West Coast Regional Council

National Policy Statement for Freshwater Management

Regional Implementation Strategy

Version 2. JUNE 2019

THE WEST COAST REGIONAL COUNCIL

Contents

1. Introduction

Fresh water is essential to New Zealand's economic, environmental, cultural and social well-being. Fresh water gives our primary production, tourism and mining sectors their competitive advantage in the global economy. Fresh water is highly valued for its recreational aspects and it underpins important parts of New Zealand's biodiversity and natural heritage. Fresh water has deep cultural meaning to all New Zealanders. Many of New Zealand's lakes, rivers and wetlands are iconic and well known globally for their natural beauty and intrinsic values.

The Treaty of Waitangi / Te Tiriti o Waitangi is the underlying foundation of the Crown-iwi/hapū relationship with regard to freshwater resources. Addressing tangata whenua values and interests across all of the well-beings, and including the involvement of iwi and hapū in the overall management of fresh water, are key to giving effect to the Treaty of Waitangi.

New Zealand faces challenges in managing our fresh water to provide for all of the values that are important to New Zealanders. The quality, health, availability and economic value of our fresh waters are under threat.

To respond effectively to these challenges and issues, we need to have a good understanding of our freshwater resources, the threats to them, and provide a management framework that enables water to contribute both to New Zealand's economic growth and environmental integrity and provides for the values that are important to New Zealanders.

Freshwater planning will require an iterative approach that tests a range of possible objectives and limits, and methods for their achievement. This ensures that the implications of proposed freshwater objectives are clear for Council and communities.

The National Policy Statement for Freshwater Management (NPSFM) recognises Te Mana o te Wai and sets out objectives and policies that direct local government to manage water in an integrated and sustainable way, while providing for economic growth within set water quantity and quality limits.

The NPSFM recognises iwi/hapū and community interest in fresh water, including their environmental, social, economic and cultural values. There are two compulsory values that must be managed for - ecosystem health and human health.

Iwi and hapū have a kinship relationship with the natural environment, including fresh water, through shared whakapapa. Iwi and hapū recognise the importance of fresh water in supporting a healthy ecosystem, including

human health, and have a reciprocal obligation at kaitiaki to protect freshwater quality.

The NPSFM requires freshwater quality within a freshwater management unit (FMU) to be maintained at its current level (where community values are currently supported) or improved (where community values are not currently supported). For the human health value, water quality in FMUs must be improved unless regional targets have been achieved or naturally occurring processes mean further improvement is not possible. This NPS allows some variability in terms of freshwater quality, as long as the overall freshwater quality is maintained within a FMU.

Monitoring plans are intended to be practical and affordable. It is not possible for regional councils to monitor every drop of water, nor every possible indicator of freshwater health. Monitoring freshwater objectives need only be undertaken at representative sites within a FMU as identified by regional councils and must use the Macroinvertebrates Community Index, as well as measures of indigenous flora and fauna and Mātauranga Māori. Monitoring plans are also intended to recognise the importance of long term data.

Setting enforceable quality and quantity limits is a key purpose of this NPS. This is a fundamental step to achieving environmental outcomes and creating the necessary incentives to use fresh water efficiently, while providing certainty for investment. Water quality and quantity limits must reflect local and national values. The process for setting limits should be informed by the best available information and scientific and socio-economic knowledge.

Once limits are set, freshwater resources need to be allocated to users, while providing the ability to transfer entitlements between users so that we maximise the value we get from water. Where water resources are over allocated (in terms of quality and quantity) to the point that national and local values are not met, over-allocation must be reduced over agreed timeframes.

The New Zealand Coastal Policy Statement 2010 addresses issues with water quality in the coastal environment. The management of coastal water and fresh water requires an integrated and consistent approach.

2. Background

The NPSFM was gazetted in 2011. The primary responsibility for implementing the NPSFM lies with regional and unitary councils[1], who must give effect to the NPSFM in planning documents, report on their progress, and fully implement the NPSFM no later than 31 December 2025.

Based on an initial review in 2011, the West Coast Regional Council (WCRC or the Council) concluded that the NPSFM objectives appeared to align well with the Proposed Land and Water Regional Plan objectives. At this stage it was considered that no significant additional planning or other work was required to meet the NPSFM's requirements.

An amendment was made to the NPSFM in 2014 which introduced the National Objectives Framework (NOF) and national bottom lines for water quality. These amendments require Councils to determine how their communities value these waterways and what goals should be set for the future, based on economic, social, cultural and environmental factors. Subsequently the condition of these values must be assessed using empirical accounting methods, for example, monitoring and catchment modelling of waterbody state and trends. A key component of the NPSFM is the requirement that the overall quality of freshwater must be maintained or improved. Deteriorating trends must be addressed.

A further amendment to the NPSFM was released in August 2017. The amendment introduces a number of changes to the document, the most significant of which is the requirement for regional councils to work towards, and report on, the progress of achieving the Government's national target of making 90% of New Zealand's large rivers and lakes swimmable by 2040.

The WCRC monitoring network has historically focused on catchments where water quality is affected by human activity. Based on those results, we understand the majority of our rivers to be healthy with a smaller number that would benefit from improvement. What we do not know is how our communities value their freshwater resources, whether our monitoring framework accurately reflects the communities' values, and what goals the community believe should be set for the future of those waterways. These are key components of the NPSFM.

In addition, there are other related aspects of the NPSFM that the Council is required to address but has not yet done, including the requirement to identify FMUs, set objectives and limits for freshwater quality and quantity within those units and to undertake freshwater accounting.

[1] The Resource Management Act 1991 requires Regional Councils to give effect to National Policy Statements in Regional Policy Statements and Regional Plans (Sections 62 and 66 respectively)

In early 2016, in response to increasing awareness that more needs to be done to give effect to the requirements of the NPSFM, an implementation team was formed. The team consists of staff from Resource Science (hydrology and water quality), Consents and Compliance and Planning departments of the Council.

This document sets out the recommendations of the Implementation Team and explains what the Team believe needs to be done in order to give effect to the NPSFM in accordance with Sections 62 and 66 of the RMA.

3. What needs to be done and why?

The NPSFM sets out a number of objectives and policies to be implemented. Key requirements of the NPSFM are as follows:

- Identify Freshwater Management Units (FMUs) to include all freshwater bodies in the region (Policy CA1).
- To recognise and provide for Te Mana o te Wai in the management of fresh water. Te Mana o te Wai recognises the connection between water and the broader environment – Te Hauora o te Taiao (the health of the environment), Te Hauora o te Wai (the health of the waterbody) and Te Hauora o te Tangata (the health of the people) (Policy AA1).
- Involve Poutini Ngāi Tahu in the management of freshwater, working with Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makkawhio and Te Rūnanga o Ngāi Tahu to identify tangata whenua values and interests and reflect these in the management of, and decisions-making about, freshwater (Policy D1)
- Working with Poutini Ngāi Tahu and the wider community to develop objectives and set freshwater quality and quantity limits for all FMUs (Policy A1 and CA2)
- Working with Poutini Ngāi Tahu to ensure that those objectives maintain or improve the overall freshwater quality within each FMU (Objective A2)
- Working with Poutini Ngāi Tahu to develop a monitoring plan for achieving objectives (Policy CB1)
- Establish and operate a freshwater quality and quantity accounting system (Policy CC1)
- Amend the Regional Land and Water Plan to the extent needed as per NPSFM policies.

An overview of the process is illustrated in the figure below:

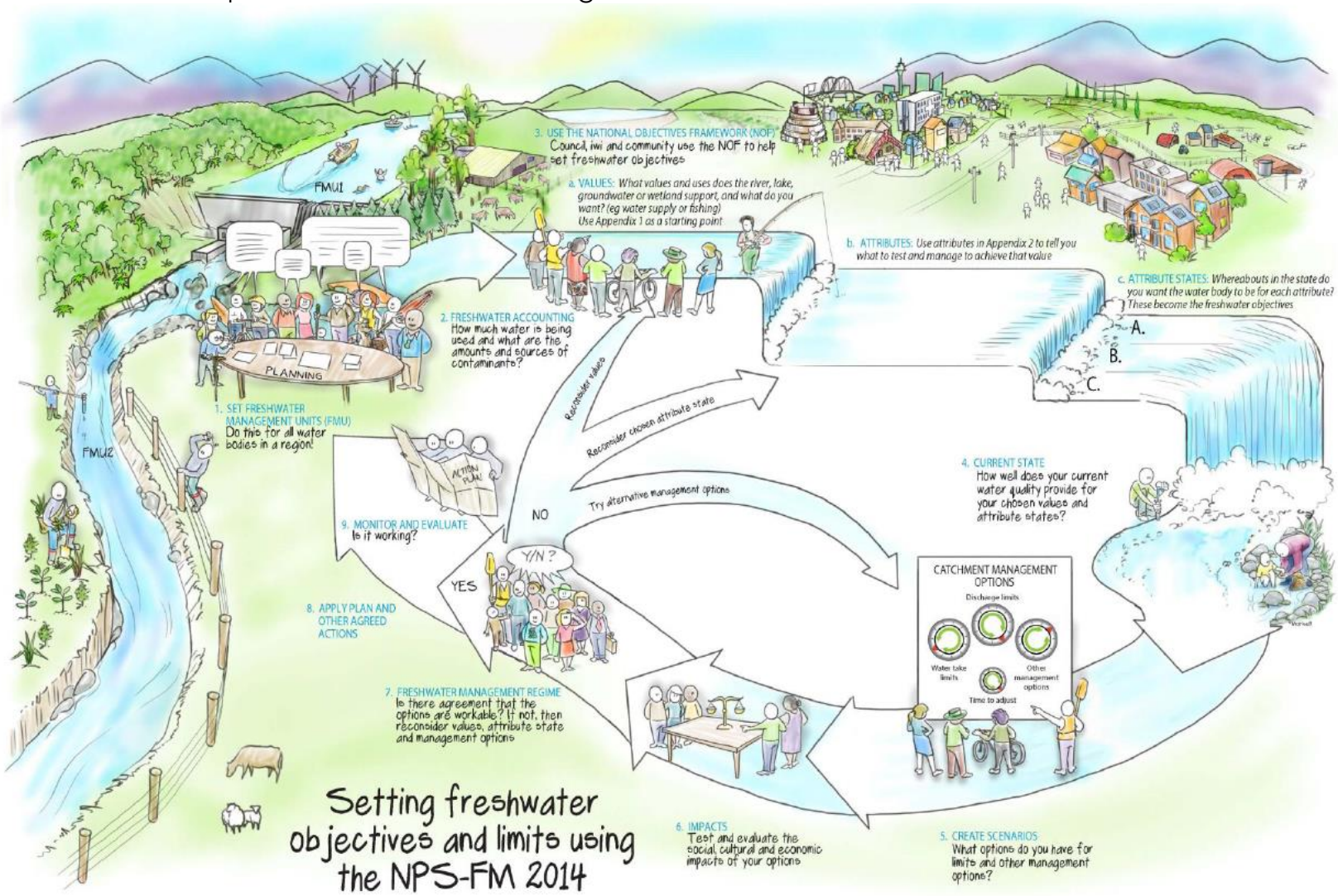


Figure 1: pg. 63. MfE. 2015. A Guide to the National Policy Statement for Freshwater Management 2014. Wellington: Ministry for the Environment.

To date, the WCRC has not formally committed any extra resources toward achieving any of the requirements above as water quality and quantity is not seen to be an issue locally given the state of our water quality and quantity. However, having good water quality or quantity does not obviate the Regional Council from our responsibility to implement the NPSFM. The NPSFM represents a fundamental shift in the way we are expected to manage freshwater. It provides a framework for the way regional councils must manage their fresh water resources now and into the future. The legislative requirement to give effect to the NPSFM exists regardless, and pressure to do more in this area will continue to increase. As more and more is achieved around the country, the absence of any progress on the West Coast will become more apparent. Many regional councils around the country have moved beyond the planning phase and are now in what is being described nationally as "the implementation phase". In recognition of this, the Ministry has also shifted its focus and is now focusing on implementation.

As regional councils around the country work toward implementation of the NPSFM, many investing significant amounts of time and energy into addressing the NPSFM's requirements (see preceding section of this report), this has the effect of raising the bar and increasing public expectations. More and more, external parties are asking what the WCRC is doing to implement the requirements of the NPSFM.

The Council received numerous submissions[2] in opposition to the Proposed Regional Policy Statement, criticising the failure of the document to give effect to the NPSFM. Staff have responded to these submissions by propose to making revisions to the Land and Water chapter of the Proposed Regional Policy Statement to provide greater detail on the NPSFM implementation.

Under Section 79 of the RMA, Regional Councils must commence a review of any provision within the Regional Policy Statements or Regional Plans, no later than 10 years after they previously became operative. Policies relating to freshwater (excluding wetlands) were last reviewed when the Proposed Water Management Plan, Proposed Land and Riverbed Plan and the Regional Plan for Discharges to Land were merged and notified in September 2010. The majority of the provisions became operative in October 2012, with the entire Plan becoming operative in 2014 following the resolution of the appeals relating to the wetlands.

In order to meet the 10 year deadline for review, work on reviewing the L&WP needs to commence now and be carried out over the next few years. The Regional Council will not be able to carry out a successful review of the Plan unless more work is carried out to address the requirements of the NPSFM.

[2] Submissions requesting more direction on how the WCRC will implement the NPSFM received from the Environmental Defence Society, Federated Farmers New Zealand, Department of Conservation, Trustpower, Straterra, Forest and Bird, joint submissions of Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio and Te Rūnanga of Ngāi Tahu and a number of individual submitters.

Local Government New Zealand stated in 2015[3], that on average, it has taken 6.3 years after a district plan has been notified for it to become operative, 6.1 years for a regional plan, 4.4 years for a regional policy statement and 2 years for a plan change. Based on our own experience, these timeframes are optimistic. Council agreed to commence a review of the Regional Policy Statement in 2009, and hearings have taken place, with appeals currently underway (ten years taken to date). Similarly, Council agreed to commence review of the Regional Coastal Plan in 2010 and hearings are likely to take place-this year (nine years taken to date).

Given the amount of work required to implement the key requirements of the NPSFM, including the need to work with Poutini Ngāi Tahu and engage with communities, and based on our own experience, and the experiences of other regional councils that are more advanced with implementation, it should be noted that developing the evidence base for any review of policies and rules related to freshwater will take some time. As such, the need to start work in this area is becoming urgent.

[3] LGNZ. 2015. A 'blue skies' discussion document about New Zealand's resource management system. Retrieved 1st August 2017 from www.lgnz.co.nz/assets/Uploads/LGNZ-blue-skies-thinkpiece-Dec-2015.pdf

4. What is everyone else doing?

In May 2017, MfE published a document titled 'National Policy Statement for Freshwater Management Implementation Review – National Themes Report'[4]. The purpose of this document was "To provide a stocktake of progress made by regional councils toward setting objectives and limits for freshwater resources in their region as required by the NPSFM" (pg. 6). The information and analysis underpinning the Review used evidence collected via questionnaires completed by each of the regional authorities, interviews with council executives and elected councillors, senior council staff, iwi, and stakeholder representatives and reviews of regional planning documents.

A summary of each Council's approach to implementation is included in Appendix 1. Based on the information set out within this document, it is clear that the WCRC is one of the Councils that have made the least progress to date.

The Review document describes the approach taken by the WCRC as follows:

> "West Coast Regional Council considers that the existing regional plan met the requirements of the NPSFM 2011, but needs to undertake work to implement the 2014 amendments. Though the Council intends to address implementation on a catchment by catchment basis, it has not yet prioritised catchments or established a timeline for planning".

In respect of NPSFM implementation, the Review concludes the following:

- Regional council progress implementing the NPS-FM varies across the country; many councils have made good progress to identify objectives and set limits. However, and not unexpectedly, no council has implemented the NPS-FM in its entirety.
- Some councils have made good progress through the implementation process including Horizons, Canterbury, Waikato, and Otago. Others, however, have made much less progress.
- Regional councils cannot wait around to gather information while waterways continue to decline. Putting such problems off will not make their resolution easier and simply exacerbates the environmental problem. To do so is to fail to implement the NPS-FM and to undertake statutory functions.

[4] http://www.mfe.govt.nz/sites/default/files/media/Fresh%20water/npsfm-implementation-review-national-themes-report.pdf

- Region-wide default limits are appropriate in some situations and can help ensure that action is being taken while catchment-specific provisions are still being developed - but they may not be appropriate where the total of catchment inputs on particular water bodies is not understood (pg. 23).

As part of the National Implementation Review carried out by MfE, regional summaries have also been prepared. The recommendations from that summary for the West Coast region are as follows:

- WCRC, iwi, stakeholders and the community generally agree that they have good working relationships and want to ensure these continue through any freshwater decision-making processes.
- In order to fully implement the NPSFM 2014, it is recommended that WCRC continues to work with iwi, stakeholders and the community to identify FMUs, values and limits for its freshwater resources.
- WCRC should consider working in the most stressed FMUs first. It could set region-wide policy for the management of low pressure areas, for example, the conservation estate, and initiate community processes for identified high pressure areas or issues within the FMUs.

5. What should we do?

One of the benefits of starting later is that we can learn from the experiences of other regional councils. Some councils have invested significant amounts of money and have made limited progress. We want to avoid making the same mistake. Given the size of our rating base, we need to make sure that the work we do counts.

Additionally, given we do not have the same pressing issues with water quality and quantity that are experienced in other parts of the country, we need to make sure that our commitment to this process is commensurate with the issues we are facing locally. That means we have the ability to tailor our approach to suit our own situation.

The Implementation Team have reviewed what has been done elsewhere and recommend developing a proposal that is locally responsive. Implementation of the NPSFM needs to focus attention on areas where we know we have issues (water quantity issues in the Grey Valley for example), and directs resources at these areas. Areas where we expect we will have less work to do (South Westland for example), should be left till last, and should benefit from a process that is streamlined and less involved.

