

# Feedback: Book 3





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Richard Alspach		<p>It is interesting to note in your preamble, that you claim this document is necessitated by the Governments NPC on clean water 2022. You will be aware that we have recently had a change of Government, and they have rescinded that National Policy Statement, as being too draconian and too removed from practical reality. They have yet to issue an alternative, so we are left with the status quo. Which begs the question, why is the NRC pursuing this policy? Wasting resource and goodwill in the process,</p> <p>It is also interesting, and a little disturbing, to note that there is so little hard data to back up the proposed policy. Nearly all of the policy direction is prefaced with the phrase "we think", which is unfortunate, because it puts the proposed policy into the realm of the speculative, rather than practical.</p> <p>I say disturbing because the NRC has been in existence for over 35 years, following on from decades of the Northland Catchment commission, surely collection of data is one of your core functions? By your own admission this has not been happening, Why? The paucity of data is certainly having a negative impact on constructive planning for our waterways.</p> <p>Here as evidence I would cite the Northern Wairoa River, certainly in the lower reaches, where we are largely reliant on anecdotal evidence. Long term residents will say unequivocally that the River is silting up and has been doing so, noticeably, for over two decades. Largely coinciding with the commencement of the harvesting of Mangakahia Forests.</p> <p>There is an irony here. The NRC may bridle at this, but the impression given by your proposed plan is that you would like to see the removal of livestock farming from a fairly large proportion of Northlands hinterland. Which presumably means you would rather it was all in forest? Either production or carbon. We know the damage that forestry can cause in catchments, (Gisborne, Hawkes Bay ??), why would you want more of it? Frankly forest harvesting can be quite destructive. There are easier ways of getting production off of hill country. It's called a heading dog.</p> <p>Northland's economy is essentially agriculturally based. Any significant land use change will have negative impacts on that economy. We have a current example of this. There has been widespread conversion of agricultural land to carbon forestry over the last few years, its effect on the landscape and the economy is already being felt. If you don't believe this, ask business in Kaikohe and Dargaville. (It is not the subject of this submission but it needs to be said, the widespread planting of pines to claim carbon credits, is effectively the Nation being prepared to sacrifice rural economies and social structures, so that it can carry on with it's addiction to fossil fuels. Bluntly it is not solving a problem)</p> <p>I find NRC's fixation with SNAs perplexing. It was a political issue in the early nineties, then again early 2000s, ten years later, and now it rears its head again. Over the decades they have been poorly mapped, poorly explained, and the strategic approach has been even worse. Over that four decade period how many SNAs have been destroyed? In my District I can't think of any. Another example of poor data driving hysterical policy making?</p> <p>I have been farming, and dealing with farmers, in Northland for over half a century. In my experience the vast majority of them look after and care for their land with an increasing sophistication and variety of method. After all not only is the farm their source of income it is also their home. The nurture is inborn, they would sometimes gladly receive advice, or education, but will resist dictate. I know that statement is empirical, but I would rather my empiricism, than data less bias.</p> <p>Did you know that Northland has the greatest number of QEII covenants of any region in the country?? I think that is something we should all be proud of, and perhaps take it as an indication that Farmers aren't environmental vandals.</p> <p>What would satisfy my concern about this draft plan? Honestly I think it should just be withdrawn and start again. What is to be gained by pursuing it? At the end of the day in its current unworkable form it will just invite civil disobedience. Which will be counter productive in terms of NRCs stated objective, and also your ongoing effectiveness as a legislative body.</p> <p>IF COUNCIL HOLDS HEARINGS ON THIS PLAN, I MOST CERTAINLY WISH TO BE HEARD.</p>
Paul Ambler	2,6,7,9	<p>- Stock set backs should not be mandatory</p> <p>- We who live on our land and farm it should determine if and how much setback we have taking into</p>

Areas of Interest			
1	The vision, objectives and/or targets for our freshwater future	7	Stock exclusion – highly-erodible land
2	Managing highly-erodible land	8	Timeframes for stock exclusion rules
3	Eliminating discharges to water	9	Managing water allocation
4	Managing exotic forests	10	Enabling tāngata whenua to practice as kaitiaki for wai
5	Managing impacts on tāngata whenua values	11	Support and funding for efforts to improve freshwater
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		<p>account soil type and likelihood of erosion on soils and land we know intimately</p> <p>-We have vested interest in keeping our land intact for our future farming generations</p> <p>-Corporate and absentee land owners do not have the same investment/stake and are not affected directly as those of us that live on and farm the land are</p> <p>-Food production for the world should not be cut back and restricted</p> <p>-We have had to purchase our farms and are trying to make enough out of our land to pay off mortgages. We already have enough challenges working with the land and weather without more hurdles put in our way</p> <p>-I believe that I am called to be a good steward of the land, water, animals, crops, trees and people that the Lord has entrusted to my care</p> <p>-The water that we have is first and foremost for our use and the use of our animals and crops</p> <p>-We have had cattle excluded from the river for more than 30 years and have just run sheep and cut silage etc on the low lying areas. Fencing by the river on the flood plain is impractical</p> <p>-We have lost areas of land next to the river through shingle not being extracted from the right places etc. Shingle extraction can stop water pushing into opposing banks. This should be able to be done easily for land owners use</p> <p>-Managed erosion (e.g. quarrying, drainage and roading) can be useful. We have a quarry that is managed well for our own use and run off goes into a settling pond</p> <p>-Stewardship/kaitiaki is inherent to all of us on the land and not exclusive to any one racial group</p>
Rowland Ambler	2,6,7,9	<p>I think the erodible soils maps and excluding stock from them is ridiculous. Most farmers put the steepest country into trees anyway as this is often the best use for it. Making changes to laws and regulations is not the way to help this as it really demotivates people. No good farmer wants to see land eroded as its taking production with it. I agree that providing resources and encouragement is a good thing but quite often it's finding time to do anything about it that is the problem.</p> <p>With these proposed changes will come massive financial implications on Northlands farmers and if these all go through I imagine there will be many farms unable to continue because it will no longer be financially viable. This affects our region hugely. Not just the farmers but all the regional towns. If farms stop operating it affects those employed on the farm as well as all the businesses that farm supported, for example; car mechanics, bike/quad mechanics, supermarkets, dairies, restaurants, pubs, accountants.... this could be devastating! As well as that all you politicians care so much about the supposed 'climate crisis' and yet if this happens, everyone has to travel further to get to shops and supplies etc. More emissions per person! And where is it you think the food will come from? Factory farms? Meat produced in a lab?</p> <p>Stock exclusion from water ways I can understand. No one wants a dirty river. But in my 30 odd years of swimming in the local river where there are dairy farms and beef and sheep farms, I've never thought that the river was polluted. Its clean. We never got sick swimming in it. I bet the rivers and streams in the towns and cities aren't anywhere near as clean as our rural rivers and streams. Because of these rules coming into place we have had to spend around \$100,000 on a new reticulated water system. That is going to take a long time to pay off, if it ever does.</p> <p>The place where I have seen the most erosion in recent times has been on the main river banks. This has happened because people don't remove the excess river shingle from the inside of bends. The river then pushes over and eats away thousands of cubic meters of good productive soil. So how about you invest a heap more money into erosion control on the river banks rather than trying to micro manage farmers who already are having a hard time making enough to support their families.</p> <p>Also any water ways running through private property should be first and foremost available for the landowners use.</p> <p>So to summarise; stock exclusion from water ways and highly erodible land should not be mandatory. It should be managed on an individual farm basis.</p> <p>Freshwater should be available for the landowners without interference from Maori or government</p>
Kevin Anderson		I listened to the online Hui last week on plans for improving water quality in Northland. Thank you for running this - it was most informative.

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		<p>I have farmed on and off in Northland since the 1970's and have seen many changes, mostly for the better.</p> <p>I think where credibility is lost with regional and central governance is when they go on about improving the soil and the water but the go-to solution is pine trees.</p> <p>I remember years ago when people were jumping on the agroforestry bandwagon planting scattered pines allowing grazing under the trees, cattle wouldn't eat the grass, it was "sour".</p> <p>I don't believe there is much about our current forestry practices that is good for the environment and, I think, farmers often see what is being planted all around them, feel the pressure to lower stocking rates and call bulls**t on the whole process.</p> <p>Most farmers have great respect for the land and I have worked with many who try to improve quality or reduce farming impact by judicious fencing and planting programmes at their own cost and effort, despite every stock unit you can run being valuable.</p> <p>Perhaps the ETS payments could be lowered for Pines (and any mono cropping forestry) and boosted for areas of native multi species forests to make that a more profitable exercise. I am sure some farmers would look at locking up some marginal areas for a better return on native bush.</p> <p>For what it is worth I thought I would jot down my observations.</p> <p>Good luck with this process, I realise central govt sets these lofty targets and leave local govt to wade through the details so I don't envy your mission - noble though it may be.</p>
Nellie Andree	2,6,7,8	<p>I am totally opposed to the proposed distance from waterways for stock and the stock exclusion from erodible land. The increasing of stock distance from waterways would create a fire hazard, cause vegetation build up and clog up the water system. It would make our farming operation unviable and come at a great cost in time and money and a loss of income.</p> <p>Is the council intending to compensate the landowner on an annual basis for loss of income, money and time outlaid and reduce the rates accordingly? Of course not!!</p> <p>There seem to be some left-wing zealots in the council that are most probably non rural, with a green agenda that are pushing their views of a few and trying to change many, without much forethought, insight or intelligence. Hopefully the next council members that make up the NRC will be working with the voters and not against them. Spend ratepayers' money and time on real pressing issues and not on self-motivated egotistical pie in the sky schemes. Get REAL</p> <p>a concerned ratepayer opposed to the proposed proposals</p>
Till Andree	6,7	<p>I strongly oppose your plans to increase by 300 percent the stock exclusion zone from waterways.</p> <p>I also strongly oppose the proposal to exclude stock from hillsides. Those proposals will increase fire risks, create problems with undesirable weeds and negatively affect our waterways.</p> <p>These proposals will also have a very negative effect on our farming viability, not only on an immediate cost to fence the land, but also a long term ongoing negative impact on our financial returns.</p> <p>It will make our small farming business unviable and uneconomic. Is the council aiming to reduce rates in a proportional manner and compensate the financial losses every year?</p> <p>The council I believe needs to do a cost analysis of all these proposals, the council once again is showing itself to be working unilaterally with a holier than thou attitude and not working with the ratepayers.</p> <p>This is unacceptable and must be stopped. Shove it where the sun don't shine is my advice.</p> <p>Cheers without regards. A disgruntled ratepayer</p>
Tim Antonio	6	<p>We have a Fonterra Farm Environment Plan which has looked at areas of risk to sediment and nutrient loss, this has helped us develop plans to make our farm even more environmentally friendly.</p> <p>Currently we view ourselves as custodians of the land and want to have as smaller footprint as possible. The farm gate is often open to various community activities such as horse hunting and trekking.</p>

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		With our current management on farm, and respect for the land we feel that this draft plan is overstepping the boundaries of control of our farm. We continue to do our very best with the land to ensure we have a healthy farm to pass on to our kids and grandkids.
Janet Askew	2,3	My personal concern is a proposed subdivision in which work has been started at 11 Pātiki St, Riverside. This is on steep unstable land upstream of the town basin and directly above my property at 9 Pātiki St.
Allison Atkinson	11	<ul style="list-style-type: none"> <li>•Community consultation from early stages of any fast-track projects to ensure best practise is implemented on the ground to guarantee freshwater streams are safe guarded.</li> <li>•Investment in roadside rubbish disposal (- Spot fines - Signage re fines) for people dropping rubbish on roadside.</li> </ul> AND council sponsored regular cleanup so that this rubbish does not pollute our waterways and ocean.
Olivier Autet	1,2	<p>(*1: Technical units used to measure sediments in flood &amp; erosion events. *2: Wording " nutrients " in running waters from farms and commercial &amp; industrial sites)</p> <p>1: When quantities of sedimentary run off from land to rivers to sea are mentioned in documents, the unit kt appears for Kilo-tonnes, but very few people actually realise/comprehend that 1kt means 1 000 000 (1million) kg of sediment! I suggest the kt "unit" be changed to 1000 of Tonnes of sediments/silt/etc.</p> <p>2: Even though a PC language is to be used nowadays it seems not correct to call " nutrients" elements that are present in waters due to poor absorption, over dosage or drift/dispersion during windy or other wrong conditions while applying chemicals or minerals on farm land/orchards, along road kerbs or even in public areas/ reserves. Technically those elements, or even traces of elements, become pollutants.</p> <p>I suggest the wording used in documents relating to fresh water in the future to be addressed as in calling a cat a cat for clearer understanding of the origin of some problems.</p>
Sheryl Bainbridge	6,9,10	<p>I totally oppose the 5m and 10m setbacks proposed. They will have such an adverse impact on farmers on top of the already stringent requirements currently in place that many will be able to continue to carry on their business. This in turn will adversely impact the communities they support including businesses, volunteer organisations and sports groups.</p> <p>Your proposals are in blatant defiance of the direction that the government is now taking. Should you find yourselves facing legal action for failing to adhere to the social and economic well beings that you are required to consider under the Local Government Act 2002 who do you think is going to pay for that? Not the ratepayer I hope.</p>
Balance Agri-nutrients (Dominic Adams)		<p>Ballance Agri-Nutrients (Ballance) thanks the Northland Regional Council (NRC) for the opportunity to make this submission on the proposed Plan Change.</p> <p>We are fully supportive of improving practices with the intent of providing greater protection to the health and quality of freshwater. This provides significant benefits for people as well as the environment.</p> <p>Ballance provides this short submission with the intent to assist in the development and refining of the proposals. A company overview of Ballance is provided as an attachment to this letter.</p> <p>Submission points</p> <ol style="list-style-type: none"> <li>1. C.6.9.3. refers to an out of date Code of Practice for Fertiliser Management. The current reference is to the 2013 version. The correct reference is: Code of Practice for Fertiliser Nutrient Management (Fertiliser Association, March 2023).</li> <li>2. We support the discharge of fertiliser following the risk-based guidance provided in the Code of Practice.</li> </ol> <p>Thank you once again for the opportunity to comment on the proposed amendments. We would be very pleased to engage in further discussion on these submission points should you wish.</p> <p><i>(1 page company overview available if required)</i></p>

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Tara Barnden-Brown	1,2,4,6,7,8,9	<p>You are over regulating primary industries to the point of collapse. Not only are diesel and RUCs costs through the roof, you now propose eliminating approximately 250,000 hectares of northland farm land (40%) under an absurd blanket rule which helps neither the environment nor the community. How, or more appropriately, who, do these regulations help? Certainly not us.</p> <p>If you want to have a valid argument you must show evidence.</p> <p>A blanket rule cannot be applied to all Northland farms, this is absurd. We are farmers, working on and with the land.</p> <p>You must show evidence on every proposed site of erosion and water contamination. Clear evidence that in those particular sites, stock exclusion is recommended.</p> <p>And then what about compensation? Are we supposed to foot the bill to re fence our waterways? We've already fenced and planted and created wetlands that we are proud of. We encourage bird life and native trees and clear running waterways, because we love our land.</p> <p>But as in all things, there must be balance, and you are tipping it, pushing it right over.</p> <p>Do not plant our beautiful country in pines. Your great grandchildren will be devastated when the land you have ordered be planted in exotic forests for a made-up money grabbing scheme (carbon credits) is robbed of fertility.</p> <p>The tourism industry will sob when there are no more rolling green hills to look at. When the creeks and rivers are so thick with gorse that you forbid us to spray, that this perfect water you dream of is inaccessible.</p> <p>We all wish to work together to better our country, but not at the cost of our entire industry. Not if we are not moving forward together. This is not you vs us. This is us, together.</p> <p>I strongly oppose this Freshwater Plan, and strongly recommend you all put on some gumboots and go and understand the people and the land you are supposed to be representing.</p>
Tom Batchelor	1 - 9 & 11	<p>I want to see consideration of:</p> <ul style="list-style-type: none"> <li>• Clear target attribute states for nitrogen and phosphorus that protect ecosystem health (not just 'toxicity') and connecting these to limits on resource use. It appears these are missing from the draft plan and this gap needs to be addressed.</li> <li>• Nitrate-nitrogen in groundwater with a target of less than 1.0 mg/L nitrate-nitrogen.</li> <li>• New rules requiring stock to be excluded from areas of both high and severe erosion risk.</li> <li>• Setbacks (&gt;10m) to provide enough space for riparian vegetation to establish around waterways.</li> <li>• Consent for dairy effluent discharges to land.</li> <li>• Prohibiting new farm dairy effluent discharge to water.</li> <li>• Prohibiting new wastewater treatment plant discharges to water.</li> <li>• Prohibiting domestic wastewater discharges to waterways.</li> <li>• Prohibiting wetland drainage and clearance.</li> <li>• Requiring stock exclusion from wetlands.</li> <li>• Adding policies to the plan that would encourage wetland restoration.</li> <li>• Mapping and monitoring wetland extent.</li> <li>• Providing a wetland condition index.</li> <li>• Prohibiting clear-felling of forestry in high-risk or steep areas.</li> <li>• Using short-term consents of &lt; 10 years for all water takes.</li> <li>• Having a robust allocation system for nutrient leaching, which should include limits on fertiliser use and stocking rates in degraded catchments.</li> <li>• Prioritisation of nature-based solutions over engineered solutions when making decisions on flood protection</li> <li>• Tighten regulations of activities in the beds of rivers, such as gravel extraction.</li> <li>• Include target attributes for water quality in estuaries and coastal areas.</li> </ul>

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Bay of Islands Maritime Park Inc (Chris Richmond)	1 – 3, 6 – 8 & 11	<p>Bay of Islands Maritime Park Inc includes the catchment working group, Living Waters BOI-Wai Ora.</p> <p>We have commented extensively on documents and workshops associated with the development of the RPS for Northland, the Northland Regional Plan, the Waitangi Catchment Plan and others since our formation in 2009, so we are very familiar with the freshwater (and other RMA) issues of the Region. We have also undertaken serious work with ecological restoration of a number of smaller catchments in the Bay of Islands, including the Tangatapu/Pukenui floodplain/eroding hillsides and the Pipiroa &amp; Te Wahapu stream catchments and floodplains, so we are familiar with the challenges involved in fencing, native planting, weed control, flood management and drainage to mitigate the impacts of land use upon water quality and natural character.</p> <p>I have personally worked on water quality and catchment management issues in most North Island regions since 1973, so have a good understanding of the challenges that Northland has relative to other regions. We agree that the primary water quality challenges that Northland catchments face are suspended sediment/turbidity, inadequate riparian vegetation/shading and faecal contamination, although some lakes and estuaries are also challenged by nutrient contamination/eutrophication (eg Lake Omapere and the Kawakawa/Taumarere estuary) and most rivers fail to meet aquatic invertebrate health standards.</p> <p>Overall we consider that the Regional Council has undertaken a diligent effort in interpreting the requirements of the latest (and current) National Policy Statement for Freshwater Management, including Te Mana me te Mauri o te Wai, for the environmental and economic challenges of Northland. We appreciate that this has involved a careful balancing of competing interests to achieve an efficient pathway towards meeting the defined Vision, Objectives and specific Targets in the draft Plan, which BOIMP does support.</p> <p>In general we endorse and support the draft new rules to: Protect highly erodible land; Keep stock out of waterways; Eliminate or reduce discharges of contaminants; Protect wetlands; Control exotic forests; Expand requirements for assessing impacts on tangata whenua values; Allocate water for environmental enhancement and to recognise tangata whenua relationships with water.</p> <p>With regard to Council's steps towards determining Freshwater Management Units for water quality management, we suggest using an integration of the original catchment/harbour-based 13 FMUs with the subsequently proposed outstanding/coastal/small/large river typology (noting that many of the small rivers are also coastal rivers, which means that the classification does not meet the test of comprehensively exhaustive but mutually exclusive classes).</p> <p>It will be essential to define the overall outcomes (objectives) by catchment as it is the downstream estuary or lake that integrates all of the upstream influences, but it is also necessary to set in-water standards for value attributes based upon the relevant lake or river type.</p> <p>Regarding the timeframes needed to improve freshwater quality, ecology and natural character, we do note that the basic science guiding the actions needed to mitigate the impacts of land use and discharges on freshwater and estuarine ecosystems has been known since the 1970s and has guided comprehensive catchment management schemes since then (e.g. Upper Kaituna Catchment Scheme 1975 and various Waikato Valley Authority catchment control schemes in the 1970s and 1980s). Pushback from various sector interest groups has delayed or retarded effective action in Northland and other regions for up to 50 years, although the hapu-led and Crown/Council-supported Kaipara Moana catchment restoration scheme does stand out for its initiative in Northland. Accordingly, we consider it is appropriate to consider equally ambitious timeframes for restoring te Mana o te Wai in other Northland catchments.</p> <p>Towards that end we support the general intent and direction of the Draft Freshwater Action Plan (wai-it-matters.nz), especially for further Crown/Council supported catchment management plans. Naturally, we would particularly support further investment in repairing the most degraded catchments discharging into the Bay of Islands. While some progress has been made with the Waitangi, Wairoa, Pipiroa and Tangatapu catchments, the catchment contributing the most contamination to the Bay of Islands is clearly the Kawakawa/Taumarere, which should be the next priority for the Regional and District Councils, as well as the Crown and the associated landowners and community.</p>

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		<p>Indeed we have a copy of a Catchment Management Plan authored in 2013 by your current deputy Chair, Tui Shortland, entitled Ko Ngati Hine Pukepukerau, Taumarere Catchment Management Plan, August 2013</p> <p>Urgent progress is needed on the further elaboration and implementation of such a plan in partnership with the Crown, Councils and the community.</p> <p>Thank you for your attention to the points raised in this submission on the draft Plan and Plan Change. We will provide more detailed input to the anticipated Proposed Plan Change after the next stages of legislative and NPS changes.</p>
Michelle Beard	1, 2, 5 - 7, 9 & 10	<p>Your draft plan is so out of touch with reality and the real world, your planners and policy makers need to go out get a real job in the private sector. The new government has signalled the rules around freshwater will be rewritten, NRC should stop all planning work on freshwater regulations until the govt puts the new rules out. This bull headed blundering ahead is a huge waste of ratepayers money.</p> <p>We are farming sheep and beef and also lease a significant amount of multiple ownership Maori undeveloped land. NRC proposes introducing restrictions to highly erodible land (with a 25 degree slope or more. These rules will make a large portion of the land we lease unproductive and reduce our carrying capacity thus reducing our income, and make some of our lease land un-leasable.</p> <p>Farmers are able to identify areas of concern on their own farms and mitigate concerns through practices that suit their own farming systems. We are responsible enough to exclude stock at certain times of the year where it is detrimental to pasture growth and possible erosion.</p> <p>NRC proposal rules for excluding stock from waterways go way beyond national legislation. With costs estimated to be between \$8,200 and \$24,500 per farm annually for fencing plus additional costs associated to riparian planting this is ridiculous and will make us uneconomic. What is the definition of a waterway? A large drain/ small stream?? 20m each side of a stream or drain is excessive and requiring riparian planting only adds costs and nothing to help farmers become more efficient. Undeveloped māori will never be developed under these rules. We would probably pull out of our māori leases.</p> <p>Stock exclusion requirements should be flexible for farmers to adapt and innovate to meet the multiple demands on their business</p> <p>NRC proposes changes to water allocation including that 20 percent of unallocated water is to be used for environmental enhancement, marae and papakainga, or developing Māori land. The NRC must allow for a reasonable allocation of stock drinking water as required under the RMA. Stock drinking water must be readily available year-round and allow for periods of drought and low water flows.</p> <p>There is no way Maori should be singled out and gifted water (and be able to charge other consumers) which is owned by everyone. This proposal is racist and divisive.</p> <p>If these proposals are passed a significant portion of farming in Northland will become uneconomic. You will destroy the economic base that of a lot of the smaller towns in northland that rely on, which will affect everyone, including māori.</p>
Donna Beatson	12	<p>Consultation with tangata whenua</p> <p>When are we going to have genuine engagement not just check box ticking?</p>
Jan Beatty	2,4,6,7	<p>Below is a small amount of how the freshwater plan if implemented would negatively effect our local community and farming /food production.</p> <ol style="list-style-type: none"> <li>1. A proposed Consenting process which takes both time and money. Not only costing the food producers money but also time better spent on farming and producing the food you eat.</li> <li>2. This lowering of production leads to lower exports which means less money in circulation eventually effecting everyone.</li> <li>3. Reduction in productive land eventually will lead to less rural population who would want to go into farming for no return??</li> <li>4. The point you are missing is that we have paid money for the land we farm to the best standard that we can because if we don't look after our asset what do we have ??</li> <li>5. The proposed set backs from waterways takes out too much land this allows weeds to grow and eventually blocks off the water way. As for the councillor who suggested we manually weed it come</li> </ol>

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		<p>and see how that goes I have in one place 2 k's of river bank which I would like to see her weed.</p> <p>6. The hill country degree of land retirement I would suggest was for the areas of high country hills where there is intensive beef farming with large animals.</p> <p>Forestry</p> <p>You as NRC have allowed large blocks of good farm land to be planted in pine trees these are the worst polluters of water, they do not regenerate growth of native plants in the undergrowth NOTHING likes to grow under them. Forestry has been allowed to spray out whole farms before planting right down to the waterways without been stopped. They plant right down to the waterways without been stopped.</p> <p>Pine trees have shallow roots hence more prone to falling over meaning there is sediment to join the flood water and the worst part of the this they also become highly inflammable we now risk the native bush on the Tangihua been wiped out.</p> <p>So please apply common sense and see this is an unworkable plan that has no financial benefit to the communities of Northland.</p>
Whiti Bedggood		<p>Ki tooku whakaaro e pa anà mo te wai e penei ana ko wai tatou tangata kite whaka takoto ture mo te wai ko tenei wai waiho kaua e whai korero na te aha ai na te mea e oranga tuturu mo nga mea katoa e noho ana I runga i te mata o te whenua koi na Ki ahau kaua rawa e paapaa tu Kia ora.</p> <p><i>Using Google translate - I think it's about water like this, who are we who are the people who make laws about water, this water should not be discussed because it is the life of all that lives on it. on the face of the sharp earth for me, don't even stop. Live.</i></p>
Monique Bedim	2,3,4	<p>Thank you for the opportunity to submit on the draft Freshwater Plan for Northland.</p> <p>Over the last 50 years PF Olsen has become New Zealand's most trusted forestry services provider. Our team has grown to include over 150 of the industry's most talented people from forest and harvesting managers through to planning and environmental consultants.</p> <p>PF Olsen is a market leader in the forestry sector across both Australia and New Zealand. We plant 40% of all new forestry in NZ, manage over 160,000 ha in NZ as well as over 212,000 ha in Australia. We also manage the largest harvesting portfolio in NZ and Australia at 2.4million tonnes and 2.7 million tonnes respectively per annum. PF Olsen amongst other place, manages a significant amount of forests in Northland region.</p> <p>PF Olsen has a number of concerns over the draft rule changes but is specifically concerned over the changes to C.8 Land Use / Disturbance and, in particular, C.8.3 Earthworks and C.8.4 Vegetation Clearance. We have worked with the Northland Wood Council (NWC) on submitting the draft Plan Change and are lodging this submission to support the NWC submission. The NWC submission provides the details of our concerns, which can be summarised as:</p> <ul style="list-style-type: none"> <li>•The rules of the draft Plan Change will have significant economic impacts on the Forest Industry, its downstream supply chain, and the wider community;</li> <li>•The rules as they relate to forestry are not evidence-based;</li> <li>•The rules as they relate to forestry are not fair, reasonable, or practical;</li> <li>•The rules as they relate to forestry are likely to render interests in land incapable of reasonable use and</li> <li>•Will result in unintended consequences.</li> </ul> <p>PF Olsen believes that the National Environmental Standard for Commercial Forestry provides a comprehensive and nationally consistent framework for managing the environmental risks associated with commercial forestry that the Council can rely on without the need to introduce a new suit of rules that are unlikely to be efficient or effective.</p>
Andre Belami	1, 5 - 8	<p>Objectives/targets- it's in my opinion another SNA approach In a different form.</p> <p>Managing tangata whenua - Remove Te man's o te Wai it's 2024 , no more Stone Age Voodoo please! If Māori want to do so it's okay, but don't lump everyone else in to it!</p> <p>Stock exclusion all 3 forms - Who is paying for the fencing ? Who is going to compensate for the loss of income and land use?</p>

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		<p>I think it's only fair of me to ask, why we have a Council knowing Full well that the far north is Farming, Horticulture and Forestry is undermining us.</p> <p>I hope better solutions will be found! What I can see so far is disappointing and quite obvious Agenda driven.</p>
Baden Bickers	2, 6 & 7	<p>We have reviewed our farm on the proposed slope map. We have identified that the majority of the risk areas already have mitigations in place. For example, fenced off bush areas around steeper areas, farm water supply dams that act as sediment traps, and run off areas that are in grass species.</p> <p>Currently we have a farm environment plan through Fonterra, we would be supportive of this plan being the basis of freshwater management plan for the farm. This would avoid duplication, save time and reduce financial cost associated with multiple plans doing pretty much the same thing. We would prefer this as a management option over having to have resource consents to run our farm, or areas of.</p> <p>Dams and more significant water ways are already fenced off. We have plans for more fencing as per our FEP. The incentive with KMR funding for retiring steeper areas is appealing, and an avenue we will pursue.</p> <p>We are not in favour of generic extending the setbacks from waterways to 5 or 10 metres. In places that have entry points into the water way there is often some filtration through grassy vegetation already, but land adjacent to a water way that doesn't directly drain into it shouldn't require a large setback. These setbacks should be determined by land contour and could be discussed with our Sustainable Dairy Advisor to make sure we are getting maximum benefit.</p>
Chris Biddles	2, 6 & 7	<p>I am aware that this Draft freshwater plan change was started before the change of Government. The new Government have stated that there will be changes to the requirements for freshwater plans.</p> <p>I question why the NRC is pursuing a plan that is likely to be in need of alteration once we know the new Governments plans. It seems to me to be a waste of resources and money by a council who is trying to reduce costs. The plan should be withdrawn immediately.</p> <p>I hope the following sounds familiar to the NRC people reading this submission.</p> <p>Working together to create a healthy environment, strong economy and resilient communities. A STRONG AND SUSTAINABLE REGIONAL ECONOMY. A sustainable economy supporting a healthy standard of living and wellbeing in Te Taitokerau.</p> <p>The above was part of your mission and vision in the 2021-31 plan. It is my belief that the vision of that period should still be a priority for you. Introduce your freshwater plan as it is in its draft plan and you will be unable to achieve that vision. A sustainable standard of living will be out the door for a huge number of farmers in Northland. A strong and sustainable economy in Northland will be impossible with the huge loss of jobs and loss of viable farms because of this outrageous freshwater plan.</p> <p>The majority of Northland is serviced by small towns. These towns will be under huge financial pressure with the job losses from farming, including farm owners who will have to walk away from there uneconomic (caused by the freshwater plan) land.</p> <p>You want trees planted on highly erodible land 1 and 2. I suggest to you that trees will cause more damage to freshwater, particularly after harvesting, than livestock farming.</p> <p>I asked your employees at the Northland field days where the data was that supported the planned changes. They consistently said "we think". I don't actually want to know what your employees think. I want to know that they can back up all their writings with sound data, it would appear they cannot.</p> <p>Our farm has approximately 20 to 25% of the currently productive land under your grade 1 and 2 erodible land. Much of this is in sand country that has no water way within kilometres of the supposed erodible land. In areas that do have water flowing we have sediment traps stopping any sediment from reaching neighbouring properties.</p> <p>The set back distance for fencing water ways also has the potential to cause financial and management problems.</p> <p>Should you introduce this plan we will have to destock to such a large degree that at least one employee will be gone. It is most doubtful that the farm will survive economically and will be extremely</p>

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		<p>hard to sell. So, after 50 years of farming this land, we are likely to be forced to exit farming with a probable sale that would not cover our mortgage.</p> <p>I have spent a good part of the last 40 years helping to make Northland a place where people want to come and live. The NRC is about to do the complete opposite should they introduce this plan. We may as well let the Government know we will not need the 4-lane highway, there will be no one here to use it.</p> <p>The freshwater plan in its current form is destructive to Northlands economy, will lower the standard of living of most Northlanders and is extremely irresponsible.</p> <p>The plan needs to be withdrawn.</p> <p>I have submitted a submission on the draft freshwater plan. I wish to be speak to my submission if the NRC allow for face to face presentations. There was not a box to tick regarding this.</p>
Kim Biddles	1, 2, 6, 7 & 10	<p>When I first read some of the proposed rules and regulations in the Freshwater Plan I could not believe that these proposals were agreed to by the farmers on the NRC. To make matters worse when the NRC had a reshuffle of the committee members have kept all the proposals on the table I voted for John Blackwell instead of Penny Smart because I believed his farming values were better suited for our farmers. I now think that was a mistake. It is not the job of NRC make absurd regulations that will ruin farming in the north. My son is on our main farm on the Pouto Peninsula .If this plan goes ahead he will lose half the grazing of the farm. I have said to Sam that all farmers in the north must stand together and bury this plan Our rural towns rely on farmers for their existence. Let's hope that NRC members see some sense and withdraw this plan</p>
Bruce Bird	1 - 4, 6 - 10 & 11	<p>I fully support the draft freshwater plan proposals. I believe we need to get back to swimmable rivers and reduce sediment loss.</p> <p>I believe we should be returning highly erodible land especially land over 35-degree slope. Given the current threat of climate change more severe weather events will lead to slips on this steep land. While exotic forestry is a way to get an economic return from this land, we have all seen the effects of harvested forestry land in the East Coast last year.</p> <p>I agree with the plan to have a 10m exclusion zone from waterways on average. Where possible this should be fenced and planted to help filter the runoff. we should also exclude stock from wetlands and stop any wetland drainage, in fact we should be encouraging wetland restoration as wetlands are more valuable to absorbing carbon than forestry and New Zealand has lost 95% of its wetlands. They are also hugely important for biodiversity.</p> <p>I believe we need tighter controls on wastewater discharges to water. this will reduce E coli and other bacterial an viral loads on the rivers and lacks as well as nitrogen and phosphorus loads. this will help with reducing algal blooms in lakes and improve the safety and clarity of rivers.</p> <p>We certainly need more controls on exotic forest near our dune lakes. These are a very rare phenomime and not found in many places in the world. Therefore, we need to protect these and the wildlife that lives in them.</p> <p>I agree we need to have tangata whenua involved in freshwater management. They have knowledge and a understand the value of healthy water.</p> <p>Finally, many of the draft plan changes will be costly. However, given the effects of climate change it will be more costly if we do nothing. Therefore, ways need to be found to support landowners fund these changes. Otherwise, rate and taxpayers will be left with the bill for clean p which is currently happening with the effects of the severe weather events of last year.</p>
Kelly Boaz	5	<p>In a nutshell dairy farming is being destroyed for us. Farming is our passion but due to the never ending changes in regulation we are being forced to consider other career options. We have little faith that the council actually knows what it's doing and should have this level of authority over land owners. It is worrying.</p> <p>Nothing we do ever seems to tick the box. The constant need to change is exhausting. You wanted stock excluded from the waterway. We fenced them off. You wanted them planted. We planted them.</p>

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		<p>You changed the definition of a waterway. We fenced that off too. Now you want to extend the distance. At who's cost!!!!</p> <p>It is evident that we really don't have control over many aspects of our business between Fonterra and the council. In times of crisis in the farming community all that was offered was counselling and financial planning when that was nothing of value to farmers who had no water to give to stock. It was an embarrassment. It was the local community that rallied to support each other.</p> <p>We lived in Australia for 10 years and were excited to move home and show our children beautiful NZ. But really it is not the same country we grew up in. Instead of being supported by council or Fonterra we get penalized for the smallest thing. We constantly debate which country our children would be better off in.</p> <p>Fresh water is important and we love the land and the nature and do everything in our control to better it. I would drink from our waterway but you'll never see me drink water from a stream near town. Dairy farming should not be the focus all the time.</p> <p>Lifestyle and beef blocks are not held to the same high standard as dairy farmers. We are surrounded by dairy farms that have sold and are now lifestyle blocks who's stocking rate can be excessive and who's stock graze waterways and aren't subject to the same scrutiny.</p> <p>Something needs to change.</p> <p>The increasing cost of farming, the regulations and constant scrutiny and public disgust in farming fuelled by media has forced many farmers to sell either to lifestyle, beef or pines. The Industry is falling apart.</p>
Clare Bolesworth	2, 3, 6 & 7	<p>I am lucky enough to horse trek, lots of big country in Northland.</p> <p>I see massive destruction by milling pines, slips, topsoil removal, all creates water pollution. The rubbish left behind from milling. Pine tree roots are too shallow and too soft to hold steep terrain together. Good hills with decades of stability, destroyed within 25yrs of carrying pines. Pines create rubbish and soil washed away into waterways.</p> <p>Forestry on steep hills and around water is a bad idea.</p> <p>Farmers should be rewarded for long-term native planting around steep slopes, natives are so much more stable and long-term. Then farm tracks though to enable stock to access though to flatter grazing grass areas. Providing lots of shade and stability. If there is shade stock don't stand in the waterways to cool down. In shady farms, we never see stock in waterways.</p> <p>Smaller paddocks can fence waterways relatively easy. But the reality of big farms is waterway everywhere 100s of acres within their 1000s of huge grazing paddocks. Often down hills and through valleys that would be impossible to fence. Those places have the most amazing shiny healthy cows, often put down to the fresh clean water access. So waterways clearly aren't being polluting by cows there.</p> <p>Encourage Farmers to protect marsh lands and plant natives for shade and erosion protection, then stock damage is minimal.</p> <p>Pine Forestry should not be our future.</p> <p>Waterways along parks and roads are filled with rubbish for homes and small businesses. Dumped because tipping fees are stopping the less environmental people in NZ. Bring back inorganic rubbish collections and open tips to take large rubbish brought in for free, so much better for are environment.</p>
Bruce Bower	6 & 9	<p>The commercial needs are not taken into account with this proposal change in managing water allocation. Fresh water takes precedence on the human and animal health and welfare.</p> <p>Have already proactively fenced off all our waterways to prevent discharge into water.</p> <p>We have a Farm Environment Plan worked through with the Fonterra Sustainable Dairy Advisor.</p>
Neville Bowler		<p>We are farming 216H approx., 116H is steeper hill country and 100H easy country. We purchase 100 weaners annually, of which 50% are sold in the spring with the remaining kept on to fatten and to kill as 2-year olds. We run 450 breeding ewes on the hills along with 20 breeding cows. All sheep go to the terminal sire and lambs are sold as prime fat lamb. We successfully wean and kill at 150%.</p>

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		<p><b>Stock exclusion – from waterways:</b></p> <p>NRC is proposing rules for excluding stock from waterways that go beyond national legislation. They are looking at a setback of 3, 5 or 10m for all permanent and intermittently flowing rivers, streams and lakes regardless of slope. They are also recommending that these setback areas would be riparian planted. Learn more from here: Northland Regional Council Consultation document: Stock Exclusion</p> <p>B&amp;LNZ's position (read more in our submission): B&amp;LNZ is concerned that NRC is going far beyond national legislation and is applying a one-size-fits-all approach that makes little sense in terms of managing risk on individual pieces of land. Stock exclusion requirements should be flexible for farmers to adapt and innovate to meet the multiple demands on their business. Blanket provisions that do not account for issues facing areas of high slope do not meet this requirement.</p> <p>B&amp;LNZ does not agree that sheep should be included in stock exclusion regulatory requirements. Sheep do not have a natural tendency to stand in or disturb stream margins or beds. Therefore, the additional cost of multiwire fence is a costly exercise to being little environmental gain. A farmer would be better to invest in something like stock reticulation infrastructure to ensure sheep have access to drinking water outside of rivers, stream, and lakes. These decisions are best made by the farmer through a Farm Environment Plan rather than blanket provisions.</p> <p><b>How far away from waterways should stock be kept?</b> 3m.</p> <p><b>Should an averaging approach be used to set setback distances?</b> Yes.</p> <p><b>What should the rules be for excluding stock from wetlands?</b> All wetlands would have to be judged case x case, some will have a nit impact, some zero impact. Should stock exclusion be extended to apply to other animals? No. Sheep do not have any dramatic affect on waterways, in fact they help by preventing weed growth (which would have to be controlled x spraying. They (sheep) do not have a natural tendency to stand in or disturb stream margins or beds.</p> <p><b>What timeframes are feasible for any new stock exclusion rules?</b> There needs to be much discussion first, at least a 10 year plan.</p> <p><b>What resources will be required to complete stock exclusion of waterways on your farm?</b> All the easier country has been fenced, steeper country would be impossible to fence and would have to be retired.</p> <p><b>Will the requirements of excluding stock from waterways prevent you from completing other environmental work on farm?</b> Yes.</p> <p><b>Have you already excluded stock from waterways?</b> Yes, on all the easy country that was possible to fence.</p> <p><b>Any additional feedback:</b> There has to be a long term agreement in place so that "a change in government" cannot make further changes or reverse decisions already made – this would have a huge effect on the farmer and in turn the economy.</p> <p><b>Stock exclusion – highly erodible land:</b></p> <p>NRC is proposing rules to exclude stock from highly erodible land. NRC have identified that erodible land with a slope of 25 degrees or more accounts for a significant amount of sediment within waterways. To mitigate this the NRC is proposing to exclude stock:</p> <ul style="list-style-type: none"> <li>On land with a slope of between 25 and 35 degrees by 2040, and</li> <li>On land with a slope of greater than 35 degrees by 2035.</li> </ul> <p>Learn more here: Northland Regional Council Consultation Document: Stock Exclusion</p> <p>B&amp;LNZ position (read more in our submission): B&amp;LNZ does not support the blanket retirement of land. B&amp;LNZ supports farmers being able to identify areas of concern on their farm and mitigating concerns through practices that suit their farm system.</p> <p>Excluding stock and/or planting pine plantations is not the only answer to preventing erosion. Orth techniques include grazing management, silvopasture techniques, and managing stock in adverse weather events. These can all be identified and actioned with a Farm Environment Plan.</p> <p>B&amp;LNZ is also concerned about the unintended consequences of retiring land from sheep and beef farming. This includes issues associated with converting land to pine plantations, the spread of exotic</p>

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		<p>weeds and pests, increased fire risk from ungrazed pasture, and the loss of rural communities. Farmers should not be required to retire large areas of land while still needing to manage the costs of this retired land.</p> <p><b>Should stock exclusion rules apply to highly erodible land (land steeper than 25 degrees)?</b> Not for sheep – if we had to exclude all stock from land 25 degrees, we would lose half our farm.</p> <p><b>Do you think highly erodible land should be retired?</b> Not necessarily, no one size fits all here, farms should look at case x case.</p> <p><b>Looking at the following map how is your farm impacted? And how much of your farm would need to be retired? Click here for map.</b> Our farm is impacted badly, over half the farm would need to retire, funding should be available to retire and plant, farmers will not be able to afford to do this without help.</p> <p><b>How badly will retiring highly erodible land impact your farm system?</b> Over half our income is wiped out by these proposed changes.</p> <p><b>What resources will be required to complete stock exclusion of highly erodible land on your farm (labour, time, costs)?</b> There are small patches on the easy country, that have already been fenced off (waterways) the steeper hill country would need to be retired and planted.</p> <p><b>Do you currently have strategies in place to manage erosion? E.g. tree planting or stock placement during adverse weather events.</b> Yes we do. Cattle numbers reduced to 20 tidy-up cows, running 99% sheep. Fenced off all the waterways on easy country o 3m+ boundary, put in circulated water, pumping water from tanks to many troughs that we have put in. Culverts have been put in place where water flows at main crossings. “Cut-offs” added to tracks so water flows off the track and into the paddock.</p> <p><b>Any additional feedback:</b> Certain land should be recommended for planting and be allowed to be purchased x forestry and planted, productive land should not allowed to be planted. This means the right areas will be purchased and planted, while better farmland stays producing beef and lamb. Livestock companies, shearing gangs, rural communities and schools will all be affected by these decisions.</p> <p><b>Water allocation</b></p> <p>NRC is proposing changes to water allocation. They are proposing that 20 percent of unallocated water is to be used for environment, marae or developing Maori land.</p> <p>Learn more here: Northland Regional Council Consultation document: Targeted Water Allocation Policy.</p> <p>B&amp;LNZ position (read more in our submission): NRC must allow for a reasonable allocation of stock drinking water as required under the RMA. Stock drinking water must be readily available year round and allow for period of drought and low water flows.</p> <p>With the changes proposed for stock exclusion many sheep and beef farmers will be required to invest in stock reticulation systems which in turn may require more investment in, and consenting of, water storage and allocation, which the council needs to be aware of.</p> <p>NRC needs to ensure it understand how various policies being proposed work together, to avoid unintended consequences. Additionally, water quantity policies must allow for building resilience to climate events and allow for reliable water sources into the future.</p> <p><b>Do you have any existing challenges with your current water supply?</b> Yes, slow running during dry season.</p> <p><b>How is water important to your farm system? And do you have concerns around the reliability of future water usage?</b> We have fenced off waterways and now pump water to tanks when then gravity feeds water to the water troughs. Our water supply comes from springs in the hills but becomes very slow during the dry seasons (summer).</p> <p><b>General feedback:</b> Most farmers have a freshwater health plan in place already, environmental work is an on-going farm commitment, the Northland Regional Council is going too far and will jeopardise the future of the sheep and beef industry with their proposed plan and regulations.</p>
Jan Boyes	2 - 4, 6, 7 & 11	Managing exotic forests, distance from waterways - The mess of slash and runoff seen in the Gisborne/Hawkes Bay area has told us we need to legislate against slash being left on the hillsides . I

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		<p>think I read no planting closer than 30m from streams and rivers, and native trees planted on the boundary of this exclusion zone.</p> <p>Stock exclusion from waterways. Major initiatives like the Kaipara Moana Remediation have shown how fenced setbacks can improve the waterways. probably 3 -5 metres should be enough.</p> <p>Stock exclusion from Highly erodible land, It is sensible to keep stock from eroding land over 350, or at least limited stocking. We do not want pine trees everywhere!</p> <p>Managing highly erodible land has to be done sensitively with farmer support</p> <p>Eliminating discharges to water (nitrogen use and other discharge) Yes we must do this</p> <p>Tangata whenua values are important but landowners have to be accepting of any major changes. Not everything has to happen fast, as Central government has found out.</p> <p>Eliminating discharges to water (nitrogen use and other discharge) Yes we must do this</p> <p>Generally I am happy with the aims you have for these changes</p>
Stephen Bracey	2, 6 & 7	<p>One of our concerns with the proposed plan is the slope map is the sole determining factor for highly erodible land. On our run off we have "steeper" country, but in Cyclone Gabrielle, we had no slips on these areas, this was after more heavy rain on top of already wet soils. We would like to see more analysis of these slope areas, looking at soil type, parent material as well as previous erosion events before being limited in our ability to use this land.</p> <p>We would like to encourage the council to talk with Fonterra about including their Farm Environment Plan as the basis of a Fresh Water Farm plan, for both the dairy platform and also the runoff. This would reduce duplication, time and financial cost to the business.</p> <p>In Ruawai there are a lot of manmade drains which would greatly reduce grazing on productive farm land if stock exclusion rules were implemented with 5 metre or larger setbacks. The drain banks are already in grass species which acts as a brilliant filter stopping sediment from entering the water ways. Another issue with greater setbacks would be maintaining the canals.</p> <p>Under pinning the proposed changes is the glaring fact that we have a mortgage on our land, the bank still needs to be paid. Any rules and implementation of need to be sympathetic also to the financial wellbeing of the farmer. We are trying our best to be environmentally friendly in everything we do, but can't be green if we're in the red!</p>
Lester & Christine Bramley	2, 3, 6, 8, 9 & 11	<p>Erodible land:</p> <p>Overall % of the farm should be reviewed before it should be considered an issue. Underlying soil type(s) of individual farms will be very important and there will be significant variations between farms/paddocks. Overall rainfall and distribution of farm specific areas When you start fencing off and retiring - weed control becomes a very real problem - also maintaining fences as with kikuyu grass, tree's naturally falling on fences this becomes a very large issue over time. This should be more appropriately managed by the implementation of FWFP - opposed to costly and problematic consenting. Using appropriate weight animals for land slope and soli type should be an acceptable way of managing /reducing slippage of sediment. And this should be part of FWFP NOT consented activity.</p> <p>Discharges to water:</p> <p>Inadvertent discharge from adverse weather event needs to be considered. Mapping of controlled overflows could create an engineering issue with overtopping of the dams (in particular with adverse weather event) Effluent irrigation to pasture required setback distance from ephemeral (intermittent) waterway during dry weather periods needs to be considered given Northland topography. ie: in dry weather this should be an available option for farmers. refer above for soil types also requiring consideration here.</p> <p>Stock exclusion from waterways:</p> <p>Stock exclusion from permanently running waterways is realistic and should be managed under FWFP. 3 meters is a practical distance, otherwise weed control will become prohibitive if you extend setback distances either side of the creek to 10 meters. Loss of land is financially crippling for particularly variable slope farms - and or low stocking rate and viability becomes challenged.</p> <p>Timeframes for stock exclusion:</p> <p>Via a FWFP this could be achieved by a pragmatic over time process that enables financial viability and</p>

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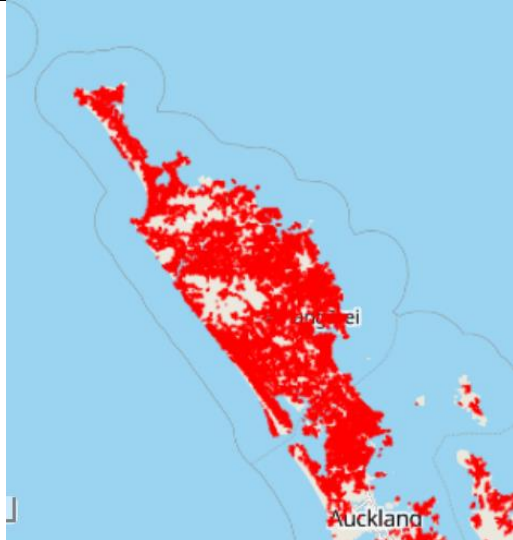
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		<p>significant consideration needs to be given for wellbeing and capability of individuals farming these areas. Health and safety through consent pressured activities that are timebound will potentially create mental health issues.</p> <p>Funding and support: All activities that lead to community good should not be left to farmers to shoulder the costs alone.</p> <p>Overall: FWFP's must be the way forward. These are the only cost effective, practical solution - however time needs to be factored into these to cover all the above comments. Stocking rate, soil types of individual farms must be front of mind. Consultation needs to be on-going and opportunities made available such as workshops to help farmers through this process. In depth look at a range of Northland farms and operations large and small to ensure consensus of path forward.</p>
Inge Bremer	1 - 12	<p>(Stricter enforcement of rules with punishment for breaches)</p> <p>I am writing to express my full support for the proposed "Draft Freshwater Plan Change" and urge its implementation without delay. As a concerned citizen deeply invested in the wellbeing of New Zealand's environment, economy, and communities, I believe that urgent action is necessary to address the pressing issue of water pollution and mismanagement.</p> <p>The current state of our rivers and lakes, marred by pollution and sedimentation, is simply unsustainable. The health of our water bodies directly impacts the wellbeing of our people and the prosperity of our economy, particularly in regions like Northland where access to clean water is vital for various industries, including tourism and agriculture.</p> <p>I commend the inclusion of Tāngata whenua perspectives in the proposed plan, recognizing the importance of indigenous knowledge and stewardship in water management. It is imperative that the Northland Regional Council (NRC) takes decisive steps to enforce necessary rules and restrictions, working in collaboration with District Councils to ensure compliance and accountability.</p> <p>Specifically, I endorse measures aimed at reducing sedimentation and E.coli contamination, such as implementing stricter regulations on stock exclusion and riparian planting. These actions not only mitigate immediate pollution but also contribute to long-term environmental resilience and sustainability.</p> <p>Furthermore, I support the proposed Water Allocation Policy, which seeks to manage water resources responsibly and equitably. The current "first in first served" approach is outdated and inequitable, and I believe that the 20% water allocation policy will lead to improved outcomes for all stakeholders, including cultural, social, economic, and environmental interests.</p> <p>While the existing "Actions" outlined in the draft plan are commendable, I urge for a stronger focus on enforcement and compliance. It is essential that monitoring efforts translate into tangible actions, with swift responses to instances of non-compliance, such as investigating and rectifying sources of pollution promptly.</p> <p>I also endorse potential actions aimed at increasing funding for stock exclusion, riparian planting, and wetland restoration, as well as strengthening compliance measures and supporting tāngata whenua involvement in freshwater management. While these initiatives may require additional financial resources, the long-term benefits they offer far outweigh the short-term costs.</p> <p>In closing, I acknowledge the challenges posed by potential increases in rates to fund these initiatives. However, I believe that the majority of ratepayers would be willing to support measures that have a positive impact on the environment and climate resilience. As such, I urge you to prioritize the implementation of the "Draft Freshwater Plan Change" for the benefit of current and future generations.</p>
Peter Bruce-Iri	2, 3, 5 – 10 & 12	<p><b><i>The vision, objectives and/or targets for our freshwater future</i></b></p> <p>Te Mana o te Wai is an enlightened document. In the face of right wing parties to remove it from the national plan, I urge the NRC to uphold Te Mana o Te Wai as a foundational document for the guardianship of water.</p> <p>We want to be able to swim in all waters, not wade.</p>

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		<p><b>Managing highly-erodible land, Stock exclusion – distance from waterways, Stock exclusion – highly-erodible land</b></p> <p>Proposed plans that dictate slope or setback are too crude to be effective and will alienate farmers. Other factors must be considered, especially the application of synthetic fertilisers, pasture management, and stocking rates.</p> <p>Farmers who reduce artificial inputs, actively improve soil structure, and water infiltration and percolation, and/or improve pasture management leaving longer residuals will have much less impact on waterways. Furthermore reducing biocide and pharmaceuticals will further reduce toxins entering waterways.</p> <p>Riparian plantings are valuable, but are just a band-aid if industrial agricultural practices keep reducing soil quality, and applying synthetics and biocides.</p> <p>Please consider how to reward those farmers improving pasture and soil management practices. Please also recognise that the increasing soil water-holding capacity through the increase in organic matter is valuable to flood and drought resilience.</p> <p><b>Eliminating discharges to water</b></p> <p>Recognise the damage improperly treated sewage, microplastics, black carbon and forever chemicals do to aquatic and marine life, especially micro-organisms. We will need to start considering eliminating the most toxic chemicals discharged from households, industry and land-use.</p> <p><b>Managing exotic forests</b></p> <p>Ban the use of pine for carbon farming.</p> <p><b>Enabling tāngata whenua to practice as kaitiaki for wai</b></p> <p>Support tangata whenua to have a more active role in monitoring, compliance and enforcement.</p> <p><b>Managing water allocation</b></p> <p>Rethink land use planning to limit the over-reliance of monocultures on the water resource. Aspire to more of a mosaic approach to land use and support those land-owners that adopt water and climate friendly practices.</p> <p>Value water for itself above economic use.</p> <p><b>Support and funding for efforts to improve freshwater</b></p> <p>Reward good practice funded from increased penalties for bad practice. The NRC must lift its game with compliance.</p> <p><b>Aquifers and catchments</b></p> <p>Until aquifer health can be properly quantified, use the precautionary principle with allocations.</p>
Terry Bunn		<p>Material quoted (in (1) to (8)) is from <a href="https://www.wai-it-matters.nz/media/hsnfv4ir/the-draft-freshwater-plan-change-have-your-say-final.pdf">https://www.wai-it-matters.nz/media/hsnfv4ir/the-draft-freshwater-plan-change-have-your-say-final.pdf</a> , <b>The draft Freshwater Plan Change: Have your say</b></p> <p>(1) You say ‘there has been huge loss to the mauri of wai māori (freshwater), ecosystems and taonga species that rely on wai’. You then define <b>mauri</b> as ‘life force’. How can you base any scientific analysis of Northland’s water quality on ‘loss of life force’?</p> <p>(2) You say ‘The water cycle is an expression of love between the heavens and earth, and each stage is a critical component.’ How can you base any scientific analysis of Northland’s water quality on ‘The water cycle is an expression of love between the heavens and earth’?</p> <p>(3) You say ‘<i>E. coli</i> is an indicator for bacteria and viruses in the water that can make us sick.’ When looking at <b>Faecal source tracking and the identification of naturalised <i>Escherichia coli</i> to assist with establishing water quality and faecal contamination levels</b> I found the following (<i>italics and bold</i> my emphasis) Using logistic regression analysis, higher levels of generic <i>E. coli</i> <b>appeared to be predictive</b> for Salmonella, Norovirus GI, Norovirus GII, and viruses. You have extrapolated <b>appeared to be predictive</b> into is an indicator for bacteria and viruses ... make us sick. Also, to quote from <i>Escherichia coli</i> as a Tool for Disease Risk Assessment of Drinking Water Sources</p> <p>Stephen T. Odonko corresponding author 1 and Tahiru Mahami 2 ‘The mere existence of <i>E. coli</i> in water does not necessarily imply the presence of disease-causing microbes’. You are thus basing a lot of your</p>

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		 <p>doom and gloom E. coli scenario on science that has a degree of controversy associated with it which you tangentially allude to by using a source which has the 'get out of jail free' words <b><i>appeared to be predictive.</i></b></p> <p>(4) You say 'We will know if we are on track to achieve the vision if by 2040: Tāngata whenua values and mātauranga Māori are identified and are embedded in freshwater management'. You cannot institute 21<sup>st</sup>-Century protocols based upon non-scientific (i.e. mātauranga Māori) principles.</p> <p>(5) You say in your plan 'Wastewater treatment plant discharge to water – prohibiting new discharges to water and stricter requirements for renewal of existing consents.' The irony of this is that your very own Taipa Wastewater Treatment Plant generally does not comply with the ammonia standards set down in the resource consent – in other words it is unconsented. Rather than spend time and money on telling us how we should be managing our land, why don't you sort out your own issues first?</p> <p>(6) You say 'Northland has lost nearly all our natural wetlands (94.5%).<sup>10</sup>' You quote Forest &amp; Bird (2018). World Wetlands Day: Forest &amp; Bird release maps showing extent of wetlands crisis who in turn get their information from <a href="https://data.mfe.govt.nz/layer/52676-current-wetland-extent-2013/">https://data.mfe.govt.nz/layer/52676-current-wetland-extent-2013/</a>, ie the Ministry for the Environment. Using Prediction of wetlands before humans arrived from <a href="https://data.mfe.govt.nz/layer/52676-current-wetland-extent-2013/">https://data.mfe.govt.nz/layer/52676-current-wetland-extent-2013/</a> produced the following map:</p> <p>Are you seriously maintaining that Northland was basically a HUGE SWAMP? And if this was the case, most of Northland residents would have to leave and let Northland return to its pristine state of being permanently waterlogged.</p> <p>(7) You say 'We are considering setting aside 20% of water available for allocation to be used for environmental enhancement, marae and papakainga, or developing Māori land. The water could be used for other purposes with a contribution to a fund supporting Māori wellbeing.' By saying 'The water could be used for other purposes' aren't you opening the door for who knows what water usages with the prime aim being to fund Maori in some (indeterminate) way?</p> <p>(8) You say 'reserving a portion of allocable water for environmental enhancement or tāngata whenua'. A portion of allocable water for tāngata whenua means doing what with it? Sell it? Leasing it? Theoretically, Maori could stop access to, and/or pollute, this allocable water?</p> <p>(9) As a postscript... Following is a picture of my farm with Sediment and Erosion highlighted. You will note that virtually <b>all my land</b> that could cause problems has been fenced off and planted – suggesting I have already fulfilled the requirements of the The draft Freshwater Plan Change? (include photograph).</p>
Sally Caisley	6 - 8	In Northland many wetland areas have been turned into grazing areas with stock right up to the estuaries and rivers. Wetlands are our natural filtration barriers so even on private land this should not be allowed. Coastal farmland and lifestyle blocks should have stricter rules about how these zones are used. Funding should be allocated to re-establish and improve these areas and this would help with future flooding also.
Daniel Campbell	2, 4, 6 & 7	<p>We Dairy farm in Pipiwai and have a number of areas that would be affected by this plan change. There are a number of areas I would like to express my concerns.</p> <p>Stock exclusion from waterways: We have a farm environment plan completed and have taken actions to mitigate our risks. This includes fencing off all permanent water ways, and even my temporary waterways at significant cost. Under these rules, would I have to move all of my fences? Not every</p>

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		<p>water way is equal. We farm on flooded areas, and these areas need to be managed carefully. I believe this can be done through a management plan. Contents are to strict, costly and create uncertainty.</p> <p>Forestry: Over time, we have seen more and more slash come down from forestry blocks. At the last major flood, it took months to clean. It concerns me that the Council can not get compliance under current rules, how will they enforce these new rules? If we can not farm to our waters edge, how are they able to harvest to their waters edge? I would like to see enforcement of catchment areas and harvest management.</p> <p>We want to ensure that we can farm in an environmentally friendly way, but some of these changes will put significant strain on our ability to be viable.</p> <p>All want is fair rules for all and certainty. stop changing the goal posts!</p>
Lyn & Alister Candy	2, 5, 6, 9 - 11	<p>Managing Highly erodible land: On our farm we manage our soil types, contour and stocking rate to ensure we minimise any sediment to waterways. Consent is not the way forward - work with land owners individually to achieve a plan forward and this could be obtained with FWFP. What will happen with maintaining the weeds and fixing all the fences - with not every farm having staff this could become very hard to achieve and costly. Potentially reduces access to other parts of the farm.</p> <p>Managing impacts on tangata whenua: What are the values - are widely distributed ? All in agreement - who manage this process? What is the input from tangata whenua for the value of farming?</p> <p>Stock exclusion -distance from waterways: we would have to reduce cow number - loss of production lay off staff - and question the on-going viability of our farm business. The maintenance of the area within the fenced area - weed control etc would costly and time concerning.- During flooding can cause restriction and increase the detrimental impacts further when flooding. Flood areas has to be easily replaceable fencing as we are unable to get posts into river rubble. Ridiculous!!</p> <p>Managing the water allocation: we just don't understand it - who do we consult? this creates a lot of uncertainty for us.</p> <p>Enabling tangata whenua to practice as kaitiaki for wai: as above: Support and funding for efforts to improve water: Its come too late for a lot of farmers - but it should be there and available. Its the replacing after flooding. Financial support for weed control and the planting of the riparian areas.</p>
Carbon Neutral NZ Trust Kerikeri Branch (Inge Bremer)	1 - 12	<p>(More compliance and enforcement - with penalties)</p> <p>Carbon Neutral NZ Trust Kerikeri Branch fully supports the "draft Freshwater Plan Change".</p> <p>New Zealand's and Northland's wellbeing of people and economy depend on clean water.</p> <p>The present situation of unclean rivers and lakes is not sustainable and requires urgent action. This might require rules and restrictions limiting immediate economic outcomes of individual operations, but they are necessary to ensure their long-term success. Dirty rivers lead to dirty coasts with impact on recreation and fisheries.</p> <p>The described Tāngata whenua perspectives on water are appropriate.</p> <p>NRC must impose required rules and restrictions to safeguard the waterways and lakes as well as to ENFORCE them in conjunction with District Councils.</p> <p>Sedimentation and E.coli (irrespective of human from faulty/overflowing septic tanks or animals) in rivers and lakes must be stopped. Wherever they are noticed, the source of pollution must be investigated and stopped. The present finger pointing from one to the other Council must stop.</p> <p>Water testing and the website <a href="https://safeswim.org.nz/">https://safeswim.org.nz/</a> is good to have for the time being, but action is required to improve the situation vigorously.</p>

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		<p>The lack of riparian planting and fencing must be rectified with regulation, advice and financial support, however with little delay: farmers have had ample of time to be prepare for this obvious requirement. Financial support should be limited to low income farmers.</p> <p>We especially support</p> <ul style="list-style-type: none"> <li>- protection of highly erodible land</li> <li>- 10 meter setback for cattle, although more might be appropriate/necessary in certain areas like steep land to avoid erosion and pollution</li> <li>- stock exclusion rules to our most highly erodible land and encouraging stabilisation of these areas with trees. It would be effective at reducing sediment runoff and make slips less likely and less severe. Furthermore, some of the costs of excluding stock from this land can be recouped by planting in carbon forestry or permanent forests that are selectively logged.</li> <li>- add non-dairy stock to be excluded from hill country wetlands</li> <li>- stock exclusion should be extended to apply to all farmed animals</li> <li>- phasing in new stock exclusion requirements over the next 10 years or so, if not possible earlier (maybe with incentives)</li> </ul> <p>&gt;&gt;&gt; surely the estimated short term cost will lower than the long term effects of erosion and pollution</p> <p>We also support the draft Water Allocation Policy.</p> <ul style="list-style-type: none"> <li>- Water is a limited resource which needs to be treated, managed and allocated responsibly to avoid problems in the future.</li> <li>- The current 'first in first served' system is unsustainable and unfair.</li> </ul> <p>We support the 20% water allocation policy to improve cultural, social, economic and environmental outcomes for wai</p> <p>We support the existing "Actions", but</p> <ul style="list-style-type: none"> <li>- while monitoring and research is essential, they need to lead to more action.</li> <li>- we consider Action 7: Compliance and Enforcement of existing rules as insufficient.</li> </ul> <p>e.g. when E.coli is found in the Kerikeri River, the source has to be searched and eliminated rather than just noted. Vision Kerikeri was informed by the previous CEO that the E.coli was caused by "avian" in the Kerikeri Basin (ducks, geese, doves, gulls) which VKK's water testing at testing stations further upstream proved wrong (also polluted); also repeatedly the testing showed much higher E.coli levels after heavy rain; thus it needs to be researched whether the source is human (ill-functioning septic tanks) or bovine (stock in or near the river); in case of septic tanks, immediate cooperation with FNDC is required; 176 abatement notices and 101 infringement notices within one year seem to be very low</p> <p>We support Potential Action 8: Funding to support stock exclusion, riparian planting and restoring wetlands</p> <p>We support Potential Action 9: Increased compliance</p> <ul style="list-style-type: none"> <li>- We understand that it is costly, but with stricter enforcement, penalties for non-compliance can cover at least part of the cost. The effect might be more volunteer compliance to avoid penalties.</li> <li>- It is obvious that Action 1: Freshwater state of the environment monitoring programme with about 20 staff is expensive, but possibly ineffective without researching causes with a lead to compliance - so cost might be shared for the two Actions.</li> </ul> <p>We support Potential Action 10: Supporting tāngata whenua involvement in freshwater management and decision-making</p> <p>In regard to New potential actions over and above existing NRC commitments it's difficult to judge whether numerous points cannot be covered by existing staff and what the impact on rates would be. While we would consider more rates for more positive impact on the environment and climate positively, it might be tough for the majority of ratepayers?</p> <p>We request Waste Water Effluent for ecological and cultural reasons to stop being discharged into waterways and lakes. All existing WWTPs need to be changed asap. Appropriately cleaned waste water (e.g. with low cost Electro Coagulation) can provide valuable food safe irrigation water and fertiliser.</p> <p>We also request controlling of exotic forestry:</p> <ul style="list-style-type: none"> <li>- Larger setbacks for exotic plantation forestry from waterways are required</li> <li>- Prohibit clear-felling of forestry in high risk and steep areas: slash has been problematic in recent storm events</li> </ul>

