



National Policy Statement for Freshwater Management Implementation Review

Wellington – Te Upoko o te Ika a Māui

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Contents

Regional overview	5
Review methodology	9
Regional context for freshwater management	10
Existing plans	10
Governance structures	10
Iwi and hapū context	10
Approach to implementing the NPS-FM	12
Progressive implementation programme	12
Priorities	12
Iwi and hapū views	13
Stakeholder views	13
Progress in major catchments	13
Achieving the objectives of the NPS-FM	14
Setting freshwater management units	14
Values and objectives	14
Limit setting and allocation	14
Integrated management	14
Stakeholder views	15
Iwi and hapū views	15
Community engagement	16
Engagement strategy	16
Iwi and hapū views	16
Stakeholder views	17
Engaging with iwi and hapū	18
Engagement strategy	18
Iwi and hapū views	18
Stakeholder views	18
Engaging with territorial authorities	19
Stakeholder views	19

Decision-making	20
Capacity and capability for freshwater planning	21
Council	21
Whaitua committee members	21
Iwi and hapū	21
Stakeholders	21
Information	22
Supporting whaitua	22
Data management	22
Stakeholder views	22
Iwi and hapū views	23
Plan implementation	24
Implementation strategy	24
Non-regulatory work programmes	24
Conclusions and recommendations	25

Regional overview

The Wellington region covers a land area of about 8000 square kilometres, spanning the lower portion of the North Island up to Ōtaki in the west and across to the Mataikona River in the east.

Around half of the region's land is used for pastoral sheep and beef farming, one-third is native vegetation, around 8 per cent is exotic plantation forestry, 5 per cent is dairy farming and the remainder is urban, industrial and other uses. Although one of New Zealand's smaller regions by land area, Wellington has the third highest population, mostly concentrated in the cities of Wellington, Lower Hutt, Upper Hutt and Porirua.

Of the 14 lakes in the region, by far the largest is Lake Wairarapa and the surrounding wetlands (figure 1). A major flood control project in the 1960s and 1970s diverted the Ruamāhanga River away from the lake and drained much of the surrounding wetland system for farmland. Other major lakes include Lake Waitawa on the Kāpiti Coast, lakes Kohangapiripiri and Kohangatera on the south coast and lakes Pounui and Ōnoke in the Wairarapa. The region also contains several man-made reservoirs.

The Ruamāhanga aquifer covers nearly half of the region, including all of the central Wairarapa Valley and the region's most intensive farming. Groundwater is a complex mix of confined, semi-confined and unconfined aquifers, which are connected hydrologically to the rivers and wetlands above.

With regard to water quantity, most rivers and streams are fully allocated and, while estimates of groundwater resource availability are uncertain, most aquifers are approaching full allocation.¹ Groundwater levels in Wairarapa have been declining. Moreover, because the groundwater and surface water resources are closely linked, high demand in one is likely to impact upon the other.

About half of the total allocated water volume is used for town supply compared with a quarter used for irrigation (figure 2). Demand for water is increasing rapidly; the total volume of allocated water more than doubled between 1990 and 2010. While urban growth accounts for a large portion of the increase, the greatest increase in demand has been for irrigation mostly in the Wairarapa area.²

As is common throughout New Zealand, Wellington water quality and ecosystem health are best in the upper reaches of catchments and in areas with native vegetation or forestry.³ However, quality tends to decline in lower river reaches, in urban and town areas, or

¹ Land, Air, Water Aotearoa. No date. *Wellington region: Water quality*. Retrieved from www.lawa.org.nz/explore-data/wellington-region/water-quantity/ (30 June 2017).

² Greater Wellington Regional Council. 2012. *Freshwater Allocation and Availability in the Wellington Region: State and trends*. Retrieved from www.gw.govt.nz/assets/Our-Environment/Environmental-monitoring/Environmental-Reporting/Freshwater-Allocation-and-Availability-SoE-report.pdf (30 June 2017).

³ Greater Wellington Regional Council. 2016. *Rivers State of the Environment monitoring programme: Annual data report 2015/16*. Retrieved from www.gw.govt.nz/assets/Our-Environment/Environmental-monitoring/Environmental-Reporting/Rivers-State-of-the-Environment-monitoring-programme-Annual-data-report-2015-16.pdf (30 June 2017).

catchments dominated by intensive farming. High levels of nutrients, sediment and bacteria, and poor clarity are common issues in these areas.

Most Wellington rivers are considered safe for swimming and other primary recreation most of the time.⁴ However, urban stormwater or wastewater overflows and run-off from agricultural areas have increased microbial levels in several rivers, particularly following rain and flooding events. As a result, a number of river sites monitored for recreational health often do not meet guidelines for primary recreation. In addition, toxic algal blooms are common in the lower Hutt, Ruamāhanga, Wainuiomata and Waipoua rivers, particularly during the late summer when temperatures are higher and water levels are low.

