

## **Ordinary Meeting**

Monday 7 May 2018

10.00am

Taranaki Regional Council, Stratford

To hear submissions on the 2018/2028 Long-Term  
Plan



**Agenda for the Ordinary Meeting of the Taranaki Regional Council to be held in the Taranaki Regional Council chambers, 47 Cloten Road, Stratford, on Monday 7 May 2018 commencing at 10.00am to hear submissions on the Council's 2018/2028 Long-Term Plan.**

<b>Councillors</b>	D N MacLeod M J Cloke M G Davey M P Joyce D L Lean C L Littlewood M J McDonald D H McIntyre B K Raine N W Walker C S Williamson	(Chairman)    (Deputy Chairman)
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**Apologies** Councillor D H McIntyre

**Notification of Late Items**

<b>Item</b>	<b>Page</b>	<b>Subject</b>
Item 1	3	<p>Hearing of Submissions on the Consultation Document for the 2018/2028 Long-Term Plan</p> <ul style="list-style-type: none"><li>• List of Submitters who wish to be heard</li><li>• Submissions received on the 2018/2028 Long-Term Plan</li><li>• Submissions 1-19</li><li>• Submissions 20-40</li><li>• Submissions 41-55</li><li>• Officer's Report on the submissions received</li></ul>

## Agenda Memorandum

**Date** 7 May 2018



**Memorandum to  
Chairperson and Members  
Taranaki Regional Council**

**Subject: Hearing of Submissions on the  
Consultation Document for the  
2018/2028 Long-Term Plan**

**Approved by:** M J Nield, Director – Corporate Services  
BG Chamberlain, Chief Executive

**Document:** 2043184

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### Purpose

The purpose of this memorandum is to introduce the submissions on the Consultation Document for the *2018/2028 Long-Term Plan*, hear those submitters who wish to speak to their written submission and to recommend any changes to the *Plan*.

### Recommendations

That the Taranaki Regional Council:

1. receives and acknowledges with thanks the submissions forwarded in response to the Consultation Document on the *2018/2028 Long-Term Plan* and supporting documentation
2. adopts the recommendations contained within the attached officer's report and, as a result of submissions, amends the *2018/2028 Long-Term Plan* supporting documentation appropriately
3. notes the amended *2018/2028 Long-Term Plan* and estimates will be audited and then adopted at the Council's Ordinary Meeting on 15 May 2018.

### Background

Pursuant to the *Local Government Act 2002*, the Council has prepared a Consultation Document and supporting documentation to enable the preparation and adoption of its *2018/2028 Long-Term Plan*. The Consultation Document is part of the public consultation process pursuant to section 83 of the *Local Government Act 2002*.

### Discussion

The Consultation Document and supporting documentation for the *2018/2028 Long-Term Plan* were adopted on 20 February 2018 and publicly notified as being available for submissions on 3 March 2018. The submissions closed on 6 April 2018.

A total of 55 submissions were received. Attached to this memorandum is a schedule of those submitters who wish to present their submission.

Attached to this memorandum is a summary of the issues raised in the submissions. The summary includes officer's comments and any amendment recommendations. A copy of each of the submissions is also attached.

The process at this meeting is to hear all those submitters who wish to present their submission, to consider and make recommendations on all of the submissions.

### **Informal feedback**

The Council used digital media to inform and engage with the Taranaki community about its Consultation Document on the *2018/2028 Long-Term Plan* and supporting documentation, for four weeks in March and April. This resulted in informal feedback from the public, while the formal submission process also ran.

### **Social media**

The majority of feedback on social media was in favour of the proposals in the Consultation Document on the *2018/2028 Long-Term Plan*. In total, about 232 people engaged with content, giving informal feedback on the Council's Facebook, Twitter, and Instagram accounts.

Social media content included a video, images and articles and informal feedback was shown with comments or 'liking' the content.

### **Facebook**

The majority of Facebook comments (14 in total) were supportive of the idea to link Pukeiti to the Taranaki Crossing project. A smaller number of comments included concerns about the use of 1080 and defending farmers accused of causing dirty waterways.

These comments or reactions were made after a video was published, called 'Our future Taranaki', which explained the Consultation Document on the *2018/2028 Long-Term Plan*. It featured Chairman David MacLeod, Cr Charlotte Littlewood and Cr Michael Joyce, and received 5,544 views, with 185 people engaged (commenting and/or sharing the video on Facebook). There were another two Facebook posts about the proposed LTP, which also generated some comments.

### **Talking Taranaki - email newsletter**

Information about the Consultation Document on the *2018/2028 Long-Term Plan* was also published in the Council's bimonthly email newsletter *Talking Taranaki*, which was sent to 6,519 people.

As a result of the decisions made, the *2018/2028 Long-Term Plan* will be finalised, audited and presented for adoption at the Council's Ordinary Meeting on 15 May 2018. It is proposed to set the rates for 2018/2019 at the same Ordinary Meeting.

### **Decision-making considerations**

Part 6 (Planning, decision-making and accountability) of the *Local Government Act 2002* has been considered and documented in the preparation of this agenda item. The recommendations made in this item comply with the decision-making obligations of the *Act*.

### **Financial considerations—LTP/Annual Plan**

This memorandum and the associated recommendations are consistent with the Council's adopted Long-Term Plan and estimates. Any financial information included in this memorandum has been prepared in accordance with generally accepted accounting practice.

### **Policy considerations**

This memorandum and the associated recommendations are consistent with the policy documents and positions adopted by this Council under various legislative frameworks including, but not restricted to, the *Local Government Act 2002*, the *Resource Management Act 1991* and the *Local Government Official Information and Meetings Act 1987*.

### **Iwi considerations**

This memorandum and the associated recommendations are consistent with the Council's policy for the development of Māori capacity to contribute to decision-making processes (schedule 10 of the *Local Government Act 2002*) as outlined in the adopted long-term plan and/or annual plan. Similarly, iwi involvement in adopted work programmes has been recognised in the preparation of this memorandum.

### **Legal considerations**

This memorandum and the associated recommendations comply with the appropriate statutory requirements imposed upon the Council.

### **Appendices/Attachments**

Document 2020725: Officer's Report on the submissions received on the Consultation Document and supporting documentation for the *2018/2028 Long-Term Plan*  
Documents 2027216, 2035986 and [2037255](#): Submissions received on the Consultation Document and supporting documentation for the *2018/2028 Long-Term Plan*

Ordinary Meeting to hear submissions on the 2018/2028 Long-Term Plan - List of Submitters who wish to be heard

<b>Submission Number</b>	<b>Organisation/Individual</b>	<b>Represented by</b>	<b>Time</b>
54	Pukeiti Rhododendron Trust	Gordon Bailey?	10.00am
12	Wild for Taranaki	Roy Weaver & Kirstin Foley	10.15am
31	Venture Taranaki Trust	John Haylock	10.30 am
33	Federated Farmers	Lisa Harper	10.45 am
16	Sport Taranaki	Howie Tamati	11.00 am
5	Ian Armstrong		11.15 am
53	Eltham/Kaponga Community Board	Maree Liddington	11.30 am
46	Taranaki Mounga	Jan Hania & Sean Zieltjes?	11.45 am
30	Clive Neeson		12.00 noon
22	Taranaki CDEM	Craig Campbell-Smart	12.15pm
LUNCH			<b>12.30-1.00pm</b>
48	Te Korowai o Ngaruahine Trust	Louise Tester & possibly Allie Hemera-Wahanui	1.00 pm
37	Climate Justice Taranaki Inc	Catherine Cheung	1.15 pm
2	Kindergarten Taranaki	Lizzy Brouwers	1.30 pm
40	Stratford Primary School	Marlene Lewis & 2 students	1.45 pm
34	Toimata Foundation	Kristen Price	2.00 pm
38	Sustainable Taranaki	Kati Freeman	2.15 pm
14	Fish and Game Taranaki Region	Allen Stancliff	2.30 pm
42	Rotokare Scenic Reserve Trust	Simon Collins	2.45 pm

Ordinary Meeting to hear submissions on the 2018/2028 Long-Term Plan - List of Submitters who wish to be heard

<b>Submission Number</b>	<b>Organisation/Individual</b>	<b>Represented by</b>	<b>Time</b>
29	Adrian Lobb		3.00 pm
20	Taranaki's Historic Cathedral Project	Jenny Goddard & Cathy Thurston	3.15 pm
36	Forest Owners Association (flying in)	Venise Comfort	3.30 pm
43	Taranaki District Health Board	Jonathan Jarman	3.45 pm
45	Taranaki Energy Watch	Sarah Roberts	4.00 pm
35	Plastoil Recycling	Graeme Tompkins	4.15 pm
13	Greg Rzesniowiecki		4.30 pm
49	Ritchie Dahm		4.45 pm
21	Ngāti Mutunga	Paul Cummings?	5.00 pm
44	Friends of Waitara River	Andrea Moore	5.15 pm
Unconfirmed attending			

<b>Submission Number</b>	<b>Submitter</b>		
1	Physicians and Scientists for Global Responsibility	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
2	Kindergarten Taranaki	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
3	Mr James Tate	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
4.	Mr Paul Bishop	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
5.	Mr Ian Armstrong	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
6.	Taranaki Enviroschools	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
7.	Mr Malcolm Carswell	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
8.	Mr Peter Hodgkinson	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
9.	Ms Margaret Vickers	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
10.	NZ Farm Environment Trust	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
11.	Upcycle Taranaki Ltd	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
12.	Wild for Taranaki	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
13.	Greg Rzesniowiecki	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
14.	Fish and Game Taranaki Region	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
15.	Pamela Cordery	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
16.	Sport Taranaki	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
17.	Pauline Sutton	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
18.	Tama Blackburn	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
19.	Koromiko Kindergarten	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
20.	Taranaki Historic Cathedral Project	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
21.	Ngāti Mutunga	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
22.	Taranaki CDEM	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
23.	Tourism Industry Aotearoa	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
24.	Te Kaahui o Rauru	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
25.	Mr Nigel Carter	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
26.	Mr Nigel Williamson	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
27.	Mr Andrew Hooks	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
28.	New Plymouth Mountain Bikers Club	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
29.	Mr Adrian Lobb	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>



Ordinary Meeting to hear submissions on the 2018/2028 Long-Term Plan - List of Submission received (55)

<b>Submission Number</b>	<b>Submitter</b>		
30.	Mr Clive Neeson	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
31.	Venture Taranaki Trust	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
32.	Te Runanga o Ngāti Ruanui Trust	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
33.	Federated Farmers Taranaki	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
34.	Toimata Foundation	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
35.	Plastoil Recycling	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
36.	Forest Owners Association	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
37.	Climate Justice Taranaki Inc	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
38.	Sustainable Taranaki	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
39.	Mokau ki Runga Regional Management Committee	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
40.	Stratford Primary School	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
41.	Mr Matthew Jane	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
42.	Rotokare Scenic Reserve Trust	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
43.	Taranaki District Health Board	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
44.	Friends of Waitara River Inc	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
45.	Taranaki Energy Watch	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
46.	Taranaki Mounga	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
47.	NP Mountain Bikers Club	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
48.	Te Korowai o Ngaruahine Trust	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
49.	Mr Ritchie Dahm	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
50.	Te Kotahitanga o Te Atiawa	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
51.	Mrs Judith Hill	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
52.	Taranaki Stadium Trust	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
53.	Eltham/Kaponga Community Board	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
54.	Pukeiti Rhododendron Trust	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>
55.	Taranaki Regional Council	<a href="#">Link to Submission</a>	<a href="#">Link to Officer's Report</a>

# PSGR

## Physicians and Scientists for Global Responsibility

New Zealand Charitable Trust

Formerly Physicians and Scientists for Responsible Genetics New Zealand

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22 January 2018

To all New Zealand Councils and Councillors

cc District Health Boards and Public Health  
Public Health Services  
Other interested recipients

### **Formulating your Long Term Plans**

PSGR is a not-for-profit, non-aligned charitable trust whose members are mainly science, medical and machinery-of-government professionals. Since the Royal Commission on Genetic Modification made recommendations “to proceed with caution”, PSGR has maintained a watching brief, in particular on scientific developments in genetic engineering (also referred to as genetic modification), as well as other public interest issues involving health and environmental safety where we can offer expert opinion on lawful and authoritative public policy information.

Please consider this information and recommendations as a submission by PSGR to your planning development and consultation 2018. PSGR will speak to this submission.

### **In forming responsible and effective governance**

The responsibility to ratepayers and the wider community requires informed decision-making, including consideration of new information and peer-reviewed science that may challenge perceived wisdom, or current policy assumptions. In many situations an intergenerational perspective is required.

In this submission regarding your Long Term Plans we ask Council to consider the following issues to be addressed:

- Providing drinking water free of fluoridation;
- Protection against contamination of land and waterways by genetically engineered organisms;
- Urgent reduction of public, crop and animal exposure to glyphosate-based herbicides.

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Physicians and Scientists for Global Responsibility New Zealand

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Appropriate policy and planning responses to these issues are also provided in PSGR's recommendations at the end of each following section.

### 1. Drinking water free of added fluoride and associated bio-accumulative, toxic contaminants

We refer you to our letter recently sent to MPs, attached here for your convenience.

Further to that letter, a paper has just been accepted for publication concerning the cost-benefits of water fluoridation.<sup>i</sup> Unfortunately, the authors have made seriously flawed assumptions together with erroneous statements of fact. As an example, they claimed that fluoridation has resulted in a nationwide 40% reduction in decay and thus by extension, huge cost savings. This was an inappropriate extrapolation from an isolated cohort of deprived children mentioned in the 2009 Sapere Report that specifically stated that its findings should not be used to evaluate any fluoride benefits. The authors appeared to have ignored another and much more detailed paper.<sup>ii</sup>

In that more detailed paper, there are direct quotes from those involved in running fluoridation plants:

In 2010, amid a budget crisis, the City of Sacramento, CA, instructed all departments to review programmes and services. Mr Marty Hanneman, then Director of the Department of Utilities, wrote in a memo to the City Council:

*The City of Sacramento has been fluoridating its water supplies just over 10 years. Within that time, the actual cost of operating and maintaining the fluoridation systems has proven to be considerably more than the initial estimate. . . . The fluoridation infrastructure at the E A Fairbairn Water Treatment Plant is overdue for replacement and will be very expensive to replace . . . Fluoridating water is a very costly and labour intensive process and requires constant monitoring of fluoride concentrations to ensure proper dosages. . . . The chemical is very corrosive, so all equipment that is used in the fluoridation process has a very short life expectancy and needs to be replaced frequently. . . . but also causes frequent and complex systems failures.*

This was echoed by Mr René Fonseca of Carroll Boone Water District in Eureka Springs, AR, which was required by a 2011 State mandate to begin Community Water Fluoridation (CWF)<sup>iii</sup>:

*All of our chemical feed systems require regular maintenance which is routine, but fluoride feed equipment often requires replacement and more frequent attention. . . . I have toured plants and seen in trade publications deteriorating pipes, steel doors and casing, electrical components, etc. There are millions of dollars spent yearly on infrastructure damage caused by fluoride in our industry.*

The realities expressed in these two quotes are not the exceptions.

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A water plant manager in Alberta, Canada, complained that the fumes from the fluoride acid etched the glass, paint, and computer screens of the water treatment plant.

Seven years after CWF began in 2001, Riverton, Utah, spent nearly US\$1.2 million for two new buildings “to get fluoride out of electrical and pump area.”

The international evidence is that the installation and long-term maintenance of water fluoridation is very expensive on the rate-paying public. The rationale is highly questionable.

### **Recommendation**

PSGR recommends that Council does not fluoridate drinking water on the grounds that it is not lawful to put bio-accumulative toxins into people and the environment.

## **2. Genetic engineering**

We refer Council to our letter recently sent to New Zealand Members of Parliament and copied to Councils. This is attached for your convenience.

We refer particularly to Councils in Northland, Auckland, Bay of Plenty and Hawkes Bay that have worked to protect their ratepayers from the risks of releasing genetically engineered / modified organisms into the environment; and the risks to health, horticulture, agriculture and exports. See <http://www.wdc.govt.nz/PlansPoliciesandBylaws/Plans/Genetic-Engineering/Documents/GE-Poll/GE-Poll-Results-WDC.pdf>

Under the new Resource Legislation Amendment Act 2017 Councils retain the right to safeguard their region. Councils have responsibilities and powers under the Act that can add another important layer of protection.

Although there is a view among some councils that public policy on matters relating to genetic engineering can be safely left to New Zealand’s Environment Protection Authority (EPA) there is adequate evidence that shows that EPA’s oversight of these matters is biased to industry interests (through being partial and selective) and therefore does not give due weight to public and environmental safety issues – and therefore the public interest.

Therefore, EPA’s claimed policy on genetic engineering matters is arguably inconsistent with the purposes and intent of the Hazardous Substances and New Organisms Act 1996. Therefore, such Deficiency suggests that the EPA’s policy does not have any statutory authority in law – and cannot therefore be relied upon by councils in giving effect to their statutory obligations.

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## Recommendations

On this issue, PSGR recommends that Council gives weight to the findings of the Union of Concerned Scientists (UCS) on Food and Agriculture. On genetic engineering in agriculture the UCS found **that** the risks have been exaggerated, but so have its benefits and that we have better, more cost-effective options. You can find their reports on <http://www.ucsusa.org>.

PSGR also recommends that Council draws on the experience of Northland, Auckland, Bay of Plenty and Hawkes Bay Councils – i.e. concludes that the risks involved require responsible legislation to reflect the precautionary principle on any proposed release of a genetically engineered organism into the environment in Council's area of jurisdiction. Such a decision on the facts presently available will indicate to the public that Council exercises its statutory powers reasonably and in accordance with the factual and authoritative information presently available.

### 3. Use of glyphosate-based herbicides (GBH) – unconscionable on the facts

Despite New Zealand's Environmental Protection Authority rejecting a statement by the World Health Organisation's International Agency for Research on Cancer (IARC), that glyphosate is "possibly carcinogenic to humans" (category 2B), there is substantial scientific evidence supporting an IARC statement that glyphosate-based herbicides are a risk to the environment and to human health.

Glyphosate is the active ingredient in the glyphosate-based herbicide Roundup and many other brands of GBH herbicides. Once used, it is pervasive in the environment. Residues were recently found in samples of 45 percent of Europe's topsoils<sup>iv</sup> and in the urine of three quarters of German participants.<sup>v</sup> A previous study by the Heinrich Böll Foundation, in analysing glyphosate residue in urine, concluded that 75% of the target group displayed levels that were five times higher than the legal limit for drinking water, and one third of the population showed levels between ten and 42 times higher than what is normally permissible. Glyphosate has been detected in breast milk and in honey samples taken from sites around the world.

Although manufacturers and other advocates say there is no certainty of the biological significance in the presence of the herbicide in people, this is belied by the latest analysis of cancer risks, glyphosate's action as a registered antibiotic, and findings of its use in agriculture impacting emerging problems with bacteria resistant to antibiotics. See:  
<http://www.canterbury.ac.nz/news/2017/new-research-finds-common-herbicides-cause-antibiotic-resistant.html>.

Glyphosate can enter the body through food or drinking water. It can be inhaled through breathing in spray drift. Foraging animals and pets are equally exposed. Glyphosate can disrupt human cellular structure and function, and contribute to uncontrolled cell proliferation (a cancer-like characteristic). The changes brought about in human skin cells by GBH are consistent with the changes that are seen in hepatocellular carcinoma, lung cancer, colorectal cancer, and melanoma.

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Very low concentrations of glyphosate have been found to stimulate unhealthy cell growth, while higher concentrations suppressed cell growth. This indicates that the herbicide is a powerful disrupter of the endocrine system. Such disruptions can therefore potentially disrupt all normal human-body-life-processes. The greatest dangers may therefore be found in extremely low concentrations that are measured in parts per trillion, rather than in parts per million.

In one study, glyphosate residue was recorded in 99.6% of 2009 monitored participants.<sup>vi</sup> Significant values were found in children and adolescents. This study was the largest of its kind ever carried out.

### Links to additional information on glyphosate

- Public Health Concern: Why did the NZ EPA ignore the world authority on cancer? A report released by Jodie I Bruning, B.Bus.Agribusiness and Steffan Browning, MP <https://www.greens.org.nz/sites/default/files/NZ%20EPA%20Glyphosate%20and%20Cancer%202017.pdf>
- A Monograph on Glyphosate from the Pesticide Action Network Aotearoa New Zealand (PAN) <http://www.pananz.net/wp-content/uploads/2016/10/Glyphosate-monograph.pdf>  
<http://www.psgr.org.nz/glyphosate/viewdownload/10-glyphosate/36-glyphosate-pan-mongraph>
- Physicians and Scientists for Global Responsibility New Zealand Charitable Trust - Glyphosate <http://www.psgr.org.nz/glyphosate>  
<http://www.psgr.org.nz/glyphosate/viewdownload/10-glyphosate/16-glyphosate>  
<http://www.psgr.org.nz/glyphosate/viewdownload/10-glyphosate/25-glyphosate-calling-for-a-ban>
- The environmental impacts of glyphosate, Friends of the Earth Europe [https://www.foeeurope.org/sites/default/files/press\\_releases/foee\\_5\\_environmental\\_impacts\\_glyphosate.pdf](https://www.foeeurope.org/sites/default/files/press_releases/foee_5_environmental_impacts_glyphosate.pdf)

### Recommendations

PSGR recommends Council refrains from using glyphosate as an herbicide in all places accessible to animals and humans including waterways and where spray drift could pose a risk to people and could damage food crops. Less invasive methods are available.

We can supply further authoritative information on fluoride, genetic engineering and glyphosate-based herbicides if that would be helpful to Council.

Please consider this information and recommendations as a submission by PSGR to your planning development and consultation 2018.

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Physicians and Scientists for Global Responsibility New Zealand

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Jean Anderson  
For the Trustees of Physicians and Scientists for Global Responsibility New Zealand Charitable Trust

Paul G Butler, BSc, MSc, MB, ChB, Dip.Obst., FRNZCGP, General Practitioner, AUCKLAND

Jon Carapiet, BA(Hons), MPhil., Senior Market Researcher, AUCKLAND

Bernard J Conlon, MB, BCh, BAO, DCH, DRCOG, DGM, MRCGP (UK), FRNZCGP  
General Practitioner, ROTORUA

Elvira Dommissé BSc (Hons), PhD, Mus.B, LTCL, AIRMTNZ, Scientist, Crop & Food Research Institute  
(1985-1993), working on GE onion programme, CHRISTCHURCH

Michael E Godfrey, MBBS, FACAM, FACNEM, Director, Bay of Plenty Environmental Health Clinic,  
TAURANGA

Elizabeth Harris, MBChB, Dip Obs, CNZSM., CPCH, CNZFP; DMM, FRNZCGP, General Practitioner,  
KUROU

Frank Rowson, B.Vet.Med., retired veterinarian, MATAMATA

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Damian Wojcik, BSc, MBChB, Dip.Rel.Studies, Dip.Obst., DCH, FRNZCGP, FIBCMT (USA), FACNEM,  
M Forensic Medicine (Monash), FFCFM (RCPA), General Practitioner, Northland Environmental Health  
Clinic, WHANGAREI

Jean Anderson, Businesswoman retired, TAURANGA.

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<sup>i</sup> David Moore<sup>1</sup>, Matthew Poynton<sup>1</sup>, Jonathan M. Broadbent and W. Murray Thomson. The costs and benefits of water fluoridation in NZ  
BMC Oral Health (2017) 17:134 DOI 10.1186/s12903-017-0433-y

<sup>ii</sup> Lee Ko, Kathleen M. Thiessen. A critique of recent economic evaluations of community water fluoridation. International Journal of  
Occupational and Environmental Health 2015 Vol. 21 No.2

<sup>iii</sup> Fonseca, 2012, private communication

<sup>iv</sup> <http://www.pan-europe.info/sites/pan-europe.info/files/Glyphosate-published.pdf>

<sup>v</sup> <https://www.euractiv.com/section/agriculture-food/news/overwhelming-majority-of-germans-contaminated-by-glyphosate/>

<sup>vi</sup> <https://www.euractiv.com/section/agriculture-food/news/overwhelming-majority-of-germans-contaminated-by-glyphosate/>

# PSGR

## Physicians and Scientists for Global Responsibility

New Zealand Charitable Trust

Formerly Physicians and Scientists for Responsible Genetics New Zealand

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17 November 2017

To all Members of the New Zealand Parliament

cc All New Zealand Councillors; Members of  
Federated Farmers; Royal Forest and Bird  
Protection Society, and other relevant  
organisations

PSGR is a not-for-profit, non-aligned charitable trust whose members are science and medical professionals. Since the recommendations of the Royal Commission on Genetic Modification "to proceed with caution" PSGR has maintained a watching brief on the scientific developments in genetic engineering (also referred to as genetic modification).

### **Genetically engineered organisms**

This letter is to request that all Members of Parliament work cooperatively with all other Members of Parliament from across the political spectrum, in order to ensure a precautionary approach to the use of genetically engineered organisms. We ask this in the interest of protecting New Zealand's GE-free production and natural environment, and the economic advantage of a GE-free status for our export markets.

It is with concern that we again read proposals of using genetic engineering / modification technology outside of a laboratory. While New Zealand has worked soundly in this field in projects requiring the strictest confinement, there has been long-standing and strong academic and public opposition to approval of these novel organisms for release into any environment.

The basic problem inherent in all the discussion about genetic manipulation and gene editing (especially CRISPR) is that it is based on unscientifically naive exaggerations of what the technology actually achieves. Proponents talk about it being so precise and accurate and only making small changes that could have occurred as a result of ordinary germline mutations. This is fundamentally misleading. What they are talking about is the change which is targeted, but the targeted change is invariably accompanied by a very large number of other changes at similar sites in the DNA of the genome being altered. Although each of the changes may be small, genetic CRISPR is still a scattergun approach like earlier methods of genetic engineering. And the correlations between the sites affected by the scattergun are very likely to be of some genomic significance, which may eventually come to light at the population level after a long time. The effect of many changes are likely to remain undetectable using standard techniques of phenotyping because of their wide dispersal in the genome. Thus, genetic engineering and the recently acclaimed CRISPR are not much like the way enthusiasts describe them.



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Once again the problems with gene drive technologies arise because of the disconnect between the engineering plan and biological/ecological reality. There is so little that is really known about the long or short term effects of gene-drive deployment that, in our opinion, it would be utter foolishness to unleash it on the environment, especially something as delicate as our native ecology. It is as if Hahn and Meitner<sup>i</sup>, having discovered nuclear fission on the laboratory bench, told everyone to get busy designing and building a nuclear power plant.

Molecular biologists present inflated views of the worth of what they do in order to get research grants, start believing what they have said and then peddle it to the community as a way of justifying their funding. It all has to sound clever, smart, innovative, commercially viable, entrepreneurial and a solution to climate change, world hunger, antibiotic resistance, other medical problems, or ecological collapse. What is done is mostly scientifically and/or commercially speculative. Most of it does not work. The few magic bullets that are produced are dressed up so that their side effects are masked – like the herbicide, glyphosate - and sold as complete solutions that are actually partial.

All molecular biological explanations are couched in terms of accepted concepts like “gene” that are not only problematic philosophically but also practically. We still have very little idea how complete genomes work. It is important to understand much more than the relationship between the genes and the features of individual organisms. We need to know what the effects of changes are on entire populations many generations down the line. That is what ecology depends on. It is likely there are huge chunks of ‘junk DNA’ in the human genome, and in that of any other mammal, whose sudden loss would drive the species to extinction. None of that is ever considered in technological evaluations. As long as a proponent demonstrates the target effect and nothing else very evident, the world can be convinced that what is being done is safe and smart.

The main problem we are facing with biotechnology is that we are not, as a species, humble enough. Predictions of safety by proponents have been shown to be false, with short term monetary gain taking precedence over long term risks. We ask who, in ten years’ time, would be held accountable for environmental damage. We repeat, once released, genetically engineered organisms can self-replicate and contaminate wild species.

Recently, talk has again suggested applying the technology for uses that would expose genetically engineered organisms in the New Zealand environment that are capable of replicating. As has been seen overseas, once released the novel DNA is irretrievable, will spread, and has negative results.

The request for your support to a precautionary approach reflects:

- Evidence from two decades of commercial use of genetically engineered organisms overseas;
- Improvements in society's understanding of complex natural systems, and knowledge in epigenetics;
- The long term impacts from transgenic organisms;
- Success in developing effective non-GE solutions to issues society seeks to address.

PSGR urges caution be adopted by New Zealand's political leaders, in national and local government, for the regulation of such novel organisms outside of full containment.

To all Members of the New Zealand Parliament  
 Physicians and Scientist for Global Responsibility New Zealand

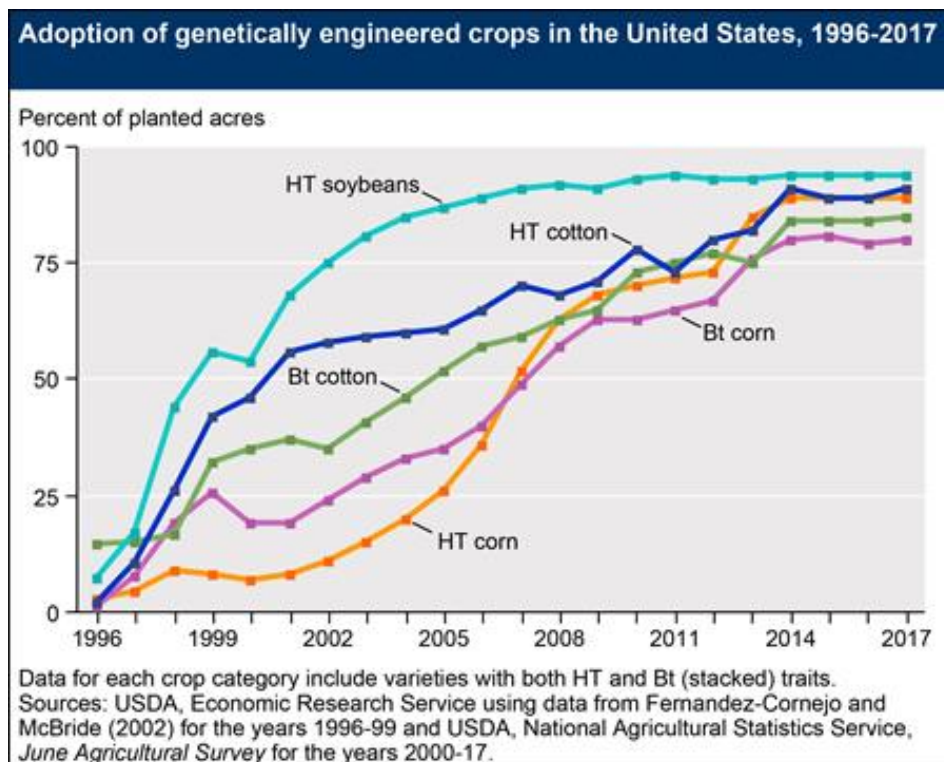
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Under current legislation there is no requirement for the Environmental Protection Authority (EPA) to apply the precautionary principle, or to require a bond, or to require proof of financial fitness from applicants. These are mechanisms that should encourage moderation of commercial risk-taking. This leaves New Zealand vulnerable to similar detrimental effects seen overseas, and at risk of repeating past mistakes on the scale of the destruction of 3000 genetically engineered sheep at Whakamaru in the Bay of Plenty.

This 2002 event resulted from the clinical failure of products outlined in Application Code GMF98001 made to the Environmental Risk Management Authority (ERMA), now the EPA, and the collapse of the overseas investment company running the experiment, leaving no funds for scientific bio-security tests or remediation at the site. At that time, ERMA admitted there was no monitoring at the Whakamaru farm and no recommendations in place for on-site monitoring. Requests from a range of interested parties for scientific analysis of the carcasses for future scientific benefit were denied.<sup>ii</sup>

Contradicting the need for precaution regarding genetically engineered organisms, there are calls from some commercial interests seeking to 'relax' rules, to reduce the EPA's oversight of experimental genetic engineering techniques. These calls are effectively encouraging the transfer of risk to the wider community and 'New Zealand Inc.' in order to advance interests in commercialising transgenic organisms, and leveraging Intellectual Property (IP) for their financial gain.

The US is the largest producer of transgenic crops; herbicide tolerant and *Bacillus thuringiensis* (Bt). Since mass commercialisation two decades ago, adoption has grown dramatically as can be seen from this graph produced by the Economic Research Service of the US Department of Agriculture.<sup>iii</sup>



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Recent reports show US farmers are abandoning transgenic crops because of poor monetary returns. A media report says: "Bold yellow signs from global trader Bunge Ltd are posted at US grain elevators barring 19 varieties of GMO corn and soybeans that lack approval in important markets."<sup>iv</sup>

A closer-to-home study will show how planting transgenic canola in Tasmania led to disaster with volunteer seedlings appearing many years after the cessation of plantings. The Moratorium that resulted was made indefinite in 2014 to protect its clean, green brand.<sup>v vi</sup>

The evidence overseas from commercial release of such novel organisms also includes:

- Increased use of toxic chemicals in agriculture<sup>vii</sup>;
- Disruption of complex natural systems;
- Changes in gut flora in animals and humans consuming genetically engineered foods;
- Increased incidence of tumour development shown in long-term feeding studies;
- Genetic instability and unexpected effects from the processes of genetic engineering;
- Contamination in the field, including by experimental and unauthorised test-crops emerging years after field-trials, even hundreds of miles away from the trial site, a result of horizontal gene transfer;
- Extensive spread of weeds that have become resistant to genetically engineered DNA sequences as a result of in-field horizontal gene transfer<sup>viii</sup>;
- A new generation of transgenic crops being engineered to resist even more toxic chemicals such as 2,4-D responding to the growing failure of herbicides such as glyphosate, the active ingredient in Roundup used on Roundup Ready transgenic food crops;
- The potential for unexpected effects impacting gene expression in future generations.

These and other issues have raised local and international concern in scientific and civil-society communities. The transfer of risk that commercial release of transgenic organisms involves is indicated by the fact the insurance industry refuses cover for the potential damage of these organisms occurring, whether quickly, or slowly, or over an extended term.

Drawing on scientific, legal and other expertise, some New Zealand councils used the then standing Resource Management Act to consider in their Plans their responsibilities regarding precaution around genetically engineered organisms in the environment and on long-term land use. This process is ongoing with more Councils examining what steps they can take to protect their region.

Challenged in the Environment Court, these measures stand. They include a local level of oversight of transgenic organisms such as requiring bonds from commercial users of genetically engineered organisms to mitigate exposure of costs to ratepayers under 'socialised risk'. The measures respond to community and scientific concerns and may also help regional development for producers of safe, clean, premium-quality, GE-free foods for local and export markets; many of the latter demand 'GE Free' produce. In depth research showed Councils they needed to think long-term and for future generations, especially as the EPA loses jurisdiction at the point of approving a commercial release of a genetically engineered organism.

Federated Farmers have recently withdrawn their challenge to Northland Environment Court decisions giving Councils the right to oversight.

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Thank you in advance for reading the information we have provided and for working with other Members of Parliament irrespective of political affiliation and responsibilities. Working together to ensure precaution in legislation is vital in responding to the proven risks from existing and new experimental techniques in the development of genetically engineered organisms.

Whatever your party's official stand on the transgenic debate, we urge you personally to recognise and support the need for precaution, and look forward to hearing from you

For further reference, we recommend the following:

- Genetic Engineering and New Zealand, PSGR, released May 2017  
<http://www.psgr.org.nz/glyphosate/viewdownload/10-glyphosate/39-2017-genetic-engineering-and-new-zealand-9-may-2017>
- 'An Overview of Genetic Modification in New Zealand, 1973–2013: The first forty years', a review of genetic engineering research in New Zealand by the independent McGuinness Institute, Wellington. It recommended that a moratorium on commercial transgenic release be instigated.  
<http://mcguinnessinstitute.org/includes/download.aspx?ID=130247>
- Public Health Concern: Why did the NZ EPA ignore the world authority on cancer? A report released by Jodie I Bruning, B.Bus.Agribusines and Steffan Browning, MP  
<https://www.green.s.org.nz/sites/default/files/NZ%20EPA%20Glyphosate%20and%20Cancer%202017.pdf>
- A Monograph on Glyphosate from the Pesticide Action Network Aotearoa New Zealand (PAN)  
<http://www.pananz.net/wp-content/uploads/2016/10/Glyphosate-monograph.pdf>  
<http://www.psgr.org.nz/glyphosate/viewdownload/10-glyphosate/36-glyphosate-pan-mongraph>
- Physicians and Scientists for Global Responsibility New Zealand Charitable Trust - Glyphosate  
<http://www.psgr.org.nz/glyphosate>  
<http://www.psgr.org.nz/glyphosate/viewdownload/10-glyphosate/16-glyphosate>  
<http://www.psgr.org.nz/glyphosate/viewdownload/10-glyphosate/25-glyphosate-calling-for-a-ban>

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(1985-1993), working on GE onion programme, CHRISTCHURCH

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Frank Rowson, B.Vet.Med., retired veterinarian, MATAMATA

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Damian Wojcik, BSc, MBChB, Dip.Rel.Studies, Dip.Obst., DCH, FRNZCGP, FIBCMT (USA), FACNEM, M  
Forensic Medicine (Monash), FFCFM (RCPA), General Practitioner, Northland Environmental Health Clinic,  
WHANGAREI

Jean Anderson, Businesswoman retired, TAURANGA.

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<sup>i</sup> In 1938, physicists Lise Meitner and Otto Frisch made a discovery that could lead to the atomic bomb; that a uranium nucleus had split in two.  
<sup>ii</sup> [http://www.parliament.nz/en-nz/pb/business/qa/47HansQ\\_20040518\\_00000758/12-transgenic-sheep%E2%80%94environment-whakamaru-farm](http://www.parliament.nz/en-nz/pb/business/qa/47HansQ_20040518_00000758/12-transgenic-sheep%E2%80%94environment-whakamaru-farm).

<sup>iii</sup> <https://www.ers.usda.gov/data-products/adoption-of-genetically-engineered-crops-in-the-us/recent-trends-in-ge-adoption.aspx>

<sup>iv</sup> US traders reject GMO crops that lack global approval, 7 May 2016, [www.reuters.com/article/us-usa-gmo-crops-idUSKCN0XX2AV](http://www.reuters.com/article/us-usa-gmo-crops-idUSKCN0XX2AV)

<sup>v</sup> 10 January 2014 <http://www.abc.net.au/news/2014-01-09/tasmania-27s-gmo-ban-extended-indefinitely/5192112>

<sup>vi</sup> Audit Report May 2014 Former Genetically Modified Canola Trials sites <http://dppwe.tas.gov.au/Documents/GM%20Canola%20Former%20Trial%20Sites%20Audit%20Report%20May2014.pdf>

<sup>vii</sup> "Herbicide-resistant crop technology has led to a 239 million kilogram (527 million pound) increase in herbicide use in the United States between 1996 and 2011" <https://enveurope.springeropen.com/articles/10.1186/2190-4715-24-24>

<sup>viii</sup> Environ Sci Eur. 2017; 29(1): 5. 2017 Jan 21. doi: 10.1186/s12302-016-0100-y PMCID: PMC5250645 Herbicide resistance and biodiversity: agronomic and environmental aspects of genetically modified herbicide-resistant plants  
Gesine Schütte <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5250645/>

# PSGR

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16 November 2017

To all Members of the New Zealand Parliament

cc to other relevant parties

### **For the sake of a tooth**

Michael E Godfrey MBBS, FACAM, FACNEM,  
Director, Bay of Plenty Environmental Health Clinic, TAURANGA

This letter is to request that all Members of Parliament work cooperatively with all other Members of Parliament from across the political spectrum, to ensure a safe and proper approach to the use of fluoride. We ask this in the interest of protecting New Zealanders.

### **The Science has changed**

An important study published this year in the journal *Environmental Health Perspectives* by a team of investigators at the Universities of Toronto, McGill, and the Harvard School of Public Health, has found a significant association between fluoride exposure in pregnancy and lower measures of intelligence in children [1]. The US National Institute for Health funded this US\$3 million study to specifically investigate developmental neurotoxicity.

The study is the first by the U.S. Government in 60 years into potential adverse neurological effects. It adds to the published evidence indicating widespread adverse effects from fluoride involving all stages in life from pre-birth to old age. They include, amongst other effects, confirmed neurological impairment including: loss of IQ; hypothyroidism; musculo-skeletal fluorosis diagnosed as arthritis; and dental fluorosis. This element is present due to an unlimited consumption of fluoridated water; in toothpaste; in tea; in pharmaceuticals; and in the commercial food chain.

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### **Historical Fact**

The premise of a fluoride dental benefit was based on an inadequately researched hypothesis in the 1940s that was enthusiastically endorsed by American commercial and political interests with a need to sanitise a toxic industrial waste product from the atomic, aluminium and fertiliser industries. The sugar industry also directly lobbied to support fluoridation. However, subsequent dental research involving a total that exceeded 200,000 children from the USA (1990) Australia (1996-2013) and now in New Zealand (released in March 2017) has confirmed at best a reduction of one filling per child [2].

### **Dental Decay**

Dental decay is totally due to excessive sugar consumption and nutrient deficiencies. Notably, the Maori population on their ancestral diets had no dental decay. This changed to 40 percent within a generation of adopting foods based on sugar and white flour. No amount of fluoride will change this whilst Coca-Cola remain cheaper than milk.

The latest Medsafe (December 2014) Guidance document for labelling of fluoride tablets renders the uncontrolled availability of fluoridated water at up to 1mg/L and even toothpaste at significant variance with Medsafe limits that specifically included these instructions [5]:

1. Do not use in children under 6 years of age
- 1.2. Do not use in pregnancy

The Dental Association's fluoride promotion ignores this important medical directive.

### **Adverse neurological effect of fluoride**

The findings of this latest study have major implications in that an increase in urine fluoride of 1 mg/L was associated with a significant drop in IQ of 5 to 6 points. To put this into perspective the Mexican women subjects had urine fluoride between 0.5 and 1.5 mg/L with an average of 0.9 mg/L. Loss of IQ in the children was found over this entire range of mother's urine fluoride when the children were tested at age 4. A study presented in 2015, reported that the mean urinary fluoride concentration was 0.82 mg/L amongst 55 pregnant women residing in the fluoridated community of Palmerston North [3]. Thus, mean daily urinary excretion in pregnant women in a fluoridated community in NZ appears to be virtually the same. The range of fluoride exposures is likely to be well within the range in fluoridated New Zealand and thus directly applicable to areas with artificial fluoridation.

A study by Broadbent (2015) reportedly found no association between fluoridated water and IQ [4]. However, unlike the Mexican research, this observational study did not quantify exposure using established biomonitoring matrices such as urinary or plasma fluoride levels. Neither did this study investigate prenatal exposure and this could be critical.

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### **Potential inverse cost benefits**

The Ministry for Health (MoH) has yet to properly balance the cost-saving of a tooth against the potential adverse health effects. Whilst a reduction in IQ of this magnitude could logically contribute to socioeconomic inequalities and a decreased quality of life, the evidence for musculo-skeletal fluoride effects or arthritis cost this country over \$3 billion in 2010 [6,7]. Fluoride induced hypothyroidism has also been identified [8] with subsequent increased incidences of obesity and diabetes that are also an ever-increasing costly social problem.

The Republic of Ireland (RoI), with a similar population to NZ as well as similar soft water, has had mandatory water fluoridation for 50 years. Despite this dental decay rates are still high. The RoI has double the rate of diabetes of unfluoridated Northern Ireland. The prevalence of diabetes is equally high in the USA, Australia, NZ and Singapore all with extensive water fluoridation. The annual financial burden of treating diabetes alone in the RoI has been estimated at over 10 percent of the health budget or Euros 1.4 billion [9] and NZ is no different.

Over the past 60 years the population has been increasingly exposed to fluoride, mainly sourced from industrial wastes, yet paradoxically no public health biomonitoring has been undertaken. Any cost-benefit of artificial fluoridation with potentially a minimal one tooth saved per child needs to be compared with the international evidence of widespread and increasing chronic illnesses in every country with an artificial fluoridation policy.

### **Conclusion**

This latest study importantly replicated previous research [10] by identifying that ingesting fluoride at levels essentially identical to those found in New Zealand mothers, resulted in neurological impairment in their offspring. Any risk of this is obviously unacceptable and potentially preventable if the Medsafe guidelines were implemented.

The accumulating body burden of fluoride is associated with multi-system debilitating illnesses.

The deliberate fluoridation of municipal water supplies appears to be unscientific, inappropriate, ineffective, and a significant health cost to the nation.

Dental decay, diabetes and obesity are all caused by excessive sugar intake.

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## References

- 1 Bashash M, Thomas D, Hu H, et al. 2017. Prenatal Fluoride Exposure and Cognitive Outcomes in Children at 4 and 6–12 Years of Age in Mexico. *Environmental Health Perspectives*. 2017 Sept. 19th.
- 2 <http://www.health.govt.nz/nz-health-statistics/health-statistics-and-data-sets/oral-health-data-and-stats/age-5-and-year-8-oral-health-data-community-oral-health-service>
- 3 Brough L, Jin Y, Coad J, Weber JL et al. Fluoride intakes in pregnant women in Palmerston North, New Zealand Joint Annual Scientific Meeting of the Nutrition Society of NZ and the Nutrition Society of Australia Dec 2015
- 4 Broadbent JM, Thomson WM, Ramrakha S, Moffitt TE et al. *Am J Public Health*. 2015 January; 105(1): 72–76. Published online 2015 January. doi: 10.2105/AJPH.2013.301857
- 5 <http://www.medsafe.govt.nz/regulatory/labelling.asp> (accessed January 2017)
- 6 Report by Access Economics Pty Limited for: Arthritis New Zealand. The economic cost of Arthritis in New Zealand in 2010. Available online: <http://www.arthritis.org.nz/wpcontent/uploads/2011/07/economic-costof-arthritis-in-new-zealand-finalprint.pdf> (accessed on 14 March 2016).
- 7 Waugh TD, Godfrey ME, Limeback H and Potter W. Black tea source, production and consumption: Assessment of health risks of fluoride intake in New Zealand. *J. Environ. and Public Health* June 2017. <http://doi.org/10.1155/2017/5120504>
- 8 Peckham S, Lowery D, Spencer S. *J Epidemiol Community Health* Published Online First: doi:10.1136/jech-2014-204971
- 9 Nolan JJ, O'Halloran D, McKenna TJ, Firth R and Richmond S. The cost of treating type 2 diabetes (CODEIRE). *Ir Med J*. 2006;99(10):307-310
10. Grandjean P and Landrigan PJ Neurobehavioural effects of developmental toxicity. *Lancet Neurol* 2014; 13: 330–38

## Joe Mack

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**From:** Lizzy Brouwers <lizzy.brouwers@kindergartentaranaki.co.nz>  
**Sent:** Monday, 5 March 2018 10:29 PM  
**To:** info  
**Cc:** Lauree Jones  
**Subject:** Long-term Plan for the Enviroschool Submission

Nga mihi,

To who this may concern, as the Enviroschool facilitator for Kindergarten Taranaki, I would like to support the council's proposal to fund a regional position for Enviroschools in Taranaki.

I have been working as a facilitator since 2012 and have been totally supported by Lauree Jones, who currently works for Toimata and facilitates to local primary schools in our region.

Lauree has a passion and natural affinity for this job. Both she and I complement each other in the delivery of the Enviroschool Kaupapa. Lauree supports me in the professional development delivery to our Cluster. So consequently we have 8 new kindergartens who have been sent their agreements this year! Working with Early childhood teachers provides an open pathway of knowledge in children's transition to school. Consequently it is crucial that Lauree's work in primary and mine in early childhood continue to grow and support the up and coming generations who are thinking and acting sustainably. If

anyone was to be considered to fund a regional positional for Enviroschools, I sincerely recommend Lauree Jones for this position.

Nga mihi,

Lizzy Brouwers  
Kahikatea Kindergarten  
Enviroschool Facilitator ~ Kindergarten Taranaki.

**Joe Mack**

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**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Tuesday, 6 March 2018 9:53 AM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

James

**Surname**

Tate

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27 Atkinson Rd, Hurworth 4371

**Phone (daytime)**

027 385 2622

**Mobile**

027 385 2622

**Email address**

mrjamestatenz@hotmail.com

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

Great opportunity and vision for the region.

**Other proposed changes**

**Comment**

**Additional comments**

**Additional comments explanation**

**Comment**

- Document 1**
- Document 2**
- Document 3**
- Document 4**

## Joe Mack

---

**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Thursday, 8 March 2018 5:07 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

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**Surname**

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Self

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**Email address**

Paul.Bishop@hotmail.com

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

I think this is a great idea. In future we could even make more trails on the paper roads around the coast of Taranaki. It would be great for locals and tourists.

**Other proposed changes**

**Comment**

**Additional comments**

**Additional comments explanation**

**Comment**

**Document 1**

**Document 2**

**Document 3**

**Document 4**

## **Submission to the Taranaki Regional Council in relation to the 2018-2028 Long Term Plan**

In collaboration with Sport Taranaki I wish to submit to the Council's 2018-2028 Long Term Plan.

In 2007 a Regional Walkways and Cycleways Strategy was developed for Taranaki. The vision of this document was "to provide transport choice and opportunities for people to discover and enjoy Taranaki's unique environment through walking and cycling". Objective 5 of the strategy was "To promote integration, co-ordination and consultation amongst strategy, planning and implementation agencies involved in walking and cycling in Taranaki". The Tapuae Roa project goes some way to addressing the above vision as does the proposed Pukeiti to Oakura trail. Both of which I commend. However I believe the intent of the 2007 Walkways and Cycleways Strategy is currently far from being met.

In November 2017 Sport Taranaki called a meeting of the four Taranaki Councils to discuss an integrated tracks and trails strategy for Taranaki. This meeting was held on November 28<sup>th</sup> 2017. The purpose of this was to ask the four Taranaki councils to work towards a common strategy utilising existing and planned tracks and trails with the intent of linking some of them in the future.

Since November 28<sup>th</sup> Lincoln University, funded by the Walking Access Commission Aotearoa, has carried out preliminary studies of current and planned tracks and trails infrastructure to develop a comprehensive and cohesive map of the region and develop an overall rational or Kaupapa to underpin the building and future development for the whole of the Taranaki region. It's important that current plans and those that are being developed for the near future are linked to the work being done now by the walking Access Commission Aotearoa.

A public petition has also been initiated supporting the four Taranaki Councils working together to formulate the integrated strategy and to move on this in a timely manner.

Together with Sport Taranaki at the 2018-2018 Long Term Plan Public Hearings the Public Petition will be presented and spoken to.

Ian Armstrong



**Joe Mack**

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**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Thursday, 15 March 2018 4:50 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mrs

**If other, please specify**

**First name**

Lauree

**Surname**

Jones

**Organisation (if applicable)**

Taranaki EnviroSchools

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**Phone (daytime)**

022 014 7462

**Mobile**

022 014 7462

**Email address**

lauree.jones@enviroschools.org.nz

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

**Other proposed changes**

**Comment**

I support the deepening of relationships with tangata whenua by TRC both within & outside its walls. I agree that more can be done around our waterways plus I strongly agree that supporting the

Enviroschools kaupapa in this region would be great for both TRC and Taranaki Enviroschools. It would support the potential for wider reach as well as layering the environmental, cultural & social education opportunities for Taranaki schools & their communities. It is also complimentary to the educational workshops TRC currently provides. The difference being that Enviroschools is a holistic long term journey for early childhood centres through to secondary.

**Additional comments**

**Additional comments explanation**

**Comment**

**Document 1**

**Document 2**

**Document 3**

**Document 4**

**Joe Mack**

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**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Thursday, 15 March 2018 10:48 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028  
**Attachments:** Submission-NPDC-plann-2018.docx

**Title**

Mr

**If other, please specify**

**First name**

Malcolm

**Surname**

Carswell

**Organisation (if applicable)**

1962

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173 Phenev Road  
RD4  
New Plymouth 4374

**Phone (daytime)**

06 7510396

**Mobile**

210602700

**Email address**

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

No

**Comment**

To much money for amount of people that would use it

**Other proposed changes**

**Comment**

**Additional comments**

**Additional comments explanation**

**Comment**

Continuation of boulder dumping for erosion protection of cliff face on Onaero Beach

**Document 1**

Submission-NPDC-plann-2018.docx - [Download File](#)

**Document 2**

**Document 3**

**Document 4**

15-03-2018

Submission for NPDC Long Term Plan 2018

Continuation of Coastal Erosion Sea wall on Onaero Beach

Please acknowledge my submission for the Long-term plan to include the continuation of the boulder positioning along the cliff base of the Onaero beach.

The work was started as emergency protection and has proven to be of good success but must be continued to prevent further erosion of council land and private homes.

It must also be noted the importance as a health and safety aspect to public using the beach as overhanging trees and cliff threaten and will continue to threaten falling on to the beach.

There has been plenty of reports and documentation backing the fact that the erosion is a real threat, and as a property owner I have seen the problem escalating in the past three or more years.

Please crack on with it before a property is lost or someone is killed.

Yours sincerely

Malcolm Carswell

## Joe Mack

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**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Monday, 19 March 2018 12:26 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

Peter

**Surname**

Hodkinson

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59 Dorset Ave, Westown, NP, 4310

**Phone (daytime)**

02041407583

**Mobile**

**Email address**

peter.hodkinson@outlook.com

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

**Other proposed changes**

**Comment**

I question Enviroschools without a dedicated recycling centre in place. Currently, paying for e-waste and a lack of a recycling centre (amongst other unnamed issues) negates any benefit brought by Enviroschools. A hollistic approach including an assessment of recycling should be undertaken by the council.

**Additional comments**

**Additional comments explanation**

**Comment**

Omitted from the plan is any sort of contingency plan or due diligence regarding the reliance this region has on the two big industries of Dairy and Oil/Gas.

Should a disruptive technology hit either of these industries (e.g. energy storage such as Tesla batteries), the region would take a sharp negative economic turn. I expect the council to consider and have a long term plan in place for the benefit of the people regarding this.

**Document 1**

**Document 2**

**Document 3**

**Document 4**

## Joe Mack

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**From:** Robin Vickers <r.m.vickers@xtra.co.nz>  
**Sent:** Wednesday, 14 March 2018 5:31 PM  
**To:** Media - Taranaki Regional Council  
**Subject:** Re: Talking Taranaki - March 2018

Hi there, you say to let you know what I think. Well here I go. My parents in-law were members of Pukeiti so I have knowledge of Rhododendrons azaleas etc. Plus my garden has also been part of the garden Festival, or as it was know back then the Rhododendron Festival. I also know how the original garden and entrance way used to look. Pukeiti is a beautiful part of Taranaki's garden heritage. BUT on my last visit I was very disappointed that we no longer have a beautiful lawn surrounded by perennial borders that in summer were a magnificent site. Where have all those beautiful perennials gone? I love the new dining area but question the necessity for all that steel structure? An over kill in my view. There seems to be a loss of focus on garden which is a shame. I am hoping that the proposed link with cycle track does not also steel from the natural beauty of this garden. In my view it is an awful lot a rate payers money being spent on so few. Bring back the true garden that Pukeiti was, a place for the whole family to enjoy. You are loosing sight that it should be a Garden of Interest not a recreation area for cyclists etc to wiz through. This was the general feeling of those that were in my group when we last visited. I feel there needs to be far more consultation and input from the public who are providing the money for such improvements.  
Regards. Margaret Vickers  
Sent from my iPad

On 14/03/2018, at 10:39 am, Taranaki Regional Council <[media@trc.govt.nz](mailto:media@trc.govt.nz)> wrote:

[View this email in your browser](#)



Taranaki Regional Council newsletter - March 2018

Chairman's chat

Let us know what you think





PO Box 36071  
Merivale  
CHRISTCHURCH 8146  
[www.nzfeatrust.org.nz](http://www.nzfeatrust.org.nz)

2018/2028 Long-Term Plan Submission  
Chief Executive  
Taranaki Regional Council  
Private Bag 713  
STRATFORD 4352

20 March 2018

Dear Sir/Madam

**Working in partnership to promote sustainable farming and growing**

Thank you for the opportunity to submit on the Taranaki Regional Council Long-Term Plan 2018-28.

The New Zealand Farm Environment Trust is a charitable organisation that was established in 2000 to promote sustainable farming and growing. The Trust is funded by our primary sector partners and through the generous support of regional councils including Taranaki Regional Council.

Our flagship activity is the Ballance Farm Environment Awards. Through the awards programme, farmers and growers gain independent feedback which they use to improve the sustainability of their business. We also find that entrants feel strongly about the need to share knowledge and positive stories about farming and growing with others. In many cases, entrants have gone on to important leadership roles in which they have championed sustainable farming.

One of the strengths of the awards programme is that it is managed regionally by a group of locals passionate about sustainable farming. The Trust's role is to help provide co-ordination and to be a point of contact with national partners.

The Trust is keen to maintain and enhance its partnership with the regional council. We see a number of exciting opportunities to compliment the role of the regional council to promote sustainable farming and growing practices.

On behalf of the Trustees and the local awards committee, I would like to thank you for your ongoing support. We look forward to continuing to work in partnership with the regional council to meet community outcomes.

Yours sincerely

A handwritten signature in black ink, appearing to read "James Ryan".

James Ryan  
**General Manager**  
Phone 027 324 5517  
[James.Ryan@nzfeatrust.org.nz](mailto:James.Ryan@nzfeatrust.org.nz)

**Joe Mack**

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**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Tuesday, 20 March 2018 4:20 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

Stephen

**Surname**

Bates

**Organisation (if applicable)**

Upcycle Taranaki Limited

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0274489998

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stevefromnaki@gmail.com

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

Yes, this upfront cost will be "paid for" by preserving our native flora and fauna. Prevention is better than cure!

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

No

**Comment**

Money better spent elsewhere.

**Other proposed changes**

**Comment**

My main purpose of filling in this submission was to advocate for Enviroschools. They do an amazing job and are the only national enviroschool who need to seek their own funding outside of Regional Councils. They can be much more efficient at doing their roles and education young to live sustainably if they were less concerned about sourcing funding every year. It is also a great look for the TRC to be involved in such a great organisation.

**Additional comments**

**Additional comments explanation**

**Comment**

Enviroschools all the way (read above)

**Document 1**

**Document 2**

**Document 3**

**Document 4**

27 March 2018

2018/2028 Long-Term Plan Submission  
Chief Executive  
Taranaki Regional Council  
Private Bag 713  
STRATFORD 4352



Dear Basil

**Submission on the Taranaki Regional Council 2018/2028 Long Term Plan Consultation Document.**

1. The Taranaki Biodiversity Trust, "Wild for Taranaki" (the Trust) thanks the Taranaki Regional Council (the Council) for the opportunity to make a submission on the *Taranaki Regional Council 2018/2028 Long-Term Plan – Consultation Document*.
2. The Trust supports the work being proposed for predator control and agrees with the Council's implementation of the first three years of a region-wide predator control programme around Mt Taranaki, focusing on the Waiwhakaiho catchment, and trialing possum eradication.

The implementation of a region-wide predator control programme fully aligns with the Trusts Restore Taranaki Initiative. The four objectives being to:

- Engage the Taranaki Community to take Action
  - Restore the Sound and Movement of Our Taranaki Wildlife (*through predator control*)
  - Restore the Cloak of Taranaki (*through native planting*)
  - Restore the Fresh Water of Taranaki
3. Wild for Taranaki has been working hard on and is currently in the final implementation stage of the 'Restore Taranaki' Initiative, a considerable amount of work with the support of the Council has already been undertaken with the finalisation of a Revenue Generation Strategy, Communications Strategy and creation of a website.

Wild for Taranaki's members (of which the Council is a member) are currently undertaking a variety of biodiversity projects within the region, including regional education (Enviroschools), translocation of native birds back into the region (kōkako), and intensive predator control within specific land areas (East Taranaki Environment Trust and Tiaki Te Mauri O Parininihi Trust).

5. Wild for Taranaki acknowledges and appreciates the key funding support that the Council has provided in support of the biodiversity projects that Wild for Taranaki and our members are undertaking within the region.
6. The Trust wishes to request additional funding support of \$70,000 per annum to continue to support biodiversity outcomes in the region as we launch the Restore Taranaki Initiative. The Trust



is working to secure additional funding support by 2028 for the implementation of the revenue generation strategy.

7. The additional funding is sought to employ an additional part-time person in order to progress the Trust aims.

**Conclusion**

8. The Trust once again thanks the Council for the opportunity to submit on the *Taranaki Regional Council Long Term Plan Consultation Document*.
9. The Trust requests that the matter raised in this submission be considered during the next phase of the Draft Long-Term Plan review process.
10. Should you have any queries on the matters raised in the submission please do not hesitate to contact the undersigned.
11. Officers of Wild for Taranaki are happy to further explore any matter raised above, with staff of the Council.
12. Wild for Taranaki would like to be heard in support of this submission.

Yours faithfully



Kirstin Foley  
*Operations Manager*  
*Wild for Taranaki*

27 March 2018

Greg Rzesniowiecki

[gregfullmoon013@gmail.com](mailto:gregfullmoon013@gmail.com)

**To: All NZ Territorial Authorities and Regional Councils**

**Subject: For consideration in your 2018 Annual Plan and/or Long Term Plan**

**Greetings Mayor, Councillors and Staff,**

We write as engaged citizens in the New Zealand democracy. Previously in 2014 we wrote to you concerning the [Trans Pacific Partnership \(TPP\) on behalf of the Motueka Renewables](#) where we proposed the [TPP Policy Solution](#). Arising from that a number of Councils engaged with the TPP matter and ultimately 12 Councils adopted the offered policy, many more noted and maintained a watching brief on the negotiations. Presentations were made to over 30 Councils some receiving presentations in multiple forums; workshop, committee and council.

It is fair to say a few councils stated that TPP is not a council matter, however most took an active interest and thanked us for bringing it to their attention.

In the later part of 2015 LGNZ (Local Government NZ) undertook an assessment on behalf of constituents. The resultant report concluded there were some risks to local government interests and some were down the track.

We suggest that trade negotiations are of critical importance to all New Zealanders given the [constitutional implications which alter the legal balance between human and property interests and rights](#).

The TPP has been through a tumultuous process, agreed and signed 4 February 2016, then Trumped January 2017. Since then the remaining 11 nations have negotiated a new agreement signed 8 March 2018 in Chile called Comprehensive and Progressive Agreement on the Trans Pacific Partnership (CPTPP). It is substantially the same agreement with 22 suspended provisions pending the return of the United States (US). Civil Society maintain our concern believing that the entrenchment and extension of property rights for foreign corporations will make it difficult for the NZ Government to ensure the wellbeing of all inhabitants.

All councils will now appreciate the public concern for clean rivers, quality potable water and indignation at allocations from aquifers for bottled water exporters. Whatever your council's attitude, it is acknowledged by Trade Minister Parker that CPTPP would disallow a tax on exported water as it is deemed discriminatory under the CPTPP regime.

With regard to [Air NZ – Shane Jones public spat regarding regional air services](#) - the State Owned Enterprises (SOE) [Chapter 17 of CPTPP, highlights the government must ensure that Air NZ operates on a purely commercial basis](#) when delivering domestic services unless it has issued a public mandate for it to do otherwise. It's great that [regional Mayors are proactive on behalf of their regions and provincial cities. Parliament is displaying bipartisan support for Jones' stance.](#) There's no way the NZ Government has anticipated every angle before locking NZ into CPTPP.

The attached paper also deals with the unfolding Facebook Cambridge Analytics election hacking scandal which demonstrates the dilemma of losing control of one's personal data – the CPTPP E-Commerce Chapter guarantees that the NZ Government will be powerless to prevent misuse of data as NZ will not have any legal right to demand that data is retained in NZ.

CPTPP imposes many constraints on NZ governance, entrenches corporation rights (ISDS) and leaves NZ exposed to whatever amendments are negotiated upon the return of the US which appears likely given statements from their corporate sector.

**LGNZ Conference** this year is in [Christchurch from 15-17 July 2018](#).

The 2018 conference theme is;

**We are firmly focused on the future: Future-proofing for a prosperous and vibrant New Zealand.** There will be a strong focus on leadership and addressing the big challenges and opportunities facing New Zealand and its communities.

Question to LGNZ - **How does TPP/CPTPP future proof NZ?**

We wish you well in your deliberations.

Please consider the attached evidence paper and recommendations for your 2018 Annual Plan and Long Term Planning processes.

**We offer four specific recommendations** (detail in the attached paper);

**Recommendation #1** (page 13 attachment)

We suggest that the Council considers formally supporting the 23 principles offered by Alfred de Zayas in his [paper to the UNHRC \(A/HRC/37/63\)](#) in which he "highlights the urgent need to apply human rights principles systematically and uniformly to all entities and endeavours."

De Zayas states "What we see is a financial system rigged in favour of powerful individuals and corporations, unequal participation in governments and international organisations, and communities suffering from a reduction of social services, imposed austerity, privatization of public utilities, the misplaced priorities of political leaders and a general absence of genuine representation," - UN Human Rights High Commission [press release](#)

**Recommendation #2** (page 20 attachment)

Given that de Zayas states “Especially in matters of trade, it is imperative to give all stakeholders the opportunity to weigh in the negotiations so as to ensure transparency and accountability,” we urge Council to endorse the model trade and investment treaty process offered in the [www.dontdoit.nz](http://www.dontdoit.nz) petition

The petition takes the government at its word where it said to the NZ Parliament in the [Speech From The Throne 9 November 2017](#) that it will exclude investor state dispute mechanisms (from TPP) and avoid their inclusion in all future agreements. The petition acknowledges the Labour Party 2017 Trade election manifesto where it offers “[Greater engagement with civil society over trade talks](#)” suggesting a democratic process toward a standing general mandate for New Zealand’s future negotiations to guide NZ's trade negotiators.

**Recommendation #3** (page 21 attachment)

We urge the council to support the [Local Government \(Four Well-beings\) Amendment Bill](#) which amends the Local Government Act (LGA) 2002 to reinstate references to social, economic, environmental, and cultural well-being that were removed by the National government in 2012.

The “four well-beings” were a cornerstone of the LGA 2002 when it was introduced. The “four well-beings” provide the modern focus of local government on serving and being accountable to the communities they serve. It highlights the constitutional role that local governments play in community development and nation building.

**Recommendation #4** (page 23 attachment)

We urge you to read and consider Kate Raworth's “[Doughnut Economics](#)” as a framework for thinking about economics in the 21st century given that the challenges we are facing this century are global in scale but local in solution and we need a different mindset from the economics of the past if we are to viably approach these challenges.

<https://www.kateraworth.com/doughnut/>

**Attached paper:**

**NZ on the cusp of greatness - we make the case for action to ensure ethical governance in New Zealand – Evidence paper to NZ Regional Councils and Territorial Authorities March 2018**

Many thanks for your consideration.

Greg Rzesniowiecki (on behalf of many in civil society)



## **NZ on the cusp of greatness - we make the case for action to ensure ethical governance in New Zealand**

### **Evidence paper to NZ Regional Councils and Territorial Authorities March 2018**

The TPP has been through a tumultuous process, agreed and signed 4 February 2016, then Trumped January 2017.

