



Submission

31 March 2024

TO THE

Northland Regional Council

ON THE

Draft Northland Freshwater Plan Change

BY

Beef + Lamb New Zealand Limited

SUBMISSION ON THE NORTHLAND REGIONAL FRESHWATER DRAFT PLAN

To the: Northland Regional Council (NRC)

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Date: 31 March 2024

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1. Introduction

- 1.1. Beef and Lamb New Zealand (B+LNZ) thank you for the opportunity to provide feedback on the Northland Regional Councils Draft Freshwater Plan Change. B+LNZ is an industry-good body funded under the Commodity Levies Act through a levy paid by producers on all cattle and sheep slaughtered in New Zealand. It is the organisation mandated by sheep and beef cattle farmers to speak on their behalf.
- 1.2. The sheep and beef industry is diverse, adaptable and very resilient. We have continually made eco-efficiency gains in how red meat is produced. Collectively sheep and beef farmers have maintained meat production, while decreasing the total number of animals farmed and their environmental footprint. Sheep and beef farmers are proud kaitiaki of the land and, while recognising more can still be done, are proud of their sector's sustainability and environmental integrity.
- 1.3. B+LNZ's vision is 'Thriving sheep and beef farmers, now and into the future'. An important part of B+LNZ's role is investing in building capability and capacity to support a vibrant, resilient, and profitable sector that contributes to thriving communities. Protecting and enhancing New Zealand's natural capital and economic opportunities through a holistic approach to environmental management is fundamental to the sustainability of the sector and to New Zealand's wellbeing for current and future generations.
- 1.4. We believe that policy and implementation pathways should enable and empower individuals and communities to build resilience across all their wellbeing's. Policy approaches and pathways need to provide for clear, practical, and time-bound outcomes that provide business and community certainty. They must also be considerate of the pressures their intended audience is facing and what additional change, or the threat of change, could mean. Farmers are currently seeing forecasted farm profits to be down 67 percent from 2021-22 year to profit levels not seen since the 80s, except for during the Global Financial Crisis. Policies and rules that impose costs to farmers must be cognisant of the financial uncertainties that farmers face each year.
- 1.5. Regulatory requirements must also be commensurate with the impact of the particular activity, farming system, or land use that the provisions apply to, and rules and standards need to be effects-based, and be equitable across land uses and farming systems.
- 1.6. Within the Northland Region, there are approximately 600 sheep and beef farms classified as commercial (>750 stock units). Many of these farms are class 4 but also cover classes 3 and 5¹. It is important to note the variation of farming within the Northland region and that all farms cannot be treated in the same manner with blanket provisions.
- 1.7. Sheep and beef farms play an important role in the Northland regions economy and communities. The red meat sector employs a significant number of people and supports jobs

¹ **Class 3 North Island Hard hill country:** Steep hill country or low fertility soils with most farms carrying 6 to 10 stock units per hectare. While some stock are finished a significant proportion are sold in store condition.

Class 4 North Island Hill country: Easier hill country or higher fertility soils than Class 3. Mostly carrying between 7 and 13 stock units per hectare. A high proportion of sale stock sold is in forward store or prime condition.

Class 5 North Island finishing: Easy contour farmland with the potential for high production. Mostly carrying between 8 and 15 stock units per hectare. A high proportion of stock is sent to slaughter and replacements are often bought in.

and businesses within rural towns for example, public services including teachers and doctors, small businesses including mechanics and veterinarian clinics, and many contracting businesses including shearers and contract harvesters. Additionally, rural communities play a fundamental role in preserving and looking after our natural environment. B+LNZ advocates for the importance of the red meat sector and rural communities to be considered in the development of regional plans, and the Council considers the following themes:

- Recognition of agriculture and the importance of food security.
- Building climate resilience.
- Allowing for innovation and technology.
- The importance of rural communities.
- Community collaboration to improve and implement sustainable land uses.