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		<ul style="list-style-type: none"> <li>- requiring consents for plantation forestry in dune lake catchments</li> <li>- livestock owners who have not yet excluded stock from waterways must not be allowed to impact New Zealand's major assets adversely.</li> </ul>
Jesse Card	1 - 11	<p>Hello, I'd like to voice my support for adopting all of the most stringent controls and setbacks that have been suggested. However, I would like to encourage more funding for farmers like:</p> <ul style="list-style-type: none"> <li>- guaranteed riparian planting funding so that the riparian areas don't just become invasive weeds.</li> <li>- funding for providing stock tanks and pumping for farmers who currently rely on the waterway access for stock watering.</li> </ul> <p>In addition I would suggest:</p> <ul style="list-style-type: none"> <li>- A fee attached to each hectare or log of exotic forestry. This funding should be used directly for controlling invasive weeds and pests. Primarily wildling pines, but also for ensuring other exotic controls throughout the region.</li> <li>- Make controlling invasive weeds and wildlife a requirement for forestry leases on council-controlled or owned land. Failure to do so should be punitive enough to ensure compliance. Ensure that this can't be escaped by forming a different company or declaring bankruptcy.</li> <li>- Make testing frequent. Ideally at least once per week per kilometre for all major waterways. This will help us identify scofflaws or other problem areas to address them.</li> <li>- Permanent real-time data-collection stations should be at the end point of all our major rivers.</li> <li>- Fines should be based on income and/or land area and quickly ramp up for offenders. Breaking water laws absolutely cannot be accepted and be something that someone can write off as a cost of doing business.</li> </ul>
David Carey	12	<p>Pest plant control</p> <p>Alligator weed is going to become major concern - particularly as its able to adapt to increasing temperatures, and results in increasing water temperatures itself. NRC hasn't taken tackling Alligator weed seriously and its going to become impossible to deal with unless council focuses on controlling and minimizing its spread. Not sufficient consideration in the draft freshwater plan change about dealing with pest plants such as Alligator weed. Needs coordinated effort to ensure that people know how best to remove it and destroy it (e.g. only slow release pesticide works that gets deep into its rhizomes)</p>
Sonja Carter		<p>As a member of the public and a Te Tai Tokerau resident, I am greatly concerned about the poor health of freshwater and the urgent need for us all to treat wai with more respect. I am seeking your support and action to ensure that the proposed freshwater plan change and action plan, and the Long Term Plan, uphold Te Mana Me Te Mauri o Te Wai, as a matter of urgency and priority.</p> <ol style="list-style-type: none"> <li>1. It would also be good to see Northland Regional Council consider what it has proposed in the draft plan change and action plan along with other ways that things can get done because, delivery by NRC is not the only way, nor the most effective and efficient. The things that are important to me are listed below.</li> <li>2. Te Mana Me Te Mauri o Te Wai is fundamental and central to improving water quality in Te Tai Tokerau – we all need healthy water for healthy lives and livelihoods.</li> <li>3. Supporting tangata whenua and communities to undertake actions on the ground – NRC's focus has to be on enabling community-based action that results in long-term environmental gains and promotes sustainable livelihoods.</li> <li>4. Tangata whenua have been managing their wai and whenua, based on tikanga, kawa and mātauranga – NRC should be supporting kaitiaki and not standing in the way of rangatiratanga.</li> <li>5. We need to change how we think about and treat our wai – we must listen to our awa, repo and roto. Improving the mauri (life force) of wai is a prerequisite to sustainable livelihoods in Te Tai Tokerau. How we use our lands and forests needs to change and NRC's role is to support and enable landowners to use their lands in ways that result in improvements to freshwater first and foremost. I support giving greater respect to wai as a living entity with a right to be healthy and thrive (legal personhood).</li> </ol>

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		<p>6. It is not sustainable to continue enabling land uses that result in declining freshwater health. Flexible and adaptable approaches are needed that support and encourage communities to work together at local levels. Setbacks and stock exclusion policies and rules should come along with NRC support to landowners to sustain alternative livelihoods from riparian margins and highly erodible land which results in environmental improvement and enhancement as quickly as possible. Incentives could be negotiated with financing institutions for loans to support fencing wider setbacks and permanent native reforestation and wetland and riparian restoration. Council should not only consider the economic costs to landowners when considering the actions proposed but also the gains and benefits from improved freshwater health to all.</p> <p>7. NRC budget allocation must consider how service delivery (such as resource consents and environmental monitoring) might be more effectively and efficiently delivered and not assume that it is the council who should be making decisions and managing freshwater. This means also committing to and following through on transferring powers and functions to māori, entering into (and implementing) relationship agreements and contracting tangata whenua direct involvement in freshwater management to name some examples.</p> <p>8. The freshwater plan change and action plan needs to focus on the freshwater needs of our children and grandchildren and not the short-term economic gain of a few. With this in mind, I would like to see climate change, Te Mana Me Te Mauri o Te Wai, empowering our local communities to improve freshwater health and ecosystems at the top of the list for priority action. Ensuring that the health and well-being of wai are put first and foremost in all NRC's planning and decision-making on freshwater is critical to our ability to sustain livelihoods. Further work on future water demand in light of up-to-date climate science is needed, including consideration of relocation of settlements, kāinga and marae and their future water needs, as well as population growth and migration.</p> <p>9. It is important to me that spending is aligned with Climate Action and proper consideration of ways in which water wastage can be reduced, alternatives that will reduce demand for freshwater takes (e.g. desalination or cropping choices) and more equitable allocation approaches to the existing 'first come first served' approach must be explored and implemented. I support the proposed targeted water allocation policy which would set aside 20% of any allocation for particular uses such as marae, papakāinga, māori land use, and environmental enhancement. Associated funds generated by applications for other uses should be used to support community-based and hapū led freshwater improvement activities in Te Taitokerau.</p> <p>10. It is also important to me to be able to be part of wider NRC decision-making, beyond providing feedback on the draft freshwater plan change and I request that you keep me updated on what NRC is proposing in relation to freshwater, Te Tiriti, climate change and budget and LTP decisions.</p> <p>11. Mana whenua must be involved in any further development of this freshwater plan change and action plan and the Long Term Plan must include sufficient budget for input from tangata whenua from development through to implementation. The focus must be on supporting whanau, hapu and iwi action on the ground working at the community level to improve freshwater in Te Tai Tokerau.</p> <p>12. The council needs to demonstrate it is taking its Te Tiriti partnership roles and responsibilities seriously and recognise He Whakaputanga and the findings of the Waitangi Tribunal relating to freshwater.</p>
Lena Chapman	1, 2, 5, 7, 9, 10 & 12	<p>1. Proposed NRC key draft rule change: "We are looking at options to update maps of land vulnerable to erosion. We've developed two new draft maps Land at high risk of erosion (25°-35° slope) Land at severe risk of erosion (&gt;35° slope). We're considering new rules limiting vegetation clearance, land preparation and earthworks in areas of high erosion risk, with tighter controls applied to these activities in areas with severe erosion risk. See draft Freshwater Plan Change, Sections C.8.2 Land preparation, C.8.3 Earthworks, and C.8.4 Vegetation clearance in riparian areas and foredune management areas.</p> <p>We're considering new rules requiring stock to be excluded from areas of both high and severe erosion risk."</p>

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		<p>Feedback: If all land in Northland of 25% or greater incline to be deemed 'highly' to 'severely' erodible and subject to stock exclusion and no vegetation removal/clearance etc. What percentage of private owned land in Northland does the 25% and above equate to and by default what percentage in terms of land area of Northland remains below the 0-24% threshold?</p> <p>What does this mean for hill stations and other large areas of traditional farm land that have areas over the 25% threshold?</p> <p>What about other land over 25%, will people no longer be able to build houses on this land? How will this impact land value? With talk of requiring exclusion zones on coastal and low lying areas that are traditionally flat land, will this mean we are left with a greatly diminished area of land people can either build/live or farm and grow crops on?</p> <p>What will this do to the value of farms that have their stocking ability impacted by these changes?</p> <p>What does this mean for the future of farming and the capacity for food production in Northland?</p> <p>2. Proposed NRC key draft rule change: "In line with the National Policy Statement on Freshwater Management, we've committed to improving the way we involve and support tāngata whenua in looking after freshwater, and to recognising Māori values in our decision-making about water".</p> <p>Add requirements for resource consent applicants to assess cultural impacts that affect tāngata whenua values for freshwater. See draft Freshwater Plan Change, Section D.1. Tāngata whenua.</p> <p>A resource consent application must include in its assessment of environmental effects an analysis of the effects of an activity on tāngata whenua values and practices"</p> <p>Feedback: Reading the relevant section of the draft plan, perhaps not every resource consent will require the cultural assessment, however there is a long list of criteria one must exclude before they can confirm the assessment will not be required.</p> <p>The wording of the assessment criteria itself gives rise to many questions around the interpretation and implementation of this 'involvement by and support of tangata whenua'. Additionally as part of having to seek approval for this aspect of a resource consent the onus is on the applicant to; " identify and describe all the cultural resources and activities that may be affected by the activity' and 'identify and describe the adverse effects of the activity on the cultural resources and cultural practices (including the effects on the mauri of the cultural resources, the cultural practices affected, how they are affected, and the extent of the effects),".</p> <p>The criteria for cultural resources, activities and practices is extensive and is not linked purely to the land and people either living or through a historical connection, but also to 'spiritual associations' including 'deities' and their 'progeny'. Posing the question of how much additional cost, time and bureaucracy this somewhat subjective requirement would add to the resource consent process and even if a remedy could ultimately be found to the 'affects'.</p> <p>3. Proposed NRC key draft rule change: "When we allocate water, we need to provide for the wellbeing of the waterway and recognise the special relationship tāngata whenua have with water.</p> <p>We are considering setting aside 20% of unallocated water to be used for environmental enhancement, marae and papakainga, or developing Māori land".</p> <p>The National Policy Statement for Freshwater Management 2020 requires us to manage freshwater in a way that gives effect to Te Mana o te Wai. It also requires that tāngata whenua are actively involved in freshwater management (including decision-making), and Māori freshwater values are identified and provided for. The draft Freshwater Plan Change must give effect to these principles.</p> <p>Although the Targeted Water Allocation Policy would be a change in the way council allocates wai, it forms an important part of giving effect to Te Mana me to Mauri o te Wai in Te Taitokerau.</p> <p>It would also be available for other uses, with a contribution to a fund. How would this fund work? Council would need to include Regional Plan rules for contributions to the fund in consultation with tāngata whenua1.</p> <p>Feedback: This rule change in its entirety appears to seek to undo the council's current policy of 'first come first served' to provide one group of people with management rights including decision making rights over all freshwater. Further to this it allocates specific rights over 20% of the fresh water the council manages, to one group based on their ethnicity, which both sound remarkably like co-governance. The fact that use of the allocation is available through an unspecified 'contribution to a</p>

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		<p>fund' sounds like it would provide the ability to on sell this water, which undermines the intended use specific to Maori land the water would have been set aside for in the first place.</p> <p>What does 'management and decision making ability over freshwater' mean in practice? How would the 20% be practically allocated from future resource consents and how much cost and complexity would this add along with the additional resources required to manage this through the resource consent process?</p> <p>Would this 20% be in the form of a monetary contribution as how do you hand over 20% of your water otherwise?</p> <p>How would this monetary contribution be provided? An additional cost to the resource consent and/or ongoing water rates charges to the land owner?</p> <p>Who would receive this money and how would it then be allocated?</p> <p>Would the allocation be capped at 20% in perpetuity, what about the costs and contributions?</p> <p>Does this only relate to water in rivers or lakes etc on the land or could it include rainwater also?</p> <p>I do not believe anyone owns water, it existed on earth before humankind, forms part of the natural environment that is a shared resource by all countries and is essential for life on earth, to give rights over water to one group of people based on ethnicity sets a concerning precedent.</p>
Lorraine Chester		<p>I wish to put the following questions to the online hui which I will be attending</p> <p>We live on a lifestyle block in Ruakaka bordering on a wetland area</p> <p>I would like to know why you are wanting to do this and what the entire overall benefit will be to both the community and the farmers and why NO COMPENSTATION to the farmer is being offered when our rates are increased annually by up to 10 percent.</p> <p>ALSO PLEASE SEE MY NOTE RE weeds etc. which I have highlighted I would like to know how you would sort this out please as I think it's a reasonable question and would like an answer</p> <p>I note that you are proposing to push back the boundary fencing on water way areas. I find the increase that you are looking at of up to 10metre preposterous I believe this is approximately 300 per cent more than the NPS increase guidelines. This is crazy we have just spent over \$6000 upgrading all our fencing so that the wetland area is protected plus spent approx. \$1000 on trees for the surrounding area and wetlands to help with water filtration and now you want to lumber us with more costs..... for what??</p> <p>How on earth do you expect people that have a lifestyle or a farm to have to adhere to this , both cost wise and also losing valuable pasture for our stock with no compensation at all</p> <p>What about the fire risk with weeds etc growing in the extended area, I note with scepticism you suggested pulling about the weeds manually.. so are you offering to send out labour to help with this when most people have their days full with everyday farm jobs also water rats and other vermin will have extra areas to hide in and be closer to our dwellings</p> <p>And god forbid if we get gorse or blackberries in this extended area as we will need permission to spray and can be opposed by landowners further down so we could end up with more noxious weeds in this area when we have been asked in the pass to rid our property of this. Tell me how this makes sense please ?</p> <p>I believe that this proposal will devalue our land as we will have less land to graze or plant what we want to on</p> <p><i>Not a sensible proposal at all NRC why don't you work on areas that our community needs, i.e. affordable housing and more help with communities such as Animal rescues centres when our area is drowning in unwanted animals being dumped into the community</i></p> <p><i>I want to know how is this proposal going to help people looking for a place to rent or live or needing groceries to feed their families ... wake up NRC and look at the things that are <u>necessary in this community</u></i></p> <p><i>Most farmers already adhere to rules regarding waterway areas and when I drive around I see a lot of planting of trees at personal expense to the landowner</i></p>

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Kerry Chestnut	2 – 10 & 12	<p>HEL; Limit vegetation clearance Do NOT exclude stock</p> <p>Reduce Discharges; All urban households to have water tanks All urban storm water to be separated from sewerage lines</p> <p>Continue with resource consents for treated dairy effluent.</p> <p>Exotic Forests; All trash must be removed from forest floor directly after harvest Main concern is blocked water ways and excessive loss of sediment</p> <p>Impacts Tangata whenua; No need for cultural impact assessment for resource consents If the activity planned meets the general designated requirements it should meet it for all members of society</p> <p>Stock exclusion; Fenced water ways to remain at 3m Any wider a haven for noxious weeds and huge loss of Northlands productive land. Northland has precious little of highly productive flats</p> <p>As no changes should be implemented there are no time frames</p> <p>Managing water allocations; If large companies have water consents well above their current usage these surplus quantities should be re allocated to smaller users</p> <p>General farm and stock use does not need to be monitored</p> <p>Water use in general is dictated by stocking rate</p> <p>Northlands climate and soils dictate stocking rate</p> <p>By monitoring stock and farm water it is another unnecessary bureaucratic form to fill in, water usage will carry on the same as it has in the last 50 years</p> <p>Enabling tangata whenua; All Northlanders rural and urban should be guardians of fresh water not one cultural group</p> <p>Other;</p> <p>Hydro generation; A clear pathway should be set enable an easy process for start ups for this clean energy option</p> <p>Urban responsibilities; The proposed fresh water plan is heavily focused on the rural sector</p> <p>The urban sector is also a polluter of fresh water</p> <p>Sorm water contaminating sewerage lines</p> <p>Run off from oily roads and rubber break down from Tyres</p> <p>Water tanks should be mandatory for every household not banned as at present</p> <p>Would help in reducing summer draw off from our dams</p> <p>Tanks would reduce runoff in times of heavy rain</p>
Calia Chevallier	5 & 6	<p>Kia ora, I live on the N. Wairoa, on a previously undeveloped 7.1 ha property running in 2 levels between the Road and the River.</p> <p>I am happy to have the riverbank fenced but there are difficulties, financial and practical (i.e. I can't do the work myself, particularly as I have sustained a number of injuries over the years and am now on the Super) to just do it and carry out and maintain mass plantings in-block, possibly up to 2km x 10m from the riverbank – of a length of 1 ½ km as measured in a straight line along the Road. Taking into consideration, the Estuaries at each end.</p> <p>When I came to this property, I did start on some fencing -off and some plantings, by the River swept it away over several floods so I didn't go on.</p> <p>I like trees, and have done other plantings, and would like to do more – but I don't know what to do about the River, just a waste of time, energy and money. The floods when we get them, come up over the top of the fence posts on the lower reaches and it can sometimes stay like that for days. The Cyclone last year was the worst, coming well up above the usual.</p> <p>Planting poplars with the intention of stabilising the riverbanks, is a good idea at the start being fast growing, but then they grow so quickly and continue to do so even when topped, they become so tall that the strong winds eventually take them out, leaving large holes in the ground.</p> <p>I believe that as the River is tidal, and the sides stripped-bare mud, that part of the problem with erosion, is from the River eating away the sides of the banks – and ultimately no plantings are going to entirely resolve the problem, as can be seen from the lean on old pre-existing poplars.</p> <p>Manchurian rice grass survives well, but the NRC doesn't like that. Perhaps we could be looking at planting a wall of harakeke as the first live of defence against surface erosion.</p> <p>Just before Covid struck, I thought I'd have another go with at least a start – but Covid put an end to that and the rules changes and changed again, and it was going to need a Bank loan with the now-</p>

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		<p>exorbitant costs of fencing material, so I am no further on. It's not a good climate to be looking at borrowing.</p> <p>I would appreciate some advice on what I should do, but there's no way that I am going to be able to carry out extensive fencing work and plant and maintain riparian plantings myself, for possibly 10m x 2km – with possibly being required also, to fence off the banks which run the entire length of my property in a 7m slope going down the flats.</p> <p>Further:</p> <p>If the proposal to fence off 10m from riverbanks and slopes over 25 deg., goes ahead, I could be looking at – on a 7.1 ha property – having to fence up to 5km (depending on whether my 7m sloping banks to the flats, running the entire length of the property are over 25 deg.) taking so much of my land out of production, while still presumably being required to pay Rates on land shut up and at the stroke of a pen made worthless as no one would want to buy it.</p> <p>The land is not suitable for anything else, except what I am doing with it, which is running small-scale beef or drystock cattle. It is lightly grazed and I do not use artificial fertilisers so contribute very minimally to nitrate run-off.</p> <p>I also wonder about the implications of the Queen's Chain that have not been taken into account, the requirement being a 20m strip for public access to rivers and coastline? Nga mihi</p>
Hamish Child	2, 4, 6 – 8 & 10	<p>1. I am expressing ahi kaa of my land. I am paying a mortgage on it. We need to be able to farm our land sustainably and profitably to keep the mortgage paid and the land looked after for the good of the Northland people, community as a whole and economy. My concern is that a consent process would make my land unprofitable to farm.</p> <p>2. To have iwi consultation for management of our own land and water body, is dictating to us what we do within our boundary. It is "not" iwi land, and it is not iwi water. When this has happened around the globe, it is classed as communism. We need consultation and collaboration and to keep democracy at the fore.</p> <p>3. I see the current NRC draft fresh water plan in it's current form putting up barriers to carry on with sustainable agriculture in Northland which is economic terrorism. I realise we need to focus on reducing sediment and e coli in our waterways, but it needs to be in a manner that isn't going to stop farmer's ability to look after the land.</p> <p>4. Pine trees are big polluters in Northland. Large amounts of money from pine is going overseas. We need to keep the Northland economy thriving while looking after the environment. We need to make sure the pollution stops from pines and slash is dealt with to stop damage in rivers.</p> <p>5. I'm concerned about river plantings slowing water flow and causing flooding of more land.</p> <p>6. A major concern is about being able to keep water allocation for my stock with iwi consultation. This could ruin relationships between communities, and we need to look after the people and the animals.</p> <p>My ideas to remedy the issues:</p> <p>1. No more blanket farming of pine trees. (The danger is huge fire risk and pollution).</p> <p>2. Water testing on individual properties several times a year to have actual data on what is happening to water quality.</p> <p>3. An environmental bonus system with rates reduction if erodible land is fenced off and planted.</p> <p>4. No consent process at all for the management of erodible land.</p> <p>5. A fresh water farm plan for every farm that every farmer manages to the best of their ability (sustainable with profitability).</p>
Wayne & Lynne Clarkin	1 – 3, 6 & 7	<p>We are writing in opposition to the freshwater plan proposal.</p> <p>The first most important topic is the 25 degree gradient of land use which is ludicrous, 45 degrees would be understandable.</p> <p>Secondly the fencing of waterways by 10 metres is ludicrous and unworkable for most farmers – ie – weed control.</p> <p>These and the rest of the new rules proposed will effect us and our rural community immensely.</p>

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		Northland will be a ghost region is these are put through!
Mark Clunie	2, 5 - 8	<p>We are dairy farming and have a great respect and love for the land and water. We have undertaken great lengths to date to fence off waterways. We have steep bush areas that are fenced off and maintained. I have completed a farm environment plan and have undertaken the steps highlighted. I appreciate what NRC are doing to improve freshwater, however it needs to be practical, manageable and actually make a difference.</p> <p>My concerns are around:</p> <p>Stock exclusion to highly erodible land: I have a number of areas that would be captured under the plan. I have created dams and sediment traps which captures any sediment loss. When we update our farm environment plan, further management practices will be adopted. I do not believe we should have to double up on this work with getting a consent as well.</p> <p>Fencing off waterways: I struggle to understand what an intermittent waterway is and what would be required under this plan. We farm highly productive land. If I am taking off 10m on each side when there will be little impact, it would be ridiculous. Will we have our rates reduced for these fenced-off areas? Our flats are an important part of the drainage of the greater area. Upkeep is very important, not just to me, but my neighbours, and I do a lot of work to keep them clean. how will these rules effect my ability to do this?</p> <p>Again, my farm environment plan will address any risk areas.</p> <p>Tangata Whenua</p> <p>I do not believe it is our responsibility to consult with Iwi. I am not qualified to do this, and I do not know who is qualified to talk to? This approach is full of uncertainty and is very alarming. Surely NRC have the ability to control this process and incorporate it into the consent process.</p>
David Cole	1, 2 & 7	<p>Hi, and thanks for the opportunity to have my say. I don't think anyone in their right mind could argue that the aim of these proposed changes are well intended.</p> <p>On our property we have already excluded stock from most of the areas indicated. They are relatively small ( 15ha or so ). We have created a wetland for our pond to discharge into in the rare event when we can't use land based application ( cyclone Gabrielle).All our drains are fenced and we have undertaken a large amount of riparian planting. This all comes at a significant cost, but our cost will be nothing compared to many whose properties will be terminally effected if these changes go through as proposed</p> <p>I don't think Kiwis have a problem with "fair and equitable". The stock exclusion from erodible land is neither. It will see famers losing equity, ( because the land excluded is essentially no longer part of their enterprise. Moreover, it will be a liability, needing to be fenced and have at least weed control to prevent it reverting to export quality gorse). They will also lose the income from that land. I discussed the loss of income and equity with my bank's regional manager at the field days. Surprisingly he wasn't across the issue, and appeared alarmed at the prospect.</p> <p>To be fair and equitable, surely landowners who are being forced to park up significant amounts of their business's, and outlay money to do so, must be compensated. That land is essentially gone forever. When a farm is sold, the excluded land will not command a price, and may actually discount the price if it has ongoing cost. As well as the permanent reduction in income. Like New Zealand, Northland relies on farming. The effects of what is being proposed will be terminal for Northland.</p> <p>Imagine how it would go if a home owner in Kamo was told, " 2 of your 3 bedrooms must be boarded up, along with half the kitchen and the toilet. You mortgage payments will be the same, your rates will be the same, and you have to maintain the entire exterior of the house. And the resale on that house will be ..... ?</p> <p>Please reconsider this plan. Thanks</p>
Peter & Rose Coles	2, 6, 7 & 10	<p>1. Managing highly-erodible land and stock exclusion from highly erodible-land</p> <p>We don't agree that stock should be excluded from highly erodible land. We are successfully managing highly erodible land by the coast by not not overgrazing. This land would be far more erosion prone if we planted it in pine trees. A forestry contractor has told us that under current or proposed rules, we would not be able to harvest pines here. This land is north facing and sandy soils covered in kikuyu.</p>

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		<p>2. Stock exclusion - distance from waterways We think that it should be 3 m maximum as it would be too difficult to clean drains . Even at 3 m it could be too difficult to clean drains. Choked small streams/drains would result in flooding causing erosion and damage to infrastructure i.e. fences.</p> <p>3. Enabling tangata whenua to practise as kaitiaki for wai We think that property owners should be able to practise guardian ship over their own land/wai. We don't think that tangata whenua should be given 20% of unallocated water as of right. The allocation should be given on merit e.g. if a town is running out of water or for stock drinking water to cover periods of drought and low water rates.</p>
David Colley	1, 6 & 12	<p>Whose vision are we talking about here ? Sounds like it is a vision of a narrow group of people within the NRC. The visions &amp; values espoused in this document look distinctly like those of a privileged few who have a particular agenda.</p> <p>Your targets will be impossible to achieve unless just about all hill country farms are de-stocked. The cost of fencing will be prohibitive.</p> <p>The stock exclusion distances are impracticable and the averaging method has an element of farce about it. In many cases much productive land will be lost.</p> <p>It may be very well for the NRC bureaucrats to spend their time producing fluffy feel-good documents telling the rural community what to do but I expect none of them have experienced the real world of making and producing things people need. Do you people not realize what your standard of living is based on ? It is based upon the primary sector who provides jobs for people, make the survival of small villages and towns possible and above all they export food and other products which allows you to have the standard of living you have. It also makes your current employment possible.</p> <p>I have no problem with improving the quality of our water ways providing it is done in a sensible way. In fact it something we should aspire to but not regardless of costs and impact of farmers lives and what is being provided here in the proposals appears to be regardless of costs and impacts on farmers lives.</p> <p>I note in one of your graphs the amount of insects around and in water ways are considered to be at low levels. Do you really think this is down to animals affecting the habitat of these creatures ? In the last several years the number of insects have been falling steadily all over the country and where I live this has become especially noticeable since the erection of a large cell phone tower. There is plenty of clean habitat for them here though that appears to have no impact on the decline. It is well known such ubiquitous radiation has a deleterious effect on insect populations.</p> <p>Please note, the only livestock I have is one sheep so I do not have a vested interest. Most people who read all the nice sounding phrases and emotionally loaded statements and claims will think it is a great idea - who doesn't want clean water and swimmable water ways - but have no idea what a negative impact on their life these proposals will have. One could almost think there is an agenda to depopulate our rural environment.</p>
Roger Comrie		<p>Your proposed freshwater plan is a disaster. I paid real money for my farm and have debt at the bank. For the proposed level of control you need to buy my farm make your rules and then allow me to purchase my farm back at its new LOWER value. Ohhh! You don't have any money then don't make me go broke and my life a misery. Rain comes from GOD to everyone so maori don't own the water. All people are equal so don't send race based box tickers to me .They will not be welcome and told to leave</p>
Catherine Conn		<p>I recently attended one of your online huis and wanted to get an answer to a question that was only half answered during the allocated time. I also asked a follow up question and no answer has yet been made.</p> <p>This relates to the highly erodible maps provided by the Northland Regional Council on the wai-it-matters website. My question was can the maps provide the area of land between 25 and 35 degrees and that above 35 degrees slope for each property title? I am wanting to know what area on my farm is to be excluded so I can calculate the financial impacts to my farm business, which is what the Council has asked for. Ideally by providing the amount of area for each property title, or better still for each</p>

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		<p>yellow or red area, landowners can provide more accurate feedback to the Council whilst all working from the same map. Is it not the Council's responsibility to provide this information?</p> <p>As with slope, the length of permanent and intermittently flowing streams should also be included.</p> <p>Another point I would like to raise, is the accuracy of the maps. For example, during the hui it was mentioned that all land with horizontal stock tracks is to be excluded. However, I can see on the maps a lot of these horizontal tracked areas in my farm business have been identified with a slope less than 25 degrees. I believe that providing contradicting information to landowners is unfair and irresponsible and greater clarification around this issue is urgently needed.</p>
Chantez Connor-Kingi		<p>As a member of the public and a Te Tai Tokerau resident, I am greatly concerned about the poor health of freshwater and the urgent need for us all to treat wai with more respect. I am seeking your support and action to ensure that the proposed freshwater plan change and action plan, and the Long Term Plan, uphold Te Mana Me Te Mauri o Te Wai, as a matter of urgency and priority.</p> <p>It would also be good to see Northland Regional Council consider what it has proposed in the draft plan change and action plan along with other ways that things can get done because, delivery by NRC is not the only way, nor the most effective and efficient. The things that are important to me are listed below.</p> <ol style="list-style-type: none"> <li>1. Te Mana Me Te Mauri o Te Wai is fundamental and central to improving water quality in Te Tai Tokerau – we all need healthy water for healthy lives and livelihoods.</li> <li>2. Supporting tangata whenua and communities to undertake actions on the ground – NRC's focus has to be on enabling community-based action that results in long-term environmental gains and promotes sustainable livelihoods.</li> <li>3. Tangata whenua have been managing their wai and whenua, based on tikanga, kawa and mātauranga – NRC should be supporting kaitiaki and not standing in the way of rangatiratanga.</li> <li>4. We need to change how we think about and treat our wai – we must listen to our awa, repo and roto. Improving the mauri (life force) of wai is a prerequisite to sustainable livelihoods in Te Tai Tokerau. How we use our lands and forests needs to change and NRC's role is to support and enable landowners to use their lands in ways that result in improvements to freshwater first and foremost. I support giving greater respect to wai as a living entity with a right to be healthy and thrive (legal personhood).</li> <li>5. It is not sustainable to continue enabling land uses that result in declining freshwater health. Flexible and adaptable approaches are needed that support and encourage communities to work together at local levels. Setbacks and stock exclusion policies and rules should come along with NRC support to landowners to sustain alternative livelihoods from riparian margins and highly erodible land which results in environmental improvement and enhancement as quickly as possible. Incentives could be negotiated with financing institutions for loans to support fencing wider setbacks and permanent native reforestation and wetland and riparian restoration. Council should not only consider the economic costs to landowners when considering the actions proposed but also the gains and benefits from improved freshwater health to all.</li> <li>6. NRC budget allocation must consider how service delivery (such as resource consents and environmental monitoring) might be more effectively and efficiently delivered and not assume that it is the council who should be making decisions and managing freshwater. This means also committing to and following through on transferring powers and functions to māori, entering into (and implementing) relationship agreements and contracting tangata whenua direct involvement in freshwater management to name some examples.</li> <li>7. The freshwater plan change and action plan needs to focus on the freshwater needs of our children and grandchildren and not the short-term economic gain of a few. With this in mind, I would like to see climate change, Te Mana Me Te Mauri o Te Wai, empowering our local communities to improve freshwater health and ecosystems at the top of the list for priority action. Ensuring that the health and well-being of wai are put first and foremost in all NRC's planning and decision-making on freshwater is critical to our ability to sustain livelihoods. Further work on future water demand in light of up-to-date climate science is needed, including consideration of relocation of settlements, kāinga and marae and their future water needs, as well as population growth and migration.</li> </ol>

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		<p>8. It is important to me that spending is aligned with Climate Action and proper consideration of ways in which water wastage can be reduced, alternatives that will reduce demand for freshwater takes (e.g. desalination or cropping choices) and more equitable allocation approaches to the existing 'first come first served' approach must be explored and implemented. I support the proposed targeted water allocation policy which would set aside 20% of any allocation for particular uses such as marae, papakāinga, māori land use, and environmental enhancement. Associated funds generated by applications for other uses should be used to support community-based and hapū led freshwater improvement activities in Te Taitokerau.</p> <p>9. It is also important to me to be able to be part of wider NRC decision-making, beyond providing feedback on the draft freshwater plan change and I request that you keep me updated on what NRC is proposing in relation to freshwater, Te Tiriti, climate change and budget and LTP decisions.</p> <p>10. Mana whenua must be involved in any further development of this freshwater plan change and action plan and the Long Term Plan must include sufficient budget for input from tangata whenua from development through to implementation. The focus must be on supporting whanau, hapu and iwi action on the ground working at the community level to improve freshwater in Te Tai Tokerau.</p> <p>11. The council needs to demonstrate it is taking its Te Tiriti partnership roles and responsibilities seriously and recognise He Whakaputanga and the findings of the Waitangi Tribunal relating to freshwater.</p>
Laurie Copland	2, 6 & 7	<p>Our farm is at Broadwood. It is approx.. 270ha of which 70ha is fenced off native forest and wetlands. It is a beef finishing farm. This farm has been in family hands since 1918. It has approx.. 30ha of Class 2 land and the rest is Class 6 e.</p> <p>Erosion is a natural phenomena. Large areas of Northland consist of Sedimentary soils by definition it means they came from erosion long before man set foot on this land. Accepted that mans actions has increased the rate that this can occur. I would remind the NRC of what happened in the Warawaras in the late 1990's where massive amounts of sediment came from the slips and erosion from bush cover forest and into the Whangape Harbour and also point out the erosion coming from the Ratea Forest into the Mangonui-o -wae river after it rains.</p> <p>The farm is accredited (Silver) in the NZ Farm Assurance Plus Scheme. This includes, among other items, a Land and Freshwater Management Plan. In this plan this farm has outlined actions and mitigations to reduce any damaging environmental consequences of farming. As part of the programme I was to carry out a SHmak Water test, on two side creeks and the main Mangonui-0-wae river. These tests did not pick up any degradation of the waterways. The two side creeks had the lowest level of N of the test and no P was detected in the water.</p> <p>This farm started fencing off its waterways 30 years ago. These have been allowed to regenerate and where able, exotic weeds are eliminated. It has fenced off 70 Has of regenerating native bush and steeper gullies allowing them to regenerate. It has created sediment traps below steep land. The majority of the steep land is in the fenced off areas with sporadic areas of steep land included in pasture areas. Any erosion from these sporadic areas will be mitigated by actions on these other parts to reduce sediment to enter the waterways.</p> <p>A blanket approach across Northland is not economically efficient way to address issues that may occur in some catchment and not others. NRC is going far beyond national legislation and is applying a one-size-fit all approach that makes little sense in terms of managing risk on individual pieces of land.</p> <p>I submit:</p> <p>That a Catchment by Catchment approach should be used.</p> <p>That Farms that have accredited Land and Water management Plans be excluded from requiring Resource Consents. Different accreditation schemes should be recognized without having to duplicate.</p> <p>That sporadic steep lands that are in pasture is not included as an exclusion area has adverse effects can be mitigated by other means than exclusion.</p>

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Carol Cotton	3, 5 – 7 & 10	<p>Farm Dairy Effluent Discharges to land are presently annually monitored at peak times. To require a Resource Consent as well adds another layer of bureaucracy for land owners and NRC. It seems inefficient.</p> <p>Stock Exclusion. Dairy farmers have fenced their waterways to 1m. To add to that is frustrating and another cost.</p> <p>I agree that farmed animals should have access to alternative drinking water which makes drinking from streams unappealing.</p> <p>The Cultural Impact Assessment required with each local group seems confusing to land users and very time consuming and costly to all parties. I feel this needs to be considered very carefully and implemented over an extended time frame.</p> <p>Northland region is struggling economically and to layer more compliance costs coupled with the loss of productive land will have an economic impact and could even mean farms are no longer economically viable. This reduces the future resources the region has to improve everything, not just water.</p> <p>At present we have the Fresh Water Farm Plans being rolled out and it seems inefficient to have another different set of regulation burdening our productive sector.</p> <p>I feel the NRC should be working toward supporting farmers to meet their obligations with the Fresh Water Farm Plans.</p>
Cynthia Cotton	2, 6, 7 & 12	<p>(Urban understanding of freshwater responsibilities. Work already completed)</p> <p>Overview of my farm which informs my comments:</p> <p>We have 162 ha in Arapohue. 115ha is effective and this area corresponds to the low slopes on the draft maps. Our &gt;25 degree slopes have either tree and shrub cover, if in a grazed area, or are completely fenced for stock exclusion, if part of the 42.6 ha of native bush or 2.4 ha of pines. We have a wetland area that is also completely fenced. We have only one small length of waterway (30% tree shaded in that length) that may require fencing and we have addressed this in our Farm Environment Plan. Our bush area is home to kauri snail, many native birds and other invertebrates. We trap possums, have no goats or pigs or deer. There are tuna (eel) in our stock water dam and streams.</p> <p>We do not cultivate, with permanent pasture cover in all paddocks. Our animals are all for fattening and there are no animals over 30 months old or 600kg. The steeper and rougher areas are in the part of the farm that is the rotation for cattle aged between 8 months and 18 months (smaller, lighter, less damaging). We have a stock water dam and the boundary with our neighbour is their large irrigation dam. Basically, the whole of our farm drains into these two "sediment traps". We have reticulated stock water (troughs), shade and shelter in every paddock (consistent with providing for optimum stock welfare). We are low input, low impact, low stress and low income. Our farming business made a small profit of \$10,000 in the 2022/23 financial year. We take no drawings. There is no budget for capital improvements, much of our permanent subdivision was present at purchase and new fencing has been with single wire electric.</p> <p><b>Managing Highly Erodible Land and Stock Exclusion From Highly Erodible Land:</b></p> <p>Much of the land I see marked in red and yellow on my property, (unless in an already fenced off area) is in small, isolated patches within a paddock. I can identify it without the maps! Excluding these areas from the main paddock area is unfeasible, excluding the whole paddock from grazing makes our farming business untenable. Many of these areas are wooded, totara, kanuka, other shrubs, creating valuable shelter from adverse weather or hot sun. Excluding stock from such areas reduces their ability to seek shade or shelter, scratch themselves or to eat diverse plant species.</p> <p>Permanent pasture with scattered trees and shrubs would seem to hold the soil better than commercial pine forest especially at harvest. Grazing of lighter animals in a rotation with higher residual covers should protect soil from heavy rainfall impacts. Our farming system is designed to protect our vulnerable soils.</p> <p>A Farm Environment Plan (FEP) is a good tool for managing the variability within individual farming systems and settings. The concept of a resource consent to farm the steeper slopes smacks of revenue gathering at the expense of actually managing the risks posed by different farming systems. I believe most farmers are aware of the importance of slope protection. Having NZFAP+ (New Zealand Farm</p>

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		<p>Assurance Program Plus) accreditation would also indicate a higher level of engagement in / striving for positive environmental outcomes for a farming enterprise. The likes of Silver Fern Farms and Fonterra are encouraging better environmental outcomes through the use of such programmes. The NZFAP program looks at outcomes rather than prescriptive processes, eg. here is the preferred method, but if you can show the required outcome by another more suitable/appropriate way for your system, then all good.</p> <p>We would say that factors such as our stocking rate, the age, sex and breed of animals, permanent pasture and grazing rotation all contribute to limiting sediment run-off. The sediment that does enter the waterways is filtered by wetland before capture by the dams at the bottom of our catchments. Is this not an acceptable outcome?</p> <p><b>Stock Exclusion from Waterways and Wetlands:</b></p> <p>I agree that stock should be excluded from permanent wetlands.</p> <p>I believe that stock should be excluded from wetlands that border lakes and dams even if the area is not permanently wet, e.g. water recedes in a drought. The distance required would need to be measured from a "normal maximum" shoreline rather than a flood event.</p> <p>I am very interested in the definitions of waterways. I think some of the mapped waterways have been defined by topography rather than hydrology. There are of course "wet" areas in paddocks that are only wet in the depths of winter or during especially high rainfall events. Fencing these areas would be impractical in the extreme. A farming friend reports that a KMR (Kaipara Moana Remediation) desk-top assessment of a "stream" on her property was later ground-truthed as "not a stream".</p> <p>I am amused by the comments that riparian areas could remain unplanted and be used for hay/silage making. I think this too is impractical, at least in relation to my property. I think large machinery, with mowers for example, is incompatible with endangered wildlife eg. bitterns.</p> <p>KMR suggests 3-5 metre setbacks. I think 10 metres is too restrictive. I agree with averaging. In hill-country, our property included, the suitable line to fence will necessarily be "random" to enable a stock-proof fence with minimal earthworks, footings or excess use of strainers. Most fencing would have to be done manually.</p> <p>Using KMR fencing costs, fencing the one waterway we have identified in our FEP would consume the entirety of our small profit from the previous financial year. We simply cannot afford this.</p> <p><b>Urban Understandings of Freshwater Responsibilities:</b></p> <p>I understand that the concept of the draft policy is to capture all landowners, especially those not covered by FEPs.</p> <p>I think that owners of smaller blocks, not commercially farming, assume that such regulations simply do not apply to them. In our area there are small block owners with no concept of their responsibilities at all. They simply apply the urban rules they know to a bigger parcel of land. The bulk of compliance falls on commercial farmers, if they have no secondary income e.g. work off-farm the farm itself may be in no position to shoulder this burden. Yet urban people and others still complain about the cost of NZ produce they wish to consume.</p> <p>The owners of smaller blocks need to receive targeted information.</p> <p><b>Work Already Completed:</b></p> <p>We have 162 ha. 115ha is grazed. 42.6 ha is fenced off native bush, stock excluded for decades. We trap pests, control weeds and maintain the fencing. The blocks are not QE11. They are voluntarily cared for and protected. We pay rates on land which we enjoy for its intrinsic biodiversity and other benefits, but none of the benefits are financial. Do we get any credit all for work already completed and maintained?</p>
Felice Croft	2 & 4	<p>We have a close relationship with the Northland Wood Council, who have shared some summarised information with wood pine / softwood processors in Northland. Any decisions around erodible land and management of forests could severely impact our supply chain and therefore the success of wood processing as a primary industry in Northland. We share much of the same concerns as the NWC.</p> <p>There are initial concerns around the lack of clarity and wording in the draft freshwater plan change, relating to forestry:</p> <ul style="list-style-type: none"> <li>- Earthworks thresholds around HEL1 and 2 along with outstanding water/lake etc. and inanga spawning sites will apply. Does this override the NES-CF? Is the intent is to control forestry more than</li> </ul>

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		<p>what is currently regulated under the NES-CF what is the intent or justification for this? Following from that, where is the evidence that forestry in Northland needs further regulation?</p> <ul style="list-style-type: none"> <li>- Inanga spawning sites are not mapped but are defined. This will affect many coastal forests.</li> <li>- Resource consent needed for veg clearance (harvest) for trees planted after 1 Jan 2027 in riparian margins and 10m of inanga spawning sites and sites of significance to tangata whenua. Why 10m threshold? Where has this figure come from and where is the justification behind that figure?</li> <li>- Harvest age drastically increases which will result in a larger piece size due to greater age. Local processors may be unable to process these larger piece sizes, so that wood would have no choice but to be exported at a potentially lower price. Reduces value of the log and forces more export. This impacts log supply and flow to domestic processors, disrupting our critical supply chain and putting our operations at risk.</li> <li>- The older harvest age will significantly increase the windthrow risk in forests. Some become so old that it cannot be processed.</li> <li>- A resource consent requirement provides no certainty to the industry and future investors. Where is the incentive for either to continue to invest in Northland?</li> </ul> <p>According to the latest infometric information, relating to Northlands economic profile, on the Northland Inc website, it is clear that forestry and wood processing combined have a significant impact on the Northland economy. We employ a similar number of people to dairy farming and processing. Combined, our two industries contribute approximately 3% to Northlands GDP.</p> <p>The proposed plan does not appear to be clear in it's intent on outcomes, and how it would provide better controls than the existing National Environmental Standards that forestry must work towards. We are appreciative that NRC has chosen to work with the NWC to seek their feedback and to provide processors such as ourselves with the opportunity to provide feedback.</p>
Russell Crompton	2, 3, 9, 11 & 12	<p>(potable water)</p> <p>I have grave concerns about the Money spent by bureaucracy on 3 waters. ( 1.2 Billion ) by last weeks paper(NZ Herald ), the question was asked where the money went ?. Saturdays Herald quoted the \$355,000 redundancy packages to the outgoing CEO's of two the Entities.</p> <p>I'm a senior ( almost 71 Drinking water Operator ), we are operating Barely fit for purpose Water plants. Dealing with high levels of Organics, High ph's, High turbidity, weed and silt blocking intakes in rain and storm events. We don't have raw water storage like larger populated area's to help us through events.</p> <p>Obscene amounts of money spent on consultants writing legislation that might have been better spent at the coal face fixing plant. Bank infiltration would be nice and the real estate to do it.</p> <p>I work for the Community doing my best to provide safe drinking water, but I feel I'm banging my head against a brick wall. I should have retired but there is a massive shortage of skilled people in NZ. The madness has to change.</p>
Mark Croucher		<p>We dairy farm approx. 270 ha at Pipiwai and 200ha at Poroti milking in total approx. 750 cows and carrying all replacement stock</p> <p>We believe in democracy and equal rights for all NZ citizen no matter what their background. We also believe any rules and regulations should be easy to understand ,be cost effective to administer and applied fairly adhering to the above statement .</p> <p>We like the fact that the aim of the focus of the proposed rules are aiming to enhance water quality. However we have some major concerns. Some of these are</p> <ol style="list-style-type: none"> <li>1. Wider Setbacks from rivers ,streams and drains regards fencing. Much of this has been achieved (with NRC help i might add ) and to set further back would severely financially impact or farming operation</li> <li>2. Excluding stock from steeper land. While commendable in some cases this may not be practical .</li> <li>3. While it may be commendable to look at cultural impacts it must be remembered all of our farmed land is privately owned some for 5 generations so whose culture will be measured .</li> </ol>

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		<p>4. Better control of forestry slash that has in the past washed over one of our properties damaging crops, fences and water quality for stock, dairy shed and domestic supply.</p> <p>With regards our brief submission above we would like to heard at any hearings regards the (DFWP) when we have had more time read and interpret the plan as to how it may affect our farming operations. Obviously there may be more things which may want express our concerns about.</p>
David Darker	12	Please do everything you can to preserve and improve the quality of fresh water in our region.
Katy Davidson	1 – 4, 6 – 8 & 11	Agree with the suggested changes set out in the Plan. It would be good to see stock kept out of waterways, native plantings on river banks and better protection of erodible land.
1st Dargaville Scout Group Venturers (Rebecca Davidson)	1 – 4, 6 & 7	<p>The 1st Dargaville Scout Group Venturers would like to comment on the draft rule changes on the future management of freshwater.</p> <p>We agree on the changes you are considering to protect our precious life-giving water in streams, lakes, wetlands, rivers and aquifers.</p> <p>We are concerned when we see livestock and fences up on the edge of the waterway. We agree in planting between the fence and the water edge and making the fence further away from the edge of the water.</p> <p>We would like to see more native plants being used.</p>
Lynda Deacon	1 – 5, 8 - 11	<p>The vision statement beginning in Maori nearly stopped me from reading it at all. I am a New Zealander, born and raised in Whangarei. I do not identify as Maori, English is my chosen spoken language and would appreciate public documents in English first as the primary language spoken in New Zealand. Maori second as the minority of New Zealanders understand.</p> <p>That being said, I think the vision for Northland to move towards protecting our waterways for future generations has to start today. Decades of damage cannot be reversed overnight and setting realistic targets is very important to have cooperation and buy in from landowners. Public support is tantamount for everyone to support landowners and our local farmers while they move forward to providing clean water and controlling erosion. This cost is a public cost as the benefit will be for everyone. Financial support should be provided as a priority to help landowners do the right thing. We are asking a huge amount from them.</p> <p>I think it is short sighted to think that we can prevent soil erosion and protect our waterways with only native planting. This of course is the gold standard as native planting is what was here prior to the land being cleared for human use. Native planting alone in the short term could be supported by planting a selection of exotics that have significant biomass to help stabilise land and providing natives with protection while they grow. The exotics can then be harvested for use and the stump neutralised. The initial cost of exotics is minimal compared to the outlay for natives and may be more attractive to landowners who can use some of the leaf matter to feed stock.</p> <p>Water allocation and management should be shared by all New Zealanders and no ethnic group should have higher claim. This is decisive in the extreme and only builds resentment. Please consider the needs of every New Zealander in this decision making and support our farmers and land owners in doing the right thing to protect our precious resource.</p>
Petra Deutschmann	1 & 6	The farmers and landowners have already changed their waterways! That has cost a lot of money. Is it the intention of the council to get rid of all farmers? Than this proposed draft fresh water plan will certainly do the job. Maybe we should start thinking about human manure. Auckland gives you the idea of what is going on. We as owner of a 2.35 h have our waterways fenced but 10m is totally not workable and would us move away, maybe to a country which is not so crazy!
Lyle Dodds	1 - 12	<p>(Regarding major changes to current land use, draft rules need affected farm owners input before they go in to draft form.)</p> <p>I reject any attempt to insert māori spirituality in to any council rules.</p> <p>It is evident that whoever drew up the proposed rules has not bothered to ask your average affected land owner.</p>

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		<p>The fencing off slope and water areas are extremely stupid. This is being done under the guise of water quality.</p> <p>If the cost of fencing implementation and upkeep and land rental was charged to the council these draft rules would not exist.</p>
Peter Doel	9 - 12	<p>I object to NRC continuing to push racist and apartheid policy and their promotion of tribalism over democracy.</p> <p>Councillors should take note of “All animals are equal, but some animals are more equal than others” (GO)</p> <p>The “Targeted Water Allocation policy” is another of councils blatant attempts to enshrine racism and apartheid into policy – back up and forget it.</p> <p>Councils reliance on the NPS.FM to justify this move is again a devious and gutless attempt to justify racism and apartheid.</p> <p>Councils inclusion of te reo in the communication makes a nonsense of the consultation.</p> <p>By the way Te Taitokerau means the sea to the east of the North Island – how is that relevant to Northland? - Send in the clowns, don't worry they're here</p>
James Donaldson	1 - 7	<p>Hello. With some aghast I have read the bullet points for the draft freshwater plan. I have viewed the map of waterways on our respective properties and the volume of highly erodible land. My points are:</p> <p>What has one ethnicity (Maori) got to do with water quality running off my farms - please explain as it makes no sense whatsoever.</p> <p>If we fence off our highly erodible land (we have pockets of it everywhere), we will end up with small pockets of ungrazed areas on the farms which will grow weeds - who's paying for this?</p> <p>If I fence off 10 m setbacks on our farms on the waterways as indicated, I will lose 20% of my effective area. Some 200 ha or approximately \$4m worth of asset is no longer grazable - please explain how this is funded?</p> <p>Who's paying for the fencing? - some 25 km is required on our properties or approximately \$700,000 capital cost. We could put collars on all the cattle at a cost of \$300000 p.a.</p> <p>These costs are just nonsensical, and will render our operation uneconomic - as will they for many others. Agriculture is the primary source of wealth in Northland. Why impose more cost on agribusiness?</p> <p>While the farms are in my ownership, I will be ignoring absolute junk policy like that has been proposed and lobbying other farmers to do the same. I also will be lobbying hard for heads to roll at the Northland Regional Council.</p>
Fern Donovan	1, 2, 4, 6 & 7	<p>I grew up surrounded by healthy and diverse waterways. I spent my childhood drinking from the rivers and streams that stretched past my house and within the ngahere I worked within. So, when I left home and moved away to the city to study, I was shocked that most people in Aotearoa had never experienced filling their drink bottle up in a flowing stream or slurping up water while swimming through a pristine water hole. It turns out this is an exception. However, I do not believe it should be. I believe everyone in Aotearoa should be able to experience this. I want my children to be able to experience this. Freshwater that is drinkable and swimmable is vital to human existence, it's vital for life on Earth. It is a taonga, but it is also a necessity. For too long, freshwater ecosystems and the flora and fauna they harbour have been neglected. They have been taken for granted and destroyed. Even the awa in which I speak of from my childhood now show signs of human impact, of bad land use and habitat modification. Increased sedimentation from upstream pine plantations and farmed land, fills the interstitial spaces vital for native fish to survive. Exotic weeds dominate large stretches of riparian habitat with biotic and abiotic impacts on the freshwater system. Native forest cover is preferred by most native species. Forest cover or lack of, can have a range of diverse effects on stream habitat. Temperature fluctuations and sun exposure are strongly regulated by overhead canopy cover. Stream channel and bank stability, provision of in-stream debris and terrestrial food availability for fish are all increased with intact riparian margins. Exotic plantations and pastoral landscapes lack the structural heterogeneity of native forest. Non-indigenous forests tend to have limited lifespans due to harvesting.</p>

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		<p>with subsequent repercussions in stream turbidity, sedimentation, and periodic loss of riparian tree cover. I thereby support the idea of restricting exotic plantations nearby freshwater waterbodies.</p> <p>Furthermore, more rules surrounding stock exclusion from waterbodies is essential to the protection and conservation of freshwater in Te Tai Tokerau. I support the idea of a wider fenced setback of either 7 or 10 metres. This will enable more bank stability, reducing erosion and stream turbidity. It is also important in that it allows more space for a wider riparian margin with benefits for both freshwater health and farming, as stock can be provided with shade as temperature and drought extremes become more frequent and more fierce under coming climate predictions.</p> <p>I support the protection of highly erodible land in Te Tai Tokerau. I believe this is well overdue and is absolutely essential to freshwater protection. While I understand there will be a lot of resistance from landowners on this part of the proposal, I hope NRC will not back down from implementing the protection of erodible land. There may be short term economic benefits in continuing to use such land however, in the long-term I believe the costs of not protecting such land are far too severe and far too significant to not do so. Sedimentation from erodible land negatively impacts the drinkability of our waterways for communities, habitat for native fish and the ability for humans to enjoy the outdoors. Freshwater ecosystems tend to be continuous, stretching from the mountain to the sea. Impacts felt upstream affect all parts of a waterbody from that point downstream - even the oceans and beaches which we in Te Tai Tokerau treasure and enjoy. It does not matter how much restoration efforts are made in downstream/lowland habitat if the headwaters of a waterbody are not protected. The headwaters of our streams are typically within steep and erodible land. Therefore, the protection of this type of land is an essential step in restoring and conserving freshwater habitat from the mountain to the sea. Retiring erodible land from forestry and agricultural practices will have positive flow on effects all the way downstream to our precious moana.</p> <p>The failure to protect and restore freshwater habitat and fauna threatens all ecological, cultural, and economic values of Aotearoa New Zealand. Almost all New Zealand rivers running through urban and farming areas (95-99%) carry pollution above water quality guidelines, while most of the nation's wetlands (90%) have been drained. Freshwater ecosystems provide irreplaceable ecosystem services for human society and nature, though current declines in freshwater biodiversity and water health threaten the availability of these services for future generations. Policy changes around increased fence setbacks, protection of erodible land and the restriction of exotic forestry, as outlined in the Northland freshwater plan are absolutely essential for healthy freshwater systems to exist in the future.</p>
Karina Donovan	1 – 4, 6 & 7	<p>Freshwater that is drinkable and swimmable is vital to human existence, it's vital for life on Earth. It is a taonga, but it is also a necessity. For too long, freshwater ecosystems and the flora and fauna they harbour have been neglected. They have been taken for granted and destroyed. Increased sedimentation from upstream pine plantations and farmed land, fills the interstitial spaces vital for native fish to survive. Exotic weeds dominate large stretches of riparian habitat with biotic and abiotic impacts on the freshwater system. Native forest cover is preferred by most native species. Forest cover or lack of, can have a range of diverse effects on stream habitat. Temperature fluctuations and sun exposure are strongly regulated by overhead canopy cover. Stream channel and bank stability, provision of in-stream debris and terrestrial food availability for fish are all increased with intact riparian margins. Exotic plantations and pastoral landscapes lack the structural heterogeneity of native forest. Non-indigenous forests tend to have limited lifespans due to harvesting, with subsequent repercussions in stream turbidity, sedimentation, and periodic loss of riparian tree cover. I thereby support the idea of restricting exotic plantations nearby freshwater water bodies.</p> <p>Furthermore, more rules surrounding stock exclusion from water bodies is essential to the protection and conservation of freshwater in Te Tai Tokerau. I support the idea of a wider fenced setback of either 7 or 10 metres. This will enable more bank stability, reducing erosion and stream turbidity. It is also important in that it allows more space for a wider riparian margin with benefits for both freshwater health and farming, as stock can be provided with shade as temperature and drought extremes become more frequent and more fierce under coming climate predictions.</p> <p>I support the protection of highly erodible land in Te Tai Tokerau. I believe this is well overdue and is absolutely essential to freshwater protection. While I understand there will be a lot of resistance from landowners on this part of the proposal, I hope NRC will not back down from implementing the</p>

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Tania Dunlop		<p>Some questions re the Draft Freshwater Plan Change Webinar 30/11/23:</p> <ol style="list-style-type: none"> <li>1. Does NRC have a legal grounds to force land use change on farmers? If so, we should be compensated for loss of income and loss of value of our properties – has this been considered? If not, why should we stand the cost?</li> <li>2. Has NRC considered the wider economic implications of the stock exclusion policy? I.e. the effect on local businesses and their staff, not just farmers? Given the suggested alternative is wholesale planting of pines, forestry does not require a lot of the businesses we use.</li> <li>3. Has NRC considered the implications of the suggested alternative to livestock of wholesale planting of pines? E.g. possible government measures to restrict doing this, the problems caused on the East Coast with slash, the fire danger, the fact that there is a large sediment problem when harvesting?</li> <li>4. Is the expectation that already fenced waterways will have to be refenced at a greater setback? If so, how is it expected that we will fund this or have time to do the fencing?</li> <li>5. Is the expectation that farmers will have to maintain setbacks and how is it expected that we will fund this or have time to do the work required? I.e. keeping kikuyu under control, keeping other weeds under control, pest control, trying to establish plantings in areas that regularly flood and the subsequent replanting when they get washed away.</li> <li>6. Re waterways testing, I don't know what the problem is on my farm as the water isn't tested so what's the point of a one size fits all rule of fencing and stock exclusion if we don't know that it'll have any effect because we don't actually know what or where the problem is? Firstly the problem needs to be identified – what is it and where is it occurring? Then it can be addressed. We need a simple, inexpensive test we can do ourselves on a regular basis – do such test kits exist and if not are there any plans to develop them?</li> </ol>
Doug Dysart		<p>Recent publicity of cyclone Gabriel and resulting damage from forestry operations has only now highlighted what has long been a problem in Northland. Blanket rules do not adequately address individual situations in Northland and damning reports from the overseas Forest Stewardship Council indicate serious shortcomings throughout New Zealand that have been overlooked.</p> <p>It is imperative that greater consideration should be made when evaluating the setbacks, based on damage shown below. While 10m may be adequate in some instances up to 50m may be needed in others based on slope, soil type and tree species.</p> <p>In December 1984 and February 1985 Northland endured severe flooding, with damage to property resulting from the freshly felled native trees and shrubs being washed downstream from the</p>

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		<p>Mangakahia Forests Ltd project. Fences were knocked out and farmland was littered with debris. On 22nd April 1985 The Northland Catchment Commission having been pressured by the Pakotai Community Committee, decided that better oversight was needed. They introduced controls by way of a permit to restrict and manage the clearing of vegetation from areas greater than ten hectares in one year and the need to mitigate soil erosion.</p> <p>People were affected by another storm in 2002 causing more damage. Pakotai Landcare Incorporated was set up to act on behalf of 17 farmers in the upper reaches of the Mangakahia, Waimatenui and Opouteke rivers and their tributaries. The now maturing pine trees were prone to toppling with the upturned roots resulting in soil disturbance and considerable quantities of soil washed into waterways. Also of concern was the introduction of Manchurian rice-grass into the Opouteke river by a forestry contractor's machine which had further spread more than ten kilometres onto properties downstream. These farmers' concerns resulted in minor changes to planting setbacks from streams and more control over the size of areas harvested with a spraying programme targeting the rice-grass.</p> <p>It is necessary for Councils to play a bigger role in land use and resulting flow on effects, particularly the ownership of areas perpetually in trees that may not be available to produce food later when necessary. It is short-sighted that large multinational corporations are encouraged to lock up New Zealand's land that may be needed for raising livestock or cropping later. It is also morally wrong to support a practice allowing them to continue running dirty factories polluting the atmosphere overseas while the public here are burdened by climate control levies and costs. There is a need to encourage trees of environmental benefit that do not require chemical treatment such as Douglas Fir. Positive steps are required to ensure New Zealand's long term future is not jeopardised by hasty decisions and poor regulations around carbon credits. The high credits given to pine trees compared to indigenous plantings being a concern and disincentive to increasing and retaining native forests. There is a need to re-evaluate how carbon credits are awarded and encourage landowners to prioritise other trees over pine species to support native wildlife and biodiversity. Regional Councils throughout New Zealand have a major role to play in providing solutions and encouragement. Photos I have taken, show damage to streams from failure to enforce rigid planning and management programmes. Trees were planted too close to waterways, too close to boundary fences and the wrong species planted on steep contours and unsuitable soils (photos attached to submission).</p>
Carol Edwards	1 - 10	<p>Vision/Objectives - As a farmer I have as much of a desire to keep our rural land in a healthy state for people as well as fauna and flora. How? By monitoring and gathering scientific evidence of WHO is actually polluting.</p> <p>The current rules regarding discharge to water ways from farming are currently adequate to maintain and improve our waterways. Particular attention should be paid to enforcing our current rules for communities (including Marae), farms, milling of forests and polluting individuals and monitor to eliminate illegal practices. It is important to find the causes of the pollution, when they occur and even if they are natural. (thinking algae blooms, gathering of flocks of ducks). Here we are again changing rules at great expense when we do not enforce the current ones.</p> <p>Managing highly erodible land.</p> <p>Please adequately describe "highly" and then actually define if any stock class could be farmed and in what number. Will the council also eliminate feral goats and pigs from the sensitive areas should none be determined as safe? Once again further thought may be required. e.g. the effect on removing income from farmers who bought the land in good faith suddenly by the stroke of a pen is made uneconomic. Can they afford to retire/ fence these areas off? Will there be financial assistance? A buyback of land? Will the NRC also prosecute DOC for not eliminating these pests on sensitive steep land.</p> <p>Eliminating discharges to water.</p> <p>Once again I feel current rules are sufficient, if monitored and enforced. Our farm on the Opouteke is monitored for fauna and flora and has been for a number of years. Analysis of data tells a story of extreme weather events, the affect of different kinds of forestry practices (early clear felling and planting up to waterways) and roading. Use the data you have! our farming record is clean, with Avian DNA on analysis being only polluter. Our farm drain discharging to the river is cleaner than the river water coming upstream from the forestry!</p>

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		<p>Managing exotic forests.</p> <p>With the huge area in pinus radiata and the economics of alternative farming ( think proposed restrictive slope rules and exclusion zones) Northland is faced with little alternatives to increase forestry. After all, Its costs money to own land, you need a return!</p> <p>This brings a pattern of increased roading, risk of fire, decreased communities and decreased diversity in land use.</p> <p>Careful thought must be given to planting and timing and quantities of harvesting as many mistakes have been made in the past with setbacks too close, too large an area being cleared and tree slash creating dams and downstream effects.</p> <p>Rules should be made at planting with plans in place and before harvesting plan impacts. I am hoping past mistakes will lead to close monitoring in the future. Technology like use of drones and expert knowledge should be where our money should be going.</p> <p>If Tangata whenua are passionate at influencing policy and imparting their values there are already many methods to influence decisions under current rules. They are also farmers and land managers and must take care of their own land too. This a statement without definition. What particular values and what specific impact?</p> <p>Managing exclusion from waterways.</p> <p>I feel I have complied with current rules which I feel are adequate till proven otherwise and it is one more uncertainty potential loss of productive farm land without considering impact on farmers income and welfare or the environment.</p> <p>Timeframes for exclusion areas.</p> <p>A conundrum. It is difficult to change a farming system or practice without sufficient lead in time. Farmers that are demonstrably shown to be having a serious negative impact on the environment should be given assistance to find alternatives.</p> <p>Managing Water allocation.</p> <p>Farmers engaged in historic use of water should be allowed to continue unless shown to have negative impact.</p> <p>Use of water meters on Dairy farms is acceptable to aid management of water.</p> <p>Historic approval of water use should be honoured provided usage is proven to be not wasteful or harmful and is used for its intended purpose.</p> <p>Eliminating Discharges to water.</p> <p>Current rules are acceptable. In the 21st century under current rules there should be no proven harmful discharge.</p> <p>Enabling Tāngata whenua to practice as kaitiaki for wai</p> <p>We are all guardians of WAI, The above is not a definitive statement and too open for interpretation or misinterpretation- Which Tangata whenua? Is this my Māori neighbour, the local Marae? The wider Iwi? As a citizen of Northland it is all of our future interests to be Kaitiaki for the future not one race or group. Please read this heartfelt submission. I have been farming here for over 30 years. I would like my farm to still be here in another 30 years. Measurement is Management and without it there is no informed decision making.</p> <p>As a farmer I am a rate payer and a contributor to the finances that allow you to do manage to ensure the continued wellbeing of the North. Please do your job.</p>
Graeme Edwards		<p>The exclusion of stock from highly erodible land is a gross simplification of the risk of sediment discharge. It takes no account of soil type or distance from waterways and on my gives a misleading impression of the overall contour. I can accept slope as a risk factor, but only if it relates to a large portion of the property. Stock exclusion on the slope criteria would require me to cease farming a significant portion of the property and have a significant financial impact on the business for a small environmental benefit. This is particularly the case in Northland where a farm has more than one land class.</p> <p>The increase in waterway setback is unnecessary. A vast amount of resource has already been invested into fencing and planting of riparian margins. I feel that a minimum of 3 metres and an average of five is a good place to be that balances the need of the environment with our ability to effectively farm the</p>