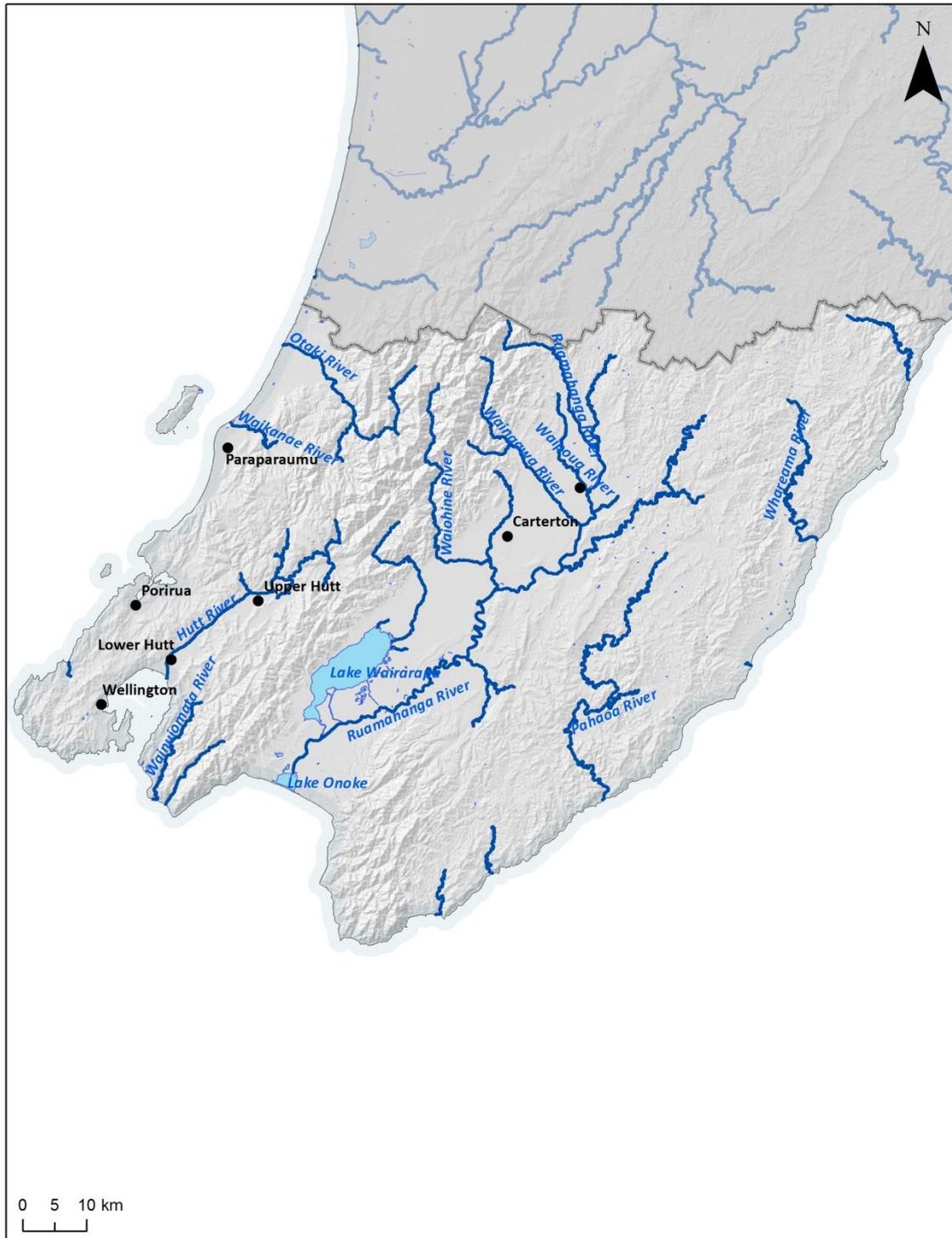
Water quality in lakes Wairarapa, Ōnoke and Waitawa is degraded, with high levels of nutrients, poor clarity, poor ecological health and occasional toxic algal blooms.^{5,6} In contrast, lakes Kohangapiripiri, Kohangatera and Pounui, which draw from catchments covered mostly in native forest, have much better water quality and ecological health. Groundwater quality is generally good but some aquifers show high levels of nitrates, particularly around Ōtaki, Te Horo and the Wairarapa Valley.

⁴ Greater Wellington Regional Council. 2016. *Is it safe to swim? Recreational water quality monitoring results for the 2015/16 summer*. Retrieved from www.gw.govt.nz/assets/Our-Environment/Environmental-monitoring/Environmental-Reporting/Recreational-Water-Quality-Annual-Report-2016-web.pdf (30 June 2017).

