Kia mau ki te whenua hei oranga mō te iwi”

To protect, manage and enhance the Rotomā No. 1 Incorporation land and assets to the best advantage of the shareholders and their descendants

He kāwai whakapapa nō mātou ki a Rakeimarumaru. Nā Uruika tuatahi ko Tarawhata, nānā ko Uruika tuarua, ko Pikirarunga, ko Tahuniua, ko Rakeimarumaru, ko Hinetamairu. Ka moe a Hinetamairu i a Tamateatutahi, ā, he uri mātou nā rāua e karanga atu ana ki ngā hau o Tāwhiri.

SUBMISSION
ACTION FOR HEALTHY WATERWAYS

31 OCTOBER 2019
1. Introduction

1.1 Rotomā No. 1 Incorporation (Rotomā) was established in 1908 by the Māori Land Court to administer the 6,637 acres on the shore of Lake Rotomā known as the Rotomā No. 1 Block. An initial register of 207 owners has now grown to include over 1,800 of their descendants.

1.2 We affiliate to Ngāti Tamateatutahi-Ngāti Kawiti a hapū of Ngāti Pikiao. The primary area of interest for Ngāti Pikiao is located between the coastal areas of Maketu to the west onward to Otamarākau to the east and inland to the areas around Lakes Rotoiti, Rotoehu, Rotomā and Okataina.

1.3 A key land-owner (Mana Whenua) with residential leasehold properties along the shores of Lake Rotomā, the CoM has supported the current development of the sewage pipeline to prevent further degradation of Lake Rotomā. As such, the Rotomā No.1 Incorporation seeks to maintain a robust and open conversation with policy makers and stewards to ensure all waterways remain protected and the mauri and oranga of these waterways are maintained.

1.4 The operations of Rotomā have been largely dedicated to the forestry industry initially by way of leasing the native forest cutting rights. By 1995 much of the forestland was replanted with pinus radiata. Rotomā has just completed the harvesting of the forestry estate and has decided to replant a majority of the estate back into pine. Approximately 50 ha of the estate will revert to native.

1.5 From the late 1950s the Committee of Management (CoM) took advantage of an opportunity to subdivide and lease lakefront residential sections along the Rotomā lake edge. Several development phases to create more sections took place over the next few decades and there are currently 147 leases that continue to generate a reliable and steady income stream for Rotomā today. Rotomā also has commercial rental investments in the Rotorua Township.

1.6 Rotomā is also fortunate to have geothermal fields beneath its lands and, since the early 1990s, have been looking at innovative ways to utilise this resource to provide a prosperous future for Rotomā and its shareholders.
1.7 Our values system, which can be seen in most aspects of everyday life, has evolved over hundreds of years. And although core values are frequently being challenged in the modern world, it is important to acknowledge their relevance. In fact, modern day challenges often act as a catalyst that reinforces cultural views instead of a mechanism of obsolescence. As mana whenua it is important that Rotomā are seen as an important partner for any future discussions regarding our waterways and are not subsumed into larger groups such as post Treaty settlement entities by local governments, In this context this submission places emphasis on the use of Cultural Value Based Frameworks that align to our values and mission statement;

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1.8 Rotomā recognizes Mana o te Wai as a relevant and compatible framework.

1.9 Additionally, in order for our values not to be generalised, we believe it’s important that these cultural frameworks and measures of well-being are identified and developed by the affected mana moana-manawha, mana whenua and/or hapū and iwi.

1.10 Lastly, meaningful engagement with and participation by affected Māori should not be undermined in any way. Where mana moana-manawha wishes to contribute in environmental matters – planning, implementation and management - there should be a mechanism enabling those groups to do so. This would include being fully resourced by local government to ensure that relevant cultural beliefs are genuinely and effectively met.

2. Overview – the health of our nation depends on the health of our freshwater (Section 1)

2.1 Proposal 1: RMA amendment bill:

2.1.1 Introduce a new freshwater planning process that will require councils to have new plans in place no later than 2025.

