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FORM 3
**SUBMISSION ON PROPOSED NATIONAL POLICY STATEMENT
FOR FRESHWATER MANAGEMENT**

(Sections 49 and 57, Resource Management Act 1991)

This is a submission on the following proposed national policy statement (the **proposal**):

Proposed National Policy Statement for Freshwater Management

The specific provisions that this proposal relates to, and the changes sought, are set out in the attached document. This submission is made on behalf of the New Zealand Forest Owners Association

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SUBMISSION ON PROPOSED NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT

The New Zealand Forest Owners Association (NZFOA) thanks the Board of Inquiry for the opportunity to submit on the Proposed National Policy Statement (“NPS”) for Freshwater Management. This Submission has been prepared by the NZ Forest Owners Association.

The NZFOA welcomes the opportunity to make submissions to the Board of Enquiry and requests that it also be heard in support of this written submission. If others make a similar submission, we will consider presenting a joint case with them at the hearing.

INTRODUCTION

The NZ Forest Owners’ Association is a voluntary organisation representing the interests of commercial forest growers, facilitating cooperation and coordination within the forest industry. NZFOA member companies collectively manage around 1.4 million ha of rural land, 80% of which is planted in trees, and represents approximately 80% of the national forest estate.

Key Industry Facts:

- Forest products exports for the five years to June 2008 averaged NZ\$ 3 billion, accounting for 10% of New Zealand’s merchandise trade¹. The forestry contribution to GDP in this period was 3%² and is forecast to significantly increase its share over the next 15 years.
- Plantation forest covers approximately 1.8 million hectares. (Total area of New Zealand is 26.7 million hectares). This equates to 7% of New Zealand’s total land area².
- Plantation forest harvest in 2008 was just over 20 million cubic metres, with 14 million cubic metres processed in New Zealand and 6 million cubic metres exported as logs², with the capability to increase to around 30 million m3 pa in the near future if market conditions and competitive domestic operating environment allow.

¹ MAF Statistical Release – Exports of Forestry Products

² NZFOA – Facts and Figures 2008/09.

SUMMARY

1. The NZFOA considers that the NPS should be withdrawn unless the focus on “Land use Development” is changed to “Land use”.
2. The challenge for the Proposed NPS is to address the quality and quantity of freshwater resources in New Zealand. Logically it would seem that the focus needs to be on takes, uses and discharges to water as opposed to focussing on land use or Land-use Development. It is not land use change that affects water quality and quantity but the effects of activities associated with land uses, such as takes of water for stock, irrigation, effluent discharges etc.
3. Regulation of these water related takes, uses and discharges is entirely consistent with the provisions of the Resource Management Act (“RMA”) which allow for the introduction of regional and (in the case of surface water), district rules that enable plans to require compliance with potentially higher standards. By contrast, regulation of Land-use Development is not consistent with the RMA.
4. Reference to, and the concept of, Land-use Development which is central to the NPS as currently drafted is flawed. The proposed definition of Land-use Development lacks clarity and creates uncertainty throughout the document.
5. An NPS should treat water polluters equitably, regardless of whether they are existing water users or proposed. The underlying basis, as is the case with the RMA when it is correctly applied, should be for the polluter to pay.

The focus on Land-use Development in the proposed NPS appears to be an attempt to override the need for councils to make rules that will affect all land owners equitably by allowing councils to target legitimately those wishing to develop their land. The result will be local government regulation which will have the effect of restricting flexibility of land use. This will cause economic distortions in land values and discourage, rather than encourage, conversions to forestry.

6. The NZFOA would also welcome an opportunity to be heard in support of this submission.

1.0 PRINCIPLES SOUGHT BY THE NZFOA

The NZFOA considers that any regulation or policy to manage freshwater should be consistent with the following principles:

- 1.1 **Effectiveness.** The status quo regarding freshwater quality is unacceptable. This is clearly outlined in the “Preamble” to the “Proposed NPS for Freshwater Management”. Therefore any policy must relate to current and proposed water use.
- 1.2 **Simplicity.** Policy objectives should be easily understood and implemented by those who are affected by it;
- 1.3 **Equity.** There should be equity of implementation across all New Zealand regions and for different sectors of the economy;
- 1.4 **Relevance to New Zealand.** The policies need to recognise the characteristics of the New Zealand political structure (Local Authorities), economy, biology, geology and hydrology and be developed accordingly;
- 1.5 **Sustainability.** To be sustainable, the policy must be effective and equitable.
- 1.6 **Scientifically supportable.** The policy must result in improved freshwater management. The policy must identify the real goal – “Maintenance or Improvement of the Freshwater Ecosystem, while allowing society to utilise these resources to generate goods and services”.

