

5 April 2011

LAND AND WATER FORUM: SUMMARY OF POINTS RAISED AT REGIONAL ENGAGEMENTS

1. The following is a summary of the points made by the approximately 1200 participants at the 18 regional engagements held in October and November 2010, and February and March 2011 to discuss the report of the Land and Water Forum. The summary also reflects the views of a small number of people who were not able to make a particular engagement meeting and emailed their views through, the views of a workshop held on the Forum's report by the New Zealand Freshwater Sciences Society, and attended by 3 Forum members, and discussions held by the Chair with a number of groups, including Ingenium, the New Zealand Council for Infrastructure Development, and a number of regional and territorial councils.
2. The format of the engagements started with a short overview of the Forum's report by a range of Small Group members, followed by a discussion with participants in smaller groups facilitated by Forum members. The groups allowed participants to offer their own views and ideas, and raise issues stemming from the Forum's report and to debate them with each other.
3. The engagements were attended by a high number of farming leaders, leaders from other industries (horticulture, viticulture, forestry), regional council chairs and chief executives, mayors and councillors, many regional and district council staff, local environmental leaders, representatives of iwi interests, and interested members of the public.
4. It is difficult to do justice in a few words to the depth and breadth of the contributions made during the 18 engagements. The discussions were eager and cordial. The meetings offered a diversity of perspectives and made Forum members conscious of regional particularities and the strength of the engagements on water issues that occur in a variety of places.
5. This is not an attempt to summarise in detail all of the points that were made during the engagements and does not capture all of the local nuances that were heard. Full notes were taken of the discussions and are on the Forum's website. This paper reports on the major themes and emphases of the discussions.
6. The themes most commented on in the engagements were setting standards, limits and targets for quantity and quality and how those might be achieved, allocation, and changes to governance. Next most numerous were comments on rural water infrastructure, science, water services management, collaboration, and the operation of the Forum. Other subjects were covered to a much smaller extent.

General

7. In general, the report was welcomed as good progress in an area where governments had not made much for a number of years. Many felt that the report was a positive step forward, exciting and encouraging, and balanced and proactive. These reactions ranged from those that

wholeheartedly supported the report and were impressed with the recommendations, to those that saw the report as having made a good start, but on which there were significant matters of detail that would need to be fleshed out. There was considerable interest in the next stage and how the high level recommendations would be implemented, including whether the Government would implement them. The collaborative approach adopted by the Forum was felt to be positive. In general there was a view that the Forum had done well and an expectation that it would continue in some form.

8. We did not expect and did not receive unanimous agreement with the Forum's report. Participants in general however had little disagreement with the recommendations, and recognised the need for change. There was a strong sense that the recommendations sketched out the middle ground. While the 'devil was in the detail', there was a strong sense of a need for action – there was no reason to hang back with implementation. Mixed with this though was a sense of anxiety about the next steps and what might emerge from them – what the details of standards, limits and targets, or what alternative allocation systems might look like, and what the implications of that might be for water users and communities.
9. A minority of views expressed some disappointment with the report, for a variety of reasons. Most of these related to the overall balance and/or direction of the report – for example, some felt that the report was too focussed on water as an economic resource and did not sufficiently take into account sustainability or environmental issues. Others claimed that the report did not sufficiently recognise the importance of the economic use of water to New Zealand. There was some frustration that the report had not gone far enough, or that it was too high level in scope.
10. There were a few comments on the Forum's composition – a number felt that women and young people had not been sufficiently represented.

Need for leadership and action

The report was welcomed as good progress in an area where governments had not been effective. Central and local government should 'get on with it' and the government needed to provide a clear statement about direction and implementation. National leadership and direction was essential.

There was considerable interest in how the high level recommendations will be progressed in detail.

11. Most participants agreed that there was a need for action by central and local government in water, across a number of fronts from improving water quality, to reducing over-allocation and improving allocative systems, to improving storage. Many feared that decisions would be put off, that the government would not act on the recommendations, and that a further opportunity to make progress on water would be wasted.
12. There was a strong sense that both central and local government should 'get on with it'. The government needed to provide a clear statement about 'where to next'. A sense of urgency

was required. This was linked to recognition that implementation would not be simple and would take time, including because the recommendations involved action by the regions.