2.1.2 We support part of the approach submitted, however our recommendations are set out below:
a) Mana-moana-mana whenua and/or hapū and iwi are embedded in the process - particularly as decision makers when councils are developing and implementing freshwater management plans;

b) Ensure that the ability for local Māori values to be included in freshwater management. These values may differ between each Māori group;

c) Mana moana-mana whenua, (and/or hapū and iwi - depending on the situation) are resourced by local government to participate effectively in all freshwater planning processes; and

d) Participation should be inclusive and not default to post Treaty settlement entities without consent from mana moana-mana whenua.

2.2 Proposal 2 - NPS FM

2.2.1 Strengthen and clarify the requirement to manage freshwater in a way that gives effect to Te Mana o te Wai; this refers to the integrated and holistic health and wellbeing of waters as a continuum from the mountains to the sea.

2.2.2 We support part of the approach submitted, however our recommendations are set out below:

a) It should be mandatory that Te Mana o te Wai be the underlying principle of any freshwater management plans.

2.3 Proposal 3 – NPS-FM:

2.3.1 Restructure and redraft the NPS-FM to improve clarity and reinforce a holistic approach to freshwater management

2.3.2 We support part of the approach submitted, however our recommendations are set out below:
a) As per above it should be mandatory that Te Mana o te Wai is the underlying principle for freshwater management planning. This will inevitably provide for a holistic approach and allow for local Māori values to be an essential element of managing freshwater.

2.4 Proposal 4 – NPS-FM:

2.4.1 Strengthen the requirement to identify and reflect Māori values in freshwater planning, with two options set out in this document for feedback.

2.4.2 We support part of the approach submitted, however our recommendations are set out below:

a) As per above it should be mandatory that Te Mana o Te Wai is the underlying principle for freshwater management planning. This will inevitably provide for local Māori values to be an essential element freshwater management.

2.5 Proposal 5 – NPS-FM

2.5.1 Support renewable energy targets by exempting major hydro-electric schemes from some freshwater management requirements

2.5.2 We do not support this approach for the following reasons:

a) This proposal undermines the Essential Freshwater objective to stop further degradation and loss; and

b) Major hydro schemes need to contribute appropriately to address their contribution to freshwater decline.
3 Raise the bar on ecosystem health (section 5)

3.1 Proposal 1 – NPS-FM

3.1.1 Broaden the focus of national direction and planning to a more holistic view of ecosystem health and require better monitoring and reporting.

3.1.2 We support part of the approach submitted, however our recommendations are set out below:

a) As per sub para 2.2, 2.3 and 2.4 above, if Te Mana o te Wai is the underlying principle of ecosystem health, the holistic approach to monitoring and reporting will be expected.

b) That any monitoring includes a Matauranga Māori based matrix to be developed by affected mana moana-mana whenua, hapū and/or iwi. This should sit alongside any science-based data and not be viewed as an option or supporting document. This aligns with Te Mana o te Wai comments regarding Mandatory Māori measures of wellbeing in the NPS-FM;

c) That a Matauranga Māori based matrix be used to develop cultural water quality and other environmental indicators and to be included in national water quality and other environmental standards;

d) Mana moana-mana whenua - and/or hapū and iwi depending on the situation - are resourced by local government to participate effectively in all environmental planning processes. Do not default to post Treaty settlement entities without consent from mana moana-mana whenua; and

e) Affected mana moana-mana whenua, and/or hapū and iwi are resourced by local government to develop Matauranga Māori based indicators. Do not default to post Treaty settlement entities without consent from mana moana-mana whenua.
3.2 Proposal 2 – NPS-FM

3.2.1 New attributes (indicators of ecosystem health) to be monitored and maintained or improved

3.2.2 We support part of the approach submitted, however our recommendations are set out below:

   a) That any new attributes to be monitored and maintained or improved with regards to local ecosystem health to include Mātauranga Māori based indicators that are developed by affected mana moana-mana whenua and/or hapū and iwi. This aligns with Te Mana o te Wai comments regarding Mandatory Māori measures of wellbeing in the NPS-FM; and

   b) Affected mana moana-mana whenua, and/or hapū and iwi are resourced by local government to develop Mātauranga Māori based indicators. Do not default to post Treaty settlement entities without consent from mana moana-mana whenua.

