

5 March 2016

Bill Wasley
Chair of Collaborative Stakeholder Group
Via email

Dear Bill,

POTENTIAL USE OF EXEMPTIONS FOR THE LOWER WAIKATO FLOOD MANAGEMENT INFRASTRUCTURE TO JUSTIFY AND SET LOWER FRESHWATER OUTCOMES FOR WAIKATO AND WAIPA RIVERS

This letter is to advise the River Iwi Governors (RIG) remain deeply concerned by the potential for WRC to use an exemption for infrastructure to undermine water quality outcomes for the Waikato and Waipa Rivers including tributaries, lowland lakes and wetlands.

River Iwi are aware that in September 2015, the Waikato Regional Council (WRC) applied to the Ministry for the Environment (MfE) for inclusion of the flood management infrastructure for the Lower Waikato, Waihou and Piako flood protection schemes into Appendix 3 of the National Policy Statement for Freshwater Management (NPS-FM). The inclusion of the flood management infrastructure into Appendix 3 of the NPS-FM provides WRC with an ability to set a freshwater objective below the national bottom lines, for an unspecified period. The RIG perceive this as a risk to achieving the water quality outcomes envisaged by Te Ture Whaimana, and a threat to the Healthy Rivers: Plan for Change/Wai Ora: He Rautaki Whakapaipai (HRWO) plan change process.

River Iwi concerns were further exacerbated when WRC staff confirmed to the Collaborative Stakeholder Group (CSG) that the main stem of the Waikato and Waipa Rivers are defined as part of the flood management infrastructure, at the CSG23 meeting on Friday 19 February 2016. The River Iwi understand that Lake Waikare and the Whangamarino wetland are also considered to be part of the flood management “infrastructure”. The inclusion of the main channel of the Waikato and Waipa Rivers in Appendix 3 potentially means WRC could set a freshwater objective lower than the national bottom lines for the entire length of the Waikato and Waipa Rivers, including Lake Waikare and the Whangamarino wetland. Such an outcome would fall well short of the expectations of River Iwi and could undermine the HRWO plan change process.

The RIG note that River Iwi have previously articulated their views as co-governors to the Healthy Rivers Wai Ora Committee (HRWOC) opposing the potential use of exemptions through the HRWO plan change process. River Iwi have also individually conveyed their concerns both to WRC and also through written submissions to the MfE-led process to populate Appendix 3 in 2015. It is surprising to RIG that WRC have opted to continue to pursue this matter when River Iwi are clearly concerned



by the potential risks and unintended consequences of WRC making a unilateral decision to use exemptions in a way that could lead to lower water quality outcomes.

River Iwi recognise the importance and value of the Lower Waikato, Waihou and Piako flood protection schemes. However, the consideration of the benefits and positive impacts of the flood management scheme should not be used as a lever to override outcomes such as achieving Te Ture Whaimana.

In summary, River Iwi remain opposed to the broad scale use of an exemption that could undermine the work being carried out by the CSG and ultimately achieving Te Ture Whaimana.

Please feel free to give Maria Nepia or myself a call to discuss this letter.

Yours sincerely



Kataraina Hodge
Chair: River Iwi Governors

Cc:

Vaughn Payne – CX Waikato Regional Council