When analysed against these principles, our main concern is that the proposed NPS will not be effective in improving the quality of freshwater and the objectives and policies proposed lack equity. We expand on this further in our submission.

2.0 OVERVIEW

General Concerns Relating to Freshwater Management

The NZFOA has a number of concerns relating to the current management of freshwater in New Zealand. We set these out at this point to provide an appropriate framework for our later comments on particular aspects of the NPS.

- 2.1 The quality of the water in New Zealand is reported to be declining, therefore there must be a focus on existing water rights as well as new water rights;
- 2.2 We are aware of at least one Regional Council that has been placing restrictions on the establishment of new forests because of the use that trees make of water that falls on the forested land. Much of this apparent use is due to taller vegetation intercepting rainfall with subsequent evaporation and transpiration back to the atmosphere. The rationale for the restriction is that the Council wants more water to flow to lower parts of catchments so that it is available for purposes such as irrigation. The NZFOA is opposed to restrictions such as this on some properties to benefit others. The restrictions

also ignore the fact that that the original natural vegetation of the property proposed to be planted may have been forest and that if forest is not established on the land there is a possibility that it could be allowed to revert to scrub (and possibly eventually forest) so that the interception of rainfall may happen anyway;

- 2.3 Restrictions on establishment of forests based on water yield considerations usually ignore the positive benefits that forests can have on water quality (less sedimentation, reduced peak flows, less chemicals compared with some alternative land uses) and on other factors such as reduced soil erosion and greater carbon sequestration and storage;
- 2.4 There is an apparent willingness by some Councils to impose further restrictions on forest land because of recognition of the positive benefits (for water quality and other purposes) of forests and a concern that a reduction in forest area will reduce those benefits. It is inequitable to restrict **land use change** because it could result in potential degradation of water quality. Instead, all water users / polluters (existing and new) should pay according to the level of pollution or use. If a change of land use results in degraded water quality, it is not the party who exits the benign land use who should be regulated to stop them exiting, but the party who made the decision to enter a land use which is less benign.

The NZFOA interprets section 5 of the RMA to mean that it is the responsibility of those whose activities create adverse effects to undertake (at their cost) the avoiding, remedying and mitigation, rather than that responsibility being transferred to other land users or society at large.

However, this is not the interpretation applied by some Regional Councils. In the case of Lake Taupo, for example, concern for the degradation of the water in the lake because of the intensification of agriculture in the catchment has led to the imposition of controls on changes in land use. The regulations are based on the level of nutrient discharge from land at the time the regulations were introduced. So a dairy farmer may continue operations at the same level of pollution. Conversion to a lower polluting land use will generate credits, which could be sold to another land owner who wanted to intensify land use operations. But for a forest owner, it is now virtually impossible, except at considerable cost, to change existing forest land in that catchment to any other land use (such a change would require purchase of credits). Thus the polluter is rewarded for reducing pollution (rather than being required at his/her cost to remedy or mitigate the adverse effect), while the forest owner has been penalised by a loss of options for the future use of the land. This has, and still is, acting as a severe deterrent to additional forest plantings in this region.

- 2.5 The NZFOA is aware of other examples of inequity of treatment between land uses such as the Lake Taupo example. One result of these is that it actually encourages the conversion of forest land to more intense land uses. There at least two reasons for this:
- 2.5.1 The apparent lack of a requirement for a land use to avoid, remedy or mitigate an adverse effect is effectively a subsidy to that land use. This

is seen as a positive benefit to that land and will be included, consciously or unconsciously in the value of that land. This means that land capable of supporting such use (even if not actually being used for that use) will have a higher value and this will both inhibit purchase of such land for less intensive uses and will also encourage change of land use to the subsidised activity;