⁵ Greater Wellington Regional Council. 2012. *Lake Water Quality and Ecology in the Wellington Region*. Retrieved from www.gw.govt.nz/assets/Our-Environment/Environmental-monitoring/Environmental-Reporting/Lake-water-quality-and-ecology-SoE-report.pdf (30 June 2017).

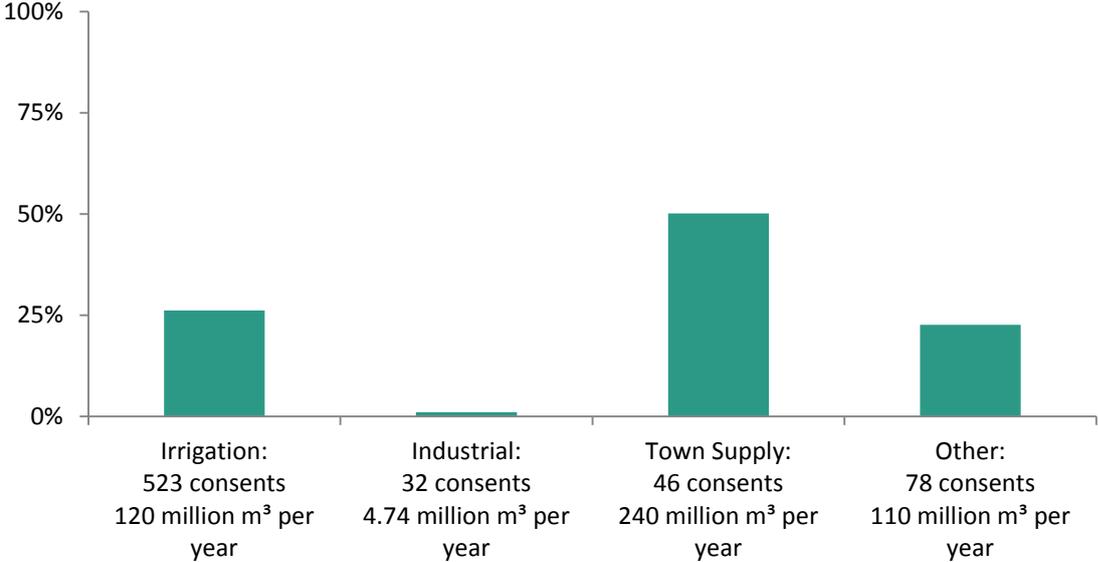
⁶ Greater Wellington Regional Council. 2016. *Lakes Water Quality and Ecology monitoring programme: Annual data report 2015/16*. Retrieved from www.gw.govt.nz/assets/Our-Environment/Environmental-monitoring/Environmental-Reporting/Lakes-Water-Quality-and-Ecology-monitoring-programme-Annual-data-report-2015-16.pdf (30 June 2017).

Figure 1: Major water bodies in the Wellington region



Source: Ministry for the Environment

Figure 2: Consented water take volumes by primary use in the Wellington region



Source: Land, Air, Water Aotearoa data

Review methodology

The information and analysis contained in this report are based on evidence collected from a questionnaire completed by Greater Wellington Regional Council (GWRC), a series of interviews and panel discussions with relevant parties, planning documents and associated reports, and the Ministry for the Environment's ongoing relationships and projects across the region. The overall review team consisted of officials from the joint Ministry for the Environment and Ministry for Primary Industries Water Directorate with the assistance of two independent consultants who are both certified hearings commissioners with more than 30 years of experience in freshwater management.

The review team conducted a series of panel discussions with GWRC executives and elected councillors, senior GWRC staff, tāngata whenua and stakeholder representatives. The regional stakeholder panel included a small number representatives from a range of interests including territorial authorities, environmental organisations and industry sector groups. Most were members of whaitua committees (see discussion below). The review hui panel included a small number of participants from multiple iwi and hapū who had been personally involved in freshwater management discussions or were members of local collaborative groups; however, not all iwi and hapū in the region were represented at the hui. Additional interviews and panel discussions were held with representatives from national sector organisations. Following each meeting, attendees were given the opportunity to revise or supplement the meeting notes to ensure their views were recorded accurately.

While the review team has made efforts to confirm information where possible, much of the information included in the review is based on the accounts and perspectives of those involved and often cannot be verified independently.

Stakeholder and tāngata whenua representatives did not necessarily speak with mandate as official representatives of their iwi, hapū or organisation nor are they presumed to represent all in their wider communities. They were, however, primary sources with direct experience of GWRC's work.

Because of varying regional contexts, some issues are considered more or less relevant in different regions. Therefore, some topics that were not raised by GWRC, iwi and hapū or stakeholders have been omitted from this chapter.

