

SUBMISSION

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To: **WELLINGTON REGIONAL COUNCIL**

Feedback on: Variation 1 to Proposed Change 1 to the Regional Policy Statement for the Wellington Region

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Submission by: **WAIRARAPA PROVINCE OF FEDERATED FARMERS**

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Introduction

1. Federated Farmers welcomes the opportunity to make a submission on Wellington Regional Council's Variation 1 to Proposed Change 1 to the Regional Policy Statement for the Wellington Region.
2. This submission was developed in consultation with the members and policy staff of Federated Farmers. Federated Farmers acknowledges any submissions from individual members of Federated Farmers.
3. Federated Farmers welcome an opportunity to discuss this submission if the opportunity presents.

Insertion of long-term freshwater visions for freshwater

4. Wairarapa Federated Farmers (WFF) supports the insertion of two long-term visions for freshwater (for Te Awarua-o-Porirua Whaitua and Te Whaitua Whanganui-a-Tara) into the Proposed Change 1 (PC1) of the Regional Policy Statement (RPS).
5. Long-term visions for freshwater are required to be included as objectives in regional policy statements by the National Policy Statement – Freshwater Management 2020 (NPS-FM) clause 3.3(1).
6. Below I provide general comments on aspects of both long-term visions. Appendix 1 contains recommended changes to wording of Variation 1.

Timeframe

7. Federated Farmers believes that the proposed 2100 timeframe in both visions is suitably ambitious but reasonable, aligning well with the NPS-FM at clause 3.3(2). This timeframe is also pragmatic, as modifying catchment biophysical systems takes time and substantial resources, including on-farm financial resources. Access to financial resources can fluctuate in the agriculture sector, as illustrated by the recent announcement from Beef+Lamb NZ, indicating farm profit margins are expected to hit a 15-year low and farm profitability to fall by 31% for the 2023-24 year¹.
8. Furthermore, dairy farmers have been contending with persistent decreases in the farmgate price per kilogram of milk². Pressures like a loss of income influence a farmer's decision-making, where essential costs, such as wages and livestock health, must take precedence in the short term over environmental actions, such as fencing and riparian planting. Imposing short time frames for visions, policies, and rules can place unnecessary financial and mental burdens on farmers, impeding long-term progress toward environmental improvement.

¹ <https://www.nzherald.co.nz/the-country/news/beef-lamb-nz-report-finds-farm-profit-margins-expected-to-hit-a-15-year-low/JODRXTPQ45G7ZGYDFPHEY4QML4/> accessed 2 November 2023

² <https://www.dairynz.co.nz/news/farmers-focused-on-making-ends-meet/> accessed 2 November 2023

9. Implementing the NPS-FM is a complex endeavour that requires meticulous planning, collaboration, and coordination among various stakeholders, including government agencies, environmental organisations, local communities, and industry representatives. Federated Farmers acknowledges the long-term benefits of the NPS-FM for future generations. If implemented effectively, it will cater for all three priorities in Te Mana o te Wai (the health and well-being of water and freshwater ecosystems, the health needs of people and the social, economic and cultural well-being of people and communities) and recognise the balance between water, the wider environment and the community, as outlined in Clause 1.3 of the NPS-FM.
10. Initiatives such as restoration, conservation, renewable energy adoption, pollution reduction, and sustainable practices will require time to implement before yielding noticeable outcomes. Federated Farmers applauds the Council for adopting a long-term perspective and maintaining a commitment to the NPS-FM's Objective, acknowledging that immediate results are not feasible.

Food production

11. Federated Farmers are pleased to see that both long-term visions recognise the importance of water for social and economic needs. The concept of Te Mana o te Wai (at clause 1.3(1)) recognises that Te Mana o te Wai is a balance between the water, the wider environment, and the community. The NPS-FM is explicit that Te Mana o te Wai is relevant to all aspects of freshwater management.
12. With that in mind, Federated Farmers would like to see the provision of water for food production purposes recognised explicitly in both visions. Federated Farmers has a particular interest in ensuring that water is available for use for food growing and production purposes, whether it be through irrigation of crops, stock drinking water or processing purposes.
13. Water is intrinsic to food production. Food is a human health need and needs to be prioritised as such. The provision of water for food production should not be lumped under 'economic' when thinking about the long-term vision for a freshwater management unit (FMU). It is impossible to separate out the health needs of people from highly nutritious, locally produced food.

Access to waterways

14. Both visions aim to provide safe access for people and communities to enjoy a range of recreational activities including fishing. While the importance of access to waterbodies for community recreation and customary use is acknowledged and understood, Federated Farmers members have expressed concerns about the potential extent of public access across private land.