13. A number of participants believed that national leadership was needed, including to ensure that the reforms happened, for national consistency, to set national priorities, and to ensure that there is a national database for water. Successive governments and departments were criticised for insufficient national leadership and guidance.
14. Leadership was also needed in local areas to resolve local issues, and recognise social and physical variability in catchments. Community buy-in and local ownership of decisions as well as national leadership was needed.

Scope of the Report

15. Most comments on scope focussed on the relationship between land and water. Everyone recognised that it was key. Some thought that it was well reflected - 'the integration of land and water is good to see' and there is a 'good understanding that the system is integrated'. Some thought it was insufficiently recognised - 'should have had more on land and water management' and 'hedging the question of the use of land relative to water use'.
16. There were a range of matters that people feel could have been covered in the report, or should have been covered more extensively. These are set out in the attached Appendix.

Iwi

There was little opposition to the notion that iwi needed to be able to participate in a practical way in decisions about water.

17. There were a range of issues raised in relation to iwi, primarily to do with governance and water quality, although some mention was made of iwi rights and interests. There was a widespread view that the participation by iwi in the Forum was positive though in a few cases participants raised anxieties that iwi would seek to impose inappropriate charges on land users. The main issues were:
 - Maori have a clear concern over declining water quality in New Zealand – this expresses itself in variety of ways including through the decline in the mauri of waterbodies, mahinga kai and native fish species
 - Increased involvement in governance by Maori is a positive step forward
 - Maori rights and interests in freshwater need to be addressed
 - A collaborative approach is a positive and welcome development
 - Issues of water transfer, longer permit periods, and Public Private Partnerships raise particular issues for Maori that should be the subject of further dialogue

- Maori have a range of interests in water, including covering all four wellbeings, and greater recognition of cultural values was needed.

Intergenerational thinking

An intergenerational perspective was needed in water management.

18. There was general acknowledgement that an intergenerational perspective was required. There were a number of themes to this – the intergenerational attitude of iwi, the need to preserve water resources and environments for future generations, and the timeframes required to improve water quality.

Limits, Standards and Targets for Water Quality and Quantity

There is a need to protect and enhance water quality, and standards, limits and targets are needed.

Economic, environmental, social, and cultural impacts need to be assessed as part of the standards setting process.

Setting standards, limits and targets needs to be guided nationally, but should also reflect local catchments and local values.

The transition needs to be carefully communicated and managed.

19. There was general acceptance of the need to protect and enhance water quality, which had declined over time with ecological and recreational impacts. Examples were given of areas where water bodies had declined and were no longer swimmable or drinkable, or where flora or fauna (particularly native species) had declined. Some saw an accelerating pace of decline which needed to be urgently reversed. Views differed about the extent of the problem, and the predominant causes. On the extent and causes of the problem there was what in the experience of Forum members is a not unusual range of views, covering the sources of nutrients (intensive farming to gorse), the relative contribution of agriculture, industry, contaminated sites, septic tanks and urban users, the relative significance of diffuse discharges, and the contribution of abstraction. People ascribed increasing levels of sediment to various causes including forestry and lifestyle blocks, and raised the permitted activity status of culverting, and the role of ditches and drainage.
20. Participants generally agreed that standards, limits and targets were needed and provided certainty and clarity. Land use needed to be considered when standards, limits and targets, were developed, recognising the variations that exist between catchments and communities. National leadership in setting limits was seen as important, and the exact relationship between national guidance and local decision-making was debated. There was discussion on the technical

difficulty in setting limits, as well as the difficulty in arriving at community-agreed objectives (as some regional councils were finding out), the importance of a standardised process across the country, and the problem of cumulative effects. A few participants from regional councils questioned whether national guidance was needed.

21. There was substantial agreement that the economic and environmental impact of any standard needed to be assessed as part of the standards setting process (social and cultural impacts were mentioned less frequently). Which values should receive priority was regularly debated and most believed that a balance between competing values needed to be struck. A number of people believed the economic impact of improving water quality would be high, and some thought that the adjustment process and improvement would take a long time and should be implemented carefully. Actions should be focussed on where the 'best bang for the buck' was.
22. Some thought that the report did not contain guidance as to how the different economic and environmental values should be balanced, and adversarial processes lessened. Concerns were raised about whether non-market values could be assessed against market/economy values.
23. Some called for clear government direction on which iconic rivers and lakes should receive absolute protection or for the development of criteria for such waterbodies. There was discussion around the constraints on some forms of land use in some areas.
24. There was also discussion of a number of implementation issues:
 - the importance of good communication and a clear transition path
 - how the report translated into action at a regional level
 - the capacity of central and local government to do what was required
 - whether water quality could be managed without affecting landowners' property rights
 - an understanding was needed of how quickly changes could be made and the pace of adjustment by land and water users

Achieving Water Quality Targets/Good Management Practice

Good Management Practice (GMP) and Audited Self Management (ASM) are important means by which landowners can meet standards, limits and targets.

