain. By providing water to agricultural lands during ever increasing dry seasons, not just during extreme droughts, irrigation enables farmers to produce crops consistently. Resilient irrigation infrastructure ensures that communities have access to food, reducing the reliance on unpredictable weather patterns and disrupted imported food supply chains. During times of crisis or extreme weather events, a robust irrigation system can act as a lifeline, helping maintain food production and supply.

Irrigation has enabled conversion of land use in AIC's drought-prone basin from predominantly a mix of sheep-beef and cropping to higher value dairy production, to become one of the country's most productive dairy areas. North Canterbury had the highest average herd production (343,077 kilograms of milk solids in 2022/23) in the South Island and New Zealand. The farms in Hurunui and the Amuri Basin average 370,921kgMS per herd.

Studies have shown that irrigation creates economic benefits that go beyond the farming industry to the owners and employees of businesses that service agriculture, and other businesses that benefit from increased incomes and local spending, and that it also contributes to wider regional and national wealth.

The construction of the BWSF will benefit those organisations, and their suppliers, that are engaged to build the BWSF. While AIC will only appoint a contractor(s) after it has completed a competitive tender process, it is reasonable to expect that several local entities will be engaged in the construction of the BWSF. This will benefit their social and economic wellbeing and is expected to generate economic multiplier benefits for the surrounding community.

Furthermore the upgraded fish screen will allow more fish to remain in the Hurunui River which will improve recreational fishery stocks and potentially allow improved recreational fishing and guiding in the area.

Will the project support primary industries, including aquaculture?

Yes

Please explain your answer here:

Irrigation provides support for primary industries. The BWSF will provide farmers with assurance of water supply during dry periods thereby supporting primary industries in the area it serves. Reliable water supply resilience has significant benefits for the primary sector and also benefits wider than the land within the immediate supply area.

The CRPS states:

The rural productive base of Canterbury is essential to the economic, cultural and social well-being of its people and communities. Enabling the use of natural and physical resources to maintain the rural productive base is a foreseeable need of future generations.

The ability to appropriately utilise natural resources is a vital element in supporting the efficient and effective rural productive activities.

Irrigation is a significant driver of economic stability and growth in Canterbury and New Zealand. The agriculture sector heavily relies on irrigation to maintain its productivity and competitiveness. A secure water supply through resilient irrigation infrastructure fosters economic activities, generates employment opportunities, and contributes to the overall economic prosperity and stability of the country.

This will, in turn, contribute to people and communities providing for their economic and social wellbeing, thereby, enabling a lawfully established abstraction of water to become even more efficient than it already is. The development of the BWSF will be a significant investment for AIC, which will support and provide resilience to the food producing capacity of the Hurunui and Canterbury economies. Food security and consistency in production will support the wider national and export economies.

The fish screen will address a long-standing adverse effect of the irrigation scheme. In summary, both aspects of the proposal will future proof regionally significant infrastructure which is a foundation of the North Canterbury economic and social / cultural fabric, while reducing adverse effects that have been caused.

Will the project support development of natural resources, including minerals and petroleum?

Yes

Please explain your answer here:

The project will support the existing land use in the Amuri Basin. The project will future proof the continued use of water which is needed to enable farming activity in Amuri Basin.

The Proposal will enable water to be stored for use when it is required. In that regard, the Proposal will provide for drought resilience for AIC shareholders, which allows the environmental flows in the Hurunui River to be increased to the flows set in the HWRRP without any significant reduction in reliability of supply.

Will the project support climate change mitigation, including the reduction or removal of greenhouse gas emissions?

Yes

Please explain your answer here:

Canterbury has significant freshwater resources. However, due to the climate and geography of the region, water is not always available in the required places at the required time. Reliability of supply is therefore a key issue for irrigation in the region. Harvesting and storage of water during periods of high flow and the development of associated distribution systems is the only way to address the issues that eventuate because of unreliable 'run of river' abstraction during periods of low flow. Climate change predictions mean the current scenario will become more challenging over time. New Zealand faces a slow-moving but significant impact of climate change, it therefore becomes essential to focus on strengthening critical infrastructure across all sectors, including irrigation for food production. Climate change will have an impact on agriculture. Water storage seeks to mitigate the effect of climate change by addressing the effects of changes in weather patterns and the impact of long dry periods on our farming activities.

Will the project support adaptation, resilience, and recovery from natural hazards?