6. Cultural Importance and Management of Water

"He taura whiri kotahi mai ano te kopunga tai no i te pu au"

"*From the source to the mouth of the sea, all things are joined together as one*"

Water is an essential and integral part of the connection between Poutini Ngāi Tahu, as mana whenua, and their tribal territory. Council recognises that Wai Māori/fresh water is a tāonga for Poutini Ngāi Tahu. The life-giving and life-sustaining properties of water are intrinsically linked to the spiritual, cultural, economic, environmental and social well-being, survival and identity of Poutini Ngāi Tahu whānui.

The Council understands that addressing mana whenua values and interests is essential. The Council recognises that working with Poutini Ngāi Tahu in the overall management of water on the West Coast is key to giving effect to the Treaty of Waitangi and the RMA.

The principles in this section have been provided by Poutini Ngāi Tahu and are intended to guide freshwater management discussions in a manner consistent with mana whenua cultural values and interests:

- Water management effectively provides for Te Mana o te Wai and the tāonga status of water, the Treaty partner status of Ngāi Tahu, the importance of water to cultural well-being, and the specific interests and kaitiakitanga responsibilities of tangata whenua for water.
- Pounamu is a tāonga of utmost importance to Poutini Ngāi Tahu culture and tradition. Water is managed to ensure the relationship between Poutini Ngāi Tahu and the collection of pounamu is maintained.
- Water and land are managed as interrelated resources embracing the practice of *Ki Uta Ki Tai* (from the mountains to the sea), which recognises the connection between land, groundwater, surface water, coastal waters and the passage of water from mountains to the sea.
- Water quality and quantity in groundwater and surface water resources in the takiwā enables customary use.
- Recognise the preference of discharges to land over water.
- Prioritise efficient use of waterand establish culturally sustainable flow regimes.
- Mauri and mahinga kai are recognised as key cultural and environmental indicators of the cultural heath of waterways and the relationship of Poutini Ngāi Tahu to water.

- Water use in the takiwā respects catchment boundaries as much as practically possible.
- Wetlands, waipuna (springs), estuaries, hāpua and lagoons are recognised as wāhi taonga.
- Cultural monitoring tools are used to monitor the health of waterways.

7. Identifying Freshwater Management Units (FMUs)

Given the size of the Region and the vast differences between areas within the Region, it is recognised that the objectives and limits in some areas will not be appropriate in others (for example the rules that have been applied in the Lake Brunner catchment would not be appropriate everywhere). This is provided for within the NPSFM by allowing regional councils to separate their region into Freshwater Management Units (FMUs).

The NPSFM and its associated guidance[5] allow regional councils flexibility in how they go about identifying FMUs. The guidance does note, however, that the scale of the FMU needs to be appropriate for objective and limit-setting, freshwater accounting, and monitoring. An FMU should not be set at too large a scale, which may prevent the setting of freshwater objectives that are specific enough to be effective. Equally, an FMU should not be set at too small a scale, which may result in undue complexity and cost in the planning process or in the management of the FMU. Separate management areas can be identified within an FMU for certain values and / or different management processes.

Some councils have taken an aggregating approach to determining management units or zones; others have sub-divided the region to a much greater extent. This means that the number of water management zones or FMUs in one region can vary from around two to five, to dozens in other regions. These different approaches to FMUs are appropriate given the differences in the physical environments from region to region and differing pressures.[6]

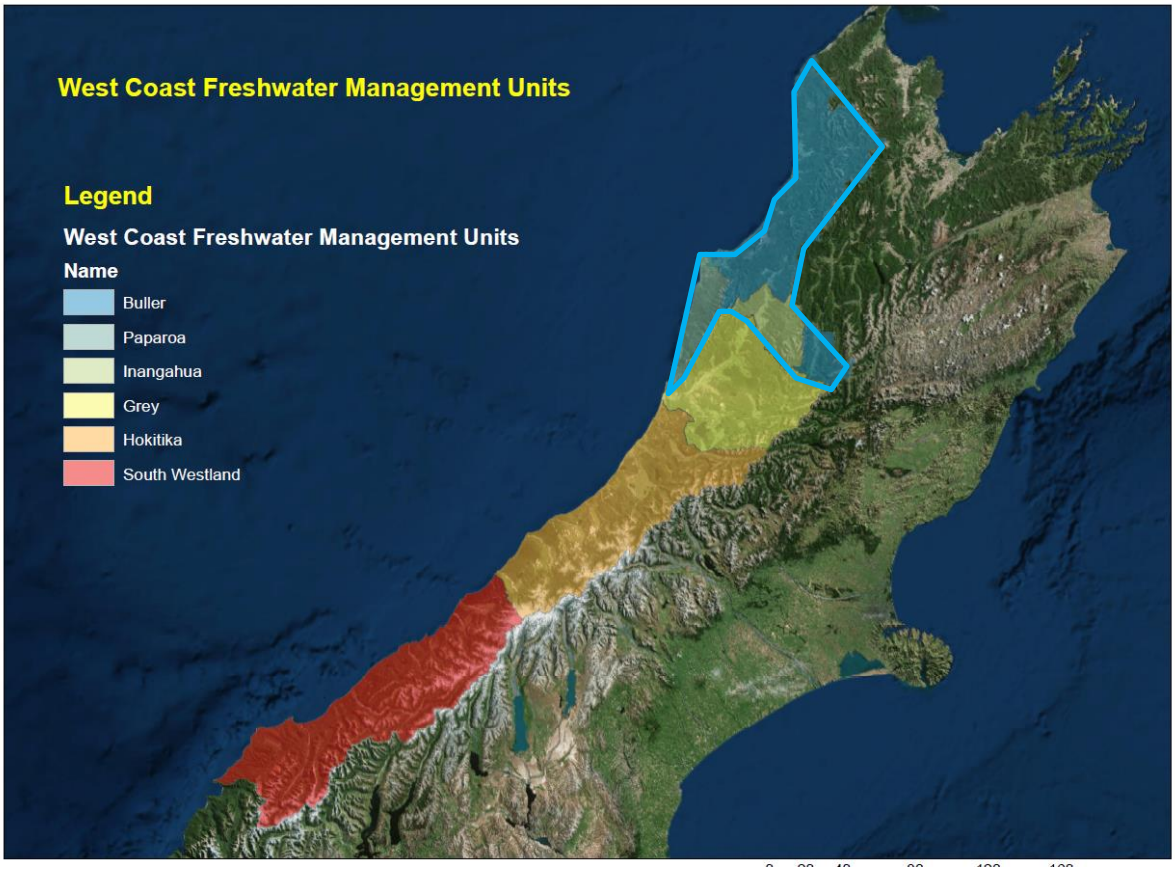
The Implementation Team has considered the options and what has been done elsewhere around the country. The Team initially proposed to divide the Region into six FMUs based on geographical groupings of similar land uses and/or activities. The FMUs take into account existing monitoring sites and community boundaries. Consideration was given to defining FMUs by

[5] Ministry for the Environment. 2015. A Guide to the National Policy Statement for Freshwater Management 2014. Wellington: Ministry for the Environment

[6] Ministry for the Environment. 2017. National Policy Statement for Freshwater Management Implementation Review National Themes Report. Wellington: Ministry for the Environment

catchment but this was discounted as impractical given the vast number of catchments in the Region. The Team also looked at defining FMUs by types of catchments (for example, combinations of land cover, altitude, source of flow, geology). This was less ideal given that communities and their values are likely to be centralised.

The six original FMUs are illustrated in the image below, with the blue line showing the boundary of amalgamated FMU (Buller, Inangahua and Paparoa FMU's):



Appendix 2 provides a more detailed map and short description of each FMU's likely values, issues, information we have and information we might need.

It is to be noted that the boundaries of the FMUs are not fixed and can be moved if this is considered necessary by Council or following engagement with our communities.

During a community information session for the Buller FMU (April 2019) there was a discussion about FMU boundaries. This discussion led Council to combine the Buller, Inangahua and Paparoa FMU's. Combining these three FMUs will enable values and limits throughout the Buller catchment to be considered at the same time. Amalgamating will enable the greatest efficiency of Council staff time and resources while still retaining community input. The amalgamated FMU will be known as the Kawatiri Freshwater Management Unit.

