

**IN THE MATTER**

of the Resource Management Act 1991

**AND**

**IN THE MATTER**

Proposed Natural Resources Plan

**BETWEEN**

Federated Farmers of NZ

**AND**

Wellington Regional Council

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**Federated Farmers  
Summary Statement for Hearing Stream One**

**25 May 2017**

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## 1.0 INTRODUCTION

- 1.1 Federated Farmers welcome the opportunity to speak to our submission on the proposed Natural Resources Plan (pNRP). Federated Farmers is a voluntary member-based organisation working for profitable and sustainable farm businesses. We represent around half of pastoral and cropping farm businesses in the Wairarapa and wider Wellington-Kapiti region.
- 1.2 My name is Jamie Falloon. I have been President for the Wairarapa-Wellington-Kapiti Province since 2012. With me is Elizabeth McGruddy, Senior Policy Adviser for Federated Farmers. Between us, we have experience in the development of water policy in various other regions and at the national level, including participation in Land and Water Forum working groups.
- 1.3 We have worked on behalf of Federated Farmers in this region throughout the development of the Working Draft for Discussion and the draft NRP through to notification of the pNRP. We have attended meetings convened by WRC; hosted on-farm meetings to discuss certain provisions, eg, stock exclusion; and have presented formal and informal feedback to WRC throughout the process.
- 1.4 Throughout this process, we have kept abreast of scientific and technical work commissioned by WRC, relevant to understanding the particular challenges and opportunities for the Wairarapa and wider region.
- 1.5 Our work is strongly informed by farmer ownership of both the problems and the solutions. In recent years, we have convened two rounds of farmer meetings in local halls through the Wairarapa and in Wellington and Kapiti. We presented farmers with information relevant to understanding water quality in their own local rivers and catchments, and sought feedback and direction on preferred ways of making progress. [Attachment One](#) presents illustrative slides from those farmer meetings.
- 1.6 Throughout this period, we have worked closely with primary sector colleagues, including the dairy, drystock, cropping, horticulture, fertiliser and irrigation sectors. In late 2014, we coordinated a joint “Team Ag” presentation to Te Upuko Taiao, updating on investments and progress being made by each of the sectors, and expressing support for giving practical effect to the partnership ethos informing development of the pNRP. [Attachment Two](#) presents illustrative slides.
- 1.7 More recently, I have been working with WRC, MPI, NZ Landcare Trust and others to explore opportunities for a new way forward centred on catchment communities. [Attachment Three](#) presents illustrative slides from a recent presentation I made to the WRC Environment Committee.
- 1.8 This statement [summarises](#) key themes and relief sought in our submission relevant to Hearing Stream One, but is not intended to replace the more detailed relief sought in our

submission. We include brief comment on matters raised in Councils evidence and s42A reports as it relates to key outcomes sought by Federated Farmers.

- 1.9 In future hearing streams, we intend to call expert evidence (science, legal, planning) in support of our submission. To the extent the Panel directs caucusing on any matters relevant to our submission, we request that Federated Farmers be involved.

## 2.0 OVERALL PLAN

2.1 Federated Farmers support the development of the pNRP, alongside the establishment of local whitua committees. We expect that:

- The pNRP will establish a framework for overall maintenance of current water quality and minimum flow/allocation regimes, while prioritising areas for closer investigation or coordinated action; and
- Whitua committees will agree community objectives for improvement, informed by closer consideration of community values, priorities and costs.

2.2 Consistent with this expectation, we support the approach proposed for contact recreation, ie, that the pNRP indicate priorities for whitua attention. We make recommendations in our submission for adopting the contact recreation template for other values.

2.3 We note some submitters seek that the pNRP include the development of “interim limits”. We oppose these submissions for the reasons set out in our further submission; and support the NPS-FW Implementation Programme as already approved by WRC.

2.4 The WRC s32 Report “Water Quality” (6.2.3) assesses in some detail the proposed pNRP approach vis-à-vis an option of “interim limits”. The report refers to five matters identified by the Land and Water Forum (LAWF 2012) against which consideration of interim limits should be tested, ie:

- *The requirements of national instruments are at risk*
- *The catchment has not already been prioritised for early collaborative limit-setting processes*
- *The current suite of industry, community and council programmes is assessed as insufficient to manage the risk of significant impacts*
- *The resource is under pressure from existing or anticipated use.*

2.5 Against these five criteria, the s32 report determined that:

- *“an interim water quality limit across the wellington region would be an inefficient duplication of a process already underway, and social and economic transition costs would not be appropriate in consideration of the state of water resources and pressures faced”*
- *“The risks of an interim water quality limit framework where there is insufficient information – including of the social and economic impacts of setting an interim limit – is high and one that is not warranted either by the current resource pressure, or by lack of tools to manage water quality in the interim”.*

2.6 Federated Farmers support the position adopted by WRC to reject an “interim limits” regime. We broadly support the pNRP intention (s32 Water Quality, 6.3) that an integrated package of regulatory and non-regulatory approaches will maintain or improve fresh and coastal water efficiently and effectively as:

- *“It ensures water quality in the region is maintained without significant increases in costs to the community or resource users*
- *Council and user resources are focussed on locations where the state and pressures on the resource indicate that the investment of additional effort will provide an improvement in water quality, in an effective and practical manner*
- *The combination of regulatory and non-regulatory methods addresses the complex drivers of water quality impacts from urban and rural landuse activities in a coherent framework”*

2.7 Within this broad framework, the key differences in our position are the relative weight of regulatory and non-regulatory methods: our submission recommends *“pruning the rules and beefing up the partnerships”*.

