28 October 2019

To: Ministry for the Environment
PO Box 10362
WELLINGTON 6143

Email: consultation.freshwater@mfe.govt.nz

Subject: RUAPEHU DISTRICT COUNCIL’S SUBMISSION ON THE NATIONAL DIRECTION FOR OUR ESSENTIAL FRESHWATER

Submission from: Ruapehu District Council
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Council does not wish to speak in support of its submission.

1 INTRODUCTION

1.1 Ruapehu District Council (RDC) would like to thank the New Zealand Productivity Commission for the opportunity to submit on the draft report regarding Local Government Funding and Financing. Investigating and responding to pressure points and ways that Councils cost pressures can be managed is critical in delivering for our communities.
1.2 **Background of Ruapehu District**

The Ruapehu District is one of New Zealand’s largest districts by land area, of which, 36% is Crown owned. It has a small population of approximately 13,000 scattered throughout a wide geographical area of 6,730 square kilometres, of which 40% of residents identify as Māori. Per capita, the Ruapehu District has one of the highest visitor numbers in Aotearoa. The area is predominantly rural and includes the Tongariro and Whanganui National Parks, a large portion of the Whanganui River and many tributaries cementing the District’s rich natural environment and history as pivotal in Aotearoa’s identity.

2 **DISCUSSION**

2.1 Council supports the LGNZ “Regional Sector Commentary on Essential Freshwater Proposals” September 2019.

2.2 Council supports an evidence-led approach to freshwater policy which is underpinned by sound science. The actions of the healthy water ways proposal appears haste in its delivery over five years. To ensure meaningful, cost effective and enduring changes, with community buy-in and support at a local level, adequate time needs to be allowed for.

2.3 The document has not set up the individual catchments and validated what each individual catchments science indicates as the best way to improve or prevent degradation occurring further.

2.4 The consequences of mass land use change need to be thoroughly considered. The National Programme of Land Use has identified forestry as a low nutrient option. Encouraging mass land use changes to forestry has seen many major effects, specifically affecting the four wellbeing’s as seen in the Wairoa District.

2.5 Mass land use conversions to forestry also has major economic effects on rural communities, with forestry replacing traditional farming land, shrinking the agricultural sector that many New Zealand communities depend on.

2.6 Another recent example of this are the detrimental effects of forestry land use across the Bay of Plenty. Forestry slash and debris have ended up on beaches and in rivers, causing significant environmental harm, which is still occurring today.

3 **RECOMMENDATIONS**

3.1 We recommend following the recommendations and guidelines outlined in the LGNZ “Regional Sector Commentary on Essential Freshwater Proposals” September 2019.

3.2 Consider extending the five year delivery programme.

3.3 Identify and establish the individual catchments and validate the individual data for better improvement and prevention of degradation.

3.4 Consider the effects of encouraging mass land use conversions to forestry other than solely focusing on nutrient levels. Considerations need to be made to the wider environmental impacts of, as well as the economic wellbeing of many communities.