

Responses to RWC discharges survey - July-October 2017

Outline

The Ruamāhanga Whaitua Committee's discharges survey was available for public participation via the Have your say platform (<http://haveyoursay.gw.govt.nz/ruamahanga-whaitua>) between 1 July 2017 and 1 October 2017. 232 responses were received in total. This document covers the key results of the survey following the structure of the survey itself:

- Managing urban contaminants
- Discharges of nitrogen
- Other contaminants from rural activities

The survey results on questions that required a response scored on a Likert scale (i.e. from strongly oppose to strongly support) were collated and presented in bar graphs showing number of responses for each category. In order to bring the comments from the survey together in a way that is digestible for the Committee while also being transparent, members of the Project Team worked together to identify emerging 'themes' in each survey section (urban discharges, nitrogen, other rural contaminants). Each comment was then attributed to a theme. For each section, responses that were not particularly relevant to the question have been grouped into a 'general comments' theme.

1. Managing urban contaminants

1.1. To what extent do you agree with discharge standards for urban discharges?



1.2. To what extent do you agree with the implementation of an allocation-based approach to contaminant loads from point sources?



1.3. Responses to 'if you wish to add to your response' option for Question To what extent do you agree with the implementation of an allocation-based approach to contaminant loads from point sources?

1.3.1. Theme: Allocation of discharge

- If there is to be an allocation to point sources, we must first understand their contribution to the overall catchment load. In order to do that we must understand the catchment load and ALL contributors to that. That requires understanding of the contribution of non-point sources. If we understand this, and we allocate some to point source, by definition the remaining load is 'allocated' to non-point source. This should be done in a transparent and equitable way. Only focusing on point sources for this process will not result in transparent and equitable allocation.
- These questions are redundant if you have a catchment allocation - by default you will need to allocate a portion of the total to all contributors including point source urban discharges. The second question is unclear in the context of the explanation. Are you asking about allocation to different urban uses notwithstanding they all generally discharge to a single reticulated system or are you asking whether the contaminant from the reticulated system as a whole (i.e. the point source discharge) should be allocated? It would be challenging to allocate to individual contributors because you would struggle to find a model or measuring system to account for all types of discharge.
- I support load limits on non-point sources also.
- As consents are renewed over time they should reflect these allocations and not exceeding an ever reducing cumulative impact.
- If you agree to "allocation" you agree to failure. We need, over time, go to zero tolerance. H&S has already gone through this change in thinking: folks used to expect the odd death in certain occupations because they were recognised as dangerous. That thinking no longer acceptable. The same should apply to discharges into water courses.
- Allocation based would need to protect existing resource consent limits.
- All sources of contamination need to be monitored and reported on.
- There would be no feasible or economic means of monitoring this type of approach.
- The Ruamahanga is a river I ceased fishing in about 10 years ago. Once the Wairarapa Rivers leave the bush line they have limited value as a fishery. You would have to pay me money to swim in any of them. Those that pollute should be fined and those that take water, particularly those who use the water to create wealth, should pay for it.
- Allocation based system cannot be a cop out so that people can trade allocations it must be strictly applied.

- Amount of contaminant going into the river must be reduced.
- Just do the job of looking after the environment as you should be doing.

1.3.2. Theme: Integrated planning

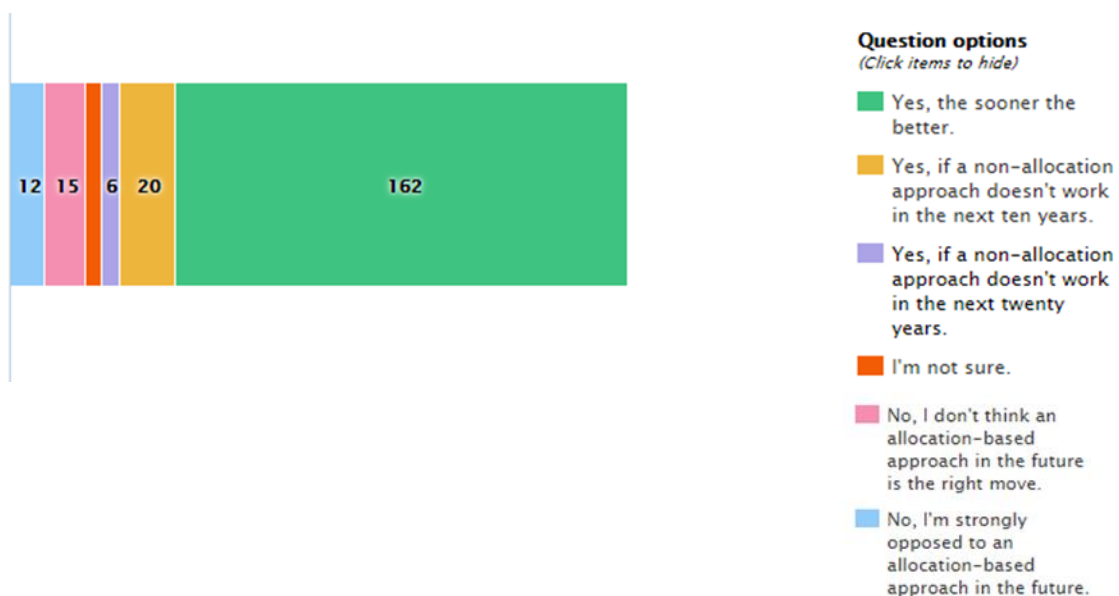
- Must also take account of the location of the point source. I.e. Is it close to a cultural or recreational area?
- Pressure should go on urban discharges. They've had years to do something, and all they do is go and get a further consent from Wellington Region to continue sub-standard discharges. Storm water also has to be taken in too.
- Options such as introducing phosphate free detergents and laundry powder would aid in reducing the cost that councils have to go through to remove phosphate, but would also reduce the percentage that still gets through into the waterways.

