

Advisory Committee for the Waikato Regional Environment (ACRE)

C/- The Chair
Rex Bushell
7 Carisbrook Place
Rototuna North
Hamilton 3210

16th December 2014

Bill Wasley,
C-/o Janine Hayward,
Healthy Rivers Collaborative Stakeholder Group,
401 Grey Street,
Private Bag 3038,
Waikato Mail Centre,
Hamilton 3240.

Dear Bill,

The Advisory Committee for the Waikato Regional Environment, (ACRE) has noticed concern for some time among their members' environmental and scientific networks regarding the dairy conversions from forestry in the upper Waikato basin. The concern is not only that these are extensive, but that it is happening on highly leachable pumice soils. We are sure there is no need to explain the risk factors of nitrogen leaching into the Waikato River to the Collaborative Stakeholders Group (CSG) or the Technical Leaders Group (TLG).

Paula Southgate and Stuart Kneebone attended our November meeting where we expressed our concerns and raised the idea of presenting an unsolicited submission to government requesting a moratorium on further conversions in the Upper Waikato catchment until the Healthy Rivers project has had time to put a management program in place to manage the conversions environmentally and in line with the Healthy Rivers objectives.

The outcome of the meeting was that there had been general discussion by the Waikato Regional Council (WRC) with government and it was felt that this government did not have an appetite for a moratorium as it ran against the government's growth strategy.

Our recommendation was for a more formal approach by way of an unsolicited submission. One advantage of this approach is the strong argument of outlining cause and affect, with scientific endorsement. The other advantage would be that a formal written approach would expect a formal written response.

To ensure due process is followed, ACRE requests that the CSG considers this approach as outlined above. If there is general agreement among the CSG we would suggest the TLG should draw up a submission at the CSG's request to ensure a scientific point of view is presented.

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The CSG would then present a draft submission to Waikato Regional Councillors for their consideration, before being presented to government.

ACRE would appreciate viewing any draft submission and, if deemed necessary, we are happy to supply input prior to this submission being presented to WRC.

ACRE members look forward to your reply and/or answering any queries you may have.

Yours faithfully

Rex Bushell
Chair
ACRE
021-237-3857
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CC: Co-chairs of the Healthy Rivers Wai Ora Committee, C/o Cr Alan Livingston and Roger Pikia, Waikato Regional Council

CC: Waikato Regional Council, Paula Southgate, Stuart Kneebone.



Healthy Rivers
PLAN FOR CHANGE

Wai Ora
HE RAUTAKI WHAKAPAIPAI

Maniapoto Maori Trust
Board
Raukawa Charitable Trust
Te Arawa River Iwi Trust
Tuwharetoa Maori Trust Board
Waikato Raupatu River Trust
Waikato Regional Council

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www.waikatoregion.govt.nz/healthyrivers
Ph +64 7 859 0999

19 December 2014

Chair
Advisory Committee for the Waikato Regional Environment
7 Carisbrook Place
Rototuna North
Hamilton 3210

Dear Rex

Landuse Conversions: Upper Waikato

Thank-you for your letter dated 16 December 2014 expressing concerns regarding the conversion of land in forestry to dairying. Similar concerns have also been discussed by the Collaborative Stakeholder Group, in particular potential landuse changes occurring while the plan change is being developed and prior to its formal public notification under Schedule 1 processes of the Resource Management Act 1991.

Such matters have been raised with the Council through the Healthy Rivers Wai Ora Committee. Notwithstanding this I intend to place your correspondence on the agenda for our next CSG workshop in February 2015 for consideration of the recommendations you have outlined. In the interim I will forward your letter to the Regional Council's Director of Science and Strategy, Ms Tracey May and Te Rōpū Hautū, the project steering group.

Once the matter has been considered by the CSG, I will be in touch to advise the outcome of the CSG's consideration.