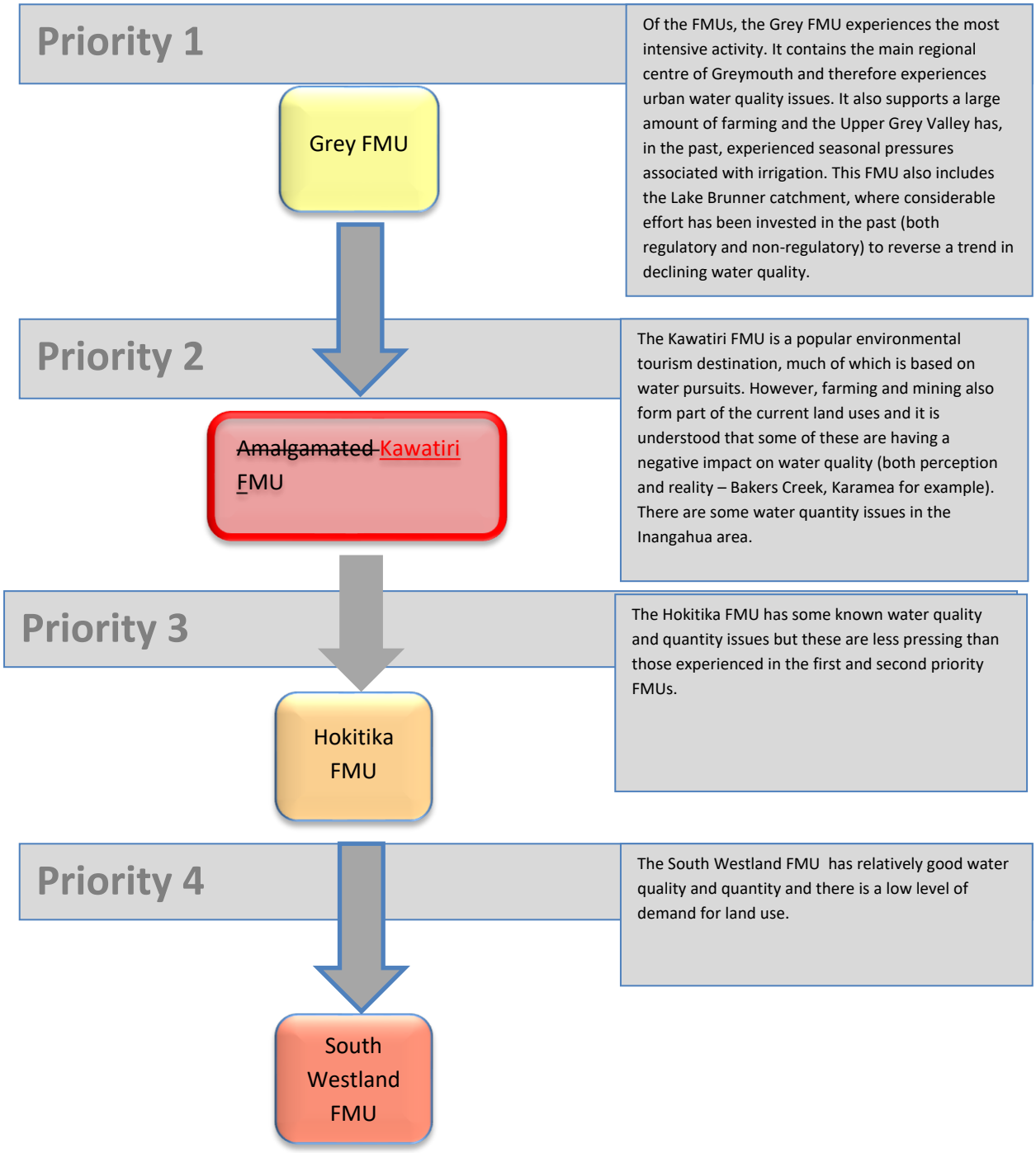
8. Prioritising Freshwater Management Units

Most councils have chosen their most challenging catchments to work in first, in terms of resource management issues and conflicts or pressures, including:

- Gisborne (Waipaoa),
- Waikato (Waikato/Waipa),
- Greater Wellington (Ruamahanga),
- Bay of Plenty (Rotorua Lakes),
- Northland (priority catchments including the Whangarei Harbour), and
- Canterbury (Selwyn and Te Waihora/Lake Ellesmere).

MfE endorse this approach, noting it is important that councils focus their efforts on hotspots, especially where there are sensitive receiving environments or where there are looming allocation issues (pg. 17, MfE, 2017). MfE have also made it known that their preference is for councils to tackle FMU's with the most important and at risk values first.

As with the boundaries of the FMUs, the priority level attributed to each of the FMUs is not fixed and could be moved if this was considered necessary by Council or following engagement with our communities. It may also be necessary to revisit priorities as issues change over time. Such a necessity occurred as a result of the Buller Community Information session in April 2019, as discussed in Part 7. The priority diagram on page 11 shows that the amalgamated FMU will now be set as the second priority


Priority 1
Grey FMU
Of the FMUs, the Grey FMU experiences the most intensive activity. It contains the main regional centre of Greymouth and therefore experiences urban water quality issues. It also supports a large amount of farming and the Upper Grey Valley has, in the past, experienced seasonal pressures associated with irrigation. This FMU also includes the Lake Brunner catchment, where considerable effort has been invested in the past (both regulatory and non-regulatory) to reverse a trend in declining water quality.
Priority 2
~~Amalgamated~~ Kawatiri FMU
The Kawatiri FMU is a popular environmental tourism destination, much of which is based on water pursuits. However, farming and mining also form part of the current land uses and it is understood that some of these are having a negative impact on water quality (both perception and reality – Bakers Creek, Karamea for example). There are some water quantity issues in the Inangahua area.
Priority 3
Hokitika FMU
The Hokitika FMU has some known water quality and quantity issues but these are less pressing than those experienced in the first and second priority FMUs.
Priority 4
South Westland FMU
The South Westland FMU has relatively good water quality and quantity and there is a low level of demand for land use.

9. Engaging with the community

Freshwater objectives seek to ensure that what is valued about each FMU will be maintained or enhanced. To understand what is valued, and therefore what needs to be achieved in each FMU, working with Poutini Ngāi Tahu and engaging with water users, and the wider community is essential.

Most councils have undertaken, or are embarking on, some form of collaborative or enhanced consultative process with their communities, as promoted by the NPS-FM Implementation Guide and the Land and Water Forum, but not explicitly required by the NPS-FM itself[7].

Engagement exists across a spectrum as illustrated in the diagram below:

	Inform	Consult	Involve	Collaborate	Empower
Goal	To provide balanced and objective information in a timely manner.	To obtain feedback on analysis, issues, alternatives and decisions.	To work with the public to make sure that concerns and aspirations are considered and understood.	To partner with the public in each aspect of decision-making.	To place final decision-making in the hands of the public.
Promise	"We will keep you informed"	"We will listen to and acknowledge your concerns"	"We will work with you to ensure your concerns and aspirations are directly reflected in the decisions made"	"We will look to you for advice and innovation and incorporate this in decisions as much as possible	"We will implement what you decide"

(Adapted from IAP2, Spectrum of Public Participation and pg. 29, MfE, 2017).

Traditionally, the consultation carried out by the WCRC in respect of planning documents has sat at the "inform/consult" end of the spectrum, meeting, but not exceeding, statutory requirements for public consultation. However, more recently, as part of the review of the Proposed Regional Policy Statement, the WCRC has been moving towards processes that "involve/collaborate" with key stakeholders. This new collaborative-style process has been well received by stakeholders and this reflects trends around the country.

[7] Ministry for the Environment. 2017. National Policy Statement for Freshwater Management Implementation Review National Themes Report. Wellington: Ministry for the Environment

Collaboration is increasingly being used to tackle complex resource management issues. Regional authorities are engaging stakeholders, communities and working with iwi/hapū early in the planning process as a way to resolve tensions over conflicting values, multiple interests, and increasing demands for fresh water. An engagement approach that emphasises the sharing of knowledge and working together at the front end of the planning process, through dialogue and discussion, is desired.

However, the costs involved in resourcing more collaborative processes can be significant, and should be a consideration when deciding what engagement process to choose. Collaborative processes are more resource intensive (staff and funding) than traditional plan making processes. Furthermore, collaborative processes take time as the group needs to be provided with the space and time to build trust amongst the group, to consider information, and reach a consensus.

Effort must also be made to ensure that Poutini Ngāi Tahu and all members of the community are represented and are able to have their voice heard. The groups need to make sure that regular progress reports about the groups' decisions are made to the wider community.

In order to understand what communities value about freshwater, it is the view of the Implementation Team, that an "involve/collaborate" type process will be required in each FMU. While the sky is the limit for collaborative involvement, and resource intensive management options, it is widely recognised that the degree of collaboration can be scaled to the issues associated with water management within each FMU. For example, in an FMU with few issues, the degree of collaboration could be scaled towards a more consultative approach. The same applies to the extent and complexity of accounting, objectives, and targets.

The Implementation Team recommends that a community engagement group (CEG) is established for each FMU who will consult with the local community and then work together to understand the issues in that FMU, identify values and provide a package of recommendations (including recommended objectives and limits where required) to Council for consideration. Those recommendations, if agreed, will form the basis of a plan change/review of the Regional Land and Water Plan. The CEG composition and operation will not be the same in every FMU. The composition and terms of agreement for each FMU will need to be tailored to suit the circumstances in that specific FMU.

10. Freshwater accounting

Accurate information on the quantity of water being taken from freshwater bodies, and the type and amount of contaminants going into freshwater bodies, is essential for a number of reasons including the following:

- To inform decisions on freshwater objectives and limits by providing an understanding of the existing use of water, and sources and amount of contaminants, when testing the economic and social impacts of various scenarios for freshwater objectives and limits
- To inform decisions on how to manage within limits (for example, to determine the most equitable and cost-effective way to reduce current discharges)
- To provide feedback to communities on their progress in meeting freshwater objectives, and act as a trigger for changes in management (for example, when existing initiatives are not having the required effect and targets are not being met)
- To provide consistent regional accounting information for investors on catchments where there is headroom for expansion[8].