Regional context for freshwater management

Existing plans

Over the past few years, GWRC has undertaken a process to review its five regional plans: air quality management plan, freshwater plan, plan for discharges to land, soil plan and coastal plan. As a result of this review, the Proposed Natural Resources Plan (Proposed Plan) was developed. The National Policy Statement for Freshwater Management (NPS-FM) was introduced during this process.

Since 1989, Lake Wairarapa has been the subject of a Water Conservation Order prohibiting GWRC from granting any new consents to take water from the lake.

Governance structures

Territorial authorities

The Wellington region includes all or part of nine district or city territories: Kāpiti Coast District, Porirua City, Wellington City, Hutt City, Upper Hutt City, South Wairarapa District, Carterton District, Masterton District and part of Tararua District.

Three waters

Wellington Water Ltd was established in September 2014 and is owned by the Hutt, Porirua, Upper Hutt and Wellington city councils and GWRC. The five councils are all equal shareholders. Its role is to manage drinking water, wastewater and stormwater services of the council owners. A representative from each authority sits on the Wellington Water Committee that provides overall leadership and direction for the company. Wellington Water Ltd does not own any drinking water, stormwater, wastewater or bulk water assets. Nor does it set policies or control rates or user charges. These functions remain with the local councils and GWRC.

Iwi and hapū context

Six iwi have rohe within the greater Wellington region: Ngāti Kahungunu ki Wairarapa, Taranaki Whānui ki te Upoko o te Ika, Ngāti Toa Rangatira, Te Atiawa ki Whakarangotai, Ngāti Raukawa ki te Tonga and Rangitāne o Wairarapa. The region also contains significant populations of taura (Māori affiliated with iwi outside of the region but who are living in the region).

GWRC says it has been committed to involving iwi in freshwater management for a long time. As a result, multiple co-governance and co-management structures were already in place before the NPS-FM.

For more than 20 years, tāngata whenua have been involved in regional governance through the Ara Tahi forum. Ara Tahi comprises two members from each of the six regional iwi plus the chair, deputy chair and chief executive of GWRC. The forum discusses regional strategy,

oversees issues relevant to the partnership between tāngata whenua and GWRC and advises GWRC on meeting its statutory obligations.

In 2009, Te Upoko Taiao – Natural Resource Management Committee was created to give iwi an even greater role in planning. With equal representation from seven elected councillors and seven tāngata whenua, the committee is responsible for overseeing regional plan development. Tāngata whenua are also represented by non-voting members on several standing GWRC committees. In all cases, these representatives are nominated by iwi but asked to speak for the interests of all tāngata whenua in the region rather than any specific iwi.

A Memorandum of Partnership was signed between GWRC and the six mandated iwi authorities in 2013. This updated and strengthened long-standing existing agreements as to the relationship between iwi and GWRC.

Approach to implementing the NPS-FM

Progressive implementation programme

GWRC had already begun a process to review its existing plans before the NPS-FM was introduced in 2011. This work programme addressed requirements in the original NPS-FM but was changed to fit requirements of the National Objectives Framework process outlined in Part CA of the NPS-FM 2014. GWRC's revised approach has been to set region-wide provisions for fresh water in the Proposed Plan and then to add chapters with catchment-specific objectives, policies, limits and rules over time. The whitua process is intended to provide a decentralised approach to establishing priorities and programmes within each whitua (catchment area).

The Proposed Plan was approved by GWRC for public notification on 31 July 2015. Hearings are currently under way and scheduled to continue into 2018.

The Proposed Plan identifies five distinct whitua within the region: the Wairarapa Coast, Ruamāhanga, Wellington Harbour and Hutt Valley, Te Awarua o Porirua and Kāpiti Coast. Groundwater in the region is addressed through the Ruamāhanga, Wellington Harbour and Hutt Valley and Kāpiti Coast groundwater management zones.

For each whitua, GWRC has formed or will form a collaborative group called a whitua committee. These committees are charged with developing a whitua implementation programme (WIP) that identifies community values and contains freshwater objectives and recommendations for both regulatory and non-regulatory methods of managing water. The committees do not have direct decision-making authority, but GWRC says that it will 'give weight to' recommendations contained in the WIP when developing whitua plan chapters. If GWRC considers any recommendations in the WIP to be inconsistent with regional policies or statutory requirements, those specific provisions will be referred back to the Whitua Committee for revision.

GWRC anticipates having both Ruamāhanga and Te Awarua o Porirua whitua chapters included in a plan variation in late 2017. The intention is to establish the Wellington Harbour and Hutt Valley Whitua Committee in 2017 when GWRC staff resources are freed from work on the first two whitua committees.