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		<p>land. The Northland Catchment Commission planted in and around our waterways with poplar trees and has caused a serious environmental and health and safety risk as they topple into the waterways.</p> <p>We can accept an end to the consents to discharge to water, but fail to see what a consent to discharge to land would achieve. The existing rules for the discharge of effluent to land are more than adequate as a requirement for behaviours.</p> <p>We support larger waterway setbacks for exotic forests, but need to consider soil types, etc. as some land is simply not suitable for exotic forestry. In the Opouteke catchment exotic forestry accounts for the vast majority of sediment losses.</p> <p>The change in the priority of water allocation will be economically disastrous for Northland and should remain as it is at present. Tangata whenua values have no place on individual farm decision making. Their input should be restricted to a regional plan based on scientific evidence and not on emotion.</p> <p>We have noticed raising E-Coli levels, my understanding of DNA analysis suggests this is of Avian origin.</p> <p>Tried to send photos, First shows a massive slip in forestry on an unstable slope that should not have been planted. Picture 2 shows the impact on the Haha stream. Third picture shows consequent sediment in the Opouteke River with the clear farm discharge beside it.</p>
Kirsten Fathers	1 - 12	<p>(Hikurangi Flood Scheme for Farmers)</p> <p>The vision, objectives and/or targets for our freshwater future. This is the general overview of the whole plan and it can unfortunately be undermined by a change in government. This process started while Labour held policies and funding and has now been superseded by a National coalition government which will change each and every response below. Unless the appropriate policies and funding are retained, much of these submissions and decisions will be null and void. That is an issue which needs to be addressed. It appears that many farmers are open to engaging with natural biodiversity restoration on their land <a href="https://newzealandecology.org/nzje/3420">https://newzealandecology.org/nzje/3420</a></p> <p>* Managing highly-erodible land. The proposal to exclude stock from highly erodible land is actually about retaining land cover, reducing silt. One needs to keep in mind that the world's steepest street (at its steepest) is 22 degrees. The proposal to exclude stock from highly-erodible land is based on land which is much steeper than the world's steepest street! Fencing concessions are available for this. Farmers should keep in mind that we are all subject to regulations. Home owners , builders, truckers, we all have to comply with rules and occasion new/different rules are applied.</p> <p>* Eliminating discharges to water. It is not okay to continue to allow discharge to water where contamination is known. The potential to affect others downstream is too great. Water can contain bio-hazardous substances, contagious disease, excessively high levels of contamination, the list goes on. It can easily be mitigated. Recently high levels of nitrate have been discovered in Canterbury, one example of why we must work to reduce discharge to water. Particularly as industrial and agricultural practices intensify.</p> <p>* Managing exotic forests. The cost of wilding conifer control is astounding. This is a direct result of a lack of control surrounding exotic tree farming. Silt control once again could be managed. Discharge to water. This industry has all the negative impacts that this survey is discussing. As funding for the mitigation of these side effects is reduced, it would be hugely damaging and backwards to reduce the requirements of this industry to confirm to safe practices.</p> <p>* Managing impacts on tāngata whenua values. When hapu and Iwi sit at the decision making table you know that they have backed themselves with information, science, cultural impact, concerns for their people and environment. They are out there doing the mahi and involved in their community. Steering groups, resource consent processes and so on all need to allow hapu and Iwi to be involved in the decisions and they need to be listened to not ignored.</p> <p>* Stock exclusion – distance from waterways. This goes in line with our waterways, stopping contamination. Excretion can carry nitrates, disease, parasites, affect water quality, contaminate livestock downstream, affect biodiversity, water uptake, the list goes on. Again, there is funding and schemes for this. Farmers should be encouraged to maintain waterways on their properties, they have a responsibility to their neighbours downstream, it encourages business stimulation as fencing contractors live and spend locally. With Up to 50% fundable, there is plenty of advantage to applying this initiative.</p>

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		<p>* Stock exclusion – highly-erodible land. As above in managing highly erodible land.</p> <p>* Timeframes for stock exclusion rules. Sooner rather than later. Our waterways are testing poorly, they need attention before we have a complete breakdown of biodiversity. Many of our farms on swampland are drainage controlled. These waterways don't have the cleansing natural advantage of rocky bottom or natural environment. It is of particular concern in these areas and a plan needs to be in place that doesn't leave these waterways behind. A plan needs to be suited for ALL water bodies. Including man made ponds, man made rivers and streams and so on. Unnatural water bodies were likely made at a time well before intensification of farming practices and well before our current understanding of our natural environment and biodiversity. Therefore, we need a modern plan that drags these old systems into the 21st century.</p> <p>* Managing water allocation. New Zealand is behind the times and heading down the same paths that other developed countries are now moving away from. This topic lacks NZ based research and what research we do have is often being ignored. Regional councils need to pay attention to hapu and Iwi groups who once again, have done their research, they should not be sidelined in these decisions. Those with the most to gain, that fact does not give them the right to steer these groups or decisions. A greed based philosophy does not apply and it will lead to larger issues in the future. More intensity of water use will lead to greater issues in terms of drought, water quality, biodiversity and so on. Over intensification will lead to greater issues in the future.</p> <p>* Enabling tāngata whenua to practice as kaitiaki for wai. 100% Agree with this. Tangata Whenua are community. While most people are busy with their daily lives, hapu and Iwi are out there looking after the land. Tangata Whenua in a Kaitiaki role is essential. They back their decisions with science, knowledge, practical experience, their voice generally comes from a vast number of people / backing. They absolutely need to be heard and involved.</p> <p>* Support and funding for efforts to improve freshwater. This is good for all. It supports locals in terms of jobs, farmers in terms of offsetting costs, conservation and ecological efforts, hapu and Iwi benefit, nature benefits. it is the bridge that mitigates all parties, done right, this is our path forward. Please don't let us lose sight of that.</p> <p>* Something else. Hikurangi Flood Scheme for Farmers. This needs addressing with the whole community. Hikurangi pump scheme is paid for by the community no representation or transparency is seen. It is a plan that needs to be inclusive of all NOT controlled by those who seek to Benefit the greatest.</p>
Marianna Fenn	1 – 6, 8 - 11	<p>I strongly support the draft Freshwater Plan Change and encourage the Northland Regional Council to progress the proposals regardless of what happens in the political sphere or with the Freshwater NPS. While there will be a highly vocal minority that will oppose the proposed changes and seek to continue with the status quo, the vast majority of Northlanders will benefit from what is proposed in the form of flood mitigation, improved drinking water quality, safer recreation areas, enhanced amenity, increased fish stocks in marine areas no longer caked in sediment, etc, etc. etc. We cannot continue with the status quo of abusing freshwater environments for minimal financial gain for a few, Northlanders and our environment deserves better.</p> <p>I am particularly supportive of proposals to exclude stock from waterways, wetlands, and highly erodible land.</p> <p>Given the extent of investment that will be required to establish setbacks from waterways and wetlands, I encourage NRC to take a robust and precautionary approach and impose the full 10m setbacks to ensure environmental gains are achieved. This is a once in a lifetime, if not once in many lifetimes, opportunity to get it right as there will be no appetite to extend the setbacks once they have been established. Recognising the impacts on farms, NRC should ensure it has funding available to support farmers who need it. Ensuring adequate control of invasive environmental weeds in setback areas must be included as otherwise setback areas will act as weed highways for invasive species to migrate through.</p> <p>As regards excluding stock from highly erodible land, these areas are of marginal value from a farming perspective and would be better planted up in native forest for carbon credits. Leaving these areas unforested is not sustainable in the longer term as the soils will just continue to erode away so it is not</p>

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		<p>an option to continue as things are. NRC should ensure that there is support for revegetating these areas and for ongoing control of invasive weeds and animal pests.</p> <p>These changes are urgently needed and we cannot rely on farmers and other landowners to just do the right thing. There has been endless discussion in the media about all the good work farmers are doing to protect that land but the action on the ground in Northland is minimal to non-existent. In our catchment none of the waterways (highland and lowland) or wetlands are fenced, there are frequently large numbers of stock in wetlands and the coastal marine area, and some farmers are heli-spraying many hectares of regenerating native bush on some of the steepest erodible land (presumably in advance of having to comply with any proposed controls over the use of that land). Forestry in the area has been done to just comply with standards resulting on loads of sediment discharging into our streams. Every time the tide recedes from Mangonui Harbour and after every significant rain event there is a huge plume of sediment sucked out into Doubtless Bay. Freshwater biodiversity is just hanging on in some of the more forested parts of the catchment but it will not continue to do so if practices are not improved, particularly with increasing storm events related to climate change.</p> <p>I support tangata whenua being empowered and resourced to take more action in protecting freshwater areas. The whakapapa association and focus on being a kaitiaki of the environment has potential to be a huge positive influence and Maori are entitled to have a greater role in freshwater management under the Treaty of Waitangi.</p> <p>The suite of changes proposed are a great start in our collective efforts to improve freshwater quality and protect vulnerable freshwater environments and biodiversity. Thank you to the staff and experts who took the time to put together this proposal.</p>
Harry Ferguson	1 - 11	I believe we have a crisis on our hands and 'drastic' measures are required. I believe the proposed changes to the freshwater plan are necessary and will be effective. Farmland is not providing anything to the average New Zealander other than out of control food prices and un-swimmable rivers and lakes. It's about time they take the required measures to protect waterways or face the consequences.
Annemarie Florian		<p>I want to express my support for the NRC draft freshwater plan 2023, aimed at aligning with the policy statement for freshwater management 2020. The commitment to significantly improve freshwater health within a generation is a critically important initiative and the proposed plan is a crucial step towards achieving that goal.</p> <p>It's particularly important in light of recent studies by Our Land and Water, and the evidence review undertaken by Foundation North, titled 'Environmental Wellbeing'. Both reports present a stark and concerning picture of freshwater quality across the motu. In the past our freshwater has suffered from both over-management and neglect, extremely detrimental for native ecology and flood management. And there can be no question that urgent and decisive action is needed to address the issues of E.coli levels and sedimentation.</p> <p>In order to minimise both soil water drainage and nitrate leaching, we need to be laser-focussed on best irrigation practices for farmers. It's important that NRC dedicate sufficient funding and staff resources to monitor land use across the region. Current wetland monitoring initiatives should be expanded, wetlands play such a crucial role in mitigating the impact of contaminants and preserving biodiversity. I would specifically urge the council to explore the concept of representing our water in resource management processes as a 'living entity'. This approach emphasises the interconnectedness of our environment and encourages a more holistic understanding of our water resources.</p> <p>As floods hit with growing frequency, natural flood management must necessarily become part of our response, with river restoration (returning rivers and waterways to their natural contours), restoring wetlands and increased native planting near waterways. Floods and drought cost our economy and both are likely to get worse in the future. We need to invest in native planting in particular to hold more water and improve soil retention. Such flood management strategies have been shown to work, and have obvious carbon sequestration benefits.</p> <p>It's easy to forget about the wonder of water. Too easy. Yet it's fundamental to absolutely everything and all too often goes unappreciated. I therefore want to thank NRC for its attention to this matter. The draft freshwater plan acknowledges the complexity of our freshwater ecosystems and will ensure a targeted approach to address our water quality challenges. I trust you will take the necessary</p>

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		steps to fully fund the plan to ensure the long-term health and sustainability of our precious freshwater resources.
Murray Foster	1 - 11	NRC is overstepping the mark and getting far to communistic
Beverly Gailey	2, 3 & 6	<p>General:</p> <p>The Plan has the potential to add costs to small to medium scale horticultural operations while severely reducing the ability to pay for these costs.</p> <p>Proposed Setback rules</p> <p>The proposed rules relating to intermittent and/or ephemeral streams will create a twenty metre wide fire hazard in dry years .. Many of these 'streams lead directly to farm residences, outbuildings and/or forestry plantations. Reducing the width of these setbacks will not eliminate the hazard as fire, unlike water, tends to run uphill. The requirement to fence intermittent and ephemeral streams should be removed from the Plan.</p> <p>1 Smaller horticultural properties should not be disadvantaged by the Plan. Clarification whether the Plan's rules apply to all rural properties is needed. A ten metre stock or land preparation exclusion will fragment operations on many now productive small blocks.</p> <p>a) Some 'lifestyle blocks' in Northland are one hectare or less in area. Even a quarter acre section may have an ephemeral stream during or following rain events. Many horticultural operations are carried out on small blocks.</p> <p>2 Clarification is needed where a stream, permanent or ephemeral, is less than 10 metres from a boundary.</p> <p>a) Is the neighbour whose property does not contain the stream responsible for fencing on the adjoining property?</p> <p>3 If an ephemeral or intermittent stream adjoins a driveway or farm road, does the driveway or road need to be moved? Where an access is not able to be moved, will a property become landlocked?</p> <p>4) * Clarification is needed on landowners' ability to manage weeds on a setback area</p> <p>a) Weed control on setbacks should be a permitted activity.</p> <p>b) The high growth rates of some weeds in Northland's summers, especially after rainfall events will outstrip both NRC's ability to issue consents in a timely manner</p> <p>c) For some weeds, for example, kikuyu grass, the most effective control is intermittent grazing. A blanket stock exclusion rule, especially for 'ephemeral streams" will disadvantage horticultural operations that use stock as part of a rotation or to manage vegetation.</p> <p>d) Vegetation removal (including minor earthworks) to manage fire risk on a setback should be a permitted activity</p> <p>e) Chemical control of weeds on setbacks should be a permitted activity provided the current rules for spray use are adhered to by the landowner.</p> <p>f) Will earthworks to redirect 'ephemeral' or 'intermittent' streams so as to minimise loss of usable land be a permitted activity?</p> <p>g) Does the Plan allow for different soil types when defining an intermittent or ephemeral stream? For example rain runoff continues much longer on soils such as Waiotira clay, as opposed to sandy or volcanic soils.</p> <p>h) Fencing twenty metre wide strips through productive paddocks has the potential to make cultivation of leased land for horticultural crops uneconomic. Leasing suitable pastoral land for horticultural purposes should be encouraged as a method of avoiding constant cultivation of a limited area, a non chemical method of interrupting parasite life cycles and a prelude to regressing.</p> <p>Managing highly erodible land</p> <p>It is not sensible to make blanket rules for all of Northland, which has a notoriously variable geology. Much of this should be managed on a catchment by catchment basis.</p> <p>Discharges to water:</p>

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		WGM supports the separation of farm and horticultural wastewater discharges
Russell Gant	2 & 7	<p>I have a 4 acre lifestyle block at Whananaki which would be considered too steep to farm cattle on with the new plan change. Despite having a fenced off waterway with riparian plantings at considerable cost .</p> <p>With a super low stocking rate the impact to the land is minimal .I also monitor there grazing in the winter to eliminate "plugging" .</p> <p>I'm appalled that the NRC is considering taking the right of me to rise livestock on my land so I can feed my family .</p> <p>In the "Cost of living Crises "times ,I value the right to grow beef to support my family and will be "bloody pissed off" if that right is taking away from me .</p> <p>I consider I'm doing all I can to minimize runoff and are aggrieved that I'm being included in such widespread changes . You don't have my support for the new proposal in it's present from .</p>
Charles Garton		<p>Hello. we are farming in the Kaipara, we own 2 dairy farms and a beef farm.</p> <p>Going over the 3m set back that we already have in place on our farms would have a significant impact on our business. The area lost in grazing for starters then the flow on effect of then having an ungrazed area where weeds flourish and then seed the rest of the farm resulting in greater weed control measures having to be used having a negative effect on the environment, our time and money. We currently implement a grazing rotation using 2 different age groups of cattle to best utilize our pasture and minimize any need for weed control.</p> <p>There are already rules and regulations around grazing steep land essentially taking it away from farmers and now with the possibility of 10 meter setbacks it takes away the flatter land around drains and creeks leaving us with very little to try and make a living off.</p> <p>Think long term. NZ can't be green when farmers are living in the red!</p>
Anthony Giesbers		<p><b>Stock Exclusion - Distance from Waterways</b></p> <p>We agree that stock need to be excluded from waterways.</p> <p>We disagree with increasing the setback beyond 3 metres especially for intermittently flowing streams, some of which are little more than drains. We have fenced many streams on our farm with set backs that are variable according to contour and aspect with the many changes of direction of these streams. In our experience the wider the corridor the more weeds that need to be controlled and the greater the difficulty in controlling them. We also contend that grass is a better filtration medium than most native species. Mature trees give virtually no filtration benefit, in fact they suppress most other vegetation. Our farm is on a flood plane. The highest points on the farm are adjacent to the river. There is little benefit in creating massive setbacks as there is little overland flow towards the river.</p> <p><b>Dairy effluent discharges to water</b></p> <p>We agree that these discharges to water be no longer allowable. However there may be instances that trigger a discharge because of adverse events.</p> <p><b>Dairy effluent to land</b></p> <p>Dairy effluent to land should remain a permitted activity and be dealt with through farm environment plans and within clearly established rules. It makes no sense to create a bureaucratic process for what is essentially currently best practice.</p>
Adrian & Judi Gilbert	1 – 7, 10 & 11	<p>The RMA had a requirement for councils to formally notify their proposed freshwater plans by the end of 2024. Now councils have until the end of 2027 to notify their plans. The current climate crisis situation needs to be taken seriously and this delay is not beneficial to our environment which supports us. We request that NRC seriously considers the climate crisis in its Freshwater plan and makes all endeavours to notify the changes as soon as is practicable.</p> <p>Our understanding of Te Mana o te Wai is about recognising the vital importance of clean, healthy water for maintaining the health of our waterbodies, freshwater ecosystems and the communities that rely on them for their sustenance and wellbeing – surely that is all of us in New Zealand not just tangata whenua. If the government is intending to change the National Policy Statement on Freshwater</p>

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		<p>Management and change Te Mana o te Wai, we request that NRC retains Te Mana o te Wai at a regional level for all Northlanders, even if it is changed/revoked at a national level.</p> <p>Having been farmers ourselves owning two farms with different terrain and soils we believe we have the experience to comment on some issues in the draft Freshwater Plan Change.</p> <p>One farm with predominantly clay soils, ranged from river flats to rolling hills with some steep faces. Initially we raised beef cattle and later converted this farm to a dairy unit. Before it even became policy, funded or fashionable we fenced off some of the waterways and covenanted and fenced off small pockets of native bush. It just seemed to be the obvious thing to do witnessing erosion on steep slopes especially after tropical downpours on what we termed 'sticky back' clay soils which, when waterlogged, slid off a lower layer, and grazing under the forest canopy which was not regenerating and showed signs of slowly dying. The compacted bare ground under the forest canopy was allowed to regenerate and accumulate organic matter which would have created a sponge effect slowing water flow. NRC should put plans in place to encourage non-productive land, highly erodible land to be fenced off and allow to re-wild using native vegetation.</p> <p>In the 1970s - 80s farm advisors encouraged us to drain our wetlands which for the sake of production we thought a good idea. Fertiliser representatives visited and pushed us to apply more and more of their product. By the 1990s we changed our farm policies and with the fencing of some creeks we saw the value of this. We regret that we only fenced off a short distance from the riverbanks. Now, with greater knowledge of the benefits of wider setbacks from waterways we encourage NRC to include in its draft Freshwater Plan a wide setback of a minimum of 15m on flat land and on hill country 20m or more.</p> <p>NRC to legislate to protect what we have of all remaining wetlands and compensate owners for restoration of drained or impoverished wetlands. All private land set aside for rewilding should be recognised with rates rebates and eligible for funding assistance.</p> <p>With one of the adjustments to our farming policy we reduced the standard amount of fertiliser applied to the land. After employing a soil advisor, we had a fertiliser mix tailor-made for our needs and this was a cost saving in addition to being kinder on the environment: reducing fertiliser discharge into waterways and aquifers and ultimately reducing flooding. Does NRC consider the amount of artificial fertiliser applied to land and how well the ground is suited to absorb these nutrients? Regenerative and more sustainable farming is practised more widely and with soil structure analysis, earthworm concentrations and pasture plant root length being some factors of good land management these assist in water penetration and mitigating water run-off. Makes sense if we want clean, swimmable rivers and lakes, safe drinking water and kinder environments for nature to flourish.</p> <p>Where practicable stock should be kept out of waterways for their main water drinking source. We continue to witness cattle pugging the edges of streams and eroding banks. Robust policies and monitoring should be in place to prevent stock in waterways.</p> <p>Our other farm was flat peatland with large county drains dissecting it. It was treeless other than trees round the cottages but after about 10 years of owning it we transformed it by planting thousands of trees. We received permission from the regional authority to fence the county drains and plant trees to enhance the water quality and provide a humane environment for the dairy cows (shelter and shade). The effluent systems at both farms already had strict requirements to be complied with. Surely requirements for dairy effluent in Northland are currently strict and perhaps it is the monitoring that should be more stringent. However, if NRC feels greater measures are needed to prevent dairy effluent and any intensive animal farming effluent entering waterways then it must put measures in place to do so.</p> <p>In our penultimate year of dairying, we were encouraged to enter the 2002 Waikato Farm Environment Award for which we were a finalist and received a Special Achievement Award "for a superior level of attainment in productivity and environmental improvement". We particularly mention this as there is a perceived attitude that setting aside land for tree planting takes away land for production. We proved this not to be so. The judges' comment in their report to us said: "Your farming enterprise balances high productivity with environmental sustainability and is an inspiring example of best practice management worthy of championing to other land managers". So how can we champion best practice land management? Hopefully NRC will find an answer.</p>

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		<p>Many who work on the land regard themselves as guardians of the land with the attitude “The Earth is on loan from our children. Let’s treat it well”. People working on the land provide us with the resources and food we need to live and prosper and we do not want to be importing product which can be raised/grown within New Zealand. It should not be made too onerous for our food and timber producers to continue with their enterprises but the urgency of the situation we find ourselves in (e.g. climate change, pollution) calls for robust policies. All means of encouragement, funding, compensation for example setting aside wetlands, hands-on assistance and education should go towards helping to prevent flooding, reduce erosion and sediment run-off into our lakes, rivers, and oceans.</p> <p>The area where now live, Ngunguru, has a significant estuary draining a large hinterland where there are tracts of plantation pine forests and farmland. Often after heavy rain this river runs brown, and tons of sediment flows out into Ngunguru Bay. There is a rahui on collecting shellfish in the area due to their decline and it is supposed that the cause is the volume of sediment flowing regularly through the water. The late Wade Doak was so concerned about this that he prepared documents with evidence and shared them with many including NRC. A major concern is the steep forested slopes ending at waterways with the barest minimum of riparian setback currently in place. NRC should include a plan change of a large setback of no less than 50m on slopes of any degree. A family interest in a wilderness block some years ago came to a halt when the vast neighbouring sheep and beef station was sold to a major, overseas owned forestry company. We witnessed the most horrendous assault on the land with huge equipment carving roads into mountain sides in places one would have thought it was impossible to create access. The thought of being enveloped by pine forest in years to come and in 20 years or so witnessing a harvesting exercise, the decision was made to sell the wilderness. The family were delighted that the new owner was to run it as a wilderness hunting experience but some years later it was sold again, and Google maps now show it dotted with pine trees. No amount of silt traps and mitigating measures put in place can stop the erosion which will ensue, weed proliferation and sediment nuisance. There should be clear direction where exotic plantations can or cannot be established anywhere in the country and regional plans should notify these.</p> <p>We live on the edge of a coastal village with a backdrop of steep hills with a mixture of pasture and native forest slopes. When some illegal earthworks and indigenous vegetation clearance was undertaken about 20 years ago, we were horrified to learn that a certain volume of earthworks and area of indigenous vegetation could be undertaken annually. So, the mistake that particular landowner made was doing the work all in one hit rather than bit by bit over a few years: the same area ultimately gets degraded even if through ‘death by a thousand cuts’. Areas of steep, undeveloped land with erodible slopes covered in scrub, regenerating forest or pasture in whatever the District Council zoning is, should be classified as highly erodible land. Obviously Rural Residential zoning is more at risk of subdivision. We ask that NRC considers in the draft Freshwater Plan tighter rules to limit vegetation clearance, land preparation and earthworks on steep, erodible slopes and not allow piecemeal removing of earthworks and vegetation clearance over a time. Also, NRC to include legislation to stop wetlands being drained and filled in for land use and development.</p> <p>We do not agree that more activities could need cultural impact assessments for resource consents. These CIAs can delay processes, can be fatuous and, as experienced, can be a generic template presented at great cost. Extra costs on some occasions are the number of ‘consultants’ that materialise when one or two should suffice.</p> <p>If there is not tangata whenua participation in freshwater leadership, management and decision-making then their participation should be encouraged. We do not agree that there should be increased participation if it is not on an equal basis of all stakeholders. We have worked closely with Māori and, having once been supportive of tangata whenua values, we now are noting decisions being made in favour of tangata whenua on the grounds of race rather than merit. Government departments, projects, policies, individuals may feel reluctant to balance this bias for fear of being called racist or, as witnessed, patronising white colonialists. We are in favour of working in equal partnership with tangata whenua. While many are true kaitiaki there are many more who just state that but are far from being guardians of the land and water – just as in any society.</p> <p>We do not understand “allocating water for environmental enhancement, to recognise the relationship tangata whenua hold with wai, and to preserve Te Hurihanga Wai (the hydrological cycle)”. We have</p>

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		<p>seen how some tangata whenua have stressed their kaitiakitanga role but in reality, some just pay lip service to this concept.</p> <p>A plan change in the draft Freshwater Plan is to eliminate, reduce or phase out household wastewater discharges to water. We are in favour of this change but how does NRC plan to do this? We have concerns that Papakaiainga Land appears to have different rules from some sections of the community. Multiple dwellings, most with no resource or building consents, appear on this land and it is questionable as to where household wastewater goes, especially if close to rivers and the sea. Without proper wastewater facilities it is of concern that at times of large family gatherings and flooding events there is risk that household wastewater discharges to water.</p> <p>We conclude by saying the Earth belongs to us, our children and their children. Being kind to our environment is not a trend or a fad. It demands a change in attitude and, in some cases, in the way we do business. Let's work together.</p>
RA & BJ Gillatt	2, 4, 6 - 8	<p>I have read the discussion document and wish to comment on it, with an emphasis on stock exclusion. We have a 104 ha coastal beef fattening farm and I have read it with this in mind. My comments are:</p> <ol style="list-style-type: none"> <li>1. How far away from waterways should stock be kept? 3 metres. This is because this is practical, it makes it 'do-able' for a digger to reach over and clean out sediment without destroying any plantings or intensify the use of glyphosate near drains &amp; waterways. The other distances are too impractical, especially the 10 metre one, in that several flats would not then have enough room to graze. With respect to the averaging approach, this would be viable when contours and narrow valleys with limited space were involved. To avoid confusion, keeping to the 3 metres distance would be more practical. With respect to the riparian vegetation plantings, we would like to see plants that grow well or endemic to the particular area grown. In our case, only few scrub grow here and kikuyu is so prolific (Redhill sandy loam) it would be appropriate to allow kikuyu to grow. absorption any runoff. The planting &amp; maintenance will be time consuming and so cost prohibitive and there is a risk of spray entering the waterways.</li> <li>2. Should stock exclusion rules apply to highly erodible land? Yes definitely. Highly erodible land will slip away anyway given or not but it will also erode if trees are planted anyway. You only need to look at the structure of the Northland soils – sand, clay, limestone and realise this. Look at our forests and the slips there. Cattle will hasten this if heavily stocked because of constant walking &amp; over grazing. I do not believe pine trees (exotics) are the answer to the problem, however. Native vegetation endemic to the area is more appropriate in many places. I believe we are setting ourselves up for de-population in Northland due to a lack of regular jobs due to forestry going in. I also believe we are creating a future problem with out-of-control wilding pines in our precious native plantations. Our dune lakes will be no longer thanks to pines drinking 90 litres a day each. Land identified as "land 2" should be fenced off not "Land 1" (25%) as 'land 1' is able to be farmed without any fear of erosion or soil loss (low stocking grazing light &amp; no crops there)</li> <li>3. What rules should be for excluding stock from wetlands? It is an important part of our ecosystem. We should exclude stock from existing wetlands. The definition of a wetland should be that there is water in it for at least 10 months of the year. It also should be fenced off. Because this runs off and feeds our streams, birdlife, especially mallard ducks, shelduck, swamp wildlife – possums and rabbits, should be managed to reduce the E.coli. in our streams.</li> <li>4. Should stock exclusion be extended to apply to other animals? Yes definitely. Please don't forget we have wildlife that contribute to our malaise over water quality and erosion – birds (ducks etc) ad possums &amp; rabbit. Their effects need to be taken into consideration and their populations managed. It is for you to take a lead on this.</li> <li>5. Timeframes for achieving stock elusion rules. The time frames of 500 3m by 2025 are feasible. Given the state of the economy, and pressure farmers are under, small blockers having limited development finance, this should be phased in and monitored. I think of the Farm Settlement Act where a farmer had to break in 10 acres a year to keep the right to farm the land (1870s to 1930s) . we should use the same principle – marching on in small increments. Plant species endemic to that area, or in our case let the kikuyu go – that's what it was introduced for, erosion control. Nurseries should be set up, dare I say it, using unemployed to keep the costs of the</li> </ol>

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		<p>plants down. Spray bulk bought. Teams offered to help with fencing &amp; planting. Work with the farmers, not against them.</p> <p>6. Managing exotic forests. A policy to restrict exotic forests to certain classes of land (highly erodible only) and application should be made to get a permit to plant. Permits should be sought to replant to ensure good land is not lost to an unproductive component of our economy. Research &amp; trials should be done to find alternatives to pine as well as development of industries using our pine locally e.g. sawmills, wood product factories to- keep employment here. Pine forests should have a distance from natives, especially our large native areas, to avoid a run-away explosion of wilding pines. Climate change and a pristine environment should not be our ultimate goal without looking at the effects of the people being considered &amp; the consequences of trying to achieve 2 holy grails. Please, please you are here for all Northland people whatever race &amp; creed. We all want the same thing, but we also realise there will have to be compromises to achieve a balance with the people &amp; the environment we live in – we cannot survive on trees!</p> <p>Farmers are hurting, work with them, find a way we can all win, yet achieve the end goal. Farmers have motivation themselves to protect their environment and know their land best. Respect this and walk alongside them.</p>
Drew Gillespie	2, 6 & 7	<p>We have concerns about the proposed rules around highly erodible land and the harshness of suggested conditions. We have completed a Fonterra Farm Environment Plan that covers erosion control. There are management plans in place to reduce the risk of erosion and sediment loss into water ways. We have already identified steep areas may very well be fenced off and planted out as pasture quality is difficult to manage in those areas anyway.</p> <p>Significant drains on the farm already have 3metre setbacks, some of which are council controlled. The drains not under council control have been planted out. Any further setback would eat into productive farm land, reducing area available to graze cows on at cost to the business. From our observations the existing 3m setbacks are achieving the purpose of reducing sediment/contaminants getting into the watercourses.</p>
Donald Gillett	2, 4, 6 & 7	<p>1. Setbacks for cultivation of paddocks with intermittent drains means that a massive amount of our farming area is rendered unusable to grow feed for our livestock. This means that larger areas of the platform have to be taken out of the round for stock, to enable us to grow supplement. This means higher costs for our business, higher input and less return.</p> <p>This measurement of setback is unworkable on our farm.</p> <p>2. The high erodible land area on our farm as marked by the Regional Council, is mainly in trees now and or fenced off. An area that shows up as erodible are where we have planted some in pines and the rest is kikuyu pasture which is lightly stocked all year round. I believe that this management means this area is not highly erodible due to the way we manage it.</p> <p>3. Where I notice any areas of erosion, we normally plant this area in poplars. It is hard with time and the available funds to do everything and do what we can when we can. I have concerns about pines and the effects on the environment.</p> <p>4. We are concerned with the effects of pines being planted on the environment. They are not a tree to survive some adverse weather events and can cause more issues.</p> <p>5. We can't afford to plant the erodible land in preferred natives due to the cost.</p> <p>6. My concerns around effluent discharge are:</p> <ul style="list-style-type: none"> <li>- How can farmers have enough storage to cope with a meter of rain.</li> <li>- The engineering of ponds means that without discharge, if water in an adverse event goes over the walls of the ponds, the pond structure can be jeopardised from an engineering point of view - where is that effluent going to go? Engineering needs to be considered here as well as health and safety.</li> </ul> <p>7. When having to retire land from grazing and production, some people have suggested a rates rebate. This would not compensate land owners for their loss of production and income. It would be insignificant.</p>

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		<p>8. Weed burden: In any buffer area, weed control becomes an issue as we can't manage the huge area of weeds while establishing plants. Kikuyu in my opinion is just as good if not better at reducing erosion and we can manage it.</p> <p>9. The consenting process needs to be at a level that it doesn't make farming unprofitable. When we have already paid all the legal costs to build our dam to save water, we are then penalised for building the dam by having to pay for consent for water use. It is our own water and we are managing it ourselves. I would happily pay for it if it was provided by council and was clean.</p> <p>10. We need to keep things simple and not double up. For example, we need the Fresh Water Farm Plan to take over the Farm Environment plan. This also rewards us for all of the work we have done to date. A consent process for grazing of erodible land is not workable. We need the erodible land to be in our Fresh Water Farm Plan with a plan on how we manage it.</p> <p>11. As farmers we have invested massive amounts into our infrastructure such as herd homes to protect the animals, the pasture, the soil and water ways in adverse weather/winter. We focus on soil and pasture protection and want clean water to run through our cowsheds for cooling the milk and washing the plant as well as for our stock to drink. We are striving for our environment every day to leave it in a better state for the next generation. We need to make sure the next generation is able to farm. We need to make sure government and local body regulations are logical, practical and sustainable for the future.</p> <p>12. The tangata whenua cultural impact statement is segregating us as kiwis, and giving power to people who have no stake in my land or my business. This proposed consultation could effectively ruin my ability to run the farm, and destroy my business and family. I see it as frightening and unworkable. We have no idea how this would work, time frames involved when time is of the essence, this could inhibit the running of the business. This could also break down community relations.</p>
Angelina Goodhew	2	If this plan goes ahead the Whenua we are farming will not be viable as a living.
Calvin Green		<p>I am writing to express my strong support for the draft freshwater plan changes proposed by the NRC. I commend the council's commitment to meeting the government's requirements for freshwater management with the aim of improving freshwater health in New Zealand within a generation.</p> <p>I would like to highlight a particular concern regarding the need for NRC to invest in compliance costs for the implementation of Tangata Whenua-focussed provisions. It is particularly pleasing that NRC has entered into an agreement with Ngā Kaitiaki o Te Roto Ōmāpere committing to improve water quality and biodiversity of the lake.</p> <p>Now take it further! Specifically, I urge the council to explore the concept of representing our water in resource management processes as a "living entity". This approach aligns with an holistic understanding of water resources and emphasises the interconnectedness of our environment. The discharge of wastewater into such rivers as the Ōmanaia Awa on the Hokianga has never been acceptable; dilution is not an acceptable form of treatment for human waste. NRC must continue to develop and improve sustainable alternatives.</p> <p>NRC should expand its current wetland monitoring initiatives and establish a comprehensive programme to monitor threatened species, both flora and fauna. Such monitoring would contribute to the success of the "living entity"; representation and would be a valuable tool in assessing the overall health of Northland's freshwater ecosystems.</p> <p>In light of past incidents involving prominent and well-connected farmers who intentionally flouted environmental rules, such as the case of Bill Shepherd and Robert Phillip, I would emphasise the importance of NRC taking decisive action. The reputational damage resulting from such incidents underscores the need for vigilant oversight and robust enforcement measures to ensure accountability for all members of the communities you serve.</p> <p>The lack of re-election of Bill Shepherd should serve as a clear signal for a change in direction at NRC. I urge the council to prioritise its mandate to protect and support a healthy environment for all residents, rather than catering to the interests of a select group. NRC's responsibility to safeguard our water, air and land should always take precedence over other agendas, including those relating to economic growth.</p>

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		In conclusion, I encourage elected councillors to adopt and fully support the initiatives in the draft freshwater plan. By so doing, the council will fulfil its very significant role of ensuring the long-term health and sustainability of Northland's freshwater resources. Thank you for your attention to these critical matters, I trust you will take the necessary steps to adequately fund an environmentally conscious future for our region.
Simon Green	1 – 3, 6 & 7	I support the NRC's plan to improve water quality overall and in particular with respect to limiting erosion, stock effluent and other damage, and other discharges into fresh water channels and lakes. The NRC should resist pressure from farming and industrial groups who wish to continue to pollute our vital freshwater sources.
Michael Groome	2, 4, 6 - 8	The proposal of excluding stock on erodible land, impacts my business and my family because 70% of my farm is 25% plus of the suggested grade of slope being proposed. I have already actively fenced off 75% of waterways/drains. The proposed extensions for the distance of fencing from waterways is not viable financially. There should be stricter controls around forestry especially around harvesting and the practices of defoliation prior to replanting.
Jarrold Halse	1, 3, 5, 6, 9 - 12	The vision is not clear in English. You have Māori words that do not have English substitute words. I can't read or understand Māori? Can you provide in proposed changes the English version of the Māori words so I can understand. Why do we need to limit farm effluent discarding to water that meets discharge requirements. Large cities can discharge untreated human waste into water and don't get fines or contribute into a fund. They have had years to fix and you want farmers to pay to fix the Cities. Large developers should have paid for this not the poor farmers. Why have the river fence setbacks changed. Again who pays for this mistake. Please explain what Tangata Whenua means. In my experience with a fund it's who you know, not what you should get. Permit and consent for water. I don't have a permit or consent and take water from river. How does this work and are you going to change for this. If the source is on the property can I change others? Who owns the water now? Is this just another Tax for Farmers.
John & Marianne Hamilton	1, 2, 5 – 8 & 10	<b>Vision</b> A laudable vision but one that doesn't take into account the social & economic costs to the rural community as they wear the brunt of the costs. It seems that the efforts that farmers have already put into environmental activities isn't acknowledged or valued. We personally have spent a considerable amount of time & money fencing off waterways & wet areas at our own cost. But its never enough for the eco taliban that run council, sitting in their nice air conditioned offices, driving their council supplied cars etc. etc. As a aside not one person - council, govt ,police, civil defence, etc made contact, little only came up our road to help during cyclone Gabrielle. <b>Stock Exclusion.</b> As far as I am concerned this is legalized land theft. I am no longer able to use my land to do what I wish with it. It also presumes that farmers / land owners don't know how to look after/stock their land. So if you take a sample 100m strip by a 3m setback I loose 300 square metres, 500 metres for a 5 metre set back & 1000 metres for a 10 metre set back. Then double it as streams have 2 sides. I , like most farmers, have considerably more than a 100m of waterways. Costs - who pays for all the fencing & are you going to compensate farmers for the ongoing loss of their land? it should be yearly lease payments for the land you are planning to steal, determined by farmers not NRC

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		<p>No doubt NRC will still hold out both hands out for their rates payments, yet they reduce the farmers ability to actually make any money to pay the said rates.</p> <p><b>Time Frame for rules.</b></p> <p>Sound like its already decided if you are talking time frames for implementation. Whatever time council thinks it will take, it will take longer &amp; it will cost more than what council thinks.</p> <p><b>Highly Erodible Land</b></p> <p>Again this is just legalized theft of privately owned land. When you look at the map you see a sea of red &amp; yellow.</p> <p>The question here is, does the council want a farming industry in Northland or not. This rule will effect the majority of beef farmers in Northland. It will make a number of them unprofitable &amp; send them broke.</p> <p>Basically what you are proposing is land that would be stocked to run store (young) cattle or sheep on it can no longer be used. The farms will be sold to forestry &amp; it will be planted out in pines. Well done council - you destroy hard working farmers lives &amp; create a green desert. And also destroy communities.</p> <p>Who is going to clean up the social consequences of this mad decision - the eco Taliban that are running NRC. Yeah right.</p> <p><b>Consulting Iwi</b></p> <p>I strongly object to having Maori values being given precedence over everyone else's values. We should have equal say about the environment etc. I also strongly object to been forced to consult with Maori via the RMA. So on one hand the council is doing its best to send farmers broke by stealing their freehold land &amp; then at the same time increasing their costs by forcing them to consult Iwi.</p> <p>If Maori wish to practice their cultural beliefs, that's fine with me, just don't expect me to pay them for it, or partake.</p> <p>The other point I would like to make I find it culturally offensive to have Maori myths &amp; beliefs shoved down my throat as fact. They clash with my own religious beliefs, which are ignored.</p> <p>I wish to appear in person at the hearings please advise a date &amp; time.</p>
Penelope Hansen	1	<p>I support the Freshwater Plan change in its draft form. It is vital that any freshwater management to be based on scientific evidence. I am hoping this can be done with cooperation from iwi and farmers and that it will be possible for the benefits of cleaning the freshwater can be conveyed successfully to all. This will need significant funding and funding this initiative must be a priority for this region because of the importance of the waterways and their connection to the Kaipara harbour.</p> <p>Personally I have no scientific or local expertise to contribute except the knowledge that cleaning the waterways is essential to the future of our region, our country and our planet. Thank you for the opportunity to contribute.</p>
Allinda Hardwick	1 - 12	<p>Generally speaking this all sounds like sensible and logical changes to make, and are ones that are needed - and need to be done as soon as possible. Sooner rather than later.</p> <p>It doesn't make any sense to have stock on land that is eroding and there should be moves to planting up land which is like that. Stock should definitely be kept well back from waterways to avoid contamination, as with the fertilisers and sprays used by farmers etc.</p> <p>The vision, objectives and/or targets for our freshwater future:</p> <p>This could unfortunately be undermined by the change in government to this National coalition government. This process started with Labour and the change in government leaves things vulnerable - unless appropriate policies and funding are retained. Farmers seem to be open to engaging with improving natural biodiversity and restoration on their land <a href="https://newzealandecology.org/nzje/3420">https://newzealandecology.org/nzje/3420</a></p> <p>Managing highly erodible land:</p> <p>Excluding stock from highly erodible land is really about retaining land cover and reducing silt. Fencing concessions are available and like everyone else, farmers are subject to regulations too – we all have to comply with the rules, be they established or newly instated / applied.</p>

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		<p>Eliminating discharges to water: The discharge of contaminated water has to stop – contamination is a serious threat that can affect habitats, animals and wildlife, land and humans alike – and steps can be taken to mitigate it. Agriculture and industries need to be made to step up and take responsibility, particularly as practices increase and intensify.</p> <p>Managing exotic forests: The cost of wilding conifer control is astounding and is the result of a lack of control surrounding exotic tree farming. Silt control should be managed, and discharge to water. This industry continues to contribute to all the negative impacts that this survey is discussing, and again, they should be taking responsibility to clean up after themselves. It would be hugely damaging and backwards to reduce the requirements of this industry to conform to safe practices, or to self-regulate in some way – that has been shown not to work, time and again.</p> <p>Managing impacts on tāngata whenua values: Hapu and Iwi are out there doing the mahi / work and are directly involved in their communities and they should be enabled to speak and be listened to with consideration.</p> <p>Stock exclusion – distance from waterways: Excretion from stock can carry nitrates, diseases and parasites which affect water quality and can contaminate livestock, habitats and wildlife downstream. There is funding and schemes to mitigate through fencing and riparian plantings. Farmers should maintain the waterways on their properties as they have a responsibility to their neighbours downstream.</p> <p>Stock exclusion – highly-erodible land: As above – farmers should utilise schemes to mitigate impacts through fencing etc.</p> <p>Timeframes for stock exclusion rules: ASAP – our waterways need attention before there is irreversible damage and a breakdown of biodiversity. Many farms on swampland are drainage controlled, and these waterways require attention / maintenance because they lack natural cleansing mechanisms. A plan is required to work for ALL water bodies, including man-made ponds, man-made rivers and streams and so on – these were likely created before intensification of farming practices and well before our current understanding of the natural environment and biodiversity. Therefore, we need a modern plan that drags these old systems into the 21st century.</p> <p>Managing water allocation: New Zealand lags behind and is looking at paths that other developed countries took but are moving away from. The increased intensity of water use will create greater issues in terms of drought, poor water quality, reduced biodiversity, habitat loss etc – over intensification will lead to greater issues in the future.</p> <p>Enabling tāngata whenua to practice as kaitiaki for wai: Tangata Whenua are community and while people are busy with their daily lives, Hapu and Iwi are out there looking after the land. Tangata Whenua in a Kaitiaki role is important with decisions that are backed by science, knowledge and practical experience.</p> <p>Support and funding for efforts to improve freshwater: This is a positive for everyone; supporting locals in terms of jobs, farmers with offsetting costs, conservation and ecological efforts, Hapu and Iwi benefit and Nature benefits.</p> <p>Something else: The Hikurangi Pump Scheme needs addressing with the community – it is a scheme which is paid for in part by the residential community, but there appears to be a lack of residential community representation. Plans and decisions need to be inclusive, and the scheme definitely should NOT be allowed to be controlled by farmers or those that seek to benefit the most.</p>
Alex Harvey	4 & 6	We already have a Farm Environment Plan through Fonterra. This has helped highlight areas on farm that are risk points for sediment and nutrient loss, and we have adapted our management practices to mitigate.

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		<p>We have a covered feed pad and feed all silages and feeds on. This works on a range of levels, reducing the amount of effluent we have to deal with, through to improved animal welfare with shading and shelter. We have also increased the amount of effluent storage we have on farm.</p> <p>These two points combined, should result in much better water quality outcomes than the farm was achieving 20 years ago.</p> <p>Everyone needs to be treated fairly, primarily forestry and their impacts on water quality. For example, the sediment loss from forestry has impacted one of the neighbours to the point their pumps downstream of forestry are lucky to last a year whereas they were lasting 5+ years prior to forestry harvest operations.</p> <p>Riparian plantings are an issue on our peat flats as the paddocks need to drain naturally. Closing off these areas too much will create more of an environment for more noxious weeds to thrive. This in turn would mean more need for herbicide use to keep water ways functional.</p> <p>With the amount of fencing already on farm around drains, changes to setbacks would be a major cost in terms of refencing but also loss of productive farm land. With 10 metre setbacks, there would be less than half of the existing land area available for grazing. How would this loss be compensated for?</p> <p>From what we see on our farm, the run off from forestry next door would suggest that it's not necessarily the best solution for controlling erodible land.</p> <p>We have a big concern about layering more and more costs on us through council and government regulation particularly. With volatility on the dairy payout, this risks putting us into the red. We can't be green if we're in the red!</p>
Ruben Hayes	2 - 10	Should not need consent to discharge to land! 25% for hill country is unmanageable. Stock exclusion from waterways should not encroach so much , over 3m is just land theft. basically; we pay dearly for land to produce on so don't make ridiculous rules that make farming more difficult than it is!
Gary Hayman		<p>I asked questions in your online Hui, sent a comment that wasn't addressed in the Hui due to time, but the online response was just a thanks for your comment. Very poor, no attempt to explore further options that are outside your limited scope or view point.</p> <p>I even put in my phone number just in case someone might have been even slightly interested.</p> <p>This - !!</p> <p>Question 12: Increasing water infiltration in the farm land can reduce runoff into waterways - 1% increase in soil carbon can infiltrate an extra 230,000 litres of water per hectare.</p> <p>Regenerative farming can increase soil carbon, using dung beetles can help with carbon soil increase as well as reducing dung pollution.</p> <p>Reduced fertiliser application, managed grazing processes where stock graze in a concentrated area that is then allowed to fully recover will increase soil carbon.</p> <p>Vertical river banks increase silt content of rivers - better shaped river banks and active grazing allowing recovery will decrease silt pollution.</p> <p>Holistic Planned management does all of this.</p> <p>I have two rivers through my farm, Tirohanga and Kawakawa, these flood my land during high rain events, so fencing waterways becomes unproductive due to flood damage.</p> <p>Come see what we can do with this farming process.</p> <p>Thank you for this feedback.</p>
Greg Hayman	6 & 7	<p>We are approaching this from the wrong angle. We should be looking at how we can manage the land and livestock to improve water infiltration and reduce runoff from the land.</p> <p>I use animals to increase soil carbon levels, increases water infiltration and keep's plants active for nutrient absorption.</p> <p>Please check out:</p> <p>Allan Savory TED talk  <a href="https://youtu.be/vpTHi7O66pI">https://youtu.be/vpTHi7O66pI</a></p>

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		Waterways Management <a href="https://onpasture.com/2018/04/23/grazing-around-streams-more-ways-to-do-the-right-thing/">https://onpasture.com/2018/04/23/grazing-around-streams-more-ways-to-do-the-right-thing/</a> I have an open farm policy, come and see what we are doing.
Louise Hayne	1 – 7, 9 & 10	I am strongly in support of the changes to all of the items above that I have ticked. The sooner these changes are introduced and enforced, the better.
KM Henare	1 - 12	<p>Tai Tokerau Maori Committees TTDMC, NZMC 2024</p> <p>Northland Regional Council must recognise Maori Committee (Maori Development Act 1962) – race should not be conflated with community. Te Taitokerau Maori And Council (TTMAC) working party doesn't have hapu representation – only limited to a select few. TTMAC meeting on 28 March has future review of TTMAC on the agenda for discussion.</p> <p>Concerns re central government policies directing monetary gain for land loss.</p> <p>Government has signalled it will amend the RMA and National Policy Statement Freshwater Management (process estimated to take 18-24 months) so council has decided to postpone notifying its proposed freshwater plan change until after the legislation is changed (ie not before 2026 at the earliest).</p> <p>Feedback on the draft freshwater plan change will determine where council prioritizes staff and resources over the next couple of years – so incredibly important to provide feedback to council – deadline 31 March. Te Kahu o Taonui and Tangata Whenua Water Advisory Group have developed templates to help hapu and maori landowners provide feedback.</p> <p>Te Tai Tokerau District Maori Council is a body corporate under the auspice of the Maori Community Development Act 1962. The 2024 Triennial Elections have just finished and the Te Tai Tokerau District Council has yet to be formed. The next step is the New Zealand Maori Council forms in April 2024.</p> <p>There are 14 Tribal Executives and 88 Maori committees In Te Tai Tokerau constituency namely : Te Aupouri 5 Maori committees areas, Te Rarawa 4 Maori committees areas, Ngati Kahu 12 Maori committee areas, West Hokianga 7 Maori committee areas, North Hokianga 4 Maori committee areas, South Hokianga 5 Maori committee areas, Whangaroa 8 Maori committee areas, Eastern Kaikohe 7 Maori committee areas, Western Kaikohe 6 Maori committee areas, Kawakawa 10 Maori committee areas, Whangarei 9 Maori committee areas, Mangakahia 3 Maori committee areas, Hobson 5 Maori committee areas, Otamatea 3 Maori committee areas.</p> <p>The Maori Committees that formed in the Te Tai Tokerau District Area for the 2024 Triennial Elections were:</p> <p>Here is the list of the maori committees in Tai Tokerau District Maori Council that advertised and formed during the 2024 NZMC Triennial Elections (17 February 2024 - 9 March 2024) under the Maori Community Development Act 1962:</p> <ol style="list-style-type: none"> <li>1. Taupo Maori Committee, Whangaroa - 18 February 2024</li> <li>2. Whangarei Maori Committee, Whangarei - 20 February 2024, 11am</li> <li>3. Ngararatunua Kamo Maori Committee, Whangarei - 20 February 2024, 9am</li> <li>4. Whakapara Puhipuhi Waitutu Maori Committee, Whangarei - 20 February 2024, 10am</li> <li>5. Whananaki Maori Committee, Whangarei - 20 February 2024, 12.00noon</li> <li>6. Matapouri Maori Committee, Whangarei - 20 February 2024, 1pm</li> <li>7. Ngunguru Maori Committee, Whangarei - 20 February 2024, 2pm</li> <li>8. Takahiwai Maori Committee, Whangarei - 20 February 2024, 3pm</li> <li>9. Waitangi Maori Committee, East Kaikohe - 22 February 2024</li> <li>10. Rawhiti ki Rakaumangamanga Maori Committee, Kawakawa - 22 February 2024, 3pm</li> <li>11. Whaka-Hika Maori Committee, Hikurangi Maori Wardens, Whangarei - 24 February 2024</li> <li>12. Omapere Opononi Waimamaku Maori Committee, South Hokianga - 24 February 2024</li> <li>13. Whakarapa ki Te Hauauru (River), Northern Hokianga - 24 February 2024</li> </ol>

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		14. Naumai Maori Committee, Hobson - 24 February 2024 15. Pouto Maori Committee, Hobson - 24 February 2024 16. Whangarei Maori Wardens Maori Committee, Whangarei - 24 February 2024 or 4 March 2024? 17. Mahurangi Maori Committee, Hobson - 24 February 2024 18. Ahipara Maori Committee, Te Rarawa - 24 February 2024 19. Tautehihi Marae Committee, West Hokianga - 4 March 2024 20. Akerama Ruapekapeka Maori Committee, Kawakawa - 8 March 2024 21. Pupuke Maori Committee, Whangaroa - 9 March 2024 22. Pakotai Parakao Maori Committee - Mangakahia - 9 March 2024 23. Pukepoto Maori Committee, Te Rarawa - 9 March 2024 24. Waitangi Maori Komiti - 9 March 2024 25. Pouerua ki Rakaumangamanga Maori Committee - 24 February 2024 26. Maori Womens Welfare League - Maori Associate 27. Maori Wardens Association - Maori Associate
Kristi Henare	1 - 12	Concerned about the lines of consultation with Hapu/Iwi. Iwi Chairs and PSGE do not have the authority or mandate to talk on behalf or for Ngapuhi Hapu and community.
Sonny Henare		As a member of the public and a Te Tai Tokerau resident, I am greatly concerned about the poor health of freshwater and the urgent need for us all to treat wai with more respect. I am seeking your support and action to ensure that the proposed freshwater plan change and action plan, and the Long Term Plan, uphold Te Mana Me Te Mauri o Te Wai, as a matter of urgency and priority. It would also be good to see Northland Regional Council consider what it has proposed in the draft plan change and action plan along with other ways that things can get done because, delivery by NRC is not the only way, nor the most effective and efficient. The things that are important to me are listed below. <ol style="list-style-type: none"> <li>1. Te Mana Me Te Mauri o Te Wai is fundamental and central to improving water quality in Te Tai Tokerau – we all need healthy water for healthy lives and livelihoods.</li> <li>2. Supporting tangata whenua and communities to undertake actions on the ground – NRC's focus has to be on enabling community-based action that results in long-term environmental gains and promotes sustainable livelihoods.</li> <li>3. Tangata whenua have been managing their wai and whenua, based on tikanga, kawa and mātauranga – NRC should be supporting kaitiaki and not standing in the way of rangatiratanga.</li> <li>4. We need to change how we think about and treat our wai – we must listen to our awa, repo and roto. Improving the mauri (life force) of wai is a prerequisite to sustainable livelihoods in Te Tai Tokerau. How we use our lands and forests needs to change and NRC's role is to support and enable landowners to use their lands in ways that result in improvements to freshwater first and foremost. I support giving greater respect to wai as a living entity with a right to be healthy and thrive (legal personhood).</li> <li>5. It is not sustainable to continue enabling land uses that result in declining freshwater health. Flexible and adaptable approaches are needed that support and encourage communities to work together at local levels. Setbacks and stock exclusion policies and rules should come along with NRC support to landowners to sustain alternative livelihoods from riparian margins and highly erodible land which results in environmental improvement and enhancement as quickly as possible. Incentives could be negotiated with financing institutions for loans to support fencing wider setbacks and permanent native reforestation and wetland and riparian restoration. Council should not only consider the economic costs to landowners when considering the actions proposed but also the gains and benefits from improved freshwater health to all.</li> <li>6. NRC budget allocation must consider how service delivery (such as resource consents and environmental monitoring) might be more effectively and efficiently delivered and not assume that</li> </ol>

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		<p>it is the council who should be making decisions and managing freshwater. This means also committing to and following through on transferring powers and functions to māori, entering into (and implementing) relationship agreements and contracting tangata whenua direct involvement in freshwater management to name some examples.</p> <p>7. The freshwater plan change and action plan needs to focus on the freshwater needs of our children and grandchildren and not the short-term economic gain of a few. With this in mind, I would like to see climate change, Te Mana Me Te Mauri o Te Wai, empowering our local communities to improve freshwater health and ecosystems at the top of the list for priority action. Ensuring that the health and well-being of wai are put first and foremost in all NRC's planning and decision-making on freshwater is critical to our ability to sustain livelihoods. Further work on future water demand in light of up-to-date climate science is needed, including consideration of relocation of settlements, kāinga and marae and their future water needs, as well as population growth and migration.</p> <p>8. It is important to me that spending is aligned with Climate Action and proper consideration of ways in which water wastage can be reduced, alternatives that will reduce demand for freshwater takes (e.g. desalination or cropping choices) and more equitable allocation approaches to the existing 'first come first served' approach must be explored and implemented. I support the proposed targeted water allocation policy which would set aside 20% of any allocation for particular uses such as marae, papakāinga, māori land use, and environmental enhancement. Associated funds generated by applications for other uses should be used to support community-based and hapū led freshwater improvement activities in Te Taitokerau.</p> <p>9. It is also important to me to be able to be part of wider NRC decision-making, beyond providing feedback on the draft freshwater plan change and I request that you keep me updated on what NRC is proposing in relation to freshwater, Te Tiriti, climate change and budget and LTP decisions.</p> <p>10. Mana whenua must be involved in any further development of this freshwater plan change and action plan and the Long Term Plan must include sufficient budget for input from tangata whenua from development through to implementation. The focus must be on supporting whanau, hapu and iwi action on the ground working at the community level to improve freshwater in Te Tai Tokerau.</p> <p>11. The council needs to demonstrate it is taking its Te Tiriti partnership roles and responsibilities seriously and recognise He Whakaputanga and the findings of the Waitangi Tribunal relating to freshwater.</p>
Courtney Henderson	1 - 12	<p>As a māori landowner (Maori Reservation and Blocks) and as a member of the Ngararatuna Maori Committee would like to show that we are māori and community of interest for all areas of significant in our defined area under the Maori Community Development Act 1962.</p> <p>1. We would like to commend NRC on reaching this draft stage of plan development. The framework you have developed provides a solid base for amendment to effectively address water quality issues we have in Te Tai Tokerau, not just to give effect to the NPS-FM (2020) and Te Mana o te Wai. This plan change represents an aspiration to ensure our tamariki, mokopuna, and future generations can swim in our rives and access safe drinking water, while providing for themselves and any options for how they live with our rivers, lakes, wetlands, and land in the future. This plan change is important to our māori and community because what you do to the land, and what you do to the water, you do to our people.</p> <p>2. We generally supportive of the draft plan change, particularly the incorporation of objectives and policies relating to Te Mana o te Wai (such as Objective 3.16 Te Mana me te Mauri o te Wai). I strongly support the retention of Te Mana o te Wai in the plan.</p> <p>3. Our primary interest in freshwater in Northland is as tangata mana whenua, kaitiaki, fisher, swimmer, and we value the health of our rivers and streams, groundwater, and wetlands and the life-supporting services they provide, as well as their overriding cultural value, and our tino rangatiratanga over our Wai Maori - our water - which is protected as taonga and enshrined by the terms of Te Tiriti o Waitangi. We also value the coastal areas where these waterways flow to, which are obvious 'receiving environments' for water from upstream in the catchment.</p> <p>Ngararatunua Kamo Maori Committee protects Lake Ora Natural Springs in Te Kamo. We also want to protect all wai flowing through all the waterways that our tupuna protected for generations before us.</p> <p>4. The water bodies and coastal environments that we interact most with and am most concerned</p>

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		<p>with: (a) The River and all its tributaries; (b) All of the puna and awa - springs and streams, (c) All of the lakes (d) All of the rivers (e) All of the wetlands, (f) All of the springs and aquifers, (g) All of the estuaries (h) All of the beds and the banks of the rivers, lakes, streams, wetlands, and estuaries</p> <p>5. Primarily we value the water quality values of these areas for protecting the safety of our drinking water, as our tupuna did. Also vitally important in ensuring the safety of our kai, and the environment where we enjoy contact recreation such as swimming and diving (and ecosystem health by association – as healthy ecosystems support better water quality for contact, such as by limiting algal growth and particularly toxic algal growth.</p> <p>6. The natural and wildlife values of these areas are also important to me because this is where our people commune with our environment, and this is every bit as much of a “holy” communion as the colonial practises of “holy communion” - these places are our ‘holy’ places. The birds, the fish, the eels, the insects, the trees and plants, all have deep intrinsic value to us and all of them are sustained on a fundamental level by water, and vitally reliant on the quality of that water to sustain life.</p> <p>7. We would like Northland Regional Council to do as much as it can to protect and restore te Mana o te Wai and to achieve and maintain optimum ecosystem health in these areas, and across the region generally.</p> <p>Key Issues:</p> <p>8. Key issues for us across Northland include water quality (particularly e. coli, sediment, algal growth/periphyton, potential toxic waste from mining activities, and ecosystem health); amenity values/drinking water; contact recreation; and natural form and character. We see sediment flowing into our waterways uncontrolled and unmitigated by local bodies, we experience flooding frequently, and damage to roads and other infrastructure caused by run off and flooding. We frequently experience toxic algal blooms in our rohe (area) that poison our kai and our wai Maori - drinking water - and prevent us from practising our traditional cultural activities - swimming, diving, and travelling on rivers and waterways. We now have caulerpa in our inshore waters, and a number of invasive foreign species that have made their way past our border controls and governance and management bodies.</p> <p>9. I support having strong regulatory measures in the plan to address these issues.</p> <p>10. To address freshwater issues, I would like to see Northland Regional Council:</p> <p>a. Protect and provide for ecosystem health by</p> <p>i. Including clear target attribute states for nitrogen and phosphorus, and any heavy metals that might be part of toxic waste from mining proposals, that protect ecosystem health (not just ‘toxicity’); and connecting these to limits on resource use. It appears these are missing from the draft plan and this gap needs to be addressed.</p> <p>ii. Providing for Te Mana o te Wai throughout the plan.</p> <p>b. Protecting the health of groundwater for human drinking and ecosystem health by: i. Including a target attribute state for nitrate-nitrogen in groundwater with a target of less than 1.0 mg/L nitrate-nitrogen.</p> <p>c. Protecting erosion prone land through:</p> <p>i. new rules limiting vegetation clearance, land preparation and earthworks in areas of high erosion risk, with tighter controls applied to these activities in areas with severe erosion risk.</p> <p>ii. new rules requiring stock to be excluded from areas of both high and severe erosion risk.</p> <p>d. Keeping stock out of waterways with</p> <p>i. rules for streams in steeper areas,</p> <p>ii. large enough setbacks (&gt;10m) to provide enough space for riparian vegetation to establish around waterways, to allow rivers and streams to naturally adjust through erosion over time, and to provide space for rivers to dissipate flood energy without eroding fences or causing problems downstream</p> <p>e. Eliminating and reducing discharges by:</p> <p>i. Requiring consent for dairy effluent discharges to land</p> <p>ii. Prohibiting new farm dairy effluent discharge to water and introducing stricter requirements for renewal of existing consents.</p> <p>iii. Prohibiting new wastewater treatment plant discharges to water and introducing stricter requirements for renewal of existing consents.</p> <p>iv. Prohibiting domestic wastewater discharges to waterways</p> <p>v. Prohibiting any toxic waste from mining activities into waterways above and below ground</p> <p>f. Protecting wetlands by</p>

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		<p>i. Prohibiting wetland drainage and clearance</p> <p>ii. Requiring stock exclusion from wetlands</p> <p>iii. Adding policies to the plan that would encourage wetland restoration</p> <p>iv. Mapping and monitoring wetland extent</p> <p>v. Introducing a measure of wetland condition using a tool like the wetland condition index (as recommended by the Government's Science and Technical Advisory Group on the NPS-FM)</p> <p>g. Controlling exotic forestry by:</p> <p>i. Requiring larger setbacks for exotic carbon and plantation forestry from waterways. ii. Requiring resource consent for plantation forestry and exotic carbon forests in high-value dune lake catchments.</p> <p>iii. Prohibiting clear-felling of forestry in high-risk or steep areas</p> <p>h. Expanding requirements for assessing impacts on cultural values by</p> <p>i. Adding requirements for resource consent applicants to assess cultural impacts that affect tāngata whenua values for freshwater.</p> <p>i. Phasing out and preventing over-allocation of water by</p> <p>i. Using short-term consents of &lt; 10 years for all water takes, unless for municipal/papakainga/marae supply</p> <p>ii. Prohibiting water takes above environmental flows and levels</p> <p>iii. Ensuring consent expiration dates are aligned across a catchment</p> <p>iv. Setting aside a portion of unallocated water (provided it is within environmental limits) to be used for environmental enhancement.</p> <p>j. Addressing nutrient pollution from agriculture by</p> <p>i. Having a robust allocation system for nutrient leaching, which should include things like limits on fertiliser use and stocking rates in degraded catchments.</p> <p>k. Promoting nature-based solutions by</p> <p>i. Including policy prioritises nature-based solutions over engineered solutions when making decisions on flood protection.</p> <p>ii. Including policy protecting the ability of existing wetlands, native forests, and rivers/floodplains to naturally mitigate extreme weather</p> <p>l. Improving the management of the natural character and habitat of our rivers by</p> <p>i. Increasing the regulation of activities in the beds of rivers, such as gravel extraction</p> <p>ii. Requiring regular monitoring and reporting of natural character and physical habitat in rivers</p> <p>iii. Including target attribute states for natural character and physical habitat in rivers m.</p> <p>Protecting coastal water and water in 'receiving environments' by:</p> <p>i. Protecting and restoring catchments upstream to improve water quality</p> <p>ii. Including target attributes for water quality in estuaries and coastal areas</p> <p>iii. Responding promptly and effectively to reports of pollution, contamination, invasive species, etc.</p> <p>iv. Ensuring that water in our waterways is maintained at a drinkable standard, and publishing full results of monthly testing on NRC website</p> <p>n. Honour Te Tiriti o Waitangi by:</p> <p>i. Consulting fully with the local hapu and Maori Associations, including primarily the Ngarararuna Kamo Maori Committee regarding all issues that affect our rohe - our area of jurisdiction, and our catchment area.</p> <p>ii. Establish and support systems based on tino rangatiratanga Maori, and work with and collaborate with Ngararatuna Kamo Maori Committee to enact and implement these systems.</p> <p>Thank you for the opportunity to make this submission. We look forward to the progression of the plan to notification and the improvements in water quality it can bring when implemented.</p>
Esther Herbert	1 – 4, 6 – 8 & 11	<p>1 . Protecting Erosion-prone Land:</p> <p>While I agree erosion prone land should be protected the slope percentage is too low. &gt;50 degrees is a much more realistic target for High erosion and &gt;65 degrees for Severe erosion. 25-40 degrees is easily tractored and good productive farm land. We are already loosing too much land to forestry and with an ever increasing worldwide population we need to retain enough land for food production. Maybe you should be limiting forestry to over 50 degrees.</p> <p>2. Excluding Stock from Waterways</p> <p>Yes, I agree that all stock should be excluded from waterways. At least 3 metres for continuous running</p>