GMP and ASM need to operate within an overall regulatory and compliance framework, and also need good design, extension, and communication.

Central and regional government will need to develop expertise to ensure that regulatory frameworks encourage GMP.

A range of tools will be needed to achieve targets.

25. There was broad recognition that Good Management Practice had real merit as an approach to addressing water quality, as well as urban water management and water use efficiency. GMP was seen as an important part of water users 'owning the problem'. It was acknowledged that improved farm systems management would have a range of positive outcomes. There was widespread support for effective riparian management, and some felt it was not practical in some landscapes. There was some discussion of nutrient management and the need to address diffuse discharges and cumulative effects.
26. There was a range of views about the role of GMP and other tools to achieve targets. In broad terms, at one end GMP (and Audited Self Management) was seen as needing to operate within a strong regulatory framework that provided strong enforcement. Without this, some questioned whether the industry could adequately meet standards. Some at the other end thought that regulations can decrease land value, back people into a corner, and drive farmers out. Incentives for GMP were needed, and the emphasis on regulation saw gains at greater cost than encouraging GMP. It was noted that networks provided peer pressure and competition to leverage change.
27. The majority however saw the need for a mix of regulatory, industry, and non-regulatory measures. The concept of ASM and industry as part of the overall toolbox and compliance system was supported. There needed to be a mix of sticks and carrots, and a range of tools that might be catchment or sub-catchment specific.
28. There was discussion about how GMP could be made to work. There was substantial agreement that extension services, education, and involvement of farmers were all needed to a greater extent than currently existed. Advice to farmers needed to integrate environmental and economic objectives. GMP needed to be carried out differently in different catchments to suit different habitats and conditions, and good information and careful design and audit were important. There was some discussion about the need for farm-scale plans, with some noting that better farming systems could be both profitable and avoid increased intensification. There was concern that some regional councils acted in ways that was counter-productive to GMP, or that imposed excessive costs. There was concern that some councils may not be able to afford non-regulatory approaches, especially the up-front costs.
29. Views on the implementation of standards, limits and targets varied – some asked for more detail on where and how limits were set, and monitored, and what happens if they were exceeded. There was discussion over compliance strategies and whether the Minister and regional councils had all of the tools that they needed to get better water quality. There were some contributions on particular tools beyond GMP and regulation - the use of wetlands as a natural system, the use of a water class system, funding, and land retirement.

Allocation

There was agreement that quantity limits are needed to protect instream values, and that 1st in

1st served no longer worked in a growing number of catchments.

Further work is required on allocation and transfer options. There are a range of views about each option. This further work should explore the options identified by the Forum, and include considerable thought on transition to any new allocation and transfer system.

Water use efficiency should be encouraged using a range of tools.

30. There was general agreement that there is a need to set quantity limits to protect instream values - the importance of ecological and minimum flows for the habitat of both native and introduced fish species, and for recreational users, was recognised.
31. There was also a general view that the current 1st in 1st served system no longer worked for a growing number of catchments. The rest of the conversation on allocation was rather more fractured, possibly because of the absence of more fully developed options. It did however allow the expression of peoples' hopes and fears which will inform the more detailed analysis that will be needed. There was recognition that different allocation systems might be needed in different catchments to reflect the type of catchment, community and water supply issues, and widespread agreement with the notion that further work was needed on allocation and transfer options.
32. There was a general sense of anxiety about the use of economic instruments. This was most clearly felt by smaller rural water users. Some focussed on the possibility that particular interests (for example, dairy, electricity generators) might capture all available water to the detriment of other users (for example, food producers, small water users). Others questioned how a market system for water might work and what might happen to the rights of existing users, including those that had invested heavily in long-lived infrastructure and land that relied on access to water. There was a general concern that market outcomes might be inequitable or uncertain, and could worsen issues, but also that valuing water would not result in any increase in efficiency, that water already had a cost through consents, infrastructure and pumping, and that markets would drive profiteering and prospecting. Some wanted water scarcity addressed solely through supply measures – for example, more storage.
33. There were concerns over the environmental implications of a market for water - that trading might make the resource run out faster, that there was too much focus on abstraction and not enough on sustainability, that land use changes would not be able to be anticipated, and that without good quality controls water might move to more polluting land uses.
34. There was however some support for tendering and trading mechanisms. It was noted that pricing access to water would be a strong driver for more efficient use, and that it would enable the real value of water to be realised. Tendering and trading were not only an efficient way to allocate a scarce resource to its best use, but also to ensure flexibility of land use over time and prevent water hoarding. As long as quality and quantity limits were in place environmental concerns could be managed. Water was already priced into the cost of the land.

