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Clean Water Consultation 2017
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A submission by **Ngāti Rangī Trust** on:

CLEAN WATER 2017

Ngāti Rangī Trust

1. Ngāti Rangī Trust is the iwi authority for Ngāti Rangī, an iwi based on the southern slopes of Matua te Mana, or Ruapehu. Our cultural identity is linked to his essence, the lifeblood of our people cascade as waters from his slopes, his peaks above are our sacred altar. The vision statement for Ngāti Rangī is:

*“Kia mura ai te ora o Ngāti Rangī nui tonu ki tua o te 1,000 tau.
Ngāti Rangī continues to vibrantly exist in 1,000 years”.*

2. Our vision statement stands as a testament to our role and responsibility to be active kaitiaki for our environment to ensure our descendants, in 1,000 years time have clean water, fresh air and healthy land. Our maunga Ruapehu is the mātāpuna, the source of our waterways from the mountain to sea; their clarity, their uniqueness, their quality, and their voices speak to our wairua, give life to our lands and are our lifeblood.
3. The intrinsic link iwi have with water is imbedded within our whakapapa, it is reiterated in our pepeha and revealed through our cultural and spiritual connections and customs we share with our traditional water bodies. Physical contact with, and unhindered access to our wai is essential to maintaining our traditional practices.

4. As tangata tiaki, the maintenance and improvement in the quality of our air, water and whenua are a mechanism for the management of a sustainable and holistic environment which we strive for as a people.
5. Whilst we are an iwi that recognise and support the socio-economic health and wellbeing of local communities; we reflect that the health and wellbeing of our rivers and streams reflect on the health and wellbeing of our communities which is heavily linked with the quality and quantity of mouri.
6. The lifeforce of individual awa and it's health is a representation of where we are as people; we are inextricably linked and this link underpins our connection to our waterways. Therefore, it indicates why the demand we have of policy and legislation to trust in this relationship for the betterment of our people, community and as a nation is high.
7. Wai ora. Wai tapu. Wai mate. Wai tai. Wai mana. Te mana o te wai. Water has many purposes. It is an authority unto its own, and it holds its own mana. Whilst Ngāti Rangī rely on water for cultural, traditional and spiritual purposes our awa have the authority to flow as naturally as possible, to sing its natural song, and to house life or natural qualities as it pleases.
8. Therefore, it is our responsibility is to ensure that the quality of our environment; our air, water and land, is of a better state, but at the very least, no worse than the conditions that exist currently. In order to fulfill these responsibilities we look for strong policy to safeguard our lifeblood – our waterways, such as the National Policy Statement for Freshwater Management, so that our responsibilities can be fulfilled.

Treaty of Waitangi Settlement

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9. Ngāti Rangī has recently signed their Agreement in Principle (AIP) with the Crown. Within this AIP is the statutory recognition of the Whangaehu River and the entire catchment. It is the origin of this waterway, the Crater Lake of our ancestral maunga Ruapehu, otherwise known as Te Wai-ā-Moe. Our tupuna awa, Whangaehu technically holds no ecological importance as it does not (for the most part) sustain life. However, this is our most significant awa culturally and spiritually due to its origin and special cultural properties consisting of; wai ora, wai Tapu, wai mouri, wai mana and wai mate that exemplifies the holistic view of Te Mana o te Wai. The settlement will provide for the statutory recognition of the Whangaehu Catchment, its unique physical and cultural properties in conjunction with the intrinsic relationship between Ngāti Rangī and the wider Whangaehu Catchment. The negotiations will further explore the shape of the statutory recognition, and the manner in which it will be advanced and recognised by

decision-makers. This potentially includes a form of legal weighting in decision-making processes.

Te Mana o te Wai

10. We make mention of the significant improvement made to the section 'National Significance of fresh water and Te Mana o te Wai'. We recognise that Te Mana o te Wai reflects the importance of a river being able to behave as a river; it maintains the essential life supporting capacity, it has the ability to flow unrestricted, it maintains a healthy variable flow, it's voice (as we interpret; the sound emitted from the flow of a river) is vibrant, and that we as Ngāti Rangī remain connected through our continued interaction with our waterways. We respect that health and well-being of waterways needs to remain at the forefront of decision-making.