Priorities

GWRC has elected to stage the whitua processes, starting with the Ruamāhanga catchment because it considers this to be the most challenging. Due to the intensive agricultural activity in the area, the catchment has the most complex issues and requires the most modelling. GWRC's intention was to apply these models to other catchments using the lessons it had learnt.

Porirua has an established freshwater management programme, so GWRC considered this catchment to be less of a priority. The Wairarapa Coast whitua is considered to be the easiest and therefore likely to be conducted last.

Iwi and hapū views

The tāngata whenua representatives we spoke to felt that GWRC has done a good job of maintaining relationships with iwi and hapū overall. They say GWRC has been receptive to matters that were important to them and engaged openly. The hui participants support engagement through Te Upoko Taiao. They see that it has potential to resolve conflicts between iwi and the wider community.

Hui participants we spoke to said that GWRC is still learning from the Ruamāhanga whitua process. They suspect this is why it is overseeing the process so closely, to ensure it stays within scope.

Stakeholder views

Stakeholders said that the Proposed Plan has demonstrated that GWRC is working hard to improve freshwater management. They consider the Proposed Plan a significant step in the right direction and an honest attempt to implement the NPS-FM. From a plan-making perspective, the NPS-FM gives councils clear priorities and objectives. GWRC has responded well via its Proposed Plan, but its strategy for putting the plan together should have included stakeholders at an early stage to better identify the issues in the region.

Stakeholders we spoke to largely support the whitua process as a significant improvement from the traditional Resource Management Act 1991 (RMA) planning process. However, they have concerns about a perceived lack of transparency regarding the rationale for the process and the order of catchment priority.

Progress in major catchments

RUAMĀHANGA

The Ruamāhanga Whitua Committee was established in 2013. The committee has developed a set of objectives for the whitua and, at the time of writing, is working through different management scenarios under various rules, limits and non-regulatory interventions. It is scheduled to complete a WIP with management recommendations in late 2017.

PORIRUA HARBOUR

The Te Awarua o Porirua Whitua Committee was established in 2015. It is currently considering objectives and limits for the catchment. It aims to complete a WIP in 2017.

WELLINGTON HARBOUR AND HUTT VALLEY

A whitua committee is being established in 2017. GWRC aims to complete a WIP by 2019.

KĀPITI COAST

A whitua committee is being established in 2017. GWRC aims to complete a WIP by 2019.

WAIRARAPA COAST

A whitua committee will be established in 2020. GWRC aims to complete a WIP by 2022.

Achieving the objectives of the NPS-FM

Setting freshwater management units

GWRC has asked the whitua committees to set freshwater management units for their whitua. The Ruamāhanga Whitua Committee has identified seven, based on the distribution of different pressures, geological features and current water quality. At the time of writing, this exercise has not been undertaken for other whitua.

Values and objectives

Values are being identified through the whitua committees. For the Ruamāhanga catchment, GWRC says that the community's values are fairly consistent. It has identified seven standard values but these may apply slightly differently in some places. Objectives might vary between different freshwater management units.

GWRC says that it was careful not to pre-define values for the community. It also avoided using planning or scientific terminology when discussing values. After it had obtained the values from the community, they were reconciled against the values in the NPS-FM.

GWRC says that the significant values of wetlands and outstanding water bodies are protected, including for water quality and indigenous biodiversity, in the Proposed Plan.

Limit setting and allocation

The Proposed Plan includes a set of interim environmental flows and levels that apply region wide until over-written for each whitua through the whitua process. These limits have sometimes simply been pulled from previous plans, sometimes as back as far as the 1980s. GWRC uses a mean annual low flow percentage as a default when it does not have site-specific data. GWRC has developed a groundwater–surface water interaction model that changed its understanding of allocation of groundwater significantly in the Ruamāhanga catchment.

The Proposed Plan includes methods to phase out over allocation of water quantity. This includes allocation limits and rules in the Proposed Plan to manage reduction in abstractions over time, and improvement in the efficient use of abstractions. There are also provisions in the Proposed Plan that are directed at promoting and encouraging the efficient use of water.

Integrated management

GWRC structured the Proposed Plan in a way intended to ensure integrated management of fresh water, coastal water, land use and development. The whitua process is also using an integrated catchment management model to link land use and development choices with water quality and quantity outcomes.

Stakeholder views

Stakeholders expressed concern that the policies in the Proposed Plan may be too aspirational to implement in a practical sense. They question if GWRC has adequately considered the costs to the ratepayer or its own capacity and capability for monitoring, compliance and enforcement of new rules. Some stakeholders consider that GWRC needs to tackle land use as a higher priority, in order to get positive results in the region.

