31 October 2019

Hon David Parker
Minister for the Environment

Hon Nanaia Mahuta
Minister of Local Government

Hon Damien O'Connor
Minister of Agriculture

Parliament Buildings
Molesworth Street
Wellington 6011

By email: consultation.freshwater@mfe.govt.nz

Dear Minister

Proposed national direction or freshwater

Thank you for the opportunity to submit on the discussion document ‘Action for healthy waterways’ and the proposed National Environmental Standards for Freshwater.

The Rangitīkei District Council appreciates that protecting the environment a complex issue which affects everyone. We think that the time provided to respond to the discussion paper is far too short and implies the Government is not interested in meaningful dialogue with citizens. In addition, we consider that the time to implement the new requirements needs to be extended.

As a district whose economy is driven by agriculture, we are mindful that many of the proposals impact directly on the farming sector, and we hope that the Government gives careful attention to the concerns and potential solutions conveyed by the sector. The costs noted in section 10 of the discussion paper are substantial. If as a consequence of implementing this national direction and associated regulations, land is to cease being in productive use (for example through the five-metre setback or limitations on winter grazing), a transition package is essential. This is not just for those people losing their livelihoods; consideration is needed on how such land (with no value for the farmer) is to be managed in future and how the costs of doing this are to be met. We accept that there will
be a scientific basis to setting the buffer margins for waterways. However, we suggest that it is unreasonable to require those farmers who have already fenced off waterways with a smaller buffer to relocate such fences.

In principle, Council supports the proposals in section 6 (drinking water) for more consistent management of source waters such as rivers, lakes and groundwater, and including this is regulation. However, it is unclear whether this is to apply to rural, non-potable supplies, which are not treated. We consider that this exclusion should be made specific.

Council also supports the proposals in section 7 (stormwater and wastewater), in particular the preparation of risk management plans which consider environmental, public health, property and social/cultural risks and having nationally consistent measures. However, with the latter we suggest much stronger engagement with the sector than was done with the current set of mandatory measures for stormwater and wastewater.

I hope these comments are useful.

Yours sincerely

Mayor of the Rangitikei District