2.5.2 Once Regional Councils start implementing regulations such as those applying in the Lake Taupo catchment, land owners outside that catchment have an incentive to convert their land to the highest polluting state that it is capable of supporting. This is so that land will receive similar benefits (subsidies) to those of dairy farmers referred to above in the event that similar regulations are introduced in their region. It can be argued that at least some of the conversions of forest to dairy farming in the Waikato catchment below Lake Taupo are a reaction to the Lake Taupo regulations. In a similar reaction to incentives, much of the deforestation that took place in various regions (including the Waikato) prior to 31 December 2008 was a direct result of the government's decision to charge land owners for loss of carbon storage from deforestation that was implemented in the Emissions Trading Scheme legislation. In both examples, one effect is likely to be a further reduction in the quality of the water in the Waikato River;

2.6 There is a tendency of some Regional Councils to manage particular phases of the operation of a particular land use rather than to view the whole life cycle of the land use. Forestry is a long term investment with a rotation cycle of 28 – 50+ years.

At the time of harvest of the forest crop, there is often some increased adverse impact on water quality (much of which can be managed by good practice), but if the land is reforested, the period of degradation can be relatively short (two to three years). Taken over the full life cycle of the crop, the adverse effects from forestry will be substantially less than those from other land uses. Excessive controls on the short period of disturbance overlooks the long term positive benefit arising from the whole operation and may have a negative effect on forest investment (again an effective subsidy to those operations that have much greater long term impacts on water quality). Water policy needs to focus on long term trends and averages, not points in time and place.

Policies by the Auckland Regional Council are restricting investment in forestry in the Auckland region to the extent that forest owners are actively re-considering investment. The impact on water quality eventually is likely to be negative as land uses other than forestry are favoured.

2.7 The NZFOA is also concerned that the term “land use change” is inadequately defined. We submit that the application of the definition of “land use change” must be consistent for all Local Authorities and must apply to the following:

- a change from forest use to agricultural use,
- a change from low intensity farming to high intensity farming. ie: sheep farming to dairy, an intensification of a dairy or other farming operation.

The over-riding factor must be the impact on the freshwater ecosystem, not the fact of land use change itself.

The NZFOA would welcome a NPS on freshwater management that incorporated the above provisions.

3.0 IMPACT ON LAND VALUES AND LAND USE

FLEXIBILITY

The NPS does not address the underlying drivers of inevitable changes in market demand for goods and services. The focus in the NPS on change or intensification limits the focus on the effects of activities and points the finger squarely, and unfairly, at change alone.

- 3.1 Regulation of resource use on any basis other than equitable effects based limits which apply to all land uses with the same or similar effects directly impacts on land value and the ability to rate. Assuming all other factors are equal the overall consequence is a loss in capital value of land which is subject to inequitable regulation.
- 3.2 A feature of the development of New Zealand's primary industry has been its history of interchange of land use in response to changing domestic and international market demand. Market trends have led to rural land use being changed in a multitude of different ways and these trends will continue to rise and fall for the foreseeable future. Past attempts to prevent land use change by way of financial subsidy culminated in significant financial hardship and a tumultuous period of adjustment when controls and subsidies were recognised as financially and environmentally unsustainable. The New Zealand primary export sector has always responded to market signals by changing the proportion of its land devoted to different products in order to achieve the highest and best returns. In the 1950s it was wool, in the 1990s forestry, in the early 2000s lamb, and more recently there has been a dairy boom. Smaller industries, including kiwifruit, wine and deer, have also delivered superior returns in key New Zealand regions at different times. Poor and stony soils that once had very little value for sheep and beef production are now highly prized and priced for viticulture.
- 3.3 Controls imposed on one landowner in order to shield another's perceived right to pollute at levels in excess of the environmental carrying capacity effectively removes land use flexibility and creates perverse incentives. For example, it could motivate existing resource users to maximise their "allowable pollution" to preclude competition from new entrants and to secure the right to continue to create adverse effects at existing levels for the future. A secure right to create adverse effects reduces or eliminates the motivation in research and development to reduce that effect, even where the information and technology is available.
- 3.4 Use of this Proposed NPS to require a selective approach to environmental management standards based on "existing" and "new" activities is a fundamental change to the RMA. The current presumption under section 9 of the RMA is that land use is permitted. The same presumption does not exist with respect to water (ss 14-15).