1.3.3. General comments

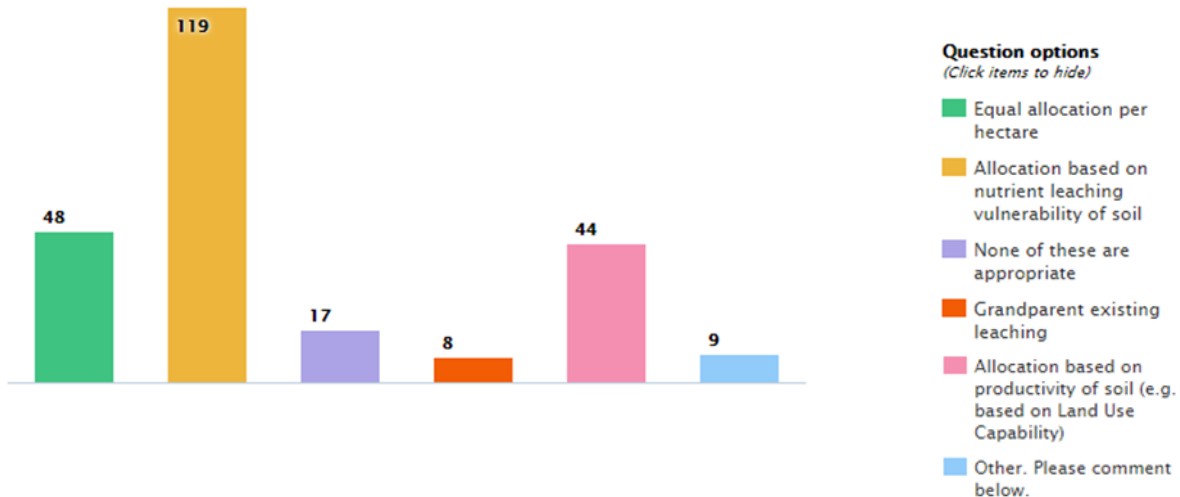
- Stop this horrible stuff getting into our water.
- I support a system that can take into account the collective discharges from public and private infrastructure be they, sewerage systems, roads or households. Household infrastructure and design through policy and consents for new building should be in line with reducing contaminant contributions.
- I have difficulty understanding just what is meant by allocation based approach to contaminant loads. Ideally I don't want any contaminants in the water ways other than those that are indigenous to that waterway.

2. Discharges of nitrogen

2.1. To what extent are you open to the future introduction of an allocation-based nitrogen management approach?



2.2. If an allocation-based approach to nitrogen discharge management was introduced in the future, which of the following approaches would you consider to be most appropriate?



2.3. Responses to 'other allocation approach' option for Question If an allocation-based approach to nitrogen discharge management was introduced in the future, which of the following approaches would you consider to be most appropriate? Other allocation approach?

2.3.1. Theme: Soil capacity

- Should be based on the assimilative or carrying capacity of the catchment, with an allowance for "under's and over"; e.g. a reference point approach would be better than a baseline leaching approach; allowing farm system change
- Allocation based on nutrient leaching vulnerability of soil.
- Allocation based on nitrogen leaching measured on current land use and soil type, regularly updated.
- Mixed approach accounting for geological/edaphic risk (e.g. drainage class, anionic storage capacity), practice risks (e.g., wintering stock off sensitive soils), and infrastructural risk (e.g., construct feedpad) - to assess N-leachate management.
- A mixed approach employing knowledge of geological/edaphic risk (e.g., heavy soils with high anionic storage capacity), practice risk (e.g., wintering stock off sensitive soils) and infrastructural risk (e.g., construct feedpack). LUC is inappropriate.
- I do not think one approach in isolation should be used, this would be an overly simplistic way of determining actions that could have significant effect on some landowners. A formula that covers the type of soil and historic land use may be best.

2.3.2. *Theme: Economic rationale*

- Could potentially use an economic instrument policy such as Watershed Nutrient trading under total allowable watershed limit this could achieve environmental objectives at least cost but this may be too visionary for inflexibly minded people.

2.3.3. *Theme: Equal allocation*

- Equal allocation per hectare.

2.3.4. *Theme: No allocation*

- No allocation approach. Education and real measure scorecards to measure progress.

2.3.5. *Theme: Grandparenting*

- Grandparenting protects legally developed land and investments, but on its own does not provide for a pathway to most appropriate activity and discharge limits. Allocation based on leaching vulnerability has appeal, but should also effects based.
- The committee should set a limit which is not negotiable. Definitely no grandparenting which is a copout.

2.3.6. *Theme: Mixing zone compliance*

- Include a boundary of no discharge a fixed distance [minimum 100m] either side of waterways.

2.3.7. *General comments*

- Stormwater should be addressed as a priority- looking into better options in regards to overflow of storm and wastewater. Home based products (see previous comment on P removal).
- I'm not fully sure which approach would be the best to ensure a fair approach while achieving a significant reduction in nitrogen.
- Ignores the fact that the river(s) are bulldozed from the gorge to nearly the tidal limits, and as such most of the above is irrelevant. Not just nitrogen if limits are to be set it should include a wider range of contaminants.
- In general nitrogen is applied on the more fertile lower country closer to major waterways so if proven to be the case possibly a good place to start.
- I don't have the knowledge to answer this question and I do not understand the significance of some of the terms used. I am cynical when people talk of future change, usually that is an excuse to do nothing.

- The use of better or alternative farming practices is really what would be needed. This also ties in with land use.
- Any approach will require tailoring to get right, but there must not be a single contaminant emphasis that advantages some dischargers and disadvantages others. The two most important contaminants to manage must be bacterial and sediment discharges.

2.4. Responses to ‘if you wish to add to your response’ option for Question If an allocation-based approach to nitrogen discharge management was introduced in the future, which of the following approaches would you consider to be most appropriate?

2.4.1. Theme: Grandparenting

- A sub catchment limit essentially is grandparenting the activities in a catchment unless the limit is set lower than the current catchment concentration.
- Grandparenting is an unfair option due to the fluctuations in seasons over the past 5 years. Furthermore, land use changes would be severely restricted; people have not known that grandparenting is going to be an option – leading to lack of information. Severely oppose this.

