

## Submissions from organisations/groups

### Te Mana o te Wai

Goal	Submitter	Position	Submitter Comment
The FMU is managed in accordance with Te Mana o te Wai objectives and policies	Department of Conservation	Support	
	Federated Farmers – Manawatū-Rangitīkei	Support	Notes that farmers are obliged to ensure the provision of stock water for animal welfare purposes and these principles should not interfere with that
	Federated Farmers - Tararua	Neutral	Do not want the hierarchy of obligations to exempt water suppliers from improving their resilience to climate change
	Fish and Game – Wellington Council	Support	Strongly urge that environmental health and protections (including those protecting the habitats of valued introduced and indigenous species) need to be prioritised over any consumptive use in order to give full effect to the hierarchy of obligations of Te Mana o te Wai <sup>1</sup>
	Horowhenua District Council	Support	
	Horticulture NZ	Neutral	
	Manawatū District Council	Support in part	Concerns about conflict between hierarchy of obligations and obligations under the Health Act [now replaced by the Water Services Act 2021]
	Ngā Kaitiaki O Ngāti Kauwhata Incorporated	Support	
	Whanganui District Council	Support	
	Whanganui Rural Community Board	Support	
The Manawatū River/Lake Horowhenua becomes a source of regional pride and mana	Department of Conservation	Support	
	Federated Farmers – Manawatū-Rangitīkei	Support	Wants this to apply to the Rangitīkei-Turakina FMU
	Federated Farmers - Tararua	Support	
	Horowhenua District Council	Support	
	Manawatū District Council	Support in part	Should not be limited to just the main stem of the Manawatū River, should include all waterways classed as being >6 REC in all FMU
	Ngā Kaitiaki O Ngāti Kauwhata Incorporated	Support	This includes the Oroua River
	Water Protection Society	Support in part	Pride and mana can lead to behaviours which may be negative in terms of meeting the objective of the NPS-FM as well as behaviours which are positive. So we don't support FMUs becoming a source of regional pride and mana without condition. We

<sup>1</sup> Edited on 15/11/2022 following further discussion with Wellington Fish and Game

			do support 'the management and condition of FMUs leading to human emotional states that foster behaviours that protect and/or enhance the health and well-being of the water bodies and systems, the health of people, and the ability of people to provide for their social, economic and cultural wellbeing.'
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## Health and wellbeing of freshwater

Goal	Submitter	Position	Submitter Comment
FMU and estuary returned to healthy condition	Department of Conservation	Support	
	Federated Farmers – Manawatū-Rangitīkei	Support	Feds does not have sufficient information to know whether the FMU is in a degraded state  Does not want achieving this and other goals to come at the cost of the primary sector and considers the need to minimise the impact of flooding in rural communities.
	Federated Farmers - Tararua	Support	
	Fish and Game - Wellington Council	Support?	This includes abundant water flows to support fish  This includes improving the aesthetics of freshwater habitats.
	Horowhenua District Council	Support	
	Horticulture NZ	Neutral	Needs to be more definition as to what is a healthy condition. 'Returned' suggested pristine condition.
	Manawatū District Council	Neutral	Needs to be more definition as to what is a healthy condition.
	Ngā Kaitiaki O Ngāti Kauwhata Incorporated	Support	
	Water Protection Society	Support in part	Needs to be more definition as to what is a healthy condition.
	Whanganui District Council	Support	
	Whanganui Rural Community Board	Support	
Habitat restoration	Department of Conservation	Support	
	Federated Farmers – Manawatū-Rangitīkei	Support	Notes farmers will continue to restore the natural habitats of indigenous species in the region
	Fish and Game – Wellington Council	Support	Fish habitat management should be 'outcome-focused'. Funding should be allocated by Horizons for fish passage remediation. Remediation should be achieved within 10 years.  Should apply to 'rare and threatened species'

	Horowhenua District Council	Support	
	Horticulture NZ	Oppose	Too high level and open ended. Possibly too ambitious.
	Manawatū District Council	Support in part	Concerned that this is not reasonable. Wish to see more detail on implementation timeframe and costs. Seeks funding for implementation.
	Ngā Kaitiaki O Ngāti Kauwhata Incorporated	Support	
	Water Protection Society	Support	
	Whanganui District Council	Support	
	Whanganui Rural Community Board	Support	
Diversity and abundance	Department of Conservation	Support	
	Federated Farmers – Manawatū-Rangitikei	Support	
	Federated Farmers - Tararua	Support	
	Forest and Bird	Support in part	Not ambitious or specific, needs to be strengthened. Suggest restoration to pre-human levels.
	Horowhenua District Council	Support	
	Manawatū District Council	Neutral	Support in principle but suggests this in an environmental outcome or anticipated environmental result. Concerned there is no baseline data.
	Ngā Kaitiaki O Ngāti Kauwhata Incorporated	Support	
	Water Protection Society	Support in part	Needs a target attribute state to determine level of improvement.
Land use practices/management will minimise...	Department of Conservation	Support	
	Federated Farmers – Manawatū-Rangitikei	Support	
	Federated Farmers - Tararua	Neutral	Considers there is insufficient science to guide best practice. Productive lands need to be protected for food. Support non-regulatory programmes. Concerned that plantation forestry could exacerbate soil erosion (harvest)
	Fish and Game - Wellington Council	Support	Non-regulatory programmes are insufficient.
	Forest and Bird	Oppose	Vague and should be reframed in a positive context.
	Horowhenua District Council	Support	