Yes

Please explain your answer here:

The Ministry for the Environment anticipates that climate change will result in a reduction in rainfall and snow melt, resulting in extended dry periods throughout the year. This will result in extended low flow periods in the Hurunui River. Water storage creates resilience for farmers during drought, especially in modern fit for purpose infrastructure. Water is taken during high flow events, to reduce any impact the river flow and stored water creates resilience during periods of low river flow or extended drought conditions. AIC's water diversion and take resource consent requires abstraction to cease when river flows drop below specified levels. The BWSF will allow AIC to abstract water from the river during high-flow periods and store it for release into the irrigation system when the river flows are low and abstraction is stopped. In this way, the storage facility provides resilience to the system and reduces the risk of irrigation farmers being affected by climate change induced drought.

AIC contributes to the health and wellbeing and resilience of our communities through the provision of irrigation to the Amuri Basin to support consistent food production. Irrigation provides resilience to our farmers and producers by ensures consistent production year on year reducing uncertainty from fluctuating production and incomes caused by drought, but also serves as a means to collectively develop community and social infrastructure. Security in food production leads to food security across the motu, ensuring that products can be produced at a consistent price. Food security means that whanau have better health and wellbeing outcomes, as people have access to meet their basic nutritional needs.

Will the project address significant environmental issues?

Yes

Please explain your answer here:

The BWSF will provide for storage for AIC shareholders, which allows the environmental flows in the Hurunui River to be increased to the flows set in the HWRRP without any significant reduction in reliability of supply. As we have noted, the fish screen, which is world leading in its design, will address a long standing ecological effect, and in doing so benefit the recreational / sports fishery.

Is the project consistent with local or regional planning documents, including spatial strategies?

Yes

Please explain your answer here:

The Site is located within the Amuri Basin. The applicable resource management plans are the Hurunui District Plan ('HDP'), for activities governed by the territorial authority (HDC) and the Canterbury Land and Water Regional Plan ('CLWRP'), Hurunui and Waiau River Regional Plan ('HWRRP') and Canterbury Air Regional Plan ('CARP') for those activities governed by the regional authority (CRC).

The Site of the proposed BWSF and associated structures is located within the Rural Zone in the Hurunui District Plan. The Site is located within the fault awareness zone; however, it is noted that rules in Chapter 15 (Natural Hazards) do not apply to utilities. The BWSF itself is captured as a utility under the HDP, being a facility related to the distribution of water. Resource consent for the construction and operation of the BWSF is required for several activities under the Hurunui District Plan.

The site of the existing fish screen and, therefore, the proposed replacement screen, is within the Flood Assessment Zone and Fault Awareness Zone identified in the HDP. In addition, it is within the vicinity of the Hoka Kura Awa (Lake Sumner) Nohoanga site and within the Hurunui Awa (Hurunui River) Statutory Acknowledgement Area. The assessment of the Proposal against the applicable provisions of the HDP concludes that resource consent is required for the construction and operation of the replacement fish screen for several activities.

The HWRRP identifies that the Site is located within Development Zone C of Map 3 and within the Culverden Hurunui Groundwater Allocation Zone in Map 2. Resource consent for the construction and operation of the BWSF is required for several activities under the Hurunui and Waiau River Regional Plan.

The CLWRP reveals that the Site of the existing fish screen and proposed replacement screen is downstream of Peaks Rural Water Supply Community Drinking Water Zone and upstream of Hawarden Community Drinking Water Zone. The location is considered to be Braided River Bird Habitat, Native Bird River and Open Water Habitat, Site of Special Wildlife Significance, a Department of Conservation Public Conservation Area: Marginal Strip- Hurunui River, and a wetland of representative importance (the Hurunui River). As we have already noted, there is a statutory acknowledgement over the area (Ngāi Tahu) and the location is over a confined or semiconfined aquifer. Resource consent for activities associated with the installation of the proposed replacement fish screen will be required under the CLWRP.

No outstanding natural features/landscapes ('ONFL's') have been identified within the project area at a district or regional level. Under the Canterbury Regional Policy Statement Regional Landscape Study Review, prepared by Boffa Miskell Ltd in 2010, the hill ranges west to northwest of the Hurunui River and BWSF are the closest ONFL. No other ONFLs are identified within the Amuri Plain, or across the foothills west of it. The HDP also identifies ONFL's west of the Amuri Plain beyond the confluence of the Hurunui and Mandamus Rivers. A small ONFL within a vegetated valley system in the Tekoa Range is identified, however, Mr Brown (landscape and visual assessment specialist) states that the pine covered foothills and the greater bulk of the farmed Tekoa Range provide a substantial buffer between these ONFL's and the area around the BWSF. The project area is approximately 3.5km from the nearest ONFL at its closest point. The HDP also identifies that fairway and low-lying terrace margins of the Hurunui River as being within the 'flood assessment zone', however no other values or significant characteristics are present for the Site, or surrounds.