The NPSFM requires that regional councils establish and operate freshwater quality and quantity accounting systems, and that they collect and record freshwater accounting information for all FMUs (Policy CC1). However, there is no single correct or preferred way to establish a freshwater accounting system to meet the requirements of the NPS-FM. The guidance notes that this can be done at a level of detail that reflects the scale of the water quality/quantity issues in the FMU. This provides scope for information to be gathered in a number of ways including direct measurements, modelling results or estimates. It is also the purpose of the NPSFM, through collaboration, to allow Poutini Ngai Tahu and communities a greater say in what values are important. This will subsequently influence what is measured and accounted for.

Given the different issues facing each of our proposed FMUs and the differing scale of issue facing each of those FMUs, the Implementation Team expect that the accounting systems required for each of our FMUs will not be the same across the board. We will not need the same level of detail or robustness of information in our lower priority FMUs as in our higher priority FMUs.

[8] Ministry for the Environment. 2015. A Guide to Freshwater Accounting under the National Policy Statement for Freshwater Management 2014. Wellington: Ministry for the Environment.

The Council's State of Environment and contact recreation monitoring programmes are a form of freshwater accounting. It is likely that in some FMUs, particularly the lower priority FMUs, that the Council's existing monitoring programme, along with estimates, will be sufficient for the purposes of informing FMU decision making. However, in the FMUs with greater issues, additional monitoring, more detailed information, and catchment modelling, are likely to be required to understand and inform discussions with communities and decision making.

The nature of accounting required for each FMU will only be known when discussions with communities begin and the ways in which communities value their waterways are understood. However, it is important to note that accounting is part of the process, and resourcing will be required to deliver it.

11. Progressive Implementation Programme

In order to meet the requirements of the NPSFM, the Council is required to implement the NPSFM by no later than December 2025. WCRC has extended this timeframe to 2030 which is allowed under the NPSFM. Council considers that meeting the 2025 date would result in lower quality planning; or it would be impracticable for it to complete implementation of a policy by that date.

The NPSFM states that the Council can implement the NPSFM in a programme of defined time-limited stages (Policy E1(c)). This programme was formally adopted by the Council by 31 December 2018, and publicly notified (Policy E1(f)).

A summary of the Progressive Implementation Programme is included below.

Progressive Implementation Programme (Summary)

	Regional Planning	FMU specific planning	Monitoring/Accounting
Phase 1			
2018	• Council agrees approach and notifies PIP • Begin review of Regional Land and Water Plan. Scope includes: • Developing region-wide water quality objectives and limits.	• Establish engagement group for Grey FMU • Develop objectives and set limits for Grey FMU • Establish engagement group for Kawatiri FMU	• Establish monitoring plan and basis of accounting system • Monitor in accordance with plan • Refine accounting system for Grey FMU • Report on progress (as per NPSFM Policy E1(e))
Phase 2			
2020	• Developing region-wide water quantity objectives and limits (minimum flows and allocation). • Identification and management of outstanding water bodies. • Provision for catchment-specific measures	• Develop objectives and set limits for Kawatiri FMU • Establish engagement groups for Hokitika	• Monitor in accordance with plan • Refine accounting system for Kawatiri FMU • Report on progress (as per NPSFM Policy E1(e))
2021		• Develop objectives and set limits for Hokitika FMU • If engagement groups are required, establish groups for South Westland • Develop objectives and set limits for South Westland.	• Monitor in accordance with plan • Refine accounting systems for Hokitika FMU • Report on progress (as per NPSFM Policy E1(e))
2022	Complete first draft of Regional Land and Water Plan and release for stakeholder feedback.	Regulatory elements of FMUs incorporated into draft Regional Plan	• Monitor in accordance with plan • Refine accounting systems for South Westland. • Report on progress (as per NPSFM Policy E1(e))
2023	Draft changes to Regional Land and Water Plan revised and notified.		
Phase 3			
2025	Continue with First Schedule Proposed Plan process	Assess the need for/establish further engagement groups.	
2028	Complete Proposed Plan process, incl addressing: • Any further amendments to the NPSFM. • Further catchment-specific regulatory measures.	• Include regulatory elements of any further engagement groups. • Refine/adjust objectives and limits (if needed).	
2030	Implementation complete		

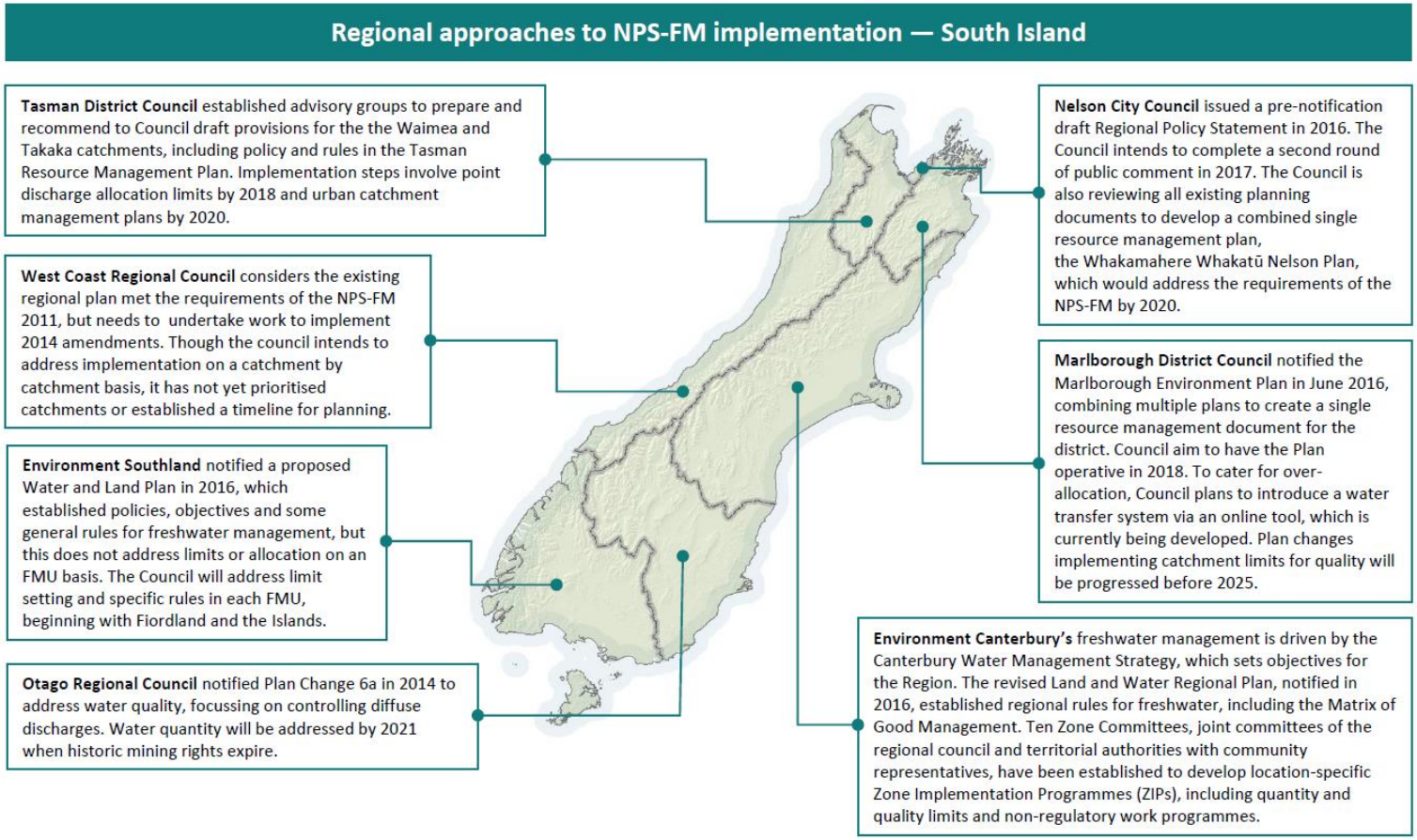
12. Conclusion

Councils are required by the RMA to give effect to the NPSFM. Regional councils around the country are working on implementation of the NPSFM, many investing significant amounts of time and energy into addressing the NPSFM's requirements. Many have made significant progress and it is considered that nationally we are moving from a scoping to implementation phase. This has the effect of raising the bar, and increasing public expectations for the management of freshwater.

The RMA also requires all regional planning documents to be reviewed every ten years. The Regional Council will not be able to carry out a successful review of the operative Land and Water Plan without more work being carried out to address the requirements of the NPSFM. The NPSFM has a number of deadlines associated with expected levels of progress. Given the amount of work required to implement the NPSFM within stipulated timeframes, including the need to work with Poutini Ngai Tahu and engage with communities, the need to start work in this area is becoming urgent as it will be a lengthy process.

Based on our existing monitoring programme we understand the majority of our rivers to be healthy, with a smaller number that require improvement. It is important to note that the NPSFM does not allow any FMU to deteriorate from its current state, regardless of its current state and community ambitions. Therefore the relatively high quality of our freshwater does not obviate us from our responsibility to implement the NPSFM; but it does mean we have fewer waterbodies that are below national bottom lines and must be improved to meet the minimum standard. We can make sure that our commitment to this process is commensurate with the issues we are facing locally.

