greater WELLINGTON
THE REGIONAL COUNCIL

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Greater Wellington is the promotional name of the Wellington Regional Council

Charlotte Rutherford
Fonterra Shareholder Services
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Dear Charlotte

Comments on Fonterra's proposed Environmental Assessment Procedure

Thank you for inviting us to comment on Fonterra's proposed Environmental Assessment Procedure. Greater Wellington – The Regional Council, through its policy documents the Regional Policy Statement and the Regional Freshwater Plan, supports industry initiatives that promote best environmental practice.

The attached comments were prepared by the River Ecosystems Group, which is comprised of staff from the Environment, Landcare, and Operations divisions of Greater Wellington. I have also included some information about the level of nutrients in the Ruamahanga River. Our data indicate that "non-point" source discharges account for the lion's share of the nutrient load in the river.

I discussed Fonterra's proposal and our comments with Councillor Ian Buchanan, Chair of Greater Wellington's Environment Committee. He is happy to come and talk to the next Fonterra Shareholders' meeting in the Wairarapa about the importance of this initiative in the overall water quality scene. You can call him on 06 378 7261 if you would like him to do this.

Regards

Kirsten Forsyth
Policy Advisor

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Encl: Table of comments from Greater Wellington
Nutrient load on the Ruamahanga River

Fonterra's Environment Assessment Proposal, comments from Greater Wellington – The Regional Council

Reference Number & Policy Area	Change sought	Reasons
1. Method of Assessment	No changes sought	This is not a resource management issue.
2. Residues	No changes sought	This is an industry decision. Our information about the location and degree of contamination of land is largely limited to sites with a history of storing, using or manufacturing hazardous substances; sites where a major spill or other incident involving hazardous substances has occurred; and sites where analysis of soil or water samples has confirmed that it is a contaminated site. Landowners can request this information but it not publicly available.
3. Human waste	No changes sought	This is an industry decision not a resource management issue. We note that the critical status does not depend on any withholding period for stock, nor does it differentiate between products of human waste, such as biosolids, and untreated human waste, such as leaks from on-site sewage systems. Rule 6 of our Regional Plan for Discharges to Land allows some human sewage effluent to be discharged **onto** land provided a comprehensive set of conditions is met, including preventing stock from entering the disposal area for a period of at least six months following the last application of effluent. There is also one discharge permit for the region-wide discharge of biosolids.
4. Farm dairy effluent	Support all ratings except Change "resource consent pending" in 4d to "resource consent pending and applied for before expiry of existing consent".	The "minor" rating for 4d should only be possible if a consent holder's application was lodged before their existing consent expired. Like other regional councils, we inform all consent holders six months before their consents are due to expire and encourage them to apply for new consents then. There should be very few occasions where a dairy farmer is in the position of waiting for a consent. No one should be carrying out a new activity that requires a consent, before they obtain a consent. This

		should be included in 4a and classed as "critical".
5. Fertiliser usage	No changes sought	Greater Wellington has adopted a non-regulatory approach to activities where effects can be addressed by adherence to codes of practice and industry guidelines. Because of this, any discharge of inorganic fertiliser (such as superphosphate or urea) is a Permitted Activity in the Wellington Region. We are committed to reviewing this classification in 2003 if our studies indicate that fertiliser is causing adverse effects on groundwater, particularly nitrate levels in groundwater. Phosphorus (as Olsen P) in soil was measured in 28 locations around the Region as part of the Council's participation in the national 500 soils programme. Results for two of the four dairy farms showed that Olsen P levels are exceptionally high (>120 $\mu g/cm^3$), indicating that fertiliser is being applied to those farms at levels far higher than pasture requirements. If phosphorus rich soils are eroded and end up in waterways they can promote undesirable algae growths. Rating 5a as "major" will help avoid adverse effects on the environment caused by unnecessarily high fertiliser applications, and should mean that continuing a non-regulatory approach will be the most efficient and effective way of controlling fertiliser use.
6. Stock access to waterways	No changes sought	Stock access to waterways can cause significant adverse effects on water quality and aquatic habitat and is one of the biggest resource management issues associated with dairy farming. The high rating reflects this significance, but 6b could perhaps be graduated according to the percentage of the overall length of on-farm streams with stock access. Where stock have limited or controlled access for drinking but do not enter the waterway or trample the banks, the effects on water quality and aquatic habitat are less significant. Such activities can sometimes be acceptable although we understand that most dairy farmers have separate clean water supplies for their