The remaining 11 nations negotiated a new agreement signed 8 March 2018 in Chile called Comprehensive and Progressive Agreement on the Trans Pacific Partnership (CPTPP). It is substantially the [same agreement with 22 suspended provisions pending the return of the US](#).

The likelihood of the [US rejoining the TPP](#) is increasing with a number of pronouncements from Administration officials.

The developing trade war prompted by US tariff increases on Steel and Aluminium imports [requires careful consideration](#). The tariffs are directed at the US trading deficit with China. The US has maintained a trade surplus with NZ over the [past several years of NZ – US trade](#).

New Zealand is active in trade and investment treaty [negotiations with a number of nations and blocs](#).

Civil Society opposition to trade and investment treaties centres on [several key concerns](#);

- Secrecy of negotiations and negotiating mandate
- Executive/Crown prerogative to treat with foreign powers without civil society consultation - then retrospectively legislate the agreement as a [fait accompli](#)
- Entrenchment of property rights as superior to human, community and ecological rights
- Entrenchment and enforcement of investor property rights through the advance grant of Investment State Dispute Settlement (ISDS) protection
- ISDS provides greater rights to foreign investors than domestic investors and businesses
- Trade treaties conflict with states' obligations in other international agreements, including those protecting human rights, labour standards and the environment
- Impinge on Māori rights in respect to te Tiriti o Waitangi

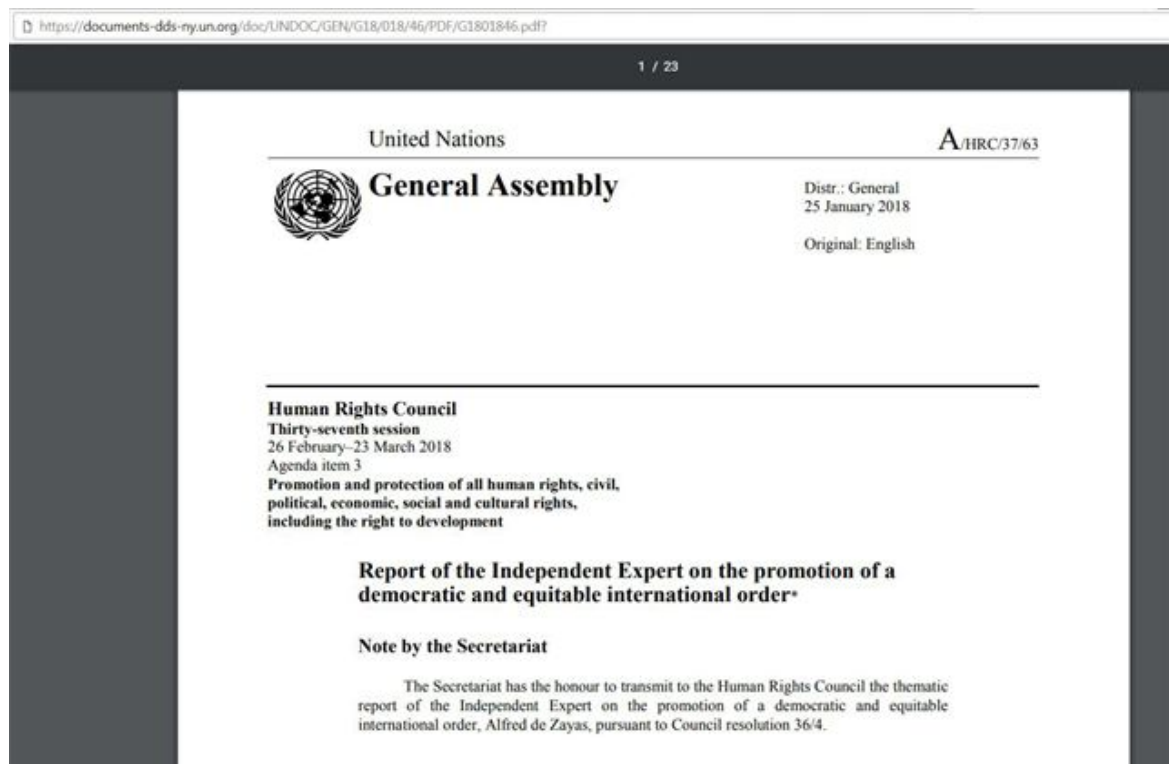
- Limit the ability of Local Government to make decisions for the wellbeing of their constituency
- Trade treaties confer new monopoly rights over the use and distribution of knowledge and the digital domain or commons.

### The duty of government

GENEVA (15 March 2018) – Alfred de Zayas the UN’s first Independent Expert on the promotion of a democratic and equitable international order, shared his seventh and final thematic report to the Human Rights Council at an event on the margins of the Council’s 37th session.

We suggest that the Council considers formally supporting the 23 principles offered by Alfred de Zayas in his [paper to the UNHRC \(A/HRC/37/63\)](#) in which he "highlights the urgent need to apply human rights principles systematically and uniformly to all entities and endeavours."

De Zayas states “What we see is a financial system rigged in favour of powerful individuals and corporations, unequal participation in governments and international organisations, and communities suffering from a reduction of social services, imposed austerity, privatization of public utilities, the misplaced priorities of political leaders and a general absence of genuine representation,” - UN Human Rights High Commission [press release](#). Image of front matter;



From the media release;

*In his full report\* – based on six years of work on the mandate – the Independent Expert identifies 23 principles of international order which should guide all individuals and institutions to achieve a more just and inclusive world. Among them, he highlights the supremacy of the UN Charter over all other treaties, the validity of the human rights treaty regime over commercial and other interests, and the inviolability of State sovereignty. “Moreover, any and all exercise of power, especially economic power, must be subject to some democratic controls,” said de Zayas.*

### **On the nature of the global order and how it is directed**

Alfred de Zayas' purpose promoting a democratic and equitable international order is undermined by the actions of those who would hack elections for sectarian ends. Global news media are reporting the Facebook Cambridge Analytics scandal through late March 2018.

Some investigative journalists highlighted the concern late last year, notably [Dr. Nafeez Ahmed who offered this prophetic advice in December 2017](#);

*What do NATO, private military contractors, aerospace firms, wine merchants, the NSA, Trump, British property tycoons, Russian oligarchs, and Big Oil have in common? The world's largest social network.*

*Imagine a world in which everybody gave away their freedom, willingly, in return for belonging to a toxic network which, rather than enriching their lives, profited from eroding civil discourse, polarizing communities, and manipulating their minds.*

*Wouldn't you wonder what was wrong with these people? You would.*

*And yet that is the world you are about to inhabit, right now.*

*Unless you do something about it.*

Many individuals and organisations use facebook for it's benefit as a connector, however, where we connect with community building, commerce, social enterprise, family, causes and movement in the democracy, Facebook will be mining our data for end user utility and profit. In the case of Cambridge Analytica through unethical and likely unlawful means.

It is only through exposure of the Cambridge Analytica scandal that Facebook CEO Mark Zuckerberg has announced that he will be reviewing the way his operation does business. It is notable that when Facebook commenced operation Zuckerberg committed to the principle that people who joined would control their data. Here it is demonstrated that trust is built on a track record, not on blind faith that a person will honour their word.

The CPTPP E-Commerce chapter becomes crucial to the question, “who directs and benefits from one's data?”

The owners of the data and large [E-Commerce corporations are excited about CPTPP's E-Commerce Chapter](#) and seeks to spread it to NAFTA and around the World. What is good for them is not necessarily good for democracy and ordinary people's interests.

[Nz's Privacy Commission offers advice in respect to the CPTPP](#) privacy concerns which gained a comment from Eugene Alfred Morgan-Coakle capture on the quality of trust;



In the meantime democracy and human rights to privacy is under threat in a new piece of legislation passed by the [US Congress and signed by President Trump Friday 23 March 2018](#) called the [Cloud Act](#). It passed through both houses attached to a spending bill. Electronic Frontier Foundation (EFF) makes the following observations about the Cloud Act's implications.

*There's a new, proposed backdoor to our data, which would bypass our Fourth Amendment protections to communications privacy. It is built into a dangerous bill called the CLOUD Act, which would allow police at home and abroad to seize cross-border data without following the privacy rules where the data is stored.*

*This backdoor is an insidious method for accessing our emails, our chat logs, our online videos and photos, and our private moments shared online between one another. This backdoor would deny us meaningful judicial review and the privacy protections embedded in our Constitution.*

*This new backdoor for cross-border data mirrors another backdoor under Section 702 of the*

*FISA Amendments Act, an invasive NSA surveillance authority for foreign intelligence gathering. That law, recently reauthorized and expanded by Congress for another six years, gives U.S. intelligence agencies, including the NSA, FBI, and CIA, the ability to search, read, and share our private electronic messages without first obtaining a warrant.*

*The new backdoor in the CLOUD Act operates much in the same way. U.S. police could obtain Americans' data, and use it against them, without complying with the Fourth Amendment.*

All of which has serious implications for NZ data security and personal privacy where data is stored outside of New Zealand, with or without the US in CPTPP. US internet corporations Apple, Google, Facebook, Amazon and more store our data on US servers or overseas.

How stable and secure are these platforms given they rely on public confidence to maintain their share price and corporate value? The Herald ran a story 19 March 2018, "[Why the tech bubble is ready to burst](#)" a few days before the markets took vengeance on the Facebook share price over election hacking, stripping over US\$60billion from the value of the stock. Bubbles invariably burst with unpredictable results – 2008 Great Financial Crisis (GFC) is one recent example.

## **Who to trust**

Increasingly it appears that one's data is being employed to support interests that one is opposed to. Where one loses ownership of one's data, one loses the right to limit its reproduction and use.

No sane democrat wants future local body or NZ general elections to be determined by who is most clever with data manipulation. We cannot allow our democracy to be hacked. Due Diligence demands counter measure planning, to ensure electoral integrity given we are a democracy.

It is of note that the [GCSB's role](#) is to protect the NZ Internet space in that it protects certain traffic to facilitate secure communications for NZ Government and selected commerce or NGO operations. One would think the electoral system in a nation would be worth protecting from hacking.

Surely the NZ Echelon partners at the US NSA or the UK GCHQ would be capable to detect election hacking and close it down.

If US intelligence services did detect the Facebook-Cambridge Analytics election hack - they didn't do the democracy any service by thwarting the coup that resulted. [Cambridge Analytics parent company is SCL Group](#) is linked to elite personalities in the UK and US establishment with Security and Intelligence connections. This fact might explain why the UK and US Intelligence Services were thwarted from or reluctant to protect their realms. UK and US regulators are moving on the matter with [Zuckerberg facing question in the US](#). [NZ Justice Minister Andrew Little coincidentally has announced a review of NZ's Privacy Laws](#), with the Privacy Commissioner calling for fines for

breaches of up to \$1million.

Given the level of supposed surveillance it is a puzzle that the breaches are only discovered after the horse has bolted. What tricks will those who desire to hack elections dream up for the next round of ballots?

One question for the NZ Government and its intelligence services, is the degree to which Cambridge Analytics, SCL Group or any other are tampering with or hacking NZ's electoral system.

### **Local Government has a Duty of Care to ensure integrity of their electoral process**

Democracy elections and democratic practice is the basis for the NZ Sovereign State and as such it is integral to the State's existence.

Hacking elections, disseminating fake news, lack of transparency, and deep state interest, threaten the integrity of the democratic process, and call into question the validity of government formation - all of which undermines state cohesion and creates ground for unnecessary internal dissent.

British humanist, philosopher, public intellectual and prolific author [AC Grayling lectured at the NZ Festival in Wellington](#) the talk theme, "With dirty politics, authoritarian leaders and the simultaneous rise of populism rampant across the planet, what can individuals do to preserve democracy, the "least worst" system of government?" Grayling lays bare the specific problems of 21st-century democracy in his new book [Democracy and Its Crisis](#).

AC Grayling suggests that given the Cambridge Analytics hack of the Brexit Referendum, the result is no longer valid, "[We were conned.. and now we need a new referendum](#)" is his response to the hacking of the UK electoral process.

### **Electronic Ballots – how secure?**

NZ is discussing electronic voting on ballots that are machine readable. Is that wise from the perspective of integrity and trust in the process, whether it has been manipulated or otherwise? Why rely on trust, when we can be secure and transparent? It is imperative that we design integrity into our democratic process.

### **Elections can be gamed - it's all in the code**

[Clinton Curtis testifies to a US Senate panel](#) that he was asked by Yang Corporation to write code to manipulate a Diebold Vote Counting machine in time for the 2000 Bush Gore Election. Curtis demonstrates that the Florida State vote of the Bush 2000 election was gamed! Politics US style.

US and Dutch scientists ask "[Are we witnessing a dishonest election? A between state comparison based on the used voting procedures of the 2016 Democratic Party Primary for the Presidency of the United States of America.](#)" They compared ballots from the 2016 Democrat Primary race

between Hillary Clinton and Bernie Sanders and found a curious correlation; Where there was a paper receipt the ballots went to Sanders, whereas those that were only electronic went to Clinton!

## **On the Deep-State**

A majority of the American public believe that the U.S. government engages in widespread monitoring of its own citizens and worry that the U.S. government could be invading their own privacy. The Monmouth University [Poll finds a large bipartisan majority who feel that national policy is being manipulated or directed by a “Deep State”](#) of unelected government officials.

## **Deep-State enemy of choice**

The issue of 'Russian hacking' of the US election is of note particularly given the US record of interference in other nations' affairs, elections, to the point of initiating coups and wars for regime change. We do not seek to justify any meddling in the affairs of sovereign nations. It is a fundamental principle of the [UN Charter - the right to self determination](#).

The UK is employing similar tactics in its bone pointing toward Russia over the alleged nerve gassing of Sergei and Yulia Skripal in Salisbury 4 March 2018.

Craig Murray ex UK Ambassador and 'former' intelligence asset [says there's no evidence to connect the Russians](#). Craig states he's winning the public discussion as there's [no valid counter proposal from supporters of the UK line that Russia dunnit](#).

It is clear that our allied states, UK, US, Canada and Australia in 5 Eyes or Echelon Spy agreement have made many false accusations on the back of 'false or no evidence' – [2003 Iraq War on the basis of Weapons of Mass Destruction \(WMD\)](#) being one large publicly known lie.

We know that internal processes are insufficiently powerful to correct intelligence services and the government ministers' utterances, prior to declarations of foreign policy intent and war-making.

The tendency to 'lie about the facts' indicates an ideological perspective, that isn't above systemically concocting evidence to support the 'club effort against the declared enemy'. The party interest is known as the Military and Industrial Complex – which utilise the security state to create tension and then profit from it through supplying the materials to conduct the resultant hostilities.

The NZ Afghanistan Hit and Run scandal uncovered by John Stevenson and Nicky Hager in their [Hit and Run book](#) highlight NZ involvement and complicity in War Crimes for Empire.

One year after the March 2017 Hit and Run assertions, [NZ Defence Chief Gen Tim Keating finally admits that the events did take place in the places referenced in Stephenson's book](#).

The UK Prime Minister Tony Blair lied to the world about weapons of mass destruction (WMD) in

Iraq in order to advance the [Iraq War on the basis of false intelligence](#). The Iraq war is credited with the murder of up to a million people and the displacement of many more, both internally and into neighbouring nations as well as hundreds of thousands to Europe and many to Oceania – the globalised impacts of modern war are far reaching.

It is very apparent that Secretive Intelligence agencies and deep agendas within the deep-state are corrupting global politics through a [strategy of tension](#);

*The strategy of tension is a method of social control involving a series of covert attacks upon a population, intended to promote stress and fear amongst them. The purpose is, by inducing a mistrust of one another and of the world at large, to increase child-like dependence upon perceived authority figures (such as national governments). The English phrase originates from the Italian (strategia della tensione), which was first applied to Operation Gladio in Italy.*

The hate Russia disease appears to have mutated and spread to New Zealand with the [Prime Minister making a statement that Russia was to blame](#) without any tangible evidence to support the assertion;

*Despite the further details that have emerged since the NZ government statement earlier this week, and despite the international outcry, the Russian reaction has been cynical, sarcastic and inadequate.*

*There is no plausible alternative explanation hitherto, that this came from anywhere other than Russia, and no doubt whatsoever that Russia has serious questions to answer.*

It appears to be the [price of the club membership](#). The question that John Key then a National MP posed to the Clark Government in respect to the 2003 Iraq War makes clear that gaining a [Free Trade Agreement with the US](#) depended on New Zealand joining the [Criminal Iraq War](#).

Is joining criminal wars the price that New Zealand wants to pay for its export trade?

Fact: the nexus between trade, foreign affairs, national competition for control of resources and war making. Last words by Stuff's David Armstrong Monday 26 March where he states [there's no evidence of Russian involvement in the Skripal case](#); "Free trade between morality and economic might."

### **Deep-state lies to expedite war-making - how to counter the narrative?**

To counter this tendency to spread propaganda and lies for sectarian (deep-state) interest it is imperative that the democracy assert control over the state where it is being engaged for nefarious purpose. The point becomes important in the globalised context to ensure all government dealings and relations with individuals, corporations, interests and governments that lead to commercial,



contractual, treaty or legislative amendment are open to public scrutiny.

## **Open Government - Shine light into the workings of Government**

The one vehicle which provides a window into Government action is the Official Information Act (OIA) 1982.

Minister for Justice Andrew Little took a question from National MP Brett Hudson 7 December 2017, who asked about Little's proposed review and/or reform of the OIA, Hudson's question, [What reform is he planning to make to the Official Information Act 1982?](#)

The NZ Government is yet to formally notify when the public consultation on any OIA reform proposals might occur.

The NZ Law Commission 2010 issues paper, [The Public's Right to Know \(IP18\)](#) discussed areas of possible reform relating to New Zealand's official information legislation. It sought public comment on preliminary proposals. This Issues Paper is part of the Commission's Review of the Official Information Act 1982 and Parts 1-6 of the Local Government Official Information and Meetings Act 1987;

*The key principle of the Official Information Act 1982 and the Local Government Official Information and Meetings Act 1987 is that official information should be made available unless in the particular case there is good reason for withholding it.*

## **Requirements of a functioning democracy**

Everyone says that transparency and open access to government information is critical to the maintenance of a well functioning democracy. We need to instrumentalise that to ensure public trust in government processes and decision making.

We have seen repeated instances where governments; local, central, NZ, and global claim privilege for the information they hold in order to stop the public from knowing what is being done in our name, and often without our consent.

Trans Pacific Partnership both as [TPP and CPTPP iterations were negotiated in secrecy which was only penetrated by leaks](#). Where has the NZ democracy sanctioned the government to reach agreements to alter NZ legislation then return to NZ with an Agreement and claim it's in the National Interest to Sign and Ratify it. Commercial privilege is claimed. Where has the NZ democracy said yes to ISDS in trade treaties?

## **War making – Creating Tension**

War is often initiated with false pretense or through the [ruse of a staged events](#) - examples;

- Nazi Germany's Reichstag Fire scapegoat communists 'regime change'

- US's Gulf of Tonkin non-event that was employed as the ruse for ramping up the Vietnam War against communists 'regime change'
- Afghanistan - Osama bin Laden and retribution for the 9/11 event - Taliban 'regime change'
- Iraq - weapons of mass destruction (WMD) and 'regime change'
- Libya responsibility to protect and the case against the leader Gaddafi – 'regime change'
- Syria and the case for 'regime change'
- UK Salisbury Skripal nerve agent attack – case for attacking Russia = Putin 'regime change'

Each of the listed nations and disputes is informed to the NZ and global population through the statements of national officials and the reporting of the Mainstream News Media.

The public are told in all of the above examples that the security agency reports or the Government statements and acts make the case for an attack on a sovereign nation.

Here is a [critique of the hate Russia narrative](#) by a London businessperson;

*On 1st March, Vladimir Putin gave his annual address to the Federal Assembly in Moscow.*

*Unsurprisingly, one segment in particular drew the attention of the western press – the section on defence. Putin described a number of highly advanced weapons systems scheduled to come online over the next few months and years. He explained the necessity for the development of these systems, particularly since George W. Bush's withdrawal from the ABM treaty in 2002, and went on to describe the parameters within which they would be used. In the passage below, you will see that he alludes to recent statements made by the United States, in which they have asserted their prerogative to make a first nuclear strike:*

*“We are greatly concerned by certain provisions of the revised nuclear posture review, which expand the opportunities for reducing and reduce the threshold for the use of nuclear arms. Behind closed doors, one may say anything to calm down anyone, but we read what is written. And what is written is that this strategy can be put into action in response to conventional arms attacks and even to a cyber-threat.*

*I should note that our military doctrine says Russia reserves the right to use nuclear weapons solely in response to a nuclear attack, or an attack with other weapons of mass destruction against the country or its allies, or an act of aggression against us with the use*

*of conventional weapons that threaten the very existence of the state. This all is very clear and specific.*

*As such, I see it is my duty to announce the following. Any use of nuclear weapons against Russia or its allies, weapons of short, medium or any range at all, will be considered as a nuclear attack on this country. Retaliation will be immediate, with all the attendant consequences.*

*There should be no doubt about this whatsoever. There is no need to create more threats to the world. Instead, let us sit down at the negotiating table and devise together a new and relevant system of international security and sustainable development for human civilisation. We have been saying this all along. All these proposals are still valid. Russia is ready for this”*

*Anyone who has followed international politics since the sixties will hear echoes of ‘mutually assured destruction (MAD)’ in this passage. I.E. “No-one can win, we will all lose, so let’s calm it down’...with the addition of what was missing for much of the cold war...”so let’s talk”.*

*This is not how the speech was reported in western media. Here are some of the headlines:*

*The Guardian: “Putin threatens US arms race with new missiles declaration”*

*The BBC: “Russia’s Putin unveils ‘invincible’ nuclear weapons”*

*The Washington Post: “Putin just bragged about Russia’s nuclear weapons”*

*Of course, it is easy to understand how those outlets could draw such inferences from the speech – anyone with half a brain and a drum to bang could take any segment and extract a case for ‘Russian aggression’. However, read the whole speech, attempt to put yourself in Russia’s shoes for even a moment...and what you will notice about western coverage is an almost total lack of objectivity, intelligent analysis, or understanding. In short, our media do not attempt to see the world through the eyes of Vladimir Putin...*

The author concludes in the following terms;

*Finally, let me say this: I have no personal animosity towards individual journalists who peddle this crap. I don’t know them personally. They may have been ‘duped’, they may have been ‘persuaded’, they may be ‘assets’. I don’t know on an individual basis.*

*What I do know is this: a war-mongering mind-set has taken hold in governments, in our security services, and increasingly in the military...a mind-set that the media is drip-feeding into the population. On that score, I am personally committed to exposing this mind-set for what it is: whether it is print media hacks with their whitewashing of the US funding of al-*

*Qaeda and the White helmet 'psyop'; or whether it is the televisual media that parrots the governmental line on anything Putin says, does, or doesn't do...I will not sit quietly by whilst these sociopaths and morons take us to war...again.*

*To my fellow citizens I say this: Make up your own mind – don't blindly believe me or anyone else; and for God's sake don't let the government and the media make up your mind for you.*

*To politicians and the media, I say this: I haven't forgotten Iraq even if you have. If you think for one moment that I'm going follow you down the warpath on the basis of zero evidence or blatant 'bullshit' – it's never going to happen. Either tell the truth, or get out.*

### **Transparency and open government is a public good**

Each council and territorial authority has matters that it has hidden from constituents. Likewise Central Government. It could be argued that privilege is necessary, however, where privilege is employed to misrepresent or do unlawful activity – “false accusations of culpability” there needs to be a public interest test mediated in a competent court to ensure that all decisions are taken with the utmost integrity and with a full weighing of facts and the benefit of human rights law.

[World Scientists' Warning to Humanity: A Second Notice](#) published 13 November 2017 co-signed by 15,000 Scientists;

*Twenty-five years ago, the Union of Concerned Scientists and more than 1700 independent scientists, including the majority of living Nobel laureates in the sciences, penned the 1992 “World Scientists' Warning to Humanity” (see supplemental file S1). These concerned professionals called on humankind to curtail environmental destruction and cautioned that “a great change in our stewardship of the Earth and the life on it is required, if vast human misery is to be avoided.” In their manifesto, they showed that humans were on a collision course with the natural world. They expressed concern about current, impending, or potential damage on planet Earth involving ozone depletion, freshwater availability, marine life depletion, ocean dead zones, forest loss, biodiversity destruction, climate change, and continued human population growth. They proclaimed that fundamental changes were urgently needed to avoid the consequences our present course would bring.*

The scientists recommend;

*Sustainability transitions come about in diverse ways, and all require civil-society pressure and evidence-based advocacy, political leadership, and a solid understanding of policy instruments, markets, and other drivers. Examples of diverse and effective steps humanity can take to transition to sustainability include the following (not in order of importance or urgency): (a) prioritizing the enactment of connected well-funded and well-managed*

*reserves for a significant proportion of the world's terrestrial, marine, freshwater, and aerial habitats; (b) maintaining nature's ecosystem services by halting the conversion of forests, grasslands, and other native habitats; (c) restoring native plant communities at large scales, particularly forest landscapes; (d) rewilding regions with native species, especially apex predators, to restore ecological processes and dynamics; (e) developing and adopting adequate policy instruments to remedy defaunation, the poaching crisis, and the exploitation and trade of threatened species; (f) reducing food waste through education and better infrastructure; (g) promoting dietary shifts towards mostly plant-based foods; (h) further reducing fertility rates by ensuring that women and men have access to education and voluntary family-planning services, especially where such resources are still lacking; (i) increasing outdoor nature education for children, as well as the overall engagement of society in the appreciation of nature; (j) divesting of monetary investments and purchases to encourage positive environmental change; (k) devising and promoting new green technologies and massively adopting renewable energy sources while phasing out subsidies to energy production through fossil fuels; (l) revising our economy to reduce wealth inequality and ensure that prices, taxation, and incentive systems take into account the real costs which consumption patterns impose on our environment; and (m) estimating a scientifically defensible, sustainable human population size for the long term while rallying nations and leaders to support that vital goal.*

*To prevent widespread misery and catastrophic biodiversity loss, humanity must practice a more environmentally sustainable alternative to business as usual. This prescription was well articulated by the world's leading scientists 25 years ago, but in most respects, we have not heeded their warning. Soon it will be too late to shift course away from our failing trajectory, and time is running out. We must recognize, in our day-to-day lives and in our governing institutions, that Earth with all its life is our only home.*

### **Looking forward - New Zealand assists creating a better World**

We encourage New Zealand to adopt Alfred de Zayas' recommended principles to the 9 March 2018 side-event to the 37th session of the Human Rights Council on international order and multilateralism . Alfred focused primarily on his visit to Venezuela 26 November to 4 December 2017 and uses that expedition to [highlight the 23 principles of international order which should guide all individuals and institutions to achieve a more just and inclusive world.](#)

Alfred's suggestions bear careful and deliberate consideration the are critical to comprehend for democracy advocates.

It ought be noted that NZ has championed causes previously through the UN - most recently the [Security Council resolution 2334 on Palestine 23 December 2016](#) concerning Israeli settlements in

"Palestinian territories occupied since 1967, including East Jerusalem"

We will never achieve justice in law without a concerted global campaign. In a globalised world we require a global movement toward just law. We encourage all NZ Regional Councils and Territorial Authorities to be partners in creating the solution.

### **Recommendation #1**

We suggest that the Council considers formally supporting the 23 principles offered by Alfred de Zayas in his paper to the UNHRC (A/HRC/37/63) thus endorsing their merit and requesting the New Zealand Government similarly endorse them and champion them in International Fora and diplomatic relations and negotiations.

#### **Principles of international order**

The reports of the Independent Expert have been guided by numerous General Assembly resolutions, notably resolutions 2625 (XXV) and 3314 (XXIX), which, together with the Charter, propound a vision of a democratic and equitable international order. Based on the work of the mandate holder, the following should be generally recognized as principles of international order:

(a) Pax optima rerum. The noblest principle and purpose of the United Nations is promoting peace, preventively and, in case of armed conflict, facilitating peacemaking, reconstruction and reconciliation;

(b) The Charter takes priority over all other treaties (Article 103);

(c) Human dignity is the source of all human rights, which, since 1945, have expanded into an international human rights treaty regime, many aspects of which have become customary international law. The international human rights treaty regime takes priority over commercial and other treaties (see A/HRC/33/40, paras. 18–42);

(d) The right of self-determination of peoples constitutes jus cogens and is affirmed in the Charter and in common article 1 of the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights. The rights-holders of self-determination are peoples. The duty bearers are States. The exercise of self-determination is an expression of democracy and attains enhanced legitimacy when a referendum is conducted under the auspices of the United Nations. Although the enjoyment of self-determination in the form of autonomy, federalism, secession or union with another State entity is a human right, it is not self-executing. Timely dialogue for the realization of self-determination is an effective conflict-prevention measure (see A/69/272,

paras. 63–77);

(e) Statehood depends on four criteria: population, territory, government and the ability to enter into relations with other countries. While international recognition is desirable, it is not constitutive but only declaratory. A new State is bound by the principles of international order, including human rights;

(f) Every State has an inalienable right to choose its political, economic, social and cultural systems, without interference in any form by another State. Already in 1510 the Spanish Dominican Francisco de Vitoria, Professor of Law in Salamanca, stated that all nations had the right to govern themselves and could accept the political regime they wanted, even if it was not the best;

(g) Peoples and nations possess sovereignty over their natural resources. If these natural resources were “sold” or “assigned” pursuant to colonial, neocolonial or “unequal treaties” or contracts, these agreements must be revised to vindicate the sovereignty of peoples over their own resources;

(h) The principle of territorial integrity has external application, i.e. State A may not invade or encroach upon the territorial integrity of State B. This principle cannot be used internally to deny or hollow out the right of self-determination of peoples, which constitutes a jus cogens right (see A/69/272, paras. 21, 28, 69 and 70);

(i) State sovereignty is superior to commercial and other agreements (see A/HRC/33/40, paras. 43–54);

(j) States shall refrain in their international relations from the threat or use of force against the territorial integrity or political independence of any State or in any other manner inconsistent with the purposes of the United Nations (Charter, Art. 2 (4));

(k) States have a positive duty to negotiate and settle their international disputes by peaceful means in such a manner that international peace, security and justice are not endangered (Charter, Art. 2 (3));

(l) States have the duty to refrain from propaganda for war (International Covenant on Civil and Political Rights, art. 20 (1));

(m) States shall negotiate in good faith for the early conclusion of a universal treaty on general and complete disarmament under effective international control (A/HRC/27/51, paras. 6, 16, 18 and 44);

(n) States may not organize or encourage the organization of irregular forces or armed bands, including mercenaries, for incursion into the territory of another State;

- (o) States must refrain from intervening in matters within the national jurisdiction of another State;
- (p) No State may use or encourage the use of economic, political or any other type of measures to coerce another State in order to obtain from it the subordination of the exercise of its sovereign rights and to secure from it advantages of any kind;
- (q) No State may organize, assist, foment, finance, incite or tolerate subversive, terrorist or armed activities directed towards the violent overthrow of the regime of another State, or interfere in civil strife in another State;
- (r) The use of force to deprive peoples of their national identity constitutes a violation of their inalienable rights and of the principle of non-intervention;
- (s) The ontology of States is to legislate in the public interest. The ontology of business and investment is to take risks to generate profit. A treaty that stipulates one-way protection for investors and establishes arbitration commissions that encroach on the regulatory space of States is by nature *contra bonos mores*. Hence, the investor-State dispute settlement mechanism cannot be reformed; it must be abolished (see A/HRC/30/44, paras. 8, 12, 17 and 53, and A/70/285, paras. 54 and 65);
- (t) States must respect not only the letter of the law, but also the spirit of the law, as well as general principles of law (Statute of the International Court of Justice, Article 38), such as good faith, the impartiality of judges, non-selectivity, uniformity of application of law, the principle of non-intervention, estoppel (*ex injuria non oritur jus*), the prohibition of the abuse of rights (*sic utere tuo ut alienum non laedas*) and the prohibition of contracts or treaties that are *contra bonos mores*. It is not only the written law that stands, but the broader principles of natural justice as already recognized in Sophocles' *Antigone*, affirming the unwritten laws of humanity, and the concept of a higher moral law prohibiting unconscionably taking advantage of a weaker party, which could well be considered a form of economic neocolonialism or neo-imperialism (see annex II below);
- (u) States have the duty to cooperate with one another, irrespective of the differences in their political, economic and social systems, in order to maintain international peace and security and to promote international economic stability and progress. To this end, States are obliged to conduct their international relations in the economic, social, cultural, technical and trade fields in accordance with the principles of sovereign equality and non-intervention. States should promote a culture of dialogue and mediation;
- (v) The right to access reliable information is indispensable for the national and international democratic order. The right of freedom of opinion and expression necessarily includes the right to be wrong. "Memory laws", which pretend to crystalize history into a



politically correct narrative, and penal laws enacted to suppress dissent are anti-democratic, offend academic freedom and endanger not only domestic but also international democracy (see A/HRC/24/38, para. 37);

(w) States have a duty to protect and preserve nature and the common heritage of humankind for future generations.

Alfred concludes his report with two annexes to frame consideration of the 23 Principles of International Order, Human Rights Annex I and Rule of Justice Annex II.

The full text of each [annex can be accessed in the full report](#):

#### **Annex I - A new functional paradigm on human rights**

1. All rights derive from human dignity. Codification of human rights is never definitive and never exhaustive, but constitutes an evolutionary mode d'emploi for the exercise of civil, cultural, economic, political and social rights. Alas, the interpretation and application of human rights is hindered by wrong priorities, sterile positivism and a regrettable tendency to focus only on individual rights while forgetting collective rights. Alas, many rights advocates show little or no interest for the social responsibilities that accompany the exercise of rights, and fail to see the necessary symbiosis of rights and obligations, notwithstanding the letter and spirit of article 29 of the Universal Declaration of Human Rights.

2. The time has come to change the human rights paradigm away from narrow positivism towards a broader understanding of human rights norms in the context of an emerging customary international law of human rights. Law is neither physics nor mathematics, but a dynamic human institution that day by day addresses the needs and aspirations of society, adjusting here, filling lacunae there. Every human rights lawyer knows that the spirit of the law (Montesquieu) transcends the limitations of the letter of the law...(cont.)

Points 2 – 9 in UN report page 21; (A/HRC/37/63)

#### **Annex II - Rule of law must evolve into rule of justice**

1. The rule of law is a pillar of stability, predictability and democratic ethos. Its object and purpose is to serve the human person and progressively achieve human dignity in larger freedom.

2. Because law reflects power imbalances, we must ensure that the ideal of the rule of law is not instrumentalized simply to enforce the status quo, maintain privilege, and the exploitation of one group over another. The rule of law must be a rule that allows flexibility and welcomes continuous democratic dialogue to devise and implement those reforms

required by an evolving society. It must be a rule of conscience and of listening.

3. Throughout history law has been all too frequently manipulated by political power, becoming a kind of dictatorship through law, where people are robbed of their individual and collective rights, and the law itself becomes the main instrument of their disenfranchisement. Experience has taught us that law is not coterminous with justice and that laws can be adopted and enforced to perpetuate abuse and cement injustice. Accordingly, any appeal to the rule of law should be contextualized within a human-rights-based framework.

Points 4. - 6 in the UN report page 23; (A/HRC/37/63)

### **Trade and investment treaty effects on public policy**

Councillors will note the many references to trade and investment treaties and Investor State Dispute Settlement (ISDS) made by Alfred de Zayas in his 23 principles, namely;

(c) Human dignity is the source of all human rights, which, since 1945, have expanded into an international human rights treaty regime, many aspects of which have become customary international law. The international human rights treaty regime takes priority over commercial and other treaties (see A/HRC/33/40, paras. 18–42);

This statement is reasserted in many ways through the principles, notably in;

(i) State sovereignty is superior to commercial and other agreements (see A/HRC/33/40, paras. 43–54);

(p) No State may use or encourage the use of economic, political or any other type of measures to coerce another State in order to obtain from it the subordination of the exercise of its sovereign rights and to secure from it advantages of any kind;

(s) The ontology of States is to legislate in the public interest. The ontology of business and investment is to take risks to generate profit. A treaty that stipulates one-way protection for investors and establishes arbitration commissions that encroach on the regulatory space of States is by nature *contra bonos mores*. Hence, the investor-State dispute settlement mechanism cannot be reformed; it must be abolished (see A/HRC/30/44, paras. 8, 12, 17 and 53, and A/70/285, paras. 54 and 65);

(t) States must respect not only the letter of the law, but also the spirit of the law, as well as general principles of law (Statute of the International Court of Justice, Article 38), such as good faith, the impartiality of judges, non-selectivity, uniformity of application of law, the principle of non-intervention, estoppel (*ex injuria non oritur jus*), the prohibition of the abuse of rights (*sic utere tuo ut alienum non laedas*) and the prohibition of contracts or

treaties that are contra bonos mores. It is not only the written law that stands, but the broader principles of natural justice as already recognized in Sophocles' Antigone, affirming the unwritten laws of humanity, and the concept of a higher moral law prohibiting unconscionably taking advantage of a weaker party, which could well be considered a form of economic neocolonialism or neo-imperialism (see annex II below);

(u) States have the duty to cooperate with one another, irrespective of the differences in their political, economic and social systems, in order to maintain international peace and security and to promote international economic stability and progress. To this end, States are obliged to conduct their international relations in the economic, social, cultural, technical and trade fields in accordance with the principles of sovereign equality and non-intervention. States should promote a culture of dialogue and mediation;

The following have implications for trade treaties whilst having general importance;

(v) The right to access reliable information is indispensable for the national and international democratic order. The right of freedom of opinion and expression necessarily includes the right to be wrong. "Memory laws", which pretend to crystalize history into a politically correct narrative, and penal laws enacted to suppress dissent are anti-democratic, offend academic freedom and endanger not only domestic but also international democracy (see A/HRC/24/38, para. 37);

(w) States have a duty to protect and preserve nature and the common heritage of humankind for future generations.

### **TPP or CPTPP - on balance a public good?**

The best that can be said about the [CPTPP is that it provides limited economic benefits to NZ](#). That benefit is also a potential poor outcome where it expands our primary producing economy in a manner that increases NZ's emissions of greenhouse gases.

There is a [lot of material](#) on [TPP/CPTPP](#). The community that oppose its imposition on New Zealand are of a similar mind to the Union of Concerned Scientists, Alfred de Zayas the UN Independent Expert on the promotion of a democratic and equitable international order and Dr Nafeez Ahmed.

We ask, "why take binding and enforceable action to lock NZ and the region into an agreement that is patently against the interests of the present and future NZ State?"

[LGNZ previous President Lawrence Yule said in July 2017](#), "local government's vision for New Zealand in 2050 is a vibrant country enjoying environmental, social, cultural and economic prosperity" when launching the new [Local Government Position Statement on Climate Change, and 2017 climate change declaration](#) signed by 44 mayors from around the country. The statement includes the following passage;

*2. Policy alignment and a clear mandate to address climate change*

*Central government policies can support (or hinder) council, private sector and community action to respond to climate change.*

*Effective climate policy involves a diverse range of adaptation and mitigation actions. A broad review of existing policy is required to support climate change adaptation and mitigation actions.*

*To highlight that local government's actions to address climate change are part of a national effort, we seek an explicit mandate under the Local Government Act to consider how decisions affect climate change outcomes.*

We have already demonstrated in clear factual terms the limits that [TPP/CPTPP and the ISDS regime will impose on effective climate action](#). The [www.dontdoit.nz](http://www.dontdoit.nz) petition places importance on ensuring any trade and investment treaty NZ enters will not constrain effective climate action.

NZ must move to a future where everyone's wellbeing is nurtured. This could be ensured by way of amendment to the manner in which NZ negotiates, consults, signs and ratifies international trade and investment treaties.

The petition takes the government at its word where it said to the NZ Parliament in the [Speech From The Throne 9 November 2017](#) that it will exclude investor state dispute mechanisms (from TPP) and avoid their inclusion in all future agreements. The petition acknowledges the Labour Party 2017 Trade election manifesto where it offers [Greater engagement with civil society over trade talks](#) suggesting a democratic process toward a standing general mandate for New Zealand's future negotiations to guide NZ's trade negotiators.

**Recommendation #2**

We urge Council to endorse the model trade and investment treaty process offered in the [www.dontdoit.nz](http://www.dontdoit.nz) petition

The dontdoit.nz petition where it is implemented would ensure that New Zealand honours PM Jacinda Ardern's statement that MFAT will negotiate no further FTAs with Investor State Dispute Settlement (ISDS). It would ensure in a transparent and public manner that there would be no surprises or treaties negotiated that are adverse to NZ interests and inhabitants' wellbeing. The petition says in part;

***...urge the House to call upon the Government:***

*k) not to sign the TPPA or the Comprehensive and Progressive Agreement on Trans-Pacific*

*Partnership; (note: the petition was formulated prior to the 8 March 2018 CPTPP Signing in Chile)*

*l) to conduct a principles-based review of New Zealand's approach to free trade, investment and economic integration agreements that involves broad-based consultation;*

*m) to engage with Maori to reach agreement on effective protection of their rights and interests consistent with te Tiriti o Waitangi and suspend negotiations for similar agreements until that review is concluded;*

***and further, urge the House to pass new legislation that***

*(n) establishes the principles and protections identified through the principles-based review under paragraph (l) as the standing general mandate for New Zealand's future negotiations, including;*

*i. excluding ISDS from all agreements New Zealand enters into, and renegotiating existing agreements with ISDS;*

*ii. a requirement for the government to commission and release in advance of signing an agreement independent analyses of the net costs and benefits of any proposed agreement for the economy, including jobs and distribution, and of the impact on health, other human rights, the environment and the ability to take climate action;*

*iii. a legislative requirement to refer the agreement to the Waitangi Tribunal for review prior to any decision to sign the treaty; and*

*(o) makes the signing of any agreement conditional on a majority vote of the Parliament following the tabling in the House of the reports referred to in paragraph (n) (ii) and (iii);*

***and for the House to amend its Standing Orders to***

*(p) establish a specialist parliamentary select committee on treaties with membership that has the necessary expertise to scrutinise free trade, investment and economic integration agreements;*

*(q) require the tabling of the government's full mandate for any negotiation prior to the commencement of negotiations, and any amendment to that mandate, as well as periodic reports to the standing committee on treaties on compliance with that mandate;*

*(r) require the tabling of any final text of any free trade, investment and economic integration agreement at least 90 days prior to it being signed;*

*(s) require the standing committee on treaties call for and hear submissions on the mandate, the periodic reports, and pre-signing version of the text and the final text and*

*report on those hearings to Parliament;*

*(t) require a two-third majority support for the adoption of any free trade, investment or economic integration agreement that constrains the sovereignty of future Parliaments that is binding and enforceable through external dispute settlement processes.*

### **Recommendation #3**

#### **Support the Local Government (Four Well-beings) Amendment Bill**

We urge the council to support the [Local Government \(Four Well-beings\) Amendment Bill](#) which amends the Local Government Act (LGA) 2002 to reinstate references to social, economic, environmental, and cultural well-being that were removed by the National government in 2012.

The “four well-beings” were a cornerstone of the LGA 2002 when it was introduced. The “four well-beings” provide the modern focus of local government on serving and being accountable to the communities they serve. It highlights the constitutional role that local governments play in community development and nation building.

The bill is sponsored by Paul Eagle MP (previously Wellington City Councillor). It would be a great demonstration of the alignment between Local Government and Central Government to achieve wellbeing for all NZ inhabitants. The bill offers the following explanation;

*The Bill amends the Local Government Act 2002 to reinstate references to social, economic, environmental, and cultural well-being that were removed by the National government in 2012.*

*The “four well-beings” were a cornerstone of the Act when it was introduced. The “four well-beings” provide the modern focus of local government on serving and being accountable to the communities they serve. It highlights the constitutional role that local governments play in community development and nation building.*

*The removal of the “four well-beings” by the National government was based on factual inaccuracies and misconceptions. The effect of the removal of the “four well-beings” is wide reaching and is not limited to section 10 amended by the National government, as the four-well beings permeate the Local Government Act 2002 and there are references to them in other Acts.*

*Given that the “four well-beings” remain in these other acts of Parliament, the risk of inconsistency and confusion is real, especially with the Resource Management Act 1991 and the Local Government Act 2002. Many Mayors and Councillors continue to be concerned that the National government’s removal of the “four well-beings” and its replacement*

*wording is sufficiently unclear as to almost certainly lead to legal challenges of the way local authorities interpret their responsibilities, especially legal challenges from well-resourced special interest groups.*

*In its submission on the Local Government Act 2002 Amendment Bill, Local Government New Zealand, the representative body of local governments representing all 78 local authorities in New Zealand, had this to say—*

- “There is no evidence that a substantive problem exists that requires legislative change. The examples by the Government to justify the proposed change are not examples of a failure of the well-beings. The examples adduced are either explicable due to the underlying circumstances, for example, holdings in particular business activities which are mandated by the communities affected and deliver an acceptable commercial return or address a community need”*
- “There is no evidence that councils are finding it difficult to decline requests for funding. Instead the recently completed long-term planning round suggests that the opposite is the case. Councils have been aware of the straightened financial circumstances that the country is in and have been fiscally prudent as a result. The prime driver of rates increases is infrastructure investment”*
- “Most significantly, the proposed amendment will likely have significant legal and cost implications. These implications arise for both decision-makers and the community, who are likely to be confused by its intent or application. It is concerning that the legal (and associated cost) consequences of the proposed amendment do not appear to have been considered by the Government. The Regulatory Impact Statement is silent on this point. The proposed new purpose, and how it changes the proper interpretation of specific obligations under the LGA 2002, is sufficiently unclear as to almost certainly lead to legal challenges of the way local authorities have interpreted their responsibilities. In light of the body of case law under the existing provisions, it would be naïve to think that changing those provisions would not encourage further litigation by well resourced interest groups who opposed particular local authority decisions. As a result, the proposed change is likely to produce significant costs without any concomitant benefit”*
- “Given the lack of a problem definition, the lack of any evidence to substantiate the general claims made by Government about the impact of the well-beings, and the un-scoped legal risk associated with the change, the proposal to alter the well-beings appears somewhat reckless”*
- “As a result of this analysis, the members of LGNZ resolved unanimously at its Annual General Meeting on 15 July 2012 that the Government should retain the well-beings”*

We believe that NZ Local Government support this initiative as there was universal opposition to the removal of the Wellbeings from the LGA 2002.

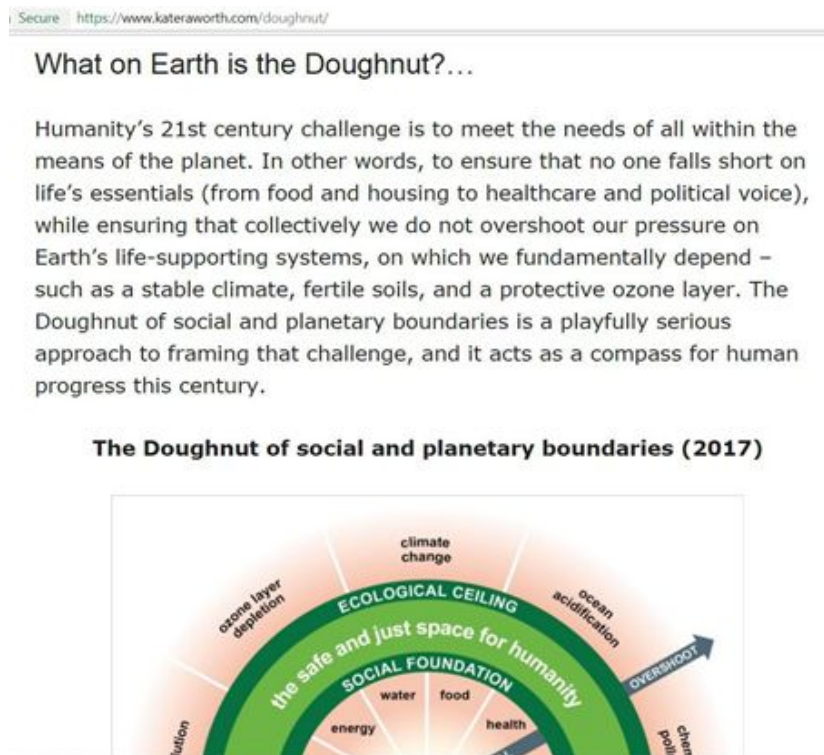
**Recommendation #4**

We urge you to read and consider Kate Raworth's "[Doughnut Economics](https://www.kateraworth.com/doughnut/)" as a framework for thinking about economics in the 21st century given that the challenges we are facing this century are global in scale but local in solution and we need a different mindset from the economics of the past if we are to viably approach these challenges.

<https://www.kateraworth.com/doughnut/>

Kate Raworth's book, "[Doughnut Economics: Seven Ways to Think Like a 21st-Century Economist](https://www.kateraworth.com/doughnut/)" on Amazon.

More of [Kate Raworth's publications and writings](https://www.kateraworth.com/doughnut/) are available at her website.



<https://www.kateraworth.com/about/> a brief CV;



Secure | <https://www.kateraworth.com/about/>



Kate Raworth is a renegade economist focused on exploring the economic mindset needed to address the 21st century's social and ecological challenges, and is the creator of the **Doughnut** of social and planetary boundaries.

She is a Senior Visiting Research Associate at Oxford University's **Environmental Change Institute**, where she teaches on the Masters in **Environmental Change and Management**. She is also a Senior Associate at the **Cambridge Institute for Sustainability Leadership**.

Her internationally acclaimed idea of Doughnut Economics has been widely influential amongst sustainable development thinkers, progressive businesses and political activists, and she has presented it to audiences ranging from the UN General Assembly to the Occupy movement. Her book, *Doughnut Economics: seven ways to think like a 21st century economist* is being published in the UK and US in April 2017 and translated into Italian, German, Spanish, Portuguese, Dutch and Japanese.

Ends.



File ref: 2.3.5  
29<sup>th</sup> March 2018

Basil Chamberlain  
Chief Executive  
Taranaki Region Council  
Private Bag 713  
STRATFORD 4352

Dear Basil

**Submission to the TRC's 2018/2028 Long-Term Plan by Fish & Game NZ (Taranaki Region)**

Thank you for the opportunity to comment on the TRC's 2018-2028 Long-term Plan (LTP).

**Ramping up biodiversity protection – towards a predator-free Taranaki**

As a foundation member of Wild for Taranaki, Fish & Game NZ (Taranaki Region) is very supportive of the TRC's preferred option to implement the first three years of a region-wide predator control programme, focussing on the Waiwhakaiho catchment, around Mt Taranaki and trialling possum eradication in an area west of the mountain. We wish the TRC and Wild for Taranaki every success in raising the external funding required to see this project proceed and we are keen to help with this project in any way that we can.

**Key native ecosystems and biodiversity plans**

Fish & Game remains very supportive of the TRC's programme of working with interested landowners, iwi, community groups and organisations such as QEII and Fish & Game to voluntarily protect and enhance the ecological values of key native ecosystems. Fish & Game has worked collaboratively with willing landowners, the TRC and QEII to successfully enhance and protect a number of wetlands in the region. In our view, the approach is working well and is resulting in some great outcomes for biodiversity.

**Extending existing programmes - Freshwater quality monitoring**

The intention to commit more resources to freshwater monitoring in order to meet the requirements of the NPS-FM is supported. In particular, we support the extension of the TRC's periphyton monitoring programme so that it includes monthly chlorophyll-a sampling, along with concurrent nutrient sampling and hydrological monitoring.

Periphyton proliferation, and the consequent adverse effects on pollution-sensitive macro-invertebrate communities, remains a significant issue in the middle and lower reaches of Taranaki streams and rivers, with summer sampling by the TRC revealing that over the years a number of sites have breached the NPS-FM's 200 mg chl-a/m<sup>2</sup> national bottom line.

*Statutory managers of freshwater sports fish, game birds and their habitats*

**Taranaki Region**

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In our experience, periphyton blooms can occur in any month of the year, all that is needed is a period of low flow recession. Therefore, a move to a monthly sampling regime is welcomed.

However, we do have a concern that a number of lower catchment sites currently monitored in the TRC's summer periphyton programme will not be carried through into the new sampling regime. These sites include the Patea River at Skinner Road; Manganui River at Bristol Road, Waiongana River at SH3A and Devon Road; Waingongoro River at Ohawe (or a similar accessible site in the lower reaches), and the Waiwhakaiho River's lower reaches (preferably the riffle downstream of Mangaone Stream confluence). These sites are all in regionally significant waterways and without them there is a risk that the revised monitoring programme will be seen as avoiding lower catchment sites that have previously experienced significant blooms of periphyton. Sites in the lower reaches of small ringplain catchments that originate outside Egmont National Park (e.g. Waitotoroa, Matanehunehu) are also not well represented in the new sampling regime. We appreciate that the more sites there are, the greater the cost, but in our view the inclusion of additional lower catchment and small ringplain catchment sites adds significantly to the robustness of the monitoring programme and is money well spent.

#### **Extending existing programmes - Education**

Fish & Game supports the TRC's intention to promote long-term action on sustainability and environmental protection by funding a regional position for the Enviroschools organisation.

#### **Extending existing programmes - Working with iwi and hapu**

Fish & Game supports the TRC's intention to deepen its connection with Maori by (among other things) helping iwi to extend their capacity to contribute to resource consent and planning processes.

#### **Resource Management**

##### **The provision of effective fish passage and removal of unused weirs**

In its submission to the TRC's 2015/2025 LTP, Fish & Game requested that the TRC provide additional resources to resolve long-standing fish passage issues at a number of high priority weirs, including the "Riverlands Eltham" weir on the Waingongoro River and the Kaupokonui Glenn Road weir. Fish & Game's submission also requested that additional resources be provided to facilitate the removal of other un-used structures impeding fish passage (e.g. such as a concrete farm access ford in Kapuni Stream; see Appendix 1) and to assess un-consented farm access culverts for fish passage. Removal or upgrade of these structures are potentially easy wins in terms of improving fishery values across the region, and re-establishing the connectivity between the Maunga and the sea.

Our understanding in respect of un-consented farm access culverts is that TRC land management staff are currently in the process of assessing whether riparian plan holders have fish friendly culverts, or not.. In our view, adding farm access structures into the TRC's Land Management Riparian Plan Auditing Programme would be a key additional step that would encourage landholders to have all their culverts fish friendly in order to qualify for a completion certificate. Culverts that continue to restrict fish passage would then require a resource consent pursuant to Rule 64 of the Regional Freshwater Plan.

In terms of fish passage issues at major structures, including the Riverlands and Glenn Road weirs, there doesn't appear to have been much progress and so we continue to request that additional resources be provided in the TRC's LTP to ensure that these issues are addressed.

### **Resource management**

#### **Lake Rotomanu water quality**

Lake Rotomanu is (or was) an important multi-use recreational resource used for swimming, water skiing, jet skiing, kayaking, trout fishing and model boating. The surrounding grassed area is an important dog walking "off the leash" area. The lake is included in the TRC's summer bathing water quality sampling programme.

Lake Rotomanu has suffered from poor water quality since the collapse of its weed-beds in September 2001, but water quality has worsened significantly in recent years. In the current bathing season, signs warning of potentially toxic cyanobacteria blooms (no dogs or swimming) have been in place continuously since 8<sup>th</sup> November 2017, with the lake remaining in the high risk category for contact recreation ( $>1.8\text{mm}^3/\text{L}$ ) right through until 19<sup>th</sup> March 2018 and peaking at a planktonic cyanobacteria bio-volume of  $7.59\text{mm}^3/\text{L}$  in early February 2018. Given the severity of the bloom this summer, it could be considered fortuitous that no dogs have died from drinking the lake water. The current water quality is therefore seriously affecting use of this recreational resource, which is highly valued by New Plymouth residents.

A major contributing factor to the bloom is the lack of water flow through the lake. An inlet structure that was re-instated by the TRC following the March 1990 flood, allows water to enter the lake from the adjacent Waiwhakaiho River. Prior to 2009, water flowed continuously into the lake and even when the river was at low flow the water level was at the top of the lake inlet pipe. However, following river works by the TRC in 2009 to maintain the flood channel capacity of the lower Waiwhakaiho River, the river bed level has dropped in the vicinity of the intake so that when the river is at low flow, lake water now flows back out of the inlet pipe into the river (see photos in Appendix 1). This change means that there is now no water flow into the lake for long periods, which clearly has had a major negative impact on water quality.

The NPDC did have \$175,000 allocated in its 2014/15 annual plan to reconfigure the intake, but this was stripped out and re-allocated in its 2015-2025 LTP (despite a submission to the contrary from F&G), so that currently there are no plans or funding to remedy this situation.

What Fish & Game is seeking from the TRC is for it to allocate resources to this project in its 2018-2028 LTP to form a working group with the NPDC and interested parties such as recreational users and Fish & Game in order to formulate a design and funding plan to reconfigure the Lake Rotomanu inlet structure. Fish & Game is making a similar submission to the NPDC's 2018-2018 LTP.

**Resource management  
Riparian management programme audit**

Most farmers are doing a great job fencing and planting waterways to meet the TRC's 2020 target and the audit process to check existing riparian plans to ensure they capture all waterways and wetlands and are fenced and planted to national water quality expectations is very much supported.

One additional aspect for consideration in the audit process is the impact of stormwater discharges from farm races and bridges on water quality. Farm bridges are often at a low point on the farm race and the discharge of accumulated sediment, nutrients and faecal coliforms to surface water during rainfall events can be substantial (Appendix 1). While replacing problematic bridges with more substantial and environmentally friendly structures is expensive and not always practicable, the use of stormwater cut-offs and sumps and silt traps along farm races would go a long way to reducing the amount of effluent being discharged to streams. Including stormwater discharges from farm races in the TRC's Land Management Riparian Plan Auditing Programme would seem to be a good way to address the issue and would help the TRC to achieve its regional targets for swimmable rivers under the NPS-FM.

We do wish to be heard in relation to this submission.



Allen Stancliff  
Fish & Game Officer  
Fish & Game NZ

**Appendix 1**

Warnings about potentially toxic blooms of planktonic cyanobacteria have been posted at Lake Rotomanu since 8<sup>th</sup> November 2017.



**Lake Rotomanu intake – water flowing back out the inlet and into the Waiwhakaiho River  
(20<sup>th</sup> March 2018)**



Dis-used concrete farm access ford on Kapuni Stream downstream of Opunake Road that is a significant impediment to fish passage and relatively straight forward to fix.



Kaupokonui Glenn Road weir – at just 50 metres altitude and 5.1km from the sea, this structure is a significant barrier to fish passage.





This farm race and bridge will discharge effluent to surface water with each heavy rainfall.



## Joe Mack

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**From:** pamelacordery <giddyp1965@gmail.com>  
**Sent:** Tuesday, 3 April 2018 7:29 PM  
**To:** info  
**Subject:** Long Term Plan Submission, Taranaki Crossing

pamelacordery <[giddyp1965@gmail.com](mailto:giddyp1965@gmail.com)>

to info

This submission is in regard to the Taranaki Crossing Proposal.

I am in support of a crossing but ONLY for walkers, NOT for cyclists.

My first point is actually a Question: Has work already begun on this? Does the TRC have any knowledge of who is cutting tracks through the Katiake Ranges, ie within the Egmont National Park boundaries? My concern is that this is becoming a fait accompli by the time submissions are being sought. Can assurance be given that this is not the case?

As to a shared track, this is fundamentally flawed. As is constantly seen on the foreshore, some cyclists and walkers are unable to share successfully. My point is that in native bush, with lots of corners and no long-range vision, coupled with mountain biking which by nature is fast, there *will* be accidents. Particularly as children walking in front of their adults (a common thing as they love to be the explorer and 'first' in their group, surely the point of providing such a track) will be the first to encounter cyclists coming from the opposite direction. Therefore, "share with care" is unreasonable and doomed. This is exacerbated by the fact that many users will be overseas tourists, who instinctively pull right rather than left, which obviously in limited space will be problematic. If opposing parties are both walking, not a problem, but with the speed of cyclists, dangerous.

The easy accessibility from Oakura is a fabulous opportunity for all abilities to get into the National Park and be immersed in real native bush. This does however compound the clash between cyclists and walkers, as not all users will be of an experienced level. I do see the idea of this track as a positive in terms of offering an alternative to Around the mountain or Summit climbs. I regularly tramp myself and often encounter tourists who are ill-equipped and/or inexperienced for attempting these routes. So to promote an alternative which still has appeal is a good idea. There are issues however:

1) The Pouakai Crossing which is widely promoted worldwide, but not with enough accurate or up to date info for many of the tourists I meet. Promotion of a new track should not be happening before preparations are completed. The tracks become quickly eroded and broken down which is damaging the precious environment and endangering users. It is important that this does not happen with a "Taranaki Crossing". An example of this is currently, a slip (near Boomerang Slip) on the Round the Mountain Track, which is part of the Pouakai Crossing is dangerous and has closed this track, yet it is still promoted. I know that some users are ignoring the warning of this closure and its detour and crossing the slip anyway. It would be very distressing if the proposed track did not avoid any similar situations by ensuring the route does not include high risk erosion/damage terrain. Careful consideration of planning would be far preferable to damage control in hindsight. TRC must ensure due diligence now. This is particularly since not only official websites share info, but also travel blogs etc and commercial businesses with vested interests will be wanting to promote the track, so it must be of a resilient nature and sufficient standard first.

The disparity between internet promotion and reality on the ground is illustrated by an anecdotal story of someone who arrived at Pouakai Hut at dusk on a cold evening with weather closing in. He encountered a young Japanese tourist who had enough information to hear of the Pouakai Crossing, and had come up Mangorei Track to the hut. Whereupon she expected to be able to buy her dinner and have a warm bed. She had no food or warm bedding and was unable to light the fire, all potentially dangerous. Apparently it was a language barrier that had caused this situation. A similar situation occurred this summer when some locals met two people with no overnight gear or decent wet weather gear who thought they were walking around around the mountain in one day. Fortunately the locals were able to explain this was not going to happen and convinced them to turn around before they ran out of daylight. Again weather was closing in quickly, a local phenomenon which visitors don't expect and are caught out by the speed of. So, with this proposal, these realities need to be considered. Hut and shelter placements need to allow not only for experienced, long range users.

Another clash between bikers and walkers is around hut placement. A cyclist can get a lot further than a walker, so huts are not necessarily in the right place for both.

2) Liaison between DOC and TRC needs to be efficient and effective. Again, as with my first point I question this at the moment. Therefore, car-parking, toilets, and track building and maintenance need to be well planned ahead of time and well maintained. Damage to the native bush needs to be kept to a minimum, which is not necessarily the case with

of the Curtis Falls track is very overgrown and has been for years. Whilst this may be a DOC rather than TRC issue, I do not agree with cutting a whole new route when those already in use are not maintained.

3) Mountain bikers have themselves admitted that if they are allowed access to native forests they will want to 'go hard'. This is detrimental to the bush itself, and to other users. This surely is diametrically opposed to the values of the TRC. Broken bike parts will contribute to the litter and contamination left behind.

Pamela Cordery  
[giddyp1965@gmail.com](mailto:giddyp1965@gmail.com)

**Joe Mack**

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**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Thursday, 29 March 2018 5:50 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

Howie

**Surname**

Tamati

**Organisation (if applicable)**

Sport Taranaki CEO

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Howie@sporttaranaki.org.nz

**I wish to present my submission personally at a hearing scheduled for 7 May**

Yes

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

**Comment**

Yes this is vital for the health and well being of the province and our reputation nationally and internationally as a region that maintains a high standard of work in the environment . If we are to maintain the regions standing in New Zealand the predator control program is vital to this province

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

### Tracks and Trails

Sport Taranaki supports the work of the Taranaki Regional Council (TRC) in relation to the development of the Kaitake trail and the outstanding development of Pukeiti. The work to date already provides an outstanding asset to the province of Taranaki. We believe this will create national and international interest and acclaim.

We note the current work of the Walking Access Commission Aotearoa along with Sport Taranaki to develop a comprehensive and cohesive mapping of the whole of Taranaki and the plan to develop an overview of Tracks, Trails and Cycle-ways that combines the work of the TRC and the three Local Authorities. This provides a regional focus towards this type of outdoors development that acknowledges Mouna Taranaki is the heart of the province and everything flows from it. We encourage the TRC to continue to support the collective approach and work closely with these interested parties.

We are excited by the plans for the Kaitake Trail and the approach taken by TRC in building the cycle way and walkway following the paper road plan, this again showing the innovation and vision of TRC. We also encourage the development of facilities that would provide overnight accommodation on the trails top allow an enhanced experience on the mountain range.

Sport Taranaki is committed to improving the health and wellbeing of the of the Taranaki community through healthy and active lifestyles. The work that is underway through the TRC is seen as a great opportunity to encourage the Taranaki community to personally engage with the Mouna and to make the connection with its beauty and its majestic power.

### **Other proposed changes**

#### **Comment**

#### Working with Iwi

Sport Taranaki is supportive of the actions of the Taranaki Regional Council in their commitment to working with the Iwi of Taranaki.

For too many years nga Iwi o Taranaki had been on the side lines of the fields in which the TRC have worked. The progress in including Maori into supporting the many aspects of the work of the regional council is to be admired. The TRC have taken a lead role nationally in working collaboratively with Taranaki Maori and gaining their respect in doing so. Operationally Maori have much to offer with the added value of historical knowledge and stories that can be added into the work of the TRC will be beneficial

We are certain that this relationship will be a positive and valuable one for the future.

Sport Taranaki would support the idea of Regional Environschools we would like to see the development of trained and knowledgeable people working to educate and engage young local people to have a closer meaningful connection to Mouna Taranaki and its environment and special ecosystems .It will assure the mouna is cared for and protected for the years to come.It is our hope that we have Taranaki people walking, tramping, climbing and riding on our mouna.

### **Additional comments**

#### **Additional comments explanation**

#### **Comment**

I am writing on behalf of Sport Taranaki as CEO in regard to the possible rebuild of the Eastern stand and redevelopment of the stadium facilities.

The pressure is on the Taranaki region to make sure that Yarrow Stadium gets through the east stand earthquake prone issue in the best way possible. This can be seen as an opportunity to improve on what was already a very good operational stadium.

Yarrows Stadium is seen as a major regional sporting asset recognised throughout New Zealand. It has hosted a large number of international and national events over the years. It has been an asset that we in the province of Taranaki have been proud to see and to use.

Yarrows Stadium has provided the opportunity to add value to the region with the influx of visitors

to the province who take time to stay over and take the time to get to know more about the region and see its key places of interest.

The stadium has provided a home for the Taranaki Rugby Football Union executive management, coaches and team management, also KJD Catering. The supporters lounge has hosted events, luncheons, dinners and activities for the general public.

This is a major issue in the sporting scene, something that can't be ignored and must be dealt with the help of the whole Taranaki region and not left on the shoulders of one group.

The funding for the strengthening work and possible demolition and rebuild is obviously going to be a major issue for everyone involved but the pressure is greatest on the Taranaki Regional Council.

The property owner is the Taranaki Stadium Trust (the Trust). The purpose of the Trust is to promote the effective and efficient maintenance, development, management, operation and promotion of Yarrow Stadium as a community asset used for recreation, sporting and cultural activities for the benefit of the people of Taranaki, working in particular with Taranaki Regional Council (TRC) and New Plymouth District Council (NPDC).