2.8 Federated Farmers acknowledge the significant investments made by WRC and our industry colleagues to support sustainable rural landuse; and in particular the active resourcing of non-regulatory partnerships in priority catchments. Lowland and hill country farmers in this region have achieved significant improvements in productivity in recent decades: in the context that water quality is generally stable, this is testament to the success of those programmes. Attachment Four is three A3 maps illustrating hill country farm plan coverage, an individual farm plan map, and an individual farm record of environmental investments.

2.9 Federated Farmers supports the ongoing WRC commitment to non-regulatory partnerships, supported by funding in the Longterm Plan. As described in the s32 Water Quality report (pg 48), the pNRP provisions bring together a number of non-regulatory funded programmes covering:

- *Regional industry and community partnership programmes to advance good practice management*
- *Prioritisation of intervention programmes to progressively improve land use management practices at identified locations and in catchments prioritised for improvement*
- *Investigation and development of restoration programmes to address legacy issues where appropriate*

2.9 We generally support the pNRP methods while making recommendations for more strongly prioritised and resourced partnership programmes for:

- Coordination and land management advisory services in priority catchments
- Restoration of sites highly valued for biodiversity and other values, including investment in riparian management and wetlands
- Provision of Land Management advisory services to enable beneficial activities, eg, river crossings; develop agreed practice for contentious areas, eg, drain cleaning; and to extend one-on-one advisory services to willing landowners outside priority catchments
- Increased investment in sub-catchment monitoring to support council and community understanding of catchment pressures and patterns

2.10 The approach in the pNRP is underpinned by Council data on the state of the regions waterbodies. Federated Farmers acknowledge the extensive state of the environment (SOE) monitoring undertaken by Wellington Regional Council (WRC) over the last 20 years. Recent analysis of state and trends confirms that ecological health and water quality across the region are reasonably good and generally stable, while indicating areas where improvements are warranted.

2.11 We welcome the explicit commitment in the methods to increased monitoring and research in water quality “hotspots” to support community understanding, and to inform effective targeting of investments; and broadly support the intended approach as set out in the s32 Water Quality report (pg 27) that:

- *“In implementing O23, O24 and O25 through the policies, methods and rules in the pNRP, improvements will be prioritised across the region giving consideration to factors including the nature of the issues and the severity of impact. Sites and specific activities may require additional regulatory and non-regulatory efforts in order to improve, over time, water quality for contact recreation, maori customary use, aquatic ecosystem health and mahinga kai.*
- *Therefore, the broad framework for water quality in the pNRP is that region-scale water quality will be maintained and some identified localities will be managed to improve water quality, complementing the whaitua processes as they are rolled out across the region”.*

2.12 Within this broad framework, the key differences in our position are the relative weight and specificity of objectives and provisions for maintenance or targeted improvements.

2.13 In summary: Federated Farmers relief sought is intended to ensure that:

- the pNRP respects and provides for an appropriate balance across all values and uses, including primary production
- the pNRP provides an enabling framework for aligning public and private partnership investments to achieve progressive improvements in priority areas.
- the pNRP provides an enabling framework for catchment partnerships to provide for the engagement, innovation and adaptive management needed to sustain enduring improvements.

### **3.0 CONSULTATION**

3.1 We record appreciation of the process WRC followed in consulting on the Working Document for Discussion and the draft NRP before notifying the pNRP.

3.2 We record concern that, in two key areas, significant changes were made which had not been earlier signalled, were not subsequently supported by explicit reasoning in the s32 reports, and both of which may be seen to “pre-empt” whaitua considerations in critical areas.

3.3 The first relates to the water quality outcomes in Objective 25 which were significantly changed between plan iterations. The second relates to water allocations which were significantly changed in the pNRP as notified.

3.5 Acknowledging that these matters will be addressed in future hearing streams, we suggest there may be value in further work in advance of those hearings, for example, provision of up to information on state and trends in the regions waterbodies to support Panel deliberations.