- 1.8. The feedback provided in this submission has been developed with input from farmers from within the region, but not as part of a wide consultation process. It is essential that there is adequate consultation with the farming community by Northland Regional Council throughout the process.

2. Essential Freshwater Plan Change

Government review of the NPS-FM 2020:

- 2.1. B+LNZ notes the significant uncertainty on the next steps within freshwater policy. The Government has signalled changes to the National Policy Statement for Freshwater Management 2020 (NPS-FM 2020), the Stock Exclusion Regulations 2020, and Freshwater Farm Plans (FW-FP), but we don't know what they will be. This makes it difficult to provide feedback as we are not sure how it will align with national direction – including the Te Mana o Te Wai hierarchy, which is a fundamental planning concept.
- 2.2. We support the Council's decision to delay its processes till after the review of the NPS-FM 2020 as per the email sent from NRC on the 21 February 2024, as the potential for misalignment between national and regional policy objectives is a significant concern to B+LNZ.
- 2.3. B+LNZ would like to highlight the regulatory fatigue farmers are currently facing due to a number of different rules and plans being enforced over the past decade. We note that the last Northland Regional Plan was notified in 2017 and is still going through processes to become fully operative. It is important that the council is cognisant of this and sets realistic timeframes that allow for community involvement and make selected changes to the Northland Regional Plan to avoid uncertainty and continued confusion for farmers.

Adequate Community Engagement:

- 2.4. Meaningful engagement with the community is essential and required under the NPS-FM 2020 in the development and setting of new regional plans and policy statements. B+LNZ does not feel that NRC has adequately engaged with farming communities leading up to the publication of this draft plan, with a lack of engagement around the settings of visions, values, and environmental outcomes and options.

- 2.5. We understand that farmers are not the only sector within the community, but we need to be compassionate of the impact that future changes could and will have on them. Additionally, to successfully achieve environmental outcomes, farmers will need to be involved in setting practical and workable policies.
- 2.6. B+LNZ was involved in the Primary Sector Liaison Group (PSLG) speaking for farmers, we note that NRC also had the Tāngata Whenua Water Advisory Group (TWWAG) representing tāngata whenua. The PSLG and TWWAG are a subset of the community and do not necessarily reflect the visions, values and opinions of the community itself. These groups must not be seen as engaging with the community or in place of adequate engagement with farmers who live and farm within Northland. Further to this, B+LNZ are disappointed the feedback given in the PSLG report has not been given effect to.

Te Mana o te Wai:

- 2.7. Section 1.3 of the NPS-FM outlines the fundamental concept of Te Mana o te Wai. Highlighting the importance of water and the balance between water, the wider environment, and the community. B+LNZ notes that the NRC uses the term Te Mana o te Mauri o te Wai rather than Te Mana o te Wai whereby the emphasis is placed on the mauri of the wai being the critical element of the concept.
- 2.8. B+LNZ advocates that NRC uses terminology and concepts that are consistent with National Policy Statements for Freshwaters (2017, 2020, and future amendments). At current there is public confusion around what Te Mana o te Wai means in a practical sense, a lack of consistency around the implementation of the concept at a regional level, and an intention by the new Government to rebalance. Introducing new concepts and terminology only adds to the uncertainty in this space.
- 2.9. B+LNZ is concerned that changing the concept changes the balance of Te Mana o Te Wai to add greater emphasis on the priority of the health and well-being of water bodies and freshwater ecosystems. We support the need to prioritise the health of freshwater ecosystems however, in balance with and not at the expense of human, economic, social, and cultural health.
- 2.10. B+LNZs position on Te Mana o te Wai under the existing NPS-FW 2020 is that although the hierarchy is clear the health of the water comes first, it does not preclude the necessity for Councils to provide for (in an integrated way) the other two priorities within a Regional Policy Statement and Regional Plan – it must be acknowledged that priority 2 and 3 are still priorities.
- 2.11. The second priority of the health needs of people is not limited to drinking water. Drinking water is an example given in the NPS-FM but it must be recognised that water is crucial to human health beyond drinking water, including for food production and sanitation. Further to priority two, it does not refer to the direct consumption of food and water from a direct water source and therefore we must not instate that every water source should be able to be directly used.
- 2.12. Finally, the third priority the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future may be priority three but that does not assume that it is not a priority and should not be clearly considered and given effect to throughout the plan.