TRC and NPDC have entered into dual funding partnerships for the operations and long term maintenance and development of Yarrow Stadium. NPDC manages, generates the revenue and funds the operations of Yarrow Stadium and TRC funds the long-term maintenance and development of the stadium.

To assist them we propose the TRC should look towards increasing the regional levy/rate currently in place to help with recovery and rebuild/strengthening.

Financially, the impact of this proposal for ratepayers is relatively minor. Note from the TRC proposed LTP:

The Council is proposing an increase of 3.5 percent in its general rates take for 2018/2019. In the last three years, the average general rates increase has been 0.97%. Over the life of the 2018/2028 Long-Term Plan the general rates increase averages out at 2.8%.

We don't believe it appropriate that NPDC (North Taranaki only) be asked to contribute additional funds via its own rates as Yarrows Stadium is a regional asset, it has its existing regional levy, and it should use the levy to raise funds from the region as a whole.

The potential to spread the cost of the repairs and rebuild over the long-term life of the facilities would be shared in an inter-generational way and help ease the pressure on the ratepayers.

Another point to consider is once the fate of the building is known, that the region consider the Ministry of Business Industry and Employment Provincial Growth Fund (\$1 billion every year for three years) to help with the fix. From what we know, regions around the country have an 18 months window to develop and put forward projects that will benefit their regions for the longer term and create actual jobs.

The Yarrows Stadium rebuild has the potential to provide employment within the region over that time and other positive opportunities to the province. It will have its benefits within the cost of the rebuild.

While the actual cost is not yet confirmed, construction of the east stand which includes a multi sport facilities offer as proposed in the Strategic Plan will do this for Taranaki.

Sport Taranaki encourages the TRC to formally apply to the MBIE, Provincial Growth Fund for this funding stream it is a worthwhile exercise. Sport Taranaki would be happy to support any such application in this matter. to support the Taranaki Regional Council

- Document 1**
- Document 2**
- Document 3**
- Document 4**

**Joe Mack**

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**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Tuesday, 3 April 2018 8:37 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

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067526966

**Mobile**

0272580000

**Email address**

suttonp@xtra.co.nz

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

**Other proposed changes**

**Comment**

Agree with all three proposals.

**Additional comments**

**Additional comments explanation**

**Comment**

**Document 1**

**Document 2**

**Document 3**

**Document 4**



**Joe Mack**

---

**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Tuesday, 3 April 2018 4:58 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

Tama

**Surname**

Blackburn

**Organisation (if applicable)**

**Full postal address, including rural delivery and postcode**

20b CALGHER AVENUE, Waitara, Taranaki 4320

**Phone (daytime)**

**Mobile**

0212595887

**Email address**

tama@nzsurfingadventures.com

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

More involvement by iwi and hapu for trapping.

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

Definitely

**Other proposed changes**

**Comment**

All of the above.

**Additional comments**

**Additional comments explanation**

**Comment**

Can we Introduce walk and bike tracks further up the Waitara river and plant more flax/harakeke and start a fibre production of this great resource?

If you call me I can explain more.

**Document 1**

**Document 2**

**Document 3**

**Document 4**

## Joe Mack

---

**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Wednesday, 4 April 2018 3:37 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

### Title

(please choose one)

### If other, please specify

#### First name

Gwyneth

#### Surname

Barker

### Organisation (if applicable)

Kindergarten Taranaki - Koromiko Kindergarten

### Full postal address, including rural delivery and postcode

26 Koromiko Ave  
Hawera 4610

### Phone (daytime)

06 2783028

### Mobile

#### Email address

koromiko@kindergartentaranaki.co.nz

### I wish to present my submission personally at a hearing scheduled for 7 May

No

### Your submission

#### Towards predator-free Taranaki

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

### Comment

#### Pukeiti/Taranaki Crossing

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

### Comment

#### Other proposed changes

#### Comment

Our Kindergarten has been involved in education for sustainability for over a decade and a part of the enviroschools programme for three years. Many other of the kindergartens in our Association have joined also. Being part of the programme gives us a structure for introducing sustainable practices and guidelines for teaching the children about caring for all living things and the

environment. All of the Centres involved in enviroschools are able to support and encourage one another and exchange ideas. Because the programme is wider than just our Association (schools and other early childhood education centres) it gives valuable information about what a range of other educational centres are doing. Having a broader base of sponsor organisations, with the Taranaki Regional Council joining up, and the creation of a further Enviroschools regional position can only be beneficial for all.

We strongly recommend that you go ahead with this proposal.

**Additional comments**

**Additional comments explanation**

**Comment**

**Document 1**

**Document 2**

**Document 3**

**Document 4**

**Joe Mack**

---

**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Thursday, 5 April 2018 10:15 AM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028  
**Attachments:** LTP-submission.pdf

**Title**

Ms

**If other, please specify**

**First name**

Jenny

**Surname**

Goddard

**Organisation (if applicable)**

Project Governance Board, Taranaki's Historic Cathedral Project

**Full postal address, including rural delivery and postcode**

Taranaki Cathedral, 37 Vivian Street, New Plymouth, 4310

**Phone (daytime)**

021 612 846

**Mobile**

021 612 846

**Email address**

jenny@taranakicathedral.org.nz

**I wish to present my submission personally at a hearing scheduled for 7 May**

Yes

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

Fully support the exciting development linking Pukeiti to the coast

**Other proposed changes**

**Comment**

Support development of each of the three areas

**Additional comments**

**Additional comments explanation**

**Comment**

**Document 1**

LTP-submission.pdf - [Download File](#)

**Document 2**

**Document 3**

**Document 4**

The Governance Board of The Cathedral Project support the involvement of Taranaki Regional Council in The Regional Gardens, Puke-ariki and Yarrow Stadium.- We congratulate you on the development work at Pukeiti and endorse the plans for links with the Pouakai Crossing Track .The benefits to the region are obvious and commendable..

As a key stakeholder in the cultural well being and prosperity of the region we feel it is timely to update Taranaki Regional Council on The Cathedral Project.

New Zealand's oldest stone church is here in Taranaki. Currently closed pending earthquake strengthening, the Taranaki Cathedral and its historic church yard are a veritable treasure trove of stories of our region and our people.

The formal objectives of this project are

to upgrade, re energise and restore Taranaki Cathedral, safeguarding a Category 1 Heritage building and its history for generations to come

to showcase the story the buildings and site tell of the relationship between Maori and Pakeha that happened here; a story of pride and shame told in a way that will resonate with all New Zealanders and ultimately contribute to enhanced bi-cultural relationships in the future.

to create a nationally significant tourist drawcard assisting the region to meet Visitor Sector growth targets identified in the Regional Growth Strategy, Tapaue Roa.

This is an ambitious five year project that starts with the remediation and upgrade of the Cathedral to make it a more flexible place for worship, arts, music, drama and other events. Additionally a world-class welcoming and function space will be built which will tell the cathedral's story and honour the memory of former governor-general and first Māori archbishop, Sir Paul Reeves. The enhancement of the historic site also incorporates on site car parking and the adjacent wooden vicarage, built in 1899.

Seen by Kelvin Day at Puke Arika as a complementary experience to the museum, the aim is for the building and graveyard to be the centre piece of professionally curated displays that showcase the story of European settlement in Taranaki and the relationship between Maori and Pakeha over 175 years. Through a truthful telling of a turbulent and colourful history that saw the Church acting as a garrison, the project will make a unique contribution nationally to enhanced bi-cultural understanding and relationships in the future.

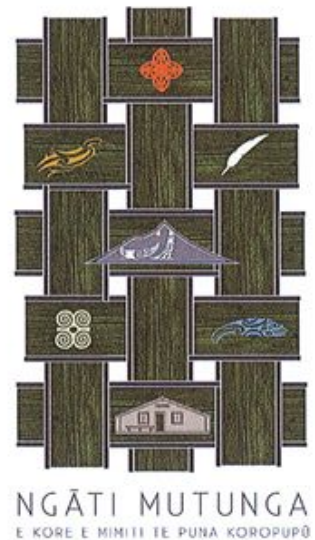
As well as being a place of worship and community events, once completed, Taranaki Cathedral is expected to help add to Taranaki's reputation as a popular tourist destination. It will provide an educational and interpretative experience through the remediated and upgraded Cathedral, displays, audio visual guides and multi-media resources. It is estimated that annually it will draw more than 64,000 domestic visitors, more than 10,500 international visitors and contribute about \$7.3 million to the regional economy.

We are keen to keep Taranaki Regional Council updated over the next three years as the Cathedral Project comes to reality. We see synergy in our goals for the prosperity of the region and preservation of cultural heritage and would welcome any opportunity for further discussion.

5 April 2018

2018/2028 Long-Term Plan Submission  
Taranaki Regional Council  
Private Bag 713  
Stratford 4352

Email: [info@trc.govt.nz](mailto:info@trc.govt.nz)



## TE RŪNANGA O NGĀTI MUTUNGA SUBMISSION ON THE TARANAKI REGIONAL COUNCIL LONG TERM PLAN

### Toward Predator-Free Taranaki

Te Rūnanga o Ngāti Mutunga would like to congratulate the Taranaki Regional Council on the work it has done towards eradicating pests in Taranaki. The Rūnanga has two Key Native Ecosystem areas managed with the Taranaki Regional Council and have received excellent support, advice and practical help in working towards eradicating pests from these areas.

However, while we support any work to eradicate pests in the whole of Taranaki, we would like the Taranaki Regional Council to make a commitment to match the funding that they are proposing to spend on pest control work on the Taranaki Ring Plain (Egmont Ecological Region) with work to be carried out on the Eastern Hill Country (North Taranaki and Matemateonga Ecological Regions).

While we understand the need to build on and support the work being carried out on the Mouna we feel that the best biodiversity gains in Taranaki will be made from pest control in the Eastern Hill Country. For example in working to connect the existing pest control networks in north and east Taranaki – namely Tiaki te Mauri o Parinihi Trust, East Taranaki Environmental Trust and Lake Rotokare Scenic Reserve.

We would like to work with the Taranaki Regional Council on any pest control work to be carried out in the Ngāti Mutunga rohe and we have people available who are willing to help with this work on the ground.

### OTHER PROPOSED CHANGES

#### Further Develop Relationships with Māori

We would fully support any efforts that the Taranaki Regional Council make to improve and develop better relationships with the Tangata Whenua and their role as traditional kaitiaki of the land.

Tangata whenua hold an important store of traditional knowledge about our awa, mouna, moana and ngāhere that would help the Taranaki Regional Council develop a more holistic view of environmental management.

Te Rūnanga o Ngāti Mutunga look forward to engaging with the Taranaki Regional Council using a 'mana whakahono a rohe' agreement in the near future.



### **Commit More Resources to Freshwater Monitoring**

We would like the Council to increase the monitoring stations in north Taranaki, at present there is only one MCI SEM sampling or physiochemical SEM sampling sites within Ngāti Mutunga and very few, if any, in the northern and eastern areas of Taranaki that we can use to help us make informed decisions about freshwater management.

We would like the Council to make adequate resources available to Iwi so we are able to carry out the necessary cultural health monitoring within the rohe of Ngāti Mutunga ourselves. We realize that the Taranaki Regional Council needs this information for its State of the Environment reporting to central government.

We would like to acknowledge the support that the Taranaki Regional Council has given to Ngāti Mutunga through the SHMAK training and upskilling we have received from Taranaki Regional Council over the last 18 months.

### **General Comments**

We would like to see the council develop a strategy for dealing with erosion in the Uruti Valley – due to the negative impact this is having on the Mimitangiatua River – an important Awa Tupuna for Ngāti Mutunga.

This could include implementing the level of riparian planting that we have seen the council require on the Ring Plain and also promoting the retirement of land that is not suitable for farming as the Council has done in the Waitotara catchment

Thank you for considering our submission.

Ngā mihi,



Paul Cummings  
**Pouwhakahaere**

Taranaki Regional Council

Document No:

- 3 APR 2018

Document No of Reply:

### Submission form

#### Submitter

Title (please circle) Dr (Mr) Mrs Ms Miss Other (please specify)

First name Craig Surname Campbell-Smart

Organisation/group (if applicable) Taranaki Emergency Management Office

Postal address (Please provide full postal address, including rural delivery and postcode)

45 Robe street

New Plymouth ~~4510~~


Postcode 4310

Phone (daytime) Mobile 027 2435796

Email craig.campbell-smart@cdemtaranaki.govt.nz

I wish to present my submission personally at a hearing scheduled for 7 May

Yes  No

Signed 

#### Your submission

Note that your submission and any information you supply as part of it is considered public information and will be available in reports and documents relating to this process and will be published on our website, [www.trc.govt.nz](http://www.trc.govt.nz).

#### Towards predator-free Taranaki

Do you think the Council should implement the first three years of a region-wide predator control programme, focusing on the Waiwhakaiho catchment, around Mt Taranaki and trialling possum eradication at an operational cost of \$580,000 per year?

Yes  No

#### Comment

.....  
.....



### Pukeiti/Taranaki Crossing

Do you think the Council should undertake a range of new developments at and linked to Pukeiti, positioning it as a recreation hub for a range of activities, including funding the creation of a new track linking Pukeiti to the coast – a key component of the Mountain to surf Taranaki Crossing – at a capital cost of \$1.439 million in 2018/2019 and \$5.9 million over 10 years, plus an operating grant of \$3.5 million spread over three years (2019/2020 to 2021/2022)?

Yes  No

#### Comment

.....  
.....  
.....

### Other proposed changes

Tell us what you think of our proposals to:

- Further develop its relationship with Māori, focusing on operational areas.
- Commit more resources to freshwater monitoring.
- Broaden our educational outreach by funding a regional EnviroSchools position.

*(Note: Changes to arrangements with iwi and hapu, and changes to freshwater monitoring, are driven in part by central Government requirements. The status quo is not an option.)*

#### Comment

.....  
.....  
.....  
.....  
.....  
.....



## Additional comments

Please tell us your views on any other aspect of the proposed *2018/2028 Long-Term Plan*

Comment

*Please see attached submission.*



April 2018  
Document: 01\_07\_CDEM\_LTP\_submission\_to\_Councils-2018

**Office:** 06 758 1110  
**Freephone:** 0800 900 049  
45 Robe Street  
New Plymouth 4310

**Postal address:**  
c/- Taranaki Regional Council  
Private Bag 713  
Stratford 4352  
New Zealand

✉ [emo@cdemtaranaki.govt.nz](mailto:emo@cdemtaranaki.govt.nz)  
📧 @taranakiCD  
📘 TaranakiCivilDefence  
🌐 [www.cdemtaranaki.govt.nz](http://www.cdemtaranaki.govt.nz)

2018/2028 Long-Term Plan Submission  
Chief Executive  
Taranaki Regional Council  
Private Bag 713  
STRATFORD 4352

**Submission on Taranaki Regional Council Long-Term Plan**

Thank you for the opportunity for the Taranaki Emergency Management Office (TEMO) to provide a submission to the consultation on the Taranaki Regional Council's (TRC) 2018/2028 Long-Term Plan.

This submission is made on behalf of the Civil Defence Emergency Management (CDEM) Group Office, known as the Taranaki Emergency Management Office (TEMO).

The primary contact point for this submission is:

Craig Campbell-Smart  
CDEM Manager  
Taranaki Emergency Management Office  
45 Robe Street  
New Plymouth 4310  
06 7581110  
[craig.campbell-smart@cdemtaranaki.govt.nz](mailto:craig.campbell-smart@cdemtaranaki.govt.nz)

Yours sincerely

A handwritten signature in black ink, appearing to read 'Craig Campbell-Smart'.

Craig Campbell-Smart  
CDEM Manager  
Group Controller / Group Recovery Manager

## **EXECUTIVE SUMMARY AND KEY RECOMMENDATIONS**

1. Taranaki Emergency Management Office (TEMO) supports the Taranaki Regional Council (TRC) 2018/2028 Long-Term Plan, and the Hazard Management group of activities that enhances the safety and wellbeing of the public and protects property from hazards and minimises damage.
2. TEMO acknowledges the enhancements to the civil defence emergency management (CDEM) contained in the plan, for the system delivering efficient and effective CDEM activity that is acceptable to the public, and increasing the emergency readiness and response capacity and capability in the region.
3. TEMO, as the office responsible for implementing the service level changes, works alongside with all four Councils within the Taranaki region to deliver effective and efficient CDEM. TEMO's role is to develop LTP budgets and workplans to deliver expected levels of service, and to meet legislated and regulatory requirements.
4. Significant change is occurring within the CDEM sector, both at a national level and within the Taranaki region with implementation of a new CDEM service model following the review of structural and functional delivery of responsibilities. The model is to be implemented by 1 July 2018.
5. Given the ongoing changes to the regional model, additional budget from 1 July 2018 is requested, to enable the appointment of statutory roles of Group Recovery Manager and Group Welfare Manager (part-time at \$26,000 per annum of the LTP for both), and three-year fixed-term part-time analyst to enhance development and review of hazard-specific response plans (\$40,000 years 1-3 of the LTP).
6. Additional budget will be apportioned across the CDEM Group members as per the agreed funding split, with TRC's contribution (at 34%) being as follows:
  - a. An additional \$8,840 per year for the statutory roles
  - b. An additional \$13,600 for year 1 to 3 for the analyst role

## **ADDITIONAL BUDGET REQUEST FOR THE TARANAKI EMERGENCY MANAGEMENT OFFICE**

7. TEMO is the office directly responsible for implementing the decisions of the Taranaki CDEM Group Joint Committee, which is the decision-making committee established under the Civil Defence Emergency Management Act (2002). To give effect to the Group's responsibilities under section 17 of the Act, TEMO has been established as the Group Office.
8. TEMO have been directly involved in the development of Long-Term Plan (LTP) budgets to ensure that operational and capital budgets are sufficient to deliver on the CDEM Group Joint Committee expectations. This has seen an increase in Group Office budget and staffing.

9. Implementation of the new CDEM model for structural and functional delivery of responsibilities has been ongoing since early 2017. The broad parameters of change have been established.
10. Given the breadth of change, work on defining the CDEM model is ongoing, with finer details continuing to be established. As such new appointments to key Coordinated Incident Management System (CIMS) positions are required as part of the review of structural and functional delivery of responsibilities for CDEM within Taranaki.
11. Statutory appointments by the Taranaki CDEM Group Joint Committee are required for Group Recovery Manager and Group Welfare Manager. Appointments are made by the CDEM Group Joint Committee in accordance with sections 26(2) and 29(2) of the Civil Defence Emergency Management Act 2002, and 62(6) of the National Civil Defence Emergency Management Plan Order.
12. Vacancies of Group Recovery Manager and Group Welfare Manager must be appointed in a timely manner to ensure full capability should a response be required. However, a recent decision has been made that these appointments will not be made from staff within the District Councils, due to the requirement to fully staff Emergency Operations Centres. Additional budget for the Group Office is therefore required for these appointments.
13. The positions of Group Recovery Manager and Group Welfare Manager require senior leadership skills and significant responsibilities across all phases of emergency management. Both of these roles are required to operate and prepare these activities prior to emergency, establishing the practices and systems to meet the demands of these statutory roles. Given the level of significance these roles are not appropriate to be delivered by volunteers or as part of an existing role.
14. Changes to the CDEM operational model also requires changes to all hazard contingency plans (15). The approved five-year policy development schedule (2018/2023), outlines a further 16 plans and standard operating procedures to be developed under the CDEM Groups requirement to deliver comprehensive emergency management.
15. The policy development schedule gives effect to the Comprehensive emergency management approach required in New Zealand. It is the integrated approach to civil defence emergency management, characterised by the four areas of activity, known as the '4Rs'. The approach was formally introduced to New Zealand legislation with the 2002 Act.
16. The success of any emergency during response and recovery is characterised by the quality of planning before an event. Plans give effect to the priority hazards identified within the statutorily required CDEM Group Plan for Taranaki. Planning enables roles and responsibilities to be identified, and clear contingency planning defined, ensuring that response and recovery decision-making is effective.
17. The Taranaki CDEM Group office currently employs one full time equivalent analyst. This role is to coordinate and write policies and plans, along with risk reduction and geo-spatial information system responsibilities. The planning resource is augmented with two full time

equivalent Emergency Management Advisers who write Standard Operating Procedures (SOPs).

18. Notwithstanding this, there is a significant workload ahead to complete and maintain a comprehensive set of plans, policies and SOPs, and increasing staffing levels at Group Office for planning would be the single largest factor to deliver the approved policy development schedule.
19. The recent CDEM Group decisions, on Group appointments not made from District Council staff and development and approval of the policy development schedule (2018/2023), has occurred after development and submission of the Long-Term budget for TEMO. This has meant that the additional funding required will not be in place, unless an amendment is made by each of the Taranaki Councils LTPs.
20. Working through the CDEM regional committees of the Coordinating Executive Group (CEG) and the Taranaki CDEM Group Joint Committee, TEMO has been referred to each respective CDEM Group member for this additional budget approval.





**Submission to  
Taranaki Regional Council  
on the  
Draft Long Term Plan 2018-2028**

**Date: 05 April 2018**

**TOURISM INDUSTRY AOTEAROA**

Level 4, 79 Boulcott Street, PO Box 1697, Wellington 6140, New Zealand  
P +64 4 499 0104 [www.tia.org.nz](http://www.tia.org.nz) E info@tia.org.nz

Tourism Industry Aotearoa (TIA) welcomes the opportunity to comment on the Long Term Plan 2018-2028 of Taranaki Regional Council.

This submission is filed without prejudice to TIA's future position. Our ability to prepare a comprehensive submission responding to the consultation document relied on the provision by the Council of information relevant to the connection between the consultation document and the benefits that would accrue. If any information is provided at a later date, TIA reserve the right to comment further.

## **INTRODUCTION**

1. Tourism Industry Aotearoa (TIA) is the peak body for the tourism industry in New Zealand. With over 1,500 members, TIA represents a range of tourism-related activities including hospitality, accommodation, adventure and other activities, attractions and retail, airports and airlines, as well as related tourism services.
2. The primary role of TIA is to be the voice of the tourism industry. This includes working for members on advocacy, policy, communication, events, membership and business capability. The team is based in Wellington and is led by Chief Executive, Chris Roberts.
3. Tourism 2025 ([www.tourism2025.org.nz](http://www.tourism2025.org.nz)), an industry-led, government supported economic growth framework was launched in New Zealand in 2014 and has set an aspirational goal of reaching \$41 billion in annual tourism revenues by 2025. Spend growth has been rapid since 2014 and we are well on target to reach that goal.
4. This year, TIA is working on a Tourism 2025 reset that will include incorporating sustainability principles, articulating a longer-term view of tourism in coordination with Central Government; and identifying new priority actions to be addressed over the next 1-3 years.
5. Any enquiries relating to this paper should in the first instance be referred to Nienke van Dijken, TIA Policy Analyst at [nienke.vandijken@tia.org.nz](mailto:nienke.vandijken@tia.org.nz) or by phone on 04 494 1842.

### **TOURISM INDUSTRY AOTEAROA**

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## **TOURISM'S IMPACT AT A REGIONAL LEVEL**

6. The visitor spend from both international and domestic visitors for the Taranaki Regional Council was \$376m (YE Jan 2018).

<b>Council</b>	<b>Total visitor spend (YE Jan 2018)</b>
<b>Total</b>	<b>\$376m</b>
New Plymouth District	\$304m
South Taranaki District	\$52m
Stratford District	\$20m

Source: MBIE (2018)

7. The tourism industry makes a significant contribution to regional economic development through the jobs and income it creates. Only a fraction of visitor spending actually occurs in places commonly considered visitor specific e.g. accommodation, attractions. The rest takes place in shops, cafes, petrol stations and other local businesses. Local farmers and market gardeners benefit from selling their goods directly or indirectly to visitors.
8. On any day of the year, your community is hosting the visitors, domestic and international, who are helping support local jobs and businesses.
9. One of the keys to a strong regional visitor economy is the quality of the visitor experience. Councils play an important part in that experience with the investment they make in infrastructure e.g. roads, water/waste disposal, broadband, attractions and events in addition to their support for promotional bodies. Councils play a vital role in helping visitors, as well as ratepayers, make the most of their time in the community.
10. Councils' planning need to consider the needs of visitors and residents in their council planning, so the community can reap the benefits of the visitor economy.
11. In 2016, TIA developed a Local Government Manifesto, outlining eight priority actions for councils to reap greater economic and social rewards from tourism. A copy of this manifesto was sent to all Local Councils, ahead of the Local Council Election. For more details please refer to Appendix 1.

### **Challenges and opportunities of tourism growth**

12. Tourism growth presents both challenges and opportunities. The visitor economy is a major driver of regional prosperity but the costs and benefits of increased tourism do not always fall evenly. However, talk of new visitor taxes and levies must be debated robustly, with all the issues and options considered. Any form of national or local tourism tax or levy must be fair, efficient and ring-fenced for tourism-related investments.
13. We understand that the growth in tourism in your region may bring with it specific issues. The following section explores some of those likely issues, how the industry is responding and what you, as a Council, could do.

#### **TOURISM INDUSTRY AOTEAROA**

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#### 14. Infrastructure

Recent tourism growth has placed pressure on some infrastructure used by visitors. In order to better understand and size this issue, TIA undertook a [National Tourism Infrastructure Assessment](#) in 2016/17. The resulting report identified the main infrastructure deficits in both the private and public sectors.

The priority infrastructure types identified were:

- Visitor accommodation
- Telecommunications
- Airport facilities
- Road transport
- Car parking
- Public toilets
- Water and sewerage systems

Much of the infrastructure identified as a priority for investment is local and mixed use (used by both residents and visitors) and has often seen long-term under-investment. To optimise the benefits of tourism for host communities, coordination between Central and Local Government agencies and industry partners is needed for needed projects to proceed.

*What the Industry is doing:*

- TIA successfully advocated for the Tourism Infrastructure Fund resulting in a \$100m fund for local and mixed-use infrastructure.
- Tourism sectors able to scale-up quickly are doing so, e.g. the road transport sector has been able to respond quickly with increased fleet size.
- Operators are making significant private investment into infrastructure e.g. Skyline Queenstown's \$100m redevelopment.
- TIA is undertaking work to identify and address the key barriers to infrastructure investment.

*What you as a Local Council could do in regards to infrastructure:*

- Apply to the Tourism Infrastructure Fund for projects like new carparks, toilets and visitor facilities.
- Coordinate with Central Government and industry partners on infrastructure projects submitted to the Regional Growth Fund.
- Ensure the Long-term Plan accurately reflects the infrastructure needs of tourism.

#### 15. Social Licence to Operate

The fast growth of the visitor economy has caused unease in some host communities, with locals worried about the number of visitors and the impact. This places pressure on the social licence the industry has to operate within these communities.

*What the Industry is doing:*

- TIA in conjunction with Tourism New Zealand undertakes six-monthly 'Mood of the Nation' research to assess New Zealanders' views of tourism.
- TIA in conjunction with Tourism New Zealand is developing a 'Tourism Narrative' project, which includes helping local businesses tell their stories.
- TIA is a key partner in NZTA's Visiting Drivers project to reduce the number of accidents by visiting drivers.

#### TOURISM INDUSTRY AOTEAROA

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P +64 4 499 0104 [www.tia.org.nz](http://www.tia.org.nz) E [info@tia.org.nz](mailto:info@tia.org.nz)

- TIA leads the Responsible Camping Forum, a group of 40 organisations representing rental operators, industry associations, Local and Central Government working together to manage freedom camping.
- A number of infrastructure initiatives will contribute to addressing social licence issues such as over-crowding.

*What you as a Local Council could do in regards to social licence concerns:*

- Ensure freedom camping is effectively managed in your region
- Promote the benefits of tourism in your region to the local community

### 16. Sustainable tourism

With the rapid growth achieved in the past few years, the tourism industry is facing the challenges of managing and sustaining growth, rather than generating growth. There needs to be purposeful effort to actively manage the industry for its long term sustainable success.

*What the Industry is doing:*

- TIA has worked with industry and with Government agencies' support to develop a Tourism [Sustainability Commitment](#) (TSC). The Commitment establishes a set of aspirational goals at both an industry and business level across the areas of economic, environmental, host communities and visitor sustainability. Tourism operators are signing up to the TSC and working towards implementing the sustainability commitments within their businesses.



*What you as a Local Council could do to support tourism sustainability:*

- Support the tourism sustainability goal through positive policy and regulatory settings, and funding.
- Sign up the Council or your appropriate agency to the TSC and actively promote the TSC to your local tourism operators.

#### TOURISM INDUSTRY AOTEAROA

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## **17. Protecting and restoring the environment**

Tourism is a highly competitive global industry. New Zealand's environment is our unique selling point, it underpins our 100% Pure New Zealand tourism position and supports many of our iconic adventure and outdoor activities. Data from the International Visitor Survey conducted for the Ministry of Business Innovation and Employment (MBIE) shows that the top factor for influencing visitors to choose New Zealand is our natural landscape and scenery.

New Zealand's natural environmental assets are under threat, including many of our native species, our freshwater rivers and lakes, and our unique landscapes.

*What the Industry is doing:*

- The environment is one of the four pillars of the Tourism Sustainability Commitment. The TSC asks that Tourism businesses actively support and champion ecological restoration initiatives, and that they are measuring, managing and minimising their environmental footprint.
- TIA is a member of the Land and Water Forum and advocates with central government to protect our natural environment.

*What you as a Local Council could do to support our valuable environment:*

- Recognise the economic value of your environmental assets to tourism
- Ensure the Long-term Plan accurately reflects the environmental needs of tourism
- Action the requirements of the National Policy Statement for Freshwater Management as quickly as possible

## **18. Regional Economic Development**

TIA is pleased to see the increased focus on regional development by Central Government.

Regional dispersal is one of the big challenges for the tourism industry, as currently 65% of current visitor spend occurs in the four gateways of Auckland, Wellington, Christchurch and Queenstown. By improving the spread of tourism around the country, we can ensure that many more regions benefit from tourism activity, while relieving pressure on those places with the highest visitor loads. We are strongly supportive of regional development initiatives that encourage and incentivise tourism.

An effective regional tourism partnership relies heavily on a strong and healthy relationship with Local Government and local communities. The regions where tourism is well managed are characterised by strong local leadership and support, and Regional Tourism Organisations (RTOs) and Economic Development Agencies (EDAs) play an important part in this.

TIA is keen to work with you either in partnership with RTOs/EDAs on areas such as regional visitor strategies, or directly on issues such as freedom camping and proposed regional visitor levies.

## **Funding**

19. Tourism funding in this context relates to financial contributions provided through Central and Local government. There are two components to tourism funding – the source of funds and distribution of funds.

### **TOURISM INDUSTRY AOTEAROA**

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## **20.Sources of tourism funding**

International visitors pay taxes and are more than paying their way. TIA believes these taxes, including the border clearance levy and \$1.5 billion a year in GST, need to be taken into account when additional charges on visitors are contemplated.

Tourism businesses support regional tourism activity through general and targeted rates, regional marketing alliances and their own marketing efforts.

There are infrastructure funding issues at a local government level, especially in regions with small ratepayer bases. Central government assistance is desirable in some cases and there are opportunities for greater user pays and better use of council balance sheets.

Any new funding models contemplated need to be fair and applied nationally. A strength of the New Zealand tax system is its simplicity. Ad hoc taxes on visitors or tourism businesses at a local level are undesirable.

## **21.Distribution of tourism funding**

Central government funding support for local mixed-use infrastructure provided by local government requires a robust governance and allocation process.

Any form of tourism tax, such as the existing border clearance levy, must be ring-fenced for tourism-related investments, not siphoned off for other purposes.

Regional expenditure on tourism marketing and destination management by local authorities should be consistent with the tourism aspirations of the community and cognisant of the impact that visitor spend has on the wider community including employees and suppliers.

22. New visitor taxes and levies must be debated robustly, with all the issues and options considered. Any form of national or local tourism tax or levy must be fair, efficient and ring-fenced for tourism-related investments. TIA will vigorously resist any poorly designed tax or levy proposals that could tarnish New Zealand's reputation as a country that welcomes visitors.

## **Tourism in the Taranaki Region**

23. TIA is pleased to see the recognition of the value of tourism in the LTP and the proposed significant investment by the Council to further the Taranaki Crossing project.

24. We are supportive of Council's preferred option of undertaking a range of new developments at and linked to Pukeiti, positioning it as a recreation hub for a range of activities, including funding the creation of a new track linking Pukeiti to the coast – a key component of the Mountain to Surf Taranaki Crossing.

25. We are also supportive of the Council's aim to facilitate the continued development and maintenance of Yarrow Stadium and ensure that Tupare, Hollard Gardens and Pukeiti are maintained as regionally significant recreational and heritage amenities.

26. As noted, New Zealand's environment is our unique selling point and our natural environmental assets are under threat, including many of our native species.

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27. We applaud the Council's vision of a Regional predator-free status and as such, supportive for the Council to implement the first three years of a region-wide predator control programme and trialling possum eradication.

28. It is pleasing how the Council continues to get very good results from its comprehensive freshwater monitoring programmes and to see Taranaki's freshwater quality is as good as or better than many other regions.

29. We are supportive of the Council's proposal to commit more resources to freshwater monitoring.

#### FOLLOW UP PROCESS

30. TIA wishes to participate further in any follow-up process, including any formal meetings, to ensure that the potential impacts on tourism are adequately represented.

31. Thank-you for the opportunity to submit on the draft LTP. Any enquiries relating to this paper should in the first instance be referred to Nienke van Dijken, TIA Policy Analyst at [nienke.vandijken@tia.org.nz](mailto:nienke.vandijken@tia.org.nz) or by phone on 04 494 1842.

#### BACKGROUND

32. Tourism for New Zealand is big business as the country's largest export sector. It is a major contributor to the New Zealand economy that will always be here and won't easily go offshore. Tourism takes the lead in promoting New Zealand to the world. The brand positioning built by a vibrant tourism industry has become an important source of national confidence and identity and a front window for "Brand New Zealand". Indeed, the clean and pure offer that is synonymous with New Zealand tourism has been widely adopted and used to promote New Zealand exports in a range of other industries as well.

33. The tourism industry delivers the following value to New Zealand's economy:

- Tourism in New Zealand is a \$99 million per day and \$36 billion a year industry. Tourism delivers around \$40 million in foreign exchange to the New Zealand economy each day of the year. Domestic tourism contributes another \$59 million in economic activity every day.
- The tourism industry directly and indirectly supports 14.5% of the total number of people employed in New Zealand. That means 399,150 people are working in the visitor economy.
- Tourism is New Zealand's biggest export industry, earning \$14.5 billion or 20.7% of New Zealand's foreign exchange earnings (year ended March 2017).

#### TOURISM INDUSTRY AOTEAROA

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## **Appendix 1: TIA Local Government Manifesto 2016**

The following Tourism 2025 actions are the priorities for a stronger local government/tourism partnership. The industry's eight priorities we would like to see from Local Government are:

### **Destination Management**

This is the most important thing councils can do – look after and invest in the quality of your region as a destination.

- Facilitate and enable communities to meet the needs of growing numbers of visitors, as well as residents.
- Identify your unique selling points as a destination and promote them.
- Work with neighbouring communities to attract visitors to the wider region.

### **Infrastructure Facilitation**

With the rapid growth in visitor numbers, we have to invest in essential infrastructure and enable the private sector to develop its infrastructure by delivering efficient planning and approval services.

- Define and plan for the priority infrastructure that meets the needs of visitors as well as residents.
- Examine the regulatory environment applied to tourism operators and other businesses serving visitors, and assess where the compliance burden can be reduced to support increased productivity

### **Events programming**

Events are one of the best tools for encouraging people to visit your community. Use them to your advantage.

- Schedule events (meetings, conferences, sports events and festivals) outside of the peak season to foster off-peak travel activity.
- Attract high value business visitors through the availability of quality facilities, such as convention centres where appropriate.

### **Measuring Visitor Satisfaction**

It is important to understand what your visitors think of your community. If they are happy, businesses can grow. If you know there are areas of low satisfaction, you can address the problems. Without this insight, you can't increase value.

- Track the satisfaction of international and domestic visitors, whether by direct customer feedback or social media, and use this information to address areas of dissatisfaction and deliver ever higher satisfaction levels.

### **Off-peak Marketing**

Help your community to prosper by attracting people to visit throughout the year. This will develop a sustainable tourism industry with more permanent jobs.

- Council-owned or supported marketing agencies (e.g. RTOs, EDAs) build a stronger focus on promoting off-peak travel activity to high value visitors.

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### **Regional Development and Tourism**

Every region wants to grow and tourism can and does support this goal. Tourism complements your community's other industries like wine, horticulture and farming.

- Encourage and incentivise tourism as part of your regional development strategies.

### **Enabling Airport and Port Facility Development**

Great air and cruise links are vital to growing tourism. If your airport or port is council-owned, make sure long-term plans are aligned with industry forecasts. There are long lead times, so you have to think ahead.

- Councils work with local airports to establish and implement long-term and sustainable development strategies.
- Councils work with their port company to ensure cruise tourism is enabled.

### **Sustainable Tourism Positioning**

Every region needs to demonstrate its commitment to look after its economic future and the resources it uses to operate.

- Identify the regional priorities required to develop a sustainable tourism industry across economic, social, cultural and environmental considerations.

By actively pursuing these opportunities, your Council can enable real economic and social gains for their communities.

#### **TOURISM INDUSTRY AOTEAROA**

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## TRC – online Submission form

### Submitter

If you provide a valid email address, your submission will be automatically copied back to you.

### Title

(please choose one) Dr Mr Mrs **Ms** Miss Other

If other, please specify

First name: **Anne-Marie**

Surname: **Broughton**

Organisation (if applicable): **Te Kaahui o Rauru**

Full postal address, including rural delivery and postcode: **PO Box 18,**

**Waverley 4510**

[Postcode finder](#)

Phone (daytime): **06 346 5158**

Mobile: **027 342 3005**

Email address: **anne-marie@rauru.iwi.nz**

I wish to present my submission personally at a hearing scheduled for Monday  
7 May

- Yes
- **No**

### Your submission

Note that your submission and any information you supply as part of it is considered public information and will be available in reports and documents relating to this process, and will be published on our website.

If your submission is lengthy, draft it in a separate document and copy and paste into the appropriate field/s (boxes will expand as required). Alternatively, use the upload buttons to upload your entire submission and any supporting material.

### **Towards predator-free Taranaki**

The Council is proposing to implement the first three years of a region-wide predator control programme, focusing on the Waiwhakaiho catchment, around Mt Taranaki and trialling possum eradication. at an operational cost of \$ 580,000 per year.

Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?

- **Yes**
- No

**Comment:**

- Supportive of progress towards predator-free status and good to see Mounga Taranaki prioritised.
- Request support for pest control in the South Taranaki region, particularly Waitootara.

**Pukeiti/Taranaki Crossing**

The Council is proposing to undertake a range of new developments at and linked to Pukeiti, positioning it as a recreation hub for a range of activities, including funding the creation of a new track linking Pukeiti to the coast – a key component of the proposed Mountain to surf Taranaki Crossing – at a capital cost of \$ 1.439 million in 2018/2019 and \$ 5.9 million over 10 years, plus an operating grant of \$ 3.5 million spread over three years (2019/2020 to 2021/2022).

Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?

- Yes
- No

**Comment:**

- Subject to the full consultation with and support of relevant iwi.

**Other proposed changes**

Tell us what you think of our proposals to:

- Further develop its relationship with Māori, focusing on operational areas.
- Commit more resources to freshwater monitoring.
- Broaden its educational outreach by funding a regional Enviroschools position.

(Note: Changes to arrangements with iwi and hapu, and changes to freshwater monitoring, are driven in part by central Government requirements. The status quo is not an option.)

**Comment:**

- Support the expansion of relationship with Maaori and translation into operational action to enhance kaitiakitanga, including capacity to engage effectively.
- Support more resources to freshwater monitoring, with a request to expand the sites in South Taranaki to provide a better balance of site representation, particularly Waitootara and Whenuakura.

- Support broadening education outreach with Enviroschools, with a request to help facilitate iwi-led environmental education.

#### **Additional comments**

Please tell us your views on any other aspect of the proposed 2018/2028 Long-Term Plan.

#### **Comment:**

- Support Fish & Game submission highlighting the need for improvements to fish passage and culverts and improvements to farm bridges as a potential effluent source.
- Support the development of riparian regulations to achieve final goals with fencing and planting on farms, including looking at riparian requirements on smaller width and depth water bodies.
- Seek the prioritisation of the Freshwater Plan review and development, and encourage use of a similar early engagement model to that used with the recent Coastal Plan.
- Seek additional resourcing to support improvements in swimmability standards in waterways, particularly the Patea, Waitotara and Whenuakura rivers.
- Note limited discussion of climate change and the role of TRC in adaptation and mitigation of the impacts.
- Note the need to prioritise drinking water quality.
- Note concerns held by the iwi regarding seismic testing and mining exploration in offshore areas, and a request for a precautionary approach.
- Highlight that this submission is supported by the iwi's Puutaiao Management Plan.

**Joe Mack**

---

**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Thursday, 5 April 2018 5:13 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

Nigel

**Surname**

Carter

**Organisation (if applicable)**

**Full postal address, including rural delivery and postcode**

P.O.Box 33  
Okato 4348  
Taranaki

**Phone (daytime)**

0272347907

**Mobile**

0272347907

**Email address**

cartersurf@gmail.com

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

No

**Comment**

Not with 1080 or similar poisons

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

**Other proposed changes**

**Comment**

**Additional comments**

**Additional comments explanation**

**Comment**

I think it's time the TRC led efforts to ban the burning or farm dumping of farm plastics waste including bale wrap, instead of turning a blind eye to it, and also to investigate recycling of farm plastic waste.

**Document 1**

**Document 2**

**Document 3**

**Document 4**

**Joe Mack**

---

**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Thursday, 5 April 2018 8:22 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

Nigel

**Surname**

Williamson

**Organisation (if applicable)**

**Full postal address, including rural delivery and postcode**

87A Paynters Ave  
New Plymouth  
4312

**Phone (daytime)**

067771001

**Mobile**

0274443599

**Email address**

nigjac@xtra.co.nz

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

**Other proposed changes**

**Comment**

**Additional comments**

**Additional comments explanation**

**Comment**

The funding for improving cycling and walking infrastructure appears to be \$0, which goes against what the Taranaki Regional Council put forward in the 2007 Walking and Cycling Strategy



- Document 1**
- Document 2**
- Document 3**
- Document 4**

**Joe Mack**

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**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Thursday, 5 April 2018 9:45 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

Andrew

**Surname**

Hooks

**Organisation (if applicable)**

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75 Buller St  
New Plymouth

**Phone (daytime)**

**Mobile**

**Email address**

andrew.hooks@icloud.com

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

A track linking the mountain to the sea is a really exciting idea. With the mountain so close to coast it would be really special to have that connection between Taranaki, Pouaki's, Kaitakes and all the way to the sea. Long term I could even imagine a nature corridor to provide birds safe access from mountain to sea.

**Other proposed changes**

**Comment**

**Additional comments**

**Additional comments explanation**

**Comment**

River water quality is of high importance to me and my family. Some examples: (1) When we camped at Kaipokonui the water quality appeared to be very poor. (2) After swimming in the Waiwhakaiho we walked further upstream and found cows wading in the river just around the next bend. All these 'do not swim', 'do not collect shellfish' signs need to go.

**Document 1**

**Document 2**

**Document 3**

**Document 4**

## Joe Mack

---

**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Friday, 6 April 2018 10:18 AM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

Darryl

**Surname**

Gaudin

**Organisation (if applicable)**

New Plymouth Mountain Bikers Club

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Taranaki Mail Centre  
New Plymouth 4340

**Phone (daytime)**

0279291200

**Mobile**

0279291200

**Email address**

taranakimtb@gmail.com

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

The New Plymouth Mountain Bikers Club (725 members 2017) would support any construction of sustainably designed trails that are open to mountain bikes within and around Pukeiti. With our high family membership, we see the construction of trails like these not only as a huge benefit to tourism

with local, national and international visitors. But the perfect opportunity for anyone to explore, learn and enjoy this unique and diverse area through stories of the past.

It is great to see that the council is adopting the ideas of other proposed large scale tourist projects in its plans and in the construction of these trails.

**Other proposed changes**

**Comment**

Opening up national parks to mountain biking with sustainably designed trails does more than good than harm to the environment. We have seen that over 95% of mountain bikers would prefer to ride through these areas to explore and enjoy. At least half of these are families groups that are simply riding for fun and fitness. There is great opportunity for school groups to share as they learn about this environment. With greater access in these areas, then less resources would be needed for freshwater monitoring. But above all, access into these areas, with the assistance and guidance of local Iwi would further develop the relationship with Māori, through their own stories of the area.

**Additional comments**

**Additional comments explanation**

**Comment**

**Document 1**

**Document 2**

**Document 3**

**Document 4**

## Joe Mack

---

**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Friday, 6 April 2018 12:16 AM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

Adrian

**Surname**

Lobb

**Organisation (if applicable)**

**Full postal address, including rural delivery and postcode**

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Stratford  
4332

**Phone (daytime)**

021342587

**Mobile**

021342587

**Email address**

adrian.lobb@gmail.com

**I wish to present my submission personally at a hearing scheduled for 7 May**

Yes

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

No

**Comment**

My submission is related to the planned Kaitake Trail.

I am in favour of developing some significant trails that allow Taranaki to participate in the economic benefits accruing across the country from the New Zealand Cycle Trail Nga Haerenga.

The proposed Kaitake Trail appears to be short on alternatives and comparative benefits relative to other potential trails. The benefits appear to centre on the investment already made in Pukeiti and the NPDC. I don't see from the documentation how it delivers more benefit to the wider Taranaki region than other some other options might present.

The consultation document mentions Tapuae Roa, but it seems to emotionally commit a project between NPDC and TRC before the Tapuae Roa action plan is delivered. Hopefully this was just a timing thing, and not the two large organisations gazumping the Taranaki Economic Development vehicle. Coincidentally submissions close the same day as the Tapuae Roa action plan is to be delivered.

From the Regional Council's plan I would prefer to see a full breakdown of how the option of a New Plymouth focused trail compares to a Taranaki wide view of a trail around the mountain, and other possible options.

I am aware of significant work that has gone into a trail around the mountain that, if built, would put Taranaki up there among the best trails of Nga Haerenga. The economic benefits of such a trail would be embraced by the towns that surround the mountain. Spreading benefit throughout the region and enhancing the time spent in the region by visitors. Consider a trail that offered in no particular order:

- Geographic views from the boundary of the national park. Ring plain, hill country and volcanic features.
- Cultural story telling throughout significant trail segments.
- Interaction with histories around the mountain.

Eight Iwi histories

European settlement, Land wars

Dairying, Oil and Gas

- Flora and fauna that changes as the journey progresses.

My personal view is that a trail of this nature could rank as one of the top rides in New Zealand. It would attract visitors spending between 1 and 5 days exploring the trail. These visitors would range from the adventurous self-supported, to the fully catered higher spending categories. If the other top trails are a guide 70,000 to 100,000 visitors per annum is not an unreasonable starting estimate.

This would incorporate a connection to Pukeiti and would deliver benefits region wide. It is likely that trail around Taranaki would draw larger numbers of visitors through New Plymouth than a New Plymouth centric trail, as currently proposed, could deliver alone.

I am not against the development of the Kaitake trail per se. However I believe there is a stronger business case for the region to go around the mountain, rather than prioritising a New Plymouth only option.

I would recommend the TRC consider seriously the benefits of a destination ride ahead of the incidental benefits of a day ride.

### **Other proposed changes**

#### **Comment**

#### **Additional comments**

#### **Additional comments explanation**

#### **Comment**

#### **Document 1**

#### **Document 2**

#### **Document 3**

#### **Document 4**

## Joe Mack

---

**From:** Clive Neeson <clive.neeson@xtra.co.nz>  
**Sent:** Thursday, 5 April 2018 5:26 PM  
**To:** info  
**Subject:** Long-Term Plan submission.

**Submission by: Clive Neeson,**

**67 Messenger Terrrace, Oakura**

**Mobile 021448324.**

**In addition to the submission below, I request a time to talk on this issue.**

### **Regarding the proposed Bike/walking Trail for Pukeiti:**

As long time local of Oakura, Ive presented Taranaki eco-adventure to millions of adventure travellers in Australia, Europe and North America with big cinema events:

<http://lastparadisefilm.com/photos/screening-it/>

Since 1990 I have been actively involved in the promotion and development of a vegetated bike/walk coastal trail from Oakura to Fort St George with the overview that it provides a wonderful link to Pukeiti via Petone Road and back down Koru Road. Thus far, we have organised the construction the two vital pedestrian bridges at Ahu Ahu road, (across Whenuariki stream) and at Weld road (across Timaru stream).

We also began the native tree vegetation of the path between Oakura and Weld Road in late in 1990 due to awareness that European cyclists in the late 1980's had abandoned New Zealand as a cycle destination because of main road traffic, harsh sun and wind exposure as most European cycleways are in forests or vegetated side-roads.

Our Oakura Coastal pathway project was presented with an environmental award by TRC in 1998. Despite being heavily used as far as Weld Rd, the vision for the loop to Pukeiti and the urgency to complete the coastal link to Fort St George (including a boardwalk around Weld Rd headland) has dwindled.

During the 1990's the bridges provided a fantastic and unique Ocean-to-Mountain link which enabled lunch/teabreak at Pukeiti and an amazing downhill vista on return which we once cycled on a regular basis but as we age, the long detour up Greenwood Road has made it more difficult.

Oakura has established world recognition for its "mountain to sea" experience without the use of cars which is the theme that tourists are now chasing:

<https://youtu.be/mG3iqnXaapo>

Our research shows that tourists are looking for this unique point of difference (Mountain to Sea) ie, an experience which demonstrates WHY Taranaki is like NO OTHER, rather than trying to imitate other enviable attractions like the Tongariro crossing. The Pukeiti coastal LOOP track would be the perfect



mountain-to-sea experience . This seems to have been overlooked in funding and promoting of the vital coastal link.

With the advent of battery assisted mountain bikes, this sea to mountain loop has the potential to provide the greatest visitation to Pukeiti by an older demographic who are seeking one-day cycle trips with lunch break in the park and minimal motor vehicle usage.

The proposed new link from Oakura to Pukeiti will mean that instead of using Koru Rd as return, we will now be under bush cover for the long hot slog uphill and will completely avoid having to use the dangerous main highway 45. It should be noted that the loop would be done in the clockwise direction, where the uphill push to Pukeiti will be done in cooler shade and the downhill leg will take advantage of the sweeping open vistas of Petone Rd. With the regenerative braking of modern electric bikes, the battery is adequately recharged on the downhill run sufficient for powering the last leg along the coast back to Oakura Village. It therefore should be realised that the track will be heavily used by uphill traffic and needs to be designed as 2 way and in a way to discourage the dangerous situation which has developed in the Kaitake hiking track (extending from upper Wairau Rd into the National Park) whereby the braking of extreme downhill mountain bikers have severely damaged the walking surface with high speed downhill runs.

There is much tourist Air B&B accommodation in Oakura plus a growing local population for whom this loop would be attractive because it is door-to-door without the use of vehicles and shuttles.

For the above reasons I therefore propose to TRC as funders of the project:

1. That the beginning and end of the trail be in Oakura village, utilising a long-envisaged nature link along the Oakura river to Corbett Park rather than encouraging shuttle traffic up to carpark facilities on Surrey Hill. Village-based cyclists will have to contend with this traffic which will diminish the experience.
2. That Pukeiti pathway project funding also be used to assist the small completion budget required for completion of the Oakura-Fort St George link so that Pukeiti visitation can be boosted by this long awaited loop trail.
3. That the project be developed to the benefit of the Oakura community also, such that Pukeiti loop will appeal to Oakura community and resident eco-tourists who favour door-to-door cycling without assistance of motorised shuttles.
4. That the main pathway designed to be safe for uphill cycle and walking traffic and discouraging high speed downhill runs.
5. That the necessary land/swing bridges be installed so that the lower end of the path be at Corbett Park and/or utilise the unique nature experience along the Oakura River rather than encouraging motorised shuttle traffic up Surrey hill road.

Clive Neeson

"LAST PARADISE"

Winner of 2018 LUX tourism Award.

"Best of Banff" Banff Mountain film festival

## Joe Mack

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**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Friday, 6 April 2018 11:25 AM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

Stuart

**Surname**

Trundle

**Organisation (if applicable)**

Venture Taranaki Trust

**Full postal address, including rural delivery and postcode**

PO Box 670  
New Plymouth 4340

**Phone (daytime)**

06 759 5150

**Mobile**

021400700

**Email address**

ceo@venture.org.nz

**I wish to present my submission personally at a hearing scheduled for 7 May**

Yes

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

We note that this programme of work supports the long term goal of a predator-free Taranaki. In the shorter term the reduction of predators in specific areas of Taranaki is also beneficial. The positive biodiversity outcomes from this predator reduction programme also increases the appeal of Taranaki as a visitor and lifestyle destination.

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**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

## **Comment**

The Council's recent investments in Pukeiti have attracted more visitors to the region and encouraged them to stay longer. Further developments at Pukeiti and the associated Kaitake Trail to Oakura create opportunity for further visitor growth as well as providing recreational and lifestyle assets of appeal to locals.

These assets will be important in helping the region achieve the targets for visitor growth set in the Tapuae Roa Regional Development Action Plan released in April 2018. The Plan targets 7.5% growth in visitor numbers to the region in the period through until 2025.

The Council's investment in these assets will also help in the process of attracting central government investment to support development of other components of the Taranaki Crossing.

## **Other proposed changes**

### **Comment**

We encourage the Council to further develop its relationship with the iwi of Taranaki on both operational and strategic matters.

We also encourage the Council to broaden funding for the regional Enviroschools programme. Venture Taranaki manages the Curious Minds programme in Taranaki which funds a range of community-based science projects many involving schools. This programme is complemented by Enviroschools.

## **Additional comments**

### **Additional comments explanation**

#### **Comment**

We note that the Regional Council has been closely involved in the development of the Tapuae Roa Regional Development Action Plan. There are many aspects to this Action Plan which the Council may choose to be involved in. The Council is a key contributor to regional development activities in partnership with the region's three District Councils and Venture Taranaki.

The Council is owner of one of the key economic resources of the region – Port Taranaki Limited. We encourage the Council's investment in the Port to be utilised to encourage regional economic development.

The Council plays a key role in regional land transport planning. We encourage the Council to continue its focus on planning for improvements in the region's transport infrastructure. In particular there is further work required on State Highway 3 to the north of New Plymouth and on State Highway 43 between Stratford and Taumarunui.

The Council also supports public transport services in Taranaki. We note that there is likely to be a need for improved transport services into and out of Egmont National Park. Such services may require some public support to get established as the demand for these services is intermittent. We encourage the Council to become involved in planning for such services.

We encourage the Council to continue working with New Plymouth District Council on matters related to bringing facilities at Yarrow Stadium up to appropriate earthquake standards. The Stadium is a key asset for hosting events in Taranaki and it is important that it is returned to full functionality as quickly as possible.

## **Document 1**

## **Document 2**

## **Document 3**

## **Document 4**

# TE RUNANGA O NGATI RUANUI TRUST



74 Princes Street  
P O Box 594, HAWERA  
Phone: 06 278 0148 Fax: 06 278 1358  
Email: gml@ruanui.co.nz

6 April 2018

2018/2028 Long Term Submission  
Chief Executive  
Taranaki Regional Council  
Private Bag 713  
STRATFORD 4352

Taranaki Regional Council  
Document No:

12 APR 2018

Document No of Reply:

Tena koe Basil,

## RE: Submission 2018/2028 Long Term Plan Taranaki Regional Council

Te Runanga o Ngati Ruanui Trust (Ngati Ruanui) welcomes the opportunity to provide a submission on the Council's 2018/2028 Long Term Plan (the plan).

Ngati Ruanui acknowledges our previous submissions and the changes adopted by the Council that have resulted in the current direction and layout of the plan.

Overall Ngati Ruanui supports the intention and direction of the plan and in particular the section outlining the Council's approach "Working Together with Maori".

Managing water quality and improvements into the future is a significant area that the Council and tangata whenua must collectively work together.

During the life of the plan water use and the standards applied will likely become more challenging including the impact on land management. Ngati Ruanui believe the plan could better reflect these future challenges by providing more explicit reference to the partnership that will need to be fostered with tangata whenua. Significant changes will also be occurring with the governance and management of Maunga Taranaki which could also impact on the source of many rivers and how water is managed. In effect the plan should start to signal meaningful partnerships that will need to occur.

### **Ngati Ruanui recommends that additional paragraphs be added to the section "Freshwater quality" on page 5:**

***"The Council intends to work closely with iwi and hapu of the region to develop the Fresh Water Plan recognising the kaitiakitanga role of tangata whenua and the need to secure a long term partnership which will further benefit freshwater quality"***

***"The Council also recognises the likely changing role iwi and hapu may have in freshwater management and acknowledges the need for engagement and active involvement in freshwater water decision making throughout the life of this plan."***

# TE RUNANGA O NGATI RUANUI TRUST



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In respect of the statement on page 5 "Working with iwi and hapu" while acknowledging work of the Taranaki Mayoral Forum Ngati Ruanui does see the need to specifically tie increasing capacity to the forum. **Ngati Ruanui recommends the following:**

***"The Council is working with iwi to find the best way to make progress; this has involved work with the Taranaki Mayoral Forum. The Council is committed to working further with iwi and it is most likely....."***

As noted above Ngati Ruanui supports overall the section of the plan titled "Working Together with Maori". A number of minor amendments are suggested to assist in the continued strengthening of the relationship between Council and Maori; this recognises the evolution of the relationship to date and the relationship before us. **Ngati Ruanui recommends the following:**

***"Policy development"***

***"Provide opportunities to involve and actively engage Maori in major policy decisions ....."***

***"In carrying out these steps the Council will (new bullet point):***

- ***"Provide time to meet kanohi ki te kanohi (face to face) on major policy matters with iwi organisations where relevant"***

***"Resource consent process"***

***"In carrying out these steps the Council will"***

- ***"encourage applicants to consult where Maori may be an interested and/or affected party, as part of an assessment of environmental effects"***

It is likely that iwi organisations are now at a point where their engagement and ability to engage in environmental monitoring is greater. In this respect the statement relating to environmental monitoring should now be worded in a more pro-active stance to better reflect more robust engagement and involvement. **Ngati Ruanui recommends the following:**

- ***"Develop an active approach to ensure the participation of maori in resource consent monitoring, including input into the design of monitoring programmes and specific measures for involvement in monitoring activities and plans"***

On page 27 Ngati Ruanui notes a list of specific community outcomes, none relate to Maori; **Ngati Recommends that the following:**

***"Specific community outcomes"***

- ***"An active partnership relationship continues to be developed with Maori, Iwi and hapu"***

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On page 33 under the section relating to monitoring and reporting **Ngati Ruanui recommends that a new bullet point is added as follows:**

- ***“With iwi and hapu - to ensure cultural and kaitiaki responsibilities are incorporated into reporting and monitoring where relevant”***

On page 45 ‘Levels of service’, 3 “Maintenance and enhancement of overall water quality in our rivers and lakes, groundwater and coastal waters” **Ngati Ruanui recommends that the following measure is included:**

***“Measure: cultural health indicators to show trends or changes in the health of water quality”***

***“Target (Years 1-10) - Improvements in the cultural health indicators established as part of the baseline 2019/20.”***

***“Baseline: Cultural health indicators are developed in 2019/20 to provide a guide as to the cultural health of rivers and lakes, groundwater and coastal waters as consulted with iwi and hapu of the region.”***

Long Term Plans represent future directions and aspirations. These plans also need to signal changes in management and approach and can be bold with a vision moving ahead. Ngati Ruanui considers that the Regional Council has made good progress at leading change; with inclusive policy and developing strategic direction that include a partnership and relationship with Maori. Our recommendations maintain the good work started and provide the next steps at assisting in securing that partnership.

Ngati Ruanui does wish to be heard in respect of its submission.

Ngā mihi,

**Debbie Ngarewa-Packer**  
Kaiarataki

# SUBMISSION

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**To:** TARANAKI REGIONAL COUNCIL

**From:** TARANAKI FEDERATED FARMERS

**Submission on:** 2018/2028 Long-Term Plan

**Date:** 3 April 2018

**Address for service:**

Dr Lisa Harper  
Regional Policy Advisor  
Federated Farmers of New Zealand  
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### *Introduction*

Taranaki Federated Farmers appreciates this opportunity to submit on the draft Long-Term Plan. We also value the annual effort undertaken by Council's Corporate Services Director, Mike Nield, to meet us to discuss the draft Plan.

Federated Farmers thanks Council for the excellent financial management shown in the past. We support Council's continued focus on core business and expressed intention to keep free of public debt and rate increases to a minimum.

### *Rating & financial policies*

We note that Council is proposing a 3.5% average increase in the general rate this year and for the next three years, with average increases of 2.8% per year over the life of the Plan.

We have supported the low rates increases of previous Annual Plans, averaging <1% per year. The current proposal will be seen by farmers as a watering down of this approach and is strongly opposed. With largely static incomes and rising costs, farmers tell us that the best thing that Council can do for them is to continue keeping rates increases as low as possible. If Council has money in the bank, they would rather it stayed there or were used to buffer rates increases; this will help support local businesses and their communities.

- We oppose the current proposed rates increase of 3.5% per year and submit that the previous approach of keeping rates increases below 1% per year be continued.

We support Council's use of targeted rates, where the beneficiary can be identified. The Federation also advocates for the use of the UAGC at its maximum 30% of total rates revenue, as a fair way of paying for services that benefit all equally. We do not support use of fixed charges per SUIP, as farmers end up paying multiple times, with every staff house or shearers quarters (whether currently in use or not) subject to a fixed fee.

We note and appreciate Council's efforts at transparency within the Plan e.g. policies, revenue and finance sources for different council activities are neatly and clearly summarized (pp.114-118).

### *Pukeiti & the Taranaki crossing*

The funding of a walking trail from Pukeiti to Oakura and the addition of new tracks, hut and look-out are worthy in themselves. But at more than \$10m over the life of the Plan, they are a significant expense and are not supported.

Last year, we endorsed Council's plan to replace the lodge at Pukeiti, on the grounds that replacement was considered preferable to refurbishing the original building, for reasons of cost and risk.

The difference between last year's proposal and the current version is that one in our view represented sensible stewardship of existing assets and the other is far more expensive and comes under the category of economic development activity.



We are generally wary of economic development spending, as we have found that it can be sizable, with sometimes very little obvious benefit. In this case, a solid cost-benefit analysis to support the proposed spending does not appear to have been provided and we struggle to see a connection between building a trail to Oakura and concrete gains for farmers and their rural communities. Depending on how the District Council chooses to fund their part of the spending, North Taranaki farmers may also end up paying twice, through both their regional and district council. A far more detailed argument is required, where the beneficiaries of the expenditure are identified and asked to contribute, if they see benefit from Council spending on their behalf.

If the beneficiaries are primarily the tourism and accommodation sectors (as presumably is the case) the development of the trail and related infrastructure should be paid for by those beneficiaries. Farmers are used to funding their own industry's marketing and development needs and expect other sectors to stand on their own feet as well.

It is critical that Council's role in economic development is clearly defined and based on who is best placed to deliver the desired outcomes in the most effective and efficient manner. In many instances, it is likely that Council's optimal role will be simply to coordinate the development of a shared vision for the region. From Federated Farmers' perspective, Council's key roles include providing an appropriately enabling resource management framework and infrastructure, to ensure that a wide spectrum of business activity is enabled.

- We support the most conservative option of focussing on completion of existing developments at Pukeiti, at a cost of \$900,000 over three years.

#### *Riparian programme*

We are uncomfortable with the idea of changing the model of the riparian programme from voluntary to regulatory. People being what they are, we will always get some who refuse to comply, whether the programme is regulatory or not. The problem is what to do with those who are not taking part. We recognise that with a voluntary programme, options for dealing with these people are limited. But is that enough of a reason to regulate in this case? We do not think so, for the following reasons.

As the saying goes, 'if it ain't broke, don't fix it'. Shifting to a regulatory basis, while it has been framed in the context of picking up the laggards, is a fundamental change to a world-leading programme that has been running on a voluntary model for more than twenty years. And it will affect all farmers in the programme, not just those who are the focus of the proposed change. Our programme is recognised as producing better environmental outcomes than some regulatory programmes that exist overseas. We therefore see no pressing reason to change what is a proven model.

A key concern is that by making the programme regulatory, it will change the feel of the programme for the vast majority, who for decades have been planting and fencing, in partnership with the Council. The last thing we want is that goodwill eroded and participation rates to actually drop.

Some we have spoken to have suggested that all farmers will come on board over time anyway, for example when a property is sold, as the new owner is highly likely to hold the majority view and see the value in riparian management.

In an ideal world, you might regulate the few who are not participating and leave the rest unregulated (as they do not need it). This being impossible, it becomes a matter of weighing up the relative risks of the two approaches.

The risks of keeping the programme voluntary are that a small minority will continue to opt out, for various reasons. Some may say that we should accept that there will always be some of these, regardless of which model we follow. We are more optimistic and believe that with some further thought, we may collectively be able to reduce the numbers of non-participants (few as they are) even further, within the voluntary model. The Federation is keen to work with Council on this, starting perhaps with jointly identifying those who are not taking part, along with their rationale and then targeting initiatives accordingly.

We believe the risks of changing the programme to a regulatory basis are greater and to a degree unknown. A concern is the loss of some of the key benefits that made the programme attractive in the first place. Principle among these is the potential loss of flexibility for the farmer. At the moment, he or she can implement their plan as budgets and other work allow; for some people, costs in time and money are significant (due to the size, shape or topography of the farm, among other factors) and staging the process is the only way to achieve the outcomes wanted.

Another risk is that by regulating, we end up with a more rigid approach that does not work well for those on the margins of the target area and/or whose land has particular challenges. It is one thing for a dairy farmer on the ring plain to fence with a two wire electric fence and plant, but there are sheep-beef and other dry stock farmers involved as well; these in some cases need a tailored approach that the voluntary model is better equipped to deliver.

An example given to us is a 80 hectare dry stock block; the farmers are part of the riparian programme, but express concerns that the next stage of fencing suggested by TRC staff would take a large proportion of the block out of production and there are significant technical constraints due to the steep terrain. Regulation is not the answer to issues of difficult topography – arguably, some properties should never have been included in the programme, but they are and these farmers would be affected disproportionately by the proposed change.

We have had a raft of issues brought to us by farmers who are participating in the riparian programme, but have concerns which should be addressed to ensure its continued successful implementation. We strongly believe that fixing these issues would do more for the overall success of the programme than regulating for a few. They are primarily about where fencing or planting are not considered practical. Some farmers are also questioning the cost-benefit of fences around watercourses that are dry for the majority of time, especially when fences would cut across existing paddocks (making stock access difficult and necessitating costly re-fencing) or remove proportionally large sections of their land (particularly a concern for small farming units).

Federated Farmers would be happy to help with addressing these problems. We have spoken to a number of farmers on the ring plain and everyone wants all those who could participate in the programme to be on board. Ultimately, Taranaki farmers are very proud of the success of the riparian programme and want it to continue in the best way possible.

- We oppose the plan to change the voluntary model of the riparian programme, as we believe that the risks to its ongoing success would outweigh the benefits.