2.4.2. Theme: Scale of allocation

- I support the sub catchment allocation. The science tells us we are heading in the right direction with a majority of sites improving. Let’s keep up the good work and not destroy it with rules.
- Non point nutrient discharge from farm land is very difficult to quantify. For that reason I don’t believe an allocation approach is the best answer. As research and development continues in this field, until we have a better understanding on the true effects of fertilizer application and animal waste I think encouraging a best farm practice approach to nutrient management is the answer. As technology improves land/farm management improves meaning there will be a natural unregulated reduction on non-point source nutrient discharges. This is because the farming industry is continually evolving and looking for ways to become more efficient and more sustainable. Instead of regulating the industry allow New Zealand’s number eight wire mentality find the answers to better nutrient loss management.
- The issue is different to direct discharges to water courses. Obviously it is nitrogen to land then possible leaching to water courses. A much more complicated issue requiring good science and monitoring. I’m not sure we are set up to do this on a large scale or have the funds to do it – someone has to pay.

- This approach is thwart with difficulties mainly around the ability to fairly and accurately measure the discharges. Tried and tested methods of reducing/limiting discharges should be encouraged through education incentivizing and working as part of a catchment led approach to change attitudes and behaviors over time.

2.4.3. Theme: Introduce allocation now

- If an allocation model is not introduced immediately and given the parlous state of the catchment overall, the committee should consider recommending cessation of all farm intensification activity. There is a danger that a delay in introducing an allocation model will result in further N degradation of the catchment and that will result in a longer and more painful journey back to health. At the very least, if we do delay allocation let's limit damage to present levels.
- The whaitua committee should be determining what the water quality limits are now and what the allocation status of each catchment is. That is the fundamental starting point and you should be able to tell the community that information right now. Unless the actual instream concentration is well below the limits, allocation is essential to be able to effectively manage discharges to prevent over allocation and to resolve any over allocation. Kicking the allocation can down the road will inevitably result in the limits being overshoot before a response is implemented in the future. It also incentivises a resource grab. The committee should also be modelling current land use to determine likely load being contributed so we aren't surprised by instream measurements in the future as the load to come arrives. If modelled load indicates future over allocation then need to get allocation system in place now.
- There is no way to manage nitrogen with a 'non allocation' approach. If you allocate to point sources, the remaining nitrogen is by default allocated to non-point sources. If there is not an allocation system in place, nitrogen will be taken up on a 'first in first served' basis. This will favour highest polluters, and will result in late movers missing out. This will be inequitable. It also means that there is no mechanism to avoid getting to the limit. Allocating once the limit has been exceeded is too late. Allocating now will send a good long term message to the farming community, and avoid over intensification and the risk of stranded capital if farms intensify with no guidance as to limits, only to find their allocation reduced in the future (which will be inevitable with any allocation system other than grandparenting).
- Theme: Allocation on basis of land use capability or vulnerability.
- Effects based measures are required. Grandparenting provides for protection of legal investments and development, but must be coupled with a mechanism for transition to 'agreed and sustainable' contaminant loss levels over time to provide for economic security. Nutrient leaching vulnerability and land use capability are not necessarily effects based e.g. free draining soil by the ocean may have lower risk of adverse effect than a less free draining soil by a shallow lake. Output based (losses) approach helps address the

adverse effects while providing for flexibility and innovation for activities. Equal allocation is neither effects based nor provides for previous legal development and investment.

- If there is to be an allocation system it should be designed to encourage sub-catchment level collaboration for the necessary commercial and land management innovation and experimentation that will be required by these changes in policies. Grandparenting should absolutely not be used. If allocation, linking to land use vulnerability or capability is more desired.

2.4.4. General comments

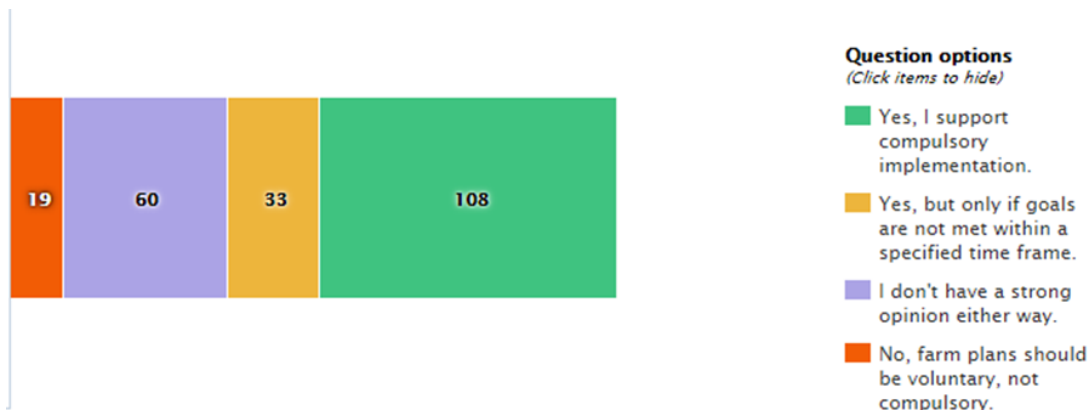
- Nitrogen leaching is a farm management problem and much can be achieved to reduce this at the farm gate. Soil type and stocking ratios have a big part to play as well as irrigation that intensifies the leaching on Wairarapa's alluvial soils. It is non nonsensical to expect Nitrogen leaching to reduce when Farmers are still being encouraged to borrow more and intensify with irrigation on alluvial soil types.
- It's all about how much N is required to grow a useful crop and how much N a soil can handle without leaching. Gravels and clays would be managed differently.
- The contamination of our waterways will affect the future of our whole country- no industry need pollute our waterways. Past abuse needs to be addressed now- The polluter needs to pay for the damage as part of the terms of trade- if they cannot cut pollution to an acceptable level which will immediately reduce the pollution, they should stop their business. Tax payers should not have to fund corporate pollution.
- The objective as I see it is to achieve ecological intact and functioning waterways with species present in proportions that would constituent relatively undisturbed communities in that location. All the while keeping the agricultural community economically viable so that the land is not sold to overseas corporations. Currently they are being subsidized environmentally by the rest of society so consider financial assistance subsidies short term to transition to more holistic practices as opposed to continuing environmental degradation.
- The need for \$ support for more science we may find introduced fish has had the biggest impact on water quality in the last 150 years, already there are water ways beside us we are told are over populated with fish with evidence of the maturity size getting smaller over the last 20 years we need to understand what the sediment is actually made of !! cheers
- The source has to be the initial problem.
- I know that WRC allow farmers to herd their cattle into rivers to graze so I have no faith in your committee. I expect it is just a method of delaying doing anything that will upset cow farmers and local councils who have sexier ways to spend money than managing water.