### **4.0 SECTION 32 REPORTS**

4.1 Section 32 analysis is critical to the robust identification of options, costs and benefits before proposing a particular suite of objectives and provisions. In 2014, MfE issued guidance emphasising this point: *“The Resource Management Amendment Act 2013 introduced new requirements. These new requirements encourage quantification of costs and benefits, emphasise the need to assess economic costs and benefits, and generally require a more robust, more clearly articulated analysis that is proportionate to the type of proposal”*. The MfE Guide instructs councils, inter alia, that: *“A well-defined problem forms a strong*

*foundation for an evaluation: the degree of clarity about the problem will influence the type and range of policy solutions considered and the quality of analysis of the options”.*

4.2 It is our submission that the quality of problem statements, consideration of alternatives and cost-benefit analysis of options is less than adequate across critical areas of the pNRP including:

- Identification and interpretation of proposed water quality “outcomes”
- Identification and regulation of “significant sites” and “protection zones”
- Significant farm capital expenditure items, including stock exclusion, pond sealing and storage, impermeable lining for silage storage, 5 metre cultivation setbacks

4.4 We recommend that explicit cost-benefit analysis of pNRP water quality and allocation proposals be undertaken prior to the upcoming hearing streams; alongside alternate proposals - including in the Federated Farmers submission - for maintaining current state and maintaining currently operative water allocations, pending more detailed whaitua consideration.

4.5 It is our submission that the quality of evidence and process followed in preparation of the schedules is inadequate in key areas, including:

- Failure to provide clear criteria and evidence, eg, outstanding water bodies, trout rivers
- The quality of engagement with those affected by specific schedules and associated rules, including failure to advise affected landowners, eg, inanga sites, drinking water zones
- Reliance on high level description and mapping, with plan readers referred to other sites outside the pNRP for finer-resolution data, eg, trout spawning sites
- Failure to provide cost-benefit analysis of the schedules and the sum of their proposed restrictions vis-à-vis alternate options for prioritising significant sites, eg, the relative costs/benefits of Schedule F1 Rivers with significant indigenous biodiversity values vis-à-vis the approach promoted in the WRC Biodiversity Strategy to prioritise high value sites
- Failure to provide cost-benefit analysis of non-regulatory or regulatory methods for giving effect to the values in the schedules, eg, wetlands, mana whenua sites

4.6 The s32 reports accompanying the plan number 20 in total, addressing most of the key values in the plan including maori values, aquatic ecosystems, recreation, natural heritage, historic heritage. One addresses “beneficial use and development” but discussion is mostly confined to infrastructure and energy. It is a notable omission that there is no s32 report for primary production: instead, discussion is scattered throughout, mostly in reference to effects in relation to other values. It is our submission that – not only do we need more explicit cost-benefit analysis of specific items – we also need a s32 report for primary production which analyses the sum of the costs/benefits of the pNRP at both regional and catchment scale.

4.7 Acknowledging the plethora of s32 reports (1000+ pages in total), it is a surprising omission that WRC have not prepared an integrative report, distilling key themes and directions, double-checking consistency of approach across disparate policy areas, and attempting an overall evaluation of the balance arrived at to achieve the over-riding purpose of the RMA. We would have found such a report useful.

## **5.0 SECTION 42A REPORTS**

5.1 Federated Farmers lodged a comprehensive submission.

5.2 Our submission points have been comprehensively rejected.

5.3 We note three exceptions where officers accept our recommended changes:

- The first (1.5.1 Statutory Framework) is to correct an error relating to the NPS-FW, specifically the requirement for whaitua to set objectives, not just limits.
- The second (1.3 Guiding Principles) acknowledges that collaboration is “already in place and can be further built on”.
- The third (M6 plan implementation) agrees that development of guidance for permitted activities should include culverts and river crossing structures

5.4 For the rest – in our view - the reasons for rejecting submission points are mostly cursory. For example: we recommended including a succinct summary of water quality state and trends in the Introduction (1.5.2, Scientific and Technical Information) using information from s32 reports (Water Quality, 2.2) including that:

- *The LAWA data indicates that water quality in freshwater bodies in the Wellington region is in general above average for bacteria, clarity, nitrogen, phosphorous and pH water quality parameters compared to similar waterbodies around the country*
- *Overall water quality has been steady or improving over the past ten years, but some fresh and coastal water systems exhibit degraded ecosystem health, community, cultural or social values.*

5.5 The s42A assessment is that this would “go beyond the style of the text” and be “open to interpretation” (Greenberg, Part B, para 66). We make the point that understanding state and trends is material to a well-defined problem; and that failure to include information to this effect at the front of the plan leaves a vacuum within which various submitters are already presenting contested interpretations.

5.5 Similarly, we recommended that each of the values of water merit a corresponding objective, and accordingly proposed a new objective recognising the social, economic, cultural and environmental benefits of primary production. The S42A assessment (Denton, para 96) is that: “*I do not consider that rural production activities need to be specifically recognised and provided for above other uses of land and water*”. We make the point that rural production comprises well over half of the land area of this region; and that various other uses, eg, recreational uses, have been specifically recognised and provided for in the pNRP.

## 6.0 PLAN STRUCTURE

6.1 Federated Farmers made submissions for changes to the structure of the pNRP, in part to support the council goal that “*the structure and content must be readable, functional and accessible*”.

6.2 **Values:** we suggested that the NPS-FM marks a fundamental shift from the previous “issue” based approach to plan-making to the “value” based approach, and that the simple table of values be expanded to present succinct region-specific descriptors: partly to give due weight and respect to each of the values, and to assist whaitua in arriving at an appropriate balance across values and uses (1.6 Values of Water).