15. There are risks associated with unrestricted public access to waterways across private land, including biosecurity risks, health and safety risks and risks to stock welfare. Federated Farmers advocates for a strategic approach whereby councils engage with landowners to develop designated mahinga kai, swimming and recreational access points along waterways.
16. Federated Farmers would like to see the visions amended to reflect this strategic approach and that a balance must be maintained between public access and private property rights, including being able to restrict access to one's business (e.g. a working farm) to manage risk.

Natural water flow

17. Both visions seek to 'have a natural flow' for waterbodies by 2100. It is not clear whether 'natural flow' relates to morphology or hydrology (or both) and whether 'natural flow' is the same as 'natural flow regime'³ (as referred to in the operative RPS Policy 18 and Policy 43). Neither the operative RPS nor the proposed PC1 RPS contain a definition of 'natural flow'; however, it's reasonable to assume that the term relates to the flow of a waterbody as it was before any human interference^{4,5}. The NPS-FM provides some guidance too, defining 'naturally' as in relation to a site, its state before the arrival of humans in New Zealand.
18. If the relevant Whaitua committees intend that 'natural flow' means the flow of a river (or other waterbody) as it existed before the arrival of humans in New Zealand, or before human modification, then it will be impossible for the vision objectives to be achieved. Waterbody flows have been modified for many reasons since humans arrived in New Zealand, including for transport purposes, flood protection, taking for food production, urban and industry use, energy generation, fire-fighting purposes and so on. It is not feasible or practical to 'roll back' all the ways in which flow is impacted by community needs. Furthermore, climate change (especially as it relates to precipitation and temperature increases) is likely to alter the morphology and hydrology of waterbodies in the future.
19. Federated Farmers suggests that 'natural flow' could be replaced with 'natural form and character' in the vision for Te Awarua-o-Porirua. Natural form and character are listed as values that must be considered in the NPS-FM (Appendix 1B), and natural character is already included in the vision for Te Whanganui-a-Tara.
20. Natural form and character are defined in the NPS-FM as the biological, visual and physical characteristics of a FMU that are valued by the community, including

³ Natural flow regime is the characteristic pattern of a river's flow quantity, timing and variability on time scales of hours, days, seasons, years and longer. From: Poff et al (1997). The natural flow regime. *BioScience* Vol 47 (11) pp 769 – 784.

⁴ For example, 'natural river flow' is defined as 'the flows that would be expected if there were no man-made diversion of flow from one catchment to another' in Duncan, MJ, Woods, RA. (2013). Water regulation. In Dymond JR ed. Ecosystem services in New Zealand – conditions and trends. Manaaki Whenua Press, Lincoln, New Zealand.

⁵ Arrigoni et al define a 'natural flow regime' as the flow regime that occurs in basins with little or no direct human interference or modifications. Arrigoni, AS, Greenwood MC, and JN. Moore (2010). Relative impact of anthropogenic modifications versus climate change on the natural flow regimes of rivers in the Northern Rocky Mountains, United States, *Water Resour. Res.*46.

- a. its biophysical, ecological, geological, geomorphological and morphological aspects
 - b. the natural movement of water and sediment including hydrological and fluvial processes
 - c. the natural location of a water body and course of a river
 - d. the relative dominance of indigenous flora and fauna
 - e. the presence of culturally significant species
 - f. the colour of the water
 - g. the clarity of the water.
21. Natural form and character in relation to an FMU or part of an FMU has a clear definition that creates a pathway to a logical cascade of policies including, for example, the daylighting of urban streams, maintenance of flushing flows and removal of barriers for fish passage.

Implementation of the visions to large FMUs

22. The long-term freshwater visions as proposed apply to the whole of the whaitua, and each whaitua is considered to be an FMU (refer to the 42A report for PC1 RPS). This creates obvious challenges in terms of giving effect to the visions, as some aspects of them are neither relevant nor possible for all the waterbodies across such a large area. The obvious solution is to refine FMUs into part FMUs and make the associated long-term visions more specific to the history and environmental pressures of that part FMU. Federated Farmers understands that this work is planned for the future.

END

About

Federated Farmers is a not-for-profit primary sector advocacy organisation that represents farmers, and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand's farmers.

The Federation aims to add value to its members' businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their businesses in a fair and flexible commercial environment.
- Our members' families and their staff have access to services essential to the needs of the rural community.
- Our members adopt responsible management and environmental practices.