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		waterways and 1 metre for drains etc that dry up. Stock should also be excluded from dams, lakes, all-year wetlands etc that ultimately could overflow into waterways. Again 1 metre should be enough for these areas. This should be a 10 year phase-in plan with continuously running waterways being first priority, because the cost will be very significant for land-owners. There should be subsidies from Council and Government to help with this as it is not just a benefit for land-owners but for all New Zealanders.
Phil & Anne Herbert		<p><b>Question 1: Stock Setbacks in metres?</b></p> <p>We would suggest the current requirement for 3 metres fence setback stays provided that the water passes through a settling area for sediment followed by a wetland. This could be combined with an existing water supply dam.</p> <p>The same setback could apply for E-coli. However this may not be necessary for E-coli as at present a number of farmers including ourselves have introduced Dung Beetles in the last few years and as their numbers increase the E-coli will gradually disappear. The Dung Beetle site on the internet estimates a time of about fifty years to complete removal (this may be the Dung Beetle multiplication time to get full coverage).</p> <p>It may be worth your while subsidising the cost of the beetles to help expansion of the beetles along.</p> <p>The other categories on your chart could stay at a 3 metre setback reducing any wrangles over distance.</p> <p>Where existing fences do not meet these standards they may remain at the original spacing.</p> <p><b>Question 2: Stock exclusion on highly erodible land?</b></p> <p>We think this would be for the best but should only take place over a reasonable time. This time should be decided by the farmer according to his financial position at that time.</p> <p><b>Questions 3 and 4: Rules for excluding stock from wetlands?</b></p> <p>We agree with what you are proposing. However this may be problematic with wild animals such as pigs.</p> <p><b>Question 5: What timelines are feasible?</b></p> <p>We think the timeline for all the above rules should be in the area of five to ten years at least depending on the farmer's financial position. We also do not think the job can be done hurriedly as it takes time to consider the options available.</p>
Frank Hewbert	1, 2, 4 – 7 & 10	<p>The planting expense NRC are imposing puts a huge prohibitive expense on amateur farmers, Making farming a corporate only business to be dominated by foreign investors like forestry with the uncontrollable swarf problem.</p> <p>Native Plants will regenerate and grow in areas fenced off there is no need to plant.</p> <p>We already have a huge waste of land caused by ineffective Carbon sinks being planted and solar farms using flat productive farmland near cities.</p> <p>I am totally opposed to any racist farming rules or racist groups controlling farming. Especially racist groups who wiped out the moa and Haast eagle. No i don't want to attend a hui and be confronted by hostile people with chin tattoos</p>
Sarah Hewlett	6 - 8	<p>I'd like to make a couple of comments on your draft Freshwater Plan Change. For a start, at first glance, the satellite generated map looks like a complete nightmare and is quite frankly, debilitating – which may or may not be the objective. When my 12 year old son saw it, he commented... "A billion tiny fences". Sounds like fun. You must realise that the picture on the paper is an entirely different scenario from the grass roots perspective and will be difficult to achieve from a practical point of view, never mind the cost. You will need to consider how the regulations will be implemented in situations where it is not straight forward. We experienced a lack of practical knowledge when fencing the harbour side - one Council employee couldn't give any advice on a practical level with regard to fencing a specific difficult area.</p> <p>We're a family of farmers. We've been on the farm for 150 years. We are all for regenerating the environment (more in the true sense of the word) and have been trying to plant native trees, spreading only natural minerals as fertiliser, trapping, all the usual activities. However for a farm our size (230 ha)</p>

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		<p>the combination of fencing off all intermittent waterways (which we call gullies) and steeper (erosion prone) land would, because of the economics, probably mean the end of our traditional farming model – which I presume is what is preferable to most. The policy makers might just want to check how much energy is required to produce alternative forms of ‘protein’, which may be called food at a stretch, and how ‘green’ they really are. The ‘science’, which is rather a watery word these days, is dubious, as our ecosystem is so intricate. This blanket regime seems a little like fools rushing in...will we destroy some of our positives whilst trying to address the negatives?</p> <p>Maybe the satellite map requires a second level of analysis. There are many relatively small areas of land which will be required be fenced for the purposes of stock exclusion – Should the land be a certain hectareage before it is required to be fenced off, and what should this be? Perhaps, since your economic analysis would lead the farmer to believe that the most economically viable alternative use for erosion prone land is radiata pine, it should be at least a minimum of 1 or 2 hectares, to match with the Emissions Trading Scheme.</p> <p>The hypocrisy of this economic analysis is probably the most annoying for me. The Regional Council’s proposed regulations are all about water quality, all about concern for the environment, the ecology. I do realise that directives come from central government and sometimes international organisations, however the result of the economic analysis clearly encourages covering even more of our landscapes with “short lived, shallow rooting, highly flammable monocultures...” in the words of Anne Salmond. That’s not concern for the environment. One author suggests putting a levy on new non-native conifer plantations. Will this happen and how much will it be? For how long will this whole pine tree thing be acceptable?</p> <p>A guy called Simon Lewis summarises it quite well. “There is a scandal here. To most people forest restoration means bringing back natural forests, but policy makers are calling vast monoculture forest restoration. And worse, the advertised climate benefits are absent.”</p> <p>If the Council is going to disrupt farming to this degree as champions for the environment, you may as well go the whole way and require native plantings rather than hypocritically advocating pine plantations, in the long run, we may find that pine trees are worse than stock.</p> <p>In addition, we’ll conveniently forget that the large quantities of posts required will be treated with copper, chromium and arsenic– or will be the micro plastic shedding alternative, and we won’t think about the lashings of glyphosate that will probably be used to keep weeds away – and that these chemicals will probably make their way into the waterways, oh well. I suppose the ‘science’ says that’ll be ok.</p> <p>As I mentioned, we don’t mind planting native trees, and if we must fence off our gullies, the time frames would need to be lengthened for it to be affordable for us, as we’d be making sheep fences.</p> <p>One more thing that concerns me about fencing off waterways and erosion prone land, is that for the past decades, farmers have been encouraged to plant these areas with species such as poplars, willows and flame (coral) trees – which are now considered a weed – hmmm... the stupidity of following the advice of local authorities! Anyway, we have become accustomed to these trees doubling as a source of shelter for our animals, especially as shade during the summer. We mustn’t be the only ones in this position. Animal welfare groups are continually concerned about animals not having adequate shelter. We will need to be given plenty of time for alternative adequate shelter to become established. In some cases, my father left a strip of gorse and privet around certain gullies to stabilise edges, which seemed to work. Stock don’t often push through gorse, only in bad storms when it provides an excellent form of shelter. Of course this concern will not be of any consequence if deletion of sheep and beef from the land is the ultimate goal.</p> <p>Perhaps extensions could be granted if fencing work is taking longer or if a particular farm has a high number of gullies or erosion prone areas. Will you explore soil types – also a factor in erosion, or is the indicator purely gradient? When such a large area is concerned, would it be better to start your experiment with the areas with a slope of more than 35 degrees, instead of jumping into a project which will affect such a substantial amount of land?</p>

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Megan Hickman	1 - 12	<p>At best these draft rule changes and be described as quixotic, improving the quality of our fresh water is a nice ideal, but these rule changes are ridiculous &amp; unfairly target rural landowners with no thought to the financial burden or consequences for our rural people.</p> <p>Erodible land should be determined on a case by case basis, based on a consultation &amp; visit with the landowner. A broad brush assumption that all land of a certain type &amp; incline is HEL is not realistic, &amp; cannot be ascertained from a map by someone sitting at a desk. Most of the sediment ending up in our streams comes from unsealed roads, arable land used for cropping &amp; over grazing whether that be on hill country or on the flats.</p> <p>Stock exclusion from steeper grades of land, based on the broad brush approach suggested in these plan changes, is egregious &amp; should not even be considered as a viable option.</p> <p>Fencing of our waterways is a nice idea, but it must be incentivised &amp; it must be undertaken over a longer realistic term. Council had a fund for waterway fencing that landowners could apply for, but this has been stopped, which is short-sighted. Any project funding from council should be targeted toward all ratepayers, &amp; not targeted to specific groups/communities or any non-rate payers.</p> <p>Distance of any fencing from a waterway should be site led as it will vary from place to place. Whether it is planted or not should be decided by the landowner, as this again will be site led.</p> <p>As a landowner, I have paid money for my land &amp; continue to pay taxes on my land. I do not believe that I should be required to have any cultural impact assessments for resource consents on that land. I think tangata whenua cannot have 3rd party control over my land, I have my own cultural values that are just as valid.</p> <p>Anyone of any community, culture or creed is able to participate in freshwater management, leadership &amp; decision making. However, as a landowner I have property rights &amp; I think council is over reaching. It cannot seek to impose the beliefs of another culture onto me &amp; my property.</p> <p>Everyone should be able to have an equal say in the planning I do not believe tangata whenua have a stronger relationship with the land, waterways &amp; the environment in general by virtue of their ethnicity, than anyone else.</p> <p>The majority of current landowners were not responsible for clearing the forest.</p>
Bill Hilliam	2 & 7	<p>Concerned the proposed rules around 25 degree and above slope. This would have a considerable impact on the operation of our farm. 50% of the dairy platform would be adversely affected by this rule. We have completed a Fonterra Farm Environment Plan, which has provided us with a framework to reduce the risks of erosion from slopes. We have applied for and started works under the KMR to fence off water courses on these areas. We believe this farm plan approach is a much better way of achieving these water quality targets.</p>
Paul Hines	2	<p>The team have not identified the Severe Erosion area associated with the beach front area of the Blacksmith Creek Nature reserve at Marsden Bay, One Tree Point. The beachfront has receded by some 50m in places and the protecting sand bar has disappeared. The beach front bank will be breached in the near future and thus the whole reserve will become subject to rapid and irreversible degradation.</p> <p>Not only is the reserve in danger the beachfront properties and associated esplanade of Marsden Ba will be severely damaged. This needs to be addressed ASAP.</p> <p>I would suggest a programmed use of the upcoming harbour dredging program may hold a solution in regards to the placement of the dredged material as a replacement for that which is lost. As this degradation is an associated consequence of the long term effects from the port development and the Marsden cove marina canal entrance channel. Both of which have had a detrimental effect on the natural sand migrations.</p>
Hokianga Harbor Care Incorporated (Oliver Knox)	1, 2, 4 – 8, 10 & 11	<p>Hokianga Harbor Care Incorporated is a charitable trust established in 2018 also know as Tiaki Nga Wai O Hokianga. We are currently funded by Ministry for the Environment Jobs For Nature (and other co-funders) to deliver freshwater improvement projects across the south Hokianga, growing native plants, fencing and planting waterways, managing weeds and building capability within the community. With our current 5 year project coming to an end in July 2025 we have been focussed on this kaupapa</p>

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		<p>throughout and it is abundantly clear that there is a need for improved freshwater management, and we fully support that the plan needs major changes.</p> <p>We feel that to achieve this there needs to be a focus on capability building and funding to assist landowners get access to expert advice and resources. With a timeframe of 10 years to implement changes, there may be a serious capacity gap that needs filling.</p> <p>The mapping is a great tool and provides a fine level of detail to work with, as there will be a need for detailed, well informed and site-specific planning to get the right outcome for landowners while not being overly stringent.</p> <p>Overall, we support the plan changes and are providing specific feedback on the following:</p> <p>Stock exclusions - Setbacks from waterways should be a 5m minimum and an averaging approach be used, as it is often more practical to build straighter sections of fence. A minimum of 5m would ensure that at least some of the benefits of investing in restoration planting, such as bank stabilisation, filtration and habitat creation, would be realised. A minimum of 3m, according to information supplied, falls short of many of the benefits, and in our first-hand experience in the field 3m is not enough. This rule should also apply to intermittently flowing streams as they often become continuously flowing during winter during the highest chance of sediment entering the stream.</p> <p>Highly erodible land - We support the plan change to exclude stock from highly erodible land with severe erosion risk as the evidence is clear that this would greatly reduce sediment runoff and, along with revegetation, significantly improve freshwater quality.</p> <p>Exclusions from areas with severe erosion risk should also apply to sheep and goats.</p> <p>For areas with the lesser high erosion risk we also support some type of exclusions but these should take into account local conditions and geology, the type of stock and stocking rate, and the overall impact on the farming operation. The rules need to be applied in a practical and fair manner as we are concerned that the costs on landowners for stock exclusions on highly erodible land, particularly in poorer areas, will be a great burden. Furthermore, in retiring highly erodible land and implementing reforestation we would hope that NRC will encourage planting natives instead of exotics and provide advice to landowners regarding ETS and options for native reforestation carbon credits.</p> <p>Wetlands - Stock exclusion for cattle, dairy and deer from wetlands should apply to all types of land including hill country, but a phased and fair approach needs to be used. Riparian setbacks don't need to be applied to wetlands.</p> <p>Controls on exotic forests - There need to be larger setbacks from waterways and wetlands for exotic carbon and plantation forestry and these should be a minimum of 20m for all waterways and wetlands of any size. The potential devastation of mobilised slash and forestry debris is a very real threat and should be mitigated as much as possible.</p> <p>Impacts on cultural values - There should be requirements for resource consent applicants to assess cultural impacts that affect tāngata whenua values for freshwater and for the wider community these values underpin their identity and connection. We need to empower tangata whenua and provide access to tools and resources for them to exercise their kaitiakitanga.</p> <p>Other - Not addressed within the draft plan are the impacts of pest plants, particularly following exclusion, or land clearance using heavy machinery as a vector for spread. As grazing pressure is relieved, areas of pasture could quickly become dominated by pest plants, especially when there is a large seed source close by, and this could be a major problem in the future as areas are left to be retired. Furthermore, it is noticeable how freshwater ecosystems are being impacted by pest plants as they dominate and influence local systems, changing the flow of water, causing in stream blockages, and changing the habitat of our native species.</p>
Tracey Holden	3, 6, 9 & 10	<p>It is my opinion that water belongs to all New Zealanders and that it is the responsibility of all New Zealanders to manage this resource, the NRC draft fresh water plan comes at an extreme cost to one particular group of people, farmers/land owners, these people are mostly dedicated to making changes in their own right and without enforcement from the council and most of them welcome the 3m rule set out by the Government despite the additional cost this brings to these individuals, but, to extend this to a greater distance such as the 10m that has been suggested creates an area of land that is unusable and can become unmanageable and full of vegetation that may clog the very waterways that</p>

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		<p>we are trying to ensure stay fresh and clear. There will also be places where this is totally impractical to do due to the fall of the land and the waterway itself.</p> <p>What about the small lifestyle blocks that may well have a stream running through the land, to expect them to be able to lose 10m either side of that stream is totally impractical and devalues the property they own, these people are unlikely to be able to afford the cost of implementing this rule and most of them only have a few stock to keep the grass down so how will your draft plan affect them.</p> <p>I am not comfortable with the management of allocation of water being given to any one party, surely it should be available to all who need it and if this needs managing it should be done so by the council as representatives of all the people not just a selected few, we absolutely need to have water available for environmental enhancement but if it is going to be kept available for cultural enhancement then it should be for all cultures that reside within the city limits represented by NRC.</p> <p>This draft plan is likely to remove hundreds of millions of dollars from the Northland economy an economy that is barely afloat at the moment and one that is seeing most of your ratepayers struggling to make ends meet, would it not be advisable to accept the NPS baselines for the restrictive and costly part of the plan and look at ways to enhance the area surrounding waterways with plants that help filter run off and restrict stock access thus eliminating the cost of fencing and losing land. I understand we had a lot of slips during Cyclone Gabrielle and there was a huge amount of run off all over the country that had nothing to do with stock and still ended up in waterways along with extreme amounts of debris. There is much we can do around our waterways to enhance and maintain them but your draft plan is not the way forward as it concentrates on one area and puts a huge amount of pressure on this group of people both financially and mentally/emotionally.</p>
Brianna Holland	1, 3, 6, 8 & 11	<p>Because dairy farmers already have to have waterways fenced, I like the option of grandfathering in their current fences as acceptable until the point that they need to be redone. Then a greater setback can be required. It would be nice if there was more educational material around the setback requirements for property owners with animals that are not farmers. I believe that every landowner along every waterway needs to be part of the future plan especially if there are new council taxes for management and monitoring, they deserve a visit from NRC so they fully understand their responsibilities. Once the new plan is set it would be beneficial if its goals were something that everyone is working towards, as in small progress should be recognized towards the end goal. We have seen how natural weather events can ruin so much progress.</p> <p>I would like to see NRC &amp; Dairy NZ as well as other farming professionals come up with reasonable alternatives once there are no more consents to discharge. They can't just say NO more but not offer alternatives.</p> <p>If there was someone at council who worked with every landowner to identify the best locations for riparian planting that would be great. Maybe there were grants or free trees if you followed their planting suggestion. People will buy into plans if there is help achieving goals.</p>
Jeanaven Hotere	1 - 12	<p>As a rural resident, hapu, community member I think that this plan change is a good thing for the awa. This precious resource.</p> <p>It will affect many farmers, and landowners which I have taken into consideration, however this resource can't be compromised, and abused any longer if we don't take dramatic. Steps now their will be no wai in the future.</p> <p>People in rural communities just can survive without clean water.</p> <p>I want my whanau to be able to enjoy the things I enjoyed as a child, in one generation I have seen decline where I live now because of stock, and sediment and intensive land use activities</p> <p>Large dairy farmers have to step up to the plate and improve practices around the awa as this effects the entire community and we can't continue on this path or the resource will not recover.</p> <p>I think that the setback should be staggered to allow for the following</p> <p>If a farmer or landowner has already done the 3mtr fenced with planting. They should be allowed the following. 5 years to comply with a 5m setback And 10 yrs for 10m. They should be offered some funding support, to help off set this cost or some kind of relief if they are small business owners.</p> <p>Or landowners who don't have income</p>

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		<p>Landowners should also be offered support if they cannot afford to do the work. It is a national interest for the country. investment needs to happen from government to help landowners</p> <p>All landowners on catchments</p> <p>Then this will happen.</p> <p>The setback should be 5 to 10mtrs where practical.</p> <p>Catchments should be looked at top to bottom as priority.</p> <p>Farms and forestry also need to invest in these catchments as they are normally the biggest contributors to the problems.</p> <p>Dairy farms also need to be looked at from size, to determine impacts. If a dairy farm is non compliant they should be allowed time to become compliant. If they don't become compliant they should be fined.</p> <p>More investment needs to happen with local community to achieve these new setbacks this will create work in this sector also an build economy to get the work done over time.</p> <p>Large companies that use farms for products need to also contribute to catchment restoration if they are getting something from the land. E.g. dairy, forestry,</p>
Glen Houghton	6	<p>My main issue is around the water ways set back. Our farm already has lots of water ways fenced off, from 1 metre setbacks to about 8 meters in places. Most of these fences were in place when we bought the farm in 2022. One major issue is weed growth in the riparian zones. I have planted some spots and they have been smothered by weeds or wiped out by floods.</p> <p>Another major issue is fence damage and debris on fences every time we have even a minor flood. Fence debris cause the electric fences to short out and stop working.</p> <p>A further issue is some parts of the farm could be cut off or made impractical to farm if we are made to have large setbacks.</p> <p>I like clean water very much. Cheers</p>
Janelle Imeson	2, 3, 5, 7, 10 & 11	<p>The dairy farmers don't need a new plan for the waterways, the Farm Environment Plans which cover the issues you have. But yes, sheep and beef, life-stylers, and small blocks need to adhere to fencing off waterways, and not discharging to stream. Dairy farmers should not be charged for resource consents to discharge effluent to land, there are already rules we have to follow, and are charged for inspections, seems like revenue generating plans to me.</p> <p>The "highly erodible land" maps are very extreme, fencing these off will destroy the Northland farmers and in turn the Northland economy, get rid of those maps. Yes have guidelines, like don't put stock in your steep paddocks when there is a cyclone coming through etc. farmers don't want to ruin the land they own, they don't want it to wash to the bottom of the hill or into waterways, no more than anyone else, we are the kaitiaki of the land. There are real consequences for not leaving your whenua in a better state than you found it.</p> <p>Be sensible, don't double dip, start at one end of the wai and work your way down, use google maps, find out the worst areas, it's not a one size fits all. It's not the majority good people you need to target, its the minority of useless buggers.</p>
Les Jackson	2, 5 – 7 & 10	<p>Hello, after glancing through the proposed changes I have reached the conclusion that you are under the assumption that farming in Northland is profitable, let me assure you it is barely worth the effort. Especially after paying the exorbitant rates to both council's, To regulate to this extent is a joke as you do not own the land I do. The erodible land on our property has already been retired probably 30 years ago. This retired land makes up about two thirds of the farm and I do the best I can with the rest. If tangata whenua are asking for these rules I would expect they would lead the way by fencing off all streams and wetland that are on Maori land. With the number of owners involved in this land I wish you the best of luck with that. I would also expect that that my hard earned rates and taxes would not be paid out as grants for this work. One of the problems we have in Northland is not a problem with not enough water is that sometimes there is far too much, what I would expect the council to be involved with is infrastructure and flood management, so how about sticking to your knitting and will stick to mine. Regards Les.</p>

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Rosco Jackson	1 - 11	All I know is, we can't keep doing the same old thing. Stock need to be kept away, no excuses, same as using fertiliser close to water ways. Maori need more say and control of looking after our waterways
Murray Jagger	1 - 11	<p>Fresh water is the lifeblood of our farming and community environment and should be a key focus of a strong regional vision.</p> <p>My family settled this community in the mid 1800's and over time as settlers developed a vibrant coastal farming community. It would be fair to say that with all settlers clearing and development of land for productive purposes was both critical for survival and important for financial sustainability not only for the families involved but the communities that developed.</p> <p>I look at old photos of what was developed and then I look at today and see how far we have come in terms of good custodianship and protection of flora, fauna water and wetlands. The protection and long term sustainability is happening faster than ever before and will continue to improve without archaic rules and regulations that are being proposed by the new fresh water plans.</p> <p>You state that these new regulations will sit alongside other agencies doing similar work creating unnecessary duplication and cost where in fact the good work being done by organisations like Fonterra should be feeding into whatever documentation NRC requires.</p> <p>Our current framework is sufficient but needs resourcing better and should be community driven not legislated. Certainly laggards need to be brought in line but the current system is appropriate where non compliance is supported back to compliance.</p> <p>Farmer driven communities have used local and regional knowledge to develop systems appropriate for land and water preservation over time. The use of different grazing systems and class of livestock on different types of soil class and terrain has been very successful and should be supported instead of legislating. Whilst Northland has the greatest number of soil types in the country the research developed over generation needs to be used and educational systems need to be adopted more. Overall the general management of farming systems to suit farming types is working and enforcement of a regional council way of doing things will not work.</p> <p>Enabling tangata whanau to practice kaitiaki over water alone is divisive. This is all of our responsibility and an inclusive process would be far more powerful whereby we all understand the principals of Māori kaitiaki which I think you will find many non Māori are practicing now. The values need to be inclusive values and a far better engagement process needs to take place.</p> <p>I have touched on stocking pressure on steep and erodible soils which is already being managed. The use of soil management plans alongside our farm environment plans will help identify the risk areas and the management plans of classes of stock not an exclusion path you seem to be going down. This can again be done through existing processes and not legislation. Natural management common sense will exclude areas that need to be and a reduction in stock pressure and improved management practices adopted. This also applies to riparian setback.</p> <p>Whilst I agree with stock exclusion in waterways there has been huge amount of work has been done and continues to be done in this space in a voluntary and productive manner. Legislation does not need to occur as the momentum is gaining. Setbacks need to be practical and not mandated and certainly not more than 3 meters. The risk of being unable to clean drains and build-up of weeds will have long term consequential effects and a burdensome cost.</p> <p>If we look at rain events most contamination and silting comes from forestry and council roads especially councils that have a road edge spraying policy. This contamination which is outside of the farm gate will not change unless policy changes. More native planting needs to take place in areas that are currently planted in exotics and are harvested.</p> <p>Northland has a massive opportunity to contribute to the national economy and does not need bureaucratic and legislative rules and compliance which will diminish these opportunities.</p> <p>More support and funding opportunities along with community driven education programs will deliver the outcomes being sought over time.</p> <p>Do not reduce our available hill country land area-create opportunity for current plans and management to be shared. Do not increase riparian area setbacks - this reduces available productive land and increase the consequential risk of flooding and weeds.</p>

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		Do not hand over custodial rights to one ethnic group - encompass the whole community engagement on the same values of Māori.. Let's not over burden our communities with regulation when they are all doing great mahi already and make our region more prosperous not poorer. A balanced approach needs to be taken not extremism.
Roberta Jones	12	<p>(Climate Crisis, Wetlands)</p> <p>CLIMATE CRISIS- Actions- a process, not a one off.</p> <ol style="list-style-type: none"> <li>1. Green based solutions.</li> <li>2. Working with the community.</li> <li>3. Link weather events to climate change.</li> <li>4. Design goals of economics around Nature-based solutions.</li> <li>5. Set aside finances for climate events and Nature based solutions and adaptations.</li> <li>6. Companies and individuals held to account.</li> </ol> <p>WETLANDS</p> <ol style="list-style-type: none"> <li>1. Protect what we have- all remaining wetlands (no exceptions) on both public and private land. Private wetlands- compensate owners.</li> <li>2. Protect rivers, streams, lakes from pollution. Tighten rules for grazing animals..</li> <li>3. Establish new wetlands- fence off, buffer of native plants to filter run-off from private land. This will provide habitat for native flora and fauna, and protect biodiversity.</li> <li>Start with easiest sites to establish- areas that remain wet all year.</li> <li>4. Encourage farmers to reduce artificial fertilizer and toxic sprays.</li> <li>5. Legislate to stop wetlands being drained and filled in for land use and development.</li> <li>6. Re-direct money from sea-walls to wetland establishment. Spongy surfaces prevent flooding.</li> </ol>
Jacques & Martie Jooste	2, 5 - 7	<p>We agree with NRCs approach to addressing freshwater; however, implementation needs to be practical and in partnership. Our main concerns are:</p> <ol style="list-style-type: none"> <li>1. How are we going to economically farm our land while looking after erodible land and the waterways.</li> <li>2. We are concerned about the cost to fencing and planting, enabling us to operate in our communities for the benefit of food production.</li> <li>3. With loss of land taken out of production, we query that it should be purchased by the crown in certain areas to take away the stress on land owners.</li> <li>4. We are concerned about the ability to control weeds in the setback areas. The bigger the setback areas, the bigger the weed issue.</li> <li>5. A big concern is the consent process proposed. The cost of consultation and consent is at risk of making food production on farms in NZ unaffordable. Our general consensus is that the government should purchase the land that is being "ear marked" from farmers. If we can't afford to farm it, what will happen to our country? Imports will outstrip exports and we don't have enough to survive economically as a country, and not enough to feed our own population.</li> <li>6. Our main aim is to look after 'water'. However, with needing to consult with local iwi, we are concerned disagreements would cost individual farmers their ability to carry on farming.</li> <li>7. A big concern is the time frames. Regulations are stopping us from doing what farmers have always done in looking after the land and water for the next generation.</li> </ol>
Karlene Jordan	1, 2, 4 – 8, 10 & 11	<ol style="list-style-type: none"> <li>1. Your vision and objectives will impact the community, people, and Whanau hugely. The fact that you are putting Wai before people's wellbeing, mental health and lively hoods is obscene. Where is your cost analysis for these proposals? Looks to me that you haven't provided this data because it will cripple our community economically. How many cattle will be culled out of Northland with your vision?</li> </ol> <p>2&amp;4 How many new resource consents will be needed in Northland with your vision?</p>

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		<p>How long will this now take to receive a resource consent in Northland since your vision sees Tanga Whenua consulting with landowners before resource consents are issued? Adding yet another complex layer to a slow inefficient system at present.</p> <p>What is the cost structure Tanga Whenua will be using when charging landowners?</p> <p>Does Tanga Whenua have enough qualified people/facilities to deal with the influx of resource consents?</p> <p>3&amp;7 Highly – erodible land. I've been on your mapping system, and it is inaccurate. My land has areas of red and yellow that shouldn't be and areas with no colour that should be red. Extremely frustrating system you can't map the areas to give a HA effected making feedback also inaccurate with estimated areas and costs only.</p> <p>My feedback is regarding 136 HA owned block, beef farming and 54 HA family lease block also beef.</p> <p>Red and yellow section I'm estimating 40% of my land will be stock excluded or needing a resource consent to farm. There are patches all over the place it is completely unpractical and uneconomical to fence all these areas off to exclude stock. Due to your mapping system, I can't measure the km's of fencing that would be needed to be done. We are in the process of fencing the main river off 2 wire 1,729 meters at \$10 per meter. This is 50% of the cost due to us doing the job and the RC is paying for materials. I can't even imagine the cost to fence off highly – erodible areas that are dotted all over the place. It would be in the tens of thousands of dollars if not hundreds of thousands of dollars just for the job.</p> <p>If 40% of my land is taken from me by you I will loss 40% of my income and yes, you are going to say steep land isn't as productive as flat land and that is true, but the steep land has its purpose and compliments the flat land by extending the cattle's grazing round.</p> <p>I purchased this land Oct 2022 so have a large mortgage. I work full time off the farm and my husband 40% off farm and 60% on farm. We need these off-farm jobs to survive. If you take land from us, we will become unsustainable and unprofitable.</p> <p>We then must look at subdividing land to reduce the mortgagee to stay here, oh but you have plenty of rules around that as well making it difficult to do that. We can only subdivide large sections of land 8 HA of productive land and 4 HA of less productive land. The best solution would have been to cut the 8 HA block into smaller lots for the expanding population.</p> <p>4. This policy will also drive the wrong behaviour of pushing farmers to plant pine trees to try and enter the ETS for carbon credits to try and retain some income from their land, but wait you are then going to try and put policies in place to restrict harvest. You want permanent forest how is that going to play out apart from create a huge fire hazard in 30 years' time and an ugly exotic land scape. Can't imagine this aligning with Tanga Whenua values.</p> <p>I have a photo of my farm taken in the late 60s early 70s with very little vegetation as farmers where subsidized to clear land for farming. It has regenerated over the years, and I have some amazing large native bush areas that I look after. Now you are expecting me to retire more land and look after it with no income/pay back in return.</p> <p>5. How many new resource consents will be needed in Northland with your vision?</p> <p>How long will this now take to receive a resource consent in Northland since your vision sees Tanga Whenua consulting with landowners before resource consents are issued?</p> <p>What is the cost structure Tanga Whenua will be using when charging landowners?</p> <p>Does Tanga Whenua have enough qualified people/facilities to deal with the influx of resource consents?</p> <p>You struggle to approve resource consents in a timely and affordable manner at present but intend to add another complex layer to the system.</p> <p>6. Waterway fencing distance. I'm working on 3m from waterway fencing at present on my farm. The fact that you are talking preferred 10m is very concerning. This will increase my taken grazable land even more. Add another 5 – 10% on top of the already 40% moving me into 45 -</p>

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		<p>50% of my land taken. I can not afford these reductions in my land or the associated costs. My farm will become an uneconomic unit.</p> <p>Is the council paying for these fences?</p> <p>Is the council paying for riparian planting?</p> <p>Is the council paying for weed and pest control?</p> <p>Is the council paying to repair fences and maintain fences and riparian planting after floods?</p> <p>Is the council paying to restore wetlands?</p> <p>Is the council subsidizing my lost income, paying my mortgage and rates?</p> <p>9. If any of these policy's go through in this form funding and support will be absolutely a MUST no body with hill country land will be sustainable or profitable anymore. Therefore, unachievable like the saying goes 'you can't get blood out of a stone'</p> <p>The funding will need to cover the land price (market value), the works needed eg fencing and planting costs and the on going keep of the land eg fencing, weed control, plant management, flood damage and pest control.</p> <p>If the council can't afford the land, they will need to be paying the landowner loss of income on an annual basis depending on cattle prices.</p> <p>The Council must consider the impact this is going to have on individual property owners and the wider community, these policy's will be crippling to the farming and growing owners. The flow on effect will close meat works, dairy plants, local stores, reduced competition, transport, animal welfare, rural schools, vets, mechanics the list goes on.</p> <ul style="list-style-type: none"> <li>Your draft plan is more stringent than the National Policy Statement why is this?</li> <li>Your online Hui's come across with a soft approach and don't provide people the detail they need to complete informed feedback. You didn't speak about the impact 10m set back would have on farmers and growers. Only one speaker spoke about 35-degree stock exclusion no mention of 25 – 35 degrees. No information of the area of land in Northland that would be affected by this policy. It was unclear of how the 20% water allocation would work apart from Tanga Whenua wanting to be paid for their involvement. These sorts of policies are dividing our country we are all New Zealanders and need to be treated as one.</li> <li>I've also attended your drop-in session and you had plenty of verbal feedback. I'm hoping you are taking this feedback on board as much as your written feedback.</li> </ul> <p>Key points of what is happening on farm and what council needs to consider funding moving forward:</p> <ul style="list-style-type: none"> <li>Working towards water exclusion. On my farm we are about 70% there. We have good water reticulation and have a plan to be completed within 5 years of owning the property. Council needs to keep that in mind not everyone has owned properties for many years. We need to be given a lot more time to implement expensive changes on farm.</li> <li>3-meter set back is a reasonable distance for fencing setback if fences haven't been put up, but existing fencing that is within that distance needs to be left alone.</li> <li>Funding needs to be available to landowners for fencing, riparian planting, pest/weed control, and on-going maintenance.</li> <li>Council needs to concentrate on water way exclusion and wetlands (true wetlands) not a few rushers or willow weed in a wetter section of a paddock. Again, support is needed in the way of funding and existing fencing needs to be left alone.</li> <li>Support landowners with FWFP ensuring they are affordable. Because the feedback I've been hearing is anything above 10K just for the plan that's not the certification, verification, and audit fees.</li> <li>You're not even close with fencing of water ways so you need to drop high hill country erodible land it is too much and is unachievable and impractical to implement. Quote from one of your speakers at the drop-in session "the cost will be eye watering" Farmers and growers just can't afford these huge costs, neither can NZ. Erodible land moves with or without stock on it. You</li> </ul>

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		<p>don't have sufficient evidence to exclude stock and plant trees. Native bush slips as well I have evidence of that on my farm. One of your speakers talked about planting totara instead of pine trees because pine tree plantations have no foliage underneath them. I have big old totara trees on my farm and they do the same thing (no foliage underneath) clearly not the answer. We are all aware of the huge damage popular trees cause in cyclone Gabriel, so no one wants to plant them either.</p> <ul style="list-style-type: none"> <li>- You need to drop having to have a resource consent to farm. Many reasons for it but the main two is cost to the farmer and the time it will take. I haven't had an enjoyable experience with the council yet involving resource consents.</li> <li>- Water allocation, this is a very confusing policy which hasn't been explained well at either on-line hui's or drop-in sessions. The fact that the money charged to farmers/growers that apply for the 20% allocation, is going into a fund to support Tanga Whenua landowners is extremely offensive. It should be for all New Zealanders benefit. You are dividing our community and creating racism.</li> </ul>
Matthew Jordan	2, 6, 7, 9 & 10	If these changes go ahead i will lose the use of 90%+ of my farm who is going to reimburse me for my loss of income .the water coming of my place is pristine I haven't used fertiliser for 36 years I and most of my neighbours look after our land and streams and don't need counsel telling as what we can and can't do at the end of the day we own our land not counsel or government .
Peter Julian	6 - 8 & 10	<p>The changes being proposed are "nice to have's" but in reality are unworkable. Just like the SNA maps the Erodible Land mapping covers half of Northland.</p> <p>Many farmers have been bashed by yourself and the last Government and then bashed again by the current economic climate. You seem to believe that by telling them in advance farmers will miraculously be able to pull tens of thousands of dollars per annum out of thin air.</p> <p>Farmers are price takers, they can't just whack up the rates when they need more money and all the rules and regulations you are trying to impose on them are making it very difficult to make a living. (no six figure office jobs here). Surely your policy makers understand the physical reality and realistic cost of fencing off long tracts of streams, wetlands, and steep areas of terrain. It would mean huge costs for even electric fencing let alone seven wire sheep fencing.</p> <p>In my opinion the result of this proposal would be the last nail in the coffin for many farmers and have a negative effect on Northlands economy.</p>
Aorangi Kawiti	1 - 12	<p>(Kaitiakitanga, Manakitanga o te Wai)</p> <p>Managing housing, construction and pollution from all forms of industry and development.</p> <p>Care and management of Repo/ Swamp systems.</p> <p>Maunga ki te moana ecological and filtering systems</p> <p>Providing daily monitoring and reporting systems to all including Maori Tangata Whenua data inwards and outwards</p> <p>I wish to contribute more information orally and written</p>
Steve & Ann Kearney	1, 3, 5 & 6	<p>We are dairy farming and have a great respect and love for the land and water. We have undertaken great lengths to date to fence off waterways and wetlands. We have steep bush areas that are fenced off and maintained. We have completed a farm environment plan and have undertaken the steps highlighted including pest control. I appreciate what NRC are doing to improve freshwater, however it needs to be practical, manageable and actually make a difference and not cost us a lot of money.</p> <p>My concerns are around:</p> <p>Stock exclusion to highly erodible land: Our steep areas from where they are, the pasture and or swamps will collect and sediment if any . When we update our farm environment plan, further management practices will be adopted. I do not believe we should have to double up on this work with getting a consent as well.</p> <p>Fencing off waterways: I struggle to understand what an intermittent waterway is and what would be required under this plan. We farm highly productive land. If I am taking off 10m on each side when</p>

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		<p>there will be little impact, it would be ridiculous. Do we still pay rates for this area? My farm environment plan will address any risk areas.</p> <p>Tangata Whenua</p> <p>I do not believe it is our responsibility to consult with Iwi. I am not qualified to do this, and I do not know anyone who is qualified to talk to? This approach is full of uncertainty and is very alarming. Surely NRC have the ability to control this process and incorporate it into the consent process.</p> <p>During rain the main source of sediment reaching the waterways is from the unsealed road. Even though the run off travels through our wetland the clay is still in suspension and gets into the waterway.</p>
Grant Keymer	6 & 7	<p>Your proposed Stock Exclusion rules would require huge tracts of hill country to be fenced off across Northland. A map of our farm shows yellow areas (slope between 25 and 35 degrees) and red areas (slope over 35 degrees). If these rules come into force, stock would be excluded from about 30% of our farm!</p> <p>On either side of us are large dairy farms, each with more than 200 cows. They have hilly areas out the back, similar to our farm. However, we've never seen more than a handful of cattle on their hills - just a few beef cattle for their freezers. We manage our farm in pretty much the same way. In our immediate area at least, it seems that farmers have chosen to manage their marginal land in a sensitive way, to avoid erosion and other adverse effects on the environment. Yet you are proposing a one-size-fits-all piece of legislation, which would greatly hinder Northland farmers in achieving optimal income from their farms. Not only would useful grazing land be lost, but it would soon be covered in gorse and other noxious weeds which would spread to adjoining paddocks unless sprayed, or otherwise controlled.</p> <p>To make matters worse, you are proposing further stock exclusion zones stretching 10 metres on either side of significant waterways. Elsewhere in the country, a 3 metre exclusion zone is recommended practice. Within the 10 metre zone, the preferred method of weed control would be by hand! Anyone wishing to spray in that zone would need to apply for consent, which could be opposed by landowners downstream. It's hard to think of a more impractical set of rules!</p> <p>I am aware that the chair of NRC has recently been replaced by a farmer and we now have a farmer as our local MP. Thus there is some hope that sanity will prevail.</p>
Fiona King	1, 3, 6 - 11	<p>Basically No – to the Plan – needs a rewrite</p> <ul style="list-style-type: none"> <li>* Fence drains = acceptable - but able to manage drains ie. maintenance + weeds <ul style="list-style-type: none"> <li>- 10 mtr too wide</li> <li>- 5 mtr too wide</li> </ul> </li> <li>* Unaffordable Rates - no more add on fees <ul style="list-style-type: none"> <li>- rate expected of freshwater management to this</li> <li>- ??Pirates??</li> <li>- Northland have large issues to fund as well ie. Infrastructure</li> <li>- any increase in all NRC rates – need to be within 10%</li> </ul> </li> <li>* Farm Drains - Some are within Land Drainage District – managed and maintained by FNDC <ul style="list-style-type: none"> <li>- Need to be able to have spray or weed cleaned on a annual Basis as per their Management plan)</li> </ul> </li> <li>* Fonterra have: Farm Environment Plan - use only one plan <ul style="list-style-type: none"> <li>- do not double up ie. NRC, Fonterra – on different templates</li> </ul> </li> <li>* Plans should not have to go through tangata whenua before being approved = just cost more monies</li> <li>* Certified planner – within rules – no thanks</li> </ul> <p>The plan can be interpreted differently by individual Plans</p> <ul style="list-style-type: none"> <li>* River Bank erosions - who's responsible <ul style="list-style-type: none"> <li>- Spray + weed control beside river edges</li> </ul> </li> </ul>

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		<p>- how do you control kikuyu?</p> <p>* Discharge to water – Sewage schemes not to discharge after 2030. Why?</p> <p>Farms already have to do this now 2024</p> <p>* Tangata whenua – should not have to go through them before (rest of page cut off)</p>
Joe King	2	<p>I have concerns with the highly erodible land rules. We have some area highlighted in the map, however we have proactively fenced off and planted these areas.</p> <p>I believe that farmers have the desire to care for their land and want to keep their soil on their land whilst being productive and profitable. We have seen many farmers manage their farm effectively by managing stock pressure, planting poplars and fencing off unproductive land.</p> <p>By being forced to fence off, a lot of land will go to ruin. Gorse and other weeds will get out of control, creating an increased weed burden on the rest of the farm. the same goes for pest pressure. It is my belief that Kikuyu is an effective means of soil retention.</p> <p>We have completed a farm environment plan which has highlighted an action plan for our property.</p> <p>In the words of US Founding Father James Wilson</p> <p>'What belongs to no one is wasted by everyone. What belongs to one man in particular is the object of his economy and care'.</p>
Stephen King	2 & 4	<p>I am a forest advocate with expertise in native forest ecology and 40 years' experience in native forest restoration. I am the founder of the NZ Native Forests Restoration Trust and a co-founder of the Waipoua Forest Trust. Together these Trusts and myself have secured over 2,000 hectares of reserve land in Northland on which large scale native revegetation methods have been pioneered and implemented since 1985. I wish to speak to my submission in person and present photographic and map evidence in support of my deep concerns and recommendations. The future of our native forests is at stake.</p> <p>The Risk: Retiring land from pasture, revegetation or conversion to plantation forest presents a major risk to Northland's native forests by creating invasive weed infestation sites and weed dispersal corridors. Key actions and substantial investment need to be made in strategic weed control and cleaning up weed dispersal corridors before it is wise or appropriate to retire more lands and create weed buking up sites. Wrongly timed, the net effect will be negative and present major costs on future generations and threats to other existing land users.</p> <p>Background: NZ's native bird species have been decimated by the introduction of mammalian pests. We face the same threat to the integrity, biodiversity and survival of our native forests, wetlands and dune systems from exotic invasive weeds. Most of these weeds are still in an infancy state of dispersal and impact in the environment. ONZ has approximately 2500 native vascular plant species with approx. 25,000 introduced species of which roughly 10% have become naturalised. Approximately 10% of those are invasive weeds of native ecosystems. There is presently a smaller number that are in a early stage of rapid phase of spread in Northland e.g. Taiwan Cherry, Privet, or that present an irreversible large scale invasion threat e.g. Bangalow Palm.</p> <p>If we are to become serious about protecting Northland's unique forests we must commit to eradication of a modest range of these weeds, including Privet, Ginger, Cotoneaster, Bangalow Palm, Ivy, Climbing Asparagus, Taiwan Cherry.</p> <p>Total eradication is the only viable long-term goal, given that when hinterland weed saturation level is reached the cost of defending boundaries of DOC and private reserves will be astronomically higher and less practical than eradication now.</p> <p>We are not used to serious investment or eradication, so this negatively impacts on our current vision of achievability, much as it did for island cat and rat eradication in the 1970s. Strategically planned and resourced eradication plans can and must work if we are to offer our descendants anything other than dinosaur style textbooks of our forests.</p> <p>Eradication must and CAN be achieved through a strategic, well-resourced plan that relies on Net Sustained Progress in 5 areas:</p> <ol style="list-style-type: none"> <li>1. Eradication of new and outlier infestations.</li> <li>2. Eradication of these weeds in dispersal corridors, principally State and council roads and waterways.</li> </ol>

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		<p>3. The reserves and buffer zones around them (including control of mynahs , the most influential long distance seed disperser of most weeds).</p> <p>4. Weed bulking up sites, especially plantation forests but also native planting areas and unkempt land.</p> <p>5. Private properties, settlements and buffer zones surrounding towns.</p> <p>At the head of this of course is the need to effectively stop the continued irresponsible release of new weeds through garden centres e.g. Kermadec Island Weed Palm and 'Macho Fern' (<i>Nephrolepis biserrata</i> ). Macho Fern is already banned in two Australian States, disperses by spore, spreads like bracken, grows in shade or sun to 2 metres , set to destroy our forests. That such plants continue to be released demonstrates the need to legislate controls over the nursery industry to create a safe trading environment for producer and customer just as we have for other dangerous goods. Without such an approach, well-meaning efforts by landowners will ultimately be undermined.</p> <p>I recommend that NO new land retirement or conversion to native or plantation forestry be encouraged by NRC until adequate weed control strategy is being implemented sufficient to progressively and effectively reduce the invasion risk to such lands and to the national conservation estate. This needs to address the 5 Eradication strategy points itemised above, plus the new incursion risks through the nursery industry.</p> <p>Essential practical steps that can be immediately taken are:</p> <p>1. Implement transport corridor invasive weed control on the main weeds present in a manner that genuinely aims at eradication and not simply lip service expenditure. For State Highways existing weed contracts and obligations exist for Privet but are characterised by intermittent spasmodic spurts of spraying and are not being professionally implemented, with well-timed knockdown and follow up cycles. With a professional approach the goal of sustained eradication is fully achievable on highways. Funds for work on council roads can be a mixture of council budget plus potentially Ministry for Environment funds to protect waterway plantings from also becoming major weed dispersal corridors.</p> <p>The main transport corridor (road and rail) species are: Privet (both species), Ginger, Cotoneaster, Taiwan Cherry, Japanese Honeysuckle. Pampas is also present, but the environmental gains of control are less given its ubiquitous presence and wind dispersal.</p> <p>A few other species exist on roadsides only occasionally and can be included in the mop up and follow up programs.</p> <p>2. Develop and implement an ERADICATION STRATEGY for Taiwan Cherry and Bangalow Palm which are poised on a critical and explosive spread threshold that requires urgent action. They threaten to transform our native forests. We must act. Every lost year results in greatly increased costs. In the case of Bangalow Palm, the impacts are irreversible due to the extreme difficulty of control in large native forests. Macho Fern, being spore dispersed falls into the same category. Additional retired (abandoned) lands simply create bulking up sites for such species. Look no further than Kioreroa Road.</p> <p>3. Investment in employing dedicated weed eradicators for isolated new infestations. These are high yield and cost-effective investments comparable to demining or 'finger in the dyke' actions to buy time and prevent new escalating issues e.g. <i>Helichrysum petulare</i> (260m2) and <i>Green Cestrum</i> (2 plants) on SH 12, six mature Bangalow Palms on 3 properties all at Kaihu. A stitch in time can save a million.</p> <p>4. Require Forest Plantation owners to effectively manage invasive weeds on their properties. Current management is resulting in weed proliferation to the cost of future generations and other landowners. Get the government to own the massive 500 ha Ginger and Black Wattle weed problem it created at Waipoua and invest before it takes over the nation's most treasured Kauri Forest. This is a glaring example of what results from a head in the sand approach to weeds which is what is currently happening with waterway plantings, exotic afforestation and proposals to retire erodible lands. If the government acted on its weed infestation in the 1990s when asked, the then 30 hectare infestation could have been easily eradicated. Now others attempting native reforestation are paying a high price for such negligence. We cannot afford to repeat this mistake.</p> <p>Summary: The time is NOT right for retiring more lands UNTIL the weed dispersal corridors and weed sources are effectively addressed. Continuing on the current blinkered path will only land the next generation in a worse position with astronomically higher costs, and worse irretrievable invasion of native forests by some weed species.</p>

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		Council needs to be honest and up front about the real costs and risks to landholders about large scale retirement of grazing land. Please refer to my request for a personal hearing on this vitally important matter.
Kerry Knight	2 & 7	Being a recent landlord owner I have no issue with rules being imposed that take 20 years or so to put into place. Any rules that have the effect of changing the economics too quickly need to be taken into account as set out in the RMA.  Much of Northland is hilly and steep. Stock grazing should be equivalent to the topography. Very steep, then minimal grazing or lower weighted animals only. Not blanket no without a consent .ie rules like effluent discharge should be introduced. Not the requirements for ongoing resource consents
Korokota Marae (Finnisha Tuhiwai-Birchall)	1 - 11	Korokota Marae would like to host a Hui regarding this Kaupapa so our people are well informed of the implications of this matter.
Oliver Krollmann	1 & 11	Congratulations on the development of such an impressive draft Freshwater Plan Change. Given the time we have already wasted and the damage we have already done I want us to adopt the most ambitious settings as the future Freshwater Plan Change. The time to act is now.  With regards to the landowners who cannot or will not be willing to pay for the necessary measures, we have to ask ourselves what our values are. Given all the knowledge we have gained and evidence we have gathered over the last decades, if a business is only viable when allowed to continue to cause medium-to-long term pollution for short-term economic gain, does this business have a social licence to continue to exist? What rights or privileges has a polluting business accumulated that justify its continued operation under the same, or just mildly and unambitiously adjusted conditions? If we allow this to continue unchallenged, how do we expect our children and grandchildren to manage and rectify a situation that will be even worse than the one we find ourselves in now, and why are we happy to put this huge burden on them?  While the whole notion of having to "make funding support worthwhile to a landowner" feels strongly like rewarding bad management and decades of resistance to change, we have to be willing to consider such a scheme and contribute to it. We all have allowed our bad behaviours to go on for way too long, and a finger-pointing "us and them" attitude will not move us forward where we need to be. We need to send a strong signal that we are collectively willing to do better, throw our full support for both action and funding behind this Freshwater Plan Change, establish a precedence in New Zealand (if not the world) how to heal a damaged ecosystem, and ask central government for additional funding support to deliver the proof that we can do this.  For decades we have given the idea of unlimited economic growth in a finite world the benefit of the doubt, and it has not been working out well for us and every living being on this planet, as we increasingly see and experience ourselves and all over the world. Pushback against meaningful action is strong, because it becomes harder every day to change course and turn things around. We have to ask ourselves if we are happy to continue to tag along and pretend that it will somehow magically work out all of a sudden by doing more of the same that hasn't been working, or if we accept the challenge to switch from exploitation based on individual property rights and destruction of our biosphere to an economy of collective wellbeing within ecological limits.
Steve Kruithof	5 - 10	I think your stock exclusion is unachievable with out imposing extreme financial burdens on farmers, in a lot of cases will cause the farm to be no longer economically viable without being prepared to pay the farmers for their on going financial losses.  Also this plan should be in the best interest of ALL NEW ZEALANDERS not racially prejudiced to the specific benefit of one race above all others.  I would like to see water quality improvement in NZ but done with common sense and in a way that supports farmers and land owners instead of penalizing them, with the best interests of all New Zealanders guiding the way.
Lake Ōmāpere Trust (John Tiatoa)	1 - 12	The vision, objectives are defined within our Lake Ōmāpere Trust - Northland Regional Council - Relationship Agreement. <i>(can be provided if required)</i>

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		<p>The targets, objectives within your draft freshwater plan and draft action plan we support within the context of future management and restoration of Lake Omapere catchment plan via:</p> <ol style="list-style-type: none"> <li>1. Managing highly - erodible land around Lake Omapere catchment plan</li> <li>2. Eliminating discharges to water within Lake Omapere catchment plan</li> <li>3. Managing exotic forests within Lake Omapere catchment plan</li> <li>4. Managing impacts on tāngata whenua values acknowledgement of Te Mana o te Wai within Lake Omapere catchment plan</li> <li>5. Stock exclusion – distance from waterways within Lake Omapere catchment plan</li> <li>6. Stock exclusion – highly-erodible land within Lake Omapere catchment plan</li> <li>7. Timeframes for stock exclusion rules</li> <li>8. Managing water allocation within Lake Omapere catchment plan</li> <li>9. Enabling tāngata whenua to practice as kaitiaki for wai within Lake Omapere catchment plan and have representation on the tāngata whenua water advisory group and primary sector Liaison group.</li> <li>10. Support and funding for efforts to improve freshwater within the Lake Omapere catchment plan</li> <li>11. Something else –</li> </ol> <p>Targeted Water allocation Policy for Lake Omapere catchment and Waitangi catchment, Hokianga catchment, Punakitere catchment all waterways/ all streams/all rivers are connected to high lands of Lake Omapere catchment. Also noting the Waimate/Ohaeawai aquifer, Okaihau/Waihou aquifer and Kaikohe/Punakitere aquifer are connected to Lake Omapere as well.</p> <p>Lake Omapere catchment plan is to improve freshwater health when we support Freshwater Plan via:</p> <ol style="list-style-type: none"> <li>1. Freshwater plan change (rules) to support restoration of Lake Omapere</li> <li>2. Government funded projects: Lake Omapere</li> <li>3. Landowner voluntary actions: Farmer of Lake Omapere</li> <li>4. Primary sector organisation: Lake Omapere</li> <li>5. Freshwater Farm plans: Lake Omapere</li> <li>6. Landcare groups: Lake Omapere</li> <li>7. Kaitiaki: Lake Omapere</li> <li>8. Northland Regional Council actions for Lake Omapere</li> <li>9. NPS-FM set from bottom lines for health waterways: Lake Omapere/Utakura river/Hokianga</li> </ol> <p>We need to discuss Targeted Water allocation Policy Lake Omapere Catchments and surrounding Catchments</p>
Colin Lamb	1, 2, 6, 7 & 11	<p>Being part of the fourth generation of our family to live on, and operate, the farm (part of which was purchased in August 1886) is very special to me, and drives me to run the farm in a way that, is not only sustainable, but builds on that heritage. I undertake to maintain, and further develop, a sound herd of quality Angus breeding cows while maintaining, protecting and further developing the land of my ancestors, taku Turangawaewae (place of belonging). Ko au te whenua. Ko te whenua ko au. (I am the land. The land is me.). A review of the farm water system is underway with the intent of extending the reticulated system so several paddocks are no longer reliant on drains for drinking water. I am not against environmental enhancement, having worked on getting covenants with QEII National Trust on 3 areas of native bush and have plans to fence up to another 7, although due to size these will not all be covenanted.</p> <p>But if the proposals for wider, planted, setbacks around drains and retirement, and planting, of slopes over 25 degrees go ahead, it will bankrupt me. Our farm (228ha plus 20ha lease) struggles to make a trading profit, while trying to catch up on some deferred maintenance, without the extra costs these regulations would impose.</p> <p>Without having economically, and socially, viable farms and communities, the environmental works are meaningless. The maintenance of weed and pest control is vital to prevent these areas becoming havens for rats, possums, Old-man's Beard and Taiwan Cherries, to name but a few.</p>

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		<p>I am disappointed with the number of changes being brought by this draft plan and lack of consultation on proposals before they became policies in the draft plan. Especially when there is so much uncertainty of regulatory framework with the Government signalling changes to many of the Acts the Regional Plan operates under.</p> <p><b>Setbacks</b></p> <p>Using the figures given in the consultation documents, a 10m planted setback will cost the average farm \$21,800 to \$43,000, on average, every year for 30 years. But 70% of this is expected to be occurred in the first 5 years and does not take into account the cost of weed and pest control, which is going to be significant if the expectation is that weeds will be controlled by hand and not chemical and/or mechanical methods.</p> <p>Therefore, for the first five years setbacks will cost \$91,560 to \$180,600 (<math>\\$21,800 \times 30 \times 70\% \div 5</math>) per year and then \$7,848 to \$15,480 (<math>\\$21,800 \times 30 \times 30\% \div 25</math>) per year for the next 25 years while paying to retire slopes over 25 degrees and wetlands.</p> <p>These figures do not include any required earthworks or culverts which will be required to maintain access to other areas and allow for cleaning and weed and pest control operations. Nor do they allow anything for fertiliser, weed mat or tree protectors when planting, so could easily be another \$10,000 - \$20,000 per year during the establishment period for these costs, where they are required</p> <p>Costs of providing alternative stock drinking water is another cost not taken into account in these figures but will be a factor for most Northland drystock units.</p> <p>If there is not on-going funding for maintenance, the setback zones are going to become seed and fragment sources for the spread of weed species if the expectation is that farmers will hand weed these areas, as was suggested to a neighbour by the Fonterra Inspector. This is more likely the larger the riparian setbacks are.</p> <p>I spend between 40 and 70 hours most years repairing flood damage to existing fences, spending well over 200 hours after Cyclone Gabrielle and subsequent flood events. I am reluctant to add to the length of fences in the flood zones and know several people who have removed the wires from fences in the flood zones due to the amount of time required to remove the flood debris from them and effect repairs.</p> <p><b>Slopes</b></p> <p>I am not saying some of my steepest slopes would be better being retired but I have plans to do this strategically, incorporating pest control, rather than a wholesale or blanket approach. With a lower stocking rate and only grazing the steepest hills with 10 - 22 month old steers, rather than older stock, we are reducing the impact of grazing these areas. Dams and cut-aways, along the side of metalised races, intercept silt and debris before they enter the drains. Material is regularly cleaned and used to fill hollows around the paddocks further reducing sediment leaving the property.</p> <p>What is the justification for starting restrictions at 25%? Why not 30 degrees or even 28 degrees. Can find not information in consultation documents about this.</p> <p>I don't want to see areas of Northland, in 30 years, looking like the Esk Valley, Napier following Cyclone Gabrielle. Trees planted after Cyclone Bola became battering rams and formed dams around bridge abutments and piles causing the flooding, and resulting infrastructure damage to be much worse. Large scale planting needs careful planning. We need to be looking at right trees, in the right place, for the right reason. Not wholesale planting.</p> <p>The accuracy of the slope maps is questionable with the height of trees, buildings, water tanks etc, relative to surrounding ground, or areas of shadow, are being read as sloping ground. The water surface of one of my dams has both yellow and red on it because of areas of shadow from trees above the dam..</p> <p>Estimated cost for the average farm of \$16,500 to \$24,700 per year, over 30 years, means \$69,310 to \$103,740 per year for the first 5 (<math>\\$16,500 \times 30 \times 70\% \div 5</math>) and \$5,940 to \$8,892 per year for maintenance over the next 25 years. When added to the maintenance of the riparian plantings this is estimated at \$77,158 to \$119,220 For 5 years and then \$13,788 to \$24,372 for the 20 years. These figures are so far above what is affordable for my operation that I would be forced to intensify by increasing fertility and stocking rate, which would also increase pressure of resources or sell out.</p>

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		While carbon credit are an option for some areas to generate further income I am feeling the squeeze these proposals would create by retiring riparian areas and hills leaving me stuck in the middle with an uneconomic unit.
David Lawrence-Solomon	2, 3, 6 & 7	<p>Having grown up working with livestock, and with my move into a career in conservation (already jeopardized by the current government), I just wanted to encourage you in the move to exclude stock from watercourses and erodible land.</p> <p>There will be many, many entitled and ignorant voices that will say you're doing the wrong thing, but they are the ones in the wrong. All they care about is the gaining of revenue for themselves, ignoring the long-term good of this country.</p> <p>It's going to be hard, but well worth the mahi. Thank you.</p>
Shane Lawson	2, 5 - 7	<p>We agree with the direction NRC is taking to address fresh water and it is good the see that the real issues are being addressed (i.e not N) We are the caretakers of the land and want to leave the land and water in better quality than when we started.</p> <p>Some of the requirements in the draft plan seem impractical and costly when it does not need to be. There are a number of adjustments we have made to our system to ensure we have a minimal impact on fresh water including:</p> <ul style="list-style-type: none"> <li>grazing management plans to reduce soil disturbance</li> <li>Fencing off of all permanent water ways</li> <li>Reduced stocking rate</li> <li>Reduced most of my nutrient inputs</li> <li>Completed a farm environment plan</li> </ul> <p>It concerns me that I will need to get further consent to manage what I am already doing. The farm environment plan is a great tool to ensure that my management practices address the potential risks. 10m on intermittent waterways is excessive on certain waterways and would be costly for little to no gain. Good management practices are best.</p> <p>Further to the consenting process, the requirements for tangata whenua consultation is unsettling. NRC should be aware of the values of the area and manage it accordingly. There is great uncertainty in giving this control over to other parties. Will there be additional costs? Will some parties make it more difficult than others? Who is qualified to give consult?</p>
Joseph Leslie	1 - 10	<p>No do not want it.</p> <p>Totally over the top and taking away our right to farm !!</p>
Neil Lewis	1, 5 – 7 & 10	<p>There are areas of the proposed plan that affect me and some that do not however I am concerned how it will affect Northland as a whole.</p> <p>With stock exclusion, I believe there will be land left fellow and abandoned as it will not be viable to manage. This land will become inhabited by pests. Doc and Maori reserves along side my farm are like this. They are full of possums, rabbits, and peacocks which destroy our maize crops. In other places I am aware that councils and Doc are unable to control pigs, deer, goats and now wallabies. These pests will become uncontrollable if large blocks of steep lands covered in good grass is left abandoned. The potential pest control expense to rate payers can be avoided. Similarly, these pests come with the serious risk of overstocking and causing the erosion that we are trying to avoid. These pests are known carriers of diseases such as leptospirosis and TB.</p> <p>On our farm we have identified our steep lands and undertaken management plans on it. All slopes are different and should have different management. Different soil types require different management. I have faces covered in kikuyu that are vertical in places that will never erode as they are basalt, yet your plan would exclude cattle from these areas.</p> <p>It is my opinion that more needs to be done managing heavy clay flats. These areas grow a lot of grass and require high stocking rates to eat that grass. As a result, there is a far greater risk of creating sediment than hill country which grows less grass, has a lower stocking rate and often has lighter younger cattle grazing it.</p>

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		<p>A real concern of mine is how Council treats farmers who operate concrete feed lots and stand off pads. Your inspectors put too much pressure on these good farmers. These farmers are doing the right thing by taking cows off pastures and stopping the risk of creating sediment run off. They spend a lot of money building their pads. I have a top class covered feed pad that is only used in really wet weather. Your inspector worries that a cow peeing inside may cause splashes outside. That is a joke. The whole mob could be outside peeing, pooing, and making mud. The thing is other not so good farmers do just make mud and others stand their cattle on metal pads and others put them on sections of their races. There those cows make the same effluent and more sediment on the unseal surfaces that all ends up in our fresh water. Farmers housing cows properly should be congratulated, and the question asked of others as what their wet weather plan is,</p> <p>What really hurts me is the sediment coming off our unsealed metal roads. It comes off in huge clouds of dust in summers and washed away as mud in winters. Council should enquire from the districts how many tonnes of maintenance metal is put on roads each year as that amount has been lost to our fresh water. On the road I live it use to be two lanes wide. Now the water course on one side has erode away one lane and is 1.5 metres deep in places. That is many tones of sediment gone straight into the Wairua, however your freshwater plan does not recognise this which is far greater provider of sediment that well farmed hill country.</p> <p>Being a proposed comprehensive freshwater plan, the plan should identify all of the hydro electricity sites in Northland and allow for their development as is directed by the National Policy on Renewable Energy. Hydro stations can injection air into water and raise rivers dissolved oxygen levels to make them healthy for freshwater fishes to live in.</p> <p>Again, being a comprehensive fresh water plan I would expect urban contamination of our freshwater to be addressed. It is not.</p> <p>Storm water entering the sewer system should be unlawful. All new builds should have to have storage water tanks. The water to be used for their toilets, gardens and car wash etc. All existing houses given a time frame to install the same tanks. A similar timeframe as what you give dairy farmers to change costly effluent things when you change rules.</p> <p>Urban houses should have to use their bath, shower and washing waters within their sections, watering trees and gardens.</p> <p>When urban residence wash their cars and houses and surrounds the water used, the chemicals used, and the filth wash all go onto our freshwater system without the risk of fines and having a resource consent.</p> <p>There is no mention re the micro plastic, plastic and rubbish entering our fresh water which flows into our harbour. Plastic does a lot more harm than cow dung which is just chewed grass.</p> <p>Huge amounts of rubber is worn off tyres onto roads and into out waterways. Next time you go over the Auckland harbour bridge look at the grey colour of the Waitamata harbour. It's the colour of tyres and not a cow about to blame.</p> <p>When a Council makes rules, the process must be fair, and the resulting rules must be fair. This proposed plan is a one sided attack on farmers which ignores urban and council freshwater contaminations.</p> <p>I am concerned at the push to plant trees along rivers and on lands above rivers. Cyclone Gabrielle was a massive example of the damage trees do to rivers. In Kerikeri in about 1982 we had a fatal incident where trees upriver washed down forming a series of coffer dams. After the top dam burst a wall of water flowed down and took out the next, and next etc dams. When it hit Kerikeri the wall of water and tree debris smashed through a new block of apartments houses opposite the stone store killing one resident. The Regional Council vowed they would not let that situation happen again. I fear we are planting the trees for a future event. Who will take responsibility?</p> <p>Your plan seems to include giving water rights to Maori. I agree with this if it is to Maori farmers, vegetable growers orchardist and other Maori water uses. It is wrong to give water right to Iwi, hapu and Maori water committees etc to then sell off. Water rights should be fair. It is unfair for any person or company to have large water rights and not use the water when others need the water.</p>

