

Next Steps for Freshwater – INZ submission outline

1. National Objectives Framework

- a. Amend so 'maintain and improve' applies to a Freshwater Management Unit
Support
- b. Maintain and improve attributes remain within an attribute band
Object - there are multiple ways of achieving an objective (combinations of different attributes) the focus needs to be on the freshwater objective

2. Macro-Invertebrate Index (MCI)

- a. Addition of MCI as a measure of water quality
Conditional Support - the differences between, gravel, muddy and ephemeral streams must be accounted for in any measure

3. Significant Infrastructure

- a. Exemptions
Conditional Support - further direction required around this but any criteria developed need to ensure it does not simply become a get out of jail card for hydro-generators – further discussion required due to the linkages with irrigation schemes.

4. Coastal lakes and lagoons

- a. Inclusion within NPS
Support

5. Stock Exclusion

- a. National Regulation for stock exclusion
Conditional Support – concept of a national regulation and timeframes OK but slope classes could be problematic for some scenarios (extensive high country for example). Need to allow for a Farm Environment Plan approach to assess risk and apply stock exclusion as appropriate

6. Technical Efficiency & Good Management Practice (GMP) Standards

- a. Technical Efficiency Standards for allocation
Conditional Support – should apply everywhere regardless of allocation status, where irrigation scheme infrastructure conveyance efficiency needs to be accounted for, reliability of supply needs to be factored in (Central Otago examples – spray in combination with flood) consideration of timeframes for irrigation scheme infrastructure modernisation projects is essential – farm modernisation often links to this
- b. GMP Standards for discharges
Conditional support – should apply everywhere regardless of allocation status, narrative approach in combination with modelled outputs required
- c. Require Councils to apply at defined times
Conditional Support – only required on permanent transfer where not already applied, otherwise transfer should be allowed to occur unhindered

7. Transfer

a. Better Enabling Transfer

Support – Standardised consents, model plan provisions, particularly highlight need for water user groups and scheme infrastructure in this

Conditional Support – Information availability, unsure as to how this useful this would be for better enabling transfer (but as most Councils provide this information already it is of little concern), real-time data is the enabling factor (particularly as seasonal transfer is where the gains are to be made) but this is best left for user groups or irrigation schemes to work through

Consider permanent versus seasonal transfer scenarios and the application of the technical efficiency test to address community concerns of whether the water should be 'given back to the pot' or 'able to be transferred'

8. Over allocation

a. Guidance to Least Cost Approaches

Support

9. Council funding

a. Increase Ability for Councils to Recover Costs

Object – There needs to be much more accountability associated with the greater use of section 36 charges, particularly in terms of accountability for monitoring and research programmes and their associated budgets. An individual's consent conditions also need to be accounted for to avoid 'double dipping'.

Before supporting such an approach, INZ requires the detail around the above to be developed.

10. Iwi Rights & Interests

a. Te mana o te Wai

Support – Agreed to in LAWF, it is a useful approach to Freshwater Management, particularly given many iwi now have commercial interests and thus understand the trade-off's involved and the consequences of these.

b. Iwi & hapu Relationships with Freshwater Recognised

Conditional Support – Agreed to in LAWF but need these values should not become compulsory ones (in addition to contact recreation and ecosystem health)

c. Participation in Decision Making

Conditional Support – As per INZ RMA Bill submission there needs to be a clear line drawn between iwi involvement in the development of the draft plan (for this it would be beneficial to formalise iwi involvement through rohe agreements) and once a plan has then entered into the Schedule 1 process. This is to ensure conflicts of interest are managed. A number of iwi now have significant commercial interests.

d. Water Conservation Orders

Support – there is much that is beneficial within these changes – WCO's are an outmoded means of managing natural resources

e. Implementation Support

Object – unsure as to what this entails, do post settlement iwi with commercial interests really require a hand-out?

Principle = implementation support is either made available to all or not at all.

Discussion required around the benefits of having more organised pre-settlement iwi with which to interact versus unnecessary burden on tax payers...

f. Safe Drinking Water for Marae's

Object – particularly for iwi post settlement with commercial interests. Unnecessary burden on the tax payer.

11. Freshwater Improvement Fund

a. Broadening Criteria to Allow for Environmental Infrastructure Solutions Support