Iwi and hapū views

Hui participants said their first impression was that representation was skewed towards stakeholders at the expense of iwi, but their current impression is that GWRC really champions issues of cultural importance. GWRC insisted on having a specific iwi values session on Te Mana o te Wai. There is both broad integration of tāngata whenua values throughout other values, as well as a place uniquely for tāngata whenua values to sit. They say that GWRC is quite committed. At the least, there are two iwi support members who attend the working groups.

They would like to see more data gathering to support the assessment of mahinga kai. Currently, there is not enough information for mahinga kai to inform models. There is a concern that the Porirua whaitua will not be able to model mahinga kai by its end-of-year deadline because of an absence of data. This same issue applies to other cultural health indicators.

Hui participants we spoke to said they believe that GWRC will achieve the objectives of the NPS-FM. The shift GWRC has made towards collaboration is a step towards achieving this. Their concern is that the aspect of collaboration increases the amount of time it will take for GWRC to address freshwater issues.

Community engagement

Engagement strategy

GWRC's primary avenue for community engagement is through the whitua committees. GWRC says its goal is for freshwater management to be self contained and community led at the sub-regional scale.

The committees comprise representatives from each iwi and territorial authority in the whitua, elected and appointed members of Te Upoko Taiao, and members of the community. Community representatives were nominated by the community but selected by GWRC to ensure that they are advocates for the community as a whole. GWRC chose people who:

- live in the whitua or otherwise have a strong interest in the area
- are not an advocate or representative of a particular industry or sector group
- show willingness to engage openly and objectively
- represent a range of interests, experience and expertise.

GWRC says that choosing the right people from those nominated to sit on the Whitua Committee is a challenge. For the Ruamāhanga Whitua Committee, 8 people were chosen from among 28 nominations. GWRC says that the lengthy selection process is important because it ensures the most suitable people sit at the whitua table. However, it acknowledges that some of its stakeholders felt aggrieved that industry sectors and interest groups are not formally represented on the committees.

The whitua committees also lead engagement with the wider community through public discussions held throughout the whitua. The community is readily engaged with the whitua programme in places like Porirua, where many community groups are involved in riparian planting and stream health. The harbour is a focal point for freshwater issues. However, GWRC is concerned that the population in the other urban areas is considerably less engaged. They are less aware of issues such as contaminant run-off, sedimentation and faecal pollution.

GWRC says that it takes about six months from the beginning of the whitua process to a point where it is running effectively.

Iwi and hapū views

Hui participants generally support the whitua process and appreciate that GWRC has chosen a more collaborative approach. They have concerns, however, that the long planning process may be delaying practical action to address issues that are happening now.

They said that GWRC is stepping in where necessary to ensure that Māori voices are heard within the whitua process. Hui participants have a concern, however, that the Whitua Committee will reach a majority decision that does not fully support Māori values. However, they acknowledge that collaborative processes mean compromises will need to be made.

Hui participants also expressed concern that the process is demanding on time and resources. It is difficult for them to participate effectively when their time and resources are already stretched across work with multiple government entities. The level at which the science is

communicated can be a barrier to iwi engagement. Their only recommendations for improving the process are that whitua members be given realistic expectations of the commitment that will be expected from them at the beginning, and that the science communication is tailored to a lay audience.

Stakeholder views

Stakeholders say they have been told that the WIP will not be presented to GWRC until there is full consensus within the Whitua Committee. Serving the ideal of collaboration is great, but they think that big decisions may emerge throughout whitua processes where ‘citizens’ cannot be expected to make the hard decisions that must be made.

They think that the whitua process could deliver the objectives and policies of the NPS-FM within the Porirua catchment but are nervous about the Hutt Valley catchment and Wellington Harbour. There is a huge quantity of water within these catchments with unique challenges.

They believe that the whitua process can deliver much of what is required to implement the NPS-FM, but there will always remain a proportion of hard decisions that must be made. They are not confident the Whitua Committee is the most appropriate authority to make those hard choices. They said that not all decisions are necessarily best made by those who are affected by them. Non-specialists should not be making specialist decisions.

They are also concerned that the whitua process will not be agile enough to be applied effectively in other catchments and do not think the whitua chapters will fit neatly into the Proposed Plan.

They said they suspect that GWRC is subconsciously defending what is set out in its Proposed Plan when it engages with the Whitua Committee. They think that the Proposed Plan is subtly informing the direction of the Whitua Committee via GWRC staff involved with the committee.

Engaging with iwi and hapū

Engagement strategy

GWRC engages with iwi primarily through its well-established avenues including the Ara Tahī governance group and Te Upoko Taiao committee. GWRC also has multiple arrangements with individual iwi, respecting their differences. These various means of engagement appear to have been successful over the long term.

GWRC says that science and iwi values are woven together in the Proposed Plan. It intends to have identified those tāngata whenua values that are specific to each of the five whaitua as the specific chapters are added. GWRC believes iwi are satisfied that their interests are embodied within the plans.

