

Healthy Rivers/Wai Ora: Proposed Waikato Regional Plan Change 1
From: Lakes & Waterways Action Group Trust
Box 407
Taupo
3330

Contact: Jane Penton (Secretary)
penton@nettel.net.nz
07) 378 2043

To: The Chief Executive, Waikato Regional Council
healthyrivers@waikatoregion.govt.nz

Lakes and Waterways Action Group Trust (LWAG) is a leading advocate for the protection of Lake Taupo, its waterways and other local catchment environments.

LWAG participated in the Waikato Regional Council Variation 5 and relevant Taupo District Council processes aimed at reducing the nutrient loadings to Lake Taupo. We are fully supportive of the Lake Taupo Protection Strategy.

We continue to actively seek the enhancement of water quality within the Taupo area and firmly advocate for “Sustainable Development Thinking” with regards to any development within the Lake Taupo area.

LWAG has been advocating on environmental issues in the Taupo area, but particularly water quality issues, since about 2000. We have about 100 members.

Introduction

*Plan Change 1: Vision and Strategy - We agree with the Vision and Strategy (Section 3.11 of PC1). We **agree** with the Vision and Strategy. LWAG has been a long-time supporter of ground-breaking legislation and policies to protect waterways, i.e., the Lake Taupo Protection Project.*

Consistent with this, we support the five bullet points on page 15 that give effect to the Vision and Strategy. Particularly, we support a collaborative approach as the key to the solution to the problem. Generally, LWAG supports WRC’s PC1 & the recent CSG process towards providing provisions for improving water quality in the Waikato catchment.

Typically, LWAG aims to find a consensus around its submissions amongst its membership, which includes pastoral farmers. However, we found it difficult to reach a consensus for this submission within the membership. Partly, this is because community consultation has been relatively short in relation to the time-scale (“intergenerational”) of the proposed project. Therefore, we urge WRC and its partners to revisit community consultation and invest more time in building a consensus on some of the considerable changes in the policy environment around pastoral farming in the Waikato catchment.

We support subcatchment - based management of land use to manage water quality problems. LWAG also supports the review of the Regional Plan towards strengthening and clarification of limits and targets in PC1.

We support the long-term implementation of remediation measures so long as these measures are based on good science and heavily consider effects (including economic) on communities.

We have some issues with the detail proposed by PC1 that we would like to bring to the attention of the PC1 hearing panel:

- 1) In regards of 'Swimmability'. The recent debate in regards of the swimmability, and national limits for E. coli highlights the selection of a 'default' limit (i.e., 540 E. coli per 100mL; pages 57 -67). We support the E. coli limits (pages 57 -67) where it is less than 540 E. coli per 100mL. However, we would like to see the science around human health in regards of these limits and the default limit.

Relief sought: That 'swimmability' be defined in regard to human health in this document, and that decisions coming out of the MfE Clean Water package that may set a level lower than 540 E. coli per 100 mL be taken into regard.

- 2) Ref: Policy 1 to manage diffuse discharges of nitrogen, phosphorus, sediment and microbial pathogens. And: related Implementation method 3.11.4.7 (pg 37) referring to Information gathering. And 3.11.6 List of Tables and Maps re; short term and long term numerical water quality targets etc.

While we support these methods, bottom lines should be set in the proposed PC1 for the national compulsory values of ecosystem health, i.e. life-supporting capacity, ecosystem processes and indigenous species including their freshwater ecosystems; and human health for recreation.

Relief sought: Freshwater objectives are included from the catchment (or Freshwater Management Unit) to sub catchment level. These need to include broad objectives and numerical limits. Objectives must not be set lower than current water quality (they must at least maintain water quality) and must seek an improvement in relevant water bodies.

Relief sought: The following parameters, at least, need to be included as freshwater state objectives in PC1:

- dissolved oxygen (DO);
- deposited and suspended sediment (the TLG recommended that water clarity was an appropriate defacto);
- Freshwater Macroinvertebrate Health (Macroinvertebrate Community Index);
- Cyanobacteria and benthic cyanobacteria;
- Dissolved Inorganic Nitrogen (DIN) & Total Nitrogen in the tributaries / sub catchments;
- Temperature, pH;
- Water flows and levels.

- 3) Ref: Policy 9: Sub-catchment mitigation planning etc (pg 33) Planting trees is one option for the reduction of nutrient production from the land. Therefore, LWAG supports incentivising tree planting (as per the Lake Taupo Protection Project), particularly on marginal land.

Relief sought: Specific references to incentivising tree planting e.g. through the uptake of the Government's contestable fund for freshwater improvement.

- 4) Ref: Schedule B – Nitrogen Reference Point (NRP), pg 47. We have significant concerns about the use of Overseer as the sole determination of N generation from land use. LWAG feel that models should be open to scrutiny regarding their methodology. Moreover, they should be gathering data aimed at best practice for mitigation of nutrient loss to land. We also understand that this is of national importance.
- 5) Our members are concerned regarding the timeframes required for calculating nitrogen outputs related to stock management of sheep and beef operations.

Relief sought: We ask that an independent and transparent model be used alongside OVERSEER towards 'rewarding' best management on-farm and water quality remediation options.

Relief sought: We suggest the period for calculating the NRP for sheep and beef is longer than two years, e.g., five years.

Ref: Policy 10. 11. & 12 regarding point source discharges. LWAG have supported Taupo District Council in complying with Variation 5 including through Consent renewals for Wastewater Treatment (WWT) Plants and especially their consented discharge allowances. Considerable nutrient reductions to land can be achieved though the upgrade of WWT Plants, their discharge fields and their discharge consent conditions.

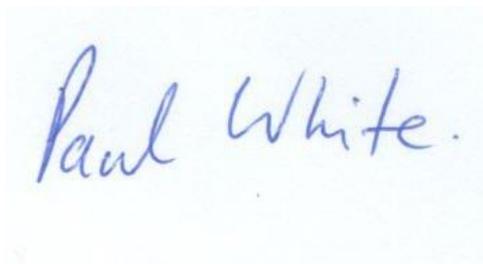
Our concern is with the consent renewal process. Current policy means it will take many years for the process to be completed, as is occurring in Taupo. We feel that if agriculture and horticulture are expected to reduce their emissions, then the urban community should have clear short and long term targets outlined in PC1.

Relief sought: That short- and long-term targets be defined in this policy.

Relief sought: that WRC resources be increased to support the consent renewal process such that defined short and long term targets of these policies are complied with.

We wish to be heard in support of our submission.

Yours sincerely



P. White

Chairman

Lakes and Waterways Action Group Trust