35. A few participants noted that the use of market mechanisms would have implications for iwi, while there was also a little discussion of whether the ownership of water needed to be addressed before more flexible water allocation and trading systems were introduced.
36. There were also comments on an administrative allocation mechanism. There was some support for 'political' allocation, but also strong opposition to 'council methodologies'. It was not clear to some how such a system would operate and how water use was to be prioritised.
37. There was support for more flexible transfer, as efficiency was being held back by the current restrictions. There was some support for community managed allocation and transfer, as well as for market transfer. There was however some concern expressed about profit being gained from the transfer of water that had been allocated without cost.
38. There were a range of comments on the importance of accurate measurement. There was a need to ensure metering and measurement, and a methodology for water measurement though some feared that metering was being duplicated and that metering requirements and monitoring were excessive.
39. Other points raised included:
- The impacts of climate change on the certainty of water available to be allocated
 - Whether resource rents that could be applied to a national cleanup fund were an alternative to tendering
 - The governance implications of different allocation options
 - Opposition to privatisation of water
 - Whether there should be perpetual water permits that could then be freely traded thereby constantly revealing the market value of the water
 - The importance of understanding catchments – surface and groundwater and the linkages between them
 - The relationship of allocation to property rights.

Water Use Efficiency

40. There were a large number of comments on the related issue of water use efficiency. The relationship between efficiency and reliability was noted. Some argued that greater reliability would drive behaviour change. Others made the link between reliability, trading and efficiency, and between efficiency and farmer and grower profitability. The desirability of getting both urban and rural users to use water efficiently was a strong theme. A range of mechanisms to promote greater water use efficiency were suggested.

Collaboration

Most people felt that collaborative mechanisms, while not without risks, provide a real opportunity for an alternative to government-driven and adversarial approaches.

41. In general, a collaborative approach to resolving a range of freshwater-related issues was seen as a positive step, but support was conditional. The Forum was congratulated for having successfully used a collaborative approach. It was noted that collaboration had already worked well in some areas and that it was a positive alternative to government-driven and adversarial approaches, but that it could be hard, time-consuming, and difficult to start. Collaboration could however reduce the costs of an adversarial approach, result in better and more accepted outcomes, and improve relationships between participants. There was among some participants disappointment in how collaboration had been managed by some regional councils.
42. Participants thought that incentives and a regulatory framework encouraging a collaborative approach were necessary; that resourcing was an issue, in particular for NGOs in comparison to corporate participants; that collaboration could potentially result in 'burn-out' or excessive demands on participants, and that an efficient process was needed to minimise these demands; that affected parties, including NGOs and farmers, should be involved; and that early education, passion, expertise, accessibility and relevance were necessary.
43. While most supported the concept of collaboration, there were a number of issues raised as to what collaboration was, how it was defined and how it worked, how to begin or transition to collaborative approaches, how to involve all relevant parties and the community, whether urgency or crisis was a positive or negative, how to move forward when no consensus was apparent, and how collaboration might operate in a politicised decision making system.
44. There was some concern as to how collaboration might 'fit' with the Resource Management Act, in particular with the requirements of Schedule 1 of the Act.

Water Storage

Water storage is a key to using water more efficiently. Most agreed that the use of collaborative approaches provided an opportunity to develop water storage proposals that are able to meet a variety of values.

45. There were a number of themes on storage and irrigation. Many felt the need to be able to use storage to offset the seasonal lumpiness and scarcity in the availability of water. Views on this theme included 'water is being lost to the sea yet there are restrictions on taking it' to the view that storage was one way of enhancing the efficient use of water, and that it would lead to high-use values of water. Some noted the difficulty in getting consents for rural infrastructure, even small-scale storage, and that compliance costs were killing the productive sector. There was concern that infrastructure was developed that was affordable and accessible to users.