6.3 **Objectives and Policies:** we recommended these be grouped by values, and presented together, partly to assist in highlighting any duplications and gaps (2.1.1 Objectives and 2.1.2 Policies).

**6.4 Methods:** we recommended that methods be located before rules to express the commitment to partnership which is central to the pNRP, building forward from existing successful partnership programmes; and to give better effect to RPS Policy 64, including that: *“Taking a whole of catchment approach is promoted within the RPS. It means considering the full mix of purposes, uses and activities within a catchment in terms of how these interact and contribute to outcomes. This approach suggests a need to work with multiple parties to establish shared objectives for a catchment, and to ensure uses and activities are working towards the same goals. A regulatory approach cannot restore aquatic ecosystems from the effects of many existing and historic activities”*. (2.1.4 Other Methods)

**6.5 Rules:** we suggested that less and better regulation is the order of the day. In the context of overall *maintenance* of current state, Federated Farmers support a clear regulatory framework which prioritises and controls activities with significant adverse effects. In the context of *improvement* or “restoration”, the RPS is clear – and we agree - that non-regulatory methods are preferred. Rules may at best yield grudging compliance, but are unlikely to yield generous engagement. We recommend clear prioritisation of significant activities (significance of either scale or effects) for specific activity-based controls; while enabling a wider range of activities with effects-based conditions attached to permitted activity status (2.1.3 Rules).

6.6 Accepting that rules may *proscribe* certain activities, we are clear that rules are ill-suited to *prescribe* good management practices (GMP). GMP of its nature is context specific, with an expectation of judgement, flexibility and ongoing innovation. Attempts to prescribe GMP in pNRP rules are mostly resulting in conditions which at one extreme, lack certainty; or at the other extreme, result in a high level of micro-management.

6.7 We acknowledge and support WRC efforts to structure many rules as permitted activities. Having said that, too many rules ricochet from permitted to discretionary. It is our strong submission that this is at best an inefficient approach, likely to drive significant increases in transaction costs, and significantly at odds with the WRC intent to make policy in the pNRP, not in the rules.

6.8 In the context of enabling catchment communities – including enabling “green” catchment infrastructure – we recommend the pNRP provide for applicants jointly seeking global consents for activities.

**6.9 Whaitua chapters:** to support whaitua discussions and to assist readability for the community, we recommend that proposed minimum flows and water allocation limits; water quality outcomes and priorities for indigenous species and contact recreation; and schedules of significant sites are located in the whaitua chapters (1.4 integrated catchment management, 2.1.5 whaitua chapters, 2.1.6 schedules/maps).

## **7.0 PNRP INTRODUCTION**

7.1 Federated Farmers made recommendations for expanded introductory text, including the statutory framework, the proposed pNRP approach and region-specific information on state and trends and existing council and industry programmes. It is our strong submission that this context is an essential foundation for the substantive plan chapters. We summarise key element of our recommended relief below.

7.2 We support the context set out in 1.0, including that:

- *Many people living and working in the region have made individual and collective efforts to protect and enhance the natural resources with the region*
- *A comprehensive and integrated approach to natural resource management can be achieved by working collaboratively and using both regulatory and non-regulatory methods underpinned by scientific evidence*
- *Recognising there are several distinct catchment areas within the region, the plan provides for a decentralised approach to establishing priorities and programmes within each of these catchments through the whaitua committees*

7.2 We recommend additional region-specific context - in the spirit that it is important to describe/quantify individual and collective efforts and progress made before identifying areas for further investment or improvement – to the following effect:

- *Around half of the land and waterways in the region are in the ownership and stewardship of the farming community. In total, around 1000 farms: 200 dairy; 100 cropping; 250 horticulture; 250 sheep and beef farms >500ha, the balance <500ha. Each of these farming sectors is well-supported by industry: levy investments in R&D and extension programmes and a network of industry staff working on the ground with farmers and growers.*
- *Alongside industry, the WRC Land Management Team has been working with hill country farmers targetting erosion hotspots for decades. On the strength of the success of that programme, the one-on-one partnership approach was more recently extended to lowland priority catchments.*
- *Most farms have farm plans - as at 2014: Wairarapa hill country: 800 odd farms, 500 farm plans covering 75% of erosion prone land; Wairarapa valley: 200 odd farms, 70+ farm plans*
- *In the period since 1990, primary sector productivity has significantly increased, eg, sheep and beef kg product/ha up nearly 60%; cow numbers doubled, milk solids trebled, water allocation quadrupled*
- *Alongside this growth, farmers have made significant environmental investments, eg, over the last 20 years, 20,000 poles have been planted year on year in the hill country; within the last few years, 600km/95% of Dairy Accord waterways have been fenced*
- *Through this period, water quality indices have remained stable: groundwater quality is generally very good; overall river water quality is reasonably good; and the majority of SOE sites exhibit relatively stable water quality and ecological health*

7.2 **Guiding Principles:** Federated Farmers support the guiding principles set out in 1.3, ie,

- *Te Upoko Taiao intend that the plan will be achievable, practical and affordable for the region*
- *“Mahitahi (partnership) – partnership between WRC, iwi and the community, based on a commitment to active engagement, good faith and a commonality of purpose*
- *“Ongoing collaboration between regulators, resource users, iwi, government and the wider community will be required to manage the region’s natural and cultural resources effectively.*

