

TABLED DOCUMENT

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Dear Nick

Freshwater Consultation 2016

Thank you for the opportunity to provide comments on the Next Steps for Freshwater Consultation Document.

As a local authority with a comparatively small, rurally focussed population, the Rangitikei District Council and its residents are acutely aware of the current pressures around freshwater resources, and the potential for economic, cultural and environmental consequences if freshwater resources are not managed appropriately.

We agree with the introduction that states:

"This pressure on our freshwater resources is becoming increasingly evident:

- *water quality has been declining*
- *water is over-allocated in some places*
- *decision-making can be litigious, resource-consuming, and create uncertainty*
- *we have lacked robust information on the impacts and outcomes of management decisions*
- *water is not always used or available for its highest value use*
- *iwi, hapū and whānau interests and values are not adequately considered in planning and resource management decision-making."*

We wish to reiterate the key points drawn in the paragraph of the consultation document entitled "Supporting Implementation" (page 10), in that, for the proposals to result in successful outcomes :

- regional Councils need to work collaboratively with their communities (inclusive of District Councils) and iwi to determine environmental aspirations for waterways and allocate water for economic use;
- all parties involved in freshwater management and use need to be realistic about the time frames in which meaningful change can be brought about;
- it needs to be acknowledged that the impacts of water reform on users and communities will be far reaching, and therefore that change needs to be brought about in a measured manner; and
- care needs to be taken so that costs and impacts are spread equitably across sectors and generations.

Water Quality and Decision Making

With respect to the decline in water quality we support the use of the Macroinvertebrate ('MAC') Community Index to measure water quality and the removal of stock from waterways. We consider the catchment-based freshwater management units will bring a more targeted approach to water management within a region, allowing communities to consider (and realise) their priorities in terms of clean-up and ongoing management. Using this Index means other approaches are not needed. We consider that the current standard of any freshwater body should be the baseline, and no further deterioration allowed.

The consultation document addresses 'significant infrastructure'. We suggest that there is a broader issue in terms of relative scale. In the Rangitikei District we are working with small village communities (such as Mangaweka and Koitiata) to provide Council managed wastewater treatment systems that provide enhanced treatment over and above conventional septic tanks. The aim of these systems is to reduce the risks associated with older septic tanks that are failing and affecting groundwater quality.

However, there are likely to be challenges for the re-consenting of these small Council-managed wastewater systems, regardless of the MAC Index reports showing less than minor effects, because of the increasing pressure for wholly land-based discharge. The risk is that such schemes become too expensive and are not proceeded with, leaving uncertain the environmental impacts of solutions implemented by individual property owners.

We suggest consideration of freshwater funding for these types of projects where the cost of a wholly land-based discharge is demonstrably unaffordable for the village community it would serve.

Stock exclusion from water bodies

We agree with the proposal that dairy cattle on milking platforms and intensively farmed pigs should be excluded from water bodies by 1 July 2017. However, the very long timeframes for other cattle imply a low impact: the consultation paper does not explain why the Ministry has reached this conclusion, other than to give farmers time to comply.

We disagree with the exclusion of cattle on steeper country. The impact on water bodies will not be different, but the consultation paper takes the view that the environmental benefits are

outweighed by the practicality of fencing. We think this warrants further consideration, including the availability of a fencing subsidy based on the differential cost of fencing hill country compared with that incurred on lowland farms. A parallel instance is evident from the Horizons Regional Council Sustainable Land Use Initiative: a concerted effort has been made to assist hill country farmers to reduce the risk of erosion, with consequential benefit to the region's river systems not silting up.

We agree with the proposal to provide for infringement penalties. These should be scaled to deter repeated offending.

Economic use of fresh water

We support the intent to move away from the 'first in, first served' basis for allocation. However, alongside considering how New Zealand is to increase productivity in the way natural resources are used (page 22) we think that should be a clearly understood (and protected) hierarchy of importance. From our perspective, the first priority is to supply safe (and thus appropriately treated) drinking water to our urban residents and to warn rural residents of the risks associated with drinking untreated rainwater or bore water. However, there is a wider issue. The 'public benefit' from the country's freshwater bodies needs clearer articulation and agreement. Recreational use of rivers – such as swimming, rafting or fishing – needs an adequate flow. Water for public swimming pools or for irrigating public parks and gardens needs to be accorded priority before determining allocations for agriculture and industry.

While not an issue for Rangitikei, we are aware that in other districts some potable water supply bores are located in areas where there is a heavy demand for irrigation. That has meant a need to drill more bores to extract from deeper aquifers to reduce the risk of salt water intrusion from over-extraction in coastal areas. Such situations need to be guarded against.

Water is used throughout food production from irrigation through to processing of meat and vegetables ready for market. Within the Rangitikei there are high demands from food processing and manufacturing industries for our potable water. We also manage several rural water supply schemes where water is provided for stock drinking. The Council is currently working with the Ministry for Primary Industries to increase the effectiveness of these schemes. So the Rangitikei District Council supports the prospect of further policy work in this matter.

However, we suggest early attention to achieving a national standard for documenting groundwater resources and monitoring the effects of abstraction from these. This is where the greatest risk of over allocation occurs, simply because the effects are not immediately apparent where abstraction occurs. Given that the proposed Freshwater Improvement Fund has a focus on projects that deliver clear environmental benefits, we suggest that a portion of this Fund is set aside for this work on groundwater resources without a requirement for co-funding from regional councils.

Iwi, Hapū and Whānau Interests and Values

We support the application of Te Mana o te Wai in our District. Rangitikei is fortunate in having both a long-established standing Iwi Advisory Committee and that there is already Iwi engagement in projects on the Rangitikei River, the Hautapu River and the Tutaenui Stream. However, for those Iwi and Hapū who are still in the Treaty claim process, significant engagement in freshwater issues may be unrealistic for the next few years. We appreciate

recognition of this in the consultation paper and the proposal that the Ministry will facilitate and resource programmes to build capacity and capability. We think it is possible that across our District some Iwi may prefer the Council to initiate an agreement while others may wish to make that invitation. We support having that flexibility.

The Council hopes these comments are helpful.

Yours sincerely

Andy Watson
Mayor of the Rangitīkei District

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