Iwi and hapū views

Hui participants we spoke to said that GWRC is doing a relatively good job in terms of iwi engagement. They believe GWRC is one of the better regional councils in this regard. While they believe that most councils merely meet statutory obligations, GWRC works to maintain relationships well beyond the period that they are needed. However, they say that GWRC could be more responsive to iwi concerns at times and that the relationship sometimes feels one way. For example, they say it takes longer for them to get a response from GWRC than the other way around.

Stakeholder views

Stakeholders were generally positive about involvement through the whaitua committees but say that GWRC staff direct how the whaitua meetings progress. For example, they prioritised sessions on iwi values for longer than the Whaitua Committee wanted, despite the fact that iwi values were definitively decided from early on in the process.

Engaging with territorial authorities

GWRC says that it is actively working with territorial authorities and Wellington Water Ltd. They are all involved with water supply, stormwater and wastewater management, and GWRC believes working together has been productive. It is hoped that their projects will resolve many of the challenges that GWRC faces regarding freshwater management.

Wellington Water Ltd is involved at the whitua level and some of its staff are on the whitua project team. They provide information as well as modelling and science expertise but do not take part in decision-making.

The Wellington region is not experiencing much growth or development. Porirua is where most development will occur over the next few years. GWRC says that Wellington Water Ltd understands these opportunities.

Stakeholder views

Stakeholders said that historically there has been limited communication between GWRC and territorial authorities, which hinders NPS-FM implementation and planning overall. They believe that, by collaborating with communities and Wellington Water Ltd, GWRC can achieve the aspirational policies it has set, but GWRC needs to be willing to invite them to the table.

Wastewater in Porirua has become a huge challenge due to non-compliance stemming from an absence of enforcement. Porirua will need a significant financial injection in order to achieve national bottom lines for its waterways because of years of deferred maintenance. Despite this, the conversation has not taken place with the community. It is beginning to emerge in the Porirua whitua. There is wide ignorance within the community about stormwater run-off. They would like to see a national-led education campaign for stormwater.

They are also concerned that the NPS-FM places heavy demand on councils without supplying the funding necessary to implement such changes in the timeframe allocated. For example, infrastructure in Porirua would take 20 to 30 years to upgrade at current rates.

Decision-making

On receiving each WIP, GWRC intends to:

- undertake a plan change of the Proposed Plan, in order to incorporate regulatory recommendations of the WIP. The Proposed Plan contains chapters for each whitua in anticipation of whitua-specific plan changes
- implement non-regulatory recommendations of the WIP, including seeking funding through the next Long Term Plan process
- for any requirements of the NPS-FM that the WIP does not fulfil, and the Whitua Committee is unable to produce recommendations on, develop and notify any necessary changes to the Proposed Plan.

Te Upoko Taiao is the delegated authority for approving any plan changes resulting from whitua committee recommendations, but GWRC has the final sign off.

After this, the Whitua Committee 'de-establishes'. GWRC is thinking about the role of whitua committees beyond the plan change and thinking of community-led freshwater management.

Capacity and capability for freshwater planning

Council

GWRC believes that a collaborative process done properly needs significant resource commitment. Sufficient funding and staff capability are necessary requirements.

GWRC says that it is lucky about its level of resourcing, compared with other regional councils. GWRC considers that most other councils would not have the resources or staff capability to commit to the process it has chosen.

GWRC says that the models it uses to support whaitua decisions are expensive. GWRC says that it is fortunate to have councillors who have bought into the collaborative–whaitua process. Modelling has cost them around \$1 million this planning round. GWRC is competing with other regional councils for the same modellers, it says it is fortunate that it chose to develop the modelling early because in five years' time this competition will likely get more and more extreme.

To support iwi involvement, GWRC offers funding for practical projects and internships and secondments for tāngata whenua to work within the Council and develop capability.

Whaitua committee members

GWRC says that getting adequate community engagement in order to properly implement the NPS-FM is a challenge. GWRC pays an honorarium to whaitua committee members, but the time and resource burdens on volunteers are considerable. Whaitua members have the opportunity to leave the committee if they choose to after two years. Nobody left the Ruamāhanga process, despite the immense pressure placed on them. At the moment, they are meeting every two weeks.

Iwi and hapū

Iwi and hapū say their involvement across the multiple forums for engagement with multiple councils strains their capacity and capability. However, they believe the resource constraints tāngata whenua face are no different from many other interests in the community.

Stakeholders

Stakeholders we spoke to say that they are concerned about GWRC's capacity and capability to deliver its policy.

Information

GWRC operates an extensive monitoring system that measures: river flows and levels continuously at 60 sites, river water quality indicators monthly at 55 sites, groundwater levels at 136 sites, groundwater quality quarterly at 71 sites and lake levels continuously at 6 sites.