7.2 These principles are consistent with the Regional Policy Statement (2.4): *“Natural and physical resources are better managed when the social, economic and cultural factors that surround and drive their use and protection is taken into account. Decisions about the management of resources are more effective and lasting if they reflect choices made by the community in terms of what it is best or most able to do”.*

7.3 **Statutory Framework:** Federated Farmers support the intent set out in 1.5.1 to: *“progressively implement the requirements of the NPS-FM by 2025. The key feature of this programme is the catchment-*

*based collaborative community approach – the whitua process. Whitua committees will work with their catchment communities to develop recommendations for objectives and limits.*

7.4 We recommended expanded text derived from the MfE NPS-FW Implementation Guide, and reiterate that recommendation, not least in the context of evidence presented at the hearing (Greenberg, day one) to the effect that whitua may only be developing policies and rules:

- *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.*
- *Objectives will be developed in the context of economic, environmental, social and cultural considerations. Objective setting will be an iterative process: final decisions about objectives will be fully informed by an understanding of their costs and achievability.*
- *The NPS-FM provides flexibility in terms of which methods can be adopted. A mix of approaches – regulatory and non-regulatory – will be tailored to individual catchments and targetted to local issues, interests and parties.*

**7.5 Community Views, Scientific and Technical Information:** the pNRP relies on a range of methods to identify issues and inform approaches to management, but section 1.5.2 simply refers readers to the s32 reports for how the objectives and other provisions address these considerations. We recommend that key themes expressed in community consultation and developed in plan provisions be summarised in the introduction, including that:

- *The RMA was generally seen by participants in the public engagement process as an involved and expensive process that over-regulated natural resources.*
- *Public and iwi participants emphasised the need for an integrated catchment approach to natural resource management which involved collaboration with all resource users.*
- *The aim of the pNRP is to maintain current water quality except for identified locations where water quality will be improved through specific programmes.*
- *An expanded non-regulatory approach forms the core of the catchment-specific provisions for managing agricultural landuse.*
- *The pNRP provides a clear framework for prioritisation of investment in land management actions and infrastructure planning, that will achieve an improvement in water quality in priority catchments where the state and pressure on values most warrant it.*

## 8.0 OBJECTIVES

8.1 Federated Farmers have recommended amendments to O5 and proposed new objectives to provide for all the values and uses of water – including primary production - to be appropriately recognised, consistent with RPS Objective 12: *“the quantity and quality of freshwater meet the range of uses and values for which water is required”*.

8.2 We note that Council evidence at the hearing is to the effect that *“objectives should be read together”* and that *“there is not a hierarchy of objectives”*. We support this position in the context that all values merit respect and recognition, and that the task of further providing for an appropriate balance of values and uses across a catchment – including where and when and to what level values are expressed - will be developed in the whaitua.

8.3 We note concern from the Panel that objectives should *“add value”* rather than simply repeat higher order documents; and that objectives should have a degree of specificity. We agree, and we have made recommendations for amendments to objectives to provide for more specificity (including O1, O6, O7, O8).

8.4 We support the structure of O24 Contact Recreation which presents both narrative and numeric measures, and which establishes a framework of maintenance within the PNRP, while identifying priorities for improvement for whaitua attention.

8.5 We have recommended that other objectives be amended to similar effect, eg, O9 recreation O10 Public Access, O26 Mahinga Kai. Our intent is that these *“generic”* objectives for enhancement would be improved by identifying priority areas for improvement within the objective.

8.6 To the extent that many or most objectives aspire to *“enhancement”* or *“restoration”*, it is our strong submission - consistent with RPS 2.4 and Policy 64 – that these compel a non-regulatory approach in partnership with landowners and the community and we have recommended amendments to this effect (eg, O9, O10).

## 9.0 POLICIES

9.1 We have made recommendations for more specificity in policies, eg, in respect of P1 integrated catchment management:

- *decision-making using the catchment as the spatial unit and prioritising catchments over the short to medium term for coordinated community action*
- *coordinated catchment management building forward from the existing river, lake and catchment schemes and coordinating with TAs and industry to support with science, resources and extension services*

9.2 We recommend amendments to P3 Precautionary Approach to provide for a pro-active approach where there is currently limited information; aligned to recommendations for a new policy – Research and Monitoring.

9.3 We recommend amendments to P4 – Minimising Adverse Effects, to give better effect to the integrated catchment management theme, and to provide for consideration of effects linked to community values and objectives agreed through the whitua processes, including that:

- *Where ~~minimisation~~ management of adverse effects is required by policies in the plan, ~~minimisation~~ management means progressively reducing adverse effects to the smallest amount practicable support achievement of pNRP and WIP objectives and shall include consideration of... strategies for priority catchments to support prioritising effective and cost-effective interventions.*

9.4 Alongside methods and rules, consents, compliance and enforcement activities are a key element in the WRC framework for delivering on sustainable management. We recommend a new policy – Consents, Compliance and Enforcement, including that:

- *WRC Compliance programmes will be prioritised to identified risk areas and to support early corrective actions, and will minimise duplication of industry led programmes*

## 10.0 METHODS

10.1 We record our support of the non-regulatory programmes delivered by the WRC Land Management team in partnership with landowners and industry.