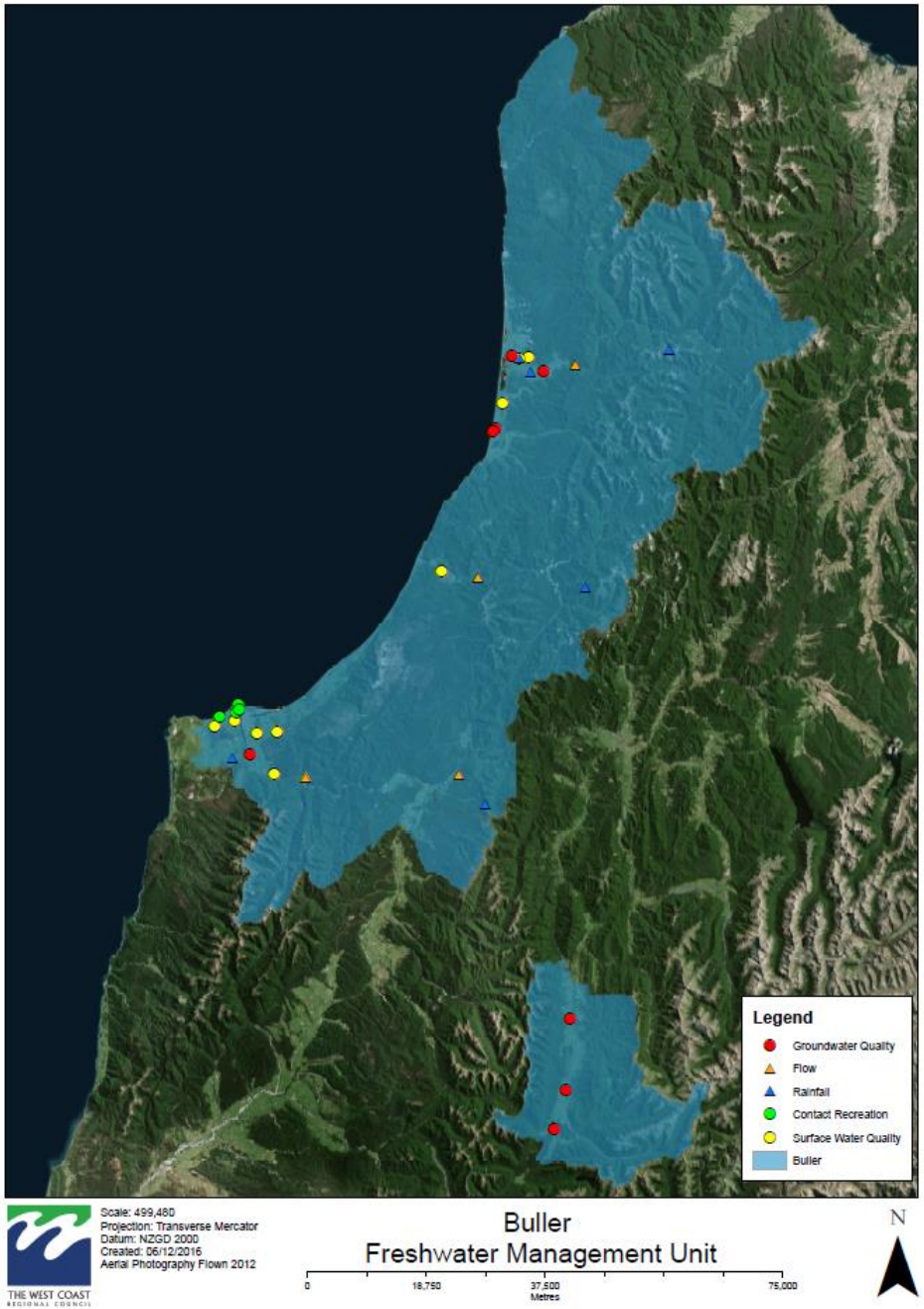
Appendix 1: Summary of regional approaches to NPSFM implementation[9]



[9] Ministry for the Environment, 2017, 'National Policy Statement for Freshwater Management Implementation Review National Themes Report'

Appendix 2: Detailed information relating to each Freshwater Management Unit (FMU)

Note: The Buller, Inangahua and Paparoa FMU's are amalgamated (May 2019).



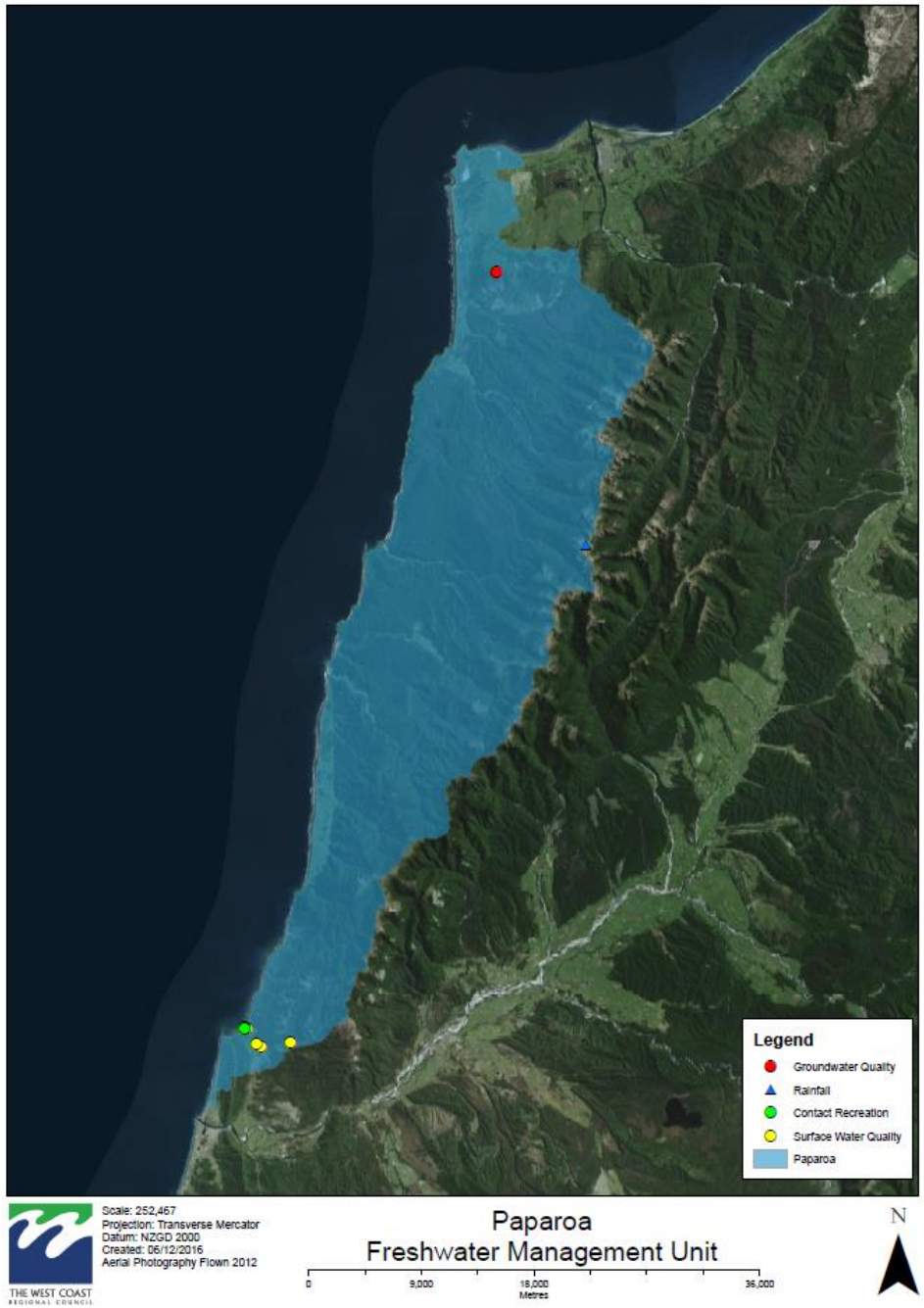
Buller Freshwater Management Unit

(Amalgamated with Paparoa and Inangahua FMUs to become Kawatiri FMU)

This FMU is in the most northern part of the Region and is characterised by its high landscape value and its comparatively untouched and unmodified natural environment. Following South Westland, it is probably the second most popular place within the region for environmental tourism. It is also expected to be an area where tourism and other recreational activities grow in future. Much of the tourism is based upon water pursuits including rafting, kayaking, jet boating, and fishing and is built on the "clean green" image. However, farming and mining also form part of the current land uses and it is understood that some of these are having a negative impact on water quality (both perception and reality – Bakers Creek, Karamea for example. This FMU crosses a jurisdictional boundary we share with Tasman RC and is also subject to the Buller River Water Conservation Order.

Information we have: We have a range of data in this FMU including water quality, rainfall, flow and contact recreation. However, given the size of the FMU, this may not be sufficient.