Cultural Health Index

11. Many rivers within the Ngāti Rangī rohe have unique qualities that hold high cultural and spiritual values for our people. These rivers (Whangaehu River, Wāhianoa River, Mangaehuehu Stream, Waiakaki Stream, Tomowai River) contain unique natural characters such as elevated pH making them devoid of macro-invertebrates along certain stretches and may result in limited ability to support life in these areas. We want to ensure that culturally significant rivers such as these are afforded some recognition with considering any applications for discharge. A Cultural Health Index for Streams and Waterways is a tool for nationwide use.
12. The Cultural Health Index (CHI) created and published by Gail Tipa and Laurel Teirney for the Ministry for the Environment in 2006 is a leading tool that should be established nationally. This CHI measure should be aligned alongside the MCI measures to provide a true measure of Te Mana o Te Wai for all waterways especially rivers with the characteristics that hold low MCI value, but high CHI value such as the rivers mentioned above.

Interpretation

13. Whilst we understand the difficulties of having a fully inclusive (all waterways) policy we also strongly believe that it is irresponsible to put restrictions on Objective A3, Policy A5 and Policy CA(f)(iaaa). The clean water policy should mean all waterways not just "large rivers and lakes".

Water Quality (A)

14. Whilst we support the concept presented as Section A: Water Quality; Ngāti Rangi believe that it can be further reinforced by a relationship between Water Quality and Te Mana o Te Wai.

Therefore; we recommend the following ammendments to this section;

15. Objective A1 must also safeguard the values of Te Mana o te Wai in order to sustainably manage the use and development of land, and discharge of contaminants. We believe that instilling the holistic nature of Te Mana o Te Wai into this objective will enable a more holistic and sustainable approach to the management and use of land around Aotearoa.
16. Objective A2 must also outline a need to protect the values of Te Mana o Te Wai to ensure that it remains in the forefront of decision-making regarding the health and wellbeing of our waterways. This ensures that all three objectives within Water Quality (A) are provided for in the first instance, **above** the economic well-being. Stronger support for improved water quality is the direction New Zealand needs to be heading so ensure a sustainable use of water for all forums.
17. In conjunction with this, Objective A2 should also incorporate a subsection specifically recognising the necessity in improving the quality of **urban rivers** that are significantly degraded from human activities.
18. In response to Objective A3; we recognise the significance small streams, puna and aquifers have on the larger river systems. Within our rohe, these smaller rivers and headwaters are of pristine quality and should be afforded the protection to retain and maintain these high quality values as far down the catchment as possible. The term “more often” is not strong enough to ensure the overall health of waterways, they should be swimmable at least 90% of the time.
19. Despite the Policy AAA1 (Te Mana o te Wai) reflecting the need to consider and recognise Te Mana o Te Wai, we recommend that it is inserted into Policy A1 to better encourage its uptake by Regional Council’s.
20. Careful consideration needs to be applied to Policy A4; specifically with **1.a**. Many rivers within the Ngāti Rangi rohe have unique qualities that hold high cultural and spiritual values for our people. These rivers (Whangaehu River, Wāhianoa River, Mangaehuehu Stream, Waiakaki Stream, Tomowai River) contain unique natural characters such as elevated pH making them devoid of macro-invertebrates along certain stretches and may result in limited ability to support life in these areas. We want to ensure that culturally significant rivers such as these are afforded some recognition with considering any applications for discharge.

Water Quantity (B)

21. Ngāti Rangi supports mechanisms that protect the quality of water we have in our rohe. We acknowledge that our rohe is predominantly rural, supporting both agricultural and horticultural industry that has a heavy reliance on water takes. The necessity in upholding Te Mana o Te Wai presents strongly to Ngāti Rangi in relation to water quantity, too often have we battled the court system with water takes that decimate our rivers ecosystems.
22. Objective B1 is absent of iwi and community values associated with local water bodies when considering the taking, using, damming or diverting of freshwater; therefore Te Mana o Te Wai and its recorded value systems needs to be inserted into Objective B1 to ensure a more holistic approach is reflected.
23. Policy B1 should read 'and set environmentally **sustainable** flows and/or levels for all freshwater management units...'; we acknowledge that as a result of water takes, damming and diverting many of our rivers flat line and lose flow variability required to maintain a life-supporting capacity.

Integrated Management (C)

24. Ngāti Rangi support the concept of integrated management of freshwater in its recognition of a collective approach and responsibility to the health and wellbeing of our waterways.