3.3 Proposal 3 – NPS-FM

3.3.1 Higher standard for swimming in summer

3.3.2 We support part of the approach submitted, however our recommendations are set out below:

   a) Higher swimming standards should be all year round and not just during the summer season. Reducing contamination in general – not just in the summer – should be a key objective of freshwater management and it should also align with wastewater management. Lake Rotomā is also a water source for the local community so the water quality needs to maintain a high standard all year round; and

   b) Must also include a higher standard in water quality for traditional food gathering. For Māori food gathering is not a seasonal event – it occurs all year round.
3.4 **Proposal 4 – NPS-FM & Freshwater NES**

3.4.1 **Protect urban and rural wetlands and streams**

3.4.2 We fully support this approach.

3.5 **Proposal 5 – NPS-FM**

3.5.1 **Protect threatened indigenous freshwater species**

3.5.2 We support part of the approach submitted however, our recommendations are set out below:

   a) Cultural values-based matrix developed by affected whānau and/or hapū and iwi to be included in the development of policies determining how threatened indigenous freshwater species will be protected; and

   b) Mana moana-mana whenua, and/or hapū and iwi are resourced by local government to participate effectively in this process. Do not default to post Treaty settlement entities without first engaging with mana moana-mana whenua.

3.6 **Proposal 6 – NPS-FM & Freshwater NES**

3.6.1 **Provide for fish passage**

3.6.2 We support part of the approach submitted however, our recommendations are set out below:

   a) As long as man-made structures are not built (that interfere with the natural water flow and the surrounding eco-system) to allow this to occur. We have experienced an issue with man-made structures on Lake Rotoiti providing for high lake levels consequently causing considerable cultural, social and economic impacts on tāngata whenua.
3.7 Proposal 7 – NPS-FM and Regulations

3.7.1 Improvements to setting minimum water flows and reporting on water use.

3.7.2 As mentioned previously it is extremely difficult for Rotomā No. 1 to provide recommendations regarding freshwater allocation when customary rights are yet to be resolved. However, we also acknowledge that it is also important that to “have a voice” we must participate in this process.

3.7.3 We support part of the approach submitted however, our recommendations are set out below:

a) All points as per Te Mana o Te Wai, Moratorium Declaration;

b) Affected mana moana-mana whenua, hapū and iwi play a significant role in setting objectives around better management of water allocation in their areas of interest; and

c) Mana moana-mana whenua, and/or hapū and iwi are resourced by local government to participate effectively in this process. Do not default to post Treaty settlement entities without first engaging with mana moana-mana whenua.

4 Support the delivery of safe drinking water (section 6)

4.1 Proposal 1 – Amended NES or Sources of Human Drinking Water

4.1.1 Strengthen requirements to assess and control risks to drinking water sources

4.1.2 Lake Rotomā is a significant asset to the local iwi and hapū. We are the major landowner located on the shores of Lake Rotomā. This lake is the primary source of water for the local community.

4.1.3 We support part of the approach submitted, however our recommendations are set out below:
a) Mana moana-mana whenua need to be actively involved in regional council decisions on how to regulate source water. The use of Māori measures of wellbeing, as mentioned in Te Mana o te Wai, to be included as a mechanism in assessing and controlling the risks to drinking water sources;

b) Given that most water sources used for drinking are located on Māori land the measures of wellbeing to be determined by mana moana-mana whenua and/or hapū and iwi; and

c) Mana moana-mana whenua, and/or hapū and iwi are resourced by local government to participate effectively in this process. Do not default to post Treaty settlement entities without first engaging with mana moana-mana whenua.

4.2 Proposal 2 – Proposed Wastewater NES and proposed Water Services Act.

4.2.1 Set minimum standards for wastewater discharges and overflows and require all operators to follow good practice risk management

4.2.2 We do not support this approach.

4.2.3 Setting minimum standards for wastewater discharges and overflows will not reduce the risk of contamination and minimise pollution of our rivers, lakes, groundwater and the sea from stormwater and wastewater. The wastewater industry needs an overhaul and genuine consideration for new developments in the treatment of wastewater is required.