10.2 We support prioritising and naming catchments for coordinated research and action, eg, M10

10.3 We recommend amendments for more specificity to M12: Sustainable Land Management, including that WRC will encourage sustainable rural land management by:

- *promoting good management practices and innovation developed in partnership with landowners and rural industries*
- *developing catchment plans for coordinating or supporting catchment activities and catchment-scale mitigations and innovations, and assisting with the implementation of riparian management plans, critical source area management plans, farm plans and farm environment plans across a number of priority catchments*
- *providing assistance to willing landowners outside the designated priorities*
- *collecting and providing biophysical information in collaboration with catchment landowners needed for prioritising effective and cost-effective catchment action plans and adaptive management*

## 10.0 BENEFICIAL USE AND DEVELOPMENT

10.1 We recommend amendments to provide for P8 – Beneficial Activities to be enabled, not just recognised; and to add other activities as least as beneficial as public artworks, including:

- returning nutrients to the land including effluent, manure, bedding and compost
- maintenance and development of farm tracks for the safe and efficient movement of people and stock
- clearance of manuka/kanuka for the establishment of hive sites and access to them
- enhancement of natural wetlands or construction of new wetlands to support nutrient and sediment attenuation, including regular cleaning and harvest of plant material to support ongoing function

10.2 We recommend new policies to give effect to primary production values and objectives, including a **New Policy – Primary Production**, including provision for

- any requirements for significant new capital investments to be made only in the context of robust cost-benefit analysis
- transition times to meet new requirements or catchment limits
- working alongside industry and landowner/catchment groups to support the ongoing development of sustainable farming systems, and to enable collective or cross-catchment solutions to meet objectives

10.3 We recommend a **New Policy – Irrigation**, including provision for

- Recognising existing uses, and existing capital investments in water takes, pumping, storage, reticulation and application systems
- Providing for investment certainty with consent durations of at least 25 years
- Providing for reliability of supply in determining minimum flow and allocation regimes
- Working alongside industry and water user groups to promote water efficiency technologies, and to enable water sharing and temporary transfers between catchment users

10.4 We recommend a **New Policy - Drainage Infrastructure**, respecting requirements of other legislation and providing that:

- The use and maintenance of drainage systems to provide the required outfall and water table levels for agricultural productivity and to protect from flooding are beneficial and shall generally be enabled.

## 11.0 MAORI VALUES AND MANA WHENUA SITES

11.1 Federated Farmers support the fuller expression of maori values in the pNRP.

11.2 We welcome evidence presented at the hearing in respect of pre-hearing meetings, eg Kourarau Dam, demonstrating the value of on-the-ground meetings to understand others values, develop options, and agree plans for sharing the responsibilities of site improvements respecting mana whenua, landowner and other stakeholder values. Federated Farmers strongly supports this non-regulatory partnership approach for mana whenua sites.

11.2 We recommend amendments to definitions to provide more specificity and clarity, including:

- **Cultural impact assessment:** describing the site-specific effects of activities on site-specific values and options for arriving at an appropriate balance of values and uses

11.3 We recommend amendments to **O16 – Nga taonga nui a kiwa**, consistent with intent expressed in WRC reports (s32 Maori Values, 7.6):

- the relationship of mana whenua with nga taonga nui a kiwa is recognised and provided for by identifying the most significant waterbodies and the most significant relationships in schedule B to assist whaitua by reflecting iwi values in decision-making, and to support prioritising these sites for actions to restore their status

11.4 We recommend amendments to **O26 – Mahinga kai**, which is currently expressed in generic terms. We propose more specific wording to the effect:

- Restoration of indigenous aquatic ecosystem health and mahinga kai is encouraged in high value systems prioritised for active management
- Indicative priorities for whaitua attention include Wairarapa Moana, Porirua Harbour...

11.4 We recommend amendments to **O33 – Mana Whenua Values**, to give better effect to the intent to foster positive partnerships.

- The values of Sites with significant mana whenua values identified in Schedule C are ~~protected~~ managed to respect the values while respecting landowner use and enjoyment of their land and or restored in partnership with landowners and community.

11.5 We recommend similar amendments to **P20 – exercise of kaitiakitanga**, again to give better effect to the intent to enable positive partnerships:

- Kaitiakitanga shall be recognised and provided for by (inter alia) working with landowners in sites with significant mana whenua values listed in Schedule C to identify opportunities to respect mana whenua values in accordance with tikanga and kaupapa Māori as exercised by mana whenua, alongside respecting landowners use and enjoyment of their land

11.6 We seek similar amendments to **P44: Protection and restoration of sites with significant mana whenua values**; and recommend deletion of **P45: Managing adverse effects on sites with significant mana whenua values**

11.7 We recommend amendments to **Schedule C: Sites with significant mana whenua values**.

The supporting s32 report clarifies that the intent to provide positive recognition of iwi values does not over-ride the primary purpose of the RMA. The critical point is developing an enabling framework in the pNRP for supporting understanding and positive recognition of both landowner rights to use and enjoyment of their land, alongside respecting sites of particular significance for iwi.