Information we might need: There are largish gaps in the monitoring programmes, but this may not be an issue dependant on what information is required.



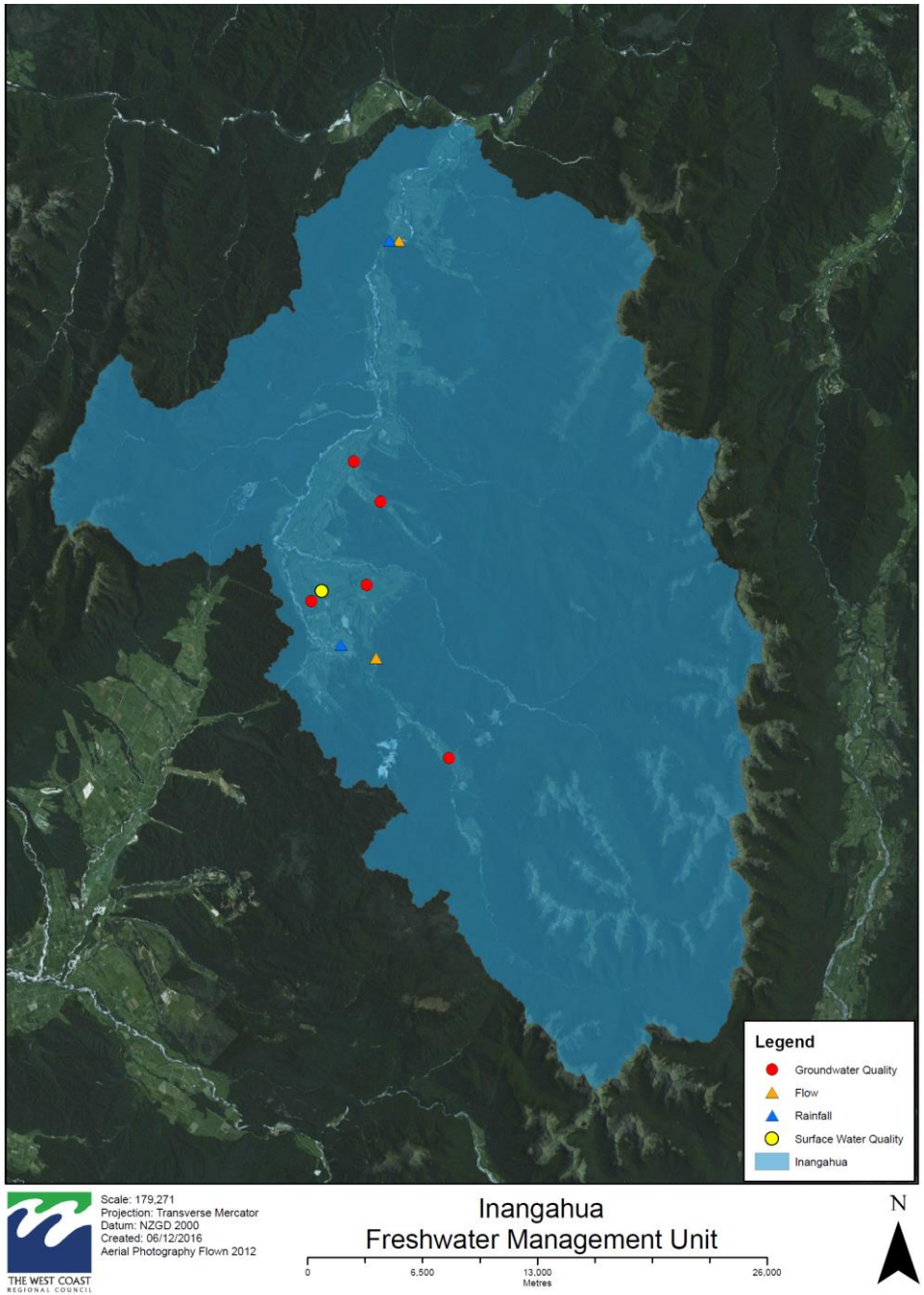
Paparoa Freshwater Management Unit

(Amalgamated with Buller and Inangahua FMUs to become Kawatiri FMU)

The Paparoa FMU is located on the western edge of the Region. It is separated from the Grey FMU due to its unique climatic and geological conditions and because it forms part of a separate catchment that does not experience the same water allocation issues that are mentioned in the Grey FMU. It has a reputation as a pristine environment and this reputation is important for tourism, in particular the rafting and kayaking businesses that are located within this FMU because of these values. A number of mines exist in the FMU which result in water quality issues in a few localised creeks. There exist two very obvious conflicts in values - mining and dairy vs natural character and tourism.

Information we have: Comparatively limited. No current flow data. Four SoE SWQ monitoring sites in the Seven Mile Creek catchment. There is some compliance data associated with mining consents.

Information we might need: Lack of general data across this FMU due to the low level of activity in this area. As such, there is likely to be a need for additional data in this FMU.



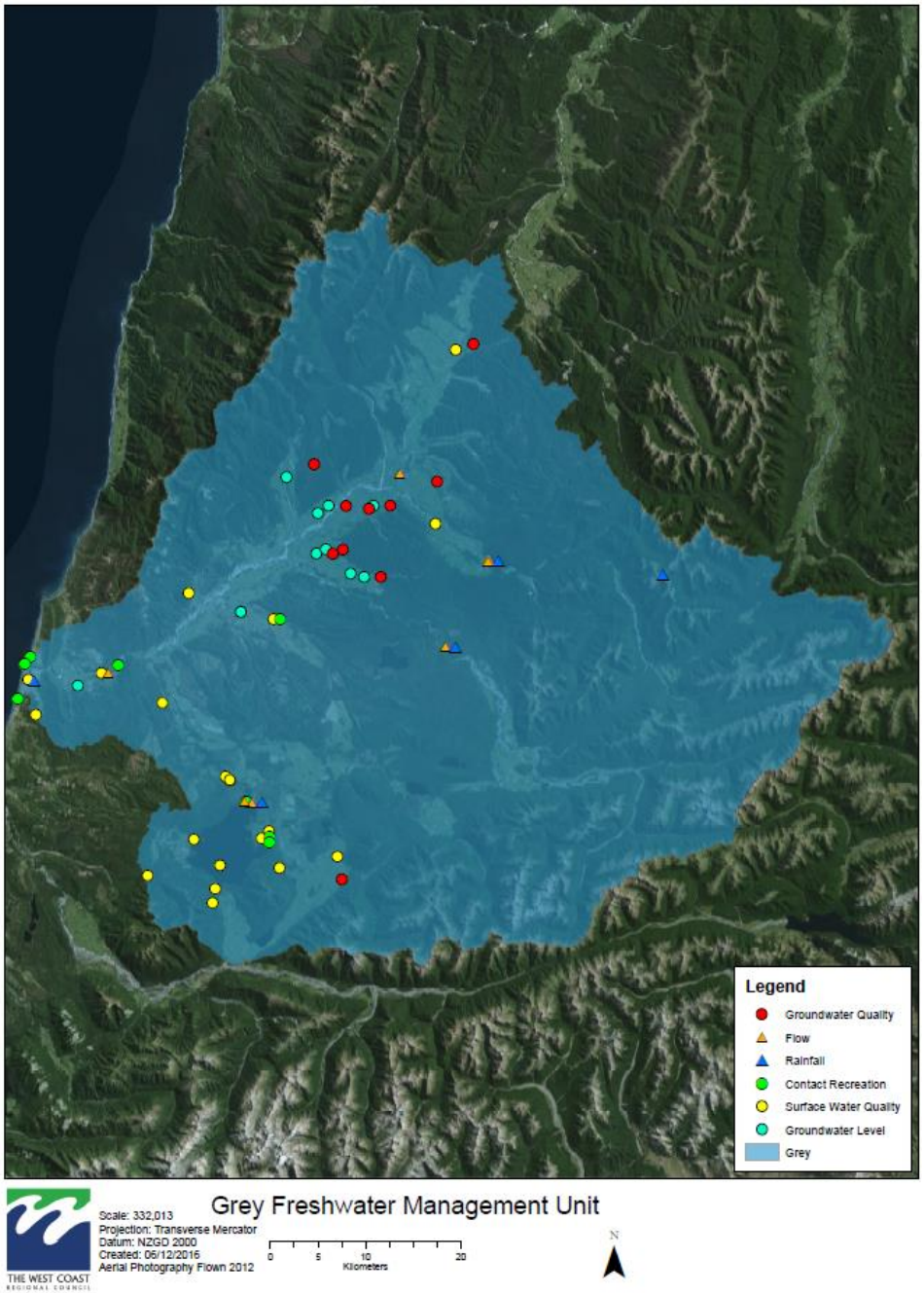
Inangahua Freshwater Management Unit

(Amalgamated with Buller and Paparoa FMUs to become Kawatiri FMU)

The Inangahua FMU is known for its wealth of minerals (coal and gold), but it also contains a number of dairy farms. Like the Upper Grey Valley, the Inangahua catchment is also understood to experience a degree of seasonal demand for water. The area also has water quality issues associated with historical and current mines and the particular geology of the area. The FMU contains the urban settlement of Reefton which gives rise to some urban water quality issues (including impacts associated with the rubbish tip).