#### *Biodiversity protection*

Farmers know from personal experience that control of predators like possums, stoats, rats and feral cats is an ongoing battle. Introduced predators and weeds remain the main threats that we see to indigenous biodiversity on farm. Future success depends on good engagement with the community and working at increasingly large scale across the landscape. This is already happening in Taranaki, as groups of landowners co-ordinate predator control actions for maximum impact or neighbouring farmers string together individual QEII covenants to create wildlife corridors. Greater support for and co-ordination of these efforts is needed, which is why Federated Farmers continues to support initiatives such as 'Wild for Taranaki'.

Federated Farmers Taranaki therefore endorses efforts to improve predator control at the landscape level in the region. We support Council's planned three-year commitment to increased pest control within the Long Term Plan, including the trial of large-scale predator control in the Waiwhakaiho catchment, and other trials around the Mountain. We note and support that this spending is contingent on gaining co-funding from central government, through its Predator Free 2050 programme.

- We support Council's preferred option of implementing the first three years of a region-wide predator control programme.

#### *Other matters*

We have no specific comment to make on funding of a regional position for the Enviroschools programme.

We note that more spending is proposed to support work with iwi and hapu. As few details are given of what this involves or the costings, it is difficult to make specific comment. We understand that few details may have been provided, because they have yet to be worked out. Farmers appreciate that engagement with stakeholders including Maori is vitally important, but we would appreciate seeing more information (if available) on how rate-payer money is to be spent in this area.

#### *About Federated Farmers*

About Federated Farmers: we are a not-for-profit primary sector policy and advocacy organisation that represents the majority of farming businesses in New Zealand. Federated

Farmers has a long and proud history of representing the interests of New Zealand's farmers. The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

***Federated Farmers wishes to be heard in support of this submission  
Thank you***

## Submission: Long Term Plan 2018-2028 – Taranaki Regional Council

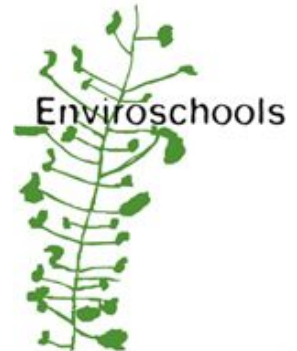
**Name:** Toimata Foundation      **Contact person:** Kristen Price, Operations Manager

**Postal Address:** PO Box 4445, Hamilton, 3247 **Physical Address:** Lockwood House, 293 Grey Street, Hamilton

**Phone:** 07 959 7321      **Email:** kristen.price@toimata.org.nz      We **DO** wish to speak to this submission

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Enviroschools is a holistic framework that supports the development of resilient, connected and sustainable communities. Through Enviroschools children and young people plan, design and implement a wide range of sustainability projects in collaboration with their communities. Nationally over 1,100 early childhood education (ECE) centres, primary, intermediate and secondary schools are part of the Enviroschools network – a third of all schools and 6% of the large ECE sector.



Enviroschools is managed nationally by Toimata Foundation (a charitable trust).

The Enviroschools Taranaki network was first established in 2006. Currently there are 20 schools and 7 kindergartens in the region that are part of Enviroschools – 22% of all schools and 8% of all early childhood education (ECE) centres. While the size of the programme is relatively small compared to most regions, the Enviroschools network is doing some great work and there is huge potential to develop this further.

### ***This submission covers the following points:***

We thank Taranaki Regional Council (TRC) for your proposal to broaden your educational outreach by funding a regional Enviroschools position. If this proposal goes through, it will mean that 100% of the regional councils and unitary authorities in New Zealand are supporting their communities to be part of Enviroschools.

#### ***1. Investment needed from TRC to ensure that Enviroschools will be effective in Taranaki:***

The investment needed has three aspects:

- a) Enviroschools Regional Coordination role (included in draft LTP)
- b) Budget for Enviroschools events and projects
- c) Budget for Enviroschools Facilitators

We are proposing two alternative investment levels for consideration by council (page 4).

#### ***2. Enviroschools is a proven programme specifically designed to meet multiple Local Government outcomes...Enviroschools can contribute in a range of ways to “Our Future Taranaki”:***

We acknowledge that extending education outreach forms part of the “Our Future Taranaki” picture. Investing in developing the Enviroschools network in your region can also contribute to:

- Biodiversity Protecting – towards a predator-free Taranaki
- Freshwater Health
- Connection with Māori

#### ***3. The Enviroschools implementation model provides value for council partners***

Creating sustainable, resilient communities involves bringing together many different skills, perspectives and resources. The implementation approach and collaborative funding model of Enviroschools provides significant value for councils. It is based on **councils providing cornerstone investment in regional implementation that equates to 20-25% of the total annual investment**, with the balance being funded by other contributors.

*Appended: Key Results from the 2017 Enviroschools Census* - overview for partners

## 1. Investment needed from TRC to ensure that Enviroschools will be effective:

### **Background and Context**

The proven regional delivery model for the Enviroschools Programme is based on partnerships between the regional council and territorial authorities, with additional involvement from community agencies and support from the national team employed by Toimata Foundation.

Regional Councils play a crucial leadership role for Enviroschools in a region and provide resourcing that ensures the effectiveness of the programme. Without TRC playing this role in Taranaki, the programme has in many ways struggled.

The table below shows the financial investment needed from a regional council in context of other partners:

- a) Enviroschools Regional Coordination role
- b) Budget for Enviroschools events and projects
- c) Budget for Enviroschools Facilitators (separate role to Regional Coordination)

<b>Enviroschools Implementation – Roles and Organisations Involved</b>	
<b>Overview of the Roles</b>	<b>Organisations Involved</b>
<p><b>National Hub, providing:</b></p> <ul style="list-style-type: none"> <li>• Strategic direction, innovation and project opportunities</li> <li>• Partnerships between a large number of organisations (90+)</li> <li>• Training, mentoring and educational resources</li> <li>• Research, evaluation and programme development</li> </ul>	<p><b>Toimata Foundation in partnership with Te Mauri Tau</b></p> <p>Employ a national team (8 people) that works closely with regional partners. Some (limited) capacity for financial investment in regions to support key projects and developments.</p>
<p><b>Regional Coordination</b></p> <ul style="list-style-type: none"> <li>• Establish the strategic direction for the region</li> <li>• Maintain and develop partnerships across multiple organisations</li> <li>• Manage and support a team of Enviroschools Facilitators</li> <li>• Provide professional development and networking events for participants (adults and students)</li> <li>• Develop community and/or regional level projects</li> </ul>	<p><b>Regional Councils/ Unitary Authorities:</b></p> <ol style="list-style-type: none"> <li>a) Employ/fund the Enviroschools Regional Coordinator</li> <li>b) Provide budget for resources, events and projects</li> </ol> <p>AND... involve staff across the organisation so that Enviroschools is integrated with organisational priorities and staff expertise is available for community and/or regional level projects.</p>
<p><b>Facilitation for participating schools &amp; ECE centres</b></p> <ul style="list-style-type: none"> <li>• Introduce the programme for new schools/centres</li> <li>• Assist school staff to integrate Enviroschools into the curriculum and operations of the school/ centre</li> <li>• Link schools/centres to local experts to assist with action projects</li> <li>• Support schools/ centres to measure and reflect on their progress and to set goals for the future</li> <li>• Assist Enviroschools to participate in community level or regional projects</li> </ul>	<p><b>Territorial Authorities:</b></p> <p>Contribute funding to the time and expenses of Enviroschools Facilitators to work with their local communities.</p> <p><b>Regional Councils:</b></p> <ol style="list-style-type: none"> <li>c) Contribute funding to the time and expenses of Enviroschools Facilitators. Manage the team of Facilitators.</li> </ol> <p><b>Kindergarten Associations:</b></p> <p>Contribute time of their staff as Enviroschools Facilitators.</p>

## Potential for Growth

### Early Childhood Education (ECE) Sector – plans with Kindergarten Taranaki to double participation

There are 83 English-medium<sup>1</sup> ECE centres in the Taranaki Region.

Nationally ECE is a very large sector (4,650 centres compared with 2,540 schools). Toimata Foundation has developed an approach of working in partnership with Kindergarten Associations. Our approach involves the associations investing time of their own staff members to take on the role of an Enviroschools Facilitator. Associations are supported by the Enviroschools Regional Coordinator and an ECE specialist employed by Toimata Foundation.

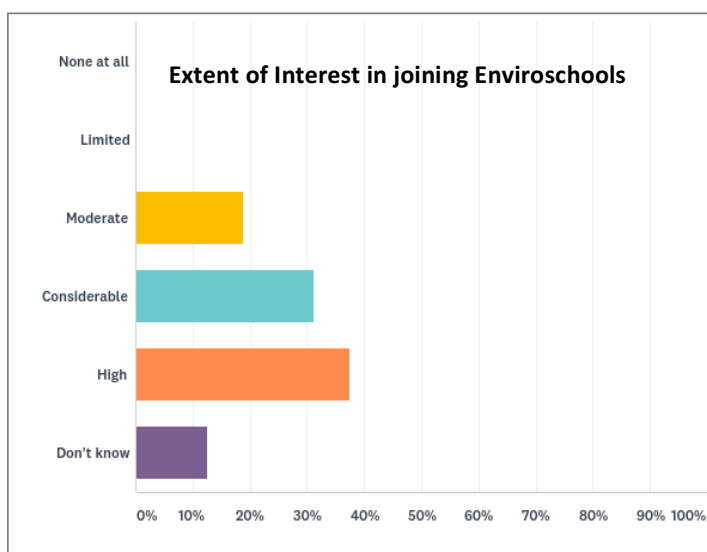
Kindergartens Taranaki (the regional association) have 24 kindergartens (representing 29% of the ECE sector in Taranaki). Currently 7 of their kindergartens are signed up as Enviroschools. Kindergartens Taranaki plan to increase the time allocated to their facilitator so they can double participation in Enviroschools to 14 kindergartens by 2019.

### Schools – there is considerable unmet demand and current underfunding of facilitation

There are 90 English-medium schools in the Taranaki Region. Currently 20 are part of the Enviroschools network. Toimata Foundation undertook an on-line survey of the schools in the Taranaki region that are not involved with Enviroschools (23% response rate). We asked the extent of their interest in joining Enviroschools. This survey, combined with existing anecdotal evidence from enquiries, shows that demand for Enviroschools exceeds capacity.

All respondents to the survey said they supported the Enviroschools Proposal in your 2018-2028 Long Term Plan.

Currently the funding for Enviroschools Facilitators working with schools comes through multi-year agreements with the three district councils in the region. Levels of funding are modest and this stretches resources, especially across a large region where facilitators need to travel long distances.



Toimata Foundation is suggesting the following two options for consideration by TRC:

**Option 1: 30% growth, bring on 6 new schools by 2020**

**Option 2: 50% growth, bring on 10 new schools by 2020**

We would also like to be working strategically with TRC to grow the investment from the district councils over time.

<sup>1</sup> Note: Toimata offers Te Aho Tū Roa for Māori-medium kohanga and kura

**Two Investment Options**

**Option 1 – solid network of Enviroschools with moderate growth (30%)**

	2018/2019	2019/2020	2020/2021
<b>a) Regional Coordination:</b>	Transition to TRC role	TRC role	TRC role
<b>b) Regional Events:</b>	Professional development workshops for teachers and annual networking event involving students		
<b>c) Enviroschools Facilitation:</b>	Recruitment of new facilitators for schools	Team of 3-4 Enviroschools Facilitators	
<b>Number of Enviroschools</b>	20 schools (22%) 7 ECE (8%) <b>= 27 total</b>	23 schools (25%) 14 ECE (17%) <b>= 37 total</b>	26 schools (29%) 14 ECE (17%) <b>= 40 total</b>
<b>Investment other regional partners:</b>	<p><b>New Plymouth, Stratford and South Taranaki District Councils:</b> Funding for Enviroschools Facilitators, total value \$25k per annum.</p> <p><b>Kindergartens Taranaki:</b> Time of an in-house Enviroschools Facilitator (planning to increase the size of this role over time)</p>		
<b>Investment TRC:</b>			
<b>a) Regional Coordination Role</b>	0.5 FTE (\$44,000)	0.5 FTE (\$44,000)	0.5 FTE (\$44,000)
<b>b) Regional Projects &amp; Events</b>	\$2,500	\$5,000	\$5,000
<b>c) Facilitation Team</b>	\$12,500	\$25,000	\$25,000
	<b>=\$59,000</b>	<b>=\$74,000</b>	<b>=\$74,000</b>

**Option 2 – growing network of Enviroschools (50%) with development of regional scale projects**

	2018/2019	2019/2020	2020/2021
<b>a) Regional Coordination:</b>	Transition to TRC role	TRC role	TRC role
<b>b) Regional Projects &amp; Events:</b>	Professional development workshops for teachers, annual networking event involving students		As left, plus begin development of regional scale project
<b>c) Enviroschools Facilitation:</b>	Recruitment of new facilitators for schools	Team of 4 Enviroschools Facilitators	
<b>Number of Enviroschools</b>	20 schools (22%) 7 ECE (8%) <b>= 27 total</b>	25 schools (25%) 14 ECE (17%) <b>= 39 total</b>	30 schools (29%) 14 ECE (17%) <b>= 44 total</b>
<b>Investment others:</b>	<p><b>New Plymouth, Stratford and South Taranaki District Councils:</b> Funding for Enviroschools Facilitators, total value \$25k per annum.</p> <p><b>Kindergartens Taranaki:</b> Time of an in-house Enviroschools Facilitator (planning to increase the size of this role over time)</p>		
<b>Investment TRC:</b>			
<b>a) Regional Coordination Role</b>	0.5 FTE (\$44,000)	0.5 FTE (\$44,000)	0.6 FTE (\$52,800)
<b>b) Regional Projects &amp; Events</b>	\$2,500	\$7,500	\$15,000
<b>c) Facilitation</b>	\$12,500	\$30,000	\$30,000
	<b>=\$59,000</b>	<b>=\$81,500</b>	<b>=\$97,800</b>



## **2. *Enviroschools is a proven programme specifically designed to meet multiple Local Government outcomes...***

The Enviroschools Programme was first developed by councils in the Waikato region. It is specifically designed as a programme that empowers children, young people and their communities to take action that addresses a wide range of the key outcomes that councils are also seeing for their communities.

Nationwide, **81% of councils are currently part of the Enviroschools network**. This is made up of:

- 94% of Regional Councils and Unitary Authorities
- 77% of Territorial Authorities

Toimata Foundation has undertaken a 5-year research and evaluation programme with external evaluators Kinnect Group. This has involved two national censuses (2014 & 2017), return on investment analysis and a comprehensive evaluation drawing on multiple sources. Highlights from the research:

- Participating schools and centres are **highly engaged in a wide range of environmental actions and sustainability practices**.
- Evaluators found that Enviroschools is “a very high-performing programme”<sup>2</sup> that provides a **broad range of outcomes** covering environmental, social, cultural, education and economic aspects.
- **11% Return on Investment (ROI)**. While only a small number of the outcomes can be monetised, so results are conservative, expert analysis showed a ROI of 11% per annum.

### ***...Enviroschools can contribute to ‘Our Future Taranaki’ in multiple ways***

#### **Vision for Predator Free Taranaki**

- Across the country Enviroschools are already working with their communities on pest-free initiatives. *27% of Enviroschools are involved in controlling animal pests (trapping etc.)*.

#### **Connecting with Māori**

- *Valuing and integrating Māori Perspectives* - within schools and kindergartens, in Enviroschools resources, at Enviroschools events, throughout learning and action - *is a guiding principle of the Enviroschools kaupapa*.
- *99% of Enviroschools are involved in cultural sustainability actions and practices*.
- *Participants place substantial value on the Māori Perspectives aspect of Enviroschools – 86%*<sup>3</sup>

#### **Managing Freshwater Health**

- *83% of Enviroschools are active in looking after water health and water conservation*
- *WaiRestoration* is a project that was co-developed by Northland Regional Council, Toimata Foundation and numerous community partners. WaiRestoration is an innovative approach to restoring waterway health and biodiversity that brings together the energy of young people, educators, farmers, kaumatua, scientists and many others. Other regions are now exploring how they might develop similar approaches.

\* Percentages above are from the 2017 Enviroschools National Census



<sup>2</sup> Page 4, The Enviroschools Programme: Evaluation Report, Kinnect Group, 2015

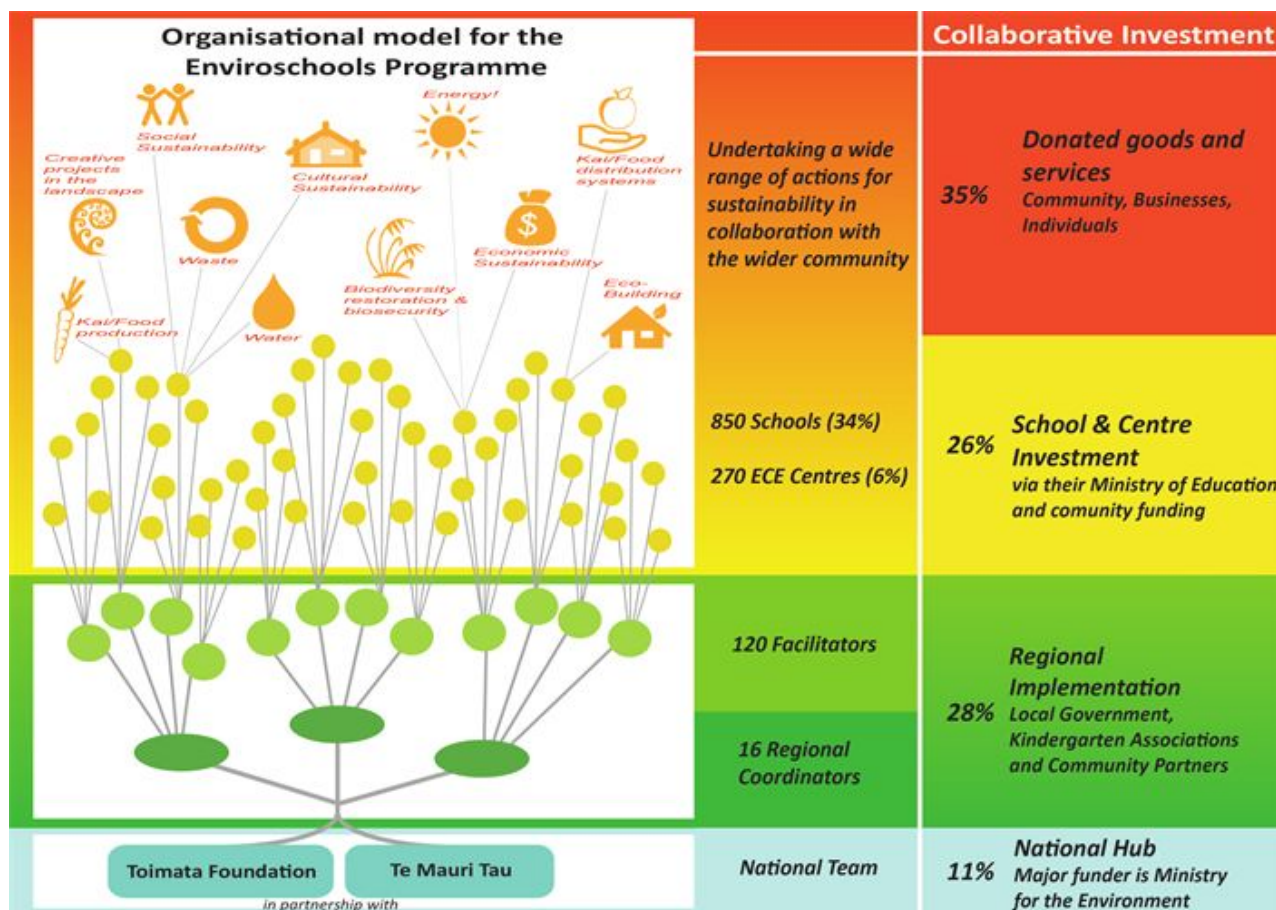
<sup>3</sup> Total % of respondents who rated the degree of value as ‘moderate’, ‘considerable’ or ‘high’ (ratings 3, 4 & 5 on a 5-point scale)

### 3. The Enviroschools implementation model provides value for council partners

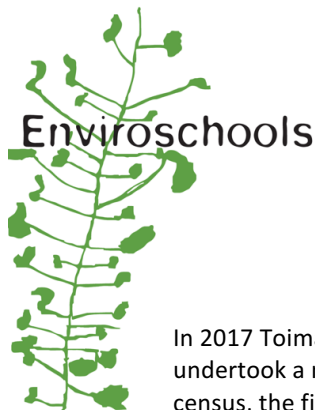
Creating sustainable, resilient communities involves bringing together many different skills, perspectives and resources. The complex environmental, social, cultural and economic challenges facing us today call for a holistic response from a range of different people and organisations working together. Key aspects of the Enviroschools model are:

- **A focus on connecting with, and working, with the wider community.** This results in a substantial level of support from businesses, community organisations and individuals providing donated goods, volunteer time, advice and expertise to the Enviroschools network.
- **Commitment from schools and centres investing their own resources** including staff time, project costs and capital investments. This resourcing comes principally via Ministry of Education funding.
- **Role of the Enviroschools Facilitator** – unlike many programmes in schools that deliver key messages to children in a classroom setting, Enviroschools Facilitators work principally with adults – teachers, caretakers, school management, community members etc. – supporting them to develop their knowledge of sustainability and integrate it into how they undertake their roles.
- **Collaborative approach to regional implementation** with Enviroschools Regional Coordinators and Facilitators are funded by/employed by over 90 organisations - Local Government/Councils, Kindergarten Associations and other community agencies.
- **Toimata has solid support from Central Government** through Ministry for the Environment for our work as a national hub – providing a wide range of support and ongoing programme development.

The graphic below shows the organisational model and the percentage investment provided by different groups for the different aspects of Enviroschools. The percentages are from analysis undertaken in 2014/15 and based on a total annual investment in the programme of \$10.4 million.<sup>4</sup>



<sup>4</sup> Model information and monetary values are from The Enviroschools Programme – Return on Investment Scenario Analysis, Kinnect Group, 2015



## Key Results of the Enviroschools Nationwide Census 2017 Overview for partners - March 2018

In 2017 Toimata Foundation, the national support organisation for the Enviroschools Programme, undertook a nationwide census of the Enviroschools network. This was the second nationwide census, the first was in 2014. In both census projects, Toimata has worked with external evaluators and engaged a specialist advisory panel to ensure a highly robust process. Both census had high response rates and have provided a wealth of valuable information for reporting purposes and for ongoing programme development.

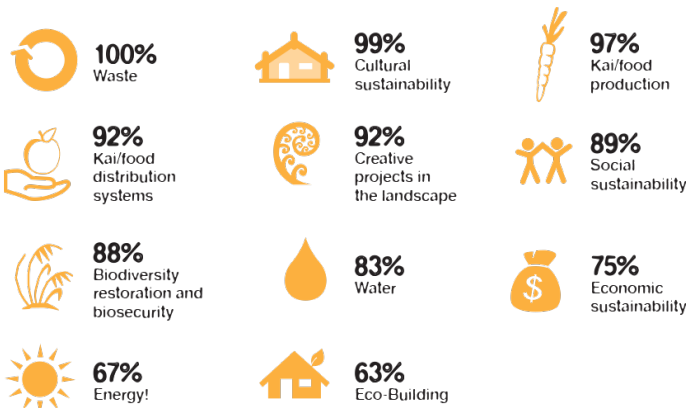
We have produced this initial results overview of the 2017 Census to share with our partners in Central and Local Government. Further reporting will be undertaken in the coming months.

### There is significant nationwide reach through a large number of active participants and a focus on collaboration with the community

- **1,100 + Enviroschools** - schools and early childhood education (ECE) centres, representing 34% of schools and 6% of the large ECE sector.
- Actively participating are **153,000 children & young people**, supported by **15,700 school and centre staff** - teachers, caretakers, administration staff, principals, boards of trustees.
- **Reach is growing** – around 50% more children & young people and over 1.5 times the number of adults actively participating compared to 2014.
- **Strong commitment** – high response rate to a comprehensive questionnaire
- **88% are connecting with other organisations in their community** - councils, restoration groups, Iwi, landowners, businesses etc.
- Data shows Enviroschools has a substantial positive influence on the degree of **interaction with families/whānau and the wider community**.



### There is a wide range of action for sustainability - environmental, social, cultural & economic



All Enviroschools are engaging in a range of sustainability action areas ...  
...and participating in multiple ways within each action area.

\* Percentages are the total % of participants who are taking one or more actions in the area



## Enviroschools is positively influencing a wide range of sustainability outcomes

The Census asked to what degree participants thought Enviroschools positively influenced 40 different outcomes associated with creating a sustainable world.

In addition to the positive influence on the sustainability of the physical environment, there was also evidence of a positive influence on a wide range of other outcomes. Examples include:

				
<b>Citizenship</b>	<b>Educational</b>	<b>Social</b>	<b>Cultural</b>	<b>Economic</b>
<i>Children and young people initiating and taking action on sustainability issues that are important to them - 74%</i>	<i>Motivation to learn - 84% Teachers collaborating - 77%</i>	<i>Ethics being a key part of people's decisions and actions - 79% Healthy eating and physical activity - 79%</i>	<i>Respecting differing beliefs – 80% Correct te reo Māori pronunciation – 80%</i>	<i>Integration of sustainability into their strategic and operational planning - 71%</i>

\* Percentages are the total % of participants who rated the influence as 'moderate', 'considerable' or 'high' (ratings 3, 4 & 5 on a 5-point scale)

## Key aspects of programme design are valued by participants and contribute to effectiveness

The Enviroschools Programme was intentionally designed to be a long-term journey supported by a collaborative network.

The 2017 Census showed the value participants place on key aspects of the programme's design and the relationship of programme design to the effectiveness of the programme. The aspects of programme design strongly reinforced by the census data include:

- **Student-led action**
- **Support from an Enviroschools Facilitator**
- **Long-term nature of an Enviroschools journey**
- **Integration of Māori Perspectives**
- **Focus on community involvement**
- **Emphasis on participants networking with each other**
- **Links made to global issues**
- **The Enviroschools visioning process**

*We need to prepare students for their future - sustainability is a no brainer, Enviroschools is the only comprehensive programme to address that.*

*Teacher 2017 Census*



## Joe Mack

---

**From:** Graeme Tompkins <graeme@plastoil.co.nz>  
**Sent:** Thursday, 5 April 2018 4:22 PM  
**To:** info  
**Subject:** Long-Term Plan submission - Plastoil Plastic Recycling April 2018  
**Attachments:** Plastoil Recycling Proposal 04.2018.pdf; Brochure Plastoil Australasia Ltd.pdf

Dear Sir/Madam,  
Please find our proposal for Plastic recycling in the Taranaki region. Please feel free to send to NPDC as well as I think Taranaki could be the first 100% plastic recycling region in NZ.

Kind Regards

Graeme Tompkins  
Business Development Manager  
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New Plymouth 4310  
New Zealand



# 2018/2028 Long-Term Plan Submission: Plastic Recycling in the Taranaki Region

5<sup>th</sup> April 2018



“PlastOil is the solution to New Zealand’s Plastic waste problem converting waste into Biofuel” .



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## 1. The Business - Recycling plastic waste to Oil.

### 1.1 Plastic Recycling Overview

Much of the recovered volume is processed overseas and shipped back into New Zealand as consumer goods with additional packaging added. Because recyclable Plastic is subject to demand and price sensitivities – it can result in large amounts of local storage and when that storage is over-capacity it will eventually make its way to Land fill.

The top 3 most commonly recovered plastics are PET (Type 1 – **22%**), HDPE (Type 2 – **26%**), and LDPE (Type 4 – **36%**) – and account for 84% of recovered Plastics. There are very low volumes of PVC (Type 3 – **6%**), PP (Type 5 – **4%**), and PS (Type 6 – **1.5% - 635 tonnes**) recovered, which suggests that a high percentage is being diverted to Landfill.

### 1.2 Plastic Recycling in the Agricultural Sector

Agricultural plastics are burnt easily, but incompletely in an open burning scenario. Incomplete combustion causes a lot of carbon monoxide emissions as well as many other air pollutants. In addition, hazardous by-products can be present in the residual ash and in airborne emissions in the form of heavy metals, dioxins and furans, which are leached into the soil.

Probably the emissions of greatest concern during open burning of agricultural plastics are dioxins and furans, which are particularly formed in instances of low combustion temperatures, such as those associated with open burning. Open burning of agricultural plastics is one of the contributors to these emissions.

Dioxins and furans are a health concern even in very small quantities, being associated with endocrine disruption, heart disease, cognitive and motor disabilities, as well as being a known human carcinogen. Humans can be exposed to dioxins through plants, or through meat, as they concentrate in animal fat. This suggests that the burning of agricultural plastics, and associated dioxin generation, is particularly troubling, as the practice occurs on or near active agricultural land. Further, if the majority of dioxin intake to humans comes from food sources, dioxin emissions from the burning of agricultural plastics has the potential to impact a wide population when they land on feed crops and are concentrated in the bodies of farm animals.

Emissions of other air pollutants associated with open burning of garbage include volatile organics (such as benzene), fine particulate matter (PM10) and poly aromatic hydrocarbons (PAH)(such as





benzo(a)pyrene), and heavy metals. For many of these other pollutants, the principal pathway into humans is directly from inhalation of smoke from burning garbage (C2P2, 2010). This suggests the predominant risk associated with these emissions from the burning of agricultural plastics is borne by the farmer and local community.

## 2 The Process- Recycling Plastic Waste to Oil

Plastoil is a world first, providing an affordable, modular and transportable Plastic Depolymerisation system, designed to process Plastics into a useable and cost-effective Plastic Oil.

The line is fed by plastics that are based on polyethylene (PE, HDPE, and LDPE), polypropylene (PP), and polystyrene (PS). The mixing of these types is free from restriction – this therefore allows for a wide range of feedstocks from both residential and commercial sources. The plant will also accept small amounts of PET and Vinyl, to a maximum 5-10% of the granulated mix (18-36 tonnes per annum).

The Plastoil system is housed in its own container sized enclosure (approximately 40ft) which can be built in place or operate at various locations when containerised and placed on a truck.

This compact design allows for low impact installations and even portability (it is about the size of a 40ft container) – this allows for the recycling solution to go to the waste, rather than the reverse, which puts additional pressure on fuel and infrastructure.

The unique benefit of the Plastoil system is the end product – Plastic Oil. This oil moves the waste stream from just “Recycle” to “Recovery”, ensuring that Plastic is taken out of the environment and re-introduced as a replacement to fossil fuels.

The by-products of production also become a useable resource – such as methane, which can be converted to Electricity (via a Gas powered Generator) or bottled and used in applications such as heating. Water Vapour, CO<sub>2</sub>, and CO are the other outputs. All other outputs fall within the Safer Air Standards, as laid down by the NZ standards.

Processes not only soft plastics (LDPE) but Polypropylene (PP) and Polystyrene (PS) - which are major contributors to landfill volumes.

For every 1kg of plastic, you get approximately 870ml of Plastic Oil – other outputs are water vapour, CO<sub>2</sub> and Methane. The system processes 424,000 kgs of plastic waste per annum, per unit and outputs 336,300 litres of oil.

It takes 1 kW of electricity to process 1 kg of plastic (15 cents). The output can be used to either a) power the unit through a diesel oil generator, or b) be used by the processor to fuel the trucks that bring the waste in, or c) sold. This would lower our reliance on imported fuel and the flow on effects from this approach.



Figure 1 : PlastOil Front of Unit

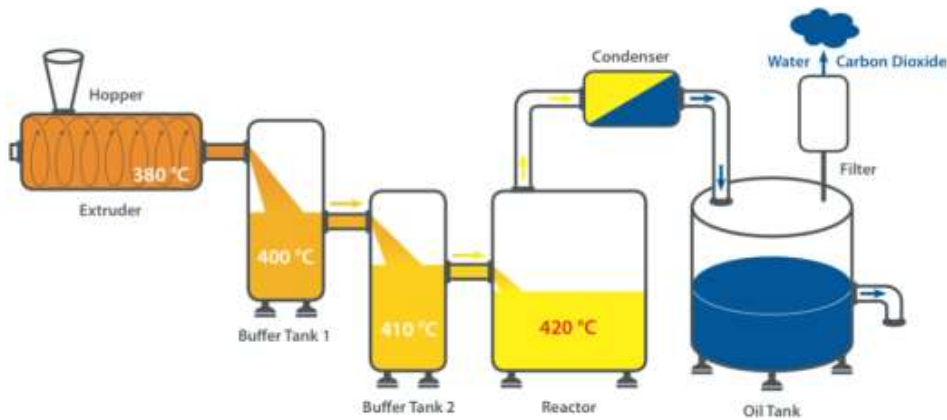


Figure 2: The PlastOil Process schematic.

The POL1 module can process up to 1200 KGs to produce approximately 1000 litres of oil in a 24-hour period.

The Plastoil POL1 is manufactured in Slovakia and meets all International safety and design standards.

POL 2 will be revealed next month as a bigger unit.



## 2.2 The Goal

The Goal is to get the first Thermal Depolymerisation system installed in New Zealand and solving a rapidly increasing problem of managing plastic waste.

We are intending to build a facility to manufacture Plastoil Depolymerisation systems in 2018 for local and export markets.

## 2.3 Social Benefits

Plastoil is the only Modular environment-friendly and quick solution for the disposal of plastic waste with subsequent production and use of plastic bio oil.

Plastoil is a highly ecological method of disposal that produces no pollutants and only a minimum of residual waste. Synergies for Local Bodies, Cities and corporations which addresses some issues in waste management offering an efficient environmentally friendly method.

Reduced transportation of waste plastic, reducing the carbon foot print.

## 2.4 Benefit to the Community

As well as Social benefits to the community the process will create jobs. The plants will require 24hr supervision. The collection of the plastic will generate revenue as well as the Biodiesel produced.

## 2.5 The Plant

The day to day running of the plant, this includes sourcing the waste plastic from their existing commercial customers, supplying the full-time employees and maintaining the plant can be the job of the TRC, or 3<sup>rd</sup> party to an established Environmental Waste Company? If TRC and NPDC decide to increase the plants to handle all plastic recycling in the Region than it would be beneficial to all people in the Taranaki region

Plastoil is happy to help with this under a consulting contract.



*Figure 3: Plastic chipped ready for process*

## 2.6 The Technology

The depolymerisation line uses a considerate, nature-friendly method of processing and adding value to plastic material, in two stages. The first stage includes mechanical crushing or the use of lossless palletisation technology that delivers no strain on the environment, but clean raw materials that are suitable for further processing and use in the low-temperature depolymerisation process. The ground plastic subsequently continues to the thermal depolymerisation process in which the long molecular chains of the plastic are broken down into short chains of oil carbohydrates. While standard pyrolysis is based on heating by flame, the depolymerisation line uses electric arc as the source of heat. This provides the best and stable conditions for depolymerisation, offering higher efficiency to the process, production of zero volume of undesired products (e.g. tar), only a minimum quantity of residual dirt and nearly no air pollutants.

The low-temperature depolymerisation system uses the principle of breaking down molecules of the raw material in temperatures ranging from 270° C to 450° C into simpler polymer chains that can be used in applications in the industry, transportation, power engineering, and other fields. This is unique technology that brings a new approach to use of polymers. The process is not thermal incineration, but low-temperature decomposition of material. The line can process all plastic materials that are based on polyethylene (PE, HDPE, LDPE), polypropylene (PP), polystyrene (PS), used motor oils and hydraulic fluid. The depolymerisation process is friendly to the environment as well as cost effective. It represents an unlimited method for disposal of polymer materials, offering long-term success of the process. The line is designed as a simple set of devices integrated into a container, which is a guarantee of long operating life, easy operation, high mobility and easy installation.

Plastoil will look at building plants in New Zealand in the future as demand grows.



## 2.7 The Costs

### Capital

• Plastoil POL1 , complete turnkey module delivered from Slovakia to Site	\$950,000
• Shredder c/w Magnetic collector and conveyer (Weima WLK800)	\$150,000
• Purpose built building to house shredder and prepared waste	\$250,000
• Infrastructure: Concrete pad, three phase power, internet, site preparation	\$80,000
• Generator	\$15,000
• Oil Storage tanks 20000 litres	\$20,000
• Installation includes Engineers from Slovakia, training,	\$25,000
• Consultant fees and licences	<u>\$50,000</u>
<b>Total</b>	<b>\$1,490,000</b>

### Operational Expenses - Estimated

• Site Rental	-\$10000
• Electricity	-\$500
• Maintenance- material costs of Depolymerisation technology- PC Sum	-\$5400
• Disposal costs of Char	-\$200
• Staff	-\$10400
• Waste plastic	\$109,500
• Biodiesel minus 25% to run generator	<u>\$123,188</u>
<b>Total Yearly Profit</b>	<b>\$206,188</b>

#### Assumptions:

Plastic Waste at zero cost

Output 1000 litre/day x 356 = 365,000 litres @ \$0.45/litre = \$164,250 pa (based on ¾ price of USD Brent Crude) per unit.

Operational life of the Plastoil POL1 is expected to be 20 years with regular maintenance. There is only one moving part, the Auger.

Waste plastic \$300t x 365 = \$109,500



*Figure 4: Plastoil Sample from European Plant*



## 2.8 Plastoil (Australasia) Ltd

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## Materials processed

- All plastic based on polyethylene (PE, HDPE, LDPE), polypropylene (PP), polystyrene (PS)
- Used engine oil and hydraulic fluid



Figure 5: Materials processed.



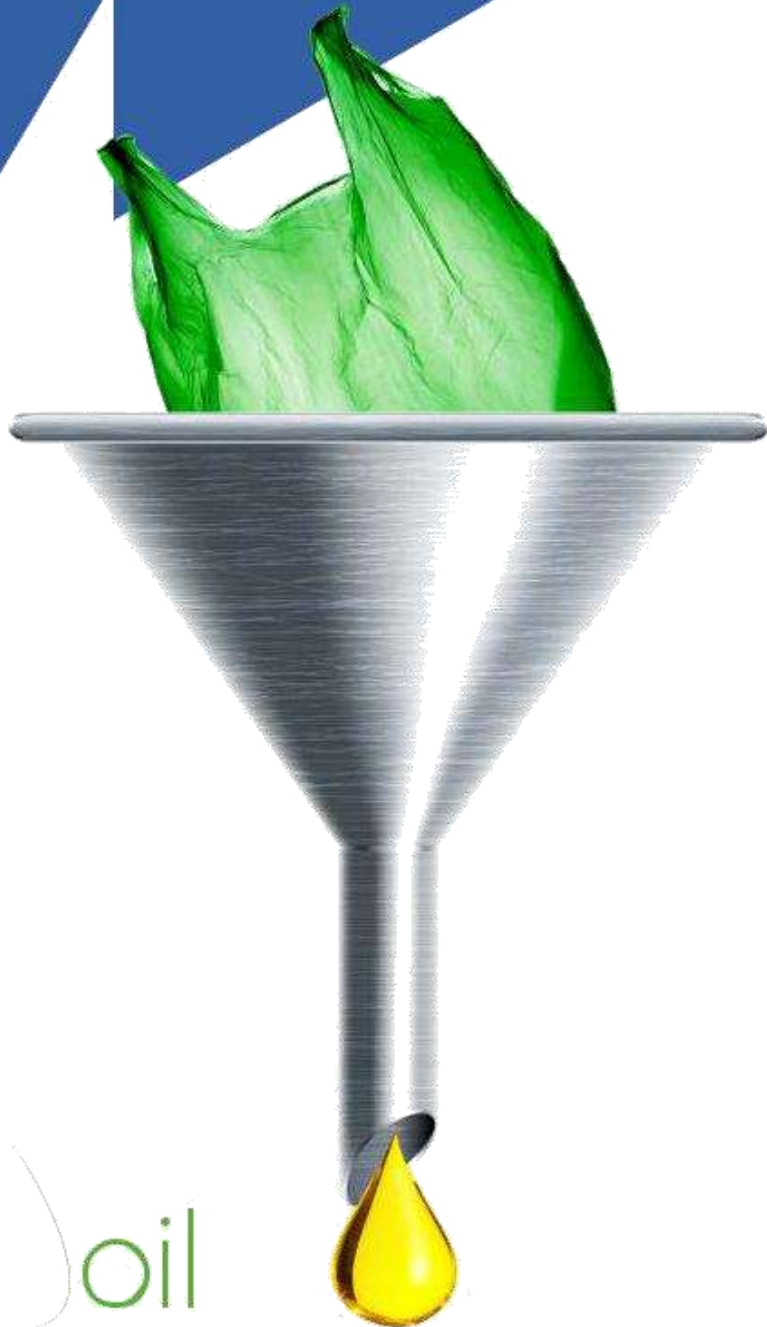
## Plastoil (Australasia) Overview

- Plastoil EU (Parent Company) Slovakia.
- Owned by Active Development Investments 90%, Plastoil (Australasia) 10%
- Plastoil EU was formed in 2014
- Plastoil (Australasia) Ltd is 100% New Zealand owned.
- Paul Wilton (sole Director), Founder and Director of Ecopoint Ltd,
- Ecopoint: Winner of Wellington Gold Awards - Emerging Gold 2004.
- Ecopoint Ltd is a manufacturer and distributor of LED lighting since 2008.
- Ecopoint has a factory in Shenzhen China, with branches and distributors in HK, Australia, Ireland, Denmark and CZ Republic.
- Chairman: Sir Paul Collins, Board Members include David Wale (ex-Chairman NZ Stock Exchange), Brent Wootton
- Graeme Tompkins: Business Development Manager 30 years in Petroleum Industry Worldwide.



Figure 6: Monitoring the Process





plast Soil

Unique technology  
for environment-friendly use  
of plastic waste

## MORE THAN 20 YEARS OF EXPERIENCE

*“We believe that the greatest opportunities lie where unwalked paths lead and that the best investments are those bringing more than material profit. We are nobody’s epigones; we create our own path.”*

**Petr Hodan**  
ADI corp. Chairman of the Board

### What we do

- We run urban heating management and supply heat to thousands of households.
- We build utility networks for major utility companies.
- We help to upgrade electric transmission grids by installing new efficient technologies such as AMT (amorphous metal transformers).
- We upgrade heating management solutions and modernize the current systems using the CHP technology.
- We project renewable source solutions.
- We develop and invest into unique technologies for sustainable development.
- We supply consumption-efficient lighting for industrial companies and municipalities.
- We build residential dwellings as well as housing for the socially disadvantaged.

### Meet our added value:

- Each project is assessed individually according to the client’s actual needs.
- We approach all projects in a holistic way with open mind.
- We always seek synergy in existing technologies and systems.
- We maximize client’s profits and minimize their costs.
- The final solution is always environment friendly.
- We only provide our own developments and solutions.
- We operate our own team of developers, engineers, analysts and energy consultants.
- We cooperate with regional authorities and municipalities.

# PlastOil Technologies

*Over past few decades, consumerism and mass production have become accepted norms that bring an entirely new problem to our life: how to dispose of unprecedented volumes of waste.*

Plastic is a component of waste that is the most difficult to degrade in the environment; yet most plastic waste ends in seas, landfills, or is burned in incinerator plants.

PlastOil POL 1 technology makes use of the process of thermal depolymerization, imitating thus a natural process which completely recycles most of the plastic waste to clean oil that can be used as raw material in the refinery and petrochemical industry.

PlastOil's technologies meets strict European emission standards and environmental regulations.

## Legislative

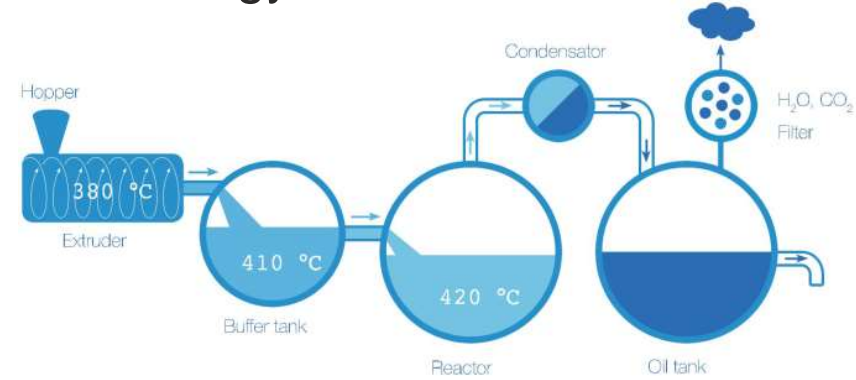
While today 70% of separated waste is still burned or landfilled, the POL 1 technology enables its users to use most of the normal plastic material to help fulfil the obligations of the Czech Republic, the whole of Europe but also China who, together with 196 states, have ratified the so-called "Paris Agreement" in 2015.

Among the obligations stipulated by the Paris Agreement are environment-friendly raw material exploitation, resource efficiency, carbon footprint management and, last but not least, the use of alternative fuels.

ISO 9001; 14001. OHSAS 18001



# Technology Scheme



## Thermal Depolymerisation

While standard pyrolysis is based on heating by open flame, the depolymerisation line uses electric heating belts as the source of heat. This provides the best and stable conditions for depolymerisation, offering higher efficiency to the process, production of zero volume of undesired products (e.g. tar), only a minimum quantity of residual dirt and nearly no air pollutants.

The low-temperature depolymerisation system uses the principle of breaking down molecules of the raw material at temperatures ranging from 270 °C to 450 °C (518 °F to 842 °F) into simpler polymer chains that can be used in applications in the industry, transportation, power engineering, and other fields.

This is a unique technology that brings a new approach to the use of polymers. The process is not thermal incineration, but low-temperature decomposition of material.



# PlastOil Benefits & Solutions

## TECHNOLOGY

We use a unique technological device based on low-temperature depolymerisation (no combustion or incineration) with high efficiency, almost zero emissions and minimum of residue.

## VARIABILITY

The capacity of the process can be easily modified by employing multiple modules, which can be either container-based or installed in a standard plant. The technologies can be easily incorporated into the existing waste management facilities.

## MODULARITY

Container-based recycling process includes several stages from feedstock preparation to final processing into oil. High level of automation with minimal human work requirements and fully remote-controlled process.

## ENVIRONMENTAL and SOCIAL Benefits of the Technology

Our technology offers an alternative to landfilling or incineration of plastic waste. PlastOil contributes to a higher rate of material recycling by processing of non-recyclable plastics into a valuable material, hydrocarbon oil.

## ECONOMIC Benefits

PlastOil is transforming the costs of plastic waste disposal into positive economic value. In other words, owing to our technology, plastic waste generates economic value by transforming itself into the hydrocarbon oil.

# Business Models

**Sale of standalone line for recycling of plastic materials**

1

**Complete solution of plastic recycling by PlastOil:**

- Delivery and/or installation of technology on business partner's premises
- Waste processing and oil trading

**1kg + 1kWh = 1l oil**  
of Plastics      of electric energy



## EXAMPLE OF CONTAINER BASED TURNKEY SOLUTION

### 1.container - peripheral devices

Preparing of plastic waste with capacity of: 300 kg per 1 hour

### 2.container- Technology POL1

Technology for conversion of plastic waste into pyrolytic oil, 1 module produces 1 000 litres /per day.

### 3. container – Pyrolytic oil tank

Storage of pyrolytic oil with capacity of 22.000 liters.

## About PLASTOIL

The parent company PLASTOIL Europe a. s., which is behind the project, is a joint venture of investors and managers from the Active Development Investments group and specialists in chemical and general engineering.

For seven years, we have been investing in the development of this unique project. We have already completed the development stage, and today, PlastOil technology is ready for commercial use including complete service and consultancy. Plastoil Australasia Ltd, is ready for your business now.

### **PLASTOIL AUSTRALASIA LTD**

Paul Wilton  
Director

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## **Submission on 2018/2028 Long -Term Plan Taranaki Regional Council**

**6 April 2018**

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6 April 2018



## **Appendix 6: Charging Policies**

Charges for Monitoring under the National Environmental Standard for Plantation Forestry (NES-PF) pages 171-172

### **SUBMITTER**

**The Forest Owners Association Incorporated (FOA)** is the representative membership body for the commercial plantation forest growing industry. FOA members are responsible for the management of approximately 1.2 million hectares of New Zealand's plantation forests and over 80 % of the annual harvest. The New Zealand harvest is currently approximately 30 million tonnes per annum, with resource available to increase to over 35 million tonnes over the next five years. Approximately 50% of the harvest is currently exported in log form, with the majority requiring phytosanitary treatment in some form such as fumigation.

**The Forest Owners Association** has a number of members within the Taranaki Region.

There is approximately 20,000 hectares of plantation forestry in the region. This is not a large proportion of rural land use especially in comparison with hill country farming.

FOA was involved as a participant in a government working group in the establishment of the NES-PF.

We OBJECT to the setting of the charge. The charge does not appear to be well thought out and in particular the charge is a misuse of the power to be able to fix a charge by proposing a monitoring regime which is not prescribed as a condition under the NES-PF.

### **SUBMISSION 1**

#### **The lack of any need for a monitoring charge.**

Our question is what has changed between previous Long-term Plans and now? We have yet to see any documents from the TRC as to the alignment with the NES-PF and the TRC regional Plans. However even a quick view shows that there is much in common. The Regional Soil Plan permits vegetation clearance (Rule 1), which includes forest harvesting with similar conditions as the NES-PF for the basic issues. In particular the condition relating to associated discharges to water is included. Non-compliance with these standards cascades the harvesting activity to a controlled activity. Conditions for monitoring can be set for a controlled activity.

In previous Long-Term Plans there was no identification of forest harvesting consents requiring any special charges and in particular any requirements to undertake MCI monitoring.

Rules 37 and 38 in the draft merged Soil Water Plan permits forest harvesting along with conditions very similar to the NES-PF. The plan also allows for associated discharges of contaminants to water.

Section 87BB (1)(c) of the RMA states that

*“An activity is a permitted activity if adverse effects of the activity on a person are less than minor”.*

The RMA s 43A (3) provides that under a NES an activity *that has significant adverse effects* on the environment cannot be a permitted activity.

Both TRC and the NES-PF have assessed various forest activities including harvesting as falling within the scope of the criteria of a permitted activity subject to conditions.

TRC has permitted large amounts of forest harvesting in its region as permitted and if not as a controlled activity. In discussion with various forest managers in the region there is no indication that resource consents required the extent of monitoring regime that is now being proposed.

The state of environment reporting from the TRC does not indicate any concern with water quality from forestry. So what has changed? The only change is that under the NES-PF, TRC can charge for monitoring a permitted activity.

This is not a well thought out proposal and we would have expected some justification for charging what will be very expensive monitoring fees. In comparison with the fees set for discharges from dairy farms the potential charges for forestry will exceed these by thousands of dollars. There is no monitoring regime proposed for carrying out MCI stream monitoring for dairy farm discharges. This leads to our second submission

## **SUBMISSION 2**

There is no statutory power to establish a monitoring regime by way of the power to fix a charge.

The NES-PF **does not** provide a power to set a monitoring regime for permitted activities. While regulation 106 of the NES-PF allows for the setting of a monitoring charge it does not provide that TRC can go beyond the scope of the NES-PF and set up a monitoring regime.

Section 36 of RMA provides the power to the TRC to “fix a charge” for various RMA functions. Section 36AAA provides criteria. Neither section provides the power to set a monitoring regime. The proposed charges by TRC in this plan are ultra vires the RMA in that they try, by way of a power to fix a charge, to set up a monitoring regime.

It appears that TRC is viewing the permitted activities of the NES-PF as resource consents. It must be noted that while the NES-PF does prescribe permitted activities and standards it also prescribes an activity cascading regime of controlled and restricted activities. TRC may set up monitoring requirements as a condition of a certain consents but it does not have the power to go beyond the scope of the NES-PF for permitted activities.



Trying to require a pre-site condition is first beyond the scope of section 36 of the RMA and also beyond the scope of the permitted activity conditions set out in the NES-PF. While there are a number of “notice” provisions and a condition requiring the preparation of forestry earthwork management plans there is absolutely no requirement to have a pre-commencement site visit and one where a forester is required to discuss their proposed compliance.

### **SUBMISSION 3**

The proposed charges appear to confuse NES-PF permitted activities with resource consents.

The explanation for the charges refers to deposits which are not required by these proposals then goes on to use words such as “new consents” and “consent holders”. TRC can charge for resource consents but that is separate to fixing charges for permitted activities under the NES-PF. If TRC is proposing a monitoring regime for forestry per se then there should be some explanation as to why such new charges and why they are so excessive especially in comparison with other rural productive land uses.

### **SUBMISSION 4**

While the power to charge cannot establish a monitoring regime we question the focus on trying to require in stream MCI monitoring.

Instream macroinvertebrate survey is not appropriate because of the attribution issues. It is our understanding that MCI sampling is useful for state of the environment monitoring but its application to assessment of individual activities is not universally accepted, especially when considered in the context of a land use activity that is temporal in nature and once completed water quality recovers quite quickly to pre-harvest levels.

In the case of forestry it is difficult to attribute cause and effect with regard to all sediment in a stream - has it come from stream bank natural erosion especially erosion after a storm event or has it come from a particular activity such as roadworks?

Harvesting often involves the removal of stream shade where trees in the previous rotation were planted right to the stream bank. Increased exposure to sun light will impact MCI scores.

Further it is our advice from NIWA that a spot MCI score is meaningless – a sustained programme over a number of years is required to pick up trends. Forestry research shows that any changes in MCI data is temporal in nature and once completed water quality recovers quite quickly to pre-harvest levels. Regional data for MCI across New Zealand shows plantation forestry consistently trends just below that of native forest and well above other rural land.

So what is the purpose of this proposed monitoring regime? This leads to our next submission.

## **SUBMISSION 5**

What is the purpose of the purported “monitoring regime”?

Regulations 26 and 65 NES-PF (mentioned in the LTP under “Harvesting” on page 172) deal with sediment and contain permitted activity standards to ensure that after reasonable mixing, harvesting activity does not give rise to (a) any conspicuous change in the colour or visual clarity of receiving waters, (b) the rendering of freshwater unsuitable for consumption by farm animals; (c) any significant adverse effect on aquatic life. This may be the permitted activity standard that TRC is relying on to support the proposed sampling regime and related charges.

This is just one condition attached to the many conditions for permitted activities and is in effect the requirement of Section 70 of the RMA in relationship to any rule permitting discharges of contaminants to water. It is no different to what TRC has in its existing and draft regional plans.

However it appears that TRC is trying to monitor the effects on water rather than focussing on compliance with the suite of conditions for the permitted activities. The NES-PF sets up a process, one that TRC has adopted in its proposed new merged regional plan, where by a forester must prepare in effect “sediment and erosion control plan”. The plan must set out the methods that will be used to meet the conditions relating to controlling the discharge of sediment. The process endeavours to change approaches to land use management by “front loading” the planning of an activity. Requiring the provision of such sediment control plans and consideration of the compliance with the conditions is like a “farm management plan” and is anticipated as providing for sustainable land practices.

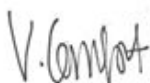
## **SUBMISSION 6**

We are concerned that the very expensive charges for what has always been considered a sustainable land use in the region, will lead to little investment in plantation forests.

It should be noted that manuka and kanuka plantations for honey production does fall within the scope of the NES-PF. We would have expected some full explanation as to the introduction of such high charges for monitoring.

We expected charges to be set but ones in compliance with legislation and one that related directly to compliance with permitted activities.

We wish to be heard on this submission.



Venise Comfort, Advisor, New Zealand Forest Owners Association.

**Joe Mack**

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**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Friday, 6 April 2018 12:25 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028  
**Attachments:** CJT-submission-on-TRC-Longterm-plan-2018-28-Final.pdf

**Title**

Ms

**If other, please specify**

**First name**

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**I wish to present my submission personally at a hearing scheduled for 7 May**

Yes

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

**Comment**

See attached full submission

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

No

**Comment**

See attached full submission

**Other proposed changes**

**Comment**

See attached full submission

**Additional comments**

**Additional comments explanation**

**Comment**

See attached full submission

**Document 1**

CJT-submission-on-TRC-Longterm-plan-2018-28-Final.pdf - [Download File](#)

**Document 2**

**Document 3**

**Document 4**

## **Taranaki Regional Council Draft Long-Term Plan 2018/2028**

### **Submission by Climate Justice Taranaki Inc., 6 April 2018**

#### **Introduction**

1. Climate Justice Taranaki Inc. (CJT) is a community group dedicated to environmental sustainability and social justice. This includes issues of inter-generational equity, notably in relation to climate change, which will impact future generations' inalienable rights to safe water, air and soil, crucial to sustaining livelihoods and quality of life. CJT has been incorporated under the Incorporated Societies Act 1908 since 26<sup>th</sup> February 2015.
2. CJT welcomes the opportunity to provide feedback on the Taranaki Regional Council's Draft Long-Term Plan 2018/2028. This submission goes beyond the two key proposals on which Council is seeking feedback. It also bears relevance to the Proposed Taranaki Coastal Plan.
3. CJT sees both the Consultation document and Draft Long-term Plan as highly aspirational, and if these aspirations are achieved, Taranaki's environment and community will be the better for it.

#### **Towards predator-free Taranaki**

4. CJT supports the principle of a predator-free Taranaki. Indeed, some of our members are active in voluntary pest trapping programs, with various organizations focused on this goal.
5. We believe that predator control and eradication strategies should focus on a major increase in targeted trapping, potentially incorporating more efficient trapping technology. Trapping should be undertaken by trained professionals including DoC and Council staff, contractors and members from NGOs. It needs to be adequately funded by regional and central governments and be much less reliant on volunteers.
6. We do however urge caution in considering other strategies, some of which, notably genetic manipulation of species, are unproven and may have significant side-effects or unforeseen and even irreversible consequences. Some of our members also hold strong reservations over large-scale application of poisons. While predator eradication is not CJT's core goal or purpose, we stand alongside other groups that are more focussed on these issues.

#### **Pukeiti / Taranaki Crossing and funding alternatives**

7. We note the remarks, *"This opportunity to expand the tourism offering comes in the wake of sharp reminders that Taranaki's core businesses of dairying and hydrocarbons are subject to fluctuating international pressures that are beyond the region's control"* (p.4 of Draft LTP), and:
8. *"Port Taranaki Ltd operates in a highly competitive trading environment and there are no guarantees that it will be able to continue to deliver forecast dividend levels... This is the biggest risk to the delivery of the Council's proposed programmes"* (p.6 of Draft LTP). Heavy reliance on the petrochemical industry for Port revenue as a major Council income earner is a real concern and must be addressed.
9. CJT also notes that tourism is subject to pressures beyond the region's control, especially international tourism. It is important to recognise that NZ's tourism is, and will likely remain, largely nature-based and is therefore incompatible with industrial dairying and hydrocarbon mining. Reducing the impacts of these two incompatible sectors and restoring damaged land and

waterways could be the best investment to support tourism that is dependent on the 'clean, green' image of New Zealand, which is, unfortunately, fast-eroding.

10. One of the constraints to tourism development, especially international tourism, is the likely increase in fuel prices leading to unaffordable airfares, as countries step up to greenhouse gas (GHG) reduction and climate change commitments as per the Paris Agreement<sup>1</sup>. International tourism is not sustainable for as long as it is heavily dependent on fossil fuels or biofuels, the large-scale production of which would potentially outcompete food crops.
11. CJT recommends sustainable tourism that is less dependent on fossil fuels and built structures, and more sensitive to the natural environment and carrying capacity of the sites. E.g. The tarns on the Pouakai Crossing are extremely sensitive and fragile to disturbance. Any increase in infrastructure and services that increases visitation has the potential to damage the tarns and nearby ecosystems. Careful control and management measures by relevant authorities, as well as education, are needed to avoid environmental impacts.
12. The access roads to Pukeiti are narrow and blend well with the natural landscapes and should be kept as such. If tourist numbers increase significantly, traffic congestion and impacts may be avoided by the introduction of a 'park and ride' scheme supported by a shuttle bus service, preferably electric.
13. In terms of alternative income generation and livelihoods, bearing in mind the volatility and environmental impacts of industrial dairying, fossil fuel mining and international tourism. CJT is of the opinion that Taranaki should be more proactively developing sustainable agriculture. There is a growing market for organic produce, locally and internationally, with demonstrable health benefits. We suggest that expanded focus and support for well planned, ecologically sustainable forestry projects, as part of a more diversified agricultural base for the region, are urgently required. Focussing on crop diversity, regeneration of soil health and local foods, and linking with local networks, will help ensure nutrition, well-being and resilience in our communities. These are becoming ever more important with increasing climate disruptions.
14. CJT recommends that the substantial financial commitments proposed in the LTP, especially for options 2 and 3, should be spent elsewhere, such as supporting sustainable agriculture which produces positive environmental outcomes, public transport, hazard management, just transition (See points 20-22), and improving environmental management and compliance monitoring (See points 51-52).
15. If either option 2 or 3 is adopted, we ask that Council ensures that local iwi are actively involved in the planning, decision-making and management of the programme. We do not recommend acceptance of corporate funding from the fossil fuel and petrochemical industry. If such funding is accepted by Council, we ask that no advertising of the funding source is made. Industry has used this ploy repeatedly to buy their social license to operate, a deliberate tactic to delay the urgent transition to renewable energy.

## **Public Transport**

16. CJT submits that far greater efforts and investments are needed to support public transport and electrification of transport, to reduce greenhouse gas emission, better meet public demand and respond to central government's recent draft Policy Statement on Land Transport<sup>2,3</sup>.
17. CJT reminds Council that WITT has submitted a request to consider a daily coastal bus service from Hawera to New Plymouth along SH45, to ensure that the lack of public transport is not a barrier to tertiary education and accessibility to essential services. This request is supported by coastal

communities like Opunake and Okato<sup>4</sup>. With central government's proposed funding expansion for public transport, there is good reason to seriously consider this request.

18. CJT also ask that Council incorporates some level of support to facilitate the uptake of electric vehicles and community EVs, in line with central government priorities<sup>5</sup>.

## **Hazard Management, Infrastructure Strategy & Just Transition**

19. CJT strongly supports considerations of climate change in the Hazard Management section of the Draft LTP. However, use of the 1 % annual exceedance probability (1-in-100-year event scenario) as a baseline needs to be placed in the context that historical frequencies and intensities of extreme events (rainfall, flooding, droughts etc.) no longer apply, the result of climate disruption<sup>6</sup>. The frequency and intensity of extreme events will continue to increase in coming decades<sup>7</sup>.
20. In this overarching respect, CJT does not accept the statement in the Consultation document that: *"There is no planned upgrade to the level of service provided by the Schemes before 2060. The risk to the Schemes' infrastructure arising from natural disasters is low."* Flexibility and preparedness are key to dealing with unpredictable and increasingly frequent, extreme weather events causing dangerous hazards to people and infrastructure.
21. In addition to river and flood control, hazards due to coastal erosion and storm surge, exacerbated by sea level rise<sup>8</sup> associated with climate change, must also be addressed. By way of an example from other NZ regions, *"If there were to be a 30cm sea level rise between now and 2065 – a relatively conservative possibility – what are today considered extreme, 1-in-100-year high water levels will occur annually in both Wellington and Christchurch. There are 32,000 homes within 1.5m of the current mean high tide level,"* warned Tim Grafton, CEO of Insurance Council of NZ<sup>9</sup>.
22. In relation to infrastructure strategy and financing, Prime Minister Jacinda Ardern recently stated<sup>10</sup>, *"Essential part of our transition plan are the governments' Provision Growth Fund and Green Investment Fund, which will invest in billions of dollars in local infrastructure and clean energy projects in areas that currently have a lot of jobs that rely on the fossil fuel sector."* CJT strongly urges Council to actively engage in and support this crucial transition.

## **Resource Management**

23. Page 40 of the Draft LTP states that: *"Resource management activities will contribute primarily to the outcome of a Sustainable Taranaki. They will also assist in the achievement of a Prosperous Taranaki by enhancing Taranaki's clean, green image and ensuring it remains a reality in overseas markets as well as emphasising Taranaki as an attractive place to work, do business and visit."*

### **How clean and green is Taranaki?**

24. Unfortunately, Taranaki does not have a 'clean, green' environment outside of the Egmont National Park, and if such an image exists in overseas markets, it is based on PR rather than reality.
25. Taranaki's economic base has been built largely on industrial dairying and mining of fossil fuels, both of which have been operating in the region for more than a century. At present these industries are major contributors to New Zealand's economy and greenhouse gas emissions (See point 49 below), which on a per capita basis are high globally. CJT recognize that the RMA presently precludes considerations of emissions per se, but nevertheless we urge Council to consider the implications carefully, for the future of our region, as indeed NZ more generally, depends on decisions made now. We simply have no more time for prevarication. Just as extreme weather events, floods and droughts will gain strength over coming decades, so too will rising sea level increasingly claim coastal land and infrastructure.

26. In addition to the large emissions of greenhouse gases, these industries use the environment as a dumping ground for other forms of pollution, largely with no charge, some, but not all of which is permitted by Council under numerous resource consents. Implicit, but unsaid, in these consents is the outdated notion that 'dilution is the solution to pollution'. CJT proposes that 'polluter pays' is a more equitable approach economically, although we should be transitioning rapidly away from highly polluting, unsustainable forms of industry (See point 22). While Council claims that most of the costs associated with agriculture and the oil and gas industry are covered by "*user-pays direct charges*" (p.80 of Draft LTP), we understand that such charges merely cover the administrative costs of consent processing and monitoring, not the actual environmental or remediation costs.
27. At present, the consent system allows the more or less regulated discharge of thousands of tonnes of waste water, soils, drilling muds and fracking chemicals, and gases each year into Taranaki's receiving environment.
28. By way of example: "*Methanex holds two consents to allow it to take and use water from two abstraction points on the Waitara River. Six consents allow the discharge of effluent /stormwater into the Manu and Waihi Streams and the Tasman Sea via the Waitara marine outfall. Methanex also holds two consents to discharge emissions into the air at its sites.*"

#### **Pollution levels and extent**

29. Although some of the discharged wastes from industry (mainly from dairying and fossil fuels) are considered 'benign' eco-toxically and environmentally, having been treated to greater or lesser degree to reduce impacts; others are not so benign. The latter pose a range of issues for land use, agriculture and human health, among other aspects, and leave a toxic legacy for future generations.
30. At present, despite concerted efforts towards ecological and economic sustainability by some local farmers, most dairying here operates on a high input industrial model heavily reliant on application of large quantities of urea and other fertilizers. Being derived locally from fossil-fuel, urea has been both readily available and affordable, and has enabled high stocking rates and enhanced production. Unfortunately, the resulting environmental impacts are widespread, indeed near-ubiquitous, around the Mount Taranaki ring-plain.

#### **Air pollution**

31. Taranaki's air quality is considered to be good by national standards, in large degree because of the prevalence of strong winds dispersing pollution. Nevertheless, chronic air polluting emissions are readily apparent from the aging industrial plants (Methanex, Ballance, Maui Production Station...), all of which are now decades old.
32. Venting and flaring of 'excess' gas in fossil fuel production are widespread across Taranaki, with episodic major releases raising significant concern among local residents and fire services<sup>11</sup>. The large amount of GHG, volatile organic compounds and other emissions that are produced via venting and flaring contribute to air pollution and pose a significant health risk to local people<sup>12</sup>.
33. Workers at the Fonterra plant at Pahiatua contracted Legionella disease, presumably in water droplets from the cooling tower<sup>13</sup> and CJT understands that the coastal Methanex plant uses toxic biocides to control aerial release of *Legionella*.
34. Air pollution and associated hazards arising from fossil fuel mining and production are at the centre of Taranaki Energy Watch's (TEW, Dec 2016) challenge to South Taranaki District Council in response to what TEW consider to be inadequate setback distances, among other aspects of air emissions, in the Environment Court, with a decision expected mid-2018.