11.8 A key step is identification. The reports identifying mana whenua sites indicate that - in at least some cases - where landowners are aware of particular sites, efforts are made to respect and protect them; and that these efforts are appreciated by mana whenua.

11.6 The specific identification of sites in the pNRP is intended in part to provide certainty for landowners. As noted in the s32 report: *“this should contribute to a no-surprise culture. The provision of detailed information to plan users is also intended to reduce costs to applicants by reducing the requirement for, and complexity of, cultural impact assessments”*. We support this intent.

11.7 We note that the process of determining sites of significance included description of site specific values, and assessment of site specific threats and pressures.

11.8 As currently presented however, Schedule C does not provide this detailed information, or describe direct threats. Instead the pNRP relies on designating a wide range of activities as “discretionary” if located in a Schedule C site. There is no analysis of the extent to which the values of specific sites will be adversely affected by the activities captured in those rules. WRC propose instead that that analysis will be conducted case-by-case within a discretionary consent application.

11.9 The net effect of the pNRP provisions is that the relationship between iwi and landowners would be arms-length through the consent process. The commitment to *“relationship building”* and indeed *“adding to mana whenua knowledge”* will be paid for by landowners. This proposition is significantly at odds with the broader intent to foster positive partnerships.

11.10 It is our strong submission that the process of arriving at an appropriate balance between iwi and other values must be undertaken firstly in the plan itself, rather than in a discretionary consent process. To the extent activities require consent, matters for control or discretion should be clearly described with reference to more clearly articulated pNRP policies and schedules, not least to support the intent to provide a *“no surprise”* culture.

11.11 We recommend amendment of schedule C to include additional columns describing site specific threats and pressures impacting on values; and proposed site specific restrictions (eg, culverts, fords, bridges or other activities).

11.12 We conclude by reiterating our support for active on-the-ground partnerships between mana whenua, landowners and other stakeholders, actively supported and resourced by WRC.



## Wairarapa Farming HAS Grown the economy

**Dairy**  
Wairarapa cow numbers 2x,  
Milk solids 3x,  
Irrigation allocation 4x since 1990

**Sheep & Beef**  
production/ha up 67%,  
nutrient efficiency up,  
N footprint stable, greenhouse gases stable

**So what's the effect on Water Quality?**

## What is our water quality? - regional overview



**Groundwater Quality – State and Trends, 2005-2010**  
generally very good

**River and Stream Water Quality – State and Trends, 2004-2011**  
reasonably good, and relatively stable

**Lake Water Quality – State and Trends, 2005-2010**  
stable but under NOF bottomline for P

## Ruamahanga Macro-Invertebrates



MCI National G/lines	Ruamahunga Mainstem	Western Tribs	Valley Streams	Eastern Tribs
> 120	McLays 146	Waiohine/gorge 139 Beef Creek 133 Wairongomai 125		
> 100	Te Ore Ore 110 Gladstone 103 Pukio 102	Tauherenikau 118 Waiohine/Bicknells 116 Waingawa 113 Waipoua 104	Parkvale/Lowes 101	
> 80		Mangatarere /SH2 97		Huangaaru 95 Kopuaranga 95 Taueru 90
< 80			Parkvale (Weir) 76	Whangaehu 77

## Ruamahanga Chlorophyll (algae)



Chlorophyll NOF Bands Medians	Ruamahunga Mainstem	Western Tribs	Valley Streams	Eastern Tribs
< 50		Tauherenik/Websters 8 Waingawa/South Rd 20 Waipoua/Colombo 38 Waiohine/Bicknells 35	Parkvale (Lowes) 30	
< 120	Te Ore Ore 51 Gladstone 57 Pukio 54	Mangatarere /SH2 76		
< 200				Huangaaru 166
>200			Parkvale (Weir) 221	Taueru 515 Kopuaranga 518 Whangaehu ?

## Secondary Contact Recreation



E. Coli NOF Bands Medians	Ruamahunga Mainstem	Western Tribs	Valley Streams	Eastern Tribs
< 260	Te Ore Ore 100 Gladstone 82 Pukio 160	Tauherenik/Websters 20 Waingawa/South Rd 22 Waipoua/Colombo 41 Waiohine/Bicknells 68 Mangatarere /SH2 120		Huangarua 4 Taueru 100
< 540				Kopuaranga 315 Whangaehu 375
< 1000			Parkvale/Weir 570	
> 1000				

## Swimming



NOF Bands 95 <sup>th</sup> %	Dry Flows	All Flows
A Band	Ruamahanga/all sites Waipoua/Colombo Waingawa/Kaituna, South Rd Waiohine/Gorge, SH2 Tauherenikau/Websters	Ruamahanga/Double Bridges Waingawa/Kaituna Waiohine/Gorge, SH2
B Band		Waingawa/ South Rd Tauherenikau/Websters
Below B/line		Ruamahanga/Te Ore Ore, Cliffs, Kokotau, Morrisons Bush, Waihenga Waipoua/Colombo