Anything else?

Please write your answer here:

Does the project includes an activity which would make it ineligible?

No

If yes, please explain:

Section 8: Climate change and natural hazards

Will the project be affected by climate change and natural hazards?

Yes

If yes, please explain:

AIC's abstraction records indicate that the volume of water taken varies from month to month and from year to year. In summary, the abstraction record reflects the climatic conditions that are being experienced. The Ministry for the Environment anticipates that climate change will result in a reduction in rainfall and snow melt, resulting in extended dry periods throughout the year. AIC expects that this will result in the need for it to abstract water (for irrigation) year-round. AIC and the CRC are agreed that Resource Consent CRC951326 allows for this to occur.

The Proposal will result in the BWSF being constructed within an identified hazard awareness area as per the Hurunui District Plan (HDP). Fairway and low-lying terrace margins of the Hurunui River are within the 'flood assessment zone' in accordance with the HDP. There is no external contributing catchment to the BWSF, therefore only rain falling within the reservoir can generate flooding. A spillway will be installed on the BWSF to control discharges during major floods. Ultimately the location of BWSF is not anticipated to inhibit the carrying capacity of the Hurunui River or result on increased inundation of adjoining properties. Existing infrastructure, such as the intake structure and Balmoral irrigation race, has not been considered in terms of natural hazard impact as it is part of existing operations.

The Site is located within a seismically active region. As such, seismic resilience has been considered as an important design consideration for the BWSF. No identified natural hazards such as active faults, liquefaction, flooding, and wind have been determined as 'fatal flaws' for the BWSF Site. While no active faults have been identified within the BWSF footprint area, several faults have been identified nearby, with the closest to the Site being the Hurunui Peak Fault Zone – Waitohi Downs Fault. This fault extends along the toe of the Hurunui Peak, 1.5km north of the Site. Interpretation of seismic results revealed no evidence that the features are active faults, but there was some evidence of paleochannels. There is no clear evidence to demonstrate that a scarp feature at the Site is fault related. There is also no clear evidence as to whether the paleochannels resulted in the formation of the scarp, or if the paleochannel was 'trapped' by active tectonic movement. As such, Riley have not identified any specific geological or geotechnical conditions that could prohibit the safe and cost-effective construction and operation of the BWSF.

Section 9: Track record

Please add a summary of all compliance and/or enforcement actions taken against the applicant by any entity with enforcement powers under the Acts referred to in the Bill, and the outcome of those actions.

Please write your answer here:

Resource Consent CRC951327 related to AICs Balmoral take. Condition 2 related to the fish screen. In June 2021, CRC issued AIC with a formal warning related to a significant non-compliance of CRC951327 Condition 2 (failure to ensure effective seals), a non-compliance CRC951327 Condition 2 (apertures not small enough) and a non-compliance CRC951327 (operation).

In September 2021 CRC identified a number of non-compliances between screen material and operations and maintenance and required AIC to take action by 30 September 2022. These related to CRC951298 – Waiareka – Condition 2 - screens need cleaning, CRC51305 – Waiau – screen apertures not small enough (mesh which is < 3mm to be installed) and CRC951327 – Balmoral - screen apertures not small enough, and seals compromised (mesh which is < 3mm to be installed)

AIC responded by Barrister's letter in November 2021 noting that the design of the fish screens does meet current consent conditions.

In February 2023, CRC downgraded the significant non-compliance for the Balmoral fish screen (CRC951327) to non-compliance action required and confirmed that for CRC951298 – Waiareka Downs – Condition 2 – new fish screens had been installed and were now compliant. CRC was unable to determine compliance with CRC951298 Condition 3 – Fish bypass channel. AIC is, in consultation with CRC considering moving this fish screen to ensure

better outcomes.

This Proposal will address the issues at the Balmoral take fish screen.

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Declaration

Do you acknowledge your submission will be published on environment.govt.nz if required

Yes

By typing your name in the field below you are electronically signing this application form and certifying the information given in this application is true and correct.

Please write your name here:

Sara Black

Important notes