- 3.5 The existing use rights provisions of the RMA show a clear intention to treat land use controlled by districts and regions differently: district rules may not affect existing land uses (s10) in contrast to operative regional rules which may (s20A). However, even district councils may not apply existing use rights in perpetuity to the use of surface water (s10A). Thus new plan rules which control discharges of contaminants or takes of surface water permit limited existing use rights where a rule requires consent. This distinction creates a presumption that existing uses are not treated differently; it is the effects of these activities that need to be addressed regardless of the order of priority in which they were established. It is submitted that Parliament would have created existing use rights in perpetuity for both regional and district council matters had it assessed that this was appropriate. Instead it concluded that water quality (particularly) was of such concern that it opted to create a presumption to remove existing use rights over time.
- 3.6 The NPS, focussing as it does on changes in land use may be used as justification for distinguishing between new and existing users with differing standards applying to each. As noted in the s32 Report “In practice, the connections between freshwater management and land-use planning have been variable”. The NPS policies will only encourage the grand-parenting of existing discharges and delay the need, for example, for councils to address the lack of connection between freshwater management and land use planning.
- 3.7 We have placed emphasis on the potential for the NPS to delay, rather than avoid having to address, the environmental effects of activities. It is our strong contention that controlling land use change will concentrate land use in its current location, with consequential intensification of adverse effects. A control on all land use change including intensification must logically lead to economic stagnation and a perverse lack of incentive to address the adverse effects of ‘existing’ activities as a means of maintaining the property right associated with those sanctioned rights.
- 3.8 Although the taking of water has been treated as a finite resource and deemed to be subject to the “first in first served” approach, this doctrine, has to date, not been applied to land use and the development of land and its assimilative capacity. The NPS therefore represents a fundamental change to existing practice and principles. Such an approach is not a basis for sustainable management of a resource.
- 3.9 Under the RMA there is an overlap of regulatory responsibility which has resulted in systemic failures to address the environmental effects of some activities. It is submitted that this is the real issue – not the effects associated with change. The tools exist under the RMA for councils to address the connections between freshwater management and land use planning, but for largely political reasons this has not occurred. The NPS attempts - and fails - to plug this gap because it addresses Land-Use Development.

4.0 SUMMARY

The consequences of adopting the NPS in its current form include:

- 4.1 Differential regulation of two resource users with equivalent adverse effects will logically disadvantage the resource user facing a greater regulatory cost. This

type of approach simply reduces the incentive for innovation and development by preserving the status quo. For example, forestry which has positive effects on climate change and water quality will be captured under the term “Land-use Development”. Conversely, equitable imposition of environmental regulation motivates all activities having adverse effects on the environment to innovate to maximise their resource use within the constraints of the prescribed ‘environmental bottom line’.

- 4.2 Differential regulation of two activities with equivalent effect is by inference a subsidy to the resource user facing the reduced regulatory impost. At its worst, differential regulation of two activities with the same adverse environmental effects transfers the costs of one operator’s environmental effects onto another commercial competitor. Existing operators ‘prosper’ rather than ‘pay’.
- 4.3 Forestry has relatively few adverse environmental effects relative to many of the permitted predominant alternative land uses. Constraining changes in land use away from forestry has the effect of devaluing forest land relative to equivalent land used for other more polluting uses. The consequence is an increase in the perception of the risk associated with investing in forestry. Land owners will be reluctant to invest in forest plantings if that were to represent a loss of the ability to change out of forestry in the event that returns from forestry may be uneconomic at some time in the future. This risk is increased because of the long time between investing in forestry (establishing a forest) and realising that investment (harvesting the mature trees). Any actions by government during that cycle that appear to “change the rules” increase the perception that governments will do this again and will therefore reduce the willingness to invest in forestry in the future.
- 4.4 Substantial areas of New Zealand’s forest plantings are in joint Maori ownership. A change in the emphasis within the RMA to differential constraint on land use change and development based on the date an activity was started will have a detrimental effect on the value of Maori owned forestry land. This is potentially inconsistent with the Treaty of Waitangi guarantee of undisturbed possession of lands and forests.
- 4.5 Regulatory failure which to date has failed to address the adverse effects of existing users’ activities does not justify constraint on new entrants in an attempt to minimise further pollution.
- 4.6 In seeking equitable treatment of land uses the NZFOA also recognises that a resource consent constitutes a right to utilise a natural resource including assimilative capacity for the duration of that consent. The NZFOA therefore understands and accepts that regulation based on “instantaneous” imposition of effects based rules creates unreasonable uncertainty and is likely unreasonable and unworkable. The NZFOA suggests that the timeframes contemplated between review/renewal of resource consents, and review of regional planning documentation allowing for ‘permitted activities’, provides an adequate lead time for those with existing investments to adjust to changes.