Kind regards

Bill Wasley
**Independent Chair: Healthy Rivers
Collaborative Stakeholder Group**

#3698909



Healthy Rivers PLAN FOR CHANGE

20 March 2015

Rex Bushell
Chair
Advisory Committee for Waikato Regional Environment
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Dear Rex

Land use conversions: Upper Waikato

At the Collaborative Stakeholder Workshop (CSG 9) held on 9 and 10 February 2015, the CSG considered the correspondence from you in respect of concerns regarding the conversion of land in forestry to dairying.

CSG were made aware that both the Regional Council and river Iwi were considering this matter and that information gathering on this matter, was being undertaken by the Council.

The CSG agreed that at this stage the matter of land use conversions and consideration of any initiatives to address such matters, between now and notification of the plan change, was for the Council and river iwi to progress.

Previously the CSG had drawn this matter to the attention of the HRWO Committee subsequent to the CSG 7 workshop. At that workshop, the CSG resolved as follows:

"That the CSG Independent Chair take the following advice to the Healthy Rivers Wai Ora Committee:

- *That it does not wish to see the future plan change undermined in the interim prior to its public notification; and*
- *That the CSG recommends that it would like to see a section 128 1(a) condition applied to any consents relating to the 4 contaminants; and*
- *That it be noted that there is a clear intention that existing consents will be brought in line with policies contained in the plan change."*

Whilst CSG appreciates the concerns highlighted by ACRE and others, the CSG will continue to focus on the tasks before it, and as required by its ToR. That is why at this stage, the matters in CSG's view, should rest with the Regional Council and its iwi partners, to pursue.

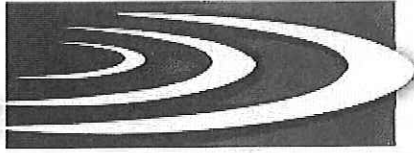
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Tūwharetoa Māori Trust Board
Waikato Raupatu River Trust
Waikato Regional Council

Finally, the CSG has requested that the information from the current information gathering work be provided to CSG.

Yours sincerely

A handwritten signature in black ink, appearing to read "Bill Wasley". The signature is written in a cursive style with a large initial "W".

Bill Wasley
Independent Chair
Collaborative Stakeholder Group



**ADVISORY COMMITTEE
for the Waikato
REGIONAL ENVIRONMENT**

C/- Aimee Christensen
Waikato Regional Council
Private Bag 3038
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HAMILTON 3240

20 October 2015

Bill Wasley
Independent Chair
Collaborative Stakeholder Group
C/O Wasley Knell Consultants Ltd
100 Spring Street
Tauranga, 3110

Land use conversions: Upper Waikato

Dear Bill

Thank you for letter of 20 March, and for your request that ACRE provide current information gathered.

We felt it would be constructive to first visit Wairakei Holdings which is managed by Landcorp and is the single largest entity involved in dairy conversions. They are open to visits and discussions and in July, provided our group with a presentation, discussion time and tour of two of their farms. At the end of which they requested feedback from us. Please find enclosed a copy of our letter to them and maps attached which contain relevant information that you may find of interest.

In our view Landcorp's management of Wairakei Holdings is impressive, demonstrating best practice or close to it. We are concerned however, that many other conversions in the upper Waikato catchment may not subscribe to Wairakei Holding's level of investment and attention to environmental issues. However this is only conjecture on our part.

Dr Alison Dewes has modelled Wairakei Holdings using Overseer and concluded that once the whole area has been converted, they will be adding another 1200 tonnes of Nitrogen annually to the Waikato River. It needs to be stressed that the area of conversions that have already been completed and those that are still in the pipe-line will exceed Wairakei's land area. A conservative estimate would be by at least four times.

Extrapolating Dr Dewes's model over the predicted 100,000 hectares, results in a further 4,800 tonnes of Nitrogen. This example alone, shows an annual increase of 6,000 tonnes of Nitrogen entering the upper Waikato River catchment. We suspect that the actual figure will, in fact, be far greater. The Waikato River, with its present loading of Nitrogen cannot absorb the magnitude of this loading increase.

It is interesting to note that the ground water Nitrogen flowing into Taupo was decreased through WRC's Variation 5, which aimed to reduce Nitrogen level by lowering stocking levels. Yet just down the road in the Waikato catchment the stock increases are extraordinary.