### Soil pollution

35. Across the region, soil pollution is caused primarily by industrial dairying, with more localized contributions from fossil fuel processing and waste disposal, and other industries. The Taranaki dairy herd, estimated by the Agricultural Production Census (APS) and Agricultural Production Survey (Stats NZ with the Ministry for Primary Industries) at more than half a million cows (541,931 in 2015), has been supported by unsustainable application of urea fertilizer derived from fossil fuels, and through importation of palm kernel from palm oil plantations. As noted by the central government<sup>14</sup>:
36. *“High livestock numbers can affect native biodiversity and soil health. High livestock numbers can also impact on water quality because nitrogen and bacteria from urine and faeces can leach into groundwater or run off the land into rivers and lakes.”*
37. Notably Taranaki has the highest levels of Cadmium in soils of any region in New Zealand, associated with dairying and derived from high levels of fertilizer application (Taylor et al. 2007 Soil maps of Cadmium in New Zealand). Landcare Research Report for Ministry of Agriculture and Forestry). Although Taranaki’s cattle population has not risen in decades (actually showing a small decline), it is unsustainable without these high levels of inputs. This is not wise management practice, as was apparent during the prolonged drought of November 2017 – March 2018.
38. Landfarming – the practice of disposing drilling wastes on farms, remains a serious threat to soil health. There have been documented cases of breaches of consent conditions<sup>15</sup> and groundwater contamination<sup>16</sup>. The Parliamentary Commissioner for the Environment highlighted the issue of stock grazing on landfarmed areas before targets for persistent contaminants are met<sup>17</sup>. It is unclear whether the issue has been resolved. CJT is also gravely concerned about the variation of consent conditions over time, generally weakening environmental protection. E.g. The consent 7559-1 (20/11/2009)<sup>18</sup> to discharge drilling wastes (including water based and synthetic based drilling muds) via landfarming at the Surrey Road site held by C. Boyd included these conditions: *“7. The exercise of this consent is limited to wastes generated within the Taranaki region”; “10. An area of land used for the landfarming... shall not be used for any subsequent discharges of drilling waste”; and “15. No discharge shall take place within 25 metres of a water body [including farm drains], or property boundary”*. Consent 7559-1.3 (25/02/2016)<sup>19</sup> for the same site now allows for: *“8. ...waste generated in the Taranaki region, including from outside the 12 nautical mile maritime limit within the Taranaki Basin”; “11... further applications of material...”; and “16. No drilling waste shall be discharged within: a) 12 metres of property boundaries; or b) 12 metres of the Mangamawhete, Mangatengehu and Waipuku Streams; or c) 6 metres of any other surface water course (including farm drains)...”*

### Coastal pollution

39. This is also increasing rapidly along sections of the Taranaki coast, from both diffuse and point sources, most of which are difficult to pin-point. Recent king-tides associated with the passing of tropical storms deposited large amounts of plastic and other litter along roadsides (eg. Komene Beach and S of Bayly Rd approaching Cape Egmont). Local people attempted clean-ups in some places, but the scale of the problem is too great for individual volunteers.
40. As this is an obvious example of the declining state of Taranaki’s environment, it is strongly recommended that Council take a leading role in its appropriate removal and disposal. This could potentially be achieved through liaison with the Ministry of Justice and the Community Service system, or NGOs.

## Water pollution

41. Taranaki closely follows Waikato (largest regional dairy herd) in having the highest levels of Nitrate leaching, most of which derives from dairying<sup>20</sup>. Consequently, most rivers and streams running across the ring-plain carry episodically high loads of dairy-associated pollution following heavy rain (including nitrogen and phosphorous)<sup>21</sup>. This is obvious to people along the coast – fishers, swimmers, surfers, beachcombers and others – in the highly discoloured waters emanating from streams and rivers into coastal waters.
42. Council, to its credit, has initiated a riparian planting program, which will provide some uptake and impedance of runoff, although it cannot adequately address subsurface flow of the main water-entrophying nutrients, and hence will not solve the problem.
43. The Ministry for the Environment now requires Regional councils to specify the nutrient levels they are aiming for in their regional plans<sup>22</sup>.
44. In the section ‘Levels of Service’ from page 45 of the Draft Plan:

*3. Maintenance and enhancement of overall water quality in our rivers and lakes, groundwater and coastal waters*

*Measure: Parameters that characterise the physical, bacteriological, biological and chemical quality of surface water.*

*Target (Years 1-10): Improvements in nutrient levels (ammonia, nitrate, total nitrogen, and dissolved reactive and total phosphorus), appearance (turbidity, clarity, absorbance, suspended solids), organic contamination (biochemical oxygen demand), bacterial levels (faecal coliform and enterococci bacteria), temperature, and algal cover, against a baseline of 1995 water quality, as applicable, at 11 representative sites.*

45. CJT notes that at present Council monitors only a small number of sampling sites (11 sites) and questions their adequacy to provide a comprehensive assessment of the biochemical condition of Taranaki’s waterways. We could not find any pilot studies by Council to assess the number of sampling sites and times most appropriate for this important task. These should be based on analysis of the statistical power to detect change, in consultation with independent water quality specialists (see Monitoring below). CJT also question whether the MCI method used by Council for stream fauna assessment is the same as, and hence directly comparable with, the indices used by other Councils and central government? If not, then this needs to be rectified, to enable a fair national assessment to be made.

## Compliance Monitoring

46. Council has a significant monitoring program of discharges, as required under the RMA and other legislation. The program produces regular reports, many of which are accessible to the public. CJT has previously raised various issues regarding the design, methodology and results of certain past studies. Here, we express continuing concern about the level of ‘self-assessment’ in environmental monitoring that is conducted by the fossil fuel and related industries.
47. CJT stresses that this ‘trust us’ approach to industry in permitting self-assessment is not indicative of a fully independent approach by Council, the environmental ‘watchdog’, from those who are polluting the environment. One example of many: *“The Council’s monitoring programme for the year under review at each site included four inspections, continuous self monitoring by Methanex<sup>23</sup>...”*
48. CJT notes that in the Methanex Air Monitoring report for 2014-15, quantitative sampling of ambient air quality, conducted by a third party, occurred on just 2 days in 2014 and one day in

2015. This could not be considered as 'continuous self-monitoring'. No measurements were made of Carbon Dioxide emissions, following a 'minor variation' by Council to the resource consent in 2005, itself following changes to the RMA<sup>24</sup>.

49. However, earlier measurements (made before the amendment to the RMA) at the Ballance Kapuni urea plant, under special condition 5 of the now expired resource consent 4046-2, revealed that from July 2012 – June 2013, 170,000 tonnes of CO<sub>2</sub> were emitted to the air from the plant. Current resource consent 4046-3 no longer requires monitoring of CO<sub>2</sub> emissions. Both consent variations followed the 2004 amendment of the RMA which precluded regional councils from considering the effects of discharge of GHG on climate change when making a rule. However, the amendment did not preclude councils from monitoring GHG emissions; and as a matter of principle, we do not agree with the RMA amendment, as climate change must be at the core of all resource management decision making.
50. Notably, the 2016 National GHG Emission Inventory revealed the need for greater transparency of data, especially concerning the reporting of non-energy uses of fuels (e.g. by Methanex), as well as fugitive Methane emissions from natural gas processing<sup>25</sup>. CJT notes that regional councils have a role to play here, in ensuring that monitoring and reporting of GHG and other emissions are transparent and comprehensive.
51. CJT strongly recommends that Council undertakes the physico-chemical monitoring itself, rather than being focused mainly on observational visits. We ask that greater allocation of funding is made available from industry for more robust and independent compliance monitoring.
52. CJT calls for an independent technical review of the current discharge consent conditions and compliance monitoring programme, especially concerning the petrochemical industry.

### The decades ahead

53. Climate science indicates that adverse climatic conditions will become more frequent and intense in future. Unsustainable forms of resource exploitation are not inter-generationally equitable, and their economic viability is reliant on continued mining of fossil fuels, which must end within decades, from exhaustion of reserves, increasing costs, and/or more enlightened regulation. CJT urges Council to work effectively towards the latter.

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<sup>1</sup><https://www.icao.int/environmental-protection/Documents/ICAO%20Environmental%20Report%202016.pdf#search=Search%2E%2E%2Ecarbon%20neutral>

<sup>2</sup> <http://www.transport.govt.nz/ourwork/keystrategiesandplans/gpsonlandtransportfunding/>

<sup>3</sup> <http://www.radionz.co.nz/national/programmes/morningreport/audio/2018638944/transport-funding-shake-up-a-win-for-the-greens>

<sup>4</sup> <http://www.newplymouthnz.com/-/media/NPDC/Documents/Council%20Documents/Plans%20and%20Strategies/Community%20Board%20Plan%20-%20Okato.ashx>

<sup>5</sup> <https://www.eeca.govt.nz/funding-and-support/low-emission-vehicles-contestable-fund/>

<sup>6</sup> <http://www.climsystems.com/blog/post/when-a-1-in-500-year-event-is-not-as-it-appears-the-edgcumbe-flood-of-april-2017>

<sup>7</sup> [https://www.niwa.co.nz/files/Climate\\_Summary\\_March\\_2017.pdf](https://www.niwa.co.nz/files/Climate_Summary_March_2017.pdf)

<sup>8</sup> <http://www.pce.parliament.nz/publications/preparing-new-zealand-for-rising-seas-certainty-and-uncertainty>

<sup>9</sup> <https://www.interest.co.nz/insurance/92506/having-forked-out-240m-damage-caused-extreme-weather-events-last-year-insurers-call>

<sup>10</sup> <https://www.stuff.co.nz/national/politics/102498682/Jacinda-Ardern-We-re-already-planning-for-fossil-fuels-transition>

<sup>11</sup> <https://www.stuff.co.nz/business/91620588/Flare-off-sends-fireball-into-Taranaki-skies-prompts-fears-of-oil-and-gas-installation-fire>

<sup>12</sup> <https://www.tandfonline.com/doi/full/10.1080/00207233.2017.1413221>

<sup>13</sup> <https://www.stuff.co.nz/business/farming/74377129/legionella-disease-contracted-at-fonterras-pahiatua-plant>

<sup>14</sup> [http://archive.stats.govt.nz/browse\\_for\\_stats/environment/environmental-reporting-series/environmental-indicators/Home/Land/livestock-numbers.aspx](http://archive.stats.govt.nz/browse_for_stats/environment/environmental-reporting-series/environmental-indicators/Home/Land/livestock-numbers.aspx)

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- <sup>15</sup> <https://trc.govt.nz/assets/Documents/Environment/Monitoring-OGwaste/MR2017-CBoyd.pdf>
- <sup>16</sup> <https://trc.govt.nz/assets/Documents/Environment/Monitoring-OGwaste/MR2017-BTWWellingtonLandfarm.pdf>
- <sup>17</sup> <http://www.pce.parliament.nz/publications/drilling-for-oil-and-gas-in-new-zealand-environmental-oversight-and-regulation>
- <sup>18</sup> <https://trc.govt.nz/assets/Documents/Environment/Monitoring-OGwaste/MR2015-CBoydDrillingWaste.pdf>
- <sup>19</sup> <https://trc.govt.nz/assets/Documents/Environment/Monitoring-OGwaste/MR2017-CBoyd.pdf>
- <sup>20</sup> [http://archive.stats.govt.nz/browse\\_for\\_stats/environment/environmental-reporting-series/environmental-indicators/Home/Fresh%20water/geographic-pattern-agricultural-nitrate-leaching.aspx](http://archive.stats.govt.nz/browse_for_stats/environment/environmental-reporting-series/environmental-indicators/Home/Fresh%20water/geographic-pattern-agricultural-nitrate-leaching.aspx)
- <sup>21</sup> <https://www.lawa.org.nz/explore-data/taranaki-region/river-quality/>
- <sup>22</sup> <http://www.mfe.govt.nz/fresh-water/regulations/national-policy-statement-freshwater-management/2017-changes>
- <sup>23</sup> <https://www.trc.govt.nz/assets/Documents/Environment/Monitoring-Industry/MR2016-Methanex.pdf>
- <sup>24</sup> <https://www.trc.govt.nz/assets/Documents/Environment/Monitoring-Industry/MR2016-Methanex.pdf>
- <sup>25</sup> <http://www.mfe.govt.nz/publications/climate-change/new-zealand-greenhouse-gas-inventory-1990-2014>

6 April 2018  
Sustainable Taranaki  
PO Box 914 , Taranaki Mail Centre  
New Plymouth 4310

### **Submission on the Taranaki Regional Council 2018-2028 Long-Term Plan**

Thank you for the opportunity to submit on the 2018/2028 Long-Term Plan Taranaki Regional Council Consultation Document.

Sustainable Taranaki is the new public name for the work of the Taranaki Environmental Education Trust. The Trust has been working to advance environmental education and conservation and sustainability outcomes in the region since 1992, last year celebrating our 25-year anniversary.

#### **TRC support for Sustainable Taranaki**

We warmly support TRC's proposed funding for a Taranaki Enviroschools educator.

However we would also like to request financial support from TRC to support Sustainable Taranaki's work educating and promoting environmentally preferable behaviours and actions to residents throughout Taranaki. We would like to become a key delivery partner of TRC's environmental education strategy within the community.

In addition to funding support, we would like to be included as a key TRC stakeholder who represents, supports, and connects with the Taranaki public and business community on environmental issues.

#### **Background on Sustainable Taranaki**

We run a variety of programs to inspire and support individuals, youth, businesses and communities to value the environment and prioritise sustainability around Taranaki:

- [Workshops](#) that demystify sustainability and give residents hands-on skills to reduce environmental impacts.
- [IMPACT](#) sustainability youth action incubator program
- [Taranaki Sustainable Backyards Trail](#)
- [Events Calendar](#), monthly email updates, and face-to-face workshops and events.
- Presentations, training and inspiration for businesses, teams, clubs or groups
- Inspiration and support via social media, including linking to TRC resources, programs and events.

We are also in the process of developing environmental education resources and prioritised action suggestions on our website in TRC priority areas such as Healthy Land and Biodiversity, Fresh Water, Clean Air and Green Transport. These will be shared with TRC staff for review.

Sustainable Taranaki works with the following audiences within Taranaki on environmental education:

- Youth from 12 – 24 in our Impact action incubator program, with projects often focusing on biodiversity, weeds, planting and pest trapping
- Adults (individuals and groups) who are curious about the environment and those actively wanting to reduce their environmental impact
- Adults who aren't yet engaged on environmental issues
- Businesses, organisations and groups.

For more on Sustainable Taranaki and our work, please visit [www.sustainabletaranaki.org.nz](http://www.sustainabletaranaki.org.nz).

Each year we reach an estimated 5,000 residents with our environmental education, and with your support, want to scale up our work to reach as many Taranaki residents, businesses and groups as possible.

Environmental education of the general public is challenging work to fund over time, and we could do much more to achieve both TRC's and our own goals relating to environmental outcomes with your support.

Sustainable Taranaki's work would directly support the major initiatives and programs TRC are wanting to expand over the coming decade:

- Biodiversity protection – towards a predator-free Taranaki
- Pukeiti – a visitor hub for the Taranaki crossing
- Educating future generations
- Managing freshwater health
- Connecting with Māori

Our work also contributes to the majority of TRC program priorities set out in the plan. Specifically, we would contribute to the goals of the following programs:

*Supporting livelihoods*

- Managing and protecting natural resources
- Targeting pest plants and animals
- Riparian management
- Self help possum control

*Improving lifestyles*

- Environmental monitoring
- Buses
- Council gardens
- Restoring habitats

*Taking Taranaki forward*

- Advocating for the region.

We look forward to discussing Taranaki Regional Council support for our work with your Councillors and team, and would be happy to provide further information on our operational costs and the work and outcomes we could create with TRC's support.

### **Initiatives we support in the 2018-2028 Long-Term Plan Taranaki Regional Council Consultation Document**

#### Broaden your educational outreach by funding a regional Enviroschools position

As the organisation that helped establish and run Enviroschools in Taranaki in its initial years, we are very supportive of your planned funding support for a Taranaki coordinator for the Enviroschools program. This will bring a wide range of benefits tangatahi, teachers, schools, families, and future generations throughout Taranaki by knowledge and valuation of the environment being.

We are also in support of the following TRC proposals:

- Towards predator-free Taranaki
- Pukeiti/Taranaki Crossing
- Further develop its relationship with Māori, focusing on operational areas.
- Commit more resources to freshwater monitoring.

We wish to submit in person.

If you require any further information, please contact me at any stage.

Kind regards,  
Kati

Kati Freeman  
General Manager

0204 132 8909  
kati@sustainabletaranaki.org.nz  
[www.sustainabletaranaki.org.nz](http://www.sustainabletaranaki.org.nz)



SUSTAINABLE  
TARANAKI  
TARANAKI TIAKI TAIAO

**Joe Mack**

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**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Friday, 6 April 2018 2:27 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

Willie

**Surname**

Wetere

**Organisation (if applicable)**

Mōkau ki Runga Regional Management Committee

**Full postal address, including rural delivery and postcode**

Mōkau ki Runga Regional Management Committee  
c/o Maniapoto Maori Trust Board  
P O Box 36  
TE KUITI 3910

**Phone (daytime)**

021 949 267

**Mobile**

021 949 267

**Email address**

w.r.wetere@gmail.com

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

No

**Comment**

No comment



**Other proposed changes**

**Comment**

Yes, we believe that Council should further develop its relationship with Maori, particularly focusing on operational areas.

Yes, we believe that more Council resources should be committed to freshwater monitoring.

Yes, we believe that Council should fund a Regional Enviroschools position to broaden Council's environmental educational outreach.

**Additional comments**

**Additional comments explanation**

**Comment**

No further comment.

**Document 1**

**Document 2**

**Document 3**

**Document 4**

**Joe Mack**

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**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Friday, 6 April 2018 3:23 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028  
**Attachments:** Long-Term-Plan-Submission-2018-2028.pdf

**Title**

Mrs

**If other, please specify**

**First name**

Marlene

**Surname**

Lewis

**Organisation (if applicable)**

Stratford Primary School

**Full postal address, including rural delivery and postcode**

Regan Street  
Stratford  
4332

**Phone (daytime)**

06 765 6938

**Mobile**

0273169640

**Email address**

marlenel@sps.kiwi.nz

**I wish to present my submission personally at a hearing scheduled for 7 May**

Yes

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

**Other proposed changes**

**Comment**

**Additional comments**

**Additional comments explanation**

**Comment**

Please find attached document to support Enviroschools funding and coordinator role.

**Document 1**

Long-Term-Plan-Submission-2018-2028.pdf - [Download File](#)

**Document 2**

**Document 3**

**Document 4**



STRATFORD PRIMARY SCHOOL  
Regan Street, Stratford 4332  
P. 06 765 6938 E. principal@sps.kiwi.nz  
[www.stratfordprimary.school.nz](http://www.stratfordprimary.school.nz)



4 April 2018

Long Term Plan Submission 2018-2028  
Chief Executive  
Taranaki Regional Council  
Private Bag 713  
STRATFORD 4352

**To whom it may concern**

**Proposal to - Broaden educational outreach by funding a regional Enviroschools position.**

Stratford Primary School strongly supports the initiative for Taranaki Regional Council to form a partnership with Taranaki Enviroschools to provide more funding and a Coordinator to grow the role of Enviroschools throughout Taranaki.

Stratford Primary School is a very proud Enviroschool, we are totally committed to the continuation of awareness and education towards a more sustainable future for our tamariki. The skills that the students develop will help them to become global citizens assisting them in the ability to make effective changes now and in the future to protect all of our environment. They are our future! Throughout the school there is living proof and connections to how we care for, nurture and strive to continually develop our environment in a sustainable manner. However this takes a huge amount of time and effort from our staff and community.

More funding and extra facilitator hours are needed to support us and other Taranaki Enviroschools to further build upon our sustainable practices, develop programmes and ongoing initiatives to move us forward. We need all Taranaki schools onboard. At present it is noticeable that with a lack of funding and facilitators, progress is very slow.

It is evident that Enviroschools in other regions of New Zealand that have the Regional Councils onboard seem to be far more advanced, it is unfortunate that Taranaki seems to be lagging behind.

It would be more cost effective and beneficial to form a partnership with Taranaki Regional Council who have the expertise, resources and professional staff. A similar vision in educating for sustainability would have more of an impact combining Taranaki Enviroschools with Taranaki Regional Council.

Together we can achieve more and keep up with other regions in New Zealand.

Please consider our submission and we look forward to a positive outcome.  
Our Enviro group would like to attend on the 7 May, 2018 to support our submission.

Nga mihi nui

Marlene Lewis  
Stratford Primary School  
Enviro Coordinator

**Joe Mack**

---

**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Friday, 6 April 2018 2:56 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

Matthew

**Surname**

Jane

**Organisation (if applicable)**

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**Phone (daytime)**

**Mobile**

0278685501

**Email address**

mattyjyo@gmail.com

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

**Other proposed changes**

**Comment**

**Additional comments**

**Additional comments explanation**

**Comment**

**Document 1**

**Document 2**

**Document 3**

**Document 4**

## Joe Mack

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**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Friday, 6 April 2018 3:00 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028  
**Attachments:** TRC-LTP-Submission-Rotokare-SRT-2018.pdf

**Title**

Mr

**If other, please specify**

**First name**

Simon

**Surname**

Collins

**Organisation (if applicable)**

Rotokare Scenic Reserve Trust

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PO Box 33, Eltham 4353

**Phone (daytime)**

06 764 8500

**Mobile**

021 132 2205

**Email address**

simon@rotokare.org.nz

**I wish to present my submission personally at a hearing scheduled for 7 May**

Yes

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

We strongly support this proposed programme, and look forward to opportunities for collaboration with community organisations.

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

**Comment**

**Other proposed changes**

**Comment**

We support improved relationships with Maori.

We agree that increased freshwater monitoring is worth doing.

We encourage pro-active community education initiatives - this however we wish to express our sincere hopes that collaboration and consideration of community organisations delivering environmental education are an important element in any decision making process to increase education.

**Additional comments**

**Additional comments explanation**

**Comment**

The Rotokare Trust wishes to offer congratulations for the many achievements Council has delivered regarding biodiversity restoration.

Please see our attached submission letter.

**Document 1**

TRC-LTP-Submission-Rotokare-SRT-2018.pdf - [Download File](#)

**Document 2**

**Document 3**

**Document 4**



TRC LTP submission



Dear Basil and Councillors

2018-2028 Long-Term Plan Submission

The Rotokare Scenic Reserve Trust wish to express sincere thanks to the Taranaki Regional Council. The long-standing in-kind and financial support received from Council has been extremely valuable as this project has progressed. A significant Taranaki community-led project, a Key Native Ecosystem (KNE), a nationally respected pest-proof sanctuary, Rotokare is a proud and high achieving wildlife sanctuary contributing significantly to the Taranaki community and regional ecological restoration.

We congratulate Council for the very impressive progress achieved with KNE establishment, a pro-active approach to biodiversity restoration, and significant support and leadership with the development of Wild for Taranaki. We receive regular feedback from throughout the country of how impressed others are that Taranaki has achieved such a strong and genuine collaborative approach to biodiversity restoration – a benchmark for others to follow.

We also wish to specifically mention the staff (especially Environment Services) for their professional and positive support for many landowners and community organisations in the region – the support and technical assistance we receive is invaluable, and staff exemplary.

The Rotokare Trust is strongly supportive of Wild for Taranaki, and are actively pursuing opportunities to demonstrate that support through aligning goals and seeking pro-active means of showing that support to help encourage further regional collaboration and success.

The Rotokare Halo project has achieved a successful collaboration with 17 different landowners surrounding the sanctuary. This combined with South Taranaki Forest and Bird and Taranaki Kiwi Trust, over 4,000ha of land surrounding Rotokare is covered with intensive pest and predator control. Volunteer input and landowner contributions are increasing. To date over 7,000 pest animals have been destroyed during the establishment of this halo project.

We continue to deliver a comprehensive and high-quality environmental education programme, and actively pursue a variety of other community engagement, education, and wellbeing initiatives – a key focus for the Trust is maintaining an inclusive and passionate community-led project for the benefit of future generations. This includes an emphasis on working with others through collaborative projects, long-term partnerships, and supporting other organisations to achieve their goals.

We are committed to the Predator-Free 2050 movement, and consider Rotokare an important part of these aspirations for Taranaki.

Maintaining a pest-free sanctuary (including mice, despite periodic incursions) has been a stand-out achievement, and a rarity for mainland sanctuaries. This has not been without significant effort and many challenges. We are very proud of the restoration occurring within the sanctuary, resulting from the absence of pest animals. This has led to significant outcomes for biodiversity in Taranaki.

The Kohanga Kiwi at Rotokare partnership with Taranaki Kiwi Trust has established a highly productive breeding population of kiwi – we are now ready to supply kiwi to other parts of Taranaki, possibly as many as 20-30 per year. The tieke (saddleback) and popokatea (whitehead) released in 2014 have been successful – in particular the amazing population increase of tieke following the return to Taranaki after c150 years regional extinction. A dactylanthus translocation is in progress in partnership with DOC, a multi-year project. The recent supplementary translocation of toutouwai (NI robin) has been hugely successful. Last year we returned hihi (stitchbird) to Taranaki after c130 years regional extinction – a difficult species to manage, but we have achieved results surpassing expectations for a newly established hihi population. A supplementary translocation takes place in April 2018.

Perhaps the most rewarding biodiversity achievement recently has been the translocation from Rotokare of matata (fernbird), as species present prior to fencing and pest eradication which has flourished as a result. Matata have now been established in the Pauatahanui inlet, a long-term goal of another community-leg conservation project that we have been able to support.

Financially the Trust is slowly increasing the percentage of self-generated income, something we are extremely proud of, and work extremely hard to achieve. Multiple funding sources contribute to our annual income, from fundraising ventures and donations to grant funding and corporate sponsorship – the Trust is committed to a significant percentage of our annual income needs being self-sustainable. This is a difficult task, but in the last financial year (2016-2017) we achieved 58% of income from sources other than grants. Our operational costs have been increasing, and we have unfortunately returned small annual financial deficits recently – further cost reduction strategies and increased fundraising efforts are underway.

#### Submission

1. We ask that the Taranaki Regional Council continue its financial support for Rotokare via Wild for Taranaki and direct in-kind technical support for the duration of the long-term plan. While we continue to work hard on becoming more self-sufficient, we still require the Councils support for the foreseeable future.
2. We encourage the Council to maintain its support for Wild for Taranaki as this exciting initiative finds its feet – we have the upmost respect for the foresight shown by Council to step-in to ensure this initiative gained momentum. Now that good progress has been achieved, we hope Council will continue supporting into the future.

We wish to speak to our submission and look forward to answering any questions the Council may have.

On behalf of the Trustees in the Rotokare Scenic Reserve Trust,

Yours sincerely,

Simon Collins  
Sanctuary Manager  
Rotokare Scenic Reserve Trust  
simon@rotokare.org.nz | 021 132 2205

PO Box 33, Eltham 4353 | 06 764 8500 | [contact@rotokare.org.nz](mailto:contact@rotokare.org.nz) | [www.rotokare.org.nz](http://www.rotokare.org.nz) | [facebook.com/rotokare](https://facebook.com/rotokare)



2018/2028 Long-Term Plan Submission  
Chief Executive  
Taranaki Regional Council  
Private Bag 713  
STRATFORD 4352

Email: [info@trc.govt.nz](mailto:info@trc.govt.nz)

6 April 2018

**Submitter Details:**

Dr Jonathan Jarman  
Public Health Unit  
Taranaki District Health Board  
Private Bag 2016  
New Plymouth

**We wish to speak in support of our Submission.**

**Submission:**

The Public Health Unit of the Taranaki District Health Board welcomes the opportunity to submit on the proposed Taranaki Regional Council Long Term Plan.

The role of the Public Health Unit is to work with other agencies and with the community to improve, promote and protect the health of the public. Health is defined as “a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity” [World Health Organisation 1948]. The physical environment is an important determinant of health. We acknowledge that health of the environment has a special association with personal health for indigenous peoples such as the Maori.

We wish therefore to comment on the following proposals contained in the draft plan:

- TRC furthering developing its relationship with Maori, focusing on operational areas
- Commit more resources to freshwater monitoring.

We also wish to offer Taranaki Regional Council the opportunity to utilise the skills and resources of the Public Health Unit to implement a ‘Health in all Policies’ approach to policy development.

**Taranaki District Health Board**  
Private Bag 2016  
New Plymouth 4620  
New Zealand  
Telephone 06 753 6139  
Facsimile 06 753 7770  
Email [corporate@tdhb.org.nz](mailto:corporate@tdhb.org.nz)  
Website [www.tdhd.org.nz](http://www.tdhd.org.nz)

**Taranaki Base Hospital**  
Private Bag 2016  
New Plymouth 4620  
New Zealand  
Telephone 06 753 6139  
Facsimile 06 753 7710

**Hawera Hospital**  
Post Office Box 98  
Hawera  
New Zealand  
Telephone 06 278 7109  
Facsimile 06 278 9910

**Stratford Health Centre**  
Telephone 06 765 7189

**Opunake Health Centre**  
Telephone 06 761 8777

**Patea + Waverley Districts  
Health Centre**  
Telephone 06 273 8088

**Waitara Health Centre**  
Telephone 06 754 7150

**Mokau Health Centre**  
Telephone 06 752 9723

### **Working with iwi and hapu**

The Public Health Unit **supports** the Council's proposal to extend the relationship with iwi and hapu into operational areas, particularly relating to resource consents.

Maori are strongly connected with the environment through historical, cultural, spiritual, guardianship and food gathering activities. As stated in section 8 of the Resource Management Act 1991 (the Act) "in achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi)."

### **Freshwater quality**

The Public Health Unit **supports** the Council's proposal to commit more resources into freshwater monitoring to ensure the central Government's new freshwater monitoring requirements are met. Freshwater quality is important for physical health and also for the cultural health of Maori:

*"The health of the water reflects health of people and is intimately linked with identity"<sup>1</sup>.*

### **Health in All Policies approach – maximizing policy outcomes for the people of Taranaki**

The Public Health Unit has a skilled team that is available to assist the Taranaki Regional Council policy team with incorporating a Health in All Policies approach into policy development. Health in All Policies is an internationally recognised collaborative approach between health and other sectors. It involves a number of tools and approaches to maximise good policy outcomes.

Additionally the Public Health Unit also has a policy analyst available to assist the Regional Council in development of policy and plans and for work such as rapid review of evidence and health impact assessments.

If there are any queries about this response, please contact me at the Taranaki District Health Board by email [Jonathan.Jarman@tdhb.org.nz](mailto:Jonathan.Jarman@tdhb.org.nz) or phone (06) 753 7798.

---

<sup>1</sup> Wai Maori (2008). Discussion on Freshwater – A Wai Maori Perspective. Te Wai Maori Trustee Limited (Wai Maori), Wellington.

Yours sincerely



**Dr Jonathan Jarman**  
**Medical Officer of Health**  
**Taranaki District Health Board**



**Bevan Clayton-Smith**  
**Service Manager, Public Health**  
**Taranaki District Health Board**

**Joe Mack**

---

**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Friday, 6 April 2018 3:38 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Ms

**If other, please specify**

**First name**

Andrea

**Surname**

Moore

**Organisation (if applicable)**

Friends of Waitara River Inc

**Full postal address, including rural delivery and postcode**

PO Box 213  
Waitara 4346

**Phone (daytime)**

**Mobile**

027 3469504

**Email address**

friendsofwaitarariver@gmail.com

**I wish to present my submission personally at a hearing scheduled for 7 May**

Yes

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

Yes

**Comment**

We Support the need for a predator free Taranaki from the Waitara Catchment, without the use of 1080.

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

No

**Comment**

Monies could be better spent on projects that will benefit the local community - particularly Waitara.

**Other proposed changes**

**Comment**

We support relationships with Maori (Not only treaty settlement entities)  
Programme for freshwater monitoring needs to be independently reviewed.  
Yes, to funding a regional enviroschool

**Additional comments**

**Additional comments explanation**

**Comment**

**Document 1**

**Document 2**

**Document 3**

**Document 4**

Taranaki Energy Watch

## Submission: Taranaki Regional Council 2018-2028 Long Term Plan

### 1. **Water quality**

- (i) In the 2018-2028 Long Term Plan Consultation Document Taranaki Regional Council (TRC) is proposing committing more resources to freshwater monitoring. While Taranaki Energy Watch (TEW) support this commitment of more resourcing we have concerns with the water quality monitoring, results and where these resources might be placed.
- (ii) In the Levels of Service point 1 “Protection of the life-supporting capacity of water, instream uses and values: Measure: Microbiological state of inland waters and coastal waters at bathing sites”<sup>1</sup> TEW would like to support extending the testing of recreational water quality to all 20 water bathing sites to align fully with the MFE guidelines and the reporting protocols for the LAWA website. Currently this does not occur.<sup>2</sup>
- (iii) In the Levels of Service point 3 states “Maintenance and enhancement of overall water quality in our rivers and lakes, groundwater and coastal waters Measure: Parameters that characterise the physical, bacteriological, biological and chemical quality of surface water.”<sup>3</sup>
  - (a) The Council states “Overall, surface water quality in Taranaki is stable or improving and is generally better than in 1995” and “Trend analysis to June 2015, for both the past 19 and 7 years, has been completed and reported to Council. “ It is not clear why the Council is referring to the 2015 analysis when they have the trend analysis to June 2016 reported to them in June 2017.<sup>4</sup>
  - (b) The meaningful trend analysis reported to June 2016 shows that there is a deterioration in 26 parameters and improvement in 7 over the period since 1995 and no change in the remainder.<sup>5</sup>

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<sup>1</sup> <https://www.trc.govt.nz/assets/Documents/Plans-policies/LTP2018/SupportingDocumentation.pdf> p.45-46

<sup>2</sup> <https://www.trc.govt.nz/assets/Documents/Environment/Monitoring-SOE/Freshwater-bathing/FreshwaterBathingSEM16-17w2.pdf> p.9-10

<sup>3</sup> <https://www.trc.govt.nz/assets/Documents/Plans-policies/LTP2018/SupportingDocumentation.pdf> p.45-46

<sup>4</sup> <https://www.trc.govt.nz/assets/Documents/Environment/Monitoring-SOE/Freshwater-physico/physicochem1516-web.pdf>

<sup>5</sup> <https://www.trc.govt.nz/assets/Documents/Environment/Monitoring-SOE/Freshwater-physico/physicochem1516-web.pdf> p.78; p.85



Taranaki Energy Watch

- (c) It is not clear why bacterial levels of E.coli are not reported on in these environmental monitoring reports as the E.coli data is collected and recorded for each site however no trend analysis is completed. <sup>6</sup>

**2. Air quality**

- (i) Taranaki Energy Watch (TEW) note that Levels of Service point 7 states “Maintenance of a high standard of ambient air quality”. It is not clear how Taranaki Regional Council (TRC) have as a baseline that “between 2008 and 2015, air in the region matched the ‘good’ or ‘excellent’ categories of MFE” when there is no consistent environmental reporting on air quality in Taranaki. <sup>7</sup>
- (ii) There are environmental monitoring reports on nitrogen oxides however no other pollutants are routinely monitored and reported on in this format. <sup>8</sup> This is concerning given Taranaki has a number of significant hazardous facilities including oil and gas which all have resource consents to discharge contaminants to air. TEW wish to extend the environmental monitoring reports on air quality for nitrogen oxides to include a range of pollutants including BTEX.
- (iii) Both landfarming and hydraulic fracturing resource consents have potential impacts on air quality. This is referred to in the Ministry for Environment guidelines. <sup>9</sup> Resource consents for these activities do not have conditions requiring air quality to be monitored and reported on. TEW wish to extend consent conditions to include air quality monitoring of these activities.

**Sarah Roberts – Taranaki Energy Watch**

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<sup>6</sup> <https://www.trc.govt.nz/assets/Documents/Environment/Monitoring-SOE/Freshwater-physico/physicochem1516-web.pdf> p.53; p.78

<sup>7</sup> <https://www.trc.govt.nz/assets/Documents/Plans-policies/LTP2018/SupportingDocumentation.pdf> p.47

<sup>8</sup> <https://www.trc.govt.nz/council/plans-and-reports/environmental/environmental-monitoring-technical-reports/>

<sup>9</sup> <http://www.mfe.govt.nz/sites/default/files/managing-environmental-effects-of-onshore-petroleum-development-activities-pdf.pdf> p.54-55



Taranaki Regional Council  
Private Bag 713,  
Stratford 4352

6 April 2018

Attention: Basil Chamberlain

Dear Basil,

**R.E: Submission regarding the Taranaki Regional Council Long Term Plan 2018-2028 proposal (LTP)**

Taranaki Mounga Project (TMP) is an ambitious landscape scale ecological restoration project being delivered through a partnership between Ngā iwi o Taranaki, agencies including the Department of Conservation, the NEXT Foundation, Shell New Zealand, TSB Community Trust, Jasmine Social Investments and the Taranaki community.

The investment proposed in the Taranaki Regional Council (TRC or the Council) LTP would take the outcomes we are seeking to another level. This is both in terms of biodiversity outcomes for the region, and the degree of collaboration to achieve a collective outcome. Inclusion in the LTP provides confidence for other new partners in Predator Free New Zealand 2050 (PF2050), additional investment from research agencies like Manaaki Whenua Landcare Research, collective buy in of other local authorities and others to invest in the biodiversity of the Taranaki region.

To this end, TMP commend the Council on its vision, and support the inclusion of the following projects in it's LTP:

Biodiversity

The Council has demonstrated significant leadership and taken ownership of the work required to protect Mounga Taranaki from re-invasion of pests and predators from the ring plain. TMP is fully supportive of projects included in this LTP ramping up biodiversity protection towards a predator free Taranaki. Specifically:

- Investment in an initial three-year spending programme targeting the Waiwhakaiho catchment trial, along with a new trial aimed at completely eliminating possums in a 5,000-hectare area west of the mountain including public conservation land and private land and covering rural and built-up zones. A separate programme is also proposed to reduce predator numbers on 70,000 hectares of land in and around Mt Taranaki;
- Continued investment in Wild for Taranaki and the Regional Biodiversity Fund;
- The TRC Key Native Ecosystem Programme (KNE), including the creation of new KNE, in particular those adjoining or supporting the TMP project area; and
- Investment in the Taranaki Regional Pest Management Strategy, and Taranaki Regional Pest Management Plan processes and delivery.

Community Engagement

TRC has a magnificent track record working with the Taranaki community on our biodiversity and biosecurity issues. If TMP is to be successful, the expertise of the Council in landowner engagement will be critical. In that regard TMP is supportive of continued investment in advocacy and community engagement roles and functions included in this LTP.

Education

The TRC education programme is well respected within the region. This programme includes an education resource that provides an opportunity for Taranaki youth to visit, learn and experience the Mounga. TMP is supportive of the continued investment in programmes such as this, as well extending educational outreach by funding a regional position for the Enviro-Schools organisation in the LTP.

Thank you for the opportunity to comment on this proposed LTP. We are looking forward to implementing the projects listed in this document alongside the Council and others to success.

We would appreciate the opportunity to be heard in relation to this submission.

Yours sincerely



Jan Hania  
Project Director  
Taranaki Mounga

**Joe Mack**

---

**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Friday, 6 April 2018 3:52 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mr

**If other, please specify**

**First name**

Hasely

**Surname**

Lobb

**Organisation (if applicable)**

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**Phone (daytime)**

0212014258

**Mobile**

0212014258

**Email address**

taranakimtb@gmail.com

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

The New Plymouth Mountain Bikers Club (725 members in 2017) support the construction of trails open to mountain bikes within and around Pukeiti. We also support the development of shared MTB/walking trails around Taranaki.

**Other proposed changes**

**Comment**

**Additional comments**

**Additional comments explanation**

**Comment**

**Document 1**

**Document 2**

**Document 3**

**Document 4**



David Macleod  
Chairman  
Taranaki Regional Council

Via email: [info@trc.govt.nz](mailto:info@trc.govt.nz)

Rāhina, 19 Huitanguru, 2018

### **Long Term Plan 2018-2028**

Tēnā koe David

1. On behalf of Te Korowai o Ngāruahine Trust (TKONT) thank you for the opportunity to provide a submission on the Long Term Plan 2018-2028. TKONT would first like to acknowledge the Regional Council for a thorough and comprehensive Plan. We would also like to acknowledge the Regional Council staff with whom we work on a broad range of kaupapa. The relationship that we have continues to go from strength to strength. We have reviewed the Draft Plan and in this submission set out a number of comments for your consideration.
2. TKONT's interest in the Plan stems from Ngāruahine iwi having a special cultural, spiritual, historical and traditional association with the whenua upon which the activities take place. TKONT, as the post-settlement governance entity for Ngāruahine has a responsibility to ensure that the interests of Ngāruahine are safe-guarded. This includes considering the extent to which the proposed activities, may impact (potential or actual) on the environmental, cultural and spiritual interests of Ngāruahine within it rohe (tribal area); and those areas under statutory acknowledgement and/or Deed of Recognition (Ngāruahine Claims Settlement Act 2016); and the potential or actual risks to the physical, psychological, cultural and spiritual wellness of Ngāruahine (Te Korowai o Ngāruahine



Trust Deed). Therefore, TKONT makes submissions to any relevant policy matters within its rohe. This does not prevent the Ngāruahine hapū submitting on their behalf, nor should it be in any way viewed as compromising the mana motuhake of the hapū.

3. It is heartening to see the partnership with Māori as one of the cornerstone projects that the Regional Council is focussed towards. There are many similarities with the areas of focus and priority between iwi with the Regional Council, and it is the firm belief of TKONT that we can only achieve the regional goals that we all aspire to by working together.

#### **Resource Management Commissioners**

4. In our 2015 submission we asked that the Council make an active commitment and investment into the training of Māori Resource Management Commissioners. TKONT is unaware of the progress that has been made in this regard and again asserts the need for a greater number of Māori Commissioners. Māori commissioners can provide valuable insight and support about a range of matters as well as supporting understanding about Te Ao Māori perspective.

#### **Tikanga Training**

5. Within the 2015 draft LTP and again in the 2018 draft plan the Council makes a commitment to provide tikanga training to Council staff and councillors. TKONT would appreciate an update about the extent of the training that has taken place and whether the Council has engaged expertise from the region's iwi. It is important that Councillors and Council Staff receive regular training and support in this area, and that they draw on the considerable Māori strengths and iwi knowledge within our region.

#### **Fish passes and unused weir**

6. As TKONT continues to engage with the Regional Council on resource consent matters we have become increasingly aware of the number of weirs across the Taranaki ring-plain that cause an impediment to the movement of native fish. The Council's policies are to ensure that the structures do not inhibit fish movement, or are removed. TKONT



therefore requests that the Council make an additional resource commitment to addressing this issue. TKONT would like to see a level of service indicator set for the achievement and measurement of this issue.

7. Some weirs of concern to TKONT include Eltham Weir (Waingongoro River), which as we understand is an abandoned structure; the Glenn Road Weir (Kaupokonui Stream) which is a significant barrier to native fish, the Normanby Weir (Waingongoro River) which has been subject to compliance issues in recent years, and the Puneho Weir, which has consistently been identified as having barriers to passage. It is likely that there are more weirs of concern in the Ngāruahine rohe, and we request that a commitment is made to addressing these matters via this LTP.

**Access to data**

8. TKONT since its' since its formal inception has adopted a policy of engaging in all consent and policy matters within the Ngāruahine rohe. TKONT takes its kaitiaki responsibilities very seriously and tries to engage in consent matters in ways that are constructive and useful for both the iwi and the environment. To this end, access to quality data in a timely fashion is important.
9. Whilst there is a considerable volume of data that is available it is not always easy to find, and on many occasions we are required to request data, but indeed this relies on us knowing what is available. TKONT would like to see further improvements made to the naming conventions for files on the website (particularly monitoring reports) and the placement of data so that information is easy to find.
10. One piece of data that would be particularly useful for TKONT is access to water abstraction data at both a farm level and at a catchment level. Abstraction information, as we currently understand is supplied to the Council via the dataloggers. Council staff then download this and charge the consent holder. We suggest that efficiency improvements can be made to the system, perhaps the direct uploading to the Regional Council website





and then having a provision for this data to be viewed when required. We accept that there may be data protection considerations, but propose that it is possible to share data with parties who require access, for purpose, and a limited time. Regarding catchment data, TKONT would like the Council to commit to providing this information publicly, via the website in an accessible and understandable form.

### **Predator Control**

11. TKONT is very supportive of the 2050 Predator Free goal and we look forward to working alongside Council, landowners and community environmental partners to achieve the vision. Whilst we acknowledge the core population base is the New Plymouth district, it is once again disappointing that the focus or investment will not reach South Taranaki until year five.
12. The Council is committing an initial three year spend to support this kaupapa. TKONT proposes that a financial commitment is made for the whole ten years. If we are serious about achieving this goal we must look further than three years. A targeted partnership approach and a commitment to long term funding has a greater potential to achieve the lofty aspirations. As you state in the plan, the current commitment equates to an average \$1.67 per household, a small investment for a substantive economic and environmental benefit. The preferred option for TKONT is option c, an extension of the programme beyond three years.
13. TKONT also proposes that Council staff are resourced to work alongside iwi such as Ngāruahine to develop programmes in our rohe, at a date earlier than the Predator Free strategy proposes. We are asking for the Council to come and talk with us about what we can do and how you can help us.
14. The Predator Free priority is part of a much bigger strategic picture. The priorities of the the Taranaki Mounga team and the aspirations of the draft *Taranaki Mounga Translocation Strategy* (Parker, 2018) require a strong commitment to predator control.



TKONT would therefore like to see the adoption of clear and demonstrable targets for the reduction of pests. Without firmer Council commitment and resources in this area, the community based predator free work will be in vain. TKONT identifies this as one of the most important focuses required for the next 10 years.

### **Freshwater Quality**

15. Freshwater quality is another important priority for TKONT. Indeed most of our engagements with the Regional Council are focussed to this kaupapa. We acknowledge the good work of many landowners regarding their riparian planting, fencing and improvements to discharge methods, but the work is by no way complete. There is a need for landowners to extend and maintain their planting, to prioritise the re-establishment of native plants, to ensure that planting is of a sufficient depth and density to truly offset nutrient contamination from both land use discharges and stormwater run-off, and to fence off access to waterways. We urge a resource push in this area to ensure that the 2020 targets are met and that the planting and fencing is of a high standard.
  
16. TKONT proposes that there is more effort and resource required for freshwater monitoring. During 2017 a small number of Ngāruahine hapū participated in SHMAK training with Regional Council staff. The training supported hapū to build knowledge and capability about the freshwater monitoring used in the regional council. TKONT is keen for further training to take place, so that we can build the capacity and capability of our kaitiaki across the rohe. We would also like to support the development of joint monitoring between hapū and the Council. This will require the Regional Council to commit additional resource within this LTP.
  
17. In addition to the current monitoring methodologies, TKONT would like the Council to work in partnership with iwi and hapū to develop cultural health indicators for the measurement of freshwater health, so that these can become embedded into to the Council's core monitoring programme. TKONT proposes that the skills within the Council



and the iwi and hapū are mutually beneficial to improve the condition and state of our freshwater environment.

18. Finally TKONT would like to see an extension to the monitoring sites that form part of the State of the Environment reporting. If we are to truly understand the impact that our efforts are making it is important that we enhance and expand our monitoring regime. TKONT would like to work alongside Council staff to identify those additional sites that could benefit from enhanced monitoring.

19. TKONT would like the Council to commit additional resources to support iwi and hapū with freshwater monitoring and our kaitiaki role as environmental and cultural monitors, and to dedicate additional resource to support the co-creation of cultural health indicators and to extend the freshwater monitoring programme.

#### **Freshwater Levels of Service**

20. TKONT has reviewed the levels of service that relate to water, and proposes that these should be more aspirational and more user friendly. The specific concerns we have regarding the levels of service are set out below:

- a. It is particularly concerning that only 6 of 11 freshwater sites were compliant 87% of the time. This would suggest that 5 sites were never compliant. What action is being taken and proposed to address this?
- b. TKONT would also like to know which catchments / sub catchments are not meeting the guidance for general ecological flow.
- c. What catchments are considered significant for water abstractions?
- d. What action is proposed to improve the compliance of water abstraction consents?
- e. Why is 1995 used as a baseline for many of the level of services? At what point will a more recent date be used to assess performance?
- f. It is important to represent the changes in quality more accurately by separating the water sites where quality have been either “maintained” or



“improved”. The two measures are quite different and should not be measured as one.

- g. What action is being taken to further reduce the nitrate levels in groundwater? Only one quarter of sites have showed an improvement.

### **Education**

21. TKONT commends the Council’s education team. Their expertise, knowledge and enthusiasm has far reaching effects across the rohe. TKONT would like to see this extended. An investment into building the environmental and cultural capability of our tamariki and rangatahi is an investment into the health and spirit of our environment. In extending the education programme TKONT would like to see a greater attention paid to education that is respectful of Te Ao Māori and our relationship to and with the environment. It is important that a mātauranga approach is communicated in no less than equal status to a Te Ao Pākehā understanding of the environment.

22. TKONT would like to see targeted investment to explore, with iwi, the development of an education resource (classroom) on the mouna. The Bublitz Education Centre at Pukeiti provides an important resource education, but this alone is not enough if we are to truly transform our environmental understanding and awareness. The mouna is an important location for cultural and environmental education and we would like the Council to allocate resource and to begin an conversation with iwi about this opportunity.

### **Iwi Committee Representatives**

23. In our submission to the 2015-25 LTP, TKONT noted the need for the Regional Council to implement the Standing Committee representation from iwi. We commend the Council for the implementation and establishment of these appointments and we look forward to the iwi representatives influencing the policy and direction of the Council in ways that safeguard Māori cultural and environmental interests towards the environment. TKONT recognises that we are still in the early stages of the journey, but does make a request



that the representatives are issued with the papers more than two days in advance (as is the current practice).

24. TKONT would like to know how many days in advance the Councillors receive their committee papers. TKONT proposes that the Iwi representations are sent the committee papers at the same time as the Councillors. If the Councillors are sent their papers the same time as the iwi representatives (two days in advance), we assert that for iwi this time is not sufficient. We also highlight that the supply of papers two working days in advance treats the iwi representatives as members of the public (S46a LGOMIA 1987). It is important that our iwi members have enough time to process and digest the large reports, to seek advice where needed and have an equal ability to participate and partner in Council processes.

#### **Resource Consent Processes**

25. The Working with Iwi section with the Supporting Documents file reflects one of the ways to work with Iwi is to make best use of the resources of Māori. TKONT suggests that there are improvements that can and should be made in this regard. Too often in the resource consent processes Iwi are sent resource consent applications that relate to a single site in a piecemeal approach. This is inefficient and a drain on our resources. TKONT requests that applicants are required to submit a suite of resource consent applications bundled for all activities on the site, so that the process can be dealt with efficiently and so that the full effects of an activity can be considered together. TKONT also requests that the Regional and District Councils align their processes where an activity falls under the jurisdiction of both tiers of local government.

#### **Working with iwi**

26. TKONT appreciates that commentary provided by the Council in the Working with Iwi section, but proposes that the extensive use of words such as “encourage” and “consider” does not offer the certainty or commitment that TKONT would like to see with regards to building a true environmental partnership with iwi and hapū. There is a need



for firmer commitments that truly allow us to measure the effectiveness of the Council's relationship with iwi.

27. TKONT has worked hard to build an effective relationship across Council since 2014 and we believe that this relationship is evolving and progressing well. As the LTP acknowledges there is room for improvement, particularly in regard to resource consent and policy processes. The Mana Whakahono a Rohe offers potential to address these opportunities. TKONT therefore takes this opportunity to signal to the Council our wish to begin the process to develop a Mana Whakahono a Rohe.

#### **Resource Management (Supporting Documents)**

28. TKONT read the resource management section of the supporting documents file with interest. Within the plan (p.42) the text uses language such as "precise", "defensible", and "comprehensive" data. TKONT whole heartedly supports the need for credible and reliable data. On page 43, the text refers to the "innovative" and "different world view" that Māori knowledge and research can bring. Whilst we are sure that this was not the intention, it is important that one world view is not treated as superior to the other. The dominance of a Western scientific paradigm undermines the credibility and validity of mātauranga Māori and the use of the words "different" and "innovative" appears as an alternative to a dominant view. It is important that the mātauranga of Māori is presented as equal and credible so that it too becomes the convention and norm.

29. Much of the current research world operates using a mixed methods approach; approaches where we combine qualitative and quantitative and where we combine and equally respect different ideological positions and world views. It can be challenging and confronting to give equal status to a knowledge base that we may not wholly understand, and it is sometimes uncomfortable to reflect on the world and the environment in ways that we are perhaps not used to. A genuine participatory partnership between iwi



researchers and experts and Council will therefore benefit and enhance understanding about Māoris' longstanding credible knowledge base.

### Conclusion

30. In conclusion, we once again thank the Council for the opportunity to contribute to the Long Term Plan. TKONT genuinely believes that we are moving in the right direction, but urges the Council to commit more financial and staff resource to working collaboratively with iwi, so that together we may safeguard the environment, our past and our present for the benefit of all.

31. We trust that these comments are helpful. Should you require any further information or clarification about these comments, please contact me at [policy@ngaruahine.iwi.nz](mailto:policy@ngaruahine.iwi.nz).

Nāku iti noa, nā

A handwritten signature in black ink that reads "Louise Tester". The signature is written in a cursive, flowing style.

Louise Tester (PhD)  
Kairangahau Matua

**Joe Mack**

---

**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Friday, 6 April 2018 6:48 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

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**I wish to present my submission personally at a hearing scheduled for 7 May**

Yes

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

No

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

Yes

**Comment**

**Other proposed changes**

**Comment**

**Additional comments**

**Additional comments explanation**

**Comment**



My submission is a request that the TRC stop allowing the burning of plastic baleage wrap in rural Taranaki. The rationale to burn archaic\*. The plastic needs to go to the recycling stream. Plasback operates their pickup and recycle scheme province wide at the same price for all.

Burning plastic releases dangerous toxins into the environment.\*\* The 1956 Health Act stipulates, promotion of health and well being of the WHOLE community. The Local Government Act 2002 (as pertains to section 51 of the Waste Minimisation Act 2008) directs that the environment and public health is adequately protected.

\*see TRC Long Term Plan, Section 3, Rule 33, Page 50

\*\*see Ontario Agricultural Waste Study: Environmental Impacts Of Open-Burning Agricultural Plastics: Final Report; July 2011:

I wish to present my submission personally at the scheduled hearings

Ritchie Dahm

I wish to present

**Document 1**

**Document 2**

**Document 3**

**Document 4**



## **Ontario Agricultural Waste Study:**

# **Environmental Impacts of Open-Burning Agricultural Plastics**

*Prepared by  
Sonnevera international corp.*

## **Final Report**

July, 2011





sonnevera international corp.

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## Executive Summary

In their daily activities, farmers use a variety of plastics, including baler twine, silage wrap, grain bags and pesticide containers. A comprehensive program operated by CleanFARMS exists nationally to manage waste pesticide containers, but no similar program exists for other farm plastics, and these materials present a serious disposal issue to farmers across Canada.

On-farm burial and burning of waste plastics remains a common practice, resulting in both air pollution and resource conservation concerns.

Open burning of agricultural plastics can lead to the release of many air pollutants and hazardous byproducts, including heavy metals, dioxins and furans. On-site burning of household garbage (such as burning barrels) has been identified as the largest source of dioxin emissions in Ontario. Dioxins and furans are a health concern even in very small quantities, being associated with endocrine disruption, heart disease, cognitive and motor disabilities, as well as being a known human carcinogen. Exposure to pollutants can occur through direct inhalation or ingestion of contaminated plants or animals.

The burning of plastic agricultural plastics is of particular concern to the Great Lakes Basin Watershed - home to 95 percent of the surface water in North America along with 21 percent of the world's surface freshwater - where dioxins and furans pose a serious threat to aquatic species, wildlife, soil fertility, and humans. Dioxins and furans are also considered a Tier 1 pollutant by the Canada-Ontario Agreement Respecting Great Lakes Basin Ecosystem, whereby all sources of Tier 1 pollutants are to be eliminated.

Recycling the agricultural plastics that are used annually in either Alberta or Ontario would represent a net greenhouse gas savings of more than 20,000 tonnes of CO<sub>2</sub> equivalent, or the same impact as removing more than 4000 vehicles from the road for a year.

There is a strong national need to develop a comprehensive stewardship program for waste agricultural plastics to address the lack of adequate management systems for these waste products, and the potential environmental impacts associated with improper disposal.

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sonnevera international corp.

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## Background

In their daily activities, farmers use a variety of plastics, including baler twine, silage wrap, grain bags and pesticide containers. Use of agricultural plastics is increasing, as applications such as large plastic grain bags for on-field storage are becoming ubiquitous. A comprehensive program operated by CleanFARMS exists nationally to manage waste pesticide containers, and farmers have easy access to this program to dispose of their used pesticide containers. However, no similar program exists for other farm plastics, and these materials present a serious disposal issue to farmers across Canada.

The types of plastics commonly utilized by the agricultural industry are outlined in Appendix A. Once these materials become waste, farmers generally have four options for end-of-life management:

1. On-farm open burning
2. On-farm burial
3. Transport to a municipal landfill site for burial
4. Transport to a public or private location for recycling

In almost all cases, the recycling of plastics results in a net reduction of a host of harmful emissions and also reduces the consumption of non-renewable resources. This generally means that recycling results in the largest net environmental benefits for most agricultural plastic products.

However, access to recycling facilities for agricultural plastics is limited in most locations. In addition, disposal of these materials at municipal landfill sites is restricted in some areas. Therefore, while most farmers make efforts to be good environmental stewards, open burning of waste plastics on farms remains a common practice. This presents both air pollution and resource conservation concerns.

In November 2010, a survey was conducted by Black Sheep Strategy on behalf of CleanFARMS to investigate the disposal options Ontario farmers were using for the plastic agricultural waste they generate.

During the survey, farmers reported they burned over half of their empty seed bags on-site, along with almost half of the used twine and net wrap. Plastic wrap, empty feed bags, and silage wrap were reported as being burned on-site in about one quarter of cases, while a large portion of the remainder is sent to landfill. Farmers also indicated their willingness to recycle material, with 16% indicating they take plastic wrap to a collection site and 14% take wrap to town recycling. (Black Sheep Strategy, 2011) It is likely that the somewhat dubious practice of burning agricultural plastics is underreported in surveys such as this one, as respondents will attempt to provide “correct” answers in cases where they may

feel their behaviour may not be socially acceptable. Some other references have suggested that up to 80% of some agricultural films, for example, are burned on-site (Environmental Health Strategies, 2005).

This survey is supported by anecdotal information from the western provinces that suggests that open burning of agricultural plastics is very common, as well as U.S. references that suggest approximately half the agricultural plastics in that country are burned (Environmental Health Strategies, 2005).

Of the Ontario farmers surveyed, 20% of them stated that they “strongly disagree” with the statement “I am uncomfortable burning or putting certain products in my own or other landfills, but don’t see any alternative” while 27% “strongly agreed”. These statistics show that over one quarter of the farmers feel that burning or burying their plastic agricultural waste is not the best option, but also feel they have no other choice. The 20% that disagreed with the statement are representative of the population of farmers that are not aware of the potential risks of burning plastic agricultural waste.

***Surveys show that a significant amount of agricultural plastic waste is burned on farms.***

## Potential Human Health Impacts

Agricultural plastics burn easily but incompletely in an open burning scenario. Incomplete combustion can lead to the release of carbon monoxide as well as many other air pollutants. In addition, hazardous byproducts can be present in the residual ash and in airborne emissions in the form of heavy metals, dioxins and furans. For additional information on incomplete combustion of plastics during low temperature burning, see Appendix B.

Probably the emissions of greatest concern during open burning of agricultural plastics are dioxins and furans, which are particularly formed in instances of low combustion temperatures, such as those associated with open burning.

It is natural to assume that dioxins and furan emissions are mostly produced by large industrial facilities. However, the United States Environmental Protection Agency estimates that 19 percent of dioxins and furans released in 1995 were generated by residential burning of household garbage (C2P2, 2010). At the same time, the burning of household garbage in burning barrels has been identified as the largest source of dioxin emissions in Ontario (Great Lakes Binational Toxics Strategy, 2007). Open burning of agricultural plastics is one of the contributors to these emissions.



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Dioxins and furans are a health concern even in very small quantities, being associated with endocrine disruption, heart disease, cognitive and motor disabilities, as well as being a known human carcinogen. Humans can be exposed to dioxins through plants, or through meat, as they concentrate in animal fat (C2P2, 2010). This suggests that the burning of agricultural plastics, and associated dioxin generation, is particularly troubling, as the practice occurs on or near active agricultural land. Further, if the majority of dioxin intake to humans comes from food sources, dioxin emissions from the burning of agricultural plastics has the potential to impact a wide population when they land on feed crops and are concentrated in the bodies of farm animals.

Emissions of other air pollutants associated with open burning of garbage include volatile organics (such as benzene), fine particulate matter (PM10) and poly aromatic hydrocarbons (PAH)(such as benzo(a)pyrene), and heavy metals. For many of these other pollutants, the principal pathway into humans is directly from inhalation of smoke from burning garbage (C2P2, 2010). This suggests the predominant risk associated with these emissions from the burning of agricultural plastics is borne by the farmer and local community.

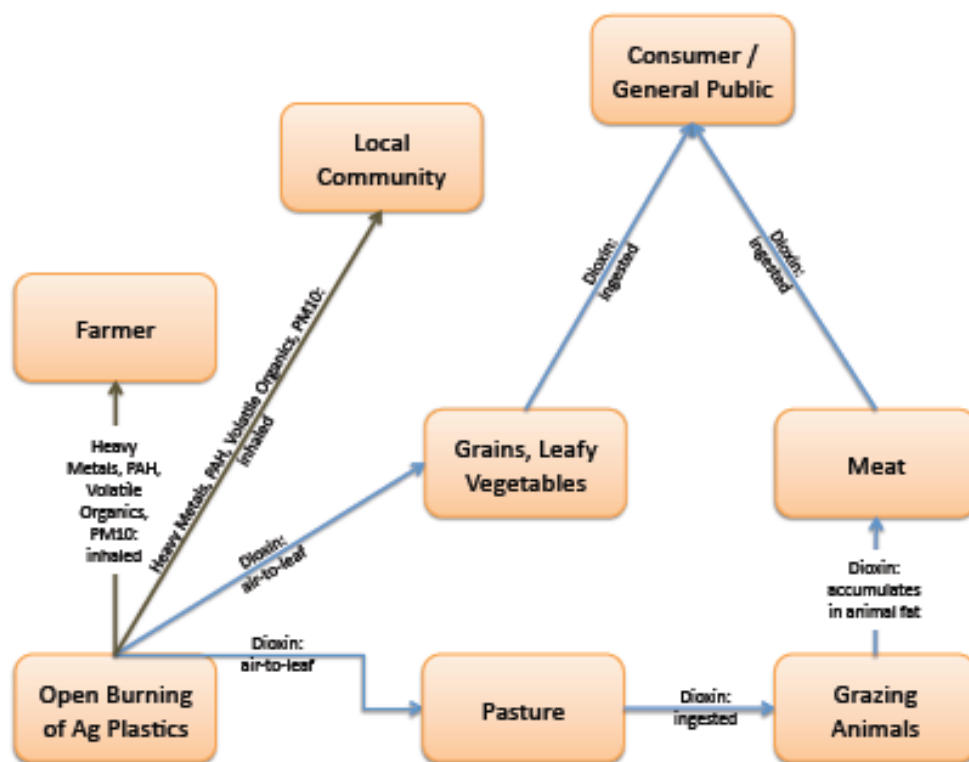


Figure 1: Pathways of Exposure to Pollutants from Burning Ag Plastics

Burning 10,000 pounds of agricultural plastic has the potential to contaminate 75,000 kg of soil from exposure to dioxins, based on Canadian Soil Quality Guidelines (Levitan and Barros, 2003 and Environment Canada, 2010). In Alberta alone, it is estimated that more than 20 million pounds of agricultural plastics are sold annually, and that the predominant method of waste management is open burning (RCA, 2009). If half of this plastic is handled through on-site burning, it has the potential to contaminate 75 million kg of soil, or approximately 7500 truckloads.

Based on this research, as well as the 2007 National Pollutant Release Inventory, burning of 20 million pounds of agricultural plastics could release the equivalent of 6% of Alberta's total inventory of dioxins and furans. The burning of agricultural plastics in Ontario has been estimated to generate 0.8 g TEQ (toxic equivalents) per year of dioxins and furans, representing less than 2% of Ontario's total inventory (Environmental Health Strategies, 2005). Although these numbers seem small, as releases would be concentrated on agricultural land, this may still present human health concerns.

The burning of plastic agricultural plastics is of particular concern to the Great Lakes Basin Watershed. The Great lakes drainage basin is 580,430 km<sup>2</sup> and is home to 95 percent of the surface water in North America along with 21 percent of the world's surface freshwater (Environment Canada, 2005). The dioxins and furans that are released during the incomplete combustion of plastic products pose a serious threat to aquatic species, wildlife, soil fertility, and humans (Krantzberg et al, 2006).

According to the United States Environmental Protection Agency (USEPA) and Environment Canada, dioxins and furans are two of the most critical contaminants in the Great Lakes and identified as Lakewide Management Plan (LaMP) critical pollutants. Both dioxins and furans are carcinogenic and likely play a role in endocrine disruption. These contaminants have been found in Lake Huron fish and wildlife and are also seen in low levels of fish, wildlife, and humans living in or near Lake Ontario. Also, dioxins and furans have been linked to the degradation of Lake Ontario bald eagle, mink, and otter populations. These species are losing fitness and reproductive health due to the levels of dioxins and furans in the area, which exceed human health standards. Additionally, dioxins and furans have been detected in Lake Ontario tributaries and are routinely found in higher levels in the Niagara River. (Human Health and the Great Lakes, 2003)

Dioxins and furans are also considered a Tier 1 pollutant by the Canada-Ontario Agreement Respecting Great Lakes Basin Ecosystem. Being a Tier 1 pollutant suggests the pollutant is a persistent bioaccumulative toxic substance. It is through the "Harmful Pollutants" annex that Canada and Ontario have agreed it is important to eliminate all sources of Tier 1 pollutants. Consequently, this would require all burning of plastic agricultural waste to be suspended.





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Another group of pollutants of concern that are emitted from the burning of plastic agricultural waste are polycyclic aromatic hydrocarbons (PAHs). PAHs are considered a Tier 2 pollutant under the Canada-Ontario Agreement, meaning they have the potential for causing widespread impacts or have already had adverse impacts on the Great Lakes environment. The “Harmful Pollutants” annex calls for a significant reduction in Tier 2 substances.