5.0 THE NZFOA SEEKS THE FOLLOWING:

- 5.1 Withdrawal of the document as a whole.
- 5.2 In the event that the document is not withdrawn the adverse consequences that will follow must be minimised. To do this the NZFOA seeks such amendments as are necessary to give effect to the views of the NZFOA outlined in the Overview section of this submission with respect to the NPS; and such amendments as are necessary to make the NPS equitable, effective, reasonable and workable in a manner consistent with the reasons for the submissions.
- 5.3 Reference to, and the concept of, Land-use Development, which is central to the NPS is flawed. The proposed definition of Land-use Development is “Land-use Development includes land-use intensification, land-use change, and subdivision of land.” This definition lacks clarity and creates uncertainty throughout the document. For example, it is unclear if increasing the carrying capacity of a dairy, sheep or beef farm qualifies as “land-use intensification”.
- 5.4 Each of the aspects of the definition (land-use intensification, land-use change, and subdivision) refers to a transient state. Intensification, change and subdivision are not ongoing activities but the processes by which an activity proceeds from one state to another. Subdivision for example, relates to the legal process by which land is divided into smaller lots. The effects of the activity relate to the subsequent manner in which the land can be used, not the subdivision per se. Land use change is likely to alter existing effects but this may be positive, negative or a combination and may depend on an individual’s perspective. Focusing on “change” is a short term, reactionary response that fails to take into account ongoing effects. Land-use Development per se does not affect water quality and quantity: it is the consequential effects arising from the way in which the land is subsequently used that affects these issues.
- 5.5 It is unclear to what extent the phrase “Land-use Development and discharges of contaminants” when read in conjunction with the definition of Land-use Development, requires any consideration of existing discharges. On the face of the matter it would appear that the reference to “discharges of contaminants” relates to Land-use Development which is future oriented. This is inconsistent with the intent of the Preamble and lacks clarity. Further there is no definition of land use change. Does land use change occur at the time of the harvesting of a forest? What if it is not economic to replant that forest and it is allowed to revert to scrub. Does either of these situations fall within the definition and if so, is it possible that the NPS is mandating councils to require a use of land? If so, this is inconsistent with the current legal position and represents a significant change to the law.

6.0 THE NZFOA SEEKS THE FOLLOWING CHANGES IF THE DOCUMENT IS RETAINED:

- 6.1 Ensure that the references to land use are defined in a manner that includes existing and new land uses. Delete all references to Land-use Development.
- 6.2 The Preamble proposes to “address the effects of existing and future discharges of contaminants to Freshwater Resources”. However, there is no specific mention of existing land uses and discharges associated with existing land use in the remainder of the document. This omission needs to be amended.
- 6.3 It is noted that there is reference to “alternative land uses” in the third paragraph of the Preamble but this term is not defined and lacks any contextual reference. What are these land uses an alternative to? The status quo? It would be more appropriate to refer to “differing land uses” recognising that, for example, different types of crops will have different water requirements. Delete reference to “alternative land uses”.
- 6.4 The Objectives:

The majority of the Objectives appear focussed on regulating changes from future Land-use, examples being:

- Objective 2 – “To ensure effective integrated management... of the effects of Land-use Development...”;
- Objective 4 – “To ensure the life supporting capacity and ecological values of Freshwater Resources are recognised and protected from inappropriate - ... (b) Land-use Development; and ...”;
- Objective 5 – “To control the effects of Land-use Development... to avoid further (emphasis added) degradation of Freshwater Resources”;
- Objective 6 – “To ensure that demands... for fresh water are sustainably managed in a manner that has regard to ... (a) available supply of fresh water ...”.

The NPS however, fails to set out the Issues with respect to Land-use Development then establishes a series of objectives without any context. Specific comments in respect of the objectives are set out below.

6.4.1 Objective 1

Section 45 of the RMA states that the purpose of an NPS is to state the objectives and policies for matters of national significance that are relevant to achieving the purpose of the Act.

