



**ADVISORY COMMITTEE
for the Waikato
REGIONAL ENVIRONMENT**

Thank you for the opportunity to present to you today.

I appear on behalf of the Advisory Committee on the Regional Environment (ACRE). This presentation supplements our submission 1, which identifies specific changes sought in particular sections of the plan. Rather than simply reiterating our original submission or the hearing presentation we made in Block 1, we will talk about what we see as some of the important issues particularly in relation to the Farm Environmental plans.

I am Anna Casey-Cox, Chair of ACRE, and with me is Shepherd Isaac. Shepherd is the newest of ACRE's members and has been involved with restoration work for nearly a decade. Shepherd will introduce ACRE.

ACRE is a Waikato Regional Council advisory committee whose purpose is to act as an environmental advocate by promoting the protection, preservation, conservation and enhancement of the natural values and character of the Waikato Region. It carries out this role by networking and promoting conservation and good environmental practices in the region, acting as a forum for ideas and concerns on environmental matters, making recommendations on any environmental matters that need extra investigation and research, advising the Regional Council on environmental policy and alerting it of environmental matters in need of attention and liaising with groups sharing similar aims.

Members of ACRE come from a variety of backgrounds including farming, horticulture, environmental conservation and restoration, farm forestry, and reserves management among many others. Collectively we are involved in some sixty community environment groups. Such groups help create a context in which environmental matters are seen as a collective responsibility, and can help set the context in which water quality measures undertaken at a sub-catchment level are seen as both acceptable and desirable.

Over the past two decades, the Waikato community has consistently identified water quality as the top issue for our region. As the Regional Council notes, Healthy Rivers/Wai Ora: Proposed Waikato Regional Plan Change 1 is our opportunity to protect the environment and ensure that what we value as a community is here for future generations.

Developed alongside iwi and key stakeholders, the proposed plan change is one of the largest plan changes of its kind in New Zealand, applying to approximately

10,000 properties and covering a land area of 1.1M hectares within the Waikato and Waipā river catchments.

The proposed plan seeks to reduce the amount of contaminants entering into the Waikato and Waipā catchments to achieve the Vision and Strategy/Te Ture Whaimana o Te Awa o Waikato of making the river swimmable and viable for food collection along the entire length of the river. The Vision and Strategy was adopted by the Government as part of Treaty Settlement legislation.

We recognise the considerable work and expertise of the Community Stakeholders Group and the Technical Leaders Group who deliberated and debated much of what this hearing process is doing now. In particular we would like to remember and acknowledge Dr John Quinn and all his contributions to this work.

The CSG determined that as there are a large number of landowners within the catchments who will require significant support and advice from a number of industries, professional and Council advisors to implement Plan Change 1, implementation must be staged. It was therefore identified that those sub-catchments with the greater gap between the desired water quality states and the current states pose the highest risk to achieving the 80 year water quality targets and action must be taken soonest to reduce the four contaminants entering those sub-catchments. We agree with this approach and agree with the officers that staging is necessary, and that priority has been determined through a robust and appropriate method.

We note that the majority of submissions are in opposition to the level of control sought by Plan Change 1. ACRE is not one of these. ACRE believes the proposed Plan Change is WRC's most important current initiative.

We accept that the Plan Change is not perfect, particularly in this first iteration, but in our view the urgency to make a start outweighs the areas of difficulty. The risk is that concerns about the impact of the plan change and criticism of some of its detail will lead to lengthy delay in it becoming operative or else to dilution of its provisions to the extent that it will fall well short of reaching its goals. We suggest a two-fold approach to address this risk: first, fine-tuning to the plan itself; second, a continued effort to explain and interpret the plan to those directly affected by it, emphasising the pressing need for and long term benefits of the practices mandated by the Plan Change. We also emphasise that Plan Change 1 is only the first step and will not in itself achieve the long term targets for the Waikato. An important next step is to mandate and facilitate sub-catchment level analysis and water quality management, and we will talk about this further.

We understand that this block of hearings is partially focused on Farm Environmental Plans. We consider these to be a vital component of the implementation of plan

change 1. As the Section 42A report notes, Farm Environmental Plans have been identified by farming sector organisations, as well as other regional councils and research institutes, as an available and effective tool to help quantify improvements in farming practice.

The Collaborative Stakeholder Group (CSG) chose a framework that would provide relatively specific and directive guidance for FEPs, ensuring they are based on a farm specific risk assessment in terms of contaminant discharges, and contain clear mitigation actions and timeframes. We agree with the officers in their determination that FEPs should continue to be a key part of PC1, and in fact be strengthened. We agree with changes to policy 2 that will provide clarity that auditing of FEPs and on-the-farm actions will be required.

