

Your submission to Action for healthy waterways – consultation

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Submitter Type: NGO

Clause

Proposals as a whole - please refer to questions 1-3 on page 19 of the discussion document

Notes

Our Members were unclear whether these proposals would result in an improvement, with just over 60% answering maybe to this question, however, our Members indicated a more positive outlook within a generation. Only 52% were unsure and of those that answered the question 30% thought an improvement would occur in a generation.

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Impacts and implementation - please refer to questions 4-6 on page 19 of the discussion document

Notes

Our Members were very keen on offering suggestions here and even though in favour, expressed concern about the 5m setback being too wide, the goalposts continually shifting, and the reduction of productive land in doing this and therefore the adverse economic impact on farms. Concerns were raised by our Members on the unintended consequence of this wider margin increasing the likelihood of weed infestation such as gorse, broom and carp. Many of the suggestions are very good and we welcome the opportunity to share these with you in an oral setting. RWNZ would like to see the Government offer support through funding to local authorities so that capacity can be increased and resources provided to advise and monitor plans and at the same time Government should provide financial support to farmers to set up and implement farm environment plans. Some of our Members would like the Government to consider funding fencing projects for riparian planting and the ongoing cost of repair in flood remediation especially where fences are broken in a flood and weed infestation has altered the flow detrimentally. This would go some way towards alleviating the cost for farmers.

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Water commission and other comments - please refer to questions 7-8 on page 19 of the discussion document

Notes

RWNZ supports the creation of a Commission with the proviso that rural women are included on the commission and that the commission employs staff who understand farming and can advise as well as monitor the implementation of farm environment plans. RWNZ is concerned that the discussion on this issue so far has placed undue stress on farmers and rural communities and we ask that more stories of farmers who have been doing good work for the environment for years be shared in mainstream media.

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Te Mana o te Wai - please refer to questions 9-12 on page 36 of the discussion document

Notes

RWNZ generally agree with Te Mana o te Wai, however the health and well being of farming families and rural communities must also be considered.

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Restricting further intensification - please refer to questions 51-53 on page 80 of the discussion document

Notes

RWNZ agrees that intensification is problematic in some areas of New Zealand and feel that the RMA process should take care of this as opposed to a moratorium. RWNZ is concerned that greenfield capture for housing development, particularly highly productive land on which fruit and vegetables are grown efficiently, is leading to pressure on food production. Where will this food be grown and if this production is pushed to where inputs and costs are increased, will there be some mechanism to support land use change in the event of this happening. Food security is much needed as per SDGs 2, 12 & 15.

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Farm plans - please refer to questions 54-57 on page 80 of the discussion document

Notes

RWNZ supports the use of voluntary farm plans, however, request that Local authorities work together with farmers and NGOs to ensure there is consistency. Maybe there needs to be mandatory parts, however, we do not want to see a tick-box exercise. Many areas already have plans in place to protect their local waterways and anyone using irrigation would normally already have plans for their farm. It is our view that mandatory is only needed for those who have their heads in the sand. Voluntary plans are always more

productive and there are areas where mandatory plans may be required if there is an issue. Mandatory plans and penalties do not help if actions required are uneconomic and not supported by good science. Required actions will not be static and as such will require constant maintenance, time and money. There needs to be a clear benefit to have any action supported.

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Immediate action to reduce nitrogen loss - please refer to questions 58-64 on page 80 of the discussion document

Notes

Reduce the use of Nitrogen fertiliser and using good farm management practices such as such as reducing livestock intensity, considering different pasture species, fertiliser applications, soil management, and riparian planting to name a few. Increase research into Nitrogen reduction and loss.

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Excluding stock from waterways - please refer to questions 65-68 on pages 80 and 81 of the discussion document

Notes

We agree with excluding stock from waterways as per proposal with some reservations. The 5m strip has potential to take out a lot of productive land, be a fire hazard in a drought, and some wetlands benefit from light grazing in summer (where the area may be dry) for weed control. There needs to be consideration of the effects of waterfowl on waterways too and how their numbers will be managed where there is an issue. There needs to be consideration for the needs of livestock in an adverse event and there should be more information shared about the fact that fences only need to be temporary.

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Controlling intensive winter grazing - please refer to questions 69-70 on page 81 of the discussion document

Notes

We await the outcome of the Government's Winter Grazing Advisory Group

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Other comments on the proposed National Environmental Standards for Freshwater - please refer to questions 76-78 on page 81 of the discussion document

Notes

RWNZ believes that there is a need to determine a definition of a wetland as opposed to a waterway and the differences that can be affected by different seasons, soils etc. RWNZ sees a need to both change the RMA and educate rural New Zealanders on the implications of the Act and therefore, learn about what changes are needed. The RMA is a complicated piece of legislation not fully understood. RWNZ is concerned about the land use issue and how the RMA manages that, especially with climate change and particularly around the ability, or lack thereof, to change land use. Food security will be impacted if this is not managed well. RWNZ also asked our Members about the work they are currently doing in this space and we would like to spend time with officials and advisors to share these. RWNZ would also like to request that there is work carried out with media companies to ensure good farm environment stories are shared and our urban counterparts, businesses and territorial authorities, are held to account at the same level that our rural communities currently are. RWNZ requests that both a gender and rural impact analysis is carried out so that the impact of this intersectionality is considered. RWNZ believes that rural communities are feeling under pressure with these proposals so any work that can be done to assure them of certainty in the future, will be welcome.

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