Long-term visions for freshwater:

Northland Regional Plan Long term vision for freshwater:

The wairua and whakapapa of Te Hurihanga Wai, is prioritised, respected, protected and enhanced.

We will know if we are on track to achieve the vision if by 2040:

- (a) Tāngata whenua values and mātauranga Māori are identified and are embedded in freshwater management; and
- (b) Tāngata whenua are actively leading freshwater decision making, monitoring, policy and plan changes, and resource consent processes; and
- (c) The mauri and health of freshwater is significantly enhanced; and
- (d) The habitat health of freshwater and coastal receiving environments is improving; and
- (e) The range, diversity and numbers of freshwater native species is improving; and
- (f) Freshwater is safe for people to interact with (such as practicing mahinga kai or swimming) at most sites; and
- (g) Freshwater ecosystems are more resilient to the impacts of climate change; and
- (h) Sources of drinking water supplies are clean and reliable, and resilient to the impacts of climate change; and
- (i) Freshwater is used sustainably to support resilient and thriving communities, and sustainable livelihoods.

- 2.13. A long-term vision plays an important role in setting the tone of a regional plan, motivating change, and leading the community forward. We are concerned that the above vision is overly simplistic and should not be defined in one short sentence. It does not convey an aspirational future that will motivate positive change for the community. The vision is not measurable and will be difficult to define whether it has been achieved or not.
- 2.14. With NRC stating they will delay notifying the plan until after the NPS-FM 2020 reform we encourage the council to use this as an opportunity to adequately engage with the community to establish an understanding of what is important to those that live and work within the region to set a realistic, reasonable, and well-informed vision that motivates change.
- 2.15. We support the themes discussed in the targets listed in (a) – (i) but advocate that these themes should be prioritised in the core vision to recognise and reflect the importance of prioritising not just freshwater health but also the health of communities and the economy.
- 2.16. The PSLG report provided feedback on potential wording and themes to include in a vision. We are concerned that the feedback provided has not been given effect to and highlight the failure to recognise the following statements that were made:
- *“Social, cultural and economic well-being of present and future generations.*
 - *Communities resilient to climate change.*
 - *Food and fibre production is supported by innovative and sustainable land and water management practices that continue to: maintain food security, support a transition to lowering emissions, improve resilience to the effects of climate change, recognise and provide for primary production.²”*

² Primary Sector Liaison Group (PSLG) Report to NRC – October 2022, pg 5.

- 2.17. B+LNZ has concerns that there is no over-arching timeframe and only an interim timeframe of 2040 to track the achievement of targets. B+LNZ supports the use of interim timeframes to guide the region forward. However, the NPS-FM 2020 sets out the requirements for regional councils to set a timeframe for a vision to be achieved, this is to be both ambitious and reasonable. The example given in the NPS-FM is 30 years. B+LNZ does not see this as realistic and argue that timeframes need to allow for time for plan changes to be implemented, time for communities to react and make changes, and time to see changes in freshwater attributes.
- 2.18. B+LNZ cannot support timeframes that are shorter than 30 years, such as 2040. Only providing the one timeframe of 2040 creates uncertainty of whether these targets must be achieved in full by 2040 and what is to be achieved post this date to continue to achieve the vision.
- 2.19. B+LNZ supports the comments made in the PSLG:

“When setting a timeframe, it’s important to recognise:

- *the lag time between changes made now and water quality improvements can be upwards of 50 years, depending on the natural makeup of the landscape,*
- *the journey it will take to improve the health of our waterways, including its associated cost (refer to KMR example earlier and the resources available),*
- *mitigations to enact freshwater improvements are heavily reliant on individual buy-in, often requiring a level of behaviour change that will not occur immediately.*

To evoke a relationship between the present and future, recognising the importance of sustainable land and water use, the PSLG suggests using the word ‘generation’ (rather than years); for example, ‘two generations’. Generational thinking connects one to a distinctive timeline, evoking a personal connection to time through both family and the land.