Appendix 1

Provision:	Position: <i>Support</i> <i>Oppose</i> <i>Amend</i> <i>Neutral</i> <i>Not stated</i>	Reason for feedback: <i>Please provide a summary of the reasons for your feedback on each provision to help us understand your position.</i>	Changes sought: <i>Please describe the actual changes to the provision that you would like to see and, where possible, include your suggested alternative wording.</i>
Overall variation	Support in part	Long-term visions for freshwater are required to be included as objectives in regional policy statements by the National Policy Statement – Freshwater Management 2020 (NPS-FM) clause 3.3(1). We support the inclusion of long-term freshwater visions for Te Awarua-o-Porirua Whaitua and Te Whaitua Whanganui-a-Tara, subject to the recommended changes discussed above and detailed in this table.	N/A
New section heading 3.4.A: Long-term freshwater vision	Support	No changes suggested.	N/A

Provision:	Position: <i>Support</i> <i>Oppose</i> <i>Amend</i> <i>Neutral</i> <i>Not stated</i>	Reason for feedback: <i>Please provide a summary of the reasons for your feedback on each provision to help us understand your position.</i>	Changes sought: <i>Please describe the actual changes to the provision that you would like to see and, where possible, include your suggested alternative wording.</i>
New objective TAP	Amend	<p>Amend clause 3 of the long-term freshwater vision for Te Awarua-o-Porirua to remove reference to natural water flow and replace with 'natural form and character'.</p> <p>Amend clause 4 of the long-term freshwater vision for Te Awarua-o-Porirua to maintain balance between public access and private property rights, including being able to restrict access to one's business (e.g. a working farm) to manage risk.</p> <p>Add a new clause that explicitly recognises the importance of water for food growth and production and the relationship between high quality (nutritional) food and the health of people.</p>	<p>That clauses 3 and 4 of Objective TAP be amended as follows:</p> <ol style="list-style-type: none"> 3. Have restored and healthy ecosystems that support an abundance and diversity of indigenous species, and have a natural water flow <u>have natural form and character</u> and energy that demonstrate kei te ora te mauri (the mauri of the place is intact); and 4. <u>Where appropriate and with the agreement of private landowners,</u> Provide provide for safe access for people and communities to enjoy a range of recreational activities including fishing, fostering a strong connection to these waterbodies; and <p><u>New clause: Water is valued for the growth and production of high quality (nutritional) food that supports the health needs of people.</u></p> <p>That any consequential amendments be made to give effect to the above relief</p>

Provision:	Position: <i>Support</i> <i>Oppose</i> <i>Amend</i> <i>Neutral</i> <i>Not stated</i>	Reason for feedback: <i>Please provide a summary of the reasons for your feedback on each provision to help us understand your position.</i>	Changes sought: <i>Please describe the actual changes to the provision that you would like to see and, where possible, include your suggested alternative wording.</i>
New objective TWT	Amend	<p>Amend clause 3 of the long-term freshwater vision for Te Whanganui-a-Tara to remove reference to natural water flow and add 'form' between natural and character.</p> <p>Amend clause 4 of the long-term freshwater vision for Te Whanganui-a-Tara to maintain balance between public access and private property rights, including being able to restrict access to one's business (e.g. a working farm) to manage risk.</p> <p>Add a new clause that explicitly recognises the importance of water for food growth and production and the relationship between high quality (nutritional) food and the health of people.</p>	<p>That clauses 3 and 4 of Objective TWT be amended as follows:</p> <ol style="list-style-type: none"> 3. Have mauri/mouri that is nurtured, strengthened and able to flourish and restored natural <u>form</u> and character, have a natural water flow, and ecosystems that support an abundance and diversity of indigenous species; and 4. <u>Where appropriate and with the agreement of private landowners</u>, provide for safe access and use of all rivers, lakes, wetlands, estuaries, harbours, and the coast for a range of recreational activities including fishing, fostering an appreciation of and connection to these waterbodies; and <p>New clause: <u>Water is valued for the growth and production of high quality (nutritional) food that supports the health needs of people.</u></p> <p>That any consequential amendments be made to give effect to the above relief</p>

Provision:	Position: <i>Support</i> <i>Oppose</i> <i>Amend</i> <i>Neutral</i> <i>Not stated</i>	Reason for feedback: <i>Please provide a summary of the reasons for your feedback on each provision to help us understand your position.</i>	Changes sought: <i>Please describe the actual changes to the provision that you would like to see and, where possible, include your suggested alternative wording.</i>
New figure 3.4	Neutral	Further refinement of FMUs into part FMUs, with the development of appropriate long-term freshwater visions for each is required.	N/A