
In the matter of: Proposed amendments to the National Policy Statement for Freshwater Management, 2017 (NPS-FM)

And: **WAIHOU IRRIGATORS INCORPORATED**
Submitter

And: **Ministry for the Environment (MfE)**

Submission on proposed amendments to the National Policy Statement for Freshwater Management 2017 (NPS-FM)

Dated: 27 April 2017 DRAFT

1. This submission is on behalf of WAIHOU IRRIGATORS INCORPORATED (WII) which supports and opposes the proposed amendments to the NPS-FM in part.
2. WII represent the interests of a significant proportion of irrigators within the Waikato Region, including dairy farmers, orchardists and commercial vegetable producers.
3. WII believes that all New Zealanders that use the land and water for food production and recreational values have a have a kinship relationship with the natural environment, including fresh water, through shared whakapapa. This is not a relationship unique to Maori and this universal relationship and consequent responsibility needs to be recognised, encouraged and acknowledged.
4. We support the need to improve water quality in terms of E. Coli Levels as expressed in the NPS-FM.
5. WII points out that water has already been allocated throughout New Zealand and that the NPS-FM is proposing a combined quality and volume approach to future allocation. Such an approach is supported, provided the framework is robust and sensible and recognises that Water is a productive input for New Zealand's food and economy and that it cannot be isolated from the other productive factors of land, climate, people and capital. Any amendment to the allocation process needs to be balanced and potential reductions in water availability need to be balanced with the other community needs. In the context of objective

AAA1 we believe that the wording is important and that Te Mana o te Wai be considered but should not over-ride all other considerations.

6. WII consider that the amendments to the NPS-FM fail to acknowledge the social and economic effects that may result by considering commercial vegetable production as an extractive industry. Fresh milk, fruit and vegetables is a necessity for good health and failing to adequately take this into account, and failing to provide for cultivation as a Te Mana o te Wai value, may be detrimental to community wellbeing and to the New Zealand economy.
7. We support the intention of Objective B1 to safeguard the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems of fresh water, in sustainably managing the taking, using, damming, or diverting of fresh water. **while providing for economic well-being, including productive economic opportunities.** We feel that providing for economic wellbeing including productive economic opportunities has been overlooked historically and support the inclusion of this statement.
8. We support objective B2 with amendments. We support the sustainable management of our freshwater resources and understand that to achieve this, further over-allocation of fresh water and the phasing out existing over-allocation are necessities. We do not however, consider that this is appropriately managed under the current regional frameworks and recommend also including the statement **while providing for economic well-being, including productive economic opportunities** to avoid regional councils reducing resources to the point that productive business operations are no longer sustainable. At the present time the focus is on regulating in relation to low flow conditions, but there are many situations where consents are being restricted under the guise of statistical guides and so called water efficiency parameters, when water could easily be available without impacting on flow or quality. This applies when there is significant marginal value that could accrue to that water being used, albeit less “efficiently” because it is a production limiting factor that affects the overall enterprise’s economic efficiency
9. WII does not support Objective B3 as it stands for the reasons outlined above. A dedicated focus on water use efficiency outside of periods when flow and quality are not being significantly impacted needs to be tempered by the other efficiency measures that face water users. If the concept of “efficient allocation” was modified to acknowledge this then we would be more supportive as it would give a more holistic approach to Resource management as distinct from just water management.
10. WII believes that policy B4 needs to be reworded as follows: **To protect both wetlands and outstanding fresh water bodies which have significant values.** The purpose of the rewording is to identify those wetlands that have a significant role to play in improving water quality. There are many examples of wetlands that do not make a significant difference to water quality and these should not be included in a blanket approach to protect all wetlands at all costs. Much of our highly productive land was once swamp and as our population increases some areas may well be needed to enable us to provide housing and land for food production.
11. Policy B5 and Policy B6 are supported with amendments. It is recommended that these policies include a statement **‘where clear and robust science supports freshwater resource availability’**. We have found that the interpretation on what may constitute ‘over-allocation’ can vary and in some cases there is no basis for decisions within a council. We consider that all decisions should provide for **economic well-being, including productive economic opportunities.** This is especially significant in the lower Waikato where the demands and continuing allocation to Auckland city has meant that the whole of the Waipa and Waikato river systems are now deemed to be fully, or over allocated, and yet the granting of Water to

Auckland City does not appear to be degrading the quality of the water upstream or downstream of the point of take.

12. WII support Policy B7 to the extent that 2.b. is amended to include the water quality component as well as the water flow component.
13. We consider that Policy C1 should reflect the integrated and sustainable management of resources at a [Fresh Water Management Unit level](#) as opposed to catchment level to remain consistent with proposed amendments and to encourage improved management. The management by Regional Councils of Land use in C1b) should be limited to the relationship of that land use to adverse effects on water quality
14. WII also consider that Mahi mara/cultivation should be retained in the values listed under Te Mana o Te Wai, as food production is essential to the health and wellbeing of our people. Families are already struggling to meet the healthy eating requirements recommended by the Ministry of Health. To remove cultivation from this category and to consider this an extractive industry is in conflict with the NPS-FM itself which requires the health and well being of our people and communities to be considered.
15. Under the CA. National Objectives framework Policy CA2 has added "[following discussions with communities, including tangata whenua](#)" WII believes that there is not sufficient emphasis on discussion with affected parties. In most cases where there is a land - water interaction there are no "owners" of the water, so any cost related to water quality improvement defaults to the land owners and or consent holders. The land owners and consent holders have a huge investment and bear the costs of these programmes but have no significant say in the strategies for achieving the objectives. The current Plan Change1 in the Waikato Region shows this very clearly, where a Stakeholder group was involved in the process, but the cheque writing component was very under represented. If we are to make real progress, the people who will be required to meet the costs, need to be a committed part of the process where the required level of investment is recognised and set up in such a way that the best return for the community is achieved from the investment. That return must be assessed by the improvements in water quality and the impact on the community as a whole.



28 April 2017

Fred Phillips - Secretary

Signed on behalf of Waihou Irrigators Incorporated