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		<p>Finally, I have issues with the proposed Maori consultation requirements for consent. Currently you have lists of groups that you require consultation and all as a result of trying to be true to the Treaty of Waitangi 's principles. Great but when a Maori is actually the applicant you do the opposite to the Maori laws and custom that the treaty is meant to protect.</p> <p>The Maori principle in land rights is Ahi kaa. This is the culture referring to the land rights of visible occupation, it establishes the mana whenua (authority over the land). It is commonly known as 'keeping the fires going' and means that the authority over the land and adjoining water bodies belongs to those who live on and care for the lands.</p> <p>If the lands are abandoned, it is ahitere (unstable fire) and if lands are never or rarely even used it is ahimataotao (cold extinguished fire)</p> <p>One of the problems with consultation plans are that the Maori living on the land and even as the applicant for something has no say, instead Council goes to Maori living in cities who have never lived on lands and who are ahimataotao.</p> <p>The tangata whenua of land is the people living, working and caring for that land. Those who live adjacent to freshwater bodies also have the mana awa over that part of the water not any person who lives away in cities. Hapu and Iwi don't keep the fires going, it's the tangata whenua the actual Treaty is about treating Maori landowners fairly and the same as the non-Maori.</p>
Bryce Liggett	6 – 8 & 11	<p>As long as a fence is up so animals cannot get into the waterways, weather that is 1 metre or 3 metres away it should not have effect.</p> <p>I believe that if we have to make changes that there should be funding to help cover costs.</p>
Karin Lindroth-Trimble	1 – 4, 6 & 7	<p>I would like to urge the Northland Regional Council to urgently address freshwater issues to safeguard public health and our ecosystem, integral to our identity. Specifically, by:</p> <ul style="list-style-type: none"> <li>a. Protecting ecosystem health by setting clear targets for nitrogen and phosphorus levels and integrating them into resource use limits. Additionally, ensure Te Mana o te Wai is upheld throughout the plan.</li> <li>b. Safeguarding groundwater quality by establishing a target nitrate-nitrogen level of less than 1.0 mg/L.</li> <li>c. Implementing rules to protect erosion-prone land, including limitations on vegetation clearance and stock exclusion.</li> <li>d. Keeping livestock out of waterways by enforcing setback rules and implementing regulations for stream areas and fencing.</li> <li>e. Eliminating and reducing discharges, such as requiring consent for dairy effluent and stricter regulations for wastewater treatment plants.</li> <li>f. Preserving wetlands through prohibition of drainage, stock exclusion, restoration encouragement, and monitoring.</li> <li>g. Regulating exotic forestry with larger setbacks and requiring consent for plantation forestry, especially in sensitive areas.</li> <li>h. Enhancing cultural impact assessments for freshwater projects.</li> <li>i. Phasing out water over-allocation through short-term consents and setting aside unallocated water for environmental enhancement.</li> <li>j. Addressing nutrient pollution from agriculture with a robust allocation system.</li> <li>k. Prioritizing nature-based solutions over engineered ones for flood protection and safeguarding existing natural features.</li> <li>l. Improving river management by regulating activities in river beds and setting target attribute states for natural character and physical habitat.</li> <li>m. Protecting coastal water quality and setting target attributes for estuaries and coastal areas.</li> </ul>
Elisabeth Long	6	<p>I would like the present status quo to remain on the present two wire fencing and only three metres from the stream so sheep can move under the wires to graze at drain edges..</p>

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		The lifestyle block that the above occurs in does not have a very high stocking rate so there is not an extreme manure runoff
David Lourie		<p>Would you please accept this late additional matter for consideration in the Fresh Water Plan submission process</p> <p>We need greater protections for coastal wetlands. Healthy coastal wetlands will help maintain coastal aquifers by maintaining a head of water pressure that pushes back underground seawater intrusion. Coastal aquifers are critically important for many farmers and growers operating businesses in coastal areas. It should be noted that much of the most productive lands for food production are in coastal areas due to nutrient migration, alluvial soils and proximity to water for irrigation and providing water to livestock.</p> <p>There is currently a fad amongst surfers to cut channels from beaches to back-dune wetlands so they can surf on the standing waves created by the outflow. Although obviously a great deal of fun for the participants it can be very damaging to the habitat of many species specialised in living in these already threatened areas. Not only is this a threat to habitat and species it is a threat to the volumes of water available for commercial use but also the salinity of the remaining water from seawater intrusion.</p> <p>I submit that Coastal wetlands are mapped. Where vehicles currently have access to the beaches in front of the wetlands, that vehicle access on those beaches is prohibited.</p> <p>Reason. Vehicles that start off driving up and down dunes, erode the dunes through the Bulldozing effect to a point where vehicles drive through the little canyons they create in the front dunes to the swale behind. The continued use of the vehicles through the dunes encourages backyard adventurers to open up more canyons in close proximity to each other until the walls between the separate canyons erode and there is one massive blowout. The fore dunes act as a barrier, a dyke, that stops the ingress of the sea inland. This barrier also protects the wetlands from being breached and draining into the sea.</p> <p>I submit that those who drain wetlands for such purposes be prosecuted in the same manner as any other person draining wetlands illegally for any other purpose.</p>
Marianne Lovell	2, 6 & 7	<p>The estimated costs for landowners are way too low. They should be per hectare not per farm. The costs are so low you must have averaged across lifestyle blocks as well as commercial farms.</p> <p>The costs only allow for fencing and lost production. On our farm we have found by far the biggest cost is providing an alternative water source for stock. In Northland most farms will have to construct dams and pump water up and over many hills. We have so far done about one third of our farm and it has cost over \$200,000 without having to construct a dam. This cost needs to be taken into account.</p> <p>The cost of riparian planting is way too low. With so much kikuyu around it is really hard to get plants well established and there are way higher mortality rates of plants than elsewhere in NZ.</p> <p>Fencing the highly erodible land will in most cases not be possible without losing all of Northland's hill country. If you look at your own map the areas are so irregular and broken up that it is just not feasible. Planting in natives over all of Northland hill country would be hugely expensive. The carbon credit market may provide some income for the landowners to live on, but would mean staff would be let go and there would be no money to spend with town businesses.</p> <p>Planting in exotics would likewise send Northland broke and mean most of the population would leave. Large areas of Northland were planted in pines in the 1980s, resulting in us being one of the poorest areas in NZ and with most of the young people leaving the district for work. 25 - 30 years without decent income just doesn't work. People go broke and sell out to foreign interests. Please don't send us back there! This time around there is no guarantee that there will be a market for the timber when it is grown as China has planted large areas of it's own land.</p> <p>Sediment trap areas at the base of hills would make more sense economically and probably do a better job. Areas planted in trees do still slip. For example Parihaka and the western hills in Whangarei. These sediment trap areas could also be used to establish wetlands. NRC could help with advice and easing the consent process.</p> <p>There is no mention of weed control in the setbacks from waterways. Already around Northland there are large weed infestations in many of the fenced off areas. Spraying chemicals in waterways is not on</p>

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		and would be too expensive anyway with farmers' reduced income. Physical weed removal is not practical with even as little as a 3 metre setback, let alone anything bigger. As your own report states, long grass does a good job of removing sediment. There are other ways to help with E.Coli. Perhaps you could subsidise dung beetles as other councils have. There is also no mention of research into the sources of E.Coli in Northland waterways. Fencing will not help if it is coming from birds or out of the soil.
Lucklaw Farm (John Sturges)	1 & 3	<p>Lucklaw Farm owns and leases several contiguous blocks of land in the Far North that largely adjoin Department of Conservation (DOC) managed marginal strips, the Crown owned Rangiputa Station and the Rangiputa settlement with it's associated Northland Regional Council (NRC) consented sewerage scheme (see attached map).</p> <p>Within these boundaries are two shallow dune lakes (Lakes Rotokawau) that were once ranked highly by the NRC that are nowadays suffering from increasing nutrient loadings largely the result of the increasing stock and local and tourist human populations.</p> <p>The areas around these lakes are home to numerous endangered animals that are trying survive in the declining Lake freshwater quality. This water moves laterally over the pan towards the beach taking contaminants with the water. The contaminated fresh water seeps out of the sand onto the beach and foreshore (the Coastal Marine Area - CMA), where it can contaminate kai moana, shellfish and the marine organisms fish and sea shorebirds feed on.</p> <p>Objective 3.16 Te Mana me te Mauri o te Wai - Lucklaw Farm support in principle this new Objectives a it is important that each generation strives to now improves the fresh water quality. Clearly the wording needs further consideration.</p> <p>C.1 Coastal activities - Lucklaw Farm do not agree that these NRC provisions do not need revisiting. Areas of freshwater can exist in the areas of NRC mapped CMA. Endangered plants exist on the brackish water margins. These areas result from the changing sea levels and dune erosion as a result of natural forces and the rapid increase in vehicles on the land boundary of the CMA.</p> <p>C.6.9.3 Discharge of fertiliser – permitted activity - Lucklaw Farm do not agree that the provision: “3) Fertiliser is not applied within 20 metres of the bed of a dune lake with high or outstanding ecological value or the bed of an outstanding lake” sufficiently protects the freshwater Rotokawau dunes lakes or the Kawau (Shags) that live in the Pohutukawa trees that adjoin these lakes.</p> <p>C.6.2 Wastewater network and treatment plant discharges - Lucklaw Farm considers that these provisions may not sufficiently protect the freshwater quality (e.g.: the definitions of treated and untreated wastewater need to be properly defined etc.)</p> <p>Lucklaw Farm would like to speak at any hearing regarding these matters.</p>
Philip Mabin	1, 2, 4 – 8, 10 & 12	<p>(Equable policy implementation)</p> <p># The vision, and objectives and/or targets need to be realistic, not divisive. They need to be even handed, and look beyond just targeting rural land owners, fencing waterways, wetlands and stock grazing.</p> <p>The goals need to be achievable. The plan should not be punitive. People do matter. The idea that water is more important than people, is farcical, in that the statement is made by people. Its a human idea. Water exists in nature, naturally, not as an entity with feelings. That is a people/human concept. In context with the draft plan, it seems that water is only more important than some people. Can NRC show the science that the water spirit exists, not just that some people believe so.</p> <p># Managing highly erodible land.</p> <p>There are so many variables around this, and management options that counter the broad brush generalist approach of stock exclusion. Some steep areas can be retired, some grazed at specific times of the year, poplars planted and grazing continued. Maintaining good pasture cover and grazing with sheep or smaller grades of cattle are all management tools. some areas its irrelevant as there is little erosion. Sediment control is what fencing waterways and wetlands is meant to be achieving. The NRC maps actually identify that a large portion of the "red" areas are already in water courses and streams. These should be retired from grazing already.</p>

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		<p>Currently state Highway one , in Northland, is shut in 2 places due to slips. The Mangamuka's and Brynderwyn's are both bush and forest clad. Yet have major erosion issues.</p> <p>In the first instance, focus for properties with erodible areas should be protecting the waterways. This will take time and money, and should be the initial objective, without adding extra fencing costs. The loss of income from stock exclusion, to help fund that fencing is a real outcome , for what seems to be an ideological position.</p> <p>A neighbouring property to ours has had stock excluded due to being planted in pines. The feral pig population has increased in one year. The pigs are rooting in the gullies where the ground holds its moisture. The property is higher in the catchment than our property. that means instant sediment movement into our stream. Eradicating feral pigs has to be a part of any fresh water plan. The damage done by feral pigs in our area is far more relevant than excluding stock from some areas of people's properties.</p> <p>An unintended consequence of excluding stock from some areas is access and maintenance of the power network. We maintain a track which maintains access for ourselves and also the power company. If we have to exclude stock from that area, why would continue to maintain the track.</p> <p># Managing impacts on tangata whenua values.</p> <p>Its not up to private land owners to " manage" other cultures values. All cultures should be shown respect and respect each other. But cultural values are specific to all cultures. We are the owners of our property. We are not visitors or guests .That ownership is recognised by the regional council as they charge us, the owners, rates. The NZ Bill of Rights states that we are all protected in the right to hold our own spiritual, cultural and religious beliefs.</p> <p>Northland Regional Council staff, as public servants, should not be putting rate payers in the position of having to explain this. While Council is required to include cultural values into the work that they do, they cannot impose a cultural value system across all rate payers, with disregard of land owners own beliefs. Respect all cultures .</p> <p>#Stock exclusion- distance from waterways.</p> <p>An arbitrary, desk top approach prescribing the minimum distance is a good example of ideals verses reality. Rivers/streams and wet lands need to be treated differently as each natural system operates differently and has different physical attributes. There is so many site variables with stream fencing. The physical characteristics, dictate the fence line.</p> <p>We have fenced off areas of our property , in partnership with NRC. While the minimum distance from the stream is 3m, the average is close to 50m. But the minimum was used where needed.</p> <p>A 3m distance allows for the practical realities of building fence lines from a waterway. A 3m buffer of thick grass is an excellent buffer.</p> <p>The decision of where the fence line is built needs to be based on operational and site lead factors, decided by the landowner. Where a farm lane or track exists a 1m buffer is a real option. Wetlands are the buffer. They provide the physical filtering. The fences around a wet land should be built where practical.</p> <p>#Stock Exclusion from highly erodible land.</p> <p>This should be stopped. Fencing streams and wetlands is the priority. Unless we are going to close all unsealed roads, it would just be a punitive action against rural landowners.</p> <p># Time frame for stock exclusion rules. (streams and wetlands)</p> <p>Realistically 26 years. 2050. This is achievable. You cannot magically reverse the impacts of 800 years of human occupation in 5 to 10 years. You cannot erase people. There are more people living in Northland than ever before. You cannot magically make land owners financially able to pay for fencing. The effects of our way of life are ours to deal with , and the reality that means for some of us it will not happen in our life time. That's the reality. We can move in the right direction, but the positive outcomes will take time.</p> <p>Tangata Whenua and kaitiaki over water.</p> <p>Tangata Whenua can lead by example on their own lands. Set a good example. For me , water is part of a natural process, and as a land owner I am responsible for respecting what water provides us. That</p>

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		<p>means protecting streams and wetlands. I want to be able to follow my own beliefs. I do not want more third party involvement or interference from anybody, for our property. All rate payers should have equal say and influence.</p> <p># The key to effective policy is that it is enforceable. To that end any policy needs to be clear , focused and able to be enforced in a balanced and consistent way. The draft plan does not represent that. Its generalist, ideological, and strays from being objective.</p> <p>Farmers are going to have to produce "Farm Plans" The detail relevant to each properties management can be done there.</p> <p>NRC is also in the position of not being able to produce then enforce policy non prejudicially. Currently millions of dollars of unpaid rates are written off by NDC and NRC . The properties/landowners in the majority of cases don't pay rates because they know that NRC will not take further action. This same approach will be adopted with enforcing any new policies. The properties not paying rates will be in the "to hard basket". The landowners who respect the rule of law, and actually pay the wages of the public servants will also be the first to have rules imposed and enforced. The depressing reality is that the way to solve that, from a staff point of view, will be to fund work on non rate paying properties. I say that from experience.</p> <p>I support fencing off streams/rivers, and wetlands . But in a realistic way, and realistic time frame.</p>
Catherine Mackenzie	6 - 8	<p>The changes being proposed are "nice to have's" but in reality are unworkable. Just like the SNA maps the Erodible Land mapping covers half of Northland.</p> <p>Many farmers have been bashed by yourself and the last Government and then bashed again by the current economic climate. You seem to believe that by telling them in advance farmers will miraculously be able to pull tens of thousands of dollars per annum out of thin air.</p> <p>Farmers are price takers, they can't just whack up the rates when they need more money and all the rules and regulations you are trying to impose on them are making it very difficult to make a living. (no six figure office jobs here). Shurly your policy makers understand the physical reality and realistic cost of fencing off long tracts of streams, wetlands, and steep areas of terrain. It would mean huge costs for even electric fencing let alone seven wire sheep fencing.</p> <p>In my opinion the result of this proposal would be the last nail in the coffin for many farmers and have a negative effect on Northlands economy.</p>
Angus MacLean	5 - 8	<p>Te Mana O Te Wai is racism.</p> <p>There are more people than just tangata whenua in Northland.</p>
Ross & Wendy Magon	1, 2, 6, 7 & 9	<p>years ago we fenced off all our creeks and bush land and put in water reticulation. To protect the native environment. Stock exclusion from highly erodible land . According to your map everything on our farm 25 degrees or more is trees. This is not good enough. NRC needs to visit every farm and access them! Sorry we don't agree with stock exclusion. Planting pines is also an environmental disaster. Waterways. Fencing water ways at three meters is fine. Any more is absurd! Alot of erosion is caused by flooding! Water allocation. NRC must allow for full allocation of water for Stock and Must be available all year round. We don't agree to 20% being allocated for maraes, Maori land . Every New Zealander should be able to have free use to the water. Environmental plans are suppose to cover all this. So how does NRC think they can have their own plans. As far as all farmers can see NRC has gone well over the national legislation. Nothing should change. And should stay the same. NRC needs to take a look at the impact on farmers. Is NRC going to pay all the costs for each farm?</p>
Mahimaru Marae (Michelle Anderson)	2, 3, 6, 7 & 12	<p>Feedback from Mahimaru Marae</p> <p>Landowners in Awanui and Ngāi Takoto lands may face financial hardship complying with some of the proposed rule changes. Such as:</p> <ul style="list-style-type: none"> <li>- Requirements to fence off waterways;</li> <li>- Cost of providing native vegetation to prevent weeds and pests;</li> <li>- Loss of productive land for some that are required to change the way they use their whenua.</li> </ul> <p>Council should:</p>

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		<ul style="list-style-type: none"> <li>- Provide financial assistance for fencing and vegetation such as grants or subsidies;</li> <li>- Targeted erosion mitigation assistance such as technical support, resources, access to erosion mitigation funding or support on-farm investments in erosion control infrastructure;</li> <li>- Capacity-building programs to landowners to enhance their understanding of erosion risk and effective mitigation strategies. Council can support sustainable land practices while minimising the need for regulatory intervention;</li> <li>- Extend submissions, consult further given the additional time you now have for this (per below).</li> </ul> <p><a href="https://environment.govt.nz/news/rm-reform-update-march-2024/#national-policy-statement-for-freshwater-management-and-other-regulations">https://environment.govt.nz/news/rm-reform-update-march-2024/#national-policy-statement-for-freshwater-management-and-other-regulations</a></p> <p><b>National Policy Statement for Freshwater Management and other regulations</b></p> <p>The Government will review and replace the National Policy Statement for Freshwater Management 2020. This process is expected to take 18–24-months and will include consultation.</p> <p>In the interim, the Government wants to address concerns about how the hierarchy of obligations contained in the Te Mana o te Wai provisions of the NPS-FM is being applied to individual resource consent applications and decisions.</p> <ul style="list-style-type: none"> <li>• Individual resource consent applicants are being asked to demonstrate how their activity adheres to the hierarchy of obligations of Te Mana o te Wai within the NPS-FM</li> <li>• Consent authorities are applying the hierarchy of obligations in their consent decision making.</li> </ul> <p>These changes are expected to be introduced as part of a bill amending the RMA.</p> <p>Government has already extended the deadline for councils to notify freshwater plans and policy statements by three years until the <b>end of 2027</b>.</p>
Jonah Marinovich	1 - 12	<p>General comments</p> <ol style="list-style-type: none"> <li>1. Firstly, I would like commend NRC on reaching this draft stage of plan development. The framework you have developed provides a solid base for amendment to effectively address water quality issues we have in Te Tai Tokerau, not just to give effect to the NPS-FM (2020) and Te Mana o te Wai. This plan change represents an aspiration to ensure our tamariki, mokopuna, and future generations can swim in our rives and access safe drinking water, while providing for themselves and any options for how they live with our rivers, lakes, wetlands, and land in the future.</li> <li>2. Water quality in our lakes, rivers, and estuaries is continuing to deteriorate.</li> <li>3. I am generally supportive of the draft plan change, particularly the incorporation of objectives and policies relating to Te Mana o te Wai (such as Objective 3.16 Te Mana me te Mauri o te Wai). I strongly support the retention of Te Mana o te Wai in the plan.</li> <li>4. My primary interest in freshwater in Northland is as a resident. I have only lived in Northland since 2021, however since moving here have been shocked at the state of Northland's waterways. I would like to live in an area where water and the ecosystems associated with it are respected for their own sake, as well as the value they have for the people who live in the area. I also value the coastal areas where these waterways flow to, which are obvious 'receiving environments' for water from upstream in the catchment.</li> <li>5. The water bodies and coastal environments I interact most with and am most concerned with are: a. Lake Omapere; b. Utakura river; c. Waitangi river; d. Punakitere river; e. Mangatoa stream; f. Omanaia river</li> <li>6. Primarily I value the water quality values of these areas for contact recreation such as swimming, kayaking, and ideally to be drinkable. Ecosystem health is broadly a proxy for water quality. Where there are healthy native ecosystems around waterways and their tributaries, the water is healthy. Where vegetation has been removed allowing water temperatures to rise, soil erosion to accelerate, and runoff of agricultural outputs, water quality suffers with algal blooms and e coli.</li> <li>7. Beyond the intrinsic relationship between our native ecosystems and water quality, it is my belief that our native ecosystems are taonga, and that they exist for their own sake. As such they need to be protected so that they are available for the enjoyment and spiritual enrichment of all New Zealanders. We proudly promote ourselves to the world as a 'clean green' nation. It would be great if our attitudes towards water reflect this image.</li> <li>8. I would like to see Northland Regional Council do as much as it can to protect and restore Te Mana o</li> </ol>

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		<p>te Wai and ecosystem health in these areas, and across the region generally.</p> <p>Key Issues:</p> <p>9. Key issues for me across Northland are water quality (particularly e. coli, sediment, algal growth/periphyton, potential toxic waste from mining activities, and ecosystem health); amenity values/drinking water; contact recreation; and natural form and character.</p> <p>In particular Lake Ōmāpere, and the Utakura river which flows out of it are of interest to me. Lake Ōmāpere suffers from extreme algal blooms of toxic cyanobacteria for much of the year. As far as I know this is due to historical lowering of the lake level, farm runoff from the land surrounding the lake, and the loss of wetlands around the lake which would have helped keep the water clean. The Utakura river, which takes the main outflow from the lake suffers from the same degradation of water. As a Kaikohe resident, it is obvious that if Lake Ōmāpere and the Utakura river were swimmable, it would be a huge benefit to the town. I imagine if the lake were safe to swim in, then it could be used for water sports such as waka ama, which we currently have to drive to either the Hokianga harbour, or Bay of Islands to participate in. Lake Ōmāpere and the Utakura river are also a feature of Te Pou Herenga cycle trail, when one rides from Kaikohe to Hōreke. It makes me hesitant to promote this section of the cycle trail when I know that the river which flows beside it is toxic. The flipside of this situation is that it would be great to be able to tell people that they could stop for a swim whilst enjoying beautiful ride from the volcanic highlands around Kaikohe/Okaihau, down to the Hōreke on the coast.</p> <p>As such I think it is worth taking strong measures to restore the health of Lake Ōmāpere, and therefore also the Utakura river.</p> <p>10. I support having strong regulatory measures in the plan to address these issues.</p> <p>11. To address freshwater issues, I would like to see Northland Regional Council:</p> <ul style="list-style-type: none"> <li>a. Protect and provide for ecosystem health by <ul style="list-style-type: none"> <li>i. Including clear target attribute states for nitrogen and phosphorus, and any heavy metals that might be part of toxic waste from mining proposals, that protect ecosystem health (not just 'toxicity'); and connecting these to limits on resource use. It appears these are missing from the draft plan and this gap needs to be addressed.</li> <li>ii. Providing for Te Mana o te Wai throughout the plan.</li> </ul> </li> <li>b. Protecting the health of groundwater for human drinking and ecosystem health by: <ul style="list-style-type: none"> <li>i. Including a target attribute state for nitrate-nitrogen in groundwater with a target of less than 1.0 mg/L nitrate-nitrogen.</li> </ul> </li> <li>c. Protecting erosion prone land through: <ul style="list-style-type: none"> <li>i. new rules limiting vegetation clearance, land preparation and earthworks in areas of high erosion risk, with tighter controls applied to these activities in areas with severe erosion risk.</li> <li>ii. new rules requiring stock to be excluded from areas of both high and severe erosion risk.</li> </ul> </li> <li>d. Keeping stock out of waterways with <ul style="list-style-type: none"> <li>i. rules for streams in steeper areas,</li> <li>ii. large enough setbacks (&gt;10m) to provide enough space for riparian vegetation to establish around waterways, to allow rivers and streams to naturally adjust through erosion over time, and to provide space for rivers to dissipate flood energy without eroding fences or causing problems downstream</li> </ul> </li> <li>e. Eliminating and reducing discharges by: <ul style="list-style-type: none"> <li>i. Requiring consent for dairy effluent discharges to land</li> <li>ii. Prohibiting new farm dairy effluent discharge to water and introducing stricter requirements for renewal of existing consents.</li> <li>iii. Prohibiting new wastewater treatment plant discharges to water and introducing stricter requirements for renewal of existing consents.</li> <li>iv. Prohibiting domestic wastewater discharges to waterways</li> <li>v. Prohibiting any toxic waste from mining activities into waterways above and below ground</li> </ul> </li> <li>f. Protecting wetlands by <ul style="list-style-type: none"> <li>i. Prohibiting wetland drainage and clearance</li> <li>ii. Requiring stock exclusion from wetlands</li> <li>iii. Adding policies to the plan that would encourage wetland restoration</li> <li>iv. Mapping and monitoring wetland extent</li> <li>v. Introducing a measure of wetland condition using a tool like the wetland condition index (as recommended by the Government's Science and Technical Advisory Group on the NPS-FM)</li> </ul> </li> </ul>

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		<p>g. Controlling exotic forestry by:</p> <ul style="list-style-type: none"> <li>i. Requiring larger setbacks for exotic carbon and plantation forestry from waterways.</li> <li>ii. Requiring resource consent for plantation forestry and exotic carbon forests in high-value dune lake catchments.</li> <li>iii. Prohibiting clear-felling of forestry in high-risk or steep areas</li> </ul> <p>h. Expanding requirements for assessing impacts on cultural values by</p> <ul style="list-style-type: none"> <li>i. Adding requirements for resource consent applicants to assess cultural impacts that affect tāngata whenua values for freshwater.</li> </ul> <p>i. Phasing out and preventing over-allocation of water by</p> <ul style="list-style-type: none"> <li>i. Using short-term consents of &lt; 10 years for all water takes, unless for municipal/papakāinga/marae supply</li> <li>ii. Prohibiting water takes above environmental flows and levels</li> <li>iii. Ensuring consent expiration dates are aligned across a catchment</li> <li>iv. Setting aside a portion of unallocated water (provided it is within environmental limits) to be used for environmental enhancement.</li> </ul> <p>j. Addressing nutrient pollution from agriculture by</p> <ul style="list-style-type: none"> <li>i. Having a robust allocation system for nutrient leaching, which should include things like limits on fertiliser use and stocking rates in degraded catchments.</li> <li>k. Promoting nature-based solutions by</li> <li>i. Including policy prioritises nature-based solutions over engineered solutions when making decisions on flood protection.</li> <li>ii. Including policy protecting the ability of existing wetlands, native forests, and rivers/floodplains to naturally mitigate extreme weather</li> </ul> <p>l. Improving the management of the natural character and habitat of our rivers by</p> <ul style="list-style-type: none"> <li>i. Increasing the regulation of activities in the beds of rivers, such as gravel extraction</li> <li>ii. Requiring regular monitoring and reporting of natural character and physical habitat in rivers</li> <li>iii. Including target attribute states for natural character and physical habitat in rivers</li> </ul> <p>m. Protecting coastal water and water in 'receiving environments' by:</p> <ul style="list-style-type: none"> <li>i. Protecting and restoring catchments upstream to improve water quality</li> <li>ii. Including target attributes for water quality in estuaries and coastal areas</li> </ul> <p>12. Thankyou for the opportunity to make this submission. I look forward to the progression of the plan to notification and the improvements in water quality it can bring when implemented. Ngā Mihini</p>
Maiki Marks		<p>Ka ora te wai, Ka ora te tangata, Ka ora nga mea katoa</p> <p>I have submitted to NRC Plans on water since 1993. To address freshwater issues I would like Northland Regional Council to -</p> <p><b>Protect and provide ecosystem health by:</b></p> <p>providing for Te Mana o te Wai throughout the Plan</p> <p>including clear target attribute states for nitrogen and phosphorus that protect ecosystem health (not just 'toxicity'); and connecting these to limits on resource use. It appears these are missing from the draft plan and this gap needs to be addressed.</p> <p><b>Protecting the health of groundwater for human drinking and ecosystem health by:</b></p> <p>Including a target attribute state for nitrate-nitrogen in groundwater with a target of less than 1.0mg/L nitrate-nitrogen.</p> <p>Protecting erosion prone land through:</p> <p>new rules limiting vegetation clearance, land preparation and earthworks in areas of high erosion risk, with tighter controls applied to these activities in areas with severe erosion risk.</p> <p>New rules requiring stock to be excluded from areas of both high and severe erosion risk</p> <p><b>Keeping stock out of waterways with:</b></p> <p>rules for streams in steeper areas,</p>

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		<p>large enough setbacks – 10m to provide enough space for riparian vegetation to establish around waterways, to allow rivers and streams to naturally adjust through erosion over time, and to provide space for rivers to dissipate flood energy without eroding fences or causing problems downstream.</p> <p><b>Eliminating and reducing discharges by:</b></p> <p>Requiring consent for dairy effluent discharges to land</p> <p>Prohibiting new farm effluent discharge to water and introducing stricter requirements for renewal of existing consents.</p> <p>Prohibiting new wastewater treatment plant discharges to water and introducing stricter requirements for renewal of existing consents.</p> <p>Prohibiting domestic wastewater discharges to waterways.</p> <p><b>Protecting wetlands by:</b></p> <p>Prohibiting wetland drainage and clearance</p> <p>Requiring stock exclusion from wetlands</p> <p>Adding policies to the Plan that would encourage wetland restoration</p> <p>Mapping and monitoring wetland extent</p> <p>Introducing a measure of wetland condition using a tool like the wetland condition index (as recommended by the Government's Science and Technical Advisory Group on the NPS-FM)</p> <p><b>Controlling exotic forestry by:</b></p> <p>Requiring larger setbacks for exotic carbon and plantation forestry from waterways.</p> <p>Requiring resource consent for plantation forestry and exotic carbon forests in high-value dune lake catchments.</p> <p>Prohibiting clear-felling of forestry in high-risk or steep areas.</p> <p><b>Expanding requirements for assessing impacts on cultural values by:</b></p> <p>Adding requirements for resource consent applicants to assess cultural impacts that affect tangata whenua values for freshwater</p> <p><b>Phasing out and preventing over-allocation of water by:</b></p> <p>Using short-term consents of 10 years for all water takes, unless for marae/municipal supply.</p> <p>Prohibiting water takes above environmental flows and levels</p> <p>Ensuring consent expiration dates are aligned across a catchment</p> <p>Setting aside a portion of unallocated water (provided it is within environmental limits) to be used for environmental enhancement.</p> <p><b>Addressing nutrient pollution from agriculture by:</b></p> <p>Having a robust allocation system for nutrient leaching, which should include things like limits on fertiliser use and stocking rates in degraded catchments.</p> <p><b>Promoting nature-based solutions by:</b></p> <p>Including policy that provides for the prioritisation of nature-based solutions over engineered solutions when making decisions on flood protection.</p> <p>Including policy protecting the ability of existing wetlands, forests, and rivers/floodplains to naturally mitigate extreme weather.</p> <p><b>Improving the management of the natural character and habitat of our rivers by:</b></p> <p>Increasing the regulation of activities in the beds of rivers, such as gravel extraction</p> <p>Requiring regular monitoring and reporting of natural character and physical habitat in rivers</p> <p>Including target attribute states for natural character and physical habitat in rivers</p> <p><b>Protecting coastal water and water in 'receiving environments' by:</b></p> <p>Protecting and restoring upstream water quality</p> <p>Including target attributes for water quality in estuaries and coastal areas</p>

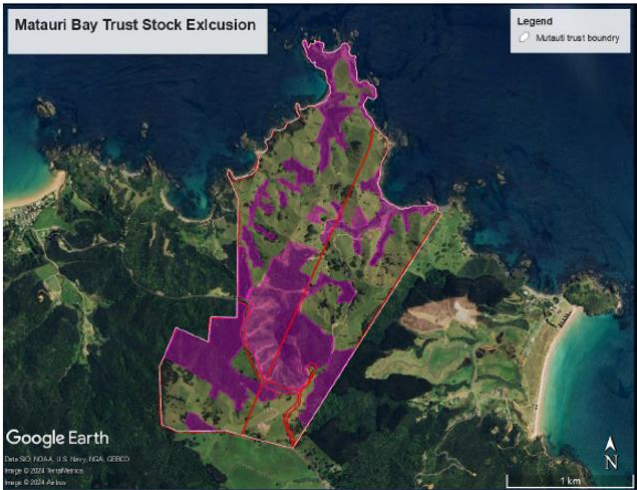
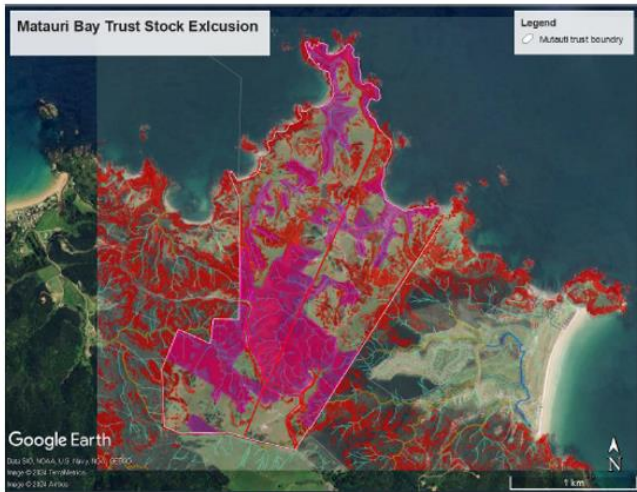
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Ryan Marsich	2, 6, - 8	<p><b><u>Stock Exclusion</u></b></p> <p>This submission is made in relation to the “<i>Stock Exclusion</i>” discussion paper and possible changes issued as part of the draft Freshwater Plan Change.</p> <p>In summary, this submission opposes the proposed changes to the stock exclusion rules. The proposed changes come nowhere close to striking the right “balance” between environmental protection and economic sustainability. Not only are they impractical, but they will also adversely impact farmers and rural landowners economically to the extent farming will become unfeasible on many rural properties in Northland.</p> <p>In particular, the proposed extension of stock exclusion rules to “<i>highly erodible land</i>” will result in farmers being prevented from farming on large tracts of presently productive land, permanently reducing production and earning potential on that land and essentially putting farmers operating on hill country “out of business”. Further, the proposed changes will require considerable fencing work and a significant cost outlay that farmers and rural landowners will struggle to meet, notwithstanding any “lead in” time that might be allowed for work to be carried out to ensure land is compliant with the new rules (if imposed).</p> <p>On this point, the discussion paper provides cost “<i>estimates</i>” for implementing the proposed changes, expressed (in most cases) over a 30-year period, however this misrepresents the nature of these costs and how they will be incurred. Most, if not all, of these costs will be incurred in the years immediately following the imposition of the new rules, which will place significant financial strain on farmers and rural landowners. For example, with respect to the proposed stock exclusion from land with high erosion risk, it is estimated the extra cost for an average sheep and beef farm would be \$16,500 to \$24,700 per year over 30 years, however “<i>70% to 75% of the costs will be in the first five years</i>”. Accordingly, the discussion paper appears to suggest that the cost to farmers and rural landowners in this instance would be over \$550,000 in the five years following imposition of the rule.</p> <p>In addition, the discussion paper analyses costs of implementing each proposed rule discussed under each of the separate question headings (i.e. set-backs, stock exclusion on land with erosion risk, and stock exclusion for wetlands), however it does not appear to assess the culminative cost of implementing these rule changes if they are all imposed. For a farm that has waterways, land with high erosion risk and wetlands, which would include a large number of farms in Northland, the total cost of implementing these rule changes would be prohibitive.</p> <p>Farmers and rural landowners cannot be expected to bear such enormous costs. It is for these and other reasons that the proposed changes cannot proceed as they are presently drafted.</p> <p>For ease of reference, this submission will respond to each of the five “<i>Questions</i>” put forward in the “<i>Stock Exclusion</i>” discussion paper sequentially.</p> <p><b><u>Question 1: How far away from waterways should stock be kept?</u></b></p> <p>The introduction of a “blanket” set-back is opposed, however if one were imposed the set-back distance should be as little as possible. As noted in the discussion paper, even a 3-metre set-back would cost a non-dairy farm up to \$8,200 per year. This cost estimate is comparatively light and in reality, rural landowners will likely end up paying significantly more in fencing costs to ensure their property is compliant. As stated above, most of these costs will be incurred in the years immediately following the imposition of such a rule change, which will place significant financial strain on landowners.</p> <p>The discussion paper also does not take into account the impact that such a set-back rule will have in terms of the reduction of productive farmland, including how much land will be “excluded” from farming because of the imposition of a 3-metre, 5-metre or 10-metre set-back. This will have an adverse impact on food or milk production and the overall profitability of farms directly affected by a new set-back rule, particularly if that rule requires a set-back of 5 or 10 metres. The imposition of a blanket set-back rule of any of the distances discussed is premature without a full analysis of the economic ramifications on farms directly affected by a new set-back rule.</p> <p><b><u>Question 2: Should stock exclusion rules apply to highly erodible land?</u></b></p> <p>Stock exclusion rules should <i>not</i> apply to highly erodible land. As stated above, to apply stock exclusion rules to such land would be impractical and detrimentally affect many farmers who farm on hill country.</p>

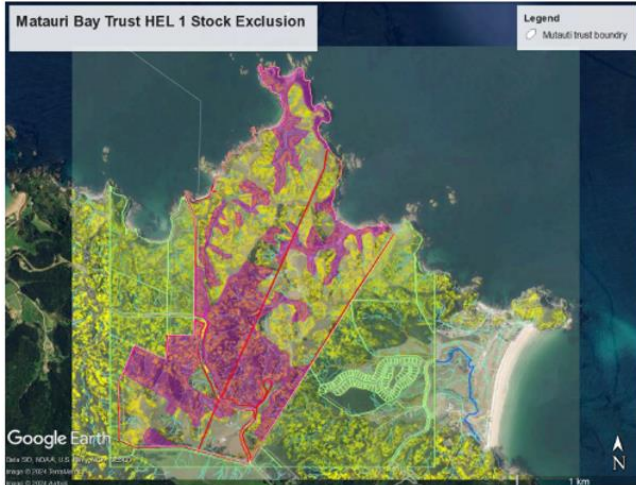
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		<p>The discussion paper does not take into account the economic effect the extension of stock exclusion rules to highly erodible land will have on farmers and farm businesses more generally, including the number of farmers and farm businesses that will effectively cease to operate as a result of the proposed changes. As stated above, the discussion paper appears to suggest that landowners directly affected by the proposed changes will incur significant costs to ensure their property is compliant with the proposed stock exclusion on land with high erosion risk, spending possibly over \$550,000 in the first five years immediately following the imposition of the new rule.</p> <p>Most landowners will simply be unable to afford these costs. The suggestion that the enormous costs involved in stock exclusion on land with high and severe erosion risk can be “off-set” by planting land in permanent forest and claiming carbon credits is speculative and wishful thinking. This does not factor, among other things, the cost outlay required from landowners to plant trees and assumes that all affected land will be appropriate for planting. This also assumes that carbon revenue streams (which are variable) will be sufficiently high enough to off-set the costs of complying with the new stock exclusion rule, which cannot be guaranteed. In any event, many owners of steep land prone to erosion have retired (or are in the process of retiring) those areas on their properties with high erosion risk and repurposed those areas including, where appropriate, planting those areas in trees. This progressive shift in grazing retirement and land repurposing with respect to land with high erosion risk that has, to date, largely occurred organically over time, should be encouraged as opposed the imposition of rules that would essentially require immediate and significant expenditure that most landowners would struggle to afford (if at all).</p> <p>The discussion paper also does not appear to take into account the reduction in food production and the impact this will have on overall profitability as a direct result of stock being excluded from such land which as noted in the discussion paper, comprises about 18.8% of total land in the region.</p> <p>The direct economic impact of these proposed changes strongly weighs against stock exclusion rules being applied to highly erodible land as proposed.</p> <p><b><u>Question 3: What should the rules be for excluding stock from wetlands?</u></b></p> <p>The phased approach requiring beef, dairy support cattle and deer to be excluded from hill country wetlands greater than 2000 metres in the interim and from all wetlands larger than 500 metres in the longer term is opposed. Again, the proposed changes overlook the enormous adverse economic impact on farmers and rural landowners in terms of immediate and ongoing costs (i.e. the fencing costs that would be required to comply with such change), which weighs against the rule change proposed.</p> <p><b><u>Question 4: Should stock exclusion be extended to apply to other animals?</u></b></p> <p>No, the stock exclusion rules should not be extended to apply to other animals. As noted in the discussion paper, “the costs would be significant” in extending the stock exclusion rules to other animals. This weighs against the rule change proposed.</p> <p><b><u>Question 5: What timeframes are feasible for any new stock exclusion rules?</u></b></p> <p>If changes to stock exclusion rules are made as proposed then there should an ample “lead-in” time for farmers and rural landowners to comply with those changes of at least 10 years, given the significant costs that would be involved in ensuring compliance with the changed rules.</p>
Matauri Trustee Ltd (Sean Alexander)	6 & 7	<p>I am writing on behalf of Matauri Trustee Limited as trustee of the Matauri Trust concerning the Draft Freshwater Plan Change and wish to advise that we oppose portions of the proposed plan. Our primary concern originates from Patai 2 involving stock exclusion rules on highly erodible land. Throughout my time as a rural professional, I have conducted extensive research into trends in freshwater quality in the Kaipara Moana Catchment and how this can be improved by policy implementation. Through review of the draft freshwater plan change, we have some key concerns regarding the generation and implementation of the draft specific to the Matauri Trust’s agricultural property located in Matauri Bay. At a high level the farm is running approximately 750 - 800 ewes plus 200 replacement hoggets, along with 80 - 100 trading cattle. Across 330 ha this is a comparatively low stocking rate.</p> <p>A large proportion of the property has stock exclusion in place as marginal land has proven to be unproductive over time and is better to be retired into native bush or utilised as production forestry. Map 1 shows the property boundaries and indicates the areas in which stock are already excluded in pink.</p>

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		 <p><i>Map 1: Stock excluded areas of the property</i></p> <p>I understand that the database developed by Duncan Kervell using LiDAR to a one-meter scale is a valuable tool that is able to identify areas that are likely to be of high risk of erosion. However, we do not believe that this is an effective tool to implement a blanket policy across the region. A site-specific approach that allows for a wide range of mitigation implementation options, as well as expanding on existing mitigation practises that correspond to the location's own unique characteristics and erosion risks would, in our view, be much more effective.</p> <p>To support the point that utilising a site-specific approach through farm management plans is the better option, I would like to highlight that Matauri Trust has well established wetlands, swamps, and a lake across the property. These all are excluded from stock and serve a valuable purpose for the property. They provide habitat for birdlife, and other species, as well as filter out sediment through vegetation, filtration, and sediment trapping. This is done through reduced flow allowing suspended sediments to settle out and accumulate within the wetland. These wetlands and lakes on the property prevent sediment from reaching the ocean. This is an identified mitigation factor that benefits the environmental sustainability of the property without sacrificing economic viability. Under a farm management plan approach for sediment erosion reduction these factors could be identified, whilst under blanket policy implementation these factors of great importance to the property are neglected. This is not just the case for Matauri Trust as many other properties in the region have mitigation methods implemented.</p>  <p><i>Map 2: HEL2 Areas and Existing Stock Exclusion</i></p>

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		<p>Map 2 identifies land that is over 35 degrees and is classed as HEL2, the majority of areas in red (HEL2) are already excluded from stock grazing. However, the areas of HEL that are still in pastoral land use flow through a wetland. These wetlands naturally trap sediment and prevent suspended sediment from entering the ocean.</p>  <p><i>Map 3: HEL1 Areas and Existing Stock Exclusion</i></p> <p>Map 3 identifies land that is between 25 degrees and 35 degrees (HEL1). Illustrated in the map, a significant portion of this land is already excluded from stock, however HEL1 covers almost all of the pastoral area on the property. The resulting outcome of stock exclusion from highly erodible land would be both moderate and tightly controlled resource consents over the majority of the property. These resource consents would be in place without consideration of the already established mitigation approaches. This will result in significant economic losses that may make farming unsustainable. The only cost mitigation strategy provided by the Northland regional council is “by planting the land in permanent forest and claiming the carbon credits”. This would see all agricultural production activities on the property stop and would likely have a similar effect for a large number of properties affected under the proposed policy. Based on the research by Malcolm Green and Adam Daigneault in 2018 (which has been cited on the NRC website) the Kaipara Harbour sediment mitigation study found that stock exclusion rules would reduce total catchment sediment load by 13% at a cost of \$118 per tonne per year, this cost is primarily derived from a loss of revenue in agricultural operations. Farm management plans on highly erodible land are shown to have a lesser total mitigation cost while decreasing total catchment sediment load by a larger quantity. This can be achieved by targeting highly erodible land on a case-by-case basis to take into account all factors of erosion in Northland and generate a plan to mitigate based on its unique circumstances and unique risks on that certain property. This gives landowners the opportunity to utilise a large toolbox of erosion mitigation strategies.</p> <p>Implementing this policy will have a severely negative affect on the profitability, mental wellbeing, and quality of life of sheep and beef farmers affected and greatly reduce the longevity of sheep and beef farming in Northland. This is why we do not support the proposed blanket policy approach and would like to instead express our support for a farm environment management plan approach to achieve improved freshwater outcomes in the Northland region. I would also like to extend my gratitude towards everyone involved for considering this submission when reviewing the Draft Freshwater Plan Change. If you require any clarification or further communication, feel free to get in touch with me with the provided details.</p>
Penny May	7	<p>I am disgusted by this plan. The majority of Northland farms have farmland greater than 25°. This will ruin farmers! You are going to make farms worthless and financially ruin farmers! Have you consulted Fonterra? As this will severely impact them and the consumer too. Also, planting in pine trees is the most stupid idea I have ever heard. Pine trees have shallow root systems therefore making land less stable. Duh!</p>

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Fraser McBeth	1 – 7, 9 & 10	<p>1. Erodible land: Fencing off highly erodible land on my farm has already been done. My concern is the areas of erodible land marked in yellow on the map. These areas are in a place where taking hectares off our productive land is going to cost us in loss of income and being able to service the mortgage and keep operating.</p> <p>2. I am putting a massive amount of resources into keeping the waterways on my farm free from stock and maintained with fencing. This can be taken out several times a year with floods.</p> <p>3. The floods this season and last season have been extremely challenging and caused loss of production and income with fences being taken out and re-grassing. The costs have been in the tens of thousands. We should not have to pay consents or get iwi consultation to let us run our farms with the water required. I am happy to have stock excluded to protect our waterways and reduced e coli contamination as well as sediment loss. But it has to be understood what happens with invasive weeds that we can not control now. We need systems that are manageable and sustainable.</p> <p>4. You can't charge us for water that comes from the sky. I don't agree with having to have consents granted through the tangata whenua iwi consultation process proposal. This is going to divide communities and cause unrest, not to mention stop us providing our business with water for our stock and producing milk. It has to be fair and equitable.</p> <p>5. The water monitors are costing us a fortune. We shouldn't be paying for this. We conserve water.</p> <p>6. I look after my soil and pasture on my farm to conserve it for future generations and so the farm can be farmed with looking after the environment so our water and land is sustainable.</p> <p>7. Consent to discharge effluent to land is going to put another cost on to farmers. We are working hard to manage and increase storage for effluent as a whole in Northland. This is a huge cost. Consent to discharge effluent to ground and get consultation from iwi to do so will stop farmers being able to get their ponds kept at a compliant level.</p> <p>In summary, everything implemented has to be sustainable and profitable to keep the New Zealand and Northland economy going. The goal posts have to stop being moved. We need to have certainty and collaboration and to be heard. If not there will be a mass exodus of farmers from the industry. This is a major concern.</p> <p>I'm fifth generation on the farm. I can't honestly encourage the next generation to go farming as it has become too bound by others telling us how to run our own business. It has become too onerous.</p>
Kees McCahon	1, 2, 4, 6 & 7	<p>Exotic weeds dominate large stretches of riparian habitat in Northland, with biotic and abiotic impacts on the freshwater system. Native forest cover is preferred by most native species. Forest cover or lack of, can have a range of diverse effects on stream habitat. Temperature fluctuations and sun exposure are strongly regulated by overhead canopy cover. Stream channel and bank stability, provision of in-stream debris and terrestrial food availability for fish are all increased with intact riparian margins. Exotic plantations and pastoral landscapes lack the structural heterogeneity of native forest. Non-indigenous forests tend to have limited lifespans due to harvesting, with subsequent repercussions in stream turbidity, sedimentation, and periodic loss of riparian tree cover. I thereby support the idea of restricting exotic plantations nearby freshwater water bodies.</p> <p>Furthermore, more rules surrounding stock exclusion from water bodies is essential to the protection and conservation of freshwater in Te Tai Tokerau. I support the idea of a wider fenced setback of either 7 or 10 metres. This will enable more bank stability, reducing erosion and stream turbidity. It is also important in that it allows more space for a wider riparian margin with benefits for both freshwater health and farming, as stock can be provided with shade as temperature and drought extremes become more frequent and more fierce under coming climate predictions.</p> <p>I support the protection of highly erodible land in Te Tai Tokerau. I believe this is well overdue and is absolutely essential to freshwater protection. While I understand there will be a lot of resistance from landowners on this part of the proposal, I hope NRC will not back down from implementing the protection of erodible land. There may be short term economic benefits in continuing to use such land however, in the long-term I believe the costs of not protecting such land are far too severe and far too significant to not do so. Sedimentation from erodible land negatively impacts the drinkability of our waterways for communities, habitat for native fish and the ability for humans to enjoy the outdoors. Freshwater ecosystems tend to be continuous, stretching from the mountain to the sea. Impacts felt</p>

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		<p>upstream affect all parts of a waterbody from that point downstream - even the oceans and beaches which we in Te Tai Tokerau treasure and enjoy. It does not matter how much restoration efforts are made in downstream/lowland habitat if the headwaters of a waterbody are not protected. The headwaters of our streams are typically within steep and erodible land. Therefore the protection of this type of land is an essential step in restoring and conserving freshwater habitat from the mountain to the sea. Retiring erodible land from forestry and agricultural practices will have positive flow on effects all the way downstream to our precious moana.</p> <p>The failure to protect and restore freshwater habitat and fauna threatens all ecological, cultural, and economic values of Aotearoa New Zealand. Almost all New Zealand rivers running through urban and farming areas (95-99%) carry pollution above water quality guidelines, while most of the nation's wetlands (90%) have been drained. Freshwater ecosystems provide irreplaceable ecosystem services for human society and nature though current declines in freshwater biodiversity and water health threaten the availability of these services for future generations. Policy change around increased fence setbacks, protection of erodible land and the restriction of exotic forestry, as outlined in the Northland freshwater plan are absolutely essential for healthy freshwater systems to exist in the future.</p>
Aaron McConnachie	1 – 3, 5 – 8 & 10	<p>If we are going to fence off water by 10 meters who's going to cover the costs of maintaining the land and will it come off of the rates bill.</p> <p>If the 25-degree slope rule takes place then up to 50% of our farm would be impacted.</p>
Flynn McGregor	1 – 3, 6, 11 & 12	Pine tree plantation causes a lot of damage to waterways and poisons the soil they grow in. I think they have to be planted in areas away from freshwater and in soils that we as people can not harvest good food crops from. Also planting trees along riversides that help improve water and fresh water species living in the streams and lakes
Alasdair McKay	6 - 8	<p>1. Riparian setback. 3m to be used as a minimum. In most cases it will be closer to 5-10m from the water depending on steepness and size of the bank. 10m setback would be too expensive regarding loss of economic potential and cost of riparian planting and weed control. If farmers are retiring/donating this land then planting and weed control should be done and paid for by NRC/Community.</p> <p>Believe an averaging approach should be used as in different parts of the river different set backs are beneficial.</p> <p>Needs to different rules for rivers and drains that are empty for large periods. For example our peat block has multiple shallow drains that are empty for 2/3rds of the year. They are all fenced but if setbacks increased there would be a massive loss of economic farm land.</p> <p>2. Stock Exclusion from highly erodible land. Stock exclusion on severe risk land is reasonable, provided small sections of otherwise compliant paddocks are excluded.( Land over 35 degrees where you can't get tractors on them safely)</p> <p>Again if large areas are to be retired by the farmer then fencing, planting and weed control should be covered for by funding from NRC and Community.</p> <p>Would require a decent 10 year (minimum) time frame for new rules to allow planning and funding applications to be sorted)</p> <p>I would like the opportunity to speak at any hearing.</p>
Chris & Diane McKay	2, 6 & 7	We think if these laws come into play it will completely destroy farming in Northland. Not only will farmers be destroyed but it will have a follow on affect to all Northland communities. Fonterra suppliers have already fenced off all waterways and increasing the distance of that is irrelevant...it will make no difference especially if riparian plantings have already occurred. If we are forced to stop farming land of a certain gradient it will then revert to noxious weeds including gorse, ragwort, blackberry, riddled with possums and other pests. We think it would be devastating to see currently productive land revert to scrub at the hands of some ill informed naive people out of touch with reality.
Ashley McLaughlin	1, 2, 6 - 8	The changes regarding the fencing of waterways and excluding stock off land over a certain gradient would mean the end of farming to the majority of hill country farming in Northland. Adding these

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		<p>restrictions and the costs it would incur to implement them will mean businesses and families being forced off their land.</p> <p>The economic fallout from this would send the region into a 3rd world economy. I fenced my waterways and bush blocks off at my own expense over 25 years ago and have been given no credit for it. I don't over stock and am an exemplary caretaker of my land, always conscious of wildlife and erosion areas and will now be punished if these proposals go through.</p> <p>I am in total disagreement of any of these proposals going through.</p>
Colin McLeod	2, 4 – 7 & 12	<p>Stock exclusion – distance from waterways: I think 3m is quite adequate as weeds will grow in this ungrazed area and the farmer will need to maintain it annually. This also means less grazable land for the landowner. Wild ginger loves a damp area and weeds are already out of control in Northland!</p> <p>Managing erodible land: Taking away usable land from the landowner is taking away his income. The rates will go up to cover the proposed subsidies. Partial subsidies will mean that the landowner will go broke. A landowner should be able to plant any tree he wants without the risk of future land changes. He needs a guarantee that he will be allowed to harvest his trees in the future. A lot of the erodible land areas are inaccessible which means that in order to fence off, tracks will need to be formed at considerable expense which will also lead to consents to move earth, to facilitate fencing.</p> <p>Cultural Impact Assessment: I don't agree with the need for cultural impact assessments for R.C. as any significant historical areas are already known and respected.</p> <p>Furthermore, the council needs to get their own house in order, as in years to come we will not be able to get to our property because of the destabilisation of the structure of the roads (and extremely poor maintenance of road drainage)</p>
Grant McPherson	1 – 6, 8 – 11	<p>The vision is admirable. Most NZ people would support the vision strongly.</p> <p>The issue that seems to be not well addressed is the impact on the land owners and how they would be compensated. These land owners are crucial people that perform an immense proportion of our productive capacity as a province of NZ and contribute to the whole nation's wealth.</p> <p>The proposals seem to place the burden of costs almost entirely on those people alone. For a start this is grossly unfair.</p> <p>On a more fundamental point, this seems to be an infringement of existing property rights that existed when these land owners purchased the land titles.</p> <p>Managing highly erodible land is a supportable suggestion as the ability to use carbon credits helps to neutralise the economic effects.</p> <p>Eliminating discharges into water is a highly supportable topic and already has strong existing support from the majority of farmers.</p> <p>Managing exotic forests is important. Many downstream land owners have been subject to very high costs and workload when repairing damage from cut over forest wash outs after flooding.</p> <p>Stock exclusion distances from water ways clearly a major factor in reducing water contamination. The problem is that most of the affected farmers have already expended considerable money and resources in fencing their waterways and now the NRC expects them to fence the land again with no financial assistance. If this was forced on the wider public sector it would be robustly challenged.</p> <p>Also the reduction in productive land available to the farmers adjoining the waterways are looking at substantial loss of productive land with no indication of compensation.</p> <p>Although the likely desirable time frames for stock exclusion are short, this would be grossly unfair to the affected land owners and potentially a serious economic impact.</p> <p>Managing water allocation would seem to be a fundamental part of the Fresh Water Plan. Even existing water take rights sometimes have to be reassessed at times. The ability for waterways to maintain adequate flow rates is indisputably essential.</p> <p>Tangata whenua naturally should have rights to submit suggestions and recommendations, just as we all have as citizens. But there are no such rights, from my perspective, for one group to have a greater influence than other people or groups of people. For many of us, we all hold this land and it's</p>

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		<p>protection dearly and there is no enshrined rights for one group to claim this sentiment more than another.</p> <p>Funding support for the changes would seem to be a proper way to assist those land owners who would be impacted. If their property rights are altered due to prior unforeseen changed factors (at the time of the purchase), then it would seem right and proper for them to receive some degree of compensation, even if it does not cover the full economic impact.</p>
Gwilliam McPherson	6 & 7	<p>I have a number of HEL areas highlighted on the map. I have been working closely with Fonterra to create a farm environment plan which has created a management plan for these areas. This is an effective way to address my at risk areas that I can work to.</p> <p>I do not see the need to have a blanket stock exclusion if it is not necessary. Consents will be slow, costly and create uncertainty.</p> <p>Do I need to adjust my existing fences to 10 meters? I have already fully fenced my dairy farm to the current rules.</p> <p>At 10 meters, I have concerns with the ability to maintain the waterways.</p>
John Meekings	6 & 7	<p>I fundamentally agree with the concept of improving Northlands freshwater, however, I am a dry stock farmer, farming on marginally profitable land.</p> <p>There are areas in this plan that would be extremely detrimental to my operation, and I feel some of the rules being proposed are over the top and go beyond what the National NPS sets out</p> <p>I have had a look at the Highly Erodible Land map and expect that there are at-risk areas that need to be addressed. However, there are small pockets that would be impractical and extremely expensive to fence.</p> <p>I also have concerns about what constitutes intermittent water way, and the cost and impact of setting 10m+ fencing along these areas.</p> <p>I am currently in the process of adopting a farm environment plan, and this is addressing much of what the draft plan is targeting, but in a much more practical way. I would be concerned if I then had to go further with stock exclusion or seek consenting.</p>
Stephanie Membery	1, 2, 4, 6, 7, 9 & 11	<p>I support the vision and objectives to improve and reverse the sediment and e. Coli load in our streams.</p> <p>Targets should be what we dream of. Aspirational with short term targets and timelines, what we want to change and when we expect to see results from the knowledge we have now.</p> <p>Erosion in the future will be related to climate change a lot more in the future. Change of any sort is always meet with some challenges, but we cannot leave practices the way they are. History has taught us this is not serving our freshwater environment. We now have the benefit of hindsight to help us change to adapt to a more sustainable future. A future where our human impacts will have less impact.</p> <p>Stock exclusion from waterways needs to be gradually changed to a wider setback. Science has told us what is required. Any less than what science has recommended would not be achieving the ultimate aim. Could any fenced off areas or exotic forest areas not farmed have a rates exemption. They are no longer used for any human purpose so rates should be nil or minimal on these areas.</p> <p>Exotic forests should be under this plan. Regionally we have different soils and climates. Exotic forests should have setbacks from waterways according to gradient and these may have to wider in some areas as harvesting practices will have to change. Can we learn from overseas practices?</p> <p>Setbacks also required around skid sites where slash is accumulated for when rainfall events arise. A management plan prior to harvest with photos and monitoring and reporting back to NRC on skid sights once harvest has been completed until NRC agrees the slash in the area would no longer be an issue in a rainfall event. This will be a number of years later. In this way more is put back onto the large international companies who financially could absorb this more than NRC? They also have an international duty to ensure they are supporting communities as part of international agreements when they sell our exotic wood overseas.</p> <p>Lobby for more research and then marketing of improved farming practices on mixed gradient land. It is being done by a few but word and knowledge needs to spread within the farming community for lasting change.</p>

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		<p>Water allocations including water takes and bores need to be regionally allocated. Freshwater will be limited in the future and we need to know now who is taking water so any future water allocations would be made with this knowledge, protecting those who currently have them.</p> <p>Those who benefit from using freshwater need to start paying more for freshwater so NRC have funding to implement remedies. No idea if this is even possible but how will funding for improvements be possible. Hopefully some amazing ideas in this space come through.</p> <p>Doing a great job team. A very hard job but as a public ratepayer I feel your consultation has been wide and as inclusive as possible with limited resources. Kia kaha. Looking forward to changes in freshwater.</p>
Robert Meyst	6 & 7	<p>We live next to the Waiarohia stream and often walk along the Hatea River. I note that the Waiarohia and Hatea rivers now have stock excluded. This has made a significant improvement to the water quality, and they now run clear.</p> <p>I recently canoed along the Horahora river (Pataua) and noted that stock are not excluded from the river the water quality is poor, with lots of scum on the surface and sediment in the water particularly along the parts of the river adjacent to unfenced farmland. This river is fairly scenic with lots of mangroves and native bush along parts of the river. There also appear to be teal present.</p> <p>I am disgusted that farmers are allowed to pollute rivers like this one and others in the region. I am also disgusted that the regional council which is supposed to be responsible for the rivers has not done more to protect the river environments. All rivers should be fenced to exclude stock with a suitable margin to allow vegetation to establish on the river bank, prevent stock damage, reduce erosion and other storm damage.</p> <p>I also note that in the Glenbervie forest huge piles of forestry slash has been left on the river flats. If there is a major storm/flood this could cause problems downstream in the Wairoa and Hatea rivers. There need to be rules to ensure forestry companies leave slash safely or preferably utilize most of it for wood chips. Forestry companies should be liable for any damage caused by slash.</p>
Tracey Mita	1 – 3, 5, 6, 9, 10 & 12	<p>(Use this funding allocate to youth mental camps/centres/hubs)</p> <p>The room for error is high!. N.R.C , Kawanatanga literally delivery of this kaupapa is crucial the amount of "cross threading" and rushing policies sends my xbox controller in vibration mode.</p> <ul style="list-style-type: none"> <li>- engage at(monthly) marae trust meetings</li> <li>- support more educating programmes who support kaupapa wai - W.B.C / E.M.R (Northland)</li> </ul> <p>i could go on .... but that first one each at least ...ALL councillor needs to do an extra job after mahi... Toitu te Tiriti</p>
Brett Mitchell	2 - 7	<p>We farm along the coast and have a keen interest in farming sustainably, but also profitably.</p> <p>The stock exclusion on the hill sides and water ways (particularly intermittent water ways) seems excessive and unpractical in places.</p> <p>After looking at the slope maps, it reflects the areas that I am already aware of as requiring special management. I believe that these areas can be managed through best practice and good management. We have had a farm environment plan completed, and are working towards completing the actions outlined.</p> <p>The rules to fence 10m on intermittent waterways would severely impact my farming operation. not every waterway is the same, and should be managed appropriately. I appreciate that there are areas that do require 10m set backs with planting, but there are other areas that this would be overkill. I am prepared to create a feasible plan to complete this to get the best outcome.</p> <p>We currently discharge all our effluent to land, following the permitted activity rules with no issues. By moving to a consented activity this will add costs, administration, and uncertainty. Please show me why it is not working as a permitted activity. We farm in a very low-impact manner (Once a day milking, low N, low input). Additional cots and paperwork for little environmental impact is not appreciated.</p> <p>By introducing Tangata whenua Impact assessments, makes getting a consent even more difficult. It is another level of bureaucracy. I have no idea who I would even talk to start this process. Will there be a cost attached to it?</p>

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Patricia Ann Monro	1 - 11	<p>Thank you for the opportunity to express my support for the draft Freshwater Plan Change proposed by the Northland Regional Council (NRC) aimed at aligning with the Government's National Policy Statement for Freshwater Management 2020 (NPS-FM 2020). I am impressed with the thoroughness with which this has been prepared and recognise we are very fortunate to have such skilled professionals on our Regional Council acting on behalf of us all.</p> <p>We are all well aware that without freshwater life on earth cannot live and there have been numerous excellent papers produced drawing attention to the parlous state of our freshwater situation in Northland and the need to address this urgently and guarantee security of supply for the future and generations to come. The Open Letter to Prime Minister Christopher 'Don't take Freshwater Policy Backwards' from 50 freshwater experts and leaders to retain the NPS-FM 2020 and make no changes to Te Mana o Te Wai (18/12/2023)' says it all far better than I could.</p> <p>My main areas of concern are:</p> <ul style="list-style-type: none"> <li>- adequate funding and resourcing for monitoring and enforcing the requirements. Historically funding has been a significant block to enforcement, support for complying and ultimately prosecution if all else fails.</li> <li>- support and recompense for those significantly affected e.g. farmers</li> </ul> <p>I note the farmers key views:</p> <ul style="list-style-type: none"> <li>- We want the freshwater plan change to strike a good and reasonable balance of addressing Northland's water quality challenges - and an efficient, effective and achievable timeframe in which to do it.</li> <li>- The proposed blanket rule approach does not cater for the sensitive and diverse environments and ecosystems in Northland or recognise the diversity and relationship that exists between farms and our communities.</li> <li>- We want NRC to use existing FW_FP tools to describe and outline required on-farm practices to mitigate negative environmental effects on waterways.</li> </ul> <p>These seem eminently reasonable and I would request that the NRC work with all affected bodies as collaboratively and effectively as possible to ensure the desired outcome.</p> <p>In this way the NRC will be well ahead of whatever plan the present government produces in 2027 thus minimising further significant deterioration of our freshwater in the meantime.</p>
Dylan Montgomerie	2, 4 & 7	<p>The stock exclusion maps seem very heavily averaged. Some of the areas i see are excluded are barely hills. No pictures of the complete slump in the hills of "exotic forest that had just been harvested or has trees less than 10 years old, as that was the most smashed land in my area. In contrast grassland didn't seem to suffer as much.(might be biased, bit fed up with my road sliding into the river because the logging trucks weigh more than a small star.)The government refuses to acknowledge the carbon value of long term native forestry. Will this not just force large amounts of land into pine and the cost of currently rebounding Totara (they cut it all down when they plant pine). Also why are dairy cows exempt. Pretty sure a dairy cow rips through ground many times harder than sheep. Just letting you know im not happy and these are some of the areas that perhaps more education is needed. or another look by the paper pushers.</p>
D Moore	1, 6, 8 & 11	<p>First and foremost, I support the idea of improving our water.</p> <p>We have 50 acres with 2 streams crossing the width of our property. We have no existing fencing along the streams. We have no alternative option for water for the stock. A large majority of the streams have some existing bush or tree cover though.</p> <p>The problem for us is that we don't earn an income off the place. We already can't afford fertiliser and weed spray. We already can't afford to fix fences and gates, water lines, races and stream crossings. We live week to week, in an improvised dwelling. We have no savings and dont qualify for any loans. Repayment of any loan would be extremely difficult. So matter how forward planning we be, how prepared we are for an approaching date, it's just impossible for us to achieve.</p> <p>Will there be any special loans available for those that would like to be obliging but just can't financially achieve this goal?</p>

