

Our reference: A910893
Enquiries: Lucy Hicks
Email: lucy.hicks@es.govt.nz



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Hamish Duff
Performance Auditor – Sector Performance
Office of the Auditor-General Te Mana Arotake
PO Box 3928
Wellington 6011

By Email: Hamish.Duff@oag.parliament.nz

Dear Hamish

Thank you for your letter of 5 April 2023 to Wilma Falconer, who has asked me to reply on her behalf. Your enquiry about how we – along with Waikato, Taranaki and Horizons Regional Councils – have made use of four out of five of the recommendations in the audit, *Managing freshwater quality: Challenges and opportunities*, conducted in 2019. Below are the actions that Environment Southland has taken in relation to the four recommendations.

Recommendation 1:

The Ministry for the Environment and Statistics New Zealand lead work with regional councils and relevant land and freshwater management agencies to support better-informed and co-ordinated management of freshwater by preparing a consistent approach to monitoring, analysis, and reporting of freshwater quality state and trend information

Environment Southland continue to work closely with the Ministry for the Environment and Statistics New Zealand on the management of freshwater. Examples of this include our collective work on Intensive Winter Grazing regulations, participating on the Freshwater Farm Plan pilot and our information is up to date on LAWA, including the additional modules added since 2011.

Recommendation 2:

Waikato Regional Council, Taranaki Regional Council, Horizons Regional Council, and Environment Southland consider how they might use the analysis conducted by National Institute of Water and Atmospheric Research Limited to improve their monitoring of freshwater quality.

Below are some NIWA recommendations and how Environment Southland has considered them:

NIWA recommended that we consider lowering detection levels for some variables, notably DRP and Ammoniacal-N, because high detection limits will mask trends in high-quality water bodies.

At this time we have not implemented this, however, it is something we will look to include in the next LTP as part of the review of our monitoring networks to ensure compliance with the NSP-FM 2020.

NIWA recommended that Councils should consider tightening up on hydrometric infrastructure under-pinning water quality monitoring, for example, by establishing quantified relationships between flow at sampling sites and flow gauging stations.

We have installed 9 additional, permanent flow-gauging stations and 17 temporary sites to improve the hydrological correlation between unrated water quality sites and flow gauging stations. There have also been 2,885 spot gauging at freshwater quality sites to help establish flow relationships with continuous flow sites. In addition, we are in the process of installing new technology (Space Time Image Velocimetry) at flow gauging stations to improve the quality of rating curves. Specifically, this technology allows us to capture high flow data which is sometime not possible to obtain using conventional methods due to sites becoming cut-off during floods. <https://www.es.govt.nz/about-us/news?item=id:2llefmbuc17q9sn688b4>

Recommendation 3:

Waikato Regional Council, Taranaki Regional Council, Horizons Regional Council, and Environment Southland support and inform wider community discussion of freshwater quality issues by ensuring that the information they make available to their communities is clear, complete, up to date, consistent, accessible, and readily understandable.

Since the audit, we have established a website that holds a myriad of information for our community <https://waterandland.es.govt.nz/>. There is information here that includes:

- The establishment of a Regional Forum of representatives from across the region, to provide advice to the Council and iwi partners and engaged with the community on freshwater topics;
- A values-gathering exercise to seek community views on aspects of freshwater that are important to them. This resulted in a set of combined (iwi and community) draft values and freshwater objectives.
- Nutrient, sediment and *E. coli* load reduction modelling and peer review, which are available here: <https://waterandland.es.govt.nz/science-and-economics/science-modelling>. The release of this information was supported by a series of public and focus group presentations to share this information with our communities;
- A science report portal makes documents much easier to find: <https://esgis.maps.arcgis.com/apps/instant/filtergallery/index.html?appid=91ef31b7a79f4527b550992a42a197af&sortField=title&sortOrder=desc>
- We continue to keep our information up to date and available via <https://www.lawa.org.nz/>

Finally, we have an ongoing work programme to engage our communities in discussions about freshwater and providing accurate and easily understandable information is key to this. Our Catchment Integration teams continue to support catchment groups and others with in-stream activities and presentations based on science.

Recommendation 5:

Waikato Regional Council, Taranaki Regional Council, Horizons Regional Council, and Environment Southland use a full range of appropriate compliance, monitoring, and enforcement tools to effectively identify and act on material non-compliance with the Resource Management Act 1991 or resource consent conditions.

Over the last 12 months, Council has increased our compliance, monitoring and enforcement resources. We continue to identify, monitor and enforce matters raised with council. The increased

resourcing has enabled more capacity to work with the community on these matters. Our Annual Compliance Monitoring Report and we also contribute to the Regional Sector CME reports. Both are available on our website¹.

We are currently developing a range of policy and solutions to implementation issues via an integrated catchment approach and through our Plan Change Tuatahi process. Plan Change Tuatahi is one of the tools we will use to implement the necessary actions to address our freshwater management challenges and meet the NPS-FM 2020 requirements. In addition, a suite of non-regulatory interventions, such as action plans, will be developed alongside the Plan Change and be fully considered as part of our Long-Term Planning process.

For both Plan Change Tuatahi and the Long-Term Plan process, the improvements we are seeking will be thoroughly discussed with the public, our current consent holders, other customers and stakeholders.

Yours sincerely

A handwritten signature in black ink that reads "Lucy Hicks". The signature is written in a cursive, flowing style with a long, sweeping underline that extends to the right.

Lucy Hicks
General Manager, Policy & Government Reform

¹ <https://www.es.govt.nz/environment/compliance/compliance-monitoring-reports>
<https://www.es.govt.nz/environment/compliance/regional-sector-cme-reports>