In the matter of:  

*Proposed Freshwater Package including:*

*Action for Healthy Waterways*

*Proposed National Policy Statement for Freshwater Management*

*Proposed National Environmental Standards for Freshwater*

*Draft Stock Exclusion Section 360 Regulations*

And:  

*Waikato Regional Irrigators Inc.*

Submitter

And:  

*Ministry for the Environment*

PO Box 10362

Wellington 6143

Contact:  

Personal details removed

Submission on Proposed Freshwater Package

1. This submission is on behalf of the Waikato Regional Irrigators Incorporated in relation to Ministry for the Environment proposed National Policy Statement for Freshwater Management and the proposed National Environmental Standards for Freshwater. Waikato Regional Irrigators Incorporated will gain no competitive advantage through the lodgement of this submission.

2. The Waikato Regional Irrigators Incorporated (WRII) comprises a large group of irrigators within the Waikato Region who are dedicated to ensuring that irrigation water is used responsibly, efficiently and effectively for the support of sustainable agriculture and horticulture within the region. The focus of this group is on encouraging the efficient use of water and sustainable farming/land use practices. A priority is maximising the efficient use of water for irrigation while recognizing other community needs.
3. We consider that well managed irrigation reduces nitrate leaching and enables farmers to participate in maintaining a healthy contribution to clean waterways and groundwater. Ensuring efficient use of water resources and a reduction in overirrigation can be a useful tool to reduce nutrient leaching.

A desktop study by Aqualinc Research\(^1\) found that changing irrigation practices to maximise efficient usage of water resources reduced nitrate leaching to water by 27% (~19kg N/ha/annum), on average.

4. WRII support strategies and actions towards achieving healthy waterways and work to protect clean drinking water for communities.

5. We consider that more analysis is required regarding the science behind water quality bottom lines and the social, cultural, economic and environmental impacts of the proposed package. We ask that a full analysis be undertaken, proposals be updated accordingly, and a second round of consultation be carried out.

6. WRII support utilising a catchment collective approach to improving water quality. Subcatchments have already been identified under regional plans and provide an opportunity for landowners to work collectively to manage water quality on a subcatchment scale, rather than an individual basis. This allows for a community to work together and share ownership of the land.

7. We consider that using existing industry Good Management Practices ensures effective erosion and sediment controls, nutrient management, crop rotations and irrigation practices. We envisage information sharing between GAP systems and regional councils, providing accountability.

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**Proposed National Policy Statement for Freshwater Management**

8. The WRII support the concept of Te Mana o Te Wai, “the mana of the water”, but consider that clarification is required surrounding the implementation of this concept across regional councils. We consider that a method of implementation should be provided to ensure consistency across councils.

9. We support the use of water quality accounting systems but consider that the development of such systems that can accurately model nutrient leaching be funded by the Government.

10. We support the ability for farming enterprises to collectively manage water resources under a sub-catchment approach. The collective use of water resources across FMUs is essential for vegetable production in this country. Sub-catchments allow the collective ownership of a water resource as opposed to individual farms. We consider that water quality targets would be developed by the catchment group and modelling would be required to predict the effectiveness of mitigation methods proposed. Targets and mitigations would be provided to and monitored by regional councils.

11. We consider it unreasonable to state that decisions be made upon ‘partial data, local knowledge and information obtained from other sources.’ We consider that these decisions affect

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livelihoods, communities, farm productivity and land values and must be supported by robust scientific data that is updated when required.

12. The WRII support allowing the transfer of water take permits for irrigation purposes. We consider that maximizing the efficient allocation of water resources is essential in order to prevent a lack of flexibility for irrigators to utilize their land.

13. The WRII are concerned that a lack of resourcing and capabilities may lead to a lack of capability of regional councils in implementing the proposed Freshwater package. Regional Councils are already overwhelmed and are unlikely to achieve water quality outcomes proposed in this package by 2025. We support using existing industry frameworks such as NZ-GAP.

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**Proposed National Environmental Standards for Freshwater**

**Irrigated Farming**

14. The WRII consider that irrigation should not be related to a specific parcel of land but should be based on water take for irrigation purposes under Good Management Practice.

Signed:

Waikato Regional Irrigators Inc.

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