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		<p>Another problem for us is the physical aspect of fencing and planting. We don't have a vehicle that can access our paddocks. so all materials would need to be man handled down (and up and down) the farm. My husband has a stuffed back and I suffer fatigue. We would need to fund 90 percent of the labour cost involved instead of being able to do it ourselves.</p> <p>And how devastating for us, if we manage to pull off this stock exclusion, if our 3 neighbours don't comply. Which I know they won't. The heart break of our sacrifice not being effective because of not having everybody on board. And the possum devastation of any planting.....whole new effort and expense.</p> <p>So, in short, im excited about the plan, but I don't see us being able to do it unless there are special no interest loans with very small repayments.</p> <p>P.S where on earth can we get such cheap plants as have been mentioned. Not anywhere I've been.</p>
Allan Moscrip	2, 6 - 8	<p>Farming for an improving environment is important to us.</p> <p>We have worked hard with Fonterra to generate a farm plan which is robust. It highlighted our risks, and a time frame for us to work to. We have done so much work, which perhaps goes above the Council requirements.</p> <p>Working with people like George Kruger who have knowledge and expertise is far more valuable than if we had to get consents, or farm to strict rules which do not always make sense.</p> <p>I understand that there are farmers who are not on board with change. It really upsets me that I still see bulls in the river. There needs to be more focus on bringing the bottom up and enforcing the existing non-compliance, not making it harder for the bulk of farmers who are already making positive changes. Please take into account the capacity of farmers. It is hard enough to make a living as it is.</p> <p>I would like to see more of a catchment approach. In our area, we have serious issues with the impact of forestry. We need these rules tightened up.</p>
Jeremy Mounter	4 & 5	<p>Who is in charge of iwi consultation? In my experience, there has been a lot of disagreement within Iwi, and this runs the risk of causing confusion, holding up proceedings and causing undue costs. Please explain this further.</p> <p>I highly encourage strict regulations around pine tree harvests and sediment controls</p>
Rolf Mueller-Glodde	1 - 12	<p>I fully support the "draft Freshwater Plan Change".</p> <p>New Zealand's and Northland's wellbeing of people and economy depend on clean water.</p> <p>The present situation of unclean rivers and lakes is not sustainable and requires urgent action. This might require rules and restrictions limiting immediate economic outcomes of individual operations, but they are necessary to ensure their long-term success. Dirty rivers lead to dirty coasts with impact on recreation and fisheries.</p> <p>The described Tāngata whenua perspectives on water are appropriate.</p> <p>NRC must be expected to impose such required rules and restrictions as well as to enforce them in conjunction with District Councils.</p> <p>Sedimentation and E.coli (irrespective of human from faulty/overflowing septic tanks or animals) in rivers and lakes must be stopped. Wherever they are noticed, the source of pollution must be investigated and stopped. The present finger pointing from one to the other Council must stop. Water testing and the website <a href="https://safeswim.org.nz/">https://safeswim.org.nz/</a> is good to have for the time being, but action is required to improve the situation vigorously.</p> <p>The lack of riparian planting and fencing must be rectified with regulation, advice and support.</p> <p>I especially support</p> <ul style="list-style-type: none"> <li>- protection of highly erodible land</li> <li>- 10 meter setback for cattle, although more might be appropriate/necessary in certain areas like steep land to avoid erosion and pollution</li> <li>- stock exclusion rules to our most highly erodible land and encouraging stabilisation of these areas with trees. It would be effective at reducing sediment runoff and make slips less likely and less</li> </ul>

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		<p>severe. Furthermore, some of the costs of excluding stock from this land can be recouped by planting in carbon forestry or permanent forests that are selectively logged.</p> <ul style="list-style-type: none"> <li>- add non-dairy stock to be excluded from hill country wetlands</li> <li>- stock exclusion should be extended to apply to all farmed animals</li> <li>- phasing in new stock exclusion requirements over the next 10 years or so, if not possible earlier (maybe with incentives)</li> <li>- &gt;&gt; surely the estimated short term cost will lower than the long term effects of erosion and pollution</li> </ul> <p>I also support the draft Water Allocation Policy.</p> <p>Water is a limited resource which needs to be treated, managed and allocated responsibly to avoid problems in the future.</p> <p>The current 'first in first served' system is unsustainable and unfair.</p> <p>I support the 20% water allocation policy to improve cultural, social, economic and environmental outcomes for wai</p> <p>I support the existing "Actions", but</p> <ul style="list-style-type: none"> <li>- While monitoring and research is essential, they need to lead to more action.</li> <li>- I consider Action 7: Compliance and Enforcement of existing rules as insufficient.</li> <li>- e.g. when E.coli is found in the Kerikeri River, the source has to be searched and eliminated rather than just noted. Vision Kerikeri was informed by the previous CEO that the E.coli was caused by "... in the Kerikeri Basin (ducks, geese, doves, gulls) which VKK's water testing at testing stations further upstream proved wrong (also polluted); also repeatedly the testing showed much higher E.coli levels after heavy rain; thus it needs to be researched whether the source is human (ill-functioning septic tanks) or bovine (stock in or near the river); in case of septic tanks, immediate cooperation with FNDC is required</li> <li>- 176 abatement notices and 101 infringement notices within one year seem to be very low</li> </ul> <p>I support Potential Action 8: Funding to support stock exclusion, riparian planting and restoring wetlands</p> <p>I support Potential Action 9: Increased compliance</p> <p>I understand that it is costly, but with stricter enforcement, penalties for non-compliance can cover at least part of the cost. The effect might be more volunteer compliance to avoid penalties. It is obvious that Action 1: Freshwater state of the environment monitoring programme with about 20 staff is expensive, but possibly ineffective without researching causes with a lead to compliance - so cost might be shared for the two Actions.</p> <p>I support Potential Action 10: Supporting tāngata whenua involvement in freshwater management and decision-making</p> <p>In regard to New potential actions over and above existing NRC commitments it's difficult to judge whether numerous points cannot be covered by existing staff and what the impact on rates would be. While personally I would be prepared to pay more rates for more positive impact on the environment and climate, it might be tough for the majority of ratepayers to do likewise?</p> <p>Waste Water Effluent</p> <p>For ecological and cultural reasons it is essential to stop waste water effluent into waterways. All existing WWTPs need to be changed asap. Appropriately cleaned waste water (e.g. with low cost Electro Coagulation) can provide valuable food safe irrigation water and fertiliser.</p>
Catherine Murupaenga-Ikenn		<p>As a member of the public and a Te Tai Tokerau resident, I am greatly concerned about the poor health of freshwater and the urgent need for us all to treat wai with more respect. I am seeking your support and action to ensure that the proposed freshwater plan change and action plan, and the Long Term Plan, uphold Te Mana Me Te Mauri o Te Wai, as a matter of urgency and priority.</p> <p>1. It would also be good to see Northland Regional Council consider what it has proposed in the draft plan change and action plan along with other ways that things can get done because, delivery by</p>

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		<p>NRC is not the only way, nor the most effective and efficient. The things that are important to me are listed below.</p> <ol style="list-style-type: none"> <li>Te Mana Me Te Mauri o Te Wai is fundamental and central to improving water quality in Te Tai Tokerau – we all need healthy water for healthy lives and livelihoods.</li> <li>Supporting tangata whenua and communities to undertake actions on the ground – NRC's focus has to be on enabling community-based action that results in long-term environmental gains and promotes sustainable livelihoods.</li> <li>Tangata whenua have been managing their wai and whenua, based on tikanga, kawa and mātauranga – NRC should be supporting kaitiaki and not standing in the way of rangatiratanga.</li> <li>We need to change how we think about and treat our wai – we must listen to our awa, repo and roto. Improving the mauri (life force) of wai is a prerequisite to sustainable livelihoods in Te Tai Tokerau. How we use our lands and forests needs to change and NRC's role is to support and enable landowners to use their lands in ways that result in improvements to freshwater first and foremost. I support giving greater respect to wai as a living entity with a right to be healthy and thrive (legal personhood).</li> <li>It is not sustainable to continue enabling land uses that result in declining freshwater health. Flexible and adaptable approaches are needed that support and encourage communities to work together at local levels. Setbacks and stock exclusion policies and rules should come along with NRC support to landowners to sustain alternative livelihoods from riparian margins and highly erodible land which results in environmental improvement and enhancement as quickly as possible. Incentives could be negotiated with financing institutions for loans to support fencing wider setbacks and permanent native reforestation and wetland and riparian restoration. Council should not only consider the economic costs to landowners when considering the actions proposed but also the gains and benefits from improved freshwater health to all.</li> <li>NRC budget allocation must consider how service delivery (such as resource consents and environmental monitoring) might be more effectively and efficiently delivered and not assume that it is the council who should be making decisions and managing freshwater. This means also committing to and following through on transferring powers and functions to māori, entering into (and implementing) relationship agreements and contracting tangata whenua direct involvement in freshwater management to name some examples.</li> <li>The freshwater plan change and action plan needs to focus on the freshwater needs of our children and grandchildren and not the short-term economic gain of a few. With this in mind, I would like to see climate change, Te Mana Me Te Mauri o Te Wai, empowering our local communities to improve freshwater health and ecosystems at the top of the list for priority action. Ensuring that the health and well-being of wai are put first and foremost in all NRC's planning and decision-making on freshwater is critical to our ability to sustain livelihoods. Further work on future water demand in light of up-to-date climate science is needed, including consideration of relocation of settlements, kāinga and marae and their future water needs, as well as population growth and migration.</li> <li>It is important to me that spending is aligned with Climate Action and proper consideration of ways in which water wastage can be reduced, alternatives that will reduce demand for freshwater takes (e.g. desalination or cropping choices) and more equitable allocation approaches to the existing 'first come first served' approach must be explored and implemented. I support the proposed targeted water allocation policy which would set aside 20% of any allocation for particular uses such as marae, papakāinga, māori land use, and environmental enhancement. Associated funds generated by applications for other uses should be used to support community-based and hapū led freshwater improvement activities in Te Taitokerau.</li> <li>It is also important to me to be able to be part of wider NRC decision-making, beyond providing feedback on the draft freshwater plan change and I request that you keep me updated on what NRC is proposing in relation to freshwater, Te Tiriti, climate change and budget and LTP decisions.</li> <li>Mana whenua must be involved in any further development of this freshwater plan change and action plan and the Long Term Plan must include sufficient budget for input from tangata whenua from development through to implementation. The focus must be on supporting whanau, hapu</li> </ol>

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		<p>and iwi action on the ground working at the community level to improve freshwater in Te Tai Tokerau.</p> <p>The council needs to demonstrate it is taking its Te Tiriti partnership roles and responsibilities seriously and recognise He Whakaputanga and the findings of the Waitangi Tribunal relating to freshwater.</p>
Rebecca Myhre	2, 3 & 6	<p>I think the stock exclusion from waterways should be at least 5 but preferably 10m. It is amazing travelling in Switzerland where they have exclusion areas for. Waterways. The health of their fresh water ways is impeccable.</p> <p>My preference for managing highly erodible land is to be regenerated with the planting of native trees.</p>
Josephine Nathan	1 - 11	<p>The present mana, ora and mauri of water in Te Tai Tokerau is critical. How is NRC itself contributing to restoring wai māori in our rohe?</p> <p>Crown agencies do not willingly acknowledge their role in the oranga of our Taonga and the part they have played in how we got to this current deficit. How can you now suggest that the clauses for domestic uses by papakainga and marae (Clause b) and development of Maori land and Treaty Settlement asset (Clause d) will provide greater opportunities for high deprivation communities to gain access to resources that will contribute to their economic and social wellbeing when in fact Maori health has declined because the environments became unhealthy at the hands of the crown?</p> <p>So try flipping that scenario around and then you come to the crux of the problem brought about by the dishonouring of the crown to Te Tiriti o Waitangi; Maori are not the problem. Now you want Maori to become a partner of the solution and practice kaitiakitanga and manage the crown's mess? The only solution is for NRC to fix it, fix it fast and fix it at the expense of the crown while hapu and whanau monitor your progress to hold you accountable.</p>
Michele Neckelson	2, 6 - 10	<p>Managing highly-erodible land - This regulation will essentially put hundreds of farmers out of business. Farmers manage these areas as part of their farm management plan. Most farmers have farmed this land for long periods of time and know how to manage the soil integrity and recovery. IT is in the farmers best interests to do so for productivity of their farms. The slope rating is flawed and can not be imposed across the board as there are multiple non standard contributing factors that are specific to each area and farm for example, rain fall, stock units acre, grass types, tree planting, fencing patterns and structures. It is not a one size fits all kind of approach. To do this will kill the farming industry in the North and put many people out of work and business. Industries that maybe impacting the most on sediment in waterways is forestry and the harvesting of trees, the slash, soil damage from harvesting all flows down hill into waterways as there is no grasses holding soil in place. In this industry there appears to be no accountability at all by the land, forest or harvesting owner as was shown in the 2023 cyclone that hit the east cape of NZ. Also to consider is the extreme out of character weather events we have experienced in the last few winters this is totally out of any ones control. mother nature will do as she pleases and the council powers that be will be damned as far as she is concerned. Another thing to consider is that if land is deemed to steep to farm by council it will not be fertilised or grazed. If that land is not returning income for the farmer it will be left to revert back to wild ginger, wilding pines, ragwort, tobacco trees, gorse and the like. All of the north looks like the wild west. If this land is to be excluded by the council and not allowed to be farmed because of legislation will there be rate relief for these tracts of land ? In my mind how and why should you pay rates on land that is not able to be used for its intended purpose. There is a movement for all farms to have a farm management plan i think by 2025, Which comes as a cost to the farmer to establish and document. We have just undertaken this for our family farm through NZ beef and lamb. It is a very thorough process that involves analysing your farms land and land use and many other things farming related. We have changed some of our practices for the better of our land, our stock, our growth and our income. Beef and lamb have done a good job in providing robust frame work for farmers to use in their farm management plans. This framework has been developed by consultation with people from diverse back grounds, academics, farm consultants, farmers, scientist etc etc. I think the council needs to review the beef and lamb farm management process, step back and allow the farmers to work their way through a farm management plan that is relevant to their farm, their location and their farming practices. As a general comment. NZ's economy relies on farming productivity to produce the very best products, be it dairy or meat. Farmers as a whole are great care takers of their land, they have to be to produce top</p>

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		<p>quality product to maximise income. It is their best interests to protect their asset - the land and waterways. If all of rural NZ suddenly has this slope rule imposed on them the down turn quantity in the produce for domestic and overseas markets will have catastrophic ramifications to the money NZ earns for selling our dairy and meat be it off shore and or locally. It will potentially price meat off the market for the average NZ. Its a vicious cycle that starts down on the farm but ends up on (or not) on Joe Bloggs' plate. Please consider the BIGGER picture before imposing unworkable sanctions on land and water ways.</p> <p>Water way exclusions and fencing. - There is already a movement underway for farmers to protect water ways. Most farmers are aware of this, some have been proactive, some have not, some are doing piece meal as funds and time allows. I think your estimate of costs is so incredibly low. I cant imagine how they came upon this figure! It is not at all realistic. (NRC have estimated the costs to be between \$8,200 and \$24,500 per farm per year for fencing depending on the setback) Imagine if the local councils told every rate payer they had to stump up \$8,200 to \$24,500 to fence their property? The uproar would be massive, who, regardless of income stream has that sort of money available? not many, so why should farmers be made to fence to the council's time line. There is an assumption that farmers make lots of money, perhaps for those mortgage free this is true. The reality for most farmers is - a hefty, substantial mortgage that on top of operating expenses and living expenses leaves very little for extras. Yes fencing is an operating cost but it needs to be budgeted for and is usually done in small increments not in a lump sum that is not how it works as a general rule. There is budgeted amounts for replacement fences or to repair fences, for development of new fences in small hits. For a farm that has a water tributary running through the centre of the farm like ours does \$24,500 wont pay for half the materials and makes no allowance for the machinery hours and farmer's hours spent actually putting up the fences which has a value as it takes him/her away from other farm duties. There is not allowance for repairs to the fencing that maybe damaged or swept away in the 1 in 50-100yr floods. Then there is the riparian planting and on going management of the planting. Its not a plant and walk away, you need to clear kikuyu grass to stop flaxes and trees being overwhelmed by the grass and dying. Trimming or pruning if necessary. replanting if losses are sustained during flooding. Farmers labour has a cost just like an office workers has and hourly rate. I am not sure what or how councils think, have they actually spoken to any farmers at all for guidance / advice or are they taking advice from university graduates with rose coloured glasses on that have no life or real farming experience? Do they think that farmers have all the time in the world to do fencing? its not a 9-5 job. farmers are on call 24/7 365 days of the year - spare hours for fencing don't just happen they need to be planned for. I agree that water ways need protecting and should be managed by the rate payer who's property the water way runs through. Not by an outside or even local tāngata whenua who has no financial input to the waterway, does not have any idea what the waterway looks like in full flood, has no history with the waterway. IN this day and age all Marae have water or access to water, in most rural settings this water is stored in tanks, in dry seasons more tanks are required to store water that is the same for all rural water users regardless of creed. It is on us the rural users to provide tanks to store water we need. In towns the councils have set up infrastructure that ensure water availability for all regardless of creed. there are water quality controls in towns to safe guard all water users, in rural areas we must supply our own water quality controls but that is the cost of living rurally. I do agree with the control of water usage for areas using irrigation or intensively stocked farms as this is an area i think has been exploited in the past. technology has allowed better monitoring, measuring and understanding of water usage now, For these particular instances there needs to be controls in place. Allow the farmers to be the kaitiaki of the wai as part of their farm management plans.</p> <p>Farming in general is an ever evolving science. So much more is known now about farm management than was known 10-20-30 years ago. The next generation are utilising knowledge gained from learning institutions along with practical on farm experience. These next generation farmers want to be the best kaitiaki of the their land and their water ways for generations to come. they want to be proud of their contribution to making their farms the best environmentally as they can. There are organisations like Beef and Lamb and meat companies that are working along side farmers helping them comply their farms to meet standards that allow them to market our farming produce all around the world. There is an army of people working behind the scenes that i wonder if the Councils are even aware of.</p>

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Mina Neho		<p>As a member of the public and a Te Tai Tokerau resident, I am greatly concerned about the poor health of freshwater and the urgent need for us all to treat wai with more respect. I am seeking your support and action to ensure that the proposed freshwater plan change and action plan, and the Long Term Plan, uphold Te Mana Me Te Mauri o Te Wai, as a matter of urgency and priority.</p> <p>It would also be good to see Northland Regional Council consider what it has proposed in the draft plan change and action plan along with other ways that things can get done because, delivery by NRC is not the only way, nor the most effective and efficient. The things that are important to me are listed below.</p> <ol style="list-style-type: none"> <li>1. Te Mana Me Te Mauri o Te Wai is fundamental and central to improving water quality in Te Tai Tokerau – we all need healthy water for healthy lives and livelihoods.</li> <li>2. Supporting tangata whenua and communities to undertake actions on the ground – NRC's focus has to be on enabling community-based action that results in long-term environmental gains and promotes sustainable livelihoods.</li> <li>3. Tangata whenua have been managing their wai and whenua, based on tikanga, kawa and mātauranga – NRC should be supporting kaitiaki and not standing in the way of rangatiratanga.</li> <li>4. We need to change how we think about and treat our wai – we must listen to our awa, repo and roto. Improving the mauri (life force) of wai is a prerequisite to sustainable livelihoods in Te Tai Tokerau. How we use our lands and forests needs to change and NRC's role is to support and enable landowners to use their lands in ways that result in improvements to freshwater first and foremost. I support giving greater respect to wai as a living entity with a right to be healthy and thrive (legal personhood).</li> <li>5. It is not sustainable to continue enabling land uses that result in declining freshwater health. Flexible and adaptable approaches are needed that support and encourage communities to work together at local levels. Setbacks and stock exclusion policies and rules should come along with NRC support to landowners to sustain alternative livelihoods from riparian margins and highly erodible land which results in environmental improvement and enhancement as quickly as possible. Incentives could be negotiated with financing institutions for loans to support fencing wider setbacks and permanent native reforestation and wetland and riparian restoration. Council should not only consider the economic costs to landowners when considering the actions proposed but also the gains and benefits from improved freshwater health to all.</li> <li>6. NRC budget allocation must consider how service delivery (such as resource consents and environmental monitoring) might be more effectively and efficiently delivered and not assume that it is the council who should be making decisions and managing freshwater. This means also committing to and following through on transferring powers and functions to māori, entering into (and implementing) relationship agreements and contracting tangata whenua direct involvement in freshwater management to name some examples.</li> <li>7. The freshwater plan change and action plan needs to focus on the freshwater needs of our children and grandchildren and not the short-term economic gain of a few. With this in mind, I would like to see climate change, Te Mana Me Te Mauri o Te Wai, empowering our local communities to improve freshwater health and ecosystems at the top of the list for priority action. Ensuring that the health and well-being of wai are put first and foremost in all NRC's planning and decision-making on freshwater is critical to our ability to sustain livelihoods. Further work on future water demand in light of up-to-date climate science is needed, including consideration of relocation of settlements, kāinga and marae and their future water needs, as well as population growth and migration.</li> <li>8. It is important to me that spending is aligned with Climate Action and proper consideration of ways in which water wastage can be reduced, alternatives that will reduce demand for freshwater takes (e.g. desalination or cropping choices) and more equitable allocation approaches to the existing 'first come first served' approach must be explored and implemented. I support the proposed targeted water allocation policy which would set aside 20% of any allocation for particular uses such as marae, papakāinga, māori land use, and environmental enhancement. Associated funds generated by applications for other uses should be used to support community-based and hapū led freshwater improvement activities in Te Taitokerau.</li> </ol>

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		<p>9. It is also important to me to be able to be part of wider NRC decision-making, beyond providing feedback on the draft freshwater plan change and I request that you keep me updated on what NRC is proposing in relation to freshwater, Te Tiriti, climate change and budget and LTP decisions.</p> <p>10. Mana whenua must be involved in any further development of this freshwater plan change and action plan and the Long Term Plan must include sufficient budget for input from tangata whenua from development through to implementation. The focus must be on supporting whanau, hapu and iwi action on the ground working at the community level to improve freshwater in Te Tai Tokerau.</p> <p>11. The council needs to demonstrate it is taking its Te Tiriti partnership roles and responsibilities seriously and recognise He Whakaputanga and the findings of the Waitangi Tribunal relating to freshwater.</p>
Chris Neill	1 – 9 & 11	<p>I support initiatives that will reduce the sediment loading and harmful microorganisms in our waterways to provide a healthy environment for current and future generations. I accept that we and previous generations have been motivated by personal and collective goals that have created the current levels of water degradation and that there is a cost to bare in rectifying this. The challenge lies in making meaningful improvement while sustaining the land use which is necessary to fund the remedial efforts and community wellbeing.</p> <p>I believe Northland soils, topography and rainfall will contribute to erosion and sediment loading in our waterways even in its indigenous cover. Soil exposed by overgrazing, poor cropping practices and forestry compound this soil movement and some means of control is required for these activities. Sediment movement needs to be measured within catchments and landowners within the catchment held responsible for implementing control measures to achieve agreed or specified standards. This should lead to limiting activities that cause soil movement and creation of sediment catchment structures appropriate to individual catchment needs. The management and exclusion of stock on specific areas within individual farms moves responsibility to the regulatory authority to be engaged with the complexities of individual business operations rather than staying focused on the quality of water within catchments. Southland catchment work provides a worthy example.</p> <p>I agree with eliminating discharges to water. The potential risks of extreme weather events or prolonged wet weather conditions will need to be acknowledged and accounted for so that the cost of building effluent containment and discharge to land systems are manageable costs. This will call for reason, discretion and good communication at the inspectorate level.</p> <p>I expect tighter control of forest tracking and harvesting. The land used for forestry is typically of steeper contour and the periods of activity are intense leading to soil exposure and movement. It is not acceptable to take an average of soil movement across the life of the crop when comparing it to other land use. I would support set backs and buffers of permanent vegetation that filters sediment before it enters the waterway and then monitoring catchments for sediment loading from forestry activity.</p> <p>I support creating expectations of land use that avoids or at least minimises the impact on tangata whenua values. This expectation should apply across the community and include activity on Māori land.</p> <p>I support stock exclusion from waterways. The risk is that areas fenced alongside waterways become a habitat for weeds and pests which create significant cost to landowners and the downstream community. The size of the setback needs to be appropriate to the land use, be in stock class, stocking intensity, land contour and ground cover outside the setback area. Alongside this is the risk and cost of replacing fencing taken out in extreme weather events and the impact downstream of lost fencing materials. There has to be a better solution for keeping stock out of waterways that what we are currently doing. Until a fair and reasonable system is identified, the onus should simply rest with the owner of livestock that their livestock must not enter or contaminate waterways.</p> <p>I support the allocation of water to iwi with the expectation that they will have the intent and resource to "utilise" water allocated to them for the benefit of the wider community. That utilisation may be in some traditional or cultural activity which supports their values. Iwi input to other freshwater allocations should not be constrained by lack of resource which in turn delays the process for the applicant.</p>

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Glen Newlove	2,3,5,6,7, 8,10	<p>I strongly disagree with Stock exclusion on highly erodible land, To exclude stock from 25-35 degree slopes would exclude stock from a large percentage of Northland farm land. Thus in turn having a huge negative economic out come</p> <p>Stock exclusions to water ways- I strongly disagree that there should be wider set backs for stock exclusions of water ways other than what already in place. If the water ways are not maintained with proper drainage on flat land, then the land will revert back to swap land, thus becoming un farm able.</p> <p>I strongly disagree that dairy effluent discharge to land should have a resource consent. There are already good sensible rules around dairy effluent to land discharge, and when these rules are adhered to there is no negative effects on waterways. A resource consent for an already permitted activity just adds more time, bureaucracy and cost to farmers.</p> <p>I strongly disagree to having to recognize Maori values during decision making about water. New Zealand is one Country, we have one government and only one council per district/region. And I strongly disagree that Iwi/Maori are to have any say over council NRC freshwater management in any way.</p>
Tom Newlove	1,2,6,8	Totally Unrealistic our property is hill country
Frank Newman	1 - 11	We oppose the Draft Plan in its entirety. We will be submitting in person. We are asking for the Plan Change to be withdrawn.
C & S O'Shea		<p>O'Shea brothers beef farm in paradise....</p> <p>We feel that since the 1992 our land use rights have been eroded and indeed our ability to maintain an income from remote rural land use has become tested on all fronts. Sadly the raise in the expert culture has led to great time loss and psychological pressure culminating in submissions, hearings and indeed court cases.</p> <p>Our district plan has even taken out the provision dedicated to existing use rights.</p> <p>Now ,we seem to find ourselves reinventing the wheel, because farm plans with lots of consultation, cost and professional input will lead to Consents, monitoring ,and change. These changes ultimately lead to some properties leaving the industry. I feel this is a loss for the country, economically, socially and culturally.</p> <p>Because of our location we are ultimately in the real estate industry being a large land owner on an Island where 80%of the land is in D,O,C maori, or some form of reserve structure. There is little productive land pressure here. we have Auckland 100\$away, and there's prospective purchasers enquiring about land reasonably often. most Barrier farms have come to an end when our generation retires, because pioneer farming is marginally profitable , to dodge politics, and because selling is lucrative.</p> <p>But, us being culturally wound up in history and in pioneer legacy ,we are dumb enough to stay farming. Its who we are. And we are a small operation but we enjoy it.</p> <p>We await in tense anticipation to see how this fresh water plan is going to affect us. We are good guardians of our land, 60% is in bush. Please regard this as a submission of concern about effects of this proposed law. For me it reads as the beginning of the end of small back water farmers.</p>
Sean O'Shea	2,3,6,7,8, 12	<p>In my opinion and through my experience and research, much of the emotive politicized policy aimed at reducing NZ agricultural incomes by 25%, does seem a big step backwards and over reactive. I feel that yes, much of NZ farm land is challenging. Steep ,swampy or indeed possibly in a flood zone. But our specialness is our individual abilities of how we cope with these predicaments through management, education, cooperation and enterprise.</p> <p>We as a country need to foster, nurture and encourage land use in our sheep and beef sectors because food prices are about to jump up as 25%of our livestock disappear through climate politics. These industries are already economically tethering in peril. The expert culture is killing the enthusiasm in work place NZ.</p> <p>Often the pressure is put in the wrong places.</p>

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		<p>Hopefully the working rural NZ doesn't have to fight its own people to survive but I feel climate politics will turn us against our own and all will suffer. In areas where land is of a reasonably high value many farms are becoming lifestyle subdivisions. I applaud this action because NZ lawmakers have shown little empathy towards agricultural enterprise or hard work.</p> <p>We are planning our shift away from beef breeding reliance, and are looking at other ways of creating income to pay the fixed costs and hold the land for a few more generations.</p> <p>We feel the pressure to invent change and ultimately its the special rural character that suffers but. They made us do it. We are not going to own a private reserve. we want productive land.</p> <p>I feel betrayed by the NZ political system and its idea that farming needs to be monitored and regulated. We can't afford it.</p> <p>Time to fight back. let's not pay the rates.</p>
Paul O'Sullivan	9	<p>Every new home should have 2 new water tanks. One for drinking cooking etc. And one used for washing etc. This waste water can be then used for gardens etc.</p> <p>Also every new home should have to have Solar panels to alleviate power station usage.</p>
Robyn & Tim OLeary	6	Our property is prone to springs and drains all over the place , we have protected major water ways and wet land but applying ten meters would leave little for a functioning farm .
Luke Oud	6,7	<p>We are concerned with the proposed setbacks on all water ways being extended. On our farms the primary waterways are already fenced off. There are a number of minor drains through our farm and wider Ruawai that run through paddocks and flow on a very intermittent basis. When these drains are flowing, we are applying best management practices to stand cows off in appropriate off paddock facilities. We would like stronger definition of which waterways are significant enough for a 2-3 metre setback as opposed to drains which are more or less unnoticeable for most of the year.</p> <p>We have Farm Environment Plans for each of our farms written by Fonterra. We would be a fan of these becoming the basis of our Freshwater Farm Plan and continuing to be the guiding document for environmental management on farm.</p>
Pāmu (Victoria Caseley)		<p>Thank you for the opportunity to provide feedback on the Draft Northland Freshwater Plan and potential changes relating to stock exclusion. It is acknowledged that the Freshwater Plan is in draft and that options for stock exclusion are still being considered. As such this feedback is provided to assist with Northland Regional Council's understanding of the potential impacts and consequences.</p> <p>Pāmu are willing to work with the Council on this draft plan and stock exclusion options. With experienced planning and operational staff available Pāmu considers they are in a unique position to offer further insights and feedback. If you would like any assistance around implementation or potential impacts from proposed policies, rules or options please contact Victoria Caseley. The feedback provided, at this stage by Pāmu, relates specifically to the matters referred to below.</p> <p><b>Stock Exclusion</b></p> <ul style="list-style-type: none"> <li>Pāmu agrees that stock exclusion from waterway rules should not apply to ephemeral streams as generally this would be impracticable given their prevalence and locations.</li> </ul> <p>After considering the five questions proposed by Northland Regional Council around stock exclusion Pāmu provides the following feedback on questions 1, 3-5:</p> <p><u>Question 1 – How far away from waterways should stock be kept?</u></p> <ul style="list-style-type: none"> <li>Any proposed setback should reflect varying waterway ecosystem values within each catchment.</li> <li>Increasing setbacks to possibly 10m, or an average of 10m, would cause significant loss of productive land. The increased setbacks may also lead to paddocks needing to be re-fenced and water infrastructure needing to be moved.</li> <li>The discussion document states "... stock exclusion areas ... would need to be planted with native riparian vegetation."</li> <li>Increasing setbacks to possibly 10m, or an average of 10m, would cause significant weed burden and fire risk while native riparian vegetation establishes.</li> </ul>

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		<ul style="list-style-type: none"> <li>The Council has estimated that the costs for an average farm for a 10m setback would be between \$21,800 and \$43,000 per year. The costs include fencing, water reticulation, and lost operating profit, as well as riparian planting and ongoing maintenance. These figures are meaningless as farms will vary in the amount, and practicality, of stock exclusion required. The figure would have been better expressed at a per metre rate. It is therefore difficult to provide feedback on the cost estimates.</li> <li>Even allowing for sufficient lead-in time: <ul style="list-style-type: none"> <li>i. Insufficient fencing contractors may lead to increased contracting costs, and inability for farmers to meet exclusion deadlines.</li> <li>ii. This sector is currently under significant financial pressure. Potentially some farmers may struggle financially to meet these requirements.</li> </ul> </li> </ul> <p><u>Question 3 – What should the rules be for excluding stock from wetlands?</u></p> <ul style="list-style-type: none"> <li>Pāmu acknowledges that wetlands are important habitats.</li> <li>Any requirement to exclude beef, dairy support cattle and deer from hill country wetlands greater than 2000m<sup>2</sup> within the 5-6 years and from wetlands greater than 500m<sup>2</sup> within 10 years will have major cost implications for all Northland farmers, including Pāmu.</li> <li>The discussion documents refers to costs related to fencing and lost operating profit. This does not include what could be extensive costs associated with determining whether the area is a 'wetland' as defined in legislation or 'wet land'. In most cases this determination would require an ecological assessment.</li> <li>Fencing costs may not only relate to the fencing of the wetland. Paddock re-configuration may also be required to maintain a logical paddock layout.</li> </ul> <p><u>Question 4 – Should stock exclusion be extended to apply to other animals?</u></p> <ul style="list-style-type: none"> <li>A requirement to excluding sheep will have major cost implications for all Northland farmers, including Pāmu.</li> <li>Existing fences may need sheep proofing.</li> <li>Alternative stock exclusion methods or temporary fencing may no longer be an option.</li> <li>New/replacement fencing to exclude sheep will be more expensive than traditional cattle fencing.</li> <li>Insufficient fencing contractors may lead to increased contracting costs, and inability for farmers to meet exclusion deadlines.</li> <li>This sector is currently under significant financial pressure. Potentially some farmers may struggle financially to meet these requirements.</li> </ul> <p><u>Question 5 – What timeframes are feasible for any new stock exclusion rules?</u></p> <ul style="list-style-type: none"> <li>Phasing in any new rules over the next 10 years would be beneficial for farm planning and financing. Loss of productive land together with fencing, riparian planting, and infrastructure changes, i.e. bridges, culverts and water supply will have financial implications. If farm system change is required then this will take time to develop and implement. Depending on the changes the work may need to be spread over several years.</li> <li>An alternative mitigation to blanket stock exclusion from waterways, could be for the Council to provide for a permitted activity pathway under a Freshwater Farm Plan (FFP). This could determine setbacks, whether fixed or an average, from waterways in each catchment between 3m and 10m and whether to allow for sheep.</li> </ul> <p><u>Other Comments</u></p> <ul style="list-style-type: none"> <li>Under the Resource Management (Stock Exclusion) Regulations 2020 (SE Regs) stock exclusion can be achieved in several ways, e.g. wearables to exclude cattle. It is not clear under the options for stock exclusion whether these alternative methods would be acceptable where cattle would be the only stock needing to be excluded.</li> <li>Any requirement to move existing fence lines will have cost implications, associated with both re-fencing costs and lost productivity/usefulness of paddocks once re-fenced.</li> <li>It is not clear whether the increased setback provision and requirement to exclude stock will be mandatory (as is the case with the SE Regs) or whether resource consent could be sought to reduce the setback.</li> </ul>

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		<p><b>Forestry</b></p> <ul style="list-style-type: none"> <li>The draft rules proposed setbacks to waterways that are not consistent with the Resource Management (National Environmental Standards for Commercial Forestry) Regulation 2017 (NES-CF), permitted activity standards, as amended by the 2023 amendment regulation. This will lead to an influx of noxious weeds within the riparian margins. The costs associated with weed and pest management could be significant given the number of riparian margins created.</li> <li>There is no evidential basis why vegetation clearance should require a resource consent if it follows Resource Management (National Environmental Standards for Commercial Forestry) Regulation 2017 (NES-CF), permitted activity standards, as amended by the 2023 amendment regulation.</li> <li>If the environmental impact is a consequence of harvesting then the proposed plan should reflect that activity instead of planting. Generally, trees, especially native trees, do not damage waterways or water quality. Trees around waterways also provide shading which cools the water, increasing the oxygen within the water which is beneficial for stream health.</li> <li>If resource consent is required to plant within the proposed setbacks the cost of consents may promote larger scale plantings to justify the additional costs.</li> <li>As adverse environmental effects are generally associated with harvesting this would be a more appropriate activity to control to improve water quality.</li> <li>An alternative to blanket setbacks would be to require planting to the naturally occurring drop off that occurs around streams and rivers. <ul style="list-style-type: none"> <li>This would allow forestry to keep to the easily accessible/traversable land with machines and away from waterways.</li> <li>The change in contour would act as a natural bench and contain slash within its boundary.</li> </ul> </li> </ul>
Beth Parker	6 & 8	<p>There is a lot in this draft plan but I'm going to focus on one thing: Fence set back</p> <p>I've read your blurb on why we should exclude stock from waterways/highly erodible land. You cannot argue that it is necessary to exclude stock from waterways and some land. So there you have it.</p> <p>However, New Zealand, like it or not, relies on primary industry, especially commercial farming in order to be part of the Developed World and enjoy all that has to offer.</p> <p>Farmers therefore must be able to farm economically. Your table of figures made it look as there would be little economic disruption. Good old statistics. We all know how they are as pliable as play dough.</p> <p>Most Dairy famers farm in low, wet, drained area as they need grass growth to sustain cows to provide milk we can market as "grass fed" and "green" It is ironic that these green grass fed cows need paddocks, often surrounded by drains,</p> <p>If you set fences back 5 meters from drains and there are drains on 3 side of a 1ha paddock, how much grass do you have left? If you set back 10 meters from the drains how much grass is left?</p> <p>These sort of decisions cannot be made lightly. Not only is there the cost of fencing, there is the economic cost in a drastic loss of grass. There is therefore a loss of cows or the loss of grass fed cows</p> <p>I assume the person reading this says "Yay, no cows, we're saved!" But careful.. careful.</p> <p>If the idea of this is to force Dairy farmers/farmers out of business, then you must replace this business with another commercial venture, not something vague, but something concrete that will bring in sustained foreign earnings. The idea of a beautiful wetland is very alluring. But how do we eat?</p> <p>You could say "OK keep the cows but dairy farmers have to get more efficient- just sort it out, put the cows in a barn, have less cows. Something!" The Dairy farmers are one of the most efficient producers of milk in the world. Our global value is on our happy grass fed cows bouncing around the paddock. If cows have to be kept indoors then that is a drastic shift for the Industry. And it could not happen in the near future.</p> <p>Farmers already accept that we need less cows, therefore more efficient cows that convert grass to milk with a little negative by-product as possible. This won't happen overnight as these are genetic gains, over years.</p> <p>So what to do? Fence set back of 5meters is too much. Old fence lines should be left in place and new fencing alongside waterways should be set 3 meters back. I think that the best thing to do it to retire</p>

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		<p>obvious wet land back to wetlands, rather than struggling on to farm it. I can think of some areas of the Hikurangi Swamp that should never have been reclaimed. This also has to be achieved in a considered way.</p> <p>In our well intentioned rush to save the waterways on our farms also check that they are not already saved. I wonder what the water quality in drains on a farm that does not discharge to water, compares to the water quality in the town creeks? I think we already know the answer to that.</p>
Karen Parker	6 & 7	<p>This proposal is very impractical. There are many different slopes on our property, with different risk profiles. Most of what is risky has been fenced and planted. How will the NRC decide what is highly erodible? there are so many little pockets of slopes across any given paddock.</p> <p>The economic impact to farmers and the region could be huge. It is not just the loss of land and production, but the cost to maintain these areas once fenced off will be expensive.</p> <p>I am concerned that lower production will reduce the ability to pay rates, whilst the increased staffing required at NRC will see rates rise. It just doesn't add up.</p> <p>We class ourselves as guardians of the land and want to do everything possible to look after it. We do not appreciate the over bearing nature of government telling us what is best.</p>
Jeff Parlane	2, 3, 6 & 7	<p>We already have a Fonterra Farm Environment Plan completed. Through that process we have identified areas at risk of sediment and nutrient loss. Having this document is a much more practical way of managing the farm than having to have a resource consent at great cost financially and timewise.</p> <p>Water ways are already retired, these are done with single wire electrics as the nature of the geology the stream are moving through natural erosion processes.</p> <p>In terms of eliminating our discharge to water, we are altering our effluent system to comply with Fonterra term of supply. Through the Farm Environment Plan we feel that our effluent discharge to land would be covered in way that would not result in any discharge to water.</p>
Gary Patterson		<p>Greetings all,</p> <p>I am retired and have little to do with the countryside in general these days, but a shocking discovery of fishing in the Far North is the pollution that flows into Doubtless Bay from the Taipa river that merges into the Oruru river which goes up past Peria to headwaters at Fern Flat road. This river is joined to the Peria river just south of the Peria Saleyards.</p> <p>Considerable discharges of oil is a continuous occurrence and while it is escalated by storm/rainfall events it is not confined to such events. I drift fish and as such wind and tide cause me to meet what I call strings of surface oil every time I fish. We are not talking about huge Exxon Valdez discharges but a stream two meters wide usually about 400-600 or so meters in length. This is a brown oily, sticky, bubbly foam which coats fishing lines and anything else that is reeled up through it.</p> <p>The sea ducks that quite often hang around the back of the boat in anticipation of a crumb or two are very attentive to such slicks and give them a prompt and wide berth.</p> <p>Further my boat, which is predominantly launched from the Taipa river boat ramp, has a permanent stain of oil on it and I wash a considerable amount of oil off it in my driveway after most of my expeditions which again goes straight down the stormwater drain. It is not often that the river is what I would call clean. Clearly a bad pollution in anybody's language.</p> <p>Two questions....</p> <p>What is it, and what can be done about it.</p> <p>There is much history up these rivers and many goods were transported back in the early settler days. No doubt there was also much maintenance done and discharges from truck or similar engine oil changes likely dumped willy nilly.</p> <p>Landfills in that era were far from ideal and who knows what was being dumped or where.</p> <p>What is being done about the location and isolation of such discharges. To my knowledge after a few questions to the council, there is nothing, and I suspect no interest either.</p>

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		<p>I suggest that if you are in the slightest bit interested in cleaning up pollution then this is an excellent example of where to start.</p> <p>I trust this to food for thought for you. Cheers</p>
Ben Pearce		<p>(Hikurangi Pump Scheme)</p> <p>The vision, objectives and/or targets for our freshwater future. This is the general overview of the whole plan and it can unfortunately be undermined by a change in government. This process started while Labour held policies and funding and has now been superseded by a National coalition government which will change each and every response below. Unless the appropriate policies and funding are retained, much of these submissions and decisions will be null and void. That is an issue which needs to be addressed. It appears that many farmers are open to engaging with natural biodiversity restoration on their land <a href="https://newzealandecology.org/nzje/3420">https://newzealandecology.org/nzje/3420</a></p> <p>* Managing highly-erodible land. The proposal to exclude stock from highly erodible land is actually about retaining land cover, reducing silt. One needs to keep in mind that the world's steepest street (at its steepest) is 22 degrees. The proposal to exclude stock from highly-erodible land is based on land which is much steeper than the world's steepest street! Fencing concessions are available for this. Farmers should keep in mind that we are all subject to regulations. Home owners , builders, truckers, we all have to comply with rules and occasion new/different rules are applied.</p> <p>* Eliminating discharges to water. It is not okay to continue to allow discharge to water where contamination is known. The potential to affect others downstream is too great. Water can contain bio-hazardous substances, contagious disease, excessively high levels of contamination, the list goes on. It can easily be mitigated. Recently high levels of nitrate have been discovered in Canterbury, one example of why we must work to reduce discharge to water. Particularly as industrial and agricultural practices intensify.</p> <p>* Managing exotic forests. The cost of wilding conifer control is astounding. This is a direct result of a lack of control surrounding exotic tree farming. Silt control once again could be managed. Discharge to water. This industry has all the negative impacts that this survey is discussing. As funding for the mitigation of these side affects is reduced, it would be hugely damaging and backwards to reduce the requirements of this industry to confirm to safe practices.</p> <p>* Managing impacts on tāngata whenua values. When hapu and Iwi sit at the decision making table you know that they have backed themselves with information, science, cultural impact, concerns for their people and environment. They are out there doing the mahi and involved in their community. Steering groups, resource consent processes and so on all need to allow hapu and Iwi to be involved in the decisions and they need to be listened to not ignored.</p> <p>* Stock exclusion – distance from waterways. This goes in line with our waterways, stopping contamination. Excretion can carry nitrates, disease, parasites, affect water quality, contaminate livestock downstream, affect biodiversity, water uptake, the list goes on. Again, there is funding and schemes for this. Farmers should be encouraged to maintain waterways on their properties, they have a responsibility to their neighbours downstream, it encourages business stimulation as fencing contractors live and spend locally. With Up to 50% fundable, there is plenty of advantage to applying this initiative.</p> <p>* Stock exclusion – highly-erodible land. As above in managing highly erodible land.</p> <p>* Timeframes for stock exclusion rules. Sooner rather than later. Our waterways are testing poorly, they need attention before we have a complete breakdown of biodiversity. Many of our farms on swampland are drainage controlled. These waterways don't have the cleansing natural advantage of rocky bottom or natural environment. It is of particular concern in these areas and a plan needs to be in place that doesn't leave these waterways behind. A plan needs to be suited for ALL water bodies. Including man made ponds, man made rivers and streams and so on. Unnatural water bodies were likely made at a time well before intensification of farming practices and well before our current understanding of our natural environment and biodiversity. Therefore, we need a modern plan that drags these old systems into the 21st century.</p> <p>* Managing water allocation. New Zealand is behind the times and heading down the same paths that other developed countries are now moving away from. This topic lacks NZ based research and what</p>

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		<p>research we do have is often being ignored. Regional councils need to pay attention to hapu and Iwi groups who once again, have done their research, they should not be sidelined in these decisions. Those with the most to gain, that fact does not give them the right to steer these groups or decisions. A greed based philosophy does not apply and it will lead to larger issues in the future. More intensity of water use will lead to greater issues in terms of drought, water quality, biodiversity and so on. Over intensification will lead to greater issues in the future.</p> <p>* Enabling tāngata whenua to practice as kaitiaki for wai. 100% Agree with this. Tangata Whenua are community. While most people are busy with their daily lives, hapu and Iwi are out there looking after the land. Tangata Whenua in a Kaitiaki role is essential. They back their decisions with science, knowledge, practical experience, their voice generally comes from a vast number of people / backing. They absolutely need to be heard and involved.</p> <p>* Support and funding for efforts to improve freshwater. This is good for all. It supports locals in terms of jobs, farmers in terms of offsetting costs, conservation and ecological efforts, hapu and Iwi benefit, nature benefits. it is the bridge that mitigates all parties , done right, this is our path forward. Please don't let us lose sight of that.</p> <p>* Something else. Hikurangi Pump Scheme. This needs addressing with the whole community. Hikurangi pump scheme is paid for by the community no representation or transparency is seen. It is a plan that needs to be inclusive of all NOT controlled by those who seek to Benefit the greatest.</p>
Jim Percy		<p>I am concerned about Council admin costs, that I suspect will be considerable and will simply be added to fees and charges. Where is the budgetary discipline?</p> <p>Landowner compliance costs ( in addition to the aforementioned fees) are likely to be considerable. For little or no social gain.</p> <p>Māori are not the only ones who could do with help with wellbeing. It isn't the NRC's task to be selective.</p> <p>Ngāti Whātua consider their rohe to include the area where my farm is located. But they have not had an iwi presence here since the eighteen twenties, when Te Tirarau Kūkupa drove them out. Who is entitled to the money? Ngāti Whātua? Te Parawhau? Nobody?</p> <p>Water bodies. Who decides what constitutes one, and how changeable are these judgements?</p> <p>Dry wetlands? For pities sake! This oxymoron is unlikely to elucidate a process that encourages land owners to foster wetlands.</p> <p>25% is not steep land.</p>
John & Pam Phillips	4 & 6	<p>We're concerned about the impact of forestry on the water quality in the Northern Wairoa River. The erosion caused by harvest is unacceptable. Rules proposed around new forestry will help, but much tighter controls are needed for existing forestry. Farmers are working their own land day in day out, whereas forestry workers don't have that connection to the land.</p> <p>We have a farm environment plan generated with Fonterra. All farm drains have been fenced partly as a result of this process. Another of our concerns is that these fences would need to be moved out into productive paddocks, reducing our grazeable land.</p>
Murray Pierce	6 & 12	<p>Waterways are already fenced - don't see a need to redo all fencing that's already there, when it is still currently keeping stock away from waterways.</p> <p>The operation of our farm would be heavily impacted by the proposed rules around the 25-degree and above slope rule as our farm is made up of over 50% of slope land. Using the Fonterra Farm Environment plan we are reducing the risks of erosion from our slopes and know that by following these plans we will gain better results regarding water quality targets for our farm. We understand that putting stock in paddocks with slopes that impose a risk during wet periods is not practical for any parties - so this would never be adding unwanted erosion into our waterways.</p> <p>Regarding the Freshwater Plan, if we are required to follow these rules set in place, there should be a help when it comes to covering costs to put these plans in place. This should be a one-off implement, us paying yearly for many things to not change is not worth it. If we are required to plant more trees, or bush land there should be a subsidy to help around the time and cost this put on us.</p>

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		If farmers have to follow rules regarding our waterways it should be in place for everyone, not just certain groups.
Gerard Ponsonby	6	<p>I have 3 streams on our boundaries or running through the property. If you follow through with your proposed plan in some cases there will be a 25 meter exclusion strip so a number of ha will be removed from the farming area and all good productive land. All the streams have been fenced for 10 years</p> <p>If you continue down this path i would expect the Regional council to buy all the fenced areas of the farm . You can pay the rates on it and look after it .</p>
Alice Porter	1, 2 & 7	<p>I believe the proposed new rules for managing 'highly erodible land' including those relating to earthworks and stock exclusions are unreasonable, and inconsistent with the RMA's purpose and principles which are to enable people (in this case land owners) to provide for their social and economic wellbeing (among other things).</p> <p>The approach of mapping topography to identify so called 'highly erodible land' is outdated (maps are dated 2016, thus not reflecting any topographic changes in the past nearly a decade). In addition, it is not fit for purpose given a wide range of factors beyond solely slope angle will contribute to the potential for sediment to enter a waterway.</p> <p>There is significant evidence that the water quality targets this proposed change is intended to meet are unrealistic and again, inconsistent with the purpose and principles of the RMA in that they unreasonably constrain reasonable, appropriate and well established land use that enables landowners to provide for their economic and social wellbeing.</p> <p>The draft rules acknowledge that there are a number of ways water quality can be improved, so surely a more proportionate and measured approach would be to recognise that either riparian planting, or stock setbacks, or exclusion from highly erodible land can improve water quality, and require landowners to apply one of these measures in order to improve water quality, rather than all of them.</p> <p>I strongly object to the assumption that land owners ought to be expected to pay \$10,000s for so-called experts to support the resource consent applications that will be required to support ordinary productive use of their land. Most Northland landowners are small individuals, families or businesses and these enterprises and lifestyles ought to be supported. The practical effect of imposing these obligations is foreseeably that it will become the case that only large businesses head-quartered outside of the region can make productive use of Northland land financially viable, thus contributing to what is already a socially and economically deprived region of New Zealand.</p> <p>It has widely been reported that the stock exclusion based on the land maps excludes 40% of Northland from being able to be used as pasture, thus depriving Northland landowners from being able to use much of their land in a productive way. The nature of the mapping approach actually excludes far more than this as undulations of 25% plus slope angle within a larger area appear to carry a stock exclusion however small they might be, thus practically excluding not only that small undulating area but the surrounding area as well, unless Northlanders are expected to fence off all such undulations that might exist within an area of pasture, which is a complete waste of their time and resources.</p> <p>The assumption that pastoral land can be retired into permanent forests and ETS credits can offset the cost is highly misleading. The significant costs and risks involved in entering land/forests into the ETS would discourage any sensible and properly informed small landowner from entering into that scheme to offset their costs arising from this proposed plan change, as this action would put them at the whim of the government's unfettered ability to substantially change the terms and requirements of the ETS scheme at any time they wish, as was repeatedly the case under the former government.</p> <p>The new coalition government has explicitly stated its intention to review every local and central government regulation affecting farmers and advise central government on solutions (1). It has also committed to repealing the previous government's RMA2. They are doing so precisely to prevent regulations such as this from continuing to send the economically and socially important farming economy backwards. Northland Regional Council has an obligation to work constructively with the government of the day, and to follow the direction of Central Government. It is inconsistent with these obligations for Northland Regional Council to aggressively pursue the policy agenda of the previous</p>

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		<p>government, particularly when the deadline for action under the Freshwater NPS they are relying on to do so is not until the end of 2027. Further, this course of action amounts to an egregious waste of ratepayer funds when the Freshwater NPS will almost certainly have fundamentally changed well before that date.</p> <p>(1)  <a href="https://assets.nationbuilder.com/nationalparty/pages/18385/attachments/original/1694654258/Primary_Sector_Growth_Plan.pdf?1694654258">https://assets.nationbuilder.com/nationalparty/pages/18385/attachments/original/1694654258/Primary_Sector_Growth_Plan.pdf?1694654258</a></p>
Jeannie Poutai		<p>As a member of the public and a Te Tai Tokerau resident, I am greatly concerned about the poor health of freshwater and the urgent need for us all to treat wai with more respect. I am seeking your support and action to ensure that the proposed freshwater plan change and action plan, and the Long Term Plan, uphold Te Mana Me Te Mauri o Te Wai, as a matter of urgency and priority.</p> <p>It would also be good to see Northland Regional Council consider what it has proposed in the draft plan change and action plan along with other ways that things can get done because, delivery by NRC is not the only way, nor the most effective and efficient. The things that are important to me are listed below.</p> <ol style="list-style-type: none"> <li>1. Te Mana Me Te Mauri o Te Wai is fundamental and central to improving water quality in Te Tai Tokerau – we all need healthy water for healthy lives and livelihoods.</li> <li>2. Supporting tangata whenua and communities to undertake actions on the ground – NRC’s focus has to be on enabling community-based action that results in long-term environmental gains and promotes sustainable livelihoods.</li> <li>3. Tangata whenua have been managing their wai and whenua, based on tikanga, kawa and mātauranga – NRC should be supporting kaitiaki and not standing in the way of rangatiratanga.</li> <li>4. We need to change how we think about and treat our wai – we must listen to our awa, repo and roto. Improving the mauri (life force) of wai is a prerequisite to sustainable livelihoods in Te Tai Tokerau. How we use our lands and forests needs to change and NRC’s role is to support and enable landowners to use their lands in ways that result in improvements to freshwater first and foremost. I support giving greater respect to wai as a living entity with a right to be healthy and thrive (legal personhood).</li> <li>5. It is not sustainable to continue enabling land uses that result in declining freshwater health. Flexible and adaptable approaches are needed that support and encourage communities to work together at local levels. Setbacks and stock exclusion policies and rules should come along with NRC support to landowners to sustain alternative livelihoods from riparian margins and highly erodible land which results in environmental improvement and enhancement as quickly as possible. Incentives could be negotiated with financing institutions for loans to support fencing wider setbacks and permanent native reforestation and wetland and riparian restoration. Council should not only consider the economic costs to landowners when considering the actions proposed but also the gains and benefits from improved freshwater health to all.</li> <li>6. NRC budget allocation must consider how service delivery (such as resource consents and environmental monitoring) might be more effectively and efficiently delivered and not assume that it is the council who should be making decisions and managing freshwater. This means also committing to and following through on transferring powers and functions to māori, entering into (and implementing) relationship agreements and contracting tangata whenua direct involvement in freshwater management to name some examples.</li> <li>7. The freshwater plan change and action plan needs to focus on the freshwater needs of our children and grandchildren and not the short-term economic gain of a few. With this in mind, I would like to see climate change, Te Mana Me Te Mauri o Te Wai, empowering our local communities to improve freshwater health and ecosystems at the top of the list for priority action. Ensuring that the health and well-being of wai are put first and foremost in all NRC’s planning and decision-making on freshwater is critical to our ability to sustain livelihoods. Further work on future water demand in light of up-to-date climate science is needed, including consideration of relocation of settlements, kāinga and marae and their future water needs, as well as population growth and migration.</li> <li>8. It is important to me that spending is aligned with Climate Action and proper consideration of ways in which water wastage can be reduced, alternatives that will reduce demand for freshwater takes</li> </ol>

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		<p>(e.g. desalination or cropping choices) and more equitable allocation approaches to the existing 'first come first served' approach must be explored and implemented. I support the proposed targeted water allocation policy which would set aside 20% of any allocation for particular uses such as marae, papakāinga, māori land use, and environmental enhancement. Associated funds generated by applications for other uses should be used to support community-based and hapū led freshwater improvement activities in Te Taitokerau.</p> <p>9. It is also important to me to be able to be part of wider NRC decision-making, beyond providing feedback on the draft freshwater plan change and I request that you keep me updated on what NRC is proposing in relation to freshwater, Te Tiriti, climate change and budget and LTP decisions.</p> <p>10. Mana whenua must be involved in any further development of this freshwater plan change and action plan and the Long Term Plan must include sufficient budget for input from tangata whenua from development through to implementation. The focus must be on supporting whanau, hapu and iwi action on the ground working at the community level to improve freshwater in Te Tai Tokerau.</p> <p>11. The council needs to demonstrate it is taking its Te Tiriti partnership roles and responsibilities seriously and recognise He Whakaputanga and the findings of the Waitangi Tribunal relating to freshwater.</p>
Kylie Poutai		<p>As a member of the public and a Te Tai Tokerau resident, I am greatly concerned about the poor health of freshwater and the urgent need for us all to treat wai with more respect. I am seeking your support and action to ensure that the proposed freshwater plan change and action plan, and the Long Term Plan, uphold Te Mana Me Te Mauri o Te Wai, as a matter of urgency and priority.</p> <p>It would also be good to see Northland Regional Council consider what it has proposed in the draft plan change and action plan along with other ways that things can get done because, delivery by NRC is not the only way, nor the most effective and efficient. The things that are important to me are listed below.</p> <ol style="list-style-type: none"> <li>1. Te Mana Me Te Mauri o Te Wai is fundamental and central to improving water quality in Te Tai Tokerau – we all need healthy water for healthy lives and livelihoods.</li> <li>2. Supporting tangata whenua and communities to undertake actions on the ground – NRC's focus has to be on enabling community-based action that results in long-term environmental gains and promotes sustainable livelihoods.</li> <li>3. Tangata whenua have been managing their wai and whenua, based on tikanga, kawa and mātauranga – NRC should be supporting kaitiaki and not standing in the way of rangatiratanga.</li> <li>4. We need to change how we think about and treat our wai – we must listen to our awa, repo and roto. Improving the mauri (life force) of wai is a prerequisite to sustainable livelihoods in Te Tai Tokerau. How we use our lands and forests needs to change and NRC's role is to support and enable landowners to use their lands in ways that result in improvements to freshwater first and foremost. I support giving greater respect to wai as a living entity with a right to be healthy and thrive (legal personhood).</li> <li>5. It is not sustainable to continue enabling land uses that result in declining freshwater health. Flexible and adaptable approaches are needed that support and encourage communities to work together at local levels. Setbacks and stock exclusion policies and rules should come along with NRC support to landowners to sustain alternative livelihoods from riparian margins and highly erodible land which results in environmental improvement and enhancement as quickly as possible. Incentives could be negotiated with financing institutions for loans to support fencing wider setbacks and permanent native reforestation and wetland and riparian restoration. Council should not only consider the economic costs to landowners when considering the actions proposed but also the gains and benefits from improved freshwater health to all.</li> <li>6. NRC budget allocation must consider how service delivery (such as resource consents and environmental monitoring) might be more effectively and efficiently delivered and not assume that it is the council who should be making decisions and managing freshwater. This means also committing to and following through on transferring powers and functions to māori, entering into (and implementing) relationship agreements and contracting tangata whenua direct involvement in freshwater management to name some examples.</li> </ol>

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Ged & Emma Price	2	<p>As I agree in principle to the erodible land issue but putting a blanket approach to the problem is not beneficial or productive. We would lose approx. a third of our farm under this proposal, in the 24 yrs we have been on this property we have endeavoured to keep stock no's low, use minimal sprays and chemical fertilizers as well as maintain a large bush area between paddock and creek. If we are forced to fence these areas off, on a property that only just manages to pay the rates with the animals that are sold at the market, it would not be viable to farm and the results would be to let it go back to bush and put it into a conservation trust where we would not have to pay as high a rate of rates to the council. Alternatively from what I understand you may still farm on land over 25-35 degrees if you get council consent and if so that is another cost imposed on a struggling sector. The other alternative is to plant out in forestry but that does the environment no good but can be profitable after 30 yrs for the landowner. The council culverts all discharge into the catchment area and are we as landowners going to be responsible and accountable for the road sediment? Ninety-nine percent of farmers look after the land as it is there life and history and as I said at the beginning I do not think imposing a blanket approach to the land is the answer, the land areas need to be assessed on an individual property to property basis. The biggest cause of erosion and sediment run off is the forestry industry. The logging companies, forestry block owners and the council polices need addressing, before chasing the people who care about their land i.e. farmers</p>
Puketū Farming Enterprises Ltd (Terence Brocx)	1 – 3, 5 – 9 & 11	<p>Thank you for the opportunity to provide feedback to the Draft Freshwater Plan Change. I was involved in the formation of the previous plan and am disappointed in the consultation process this time around.</p> <p>This submission covers three broad topics:</p> <ol style="list-style-type: none"> <li>1. Effluent;</li> <li>2. Setbacks; and</li> <li>3. Tangata Whenua provisions.</li> </ol> <p>Effluent</p> <p>I support the concept of no discharge to water. This appears to be an interplay between the farm</p>

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		<p>wastewater discharge to water, and farm wastewater discharge to land policies and rules.</p> <p>The reality of all farmers having no discharge to water, 100% of the time, is impractical and virtually impossible to achieve. This is because Northland has severe weather events and high rainfall. This last winter was an example of that. I live in a high rainfall area of Northland and know the challenges rain causes. I have a consent to discharge with 90 day storage and very rarely do I discharge. If I do it is generally for a short period of time. This scenario is very different to farms that have no Land Application Systems or who don't manage their systems well. These are the people that need to be targeted.</p> <p>Many of the farm wastewater discharge to water consents in Northland expire in 2025/2026. There needs to be a transition time from these consents expiring to when the 'no discharge consents' come into play. The no discharge consents require an increased effluent storage capacity for farms. Transition from current consents to increased storage will require an extension of existing consents as a lead in time. There are not the contractors with staff and capacity in Northland to build quality storage capacity in such a short period of time. I suggest that effluent ponds should have storage for 120 days storage, using the Industry Effluent Pond Calculator, and provision for discharges in an emergency or severe weather event. Farmers are constantly subjected to the whims of the weather and having an emergency discharge consent, with clear parameters and conditions, will provide certainty and a safety net for their businesses.</p> <p>The Controlled Activity Rule C.6.3.1, as drafted, does not provide enough certainty for farmers for farm wastewater discharge to land. The matters of control should refer to a standard that farmers are expected to have for their farm dairy-effluent treatment and disposal system. Effects on surface and groundwater quality, and tangata whenua values and practices, should be limited to the community values as identified through the freshwater planning process.</p> <p>Setbacks</p> <p>The biggest environmental gains that have been made on farms have been where NRC Land Management Teams have been working with Farmers in a collaborative way. This alongside a Farm Plan individualises the unique situations of farm. Blanket rules do not.</p> <p>I strongly recommend that NRC put resources into the Land Management Teams and Farm Plans alongside supporting Catchment groups. Having sound rules that the Team can support will achieve more than creating a consent process.</p> <p>I strongly support Catchment Groups as a means to bringing communities including Iwi together. The Waitangi Catchment Group is an example of this.</p> <p>I oppose the setback requirements in the draft freshwater plan. I make a number of comments as to why, below:</p> <ul style="list-style-type: none"> <li>-If 85% of E.coli are coming from small streams on higher slopes then stock exclusion on these streams is important. The exclusion distance from the waterway should be increased according to slope. This will improve sediment loading as well.</li> <li>-Currently a 3m setback on new fencing and no setback on existing fencing is the rule. I think this could be improved and suggest:</li> <li>-Existing fencing remains. The kick in the guts to the farmers who have done thousands of km of fencing would create an up roar not seen before and would not be fair.</li> <li>-No setback is required on flat or land sloping away from waterway.</li> <li>-3m setback on land up to 25 degrees.</li> <li>-5m setback on land 25 degrees and above.</li> <li>-An average setback is used to match the contour etc on farm.</li> <li>-There is little recognition for the work already achieved. If stock are excluded from the remaining unfenced streams with setbacks then the targets are likely to be met.</li> <li>-The economic data presented by NRC in my experience underestimates the costs. The financial impact will be more and in a lot of cases unbearable on existing farming businesses. Has NRC investigated MPI's Economic Survey of Sheep and Beef Farmers income? I suggest they do so before imposing more costs onto them.</li> <li>-One point that must be considered is that research into sediment retention was not done in Northland where Kikuyu grass is dominant. There is no better sediment trap than Kikuyu grass and any riparian planting would be for shade only.</li> </ul> <p>With regard to Consents For Grazing &gt; 25 degrees: We have Maori Pa sites on our farm with a poor soil</p>