Timeframes should be influenced by community aspirations, taking into account the social, economic and cultural implications, while allowing for a reasonable transition time depending on the desire for future water quality states.³”

3. Consultation documents

Stock exclusion – water ways and riparian buffer zones

- 3.1. B+LNZ understands the benefits of stock exclusion and riparian management of rivers, lakes, and wetlands. However, we have concerns surrounding the regulatory framework and regional blanket provisions as suggested by NRC.
- 3.2. B+LNZ is concerned that the NRC does not adequately balance environmental risk with resulting cost. Expanding stock exclusions requirements beyond what is stated in national legislation will significantly impact farm systems and businesses and is likely to result in other mitigation options being forgone for example wetland creation, sediment traps, and stock water reticulation systems, some of which could bring greater environmental gains whilst allowing for the farm to maintain profits and farming systems.

³ Primary Sector Liaison Group (PSLG) Report to NRC – October 2022, pg 5.

- 3.3. Blanket provisions that impose stock exclusion need to fully understand the costs involved not just for fencing but also for changes in farm systems, repairs and maintenance of fences, and other infrastructure costs. This includes but is not limited to stock drinking reticulation systems and stock crossings (bridges and underpasses). Any rules surrounding the construction and installation of structures including bridges, culverts, and underpasses must allow for an easy pathway for farmers to build infrastructure to meet stock exclusion rules.
- 3.4. Additionally, we need to be clear on the definition of stock exclusion and whether this is through permanent or temporary fences, or alternative methods such as plantings and virtual fencing such as Halter. Stock exclusion requirements should be flexible for farmers to adapt and innovate to meet the multiple demands of their business and be implemented via farm management practices that manage the risk. This can be done using a Freshwater Farm Plan (FW-FP), or Farm Environment Plan (FEP).
- 3.5. B+LNZ is also concerned about the blanket provisions to enforce riparian planting. This imposes an additional cost on farmers and will further put farms under risk of being financially unviable. It is not realistic or achievable to enforce all rivers and streams to be riparian planted. A blanket provision does not take account of necessary factors such as soil type, slope of surrounding land, flood risk, and the farm business. There is also a concern that a planted margin, if not adequately maintained, can result in weed and pest issues.

Consultation Questions:

How far away from waterways should stock be kept? Should an averaging approach be used for 5metres + stock exclusion?

- 3.6. To be clear B+LNZ does not support blanket provisions to enforce region-wide stock exclusion. However, if a distance is to be set B+LNZ advocates the council aligns with the national regulations of 3 metres to maintain consistency. Those that have begun fencing under the national regulations should not be penalized for the work they have done so far by requiring to shift fencing from 3 metres to a wider exclusion distance as this would result in a waste of resources (finances, labour time, and environmental waste through lost infrastructure – fence posts and wire).
- 3.7. Applying a set exclusion distance of 3, 5, 10 or 30 metres as a blanket provision across the region does not consider the complex nature of hill and high-country farming operations. There are many factors and variables that create and contribute to environmental risk, including slope, vegetation, soil type, stock type, and stocking rate. Determining the appropriate size for a buffer area on a farm is unlikely to be successful as a “universal” one size fits all approach.
- 3.8. An averaging approach must be implemented. It is not realistic or reasonable to not allow for an averaging approach. An averaging approach will allow for better environmental outcomes whereby farmers can prioritise areas of a river or stream that will bring better environmental gain if fenced. It will also mitigate some of the issues with the impracticalities of fencing some landscapes due to topography and flood risk.

Should stock exclusion be extended to apply to other animals?

