Submission on Action for Healthy Waterways Consultation

Given name(s): Per

Company name: Wairarapa Water User’s Inc. Soc.

*Surname: Personal

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*Region: Greater Wellington

Phone: Personal

*Email: Personal details removed

*Submitter type (individual, NGO, business/industry, local government, central government, unspecified/other):

Introduction

- We represent water users in the Wairarapa
- Our members include farmers from the sheep and beef, dairy, arable, viticulture and horticulture sectors.

We are interested in the issues because we want a sustainable future producing good food and beverage reliably for our consumers.

We are keen to know the extent of our impact on the environment, not some generic average theoretical impact.

We also need to know that changes we are being asked to make will make a difference.

Essential freshwater is about having healthy waterways leading to those who rely on them (including us and our descendants) being healthy.

Of course we agree with this vision but we also desire good food and beverage and value the holistic wellbeing of our community.

We understand that just by our presence, we and the animals and birds we brought with us will not see the environment as the first inhabitants found it.
However altered though, the land and water still needs to be of a standard that can sustain life.

**Discussion of proposals**

We support a vision of swimmable waterways and safe drinking water.

We support the use of farm environment plans linked to monitoring as a way to target action that makes a difference.

We support keeping animals out of waterways.

We do not support making the set-back a blanket 5 metres. Rather the set-back should be according to assessed risk of contamination and consider practicalities of the location.

The proposals do not adequately recognise work done to protect the land and water nor do they display an understanding that the consequences of this work may be still coming.

We are talking about the effects of fencing off the waterways, tree planting, effluent management including storage, improved fertiliser management. These initiatives have been rapidly developed and implemented, especially in the last 2 decades.

Much has been done and the effects of the actions have been seen and will continue to appear.

Some areas are not at the level they need to be and either patience is required or accurate monitoring to see where the problem is originating and where in the catchment action is necessary.

Asking action on properties where no difference will be made will result in a lack of confidence in regulators.

We support measuring ecosystem responses and taking an adaptive management approach when community set targets are not met.

We think that using DIN and DRP attributes needs more work and explanation first.

We would like the Government to show that they have evaluated the impact of their proposals, and the manner that they have been presented, on communities and the country in terms of economics and human wellbeing.

We want to work together as a community to achieve this admirable vision. There is no need to throw the baby out with the bathwater!

We have been involved in the Greater Wellington Regional Plan review for the last 6 years and in the Ruamahanga Whaitua plan for 4 of those years.

*The Greater Wellington Regional Council has stated that freshwater quality is broadly improving and “the absence of compelling evidence about wholesale degradation of freshwater quality throughout the region.”*
It is unreasonable to expect that our environment should be the same as it was in pre-human times.

Solutions we suggest where necessary include;

- Supporting land users by good Farm Environment Plan management. Work alongside, not by strict regulation.
- Supporting catchment communities as they have the potential to best understand their issues and to best develop solutions to problems.
- Storage of water to improve supply reliability and lessen environmental pressure at stress times of year.

We support the submissions made by IrrigationNZ, Fonterra and DairyNZ as being balanced and reasonable.
Submission points to discuss (any or all of these – fill in and/or delete as required)