ACRE supports the use of Overseer and the Regional Councils assessment of its use or applicability to Plan Change 1. We understand that Overseer modelling can tell us with a reasonable degree of assurance that a particular change in farm management may increase or decrease nitrogen leaching (over time) from that farm, and by how much.

PC1's primary use of the Nitrogen Reference Point and the Overseer model is as decision support for development of the Farm Environmental Plans. We appreciate that Overseer can provide some quantitative data to inform farm management. Without this, we are concerned that Farm Environmental Plans would be largely qualitative. We think both quantitative and qualitative measures will enable the best understandings and therefore inform the best actions. We agree that Waikato Regional Council should continue to develop work-arounds and proxies that enable Overseer to more accurately model animal types and crops not directly accounted for in the model, where there is sufficient scientific support to enable this. These should be detailed in a WRC Nitrogen Reference Point Guide.

ACRE supports restricting land use change that may result in greater discharges of contaminants. PC1 rules are intended to ensure that land use activities with greater potential to increase contaminant discharge will be subjected to greater scrutiny. We note that the provisions are not intended to prevent land use change per se, but to ensure greater scrutiny of proposals to change land use to more intensive forms to ensure the change does not increase contaminant discharges. A non-complying consent could be granted for such land use change if it can be shown that the change does not increase discharges. We consider this to be an adequate way forward. We need to be careful and considered with our approach to land use going forward.

We support the Council in their attempts to identify farming situations where the effects are considered to be at the low end of the scale, and the farmers have invested heavily in mitigations, ahead of any regulatory requirements for reduction in

the losses of the four contaminants. This may include things such as waterbody fencing, riparian planting and wetlands, sediment traps and retiring land. Many submissions seek a permissive framework for these kinds of farms – so that they are not ‘penalised for having done the right thing’. We note that the Officers are finding it difficult to clearly articulate in the rule framework exactly how this could be done. We offer you our encouragement in this endeavour.

We notice that Waikato Regional Council has sought amendments to recognise climate change as required by the National Policy Statement for Freshwater. We think it is important to consider the potential impacts of the Zero Carbon Act. The act will likely require a 10% reduction in methane emissions by 2030 and 24-47% by 2050 (relative to 2017 levels). This will likely require reduced stocking rates and will incentivise farmers to diversify their land use. We will need to find land use opportunities that both protect water and reduce carbon emissions.

ACRE has been doing some work recently to understand the potential impacts of Integrated Constructed Wetlands. These wetlands have the potential to improve the wellbeing of our river, yet there are likely to be some barriers to their construction. Integrated Constructed Wetlands are being developed at Taupiri. The challenges with the construction of these wetlands relates not only to the resource consents involved but also to the labour force required. One of the issues that we understand going forward with the implementation of the plan change is achieving the people power or workforce to implement the changes required.

The struggle for volunteers is a real and pressing ongoing issue for restoration work. I have worked in a project for close to ten years and have experienced the struggle to get people involved in this work. My project is in a city surrounded by lots of people. The challenge to get volunteers in the rural areas would be even greater. Even with a significant level of qualifications people struggle to find work in this area. Yet it is urgent work, not only for our river but also for our global climate.

In terms of the Integrated Constructed Wetlands at Taupiri, the consents required for moving soil from the District Council were expensive. Such expenses may be avoided through the development of a manual that provides a template for constructed wetlands that will be deemed acceptable within the terms of the applicable district and regional plan - but this is a way off. Connecting with iwi was also a challenge during the construction. Iwi need to be appropriately resourced to ensure their capacity to respond to increasing demands.

We agree with the submitters who suggest that farmers should be able to use, and be credited for, mitigations not modelled in Overseer (such as wetlands, different pasture composition, legume content, rotation length, cultivation practices and depth of soil and soil carbon). And we agree that if additional mitigations not modelled by Overseer are to be recognised as part of a farm’s strategy to meet its NRP, the

process needs to be transparent, consistently applied and supported by rigorous science and modelling

There are some situations where there is sufficient science available, such that mitigations not modelled by Overseer can be incorporated by some proxy or work-around, or can be specifically recognised in a resource consent process. In the case of the Integrated Constructed Wetlands, we understand that more understanding of their impact is required before we can make informed guidelines and recommendations to landowners. The science related to Integrated Constructed Wetlands, particularly in relation to carbon emissions (in the form of methane) is also not that well understood. It seems that in the midst of urgency, we are sometimes only just beginning to understand what might be effective in protecting our waterways and our climate.

Thank you again for this opportunity.