- 3.9. B+LNZ does not support sheep being included in stock exclusion rules. Unlike other stock, sheep do not have a natural tendency to stand in or disturb stream margins or beds, their feet are much lighter and therefore pose a reduced risk to stream bank erosion and they get much of their water needs through grazing pastures. Therefore, the additional cost of a multiwire fence is a costly exercise to bring little environmental gains. Considering the animal behaviour of sheep and the increased cost of exclusion, exclusion of sheep is neither effective nor efficient. This also highlights the importance that regional plans give appropriate water allocation to farmers to allow for water security for stock within reticulation systems to avoid stock searching for freshwater sources in dry periods.

What should the rules be for excluding stock from wetlands?

- 3.10. Fencing of wetlands can be problematic and difficult. Unlike rivers, wetlands are not confined to channels and can be located in the middle of paddocks and scattered throughout farm landscapes whereby fencing can impact the farms farmable area and be both difficult and expensive.
- 3.11. It is important that wetlands for the purposes of stock exclusion are well defined and exclude human constructed wetlands, critical source areas, and wet pastures. Mapping of natural wetlands has proven across the country to be a complex process with many inaccuracies. Any provisions to regulate exclusion from wetlands needs to allow farmers to have input into adequately defining natural wetlands on their properties, and a mechanism to dispute incorrectly identified wetlands.
- 3.12. Stock exclusion from wetlands would be best completed under an FW-FP or FEP whereby farmers can identify areas of the farm that would bring the greatest results to wetland and freshwater ecosystem health.
- 3.13. Rules that mandate the exclusion of stock from wetlands must not discourage farmers from constructing wetlands or penalize those that have worked to retain and maintain wetlands over those that have removed and therefore escaped costs of wetland management. Grazing in wetland areas can also act as an important management tool in preserving the health of a wetland as seen in the Upper Taieri Scroll Plains in Otago.

What timeframes are feasible for any new stock exclusion rules?

- 3.14. Farmers should have the ability to set timeframes within a FW-FP or FEP whereby they can budget and plan based on the circumstances of their farms. All farmers will require a different amount of resources based on the quantity of waterbodies on their farms, how much fencing has already commenced, and the financial health and budget of their farm business. One farmer we spoke to farms a 50-hectare sheep and beef farm with 3.8km of river flowing through. Fencing this length of river will be a significant cost to his business, alongside remove a large portion of farmable area. Additionally, the river and area is highly susceptible to flooding and therefore infrastructure is likely to be costly to maintain. These stock exclusion rules could significantly impact the viability of their farming system.
- 3.15. When setting timeframes, it is also important to allow for innovation and other mitigation options to become available. For example, Halter virtual fencing is becoming a more

common practice in dairy farming but is still an expensive option for sheep and beef farmers with technology still developing. We cannot impose high costs of fencing on farmers which will inhibit future investment into other mitigation options.

Stock exclusion – highly erodible land:

Should stock exclusion rules apply to highly erodible land?