Information we have: Currently limited, but planned expansion of both flow and rainfall monitoring in this FMU. There is some compliance data in this FMU that might be useful.

Information we might need: There are gaps in the SoE water quality monitoring programme that may need to be addressed and there is infrastructure in some locations that could facilitate this.

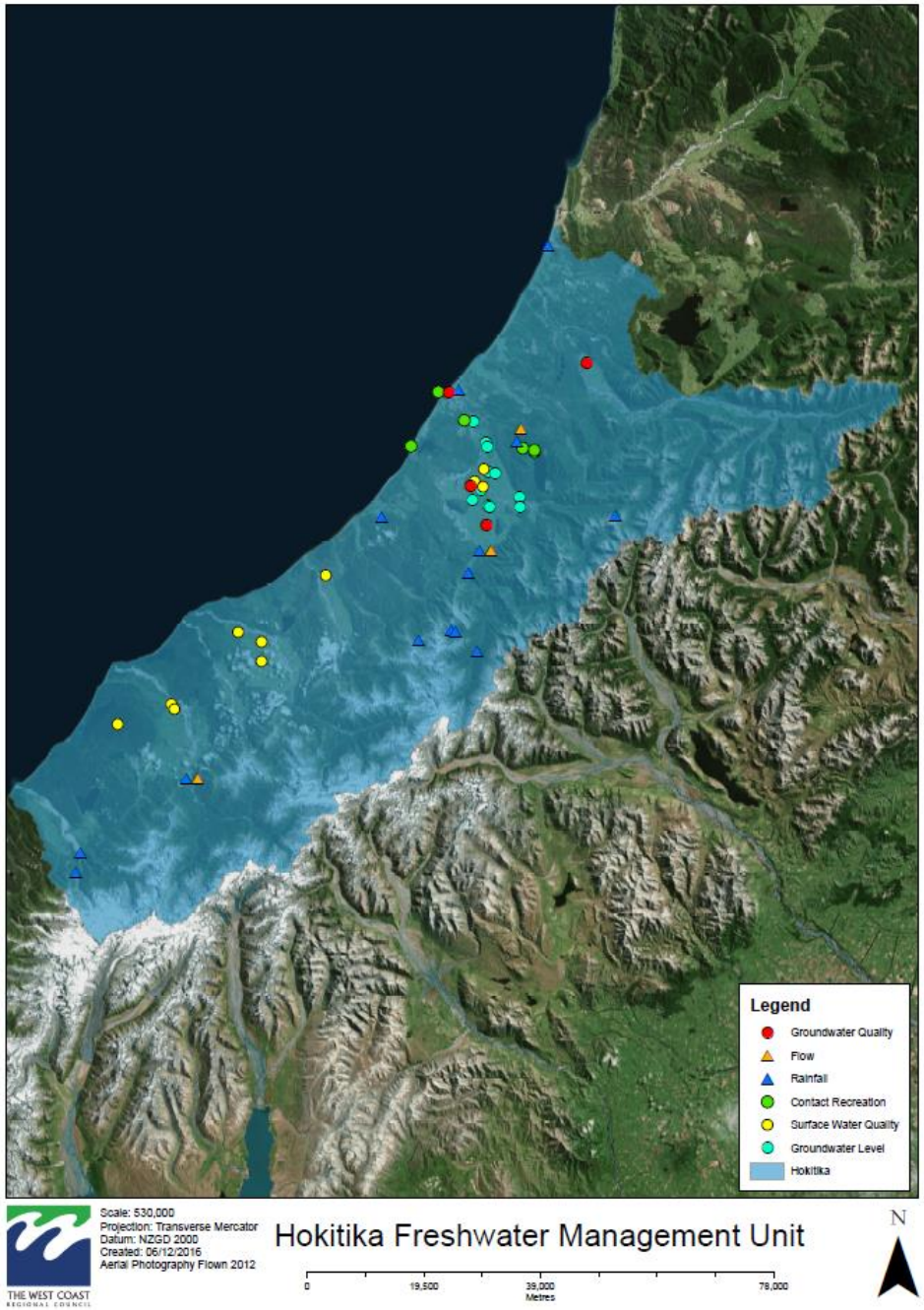


Grey Freshwater Management Unit

Of the six FMUs, the Grey FMU experiences the most intensive activity and is likely to be an area where efforts may need to be focused in future. Not only does it contain the main regional centre of Greymouth and therefore experiences urban water quality issues, it also supports a large amount of farming and the Upper Grey Valley has, in the past, experienced seasonal pressures associated with irrigation. This FMU also includes the Lake Brunner catchment, where considerable effort has been invested in the past (both regulatory and non-regulatory) to reverse a trend in declining in water quality.

Information we have: Most of our monitoring is carried out in this FMU given the population density and intensity of land use. We also have good information within the Lake Brunner catchment and CHESS modelling.

Information we might need: None identified at this stage

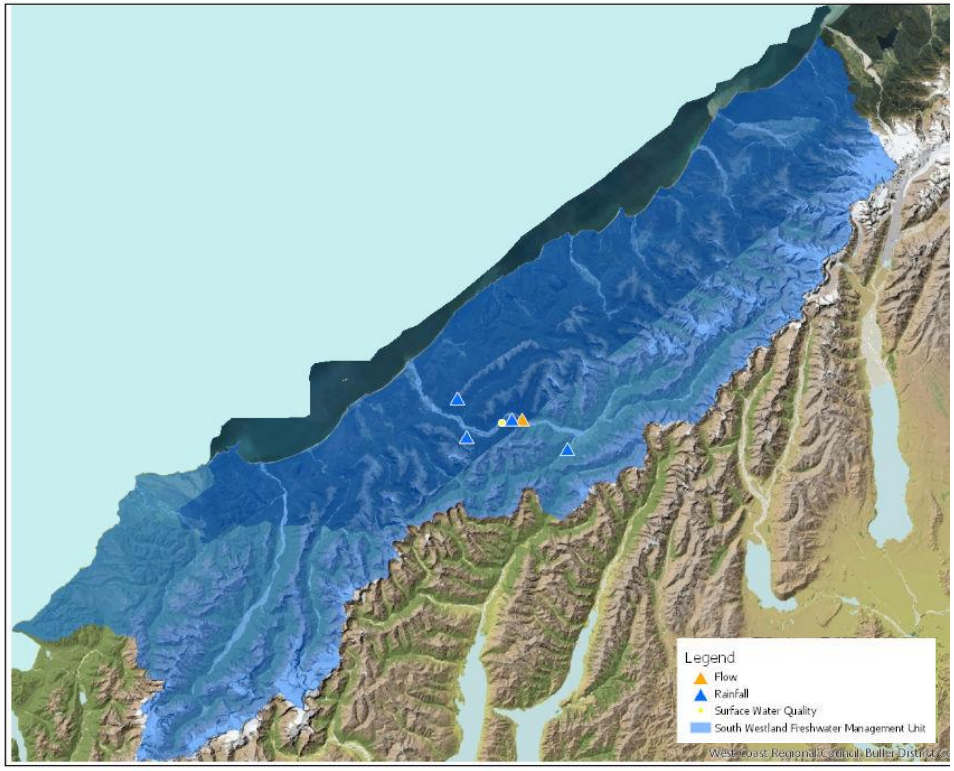


Hokitika Freshwater Management Unit

The Hokitika FMU comprises short catchments with high levels of rainfall. Comparatively, the Hokitika FMU contains a high proportion of dairy farms, some of which are used intensively. The Westland Milk Products processing plant is located in the town of Hokitika and is the major employer in the area with over 250 staff. It is a cooperative and processes the milk from the more than 350 dairy farms throughout the Region. Toward the southern end of the FMU is the Waitangiroto Nature Reserve which hosts the white heron sanctuary. The southern limit of the FMU is south of the Franz Josef township. The FMU experiences some urban water quality issues around the settlements of Hokitika and Franz Josef, including sewage and surface water runoff. There are known to be a number of small hydro schemes located within this FMU and this FMU also includes the catchment of the Arahura River which was traditionally an important source of pounamu, and remains of immense cultural significance for Ngāti Waewae.

Information we have: Similarly to the Grey FMU, there is a relatively good level of data in this FMU given the higher level of activity. There is also a planned expansion of both the flow and rainfall monitoring programme in this FMU.

Information we might need: None identified at this stage



South Westland Freshwater Management Unit

South Westland is the most southern part of our Region and the area with the least development. However, it is also the most widely recognisable part of the Region and its natural features and landscapes are the most frequently visited by tourists. South Westland is the primary environmental tourism destination in the Region, playing host to Fox Glacier and the Westland Tai Poutini National Park. It has the highest percentage of Crown ownership and includes the Te Wāhipounamu South West New Zealand World Heritage Area. This FMU is largely unmodified and lacking in data.

Information we have: There is limited data in this FMU due to the low levels of activity. Historically, NIWA monitored rainfall and flow data (and we retain this information), but much of this monitoring has been discontinued.

Information we might need: Given the lack of general data across this FMU, there is likely to be a need for additional data in this FMU.