	Horticulture NZ	Support in part?	<p>1<sup>st</sup> goal - REPLACE WITH: 'Land use practices minimise the adverse effects of discharges of nutrients and other contaminants to water bodies, while maintaining domestic food supply and food security and recognising the importance of discharges to receiving environments to supporting the ability of people and communities to provide for their social, economic and cultural wellbeing now and in the future.' It would assist if there was greater clarity about what 'minimise' means and that it needs to reflect what is reasonably practicable (although note that this may come through the broader plan framework).</p> <p>2<sup>nd</sup> goal - suggest that this statement could be reframed to add clarity (e.g. whether extent is also intended to be a reflection of severity of soil erosion), and what can be controlled.</p>
	Manawatū District Council	Support in part	<p>Seeks a viable pathway for land-based discharge or municipal wastewater.</p> <p>Seeks greater emphasis from Horizons on indigenous planting for erosion control over P. radiata.</p>
	Ngā Kaitiaki O Ngāti Kauwhata Incorporated	Support	
	Water Protection Society	Support in part	<p>Minimise is too vague. Seeks no discharges greater than natural state.</p> <p>Department of Conservation should be required to decrease soil erosion from the conservation estate.</p>
	Whanganui District Council	Support	
	Whanganui Rural Community Board	Support	
Water takes and climate change	Department of Conservation	Support	
	Federated Farmers – Manawatū-Rangitikei	Support	
	Federated Farmers - Tararua	Neutral	New home should require their own water storage.
	Forest and Bird	Neutral	Reframe to an outcome focus
	Horowhenua District Council	Support	

	Horticulture NZ	Support in part	REPLACE WITH: 'Healthy and abundant water supports opportunities for sustainable food production and innovative and sustainable land and water management practices and storage improve resilience to the effects of climate change'. Apply to all FMU
	Manawatū District Council	Support in part	Concerned about future impacts on surface water takes for water suppliers. Seeks that essential takes be authorised to continue taking at low flows at a reduced rate.  Seeks that Horizons reconsider the first-come first-served allocation method.
	Ngā Kaitiaki O Ngāti Kauwhata Incorporated	Support	
	Water Protection Society	Support	Water takes need to be set with this in mind, always putting the health and well-being of the waterway ahead of economic and other interests.
Trophic status of Lake Horowhenua	Forest and Bird	Oppose in part	Not ambitious. Specified Vegetable Growing Area should not be exempt from national bottom lines.
	Horowhenua District Council	Support	Suggest these should refer to Lake Horowhenua/Punahau rather than just "Lake Horowhenua"
	Horticulture NZ	Neutral	Need to confirm that it is 'ambitious but reasonable'
Other	Fish and Game - Wellington Council		A goal for wetland restoration and creation is required. Expects Horizons to incentivise this with urgency. Request that Horizons fund an assessment of potential wetland enhancement in the region.
Other	Forest and Bird		A goal for wetland restoration is required, using Forest & Bird's NZ vision, includes doubling the extent of natural wetlands by 2050.
Other	Fish and Game - Wellington Council		River management should consider environmental and social values, including trout and native fish habitat. Request Manawatū FMU be given particular attention.
Other	Forest and Bird		A goal for our river management activities is required that restores river connection to their floodplains.
Other	Forest and Bird		Goals should link to flows and levels rather than takes
Other	Water Protection Society		A goal for wetland restoration and maintenance is required.

