31 October 2019

Ministry for the Environment
Via Email: consultation.freshwater@mfe.govt.nz

Re: Action for healthy waterways: A discussion document on national direction for our essential freshwater

In general, Whanganui District Council (Council) supports the proposed reform objectives and the focus on improvements to water quality and ecosystem health. In particular, Council supports the work of the Te Mana o te Wai framework; enhancing requirements for reporting on and managing freshwater ecosystem health; and the use of national regulation to manage contaminant losses from high risk rural land use practices.

However, the following issues are identified for further consideration and amendment.

One size does not fit all

It is believed that a ‘one size fits all’ approach is impractical and inaccurate. There are a variety of issues and contexts that may influence ecosystem health and delivering improved outcomes across these differing scenarios will require a more flexible toolbox of actions. This should include making sure that these actions are relevant and responsive to the local environment as well as recognising that the ‘natural’ pre-development state of rivers have different characteristics based on the surrounding geology and benthic morphology. Council supports the points made in the LGNZ submission in relation to the wide variation in impact and importance when limiting nitrate-nitrogen levels.

Council does not support the setting of national standards for water quality in relation to DIN and DRP as this does not contribute to evidence-based policy. Council considers that a more appropriate way of setting water standards at a national level would be to develop principles which must be implemented by regional councils based on the ‘natural’ capacity of a waterway.

Intensification concerns

Council does not support the proposed frameworks, rules and standards as they relate to intensification. The grandfathering of current levels of discharge into our waterways and the locking-in of existing land uses effectively rewards high intensity and high discharge approaches, while limiting farming models that are based on low intensity, input and discharge. This will have a disproportionate impact on cropping as well as sheep and beef farming and is at odds with the encouragement for farmers to diversify.
It is requested that restrictions on land use change, and any grandfathering provisions in relation to the freshwater module and hill country cropping, be modified to provide greater flexibility and to recognise the impacts on our rural communities.

**Waterways setback**

Council supports the proposed setback from waterways, however, points out that there may be unintended consequences given the number of waterways that have already been fenced. Where the fencing of waterways has been carried out prior to the commencement of these regulations, fencing should not be required to comply with the average setback. Many farms have invested significantly in riparian fencing and Council considers that it would be an unreasonable imposition to require the relocation of these fences simply to comply with the nationally consistent average setback.

Council supports the LGNZ recommendation that any national regulation be drafted to preserve existing riparian fencing and only require relocation once the fence is due for replacement.

Yours sincerely,

Personal details removed

Mayor
Whanganui District

Chief Executive
Whanganui District Council