46. The second theme was a clear concern that water storage and diversion did not disrupt important instream values. The development of dams and irrigation schemes affected water flows, flora and fauna, and recreational opportunities, but also resulted in land use changes and greater resulting water quality problems. Storage could not be divorced from the impacts that it had on the environment. The proposal in the report of withholding water as a compliance tool was generally supported.
47. There was recognition however that storage was a key contributor to water reliability, and that a number of positive economic and environmental benefits could be gained from greater reliability, including greater water use efficiency.
48. The third major theme concerned how to get storage schemes going. Discussions canvassed removing regional council obstacles, greater government funding (although this was also opposed), facilitation of community schemes, and more research into financing options and storage potential within minimum flows. More work was needed to identify where storage could occur, and the government needed to do more to facilitate and encourage new storage.
49. A final theme in some regions was hydro generation. Views varied – some noted the impact of hydro generation on instream values and tourism, others the considerable impact of hydro generation to the New Zealand economy.
50. There was also some discussion of the proposal that consent lengths be reviewed, with views split on the desirability of this.

Governance

Local decision-making is by and large supported but most felt that regional councils' patchy performance needs to improve and there is a need to resolve issues of capacity, accountability, lack of iwi input, and a lack of consistency between councils.

There was a divergence of views on whether the government should be able to appoint people to councils or council committees.

There was support for a national strategic approach to water management, but mixed feelings about the proposed Land and Water Commission.

51. Many participants felt that regional councils had not performed well to protect water quality and quantity in the 20 years since the Resource Management Act was passed. There were a variety of views of why this was - lack of national direction and guidance, for some councils a lack of resource, poor decisions by vested interests on councils, a lack of capacity and capability, a lack of the right tools, fragmented responsibility for water quality, and poor relations and understanding between regional and district councils, particularly over land use.

52. There was general although not unanimous support for the retention of regional councils, including because they provided a link to local communities. Solutions were however needed to resolve issues of capacity, accountability, lack of iwi input, an inability for communities to influence councils, and a lack of consistency between council practices.
53. Although not discussed at length, there was general support for a national strategic approach to water management. Within this context, there was support for the proposed Land and Water Commission, and some noted that it was needed to help reduce the sector working in silos. There was concern however that it would be just another bureaucracy when what was lacking was clarity of structure and the right tools. Others thought that political appointments would be made to the Commission. There was a suggestion that a multi-body stakeholder group that retained its independence (such as the Forum) would be just as effective. Some considered that without a statutory base it would be toothless, and suggested it should develop NPSs and NESs.
54. The co-governance proposal caused little discussion, although people were open to doing things differently. There were a few comments both in favour and against. There was limited comment on iwi being represented on councils or council committees, but most comments were supportive.
55. There was some discussion of whether a greater specialisation was needed for dealing with water issues – a ‘Water Act’ and ‘Ministry of Water’ were raised. Others noted that the problem was a lack of integration between land and water, and between water policy and other resources and policies, and isolating the treatment of water was not desirable.
56. There was a divergence of views on whether the government should be able to appoint people to councils or council committees. Opponents did not want to see a national takeover of local institutions, while proponents liked the ability to add specific expertise. There was strong opposition to these appointments being political in nature.

Science

There needs to be better coordination of freshwater science, and improved access by parties to science.

57. There was general support for the report’s science recommendations. Many participants noted that more money was needed for water-related science, and better national coordination of water science. Participants were clear that there must be science-based decisions. The importance of consistent quality monitoring was stressed. Science needed to be understandable and relevant.
58. There were a number of comments about councils ignoring sources of traditional or local knowledge (for example, mātauranga Māori) and relying too much on science that had

knowledge and information gaps. It was also noted that science will always have information gaps, and that a precautionary approach and adaptive management were therefore needed.

59. Another strong theme was that better access was needed for the science that was available. Science needed to be more widely available, especially if collaborative processes were used.

Funding

There was general support for the notion of a clean-up fund, but information on details was desired.

60. A few participants commented on a clean-up fund to address local issues and water quality problems. While in support, there were queries about where the money would come from, how the priorities would be determined, and what role local government would have in the fund. A few suggested that funding could come from resource rentals, the proceeds of tenders for water permits, or from the proceeds of 'polluter pays'.
61. Some participants noted that the fund should be broad in focus – it could be used to assist with riparian planting, or to allow community engagement in integrated catchment management.