## Human health

Goal	Submitter	Position	Submitter Comment
Swimming and recreation	Department of Conservation	Support	Notes that the surface of Lake Horowhenua is Recreation Reserve. The target water quality of the lake must be consistent with recreational use at a minimum
	Federated Farmers – Manawatū-Rangitīkei	Support	
	Federated Farmers - Tararua	Neutral	There are biosecurity and health and safety risks associated with the public having free access to all waterways. Would encourage targeted development of swimming and recreational areas along the river.
	Fish and Game - Wellington Council	Support	The health of dogs should also be provided for
	Horowhenua District Council	Support	
	Manawatū District Council	Support in part	Considers that it is the water quality that should be safe, not necessarily the “waterway”, as they are inherently unsafe environments. It is not clear what is meant by “accessible” in relation to private land. Existing points of access should be maintained.
	Ngā Kaitiaki O Ngāti Kauwhata Incorporated	Support	
	Tararua Plantain Water Sampling Group	Support	
	Water Protection Society	Support in part	Waterways being safe and accessible all of the time is unrealistic. This goal would be better expressed to include that 'people know how to use waterways safely and do so'. This is a third level priority.
	Whanganui District Council	Support	The embayments created by the Kai iwi and Mōwhanau streams are significant sites for community recreation and food gathering.
	Whanganui Rural Community Board	Support	
Other	Horticulture NZ		NEW GOAL: Sustainable land and water management practices support the national contribution of vegetable growing to the domestic supply of fresh vegetables and maintenance of food security for New Zealanders.
Other	Whanganui District Council		Recommends that the significance and protection of the Nukumara Aquifer at Kai Iwi be recognised for its importance as the main site of Whanganui’s urban water supply.

## Social, cultural and economic wellbeing

Goal	Submitter	Position	Submitter Comment
Wai tapu	Department of Conservation	Support	
	Federated Farmers – Manawatū-Rangitīkei	Support	Notes that this is a loaded statement, as there is already a statutory requirement to implement this goal
	Federated Farmers - Tararua	Support	
	Forest and Bird	Support in part	Should be strengthened, e.g. “elevated and supported”
	Horowhenua District Council	Support	
	Ngā Kaitiaki O Ngāti Kauwhata Incorporated	Support	
	Water Protection Society	Support in part	Does not support preferential determination of water management on the basis of race or affiliation to particular groups
	Whanganui District Council	Support	
	Whanganui Rural Community Board	Support	
	Mahinga kai and food	Department of Conservation	Support
Federated Farmers – Manawatū-Rangitīkei		Support	
Federated Farmers - Tararua		Neutral	Does not support the commercial harvest of inanga (whitebait), tuna (eels) or any endangered fish species
Fish and Game - Wellington Council		Support	Recreation access should be maintained and improved. Habitat for terrestrial spp. including game birds should be maintained and improved. Consider sport fish and waterfowl to be included in mahinga kai
Forest and Bird		Neutral	Good is vague, consider healthy and/or safe
Horowhenua District Council		Support	Include mahinga kai in Manawatū FMU
Manawatū District Council		Support in part	Not a vision
Ngā Kaitiaki O Ngāti Kauwhata Incorporated		Support	
Water Protection Society		Support	
Whanganui District Council		Support	The embayments created by the Kai iwi and Mōwhanau streams are significant sites for community recreation and food gathering
Whanganui Rural Community Board	Support		
Economic prosperity	Department of Conservation	Support	
	Federated Farmers – Manawatū-Rangitīkei	Support	

	Federated Farmers – Tararua	Support	
	Forest and Bird	Oppose	Not a freshwater environmental outcome, should be removed.
	Horowhenua District Council	Support in part	REPLACE WITH: The use of land and water continues to underpin the economic prosperity of the Region, in a manner provides for the health and well-being of the Manawatū FMU
	Horticulture NZ	Support	Seeks that this be applied to all FMU
	Manawatū District Council	Support	
	Ngā Kaitiaki O Ngāti Kauwhata Incorporated	Support	
	Tararua Plantain Water Sampling Group	Support	
	Water Protection Society	Support	
Trout	Federated Farmers – Manawatū-Rangitikei	Support	Notes that this is a loaded statement, as there is already a statutory requirement to implement this goal
	Federated Farmers - Tararua	Neutral	Removal of trout at Pūkaha has improved native fish populations.
	Fish and Game - Wellington Council	Support	Considers that trout act as an umbrella species, therefore protecting their habitat encapsulates and increases protections of indigenous fish and invertebrate species across the catchment <sup>2</sup>  Wish a particular focus on improving trout habitat near urban areas.  Support protection of trout fisheries.
	Horowhenua District Council	Support	
	Manawatū District Council	Neutral	Considers this goal to broadly conflict with the health of indigenous spp. Consider that indigenous spp. will need to be prioritised in some waterbodies, and trout prioritised in others
	Ngā Kaitiaki O Ngāti Kauwhata Incorporated	Neutral	Trout and Perch are introduced species and have been detrimental to our local Iwi known fish life such as piharau and tuna
	Water Protection Society	Support	
Tongariro hydroelectric scheme	Federated Farmers – Manawatū-Rangitikei	Oppose	Hydro-electricity should not be prioritised over other water users.
	Forest and Bird	Oppose	Not a freshwater environmental outcome, should be reworked.
	Genesis Energy	Support	
	Manawatū District Council	Neutral	Does not wish the Tongariro power scheme to be prioritised over the health needs of people (drinking water).

<sup>2</sup> Edited on 15/11/2022 following further discussion with Wellington Fish and Game



Other	Water Protection Society	Flooding should be allowed, as sediment deposition contributes to fertility and regenerative agriculture.
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