***On-site burning of household garbage has been identified as the largest source of dioxin emissions in Ontario. According to the USEPA and Environment Canada, dioxins and furans are two of the most critical contaminants in the Great Lakes.***

## Environmental Impacts / Resource Conservation

Disposal of agricultural plastics through either burning or landfilling represents a significant loss of resources, as this material is essentially wasted. Within the Alberta context, recycling the 20 million pounds (~9 000 tonnes) of agricultural plastics that are used annually would represent a net greenhouse gas savings of more than 20,000 tonnes of CO<sub>2</sub> equivalent (ICF, 2005). This equates to removing more than 4000 vehicles from the road for a year, or the amount of carbon sequestered by almost half a million tree seedlings for 10 years.

At the same time, Ontario estimates vary widely, from 4000 tonnes (Black Sheep Strategy, 2010) to 20,000 (Environmental Health Strategies, 2005) tonnes of ag plastics generated annually. Using a mid-range value would result in similar environmental benefits to those outlined for Alberta.



4000 passenger vehicles for one year



Carbon sequestered by 500,000 tree seedlings over 10 years








**Greenhouse Gas Benefits Associated with Recycling Agricultural Plastics in Alberta or Ontario**

## Conclusions

Based on the current disposal practices used for agricultural plastics, and the potential pollution and resource conservation impacts associated with improper disposal practices such as burning, there is a strong national need to develop a comprehensive stewardship program for waste agricultural plastics to address the lack of adequate management systems for these waste products. Required elements of a program include the infrastructure required to collect, process, transport and recycle materials, as well the social marketing, incentive and regulatory supports to drive the required behaviour change.



## Appendix A: Types of Agricultural Plastics

Resin Type	Common Uses	Agricultural Uses
 <b>PET</b> Polyethylene Terephthalate	The most commonly recycled plastics material, PET is primarily used for soft drink bottles.	Rare
 <b>HDPE</b> High Density Polyethylene	HDPE is used in bottles; margarine tubs; and grocery bags. It represents over 50% of the plastic bottle market.	Nursery pots, pesticide and oil containers
 <b>V</b> Polyvinyl Chloride	PVC (or vinyl) is used to manufacture products ranging from heavy walled pressure pipes to crystal-clear food packaging.	Water pipes, hoses
 <b>LDPE</b> Low Density Polyethylene Linear Low Density Polyethylene (LLDPE)	The largest end-use of LDPE is film for bags, such as bread bags, trash bags.	Greenhouse film, mulch film, silage bags  Stretch wrap for silage
 <b>PP</b> Polypropylene	PP is used in products ranging from yarns and fabrics to food packaging.	Nursery pots, rows and trays, shade cloth, row covers, weed barrier Twine
 <b>PS</b> Polystyrene	PS is used in some yogurt cups, egg cartons, meat trays, and disposable utensils. It is also used to make videocassettes and televisions.	Flats, pots, growing mixes
 <b>OTHER</b>	Various other plastics resin types and multi-layered material form this group.	

Source: Ontario Ag, Food and Rural Affairs, 2002

Types of agricultural plastics that have been successfully recycled include (Ontario Ag, Food and Rural Affairs, 2002):

- Plastic Stretch Wrap: A white, tacky linear low-density polyethylene (LLDPE) plastic film wrapped around hay bales to keep them air and moisture tight. Most commonly, bales are triple-wrapped and the plastic is 1 mil in thickness and between 18” and 24” in width.

- Silage Bags (“Ag Bags”): Long tubes of low-density polyethylene (LDPE) plastic used to store hay and corn silage. Typically, they are 8’-9’ wide and 100’-200’ long, 9 mil or thinner in thickness, formed of a bonded white and black layer.
- Cover Sheets for Bunker Silos: Black LDPE plastic film that is used in large sheets typically 20’-40’ wide, 100’-150’ long, and 8-10 mil in thickness, which is used to wrap hay or corn silage in cement bunker silos.
- Greenhouse plastics: Typically LDPE film, used in 50’ wide sheets or 25’ wide tubes, up to 300’ long and 4-6 mil in thickness.
- Commercial Pesticide containers under 23 litres in volume: (not to be confused with domestic pesticides) Typically high density polyethylene (HDPE). The most common size is 10 litres, although various formulations are available in small sizes (500ml) up to 20 litre pails.
- Commercial Pesticide containers over 23 litres in volume: Typically HDPE (although of a different density and melting rate than HDPE than under 23 litres). Sizes vary from small 50 litres in volume up to 1000 litres in volume. Containers are both single use as well as multiple use.
- Fertilizer Containers (liquid) under 23 litres in volume: Same as for commercial pesticide containers.
- Fertilizer Containers (liquid) over 23 litres in volume: Same as for commercial pesticide containers.



## **Appendix B: Emission Factors and Health Impacts Associated with Open Burning of Agricultural Plastics**

### **Emissions from Low Temperature Burning of Plastics**

At temperatures below 750°C, significant pyrolytic degradation of polyethylene (PE) occurs, however, complete combustion of PE would not occur (Wrobel and Reinhardt, 2003). This may provide some insight into the expected emissions from burning PE in an open burning situation. It was speculated that for burning of silviculture piles covered by polyethylene, immediately after pile ignition, especially considering the low thermal conductivity of plastics, the combustion temperature would not be intense enough to heat the PE to a temperature high enough to initiate combustion. Because PE melts and thermally degrades at relatively low temperatures (105 and 180°C), pyrolysates would be formed and emitted before the temperature can rise high enough to ensure more complete combustion. At temperatures below 755°C, as much as 18 to 41 percent of the mass of PE is lost and volatilized prior to particle ignition. (Wrobel and Reinhardt, 2003)

In the context of open burning, PE pyrolysis chemistry would likely be of far greater importance than combustion chemistry. In the case of silviculture piles, the temperature of the pile surface would rise from ambient to about 1000°C over roughly one to five minutes. Thus, the PE is likely to undergo thermal degradation and melt during the early stage of combustion, when the pile temperature is between 250 and 600°C. These temperatures are not high enough to allow PE combustion. The emissions from this early phase of the pile burn would contain a high percentage of aliphatic hydrocarbons and radicals, as well as a low percentage of aromatic and polycyclic aromatic hydrocarbons (PAHs). As the biomass pyrolysis and oxidation rates accelerate, the temperature of the pile will increase high enough to make PE combustion an important process, but by this time most, if not all of the PE would have already been pyrolyzed and lost to the atmosphere. (Wrobel and Reinhardt, 2003)

To get a sense of the potential impact of open burning of agricultural plastics, research done by Cornell University suggests that recycling 10,000 pounds (~4500 kg) of agricultural film (and subsequently avoiding that same amount of open burning) would reduce dioxin emissions by 0.3 mg toxic equivalents (TEQ). At the same time, the Canadian Soil Quality Guidelines (CSoQG) for dioxins and furans is 4 nanograms of dioxin and furan TEQs per kilogram of soil (Environment Canada, 2010). Equating the Cornell research with soil quality guidelines implies that burning 10,000 pounds of agricultural plastic has the potential to contaminate 75,000 kg of soil from exposure to dioxins.

**Emissions Released/ Tonne of Plastic Burned**

	<u>Product</u>	<u>Mass ratio (mg/kg)</u>	<u>Units</u>	<u>Emissions/ Tonne</u>	<u>Units</u>	<u>Source</u>	<u>Conflicting Sources</u>
VOCs	Benzene	0.0478	mg/kg plastic	47.8	mg	USEPA 1992 and Reinhardt 2003	
	Toluene	0.0046	mg/kg plastic	4.6	mg	USEPA 1992 and Reinhardt 2003	6mg/kg (Lemieux 2004)
	Ethyl Benzene	0.0012	mg/kg plastic	1.2	mg	Reinhardt 2003	
	Xylene	0	mg/kg plastic	0	mg	Lemieux 2004	
	Styrene	40	mg/kg plastic	40	g	Lemieux 2004	
	PAHs	935.95	ug/kg plastic	935.95	mg	USEPA 1992	
	Dioxins and Furans			0.067	TEQ	Cornell University	
	1-Hexene	0.0043	mg/kg plastic	4.3	mg	Reinhardt 2003	
	Carbon Monoxide	175000	mg/kg plastic	175	kg	Reinhardt 2003	
	Particulates (PM <sub>10</sub> )	19000	mg/kg plastic	19	g		

Total Canadian dioxin/furan emissions = 200 g TEQ/year (CCME, 2001).  
Canada-Wide Standard for Dioxins and Furans

Dioxin/ Furan releases reported for Alberta ~ 10 g TEQ/year (Env Canada, 2010)  
[http://ec.gc.ca/pdb/websol/emissions/ap/ap\\_result\\_e.cfm?year=2007&substance=df&location=AB&sector=&submit=Search](http://ec.gc.ca/pdb/websol/emissions/ap/ap_result_e.cfm?year=2007&substance=df&location=AB&sector=&submit=Search) 2007 Dioxins and Furans (D/F)  
Emissions for Alberta. 2007 National Pollutant Release Inventory

20 million pounds of ag plastic / 10,000 pounds \* 0.3 mg TEQ = 600 mg TEQ =  
0.6 g TEQ = 6% of total Alberta releases



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Benzo(a)pyrene:  $9.65 \text{ ug/kg} * 9,000,000 \text{ kg (20,000,000 lbs)} / 1,000,000 = 87 \text{ g} = 0.016\%$  of Alberta sources (excluding natural sources)

Benzo (k) fluouranthene:  $2.51 \text{ ug/kg} = 23 \text{ g} = 0.007\%$  of Alberta sources (excluding natural sources)

Benzo (b) fluouranthene:  $9.25 \text{ ug/kg} = 83 \text{ g} = 0.011\%$  of Alberta sources (excluding natural sources)

Benzo(A)pyrene:  $7.53 \text{ ug/kg} = 68 \text{ g} = 0.013\%$  of Alberta sources (excluding natural sources)

Indenopyrene:  $10.7 \text{ ug/kg} = 96 \text{ g} = 0.04\%$  of Alberta sources (excluding natural sources)

The following tables show emission factors for burning plastic film obtained during tests performed by the US Environmental Protection Agency.

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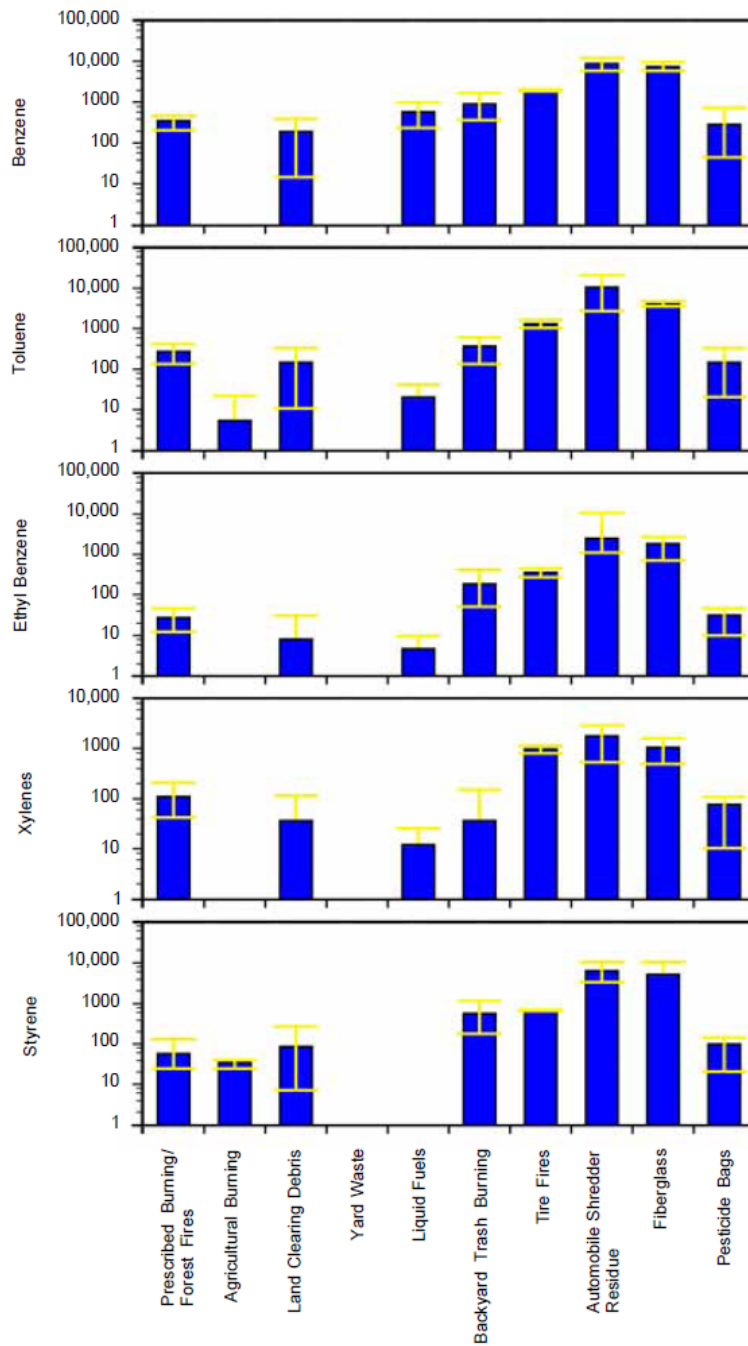


Figure 1. VOCs from Open Burning Sources (mg/kg burned material)

Source: Lemieux, 2004





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**Emission Factors for Organic Compounds From Burning Plastic Film<sup>a</sup>**

**Emission Factor Rating: C**

Pollutant	Units	Condition of plastic			
		Unused Plastic		Used Plastic	
		Pile <sup>b</sup>	Forced air <sup>c</sup>	Pile <sup>b</sup>	Forced air <sup>c</sup>
Benzene	(mg/kg plastic)	0.0478	0.0288	0.0123	0.0244
	(lb/1000 tons plastic)	0.0955	0.0575	0.0247	0.0488
Toluene	(mg/kg plastic)	0.0046	0.0081	0.0033	0.0124
	(lb/1000 tons plastic)	0.0092	0.0161	0.0066	0.0248
Ethyl benzene	(mg/kg plastic)	0.0006	0.0029	0.0012	0.0056
	(lb/1000 tons plastic)	0.0011	0.0058	0.0025	0.0111
1-Hexene	(mg/kg plastic)	0.0010	0.0148	0.0043	0.0220
	(lb/1000 tons plastic)	0.0020	0.0296	0.0086	0.0440

<sup>a</sup>Reference 22

<sup>b</sup>Emission factors are for plastic gathered in a pile and burned.

<sup>c</sup>Emission factors are for plastic burned in a pile with a forced air current.

(Source: USEPA, 1992)

Note: These two sources appear to disagree by several orders of magnitude.

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**Polycyclic Aromatic Hydrocarbon Emission Factors from Open Burning of Agricultural Plastic Film<sup>a</sup>**  
**Emission Factor Rating: C**

Pollutant	Units	Condition of Plastic			
		Unused plastic		Used plastic	
		Pile <sup>b</sup>	Forced air <sup>c</sup>	Pile <sup>b</sup>	Forced Air <sup>c,d</sup>
Anthracene	(ug/kg plastic film)	7.14	0.66	1.32	0.40
	(lb/1000 tons plastic film)	0.0143	0.0013	0.0026	0.0008
Benzo(A)pyrene	(ug/kg plastic film)	41.76	1.45	7.53	0.00
	(lb/1000 tons plastic film)	0.0835	0.0029	0.0151	0.0000
Benzo(B)fluoranthene	(ug/kg plastic film)	34.63	1.59	9.25	0.93
	(lb/1000 tons plastic film)	0.0693	0.0032	0.0185	0.0019
Benzo(e)pyrene	(ug/kg plastic film)	32.38	1.45	9.65	0.00
	(lb/1000 tons plastic film)	0.0648	0.0029	0.0193	0.0000
Benzo(G,H,I)perylene	(ug/kg plastic film)	49.43	2.11	14.93	0.00
	(lb/1000 tons plastic film)	0.0989	0.0042	0.0299	0.0000
Benzo(K)fluoranthene	(ug/kg plastic film)	13.74	0.66	2.51	0.00
	(lb/1000 tons plastic film)	0.0275	0.0013	0.0050	0.0000
Benz(A)anthracene	(ug/kg plastic film)	52.73	2.91	14.41	1.19
	(lb/1000 tons plastic film)	0.1055	0.0058	0.0288	0.0024
Chrysene	(ug/kg plastic film)	54.98	3.70	17.18	1.19
	(lb/1000 tons plastic film)	0.1100	0.0074	0.0344	0.0024
Fluoranthene	(ug/kg plastic film)	313.08	53.39	107.05	39.12
	(lb/1000 tons plastic film)	0.6262	0.1068	0.2141	0.0782
Indeno(1,2,3-CD)pyrene	(ug/kg plastic film)	40.04	2.78	10.70	0.00
	(lb/1000 tons plastic film)	0.0801	0.0056	0.0214	0.0000
Phenanthrene	(ug/kg plastic film)	60.40	12.56	24.05	8.72
	(lb/1000 tons plastic film)	0.1208	0.0251	0.0481	0.0174
Pyrene	(ug/kg plastic film)	203.26	18.24	58.81	5.95
	(lb/1000 tons plastic film)	0.4065	0.0365	0.1176	0.0119
Retene	(ug/kg plastic film)	32.38	2.91	18.77	3.04
	(lb/1000 tons plastic film)	0.0648	0.0058	0.0375	0.0061

<sup>a</sup>Reference 22.

<sup>b</sup>Emission factors are for plastic gathered in a pile and burned.

<sup>c</sup>Emission factors are for plastic burned in a pile with a forced air current.

<sup>d</sup>0.00 values indicate pollutant was not found.

(Source: USEPA, 1992)



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## 1-Hexene (Alpha-Olefin C6)

Alpha olefin is an olefin featured by the position of double bond (reactive unsaturation) at the two end carbons in carbon chains. Alpha olefins and their derivatives are used as comonomers in the production of polyethene. High density polyethene (HDPE) and linear low density polyethene (LLDPE) use approximately 2–4% and 8–10% of comonomers. (chemicalland21, 2010)

Specific health impacts of 1-Hexene were not identified.

## Benzene

Benzene is a chemical that is often used in manufacturing. In its most common form, benzene is a liquid that is clear, slightly sweet smelling, and highly combustible. Benzene is frequently used in manufacturing rubber, paint, plastics, resins, drugs, pesticides, synthetics, and other products. It is also present in gasoline and tobacco smoke.

A known carcinogen, benzene can be harmful to those exposed to it over an extended period of time. It evaporates quickly in air and is partially soluble in water. Benzene exposure is most dangerous when it occurs over a long period of time or when the concentration of benzene to which a person is exposed is very high. Contact with low to moderate levels of benzene for a short time can cause headaches, vomiting, disorientation, shakiness, elevated heart rate, and loss of consciousness. Very high levels of exposure can be fatal. People who work with benzene or who are exposed to it over a long period of time are at the highest risk for developing benzene-related illnesses, which range from anemia to cancer. (Benzene FYI, 2010)

## Carbon Monoxide

Carbon monoxide is an odorless, colorless and toxic gas. Because it is impossible to see, taste or smell the toxic fumes, CO can kill you before you are aware it is in your home. At lower levels of exposure, CO causes mild effects that are often mistaken for the flu. These symptoms include headaches, dizziness, disorientation, nausea and fatigue. The effects of CO exposure can vary greatly from person to person depending on age, overall health and the concentration and length of exposure. (USEPA, 2010)

CO interferes with the blood's ability to carry oxygen to the brain, heart and other tissues. Depending on the amount inhaled, CO can slow reflexes and cause fatigue, headache, confusion, nausea, and dizziness and in large amounts can cause death by suffocation. (RDOS, 2006)

## Dioxins

The composition of domestic waste and combustion conditions determine the extent of dioxin formation. Because these determinants vary over broad ranges, there are no universally applicable emission factors for dioxin releases to air, land or residues for open burning of domestic waste (Costner, 2006). However, there is generally enough chlorine in the waste stream, even from natural materials such as salt and wood, to generate dioxins when garbage is burned. The smoldering, high particulate combustion of open burning offers ideal conditions for dioxin formation. (Great Lakes Binational Toxics Strategy, 2004)

Dioxins are one of the emissions of greatest concern even in very small quantities, and are associated with disruption of multiple endocrine pathways, increased risk for ischemic heart disease, cognitive and motor disabilities, and endometriosis. They are also listed as a “known human carcinogen” in the 10th edition of the National Toxicology Program’s Report on Carcinogens (2002). Emerging research in animals and humans suggests that exposure to dioxins early in life may increase risk of breast cancer. (Levitan and Barros, 2003)

## Ethylbenzene

Ethylbenzene is a colorless liquid found in a number of products including gasoline and paints. It is naturally found in coal tar and petroleum and is also found in manufactured products such as inks, pesticides, and paints. Ethylbenzene is used primarily to make another chemical, styrene. Other uses include as a solvent, in fuels, and to make other chemicals.

Breathing very high levels of ethylbenzene can cause dizziness and throat and eye irritation. Breathing lower levels has resulted in hearing effects and kidney damage in animals. Exposure to high levels of ethylbenzene in air for short periods can cause eye and throat irritation. Exposure to higher levels can result in dizziness. Irreversible damage to the inner ear and hearing has been observed in animals exposed to relatively low concentrations of ethylbenzene for several days to weeks. Exposure to relatively low concentrations of ethylbenzene in air for several months to years causes kidney damage in animals. The International Agency for Research on Cancer (IARC) has determined that ethylbenzene is a possible human carcinogen. (patientsville, 2010)

## Particulates

Particulate emissions from open burning have been associated with many health effects, including increased risk of stroke (Levitan and Barros, 2003). Increased levels of small particulate are responsible for a marked increase in Emergency Room visits, hospitalizations, and days lost from school and work. Small particle pollution from the combustion of organic materials is an extremely serious health



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threat - it poses much more of a danger to human health than present levels of other common air pollutants such as ozone, sulfur dioxides and carbon monoxide. connected exposure to increased levels of fine particulates with a significant rise in the number of premature deaths from respiratory and heart disease. (RDOS, 2006)

**Polycyclic Aromatic Hydrocarbons (PAHs):  
(Anthracene , Benzo(A)pyrene, Benzo(B)fluoranthene,  
Benzo(e)pyrene, Benzo(G.H.I)perylene, Benzo(K)fluoranthene,  
Benz(A)anthracene, Chrysene, Fluoranthene, Indeno(1.2.3-  
CD)pyrene, Phenanthrene, Pyrene, Retene)**

PAHs are a group of chemicals that are formed during the incomplete burning of coal, oil, gas, wood, garbage, or other organic substances, such as tobacco and charbroiled meat. There are more than 100 different PAHs. PAHs generally occur as complex mixtures (for example, as part of combustion products such as soot), not as single compounds. A few PAHs are used in medicines and to make dyes, plastics, and pesticides. Others are contained in asphalt used in road construction. They can also be found in substances such as crude oil, coal, coal tar pitch, creosote, and roofing tar. They are found throughout the environment in the air, water, and soil. They can occur in the air, either attached to dust particles or as solids in soil or sediment.

PAHs can be harmful to human health under some circumstances. Several of the PAHs, including benz[a]anthracene, benzo[a]pyrene, benzo[b]fluoranthene, benzo[j]fluoranthene, benzo[k]fluoranthene, chrysene, dibenz[a,h]anthracene, and indeno[1,2,3-c,d]pyrene, have caused tumors in laboratory animals when they breathed these substances in the air, when they ate them, or when they had long periods of skin contact with them. Studies of people show that individuals exposed by breathing or skin contact for long periods to mixtures that contain PAHs and other compounds can also develop cancer. Animal studies also show reproductive and immune system issues. (ATSDR, 2010)

**Sulfur Dioxide**

Health effects are irritation of the upper respiratory tract, eye irritation and shortness of breath. (RDOS, 2006)

**Toluene**

Toluene is a clear, colorless liquid with a distinctive smell. Toluene occurs naturally in crude oil and is also produced in the process of making gasoline and other fuels from crude oil and making coke from coal. Toluene is used in making

paints, paint thinners, fingernail polish, lacquers, adhesives, and rubber and in some printing and leather tanning processes. (patientsville, 2010)

Toluene produces reversible effects on the liver, kidneys, and nervous system; the nervous system appears to be most sensitive to its effects. The physiologic effects of toluene depend on the concentration and length of exposure. Toluene's anesthetic action can result in rapid central nervous system depression and narcosis at high concentrations. Volatilization after ingestion and hypoxia after aspiration can contribute to CNS toxicity, and aromatic impurities in commercial toluene-containing products can have added neurotoxic effects. (ATSDR, 2010)



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Our Reference: 1.b.1



Basil Chamberlain  
Chief Executive  
Taranaki Regional Council  
Private Bag 713  
STRATFORD 4352  
By email: [info@trc.govt.nz](mailto:info@trc.govt.nz) ('Long-Term Plan submission' in subject field)

6 April 2018

**SUBMISSION TO THE TARANAKI REGIONAL COUNCIL'S 2018/2028 LONG-TERM PLAN BY TE KOTAHITANGA O TE ATIAWA TRUST**

Tēnā koe Basil,

1. On behalf of Te Kotahitanga o Te Atiawa Trust (the Trust) and Hapū of Te Atiawa Iwi (Hapū) we appreciate the opportunity to provide comment on Taranaki Regional Council's (TRC) 2018/2028 Long-Term Plan (LTP).
2. **Te Atiawa Area of Interest**  
The Te Atiawa Iwi Claims Settlement Act 2016 recognises the Te Atiawa rohe which extends from Te Rau o Te Huia along the coast to the Herekawe Stream, inland to Tahuna Tutawa, east to Whakangerengere, northeast to Taramoukou, north back to Te Rau o te Huia and offshore out to 12 nautical miles. Te Atiawa has occupied this rohe for well over a millennium. This area of interest encompasses the Coastal Marine Area, part of Maunga Taranaki and overlaps with rohe of five whanaunga iwi including Ngāti Mutunga (north-east), Ngāti Maru (east), Ngāti Ruanui (south), Ngāruahine (south) and Taranaki (west). Given this, the Trust and Hapū respond to any relevant proposals, resource consent applications and policies within, adjacent to, or impacting directly on this area of interest.
3. **Ramping up biodiversity protection - Towards a predator-free Taranaki**  
The Trust and Hapū support the TRC's preferred option to implement the proposed first three years of a region wide predator control programme, focusing on the Waiwhakaiho catchment, around Mt Taranaki and trialling possum eradication.

A: 35 Leach Street, New Plymouth / PO Box 1097 Taranaki Mail Centre | p: 06 7584685 |  
e: [sera@teatiawa.iwi.nz](mailto:sera@teatiawa.iwi.nz)

Our Reference: 1.b.1

4. **Key native ecosystems and biodiversity plans**

The Trust and hapū support the TRC's programme of working with interested landowners, iwi, community groups and organisations such as QEII and Fish & Game to voluntarily protect and enhance the ecological values of key native ecosystems.

5. **Extending our existing programmes - Freshwater quality monitoring**

The Trust and hapū support the TRC's intention to commit more resources to freshwater monitoring in order to meet the requirements of the NPS-FM is supported.

6. **Extending existing programmes – Education**

The Trust and Hapū support the TRC's intention to promote long-term action on sustainability and environmental protection by funding a regional position for the Enviroschools organisation.

7. **Working Together with Māori**

The Trust and Hapū support the TRC working together with Māori including Māori involvement in decision making processes and encourage the TRC to invest funds into a co-designed and resourced Memorandum of Understanding and Mana Whakahono a Rohe Agreement. Further to this, we encourage the TRC to invest funds into operationalising these objectives through co-designed and resourced policy and consent processes. The matters which are of particular interest to the Trust and Hapū, and potential solutions, are outlined below:

**Foundations of a relationship**

- a. The Trust and Hapū support this objective subject to integrating Māori cultural values into the forefront of the Plan, which will provide the foundation of this relationship. Further to this, we encourage the TRC to invest funds into the TRC councillors, and Council senior management and staff participating in training facilitated by iwi to understand the meaning of these values.

**Policy development**

- b. The Trust and Hapū support this objective and encourage the TRC to invest funds into resourcing a co-designed engagement model to enable us to contribute to policy processes, and this model is included as an obligation of the Memorandum of Understanding and Mana Whakahono a Rohe Agreement.

Iwi/hapū engagement models have been successful in many regions around New Zealand, for example iwi/hapū environmental units where Councils make annual financial contributions to the unit to assess resource management consents and policies like that of well-established units - Te Ao Mārama Inc and Mahaanui Kurataiao Ltd and/or a pay-as-you-go

Our Reference: 1.b.1

engagement model similar to New Plymouth District Council's Ngā Kaitiaki rūpū.

**Resource consents process**

- c. The objective to "Continue and further develop best practice in resource consent processing and administration" is supported and we encourage the TRC to invest funds into a co-designed and resourced consent process to ensure that each of the steps stated within the Plan and outlined below are conducted by the TRC in a manner that Māori values are recognised and weighted appropriately in the decision-making process. The steps mentioned, and proposed amendments, (deletions are ~~striketrough~~ and additions are underlined) are as follows:
- encourage applicants to consult where Māori may be an ~~interested~~ affected party, as part of an assessment of environmental effects;
  - ensure that sufficient information is provided by applicants on any actual or potential effects on Māori;
  - consider extending resource consent processing periods to enable adequate consultation and possible resolution of issues with Māori;
  - have regard to the effects on Māori in assessing whether resource consent applications are to be notified or non-notified and require applicants to obtain written approval to non-notification where Māori are an affected party including with particular regard to statutory acknowledgements arising from Treaty of Waitangi settlements with iwi;
  - provide information and technical assistance on resource consents and resource consent processing and administration;
  - arrange and facilitate meetings and undertake other forms of consultation with Māori as part of resource consent processing and administration;
  - hold meetings and pre-hearing meetings on marae as appropriate;
  - arrange interpretation services for the presentation of evidence in Māori when requested;
  - exclude the public from a hearing and restricting the publication of evidence when necessary to avoid serious offence to tikanga Māori or to avoid the disclosure of the location of wāhi tapu; and
  - ~~consider the~~ provide for participation of Māori in resource consent monitoring, including input into the design of monitoring programmes and involvement in monitoring activities.

**Ongoing engagement**

- d. The Trust and Hapū support the TRC's objectives for ongoing engagement with Māori and encourage the TRC to invest funds into a co-designed and resourced Memorandum of Understanding, Mana Whakahono a Rohe Agreement and policy and consent processes (as mentioned above).

**Representation**

A: 35 Leach Street, New Plymouth / PO Box 1097 Taranaki Mail Centre | p: 06 7584685 |  
e: [sera@teatiawa.iwi.nz](mailto:sera@teatiawa.iwi.nz)

Our Reference: 1.b.1

- e. The Trust and Hapū support the TRC's commitment to establishing and supporting the Māori representatives on the Councils Policy and Planning and Consents and Regulatory Committees. With that being said, the Trust and Hapū require that the TRC extend the timeframe with which Māori representatives receive the meeting papers and agendas from 2 days to at least 10 days in advance of the meeting date. This will allow time for the Māori representatives and iwi kaimahi or staff to convene and discuss the meeting items.

**Information management**

- f. The Trust and Hapū support the TRC's objectives around information management.

**Training**

- g. The Trust and Hapū support the TRC's desire to complete tikanga Māori training. As stated above, the foundation of the relationship between the TRC and Māori should be founded on Māori cultural values and the TRC councillors, and funds should be invested into Council senior management and staff participating in training facilitated by Māori to understand the meaning of these values.
- h. The Trust and Hapū support the TRC's objectives to provide opportunities for Māori to gain experience, training and skill development within the Council's work programmes and activities. Further to this, the Trust and Hapū require that these opportunities form part of the co-designed and resourced Memorandum of Understanding and Mana Whakahono a Rohe Agreement.

**Resources**

- i. The Trust and Hapū support the TRC's objectives in relation to resources.

**Review**

- j. The Trust and Hapū require an annual review of the effectiveness of the TRC's policies and the co-designed and resourced Memorandum of Understanding, Mana Whakahono a Rohe Agreement and policy and consent processes.

**8. Monitoring and Reporting**

The Trust and Hapū require that the TRC's integrate the Te Ao Māori perspective/Māori worldview, Māori cultural values and mātauranga Māori monitoring techniques (e.g Cultural Health Index) into the monitoring framework and encourage the TRC to invest funds into the development of this. This will provide a strong foundation for this framework and its operation, and will provide long-lasting cultural integrity.

The Trust and Hapū require that the TRC include this frameworks mātauranga Māori monitoring results into the performance and compliance monitoring

Our Reference: 1.b.1

reports and state of the environment monitoring reports and encourage the TRC to invest funds into this.

9. **Resource Management - Levels of Service**

The Trust and Hapū require that the TRC integrate mātauranga Māori parameters (as mentioned above) into the measures for levels of service 1-9. Each of these levels of service or environmental resources are important to us, particularly freshwater life-supporting capacity, quality and allocation.

10. **Activities – What we plan to do - Resource investigations and projects**

The Trust and Hapū require that the TRC support the development of an iwi-led Te Ao Māori framework (as mentioned above) and encourage the TRC to invest funds into its development.

11. **Conclusion**

The Trust do not wish to be heard in relation to this submission.

Nāku, nā



Hemi Sundgren  
Pouwhakahaere / Chief Executive  
Te Kotahitanga o Te Atiawa Trust

**Joe Mack**

---

**From:** noreply@mailgun.trc.govt.nz  
**Sent:** Sunday, 8 April 2018 11:17 PM  
**To:** Mike Nield  
**Subject:** Online submission on Long-Term Plan 2018-2028

**Title**

Mrs

**If other, please specify**

**First name**

Judith

**Surname**

Hill

**Organisation (if applicable)**

**Full postal address, including rural delivery and postcode**

26 Cowling Rd  
New Plymouth  
430

**Phone (daytime)**

06 7533423

**Mobile**

0273911718

**Email address**

judith@hillphotos.co.nz

**I wish to present my submission personally at a hearing scheduled for 7 May**

No

**Your submission**

**Towards predator-free Taranaki**

**Do you think the Council should implement the first three years of a region-wide predator control programme, as outlined?**

**Comment**

**Pukeiti/Taranaki Crossing**

**Do you think the Council should undertake a range of new developments at and linked to Pukeiti, as outlined?**

No

**Comment**

Mountain biking is not a suitable activity in the national park.  
Too destructive of habitat.  
Project far too expensive.  
Money better spent maintaining existing tracks to suitable state.

**Other proposed changes**

**Comment**

**Additional comments**

**Additional comments explanation**

**Comment**

**Document 1**

**Document 2**

**Document 3**

**Document 4**



6 April 2018  
Document: 2030404

Mr Basil Chamberlain  
Chief Executive  
Taranaki Regional Council  
Private Bag 713  
Stratford

**Taranaki Regional Council**  
Document No:

**- 9 APR 2018**

Document No of Reply:

C/- Taranaki Regional Council  
47 Cloten Road  
Private Bag 713  
Stratford 4352  
P: 06 765 7127  
E: info@trc.govt.nz

Dear Mr Chamberlain

## **2018/2028 Long-Term Plan Submission**

Thank you for the opportunity to comment and provide a submission on the Council's Consultation Document and supporting documentation for the 2018/2028 Long-Term Plan.

The Trust is a 100% council controlled organisation. It owns the Yarrow Stadium assets. The assets are managed and operated by the New Plymouth District Council under a management agreement with the Trust. The Council provides annual funding (\$876,000 p.a. to date) for the long-term maintenance and development of Yarrow Stadium.

In 2017, the Trust and the Council commenced discussions to increase the annual funding for Trust from \$876,000 p.a. to \$1.25m p.a. This was to allow for the full range of projects in the 2018/2028 Yarrow Stadium asset management plans to be funded. These discussions stopped once the preliminary results of a seismic assessment of the East Stand indicated that the Stand was approximately 10% of new building standard. This assessment has rendered the stand unusable.

There are two main programmes of work going forward. The first is a recovery plan to get the Stadium operational for the full range of users and, in particular, for the hosting of rugby games for the 2018 National Provincial Championship. The second programme of work is the fixing of the problems identified in the seismic assessment of the East Stand. This submission focuses on the first programme of work namely, the recovery programme.

The Council has considered and approved a recovery programme. The funding of the recovery programme has been agreed from the following sources:

- the balance of the 2017/2018 Council funding to the Trust
- the balance of the 2018/2019 Council funding after the payment of unavoidable costs (interest, insurance, audit fees etc)
- 50:50 split between the New Plymouth District Council and the Taranaki Regional Council (via the Taranaki Stadium Trust) for the remaining portion of the recovery plan.



To address the Taranaki Regional Council's share of the funding identified in the last bullet point above, the Trust recommends that the Council consider increasing its funding for Yarrow Stadium to the \$1.25m level discussed in 2017. Further, the Trust recommends that the funding policies identified in the Council's Revenue and Financing Policy be applied for this increased level of funding. This Policy applies a rating model that recovers 78% of the funding from the New Plymouth and North Taranaki constituencies, 5% of the funding from the Stratford constituency and 17% of the funding from the South Taranaki constituency. The current funding model is a portion of the UAGC for all ratepayers at \$11. A land value based differential targeted rate over the New Plymouth and North Taranaki constituencies is used to increase the level of funding to the 78% identified above. In these two constituencies, commercial and industrial ratepayers pay the equivalent of \$100 per property and all other ratepayers pay the equivalent of \$20 per property.

The Trust does not wish to be heard in support of this submission.

Once again, thank you for the opportunity to submit on the Consultation Document for the 2018/2028 Long-Term Plan.

Yours faithfully



M J Nield  
Trustee

## ELTHAM/KAPONGA COMMUNITY BOARD

*'Working together to make the Eltham/Kaponga ward a better place to live, work and play.'*

---

9 April 2018

Chief Executive  
Taranaki Regional Council  
Private Bag  
STRATFORD

### Submission to Long Term Plan

Dear Sir

We would like to make a submission for the construction of a walkway from the Kaponga Township to Hollards Gardens.

As you will see in the supporting proposal, this has strong support from the Kaponga community. It has been on their 'wish list' for a number of years.

With the Regional Council's interest in Hollards Gardens we feel this is a unique opportunity to further promote and develop community involvement in your ongoing work and programmes.

To quote part of your mission statement for Recreation, Culture and Heritage; '*ensure that Tupare, Hollard Gardens and Pukeiti are maintained as regionally significant recreational and heritage amenities*'.

I am happy to speak to this submission, along with a representative of the Kaponga Progressive Group.

Thanks very much

Maree Liddington  
Chairperson  
Eltham Community Board

## **Construction of a Walkway from Kaponga Township to Hollards Gardens.**

**Background.** For many years the community of Kaponga has requested a walkway from the township to Hollards Gardens. Records show that a public meeting run by the Community Development Unit of STDC, in 2008, prioritised this.

For one reason or another the proposal never went ahead.

Now, in the latest public meeting, 'Fly your Ideas', the idea has come forth again.

### **Why have a walkway?**

- There are few places to walk or run around the town apart from the rugby ground. Footpaths are the only other option.
- Country roads aren't safe, with long grass verges and traffic hazards
- Kaponga Primary School & St Patricks School are near to the walkway.
- Hollards Gardens is becoming increasingly popular for botanical education, picnics, fairs and concerts.
- Dog owners would benefit and animals would be exercised out of town boundaries.
- A draw card for visitors.

### **NZ Walkways Act 1990** (now under the Walking Access Act 2008)

The general intent of this statute is to provide 'walking tracks over public and private land so that the people of New Zealand shall have safe, unimpeded foot access to the country side for the benefit of physical recreation as well as for the enjoyment of the outdoor environment and the natural and pastoral beauty and historical and cultural qualities of the area they pass through.' In other words, to provide a legal means of walking access to and/or through public and private land, while still protecting the rights of landowners.

**Concept** To create a walkway similar in construction to the Denby Road walkway. Tanalised timber edging and support, in filled with chip metal & sealed.



Distance is approx 3.5 km. (1 km comes into the Stratford District)

### **End of footpath past Kaponga Primary School**

**Local Bodies with an Interest in this Proposal:**

South Taranaki District Council – administers/maintains 2.5km of Manaia Road, from Kaponga Town boundary to Stratford District.

Stratford District Council - administers/maintains 1.0km of Manaia Road, from South Taranaki boundary to Hollards Gardens.

Taranaki Regional Council – administers Hollards Gardens.

Consent and cooperation from all these bodies would have to be sought.

**Kaponga groups that would be impacted by a walkway:**

Kaponga Primary School – the school could use the walkway for school trips/ educational excursions to Hollards Gardens. This would greatly improve the accessibility of the gardens as an educational/ recreational asset.

St. Patricks School – as above

Kaponga Playcentre. - as above.

Taranaki Swiss Social Club Inc.

Kaponga residents – there are no walkways near the township for dog walking & jogging. This would be a great incentive for people to exercise their dogs away from town and to enjoy a fitness regime outdoors.

Kaponga Businesses – Kaponga would be a 'starting point', for a trip to Hollards Gardens. Meals, drinks and refreshments would be in demand from visitors.

And many other groups.....

Letters of Support have been received from:-

Kaponga Primary School; Taranaki Swiss Social Club Inc.  
Lions Club of Kaponga; Kaponga Playcentre  
Kaponga Hotel; Kaponga Stationhouse Accomodation  
Okaiawa Preschool; Kaponga Amateur Athletics  
Shirley Hazelwood QSM; Kaponga Cooperating Parish  
Eltham/Kaponga Community Board.

## PUKEITI RHODODENDRON TRUST

---

*2290 Carrington Rd., New Plymouth, New Zealand.*

All Correspondence to:

The Secretary,

P O Box 1066, New Plymouth 4340

Email: [pukeiti@pukeiti.co.nz](mailto:pukeiti@pukeiti.co.nz)

14 April 2018

2018/2028 Long-Term Plan Submission  
The Chief Executive  
Taranaki Regional Council,  
Private Bag 713  
STRATFORD 4352

Dear Sir,

### **Re 2018/28 Long Term Plan**

On behalf of the Pukeiti Rhododendron Trust Inc. I am writing in support of the TRC proposals for the 2018/28 Long Term Plan particularly in relation to Pukeiti.

Before proceed I wish to apologise for the lateness of this submission and hope it can still be considered .

The Trust fully supports the Taranaki Crossing project and what is proposed from it for Pukeiti. It can envisage this project continuing to attract visitors at a steady rate across all seasons.

Other projects highlighted for completion during the coming six years such as the carpark extension, enhanced landscaping projects and new features to attract children are also fully supported. Also supported is the commitment to complete the outer tracks and lookout as well as establishing a family tramping hut within Pukeiti.

At the time of writing this submission the new Lodge construction is well advanced and the PRT look forward to its completion later in the year. The PRT would like to commend the TRC on the consultation process undertaken with us to arrive seamlessly on an agreed design. The PRT has contributed \$200,000 towards the fit out of the Lodge.

The Trust continues to support the TRC statement of positioning Pukeiti as “an international garden and rainforest experience”. As I have stated in previous submissions, Pukeiti already ranks within the top three gardens internationally for its Rhododendron collection.

It is the Trust’s strong belief that it is the plant collection that makes Pukeiti unique over and above anything else. To this end the Trust has made comment to TRC staff on the TRCs Pukeiti Asset Management Plan 2018 - 28 and now looks forward to strengthening our partnership with TRC to support the Pukeiti AMP particularly through the Gardens Forum group.

The Trust is well aware that visitors also need good quality facilities and other recreational opportunities as “added value” experiences when they visit Pukeiti and indeed to keep them coming back. It’s heartening to see in excess of 60,000 visitors enjoying Pukeiti last year.

The PRT has engaged Massey University to prepare an Ex-situ Rhododendron Conservation Strategy for New Zealand. The project has taken the best part of 3 years and is now almost complete. The aim of this project is to identify what Rhododendron species exists in New Zealand collections both public and private and which of those were critically endangered in the wild. Final recommendations will focus on how we can utilise this data to determine how best to assist with conserving these endangered plants in New Zealand.

As Pukeiti holds the third largest collection of Rhododendrons in the world it is logical that Pukeiti already holds a significant collection of these endangered Rhododendrons. PRT would like to work with TRC where practicable to support recommendations from the Ex-situ Conservation Strategy that would enhance the existing collection at Pukeiti.

The Trust continues with regular dialogue with Council Managers on how we can assist the TRC with continued improvements to Pukeiti.

From the PRTs perspective none of these things would exist if it wasn’t for the garden itself – it is our view Pukeiti exists for the garden and the various collections within that garden while the surrounding rainforest provides the framework and setting for the garden. This is summed up very well within the Asset Management Plan page 18 – where it states that - *“Any future facility developments in the garden are designed to ensure that the integrity of the garden and rainforest is not compromised and they add value to the visitor experience.”*

In summary,

The Pukeiti Rhododendron Trust supports the 2018-2028 Long Term Plan as it relates to Pukeiti, particularly bullet point two on page 7.

The Trust appreciates that these proposals will continue to position Pukeiti as a world class rhododendron garden and rainforest experience and to ensure Pukeiti remains a Rhododendron collection and conservation hub.

That the PRT and TRC work together where practicable on implementing relevant recommendation from the PRT Ex-situ Rhododendron Conservation Strategy

On behalf of the Trust I wish to thank the TRC for its continued support and commitment to the founding principles towards the Pukeiti garden.

Yours sincerely

Gordon Bailey

Chairman



6 April 2018  
Document: 2041279

Basil Chamberlain  
Chief Executive  
Taranaki Regional Council  
Private Bag 713  
Stratford 4352

Dear Mr Chamberlain

## 2018/2028 Long-Term Plan: Submission on the Consultation Document

This document is the Taranaki Regional Council's submission on its *2018/2028 Long-Term Plan Consultation Document*. This submission allows the Council to make amendments to the supporting documentation used to prepare the *2018/2028 Long-Term Plan*.

### Background

Pursuant to section 83 of the *Local Government Act 2002*, the Council is undertaking a special consultative procedure on its *2018/2028 Long-Term Plan*. The consideration of submissions on the *2018/2028 Long-Term Plan Consultation Document* allows the Council to make changes to the supporting documentation used to prepare the *2018/2028 Long-Term Plan*. This particular submission deals with the issues that have arisen since the *2018/2028 Long-Term Plan Consultation Document* was adopted.

### Estimates

There has been a number of staffing changes and minor estimates changes during the last three months. In particular, there has been additional clarity on the level and timing of central Government funding for the biodiversity/predator control programme. As this funding is spent as it received, it is fiscally neutral for the Council's budgets.

The estimates have been updated to reflect these changes. There is no effect on the level of general rates proposed for 2018/2019.

### Taranaki Stadium Trust

The Council is seeking legal advice on a range of matters, including its relationship with the Taranaki Stadium Trust. Some fine-tuning of *Long-Term Plan* content in respect of these matters may arise as a result of the advice. Therefore, it is recommended that the Chief Executive be delegated the authority to make the necessary editorial changes.

### **Editorial changes**

There are a few minor typos and editorial changes required to finalise the *Plan*. None of these are significant or have financial implications. A number of the changes are necessary as a result of the recommendations contained in this and the other submissions. There are also likely to be minor editorial changes resulting from the audit process. Again, it is recommended that the Chief Executive be delegated the authority to make the necessary editorial changes.

Thank you for the opportunity to comment on the *2018/2028 Long-Term Plan Consultation Document*.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'B G Chamberlain', written in a cursive style.

**B G Chamberlain**  
**Chief Executive**



2018/2028 Long Term Plan Consultation Document:  
Summary of submissions, comment and recommendations

Submitter and Summary of Submission

Comments

1 **PSGR - Physicians and Scientists for Global Responsibility**

Doc No. 2018733

PSGR is a not-for-profit, non-aligned charitable trust whose members are mainly science, medical and machinery-of-government professionals. Since the Royal Commission on Genetic Modification made recommendations "to proceed with caution", PSGR has maintained a watching brief, in particular on scientific developments in genetic engineering (also referred to as genetic modification), as well as other public interest issues involving health and environmental safety where we can offer expert opinion on lawful and authoritative public policy information.

Please consider this information and recommendations as a submission by PSGR to your planning development and consultation 2018. PSGR will speak to this submission.

**In forming responsible and effective governance**

The responsibility to ratepayers and the wider community requires informed decision-making, including consideration of new information and peer-reviewed science that may challenge perceived wisdom, or current policy assumptions. In many situations an intergenerational perspective is required.

In this submission regarding your Long Term Plans we ask Council to consider the following issues to be addressed:

- Providing drinking water free of fluoridation;
- Protection against contamination of land and waterways by genetically engineered organisms;
- Urgent reduction of public, crop and animal exposure to glyphosate-based herbicides.

Fluoridation of drinking water is a matter that by decision of Government now rests with the Ministry of Health and Medical officers of Health. It has not been a matter for regional councils to address in any case.

EPA is the statutory body for decision-making re controls for genetically engineered organisms.

The Regional Council is guided by EPA controls for glyphosate-based herbicides, as the statutory decision-making body. The Regional Air Quality Plan for Taranaki already sets out a range of measures and controls for restricting and reducing off-target public, crop, and animal exposure to herbicides.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

2018/2028 Long Term Plan Consultation Document:  
Summary of submissions, comment and recommendations

Submitter and Summary of Submission

Comments

2 Lizzy Brouwers

Doc No: 2018716

Nga mihi,  
To who this may concern, as the Enviroschool facilitator for Kindergarten Taranaki, I would like to support the council's proposal to fund a regional position for Enviroschools in Taranaki.

Support for the Enviroschools project is noted.

I have been working as a facilitator since 2012 and have been totally supported by Lauree Jones, who currently works for Toimata and facilitates to local primary schools in our region.

Lauree has a passion and natural affinity for this job. Both she and I complement each other in the delivery of the Enviroschool Kaupapa. Lauree supports me in the professional development delivery to our Cluster. So consequently we have 8 new kindergartens who have been sent their agreements this year! Working with Early childhood teachers provides an open pathway of knowledge in children's transition to school. Consequently it is crucial that Lauree's work in primary and mine in early childhood continue in grow and support the up and coming generations who are thinking and acting sustainably. If anyone was to be considered to fund a regional positional for Enviroschools, I sincerely recommend Lauree Jones for this position.

Nga mihi,

Lizzy Brouwers  
Kahikatea Kindergarten  
Enviroschool Facilitator ~ Kindergarten Taranaki.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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**Submitter and Summary of Submission**

**Comments**

3 **Mr James Tate**

Doc No. 2018611

Supports predator control programme

Thinks Pukeiti/Taranaki Crossing is a great opportunity and vision for the region.

Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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**Comments**

**4 Mr Paul Bishop**

Doc No. 2021232

Supports predator control programme

Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.

Thinks Pukeiti/Taranaki Crossing is a great idea. In future we could even make more trails on the paper roads around the coast of Taranaki. It would be great for locals and tourists.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan*.

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Comments

5. Ian Armstrong

Doc No. 2021683

In collaboration with Sport Taranaki I wish to submit to the Council's 2018-2028 Long Term Plan.

In 2007 a Regional Walkways and Cycleways Strategy was developed for Taranaki. The vision of this document was "to provide transport choice and opportunities for people to discover and enjoy Taranaki's unique environment through walking and cycling". Objective 5 of the strategy was "To promote integration, co-ordination and consultation amongst strategy, planning and implementation agencies involved in walking and cycling in Taranaki". The Tapuae Roa project goes some way to addressing the above vision as does the proposed Pukeiti to Oakura trail. Both of which I commend. However I believe the intent of the 2007 Walkways and Cycleways Strategy is currently far from being met.

In November 2017 Sport Taranaki called a meeting of the four Taranaki Councils to discuss an integrated tracks and trails strategy for Taranaki. This meeting was held on November 28<sup>th</sup> 2017. The purpose of this was to ask the four Taranaki councils to work towards a common strategy utilising existing and planned tracks and trails with the intent of linking some of them in the future.

Since November 28<sup>th</sup> Lincoln University, funded by the Walking Access Commission Aotearoa, has carried out preliminary studies of current and planned tracks and trails infrastructure to develop a comprehensive and cohesive map of the region and develop an overall rational or Kaupapa to underpin the building and future development for the whole of the Taranaki region. It's important that current plans and those that are being developed for the near future are linked to the work being done now by the walking Access Commission Aotearoa.

A public petition has also been initiated supporting the four Taranaki Councils working together to formulate the integrated strategy and to move on this in a timely manner.

Together with Sport Taranaki at the 2018-2018 Long Term Plan Public Hearings the Public Petition will be presented and spoken to.

The Council fully supports the work of Sport Taranaki and the Walking Access Commission to develop an integrated tracks and trails strategy for Taranaki. The Council has been closely involved, along with the district councils, in working jointly with Sport Taranaki to develop the Strategy and this will continue.

The Council's contribution to the Strategy will be met within existing budgets.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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<p><b>6. Mrs Lauree Jones, Taranaki Enviroschools</b></p> <p>Supports predator control programme</p> <p>Supports Pukeiti/Taranaki Crossing</p> <p>I support the deepening of relationships with tangata whenua by TRC both within &amp; outside its walls. I agree that more can be done around our waterways plus I strongly agree that supporting the Enviroschools Kaupapa in this region would be great for both TRC and Taranaki Enviroschools. It would support the potential for wider reach as well as layering the environmental, cultural &amp; social education opportunities for Taranaki schools &amp; their communities. It is also complimentary to the educational workshops TRC currently provides. The difference being that Enviroschools is a holistic long term journey for early childhood centres through to secondary.</p>	<p>Doc No. 2024016</p> <p>Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.</p> <p>Support for the Enviroschools proposal is noted.</p> <p><b>Recommendations:</b> That the Taranaki Regional Council:</p> <ol style="list-style-type: none"><li>1. <u>thanks</u> the submitter for their submission</li><li>2. <u>makes</u> no change to the 2018/2028 Long-Term Plan.</li></ol>

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<p>7. <b>Mr Malcolm Carswell</b></p> <p>Supports predator control programme</p> <p>Does not support Pukeiti/Taranaki Crossing Too much money for amount of people that would use it.</p> <p>Continuation of boulder dumping for erosion protection of cliff face on Onaero Beach.</p>	<p>Doc No. 2024003</p> <p>Support for the Biodiversity predator-free project is noted.</p> <p>The opposition to the Pukeiti/Taranaki Crossing projects is noted.</p> <p>Protection of public assets from coastal attack is a New Plymouth District Council responsibility with private assets normally being a private responsibility.</p>

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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<p><b>8. Mr Peter Hodkinson</b></p> <p>Supports predator control programme</p> <p>Supports Pukeiti/Taranaki Crossing</p> <p>I question EnviroSchools without a dedicated recycling centre in place. Currently, paying for e-waste and a lack of a recycling centre (amongst other unnamed issues) negates any benefit brought by EnviroSchools. A holistic approach including an assessment of recycling should be undertaken by the council.</p> <p>Omitted from the plan is any sort of contingency plan or due diligence regarding the reliance this region has on the two big industries of Dairy and Oil/Gas. Should a disruptive technology hit either of these industries (e.g. energy storage such as Tesla batteries), the region would take a sharp negative economic turn. I expect the council to consider and have a long term plan in place for the benefit of the people regarding this.</p>	<p>Doc No. 2025116</p> <p>Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.</p> <p>Issues around the provision of a holistic approach for recycling is a territorial authority responsibility.</p> <p>It is not the Councils' responsibility to plan for future developments with Taranaki industries. The Council has participated in the development of the <i>Taranaki Regional Development Strategy - Tapuae Roa</i>, which in part addresses some of these issues.</p>

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.



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Comments

9. Margaret Vickers

Doc No. 2024390

Hi there, you say to let you know what I think. Well here I go. My parents in-law were members of Pukeiti so I have knowledge of Rhododendrons azaleas etc. Plus my garden has also been part of the garden Festival, or as it was known back then the Rhododendron Festival. I also know how the original garden and entrance way used to look. Pukeiti is a beautiful part of Taranaki's garden heritage. BUT on my last visit I was very disappointed that we no longer have a beautiful lawn surrounded by perennial borders that in summer were a magnificent site. Where have all those beautiful perennials gone?

I love the new dining area but question the necessity for all that steel structure? An over kill in my view. There seems to be a loss of focus on garden which is a shame. I am hoping that the proposed link with cycle track does not also steel from the natural beauty of this garden. In my view it is an awful lot a rate payers money being spent on so few. Bring back the true garden that Pukeiti was, a place for the whole family to enjoy. You are losing sight that it should be a Garden of Interest not a recreation area for cyclists etc. to wiz through. This was the general feeling of those that were in my group when we last visited. I feel there needs to be far more consultation and input from the public who are providing the money for such improvements.

Pukeiti is in the process of a comprehensive upgrade through the implementation of the Pukeiti Asset Management Plan. The plan was formulated working closely with the Pukeiti Rhododendron Trust.

At the heart of the upgrade and development of Pukeiti is its world-class rhododendron collection and the Council continues to improve and expand this. The new covered areas have been designed to display the largest collection of vireya (subtropical) rhododendrons in a public garden in the world.

The new structure was designed to grow and display the plants to best affect with the right light levels and excellent air movement. The planting was completed in the spring of 2017 and will take a little time before the plants fill out and provide a stunning display. So although the steel is obvious now, in time that will change.

In the next year Council will finish all the facilities and hard landscaping in the main areas around the lawn, lodge and rainforest centre. This will be closely followed by a comprehensive programme of planting to create a world-class garden experience to build on and enhance Pukeiti's reputation as one of the great rhododendron gardens of the world.

The recreational aspect of the proposed developments is to open up the Pukeiti Rainforest through family friendly hiking and riding tracks and therefore enhance and complement the world-class garden. This proposed strategy has been reinforced by the fact that in this last season visitor numbers have increased by 120% through the improved facilities and family friendly activities, all centred on the gardens.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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Comments

10. New Zealand Farm Environment Trust

Doc No. 2025630

Thank you for the opportunity to submit on the Taranaki Regional Council Long-Term Plan 2018-28.

The New Zealand Farm Environment Trust is a charitable organisation that was established in 2000 to promote sustainable farming and growing. The Trust is funded by our primary sector partners and through the generous support of regional councils including Taranaki Regional Council.

Our flagship activity is the Ballance Farm Environment Awards. Through the awards programme, farmers and growers gain independent feedback which they use to improve the sustainability of their business. We also find that entrants feel strongly about the need to share knowledge and positive stories about farming and growing with others. In many cases, entrants have gone on to important leadership roles in which they have championed sustainable farming.

One of the strengths of the awards programme is that it is managed regionally by a group of locals passionate about sustainable farming. The Trust's role is to help provide co-ordination and to be a point of contact with national partners.

The Trust is keen to maintain and enhance its partnership with the regional council. We see a number of exciting opportunities to compliment the role of the regional council to promote sustainable farming and growing practices.

On behalf of the Trustees and the local awards committee, I would like to thank you for your ongoing support. We look forward to continuing to work in partnership with the regional council to meet community outcomes.

The Council values its relationship with the New Zealand Farm Environment Trust and its showcase event the Ballance Farm Environment Awards. We look forward to continuing to work together on the regional awards and showcasing the good work being done by farmers to future proof their farming business and protect the environment.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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**Comments**

**11. Mr Stephen Bates, Upcycle Taranaki Limited**

Doc No. 2026332

Supports predator control programme.  
This upfront cost will be "paid for" by preserving our native flora and fauna. Prevention is better than cure!

Support for the Biodiversity predator-free project is noted.

Does not support Pukeiti/Taranaki Crossing  
Money better spent elsewhere.

The opposition to the Pukeiti/Taranaki Crossing projects is noted.

My main purpose of filling in this submission was to advocate for Enviroschools. They do an amazing job and are the only national Enviroschool who need to seek their own funding outside of Regional Councils. They can be much more efficient at doing their roles and education young to live sustainably if they were less concerned about sourcing funding every year. It is also a great look for the TRC to be involved in such a great organisation.

Support for the Enviroschools proposal is noted.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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12. Wild for Taranaki

Doc No. 2029873

The Trust supports the work being proposed for predator control and agrees with the Council's implementation of the first three years of a region-wide predator control programme around Mt Taranaki, focusing on the Waiwhakaiho catchment, and trialling possum eradication.

The implementation of a region-wide predator control programme fully aligns with the Trusts Restore Taranaki Initiative. The four objectives being to:

- engage the Taranaki Community to take action.
- Restore the Sound and Movement of Our Taranaki Wildlife (through predator control)
- Restore the Cloak of Taranaki (through native planting)
- Restore the Fresh Water of Taranaki.

Wild for Taranaki has been working hard on and is currently in the final implementation stage of 'Restore Taranaki' initiative, a considerable amount of work with the support of the council has already been undertaken with the finalisation of a Revenue Generation Strategy, Communications Strategy and creation of a website.

Wild for Taranaki's members are currently undertaking a variety of biodiversity projects within the region, including regional education (Enviroschools), translocation of native birds back into the region (kokako), and intensive predator control within specific land areas (East Taranaki Environment Trust and Tiaki Te Mauri O Parininihi Trust).

Wild for Taranaki acknowledges and appreciates the key funding support that the Council has provided in support of the biodiversity projects that Wild for Taranaki and our members are undertaking.

The Trust wishes to request temporary additional funding support of \$70,000 per annum to continue to support biodiversity outcomes in the region as we launch the Restore Taranaki Initiative. The Trust is working to secure additional funding support by 2028 for the implementation of the revenue generation strategy. The additional funding is sought to employ an additional part-time person.

The Council has supported Wild for Taranaki since its establishment and are very keen to see it succeed into the future.

The Council currently provides significant financial and in kind support to Wild for Taranaki. Annually this equates to around \$300,000, noting that a portion of that funding is tagged to support existing projects.

Council is pleased that Wild for Taranaki has worked hard to develop its strategic direction and associated implementation plans. The next year to eighteen months will be critical for the Trust to deliver on its purpose and ensure a successful future for the Trust. A small amount of additional resource from the Council over this time, predominantly for additional staffing would assist in this regard.

The Council could consider providing an additional contribution of \$50,000 for one year, with the view to reviewing any ongoing future contributions. This funding would be an addition to current budgets and would be funded by general rates. Such funding would be an increase in general rates of 0.66%.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. considers an increase in funding contributions of \$50,000 for 2018/2019 in the 2018/2028 Long-Term Plan.

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**13. Greg Rzesniowiecki**

Doc Nos. 2030551 & 2030550

Greetings Mayor, Councillors and Staff,  
We write as engaged citizens in the New Zealand democracy. Previously in 2014 we wrote to you concerning the Trans Pacific Partnership (TPP) on behalf of the Motueka Renewables where we proposed the TPP Policy Solution. Arising from that a number of Councils engaged with the TPP matter and ultimately 12 Councils adopted the offered policy, many more noted and maintained a watching brief on the negotiations. Presentations were made to over 30 Councils some receiving presentations in multiple forums; workshop, committee and council.

The submitter's comments in relation to the TPP are noted. Issues relating to the TPP are addressed at a national level through the Government and Parliament. The Council does not have a specific role in these matters.

It is fair to say a few councils stated that TPP is not a council matter, however most took an active interest and thanked us for bringing it to their attention.

In the later part of 2015 LGNZ (Local Government NZ) undertook an assessment on behalf of constituents. The resultant report concluded there were some risks to local government interests and some were down the track.

We suggest that trade negotiations are of critical importance to all New Zealanders given the constitutional implications which alter the legal balance between human and property interests and rights.

The TPP has been through a tumultuous process, agreed and signed 4 February 2016, then Trumped January 2017. Since then the remaining 11 nations have negotiated a new agreement signed 8 March 2018 in Chile called Comprehensive and Progressive Agreement on the Trans Pacific Partnership (CPTPP). It is substantially the same agreement with 22 suspended provisions pending the return of the United States (US). Civil Society maintain our concern believing that the entrenchment and extension of property rights for foreign corporations will make it difficult for the NZ Government to ensure the wellbeing of all inhabitants.

All councils will now appreciate the public concern for clean rivers, quality potable water and indignation at allocations from aquifers for bottled water exporters. Whatever your council's attitude, it is acknowledged by Trade Minister Parker that CPTPP would disallow a tax on exported water as it is deemed discriminatory under the CPTPP regime.

With regard to Air NZ - Shane Jones public spat regarding regional air services - the State Owned Enterprises (SOE) Chapter 17 of CPTPP, highlights the government must ensure that Air NZ operates on

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a purely commercial basis when delivering domestic services unless it has issued a public mandate for it to do otherwise. It's great that regional Mayors are proactive on behalf of their regions and provincial cities. Parliament is displaying bipartisan support for Jones' stance. There's no way the NZ Government has anticipated every angle before locking NZ into CPTPP.

The attached paper also deals with the unfolding Facebook Cambridge Analytics election hacking scandal which demonstrates the dilemma of losing control of one's personal data - the CPTPP ECommerce Chapter guarantees that the NZ Government will be powerless to prevent misuse of data as NZ will not have any legal right to demand that data is retained in NZ.

CPTPP imposes many constraints on NZ governance, entrenches corporation rights (ISDS) and leaves NZ exposed to whatever amendments are negotiated upon the return of the US which appears likely given statements from their corporate sector.

LGNZ Conference this year is in Christchurch from 15-17 July 2018. The 2018 conference theme is; We are firmly focused on the future: Future-proofing for a prosperous and vibrant New Zealand. There will be a strong focus on leadership and addressing the big challenges and opportunities facing New Zealand and its communities. Question to LGNZ - How does TPP/CPTPP future proof NZ?

We wish you well in your deliberations. Please consider the attached evidence paper and recommendations for your 2018 Annual Plan and Long Term Planning processes.

We offer four specific recommendations (detail in the attached paper);

- Recommendation #1 (page 13 attachment). We suggest that the Council considers formally supporting the 23 principles offered by Alfred de Zayas in his paper to the UNHRC (A/HRC/37/63) in which he "highlights the urgent need to apply human rights principles systematically and uniformly to all entities and endeavours." De Zayas states "What we see is a financial system rigged in favour of powerful individuals and corporations, unequal participation in governments and international organisations, and communities suffering from a reduction of social services, imposed austerity, privatization of public utilities, the misplaced priorities of political leaders and a general absence of genuine representation," - UN Human Rights High Commission press release

Whilst the Council has no direct views on these principles, it should be noted that the Council is a creature of statute and its principles are governed by the *Local Government Act 2002*. Most of these principles apply to states and nations.

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- Recommendation #2 (page 20 attachment)  
Given that de Zayas states "Especially in matters of trade, it is imperative to give all stakeholders the opportunity to weigh in the negotiations so as to ensure transparency and accountability," we urge Council to endorse the model trade and investment treaty process offered in the [www.dontdoit.nz](http://www.dontdoit.nz) petition The petition takes the government at its word where it said to the NZ Parliament in the Speech From The Throne 9 November 2017 that it will exclude investor state dispute mechanisms (from TPP) and avoid their inclusion in all future agreements. The petition acknowledges the Labour Party 2017 Trade election manifesto where it offers "Greater engagement with civil society over trade talks" suggesting a democratic process toward a standing general mandate for New Zealand's future negotiations to guide NZ's trade negotiators.
- Recommendation #3 (page 21 attachment). We urge the council to support the Local Government (Four Well-beings) Amendment Bill which amends the Local Government Act (LGA) 2002 to reinstate references to social, economic, environmental, and cultural well-being that were removed by the National government in 2012. The "four well-beings" were a cornerstone of the LGA 2002 when it was introduced. The "four well-beings" provide the modern focus of local government on serving and being accountable to the communities they serve. It highlights the constitutional role that local governments play in community development and nation building.
- Recommendation #4 (page 23 attachment). We urge you to read and consider Kate Raworth's "Doughnut Economics" as a framework for thinking about economics in the 21st century given that the challenges we are facing this century are global in scale but local in solution and we need a different mind set from the economics of the past if we are to viably approach these challenges.  
<https://www.kateraworth.com/doughnut/>

The Council does not hold a view on these matters noting that they are dealt with at a national level by the Government and Parliament.

