To: Hon. David Parker

Submission on: ACTION FOR HEALTHY WATERWAYS – A DISCUSSION DOCUMENT ON NATIONAL DIRECTION FOR OUR ESSENTIAL FRESHWATER

Date: 31 October 2019

Submission by: Personal details removed

1.0 SUMMARY

The Stratford District Council (SDC) thanks the Minister for the opportunity to comment on the Government's Essential Freshwater proposals.

The changes to freshwater legislation and management proposed in the discussion document will directly impact our district's urban and rural communities, as well as our own working environment (particularly in relation to three waters, assets and infrastructure management). These impacts include increased regulatory pressure on the farming sector, a significant reduction in profitability of farming, and increases to the cost of council provided regulatory and essential services.

As a result, we have many concerns including the wellbeing and the mental health impact on our rural families and communities in particular, which are already affected by the Zero Carbon Bill and the proposed pricing of agricultural emissions. Their stress levels have been further exacerbated by the way this consultation has been carried out. The initial six-week timeframe is too short for such a significant policy proposal and spring is a busy and stressful time for farmers.

Similarly, from a local government perspective, the timing of the consultation was ill-considered, given the already short consultation time frame spanned country-wide local government elections. Elected officials will only be sworn in a day or two before the deadline for submissions. While we
appreciate the extension granted to the submission time frame, it has done little to rectify this fundamental error.

SDC supports the submissions made by the Taranaki Regional Council (TRC) and Local Government New Zealand (LGNZ). Being a small rural council, we are not resourced to address the proposal to the same level of technical detail as TRC and LGNZ and we are grateful to these organisations for taking a leadership role in this matter.

Similar to the views expressed by TRC and LGNZ, SDC supports the reform objectives and the desire to improve water quality and ecosystem health. We therefore share the stated aim of the Government's 'Essential Freshwater – Action for healthy waterways' package – stopping further degradation of freshwater quality and restoring rivers to health over a generation. But the proposals contained within the package raise many issues for us.

Increased regulatory pressure on the farming sector will have direct and indirect impacts on our community's ratepayers. Agricultural and primary industry related production and processing employs the majority of local people in the Stratford district, either directly, or indirectly via supporting services, industries, and our main rural service towns. Farming has been integral to our social, cultural and economic wellbeing for well over 100 years. The agricultural primary sector has been the biggest contributor to economic growth in our district for many decades. When they are hurting, we are hurting.

Despite our agriculture-heavy land-use across the district, the health and quality of Taranaki's rivers, streams, and waterbodies have consistently and significantly improved over the last 25 years, due primarily to voluntary restoration planting, fencing, and land retirement (where appropriate) carried out by farmers through the TRC's Riparian Management scheme.

However, the Essential Freshwater proposals do not appear to have taken these extremely successful voluntary approaches into account, and instead propose a "one-size-fits-all" regulatory approach to freshwater management for all waterbodies, across the entire country.

2.0 SPECIFIC CONCERNS

2.1 Impacts on the socioeconomic wellbeing of our communities

The short timeframe, and lack of in-depth consultation opportunities provided, for a review of the raft of documents relating to this significant and far-reaching regulatory change, does not allow our communities and private landowners time to develop a comprehensive reply to these proposals. They feel disappointed and disenfranchised that they have not had a chance to adequately respond to these proposals, especially as the proposals could be life-changing for many of them, particularly those in our farming communities.

Farming and its associated food production sectors in the Stratford district support an enormous variety of service industries, which in turn contribute to the vibrancy, vitality, and viability of our towns and communities.

However, many members of our communities are extremely concerned about the implications of these proposed regulations, as the significant drop-off likely for
farm's incomes, because of increased regulatory and compliance costs, is likely to have a knock-on effect to our service industries and our small towns.

The added stress these proposals have caused to our farming communities is exacerbating the mental health issues and distress that already exists there, and which this Government has stated it is trying to tackle. In addition, these are not the only Government-led regulatory reforms our farmers are dealing with, as farmers are already under stress relating to the implications from this Government's raft of legislative changes and proposed regulations including the Carbon-Zero Bill and proposed pricing of agricultural emissions.

SDC believes that the regulation levels discussed in these proposals will cause significant harm to the wellbeing of our communities.

2.2 Concerns over rates increases required to fund monitoring and compliance costs for this programme

SDC and our communities are questioning how the new legislative requirements in these proposals will be paid for, particularly when the rates burden for our district will predominantly fall on sparsely populated rural areas. This could raise significant affordability issues in rural communities, exacerbate our already existing socio-economic inequalities, and thereby compromise the ability of farmers or landowners to undertake the environmental outcomes sought through these proposals.

There appears to be little cost/benefit analysis in these proposals, either to Councils and/or their communities. SDC would like to see a rigorous cost/benefit analysis undertaken by central government, before these proposals are considered further.

2.3 Impact on wastewater treatment costs and rates

SDC provides wastewater treatment to the urban area of Stratford through a reticulated network, as well as to its rural communities by receiving septic tank waste. Wastewater disposal and treatment provides an essential service for reticulated properties as well as rural properties and is not something the community has the option to discontinue. Any costs incurred as a result of the government's Essential Freshwater proposals will have to be funded by our ratepayers.

Through the existing resource consenting process, SDC has continuously improved the quality of discharge from its treatment facility and is currently undergoing further review for upcoming improvements. This process is data and science based. The improvement programme is a long term investment for our community.

Changing the regulatory framework or shortening the time frames for improvements to wastewater discharge to waterways will put current investment at risk and ultimately place increased cost on our ratepayers. These costs have to be considered in addition to all other costs resulting from these proposals, rather than in isolation.
3.0 WHAT WE WOULD LIKE TO SEE FROM HERE

- The Ministry for the Environment to undertake a comprehensive re-think of the Essential Freshwater package's regulatory bottom-lines for fresh water.
- A responsible approach that acknowledges and addresses socio-economic factors and specific financial implications for farmers and our community.
- Flexibility to develop and deliver localised situations and recognise existing initiatives that are already working effectively.