- If it is the groups "preference" to do these things it would seem pointless to say otherwise, appears somewhat predetermined to say the least
- "You are being misleading with your opening statement "nitrogen causes algae and aquatic weeds" as you know it takes a combination of factors including low flow and high water temperature to create algae.
- Nick Smith should not be allowed near any recommendations. Mainly because it will affect his brother's financial situation.
- You are supposed to be balanced in your views.
- How and who are going to be able to monitor such ridiculous ideas.
- The implementation of an allocation based approach makes me nervous, the effect on potential land use and the subsequent value can be significant. This approach may not allow land owners to change their systems to meet future market changes in consumer demand. The criteria used to determine the levels within any allocation approach need to cover a range of factors related to the soil (including historic land use as the value paid for the land reflects this) and even then the results are only coming out of a modelling approach that frequently changes (e.g. Overseer), rather than actual testing. I agree something needs to be done but I think significant work is required on how this would look, and the above indicates an overly simplistic approach.
- Due to the advertising document library/FAQ side bar on the right of this page, couldn't see what the other choices were. Excessive Nitrogen is doing so much harm to our waterways that no limit should be acceptable. Can we not learn from other dairy intensive countries? Animals on their own are not the problem, they never single hoofed' destroyed the planet in the past, so why now?
- No single contaminant focus is supportable. Allocation of the responsibility to manage all contaminants is the critical factor.
- Dealing with one element on its own is not a holistic approach when many different factors such as flow swing the sensitivity of the readings. Weighting the importance of one factor in relation to the level of the standards So Sediment control could be the higher weighted pollutant in one catchment but not Nitrogen. Nitrogen control would not be targeted. Then clearly catchments that have nitrogen as their biggest contributor are asked to tasked more to that element. Farmers have been very active with soil erosion and good systems are being employed to slowly heal hill country. Education and Technology are catching up with Nitrogen Sustain N GPS placement being examples of this. Old practices are naturally grandfathered out as each new crop of graduates enters the industry. Introduction of new expectations have already changed the behaviour of many the only real problem is accurate measurement of our progress. An unrealistic public at how fast primary industries can change direction.

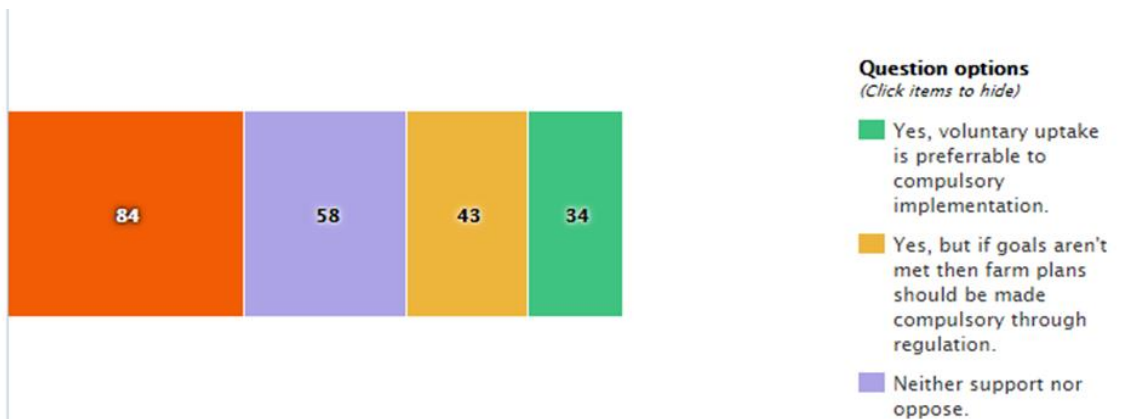
- I'm very concerned by stormwater discharges - as well as agricultural runoff- and the adverse impacts of these on rivers but not knowledgeable enough about the science behind the above options to choose an option.

3. Other contaminants from rural land uses

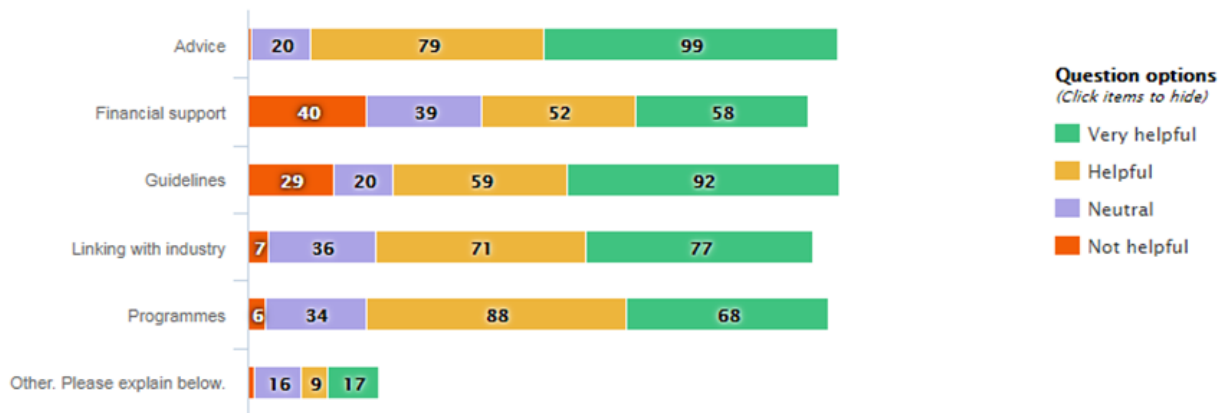
3.1. Do you support the compulsory implementation of farm plans in areas where there are high contaminant concentration loads? (These areas are yet to be specified).