National Objectives Framework (CA)

25. In relation to Policy CA1, Ngāti Rangi recommends the formal collaboration with iwi and local communities in the identification of freshwater management units.
26. With Policy CA2, we appreciate the need to have regard to local circumstances as requested in **Paragraph 20**. We hold concerns however that this will create opportunities for a prioritisation of economic outcomes over environmental ones.
27. [REDACTED] in addition to **Paragraph 26.**, we strongly disagree with multiple aspects of **Appendix 2**, which Policy CA2 refers too. Therefore, until adequate changes can be made to **Appendix 2** we can not support this reference.
28. 'Assigning an attribute state at or above the minimum acceptable stage', this description indicates that New Zealand accepts poor quality management that will result in poor quality water. Ngāti Rangi firmly believes that assigning higher levels of what is acceptable for individual attributes is the best and only option for the improvement of less than desirable water quality; whilst providing safety for better and pristine quality waterbodies. Thus assigning an attribute state at the minimum acceptable level is not acceptable, we do not support this. Central Government should be leading Aotearoa into a more sustainable future, thus making it mandatory for all freshwater management units to aim for improvement over a reasonable spatial scale.

29. Ngāti Rangi do not support Policy CA3; we believe it is the responsibility of the consenting authority to set policies that protect the life-supporting capacity of waterways; support community and iwi interaction and relationships with waterbodies. Therefore this policy, as it reads, compromises the ability of improvement in water quality, it compromises the ability of iwi and wider communities, in the future, to safely interact with waterways. In particular response to a) we refer back to **Paragraph 20**; the Whangaehu River, our tupuna awa, is often referred to as a 'dead river' due to its high pH level. However, this quality is highly prized by our people for cultural and spiritual reasons.
30. In response to Policy CA4, allowing waterways to remain in a degraded state or to deteriorate for a period of time runs the risk of obstructing the ability of the waterway to heal. We need to be bold in assigning higher target levels for water quality to ensure the longevity of this irreplaceable resource for our future generations, and for the sustainable future of industry.

Monitoring Plans (CB)

31. The only additional features Ngāti Rangi recommend is that the selection of monitoring sites be developed in conjunction with iwi; to ensure that monitoring of the cultural health as a portion of mātauranga māori is undertaken at sites that have relevance to iwi and their cultural interaction with a waterway.

Tāngata whenua roles and interests (D)

32. Ngāti Rangi support the inclusion and involvement of iwi in relation to decision-making and strategic direction of the management, use and discharge of water within our rohe. We recommend however, that reasonable steps be taken to build the capacity of tāngata whenua throughout Aotearoa in the monitoring of local water bodies as outlined in **CB. Monitoring Plans**.

APPENDIX 1: National values and uses for fresh water

33. Ngāti Rangi are pleased with the holistic orientation the compulsory and additional National Values described within Appendix 1. However, we recommend that Te Hauora o te Wai, Te Hauora o te Taiao, Te Hauora o te Tangata become Compulsory National Values.

APPENDIX 2: Attribute tables

34. Many of the national bottom line limits describe in Appendix 2 are set at an unacceptable level to Ngāti Rangi. These unacceptable limits include periphyton, nitrate ammonia, dissolved oxygen, E.coli and cyanobacteria. We understand these bottom lines do not mean healthy

streams and rivers can be degraded to these levels but consequently, it does not support the health and well-being, or Te Mana o te Wai, of waterbodies that are continually stressed from human derived impacts. We have an expectation that strong leadership is required for waterbodies that are most in need, in order to improve their health and well-being.

Ngāti Rangi strongly disagree that the now “swimmable” status of waterways have been redefined as **540 E.coli per100ml** from the original, and more preferable goal of **260 E.coli per 100ml**. We maintain the stance that all waterways within Aotearoa need to aim towards swimmability (as defined by the original E.coli levels of 260 E.coli per 100ml).

To conclude; as users and kaitiaki of our natural world, Ngāti Rangi hold the responsibility is to ensure that the quality of our environment; our air, water and land, is of a better state, but at the very least, no worse than the conditions that exist currently. In order to fulfill these responsibilities we look for strong policy to safeguard our lifeblood – our waterways, such as the National Policy Statement for Freshwater Management, so that our responsibilities can be fulfilled. We encourage the government to be bold in supporting the health and well-being of our waterways, Te Mana o te Wai.

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Ohakune

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