		stock and don't need access for drinking.
7. Stock crossings	No changes sought	We have evidence that daily river crossing by herds is causing significant adverse effects on aquatic habitat in many rivers and streams in the Region. Our existing non-regulatory approach will be reviewed when we next review our plans. A proactive approach by industry can help avoid the need to change the rules.
8. Stock access to wetlands	No changes sought	Our Regional Freshwater Plan has listed 17 wetlands as having a high degree of natural character, and the wetland margins of Lake Wairarapa are protected by a Water Conservation Order. Despite this, most of the wetlands are affected by stock access. Our existing non-regulatory approach will be reviewed when we next review our plans. A proactive approach by industry can help avoid the need to change the rules.
9. Physical, health and behavioural needs	No changes sought	This is not a resource management issue.
10. Tail docking	No changes sought	This is not a resource management issue.
11. Inductions	No changes sought	This is not a resource management issue.
12. Bobby calves	No changes sought	This is not a resource management issue.
13. Collection of casualty cattle	No changes sought	This is not a resource management issue.
14. Farm rating	No changes sought	The resource management issue of greatest concern to Greater Wellington is that adverse effects on water bodies are avoided or mitigated. Of the matters covered by the Environmental Assessment Proposal, this means that the management of farm dairy effluent and fertiliser use, and stock access to waterways and wetlands are the matters requiring the most urgent attention. We therefore support the rating of either "critical" or "major" for breaches in these matters that has been suggested in the EAP.

15. Timetable for compliance	No changes sought	The timeframe for compliance (1 June 2006) for "major" breaches recognises the difficulty farmers may have achieving the A or B rating if they have more than one major breach. It also gives them an incentive to act now on the matters they can improve (such as collection points for dead stock) to get the number of major breaches down to one. It is likely that addressing the major resource management issues (such as stock access to waterways) will take longer than the major non resource management issues (such as setting up a collection point for bobby calves). Our own policies and strategies recognise that these things take time and Greater Wellington is committed to helping all farmers with practical advice and offering financial help to landowners with streams in catchments that have high value as aquatic ecosystems.
16. Remedial action	No changes sought	
17. Goal	No changes sought	

Nutrient load on the Ruamahanga River

Figures 1 and 2 show nitrogen and phosphorus loads on the Ruamahanga River and some of its tributaries. These loads originate from land use and major point source discharges. The loads have been calculated from state of the environment and compliance monitoring data and mean annual river flows. There are limited data available so these cannot be viewed as definitive but they show the relative contributions of non-point and point source nutrients within the Ruamahanga River system.

The graphs show the increasing amount of nitrogen and phosphorus carried by the river as it flows downstream. They also show that inputs from the Makoura Stream, the receiving water for the discharge from Masterton's Wastewater Treatment Plant (WTP), and the Papawai Stream, which receives Greytown's WTP, are only partly responsible for this increase. This means that reducing the total load will require a reduction in all inputs, not just direct discharges. Two nutrient sources likely to be affecting the overall load are inputs from stock with access to waterways and runoff from fertiliser applications that are not based on an on-farm nutrient budget.

Distances from the source of flow (head waters) are shown in brackets. The loads to the Ruamahanga River and to its tributaries vary by an order of magnitude so the minor inputs cannot be seen easily. Despite this, a logarithmic scale was not used because it can give an impression of similarity between sites. Using linear scales clearly shows the magnitude of difference as the river flows from the source through farmland to the sea.