Objective 1 is the only objective of the nine contained in the RPS that refers to economic factors. This is essentially a restatement of s5 without reference to the provisos of that section. It does little if anything to inform the debate or set the scene for the appropriate policies. It is a mixed reference to a number of factors including social and cultural matters. It is no surprise that the related policies fail to address economic issues and as noted, effectively mandate limited growth opportunities through the requirements on councils to actively control Land-use Development.

6.4.2 Objective 2

This objective focuses on regulation, Land-use Development and change. If the intent is to address existing and future discharges this is not clear. Inclusion of the term Land-use Development suggests regulation of those activities as defined is to be addressed in preference to existing uses / discharges.

Despite the fact that the s32 report identifies that there is a gap between freshwater management and land-use planning within many councils, objective 2 falls short of setting the framework for plugging that gap. The objective refers to Land-use Development and discharges of contaminants but does not incorporate any reference to takes and uses of water, and by definition excludes existing land uses from the objective. It is thus difficult to see how integrated management can be achieved when, for example, the use of water by existing land uses is excluded.

6.4.3 Objectives 4 and 5

For the reasons set out above, the references to Land-use Development are inappropriate and unreasonable.

The NZFOA seeks the following changes to the Objectives:

Delete references to Land-use Development within the Objectives. If the NPS is to be retained, change the focus of the document to existing and future land uses while incorporating reference to those matters set out in Part 3 of the Act.

Ensure that Objective 2 addresses takes and uses of water in a manner consistent with the relevant sections of Part 3 of the RMA (e.g. sections 14 and 15).

6.5 POLICIES AS TO REGIONAL POLICY STATEMENTS

Policy 1

6.5.1 The NZFOA adopts the reasons set out above in relation to the Overview and definition of Land-use Development.

In the event that the NPS addresses all land uses equitably NZFOA is concerned that Policy 1 will allow Councils to regulate to retain or control existing forestry where that use is currently contributing to high quality freshwater resources. The policy could be used as justification for preventing or controlling harvesting of an existing land use on the basis of non point source discharges of contaminants or simply because land use change occurs at the time of harvesting. Similarly this policy could be interpreted as requiring the ongoing existence of forestry as a means of providing environmental benefits to downstream waterways and users.

The NZFOA seeks the following changes to Policy 1:

Delete policies 1(a) to (c).

Delete all references to Land-use Development and replace with “land use”.

In policy 1 (h), replace the words Land-use Development and discharges of contaminants” with the words “land use”.

Add to policy 1(j) a new (iii) “by recognising existing infrastructure and investment and the need for new development and growth.”.

6.6 POLICIES AS TO REGIONAL AND DISTRICT PLANS

Policies 2 and 3

6.6.1 Policies 2 and 3 contemplate new conditions for permits granted after the date of commencement of the NPS. There seems to be no distinction between the renewal of an existing permit and the granting of a new permit in terms of recognising existing investment and infrastructure.

In policy 2(c)(iii)(C) it is unclear how discharge permits will include conditions for the integrated management of Land-use Development. A better approach would be to require councils to examine discharges associated with land uses to ensure that these are understood as requiring a discharge permit and thus actively managed as such (for example, nitrate). There is provision for this within the RMA but it is often overlooked by councils. Thus the integrated management of the effects of land use in relation to water are poorly regulated or are frequently permitted without differentiation.

To summarise Policy 3, it requires that territorial authorities include rules that require land use and subdivision consents granted after the commencement of the NPS to include conditions relating to freshwater issues.

There is a need for an integrated approach to land use which includes climate change and the impacts of the ETS. It is apparent from the s32 Report that integrated management is not being achieved as between regional and territorial authorities. However, with its focus on Land-use Development it is difficult to see how or why these policies would improve the current situation.

The NZFOA seeks the following changes to Policies 2 and 3:

Amend the policies to recognise better the balance between existing economic investments, new development and freshwater management.

Remove reference to Land-use Development.

Delete Policy 3(b) and (c).

6.7 POLICIES AS TO THE PREPARATION OF POLICY STATEMENTS AND PLANS

Policies 4 and 5

Policy 4(c) and (d) recognise the needs of industry and existing economic investments and are supported. However, there is no recognition that economic well being is derived from growth and that not all growth is negative.

In policy 5, for the reasons throughout this submission and with respect to policy 3 the reference to Land-use Development is inappropriate.

The NZFOA seeks the following changes to Policies 4 and 5:

Add words which expressly recognise economic growth as important to the future well being of people and communities.

Delete reference to Land-use Development.