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		<p>type. These require special management to avoid damage in the wet. They provide negative economic benefit and a lot of resource to manage the gorse. Under the NRC proposal I will be required to get a resource consent to farm these. If that scenario occurs I will keep all stock out and no longer put resource into maintaining the aesthetics of the historical importance of these Taonga.</p> <p>Tangata whenua provisions</p> <p>I strongly oppose the recommendations from the Advisory Group because they go much further than the NPSFM envisaged. This includes the policy that sets aside 20% of allocatable water to contribute to the environmental, social, economic and cultural enhancement. I am also very concerned about the ability for this to affect consent renewals. The re-imagining of Te Mana o te Wai as Te Mana me te Mauri o te Wai creates uncertainty for how Northland is to implement TMOTW, and the national bottom lines included in the NPSFM.</p> <p>While I recognise the provisions for Te Mana o Te Wai in the NPS-FM – I find that the interpretation of this in the TWWAG report, and consequent recommendations for the Regional Policy Statement and Regional Plan amendments are over the top and totally imbalanced. Yes we need to restore and preserve the balance between water, environment and people – but it doesn't mean that the mauri of the water is the only priority. We must remember the people and our communities and their well-being. The NPSFM policy 2 states: Tangata whenua are actively involved in freshwater management (including decision making processes), and Māori freshwater values are identified and provided for. Policy 2 does not give tangata whenua a wholesale right to rewrite national direction. Clause 3.4 then sets out how the NPSFM provides for tangata whenua involvement. Again, it is not a chance for tangata whenua in Northland to influence and direct, in the regional plan, how they will be provided for, to the detriment of all other communities in the region.</p> <p>To move forward in a positive way we all as a community (tangata whenua, urban groups, farmers, all other communities inclusive) must work together collectively. An example of this is the Waitangi Catchment Group. Where all sectors of the community worked together creating trust and now are achieving positive outcomes.</p> <p>Historically and currently there are behaviours across all sectors of society that are having a negative impact on water. What has changed is the recognition and motivation to do something about it. Historically there has been a shift in values from disregard to recognition. The challenge is how do we shift to the solution stage. This is happening, just that there is a lot of finger pointing and not enough of self reflection.</p> <p>It appears that iwi have felt that they have not had sufficient influence in decision making by NRC with regards to water. I agree. However, I say this with a caveat: communities have not had enough weighting on their views of which Iwi are an integral part. The Poroti Springs is an example. Iwi claim to have a special relationship with the Land and Water. I don't disagree, but it totally disrespects other peoples connection to the land – especially Farmers.</p> <p>I submit that the objective of the freshwater plan should reflect the freshwater values of the whole of Northland communities, not just iwi. TMOTW already has significant case law and guidance on it. If NRC decides to reimagine TMOTW, as proposed by the Advisory Group, it creates further litigation, costs, and uncertainty for the communities that live in Northland.</p> <p>I agree that water allocation is an issue that should be and needs to be addressed, by both central government and NRC. However, a policy which priorities one group over another is not a positive step forwards.</p> <p>The wai is important to all communities and people. NRC should consider the provisions in the NPSFM in relation to tangata whenua involvement, and I support their involvement with the freshwater plan, but it should be in partnership with all communities in Northland.</p>
Karey Pullman	2, 4, 6 & 7	<p>Wearing two hats, as both a dairy farmer and beef farmer. On our beef farm, steeper slopes are planted in trees but not currently stock excluded. These trees provide shade and shelter, enhancing animal welfare. We would be welcoming of stricter controls around exotic forests, we are impacted when harvesting with sediment loss blocking our main water source where we pump out of the creek - the intake fills in with sediment.</p> <p>On our dairy farm we have a Fonterra Farm Environment plan already which we are using to help identify and manage areas deemed to be of risk for sediment loss. For example, on one side of a race we are fencing and planting areas working downstream from the source as time and finances allow. On the other side of the drain is a race we seldom use. Risks are mitigated leaving the grass unsprayed</p>

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		acting as a sediment/nutrient trap. Steeper slopes in a number of places are already planted out in trees.
Sheree Putt	1, 2, 3, 5, 7, 9, 11 & 12	<p>The fresh water needs to be improved up north due to climate change and the weather as it impacts on our maori culture fresh water is highly important to drink because it is good for personal hygiene and in practice of our tangata whenua I highly recommend fresh water otherwise we can get very sick if there is no fresh water to drink.</p> <p>There needs to be fresh water in for maori people and tangata whenua especially at my family marae up north and enabling tangata whenua to practice good hand hygiene and managing water allocation and to support funding for fresh water at all times especially in the summer time and eliminating any dirty water managing the land and managing the visions of the land at all times especially in the future for our tangata whenua fresh water needs to be changed all the time making it clean for our tangata whenua in the long term.</p>
Rob Pye	1, 6, 7 & 12	<p><b>Economic</b> By introducing the low slope rule to retire land above 25 degree will mean over 250 000ha of hillside removed from grazing. The loss of income to farmers will be huge. Many of these farms have been in families for generations. The loss of livestock from this huge amount of land will filter through both small and large communities. Freezing works in both Dargaville and Moerewa are major employers of many in the town. The flow on effect to the trucking industry, fertiliser companies and all the jobs associated with rural employment will make many of these towns worse off. Most farms have already fenced their rivers at 3m set backs. To have to pull out all that work and move fences back to 7 or 10m would in cases be a huge cost.</p> <p><b>Social</b> We have already seen in the north the impact of farms being sold into forestry. The loss of smaller communities which have been generational has created many issues. The loss of people in these rural areas does affect the wellness of people. By losing 40% of land in Northland to these proposals will be detrimental to the whole of Northland.</p> <p><b>Environmental</b> Current rule of 3m set back works fine. Having just completed (2 years ago) over 5km of river boundary fencing we have found this is sufficient. Each area fenced has had challenges on a meandering river changing course and making fencing difficult in places. A major concern I have with extending the current 3m out to 7m or 10m is not a one size fits all scenario. If we were to move to 7m or 10m not the likelihood of more damage to fencing in our highly floodable land area would negate the positive outcomes you are searching for, especially if you are wanting this to be planted in native riparian plants. There is no evidence to show that leaving in grass is less beneficial to slow the loss of sediment and nutrients into the water. Each farm should have a farm plan to manage sediment and nutrient losses. There are many ways to help slow/ eliminate these losses which could include having catchment ponds before water enters the wai. There should not be a one stop rule for all farms.</p>
Sean Quann	4 – 10	That's a hard no, do not change anything around any of these topics. You are asking for a ton of shit down the track. Or is this just another council virtue signalling tick box of lip service and you do what you want anyway?
Elisabeth Quarrie	3, 4, 6 – 8 & 11	<p>Initially we should just meet national targets instead of setting lofty local goals which will be too much too soon for stakeholders.</p> <p>dairy farms already have invested heavily in fencing all waterways which should be left for a lifespan. now the focus should be fencing waterways for non dairy stock and in hill country. but by leaving dairy country as is without changing setback. by not starting again with dairy land more money will be available for funding this ambitious goal making it more achievable in a shorter time frame therefor achieving the goal of freshwater faster.</p>

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		<p>the national set back is 3m so this should be used for hill country also so that a big difference can be made with sediment but less impact on farmers bottom lines. dairy should be left at 3m for pasture and 5m for annual arable cropping.</p> <p>there is no need to increase setbacks for wetlands which are natural carbon\sediment sinks. these can stay at 3m. the most benefit would come from fencing the currently unfenced waterways to the national standard rather than starting again everywhere with new rules.</p> <p>effluent being spread to land should not need consent as long as rules are being met. why add expense with regulation and bureaucracy when that money could be used to help farmers implement self led fresh water plans...(e.g. funding fencing and planting riparian areas)</p> <p>permanent exotic forests are at best a very short sighted solution and at worst an environmental disaster worse than pasture and ruminants. exotic forests acidify the soil so nothing can grow there and cause pollution in waterways and the death of native biodiversity. harvesting is an enviro disaster and leaving them to die and fall over is no better.</p> <p>initially only the over 35 degrees needs to be addressed as this would make the biggest impact on water and least impact on farmers income. funding should be available for fencing and planting and common sense used over allowing areas for access to other areas of lesser slope etc.</p> <p>involving iwi in all consent needs to be seriously considered. iwi involved in decision making need to be educated so decisions are objective not subjective and certainly not as personal as they could be currently.</p>
John Radich		<p>I have resided at Tangowahine Settlement West Rd for 68yrs. Of that period of time I have been a contractor for 50yrs , the last 20 yrs as an owner operator of an excavator. I have worked on every farm in this area to include; stop banking, floodgates, dams (including building effluent dams) , drainage , land clearing, swamp work , tree removal , etc. I am intimately familiar with all aspects of drainage in this area, in particular Tangowahine No 1 and No 2 drainage districts.</p> <p>I absolutely oppose the proposed freshwater plan change for the following reasons:</p> <p>I see no cost analysis of this proposal which apparently is required under section 32 of RMA.</p> <p>No provision for compensation for land that will be removed from the production cycle or reduction in rates. The economic situation on farming is pretty brutal, under these proposed rules the health and wellbeing of water is put ahead of all other considerations ,including human health and economic security . The uncertainty and vagueness of these new rules and interpretation by councils will have a very negative impact that will go beyond the farm gate.</p> <p>The PM recently cited , NZ agriculture has been persecuted with 23 different rules and regulations over the last 6 yrs that have buried farmers in endless red tape.</p> <p>It's clearly a case of small minded ,officious bureaucrats imposing unworkable rules with little or no understanding of the realities of agriculture.</p> <p>We are not unwilling to make changes to improve water quality ,but are unwilling to be drowned in red tape and extra costs that this ludicrous proposal will bring. I have been a strong advocate of fencing waterways and riparian planting where economically practical and viable . In this area all of the offending waterways have been fenced including council canals. The benefits are obvious and need no further elaboration. However moving fence lines in further will make drainage maintenance a nightmare in particular excavator cleaning and spraying. It's beyond obvious that the person or persons who are proposing these rules are blinded by some unrealistic idealism. Just another case of never owning a pair of gumboots and never wearing any.</p> <p>The idea that one size fits all approach ,this naive idea is beyond ridiculous. After 20 yrs and many thousands of metres of drain cleaning in the Tangowahine area there is one fact I can state and that is each and every farm has its own characteristics regarding contour, runoff from neighbours (Natural servitude) , contour type, soil type, etc . In this area or catchment soil erosion is almost a non-existent issue . However silting in some drainage systems has been observed over years ie. Kumara growing and some horticultural activity and council unsealed roads being the worst . A great deal of difficult low productive contour has been planted in pines or has been left in native cover. The idea of</p>

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		<p>excluding or stopping grazing on steeper ground is ridiculous and impossible to implement with any reasonable costing factor.</p> <p>This proposal will be a huge problem to implement and will be cost prohibitive and will not deliver the outcomes for freshwater. I simply view the whole concept as a failure from the beginning not unlike the laughable ,predator free by 2050 dream and much closer to home the NRC failed Manchurian Wild Rice containment program . The idea of "freshwater" when I look at the Northern Wairoa river is naive and will never happen. NRC needs to embrace the fact that man cannot survive without pollution ,pollution is created every time we produce something good. You are heading down a naive path that is to eliminate pollution is to produce nothing. So E.coli is present in NW river and most likely much higher levels have been present when cowshed waste was directly discharged into river , Dairy Company discharged waste including towns untreated sewage , waste oil and other chemicals dumped down drains and carcasses and rubbish dumped into river. These totally unacceptable activities have ceased, yes damage has been done but i don't see any cost effective approach put forward by NRC. How do you propose to reduce the suspended silt in circuit in the NW river ???</p> <p>NRC needs to focus on the blatant pine planting that is occurring in this region and the valuable ,productive land taken out of production. We have seen the downside after cyclone Gabrielle in other parts of NZ. Are you going to do the usual and in 20 yrs have a draft (or daft) plan? 'Whenua, it matters to all of us'. Ironically , the NRC mission statement quotes ,"Working together to create a healthy, strong economy and resilient communities". I find traction in Colin Hannahs article in Northern Farming Lifestyle; " So ,the new plan completely contradicts this ethos and undermines the very people in the Northland community who help pay the wages of the select few NRC staff trying to railroad this idiocy and bullying through"</p> <p>I fully support Federated Farmers vice president, Colin Hursts viewpoint in a recent article , he highlights the growing concern in rural communities about the way Co-governance of water is becoming a divisive issue. "Under the new regulations regional councils must actively involve tangata whenua in freshwater management, including decision-making processes. What this means in practice is still being worked through, but one aspect that seems to be emerging is the increased use of cultural impact assessments. Where farmers must pay professional service fees for cultural impacts, the impression of a pay-for-play regime starts to emerge-and that doesn't sit right with me. Situations like what has recently played out in Waitaki, with electricity generators Meridian and Genesis reportedly paying \$180 million to smooth the consent path for the consenting of the Waitaki hydro scheme, only add to this perception. The \$180 million included payments to DOC and three south island hapu to redress past damage in exchange for these parties supporting the consent process. I think putting tangata whenua in the position of being asked to be the ones who say 'no' to consent applications risks creating further division in rural communities"</p> <p>It's very clear to see the authors of this "Freshwater Plan " have categorised farmers as villains ,we are seen as an easy target. You are just as responsible as the last idiot government ,feeding the fires of the Rural /Urban division. The common misconception that farmers are environmental vandals ,the only concern being profit. I don't see a 'fresh water urbanites plan' ,whilst you dream up another crippling blow to Northlands rural economy, what exactly has been done to address the Urban pollution issue?</p> <p>It seems to me that the Urban element are blithely destroying a large part of the environment and are being allowed to do so. Facts are being ignored on this one eyed march , when compared to native land cover agriculture yields 2.2 to 9.7 times higher concentrations of contaminants : Urban areas have 3.3 to 30 times higher. I noted an article recently that put up some real figures ; " Dairy farms produce 11 million tonnes of effluent compared with 418 million tonnes by humans ( as opposed to discharging it to waterways). Even when added water is removed , humans are producing 2.5 million tonnes of effluent every year, compared with 1.2 million tonnes from cows."</p> <p>Under normal circumstances I wouldn't bother with a written submission as I do know most of the time they are not looked at. However I am sick and tired of these anti farming campaigns , blaming farmers for a crime they are not committing, viewing the industry as a source of another revenue gathering exercise that will return no visible success. The entirely vague promise that rivers are going to be made swimmable again ??? I recall a comment by an industrial chemist many years ago , don't eat anything caught in Whangarei Harbour.</p>

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Kayla Raines	1 – 3, 5, 6, 8 - 10	<p>Make changes that will benefit asap</p> <p>Exclude stock 5 meters from all streams and waterways.</p> <p>Retire paddocks and plant out in native plants. Species appropriate to regions.</p> <p>Stop all water way, Harbour discharge of human waste and find the resources and funding to use land discharge methods instead. The science is there.</p> <p>Engage with iwi and hapu in each region, allow training and development in their own rohe. Make real change.</p> <p>Train people to be water monitors and rangers.</p> <p>Stop large scale kiwifruit and avocado orchards from taking from water sources, ground aquifers</p> <p>Make better choices</p>
Murray Rawcliffe	12	<p>Any of the above that allow Maori / iwi to have any more say or advantage than the rest of the population</p> <p>Any decision to be made regarding the freshwater plan should be done democratically</p>
Toby Ricketts	1, 2, 4, 6 – 8, 10 & 11	<p>I think it is great that the NRC is considering these changes. Too long have our public waterways been polluted by private enterprise, and a shared resource has been ruined by a small number.</p> <p>Northland is full of very marginal, steep and highly erodible land. You just have to look at our harbours after a rain event to see the plumes of soil and sediment in the water that end up choking our valuable waterways.</p> <p>If these steep, marginal lands were forested, and stock excluded from them, then there would be nearly no muddy sediment run-off, increasing the health of our water, and reducing erosion and the resulting risk of slips from dangerous erosion.</p> <p>These steep and erodible lands never should have been farmed - they are very difficult to farm, and offer very low production compared to more suitable lowlands. Why continue doubling down on the mistakes of farmers' fore-fathers? These practices must stop!</p> <p>Stock should be excluded from waterways as soon as possible, and there should be a decent riparian margin for the effluent to process and be cleansed by the trees and ground before it enters the waterway.</p> <p>Currently, on a hot summers day when you go down to popular beaches such as Coopers Beach, or Cable Bay, you'll see packs of kids playing in pools of river water that is brown, smelly, and unsafe. This is due to one or two farmers in the hills behind not fencing their waterways, or otherwise preventing the run off from their land. Thousands are affected by the actions (or inactions) of a few. This needs to change. It's an embarrassment to have tourists admire our beautiful beaches, alongside brown muddy puddles with the shit from cows in it!</p> <p>If farming these unsuitable areas is uneconomic if they are required to prevent pollution of shared waterways, then so be it! - they must stop farming it. It should not be at the expense of the wider public that these practices continue. They're free to replant in native forest and collect carbon credits instead.</p> <p>Wilding pines are a huge and growing problem. Why encourage planting of pines and other spreadable exotics in unsuitable areas? The log price is an incredibly volatile market, and our environment suffers when these forests are put in the wrong locations. Science needs to inform where is suitable for these forests to be planted.</p> <p>I think empowering certain tāngata whenua groups to act as kaitiaki for our water is a good idea. Structures need to be put in place to make sure that it works and they have funding and power needed to make it succeed. Maori have a vested interest to maintain clean water systems, and that should be recognised.</p>
Harold & Raewyn Robinson	1, 2, 4 – 7 & 10	<p>Our freshwater future should be controlled by NRC in conjunction with rate payers and monitored accordingly. This to achieve improvements over a number of years without huge expense to rate payers.</p> <p>Managing highly erodible land. - It has to be farmed in the best way possible, possibly with sheep and</p>

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		<p>strategic planting of Native trees or Poplars. It should not be planted in Exotic Forest e/g/ Pine trees. We need all our land to produce food for N.Z. and Export.</p> <p>MANAGING EXOTIC FORESTS. There needs to be more control over these land blocks - forestry companies need to do more maintenance keeping pampas, ragwort, tobacco weed, thistles etc at bay and there needs to be a check on this and make sure this maintenance is done. Planting distance from roads and power lines to be increased to 40 meters from roads and 40 meters each side of Service lines as cost of Cyclone Gabrielle has brought to our attention when we have power cuts for 16 days, who picks up the cost and roads are blocked for long periods of time.</p> <p>STOCK EXCLUSION FROM WATERWAYS -- Drains and waterways that do not hold water for more than 3 months should be fenced one meter each side of the centre so the land does not grow unwanted weeds grasses and unwanted trees and become a fire hazard. We are totally against fencing these farm drains to 10 meters as you suggest as this is taking valuable land use away from land owners at their expense on which they pay rates.</p> <p>STOCK EXCLUSION FROM HIGHLY ERODIBLE LAND - Farmers should be able to stock what is appropriate for their land - lighter weighted animals on the steeper land and heavier animals on lower sloping land. Farmers generally want to look after their land and if they are not doing so then, the few who do not look after this type of land should be given advice on alternative solutions.</p> <p>MANAGING WATER ALLOCATION. What do you mean by this? Water collected on farm into dams is the farmers responsibility and should remain so.</p> <p>ENABLING TANGATA WHENUA TO PRACTICE AS KAITIAKI FOR WAI. - We Definitely do not think Tangata whenua should have any control over the water. We are all custodians of WATER as it falls freely from the sky when it rains and no one nationality has any more right to control it than any other person.</p> <p>ELIMINATING DISCHARGES TO WATER. Forestry should be made to have sediment ponds for discharge to water the same as farmers have for effluent discharge. Forestry should be made to clear the land when felling so that the slash does not block the waterways and before replanting.</p> <p>MANAGING IMPACTS ON TANGATA WHENUA VALUES. Maori have no more rights in this country than all the other denominations who settled in this country and cleared the land and made huge gains for our people and made New Zealand the good productive country it has been. So let it remain this way.</p>
Ross Robinson	2, 3, 5 – 7 & 10	<p>We have a farm environment plan that was completed with Ben Herbert from Fonterra. We feel working through this process and using the document to guide our day to day farming operations has helped reduce our environmental footprint. Further regulation such as stock exclusion from slopes or resource consents would be a financial and physical burden to our business with very little change in environmental outcome. This would also apply to proposals for resource consent for land based disposal of effluent. Rather than broad brush rules, the FEP has been written by someone that has actually been on the farm and reviewed critical source areas with us.</p> <p>We have reviewed our water way management and have fenced off the majority of the waterways. With a number of the water ways we try to ensure grassy vegetation at the tops to help reduce risk of sediment loss. Our current stock exclusion from major water ways is set at a minimum of 3 metres, these have been planted or had existing totara already.</p> <p>As 6th generation born in New Zealand, I feel I have every connection to the land as Tangata Whenua. As a landowner, I want to see my investment protected and enhanced so I pass on the land in a better state than when I took it on as guardian.</p> <p>If there are going to be financial costs associated with things like resource consents these need to be shouldered by the general rate paying public. Whilst we have no issue with the desire and the need for improvements to water quality, outright costs such as resource consents should be born by the general public rather than by individual business.</p>
Kara Rosemeier	1 – 12	The proposed changes seem sensible; I do support these measures.
Mike Rowledge	2 – 4, 6 & 12	<p>(Protecting wetlands)</p> <p>Managing highly erodible land.</p> <p>i. New rules required to exclude stock from areas of high/severe erosion risk.</p> <p>ii. Vegetation clearance needs to be limited and earthworks need to be limited in areas of high erosion risk and tighter controls for areas of severe erosion risk.</p>

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		<p>Stock exclusion.</p> <p>i. Setbacks (&gt;10m) to allow for planting riparian vegetation planting, around waterways and to allow space for rivers to dissipate flood energy without problems downstream.</p> <p>ii. Greater control required for streams/rivers in steeper areas.</p> <p>Wetland protection.</p> <p>i. Wetlands need total protection drainage and or clearance.</p> <p>ii. Stock need to be total excluded from wetlands due to damage caused by trampling and effluent discharge affecting water quality at that site and downstream.</p> <p>iii. Policies need to be put in place to encourage wetland restoration.</p> <p>iv. the extent of wetlands needs to mapped and monitored.</p> <p>Eliminating/reducing discharges.</p> <p>i. Prohibit discharge of domestic waste water to waterways.</p> <p>ii. Prohibit new farms discharging effluent discharge to water and to introduce stricter requirements for renewal of existing consents.</p> <p>iii. Dairy effluent discharge to land must be consented.</p> <p>Managing exotic forestry.</p> <p>i. Prohibit clear- felling of forestry in high- risk or steep areas.</p> <p>ii. Exotic carbon and plantation forestry requires larger setbacks from waterways.</p> <p>iii. No resource consents to be issued for plantation forestry in high value dune lake areas.</p>
Darcy Ruddell	1, 2, 4, 6 - 8	<p>If the draft plan were to be implemented as proposed it will mean the end of hill country farming in Northland with the consequent social and economic fallout both on the land and in the urban service towns . At least one of the two Northland meat works would close . The map of stock exclusion areas is an absolute JOKE ,totally impossible to implement in any way with the result being even more vast areas planted in pine trees .Already tens of thousands of ha of Northland have been planted in monoculture pines for both production forest and the economic suicide scheme of carbon forests.</p> <p>NZs trade deficit last year was33.8 billion dollars .Forcing productive farmers out of business because of unworkable schemes with huge compliance costs is just plain stupid .</p> <p>Most remaining farmers have already fenced off bush and wetland areas and planted woodlots on steeper faces they don't need more regulation and cost . Other farms on poor country if not sold for trees are naturally reverting to native scrub or gorse ,i believe the current term is RE WILDING</p> <p>Remember incentivising not punishing will be far more cost effective</p>
Shaun Ruddell	2, 6 & 7	<p>We already have a Fonterra Farm Environment Plan in place which we have identified key areas of risk to water quality, and have taken actions to reduce impacts of our farming operation on the water quality leaving the farm. Building on this document would make more sense to us on a time and financial basis rather than having to look at another plan or tedious consenting process. All water ways are currently fenced with all stock excluded.</p>
Haane Rudolph		<p>As a member of the public and a Te Tai Tokerau resident, I am greatly concerned about the poor health of freshwater and the urgent need for us all to treat wai with more respect. I am seeking your support and action to ensure that the proposed freshwater plan change and action plan, and the Long Term Plan, uphold Te Mana Me Te Mauri o Te Wai, as a matter of urgency and priority.</p> <p>It would also be good to see Northland Regional Council consider what it has proposed in the draft plan change and action plan along with other ways that things can get done because, delivery by NRC is not the only way, nor the most effective and efficient. The things that are important to me are listed below.</p> <ol style="list-style-type: none"> <li>1. Te Mana Me Te Mauri o Te Wai is fundamental and central to improving water quality in Te Tai Tokerau – we all need healthy water for healthy lives and livelihoods.</li> <li>2. Supporting tangata whenua and communities to undertake actions on the ground – NRC's focus has to be on enabling community-based action that results in long-term environmental gains and promotes sustainable livelihoods.</li> <li>3. Tangata whenua have been managing their wai and whenua, based on tikanga, kawa and mātauranga – NRC should be supporting kaitiaki and not standing in the way of rangatiratanga.</li> </ol>

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		<p>4. We need to change how we think about and treat our wai – we must listen to our awa, repo and roto. Improving the mauri (life force) of wai is a prerequisite to sustainable livelihoods in Te Tai Tokerau. How we use our lands and forests needs to change and NRC's role is to support and enable landowners to use their lands in ways that result in improvements to freshwater first and foremost. I support giving greater respect to wai as a living entity with a right to be healthy and thrive (legal personhood).</p> <p>5. It is not sustainable to continue enabling land uses that result in declining freshwater health. Flexible and adaptable approaches are needed that support and encourage communities to work together at local levels. Setbacks and stock exclusion policies and rules should come along with NRC support to landowners to sustain alternative livelihoods from riparian margins and highly erodible land which results in environmental improvement and enhancement as quickly as possible. Incentives could be negotiated with financing institutions for loans to support fencing wider setbacks and permanent native reforestation and wetland and riparian restoration. Council should not only consider the economic costs to landowners when considering the actions proposed but also the gains and benefits from improved freshwater health to all.</p> <p>6. NRC budget allocation must consider how service delivery (such as resource consents and environmental monitoring) might be more effectively and efficiently delivered and not assume that it is the council who should be making decisions and managing freshwater. This means also committing to and following through on transferring powers and functions to māori, entering into (and implementing) relationship agreements and contracting tangata whenua direct involvement in freshwater management to name some examples.</p> <p>7. The freshwater plan change and action plan needs to focus on the freshwater needs of our children and grandchildren and not the short-term economic gain of a few. With this in mind, I would like to see climate change, Te Mana Me Te Mauri o Te Wai, empowering our local communities to improve freshwater health and ecosystems at the top of the list for priority action. Ensuring that the health and well-being of wai are put first and foremost in all NRC's planning and decision-making on freshwater is critical to our ability to sustain livelihoods. Further work on future water demand in light of up-to-date climate science is needed, including consideration of relocation of settlements, kāinga and marae and their future water needs, as well as population growth and migration.</p> <p>8. It is important to me that spending is aligned with Climate Action and proper consideration of ways in which water wastage can be reduced, alternatives that will reduce demand for freshwater takes (e.g. desalination or cropping choices) and more equitable allocation approaches to the existing 'first come first served' approach must be explored and implemented. I support the proposed targeted water allocation policy which would set aside 20% of any allocation for particular uses such as marae, papakāinga, māori land use, and environmental enhancement. Associated funds generated by applications for other uses should be used to support community-based and hapū led freshwater improvement activities in Te Taitokerau.</p> <p>9. It is also important to me to be able to be part of wider NRC decision-making, beyond providing feedback on the draft freshwater plan change and I request that you keep me updated on what NRC is proposing in relation to freshwater, Te Tiriti, climate change and budget and LTP decisions.</p> <p>10. Mana whenua must be involved in any further development of this freshwater plan change and action plan and the Long Term Plan must include sufficient budget for input from tangata whenua from development through to implementation. The focus must be on supporting whanau, hapu and iwi action on the ground working at the community level to improve freshwater in Te Tai Tokerau.</p> <p>11. The council needs to demonstrate it is taking its Te Tiriti partnership roles and responsibilities seriously and recognise He Whakaputanga and the findings of the Waitangi Tribunal relating to freshwater.</p>
Sharlene Russell	2 & 12	<p><b>WATER POLLUTION - GARBAGE COLLECTION</b></p> <p>The WDC (Whangarei District Council) roadside drains along our property (and other properties) always has rubbish in them. We have noticed that cans, plastic biscuit inners, beer bottles, broken bottles, food packets etc are coming from the rubbish collection trucks. The people manning the trucks are throwing the recycle and rubbish at the truck and what doesn't go in is left on the roadside and ends</p>

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		<p>up in the roadside drain which joins up with a storm water drain, then the Waionehu Stream, the Waipu River and as they are all tidal, flows to the sea.</p> <p>I am very concerned at the plastics and other containers, some of them with toxic contents (garden chemicals) going into the waterways. Maybe it is time to upgrade trucks and bins so that this can be avoided.</p> <p>MANAGING HIGHLY ERODABLE LAND</p> <p>Part of the WDC roadside drain flows into one of our paddocks causing erosion. We have contacted the WDC and they advise that they can't find records of the drain meeting up with a storm water drain which borders our property and flows on to the Waionehu Stream, Waipu River and sea as above and therefore are not required to re-connect it. During heavy rain the WDC roadside drain floods our property causing erosion to the stormwater drain.</p> <p>At some point in the past a culvert has been constructed over the stormwater drain and possibly blocked the WDC roadside drain causing the water to flow into our property. The property has been in family ownership since 1893 and erosion has only been a problem since this culvert was built. The refusal of WDC to connect the roadside drain to the stormwater drain I feel is irresponsible and reckless. We are doing our bit by planting natives along the rest of the storm water drain to try and retain land.</p> <p>I have photos but are unable to attach them.</p>
Nessa Ryan-Andersen	10	<p>I don't believe it is democratic to give tangata whenua additional input to the management of water over the rest of the citizens in Northland. I do not believe their kaitiaki is necessary, qualified or fair. I would prefer an approach that is scientifically designed to better the environment and not based on cultural manifestations of maori.</p>
Rosie Sanford	1 – 3, 6, 7 & 8	<p>My first impressions:</p> <p>Firstly, I am incredibly astonished to see just how much Maori have been embedded in this policy, right down to the discussion document prepared for Te Mana me te Mauri o te Wai, prepared and released by Tui Shortland, current Chair person of NRC - perhaps a conflict of interest arises here?</p> <p>There is perhaps a lack of common sense flowing through New Zealand currently in relation to the impact so many new laws around environment and fresh water will pose on food production.</p> <p>The approach from NRC, under Government directive, directly impacts on the cost of food production, which is covered in Article 2(B) of the Paris Agreement. The stance you are suggesting contravenes this act. Whilst this is put forward as a "water issue" the ramifications reach far further.</p> <p>I don't think too many Central, Regional and Local councils (and their staff) realise just how much has been done by the farming communities working towards a cleaner and greener country and the expense it has cost in fencing, planting and retiring land.</p> <p>One may well challenge the differential treatment of farmers and Iwi and their land holdings which raises concerns as to the validity of the kaitiakitanga of some of the Iwi land as double standards, where you see no fenced waterways for stock exclusion, invasive weeds like gorse, blackberry, tobacco and wattle trees. It would seem there are different rules dependent on the race you belong to. Treat everyone equally.</p> <p>And to all those iwis who have done the right stuff - well done!</p> <p>As kaitiaki o te whenua, I take great care and pride in doing the best I can to keep the whenua and wai as healthy as possible, and mitigate as much as I possibly can to ensure their hauora is kept better than I received it.</p> <p>I disagree with wider setbacks on existing fencing and planting. If increased they will only encourage noxious weeds and vegetation to grow, clogging and restricting water flows, causing an increased risk of flooding and sediment being lost if vegetation is ripped away. Existing FEPs has already addressed stock exclusion and fencing around waterways. The existing fences must remain the same.</p> <p>Maps are inaccurate and out of date. Updates are required. Just looking at a google map does not give an absolute clear picture of the area and surrounds. ....</p> <p><a href="#">Fresh water plan pg 2.docx (14 KB)</a></p>

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		<p>I submit the following on your Draft Fresh Water Plan</p> <p>Slopes – you are drafting rules whereby you have identified as high (yellow) and severe (red) zones and you want stock to be excluded from both these area types. The scenario I put to you is this:</p> <p>If a farmer farms a 200ha property and you identify 20ha that fall into the above exclusions for slopes, will you be paying the farmer for loss of land, loss of income – and income being paid perpetually?</p> <p>I bring you attention as to the costs relating to your rules which sees 20ha removed from a dairy farm as follows:</p> <p>Scenario: Dairy land currently selling for \$27-28k /ha – value \$560k</p> <p>Decrease in stock numbers – current stock rate 2cows/ha = 40 cows with a production value of 380kg of Milk solids @ current milk price midpoint of \$7.50/kgs = value \$114,000 / annum Which is variable – dependent on milk price.</p> <p>So, in this scenario you are seeking to take land and income away permanently. The loss to a farmer is going to be exuberant, and no farmer will sustain what I would call theft of this magnitude.</p> <p>Should this plan go ahead as you have drafted, then many farmers would be seeking legal advice for payment from the crown for land and loss of production perpetually.</p> <p>This is just one example of what you will be taking away, but you already know that by identifying the land subject to exclusion.</p> <p>In many cases erodible land is only lightly stocked, and waterways are already fenced and planted.</p> <p>My main point is that – Loss of freehold land and income will not be tolerated.</p>
Carl Savill	1, 2, 5 - 9	<p>The Far North Regional Council Draft Fresh Water Plan proposed changes are absolutely ridiculous and show that the council has lost touch with reality. The proposed changes are unfair, expensive, stupid and unworkable. How pathetic that a council whose job it is to help Northland thrive would put such an attack on the community that pays for their existence.</p> <p>I strongly disagree with all of the changes proposed and support the status quo. retaining current legislation. I disagree with the 25 - 35 degree slope high erosion risk and the 35 degree slope severe erosion risk. When I look at our farm map, I see a huge number of tiny areas that would require stock exclusion and this is entirely impractical and unworkable and the financial cost unbearable. These areas on my farm map have been farmed for over fifty years and are not suffering from erosion. I am very careful how I farm the slopes, so not to effect the environment. I have a strong connection to the land and would not undertake activities that would damage my farm. Most farmers I believe are the same. I see that my neighbours would also face this crippling rule proposal with hundreds of tiny areas requiring stock exclusion. If there are to be stock exclusion areas surely a minimum acreage should apply i.e. minimum area 50 acres. With regards to set backs I support the status quo. my second choice is the 3 metre set back which wouldn't apply to all ready fenced existing set backs. I disagree with the stock exclusion rule applying to what the Council has mapped as highly erodible land as this blanket approach does not take into account even the basics such as soil type and animal species and vegetative ground cover. People have been managing their own properties, by enlarge, well and they do not need or require interference from the council to do so. As I do not support any of your changes I also do not support your proposed time frames. I disagree with the targeted water allocation policy because water is essential for life and all people must be treated evenly and fairly as a basic human right. No special allocation, no specials funds. Any policies should not distinguish and separate people based on ethnicity and race. Northland does not have a water issue, it has a water storage issue, most of the water that falls on Northland as rain goes out to sea, a smaller percentage leaves by evaporation and a tiny percentage is captured and used. Therefore, we see that we must be smarter on how we capture water and then we will not have a shortage. There is no doubt that if the proposed changes go ahead they will cripple Northland, reduce incomes and destroy the Northland economy. It will negatively effect our small towns, villages, farms and business's in a region that generates 1 billion of export revenue annually, the stock exclusion proposals could chop 30% of income from a region that is already dealing with hardship would be untenable. Reduction of one and a half drystock units over 250,000ha of slopes above 25 degrees would add up to \$270m of lost meat income annually. To fence off these areas could possibly collectively cost the region a further \$720m to \$1080m. This is simply not affordable.</p>

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		In finishing I would like to express my huge disappointment in the Northland Regional Councils Draft Fresh Water Plan Change because it is ridiculous, unfair, unreasonable, expensive, stupid and unworkable. It would destroy the Northlands economy and community.
Jason Semenoff	1, 4, 6 – 8	The stock exclusions from drains should be short enough for digger to clean out drain/stream . Stock exclusions from steep land if it slips maybe needs to be excluded from grazing Gabriel rain event most people know which areas slip. Time frame stock exclusions 2035 at the earliest lot of work to be done . Manage exotic forests if they gonna exclusion steep areas payments must be made and carbon credits paid better for natives .
Cameron Shanks	2, 6 & 7	Looking at the proposals for stock exclusion we have a farm environment plan already which covers the sensitive areas on farm.  Using this instead of expensive resource consents would be a much more practical solution for our farm and the majority of Northland dairy farms.
Sandra Sheard	7	My farm has 7km of river boundaries (2 rivers). Just over 2kms I am on both sides of the river. 4.9kms I am on one side of the river only.  My original farm has had the rivers fenced for many years (probably as much as 50 years).  My new farm purchased in June will be fenced this summer (partly from a NRC grant, thank you).  Our fence set backs are from 3mtrs, to in some places, as much as 15mtrs depending on the river. I have no problem with a minimum of 3 meters stipulated but I think it should be up to the farmer as to where they put their fences and I don't think the council should be increasing the set back size.  I believe the responsible farmers will fence their properties. My main concern is the other "farmers" that don't/won't fence their properties. We have wandering horses a lot of the year (our fences keep them out of our property but they roam the rivers at will) and we have a neighbouring beef farmer who's cows are often on our side of the river.  I have asked the question to an NRC employee who said from the 1st Jan 2025 that we will need to ring every time there are cattle in the river. Does the Council have the resources to deal with daily calls? The owners don't care where their horses/cattle are now and they surely aren't going to pay any fees that NRC might fine them. They can't afford the fees let alone the fences. And how are Council going to identify the owners of the horses, its not like they have NAIT numbers!
Kara Shortland	12	(The approved use of water tanks in urban residential zones to contain excess rain water for the purposes of washing, toilet use, laundry and external purposes)  If you want to seriously consider the management of fresh water contained by our town supply; and the management of excess water from rain then NRC needs to be serious about considering the approved use of water tanks in urban residential zones to contain excess rain water for the purposes of washing, toilet use, laundry and external purposes.  This will help manage the town fresh water supply; contain surplus water from over flooding our town, and provide a necessary backup in the event of water shortage or water outage.  This will also require a capable and reliable source of funding for householders.
Andrea Sim	1	I support the vision and targets as outlined in your plan.  It is a matter of urgency and should be actioned as soon as practical and reasonable for affected parties.  Where individual parties have challenges implementing the changes within a specified time, you could have a mechanism for consideration on a case by case basis.
Veronica Simpkin		I begin with two general observations.  1) Covid demonstrated that the New Zealand economy needs a viable farming industry. Without it there would be no money to employ the people who service the various needs on the community, eg. Health, Education etc.  2) Conservation is the luxury of the affluent. No one who needs every dollar to stay alive opens a savings account.

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		<p>On this property I have preserved considerable areas of native bush, which includes four blocks covenanted under the QEII National trust at the cost of many thousands of dollars. This was only possible in years when a cash surplus allowed such expenditure that has no financial return. Looking at the NRC draft plans I could see those provisions removing any cash surplus for such work, if not driving the operation into bankruptcy.</p> <p>This farm came through Cyclone Gabrielle with very little slip or erosion damage mainly due to a 50 year catchment planting programme.</p> <p>Unlike many other sections of the community, farmers only get paid when they produce a saleable commodity.</p> <p>Looking at the NR plans I see large amounts of money and effort being used to comply with regulations.</p> <p>I think the kind of advisory assistance available in the past from soil conservation staff would produce more co-operation and a better result.</p>
Clint Sirl	5 & 10	Racism has no place in the future of our water. All New Zealanders should have equal say in all water matters. Tangata whenua should not have special say on water matters and practice of Kaitiaki of water is a race based policy.
Anthony Smallman	7	<p>A high percentage of our farm that is steep, but very stable (volcanic). Our farm is relatively small (84 ha), we will be reliant on its income in our pending retirement years, the proposal could force us off the property and greatly reduce its saleability and value, if steepness is the only factor applied, for stock exclusion. We have worked too hard for too long to lose our life savings and property to this proposal. Our steep country is not near waterways. A blanket rule approach that does not allow for collaboration and input from land owners for their specific properties will be a disaster for Northland. Your "cost of change" estimates, appear to be too light, they don't account for the possible scale of effect on some properties. averages won't work for costings, they have to be applied on a case by case basis. i.e. a heavily affected property could be rendered uneconomic and lose its saleability as a viable and marketable business proposition.</p> <p>This stuff is frustrating and scary, these plans affect people's lives and wellbeing, the govt seems to think all rural landowner have endless resources. while urban landowners collectively discharge polluted runoff into our river systems, with no individual cost accountability.</p>
Greg Smith	1 - 11	<p>Frankly, there is not a single part of this that is good. Every single item is deeply flawed, racially charged, likely to create and/or exacerbate societal problems, and will be problematic for the economy. There is also strong potential for rights to be infringed, if not eroded entirely.</p> <p>It appears clear that these things are not unintentional, but rather that they are the objective. Having spent many years living and working in, and traveling through, Communist nations, I am familiar with the methods these nations traditionally employ, and I see precisely those methods at play here.</p> <p>Every part of this Plan is dangerous, and I can only urge you to reject it in its entirety. I also know you won't because there are interests greater than mere ratepayers at work.</p>
John Smith	1 – 3, 6 – 8 & 12	<p>(Freshwater Plan vs Farm Environment Plans)</p> <p>There are a few issues with the proposed plan change, in particular the lack of scientific evidence and the assumptions made.</p> <p>Keeping stock out of waterways. A couple of points:</p> <ul style="list-style-type: none"> <li>- NRC currently monitors around 55 sites for river water quality (as per published on LAWA). Very few, if any, of these monitoring sites are in steeper areas - where is your evidence that streams in steeper areas contribute a lot of sediment and E. coli?</li> <li>- The national standard for stream setbacks in 3m. Why should NRC be any different?</li> </ul> <p>In addition, NRC's assessment fails to incorporate slope in its scoring. For example, a stream adjacent to flat land will have less sediment run off compared to a stream adjacent to sloped land. Therefore fencing a stream on flat land by 3m or 10m will have less impact on sedimentation.</p>

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		<p>I have concerns around the evidence base for such blanket restrictions, alongside the costs estimated for the proposal.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- That NRC implements water quality monitoring programme in upper catchments and steep areas. Review results and formulate policy based on the scientific evidence.</li> <li>- That NRC adopts the national standard for stream setbacks.</li> </ul> <p>Protecting erosion prone land</p> <p>I have real concerns around the evidence base and maps which are used to capture certain areas of the region. The proposal lacks scientific evidence and assumes that slopes greater than 25 degrees are erosion prone. Erosion prone land is due to a number of contributing factors, such as vegetation type and cover, soil and geology, climate (eg rain intensity and regulatory). To assume land is erosion prone based on slope alone is a very basic assumption.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- That NRC maps erosion prone land based on vegetation type, vegetation cover, soil, geology, climate, slope, etc... - similar to the LENZ land environment mapping undertaken by Landcare Research. Based on this mapping and assessment of erosion susceptibility, formulate policy based on scientific evidence.</li> <li>- That NRC includes a limit of the number of stock units that can be grazed in the scientifically identified erosion prone areas, as it is the number of stock in an area at one time that can increase erosion. e.g. one or 5 cows on a 25 degree slope compared to 50 or 200 cows on a 25 degree slope.</li> </ul> <p>The other point I would like to make is duplication/replication between the freshwater plan and farm environment plans. Farm environment plans require fencing of waterways, identification and mitigation of critical source points, erosion areas etc.. FEP's are certified, audited and updated every 18 months to 3 years. Farmers are already doing what is proposed in the NRC proposed freshwater plan through their FEP, but the proposed freshwater plan add the cost of a resource consent to graze one cow on a 25 degree slope in addition to the cost of a FEP.</p> <p>The freshwater plan will lead to additional and unnecessary cost and consent requirements that fail to reflect farmers extensive and continued work to improve the overall environmental sustainability of their land and community catchments.</p> <p>The options NRC is proposing are more stringent than existing national regulations for the region and NZ. A lot of which are in addition to existing requirements set out through national legislation.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- NRC to work with farmers to achieve the already-identified requirements of individualised FEPs.</li> <li>- NRC to strike a good and reasonable balance of addressing Northland's water quality challenges – and an efficient, effective, and achievable timeframe in which to implement.</li> <li>- NRC to use existing FEP tools to describe and outline required on-farm practices to mitigate negative environmental effects on waterways.</li> </ul>
Richard Smith	2, 6 & 7	<p>All drains are already fenced off with good pasture growth under fence lines which prevents runoff into waterways. We engaged with KMR to help us fund the fencing off of water ways.</p> <p>We are currently also actively planting retired lands. Concerns over the proposed rules over highly erodible land usage and the slope. This would impact our business and the way we farm.</p> <p>We have completed a FEP with Fonterra which has helped us to reduce the risks of erosion from slopes.</p>
Shane Speight	10	<p>I'm irritated that local govt think that water is important only to iwi groups. How did this happen that iwi groups get special representation and some control over water. Where is all the Maori infrastructure that they built for water control?</p> <p>Water is critical to all of us, all of us, it cares nothing about race.</p> <p>Only govt and local govt are dividing this country up by race.</p> <p>The Waitangi treaty has no reference to co governance or special Maori rights over water.</p>

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		We should all be treated equally with the same value. If any group is going to have control over our water, it must be an elected group representative of regional council ratepayers.
Ian Steele	1, 3, 6 – 8 & 12	<p>(Help with fencing water ways)</p> <p>The fencing of water ways is just not good. With having a current plan of only having to fence drains and water ways that are only five metres above high tide is a joke. We have fenced off drains on the lower parts of our farm which keep cattle out but not sheep. On our higher country we have some steep hills that all run down into drains at the bottom which flow into Parua Bay. This country we have sheep on, when it rains, is that the sheep shit is very mobile and washes down the hills into the drains straight into Parua Bay. If the drains in these valleys were fenced, the shits would be kept out of the drains. The harbour would be a lot cleaner. The time frame for this should be over a five year plain with a fifth of the drains fenced every year or sooner. Also the type of fencing has to change to a Netting fence with no batons fewer posts but with an insulated wire along the top that can be electrified to stop cattle pushing over the top. If the council came up with some financial assistance it would get done sooner. This type of fencing is much cheaper and easier to erect, especially on steep country. If we have this problem, it must be the same all over Northland</p>
Ari Stevens	1 - 11	<p>I am writing to offer my full support for the proposed changes outlined in the draft Freshwater Plan Change for Te Taitokerau. These proposed measures signify a crucial step towards safeguarding the health and sustainability of our precious water resources, and I commend the council for taking proactive steps in this direction. The key items being explored in the draft plan resonate strongly with the environmental challenges facing our region, and I believe that their implementation is vital for the long-term well-being of our waterways. Allow me to articulate my support for each item:</p> <ol style="list-style-type: none"> <li>1. Protecting erosion-prone land: I fully endorse the proposed rules aimed at limiting vegetation clearance, land preparation, and earthworks in areas vulnerable to erosion. These measures are essential for preventing sedimentation and maintaining the ecological integrity of our streams and rivers.</li> <li>2. Keeping stock out of waterways: The importance of keeping stock away from waterways cannot be overstated. I am in favour of wider setbacks for stock and enhanced riparian vegetation, as outlined in the draft plan, to mitigate the environmental impacts associated with livestock farming.</li> <li>3. Eliminating or reducing discharges: I support the stringent controls proposed for various types of discharges to freshwater. It is imperative to minimize pollution from sources such as dairy effluent and stormwater runoff to ensure the purity of our waterways.</li> <li>4. Protecting wetlands: The preservation and restoration of wetlands are critical for maintaining water quality and supporting biodiversity. I endorse efforts to increase wetland area and enhance the health of existing wetlands across Northland.</li> <li>5. Control of exotic forests: The proposed rules for exotic forestry management align with the need to protect sensitive waterbodies and mitigate sedimentation. I support the requirement for larger setbacks and resource consent in high-value catchments.</li> <li>6. Expanding requirements for assessing impacts on cultural values: Recognizing and incorporating Māori values in freshwater management is paramount. I applaud the commitment to involving tāngata whenua in decision-making processes and assessing cultural impacts.</li> <li>7. Allocating water: Setting aside water for environmental enhancement and supporting Māori aspirations reflects a holistic approach to water allocation. I endorse the proposed policy as a means of promoting the well-being of both waterways and communities.</li> </ol> <p>In conclusion, I urge the Northland Regional Council to proceed with the adoption of the draft Freshwater Plan Change, incorporating the valuable feedback and perspectives of stakeholders. By implementing these measures, we can ensure a sustainable future where our waterways thrive, supporting both ecological diversity and human well-being. Thank you for considering my input on this crucial matter.</p>
Grant Stevens		<p>I have lived in Northland for almost 50 years, and as a practicing civil engineer, and keen kayaker, I am very aware of water quality in our rivers and marine environment.</p> <p>I am very supportive of any plan policies and rules that will improve water quality through reduction in sediment and animal pollutants in the rivers.</p>

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		<p>The current water and soil plan rules and compliance regime, have achieved no improvement in water quality over the last 40 years as evidenced by:</p> <ul style="list-style-type: none"> <li>- Sedimentation rates in the Hatea River/Whangarei Town Basin have remained constant, resulting in the need for expensive annual dredging. The Whangarei Marina managers currently spend nearly \$200k per annum on maintenance dredging</li> <li>- Recent logging of the Northland Regional Council forest at Waikaraka resulted in a significant deterioration of water quality in the Waikaraka stream and adjacent harbour foreshore. <i>The attached photos</i> show the Waikaraka Stream after heavy rain on 23/9/2021 and the consequent silt flow into the harbour which dispersed around Beach Rd on the incoming tide.</li> <li>- Kayaking in the Wairua River remains hazardous to health due to effluent laden runoff from the Hikurangi catchment.</li> <li>- Northlands only swimmable rivers are contained within the native forest catchments such as the Puketi and Waipoua forests.</li> </ul> <p>I note that the proposed changes are well supported by local Northland research. I submit that this research should be continued to develop effective methods by which forestry( harvesting )and farming can continue on Northlands Highly Erodible soils.</p> <p>NRC can then facilitate such methods with farmers and foresters to lessen the economic impact of the necessary land use changes.</p>
Pamela Stevens	1 – 3, 6 – 8 & 11	<p>I would like to definitely express my support for the Northland Regional Council Draft Freshwater Plan and have read and agree with all the plan changes . I grew up in the farming area of mid Canterbury in the 1950s. I was really shocked when I returned many years later. The rivers were no longer swimmable; the creeks were not flowing.; It had dramatically changed from small family farms, clean rivers, schools, halls and communities. Shelterbelts had been cut, huge irrigation arms sprayed water all day in the heat of the sun, there were enormous paddocks and herds, patches of bush and local house water supply had disappeared. Braided rivers have been channelled, flood plains farmed, wetlands completely disappeared that had in the past dealt with extreme rain events.</p> <p>Northland as a region has its own unique challenges climatic, geological and economical. We now have generational experience and far better scientific information so that we do not make the same mistakes . The Northland Regional Council, on our behalf, needs to ensure that they safeguard and improve the health of freshwater and all ecosystems. The flourishing Landcare groups and the proliferation of teams of local volunteers are testimony to the high value residents of urban and rural areas put on water quality. The farming community in particular, needs to be supported not only by the local community, but by all of the departments of the Northland Regional Council. They have the expertise and experience so that ecosystems on marginal land can be transitioned successfully to a more sustainable future. Highly erodible land and stock exclusion zones have been signalled for a number of years and are no surprise to anyone. However as well as advice, financial support will be needed to meet the deadline of "within a generation"</p> <p>I wholeheartedly support the Draft Plan which is required to meet the National Policy and support the Northland Regional Council in its overview role of ensuring accountability so we improve freshwater health which in turn improves the lives of local people and also ensures the downstream long term improvement of our coastal waters from reduced runoff and pollution.</p>
Jessica Stewart	6 – 8 & 11	<p>I would like to strongly oppose what I have read of the freshwater draft plan. It looks like just a way to force more farmers in to becoming pine tree farmers. Is that really what we want for Northland, and will that be what's best for our water ways when all the trees start getting harvested?</p> <p>I also would like you too consider that as dairy farmers we have already fenced off our waterways as per your specifications (which I do agree is not enough for establishing planting) but it was you guys who and some so called "experts" that came up with the specifications, so what is to say you making us tear those fences down and move them back again at our own time and cost is going to make any difference this time around?</p> <p>In our case the Manganui river borders our farm length ways and floods too often to establish any planting at all. So we are working with KMR to fence and plant our gullies instead. Which I think is a far</p>

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		better long term approach to water quality, and planting natives feels a lot more sustainable than pine trees. Having individual planning for farms instead of blanket rules would be a far better approach. Also I would like to add that where dairy farmers had to have our fences checked, there's a lot of creek ways around our parts that aren't fenced off at all so maybe making beef and sheep farmers who haven't done their fences yet actually do them and at 5m back, and as fences need replacing they should be set to new regulations at that time of 5m.
Summit Forests New Zealand Limited (Chayne Zinsli)	2 - 4	<p>Thank you for the opportunity to submit on the draft Freshwater Plan for Northland.</p> <p>Summit Forests New Zealand Limited (SFNZ) is a New Zealand registered subsidiary company of Sumitomo Corporation, Japan. In 2013, SFNZ purchased the former Juken New Zealand Ltd forest estate (36,000 ha) in Northland. All the existing local staff and contracts were transferred across to the new company and brought with them more than 24 years of local experience in managing the estate. Since that initial purchase, SFNZ has continued to expand its forest estate with purchases in the Whanganui and Tairāwhiti/Gisborne regions as well as in the Coromandel. These purchases have made SFNZ the sixth largest forest owner in New Zealand with some 49,594 ha of plantation forest. Approximately 20% of our total estate are areas of indigenous vegetation and SFNZ is actively restoring high conservation value areas in its forests along with and supporting local community conservation projects.</p> <p>SFNZ have a number of concerns over the draft rule changes but are specifically concerned over the changes to C.8 Land Use / Disturbance and, in particular, C.8.3 Earthworks and C.8.4 Vegetation Clearance. We have worked with the Northland Wood Council (NWC) on a submission on the draft Plan Change and are lodging this submission in support of the NWC submission. The NWC submission provides the detail to our concerns which can be summarised as:</p> <ul style="list-style-type: none"> <li>•The rules of the draft Plan Change will have significant economic impacts on the Forest Industry, its downstream supply chain, and the wider community;</li> <li>•The rules as they relate to forestry are not evidence based;</li> <li>•The rules as they relate to forestry are not fair, reasonable, or practical;</li> <li>•The rules as they relate to forestry are likely to render interests in land incapable of reasonable use; and</li> <li>•Will result in unintended consequences.</li> </ul> <p>SFNZ believes that the National Environmental Standard for Commercial Forestry provides a comprehensive and nationally consistent framework for managing the environmental risks associated with commercial forestry that the Council can rely on without the need to introduce a new suit of rules that are unlikely to be efficient or effective.</p>
Warwick Syers	1 & 6	<p>I live on Headland Farm Park which comprises a farming lifestyle block of 80 private residential sections and a little over 50ha of rolling to steep pasture running 250 breeding ewes and about 60 heifers</p> <p>My greatest concern is that although not disclosed in the draft paperwork, NRC will surreptitiously include sheep in the final changes. At present, it is following the status quo of essentially only including cattle, pigs and deer, for which two wire fencing so sheep can move under the wires to graze up to the drain edges. To include sheep will be prohibitively expensive for both ratepayers and the farmers with no absolute certainty that it will totally achieve freshwater.</p> <p>I believe that the 3m setback should remain without extending it.</p> <p>The existing freshwater legislation encompasses the Resource Management (Stock Exclusion) Regulations 2020 which does not include sheep. It is my very strong view that this national regulation should continue to be followed by Regional Councils throughout NZ rather than more onerous conditions being imposed.</p> <p>To determine the progress to date from the 2020 regulation, the time frame is far too short to gauge the outcomes achieved. Further, during that time, the excessive rainfall of 2023 would skew any actual measurements. So, the long-term benefits of the 2020 implementation does not give a true representation of the benefits achieved. Before any changes are made, sound statistical bases of what has presently been achieved should be ascertained.</p>

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		<p>To try to be finding utopia for pastoral fresh water really is a myth. There will always be some form of pollutions occurring in bush and pastureland. It is just nature. Yes, removal of pollution from larger livestock like is being achieved with the present regulation is very worthwhile but some degradation does need to be accepted as the cost of absolutely pure freshwater is too prohibitive and cannot not be justified.</p> <p>I believe that the farming contribution to NZ export receipts, the jobs provided by the industry and utilisation of the land should not needlessly be jeopardised by excessive regulation which it appears, is happening here. Whilst green ideas are worthy, they cannot be applied absolutely to the cost of everything else. A balanced position is essential.</p> <p>Far greater emphasis should be on forestry slash eradication than draconian legislation threatening the farming industry by trying to achieve an impossible goal of absolutely pure pasture fresh water.</p> <p>The steps taken by the farming industry and the buy into pollution eradication by them, will continue to improve water quality with no need for extra legislation and regulations around fresh water.</p> <p>I ask that you leave things at the present status quo.</p>
Rowena Tana		<p>As a member of the public and a Te Tai Tokerau resident, I am greatly concerned about the poor health of freshwater and the urgent need for us all to treat wai with more respect. I am seeking your support and action to ensure that the proposed freshwater plan change and action plan, and the Long Term Plan, uphold Te Mana Me Te Mauri o Te Wai, as a matter of urgency and priority.</p> <p>It would also be good to see Northland Regional Council consider what it has proposed in the draft plan change and action plan along with other ways that things can get done because, delivery by NRC is not the only way, nor the most effective and efficient. The things that are important to me are listed below.</p> <ol style="list-style-type: none"> <li>1. Te Mana Me Te Mauri o Te Wai is fundamental and central to improving water quality in Te Tai Tokerau – we all need healthy water for healthy lives and livelihoods.</li> <li>2. Supporting tangata whenua and communities to undertake actions on the ground – NRC's focus has to be on enabling community-based action that results in long-term environmental gains and promotes sustainable livelihoods.</li> <li>3. Tangata whenua have been managing their wai and whenua, based on tikanga, kawa and mātauranga – NRC should be supporting kaitiaki and not standing in the way of rangatiratanga.</li> <li>4. We need to change how we think about and treat our wai – we must listen to our awa, repo and roto. Improving the mauri (life force) of wai is a prerequisite to sustainable livelihoods in Te Tai Tokerau. How we use our lands and forests needs to change and NRC's role is to support and enable landowners to use their lands in ways that result in improvements to freshwater first and foremost. I support giving greater respect to wai as a living entity with a right to be healthy and thrive (legal personhood).</li> <li>5. It is not sustainable to continue enabling land uses that result in declining freshwater health. Flexible and adaptable approaches are needed that support and encourage communities to work together at local levels. Setbacks and stock exclusion policies and rules should come along with NRC support to landowners to sustain alternative livelihoods from riparian margins and highly erodible land which results in environmental improvement and enhancement as quickly as possible. Incentives could be negotiated with financing institutions for loans to support fencing wider setbacks and permanent native reforestation and wetland and riparian restoration. Council should not only consider the economic costs to landowners when considering the actions proposed but also the gains and benefits from improved freshwater health to all.</li> <li>6. NRC budget allocation must consider how service delivery (such as resource consents and environmental monitoring) might be more effectively and efficiently delivered and not assume that it is the council who should be making decisions and managing freshwater. This means also committing to and following through on transferring powers and functions to māori, entering into (and implementing) relationship agreements and contracting tangata whenua direct involvement in freshwater management to name some examples.</li> <li>7. The freshwater plan change and action plan needs to focus on the freshwater needs of our children and grandchildren and not the short-term economic gain of a few. With this in mind, I would like to see climate change, Te Mana Me Te Mauri o Te Wai, empowering our local communities to improve</li> </ol>

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		<p>freshwater health and ecosystems at the top of the list for priority action. Ensuring that the health and well-being of wai are put first and foremost in all NRC's planning and decision-making on freshwater is critical to our ability to sustain livelihoods. Further work on future water demand in light of up-to-date climate science is needed, including consideration of relocation of settlements, kāinga and marae and their future water needs, as well as population growth and migration.</p> <p>8. It is important to me that spending is aligned with Climate Action and proper consideration of ways in which water wastage can be reduced, alternatives that will reduce demand for freshwater takes (e.g. desalination or cropping choices) and more equitable allocation approaches to the existing 'first come first served' approach must be explored and implemented. I support the proposed targeted water allocation policy which would set aside 20% of any allocation for particular uses such as marae, papakāinga, māori land use, and environmental enhancement. Associated funds generated by applications for other uses should be used to support community-based and hapū led freshwater improvement activities in Te Taitokerau.</p> <p>9. It is also important to me to be able to be part of wider NRC decision-making, beyond providing feedback on the draft freshwater plan change and I request that you keep me updated on what NRC is proposing in relation to freshwater, Te Tiriti, climate change and budget and LTP decisions.</p> <p>10. Mana whenua must be involved in any further development of this freshwater plan change and action plan and the Long Term Plan must include sufficient budget for input from tangata whenua from development through to implementation. The focus must be on supporting whanau, hapu and iwi action on the ground working at the community level to improve freshwater in Te Tai Tokerau.</p> <p>11. The council needs to demonstrate it is taking its Te Tiriti partnership roles and responsibilities seriously and recognise He Whakaputanga and the findings of the Waitangi Tribunal relating to freshwater.</p>
Chris Taplin	1 & 11	<p>Everyone has a role to play across all aspects of the environment. This must be understood in the clear light of day.</p> <p>The natural environment provides the back bone to life and prosperity.</p> <p>Degradation of our water and our soils will undermine our ability to trade in both world and domestic markets - simply - the money won't stack up.</p> <p>Banks won't lend against a flawed plan or model and or bad actors.</p> <p>The evidence is clear.</p> <p>Our environment must be understood and managed properly - it underpins all sectors like it or not.</p> <p>Leadership will be critical for success or failure in my opinion.</p>
Owen Taylor	2, 5 - 7	<p>I have a number of concerns with the proposed plan and the impact on Northland farming, most notably the stock exclusion from sloped land and tangata whenua consultation.</p> <p>Stock exclusion: The way this is written, it seems very impractical. Our farm has many different slope profiles, with very different risk factors. How can you create one rule for all without having to remove large areas of productive land around these areas?</p> <p>We have adopted riparian strips and sediment control measures at the bottom of the slopes.</p> <p>We are going to have a farm environment plan completed which will address the risk areas and can speak to the different risk factors. We plan on adjusting our management practises accordingly.</p> <p>Tangata Whenua consultation: Why is this being proposed? We all care for the land, and we have the right and responsibility to look after and maintain the resources under our control. I do not agree that there should be an 'us and them' approach. Surely, we can all agree on shared values. The way this has been explained to me, there is real uncertainty as to what is required, and who has control over what we can do on our farm? What if someone local decides they do not like what we are doing? Will I find myself in a legal battle?</p>
Te Arani Te Haara	1, 3, 5, 8 - 11	<p>VISION, OBJECTIVES AND OR TARGETS: Water is essential for all life on Earth, yet it is often taken for granted and not given the respect it deserves. The health of our freshwater ecosystems, including rivers, wetlands, and lakes, is crucial for the well-being of both humans and the environment.</p>

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		<p><b>SUPPORT FUNDING EFFORTS TO IMPROVE FRESH WATER QUALITY:</b> It is imperative that NRC continues to play a key role in helping landowners prioritize the health of freshwater resources on their properties. This could include providing guidance on sustainable water management practices, promoting the restoration of degraded water bodies, and incentivizing conservation efforts.</p> <p><b>MANAGING WATER ALLOCATIONS:</b> Advocating for the legal rights of water is an important step in recognizing the intrinsic value of this precious resource. Just as individuals and corporations have legal rights, water should also have rights that protect its ability to sustain life and maintain healthy ecosystems. The allocation of water rights should be done as a co governance agreement with tangata whenua.</p> <p><b>WATER TREATMENT:</b> By reconsidering the treatment of water and listening to the needs of rivers, wetlands, and lakes, we can to some degree future proof the long-term health and sustainability of our freshwater resources for future generations. NRC and other key stakeholders including Hapu have a responsibility to prioritize freshwater health and advocate for the protection of its intrinsic values.</p> <p><b>DISCHARGE TO A WATER BODY:</b> Discharge of human waste is repulsive to Tangata Whenua and harmful to the environment. Continuing this practice degrades the Mauri o te wai and leads to water pollution, harm aquatic life, and disrupt ecosystems. It is important to properly dispose of waste and prevent it from entering water bodies to protect the health of our environment and the organisms that rely on clean water for survival.</p>
Te Hiku Community Board (Sheryl Bainbridge)	1, 6, 7 & 10	<p>Te Hiku Community Board, which is mandated to act for and represent its communities supports the concerns raised in this article: <a href="https://www.farmersweekly.co.nz/politics/farmers-see-red-over-northland-livestock-exclusion-plans">https://www.farmersweekly.co.nz/politics/farmers-see-red-over-northland-livestock-exclusion-plans</a> .</p> <p>If these NRC plans go ahead the impact on our far north communities has the potential to be devastating both on an economic and social level - more farms going under, perhaps more suicides. Under the LGA 2000 the purpose of local government is to promote the social, economic, environmental and cultural well-being of communities. NRC's approach, in implementing the 2020 amendments to Te Manu o Te Wai legislation (a Labour government initiative that ACT has stated its intention to remove) supports conservation but ignores two of the four well beings that councils are required to adhere to. Who will be accountable if the council faces legal challenges?</p> <p>In disregarding both science and experience (e.g. it was not farmland but forestry land that caused widespread damage in Hawkes Bay) NRC 'thinks' we need wider setbacks and 'thinks' there is a case for excluding stock. They also seem to think that excluding stock from waterways is an effective tool for improving waterways. They obviously haven't been away from their desks long enough to see the number of swans in the Houhora harbour for example. Also the allocation of 20% of water to marae, papakainga and the Te Manu o Wai legislation is unfair on the average ratepayer.</p> <p>The statement that freshwater quality is more important than people is just ridiculous.</p> <p>Te Hiku Community Board members want to see our communities prosper, not be driven into the ground by poor legislation.</p>
Liz Temperley	6	<p>Liz is a dairy and beef farmer near Dargaville.</p> <p>Farms are surrounded by forestry and also have a long riverine border. Significant work has been undertaken over the years, through Fonterra management programmes, to fence off streams, wetlands, and vegetation areas, and at significant cost.</p> <p>Grave concerns with the draft plan change:</p> <ul style="list-style-type: none"> <li>Existing regulations have made it too expensive and difficult to farm for dairy, so switch to beef was made</li> <li>New rules around setbacks and stock exclusions would make it too difficult to farm beef</li> <li>Her farm already has vegetated riparian margins, they swim in the river, they don't think these rules are needed but it would bankrupt them</li> <li>Resource consents aren't a good tool – the costs are unnecessary and too much</li> <li>Why can't existing farm management plans be used?</li> </ul>