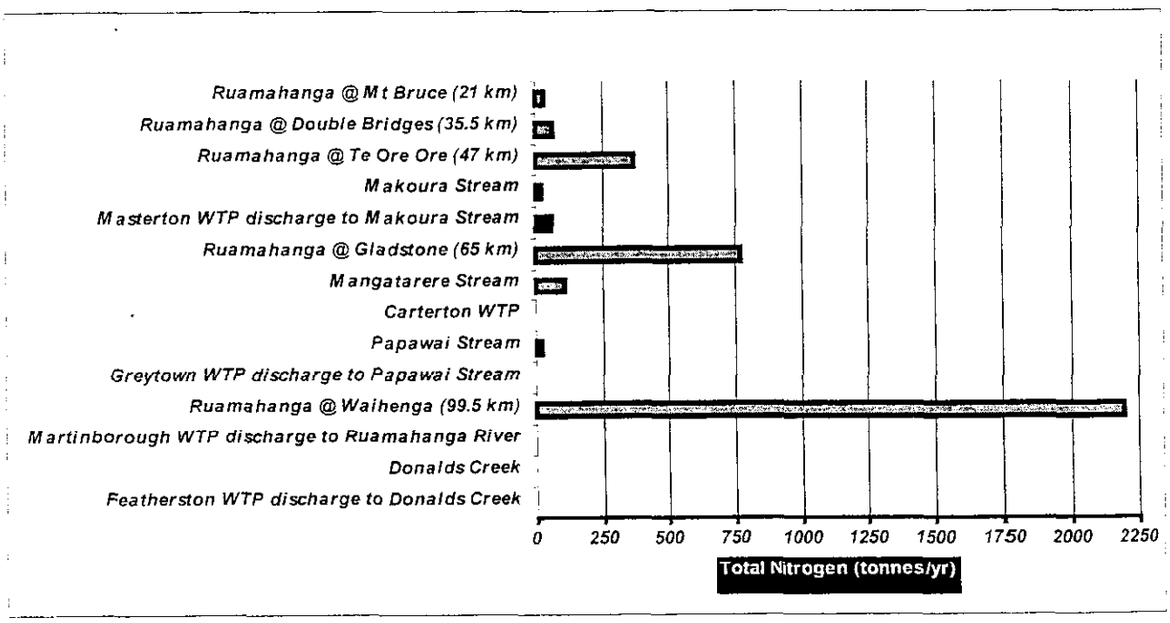

Figure 1 Total Nitrogen load to the Ruamahanga River, mountains to the sea

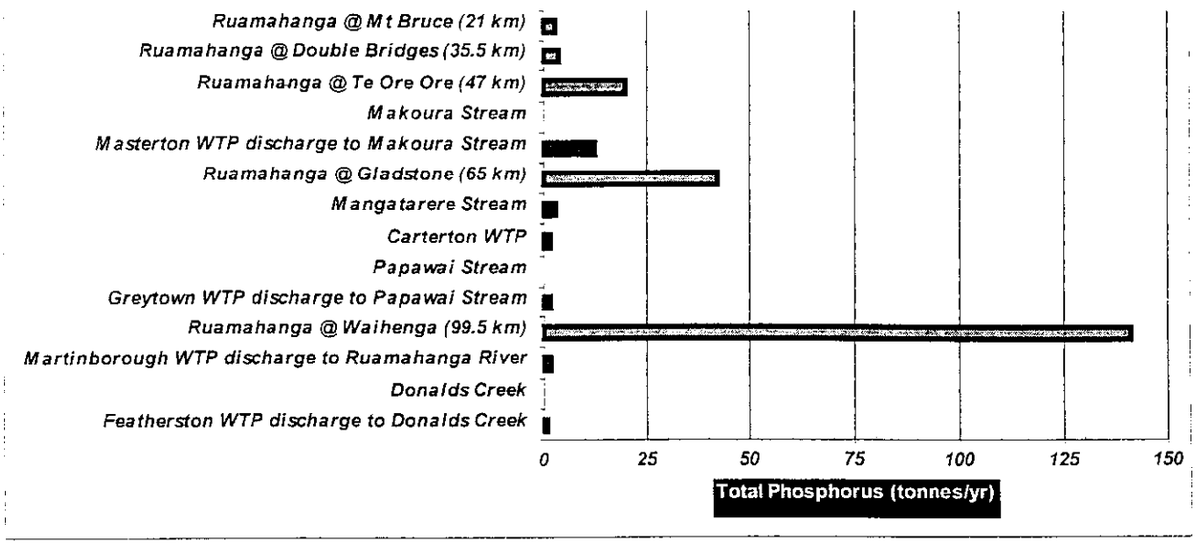

Figure 2 Total Phosphorus load to the Ruamahanga River, mountains to the sea

Notes. *1. Results of Ruamahanga River nutrient loads (mean concentrations) derived from sampling period (monthly interval) from July 2001 - September 2002.*
2. STP loads (mean concentrations) shown in red, and tributary loads (mean concentrations) shown in blue, were derived from consent data 1996-2001 (up to 50 data sets used).
3. Donalds Creek flows into Lake Wairarapa and although part of the Ruamahanga system its contribution is likely to be assimilated before the lake discharges to the lower Ruamahanga River system.
4. The receiving water streams or rivers (green bars) have their loads represented prior to the wastewater discharges. To calculate the actual contribution of the tributaries to the Ruamahanga River the point source load and tributary load would need to be added.
5. The Waihenga sampling site is the last site on the Ruamahanga River and is upstream of the confluence with Donalds Creek. There is no site downstream of all discharges.