<table>
<thead>
<tr>
<th>Proposal</th>
<th>Agree or disagree</th>
<th>Reasons for agreeing or disagreeing</th>
<th>Changes sought</th>
</tr>
</thead>
<tbody>
<tr>
<td>Te Mana o te Wai and strengthening Māori values</td>
<td>Neither Agree nor disagree</td>
<td>Needs clearer definition</td>
<td>Other values need to be recognised as well</td>
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<tr>
<td>New planning process for freshwater through amending the RMA</td>
<td>Agree</td>
<td>As long as it simplifies the process while enabling fair consultation and input from all interested parties</td>
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<td>Exceptions for major hydro schemes</td>
<td>Agree</td>
<td></td>
<td></td>
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<tr>
<td>New attributes and national bottom lines – dissolved inorganic nitrogen and dissolved reactive phosphorous</td>
<td>disagree</td>
<td>Our position is that these new ‘ecosystem health’ nutrient thresholds are not scientifically robust and are unlikely to achieve the improvements in the health of waterways sought by the community</td>
<td>We support policies that protect ecosystem health alongside swim ability. We do not support the proposed nitrogen and phosphorus bottom lines as the most effective way to achieve this. Our position is that these new ‘ecosystem health’ nutrient thresholds are not scientifically robust and are unlikely to achieve improvements in waterway health as sought by the community.</td>
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<tr>
<td>Improving protection for threatened indigenous species</td>
<td>Agree</td>
<td></td>
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<td>Providing for fish passage</td>
<td>Agree</td>
<td></td>
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<tr>
<td>Measure/Proposal</td>
<td>Agreement/ Opposition</td>
<td>Condition/Argument</td>
<td>Outcome/Recommendation</td>
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<tr>
<td>No further loss of streams</td>
<td>Agree in part</td>
<td>Inevitable in some situations</td>
<td>Allow offsetting to achieve best outcomes</td>
</tr>
<tr>
<td>No further loss of wetlands</td>
<td>Agree in part</td>
<td>Inevitable in some situations</td>
<td>Allow offsetting to achieve best outcomes</td>
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<tr>
<td>Reducing sediment</td>
<td>Agree</td>
<td></td>
<td></td>
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<td>Higher standards for swimming water quality</td>
<td>Agree</td>
<td></td>
<td>Standards to apply to well used swimming &quot;Spots&quot; during the Swimming &quot;Season&quot;</td>
</tr>
<tr>
<td>Real time water use monitoring (telemetry)</td>
<td>Agree in part</td>
<td>Not necessarily most cost effective solution for all sites</td>
<td>Telemetry must be Practical for the site</td>
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<td>There needs to be a corresponding use of this data (other than just yearly reconciliation)</td>
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<td>Drinking water</td>
<td>Agree</td>
<td></td>
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<td>Storm water and waste water (urban)</td>
<td>Agree</td>
<td></td>
<td></td>
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<tr>
<td>Restrictions on further intensification of rural land use (including irrigation)</td>
<td>Disagree</td>
<td>Irrigation or land use change is not a precursor to Intensification or necessarily higher nutrient loss Management practice can have a larger impact</td>
<td>Restrictions need to be catchment based</td>
</tr>
<tr>
<td>Compulsory farm environment plans with a freshwater module</td>
<td>Agree in part</td>
<td>Should be Voluntary but allow industry to make mandatory. Should not be used as a enforcement tool as this will stifle innovation</td>
<td>Industry lead mandatory plans Clear rules under regional Plans Overseer is not a regulatory tool, should only be used for guidance</td>
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<tr>
<td>Action</td>
<td>Agreement</td>
<td>Description</td>
<td>Notes</td>
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<td>Immediate action to reduce nitrogen loss in specified catchments</td>
<td>Agree in part</td>
<td>The Parkvale catchment. The Ruamahanga Whaitua has established a clearer catchment approach to the problem and solution</td>
<td>Remove Parkvale stream from specified catchment list</td>
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<td>Stock exclusion</td>
<td>Agree in part</td>
<td>The 5m rule everywhere is not appropriate. The cost to change from industry lead exclusion to a national one size fits all needs to show this is the best bang for buck.</td>
<td>Exclusion is appropriate but need to establish the need for more 5m</td>
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<td>Controls on winter grazing</td>
<td>Agree in part</td>
<td>Use good management practice</td>
<td>Industry lead standards “right of supply” Regionally specific</td>
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<tr>
<td>Restricting feedlots</td>
<td>Agree</td>
<td>Use good management practice</td>
<td></td>
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<td>Controls on stock holding area</td>
<td>Agree</td>
<td></td>
<td>Our position is that stock holding areas should be a permitted activity and be included as part of an FEP, as long as the defined conditions are met.</td>
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