4.2.4 The western way of life uses water as if it is an infinite resource and contaminates water without major concern for discharge to the environment.

4.2.5 Our Recommendations set out below:

a) We have a strong preference for on-property systems that achieve a high level of pre-treatment through processes
such as faecal to non-faecal conversion. Treatment systems must provide adequate and effective mechanisms that allow for the transformation of all faecal matter into non-faecal material (typically aerobic biological processes);

b) Greywater separation - The critical characteristic of greywater is that it is not contaminated with human waste. With adequate treatment greywater would provide a resource for reuse and irrigation;

c) Suitable wastewater treatment solutions that encourage minimising on-property water use and water contamination; and

d) Suitable wastewater treatment solutions that encourage minimising the contamination of water with human waste on-property and in reticulation networks.

4.2.6 Scientific analysis shows that as a comparative metric for wastewater treatment, Total Suspended Solids does not distinguish between faecal and non-faecal contaminants. Additionally, the basic wastewater treatment metrics (TSS, BOD, E.Coli, TN and P) do not consider hydrogen sulphide – a common source of wastewater-like odour. Therefore, we cannot solely rely on these metrics.

4.2.7 Our Recommendations set out below:

a) Current basic wastewater treatment metrics need to be improved and include other relevant characteristics of effluent quality. Contamination of water with human waste should be minimised (on-property and in the reticulation networks);

b) Key objectives relating to this statement include:

   I. Minimising the amount of human waste and concentration/toxicity of effluent reticulated to a WWTP;
• Ensuring on-property systems have processes to deliver a significant level of treatment;

• Consider the potential for improved systems especially in the future;

c) Minimise deterioration of effluent in piping network;

I. Local government should consider rejuvenation processes i.e. aeration, dosing and flushing;

d) Preventing leakage in the piping network;

I. Ensuring adequate resilience to failure; and

II. Ensuring there is adequate means and processes to detect potential leakage.

5 Improve ecosystem health by improving farm practices where needed (section 8)

5.1 Proposal 1 – Freshwater NES

5.1.1 Ensure all farmers and growers have a plan to manage risks to freshwater

5.1.2 We do not support this approach for the following reasons:

a) Rotomā No.1 supports the reduction of nitrogen or other substances that maybe exported into any waterways and are detrimental to the mauri of wai and acknowledges that owners of Māori land in the catchment must play their part in this important kaupapa;

b) In regard to intensive dairy and sheep and beef farming Rotomā No.1 does not support any further intensification to farming areas. If the objective is to reduce further degradation of its waters Rotomā No.1 does not understand how allowing restricted intensification will not reduce the risk of contamination and minimise pollution of our rivers, lakes & groundwaters; and

c) We support gathering more feedback from stakeholders
in how these plans will be implemented and monitored.

6 Conclusion

6.1 Rotomā No. 1 Incorporation is a major landowner around Lake Rotomā. Our people have lived in this region for over 500 years and we will be here for many more. Our lakes are a taonga, they are iconic landmarks of New Zealand and are significant features of our hapū landscape and identity. We are lakes people and we have a close affinity to Lake Rotomā and its associated waterways. Our hapū interests stem from our history, whakapapa, travels of our tupuna to the time our people settled along these shores up to the present day. These waterways were a significant resource for food, gathering, bathing, transport, customary practices and recreational activities.

6.2 Unfortunately for decades we have been dictated to through various policies on how our waters are managed and how we do things on our lands and for the most part we’ve had to endure activities that go against our values system. Sadly, and frustratingly, as a result we have witnessed the deterioration of our waterways not only in Ngāti Pikiao but in the wider Te Arawa region. Taking this perspective and considering our long-term occupation of Lakes, Rotoiti, Rotoehu and Rotomā we feel we deserve a strong say in freshwater management particularly within our rohe.

6.3 What is essential is our cultural values are embedded in any freshwater and other environmental planning, implementation and management processes. Equally it is vital that we are adequately resourced to effectively engage with decision makers to ensure our cultural values are not generalised, compromised, misinterpreted, undervalued or diluted.

Dated at Rotorua this 31st Day of October 2019

Personal details removed

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Chairman