This is not directly a Long-Term Plan matter. The Council may consider a submission on the Bill at a later date and through separate processes.

The submitter's advocacy in relation to this framework is noted.

Attached paper:

NZ on the cusp of greatness - we make the case for action to ensure ethical governance in New Zealand – Evidence paper to NZ Regional Councils and Territorial Authorities March 2018

Many thanks for your consideration.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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14. Fish & Game New Zealand – Taranaki Region

Doc No. 2031067

Thank you for the opportunity to comment on the TRC's 2018-2028 Long-term Plan (LTP).

Ramping up biodiversity protection – towards a predator-free Taranaki  
As a foundation member of Wild for Taranaki, Fish & Game NZ (Taranaki Region) is very supportive of the TRC's preferred option to implement the first three years of a region-wide predator control programme, focussing on the Waiwhakaiho catchment, around Mt Taranaki and trialling possum eradication in an area west of the mountain. We wish the TRC and Wild for Taranaki every success in raising the external funding required to see this project proceed and we are keen to help with this project in any way that we can.

Support for the Biodiversity predator-free project and is noted.

Key native ecosystems and biodiversity plans  
Fish & Game remains very supportive of the TRC's programme of working with interested landowners, iwi, community groups and organisations such as QEII and Fish & Game to voluntarily protect and enhance the ecological values of key native ecosystems. Fish & Game has worked collaboratively with willing landowners, the TRC and QEII to successfully enhance and protect a number of wetlands in the region. In our view, the approach is working well and is resulting in some great outcomes for biodiversity.

Support for the Biodiversity Programme is noted, and the Council values working with Fish & Game on wetland protection projects.

Extending existing programmes - Freshwater quality monitoring  
The intention to commit more resources to freshwater monitoring in order to meet the requirements of the NPS-FM is supported. In particular, we support the extension of the TRC's periphyton monitoring programme 50 that it includes monthly chlorophyll-a sampling, along with concurrent nutrient sampling and hydrological monitoring.

The support is noted.  
Monitoring by the Council of periphyton 'hotspots' under worst-case flow conditions over more than 2 decades shows that routinely the region's waterways almost always meet the Ministry for the Environment's previous guidelines for periphyton abundance. The recently promulgated NPS-FM criteria for periphyton require regularly scheduled year-round monitoring of periphyton together with nutrients, over an extended period. The Council has adjusted its periphyton programme to ascertain in due course the state of the region's rivers against the new criteria. No breach has yet been ascertained due to insufficient duration as per NPS specification.

Periphyton proliferation, and the consequent adverse effects on pollution-sensitive macro-invertebrate communities, remains a significant issue in the middle and lower reaches of Taranaki streams and rivers, with summer sampling by the TRC revealing that over the years a number of sites have breached the NPS-FM's 200 mg chl-a/m<sup>2</sup> national bottom line.

Statutory managers of freshwater sports fish, game birds and their habitats  
In our experience, periphyton blooms can occur in any month of the year, all that is needed is a period of low flow recession. Therefore, a move to a monthly sampling regime is welcomed.

The Council's adjusted NPSFM-compliant periphyton programme is incurring considerable added expense. The previous programme does not meet NPS-FM specifications, and the sites identified in the submission are not suitable for the year-round all-flow benthic sampling programme imposed by the NPS-FM. The



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However, we do have a concern that a number of lower catchment sites currently monitored in the TRC's summer periphyton programme will not be carried through into the new sampling regime. These sites include the Patea River at Skinner Road; Manganui River at Bristol Road, Waiongana River at SH3A and Devon Road; Waingongoro River at Ohawe (or a similar accessible site in the lower reaches), and the Waiwhakaiho River's lower reaches (preferably the river downstream of Mangaone Stream confluence). These sites are all in regionally significant waterways and without them there is a risk that the revised monitoring programme will be seen as avoiding lower catchment sites that have previously experienced significant blooms of periphyton. Sites in the lower reaches of small ring plain catchments that originate outside Egmont National Park (e.g. Waitoteroa, Matanehunehu) are also not well represented in the new sampling regime. We appreciate that the more sites there are, the greater the cost, but in our view the inclusion of additional lower catchment and small ring plain catchment sites adds significantly to the robustness of the monitoring programme and is money well spent.

latter also requires sites that are representative of the region's waterways, rather than sites that are individually significant for some particular reason.

Extending existing programmes - Education Fish & Game supports the TRC's intention to promote long-term action on sustainability and environmental protection by funding a regional position for the Enviroschools organisation.

Support is noted.

Extending existing programmes - Working with iwi and hapu

Support is noted.

Fish & Game supports the TRC's intention to deepen its connection with Māori by (among other things) helping iwi to extend their capacity to contribute to resource consent and planning processes.

Support is noted.

Resource Management

The provision of effective fish passage and removal of unused weirs

In its submission to the TRC's 2015/2025 LTP, Fish & Game requested that the TRC provide additional resources to resolve long-standing fish passage issues at a number of high priority weirs, including the "Riverlands Eltham" weir on the Waingongoro River and the Kaupokonui Glenn Road weir. Fish & Game's submission also requested that additional resources be provided to facilitate the removal of other un-used structures impeding fish passage (e.g. such as a concrete farm access ford in Kapuni Stream; see Appendix 1) and to assess un-consented farm access culverts for fish passage. Removal or upgrade of these structures are potentially easy wins in terms of improving fishery values across the region, and re-

The programme identified by the submitter is already resourced and underway, with the first stage being a systematic and comprehensive identification and evaluation of barriers to fish passage, which will then lead to a prioritisation of interventions. One reason that these issues have been long-standing is that they are not tractable to progress.

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establishing the connectivity between the Maunga and the sea.

Our understanding in respect of un-consented farm access culverts is that TRC land management staff are currently in the process of assessing whether riparian plan holders have fish friendly culverts, or not.. In our view, adding farm access structures into the TRC's Land Management Riparian Plan Auditing Programme would be a key additional step that would encourage landholders to have all their culverts fish friendly in order to qualify for a completion certificate. Culverts that continue to restrict fish passage would then require a resource consent pursuant to Rule 64 of the Regional Freshwater Plan.

In terms of fish passage issues at major structures, including the Riverlands and Glenn Road weirs, there doesn't appear to have been much progress and so we continue to request that additional resources be provided in the TRC's LTP to ensure that these issues are addressed.

Resource management

Lake Rotomanu water quality

Lake Rotomanu is (or was) an important multi-use recreational resource used for swimming, water skiing, jet skiing, kayaking, trout fishing and model boating. The surrounding grassed area is an important dog walking "off the leash" area. The lake is included in the TRC's summer bathing water quality sampling programme.

The lake and its intake are NPDC responsibilities. The bed level degradation is a natural process. The best way to address the intake issues is to redesign the intake. At this stage the Council has no funding for work associated with the Lake Rotomanu intake.

Lake Rotomanu has suffered from poor water quality since the collapse of its weed-beds in September 2001, but water quality has worsened significantly in recent years. In the current bathing season, signs warning of potentially toxic cyanobacteria blooms (no dogs or swimming) have been in place continuously since 8<sup>th</sup> November 2017, with the lake remaining in the high risk category for contact recreation (>1.8mm<sup>3</sup>/L) right through until 19<sup>th</sup> March 2018 and peaking at a planktonic cyanobacteria bio-volume of 7.59mm<sup>3</sup>/L in early February 2018. Given the severity of the bloom this summer, it could be considered fortuitous that no dogs have died from drinking the lake water. The current water quality is therefore seriously affecting use of this recreational resource, which is highly valued by New Plymouth residents.

A major contributing factor to the bloom is the lack of water flow through the lake. An inlet structure that was re-instated by the TRC following the March 1990 flood, allows water to enter the lake from the adjacent Waiwhakaiho River. Prior to 2009, water flowed continuously into the lake and even when the river

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was at low flow the water level was at the top of the lake inlet pipe. However, following river works by the TRC in 2009 to maintain the flood channel capacity of the lower Waiwhakaiho River, the river bed level has dropped in the vicinity of the intake so that when the river is at low flow, lake water now flows back out of the inlet pipe into the river (see photos in Appendix 1). This change means that there is now no water flow into the lake for long periods, which clearly has had a major negative impact on water quality.

The NPDC did have \$175,000 allocated in its 2014/15 annual plan to reconfigure the intake, but this was stripped out and re-allocated in its 2015-2025 LTP (despite a submission to the contrary from F&G), so that currently there are no plans or funding to remedy this situation.

What Fish & Game is seeking from the TRC is for it to allocate resources to this project in its 2018-2028 LTP to form a working group with the NPDC and interested parties such as recreational users and Fish & Game in order to formulate a design and funding plan to reconfigure the Lake Rotomanu inlet structure. Fish & Game Is making a similar submission to the NPDC's 2018-2018 LTP.

Resource management

Riparian management programme audit  
Most farmers are doing a great job fencing and planting waterways to meet the TRC's 2020 target and the audit process to check existing riparian plans to ensure they capture all waterways and wetlands and are fenced and planted to national water quality expectations is very much supported.

It is proposed that this will form part of the riparian audit process.

One additional aspect for consideration in the audit process is the Impact of stormwater discharges from farm races and bridges on water quality, Farm bridges are often at a low point on the farm race and the discharge of accumulated sediment, nutrients and faecal coliforms to surface water during rainfall events can be substantial (Appendix 1). While replacing problematic bridges with more substantial and environmentally friendly structures is expensive and not always practicable, the use of stormwater cut-offs and sumps and silt traps along farm races would go a long way to reducing the amount of effluent being discharged to streams. Including stormwater discharges from farm races in the TRC's Land Management Riparian Plan Auditing Programme would seem to be a good way to address the issue and would help the TRC to achieve its regional targets for swimmable rivers under the NPS-FM.

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We do wish to be heard in relation to this submission.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan*.

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15. Mrs Pamela Cordery

Doc No. 2032149

I am in support of a crossing but ONLY for walkers, NOT for cyclists.

My first point is actually a Question: Has work already begun on this? Does the TRC have any knowledge of who is cutting tracks through the Kaitake Ranges, i.e. within the Egmont National Park boundaries? My concern is that this is becoming a fait accompli by the time submissions are being sought. Can assurance be given that this is not the case?

As to a shared track, this is fundamentally flawed. As is constantly seen on the foreshore, some cyclists and walkers are unable to share successfully. My point is that in native bush, with lots of corners and no long-range vision, coupled with mountain biking which by nature is fast, there will be accidents. Particularly as children walking in front of their adults (a common thing as they love to be the explorer and 'first' in their group, surely the point of providing such a track) will be the first to encounter cyclists coming from the opposite direction. Therefore, "share with care" is unreasonable and doomed. This is exacerbated by the fact that many users will be overseas tourists, who instinctively pull right rather than left, which obviously in limited space will be problematic. If opposing parties are both walking, not a problem, but with the speed of cyclists, dangerous.

The easy accessibility from Oakura is a fabulous opportunity for all abilities to get into the National Park and be immersed in real native bush. This does however compound the clash between cyclists and walkers, as not all users will be of an experienced level. I do see the idea of this track as a positive in terms of offering an alternative to Around the mountain or Summit climbs. I regularly tramp myself and often encounter tourists who are ill-equipped and/or inexperienced for attempting these routes. So to promote an alternative which still has appeal is a good idea. There are issues however:

1) The Pouakai Crossing which is widely promoted worldwide, but not with enough accurate or up to date info for many of the tourists I meet. Promotion of a new track should not be happening before preparations are completed. The tracks become quickly eroded and broken down which is damaging the precious environment and endangering users. It is important that this does not happen with a "Taranaki Crossing". An example of this is currently, a slip (near Boomerang Slip) on the Round the Mountain Track, which is part of the Pouakai

The *Long-Term Plan* proposes that the Taranaki Regional Council is a funder for the development of the Kaitake Trail. The project will be led by the New Plymouth Council as it is proposed to be on their paper road. No work has started on this track. The design of the track is yet to be done but it is proposed to incorporate both walking and mountain biking based on similar successful multi use tracks around the country.

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Crossing is dangerous and has closed this track, yet it is still promoted. I know that some users are ignoring the warning of this closure and its detour and crossing the slip anyway. It would be very distressing if the proposed track did not avoid any similar situations by ensuring the route does not include high risk erosion/damage terrain. Careful consideration of planning would be far preferable to damage control in hindsight. TRC must ensure due diligence now. This is particularly since not only official websites share info, but also travel blogs etc. and commercial businesses with vested interests will be wanting to promote the track, so it must be of a resilient nature and sufficient standard first. The disparity between internet promotion and reality on the ground is illustrated by an anecdotal story of someone who arrived at Pouakai Hut at dusk on a cold evening with weather closing in. He encountered a young Japanese tourist who had enough information to hear of the Pouakai Crossing, and had come up Mangorei Track to the hut. Whereupon she expected to be able to buy her dinner and have a warm bed. She had no food or warm bedding and was unable to light the fire, all potentially dangerous. Apparently it was a language barrier that had caused this situation. A similar situation occurred this summer when some locals met two people with no overnight gear or decent wet weather gear who thought they were walking around the mountain in one day. Fortunately the locals were able to explain this was not going to happen and convinced them to turn around before they ran out of daylight. Again weather was closing in quickly, a local phenomenon which visitors don't expect and are caught out by the speed of. So, with this proposal, these realities need to be considered. Hut and shelter placements need to allow not only for experienced, long range users.

Another clash between bikers and walkers is around hut placement. A cyclist can get a lot further than a walker, so huts are not necessarily in the right place for both.

2) Liaison between DOC and TRC needs to be efficient and effective. Again, as with my first point I question this at the moment. Therefore, car-parking, toilets, and track building and maintenance need to be well planned ahead of time and well maintained. Damage to the native bush needs to be kept to a minimum, which is not necessarily the case with current tracks. The car parking situation at North Egmont needs to be addressed before a Taranaki Crossing can be added to the problem. Maintenance of tracks already in the National Park is not being carried out now, for example part of the Curtis Falls track is very

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overgrown and has been for years. Whilst this may be a DOC rather than TRC issue, I do not agree with cutting a whole new route when those already in use are not maintained.

3) Mountain bikers have themselves admitted that if they are allowed access to native forests they will want to 'go hard'. This is detrimental to the bush itself, and to other users. This surely is diametrically opposed to the values of the TRC. Broken bike parts will contribute to the litter and contamination left behind.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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16. Sport Taranaki

Doc No. 2031479

Support for Predator-free Taranaki:  
Yes this is vital for the health and well-being of the province and our reputation nationally and internationally as a region that maintains a high standard of work in the environment. If we are to maintain the regions standing in New Zealand the predator control program is vital to this province.

Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.

Support for Pukeiti/Taranaki Crossing:  
Tracks and Trails  
Sport Taranaki supports the work of the Taranaki Regional Council (TRC) in relation to the development of the Kaitake trail and the outstanding development of Pukeiti. The work to date already provides an outstanding asset to the province of Taranaki. We believe this will create national and international interest and acclaim.

We note the current work of the Walking Access Commission Aotearoa along with Sport Taranaki to develop a comprehensive and cohesive mapping of the whole of Taranaki and the plan to develop an overview of Tracks, Trails and Cycle-ways that combines the work of the TRC and the three Local Authorities. This provides a regional focus towards this type of outdoors development that acknowledges Mouna Taranaki is the heart of the province and everything flows from it. We encourage the TRC to continue to support the collective approach and work closely with these interested parties.

The Council will continue to work as part of this project.

We are excited by the plans for the Kaitake Trail and the approach taken by TRC in building the cycle way and walkway following the paper road plan, this again showing the innovation and vision of TRC. We also encourage the development of facilities that would provide overnight accommodation on the trails top allow an enhanced experience on the mountain range.

The Long-Term Plan proposes that the Taranaki Regional Council is a funder for the development of the Kaitake Trail. The project will be led by the New Plymouth Council as it is proposed to be on their paper road. Facilities development will be an issue for the NPDC to address.

Sport Taranaki is committed to improving the health and wellbeing of the of the Taranaki community through healthy and active lifestyles. The work that is underway through the TRC is seen as a great opportunity to encourage the Taranaki community to personally engage with the Mouna and to make the connection with its beauty and its majestic power.

Working with Iwi:  
Sport Taranaki is supportive of the actions of the Taranaki Regional Council in their commitment to working with the Iwi of Taranaki.

Support is noted.

For too many years nga Iwi o Taranaki had been on the side lines of the fields in which the TRC have



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worked. The progress in including Māori into supporting the many aspects of the work of the regional council is to be admired. The TRC have taken a lead role nationally in working collaboratively with Taranaki Māori and gaining their respect in doing so. Operationally Māori have much to offer with the added value of historical knowledge and stories that can be added into the work of the TRC will be beneficial.

We are certain that this relationship will be a positive and valuable one for the future.

Sport Taranaki would support the idea of Regional Enviroschools we would like to see the development of trained and knowledgeable people working to educate and engage young local people to have a closer meaningful connection to Mounga Taranaki and its environment and special ecosystems .It will assure the mounga is cared for and protected for the years to come. It is our hope that we have Taranaki people walking, tramping, climbing and riding on our mounga.

Additional Comments:

I am writing on behalf of Sport Taranaki as CEO in regard to the possible rebuild of the Eastern stand and redevelopment of the stadium facilities. The pressure is on the Taranaki region to make sure that Yarrow Stadium gets through the east stand earthquake prone issue in the best way possible. This can be seen as an opportunity to improve on what was already a very good operational stadium.

Yarrows Stadium is seen as a major regional sporting asset recognised throughout New Zealand. It has hosted a large number of international and national events over the years. It has been an asset that we in the province of Taranaki have been proud to see and to use.

Yarrows Stadium has provided the opportunity to add value to the region with the influx of visitors to the province who take time to stay over and take the time to get to know more about the region and see its key places of interest.

The stadium has provided a home for the Taranaki Rugby Football Union executive management, coaches and team management, also KJD Catering. The supporters lounge has hosted events, luncheons, dinners and activities for the general public.

This is a major issue in the sporting scene, something that can't be ignored and must be dealt with the help of the whole Taranaki region and not left on the shoulders of one group.

Support is noted.

Comments in relation Yarrow Stadium are noted. There will be a separate exercise to address the fix for the East Stand of Yarrow Stadium. Whilst the submitter's comments are noted, funding arrangements for the Yarrow Stadium solution will be addressed as part of that exercise.

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The funding for the strengthening work and possible demolition and rebuild is obviously going to be a major issue for everyone involved but the pressure is greatest on the Taranaki Regional Council.

The property owner is the Taranaki Stadium Trust (the Trust). The purpose of the Trust is to promote the effective and efficient maintenance, development, management, operation and promotion of Yarrow Stadium as a community asset used for recreation, sporting and cultural activities for the benefit of the people of Taranaki, working in particular with Taranaki Regional Council (TRC) and New Plymouth District Council (NPDC).

TRC and NPDC have entered into dual funding partnerships for the operations and long term maintenance and development of Yarrow Stadium. NPDC manages, generates the revenue and funds the operations of Yarrow Stadium and TRC funds the long-term maintenance and development of the stadium.

To assist them we propose the TRC should look towards increasing the regional levy/rate currently in place to help with recovery and rebuild/strengthening.

Financially, the impact of this proposal for ratepayers is relatively minor. Note from the TRC proposed LTP: The Council is proposing an increase of 3.5 percent in its general rates take for 2018/2019. In the last three years, the average general rates increase has been 0.97%. Over the life of the 2018/2028 Long-Term Plan the general rates increase averages out at 2.8%. We don't believe it appropriate that NPDC (North Taranaki only) be asked to contribute additional funds via its own rates as Yarrow's Stadium is a regional asset, it has its existing regional levy, and it should use the levy to raise funds from the region as a whole.

The potential to spread the cost of the repairs and rebuild over the long-term life of the facilities would be shared in an inter-generational way and help ease the pressure on the ratepayers.

Another point to consider is once the fate of the building is known, that the region consider the Ministry of Business Industry and Employment Provincial Growth Fund (\$1 billion every year for three years) to help with the fix. From what we know, regions around the country have an 18 months window to develop and put forward projects that will benefit their regions for the longer term and create actual jobs.

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The Yarrows Stadium rebuild has the potential to provide employment within the region over that time and other positive opportunities to the province. It will have its benefits within the cost of the rebuild. While the actual cost is not yet confirmed, construction of the east stand which includes a multi-sport facilities offer as proposed in the Strategic Plan will do this for Taranaki.

Sport Taranaki encourages the TRC to formally apply to the MBIE, Provincial Growth Fund for this funding stream it is a worthwhile exercise. Sport Taranaki would be happy to support any such application in this matter.to support the Taranaki Regional Council.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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**Comments**

**17. Mrs Pauline Sutton**

Doc No. 2032224

Support towards predator-free Taranaki.

Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.

Support for Pukeiti/Taranaki Crossing.

Agree with all three proposals.

Support noted.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan*.

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**Comments**

**18. Mr Tama Blackburn**

Doc No. 2032229

Support towards predator-free Taranaki.  
More involvement by iwi and hapu for trapping.

Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.

Support for Pukeiti/Taranaki Crossing.  
Definitely.

Can we introduce walk and bike tracks further up the Waitara River and plant more flax/harakeke and start a fibre production of this great resource? If you call me I can explain more.

The provision of walking and cycling tracks is generally a territorial authority role rather than a regional council role (NPDC in this case). Having noted that, this particular suggestion might be considered by the groups that are likely to be established following the enactment of the Waitara Lands Bill.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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<p><b>19. Koromiko Kindergarten</b></p> <p>Support towards predator-free Taranaki.</p> <p>Support for Pukeiti/Taranaki Crossing.</p> <p>Our Kindergarten has been involved in education for sustainability for over a decade and a part of the EnviroSchools programme for three years. Many other of the kindergartens in our Association have joined also. Being part of the programme gives us a structure for introducing sustainable practices and guidelines for teaching the children about caring for all living things and the environment. All of the Centres involved in EnviroSchools are able to support and encourage one another and exchange ideas. Because the programme is wider than just our Association (schools and other early childhood education centres) it gives valuable information about what a range of other educational centre are doing. Having a broader base of sponsor organisations, with the Taranaki Regional Council joining up, and the creation of a further EnviroSchools regional position can only be beneficial for all.</p> <p>We strongly recommend that you go ahead with this proposal.</p>	<p>Doc No. 2032679</p> <p>Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.</p> <p>Support for the EnviroSchools proposal is noted.</p>

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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20. **Jenny Goddard, Taranaki's Historic Cathedral Project**

Doc No. 2032950

Support towards predator-free Taranaki.

Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.

Support for Pukeiti/Taranaki Crossing. Full support the exciting development linking Pukeiti to the coast.

The Governance Board of The Cathedral Project support the involvement of Taranaki Regional Council in The Regional Gardens, Puke Ariki and Yarrow Stadium. We congratulate you on the development work at Pukeiti and endorse the plans for links with the Pouakai Crossing Track .The benefits to the region are obvious and commendable.

As a key stakeholder in the cultural well-being and prosperity of the region we feel it is timely to update Taranaki Regional Council on The Cathedral Project.

Comments in relation to the Taranaki Cathedral are noted.

New Zealand's oldest stone church is here in Taranaki. Currently closed pending earthquake strengthening, the Taranaki Cathedral and its historic church yard are a veritable treasure trove of stories of our region and our people. The formal objectives of this project are:

- to upgrade, re energise and restore Taranaki Cathedral, safeguarding a Category 1 Heritage building and its history for generations to come
- to showcase the story the buildings and site tell of the relationship between Māori and Pakeha that happened here; a story of pride and shame told in a way that will resonate with all New Zealanders and ultimately contribute to enhanced bi-cultural relationships in the future.
- to create a nationally significant tourist drawcard assisting the region to meet Visitor Sector growth targets identified in the Regional Growth Strategy, Tapuae Roa.

This is an ambitious five year project that starts with the remediation and upgrade of the Cathedral to make it a more flexible place for worship, arts, music, drama and other events. Additionally a world class welcoming and function space will be built which will tell the cathedral's story and honour the memory of former governor-general and first Māori archbishop, Sir Paul Reeves. The enhancement of the historic site also incorporates on site car parking and the adjacent wooden vicarage, built in 1899.

Seen by Kelvin Day at Puke Ariki as a complementary experience to the museum, the aim is for the building and graveyard to be the centre piece of professionally curated displays that showcase the story of European settlement in Taranaki and the relationship between Māori and Pakeha over 175

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years. Through a truthful telling of a turbulent and colourful history that saw the Church acting as a garrison, the project will make a unique contribution nationally to enhanced bi-cultural understanding and relationships in the future.

As well as being a place of worship and community events, once completed, Taranaki Cathedral is expected to help add to Taranaki's reputation as a popular tourist destination. It will provide an educational and interpretative experience through the remediated and upgraded Cathedral, displays, audio visual guides and multi-media resources. It is estimated that annually it will draw more than 64,000 domestic visitors, more than 10,500 international visitors and contribute about \$7.3 million to the regional economy.

We are keen to keep Taranaki Regional Council updated over the next three years as the Cathedral Project comes to reality. We see synergy in our goals for the prosperity of the region and preservation of cultural heritage and would welcome any opportunity for further discussion.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan*.



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21. Ngāti Mutunga

Doc No. 2032951

Toward Predator-Free Taranaki

Te Runanga o Ngāti Mutunga would like to congratulate the Taranaki Regional Council on the work it has done towards eradicating pests in Taranaki. The Runanga has two Key Native Ecosystem areas managed with the Taranaki Regional Council and have received excellent support, advice and practical help in working towards eradicating pests from these areas.

However, while we support any work to eradicate pests in the whole of Taranaki, we would like the Taranaki Regional Council to make a commitment to match the funding that they are proposing to spend on pest control work on the Taranaki Ring Plain (Egmont Ecological Region) with work to be carried out on the Eastern Hill Country (North Taranaki and Matemateonga Ecological Regions).

While we understand the need to build on and support the work being carried out on the Mouna we feel that the best biodiversity gains in Taranaki will be made from pest control in the Eastern Hill Country. For example in working to connect the existing pest control networks in north and east Taranaki - namely Tiaki to Mauri o Parininihi Trust, East Taranaki Environmental Trust and Lake Rotokare Scenic Reserve.

We would like to work with the Taranaki Regional Council on any pest control work to be carried out in the Ngāti Mutunga rohe and we have people available who are willing to help with this work on the ground.

OTHER PROPOSED CHANGES

Further Develop Relationships with Māori  
We would fully support any efforts that the Taranaki Regional Council make to improve and develop better relationships with the Tangata Whenua and their role as traditional Kaitiaki of the land.

Tangata whenua hold an important store of traditional knowledge about our awa, Mouna, moana and ngahere that would help the Taranaki Regional Council develop a more holistic view of environmental management.

Te Runanga o Ngāti Mutunga look forward to engaging with the Taranaki Regional Council using a 'Mana Whakahono a Rohe' agreement in the near future.

Commit More Resources to Freshwater Monitoring

Note support for towards predator free Taranaki and wider Council biodiversity programme. The Council is committed through its existing programmes to continuing to work with iwi, community and landowners in the eastern hill country to protect biodiversity and promote sustainable land use. Landscape scale predator control is proposed to start around the Mouna initially and if predator control is successful at this scale be rolled out across the region in the future.

Further development of relationships supported. The LTP will be amended to include provisions for this e.g. recognising Mana Whakahono a Rohe (MWAR).

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We would like the Council to increase the monitoring stations in north Taranaki, at present there is only one MCI SEM sampling or physiochemical SEM sampling sites within Ngāti Mutunga and very few, if any, in the northern and eastern areas of Taranaki that we can use to help us make informed decisions about freshwater management.

The Council's SEM network has been audited and reviewed on a number of occasions and found to be fit for purpose. Monitoring is to be representative of Freshwater Management Units. A further SEM site was added in northern Taranaki for this purpose two years ago.

We would like the Council to make adequate resources available to Iwi so we are able to carry out the necessary cultural health monitoring within the rohe of Ngāti Mutunga ourselves. We realize that the Taranaki Regional Council needs this information for its State of the Environment reporting to central government.

Mātauranga Māori monitoring project with iwi is the place to address this matter.

We would like to acknowledge the support that the Taranaki Regional Council has given to Ngāti Mutunga through the SHMAK training and upskilling we have received from Taranaki Regional Council over the last 18 months.

Positive feedback acknowledged.

General Comments

We would like to see the council develop a strategy for dealing with erosion in the Uruti Valley - due to the negative impact this is having on the Mimitangiatua River - an important Awa Tupuna for Ngāti Mutunga.

Council has a land management programme in place for all the eastern hill country, including the Mimi catchment. We can update the iwi about the nature of the programme and its implementation recognising the importance of the catchment to Ngāti Mutunga.

This could include implementing the level of riparian planting that we have seen the council require on the Ring Plain and also promoting the retirement of land that is not suitable for farming as the Council has done in the Waitotara catchment

Thank you for considering our submission.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes changes to the 2018/2028 Long-Term Plan as noted above.

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<p><b>22. Taranaki Civil Defence Emergency Management</b></p>	<p>Doc No. 2031885</p>
<p>EXECUTIVE SUMMARY AND KEY RECOMMENDATIONS</p>	
<p>Taranaki Emergency Management Office (TEMO) supports the Taranaki Regional Council (TRC) 2018/2028 Long-Term Plan, and the Hazard Management group of activities that enhances the safety and wellbeing of the public and protects property from hazards and minimises damage.</p>	<p>The support is noted.</p>
<p>TEMO acknowledges the enhancements to the civil defence emergency management (CDEM) contained in the plan, for the system delivering efficient and effective CDEM activity that is acceptable to the public, and increasing the emergency readiness and response capacity and capability in the region.</p>	
<p>TEMO, as the office responsible for implementing the service level changes, works alongside with all four Councils within the Taranaki region to deliver effective and efficient CDEM. TEMO's role is to develop LTP budgets and work plans to deliver expected levels of service, and to meet legislated and regulatory requirements.</p>	
<p>Significant change is occurring within the CDEM sector, both at a national level and within the Taranaki region with implementation of a new CDEM service model following the review of structural and functional delivery of responsibilities. The model is to be implemented by 1 July 2018.</p>	
<p>Given the ongoing changes to the regional model, additional budget from 1 July 2018 is requested, to enable the appointment of statutory roles of Group Recovery Manager and Group Welfare Manager (part-time at \$26,000 per annum of the LTP for both), and three-year fixed-term part-time analyst to enhance development and review of hazard-specific response plans (\$40,000 years 1-3 of the LTP).</p>	<p>The budget for CDEM in Taranaki was comprehensively reviewed and determined by the CDEM Group (the joint committee) in December 2017. These additional budget items were not presented to the Group at the time, but were brought up by TEMO staff at the following meeting of the Group (March 2018). The Group resolved that these additional budgetary items should be referred to each of the four member councils for consideration. The Group did not offer a direction to the councils as to how they could decide the requests for additional funding.</p>
<p>Additional budget will be apportioned across the CDEM Group members as per the agreed funding split, with TRC's contribution (at 34%) being as follows: An additional \$8,840 per year for the statutory roles An additional \$13,600 for year 1 to 3 for the analyst role.</p>	<p>The position of Group Welfare Manager had been held by a TEMO staff member, but following her resignation in December the position became vacant. The position of Group Recovery Manager had been held by a district council officer and the position of Alternate Recovery Manager by a TEMO staff member, but these arrangements had become untenable with significant new statutory recovery responsibilities coming into force last year following an amendment to the CDEM</p>
<p>ADDITIONAL BUDGET REQUEST FOR THE TARANAKI EMERGENCY MANAGEMENT OFFICE TEMO is the office directly responsible for implementing the decisions of the Taranaki CDEM</p>	

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<p>Group Joint Committee, which is the decision-making committee established under the Civil Defence Emergency Management Act (2002). To give effect to the Group's responsibilities under section 17 of the Act, TEMO has been established as the Group Office.</p>	<p>Act. The TEMO officer being recently appointed Group Controller, the recovery responsibility was relinquished.</p>
<p>TEMO have been directly involved in the development of Long-Term Plan (LTP) budgets to ensure that operational and capital budgets are sufficient to deliver on the CDEM Group Joint Committee expectations. This has seen an increase in Group Office budget and staffing.</p>	<p>TEMO officers have prepared an inventory of response planning documents, including current plans consider fit for purpose, plans needing updating, and plans considered necessary but not previously prepared. TEMO already has a hazards analyst. The request would provide for the acceleration of the plan development process over that which could be achieved through existing resources.</p>
<p>Implementation of the new CDEM model for structural and functional delivery of responsibilities has been ongoing since early 2017. The broad parameters of change have been established.</p>	<p>Officers note that risk management in CDEM is a matter of balancing the desire to have the risk of consequences brought as low as practicable, and therefore making investment in preparation, dedicated staffing for particular roles, and risk reduction, against the costs of resourcing, timeliness and prioritisation, and acceptable residual risk. The Council may note that should the additional hazards analyst position not be funded, this does not mean that the region is left unprepared for the particular hazards in question, as generic preparatory planning and experience and training, together with activities by various agencies towards risk reduction and hazard preparedness, are already applicable. For example, TEMO propose an earthquake plan, a number of infrastructure failure plans, animal pandemic/biosecurity incursion plans, a drought plan, and a mass evacuation plan.</p>
<p>Given the breadth of change, work on defining the CDEM model is ongoing, with finer details continuing to be established. As such new appointments to key Coordinated Incident Management System (CIMS) positions are required as part of the review of structural and functional delivery of responsibilities for CDEM within Taranaki.</p>	<p>The Council could decide-</p> <ul style="list-style-type: none"> <li>(a) to approve both items as described in para 6 of the submission; or</li> <li>(b) to agree to the statutory roles being funded as requested , but defer funding for or decline the request for the analyst role; or</li> <li>(c) decline both items in para 6 of the submission</li> </ul>
<p>Statutory appointments by the Taranaki CDEM Group Joint Committee are required for Group Recovery Manager and Group Welfare Manager. Appointments are made by the CDEM Group Joint Committee in accordance with sections 26(2) and 29(2) of the Civil Defence Emergency Management Act 2002, and 62(6) of the National Civil Defence Emergency Management Plan Order.</p>	<p>The Council could consider providing the additional contribution of \$22,440. This funding would be an addition to current budgets and would be funded by general rates. Such funding would be an increase in general rates of 0.29%.</p>
<p>Vacancies of Group Recovery Manager and Group Welfare Manager must be appointed in a timely manner to ensure full capability should a response be required. However, a recent decision has been made that these appointments will not be made from staff within the District Councils, due to the requirement to fully staff Emergency Operations Centres. Additional budget for the Group Office is therefore required for these appointments.</p>	
<p>The positions of Group Recovery Manager and Group Welfare Manager require senior leadership skills and significant responsibilities across all phases of emergency management. Both of these roles are required to operate and prepare these activities prior to emergency, establishing the practices and systems to meet the demands of these statutory roles. Given the level of significance these roles are not appropriate to be delivered by volunteers or as part of an existing role.</p>	

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Changes to the CDEM operational model also requires changes to all hazard contingency plans (15). The approved five-year policy development schedule (2018/2023), outlines a further 16 plans and standard operating procedures to be developed under the CDEM Groups requirement to deliver comprehensive emergency management.

The policy development schedule gives effect to the Comprehensive emergency management approach required in New Zealand. It is the integrated approach to civil defence emergency management, characterised by the four areas of activity, known as the '4Rs'. The approach was formally introduced to New Zealand legislation with the 2002 Act.

The success of any emergency during response and recovery is characterised by the quality of planning before an event. Plans give effect to the priority hazards identified within the statutorily required CDEM Group Plan for Taranaki. Planning enables roles and responsibilities to be identified, and clear contingency planning defined, ensuring that response and recovery decision-making is effective.

The Taranaki CDEM Group office currently employs one full time equivalent analyst. This role is to coordinate and write policies and plans, along with risk reduction and geo-spatial information system responsibilities. The planning resource is augmented with two full time equivalent Emergency Management Advisers who write Standard Operating Procedures (SOPs).

Notwithstanding this, there is a significant workload ahead to complete and maintain a comprehensive set of plans, policies and SOPs, and increasing staffing levels at Group Office for planning would be the single largest factor to deliver the approved policy development schedule.

The recent CDEM Group decisions, on Group appointments not made from District Council staff and development and approval of the policy development schedule (2018/2023), has occurred after development and submission of the Long-Term budget for TEMO. This has meant that the additional funding required will not be in place, unless an amendment is made by each of the Taranaki Councils LTPs.

Working through the CDEM regional committees of the Coordinating Executive Group (CEG) and the Taranaki CDEM Group Joint Committee, TEMO has been referred to each respective CDEM Group member for this additional budget approval.

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**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan* or amends the *2018/2028 Long-Term Plan* to include all or part of the funding request.

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23. Tourism Industry Aotearoa

Doc No. 2033475

TIA is pleased to see the recognition of the value of tourism in the LTP and the proposed significant investment by the Council to further the Taranaki Crossing project.

Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.

We are supportive of Council's preferred option of undertaking a range of new developments at and linked to Pukeiti, positioning it as a recreation hub for a range of activities, including funding the creation of a new track linking Pukeiti to the coast - a key component of the Mountain to Surf Taranaki Crossing.

We are also supportive of the Council's aim to facilitate the continued development and maintenance of Yarrow Stadium and ensure that Tupare, Hollard Gardens and Pukeiti are maintained as regionally significant recreational and heritage amenities.

Support for recreation, culture and heritage activities is noted.

As noted, New Zealand's environment is our unique selling point and our natural environmental assets are under threat, including many of our native species.

We applaud the Council's vision of a Regional predator-free status and as such, supportive for the Council to implement the first three years of a region-wide predator control programme and trialling possum eradication.

It is pleasing how the Council continues to get very good results from its comprehensive freshwater monitoring programmes and to see Taranaki's freshwater quality is as good as or better than many other regions.

We are supportive of the Council's proposal to commit more resources to freshwater monitoring.

Support noted.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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<b>24. Te Kaahui o Rauru</b>	Doc No. 2033541
Supportive of progress towards predator-free status and good to see Mounga Taranaki prioritised.	Support for various existing programmes and new projects noted and need to appropriately consult with iwi acknowledged.
Request support for pest control in the South Taranaki region, particularly Waitootara.	
Supportive of Pukeiti/Taranaki Crossing, subject to the full consultation with and support of relevant iwi.	
Support the expansion of relationship with Maaori and translation into operational action to enhance kaitiakitanga, including capacity to engage effectively. Support more resources to freshwater monitoring, with a request to expand the sites in South Taranaki to provide a better balance of site representation, particularly Waitootara and Whenuakura.	
Support broadening education outreach with Enviroschools, with a request to help facilitate iwi-led environmental education.	
Additional comments Support Fish & Game submission highlighting the need for improvements to fish passage and culverts and improvements to farm bridges as a potential effluent source.	The programme identified by the submitter is already resourced and underway, with the first stage being a systematic and comprehensive identification and evaluation of barriers to fish passage, which will then lead to a prioritisation of interventions. One reason that these issues have been long-standing is that they are not tractable to progress.
Support the development of riparian regulations to achieve final goals with fencing and planting on farms, including looking at riparian requirements on smaller width and depth water bodies.	Support for the riparian programme noted.
Seek the prioritisation of the Freshwater Plan review and development, and encourage use of a similar early engagement model to that used with the recent Coastal Plan.	Freshwater plan consultation initiated several years ago and is basically following the approach used in the Coastal Plan, with an emphasis on recognising iwi values in resource management and identifying and mapping sites of significance to iwi for use in the consent process.
Seek additional resourcing to support improvements in swimmability standards in waterways, particularly the Patea, Waitootara and Whenuakura rivers.	Have a programme in place to deliver swimmability standards that is sufficient.
Note limited discussion of climate change and the role of TRC in adaptation and mitigation of the impacts.	Climate change implications considered in regional plans.
Note the need to prioritise drinking water quality.	This is a territorial authority role rather than a regional council role.
Note concerns held by the iwi regarding seismic testing and mining exploration in offshore areas, and a request for a precautionary approach.	Raise these in a Regional Coastal Plan submission.



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Highlight that this submission is supported by the iwi's Puutaiao Management Plan.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan*.

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<p><b>25. Mr Nigel Carter</b></p> <p>Does not support predator control programme. Not with 1080 or similar poisons.</p> <p>Supports Pukeiti/Taranaki Crossing.</p> <p>I think it is time the TRC led efforts to ban the burning or farm dumping of farm plastics waste including bale wrap, instead of turning a blind eye to it, and also to investigate recycling of farm plastic waste</p>	<p>Doc No. 2033744</p> <p>Council will not be using 1080 poison for predator control on farmland.</p> <p>Support for the Taranaki Crossing is noted.</p> <p>The Taranaki Regional Council advises farmers that it is good practice to recycle hay and silage wraps and other plastics, and actively supports and promotes the opportunities to do so. Through the <i>Regional Air Quality Plan</i>, which reflects community views as expressed at the time of development, hay and silage wraps can be burned only under strict conditions. The scientific evidence sighted by the Council shows that there are some types of plastic, but certainly not all, that can be burned cleanly on a roaring fire (e.g., an untreated wood fire) without adverse environmental impacts within rural areas. Silage/bale wrap is one such plastic that is acceptable.</p> <p>The appropriate channel for consideration of this matter is for the submitter to seek a plan change to the <i>Regional Air Quality Plan</i>.</p> <p><b>Recommendations:</b> That the Taranaki Regional Council:</p> <ol style="list-style-type: none"><li>1. <u>thanks</u> the submitter for their submission</li><li>2. <u>makes</u> no change to the <i>2018/2028 Long-Term Plan</i>.</li></ol>

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**Comments**

**26. Mr Nigel Williamson**

Doc No. 2033743

Support for Pukeiti/Taranaki Crossing.

Support for the Pukeiti/Taranaki Crossing projects is noted.

Funding for improving cycling and walking infrastructure appears to be \$0, which goes against what the Taranaki Regional Council put forward in the 2007 Walking and Cycling Strategy.

The provision of funding for cycling and walking infrastructure is generally a role for territorial authorities rather than regional councils.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan*.

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**Comments**

**27. Mr Andrew Hooks**

Doc No. 2033739

Support towards predator-free Taranaki.

Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.

Support for Pukeiti/Taranaki Crossing.

A track linking the mountain to the sea is a really exciting idea. With the mountain so close to coast it would be really special to have that connection between Taranaki, Pouakai, Kaitake and all the way to the sea. Long term I could even imagine a nature corridor to provide birds safe access from mountain to sea.

River water quality is of high importance to me and my family. Some examples: (1) When we camped at Kaupokonui the water quality appeared to be very poor. (2) After swimming in the Waiwhakaiho we walked further upstream and found cows wading in the river just around the next bend. All these 'do not swim', 'do not collect shellfish' signs need to go.

The signage referred to by the submitter is erected by the district councils as agreed with the Medical Officer of Health. They usually reflect water quality as measured by the Council's monitoring programme. The Council is pursuing policies through the review of the *Fresh Water Plan* that will lift water quality in the region. It should be noted that the worst pollution has been found to be caused by bird life

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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28. New Plymouth Mountain Bikers Club

Doc No. 2033832

Support towards predator-free Taranaki.

Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.

Support for Pukeiti/Taranaki Crossing.

The New Plymouth Mountain Bikers Club (725 members 2017) would support any construction of sustainably designed trails that are open to mountain bikes within and around Pukeiti. With our high family membership, we see the construction of trails like these not only as a huge benefit to tourism with local, national and international visitors. But the perfect opportunity for anyone to explore, learn and enjoy this unique and diverse area through stories of the past.

The development of any new mountain bike tracks within the National Park is the responsibility of the Department of Conservation.

It is great to see that the council is adopting the ideas of other proposed large scale tourist projects in its plans and in the construction of these trails.

Other proposed changes

Opening up national parks to mountain biking with sustainably designed trails does more than good than harm to the environment. We have seen that over 95% of mountain bikers would prefer to ride through these areas to explore and enjoy. At least half of these are families groups that are simply riding for fun and fitness. There is great opportunity for school groups to share as they learn about this environment. With greater access in these areas, then less resources would be needed for freshwater monitoring. But above all, access into these areas, with the assistance and guidance of local Iwi would further develop the relationship with Māori, through their own stories of the area.

Recommendations:

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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<p><b>29. Mr Adrian Lobb</b></p> <p>Does not support Pukeiti/Taranaki Crossing.</p> <p>My submission is related to the planned Kaitake Trail.</p> <p>I am in favour of developing some significant trails that allow Taranaki to participate in the economic benefits accruing across the country from the New Zealand Cycle Trail Nga Haerenga.</p> <p>The proposed Kaitake Trail appears to be short on alternatives and comparative benefits relative to other potential trails. The benefits appear to centre on the investment already made in Pukeiti and the NPDC. I don't see from the documentation how it delivers more benefit to the wider Taranaki region than other some other options might present.</p> <p>The consultation document mentions Tapuae Roa, but it seems to emotionally commit a project between NPDC and TRC before the Tapuae Roa action plan is delivered. Hopefully this was just a timing thing, and not the two large organisations gazumping the Taranaki Economic Development vehicle. Coincidentally submissions close the same day as the Tapuae Roa action plan is to be delivered.</p> <p>From the Regional Council's plan I would prefer to see a full breakdown of how the option of a New Plymouth focused trail compares to a Taranaki wide view of a trail around the mountain, and other possible options.</p> <p>I am aware of significant work that has gone into a trail around the mountain that, if built, would put Taranaki up there among the best trails of Nga Haerenga. The economic benefits of such a trail would be embraced by the towns that surround the mountain. Spreading benefit throughout the region and enhancing the time spent in the region by visitors. Consider a trail that offered in no particular order:</p> <ul style="list-style-type: none"> <li>• Geographic views from the boundary of the national park.</li> <li>• Ring plain, hill country and volcanic features.</li> <li>• Cultural story telling throughout significant trail segments.</li> <li>• Interaction with histories around the mountain.</li> <li>• Eight Iwi histories</li> <li>• European settlement, Land wars</li> <li>• Dairying, Oil and Gas</li> <li>• Flora and fauna that changes as the journey progresses.</li> </ul>	<p style="text-align: right;">Doc No. 2033738</p> <p>There have been various business cases prepared for the development of the Kaitake Trail. The project is being led by the New Plymouth District Council and is also incorporated in their District Blue Print. The Taranaki Crossing of which the Kaitake Trail is part is also an important component of <i>Tapuae Roa</i>, and recently received a funding contribution from the Government. There may be an opportunity in the future for the Taranaki Crossing and associated Trail from Pukeiti to the coast to link to a wider network of trails around the Mountain. This would need to be discussed with the DOC who administer the National Park.</p>

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My personal view is that a trail of this nature could rank as one of the top rides in New Zealand. It would attract visitors spending between 1 and 5 days exploring the trail. These visitors would range from the adventurous self-supported, to the fully catered higher spending categories. If the other top trails are a guide 70,000 to 100,000 visitors per annum is not an unreasonable starting estimate.

This would incorporate a connection to Pukeiti and would deliver benefits region wide. It is likely that trail around Taranaki would draw larger numbers of visitors through New Plymouth than a New Plymouth centric trail, as currently proposed, could deliver alone.

I am not against the development of the Kaitake trail per se. However I believe there is a stronger business case for the region to go around the mountain, rather than prioritising a New Plymouth only option.

I would recommend the TRC consider seriously the benefits of a destination ride ahead of the incidental benefits of a day ride.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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30. Clive Neeson

Doc No. 2033608

Regarding the proposed Bike/walking Trail for Pukeiti:

As long time local of Oakura, I've presented Taranaki eco-adventure to millions of adventure travellers in Australia, Europe and North America with big cinema events:

<http://lastparadisefilm.com/photos/screening-it/>

Since 1990 I have been actively involved in the promotion and development of a vegetated bike/walk coastal trail from Oakura to Fort St George with the overview that it provides a wonderful link to Pukeiti via Petone Road and back down Koru Road. Thus far, we have organised the construction the two vital pedestrian bridges at Ahu Ahu road, (across Whenuariki stream) and at Weld road (across Timaru stream).

We also began the native tree vegetation of the path between Oakura and Weld Road in late in 1990 due to awareness that European cyclists in the late 1980's had abandoned New Zealand as a cycle destination because of main road traffic, harsh sun and wind exposure as most European cycleways are in forests or vegetated side-roads.

Our Oakura Coastal pathway project was presented with an environmental award by TRC in 1998. Despite being heavily used as far as Weld Rd, the vision for the loop to Pukeiti and the urgency to complete the coastal link to Fort St George (including a boardwalk around Weld Rd headland) has dwindled.

During the 1990's the bridges provided a fantastic and unique Ocean-to-Mountain link which enabled lunch/tea break at Pukeiti and an amazing downhill vista on return which we once cycled on a regular basis but as we age, the long detour up Greenwood Road has made it more difficult.

Oakura has established world recognition for its "mountain to sea" experience without the use of cars which is the theme that tourists are now chasing:

<https://youtu.be/mG3iqnXaapo>

Our research shows that tourists are looking for this unique point of difference (Mountain to Sea) i.e., an experience which demonstrates WHY Taranaki is like NO OTHER, rather than trying to imitate other enviable attractions like the Tongariro crossing. The Pukeiti coastal LOOP track would be the perfect

Acknowledge your considerable work in this area, the matters you raise are largely for the New Plymouth District Council to consider. The NPDC is leading the design and development of the Trail from Pukeiti to the coast and the matters you raise regarding linking this to the broader coastal walkway should be raised with them, and your other points are noted.



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mountain-to-sea experience . This seems to have been overlooked in funding and promoting of the vital coastal link.

With the advent of battery assisted mountain bikes, this sea to mountain loop has the potential to provide the greatest visitation to Pukeiti by an older demographic who are seeking one-day cycle trips with lunch break in the park and minimal motor vehicle usage.

The proposed new link from Oakura to Pukeiti will mean that instead of using Koru Rd as return, we will now be under bush cover for the long hot slog uphill and will completely avoid having to use the dangerous main highway 45. It should be noted that the loop would be done in the clockwise direction, where the uphill push to Pukeiti will be done in cooler shade and the downhill leg will take advantage of the sweeping open vistas of Petone Rd. With the regenerative braking of modern electric bikes, the battery is adequately recharged on the downhill run sufficient for powering the last leg along the coast back to Oakura Village. It therefore should be realised that the track will be heavily used by uphill traffic and needs to be designed as 2 way and in a way to discourage the dangerous situation which has developed in the Kaitake hiking track (extending from upper Wairau Rd into the National Park) whereby the braking of extreme downhill mountain bikers have severely damaged the walking surface with high speed downhill runs.

There is much tourist Air B&B accommodation in Oakura plus a growing local population for whom this loop would be attractive because it is door-to-door without the use of vehicles and shuttles.

For the above reasons I therefore propose to TRC as funders of the project:

That the beginning and end of the trail be in Oakura village, utilising a long-envisaged nature link along the Oakura river to Corbett Park rather than encouraging shuttle traffic up to carpark facilities on Surrey Hill. Village-based cyclists will have to contend with this traffic which will diminish the experience.

That Pukeiti pathway project funding also be used to assist the small completion budget required for completion of the Oakura-Fort St George link so that Pukeiti visitation can be boosted by this long awaited loop trail.

That the project be developed to the benefit of the Oakura community also, such that Pukeiti loop will

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appeal to Oakura community and resident eco-tourists who favour door-to-door cycling without assistance of motorised shuttles.

That the main pathway designed to be safe for uphill cycle and walking traffic and discouraging high speed downhill runs.

That the necessary land/swing bridges be installed so that the lower end of the path be at Corbett Park and/or utilise the unique nature experience along the Oakura River rather than encouraging motorised shuttle traffic up Surrey hill road.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan*.

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**31. Venture Taranaki Trust**

Doc No. 2033972

Support towards predator-free Taranaki.

Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.

We note that this programme of work supports the long term goal of a predator-free Taranaki. In the shorter term the reduction of predators in specific areas of Taranaki is also beneficial. The positive biodiversity outcomes from this predator reduction programme also increases the appeal of Taranaki as a visitor and lifestyle destination.

Support for Pukeiti/Taranaki Crossing

The Council's recent investments in Pukeiti have attracted more visitors to the region and encouraged them to stay longer. Further developments at Pukeiti and the associated Kaitake Trail to Oakura create opportunity for further visitor growth as well as providing recreational and lifestyle assets of appeal to locals.

These assets will be important in helping the region achieve the targets for visitor growth set in the Tapuae Roa Regional Development Action Plan released in April 2018. The Plan targets 7.5% growth in visitor numbers to the region in the period through until 2025.

The Council's investment in these assets will also help in the process of attracting central government investment to support development of other components of the Taranaki Crossing.

Other proposed changes:

We encourage the Council to further develop its relationship with the iwi of Taranaki on both operational and strategic matters.

Support noted.

We also encourage the Council to broaden funding for the regional Enviroschools programme. Venture Taranaki manages the Curious Minds programme in Taranaki which funds a range of community-based science projects many involving schools. This programme is complemented by Enviroschools.

Support noted.

Additional comments:

We note that the Regional Council has been closely involved in the development of the Tapuae Roa Regional Development Action Plan. There are many aspects to this Action Plan which the Council may choose to be involved in. The Council is a key contributor to regional development activities in partnership with the region's three District Councils and Venture Taranaki.

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The Council is owner of one of the key economic resources of the region – Port Taranaki Limited. We encourage the Council's investment in the Port to be utilised to encourage regional economic development.

The Council's current returns from investment in the Port (dividends) are already used to support economic development by the reduction in the direct cost of general rates.

The Council plays a key role in regional land transport planning. We encourage the Council to continue its focus on planning for improvements in the region's transport infrastructure. In particular there is further work required on State Highway 3 to the north of New Plymouth and on State Highway 43 between Stratford and Taumarunui.

The focus on key Taranaki transport projects will continue.

The Council also supports public transport services in Taranaki. We note that there is likely to be a need for improved transport services into and out of Egmont National Park. Such services may require some public support to get established as the demand for these services is intermittent. We encourage the Council to become involved in planning for such services.

The Council will be involved in planning for passenger transport services, but its statutory focus is on public transport for the transport disadvantaged.

We encourage the Council to continue working with New Plymouth District Council on matters related to bringing facilities at Yarrow Stadium up to appropriate earthquake standards. The Stadium is a key asset for hosting events in Taranaki and it is important that it is returned to full functionality as quickly as possible.

Support for solutions at Yarrow Stadium is noted.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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<b>32. Te Runanga o Ngāti Ruanui Trust</b>	Doc No. 2033898
<p>Te Runanga o Ngāti Ruanui Trust (Ngāti Ruanui) welcomes the opportunity to provide a submission on the Council's 2018/2028 Long-Term Plan (the plan).</p> <p>Ngāti Ruanui acknowledges our previous submissions and the changes adopted by the Council that have resulted in the current direction and layout of the plan.</p> <p>Overall Ngāti Ruanui supports the intention and direction of the plan and in particular the section outlining the Council's approach "Working Together with Māori".</p> <p>Managing water quality and improvements into the future is a significant area that the Council and tangata whenua must collectively work together.</p> <p>During the life of the plan water use and the standards applied will likely become more challenging including the impact on land management. Ngāti Ruanui believe the plan could better reflect these future challenges by providing more explicit reference to the partnership that will need to be fostered with tangata whenua. Significant changes will also be occurring with the governance and management of Maunga Taranaki which could also impact on the source of many rivers and how water is managed. In effect the plan should start to signal meaningful partnerships that will need to occur.</p> <p>Ngāti Ruanui recommends that additional paragraphs be added to the section "Freshwater quality" on page 5:</p> <p>"The Council intends to work closely with iwi and hapu of the region to develop the Fresh Water Plan recognising the kaitiakitanga role of tangata whenua and the need to secure a long term partnership which will further benefit freshwater quality"</p> <p>"The Council also recognises the likely changing role iwi and hapu may have in freshwater management and acknowledges the need for engagement and active involvement in freshwater water decision making throughout the life of this plan."</p> <p>In respect of the statement on page 5 "Working with iwi and hapu" while acknowledging work of the Taranaki Mayoral Forum Ngāti Ruanui does see the need to specifically tie increasing capacity to the forum. Ngāti Ruanui recommends the following:</p>	<p>Positive progress acknowledged.</p> <p>Noted.</p> <p>Agreed.</p> <p>Building on existing positive relationship and formalising these in a Mana Whakahono a Rohe (MWAR) relationship agreement for consents and policy should provide appropriate mechanisms for iwi input and appropriate partnerships for water management in the region going forward. The development of the relationship will be appropriately acknowledged in the LTP under description of resource management activities.</p> <p>Not supported at this stage as there are three iwi representatives on the Policy and Planning Committee and a commitment to enter into a MWAR with 8 Taranaki iwi.</p>

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"The Council is working with iwi to find the best way to make progress; this has involved work with the Taranaki Mayoral Forum. The Council is committed to working further with iwi and it is most likely....."

Suggested rewording is very similar to existing wording and not supported.

As noted above Ngāti Ruanui supports overall the section of the plan titled "Working Together with Māori". A number of minor amendments are suggested to assist in the continued strengthening of the relationship between Council and Māori; this recognises the evolution of the relationship to date and the relationship before us. Ngāti Ruanui recommends the following:

"Policy development"

"Provide opportunities to involve and actively engage Māori in major policy decisions ....."

There are iwi representatives on the Policy and Planning Committee involved in policy development.

"In carrying out these steps the Council will (new bullet point):

"Provide time to meet kanohi ki te kanohi (face to face) on major policy matters with iwi organisations where relevant"

There is a statutory consultation process followed by the Council for plans that involves kanohi ki te kanohi.

"Resource consent process"

"In carrying out these steps the Council will encourage applicants to consult where Māori may be an interested and/or affected party, as part of an assessment of environmental effects"

Supported and recognises the two roles iwi may have in the consent process.

It is likely that iwi organisations are now at a point where their engagement and ability to engage in environmental monitoring is greater. In this respect the statement relating to environmental monitoring should now be worded in a more pro-active stance to better reflect more robust engagement and involvement. Ngāti Ruanui recommends the following:

"Develop an active approach to ensure the participation of Māori in resource consent monitoring, including input into the design of monitoring programmes and specific measures for involvement in monitoring activities and plans"

This matter to be discussed as part of the MWAR process.

On page 27 Ngāti Ruanui notes a list of specific community outcomes, none relate to Māori; Ngati Recommends that the following:

"Specific community outcomes"

"An active partnership relationship continues to be developed with Māori, Iwi and hapu"

Supported as this recognises what exists and is evolving with resource management with iwi in the region. MWAR relationship agreement and Mātauranga Māori monitoring projects are examples.

On page 33 under the section relating to monitoring and reporting Ngāti Ruanui recommends that a new bullet point is added as follows:

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"With iwi and hapu - to ensure cultural and kaitiaki responsibilities are incorporated into reporting and monitoring where relevant"

On page 45 'Levels of service', 3 "Maintenance and enhancement of overall water quality in our rivers and lakes, groundwater and coastal waters" Ngāti Ruanui recommends that the following measure is included:

"Measure: cultural health indicators to show trends or changes in the health of water quality"

"Target (Years 1-10) - Improvements in the cultural health indicators established as part of the baseline 2019/20."

"Baseline: Cultural health indicators are developed in 2019/20 to provide a guide as to the cultural health of rivers and lakes, groundwater and coastal waters as consulted with Iwi and hapu of the region."

Long Term Plans represent future directions and aspirations. These plans also need to signal changes in management and approach and can be bold with a vision moving ahead. Ngāti Ruanui considers that the Regional Council has made good progress at leading change; with inclusive policy and developing strategic direction that include a partnership and relationship with Māori. Our recommendations maintain the good work started and provide the next steps at assisting in securing that partnership.

Mātauranga Māori monitoring project with iwi is the place to firstly develop cultural health indicators before their possible incorporation into the LTP. The project will be acknowledged in the LTP description of resource management activities.

Work undertaken and positive relationship and direction of travel also acknowledged.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes the two changes to the 2018/2028 Long-Term Plan.

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<p><b>33. Federated Farmers Taranaki</b></p>	<p>Doc No. 2033895</p>
<p>We oppose the current proposed rates increase of 3.5% per year and submit that the previous approach of keeping rates increases below 1% per year be continued.</p>	<p>Comment noted – difficult to achieve without the submitter identifying what programmes of work that it does not wish the Council to proceed with.</p>
<p>We support the most conservative option of focussing on completion of existing developments at Pukeiti, at a cost of \$900,000 over three years.</p>	<p>Support noted</p>
<p>We oppose the plan to change the voluntary model of the riparian programme, as we believe that the risks to its ongoing success would outweigh the benefits.</p>	<p>This is a matter for the Councils Freshwater Plan review, the 2020 target for completion of riparian fencing and planting has been communicated by Council for some time, and was included in the previous LTP.</p>
<p>We support Council's preferred option of implementing the first three years of a region wide predator control programme.</p>	<p>Support noted.</p>
<p>We have no specific comment to make on funding of a regional position for the Enviroschools programme.</p>	<p>Noted.</p>
<p>We note that more spending is proposed to support work with iwi and hapu. As few details are given of what this involves or the costings, it is difficult to make specific comment. We understand that few details may have been provided, because they have yet to be worked out. Farmers appreciate that engagement with stakeholders including Māori is vitally important, but we would appreciate seeing more information (if available) on how rate-payer money is to be spent in this area.</p>	<p>The costs are associated with the development and implementation of a Whakahono a Rohe agreements with Taranaki iwi that sets out iwi input to consents and policy processes as required by a recent amendment to the RMA. This is underway with iwi and councils and the financial outcome is unclear at this stage. However, a modest budget has been provided.</p>
<p><b>Recommendations:</b> That the Taranaki Regional Council: 1. <u>thanks</u> the submitter for their submission 2. <u>makes</u> no change to the 2018/2028 Long-Term Plan.</p>	



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34. Toimata Foundation

Doc No. 2033879

Enviroschools is a holistic framework that supports the development of resilient, connected and sustainable communities. Through Enviroschools children and young people plan, design and implement a wide range of sustainability projects in collaboration with their communities. Nationally over 1,100 early childhood education (ECE) centres, primary, intermediate and secondary schools are part of the Enviroschools network – a third of all schools and 6% of the large ECE sector.

Enviroschools is managed nationally by Toimata Foundation (a charitable trust).

The Enviroschools Taranaki network was first established in 2006. Currently there are 20 schools and 7 kindergartens in the region that are part of Enviroschools – 22% of all schools and 8% of all early childhood education (ECE) centres. While the size of the programme is relatively small compared to most regions, the Enviroschools network is doing some great work and there is huge potential to develop this further.

This submission covers the following points:  
We thank Taranaki Regional Council (TRC) for your proposal to broaden your educational outreach by funding a regional Enviroschools position. If this proposal goes through, it will mean that 100% of the regional councils and unitary authorities in New Zealand are supporting their communities to be part of Enviroschools.

1. Investment needed from TRC to ensure that Enviroschools will be effective in Taranaki:

The investment needed has three aspects:

- a) Enviroschools Regional Coordination role (included in draft LTP)
- b) Budget for Enviroschools events and projects
- c) Budget for Enviroschools Facilitators

We are proposing two alternative investment levels for consideration by council (page 4).

2. Enviroschools is a proven programme specifically designed to meet multiple Local Government outcomes...Enviroschools can contribute in a range of ways to “Our Future Taranaki”:

We acknowledge that extending education outreach forms part of the “Our Future Taranaki” picture. Investing in developing the Enviroschools network in your region can also contribute to:

Support for the Council’s proposed extension into Enviroschools is noted. At this stage, the consultation documentation and supporting documentation includes budget for the regional co-ordination role. To extract the biggest benefit out of this investment, the Toimata Foundation is suggesting increasing the Council’s contribution to cover Enviroschools events/projects and to increase the number of Enviroschool facilitators.

The Foundation has proposed two options based upon growing the number of schools at either a moderate or faster rate. For both of these options they are recommending a regional projects and events budget of \$2,500 for 2018/2019 growing to \$5,000 for 2019/2020 and 2020/2021 (option 1) and growing to \$7,500 in 2019/2020 and \$15,000 in 2020/2021 (option 2).

The \$2,500 proposed in both options for 2018/2019 is relatively modest and can be accommodated within existing budgets. Increases in 2019/2020 and 2020/2021 can be accommodated in the budgets and be further refined in those years’ annual plans.

The increased budget for Enviroschools facilitation of \$12,500 in 2018/2019 in both options would need to be funded by an increase in general rates of approximately 0.16% (3.5% change to 3.66% change). The requested increases in 2019/2020 and 2020/2021 can be included in the subsequent year budgets and can be reviewed as part of the preparation of the annual plans for those years.

There are four options to address the request for additional funding. These are:

Option 1: decline the request for additional funding in 2018/2019 and address the issue again in the 2019/2020 and 2020/2021 annual plans. The funding for the regional coordination remains unchanged.

Option 2: accept the request for funding for projects and events noting that these can be funded from existing budgets.

Option 3: accept the request for additional funding as outlined in Option 1 on page 4 of the submission.

Option 4: accept the request for additional funding as outlined in Option 2 on page 4 of the submission.

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- Biodiversity Protecting – towards a predator-free Taranaki
- Freshwater Health
- Connection with Māori

3. The Enviroschools implementation model provides value for council partners

Creating sustainable, resilient communities involves bringing together many different skills, perspectives and resources. The implementation approach and collaborative funding model of Enviroschools provides significant value for councils. It is based on councils providing cornerstone investment in regional implementation that equates to 20-25% of the total annual investment, with the balance being funded by other contributors.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. selects one of the options to address the submitter's request for additional funding
3. makes no further change to the *2018/2028 Long-Term Plan*.

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**Comments**

**35. PlastOil**

Doc No. 2033607, 2033732, 2033727

Please find our proposal for Plastic recycling in the Taranaki region. Please feel free to send to NPDC as well as I think Taranaki could be the first 100% plastic recycling region in NZ.

Responsibility for the planning and delivery of waste management is assigned through the *Waste Minimisation Act* to district councils. The proposal will be forwarded to the Taranaki Solid Wastes Management Committee and the three district councils for consideration.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan*.

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**36. NZ Forest Owners Association Inc**

Doc No. 2034014

Appendix 6: Charging Policies  
Charges for Monitoring under the National  
Environmental Standard for Plantation Forestry  
(NESPF) pages 171-172

SUBMITTER

The Forest Owners Association Incorporated (FOA) is the representative membership body for the commercial plantation forest growing industry. FOA members are responsible for the management of approximately 1.2 million hectares of New Zealand's plantation forests and over 80% of the annual harvest. The New Zealand harvest is currently approximately 30 million tonnes per annum, with resource available to increase to over 35 million tonnes over the next five years. Approximately 50% of the harvest is currently exported in log form, with the majority requiring phytosanitary treatment in some form such as fumigation.

