

Proposed Natural Resource Plan: Hearing Stream Three

Panel Queries - “Primary Production” and “Research & Monitoring”: FFNZ Response, 8 Sept 2017

Primary Production

The Panel has requested clarification of the extent to which the FFNZ submission provides scope for an expanded definition of primary production, including with reference to Policy P7.

Relevant sections from the FFNZ submission are set out below: new provisions recommended, plus pNRP provisions as notified with FFNZ relief highlighted. In our view, there is clear scope.

Table 1.1 Values of water

Relief Sought: expand each of the values with succinct, region-specific descriptors, for example:

Food and Fibre production: around half of the Wellington region land area produces food and fibre products for domestic and export markets. Dairy, meat and forestry products are dominant, alongside smaller land areas devoted to cropping, horticulture, viticulture and beekeeping. The pNRP establishes a management framework for enabling the growth of the primary production sector within a lower environmental footprint. Water is a critical input: the pNRP recognises the importance of security and reliability of supply for irrigation

New Objective – primary production

Relief Sought: each of the values, including primary production, merits a corresponding objective.

The social, economic, cultural and environmental benefits of primary production, manufacturing and processing activities are recognised and provided for.

New Policy – primary production

Relief Sought: acknowledging swimming is an important beneficial use meriting an additional policy, primary production values are also of sufficient import to merit elaboration

The benefits of primary production, manufacturing, distribution and processing are recognised ...:

P7 - uses of land and water

Relief Sought: The cultural, social environmental and economic benefits of using land and water for *inter alia*: a) aquaculture, f) ~~flood~~ primary production, and harvesting, and processing, g) gravel extraction from rivers for flood protection and control purposes

Research & Monitoring

The Panel has requested clarification of the extent to which FFNZ recommendations for policies and methods which provide for research and monitoring, are linked to objectives.

In our view, RPS and pNRP objectives are generally structured to provide for what is intended to be achieved, while policies and methods set out how the objectives will be achieved, including through investigations, and development and dissemination of information.

The pNRP has been developed alongside the Whaitua process which is intended to give effect to the NPS-FW: in this context, the pNRP includes provisions for research and monitoring activities, including to support upcoming whaitua processes, eg, Method M10 Water Quality Investigations.

In our view, the intent of ongoing active research and monitoring is reasonably explicit through the pNRP – including to support integrated catchment management and adaptive management - albeit more implicit within the objectives.

FFNZ relief seeks that - to the extent that methods are already proposed for research and monitoring activities (eg, M10) to help give effect to higher level objectives - it is appropriate that these methods be linked to objectives through policies.

Within this context above, relevant sections from the pNRP as notified and FFNZ submission are set out below.

1.3 Guiding Principles

Te Upoko Taiao established a set of guiding principles that underpin the overall management of the Plan. These are *inter alia*: **To mātou whakapono** (judgement based on knowledge) – recognition that our actions will be considered and justified by using the **best available information** and good judgement.

1.5.1 Statutory Framework

Relief Sought: add the following, or words to similar effect: “The NPS-FM recognises that engagement with communities and robust, durable solutions can take time. It recognises the importance of quality rather than quick fixes and frameworks... **Longterm monitoring data will be used both to assess current state and to determine progress.** In large catchments **more monitoring sites will be needed to help isolate hotspots and determine causes,** either from legacy or current landuses...”

01 - integrated catchment management

Relief Sought: “land, freshwater bodies and the coast are managed as integrated and connected resources using the catchment as the management unit”

05 - Balancing objectives

Relief Sought: “freshwater bodies and the coastal marine area, ~~as a minimum,~~ are managed to a) safeguard aquatic ecosystem health and mahinga kai; and b) provide for contact recreation and maori customary use; and c) provide for the health needs of people provide an appropriate balance across values and uses in a catchment... The whaitua committee process will consider for each catchment – or sub-catchment – all the values that are relevant to setting objectives, **with a full set**”

of relevant catchment – or sub-catchment – evidence. Improvement efforts will be tailored in accordance with the issues, values and economic constraints of each catchment”.

O25 – aquatic ecosystem health and mahinga kai

Relief Sought: To safeguard indigenous aquatic ecosystem health and mahinga kai in fresh water bodies and coastal marine area by ... d) Indicative priorities for whaitua attention include (named waterbodies)

Aquatic ecosystem health and mahinga kai objectives

Relief Sought: Add explanation as follows or to similar effect: regional objectives for safeguarding indigenous species and mahinga kai start from the basis of current water quality and indicate priorities for whaitua attention where waterbodies are currently below national bottomlines. Whaitua objectives and supporting attributes will be developed in the context of economic, environmental, social and cultural considerations, and with a full set of relevant catchment evidence.

P1 – integrated catchment management

Relief Sought: Land and water will be managed recognising ki uta ki tai by using principles of integrated catchment management, including:

- a) decision-making using the catchment as the spatial unit and prioritising catchments over the short to medium term for coordinated community action
- b) applying an adaptive management approach to take into account the dynamic nature and process of catchments, with appropriate timeframes for monitoring progress and testing management approaches
- c) coordinated catchment management building on the existing river, lake and catchment schemes and coordinating with TAs and industry to support with science, resources and extension services; with decisions based on best available information and robust cost-benefit analysis of catchment options
- d) taking into account the connected nature of resources and natural processes and communities within a catchment
- e) recognising links between environmental, social, cultural and economic sustainability of the catchment

P3 - ~~Precautionary Approach~~ Balancing Values

Relief Sought: ...Use and development shall be managed with a ~~precautionary~~ proactive approach to research and monitoring where there is currently limited information regarding the receiving environment and the adverse effects the activity may have on this environment; within a coherent

integrated framework including risk identification, probability/impact assessment, and cost benefit analysis of options

New policy - Research and Monitoring

Reason: research and monitoring is fundamental to an adaptive management approach and to support arriving at an appropriate balance across values.

Recommendations are made in the methods for research and monitoring in key areas, but these should be framed within an explicit policy intent.

The commitment to expanded research and monitoring for water quality must be matched by a commitment to expanded research and monitoring for water quantity.

Relief Sought: The regional research programme will prioritise:

- a) water quality investigations in priority catchments and waterbodies, as set out in M10
- b) validation and calibration of catchment water balance models, including validation/calibration of sub-catchment and seasonal water balances (priority Ruamahanga)
- c) critical analysis of key data gaps, assumptions and uncertainties in the current conjunctive water framework, including ground-truthing Category A, B, C connections and boundaries
- d) expanded sites for improved measurement and monitoring of minimum flows (eg, more low flow monitoring in the lower Ruamahanga, south of Waihenga)

The regional research programme may be extended on the recommendation of whitua committees to address key areas where there is limited information, including:

- (a) monitoring of indigenous fish populations, including threatened or taonga species to assist in prioritising initiatives to safeguard indigenous species and mahinga kai (eg, kakahi, longfin eels)
- (b) analysis of sources to help identify and prioritise catchment works
- (c) mapping of surface and sub-surface flowpaths and attenuation processes to help identify and prioritise catchment opportunities for interception and mitigation

The regional SOE monitoring network may be extended on the recommendation of whitua committees to include:

- (a) up-catchment sites to help identify and prioritise catchment works
- (b) expanded landowner, iwi and community involvement in using property-scale and catchment-scale tools for understanding and monitoring their own water quality.