3.2. Do you support voluntary farm plan uptake?



3.3. What are the best ways to support farmers and sub-catchment community groups to manage contaminant discharges?



3.4. Responses to request for 'other ideas' for question: What are the best ways to support farmers and sub-catchment community groups to manage contaminant discharges?

3.4.1. Theme: Education and advice

- There are expert professional people out there that can help everyone, but both a lot of farmers, along with politicians who believe that economics is far more important than anything else and they are right...in the short term.
- Extreme events are perhaps the most difficult (almost impossible?) to anticipate and manage. So no matter what advice, guidelines or programmes have been given/implemented, some land use thought to be appropriate might be found not to be under some conditions.
- Helping farmers in developing economically viable and environmentally favorable farming methods.
- The people who are running these sub catchment groups also need to be regularly monitored and regulated- to prevent a change in direction from the root cause and reason for contaminant changes. Education to lifestyle blocks is key in regards to soil degradation from overstocking in small areas- particularly through the winter months. Programmes should be used as guidelines- never a one stop option for everyone.
- This is all very well, but one needs the right advice and programs to protect the environment or it's just a waste of time and effort and money.
- Education of correct practices to ensure future water quality of a high standard.
- I believe education rather than regulation is the best way to reduce contaminant discharge. This can be done through setting up sub catchment groups in hotspots and giving them the advice and tools to achieve their goals. Minimising regulation in my

experience gets far better community buy in and willingness to achieve the desired outcome.

- Presentation of working examples that are achieving positive results is most helpful for the public to gain greater understanding of the issues along with examples of poor management practices in order to draw comparisons.

3.4.2. Theme: Industry good practice

- Utilise and integrate with other industry/regional authority good management practice tools (e.g., Riparian Planner already does this, freely, driven by farmers and supported by GWRC/DairyNZ/B&L).
- Utilise and integrate with other industry/regional authority good management practice tools (e.g., Riparian Planner already does this, freely, driven by farmers and supported by GWRC/DairyNZ/B&L).
- Advice and programmes should be evidence and science based not captured by industry or lobby groups.

3.4.3. Theme: Information and monitoring

- Accurate real measurements. Averaging results over a year or longer not chasing spikes rather the trend.
- Better water and land monitoring programs so locals can better understand the problems. Support farmers monitoring own farms
- Accurate scientific information is the key. You cannot expect farmers to make management changes and invest into riparian planting reduce stock and fertiliser without the scientific data to show that these changes will make a difference. Setting up flagship farms where these practices are implemented will encourage other farmers as will regular farmer meetings.
- Standardised water testing and testing kits so we are all able to report and share the same data.
- Facts need to be put out there Data etc so then people can see where we are and where we need to head.
- An obvious water quality indicator or technology based indicator that sub catchment groups can self-monitor. This needs to be an advanced early warning type system , e.g. indicates before contaminants enter major waterways e.g. in vulnerable streams maybe?

3.4.4. Theme: Regulation and enforcement

- Don't regulate

- Monitor and fine
- A stop immediately and prove compliance before restarting. 4th time Fine/legal ban for a period of time. Big company's pay larger fines- relevant to company size.
- Programmes and guidelines need to have a penalty regime shown so that if the contaminant discharge is not management the authorities who apply the regulations have the power to enforce cleanup.
- Regulation required.
- Regulation.
- Regulation that are enforced.
- Like Health & Safety - Set a zero target, Train- assist- monitor and fine. Inspectors should be able to stop any business immediately, just as they would in a serious injury situation. Fines and penalty's should be relevant to the size of the business - eg. a sole trader, Hobby farm - warning and advise first time, small fine and advise and warning second time- 3rd and final warning and larger fine.
- Regulation for those who don't like the voluntary or collaborative approach.
- There has to be a limit that is clearly identified and enforced. Without this there is no incentive to spend money on farm plans and catchment management. The current leaders will do this, but the laggards will not, and the cost will not be spread proportionately. Critical best management practices must be made compulsory on all farms, not waiting until voluntary uptake.
- There must be a cutoff between high intensity discharges and low intensity dischargers. The low intensity dischargers should be identified (method like PC6 for Tukituki) and excluded from the requirement for compulsory farm plan, or a lesser standard of plan should be required.
- All the listed means, but no financial help to farmers who have previously been manifestly and knowingly uncooperative.
- I don't see why support is needed. The polluter, rural and city should pay for the mess they make.
- Try every avenue going noting industry likely to obstruct. Financial support does not give correct message as polluters should pay and pass on costs as needs be.
- Clarity of their roles and objectives and the rules within which they operate. Incentives for meeting objectives and penalties for failing to do so.

- Assist farmers/landowners with additional manpower and machinery eg; for riparian planting or bank consolidation etc.

3.4.5. *Theme: Behaviour change together*

- Best support will be achieved through a range of strategies, but they must be practical with good incentives for uptake. One to one engagement or support through local peer groups can also be powerful. Industry and market focused drivers can also be powerful in supporting change (where change is required).
- Huge advances are being made in this area. Simple peer pressure works a treat! This is often done through field days.
- Other being catchment based collaboration to drive commercial and land management innovations. These shifts of practices are likely to require realising higher value production and whatever the helpful support to drive this should be supported by policy.
- From working within community groups myself, one of the best things you can have is a person within the group who has undergone additional training in the subject, or has previous experience.
- Facilitator.
- Catchment collaboration.

3.4.6. *General comments*

- Industry tends to purpose profits and private interests above all else. Their track record on environmental protection is poor.
- Sub catchment groups may be ok for specific programmes. But would have a shelf life for those who would contribute.
- The damage is extreme to date. Pollution needs to be slashed and offenders must pay to clean up the damage to the environment and waterways - caused by the lack of morality in short term profit taking.
- Champion those who do a good job - this motivates others and is a positive contrast to the negative behaviour of Fish & Game & the hard core Greens.
- I'm sure farmers want what is best for their environment, the problem is - like everyone in any industry, they are too busy trying to keep everything together to have the time or energy to make improvements that will benefit the environment.
- How do you educate this sort of logic and to whom?
- Linking the actions to outcomes – i.e. no point having a farm plan to deal with an issue which isn't an issue in a certain catchment. Can't be one size fits all.