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		<ul style="list-style-type: none"> <li>Very emotive – this combined with Significant Natural Areas and other regulations are making it impossible to make a living as a farmer.</li> <li>Putting families and communities out of jobs, destroying NZ farming.</li> </ul>
Wendy Thomas		<p>As we have become aware of the commercial pressure on the Aupouri aquifer (our aquifer) its preservation is now very much in the hands of NRC. We are aware of many breaches of consent conditions and unlicensed bores drilled by companies willing to put them anywhere with or without consent. Our work in the environmental court has shown that NRC has not policed or attended to the monitoring of data sent as required. We need to have very strong compliance of these consents as the staging process carries on sending the water levels ever lower. There is a lack of public data available and no real time data available for public to keep an eye out.</p> <p>NRC needs to show a presence to these commercials and let them know they will not accept non-compliance. The water is necessary for ALL of us, including our soil moisture balance that supports are vegetation.</p>
Maree Thomsen	2 & 7	<p>I am writing to express my opposition to the proposed exclusion of farming activities from areas with a slope greater than 25 degrees within the Northland region. While I understand the importance of environmental conservation and sustainable land management, I believe that such a blanket exclusion would have detrimental effects on our farming community and the region as a whole.</p> <p>Firstly, the exclusion of farming from steep slopes would significantly reduce the available land for agricultural activities. In an area where farming plays a vital role in the economy and livelihoods of many residents, such a restriction could have severe economic consequences, leading to loss of income and employment opportunities for farmers and their families.</p> <p>Moreover, excluding farming from steep slopes could exacerbate issues related to land use intensification and fragmentation. Concentrating farming activities on flatter terrain may increase pressure on these areas, leading to increased soil erosion, nutrient runoff, and other environmental degradation issues in these areas. It is crucial to adopt a more balanced approach that considers both environmental conservation and the socioeconomic well-being of our communities.</p> <p>Additionally, many farmers have implemented sustainable land management practices to mitigate the environmental impacts of farming on steep slopes. These practices include terracing, contour farming, and planting of vegetation buffers, which help to reduce soil erosion and preserve water quality. Instead of excluding farming outright, the council should incentivize and support these sustainable farming practices through education, technical assistance, and financial support programs.</p> <p>Furthermore, farming on steep slopes is often a multi-generational tradition deeply rooted in the cultural heritage of our region. By excluding farming from these areas, we risk undermining the cultural identity and heritage of our communities. It is time to consider the cultural and historical values of this cohort of whenua, who may not be tangata whenua but are whenua since the Treaty of Waitangi.</p> <p>In conclusion, I urge the Northland Regional Council to reconsider the proposal to exclude farming from areas with a slope greater than 25 degrees. Instead, I recommend adopting a more nuanced approach that takes into account the socioeconomic needs and cultural values of our farming community while promoting sustainable land management practices to achieve our environmental conservation goals.</p> <p>This plan is far too radical and will eliminate farming as we know it all together.</p> <p>Thank you for considering my perspective on this important matter.</p>
John Tiatoa	1 - 12	<ol style="list-style-type: none"> <li>The vision, objectives and/or targets for our freshwater future</li> <li>Managing highly-erodible land</li> <li>Eliminating discharges to water</li> <li>Managing exotic forests</li> <li>Managing impacts on tāngata whenua values</li> <li>Stock exclusion – distance from waterways</li> <li>Stock exclusion – highly-erodible land</li> <li>Timeframes for stock exclusion rules</li> <li>Managing water allocation</li> <li>Enabling tāngata whenua to practice as kaitiaki for wai</li> </ol>

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		<p>11. Support and funding for efforts to improve freshwater</p> <p>12. Something else (please specify below) (Acknowledgement of Waipapa/Kerikeri/Wiroa/Waitangi catchments within the draft freshwater plan change and draft Freshwater action plan and inclusion of Tangata whenua into Freshwater Management Units (FMU)</p> <p>Taiamai ki te Takutai Moana (RMU) cultural interests via Waipapa/Kerikeri/Wiroa/Waitangi catchments and outer areas we make the following recommendations below:)</p> <p>Our vision, for these objectives...</p> <p>The targets, objectives within your draft freshwater plan/draft action plan. We support being apart of the Freshwater Management Units for Waipapa/Kerikeri/Waitangi catchments via Te Mana o te Wai policy and objectives as noted within NPS-FM 2024, we support the context of future management and restoration of Waipapa/Kerikeri/Wiroa/Waitangi catchments via:</p> <ol style="list-style-type: none"> <li>1. Managing highly - erodible land around Waipapa/Kerikeri/Wiroa/Waitangi catchment plans</li> <li>2. Eliminating discharges to water within Waipapa/Kerikeri/Wiroa/Waitangi catchments plans</li> <li>3. Managing exotic forests within Waipapa/Kerikeri/Wiroa/Waitangi catchment catchment plans</li> <li>4. Managing impacts on tāngata whenua values acknowledgement of Te Mana o te Wai within Waipapa/Kerikeri/Wiroa/Waitangi catchment plans</li> <li>5. Stock exclusion – distance from waterways within Waipapa/Kerikeri/Wiroa/Waitangi catchments</li> <li>6. Stock exclusion – highly-erodible land within Waipapa/Kerikeri/Wiroa/Waitangi catchment plans</li> <li>7. Timeframes for stock exclusion rules - In a timely manner</li> <li>8. Managing water allocation within Waipapa/Kerikeri/Wiroa/Waitangi catchment plans</li> <li>9. Enabling tāngata whenua to practice as kaitiaki for wai within Waipapa/Kerikeri/Wiroa/Waitangi catchments plans and have representation on the Freshwater Management Units for Waipapa/Kerikeri/Wiroa/Waitangi catchments and to oversee the catchment plans also Tāngata Whenua Water Advisory Group and Primary Sector Liaison Group.</li> <li>10. Support and funding for efforts to improve freshwater within the Lake Ompaere catchment plan</li> <li>11. Something else -</li> </ol> <p>Targeted Water allocation Policy for Waipapa/Kerikeri/Wiroa/Waitangi catchment, all waterways/ all streams/all rivers are connected to high lands around Waipapa/Kerikeri/Wiroa and Ohaeawai/Taiamai/Waimate areas. Also noting the Waimate/Taiamai/Ohaeawai aquifer, Waipapa/Pungare/Kapiro aquifer and Wiroa/Kerikeri/Okaihau aquifer are areas of interests for our Hapu collective of our Resource Management Unit</p> <p>Waipapa/Kerikeri/Wiroa/Waitangi catchments we are wanting to improve freshwater health when we support Freshwater Plan/Action plan and Freshwater management units via:</p> <ol style="list-style-type: none"> <li>1. Freshwater plan change (rules) to support restoration for Waipapa/Kerikeri/Wiroa/Waitangi catchment plans via (FMU)</li> <li>2. Government funded projects within Waipapa/Kerikeri/Wiroa/Waitangi catchment plans via (FMU)</li> <li>3. Landowner voluntary actions: Landowners within Waipapa/Kerikeri/Wiroa/Waitangi catchment plans via (FMU)</li> <li>4. Primary sector organisation: partnerships with Waipapa/Kerikeri/Wiroa/Waitangi catchment plans via (FMU)</li> <li>5. Freshwater Farm plans: within Waipapa/Kerikeri/Wiroa/Waitangi catchment plans via (FMU)</li> <li>6. Landcare groups within Waipapa/Kerikeri/Wiroa/Waitangi catchment plans</li> <li>7. Kaitiaki of Waipapa/Kerikeri/Wiroa/Waitangi catchment plans</li> <li>8. Northland Regional Council actions for Waipapa/Kerikeri/Wiroa/Waitangi catchment plans</li> <li>9. NPS-FM set for bottom lines for health waterways within Waipapa/Kerikeri/Wiroa/Waitangi catchment plans</li> <li>10. Policy and Objectives of NPS-FM 2024 and for the inclusion of Tangata whenua within Freshwater Management Unit within Waipapa/Kerikeri/Wiroa/Waitangi catchment plans</li> </ol> <p>We need to discuss Targeted Water allocation Policy within Waipapa/Kerikeri/Wiroa/Waitangi catchments</p> <p><i>(Attachment: National Policy Statement for Freshwater Management 2020 – January 2024 – if required)</i></p>

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Liz & Lloyd Timperley	1 – 4, 6 & 7	<p>Firstly I'd like to say that us as farmers who have lived all our lives in Northland don't appreciate the fact that we are being now treated as the enemy as if we have not looked after our waterways or our land. We own the land, we have been on the same farm for 30 years, we have an attachment to the land, we understand how climate changes, how floods and rain affect our farm, we deal with it on a day to day, year by year basis, we know our own farms better than anyone and mitigate any bad events as much as possible. The health and well being of our animals and our land/rivers are very important to us. Our children have grown up here, we kayak in our rivers and swim in the dams and the rivers, we fish for eels and there is much bird life along them. We have a 9km river boundary which floods regularly and are now surrounded by pine forestry which is greatly affecting us. Work with us, not against us, don't work on a one size fits all approach, we have environmental plans already, this is so much doubling up, extra work, cost and stress for all!</p> <p>Managing highly erodible land - This would become a patchwork farm/very costly to fence and impractical to say the least, we would lose a large portion of our productive farmland. Let us plant trees in the right places at our discretion to protect these vulnerable areas. We have many natives already on our land that could have been removed but we chose to keep.</p> <p>way too costly to fence and too difficult to manage.</p> <p>Eliminating discharges to water - We are in the process of setting up an effluent system to discharge to land, to then have to get resource consents to do this is another cost, a yearly evaluation like we had of our effluent systems in the past is all that is needed.</p> <p>our effluent has been tested by councils for 30 years and been compliant, we have frogs in our last pond, our rivers are clean enough for us to swim in, we do not farm intensively nor have a high nitrogen use.</p> <p>managing exotic forests - Our neighbours have now sold to forestry, pine plantations which now create weed issues from ragwort/blackberry and gorse, our waterways carry the ragwort from the forestry to other farms creating issues, wild pigs are now coming out from this land that have never been a problem before, now destroying productive crops and damaging farm land. Pine trees have been planted along our waterways, too close to be legal, many have fallen down into our river in the last storm blocking it up in many places, that is not from farming!</p> <p>stock exclusion - highly erodible land - There is no mention as to whether stock exclusion with the new rules would include sheep or goats? your costings on highly erodible land DO NOT include production from dairy cattle! To exclude stock from these areas would make our farm unmanageable, it would be better for us to plant more trees in areas that we know are highly erodible to stabilise the land or keep the stocking rate lower on those areas, but leave it to the farmers that know their own farms! Then if you add in SNA's where will our animals go??? lead ins won't change the ongoing cost of the loss of productive land.</p> <p>The vision, objectives and/or targets for our freshwater future - waterway buffers. Keep to the 3m - 5m buffers with flexibility, the 10 m buffers are unnecessary and unworkable with us losing too much of our productive farmland, you say yourselves the 3-5 m buffers provide effective filtering. climate change in your chart is worked out from what exactly? Trust the farmers, it is OUR land!</p> <p>Pigs are not excluded at present, they come in from forestry land onto our land through our fences, it is not possible to fence them out! They are destroying our crops and farmland.</p> <p>Our farm floods regularly, in the last flood sediment came up out of the river onto our pasture, not the other way round, forestry is planted too close to the rivers and rubbish from them and fallen trees are now blocking up our river causing more flooding and erosion. They have not followed the rules on planting.</p> <p>We have a muddy river, it has always been that way, nothing to do with our stock.</p> <p>Riparian planting won't happen, we do not have the time or money to do this, if we go to beef we will have even less! weeds will grow in these areas instead, especially blackberry and ragwort. In flooding times most of this riparian planting would be washed away. where is the evidence that set backs of 10m will mitigate climate change? We have a lot of shade and tree cover on our farm already. The trees help stabilise the banks. why would we want to spend any money on riparian planting when there is no certainty that we can keep farming profitably due to these unworkable rules?</p>

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		<p>there is no recognition for the fact that if we have protected the trees and vegetation we have on our farms, without us they would not exist!</p> <p>we will continue to:</p> <p>protect the trees and vegetation we have on our land</p> <p>put water troughs in for access to water instead of the rivers/streams but need access to dams for when there are droughts and ongoing water issues</p> <p>plant trees in the right places to prevent erosion</p> <p>keep our stocking rates as they are which is already very low</p> <p>keep our nitrogen level low like it already is</p> <p>look after our animals and our river</p> <p>farm for the future and for our kids futures.</p>
Puti Tipene		<p>As a member of the public and a Te Tai Tokerau resident, I am greatly concerned about the poor health of freshwater and the urgent need for us all to treat wai with more respect. I am seeking your support and action to ensure that the proposed freshwater plan change and action plan, and the Long Term Plan, uphold Te Mana Me Te Mauri o Te Wai, as a matter of urgency and priority.</p> <p>It would also be good to see Northland Regional Council consider what it has proposed in the draft plan change and action plan along with other ways that things can get done because, delivery by NRC is not the only way, nor the most effective and efficient. The things that are important to me are listed below.</p> <ol style="list-style-type: none"> <li>1. Te Mana Me Te Mauri o Te Wai is fundamental and central to improving water quality in Te Tai Tokerau – we all need healthy water for healthy lives and livelihoods.</li> <li>2. Supporting tangata whenua and communities to undertake actions on the ground – NRC's focus has to be on enabling community-based action that results in long-term environmental gains and promotes sustainable livelihoods.</li> <li>3. Tangata whenua have been managing their wai and whenua, based on tikanga, kawa and mātauranga – NRC should be supporting kaitiaki and not standing in the way of rangatiratanga.</li> <li>4. We need to change how we think about and treat our wai – we must listen to our awa, repo and roto. Improving the mauri (life force) of wai is a prerequisite to sustainable livelihoods in Te Tai Tokerau. How we use our lands and forests needs to change and NRC's role is to support and enable landowners to use their lands in ways that result in improvements to freshwater first and foremost. I support giving greater respect to wai as a living entity with a right to be healthy and thrive (legal personhood).</li> <li>5. It is not sustainable to continue enabling land uses that result in declining freshwater health. Flexible and adaptable approaches are needed that support and encourage communities to work together at local levels. Setbacks and stock exclusion policies and rules should come along with NRC support to landowners to sustain alternative livelihoods from riparian margins and highly erodible land which results in environmental improvement and enhancement as quickly as possible. Incentives could be negotiated with financing institutions for loans to support fencing wider setbacks and permanent native reforestation and wetland and riparian restoration. Council should not only consider the economic costs to landowners when considering the actions proposed but also the gains and benefits from improved freshwater health to all.</li> <li>6. NRC budget allocation must consider how service delivery (such as resource consents and environmental monitoring) might be more effectively and efficiently delivered and not assume that it is the council who should be making decisions and managing freshwater. This means also committing to and following through on transferring powers and functions to māori, entering into (and implementing) relationship agreements and contracting tangata whenua direct involvement in freshwater management to name some examples.</li> <li>7. The freshwater plan change and action plan needs to focus on the freshwater needs of our children and grandchildren and not the short-term economic gain of a few. With this in mind, I would like to see climate change, Te Mana Me Te Mauri o Te Wai, empowering our local communities to improve freshwater health and ecosystems at the top of the list for priority action. Ensuring that the health and well-being of wai are put first and foremost in all NRC's planning and decision-making on freshwater is critical to our ability to sustain livelihoods. Further work on future water demand in</li> </ol>

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		<p>light of up-to-date climate science is needed, including consideration of relocation of settlements, kāinga and marae and their future water needs, as well as population growth and migration.</p> <p>8. It is important to me that spending is aligned with Climate Action and proper consideration of ways in which water wastage can be reduced, alternatives that will reduce demand for freshwater takes (e.g. desalination or cropping choices) and more equitable allocation approaches to the existing 'first come first served' approach must be explored and implemented. I support the proposed targeted water allocation policy which would set aside 20% of any allocation for particular uses such as marae, papakāinga, māori land use, and environmental enhancement. Associated funds generated by applications for other uses should be used to support community-based and hapū led freshwater improvement activities in Te Taitokerau.</p> <p>9. It is also important to me to be able to be part of wider NRC decision-making, beyond providing feedback on the draft freshwater plan change and I request that you keep me updated on what NRC is proposing in relation to freshwater, Te Tiriti, climate change and budget and LTP decisions.</p> <p>10. Mana whenua must be involved in any further development of this freshwater plan change and action plan and the Long Term Plan must include sufficient budget for input from tangata whenua from development through to implementation. The focus must be on supporting whanau, hapu and iwi action on the ground working at the community level to improve freshwater in Te Tai Tokerau.</p> <p>11. The council needs to demonstrate it is taking its Te Tiriti partnership roles and responsibilities seriously and recognise He Whakaputanga and the findings of the Waitangi Tribunal relating to freshwater.</p>
Francis Tothill		<p>Hi would like to make some suggestions to save our water ways. Some points.</p> <p>1 all run off should filtered</p> <p>2 developer and land owners should pay for this and monitor it</p> <p>3. All road run off should filtered before it reaches a water way</p> <p>4No sewage overflows into any waterways or commercial runoff including any properties</p> <p>5all road and street water hold Petrol heavy metals rubber etc</p> <p>Fines off substantially large amount put in place and enforced</p> <p>Some suggestions</p> <p>Everything that is not toxic should be treated through a wetland and salt water marshes 🌀</p> <p>Every bit run of</p> <p>Anything that can't, should be pumped into holding ponds</p> <p>Boat hulls etc must be checked for any form of contamination and not allowed 🚫 to pollute the waters in any way that includes commercial fishing vessels and other marine vessels</p> <p>The only thing that we haven't completely destroyed is our waterways and oceans 🌀🌀 if we keep on the track that we are on it will be all over I'm picking within a few years</p> <p>Make the waterways drinkable 🍷🍷🍷</p>
Mel Turner	2, 4, 6, 7 & 9	<p>This plan is nothing but a new way of land grabbing! Excluding stock from hills on our small farms is going to kill farming, our upbringing, our kids future on the land, our income, the country's independence on supplying meat etc.</p> <p>This is going way too far! I can agree some more waterways could be fenced, not 10m away! More need to be done with slash and slips around forestry and council reading projects and council dumpsites when roading or roading slips occur. Maybe some education for fertilizing would help.</p> <p>In short, I say NO to the council's new dumb idea of telling us how to use or stock our land. Red tape is killing NZ.</p> <p>Maybe just turn back time to where land wasn't over stocked! Drop the price of rates so we can afford to farm. Stop penalizing us.</p>

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		Thanks for your time and consideration. I have much more to say but will have to get back to work. Cheers
Will Tye	6	<p>The fencing setbacks are not practical as they are written in the plan. You can not have a blanket rule for every farm and every river. We have a dead flat farm, and have fenced off all of our waterways, but to 3 meters. This is sufficient and has been highlighted as such in our farm environment plan.</p> <p>If we had to increase this to 10 meters, it would create real issues. In this fenced off area, there would be a build-up of grass and dead matter, causing flooding across our paddocks, resulting in soil damage and sediment loss.</p> <p>Our farm environment plan has addressed the issues highlighted by NRC and are tailored to our farm. Keeping the 10m zone weed free will also be a major concern. I am not prepared to control such weeds with a spray that doesn't kill grass or native species. NRC currently is failing to keep the stopbank weeds such as Pampas and gorse down.</p> <p>Flooding is already a real concern for the Kaitia area with significant dollars going into improving the effectiveness of the river systems. Anything that slows the rivers water movement or chokes up waterways (fallen trees) will only make this worse.</p>
David Van Bysterveldt	5, 10 & 12	<p>I have grave concerns about the Iwi consult component of this plan. What are you asking of us as land owners when consulting Iwi. It will open us up to potentially being held ransom. It could put the power into the non-land owners hands to have unreasonable conditions put on land owners.</p> <p>I would like to see the council managing any cultural significance and applying the rules fairly and appropriately.</p>
Reuben Vincent	6 - 8	<p>The stock exclusion and planting plans will create a vermin and weed habitat that will be an issue. The highly erodible land is subjective. Some soils will be better able to handle stock than others. The cost to some farmers will be prohibitive and will take a lot of land out of production and could see a lot of land go into pines a a huge cost to our small towns with job losses and sales of land to overseas investors for carbon credits. This is not good for our community's or New Zealand as a whole.</p> <p>If you do exclude stock from some areas it should only be for the wettest part of winter and not for the summer</p>
Vision Kerikeri (Rolf Mueller-Glodde)	1 - 12	<p>(Enforcement)</p> <p>Vision Kerikeri fully support the "draft Freshwater Plan Change".</p> <p>New Zealand's and Northland's wellbeing of people and economy depend on clean water. The present situation of unclean rivers and lakes is not sustainable and requires urgent action. This might require rules and restrictions limiting immediate economic outcomes of individual operations, but they are necessary to ensure their long-term success. Dirty rivers lead to dirty coasts with impact on recreation and fisheries.</p> <p>The described Tāngata whenua perspectives on water are appropriate.</p> <p>NRC must impose required rules and restrictions to safeguard the waterways and lakes as well as to ENFORCE them in conjunction with District Councils.</p> <p>Sedimentation and E.coli (irrespective of human from faulty/overflowing septic tanks or animals) in rivers and lakes must be stopped. Wherever they are noticed, the source of pollution must be investigated and stopped. The present finger pointing from one to the other Council must stop.</p> <p>Water testing and the website <a href="https://safeswim.org.nz/">https://safeswim.org.nz/</a> is good to have for the time being, but action is required to improve the situation vigorously.</p> <p>The lack of riparian planting and fencing must be rectified with regulation, advice and financial support, however with little delay: farmers have had ample of time to be prepare for this obvious requirement. Financial support should be limited to low income farmers.</p> <p>We especially support</p> <ul style="list-style-type: none"> <li>- protection of highly erodible land</li> <li>- 10 meter setback for cattle, although more might be appropriate/necessary in certain areas like steep land to avoid erosion and pollution</li> </ul>

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		<ul style="list-style-type: none"> <li>- stock exclusion rules to our most highly erodible land and encouraging stabilisation of these areas with trees. It would be effective at reducing sediment runoff and make slips less likely and less severe. Furthermore, some of the costs of excluding stock from this land can be recouped by planting in carbon forestry or permanent forests that are selectively logged.</li> <li>- add non-dairy stock to be excluded from hill country wetlands</li> <li>- stock exclusion should be extended to apply to all farmed animals</li> <li>- phasing in new stock exclusion requirements over the next 10 years or so, if not possible earlier (maybe with incentives)</li> </ul> <p>&gt;&gt;&gt; surely the estimated short term cost will lower than the long term effects of erosion and pollution</p> <p>Example:</p> <p>We particularly support keeping stock out of waterways with rules for streams in steeper areas. Vision Kerikeri administers a volunteer group restoring Wairoa Stream Kerikeri as a public walkway and wildlife corridor. Four km including part of two tributary stream banks have been planted between 2017 and 2023 with about 23000 native plants. These plantings are generally 10M in width, which is wide enough to eliminate the edge effect of sun and wind. The goal is to restore the stream as far as the source about 6 km further upstream. However further upstream Wairoa Stream is unfenced and cattle have access to the waterway.</p> <p>From the standpoint of human health, water quality and aquatic ecosystems, it is unacceptable to continue to allow livestock to contaminate waterways with pollutants, such as faecal pathogens, nitrates, and sediment. It makes poor sense to exclude animals downstream if in hill country areas streams do not require exclusion from contaminants.</p> <p>Ideally a setback should be 10M. It is feasible to exclude stock – and many landowners have already done so. Dairy NZ reported in 2014 that approximately 94% of the water bodies covered by the dairy water accord had stock exclusion in place (cited in NRC Section 32 report, section 4.9.3). Fonterra's accord with its farmers, which has been largely successful, has been well signalled, and dairy farmers have had considerable prior notice.</p> <p>It is recognised that there is a cost to fence and plant stream edges and we would support subsidies or grants to farmers and that it will need advice and support and will take time.</p> <p>We also support the draft Water Allocation Policy.</p> <ul style="list-style-type: none"> <li>- Water is a limited resource which needs to be treated, managed and allocated responsibly to avoid problems in the future.</li> <li>- The current 'first in first served' system is unsustainable and unfair.</li> </ul> <p>We support the 20% water allocation policy to improve cultural, social, economic and environmental outcomes for wai</p> <p>We support the existing "Actions", but</p> <ul style="list-style-type: none"> <li>- while monitoring and research is essential, they need to lead to more action.</li> <li>- we consider Action 7: Compliance and Enforcement of existing rules as insufficient.</li> </ul> <p>e.g. when E.coli is found in the Kerikeri River, the source has to be searched and eliminated rather than just noted. Vision Kerikeri was informed by the previous CEO that the E.coli was caused by "avian" in the Kerikeri Basin (ducks, geese, doves, gulls) which VKK's water testing at testing stations further upstream proved wrong (also polluted); also repeatedly the testing showed much higher E.coli levels after heavy rain; thus it needs to be researched whether the source is human (ill-functioning septic tanks) or bovine (stock in or near the river); in case of septic tanks, immediate cooperation with FNDC is required; 176 abatement notices and 101 infringement notices within one year seem to be very low</p> <p>We support Potential Action 8: Funding to support stock exclusion, riparian planting and restoring wetlands</p> <p>We support Potential Action 9: Increased compliance</p> <ul style="list-style-type: none"> <li>- We understand that it is costly, but with stricter enforcement, penalties for non-compliance can cover at least part of the cost. The effect might be more volunteer compliance to avoid penalties.</li> <li>- It is obvious that Action 1: Freshwater state of the environment monitoring programme with about 20</li> </ul>

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		<p>staff is expensive, but possibly ineffective without researching causes with a lead to compliance - so cost might be shared for the two Actions.</p> <p>We support Potential Action 10: Supporting tāngata whenua involvement in freshwater management and decision-making</p> <p>In regard to New potential actions over and above existing NRC commitments it's difficult to judge whether numerous points cannot be covered by existing staff and what the impact on rates would be. While we would consider more rates for more positive impact on the environment and climate positively, it might be tough for the majority of ratepayers?</p> <p>We request Waste Water Effluent for ecological and cultural reasons to stop being discharged into waterways and lakes. All existing WWTPs need to be changed asap. Appropriately cleaned waste water (e.g. with low cost Electro Coagulation) can provide valuable food safe irrigation water and fertiliser.</p> <p>We also request controlling of exotic forestry:</p> <ul style="list-style-type: none"> <li>- Larger setbacks for exotic plantation forestry from waterways are required</li> <li>- Prohibit clear-felling of forestry in high risk and steep areas: slash has been problematic in recent storm events</li> <li>- requiring consents for plantation forestry in dune lake catchments</li> <li>- livestock owners who have not yet excluded stock from waterways must not be allowed to impact New Zealand's major assets adversely.</li> </ul>
Robert Wagener	7	<p>We are opposed to the proposal.</p> <p>We enjoy a good working relationship with NRC, part of which involves the fencing of riparian waterways. NRC have provided funding for some of this fencing while we have forged ahead in other areas of our own accord. We are aware of our environmental responsibility to the surrounding waterways, and we do not require heavy handed stock exclusion rules. We can manage the risks appropriately and are willing to work with NRC in the future to achieve this but not through a blanket stock-exclusion policy.</p> <p>We are a third-generation family farm that is navigating our way through the succession process. Part of this process has been in the outlay of capital to increase accommodation, which is a long-term financial commitment from us. Going into this process we knew our financial capabilities based on a certain number of cows and a certain productivity per cow. The proposed changes to the plan would mean a drastic reduction in our herd and it feels like the rug is being pulled out from under us. Our business now supports two young families, the financial implications for the farm will have a negative impact on these young families. Our farm has been in the family since the 1950s. It is not intensively grazed. It is a coastal property, as is much of Northland, and as such it has borne the brunt of many weather events during the last seventy years. The historical storms and cyclones have had negligible effect on the hill country.</p>
Waikopani Holdings Ltd (Sean Alexander)	2, 7	<p>I am writing to you concerning the Draft Freshwater Plan change. My primary concern originates from Patai 2 involving stock exclusion rules on highly erodible land. Throughout my time as a rural professional, I have conducted extensive research into trends in freshwater quality in the Kaipara Moana Catchment and how this can be improved by policy implementation. Through review of the draft freshwater plan change, I have some key concerns regarding the generation and implementation of the draft specific to an interested party. Waikopani Holdings Ltd is an agricultural property located in the Mangakahia Valley. At a high level the farm is running approximately 365 dairy cows, along with over 500 trading cattle. At a comparatively low stocking rate.</p> <p>A large proportion of the property already has stock exclusion in place as marginal land has proven to be unproductive over time and is better to be retired into native bush or utilised as production forestry.</p> <p>The Database developed by Duncan Kervell using LiDAR to a one-meter scale is a valuable tool that is able to identify areas that are likely to be of high risk of erosion. However, utilising this tool to implement a blanket policy across the region will never be as effective as a site-specific approach that allows for a wide range of mitigation implementation options as well as expanding on existing mitigation practises that correspond to the locations own unique characteristics and erosion risks.</p> <p>To highlight the point that utilising a site-specific approach through farm management plans, Waikopani Holdings has well established wetlands, swamps, and a pond system on the property. These</p>

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		<p>all are excluded from stock and serve a valuable purpose for the property. They provide habitat for birdlife, and other species, as well as filter out sediment through vegetation, filtration and sediment trapping. This is done through reduced flow allowing suspended sediments to settle out and accumulate within the wetland. These wetlands and lakes on the property prevent sediment from reaching the ocean. This is an identified mitigation factor that benefits the environmental sustainability of the property without sacrificing economic viability. Under a farm management plan approach to sediment erosion reduction these factors could be identified, whilst under blanket policy implementation these factors of great importance to the property as an individual are neglected. This is not just the case for Waikopani Holdings as many other properties have mitigation methods implemented.</p> <p>The majority of areas identified as HEL2 are already excluded from stock grazing. However, the few areas of HEL that are still in pastoral land use flow through a wetland, these wetlands naturally trap sediment and prevent suspended sediment from entering the waterways and consequently the ocean.</p> <p>The resulting outcome of stock exclusion from highly erodible land would be both moderate and tightly controlled resource consents over portions of the property but have a larger and more significant impact on other farms in the area. These resource consents would be in place without consideration of the already established mitigation approaches. This would result in significant economic losses.</p> <p>The only cost mitigation strategy provided by the Northland regional council is "by planting the land in permanent forest and claiming the carbon credits", This would see almost all agricultural production activities on the property stop and would be the case for a large amount of properties affected under the proposed policy.</p> <p>It is certain that implementing this policy will have a severely negative affect on the profitability, mental wellbeing, and quality of life of farmers that are affected and greatly reduce the longevity of farming in Northland. Implementing sediment management plans across all land uses where HEL land is identified would ensure farmers, growers and commercial forests all contribute to mitigating the sediment loss from their property. This would see a large influx of waterway plantings, wetlands, and more ecologically beneficial mitigation methods.</p> <p>I would also like to extend my gratitude towards everyone involved for considering this submission when reviewing the Draft Freshwater Plan Change. If you require any clarification or further communication, feel free to get in touch with me with the provided details.</p>
Jorja & Clive Walden	1 – 3, 5 – 9 & 11	<p>We are writing this regarding the draft freshwater plan. We have been farming here in Oruaiti (Mangonui) since 2005 and when we arrived the river was not fenced off. This was a source of water for the stock, but we wanted to protect the river margins and stock banks so we fenced in sensible places (the highest point) mostly at the top of banks.</p> <p>In most places there is sediment that has been deposited from flood waters overflowing into the paddocks. In most places this high point slopes back into the paddock, and depending on how or where you describe the edge of the river bank being - this could be 10m or more away from where the river flows.</p> <p>We put our fences in the places where they would be out of reach from most of the flooding levels. It would be ridiculous and impractical to move the fences 10 meters further into the paddock from this high point.</p> <p>We have approximately 7 kms of river boundary on the Oruaiti River.</p> <p><b>We were supreme winners of the Northland farm environment awards in 2012.</b> Part of the reason we won this award was because we had forethought and cared for the environment. We didn't fence our rivers off to win an award - we did it to protect the waterways.</p> <p>We regularly swim and fish and catch whitebait in our river - we see it as an important part of our environment that needs to be protected.</p> <p>Not only have we fenced the river off but we have also fenced off and reinstated large grassy swamp areas - taking large areas of land out of our production. We saw this as a vital way to protect the river by capturing sediment and runoff before it reaches the river and ocean. We did not do this in 2006 to tick some boxes - we did this to look after the land and the water.</p>

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		<p>As far as the effluent consent goes we agree that this is important, we are spending 1 million dollars on a new enviro shelter to capture rainfall on our feed and standoff pad - to stop this going into our effluent treatment system.</p> <p>We consider human faeces much more toxic than chewed up grass and are disgusted when we hear about towns and cities with human waste treatment facilities being discharged into waterways.</p> <p>It should be the same rule for everyone.</p> <p>Basically when we started farming we did not realise that we would need consent to farm it! What's next - applying for a consent to mow the lawn?</p> <p>Does the Northland Regional Council understand the benefits of farming to our economy?</p>
Gareth Walters	2, 7 - 9	<p>The degree of slope deemed erodible is simply ridiculous. Our farm is stocked accordingly as to cause minimal damage to pasture and soil structure. We are very mindful of the environment and will continue to do so for generations to come. Removing areas that are affected will have a serious impact on Northlands economy. Please re think this plan.</p> <p>Also the water in NZ belongs to everyone. No race should have any more rights or authority to it than anyone else. We are all Kiwis together.</p> <p>Thanks</p>
John Ward		<p>In response to your request for feedback on freshwater WAI it matters residents of Whareora Road adjacent to the Mangakino Stream (aka Hatea River) wish to make the following submissions.</p> <p>The Mangakino Stream along Whareora Road is beyond its ability to carry the flood waters being imposed on it without severely damaging houses, roads and water supply infrastructure.</p> <p>Since 1975 the stream has flooded houses in mid 1990s, 28-29 Jan 2011, 18 March 2012, 17 July 2020, 11 Nov 2022 and cyclone Gabriel 2023. The rise and fall of the river is quicker each time, the height of the flooding is increasing and it is happening at an increasing frequency.</p> <p>This is now recognised by the insurance companies who will no longer cover some of the effected houses for flood insurance. This severely effects those residents with increasing costs of repairs, the value of the houses and ability to sell. In addition the residents suffer from stress whenever there is heavy rain forecast.</p> <p>While climate change may explain some, the major cause of the increase is because of the development of farm land in the catchment area into housing with faster run off of stormwater from roofs and sealed areas into the Mangakino Stream which is beyond its capacity at such times.</p> <p>No further development should occur in the catchment of the Mangakino Stream until this issue is addressed. This could be by deepening the river channel, clearing obstructions or holding storm water in the area it falls and a controlled release or a combination of these and other remedies.</p> <p>The Mangakino Stream is a storm water asset that is being used beyond its capacity. Every new house built and impermeable surface (roads, footpaths etc) in the catchment area increases the water flowing through homes in Whareora Road during storm events.</p> <p>These Whareora Road houses never used to flood and were permitted to be located there with the Whangarei District Council's and the NRC's predecessors' knowledge. The resident's lives are now being put at risk by these rapid water level rises during floods and their mental health damaged. Water has been up to the light bulbs in one house. By their nature people will take risks to secure their pets and possessions.</p> <p>The NRC has the power to solve this issue which has been caused by poor planning, lack of hazard controls, over development and under investment in matching the river capacity with the increased water flows. We seek your urgent attention to this very distressing issue.</p> <p>NRC to consider this submission to also cover the state of flood preparedness generally as well as water quality and to prepare a flood amelioration plan for Whareora Road.</p> <p>Roland Chiu, Rita Chiu, Pei-Yu Chiu, John Ward, Mike Procter, Renee Procter, Michael Sullivan, Caroline Sullivan, Murray Coop, Leah Coop, Rama Taylor, Steve Taylor, Chris Jenkins</p>

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Michael Ward	1, 6 & 7	<p>Moturoa Island is a privately owned island situated in the Bay of Islands, Northland. New Zealand and Northland have been established and brought up as a farming community and we believe we have an existing use right to farm our land as we deem appropriate</p> <p>Geographically Moturoa can be described as low to rolling country. The island has been farmed by the current owners with sheep only for over 50 years and has high standards of animal husbandry and environmental protection. It is a gazetted wildlife refuge. It has 3 small natural freshwater streams all of which are currently self-managed by fencing to exclude stock from the immediate area.</p> <p>The proposed new plan identifies Moturoa as a red zone area thus I believe requiring a resource consent to continue the farming operation. Needing the Resource Consent not only raises the issue of considerable additional cost but also the possibility that such consent may not be granted meaning no farming may be permitted in the future.</p> <p>The farm is our only source of income and such an outcome would be financially disastrous to the Company.</p> <p>I note the current proposal does not include sheep as an excluded stock category and we are opposed to that definition being widened to do so which it is indicated may happen in later discussions.</p> <p>In summary:</p> <p>1 Moturoa is generally opposed to the plan change proposal due to the disastrous economic effect it will have on current farming practices in the wider region; and</p> <p>2 Is specifically opposed to any future widening of the definition of stock to include sheep as a qualifying category.</p> <p>Please ensure Moturoa is kept in the loop of any further discussion We would wish to be physically heard on any hearing matters.</p>
Tom Warren	5 & 10	<p>I do not see why we have to have extra additional governance in the form of Tangata Whenua to practice Kaitiaki for Wai, and or implication of values.</p> <p>There is already governance in the oversight of law, best practice and procedures, and all this will be doing is adding additional cost and bureaucracy to the oversight of all New Zealanders water, be it for the Northland region in this instance. How much additional money will this cost per annum?</p> <p>If Tangata Whenua is already part of the employed staff then I do not have a problem, but if it is additional to those staff members, then I do.</p>
Fiona Watt	1, 5, 6 & 10	<p>What I think is that you are creating scenarios that will make farming inoperable and unviable for a lot of farmers. They have already spent many dollars fencing off waterways now you want them to pull the fences out to make their buffer zones wider. You're nuts. And then add more vegetation. Who's going to pay for it? You are not expecting rate and tax payers to foot the changes are you?</p> <p>As for Māori/iwi consultation, forget it. The biggest gangs in NZ, apart from the police and the government, would have to be iwi. Continually holding out their hands for money and rights, like they should have any more than the rest of us. I object to Māori having special rights and expectations regarding the water in our land New Zealand. What makes you think Māori will look after the water, they don't look after their own people. The ones in our town are up to their necks in poverty. I was born here, I am tangata whenua, but I don't expect special privileges, that will always lead to conflict.</p> <p>Since I'm filling this out on my phone I can't see all the aspects to comment on without closing my feedback. It seems to me the government is creating an agenda to push people off the land, with more rules and regulations when none are necessary, appeasing one group of people, to the detriment of the whole country. Where do you think food comes from. If you were really concerned about our fresh water you'd be looking at how govt funded pine trees are sucking up all the ground water, and how the constant chem trailing is affecting/acidifying our water, how towns across NZ can't afford to replace their old water pipes, the old asbestos lines ones are still in use because councils can't afford to replace them. What there should be, is a water tank on every property. And councils and government should NEVER hold permission to come onto the properties to treat the water with fluoride and other toxic chemicals.</p>

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Will Watts	6 & 7	<p>I run a mixed beef and forestry farm in the far north.</p> <p>I am broadly supportive of the plans, although realise some farmers will be devastated as the changes for them will be massive, which should be taken into consideration.</p> <p>Specifically I have two concerns about the plans as currently drafted (if i read them right).</p> <p>There should be provision to move stock over fords as an exception for those people who have waterways which would make it difficult or impossible (if they are organically certified) to move them on the roads. The exclusion could be a limited number of times per annum (2-4) and only if the animals are supervised at all times.</p> <p>There are some very small red pixels in the middle of paddocks which it would be really very difficult to identify and exclude, ignoring the extremely prohibitive cost. There should be a minimum area of red on the map/ha to trigger the exclusion protocols to avoid 1 square metre blocks having their own fencing requirements.</p> <p>Thanks for your time,</p>
Daryl Way	1, 2, 6 – 9 & 11	<p>I agree with the statement that “big changes are needed” to improve the health of Northlands waterways.</p> <p>With silt deposition in some coastal waters occurring at 30 times the rate pre colonisation , very few of our streams meeting healthy water standards, nitrate levels in water from aquifers rising and lakes eutrophying it is obvious that the controls on those activities which impact water on water quality are not adequate .</p> <p>High rates of erosion on highly erodible land results in poor water quality downstream and in coastal waters. Failure to control this erosion because of the costs to landowners simply transfers the costs to those downstream and results in the unsustainable loss of the topsoils which are the key resource for land users.</p> <p>Dry stock farmers may need some assistance to fence vulnerable areas however they have known since Fonterra required its suppliers to fence off waterways that “the writing was on the wall” for them to follow suit. If you kick the can down the road long enough you end up stubbing your toe. The “ Economic Evaluation of Stock Water Reticulation on Hill Country”( Journeaux &amp; van Reenen) report for Ministry of Primary Industries and Beef+Lamb indicated there was a significant return to be had from stock water reticulation systems on hill country in both monetary terms and farmer wellbeing. These improved returns would cancel out the fencing costs for hill country farmers in the long term.</p> <p>Considering the long lead in time for farmers to face up to the need for riparian fencing calls for extended deadlines can only be seen as a “hope the problem will go away” which is not a sound business practice.</p> <p>Poor returns for farm produce has resulted in farming becoming a life style choice for many farmers rather than an sound economic venture but farmers lifestyles should not impact negatively on others lifestyles or business activities or prevent the development of alternative economic ventures which may have greater monetary and environmental benefits .</p>
Simon Webb	1, 2, 7 & 11	<p>The aspirations in the draft Freshwater Plan Change are good and necessary. However, farmer's livelihoods are on the line and there will be hard pushback on many of the draft proposals. Opportunity cost and asset cost will be prohibitive for some landowners without intervention (especially on marginal land which is likely to be the most financially vulnerable, but also the most encumbered by excessive sediment runoff).</p> <p>Trees are a significant part of the solution - both for erosion mitigation and for diversifying income for landowners. Farm forestry has the potential to reduce erosion and offset costs and loss of income from the retirement of pasture. However, information on the best use of trees in farming systems is ad hoc and doesn't have deep farming industry penetration.</p> <p>NRC should put resource into, and oversee, a collaborative consolidation of all farm forestry experience into one easily accessible knowledge hub (with appropriate consideration given to Registered Forestry Advisor regulations). This should include a farm scale modelling tool to indicate potential</p>

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		<p>environmental gains and a range of potential incomes through ETS and/or sale of logs - again, with appropriate provisos and limitations given.</p> <p>It has long been recognised that a mosaic of optimised land uses within the farm is the ideal. The farmer should be able to receive answers to these questions:</p> <ol style="list-style-type: none"> <li>1) What are the best uses of land on my farm?</li> <li>2) What is the cost/benefit analysis to me (including environmental cost/benefit)?</li> <li>3) If I can't afford to implement this land use change, what assistance is available?</li> </ol> <p>Proposal:</p> <p>That NRC invests resource into a 'Trees on Farms' package for Northland landowners that is active rather than static i.e. it should include an adaptive and constantly updated knowledge hub, a modelling tool and an assistance component. The ability to give real world examples would be invaluable to boost landowner confidence and shift current practices.</p> <p>If we're going to lump this Freshwater Plan Change on farmers, we have an obligation to help them as much as we can, or 'whole farm' forest conversions will become the norm at the expense of our rural communities.</p>
Helen Wech	1, 2, 6, 7 & 10	<p>We totally agree with the objectives to improve the water quality in Northland. This has to be done in a manner that is economically sustainable for the region. Seeing the right trees in the right place is another important factor in this sustainability.</p> <p>In looking at the slope map for our farm, most of the slope areas deemed to be highly erodible are already planted out and fenced off. There is a small amount of area which we use to run youngstock on, no larger animals. At the bottom of these slopes the water way is fenced off and planted. We have engaged with Fonterra and have a Farm Environment Plan which helps guide us on dealing with potentially sensitive areas on the farm. We see this as a more sensible approach than blanket rules of stock exclusion or needing expensive resource consents.</p> <p>The majority of the waterways on our farm are fenced off and planted in natives through the KMR project and agreements. This is a continuing project, as we upgrade riparian plantings to more native species. We are careful to leave vegetation at the top of drains/waterways as a sediment trap. Increasing the setbacks of these water ways would be expensive to remove existing fences and reinstate, it would reduce valuable grazeable land and greatly reduce the economic potential of the farm. Increasing these setbacks would have questionable value to improving water quality.</p> <p>We have the view of being custodians of the land and want to leave the farm in a better state than when we bought it 29 years ago. With these values in mind, we are less inclined to need outside party's views and inputs on this matter. After this long on the farm, we have a very strong understanding of how it works, water flows, soil types and such likes.</p>
Jillian Wellwood	2, 6 - 8	<p>We farm 500ha of steep Northland hill country. Over 130 ha of that would be classed as 'Highly Erodible' according to the draft maps. Our most valuable and productive land is our 20ha of 'flats' which are all under 60m wide and have drains on both sides. Under the proposed 30 meter riparian stock exclusion zone these flats would have to be entirely excluded from grazing.</p> <p>We already have 34 ha of QEII covenanted native bush, plus a further 20 ha of exotic plantings on our steeper hills and riparian plantings around our farm water sources. We are allowing steeper faces to revert to manuka/kanuka and continue to fence off and plant riparian areas.</p> <p>I believe the council has underestimated the cost of stock exclusion on sheep and beef farms. 4 wire electric fences will not exclude sheep so 8 wire post and batten fences would be needed at twice the estimated cost. Practicalities of fencing on hill country would mean more land than intended would be fenced off to meet minimum exclusion zones as you can't simply draw a line on a map and then fence it.</p> <p>Most farmers are conservationists at heart. We live off the land and take pride in our stewardship of it. Farming is not a lucrative business, we are not here to get rich but we do earn a living, and work to improve our livestock, land, and environment while we are here.</p> <p>The proposed draft freshwater plan would require us to 'retire' 30% of our land and fence that off at our own cost. This would send us broke and force us off our land.</p> <p>Agriculture is vital to Northland and food production is essential to both NZ and the World. New</p>

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		Zealand farmers have the least environmental impacts of any farmers Worldwide. Work with us not against us, and don't implement rules that will destroy our livelihood.
Paula Whyte	2, 3, 5 - 12	<p>(Resource consents which have a negative impact on other properties)</p> <p>* As a dairy farm supplying Fonterra we have an extensive Environment Plan- which is specific to our farm, land, business, environment. I feel that this working document should be considered as meeting all the requirements of The Freshwater regulations. It is a living working document which we can alter and adapt as on farm conditions change. it is unique to our farm and land, making it relevant and fit for purpose.</p> <p>* We are situated downstream from the KDC Wastewater dam on Brown Road at Hakaru. NRC have given resource consent to the KDC to discharge wastewater from this dam into the creek that runs through our dairy farm- This granting of resource consents which negatively impacts the water quality that enters our property MUST stop! There cannot be one set of rules for the Public and then another for Councils. Councils must lead by example.</p> <p>* Fencing waterways - our waterways are fenced as a requirement of supplying Fonterra. We do not agree with making the buffer zones 3m, 5m, or 10m from the banks. We have put the fences along our water ways so we can access trees, to limb them, cut them up when they fall into the creek- so the water can flow unobstructed. Fencing our waterways out 10m and planting them would result in more flooding on our property as the vegetation planted would hold up the water flow when the flood waters rise. It would also be very difficult to get plants established in these areas due to yearly floods through winter- plants would get washed away. wasting money, time and resources.</p> <p>* Stock exclusion from slopes. We manage and care for our slopes through not disturbing the topsoil, through grazing them in the right weather and soil moisture conditions- e.g. limited in winter. We graze our younger stock on the hills in winter as they are lighter and we move stock every second day, so no damage is done to soil structure. We have fenced and planted our land areas which are not suitable for stock to graze or travel on.</p> <p>* I have nothing against things Māori, but it is not realistic to be asking landowners to get local iwi to give input if they are seeking a resource consent to do something on their own land. Our farm has been in our family for 60 years and we LOVE our Land and WE look after it. We have poured our energy, physical, emotional, financial, into this land- no one else. Why should we have to now be asking or consulting or getting approval from some other people- no matter what their association is to do something to develop our family land? We take pride in keeping our water ways healthy, our land and soil healthy and meeting the needs of our stock. We should be respected for this. We have a history with our land, of looking after it, developing it so it is a productive food producer. We know our land; we look after it- We should be respected for this- not expected to ask complete strangers who know nothing of our land for permission to do things on it.</p> <p>* No matter what rules are implemented through this Freshwater plan it is essential that NRC provide funding to assist landowners to work towards compliance of these rules and that the time frame set for these rules to become law is realistic and attainable for ALL landowners.</p> <p>* There must be some provisions in the rules/document for major weather events which have negative impacts on land and waterways. These should provide for landowners to have time to recover from these events - e.g. flash floods, cyclones, fires, etc. These can have huge negative impacts on our environment- they are not manmade, but we need to acknowledge they occur and that landowners will not be penalized but rather be supported in their recovery from these in terms of supporting their environment back to its healthy state- re fencing, re planting etc.</p> <p>* I do not agree with pine trees being planted all over slopes- If slopes are not suitable for the use they are being used for currently then they should be fenced properly and put back into native bush. Not planted in pine trees.</p> <p>* There is a lot of silt coming off gravel roads and roadside banks - ending up in drains and waterways- this will need to be addressed by NRC and Councils.</p> <p>Thank you for reading my feedback. I recognize this is not an easy task and we all want healthy water.</p>
Bronwyn Williamson	1 & 4	I would like the NRC to purchase my farm for the following reasons.

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		<p>Under the current targets identified in the Fresh Water plan changes our Farm will become Uneconomic and our business bankrupt.</p> <p>We have farmed for 43 years and managed our land and I consider we have endeavoured to care for it along the journey. We have kept weeds and pests at bay. Managed our waterways, Enhanced our native stands of Bush and preserved them. Produced overseas returns and in turn supported and created business for our Town of Dargaville.</p> <p>We are being told to walk away from 40 years of work without compensation at 67 years old so Mr Ruka can swim in the river really!!!???</p> <p>We have Freehold title and our rights to this are being Challenged by this ridiculous plan.</p> <p>If 250ha is retired from farming in Northland you need not worry about building a new State highway or relocating the Ports of Auckland.</p> <p>What will happen to the 250.000.00 ha? I can tell you. It will be covered in Gorse, pampas, ragwort, thistles and every goddam weed you can think of. Pigs and opossums goats rats and the like. The remaining pasture cover will deteriorate causing the land to slip and open up to erosion and become a huge fire risk. It would take 200 years to reestablish mature native forests.</p> <p>If 250.000 ha is taken out of farming what are you going to do with it? Where is the plan for retired land in the freshwater proposal? This would create a weed and pest corridor like the Railway lines State highways and any Doc-controlled land. You may as well seal off Northland and we can climb back into our Sailing Ships and return to England the Maori can paddle down the saved rivers in their Waka. How can the NRC Board even consider putting this in their freshwater plan? They all need to be sacked.</p> <p>See you in Court with Class Action from all the Freehold Tittle landholders regarding compensation and our Freehold rights.</p> <p>This amounts to theft of our freehold titles.</p> <p>250 ha in Northland is requisitioned to have the potential to consented to graze.</p> <p>Who pays?</p> <p>How long does consent last?</p> <p>Who monitors it?</p> <p>How much does it cost?</p> <p>Northland has the potential to become a giant weed and pest corridor and a huge fire risk. Just like the railways and state highways.</p> <p>Forget about our Freezing works, Dairy companies and four-lane highway.</p> <p>Forget about building new schools and upgrading the hospitals. Where do you think our Overseas earnings come from? The Sky? If you have no economy you have no money.</p> <p>Who baled this Country out in Covid and the last 50 years, Your Agri industries. Fonterra shone through and continues to. Yet you are forever trying to kick the last leg of the stool out from under us. Why.</p> <p>I have been told I could replace my business from Dairy to Honey, Carbon Credits or plant trees. Really??? That should work???</p> <p>I will starve to death while I wait for a return. Honey is not considered to be worthwhile in Northland now.</p> <p>Meanwhile, the bank has foreclosed and my business is bankrupted.</p> <p>Sediment from Forestry and the planting of Exotic trees has caused and has greatly shifted our ecological balance in Northland.</p> <p>Your freshwater plan is unrealistic, outrageous and beyond reason. Show me the Science.</p>
Robert Willoughby	4, 6, 7, 10 & 12	<p>(Unsealed road sedimentation infecting clean streams and native waterways)</p> <p>The 3 waters program is coming back to be run by councils. Can councils adequately support a 3 waters program and the consequences of raising public financing to undertake such programs. Northland is made up of rural communities living independently from town supply. Is it planned to upgrade household water supply and waste water disposal and put that infrastructure cost onto the household and then tax household usage?</p> <p>Population changes and growth migration puts demand on more housing. Housing needs supporting infrastructure and urban design high density living is out of step with our rural community settings.</p>

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		<p>I can see the draw down of natural water supplies being accumulated into fresh water dams to service growing demands. Already our current water sources are under stress and the cost of tanker supplies to Rawhiti is \$800 per load?</p> <p>Stemming effluent flows from farming and ariel flows and riparian plantings is supported. So too is forest residue. Some thought needs to go into recycling forestry slash into power and gas conversion creating power independence for Northland. But just to leave forestry slash on site only ends up into our rivers and streams. effluent flows</p> <p>Unsealed roads is another pollution issue for our clean streams. Unsealed roading seems to be valued on budget capitulation and not consequences. If our 3 waters strategy is valued in the same way then are our unsealed roading priorities will not be addressed anytime soon and the sedimentation that flows into our streams will continue to pollute our foreshore and seabed.</p> <p>The natural clean water streams feed into the seas, the waters carry nutrients that maintains life cycles of a number of species that feed into our oceans. As a community we value our clean streams and our native environment. All of our rural Northland communities rely on water self-sufficiency. Centralising the 3 waters strategy offered security, but going back to councils may have to be funded locally. We would be interested in the future 3 waters strategies for Northland and particularly in the rural sectors.</p>
Garry Wilson	1, 2, 5 – 7 & 10	We feel that by our fencing and our management of the land that we are already doing what's best for our property and don't feel that we need to be told what to do when it comes to this. It shouldn't be a blanket approach for everyone. Most farmers already have their own environmental plans either with Fonterra or the council and that should be enough
Holly Windelborn	12	Cleaning the local (Fairburn) awa - absolutely clogged with oxygen weed and trees/debris
Danny Woodcock	2, 5 - 7	<p>The stock exclusion from hill sides are a concern for me and a concern for Northland. A lot of the slopes I farm have natural sediment catches before any waterways. I understand risk slopes in Gullies need to be managed, but not every slope is equal. Looking at animal movements, they do not spend much time on the slope itself.</p> <p>The industry is taking steps through farm environment plans to address these issues. Buy putting consent in the middle, it drives frustration, cost, and uncertainty. I fear it will halt progress, and will make marginally farms unprofitable. Pine trees will be put in, which is not the answer our community wants.</p> <p>We have spent a lot on waterways. Are we going to have to move these out?</p> <p>There is a lot of flood land in our catchment. The more trees around waterways prone to flooding, the more debris gets caught. Costs escalate, and it becomes an extra burden on everyone. It will create silt traps, effectively creating higher land around the waterways. This has a big impact on our ability to use a drainage system to let water out.</p> <p>I am not in favour of needing consent to do every little thing. What can we do to allow farmers to farm sustainably without having to use consents? Between current inspections and Fonterra inspections, there are already a means of policing effluent management. Don't put more road blocks in place. I do not get the Tangata Whenua consultation process. Again, this is another layer of bureaucracy, cost and frustration.</p>
Greg Yuretich	6	<p>I am against the 10m setback on water ways.</p> <p>I have undertaken a fair amount of fencing on all of my properties. We have done this in a way that allows us to manage weed and pest burdens. With the drainage of the area, it is very important that I can get in and clean these drains. Without this maintenance, it puts the entire region at risk.</p> <p>The Council has to also be able to get in and manage the drainage under the regional drainage scheme. By putting 10m in, this hugely impacts anyone's ability to manage and maintain.</p> <p>I agree with the fencing of water ways and encourage all land owners to do it, but it has to be practical.</p>
(Name withheld)	2, 4 – 7 & 11	<i>Privacy Statement: Please note that I do not consent to my name and contact details being made public</i>

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		<p>I am making this submission as a farmer and as a rural professional who looks after the finances of farmers throughout Northland. My husband is a third-generation farmer and has watched as land use has changed from small dairy units (100 acres,) to conversion to sheep &amp; beef, and forestry plantation.</p> <p>The proposed changes excluding stock from erodible land are simply unworkable and for most farmers financially and leaves many with uneconomic properties. The suggestion that this could be offset by earning carbon credits is also unrealistic. How do you expect farmers to afford the planting costs, and how will they pay bills until ETS credits accumulate to be redeemed as income replacement? What do the future generations do with a farm that will have less productive grazing land and no further accumulation in credits?</p> <p>I urge NRC to visit recently harvested production pine sites and witness first-hand the amount of erosion caused. We are witness to a recent harvest and the erosion caused by this would exceed our farm's total erosion over the time of multiple generations of farming. Pine plantations are not the answer!</p> <p>My husband has watched the stream water quality drop with land use change to forestry. When the trees were mature smaller creeks simply stopped running as the trees drew on the water supply for their growth.</p> <p>After Cyclone Gabrielle we had one slip on the farm, and it was an area of mature native bush. The steep hills that have kikuyu grass held well and we utilise poplar trees to stabilise hillsides already. A blanket stock exclusion policy fails to recognise each farms unique situation.</p> <p>I view the profit and loss of multiple family-owned farms and the costings you have provided exceed the farm surplus for many farmers.</p> <p>Based on the mapping that the KMR field advisor provided approx. 50% of our land would have to be retired from cattle grazing (they were also surprised how inaccurate their maps were).</p> <p>If NRC proceed with this unworkable plan landowners should be financially compensated with NRC paying full market rates per ha.</p> <p>Farmers are already working to fence (or have already fenced) waterways. NRCs proposed set back plans will be a further cost that will impact farm productivity and profitability. NRC would be better to spend effort &amp; time visiting farms to check fencing is being done and working with farmers 1:1 to achieve outcomes that improve what is currently in place and is within the landowner's individual financial means. Flexibility is required.</p> <p>NRC should not propose rules that exceed government regulations.</p> <p>I do not support landowners having to apply for resource consents to continue their existing farming operations (e.g., farm livestock on hill country). This is just a further layer of bureaucracy &amp; red tape, and erodes property rights of the owner/s.</p> <p>As a person of Māori and European descent I do not see any benefit in obtaining cultural impact assessments for farming consents. Do I write my own?</p> <p>I hope that NRC seriously consider the impact on farmers and the economic value farming provides Northland. Farmers I talk to strong emotional ties to their land and want to protect both environment and their livelihoods for future generations. We need to implement changes slowly and thoughtfully.</p>
Melissa Arseneault		<p>Our freshwater environment is under pressure. These pressures lead to changes in the state of the environment – and these changes have impacts on ecosystems, our lives, and things that are important to us.</p> <p>The MfE, Stats NZ report 'Our Freshwater 2023' highlights:</p> <p>The water quality of some of our rivers and lakes could be harmful to ecosystems and human health.</p> <p>Our freshwater quality is mixed, with some excess nutrient levels that can harm ecosystems.</p> <p>The quality of some of our freshwater is unsuitable for recreational activities like swimming.</p> <p>The quality of some of our groundwater is unsafe for drinking.</p> <p>Many of our indigenous taonga freshwater fish and invertebrate species are threatened with extinction or at risk of becoming threatened.</p> <p>Many of our indigenous freshwater bird species are threatened with extinction or at risk of becoming threatened.</p>

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		<p>Much of our historic repo extent has been converted to other land uses, and repo loss has continued, reducing habitat for dependent native species.</p> <p>(This work uses material sourced from the Ministry for the Environment, Stats NZ, and data providers, which is licensed by the Ministry for the Environment and Stats NZ for re-use under the Creative Commons Attribution 4.0 International licence.)</p> <p>It is alarmingly clear that significant changes and actions are urgently required to improve the current state and health of our freshwater in Northland.</p> <p>I appreciate and understand the impacts these proposed changes will have, particularly on landowners and farmers and that the cost of implementation and compliance to improve the current state of our freshwater is at the centre of the decision-making process of these plan changes.</p> <p>However, the economical, ecological, and social costs associated with the current state of our freshwaters are greater than the changes proposed. The state of our freshwater is at a crisis point and we can no longer delay essential changes urgently required to improve freshwater in Northland.</p> <p>The key challenge is how do we fund these changes. Yes, more funding needs to be allocated in NRC annual budgets and LTP's but more importantly we need to look at other opportunities and options to enable and assist with this work. There is an opportunity to establish a new entity or a subgroup within an existing charitable trust and/or incorporated society who's aim would be to work alongside NRC, local landowners and mana whenua to assist and/or provide support, knowledge, expertise, materials and/or labour associated with riparian planting, fencing, weed control, etc. We have a number of excellent examples of not-for-profit organisations that are doing amazing conservation work throughout Northland the same principles could be applied to engage and enable local individuals, communities, and organisations to be actively involved in working to improve the health of our freshwater. I am happy to meet with anyone to discuss in more detail how I believe this could be achieved. Regarding the proposed draft changes, I see stock exclusion, riparian planting, the protection and restoration of wetlands as the most urgent and critical changes required to ensure essential progress is made on improving our freshwater.</p> <p>I support that rules in the regional plan should require stock to be excluded from mapped areas of severe erosion risk (highly erodible land 2).</p> <p>I support the planting of highly erodible land in permanent native forest and claiming the carbon credits.</p> <p>I support new rules limiting vegetation clearance, cultivation and earthworks in areas of high erosion risk, with tighter controls applied to these activities in areas with severe erosion risk.</p> <p>I support all stock to be excluded from all hill country wetlands within five years or sooner (not 10).</p> <p>I support that setback distances for keeping stock away from all permanent and intermittently flowing rivers, streams, outstanding waterbodies, high value dune lakes and/or lakes and wetland areas should be as follows:</p> <p>where there is currently no fencing a setback requirement of ten metres should be set for priority areas (including high erodible areas and areas that would benefit from bank stabilisation) to achieve the maximum wider ecosystem health and climate change resilience benefits by 2029 (five years)</p> <p>where there is currently no fencing a setback requirement of 5 metres is set for low priority areas where stabilising banks is not necessary by 2029 (five years)</p> <p>where landowners have taken positive action to protect freshwater and there is existing fencing (minimum 3 metres to 5 metres setback) in priority areas (including high erodible areas and areas that would benefit from the fencing setback requirement of 10 metres would be implemented to achieve the maximum wider ecosystem health and climate change resilience benefits by 2039 (15 years). where landowners have taken a positive step to protect freshwater and there is existing fencing (minimum 3 metres up to 5 metres) in low priority areas, any new fencing setback requirements of 5 and/or 10 metres would not apply to these areas. priority areas would need to be assessed by NRC through the establishment of a rating system that would be circulated for public consultation.</p> <p>I support that all stock exclusion areas around all waterways to be replanted with native riparian vegetation within three years upon completion of fencing set back requirements and/or for existing fencing. Exotic forests can affect sensitive waterbodies such as high-value dune lakes by reducing the amount of water they receive. The harvest of plantation forests can result in sediment loss to waterways. Therefore, I support the draft rule changes to require larger setbacks for exotic carbon and</p>

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1	The vision, objectives and/or targets for our freshwater future	7	Stock exclusion – highly-erodible land
2	Managing highly-erodible land	8	Timeframes for stock exclusion rules
3	Eliminating discharges to water	9	Managing water allocation
4	Managing exotic forests	10	Enabling tāngata whenua to practice as kaitiaki for wai
5	Managing impacts on tāngata whenua values	11	Support and funding for efforts to improve freshwater
6	Stock exclusion – distance from waterways	12	Something else

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		<p>plantation forestry from waterways and require resource consent for plantation forestry and exotic carbon forests in high-value dune lake catchments.</p> <p>Between 1996 and 2018, 87% of New Zealand freshwater wetland area loss occurred with conversion to exotic grassland and human activities, especially clearing native forest and draining wetlands for agriculture, have worsened erosion in Northland and increased sedimentation in our rivers and estuaries. All remaining wetland areas in Northland require more protection and enforcement. Therefore, I support the inclusion of fencing setbacks of 10 metres for wetland areas to reduce faecal contamination and to protect these areas.</p> <p>I support new rules that support the development, restoration and riparian planting of wetlands.</p> <p>I support the constructing of wetlands in headwater catchments.</p>

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4 Managing exotic forests	10 Enabling tāngata whenua to practice as kaitiaki for wai
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