- 3.16. Excluding stock from highly erodible land is inferring that land should be retired to other uses or not used at all. B+LNZ does not support the blanket retirement of land from sheep and beef farming. B+LNZ supports farmers being able to identify areas of concern on their farm and mitigating concerns through practices that suit them and their farm system.
- 3.17. Excluding stock from slopes may seem like the easiest option to avoid sediment loss however, it is important to understand the characteristics of the soil types, slopes, and farm systems. Some farms may have a combination of soil types that mean that the slopes are relatively stable, and the flatter land is prone to pugging. It may be that having cattle on the flatter land on that farm results in more contaminant losses than if they were on safer sloped land (with the caveat that they were actively managed on the slopes and there is a 'Plan B' for adverse weather events).
- 3.18. In areas of highly erodible land stock exclusion and/or planting regenerative bush or pine plantations are not the only answers to preventing erosion and may not provide the best outcomes for the environment or community. Other techniques for managing erosion can be identified and actioned within a FW-FP or FEP. These can include:
- grazing management including during wet conditions,
 - silvopasture techniques including pole planting,
 - managing animal behaviour and health,
 - trough and fence placement,
 - following best practice techniques for cultivating paddocks.
- 3.19. B+LNZ is also concerned with 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 weeds and pests, and increased fire risk from ungrazed pasture. Farmers should not be required to retire large areas of land while still needing to manage the costs and risks of this retired land, they simply would not be able to afford to do so.
- 3.20. We also advise caution in using maps to determine management of highly erodible land. The map provided by NRC is unable to accurately identify areas of great erosion risk. A map that identifies erosion risk should include soil type, slope, geology, vegetation cover among other things. Additionally, it does not consider the farm practices already in place for example pole planting, stocking rates, and farm management during adverse events. Or where waterbodies are present that need to be managed. Excluding stock from slopes where there are no waterbodies at the bottom of the slope should not apply as there is no direct risk to water.
- 3.21. Retiring steep areas of land can fundamentally change a farm system and lead to implications to the farm system including the intensification of lower sloped areas or result in a farm becoming unviable. Sheep and beef farmers commonly farm through rotational grazing and farm to the grass curve. This involves constantly changing their farm practices, mob rotations, and stock numbers throughout the year to utilize different areas of their farm

to mitigate changing seasons, feed availability, maintain stock health, ensure increased pasture growth, control animal feed intake, and preferentially feed some classes of stock. Excluding stock from certain areas of a farm including hill country can have a significant impact on these farm practices. For example, hill country areas may be important for summer grazing to allow pasture regrowth on flat areas to allow for making additional feed like silage and / or allowing for pasture regrowth for cooler months when pasture growth declines.

Alternative options to stock exclusion:

Farm Environment Plans (FEP)

- 3.22. Stock exclusion is one tool to mitigate contaminants reaching water sources, however, stock exclusion comes with a high financial and labour-intensive cost to farmers. All farms come with differing inherent risks and farm practice risks which therefore means that there should be no 'one-size-fits-all' approach. Farmers should have the ability to identify the key risk(s) on their farm and mitigate through tools that suit their systems, this can be achieved through a FEP.
- 3.23. A FEP is a documented plan that identifies on-farm environmental risks and outlines strategies for managing and mitigating those risks. A FEP addresses soil health, water quality, biodiversity, and nutrient management in a holistic way to promote sustainable farming practices and minimise environmental impact. Without a holistic approach to managing contaminants there is a high risk of causing unintended consequences.
- 3.24. Identifying areas of erosion and contaminant losses within FEPs allows farmers to identify the area more accurately at a smaller scale and create mitigation options that work for the farm system without the burden of retiring large portions land.
- 3.25. It is important that farmers can use their time and financial resources to invest in options that provide for the best outcomes for both the farm and the contaminant loss reduction. This may include sediment traps, space and/or pole planting, investing in water reticulation systems, or changing cultivation practices.

Catchment Groups

- 3.26. The council should encourage community collaboration and catchment groups that can provide pragmatic solutions to environmental issues. Catchment groups are a non-regulatory avenue for farmers, landowners, community members, tāngata whenua, regulators, and other interested stakeholders to work collaboratively together to respond to catchment specific issues. Catchment groups allow those within the area to learn from each other and recognise the contribution, whether negative or positive, that they may be having. Rather than having blanket provisions that penalise all farmers, catchment groups can identify high risk areas and mitigate appropriately. Catchment groups also allow for shared resources and funding.
- 3.27. Despite Section 'E – Catchments' in the Northland Regional Draft Plan there is little mention or encouragement of catchment groups, catchment values, or community collaboration with catchments.

- 3.28. FEPs and catchment groups work well together through a holistic approach at both the farm and catchment scale. These alternative options also coincide well with Council Action Plans within the NPS-FM 2020.