- We need to implement these changes now. Not in another ten years. This is a very important issue.
- Penalties are not a good way to go in such circumstances. Getting the businesses back on their feet should be the priority. Whether the land should be subsequently re-rated disallowing that use/ discharge is going to have to be managed properly, so tight regulatory regimes I don't think will work.
- Those who make a profit from water use and those who create pollution of river systems should cover the costs of repairing the system. This should be enforceable by law. After a profit-making water user has used the water, it should return to the river as clean, or cleaner, than it was prior to their use. Those who draw water from the river should have their intake downstream from their discharge - that way they will ensure that water returned to the system is clean.

3.5. Response to 'If you wish to add to your responses' for Question X. What are the best ways to support farmers and sub-catchment community groups to manage contaminant discharges?

3.5.1. Theme: Scale of intervention

- Something that I have not seen discussed is lifestyle blocks. A one hectare lifestyle block has a far greater water use and discharge than intensive farming.
- My question is what size property would constitute a farm. If a small rural block is a farm plan the best option.
- Regulation vs non-regulatory
- These methods are only effective if farmers know where they stand at the moment and what they need to achieve in the future. They need to understand the relationship between what they do on their farm and the outcomes in the receiving environment. So all methods need to be able to demonstrate how they will work to achieve the outcomes. Shouldn't disregard the value of regulation in the overall formula for behaviour change.
- Anyone who has the potential to damage the environment from their activity should be required to demonstrate how they will limit the potential for damage to occur in an ongoing action plan. Sadly, I support compulsion because there is still a group of farmers out there who will not take a responsible approach until compelled to. Compulsion only impacts the unwilling.
- I support strict controls on pollution and education and no financial support to help.
- "As with any group of people, working with farmers rather than coming out with 'the big compliance stick' right away is the best approach. If something is introduced with the words 'compulsory implementation' then buy in and willing engagement in the process

will be very low. If people come out and work with farmers, and then set up a plan with those who are clearly not meeting targets this will be a far better approach.

- It is important to truly understand the problem (without blame) and as a catchment group work through the possible solutions, the expected outcomes need to be owned by the community and therefore community involvement is essential.
- I believe education rather than regulation is the best way to reduce contaminant discharge. This can be done through setting up sub catchment groups in hotspots and giving them the advice and tools to achieve their goals. Minimising regulation in my experience gets far better community buy in and willingness to achieve the desired outcome.
- Split the operational and regulatory compliance roles of the regional council to enforce existing and future regulations with field officers providing practical advice/support.
- Having worked in the septic tank industry I can confidently tell you that in excess of 50 % of septic tank systems do not operate as per their design. I recommend a bi annual warrant of fitness should be introduced.

3.5.2. *General comments*

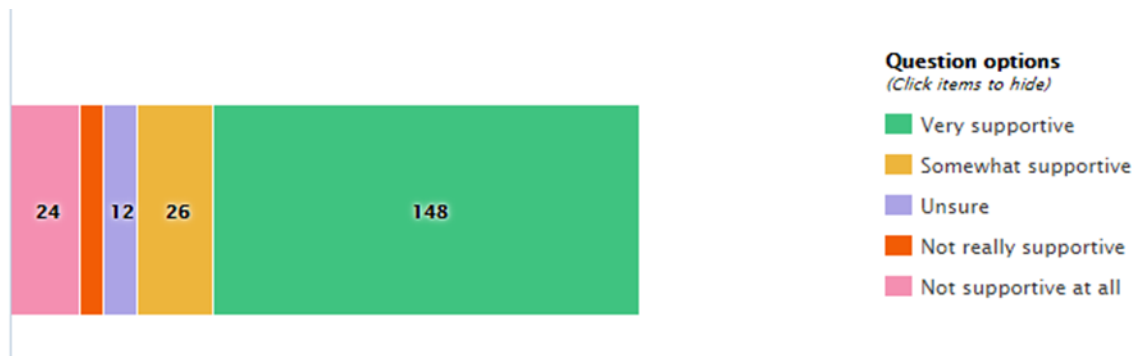
- As a member I received this survey through the Fish and Game newsletter and was shocked to see they somehow think that supplying the answers they would prefer is either legal or helpful. There seems to be a greater disconnect between rural and urban creeping in. This is quite hurtful, given as a farmer I love sharing my hunting with F & G members. Maybe not for much longer!!
- The new government should get on top of this very quickly because 'we', as a country, are quickly losing control of our water quality. Better laws regarding water extraction and application of penalties if water rights and water quality standards are breached. I have grand-children and great-grand-kids too and I want them to be able to enjoy our clean rivers in the future - and their offspring too.
- In the interests of fairness I would expect that any farm plans and their subsequent goals / requirements would have the same timeframe as bringing urban water discharges into line.
- Start out as you intend to carry on, not by managing contaminants but by eliminating them! Prosecute polluters each and every time they are caught. Pollution has been going on now for many years everyone knows the rules! In fact you shouldn't even be doing this work, it is not the work for amateurs, this is the responsibility of The Greater Wellington Regional council.
- It doesn't matter to me whether it is a dairy farm, a factory or a sewage system - there is no valid reason for allowing polluters to continue. I do not expect WRC will ever do

anything practical to stop those who pollute for profit to change their ways.

- Stop all pollution to waterways find a better way to farm.
- I am totally against farmers and agriculturists using sprinkler systems in the heat of the day as the evaporation rate is nearly 50% of the download, therefore a complete waste of water. Water should be controlled between the hours when the most benefit will be gained.
- There is already a lot of knowledge on what we can do to minimise the environmental impact of agriculture the problem is getting it implemented. We know the sources quantities and the pathways of contaminants into the waterways the issue is getting these down to a level that can enable ecologically intact waterways to exist. The law of diminishing returns has some scope e.g. reduction in nitrogen inputs by say 20% will not reduce outputs by 20% but will likely result in a greater than 20% reduction in leaching. The objective should be to achieve financially viable family businesses not MAXIMUM PRODUCTION CORPORATE ENTERPRISES.