Water Services Management

The further work on water services management proposed by the Forum is by and large supported, although district councils do not support all of the Forum's report. There was support by many people for urban volumetric metering and charging, although the saleability of the policy was questioned.

62. Many commented on various aspects of water services management. Most agreed that there were significant issues that warranted further investigation. These included:
- water quality matters such as the impact of stormwater, and the role of wastewater. There was some concern that urban dwellers did not recognise that there was a water quality problem.
 - Drinking water quality (including public health issues).
 - the number of local government units dealing with water services infrastructure, and with clear views that small communities had difficulty paying for the necessary infrastructure, and concerns over the performance and capacity of some district councils (this was not shared by the councils themselves).
 - the desirability of metering and charging – many supported urban volumetric metering and charging, but some questioned if the policy would be saleable.
 - Most saw the need for more efficient water use in urban areas. Some advocated the encouragement of schemes to allow rainwater and greywater to be used for non-

drinking purposes, and there were several who questioned why costly potable water was needed for non-drinking purposes.

63. The further work on water services management proposed by the Forum was widely supported, though a number of district councils were concerned at some of the assumptions that underlay the Forum's conclusions.

64. A group of territorial local authorities and associated engineers in a separate meeting with the Chair of the Forum stressed that changes in the way urban water infrastructure was managed needed to be arrived at after robust analysis of a range of options, and that local communities standing in decision-making needed to be respected. They believed that a further process was required, informed by research, and involving a wider range of participants than had been involved in the Forum.

65. The large majority of participants who addressed this issue agreed that a collaborative process to work through the different issues was desirable.

RMA Changes

While in general there are no major concerns over the Resource Management Act, there was some concern that elements of the Resource Management Act might be a barrier to implementation of the Forum's recommendations.

66. A number of participants suggested that changes needed to be considered to the Resource Management Act in order for water reforms to work. These changes included:

- Some industries were treated differently from others (for example through permitted activity status) without this being based on effects.
- There is a need for a precautionary principle in the Act;
- The Act is not well set up for the use of adaptive management;
- The use of moratoria might be justified in certain circumstances.

Capacity

Capacity issues need to be resolved if implementation of the Forum's recommendations is to occur well.

67. A number of capacity issues relating to implementing the Forum's recommendations were addressed during the engagements – these included the capacity of individual councils, central government, science providers, and landowners. The capacity of groups to engage in collaborative processes was also commented on.

Regional balance

68. All of the above major issues were discussed in all of the engagements. All regions noted their differences, physically, socially and economically.

69. A limited number of regional themes emerged. The main ones were:

- allocation and transfer issues (including anxiety over the use of economic instruments), and storage, were discussed more in eastern parts of New Zealand where water scarcity was an issue.
- The attitude to and experience of collaboration varied. There were fewer questions and queries as to how it would work from areas that had successfully used collaborative approaches – Tasman and Canterbury are examples.
- Concern over water quality deterioration was a common theme. In each region local examples were given of particular waterbodies and declining water quality, with possible causes reflecting the regional differences in catchment type and land use.

Land and Water Forum Secretariat

Appendix – Set of Matters that Participants believed the report should have covered, or covered more fully

- Biodiversity was covered inadequately
- Water biosecurity issues and pest management (for example, the threat of didymo)
- There should be greater emphasis on public health and water quality
- Water quality issues, and the link with land management, in coastal and estuarine areas.
- Soil quality and erosion issues, and the lack of soil scientists.
- The impact of climate change on water availability
- Greater emphasis on integrated catchment management.
- The opportunities provided by ecosystem services
- A business analysis and impacts assessment
- Allocation priority, including the primacy of clean and sufficient drinking water, and water for food production.
- Urban infrastructure and design
- Non-reticulated domestic users
- Discussion of externalities, including the use of palm kernel in feed
- The interaction of surface and ground water
- The linkage of the report to government reforms – for example, the Resource Management Act II changes, and infrastructure policy
- Overseas experiences and systems
- Wetlands are only briefly mentioned
- Ecological infrastructure
- A systematic view of the linkages between different water users and the way that water flows between them
- How to value ecological uses of water
- More emphasis was needed on the importance of energy in water policy
- There should have been a greater emphasis on climate change.
- The difficulties and complexities associated with obtaining water permits.