This submission is from the Tauranga Branch of the Royal Forest and Bird Protection Society (Inc)

The Tauranga Branch of Forest and Bird has over 400 individual members. We make the following comments in regard to the Tauranga Reserves Management Plan review.

1. Our members have commented on instances where they have seen of farmers, forest companies and local authorities which have, many years ago including the 1980’s, implemented riparian retirement, stock exclusion and interception of and treatment of storm water flows, made. Our members therefore have reduced sympathy for whinging authorities and land managers who, 30 years on, have still not implemented these basic practises to protect water quality.

We generally support the introduction of the proposed policies and rules.

2. Exception of support for S30(1)(e):

We request a greater riparian exclusion margin for stock being grazed intensively in winter. A 5m minimum margin in this situation is not enough to intercept and protect waterbodies from intensely polluted storm run-off. We request a 20m minimum in the rule.

3. We support the use of FWFP’s as an implementation tool. FWFP’s should be set as the next level of implementation under the requirements from rules that are set in a timeframe for achievement.

The task of improving water quality is immense and could appear over-whelming to a land manager. Gains can only be made incrementally. FWFP’s give land managers the necessary discretion on which aspects to tackle first to meet the time-frame set by rules.

We see S 38(2) (d) as the core tool to implementing change. In particular, we note the reference to overland flows. We request the adoption of standard RMA terms where possible. In our view, the consequences from storms are most intense from ‘ephemeral watercourses’ that form on farms, plantation forests land and in towns.

Where these occur, this is the source of most of our problems with phosphorus and silt contamination of streams and a significant source of nitrogen contamination.

The concentration of pollutants at these sites is more intense than the local overland flows across the majority of a streams margin. We would like to see the legislation specifically include in addition to ‘overland flows’ a reference to “ephemeral watercourses”. This inclusion would focus the attention of FWFP certifiers and auditors on targeting management of the dominant effect of ephemeral flows on permanent waterbodies.

4. S 40 and S41 FWFP certifiers and auditors.

We support the proposed provisions, but query whether there should also be provision for cancelling certification in these sections?

5. Our Society fully supports the intention of this proposal and commends the Minister’s drive to remedy the disgraceful degradation of our water bodies. ENDS.

Personal details removed