4. Land use change

4.1. How supportive are you of the need to apply for consent when someone wishes to intensify or change a rural land use activity?



4.2. Responses to 'other options' for question What other options would you consider appropriate for ensuring that changes on individual farms do not exceed sub-catchment limits?

4.2.1. Theme: Allocation

- Using an allocation regime.
- Allocation trading.
- Other tools
- If someone wishes to change land use, develop a hypothetical farm plan and look at nutrient discharges. But also then consider mitigation factors the farmer could implement to reduce this e.g. riparian planting, barns so that effluent could be discharged at appropriate times etc. I am not supportive of using a simplistic yes or no approach.
- Best practice guidelines.
- Education that the land/soil type is matched to the land use.
- All efforts possible should be made by industry and regional council to make catchment level information about the condition of the sub-catchments and where they sit in relation to cumulative contaminants transparent and accessible. This would be one helpful step towards transparency.
- Individual Environment Plans. Changes in farming methodology such as reductions in feed lots and winter feed crops.

4.2.2. Theme: Enforcement

- Regular inspections and prosecutions where appropriate.
- Anyone exceeding sub-catchment limits should be penalised (as ratepayers currently are for additional water use) through additional rates charges or something similar that would go towards the groups managing the sub-catchment areas.
- Strong enforceable regulations that are enforced by the regional council.

4.2.3. Theme: Do not support consenting

- Any type of intensive land use change that involves stock already requires a consent to discharge as a majority will have some sort of feed pad, standoff area, milking shed. No need for more red tape.
- The option of consent to change land use sounds like the most draconian form of grandparenting allocation method possible. If grandparenting is to be introduced, there must be a fair and equitable process also introduced, which provides for transitioning to

the most beneficial and 'appropriate' discharge levels / land use activities for the economic, social and cultural benefits of the region. Simply grandparenting, with a resource consent to change land use will not provide the right signals and mechanisms to optimize land use.

- Consenting an activity is a very financially expensive and time consuming way of managing resources. I strongly oppose consented land use change. Land use change should be a permitted activity as long as best practise methods are followed.

4.2.4. Theme: Consenting

- Issue consents with a range specified for discharges (possibly linked to seasons and other factors) supporting by robust monitoring and enforcement regime.
- Best farm practice for the proposed farming change will identify the correct land class for the required use. Controlled activities on certain land classes maybe appropriate.
- The resource consent process using controlled activity status is an appropriate tool it is the detail and implementation that will determine if environmental objectives are achieved.
- Consents should be sensitive to land management practices that may reduce contaminants at not treat all 'dairy' or 'beef finishing' the same.
- Consent based approach to assessing catchment capacity is likely to be helpful but also has its limitations. The unpredictability of the consents process and the usual lack of information about the basis of how the consent will be assessed creates significant costs and uncertainty for land owners.
- Regulated buffer zones along waterways to permanently remove stock for corridors. Specifying specific activities in Resource Consents allowed on a farm by farm basis.
- Changes of consent or existing consents should have to be reviewed say 3 yearly as a lot of degradation can occur in a short period of time.
- Compulsory farm management plan.
- Inspect & monitor, noncompliance of agreed terms means stop and correct before re starting.
- Should be a regulatory requirement with the enforcement of penalties for breaches.
- Occasional mandatory independent testing.

4.2.5. Theme: Monitoring

- Long-term annualised modelling of nutrient, sediment and pathogenic loading to receiving environments.

- Instituting a series of bi monthly contamination tests for a period of 24 months.
- Ongoing monitoring prior and post any agreed change of use or intensification of use.
- Farmers should have the option to provide information to the RC that they have been collecting and illustrate what their land use is doing to the waterways or catchments linked to their farming area.
- A monitoring system
- Once again we come back to quality monitoring , monitor the area of land use change and plot trends and feedback to owner, modify land use if standards not met, or worse case scenario stop.
- Collection of data to see if levels have changed, perhaps other individuals are using land in same way in close proximity so can gauge from them, from what I've heard applying for consents is painful at present so people will shy away with this kind of system in future.
- Long-term, rolling-year modelling and reporting on catchment nutrient, sediment and pathogenic loading to water, as well as concentrations at sensitive locations (e.g., not throughout catchment but at receiving nodes of multiple rivers or for sensitive wetlands/lakes).
- You either set allocations on a farm basis and then try to monitor as how do you assess the effect on a sub catchment when you don't have a decent monitoring system.
- Sub-catchment groups that self-monitor with council support, integrated approach.
- "Regular Point of care self-testing and audit in association with specific mapping.

4.2.6. *General comments*

- If consent is required there must be the ability for movement of the discharges allocated by the consent - some operations are not static due to rotation, leasing arrangements etc.
- This is up to the regional council to stand firm when one wishes to intensify beyond the farms capability of damaging the land concerned and the environment.
- Sub catchment limits are grandfathering on a massive scale Time should be allowed for adaption and uptake of new and old practices to mitigate and manage. Limits by numbers will only hold back farming innovation and freeze a lot of farms in time. The direction farming will go in terms of economic survival should only be limited by the imagination not the cost of compliance and uncertainty consenting places in the path of new or different uses.
- Cropping is self-regulating in that it is only profitable with very good management practice, there for only the inputs required are used so there should be no run off.

