Tēnā koutou katoa,

Te Maru o Kaituna River Authority submission on the ‘Actions for healthy waterways’ proposal

We appreciate the opportunity to provide our input into the government’s ‘Action for healthy waterways’ package of proposals released on 5 September 2019.

TE MARU O KAITUNA RIVER AUTHORITY

Te Maru o Kaituna River Authority (TMoK) is the co-governance partnership enabled and established by the Tapuika Claims Settlement Act 2014. We are made up of iwi representatives from Tapuika Iwi Authority Trust, Te Kapu Ō Waitaha, Te Pumautanga o Te Arawa Trust, Te Tāhuhu o Tawakeheimoa Trust and Te Komiti Nui o Ngāti Whakaue, and council representatives from the Bay of Plenty Regional Council, Rotorua Lakes Council, Western Bay of Plenty District Council and Tauranga City Council.

Our purpose is the restoration, protection and enhancement of the Kaituna River and its tributaries which are considered taonga by both iwi and the wider Kaituna catchment community. Our Kaituna co-governance rohe or area starts at Te Waipuna – the headwaters of the Kaituna at Ōkere, running down the awa to Te Kōngutu Awa – the river mouth at Te Tumu Cut and Te Awa o Ngātotoroirangi / Maketu Estuary which is a particularly sensitive receiving environment. It is clear to all that our estuary is in poor ecological health, which affects mahinga kai, cultural and recreational values. We are under no illusion that substantial change is needed. Our focus is collective commitment and effort to turn this around within our part of the catchment, acknowledging Rotorua Te Arawa Lakes Strategy Group is working equally hard to improve water quality within Lake Rotorua and Lake Rototiti catchments (the upper Kaituna catchment).

Kaituna, he taonga tuku iho – a treasure handed down

As the Ministry is aware, we have in place our river document – Kaituna he taonga tuku iho – a treasure handed down which came into effect on 1 August 2018. It contains our vision, objectives and desired outcomes to restore, protect and enhance the Kaituna River and its tributaries. At our last hui we approved Te Tini a Tuna – the Kaituna Action Plan which is about collective action to ‘give life’ to the Kaituna River Document over the next 10 years.

Our vision:
SUBMISSION

We wish to express our general support for the ‘Action for healthy waterways’ proposed objectives to stop degradation of freshwater resources and reverse past damage in order to return freshwater resources and ecosystems to a healthy state. We share government’s sense of urgency for action where degradation is occurring in our waterways and the effect this is having on the health of our sensitive estuary. We do, hold some reservations, particularly around speeding up the process.

Key parts of the proposal we support as being particularly well aligned with our river document and it’s action plan are:

- Strengthening the concept of Te Mana o te Wai as an integrated concept and framework, as well as the hierarchy of obligation.
- Greater focus on a broader and more holistic view of ecosystem health which aligns more closely with TMoK’s purpose and functions, particularly with respect to:
  - Strengthened protection of wetlands and streams;
  - Strengthened protection of threatened indigenous freshwater species to ensure indigenous species thrive;
  - Stronger monitoring and reporting, inclusive of mātauranga;
- Strengthening expectations that Māori values must be accommodated meaningfully into freshwater planning, including elevating mahi kai to a compulsory value within the framework and stronger provisions for mātauranga Māori.

We do, however, hold a number of key concerns about the proposed package and it’s urgency for action, which include:

- While we generally support the new streamlined planning process to give full effect to the NPSFM by December 2025, we are concerned that shorter time frames may compromise iwi and hapū involvement processes and also compress community engagement. Relationship building, process agreements, and delivery take time.
- Ensuring appropriate resourcing as part of the government’s package to ensure active and meaningful involvement of tangata whenua is critical for successful implementation, particularly within the tighter timeframes proposed. There is in our view an opportunity for co-governance groups, such as ourselves and iwi to consider how they would like to be involved and display leadership in the freshwater space within the truncated timeframes.
- Māori rights and interests in freshwater are not addressed in the proposal. National direction and expectations as to how regional councils should progress treaty partnership obligations would be appropriate and helpful, along with appropriate resourcing solutions. We strongly suggest that government clearly sets out the process and timeframe for addressing Māori rights and interests in freshwater. Without addressing rights and interests, our concern is that some tangata whenua may not participate in or support the process.
- Nitrogen Impacted catchments: We would have expected part if not all of our catchment may have been included as a nitrogen impacted catchment due to the poor ecological health of our estuary, Te Awa o Ngātoroirangi / Maketu Estuary. The method for selecting nitrogen impacted catchments does not identify Bay of Plenty regions most impacted catchments, and the cap and reduction methodology does not target poor practice which is the stated purpose of the regulation. We seek an appropriate and implementable interim regulation.
- The proposed intensification regulation inappropriately captures conversion to irrigated horticulture. For the Kaituna catchment conversion from dairy to irrigated kiwifruit and avocado would generally be expected to improve environmental and economic outcomes under good management practice.
• Delayed national direction on allocation – both nutrient and water allocation approaches and lack of detail about proposals for three waters integrated management and their relationship with the NPSFM and NESF may impact on development of a coherent integrated framework.

We trust you find our submission constructive.

Ko tana wai
He horomata
He mārama
He puata
He oranga
Mō te tangata

Its waters are pure, clear, transparent, and promote the wellbeing of humanity. These are worthy goals to guide our futures endeavours.

Te Maru o Kaituna is available to be heard on this submission if the Minister for the Environment’s Independent Advisory Panel requires any further clarification. For matters relating to this submission, please contact me on Personal details removed

Nāku noa iti nei

Personal details removed