

17 November 2022

Ministry for Primary Industries  
Wellington 6011  
By email: [mpi.forestry@mpi.govt.nz](mailto:mpi.forestry@mpi.govt.nz)

Tēnā koutou katoa

### **National Direction for Plantation and Exotic Carbon Afforestation: Consultation document**

Water New Zealand (Water NZ) thanks the Ministry for Primary Industries (MPI) for the opportunity to comment on the National Direction for Plantation and Exotic Carbon Afforestation consultation document.

Water NZ is a national not-for-profit organisation which promotes the sustainable management and development of New Zealand's three waters (drinking water, wastewater and stormwater). Water NZ is the country's largest water industry body, providing leadership and support in the water sector through advocacy, collaboration and professional development. Its more than 3,000 members are drawn from all areas of the water management industry including regional councils and territorial authorities, consultants, suppliers, government agencies, academia and scientists.

### **Our key concern is the continued protection of water supply catchments from adverse effects due to exotic afforestation**

Forests are hugely significant to our economy, whenua Māori and wider communities, and will play a key part in supporting Aotearoa New Zealand's climate response. However, Water New Zealand is concerned that the proposed regulatory settings for plantation and carbon forestry could have negative impacts on water supply catchments. We want to ensure that drinking water supply catchments are protected, human access is limited, and any land use changes are sustainable.

Our key concern with the proposal is that it does not recognise, and therefore adequately protect, the role of drinking water supply catchments and sources from the adverse effects of exotic and carbon plantation afforestation within, immediately adjacent to, or upstream or downstream of such water supply catchments.

### **Drinking water supplies in New Zealand**

The majority of New Zealanders are supplied water by a reticulated supply (piped water distribution) from council supplies serving 4,208,511 people<sup>1</sup> or 82% of our population. These drinking water supplies can generally be divided into two sources: surface water (eg, streams, rivers, lakes) and groundwater (bores or wells). Forty percent of drinking water is supplied via groundwater with the remaining 60% of public drinking water supplies coming from surface water.

---

<sup>1</sup> Taumata Arowai Statement of Intent 2022-26.

## **Water suppliers have limited control over activities in catchment or recharge zones**

Protecting a water supply catchment essentially means public access is restricted, so the possibility of contamination from human activities is very low. Unless a catchment is protected, water suppliers have limited control over activities in surface water catchment or groundwater source recharge zones.

By way of examples:

- The majority (82%) of Auckland's water supply is sourced from protected catchments in the Hunua and Waitakere Ranges (and 2.81% from groundwater).
- In the Wellington region, 11 of the 14 water abstraction catchments lie almost entirely within the Conservation estate. As such, the risk of contamination at the abstraction points due to human activities is perceived by Greater Wellington Regional Council as low. The protected Wainuiomata/ Orongorongo Water Collection Area, designated as a drinking water catchment in 1878, has remained relatively untouched and is in a valuable remnant of mixed podocarp-broadleaf-rata lowland forest. The collection area covers 7,600 hectares, supplies 15 percent of the metro-areas annual water supply, and provides a safe and reliable source of drinking water. The remaining three of the Wellington catchments contain land upstream of the supply abstraction points that are in private ownership and put to various uses. Within these catchments human activities have high risk of impacting drinking water quality.

In unprotected drinking water supply catchments suppliers are also unlikely to be informed if there is a change of activities in their catchment that could lead to a decrease in source water quality.

## **The importance of protecting source water**

Land-use activities, potential sources of contamination, and other water users that affect source water can contaminate an entire drinking water supply and cause illness to those who consume it.

Water suppliers are required to prepare and implement Source Water Risk Management Plans under the Water Services Act 2021, s43 (the Act) as part of their drinking water safety planning, outlining the hazards and risks associated with the water that they abstract to use as drinking water and how these will be managed.

The Act interfaces with the Resource Management Act 1991 (RMA), and regulations made under it (including the National Policy Statement for Freshwater Management 2020 (NPS-FW) and the National Environment Standards for Sources of Human Drinking Water (NES-DW)). In particular, suppliers must have regard to values identified by local authorities under the NPS-FW that relate to the freshwater body that the supplier uses as a source. These values provide information about significant characteristics of the source water and the risks they may present.