Targeted Water Allocation Policy Consultation Document

Water Allocation Policy:

Where primary allocation is available for abstraction, the Northland Regional Council will allocate 20% of the total wai available in every allocation unit⁷, for use for the following activities:

- a) Contribution to environmental enhancement; or
- b) Wai for domestic use by marae and papakāinga; or
- c) Any other use of wai, provided that:
 - i. it includes contribution to a Te Mana me te Mauri o te Wai fund managed by the Northland Regional Council in consultation with tangata whenua,
 - ii. the fund will be used to provide for development of Māori wellbeing;
 - iii. the contribution to the fund is proportional to the amount of reserved wai being taken and any commercial returns resulting from the application; and,
- d) The development of Māori owned land and land returned to a Post-Settlement Government Entity through a Treaty Settlement.

Advisory note: Māori wellbeing is best defined by tangata whenua groups who may be able to apply to this fund. This can include better social and cultural outcomes for Māori.

- 3.29. B+LNZ supports the need to move away from a model based on first in first serve but have concerns that this policy does not meet the requirements of the RMA as it seeks to move away from a resource consenting process to a regime that could favour one group of people over another. B+LNZ is also concerned that within unallocated water there is no provision allowing for the reasonable allocation and use for stock drinking water as required under the RMA, building climate resilience, and providing for other essential water takes.
- 3.30. NRC needs to ensure it understands how various policies being proposed work together, to avoid unintended consequences. With the changes proposed for stock exclusion there are a number of sheep and beef farmers that may be required to invest in stock reticulation systems which in turn may require more investment in, and consenting of, water storage and allocation. We also note that stock water is most crucial during dry periods and droughts when water shortages may exist. Water quantity policies play an important role in how the region prepares for climate events and builds resilience. B+LNZ would support this policy identifying the need for the region to be climate resilient.
- 3.31. We support that 20 percent of water allocation could provide for local values in a specific waterbody but question how this will be decided and who by? The regional plan should enable the community to be fairly represented and involved in processes relevant to them. Everyone in the community holds different values and opinions on water use, the regional plan should enable the community to be fairly represented and involved in processes and decisions relevant to them. For example, who should decide if water is to be kept in the river to support native fish habitats, should be contributed to water storage, or be used to support marae and papakāinga? These same points relate to the fund highlighted in (c)(iii)

and how the fund would finance projects across the region. The consultation document and council resources online lack details on the implementation of both this policy and the fund.

- 3.32. B+LNZ appreciate that current resource consents will not be affected as to not diminish water security for the primary industries. However, there is a lack of understanding in how expiring consents will be treated and reissued. Will there be an intention to clawback water resources from consent holders and in catchments that are over allocated and is there an aim to have water made available to meet this water allocation policy?
- 3.33. Water allocation policy also needs to be future proofed to enable those that may not currently take water to have a pathway to do so in response to climatic change, or pressure to intensify production as a response to a need or desire to retire parts of a farming operation. Locking in water allocation rights to existing users can come at a detriment efficient and sustainable land use into the future.
- 3.34. We also highlight that the council needs to provide better data and information on water allocation in catchments across Northland so we can provide adequate comments on water quantity issues within the region.

4. Conclusion

- 4.1. B+LNZ thank the Northland Regional Council for providing the opportunity to provide feedback on an early draft of the Northland Regional Freshwater Plan. We appreciate the time given to provide feedback and the acknowledgement from Council that timeframes will be slowed given recent Government announcements and the plan will not be notified until after the review of the NPS-FM is completed. We hope that Council uses this as an opportunity to further engage with the community to understand the wants and needs of the many people that live and work within the region.
- 4.2. The draft plan that has been provided by the Council has some large concerns for sheep and beef farmers, including the stringent provisions around blanket stock exclusion from waterways and highly erodible land. B+LNZ is happy to work further with the Council to ensure any rules that are enforced within the plan are pragmatic, sensible and will not lead to an unviable farming sector within Northland.
- 4.3. NRC must recognise the importance of farming to the region and create enduring policies that enable and empower individuals and communities to build healthy and resilient farming systems. Additionally, policies and rules must align where possible to national regulations to provide for a coherent framework and to avoid added confusion for farmers.