The Forest Owners Association has a number of members within the Taranaki Region.

There is approximately 20,000 hectares of plantation forestry in the region. This is not a large proportion of rural land use especially in comparison with hill country farming.

FOA was involved as a participant in a government working group in the establishment of the NES-PF.

We OBJECT to the setting of the charge. The charge does not appear to be well thought out and in particular the charge is a misuse of the power to be able to fix a charge by proposing a monitoring regime which is not prescribed as a condition under the NES-PF.

Submission 1

Why the change to regulating forestry activities where permitted activities by their nature under the RMA have adverse effects that are less than minor?

The region is experiencing increased forest harvesting as forests mature and appropriate regulation is required. It is central government which has:

- promulgated the NES-PF and its permitted activities and conditions;
- confirmed that district and regional councils are responsible for overseeing compliance with those activities and conditions; and
- confirmed that councils may charge for its monitoring of those activities.

Permitted activities may have less than minor adverse effects, but this is not a pre-requisite for an activity being made a permitted activity. RMA section 87BB(1)(c) relates to a particular set of activities and is not a general statement about all permitted activities. In any event, the reason for permitted

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<p>Submission 2 There is no statutory power to establish a monitoring regime by way of the power of a fixed charge.</p>	<p>activity conditions is to ensure that adverse effects are properly managed, and to establish whether compliance is being achieved, monitoring is necessary and appropriate.</p> <p>District councils in the region have raised concerns about forest slash blocking road drains and culverts and causing significant infrastructure damage. Hence monitoring this provision of the NES is important.</p>
<p>Submission 3 Proposal charges appear to confuse the permitted activities with resource consents.</p>	<p>Contrary to what appears to be asserted in the submission (see the first four paragraphs under the heading "Submission 2"), the RMA and NES-PF give the regional council the opportunity to legally monitor compliance with particular activities in the NES-PF.</p> <p>Regulations 22 and 24 (earthworks), 36 and 37 (river crossings), 50 and 51 (forestry quarrying) and 62 and 63 (harvesting) of the NES-PF make it clear that oversight of these activities is the regional council's function. Regulation 106 of the NES-PF confirms that this function includes monitoring, and allows monitoring charges to be set in relation to the activities set out in regulations 24, 37, 51, and 63(2). As authorised under section 36(1)(cc) of the RMA, the Council has set monitoring charges for the components of the monitoring that it may undertake to determine compliance with the conditions in the NES-PF that must be met for those activities to be permitted. The monitoring cost is considered reasonable in respect of the activity to which the charge relates and meets the criteria in RMA section 36AAA.</p> <p>Feedback on the pre-site assessment is accepted and the charges will be amended. The first inspection after notification has been received can address the same matters.</p>
<p>Submission 4 Use of MCI monitoring</p>	<p>The submission is accepted and the wording in the explanation, which addresses permitted activities and resource consents in the schedule will be clarified.</p> <p>The NES-PF explicitly requires potential adverse effects upon in-stream communities to be considered and monitored. The reasons put forward by the submitter against using macroinvertebrate monitoring do not reflect the reality of how this methodology has been applied by the Council (and elsewhere in New Zealand) for more than three decades, with the use of control and reference sites as well as impact monitoring. The RMA explicitly requires temporary as well as permanent effects to be considered.</p>

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Submission 5

Purpose of "monitoring regime"?

The charges specify the sections of the NES-PF that they are monitoring. For regulation 26 MCI and sampling is proposed. This regulation is explicit and relates to sediment originating from earthworks not having certain effects on the receiving environment which should be monitored. The NES-PF contains conditions concerning environmental standards and environmental outcomes.

Submission 6

Charges are expensive for what has been considered a sustainable land use in the region and will lead to little investment in plantation forests.

The cost of the monitoring is considered reasonable in the financial context of the activity. The Council's long standing cost recovery policy is for resource users to meet the reasonable cost of monitoring and not the ratepayer. The proposed monitoring is specifically related to the provisions of the NES. Verbal feedback from forestry companies, contractors and owners in this region at a recent March MPI workshop on the NES-PF is in support of the proposed monitoring as long as the likely costs were reasonable and there was clarity in the LTP about when they would apply in relation to the size of the forest. Under monitoring of forestry activities was acknowledged with poor quality non-compliant contractors undermining compliant professional operators.

Other regional councils in NZ are following a similar regulatory approach.

Manuka and kanuka plantations for honey production are not being monitored under the NES.

Manuka and kanuka plantations are not considered to have the environmental effects as plantation forestry and have not been included in the monitoring regime at this stage.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes the two changes noted above to the *2018/2028 Long-Term Plan*.

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**37. Climate Justice Taranaki Inc**

Doc No. 2034043, 2034044

Climate Justice Taranaki Inc. (CJT) is a community group dedicated to environmental sustainability and social justice. This includes issues of inter-generational equity, notably in relation to climate change, which will impact future generations' inalienable rights to safe water, air and soil, crucial to sustaining livelihoods and quality of life. CJT has been incorporated under the Incorporated Societies Act 1908 since 26th February 2015.

CJT welcomes the opportunity to provide feedback on the Taranaki Regional Council's Draft Long-Term Plan 2018/2028. This submission goes beyond the two key proposals on which Council is seeking feedback. It also bears relevance to the Proposed Taranaki Coastal Plan.

CJT sees both the Consultation document and Draft Long-term Plan as highly aspirational, and if these aspirations are achieved, Taranaki's environment and community will be the better for it.

**Towards predator-free Taranaki**

CJT supports the principle of a predator-free Taranaki. Indeed, some of our members are active in voluntary pest trapping programs, with various organizations focused on this goal.

Support noted. A range of methodologies will be used and tested to manage predator numbers to very low levels.

We believe that predator control and eradication strategies should focus on a major increase in targeted trapping, potentially incorporating more efficient trapping technology. Trapping should be undertaken by trained professionals including DoC and Council staff, contractors and members from NGOs. It needs to be adequately funded by regional and central governments and be much less reliant on volunteers.

We do however urge caution in considering other strategies, some of which, notably genetic manipulation of species, are unproven and may have significant side-effects or unforeseen and even irreversible consequences. Some of our members also hold strong reservations over largescale application of poisons. While predator eradication is not CJT's core goal or purpose, we stand alongside other groups that are more focussed on these issues.

**Pukeiti / Taranaki Crossing and funding alternatives**  
We note the remarks, "This opportunity to expand the tourism offering comes in the wake of sharp reminders that Taranaki's core businesses of dairying and hydrocarbons are subject to fluctuating international pressures that are beyond the region's control" (p.4 of Draft LTP), and:

Support noted together with other comments on the funding sources and issues. The Council has risk strategies in place to manage the reliance upon port dividends and the potential for those dividend levels to fluctuate.

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“Port Taranaki Ltd operates in a highly competitive trading environment and there are no guarantees that it will be able to continue to deliver forecast dividend levels... This is the biggest risk to the delivery of the Council’s proposed programmes” (p.6 of Draft LTP). Heavy reliance on the petrochemical industry for Port revenue as a major Council income earner is a real concern and must be addressed.

Noted

CJT also notes that tourism is subject to pressures beyond the region’s control, especially international tourism. It is important to recognise that NZ’s tourism is, and will likely remain, largely nature-based and is therefore incompatible with industrial dairying and hydrocarbon mining.

Reducing the impacts of these two incompatible sectors and restoring damaged land and waterways could be the best investment to support tourism that is dependent on the ‘clean, green’ image of New Zealand, which is, unfortunately, fast-eroding.

The adverse environmental effects claimed are not supported by evidence.

One of the constraints to tourism development, especially international tourism, is the likely increase in fuel prices leading to unaffordable airfares, as countries step up to greenhouse gas (GHG) reduction and climate change commitments as per the Paris Agreement<sup>1</sup>. International tourism is not sustainable for as long as it is heavily dependent on fossil fuels or biofuels, the largescale production of which would potentially outcompete food crops.

CJT recommends sustainable tourism that is less dependent on fossil fuels and built structures, and more sensitive to the natural environment and carrying capacity of the sites. E.g. The tarns on the Pouakai Crossing are extremely sensitive and fragile to disturbance. Any increase in infrastructure and services that increases visitation has the potential to damage the tarns and nearby ecosystems. Careful control and management measures by relevant authorities, as well as education, are needed to avoid environmental impacts.

Agree we need sustainable tourism and appropriate investment in infrastructure to address any adverse environmental impacts.

The access roads to Pukeiti are narrow and blend well with the natural landscapes and should be kept as such. If tourist numbers increase significantly, traffic congestion and impacts may be avoided by the introduction of a ‘park and ride’ scheme supported by a shuttle bus service, preferably electric.

Noted

In terms of alternative income generation and livelihoods, bearing in mind the volatility and environmental impacts of industrial dairying, fossil fuel mining and international tourism. CJT is of the opinion that Taranaki should be more proactively

For the farming sector to address.



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developing sustainable agriculture. There is a growing market for organic produce, locally and internationally, with demonstrable health benefits. We suggest that expanded focus and support for well planned, ecologically sustainable forestry projects, as part of a more diversified agricultural base for the region, are urgently required. Focussing on crop diversity, regeneration of soil health and local foods, and linking with local networks, will help ensure nutrition, well-being and resilience in our communities. These are becoming ever more important with increasing climate disruptions.

CJT recommends that the substantial financial commitments proposed in the LTP, especially for options 2 and 3, should be spent elsewhere, such as supporting sustainable agriculture which produces positive environmental outcomes, public transport, hazard management, just transition (See points 20-22), and improving environmental management and compliance monitoring (See points 51-52).

If either option 2 or 3 is adopted, we ask that Council ensures that local iwi are actively involved in the planning, decision-making and management of the programme. We do not recommend acceptance of corporate funding from the fossil fuel and petrochemical industry. If such funding is accepted by Council, we ask that no advertising of the funding source is made. Industry has used this ploy repeatedly to buy their social license to operate, a deliberate tactic to delay the urgent transition to renewable energy.

Public Transport

CJT submits that far greater efforts and investments are needed to support public transport and electrification of transport, to reduce greenhouse gas emission, better meet public demand and respond to central government's recent draft Policy Statement on Land Transport.

CJT reminds Council that WITT has submitted a request to consider a daily coastal bus service from Hawera to New Plymouth along SH45, to ensure that the lack of public transport is not a barrier to tertiary education and accessibility to essential services. This request is supported by coastal communities like Opunake and Okato. With central government's proposed funding expansion for public transport, there is good reason to seriously consider this request.

CJT also ask that Council incorporates some level of support to facilitate the uptake of electric vehicles and community EVs, in line with central government priorities.

The Council's compliance monitoring regime is second to none in NZ and does not need further investment.

Tangata whenua have been involved.

The Council continues to work within Government guidelines and funding constraints to expand the use of public transport and the types of vehicles being used.

The Council has worked closely with WITT in regard to this service. At this stage the "ball is their court". We await WITTs next move.

The Council does not have a role in advocating for the public uptake of electric vehicles. There is a project underway looking at the use of electric vehicles in the Council's fleet.

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Hazard Management, Infrastructure Strategy & Just Transition

CJT strongly supports considerations of climate change in the Hazard Management section of the Draft LTP. However, use of the 1 % annual exceedance probability (1-in-100-year event scenario) as a baseline needs to be placed in the context that historical frequencies and intensities of extreme events (rainfall, flooding, droughts etc.) no longer apply, the result of climate disruption. The frequency and intensity of extreme events will continue to increase in coming decades.

The submission states in a number of places that the Council must address coastal erosion and storm surge. These are matters for district councils through land use policies and consents. Future climate change has been taken into account in the design of flood control assets.

In this overarching respect, CJT does not accept the statement in the Consultation document that: "There is no planned upgrade to the level of service provided by the Schemes before 2060. The risk to the Schemes' infrastructure arising from natural disasters is low." Flexibility and preparedness are key to dealing with unpredictable and increasingly frequent, extreme weather events causing dangerous hazards to people and infrastructure.

The flood control schemes in the region have been designed to address climate change impacts to 2060.

In addition to river and flood control, hazards due to coastal erosion and storm surge, exacerbated by sea level rise associated with climate change, must also be addressed. By way of an example from other NZ regions, "If there were to be a 30cm sea level rise between now and 2065 - a relatively conservative possibility - what are today considered extreme, 1-in-100-year high water levels will occur annually in both Wellington and Christchurch. There are 32,000 homes within 1.5m of the current mean high tide level," warned Tim Grafton, CEO of Insurance Council of NZ.

In relation to infrastructure strategy and financing, Prime Minister Jacinda Ardern recently stated<sup>10</sup>, "Essential part of our transition plan are the governments' Provision Growth Fund and Green Investment Fund, which will invest in billions of dollars in local infrastructure and clean energy projects in areas that currently have a lot of jobs that rely on the fossil fuel sector." CJT strongly urges Council to actively engage in and support this crucial transition.

Noted

Resource Management

Page 40 of the Draft LTP states that: "Resource management activities will contribute primarily to the outcome of a Sustainable Taranaki. They will also assist in the achievement of a Prosperous Taranaki by enhancing Taranaki's clean, green image and ensuring it remains a reality in overseas markets as well as emphasising Taranaki as an attractive place to work, do business and visit."

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How clean and green is Taranaki?

Unfortunately, Taranaki does not have a 'clean, green' environment outside of the Egmont National Park, and if such an image exists in overseas markets, it is based on PR rather than reality.

See the Council's State of the Environment reports to show current environmental state and improvements. The Council routinely reports on the state of the region's environment through reports based on robust scientific data and independently peer reviewed.

Taranaki's economic base has been built largely on industrial dairying and mining of fossil fuels, both of which have been operating in the region for more than a century. At present these industries are major contributors to New Zealand's economy and greenhouse gas emissions (See point 49 below), which on a per capita basis are high globally. CJT recognize that the RMA presently precludes considerations of emissions per se, but nevertheless we urge Council to consider the implications carefully, for the future of our region, as indeed NZ more generally, depends on decisions made now. We simply have no more time for prevarication. Just as extreme weather events, floods and droughts will gain strength over coming decades, so too will rising sea level increasingly claim coastal land and infrastructure.

The submission urges the Council to consider the implications of GHG emissions. The Council does so consistent with Sections 7 (i) and 104E of the RMA, whereby the Council has particular regard to the effects of climate change.

In addition to the large emissions of greenhouse gases, these industries use the environment as a dumping ground for other forms of pollution, largely with no charge, some, but not all of which is permitted by Council under numerous resource consents. Implicit, but unsaid, in these consents is the outdated notion that 'dilution is the solution to pollution'. CJT proposes that 'polluter pays' is a more equitable approach economically, although we should be transitioning rapidly away from highly polluting, unsustainable forms of industry (See point 22). While Council claims that most of the costs associated with agriculture and the oil and gas industry are covered by "user-pays direct charges" (p.80 of Draft LTP), we understand that such charges merely cover the administrative costs of consent processing and monitoring, not the actual environmental or remediation costs.

The submission urges the Council to impose the costs of remediation of pollution on dischargers. Current policy already means the Council seeks to recover remediation costs from polluters for non-compliant events where practical, while discharge consents have conditions that reflect the assimilative and attenuation capacity of receiving environments in line with the RMA.

At present, the consent system allows the more or less regulated discharge of thousands of tonnes of waste water, soils, drilling muds and fracking chemicals, and gases each year into Taranaki's receiving environment.

All these discharges are appropriately regulated and environmental effects, if any, reported in annual compliance monitoring reports.

By way of example: "Methanex holds two consents to allow it to take and use water from two abstraction points on the Waitara River. Six consents allow the discharge of effluent / stormwater into the Manu and Waihi Streams and the Tasman Sea via the Waitara

The Council's consent conditions for disposal of drilling wastes have been exhaustively audited by independent experts and reflect best current guidance.

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marine outfall. Methanex also holds two consents to discharge emissions into the air at its sites.”

Pollution levels and extent

Although some of the discharged wastes from industry (mainly from dairying and fossil fuels) are considered ‘benign’ eco-toxically and environmentally, having been treated to greater or lesser degree to reduce impacts; others are not so benign. The latter pose a range of issues for land use, agriculture and human health, among other aspects, and leave a toxic legacy for future generations.

At present, despite concerted efforts towards ecological and economic sustainability by some local farmers, most dairying here operates on a high input industrial model heavily reliant on application of large quantities of urea and other fertilizers. Being derived locally from fossil-fuel, urea has been both readily available and affordable, and has enabled high stocking rates and enhanced production. Unfortunately, the resulting environmental impacts are widespread, indeed near ubiquitous, around the Mount Taranaki ring-plain.

Air pollution

Taranaki’s air quality is considered to be good by national standards, in large degree because of the prevalence of strong winds dispersing pollution. Nevertheless, chronic air polluting emissions are readily apparent from the aging industrial plants (Methanex, Ballance, Maui Production Station...), all of which are now decades old.

Venting and flaring of ‘excess’ gas in fossil fuel production are widespread across Taranaki, with episodic major releases raising significant concern among local residents and fire services<sup>11</sup>. The large amount of GHG, volatile organic compounds and other emissions that are produced via venting and flaring contribute to air pollution and pose a significant health risk to local people.

Workers at the Fonterra plant at Pahiatua contracted Legionella disease, presumably in water droplets from the cooling tower<sup>13</sup> and CJT understands that the coastal Methanex plant uses toxic biocides to control aerial release of Legionella.

Air pollution and associated hazards arising from fossil fuel mining and production are at the centre of Taranaki Energy Watch’s (TEW, Dec 2016) challenge to South Taranaki District Council in response to what TEW consider to be inadequate setback distances, among other aspects of air emissions, in the Environment Court, with a decision expected mid-2018.

Comments on pollution levels, air pollution, and soil pollution reflect the submitter’s views and do not require the Council to consider amendment to the LTP.

The extent of effects and impacts of dairying are determined through the state of the environment report and do not align with the views of the submitter.

Disagree that there is any chronic air pollution in the region and note the Medical Officer of Health does not share this view as shown by his lack of interest in air discharge consents.

Results of the appeal will establish case law.

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Soil pollution

Across the region, soil pollution is caused primarily by industrial dairying, with more localized contributions from fossil fuel processing and waste disposal, and other industries. The Taranaki dairy herd, estimated by the Agricultural Production Census (APS) and Agricultural Production Survey (Stats NZ with the Ministry for Primary Industries) at more than half a million cows (541,931 in 2015), has been supported by unsustainable application of urea fertilizer derived from fossil fuels, and through importation of palm kernel from palm oil plantations. As noted by the central government:

“High livestock numbers can affect native biodiversity and soil health. High livestock numbers can also impact on water quality because nitrogen and bacteria from urine and faeces can leach into groundwater or run off the land into rivers and lakes.”

Notably Taranaki has the highest levels of Cadmium in soils of any region in New Zealand, associated with dairying and derived from high levels of fertilizer application (Taylor et al. 2007 Soil maps of Cadmium in New Zealand). Landcare Research Report for Ministry of Agriculture and Forestry). Although Taranaki’s cattle population has not risen in decades (actually showing a small decline), it is unsustainable without these high levels of inputs. This is not wise management practice, as was apparent during the prolonged drought of November 2017 - March 2018.

Land farming - the practice of disposing drilling wastes on farms, remains a serious threat to soil health. There have been documented cases of breaches of consent conditions and groundwater contamination. The Parliamentary Commissioner for the Environment highlighted the issue of stock grazing on land farmed areas before targets for persistent contaminants are met. It is unclear whether the issue has been resolved. CJT is also gravely concerned about the variation of consent conditions over time, generally weakening environmental protection. E.g. The consent 7559-1 (20/11/2009) to discharge drilling wastes (including water based and synthetic based drilling muds) via land farming at the Surrey Road site held by C. Boyd included these conditions: “7. The exercise of this consent is limited to wastes generated within the Taranaki region”; “10. An area of land used for the land farming... shall not be used for any subsequent discharges of drilling waste”; and “15. No discharge shall take place within 25 metres of a water body [including farm drains], or property boundary”. Consent 7559-1.3

See State of the Environment Report and the NIWA report to 24 April Policy and Planning Committee on the impacts of dairying and the impact of the Council’s interventions.

Soil health and groundwater monitoring does not support the submitters points.

Not supported by scientific evidence and independent review. See earlier comments on the Council’s regularly control of land farming.

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(25/02/2016)<sup>19</sup> for the same site now allows for: “8. ...waste generated in the Taranaki region, including from outside the 12 nautical mile maritime limit within the Taranaki Basin”; “11... further applications of material...”; and “16. No drilling waste shall be discharged within: a) 12 metres of property boundaries; or b) 12 metres of the Mangamawhete, Mangatengehu and Waipuku Streams; or c) 6 metres of any other surface water course (including farm drains)...”

Coastal pollution

This is also increasing rapidly along sections of the Taranaki coast, from both diffuse and point sources, most of which are difficult to pin-point. Recent king-tides associated with the passing of tropical storms deposited large amounts of plastic and other litter along roadsides (eg. Komene Beach and S of Bayly Rd approaching Cape Egmont). Local people attempted clean-ups in some places, but the scale of the problem is too great for individual volunteers.

Coastal pollution: the submitter strongly recommends the Council takes a lead on removal of plastic litter from the marine environment. This is outside the Council's jurisdiction, litter being a matter for the district councils under various Acts.

As this is an obvious example of the declining state of Taranaki's environment, it is strongly recommended that Council take a leading role in its appropriate removal and disposal. This could potentially be achieved through liaison with the Ministry of Justice and the Community Service system, or NGOs.

Water pollution

Taranaki closely follows Waikato (largest regional dairy herd) in having the highest levels of Nitrate leaching, most of which derives from dairying. Consequently, most rivers and streams running across the ring-plain carry episodically high loads of dairy-associated pollution following heavy rain (including nitrogen and phosphorous). This is obvious to people along the coast – fishers, swimmers, surfers, beachcombers and others – in the highly discoloured waters emanating from streams and rivers into coastal waters.

Water pollution: the submitter questions the adequacy of the Council's water quality programme. The Council can note that the programme has been reviewed through audits and external reviews, and found to be satisfactory. Recent trend analyses of water quality data show positive trends in Taranaki.

Council, to its credit, has initiated a riparian planting program, which will provide some uptake and impedance of runoff, although it cannot adequately address subsurface flow of the main water eutrophying nutrients, and hence will not solve the problem.

This world class programme is achieving biodiversity and water quality improvements. Refer recent NIWA report noted above.

The Ministry for the Environment now requires Regional councils to specify the nutrient levels they are aiming for in their regional plans.

In the section 'Levels of Service' from page 45 of the Draft Plan:

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3. Maintenance and enhancement of overall water quality in our rivers and lakes, groundwater and coastal waters  
Measure: Parameters that characterise the physical, bacteriological, biological and chemical quality of surface water.  
Target (Years 1-10): Improvements in nutrient levels (ammonia, nitrate, total nitrogen, and dissolved reactive and total phosphorus), appearance (turbidity, clarity, absorbance, suspended solids), organic contamination (biochemical oxygen demand), bacterial levels (faecal coliform and enterococci bacteria), temperature, and algal cover, against a baseline of 1995 water quality, as applicable, at 11 representative sites.

CJT notes that at present Council monitors only a small number of sampling sites (11 sites) and questions their adequacy to provide a comprehensive assessment of the biochemical condition of Taranaki's waterways. We could not find any pilot studies by Council to assess the number of sampling sites and times most appropriate for this important task. These should be based on analysis of the statistical power to detect change, in consultation with independent water quality specialists (see Monitoring below). CJT also question whether the MCI method used by Council for stream fauna assessment is the same as, and hence directly comparable with, the indices used by other Councils and central government? If not, then this needs to be rectified, to enable a fair national assessment to be made.

Compliance Monitoring  
Council has a significant monitoring program of discharges, as required under the RMA and other legislation. The program produces regular reports, many of which are accessible to the public. CJT has previously raised various issues regarding the design, methodology and results of certain past studies. Here, we express continuing concern about the level of 'self-assessment' in environmental monitoring that is conducted by the fossil fuel and related industries.

CJT stresses that this 'trust us' approach to industry in permitting self-assessment is not indicative of a fully independent approach by Council, the environmental 'watchdog', from those who are polluting the environment. One example of many: "The Council's monitoring programme for the year under review at each site included four inspections, continuous self-monitoring by Methanex..."

CJT notes that in the Methanex Air Monitoring report for 2014-15, quantitative sampling of ambient air quality, conducted by a third party, occurred on just 2 days in 2014 and one day in 7 2015. This could not be

The submitter confuses the number of physico-chemical (13) and ecological (57) sites.

Compliance monitoring: the submitter challenges reliance on self-reporting, especially by the petrochemical industry. The Council can note that self-reporting as a component of compliance monitoring is considered best practice, by way of promoting a sense of responsibility and awareness, and well as providing additional information at no cost to ratepayers. More importantly from the Council's perspective, self-reporting takes place within the context of auditing by the Council e.g., inter-laboratory comparisons, and in practice almost receiving environment monitoring (as distinct from discharge monitoring) is undertaken by the Council in any case. There is no 'trust us' approach within the Council's monitoring programmes.

The submitter strongly recommends that the Council undertake GHG emissions monitoring. Officers consider that the Council should not and generally cannot undertake monitoring of activities for which it

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<p>considered as 'continuous self-monitoring'. No measurements were made of Carbon Dioxide emissions, following a 'minor variation' by Council to the resource consent in 2005, itself following changes to the RMA.</p>	<p>does not have statutory responsibility, including GHG emissions monitoring.</p>
<p>However, earlier measurements (made before the amendment to the RMA) at the Ballance Kapuni urea plant, under special condition 5 of the now expired resource consent 4046-2, revealed that from July 2012 – June 2013, 170,000 tonnes of CO2 were emitted to the air from the plant. Current resource consent 4046-3 no longer requires monitoring of CO2 emissions. Both consent variations followed the 2004 amendment of the RMA which precluded regional councils from considering the effects of discharge of GHG on climate change when making a rule. However, the amendment did not preclude councils from monitoring GHG emissions; and as a matter of principle, we do not agree with the RMA amendment, as climate change must be at the core of all resource management decision making.</p>	<p>As above.</p>
<p>Notably, the 2016 National GHG Emission Inventory revealed the need for greater transparency of data, especially concerning the reporting of non-energy uses of fuels (e.g. by Methanex), as well as fugitive Methane emissions from natural gas processing<sup>25</sup>. CJT notes that regional councils have a role to play here, in ensuring that monitoring and reporting of GHG and other emissions are transparent and comprehensive.</p>	<p>As above.</p>
<p>CJT strongly recommends that Council undertakes the physico-chemical monitoring itself, rather than being focused mainly on observational visits. We ask that greater allocation of funding is made available from industry for more robust and independent compliance monitoring.</p>	<p>As above.</p>
<p>CJT calls for an independent technical review of the current discharge consent conditions and compliance monitoring programme, especially concerning the petrochemical industry.</p>	<p>Not supported and there is no evidence to suggest such a review if required given the Council is using best practice.</p>
<p>The decades ahead Climate science indicates that adverse climatic conditions will become more frequent and intense in future. Unsustainable forms of resource exploitation are not inter-generationally equitable, and their economic viability is reliant on continued mining of fossil fuels, which must end within decades, from exhaustion of reserves, increasing costs, and/or more enlightened regulation. CJT urges Council to work effectively towards the latter</p>	<p>Noted.</p>



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**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan*.

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38. Sustainable Taranaki

Doc No. 2034024

Sustainable Taranaki is the new public name for the work of the Taranaki Environmental Education Trust. The Trust has been working to advance environmental education and conservation and sustainability outcomes in the region since 1992, last year celebrating our 25-year anniversary.

TRC support for Sustainable Taranaki. We warmly support TRC's proposed funding for a Taranaki Enviroschools educator. However we would also like to request financial support from TRC to support Sustainable Taranaki's work educating and promoting environmentally preferable behaviours and actions to residents throughout Taranaki. We would like to become a key delivery partner of TRC's environmental education strategy within the community.

In addition to funding support, we would like to be included as a key TRC stakeholder who represents, supports and connects with the Taranaki public and business community on environmental issues.

Background on Sustainable Taranaki  
We run a variety of programs to inspire and support individuals, youth, businesses and communities to value the environment and prioritise sustainability around Taranaki:

- Workshops that demystify sustainability and give residents hands-on skills to reduce environmental impacts.
- IMPACT sustainability youth action incubator program
- Taranaki Sustainable Backyards Trail
- Events Calendar, monthly email updates, and face-to-face workshops and events.
- Presentations, training and inspiration for businesses, teams, clubs or groups
- Inspiration and support via social media, including linking to TRC resources, programs and events.

We are also in the process of developing environmental education resources and prioritised action suggestions on our website in TRC priority areas such as Healthy Land and Biodiversity, Fresh Water, Clean Air and Green Transport. These will be shared with TRC staff for review.

Sustainable Taranaki works with the following audiences within Taranaki on environmental education:

- Youth from 12 - 24 in our Impact action incubator program, with projects often focusing on biodiversity, weeds, planting and pest trapping

Support for the Enviroschools proposal is noted.

The TRC has not previously supported Sustainable Taranaki (previously the Taranaki Environmental Education Trust).

There are no current budget for extending the education programme to Sustainable Taranaki nor is there any budget for them to become a proponent of the Council's programmes.

The submitter has not outlined a programme of works or an associated budget. Should the Council wish to extend existing programmes to Sustainable Taranaki, under the Revenue and Financing Policy, this work would be funded from general rates. As a guide, every \$78,800 of additional expenditure equates to a 1% general rates increase.

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- Adults (individuals and groups) who are curious about the environment and those actively wanting to reduce their environmental impact
- Adults who aren't yet engaged on environmental issues
- Businesses, organisations and groups.

For more on Sustainable Taranaki and our work, please visit [www.sustainabletaranaki.org.nz](http://www.sustainabletaranaki.org.nz).

Each year we reach an estimated 5,000 residents with our environmental education, and with your support, want to scale up our work to reach as many Taranaki residents, businesses and groups as possible.

Environmental education of the general public is challenging work to fund over time, and we could do much more to achieve both TRC's and our own goals relating to environmental outcomes with your support.

Sustainable Taranaki's work would directly support the major initiatives and programs TRC are wanting to expand over the coming decade:

- Biodiversity protection – towards a predator-free Taranaki
- Pukeiti – a visitor hub for the Taranaki crossing
- Educating future generations
- Managing freshwater health
- Connecting with Māori.

Our work also contributes to the majority of TRC program priorities set out in the plan. Specifically, we would contribute to the goals of the following programs:

Supporting livelihoods

- Managing and protecting natural resources
- Targeting pest plants and animals
- Riparian management
- Self-help possum control.

Improving lifestyles

- Environmental monitoring
- Buses
- Council gardens
- Restoring habitats.

Taking Taranaki forward

- Advocating for the region.

We look forward to discussing Taranaki Regional Council support for our work with your Councillors and team, and would be happy to provide further information on our operational costs and the work and outcomes we could create with TRC's support.

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Initiatives we support in the 2018-2028 Long-Term Plan Taranaki Regional Council Consultation Document.

- Broaden your educational outreach by funding a regional Enviroschools position.

Support noted.

As the organisation that helped establish and run Enviroschools in Taranaki in its initial years, we are very supportive of your planned funding support for a Taranaki coordinator for the Enviroschools program. This will bring a wide range of benefits tangatahi, teachers, schools, families, and future generations throughout Taranaki by knowledge and valuation of the environment being.

We are also in support of the following TRC proposals:

- Towards predator-free Taranaki
- Pukeiti/Taranaki Crossing
- Further develop its relationship with Māori, focusing on operational areas.
- Commit more resources to freshwater monitoring.

Support noted.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan*.

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<b>39. Mokau ki Runga Regional Management Committee</b>	Doc No. 2034200
<p>Support towards predator-free Taranaki.</p> <p>Does not support Pukeiti/Taranaki Crossing.</p> <p>Yes, we believe that council should further develop its relationship with Māori, particularly focussing on operational areas.</p> <p>Yes, we believe that more Council resources should be committed to freshwater monitoring.</p> <p>Yes, we believe that Council should fund a Regional Enviro-schools position to broaden Council's environmental education outreach.</p>	<p>By way of introduction this organisation represents the southern part of Maniapoto Iwi rohe, determined by a recent Treaty Settlement process, that includes a small part of the TRC area. So there are 9 iwi in the region. Council will need to communicate with iwi who have overlapping rohe in terms on how to involve the Committee into any Mana Whakahono a Rohe processes for iwi input to consents and policy.</p> <p>Support for programmes and opposition to Pukeiti/Taranaki Crossing noted.</p>
	<p><b>Recommendations:</b></p> <p>That the Taranaki Regional Council:</p> <ol style="list-style-type: none"><li>1. <u>thanks</u> the submitter for their submission</li><li>2. <u>makes</u> no change to the <i>2018/2028 Long-Term Plan</i>.</li></ol>

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<p><b>40. Stratford Primary School</b></p> <p>Support towards predator-free Taranaki.</p> <p>Support for Pukeiti/Taranaki Crossing.</p> <p>Stratford Primary School strongly supports the initiative for Taranaki Regional Council to form a partnership with Taranaki EnviroSchools to provide more funding and a Coordinator to grow the role of EnviroSchools throughout Taranaki. Stratford Primary School is a very proud EnviroSchool, we are totally committed to the continuation of awareness and education towards a more sustainable future for our tamariki.</p> <p>The skills that the students develop will help them to become global citizens assisting them in the ability to make effective changes now and in the future to protect all of our environment. They are our future! Throughout the school there is living proof and connections to how we care for, nurture and strive to continually develop our environment in a sustainable manner. However this takes a huge amount of time and effort from our staff and community.</p> <p>More funding and extra facilitator hours are needed to support us and other Taranaki EnviroSchools to further build upon our sustainable practices, develop programmes and ongoing initiatives to move us forward. We need all Taranaki schools on board. At present it is noticeable that with a lack of funding and facilitators, progress is very slow.</p> <p>It is evident that EnviroSchools in other regions of New Zealand that have the Regional Councils on board seem to be far more advanced, it is unfortunate that Taranaki seems to be lagging behind.</p> <p>It would be more cost effective and beneficial to form a partnership with Taranaki Regional Council who have the expertise, resources and professional staff. A similar vision in educating for sustainability would have more of an impact combining Taranaki EnviroSchools with Taranaki Regional Council.</p> <p>Together we can achieve more and keep up with other regions in New Zealand.</p>	<p>Doc No. 2034280 &amp; 2034279</p> <p>Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.</p> <p>Support noted.</p> <p>Refer to the submission by Toimata Foundation.</p> <p><b>Recommendations:</b> That the Taranaki Regional Council: 1. <u>thanks</u> the submitter for their submission 2. <u>makes</u> no change to the 2018/2028 Long-Term Plan.</p>

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**41. Mr Matthew Jane**

Doc No. 2034255

Support towards predator-free Taranaki.

Support for Pukeiti/Taranaki Crossing.

Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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<b>42. Rotokare Scenic Reserve Trust</b>	Doc No. 2034276 & 2034272
Support towards predator-free Taranaki. We strongly support this proposed programme, and look forward to opportunities for collaboration with community organisations.	Support for the Biodiversity predator-free project and the Pukeiti/Taranaki Crossing projects is noted.
We support improved relationships with Māori.	Support noted.
We agree that increased freshwater monitoring is worth doing.	Support noted.
We encourage pro-active community education initiatives – this however we wish to express our sincere hopes that collaboration and consideration of community organisations delivering environmental education are an important element in any decision making process to increase education.	Comments noted.
The Rotokare Trust wishes to offer congratulations for the many achievements Council has delivered regarding biodiversity restoration.	Noted.
<p>Submission</p> <p>We ask that the Taranaki Regional Council continue its financial support for Rotokare via Wild for Taranaki and direct in-kind technical support for the duration of the long-term plan. While we continue to work hard on becoming more self-sufficient, we still require the Councils support for the foreseeable future.</p>	The Council has included a financial contribution to Wild for Taranaki in its Long-Term Plan to assist community biodiversity projects including Rotokare Trust.
We encourage the Council to maintain its support for Wild for Taranaki as this exciting initiative finds its feet – we have the upmost respect for the foresight show by Council to step-in to ensure this initiative gained momentum. Now that good progress has been achieved, we hope Council will continue supporting into the future.	

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.



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**43. Taranaki District Health Board**

Doc No. 2034306

The role of the Public Health Unit is to work with other agencies and with the community to improve, promote and protect the health of the public. Health is defined as “a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity” [World Health Organisation 1948]. The physical environment is an important determinant of health. We acknowledge that health of the environment has a special association with personal health for indigenous peoples such as the Māori.

Support for Council programmes and initiatives noted.

We wish therefore to comment on the following proposals contained in the draft plan:

- TRC furthering developing its relationship with Māori, focusing on operational areas
- Commit more resources to freshwater monitoring.

We also wish to offer Taranaki Regional Council the opportunity to utilise the skills and resources of the Public Health Unit to implement a ‘Health in all Policies’ approach to policy development.

Working with iwi and hapu.

The Public Health Unit supports the Council’s proposal to extend the relationship with iwi and hapu into operational areas, particularly relating to resource consents. Māori are strongly connected with the environment through historical, cultural, spiritual, guardianship and food gathering activities. As stated in section 8 of the Resource Management Act 1991 (the Act) “in achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).”

Support noted.

Freshwater quality.

The Public Health Unit supports the Council’s proposal to commit more resources into freshwater monitoring to ensure the central Government’s new freshwater monitoring requirements are met. Freshwater quality is important for physical health and also for the cultural health of Māori:

Support noted.

“The health of the water reflects health of people and is intimately linked with identity”.

Health in All Policies approach – maximizing policy outcomes for the people of Taranaki.

The Public Health Unit has a skilled team that is available to assist the Taranaki Regional Council policy team with incorporating a Health in All Policies approach into policy development. Health in

Offer acknowledged and will be considered on a case by case basis.

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All Policies is an internationally recognised collaborative approach between health and other sectors. It involves a number of tools and approaches to maximise good policy outcomes.

Additionally the Public Health Unit also has a policy analyst available to assist the Regional Council in development of policy and plans and for work such as rapid review of evidence and health impact assessments.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan*.

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<b>44. Friends of Waitara River Inc</b>	Doc No. 2034290
We support the need for a predator free Taranaki from the Waitara Catchment, without the use of 1080.	1080 poison will not be used on farmland for -Towards Predator Free Taranaki.
Does not support Pukeiti/Taranaki Crossing. Monies could be better spent on projects that will benefit the local community – particularly Waitara.	Opposition noted.
We support relationships with Māori (not only treaty settlement entities).	Support noted and part of the Council's approach.
Programme for freshwater monitoring needs to be independently reviewed.	No rationale or purpose for this request is provided. The Council's extensive freshwater monitoring programmes have already been independently reviewed on multiple occasions, both by Council invitation and by direction at national level, including a current review by the Office of the Auditor-General. A further review is unnecessary.
Yes, to funding a regional Enviro-school.	Support noted.
<p><b>Recommendations:</b> That the Taranaki Regional Council:</p> <ol style="list-style-type: none"> <li>1. <u>thanks</u> the submitter for their submission</li> <li>2. <u>makes</u> no change to the 2018/2028 Long-Term Plan.</li> </ol>	

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45. Taranaki Energy Watch

Doc No. 2034336

1. Water quality

(i) In the 2018-2028 Long Term Plan Consultation Document Taranaki Regional Council (TRC) is proposing committing more resources to freshwater monitoring. While Taranaki Energy Watch (TEW) support this commitment of more resourcing we have concerns with the water quality monitoring, results and where these resources might be placed.

Support and concerns noted.

(ii) In the Levels of Service point 1 "Protection of the life-supporting capacity of water, instream uses and values: Measure: Microbiological state of inland waters and coastal waters at bathing sites", TEW would like to support extending the testing of recreational water quality to all 20 water bathing sites to align fully with the MFE guidelines and the reporting protocols for the LAWA website. Currently this does not occur.

The Council's monitoring regime for recreational quality at freshwater and marine sites reflects degrees of community usage and aligns with the MFE guidelines. Weekly monitoring occurs at primary sites, while monitoring at other sites occurs when conditions are suitable for bathing. This is more meaningful and efficient than blanket weekly sampling everywhere.

(iii) In the Levels of Service point 3 states "Maintenance and enhancement of overall water quality in our rivers and lakes, groundwater and coastal waters Measure: Parameters that characterise the physical, bacteriological, biological and chemical quality of surface water."

(a) The Council states "Overall, surface water quality in Taranaki is stable or improving and is generally better than in 1995" and "Trend analysis to June 2015, for both the past 19 and 7 years, has been completed and reported to Council." It is not clear why the Council is referring to the 2015 analysis when they have the trend analysis to June 2016 reported to them in June 2017.

As noted by the submitter, the trend analysis for water quality for the period to June 2016 was completed in June 2017. This was however out of time and hence not available for the recording of baselines in the 2017-2018 annual plan, which in turn were brought forward into the LTP.

(b) The meaningful trend analysis reported to June 2016 shows that there is a deterioration in 26 parameters and improvement in 7 over the period since 1995 and no change in the remainder. 5

The RMA requires the Council to seek the 'maintenance and enhancement' of water quality [Section 7 (f)]. This is therefore the grouping of analysis adopted in Council reports.

(c) It is not clear why bacterial levels of E.coli are not reported on in these environmental monitoring reports as the E.coli data is collected and recorded for each site however no trend analysis is completed.

In freshwater bacteriology, the identifications 'faecal coliforms' and 'E. coli' are equivalent. The E coli data is trended and reported (as faecal coliforms) alongside other water quality data in the Council's annual reports. Staff advise that this equivalence will be clarified in future reports.

2. Air quality

(i) Taranaki Energy Watch (TEW) note that Levels of Service point 7 states "Maintenance of a high standard of ambient air quality". It is not clear how Taranaki Regional Council (TRC) have as a baseline that "between 2008 and 2015, air in the region matched the 'good' or 'excellent' categories of MFE" when there is no consistent environmental reporting on air quality in Taranaki.

The Council undertook extensive and comprehensive air quality investigations between 1991 and 2008. These conclusively show that air quality in Taranaki is of a high standard. In the early 2000s, MfE confirmed that the only area for confirmatory investigations was PM10 (inhalable particulate). This work was undertaken. In the absence of any recent widespread and significant changes in drivers of air quality, the repetition of

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(ii) There are environmental monitoring reports on nitrogen oxides however no other pollutants are routinely monitored and reported on in this format. This is concerning given Taranaki has a number of significant hazardous facilities including oil and gas which all have resource consents to discharge contaminants to air. TEW wish to extend the environmental monitoring reports on air quality for nitrogen oxides to include a range of pollutants including BTEX.

(iii) Both land farming and hydraulic fracturing resource consents have potential impacts on air quality. This is referred to in the Ministry for Environment guidelines. Resource consents for these activities do not have conditions requiring air quality to be monitored and reported on. TEW wish to extend consent conditions to include air quality monitoring of these activities.

intensive surveys across multiple parameters lacks justification.

Given widespread but low-level combustion activities (motor fuels, natural gas-fuelled processes), both site-specific and regional monitoring at a screening level of nitrogen oxides (products of combustion) is ongoing. Localised (compliance) monitoring for a range of other potential contaminants is ongoing and annually reported. A BTEX survey together with site-specific investigation around oil and gas facilities have been undertaken and confirm the absence of justifiable concern.

Miscellaneous emissions from hydraulic fracturing and other activities at hydrocarbon exploration and production sites are already covered by existing air consents. Monitoring at land farms has not found impacts on air quality. Air quality at land farms is monitored and reported in any case during site inspections.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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Comments

46. Taranaki Mounga

Doc No. 2034335

Taranaki Mounga Project (TMP) is an ambitious landscape scale ecological restoration project being delivered through a partnership between Ngā iwi o Taranaki, agencies including the Department of Conservation, the NEXT Foundation, Shell New Zealand, TSB Community Trust, Jasmine Social Investments and the Taranaki community.

Thank you for your supportive submission. The Council values its relationship with the Taranaki Mounga Project and looks forward to working together to achieve collective benefits for the biodiversity and economy of the region.

The investment proposed in the Taranaki Regional Council (TRC or the Council) LTP would take the outcomes we are seeking to another level. This is both in terms of biodiversity outcomes for the region, and the degree of collaboration to achieve a collective outcome. Inclusion in the LTP provides confidence for other new partners in Predator Free New Zealand 2050 (PF2050), additional investment from research agencies like Manaaki Whenua Landcare Research, collective buy in of other local authorities and others to invest in the biodiversity of the Taranaki region.

To this end, TMP commend the Council on its vision, and support the inclusion of the following projects in it's LTP:

Biodiversity

The Council has demonstrated significant leadership and taken ownership of the work required to protect Mounga Taranaki from re-invasion of pests and predators from the ring plain. TMP is fully supportive of projects included in this LTP ramping up biodiversity protection towards a predator free Taranaki. Specifically:

- Investment in an initial three-year spending programme targeting the Waiwhakaiho catchment trial, along with a new trial aimed at completely eliminating possums in a 5,000 hectare area west of the mountain including public conservation land and private land and covering rural and built-up zones. A separate programme is also proposed to reduce predator numbers on 70,000 hectares of land in and around Mt Taranaki;
- Continued investment in Wild for Taranaki and the Regional Biodiversity Fund;
- The TRC Key Native Ecosystem Programme (KNE), including the creation of new KNE, in particular those adjoining or supporting the TMP project area; and
- Investment in the Taranaki Regional Pest Management Strategy, and Taranaki Regional Pest Management Plan processes and delivery.

Community Engagement

TRC has a magnificent track record working with the Taranaki community on our biodiversity and biosecurity issues. If TMP is to be successful, the

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expertise of the Council in landowner engagement will be critical. In that regard TMP is supportive of continued investment in advocacy and community engagement roles and functions included in this LTP.

**Education**

The TRC education programme is well respected within the region. This programme includes an education resource that provides an opportunity for Taranaki youth to visit, learn and experience the Mounga. TMP is supportive of the continued investment in programmes such as this, as well extending educational outreach by funding a regional position for the Enviro-Schools organisation in the LTP.

Support noted.

Thank you for the opportunity to comment on this proposed LTP. We are looking forward to implementing the projects listed in this document alongside the Council and others to success.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan*.

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**Comments**

**47. Mr Hasely Lobb, NP Mountain Bikers Club**

Doc No. 2034331

Support for Pukeiti/Taranaki Crossing.

Support for the Pukeiti/Taranaki Crossing project is noted.

The New Plymouth Mountain Bikers Club (725 members in 2017) support the construction of trails open to mountain bikes within and around Pukeiti. We also support the development of shared MTB/walking trails around Taranaki.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the *2018/2028 Long-Term Plan*.



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48. Te Korowai o Ngāruahine Trust

Doc No. 2034328

1. On behalf of Te Korowai o Ngāruahine Trust (TKONT) thank you for the opportunity to provide a submission on the Long Term Plan 2018-2028. TKONT would first like to acknowledge the Regional Council for a thorough and comprehensive Plan. We would also like to acknowledge the Regional Council staff with whom we work on a broad range of Kaupapa. The relationship that we have continues to go from strength to strength. We have reviewed the Draft Plan and in this submission set out a number of comments for your consideration.

Strong and growing relationship also acknowledged

2. TKONT's interest in the Plan stems from Ngāruahine iwi having a special cultural, spiritual, historical and traditional association with the whenua upon which the activities take place. TKONT, as the post-settlement governance entity for Ngāruahine has a responsibility to ensure that the interests of Ngāruahine are safe-guarded. This includes considering the extent to which the proposed activities, may impact (potential or actual) on the environmental, cultural and spiritual interests of Ngāruahine within its rohe (tribal area); and those areas under statutory acknowledgement and/or Deed of Recognition (Ngāruahine Claims Settlement Act 2016); and the potential or actual risks to the physical, psychological, cultural and spiritual wellness of Ngāruahine (Te Korowai o Ngāruahine Trust Deed). Therefore, TKONT makes submissions to any relevant policy matters within its rohe. This does not prevent the Ngāruahine hapū submitting on their behalf, nor should it be in any way viewed as compromising the mana motuhake of the hapū.

3. It is heartening to see the partnership with Māori as one of the cornerstone projects that the Regional Council is focussed towards. There are many similarities with the areas of focus and priority between iwi with the Regional Council, and it is the firm belief of TKONT that we can only achieve the regional goals that we all aspire to by working together.

Māori resource management commissioners

The Council uses commissioners with appropriate Māori skills when submissions to hearing committees require this. The trend is for the Council to appoint independent hearing commissioners for hearings going forward so the need for Council commissioner training less important.

Update on tikanga training at the Council

Training is available and has been undertaken.

Lack of fish passes on unused (orphaned) instream structures (Eltham Weir)

Have a project underway but progress is slow.

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Access to data on the (partic. monitoring data) and improved file naming conventions	IT and science officers are jointly working towards the online publication of compliance monitoring data, amongst other IRIS projects. In the meantime, the Council publishes abstraction data at consent (annually) and catchment (5-yearly) scale.
Predator Control	Support noted for the extension of the predator programme beyond the initial 3 years. The Council supports the broad concept of "Towards a Predator Free Taranaki", however this has never been attempted at this scale before and so is adopting a trial by management and one step at a time approach to rolling this programme out across the region. The programme is also heavily reliant on external funding contributions to be successful. The Council has other long running programmes that target pests and protect our regions biodiversity, the focus of these is working directly with landowners including iwi to provide assistance to protect special areas on their land. We would welcome the opportunity to discuss opportunities to work with Te Korowai o Ngāruahine Trust on pest control and biodiversity initiatives.
Freshwater Quality	The acknowledgement of Council support for training of iwi in water quality monitoring is noted. Provision of 'citizen science' to enable meaningful local delivery of monitoring is being promoted. The Council is committed to developing mātauranga Māori monitoring protocols and methods further, as obliged under the NPS-FM. It looks forward to evaluating and implementing appropriate measures of cultural health in conjunction with the iwi of Taranaki. The Council notes that while there are 13 sites used for monitoring physicochemical parameters of water quality, there are approximately 60 sites used for monitoring stream health. Reviews of Council network indicate it is appropriate for NPS purposes.
Freshwater levels of service	The submission asks a series of questions seeking information on environmental quality and policies, the answers to which are available in Council reports rather than within the LTP process. Officers will address these separately.
Education	Support for the Council's education programme is noted and appreciated. The Council is generally supportive of the submitter's proposal to develop and incorporate an Iwi based understanding of the environment into the education programme. The joint mātauranga Māori monitoring project will allow the Māori world view to be considered with western science in a partnership approach as requested.
Iwi Committee Representatives	Support for representatives noted and need to get agendas out earlier acknowledged and will be addressed.

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**Comments**

Resource consent processes applications should be submitted together and not piecemeal. Align district and regional council consent processes.

Bundling of applications and joint council consent processes will be encouraged.

Working with iwi on consents and plans needs to go further and be more certain

Building on existing relationship and formalising these in a Mana Whakahono a Rohe relationship agreement should provide appropriate mechanisms for iwi input and appropriate partnerships for water management in the region. The development of the relationship will be appropriately acknowledged in the LTP under description of resource management activities.

Resource Management and iwi world view partnership

The mātauranga Māori monitoring project will allow the Māori world view to be considered with western science in a partnership approach as requested. This important project will be appropriately acknowledged in the LTP under description of resource management activities.

Recognition Council is moving in the right direction

Positive working relationship with Trust acknowledged.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes the one change to the *2018/2028 Long-Term Plan* as noted above.

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<p><b>49. Mr Ritchie Dahm</b></p> <p>Does not support predator-free Taranaki.</p> <p>Supports Pukeiti/Taranaki Crossing.</p> <p>My submission is a request that the TRC stop allowing the burning of plastic baleage wrap in rural Taranaki. The rationale to burn archaic*. The plastic needs to go to the recycling stream. Plasback operates their pickup and recycle scheme province wide at the same price for all.</p> <p>Burning plastic releases dangerous toxins into the environment.** The 1956 Health Act stipulates, promotion of health and well-being of the WHOLE community. The Local Government Act 2002 (as pertains to section 51 of the Waste Minimisation Act 2008) directs that the environment and public health is adequately protected.</p> <p>*see TRC Long Term Plan, Section 3, Rule 33, Page 50 **see Ontario Agricultural Waste Study: Environmental Impacts Of Open-Burning Agricultural Plastics: Final Report; July 2011:</p>	<p>Doc No. 2034559</p> <p>Noted.</p> <p>Noted.</p> <p>The Council advises farmers that it is good practice to recycle hay and silage wraps and other plastics, and actively supports and promotes the opportunities to do so. Through the <i>Regional Air Quality Plan</i>, which reflects community views as expressed at the time of development, hay and silage wraps can be burned only under strict conditions. The scientific evidence sighted by the Council shows that there are some types of plastic, but certainly not all, that can be burned cleanly on a roaring fire (e.g., an untreated wood fire) without adverse environmental impacts within rural areas. Silage/bale wrap is one such plastic that is acceptable.</p> <p>The appropriate channel for consideration of this matter is for the submitter to seek a plan change to the <i>Regional Air Quality Plan</i>. The LTP does not regular emissions to air.</p>
	<p><b>Recommendations:</b></p> <p>That the Taranaki Regional Council:</p> <ol style="list-style-type: none"> <li>1. <u>thanks</u> the submitter for their submission</li> <li>2. <u>makes</u> no change to the 2018/2028 Long-Term Plan.</li> </ol>

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Comments

50. Te Kotahitanga o Te Atiawa

Doc No. 2034340

On behalf of Te Kotahitanga o Te Atiawa Trust (the Trust) and Hapu of Te Atiawa Iwi (Hapu) we appreciate the opportunity to provide comment on Taranaki Regional Council's (TRC) 2018/2028 Long-Term Plan (LTP).

The Te Atiawa Iwi Claims Settlement Act 2016 recognises the Te Atiawa rohe which extends from Te Rau o Te Huia along the coast to the Herekawe Stream, inland to Tahuna Tutawa, east to Whakangerengere, northeast to Taramoukou, north back to Te Rau o te Huia and offshore out to 12 nautical miles. Te Atiawa has occupied this rohe for well over a millennium. This area of interest encompasses the Coastal Marine Area, part of Maunga Taranaki and overlaps with rohe of five whanaunga iwi including Ngāti Mutunga (north-east), Ngāti Maru (east), Ngāti Ruanui (south), Ngāruahine (south) and Taranaki (west). Given this, the Trust and Hapū respond to any relevant proposals, resource consent applications and policies within, adjacent to, or impacting directly on this area of interest.

Ramping up biodiversity protection – Towards a predator-free Taranaki

Support noted and the Council looks forward to further discussions with Te Kotahitanga o Te Atiawa Trust on this exciting project.

Key native ecosystems and biodiversity plans

Support for the Council's Key Native Ecosystem programme is noted.

Extending our existing programmes – Freshwater quality monitoring

Support for the Council's resourcing of freshwater monitoring is noted. The Council notes that while there are 13 sites used for monitoring physicochemical parameters of water quality, there are approximately 60 sites used for monitoring stream health. Reviews of Council network indicate it is appropriate for NPS purposes.

Extending existing programmes – Education

Support for the extended education programme noted.

Some matters in the working together with Māori section supported. Those that were not were:

Greater iwi involvement in the resource consent process.

Build on existing relationship and formalising this is in a Mana Whakahono a Rohe (MWAR) relationship agreement should formally provide appropriate mechanisms for iwi input to consents and policy, and appropriate partnerships for water management in the region. The development of a MWAR relationship agreement will be appropriately acknowledged in the LTP under description of resource management activities.

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Iwi are more than an “interested party” in the consent process	Support change and recognising iwi as “interested/affected” party to the consent process recognises the two roles iwi may have.
Provide for participation of iwi in resource consent monitoring	This is a matter to be discussed as part of the MWAR process.
Limitations to communication between iwi representatives on committees and 8 iwi. Needs to be 10 days.	Extension of agenda timeframe supported and measures to extend this beyond the legally required 2 days being implemented.
Require an annual review of the effectiveness of TRC’s policies and co-designed MWAR	Review provisions can be considered when a MWAR is negotiated.
Require the Council to integrate Te Ao Māori perspective/Māori world view, Māori cultural values and Mātauranga Māori monitoring techniques (e.g., Cultural Health Index) into the monitoring framework and encourage TRC to invest funds in this. This will provide a strong foundation for this framework and its operation, and will provide long-lasting cultural integrity.	Mātauranga Māori monitoring project with iwi is proposed. This important project will be appropriately acknowledged in the LTP under description of resource management activities. Decisions on funding iwi input have not been made. The Council already recognises aspects of Te Ao Māori within planning documents.
Require Mātauranga Māori parameters to be included as a level of service.	Firstly, need to develop the parameters as part of the Mātauranga Māori monitoring project before considering inclusion in the LTP.
	The submitter’s acknowledgement of current Council support for training of iwi in water quality monitoring is noted. Provision of ‘citizen science’ to enable meaningful local delivery of monitoring is being explored by officers. The Council is committed to developing Mātauranga Māori monitoring protocols and methods further, as obliged under the NPS-FM. It looks forward to evaluating and implementing appropriate measures of cultural health in conjunction with the iwi of Taranaki.
	<p><b>Recommendations:</b></p> <p>That the Taranaki Regional Council:</p> <ol style="list-style-type: none"> <li>1. <u>thanks</u> the submitter for their submission</li> <li>2. <u>makes</u> the three changes noted above to the <i>2018/2028 Long-Term Plan</i>.</li> </ol>

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<p><b>51. Mrs Judith Hill</b></p> <p>Does not support Pukeiti/Taranaki Crossing.</p> <p>Mountain biking is not a suitable activity in the national park. Too destructive of habitat. Project far too expensive. Money better spent maintaining existing tracks to suitable state.</p>	<p>Doc No. 2034574</p> <p>This project is not within the National Park it is along a New Plymouth District Council paper road.</p> <p><b>Recommendations:</b> That the Taranaki Regional Council:</p> <ol style="list-style-type: none"><li>1. <u>thanks</u> the submitter for their submission</li><li>2. <u>makes</u> no change to the <i>2018/2028 Long-Term Plan</i>.</li></ol>

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Comments

52. Taranaki Stadium Trust

Doc No. 2035003

Thank you for the opportunity to comment and provide a submission on the Council's Consultation Document and supporting documentation for the 2018/2028 Long-Term Plan.

The Trust is a 100% council controlled organisation. It owns the Yarrow Stadium assets. The assets are managed and operated by the New Plymouth District Council under a management agreement with the Trust. The Council provides annual funding (\$876,000 p.a. to date) for the long-term maintenance and development of Yarrow Stadium.

In 2017, the Trust and the Council commenced discussions to increase the annual funding for Trust from \$876,000 p.a. to \$1.25m p.a. This was to allow for the full range of projects in the 2018/2028 Yarrow Stadium asset management plans to be funded. These discussions stopped once the preliminary results of a seismic assessment of the East Stand indicated that the Stand was approximately 10% of new building standard. This assessment has rendered the stand unusable.

There are two main programmes of work going forward. The first is a recovery plan to get the Stadium operational for the full range of users and, in particular, for the hosting of rugby games for the 2018 National Provincial Championship. The second programme of work is the fixing of the problems identified in the seismic assessment of the East Stand. This submission focuses on the first programme of work namely, the recovery programme.

The Council has considered and approved a recovery programme. The funding of the recovery programme has been agreed from the following sources:

- the balance of the 2017/2018 Council funding to the Trust
- the balance of the 2018/2019 Council funding after the payment of unavoidable costs (interest, insurance, audit fees etc)
- 50:50 split between the New Plymouth District Council and the Taranaki Regional Council (via the Taranaki Stadium Trust) for the remaining portion of the recovery plan.

To address the Taranaki Regional Council's share of the funding identified in the last bullet point above, the Trust recommends that the Council consider increasing its funding for Yarrow Stadium to the \$1.25m level discussed in 2017. Further, the Trust recommends that the funding policies identified in the Council's Revenue and Financing Policy be applied for this increased level of funding. This

The Council and the NPDC are working on a recovery plan to get Yarrow Stadium operational until the earthquake issues identified in the East Stand are resolved. The funding of the recovery plan is as noted by the Trust. The funding of the TRC's share of the 50:50 split for the remaining portion of the recovery plan could be funded in a number of ways. These options include:

Option 1: The Council could fund their share from accumulated retained earnings. That is, the Council can use its accumulated general reserves and not seek to recover the money from any other sources. This will reduce the level of interest earned on Council investments, but otherwise there will be no further impact on ratepayers. Lost interest will be approximately \$3,000 per \$100,000 of funding to the recovery programme.

Option 2: The Council could fund their share from increasing the level of annual funding for the Trust. The submitter has suggested increasing the funding from \$876,000 pa to \$1.25m pa. At this level, the increased funding could take more than one year to full fund. Should the Council increase the funding from \$876,000 to \$1.25m and continue to apply the current *Revenue and Financing Policy*, then the funding would need to move from \$11 of the UAGC in the Stratford and South Taranaki constituencies to \$15 of the UAGC. In the New Plymouth and North Taranaki constituencies, the proportion of the UAGC going to Yarrow Stadium would also increase from \$11 to \$15. In addition, the land value targeted rate in the New Plymouth and North Taranaki constituencies would have the following movements:

- industrial and commercial - up \$67,000 to \$213,000
- residential - up \$85,000 to \$220,000
- farmland - up \$8,000 to \$21,000
- small holdings - up \$4,900 to \$12,500

The average non-commercial/industrial ratepayer will increase from \$20 p.a. for Yarrow Stadium to an average of \$26 to \$27 per property.

Option 3: The Council could fund their share as part of the full solution for the repair of the East Stand. In this option, the Council would fund their share of the residual recovery plan from accumulated funds and look to seek recovery of this funding as part of the total budget for the repair of the East Stand. This option has a similar loss of interest revenue as identified in Option 1 above. Further, it could be between two and four years before the Council was able to recovery this funding.



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Policy applies a rating model that recovers 78% of the funding from the New Plymouth and North Taranaki constituencies, 5% of the funding from the Stratford constituency and 17% of the funding from the South Taranaki constituency. The current funding model is a portion of the UAGC for all ratepayers at \$11. A land value based differential targeted rate over the New Plymouth and North Taranaki constituencies is used to increase the level of funding to the 78% identified above. In these two constituencies, commercial and industrial ratepayers pay the equivalent of \$100 per property and all other ratepayers pay the equivalent of \$20 per property.

The Trust does not wish to be heard in support of this submission.

**Comments**

Without unnecessarily increasing rates and with the need to proceed with implementing the recovery plan, Option 1 is recommended for adoption. This will allow the focus to move from the recovery plan to the reinstatement of the East Stand project.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. selects Option 1 for funding the Council's residual share of the Yarrow Stadium recovery plan
3. makes no other change to the *2018/2028 Long-Term Plan*.

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<p><b>53. Eltham/Kaponga Community Board</b></p> <p>We would like to make a submission for the construction of a walkway from the Kaponga Township to Hollards Gardens.</p> <p>As you will see in the supporting proposal, this has strong support from the Kaponga community. It has been on their 'wish list' for a number of years.</p> <p>With the Regional Council's interest in Hollards Gardens we feel this is a unique opportunity to further promote and develop community involvement in your ongoing work and programmes. To quote part of your mission statement for Recreation, Culture and Heritage; 'ensure that Tupare, Hollard Gardens and Pukeiti are maintained as regionally significant recreational and heritage amenities'.</p>	<p>Doc No. 2035052 &amp; 2035057</p> <p>The TRC is supportive of such initiatives to provide improved pathways for residents and visitors alike, and also of improving access to Hollard Gardens.</p> <p>The Council's <i>Regional Land Transport Plan for Taranaki 2015/16-2020/21</i> strongly supports providing safe walking/cycling infrastructure, and promoting such active modes of transport that increase opportunities for physical activity and social interaction. The provision of such off-road pathways greatly assists with minimising conflicts between different traffic types and enhances public health and safety. We would suggest that this proposal is likely to gain wider support as a 'shared pathway' (rather than purely 'walkway') that is suitable for cyclists and physically impaired users also.</p> <p>This initiative is also well aligned with the Council's <i>Regional Walkways and Cycleways Strategy for Taranaki</i>, which has the vision "To provide greater transport choice and opportunities for people to discover and enjoy Taranaki's unique environment through walking and cycling." It is noted that Sport Taranaki, with support from the Walking Access Commission, is currently undertaking work on Tracks and Trails within the region, which this project could potentially link into.</p> <p>It would be for the South Taranaki and Stratford district councils to assist with provision of such infrastructure within their respective districts. This proposed project would seem to fit well with STDC's Pathways for People work in particular.</p> <p><b>Recommendations:</b> That the Taranaki Regional Council:</p> <ol style="list-style-type: none"> <li>1. <u>thanks</u> the submitter for their submission</li> <li>2. <u>makes</u> no change to the <i>2018/2028 Long-Term Plan</i>.</li> </ol>

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54. Pukeiti Rhododendron Trust

Doc No. 2038792

The Pukeiti Rhododendron Trust supports the 2018-2028 Long Term Plan as it relates to Pukeiti, particularly bullet point two on page 7.

The Trust appreciates that these proposals will continue to position Pukeiti as a world class rhododendron garden and rainforest experience and to ensure Pukeiti remains a Rhododendron collection and conservation hub.

That the PRT and TRC work together where practicable on implementing relevant recommendation from the PRT Ex-situ Rhododendron Conservation Strategy

On behalf of the Trust I wish to thank the TRC for its continued support and commitment to the founding principles towards the Pukeiti garden.

The Council acknowledges and appreciates the Pukeiti Rhododendron Trust's continued support and involvement in Pukeiti and agrees that the rhododendron collection is critical to the continued development of Pukeiti and that both parties continue to work proactively together in areas of common interest.

The Council appreciates the continued financial support with operations and projects.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.

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**55 Taranaki Regional Council**

Pursuant to section 83 of the Local Government Act 2002, the Council is undertaking a special consultative procedure on its 2018/2028 Long-Term Plan. The consideration of submissions on the 2018/2028 Long-Term Plan Consultation Document allows the Council to make changes to the supporting documentation used to prepare the 2018/2028 Long-Term Plan. This particular submission deals with the issues that have arisen since the 2018/2028 Long-Term Plan Consultation Document was adopted.

Estimates

There has been a number of staffing changes and minor estimates changes during the last three months. In particular, there has been additional clarity on the level and timing of central Government funding for the biodiversity/predator control programme. As this funding is spent as it received, it is fiscally neutral for the Council's budgets.

The estimates have been updated to reflect these changes. There is no effect on the level of general rates proposed for 2018/2019.

Editorial changes

There are a few minor typos and editorial changes required to finalise the Plan. None of these are significant or have financial implications. A number of the changes are necessary as a result of the recommendations contained in this and the other submissions. There are also likely to be minor editorial changes resulting from the audit process. Therefore, it is recommended that the Chief Executive be delegated the authority to make the necessary editorial changes.

**Recommendations:**

That the Taranaki Regional Council:

1. thanks the submitter for their submission
2. makes no change to the 2018/2028 Long-Term Plan.