The 2022 NES - HDW were proposed to rectify this situation and give drinking water quality significantly more weight within this overall framework.

## **The right forest planted in the right place, and managed in the right way**

Safe, reliable and sustainable drinking water requires active protection and management of water supply catchment areas. Ideally, under this national direction access to water supply lands remains restricted and limited to reduce the risk of water contamination.

Afforestation can affect ground and surface water volumes immediately adjacent to, or upstream or downstream of public water supply catchments and sources. Wider externalities of poorly managed forestry on water catchment areas and raw water quality include fire hazards, plant and animal pest control, loss of biodiversity, and erosion and sedimentation. Harvesting pine plantations can also damage rivers, marine environments (Tolaga Bay for example), and other land uses.

As part of routine management, water collection areas are regularly monitored to identify threats to water quality and supply. Rainfall and stream flows and water quality are actively monitored. Catchments are checked for wilding pines, vegetation health and loss of vegetation cover from pest animal browsing.

The protection of public drinking water supply catchments and other water sources, especially as adverse climate change impacts become more apparent on freshwater quality and freshwater allocation, is paramount.

### **Te Mana o te Wai refers to the vital importance of water**

Te Mana o te Wai is focused on restoring and preserving the balance between water (wai), the wider environment (taiao), and people (tangata), now and in the future. It ensures the health and well-being of the water is protected and human health needs are provided for before enabling other uses of water.

As an overarching concept, Te Mana o te Wai applies to all parts of the water cycle and the water industry. Each and every person, with a water services function, power, or duty must give effect to Te Mana o te Wai - and respect the kaitiakitanga obligations of mana whenua, in a manner that aligns with mātauranga-a-iwi.

Te Mana o te Wai is reflected in the Water Services Regulator Act 2020, the Water Services Act 2021, the Water Services Entities Bill, the (Te Mana o te Wai Statements for water services) and the concept is defined in the NPS-FW (Te Mana o te Wai objective within a Regional Policy Statement).

Water NZ is concerned the proposed regulatory settings -and the impacts on water supply catchments noted above- potentially adversely impact on Te Mana o te Wai.

### **Relief sought**

Access to, and use of, drinking water catchments should be managed in order to protect water quality and public health.

Water NZ recommend that territorial authorities should have greater discretion, via the RMA planning and consenting processes, to consider the adverse effects from proposed forestry activities on drinking water supply catchments and source areas.

Mechanisms proposed under the 2022 NES - HDW consultation would enable recognition and protection. We advise the National Environmental Standards for Plantation Forestry be cognisant of and aligned with the proposed amendments to the NES - DW.

In the interim we strongly support an increased RMA regulatory role for territorial councils in relation to, planning for and the consenting of, such afforestation activities for both carbon forestry and plantation forestry land uses.

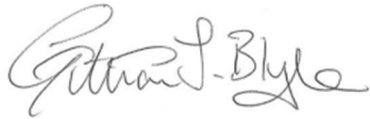
We also support -

- Amending the NES-PF to require the use of Forest Management Plans to ensure forests are managed effectively and forest owners cannot 'plant and walk-away' (Consultation document Part A).
- Alignment of Part D with NPS-FW and the NES FW to enhance the natural environment by supporting biodiversity, improve water quality, stabilise erosion-prone land and meet Te Mana o te Wai.
- Adding an amendment to Part D to give effect to Te Mana o te Wai to the section *Enabling Foresters and Councils To Better Manage The Environmental Effects Of Forestry*.

- Part D embracing tikanga Māori approaches – including kaitiakitanga (intergenerational sustainability), manaakitanga (care and reciprocity) and whanaungatanga (connectedness and relationships) support whenua Māori to practice kaitiaki and tino rangatiratanga .

Water NZ thanks the Ministry for the opportunity to provide comments on the consultation document. If you have any queries in relation to this submission please contact [Nicci.Wood@waternz.org.nz](mailto:Nicci.Wood@waternz.org.nz)

Ngā mihi nui

A handwritten signature in black ink, reading "Gillian Blythe". The signature is written in a cursive, flowing style.

Gillian Blythe

Chief Executive