## Ruamahanga Groundwater Nitrate - drinking water standard



SOE Bores x 48 GWRC Bands	Masterton x 10	Carterton x 13	S Wairarapa x 25	Number %
Minimal Impact <3mg/L	7	8	21	37 (75%)
Elevated 3-7mg/L	1	4	3	8 (16%)
Highly Elevated 7-11.3mg/L	Te Ore Ore 9m 10mg 54m 11mg	Taratahi 10m 9mg	Mart Golf Course 32m 9mg	4 (8%)
Fail Drinking >11.3mg/L	0	0	0	



## Ruamahanga River Nitrate



Nitrate NOF Bands Median/95%	Ruamahunga Mainstem	Western Tribs	Valley Streams	Eastern Tribs
A <1.0/1.5	Te Ore Ore 0.3/0.8  Pukio 0.3/0.8	Tauherenikau 0.02 Waingawa 0.05 Waiohine 0.2		Huanga 0.2 Taueru 0.6 Whangaehu 0.8 Kopuaranga 0.9
B <2.4/3.5		Waipoua/Colombo 0.7/1.9 Mangatarere 1.2/?	Parkvale/weir 1.1/3.5	
C <6.9/9.8			Parkvale/Lowes 4.4/6.7	
D >6.9/9.8				



# Hotspots



- P hotspot – Mangatarere @ SH2, DRP 0.7 mg/L
  - “dairy farming catchment”
  - up-catchment analysis: 70% of DRP load CDC sewage
- N hotspot – Parkvale Stream, DIN 4 mg/L
  - “dairy farming catchment”
  - historic data: massive N loadings ex-freezing works
- Periphyton hotspot – Kopuaranga River
  - NOF bottomline, chlorophyll 200 mg/m<sup>2</sup>
  - 18, 203, 195, 173, **1220**, **689**, **515**, 350, 100, 312

## N hotspot: Taratahi/Parkvale



# Team Ag



## Agenda



- Introducing Team Ag
- Wairarapa water – quality, quantity
- New process, partnerships, shared values
- Primary production values, sector presentations
- Draft plan
- Going forward



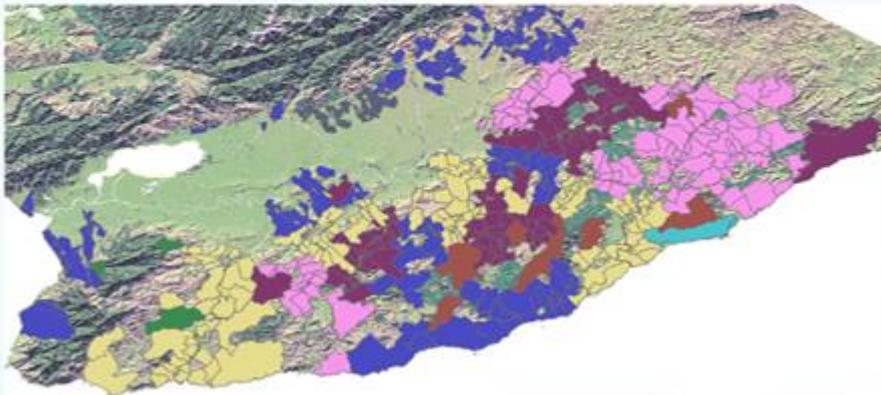
## Valuing Primary Production



- Shift from WDFD to draft (was 40 nil!)
- Not about economy vs environment
  - we're here for both
  - it's about finding the working balance
- All the sectors are investing in this space
  - the presentations give a snapshot

## Farm Plans

- hills 800 farms: 500 plans
- valley 200: Waimoana 40, Mangatarere 30



greater WELLINGTON  
RANGIMATUA | KAWAIHORI  
Te Hāroa | Māori Kaitiaki

GW Environment Committee  
Catchment Communities - A new way forward



**What Are They?**

- Organised facilitated and funded groups of people who identify with a catchment
- Focus on Water Quality, Biodiversity, Pest Management and Climate Change
- Use Science, Monitoring and Experience to deliver results
- No current examples but close are Mangaterere, Wairarapa Moana and Project Aorangi

GW Environment Committee  
Catchment Communities - A new way forward



**What will they achieve?**

- Create an integrated catchment focus rather than 1 on 1
- Allow council to focus on advice, science and research to deliver good practice
- Include Iwi, eNGO's, Primary Industry and community involvement
- Bring a community ecosystems focus which allows balancing of values
- Build Trust and Knowledge - cause and effect
- Test cost benefits
- Move the burden of responsibility to the CC rather than council

GW Environment Committee  
Catchment Communities - A new way forward



**Why are they needed?**

- Regional Planning Process is clunky, costly and compliance driven
- Average 8 years to final decision for 10 year plan
- Minimal Plan focus on implementation – huge risk to Council
- Stifles innovation and adaptive planning
- Closes the loop from NPS to NRP to GMP
- **GW has a choice** – consents compliance and consultants or Catchment communities