- Definition of change needs to be clear - recent challenges with farmers over wintering cows on farm rather than with graziers, is that farm system change, or an economic response.
- Any sensible business person is going to assess the suitability of the land (and climate, etc.) to achieve the desired outcome. Getting a bunch of "officials" who have likely never run a business to intervene would be very counterproductive. It is also contrary to private property rights.
- How many extra rsu per ha change = farm system change?
- Keep bureaucracy to a minimum, based on clear science!
- Should less intense practice on individual farm/s be allowed to be offset by increasing somewhere else? Probably not. Hence is the reverse sensible either?
- Prove the activity will not worsen the environment above the minimum standard.
- Limit dairy farming.
- "Why is "change" the trigger? This question implies that those that those who have polluted without, or taken water in unrestricted quantities in the past should be allowed to continue carte blanche into the future. The further I get into this survey the less faith I have in your Committee.
- If for example a farmer wishes to intensify grazing fields then this should be looked at with other remedial activities that will ensure greater protection to the environment.
- Settling specific catchment limits will be subject to so many variables, I suspect it will be almost impossible to get agreement of landowners. Good luck!
- Best way for all this is to have a pollutant tax if your discharges whether point source or diffuse exceed a baseline. This was small polluters pay less (it is a proportionate impact) while big pay more and are therefore incentivised to reduce pollutant output.
- It is important in this region that LUC 1 and 2 land is not turned into anthropogenic development or into lifestyle sections.
- Set limits lower than anything current. In fact, set low "actual" limits that cause a huge reduction in dairying.
- E.g. Cutting of planted forest leads to significant erosion potential. Are you going to stop cutting? That seems fraught with possible fishhooks.
- This is a very vague question. If you mean by sub-catchment limits, the amount of annual rainfall expected in each area, then I would want the GWRC to make damn sure it did not exceed the amount of water farmers or others can extract from the aquifer as has

happened by GWRC in the past. This regional council has got a very poor record of protecting its water!

- "Not enough detail given to answer this question. Depends on adequacy of current District Plans under RMA. But consider:
 - Dairy conversion from any other farming.
 - Forestry to pasture
 - Orchard to cropping
 - Dairy intensification
- You say you are not allocating, but the regime you have described above is an allocation regime. It is 'first in first served'. It means that those who are first to change land use or intensify got access to the 'head room' and those that are last get nothing. This regime rewards early movers and disadvantages those arrive late. It does not incentivize efficient use of resources or efficient pollution reduction. There needs to be a more equitable allocation system so that everyone in the catchment has an equal access to allocation, and so that efficient use is incentivised. It needs to be possible to move allocation around between users (trading) to allow for efficiency in the system.

4.3. Response to the question to 'add to your responses' for question What other options would you consider appropriate for ensuring that changes on individual farms do not exceed sub-catchment limits?

4.3.1. General comments

- Depends if you go down the path of Horizons and decide to issue consents that don't comply with the National Policy statement and their own policy document the One Plan. Plans and policies are useless if they ignored so integrity in keeping to objectives is crucial.
- Set limits that will reverse the current desecration of our homelands and waterways. Pakeha love our country and want it returned just as much as Maori. Our fathers died in their thousands to protect and preserve it. Now the generation of entitlement wants to lay it to waste in the pursuit of individual wealth.
- It totally depends on who the consent is being asked of, doesn't it.
- Farmers are driven by sound economics. I've not met a farmer who would change land use for some short-term gain that destroyed the farm and defined the operation as foolish.
- Note that the use of the District Plan under the RMA is fully regulatory for all new users, but probably grandfathers in all existing users no matter how poor their practices are.
- Forestry contributes major sedimentation during harvesting operations, a much more

robust system of managing sediment is needed. Cattle at this time of year are major contributors of sediment to waterways, silt traps are needed where possible to catch at least some sediment.

- Science and farming practices are improving at a great rate, the accomplishments over the last decade have been outstanding and should be celebrated and more of the same supported with long term stable rules.
- Dairy farming intensification has created a big problem in NZ and the problem just keeps growing. This survey feels a lot like the 'close the gate after the horse has bolted routine' so good luck with whatever your recommendations will be.
- We know the catchment is at a tipping point. We all have a responsibility to improve the overall catchment water quality. Changes in land use must be managed away from intensification. Consenting seems the only way to ensure that we don't get N creep from incremental or widespread intensification.
- "The goal is to reduce contaminants and the consequences of those contaminants in the rivers, streams, lakes and wetlands generally. Land use in itself is a very rough tool. For example, lower intensity dairying (grass fed only) with reasonable vegetative barriers alongside waterways may keep contaminants at an acceptable level. This example alone suggests that there might be a minimum of four classes of dairying land use: High and Low Intensity, coupled with Good Contaminant Amelioration and Inadequate Contaminant Amelioration.
- In terms of a any industry that draws water - the should pay for their water use. Farmers should have an incentivise scheme. For example; scrap all existing water agreements, charge all farmers xxx per litre of water, provide a 25% discount if they fence their water ways, provide another 25% discount if the use sensors to accurately control the amount of water they apply, provide a further 25% if they plant out their riparian strip the will find that their water costs are minimal. Leaving environmental care to the farmers clearly has not worked. It's a bit like the Ruamāhanga Whaitua committee - they have been around for some time now and their impact has been worse than useless as the rivers have continued their downward spiral.
- The Whaitua needs to recommend that the councils stop over-allocating our precious water resource. I watch our rivers run dry, whilst paddocks are being irrigated all through the day. How does an individual gain rights over a public resource? There is something wrong and corrupt about what the councils are doing. Please tell them to stop!
- Over regulatory processes become difficult and expensive to enforce and maintain, relationship between uses and authorities is one of regulation and mistrust rather than partnership and cooperation.
- Consenting/Minimising land use change is an inappropriate method as it will affect land

values. It has the potential to cap regional production. And will hinder any development of large scale irrigation projects.

- The polluters, i.e. farmers, carry 100% of the onus to assure their activities do not exceed water quality of any watercourse.
- Over the whole this process has started to direct its questions along the path of sub catchments and limits, which has been repeatedly challenged and disapproved of at the consultation meetings. It seems that the committee isn't really writing new policy based on responses but more about what the policy writers in wellington indicate as acceptable to them. The key responses I have noted at the meetings are: Willows need removal; sediment in the Taureru catchment is the biggest problem needing to be targeted; more measuring that is real and actual needs to be done, models are not a seller; the plans already in place via wreci and our regional council land management officer are an ideal platform to continue mitigation work and education of land users of best practice.
- This begs the question how the council will determine how much of a particular contaminant each activity will be allowed to discharge without an allocation regime in place. Need to account for all permitted discharges plus all already consented discharges when determining each individual consent application. More or less impossible without either a comprehensive accounting system that is constantly updated with all discharges or an allocation system. Run some scenarios and ask an experienced consent officer from the council to try to figure it out without an allocation regime.
- Environmental efficiency and offsetting should be considered when looking at land use change also including climate change.