Supporting whitua

GWRC says it has made it clear internally that the Whitua Committee is a 'client' who their staff consult to. It encourages the science team to model this approach as well.

To help the community within the whitua, GWRC has set up a collaborative modelling project to consider freshwater outcomes under different management scenarios. Whitua committees use about 8 to 10 model 'architectures' to run these scenarios. These architectures integrate environmental–biophysical models with economic and social models to bring in socio-cultural aspects. Whitua committees come up with the different scenarios themselves. The science team helps them run the scenarios through the different models and ensure the models are able to achieve what the Whitua Committee requires them to do.

GWRC says that whitua committees have limited understanding of the science but they understand cause and effect and community concerns. GWRC says that it is up to its science strategy team to work with whitua committees to ensure the science is communicated and understood.

GWRC says that the degree of modelling required is beyond the capability of its science department. Whitua committees tend to respond better to experts who are contracted in. GWRC scientists are occasionally met with distrust. GWRC considers that externally contracted experts are more defensible from a legal perspective.

Data management

GWRC says that its accounting system for water takes is already quite well developed, but for contaminants it would take a lot of work to manage. It says it can account for sources of contaminants on a catchment level, but it will depend on the freshwater management unit what level of accounting it implements. It may be that a lot of that accounting is achieved through modelling, and the modelling will identify data gaps due to uncertainty.

Stakeholder views

Stakeholders we spoke to said that historically GWRC has not managed its waterways very well. Communities have kept asking for monitoring and compliance that responds to freshwater issues, but this has not always been delivered on. They are concerned that, unless GWRC commits to resourcing monitoring and compliance with its proposed policies then its high aspirations will not be met.

They say there is a knowledge deficit in freshwater biodiversity science, receiving environments and modelling geography. They get the impression that GWRC is beginning to fill this knowledge deficit. GWRC's modelling investment is an 'internal' collaboration within

the Council. They say that GWRC denied their offers to contribute their knowledge, funding and expertise to its modelling.

They say that the whitua process is good in principle but only if the members are properly informed. GWRC needs to improve its communication of science to whitua committees (ie, tell a story to answer the 'so what' question). They are concerned that GWRC is not communicating the cost of investment to the whitua in order to meet the objectives and limits it sets.

Iwi and hapū views

Hui participants we spoke to said that GWRC staff members are insistent that Māori knowledge is incorporated into the whitua process. Nevertheless, they have a strong concern that when mātauranga Māori and science both inform limits, the two sources of knowledge will create conflict when limits are broken or not reached.

They say that there is a lack of Māori-centric indicators for ecological health and mahinga kai, and it would be worth looking into tuna health as an indicator. There is current work in progress managing lakes Kohangapiripiri and Kohanga as tuna fisheries (something that has historically never been done because of their importance to iwi). GWRC has been relatively receptive to matters that Māori hold to be important.

Plan implementation

Implementation strategy

Because the Proposed Plan and whitua-specific rules are under development, it is too early to report on their implementation.

Non-regulatory work programmes

GWRC has several non-regulatory programmes in its long-term plan, including management plans for hill country farms (mainly concerning erosion) that set out guidelines for vegetation planting and fencing. It has employed two new staff specifically to promote farm management plans. It believes it is performing ahead of other councils because its councillors are able and willing to commit funding towards these various programmes.

Conclusions and recommendations

The following are the views of government officials about NPS-FM implementation in the region.

- There is a high level of political support within GWRC for the NPS-FM implementation programme, this is a strength. GWRC has agreed to accept whaitua committee recommendations – we consider this to be an important ingredient of collaboration. We agree with the approach of GWRC in choosing the most challenging area (Ruamāhanga) first for the limit-setting programme.
- Community engagement is highly collaborative and well supported by GWRC staff. There appears to be good community buy-in without advocates being on whaitua committees.
- Care is needed in ensuring wider community and stakeholders are involved and aligned with whaitua progress.
- However, some stakeholders perceive that GWRC staff seem to have predetermined ideas about whaitua outcomes. GWRC may want to address these perceptions if this is not its intention. Stakeholders also say that GWRC needs to improve how it communicates technical information.
- GWRC is generally doing a good job of engaging with iwi, based on feedback from GWRC staff and hui participants we spoke to.
- GWRC is well resourced, compared with some other councils but there are still significant constraints.
- The collaborative modelling project, although resource hungry, is a good development.
- This is a large and complex programme – to have completed implementation by 2022 is ambitious.
- Integrating the Proposed Plan and the whaitua chapters will be a challenge. They will have separate objectives, policies and rules, and it is hard to see how these can all be brought together.
- It seems as though many minimum flows are long standing, and there seemed to be a reluctance to re-litigate these.