SUBMISSION ON PROPOSED HEALTHY WATERWAYS PROPOSALS FOR NATIONAL POLICY STATEMENT AND NATIONAL ENVIRONMENTAL STANDARD FOR FRESHWATER MANAGEMENT

TO: Ministry for the Environment
Environment House
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BY EMAIL: consultation.freshwater@mfe.govt.nz

NAME OF SUBMITTER: Ōtorohanga District Development Board Inc (ODDB)

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About the submitter:
Ōtorohanga District Development Board (herein as ODDB) is an incorporated society. Its membership and board represent the diversity of the district from a cultural and business perspective, with retail tourism, agriculture and service industries. It receives funding from the Ōtorohanga District Council to promote the development of the district by building on the identity of the district by:

- Promoting and supporting activity or services that will stimulate the economy of the Ōtorohanga District.
- Marketing the district as a great place to live, invest, do business or visit.
- Operating the Ōtorohanga i-SITE and Kawhia Information Centre
- Helping facilitate projects for the benefit of the district.

We are not a trade competitor for the purpose of this submission.

About our district:
The Ōtorohanga district extends from the Kawhia Harbour to the west and the Pureora Forest Park to the east. The township of Ōtorohanga acts as the main service town for the region, which is dominated by dairy (4th largest employer by district council in NZ) and the sheep and beef sector in the further reaches both east and west. Tourism is growing in significance, given that Ōtorohanga serves as the gateway to the Waitomo Caves as well as having its own internationally recognised Ōtorohanga Kiwi House. The Waipa River has major cultural significance for Ngati Maniapoto, while also acting as a lifeblood for those that depend on it and its tributaries to support activity in the region.
Introduction:

Given our landscape, the dominance of the primary sector and our reliance on it, any changes to rules that affect activity within our region will have major impact on all our communities. That said, it is the view of the ODBD that we must have sustainability at the heart of everything we do to ensure our community thrives for future generations. Sustainability to us is the use of the triple bottom line approach of healthy ecosystems providing for healthy people providing for healthy business.

ODDB supports the objectives of the freshwater management proposals in stopping further degradation, reversing past damage and addressing water allocation issues. We support the intent of the proposed changes to the National Policy Statement on Freshwater Management to give effect to the obligations of Te Mana o te Wai.

Our primary concerns, which we outline below relate to:

- Ensuring that decisions around rules and policies are science based and stand up to the scrutiny to allow measurable improvements and outcomes.
- Implementing rules and polices in such a way that communities and catchments can take ownership of their issues by applying changes unique to their situation. A nationwide blanket approach is not appropriate.
- Recognising work already done to improve water quality, especially around fencing of waterways and riparian planting, and giving further support to promote good management practice to build on what's been done to date.
- Giving enough time to transition, as the effect on communities such as the Ōtorohanga district will be immense from a social, cultural and economic perspective and ensuring that economic impact assessments form part of the consideration

Proposed bottom lines on Dissolved Inorganic Nitrogen (DIN) & Dissolved Reactive Phosphorous (DRP) national bottom lines.

From our reading and research, it is clear there is little science available to support the appropriateness of the values as the standard for national bottom lines. Science must guide decisions around policy development and support for our farmers and communities in developing solutions to meet the objectives we have signed up to. More work needs to be done to give credibility to setting national bottom lines. Given the objective of stopping further degradation by holding the line on any intensification until 2025, then it would make sense to use this time to build credible science to set national bottom lines. This will also allow Regional Councils to apply these in a local sense to plan changes within regions and catchments.

Nitrogen Loss:

There is a strong focus on managing Nitrogen loss within the proposal. We have concerns that this may end up being a distraction to the issues relevant to specific catchments in not addressing the issues impacting eco system health. Our community is a case in point with sediment and phosphorus being the primary drivers in the Waipa and Kawhia Harbours. It is therefore important that catchment values are established to ensure focus is appropriate for that catchment in targeting the issues relevant to that catchment. Communities have also proven over time that if you give us the tools then we can act. To that end support around Farm Environment Plans (FEP) is critical in giving farmers the tools to act.
Riparian Planting and Setbacks:

Driving around our district it is clearly obvious that some good work has and continues to be done around fencing of waterways. Dairy farmers have voluntarily signed up to this under the Water Accord. The proposed 5m setback should not apply to any existing fencing of waterways. Whilst recognising the importance of setbacks as a filter for contaminants, the effectiveness of these will be determined by the flow of water across the land. Riparian setbacks are most effective with sheet flow, whereas if water flow is channelled, typically through contour, then the setback is ineffective. A sensible approach to fencing and riparian planting guided by a robust FEP aligned to good management practice should be the approach used. A blanket approach over our district will have major ramifications for productive land use, placing unnecessary cost and in some cases not delivering to the specific issues of the catchments that need to be addressed.

Socio – economic impact to community:

Our district is dependent on our farming community. The current crisis of confidence in the rural sector is having a negative effect on economic wellbeing of our town of Ōtorohanga with many business owners commenting on lack of spend. This is counter intuitive to what we would expect, given that commodity prices for the primary sector are very favourable, which should bring optimism for our farmers and benefit for local businesses. Perception has already become reality for our farming community with the magnitude of change out in front of them. There is recognition that change needs to occur, but at what cost and over which time period? What will our rural communities look like over the coming twenty years given the magnitude of change?

There is general disappointment that no socio – economic analysis has been undertaken to understand the impact on rural communities. We would ask that this is a priority, not only to guide policy setting, but also as a tool to assist rural communities in understanding impact and how to transition their local economy to the realities of the new world they live in.

Summary:

Thank you for the opportunity to submit. Whilst not exhaustive we hope this gives some insight into community concerns from the Ōtorohanga district. At the heart of any community is its people. We ask that consideration is given to this as policy not only needs to protect its people, but to empower them to feel good about contributing to the economic, social and environmental wellbeing of their community.

Yours Sincerely

[PERSONAL DETAILS REMOVED]

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Chairman ODDB