have data for, there is a total of 130,020 metres to be fenced. At a minimum, being a post and two wire fence at $10/m, the total cost of fencing will be $1,300,207 across those 60 blocks. In terms of planting, there is a total of 142,395 metres to be planted; as there needs to be one plant every 2 metres, 71,198 plants to be planted. There is 2,500 plants to a hectare meaning that there is 28.5ha need planting. We have estimated a total cost of $1,063,050 across the 60 blocks for this level of planting. On the basis of our estimation, the total cost of planting and fencing is estimated to be $2,363,257 in Taranaki on these 60 blocks alone. It is important that this mahi (work) is acknowledged and, again, that Māori landowners are not penalised again in the context of this Reform despite the work undertaken to date.

42. Another example is a leased block administered by Te Tumu Paeroa on behalf of the Māori Trustee which is 80% covered in gorse. The last tenant was bankrupted in Aug 2019. There are 144 shareholding owners. This block is in 7 distinct parts as it is dissected by roads and streams. In partnership with Horizons, the current tenant and Te Tumu Paeroa the following works have been undertaken at an approximate cost of $58,900. The following issues and risks, in the context of the Reform, have been identified for this block:

a. Retrospective restriction on stock intensification. Grandparenting on 2017/18 stocking rates. The block had 7 horses on it previously. Today it’s cropping 4 ha and carries at least 20 cattle. We want to ensure we can still do this, but owners need to save for this development to increase the utilisation of the land. This won’t be possible under the proposed rules.

b. Cost for a separate farm plan and fresh water plan.

c. 4ha is now suitable for grazing in a sustainable manner. 12.5ha could still be developed from gorse, but this would increase intensification and fertiliser application beyond previous years ceasing the development impossible under proposed rules.

43. It is critical that, in further considering the Reforms, the Government is aware of these matters that will have a consequential effect on Māori land blocks.

**Insufficient capability and capacity**

44. Te Tumu Paeroa is also concerned about whether there is sufficient capability and capacity across local authorities, industry and landowners (including Māori landowners) to effectively deliver the proposals within the timeframes included in the Reform package.

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3 Which averages out to $40,000 per block.
4 Approximately made up of gorse crushed and sprayed on potential pastoral land ($12,000), 6.7ha fenced and retired into riparian wetland areas ($26,000), Dam construction with stock track crossing waterway ($3,500), Water reticulated system established; Tank, Pump and 8 troughs ($6,800), Planting of 320 natives 2019 ($1,600), Soil tests, Fertiliser, Winter crop and pasture development 3ha ($9,000).
45. At the very least, the Reform will require significant investment in monitoring, freshwater farm plans and compliance.

46. In short, it is not clear to Te Tumu Paeroa how some of the proposals in the Reform package will be implemented, monitored and enforced. Māori landowners and Te Tumu Paeroa will need support beyond funding to ensure it can meet these obligations otherwise the Reform runs the risk of setting people up to fail.

Catchment based approach is critical

47. Although Te Tumu Paeroa supports a level of National direction, it is critical that there is flexibility within the Reform proposals to be applied at a catchment level.

48. On our analysis, some proposals provide for this (including planning processes) and some proposals do not (some of the on-farm specific proposals).

Allocation

49. Te Tumu Paeroa endorse a sustainable approach to water allocation that enhances the productivity of this resource and ensures Māori Land and enterprises are not disadvantaged by virtue of ‘first in, first served’ water allocation policies.

50. Te Tumu Paeroa is disappointed that the Reform does not address allocation directly. Allocation to Māori landowners is an issue that is constantly and consistently raised but has not yet been addressed at a National level.