This is why ACRE, and others, have asked for a moratorium on diary conversions until some rules have been developed that are sustainable for all sectors, i.e. economic, social and environmental.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Rex Bushell', written in a cursive style.

Rex Bushell
Chairperson
Advisory Committee for the Waikato Regional Environment
rexbushell@gmail.com



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Kemble Pudney
Chairperson
Advisory Committee for the Waikato Regional Environment
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HAMILTON 3240

24th March 2016

Dear Kemble,

Thank you for your letter of 20th October 2015 (from previous chair Rex Bushell) and the provision of the information to CSG that ACRE had gathered regarding land use conversion in the Upper Waikato. Your letter was tabled at the 23/24 November CSG workshop for their information. As you will be aware, Dr Gwyn Verkerk is a CSG member and she continues to act as a conduit between the groups.

As independent chair of the Collaborative Stakeholder Group (CSG) I feel it is timely to provide you with an update on the Healthy Rivers Wai Ora project as we have reached another critical point in the process of the plan change.

The CSG has recently achieved a major milestone, with the presentation of their broad policy mix to the Healthy Rivers Wai Ora committee. The *Restoring and protecting our water/Te whakapaipai me te tiaki i ō tātou wai* report was received by the committee at their 22 March 2016 meeting. The committee will further consider the policy mix in June once the detail is complete.

The report describes the policies the CSG is in the process of developing, and the intent of the policies. The report is now publically available on the Waikato Regional Council web page at the following address;

<http://www.waikatoregion.govt.nz/PageFiles/28658/Restoring%20and%20protecting%20our%20water%20-%20Overview%20of%20Collaborative%20Stakeholder%20Group%e2%80%99s%20recommendations.pdf>

The CSG are now fleshing out the detail of the proposed plan change that will be recommended to the HRWO committee in June. This is a significant task given the various environmental, economic, social and cultural considerations that need to be taken into account.

Restoring and protecting our water/Te whakapaipai me te tiaki i ō tātou wai includes a range of measures to reduce contaminants entering water, while collecting the necessary information to enable allocation of responsibility for reducing contaminants in the future. It includes topics the CSG has settled on, as well as others they are still actively considering. Some of the features of the proposed plan change the CSG has agreed on are outlined below.

Everyone to be part of the solution

Catchment wide targets for water quality will apply to both diffuse (non-point source) and point source discharges.

Restricting stock access to water

- Dairy and beef cattle, horses, and farmed deer and pigs would be prevented from entering water bodies.

Limiting major land use change

- Change of land use from indigenous vegetation or plantation production forestry to animal farming or cropping, or from drystock to dairying (milking platform) would be limited.
- The net land area in the Waikato and Waipa river catchments used for commercial vegetable cropping would be capped at current hectares.

Property management plan options based on land use intensity and risk

Low intensity land use would not require a resource consent. Any land use above low intensity would have three options available, based on the level of risk present.

1. Producing a property management plan, and applying for a resource consent
2. Producing a property management plan, and being part of a certified industry scheme
3. Meeting risk factors, and not having to apply for a resource consent

Property management plans would have actions with dates attached. Landholders would need to show they are undertaking actions as agreed, and this would be audited.

Preparing for property level contaminant limits

Start collecting information from landholders and undertaking research in this plan change, so that property level limits for nitrogen can be set in the future.

The CSG is still considering and refining a number of areas, including:

- enabling provisions for the development of land returned under Te Tiriti O Waitangi settlements and multiple Māori owned land
- the outcomes expected from the proposed plan change after 10 to 20 years
- prioritising catchments to implement rules requiring property management plans
- timeline for implementation and when rules will come into force.

As mentioned, there remains a considerable amount of work to be done over the next few months as we progress towards making our final recommendations. Thank you once again for your interest and involvement in the Healthy Rivers Wai Ora project.

Yours sincerely,



Bill Wasley
Independent chair, Collaborative Stakeholder Group
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Tauranga