51. Te Tumu Paeroa wishes to be involved in any further conversations and policy development about water allocation to ensure the perspectives of Māori landowners, particularly those smaller underutilised blocks who have been historically locked out of the system, are heard and reflected in the policy development.
Specific submissions on Reform proposals

52. In this section, Te Tumu Paeroa responds specifically to parts of the Reform proposals that necessitates a view from the Māori Trustee based on our analysis.5

Draft NES

53. Te Tumu Paeroa supports the need for farms to have certified freshwater farm plans (FW-FP). Te Tumu Paeroa has started this work. However, Te Tumu Paeroa repeats its concern about capacity and capability to prepare these FW-FP including how they will be monitored and enforced.

54. Funding should be provided for Māori landowners to ensure that they can afford to comply with this obligation (if they have no other means of doing it).

55. Te Tumu Paeroa also has concerns about the unintended consequences of the proposals contained in clauses 29, 30, 35, 36 and 42-48. On our analysis, these will have implications for our land blocks in terms of not being able to fairly intensify (from what is usually a low base in any event). They limit flexibility of leased land in particular, as its future use will be limited to its previous uses. This in turn will restrict leasing opportunities, rental incomes and returns and therefore general upkeep of the land.

56. As noted previously, the Government needs to complete further analysis on how this Reform will affect those smaller Māori land blocks. Te Tumu Paeroa recognises the need to manage land use differently however this cannot be at the expense of Māori landowners who have not been able to utilise their land historically. There needs to be a careful balancing and, if the Reform proceeds as it is currently framed, then funding needs to be provided to Māori landowners to offset these compliance costs.

Exclusion of stock from waterways - Draft stock exclusion section 360 regs

57. The draft stock exclusion regulations, as currently drafted, will have an immediate and detrimental impact on TTP and its landowners.

5 Te Tumu Paeroa has not submitted on those parts of the Reform that do not have a direct impact on Te Tumu Paeroa or the Māori landowners it works on behalf of.
58. A number of our existing blocks have already put in place stock exclusion fencing and planting of riparian areas. They will now have to shift fences within the next 5 years if they do not fit the 5 metre average rule. This is counterproductive as it will re-direct funds that could have been spent on the betterment of other environmental issues to re-visit an issue that has already been addressed. Consequently, there appears to be little scientific background to the 5 metre distance set.

59. Te Tumu Paeroa has a number of medium hill country blocks which will require some form of waterway fencing under the proposed rules if they are to run cattle. This will require large capital requirements and heavy machinery. If the trust is unable to afford such development, land uses will be restricted.

Draft NPS-FM

60. Te Tumu Paeroa supports the increased hierarchy, and stronger legal weighting, afforded to Te Mana o te Wai as proposed in the revised NPS-FM.

61. Te Tumu Paeroa notes that to enable Te Mana o te Wai to be the korowai for freshwater management, this Reform must provide clear objectives and a policy suite to ensure its success.

62. Te Tumu Paeroa does not support qualifiers such as local authorities being required to “take reasonable steps” to involve iwi/hapu in freshwater management. Iwi, hapu and Māori landowners (noting the whakapapa overlaps) must be involved in these discussions and decisions.

63. Te Tumu Paeroa notes further that some Māori landowners may not have the capacity or capability to engage at the level required in these freshwater planning processes. Further thought needs to be given to ensure that adequate funding is provided for training and on-going support.
Conclusion

1. Te Tumu Paeroa looks forward to discussing this submission with the Panel appointed by the Minister to consider submissions on the Reform.

2. Please contact Teree Brown to arrange a time for the Māori Trustee to speak to this submission.

Dr [Personal details removed] Māori Trustee

[Personal details removed] Executive Assistant to the Māori Trustee

P: [Personal details removed]
APPENDIX A

HIMATANGI 3A3G2 RESTORATION MAHI

Before

After
APPENDIX B

TUKITUKI

Before

![Before Image]

After

![After Image]
APPENDIX C

POND PLANTING AT SNEE ROAD, NORSEWOOD

Before

During

After
APPENDIX D

MANUKA WETLAND IN OTAKI BEACH
APPENDIX E

HEREHERETAU STATION FENCING AND PLANTING