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Joint supplementary submission ‘Managing our Wetlands’: discussion document on proposed changes to the wetlands regulations

This written submission is provided to Ministry for the Environment jointly by New Zealand Fish and Game Council, and DairyNZ.

Submitter Details

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Introduction

The New Zealand Fish and Game Council, and DairyNZ welcome the opportunity to provide our jointly agreed comments on the Ministry for the Environment’s (‘MfE’) discussion document seeking feedback on proposed changes to the Resource Management (National Environmental Standards for Freshwater) Regulations 2020 (‘NES-F’) specifically regarding managing wetlands.

The joint supplementary submission follows the independent submissions made by both organisations and is intended to reflect the areas where our positions and feedback is aligned for wetland management.

Fish and Game New Zealand background

Fish and Game is the statutory manager for sports fish and game birds in New Zealand, with functions conveyed under the Conservation Act 1987 and Wildlife Act 1953. The organisation is an affiliation of 13 separate Fish and Game Councils – 12 regional Councils and one national Council. Together, these organisations represent roughly 140,000 anglers and hunters.

Wetlands and their health play a key role in Fish and Game's operations as the primary habitat for the majority of game birds and we have a statutory mandate to maintain and enhance this habitat. Nationally Fish and Game manage a number of wetlands as well as routinely operating restoration programmes to enhance the quantity and quality of wetland habitat. These operations have a dual benefit, creating increased habitat for game birds and accordingly increased opportunity for game bird hunters as well as providing increased habitat for a number of critically endangered indigenous species. Currently \$4 per game bird licence issued by Fish and Game goes to the Game Bird Habitat Trust, which oversees a grant programme for wetland restoration and construction. Since its inception in 1990 Fish and Game has been one of the strongest voices for freshwater in New Zealand.

DairyNZ background

DairyNZ is the industry good organisation representing New Zealand's dairy farmers. Funded by a levy on milk-solids and through government investment, our vision is for New Zealand dairy farming to have the world's most competitive and responsible dairy farm systems. DairyNZ's work includes research and development to create practical on-farm tools, leading on-farm adoption of farming within limits, promoting careers in dairying, and advocating for farmers with central and local government.

The Dairy Tomorrow Strategy: The Future of New Zealand Dairying makes a firm commitment to the communities that dairy farmers are part of, and to the environment that communities value. DairyNZ recognises the important role wetlands have in enhancing dairy farm systems, by performing multiple ecosystem services including; contaminant filtration and transformation (especially nitrogen but also phosphorus, sediment and bacteria), sediment settling and carbon sequestration.

Dairy farmers have the opportunity to play a significant role in reversing wetland loss, and with that improve water quality outcomes, through restoration and constructed wetlands on farmland. Wetlands feature as a key aspect of the Dairy sectors commitment to protect and enhance biodiversity under Dairy Tomorrow. Specifically, DairyNZ is actively promoting the protection of wetlands on dairy farms for both biodiversity and water quality outcomes. This includes conducting or commissioning literature reviews, design guidance, performance estimates and educational material to support the uptake of constructed wetlands (see [Wetlands - DairyNZ](#)).

Summary of joint position

Both DairyNZ and New Zealand Fish and Game Council represent groups seeking to protect and enhance wetland ecosystems and their associated plant and animal diversity, including the environmental services wetlands provide.

Key Points of Agreement

1. DairyNZ and New Zealand Fish and Game Council recognise the important ecological role wetlands have within their catchment, performing multiple ecosystem services including; contaminant filtration and transformation (including nitrogen, phosphorus, and bacteria), sediment settling and carbon sequestration.

2. Regulations safeguarding existing wetland environments are supported as a critical component of preventing further wetland ecosystems loss (extent and value), while preserving and enhancing their important biodiversity and cultural values.
3. If the loss and degradation of wetlands is to be addressed, encouraging wetland (both natural and constructed) restoration and maintenance is vital. A collaboration between DairyNZ, NIWA, regional councils, MfE and MPI, Fish and Game New Zealand and other stakeholders, developed, endorsed and published key design guidance and performance estimates for constructed wetlands to reduce contaminant loss from pastoral farms. This guide is part of an ongoing effort to contribute on-the-ground support for farmers and farming stakeholders in wetland construction and management best practice.
4. We support the recognition of constructed wetlands as being a distinct category of wetland including those created to reduce nutrients and sediment entering streams, rivers and lakes. Constructed wetlands also provide the opportunity for the re-establishment of wetland habitats and related biodiversity.
5. We agree maintenance should be included alongside restoration within the regulation in order to better represent the broad range of activities required within a managed wetland environment.
6. Removal of exotic vegetation species should be permitted as currently the limitations on area of removal of exotic vegetation are impeding crucial ongoing restoration and maintenance of wetlands. Activities that are intended to improve environmental or biosecurity outcomes should be encouraged and permitted. Weed clearance using hand tools is likely to have little impact due to their light nature however, should be permitted in conjunction with machine operated maintenance in alignment with environmental/biosecurity outcomes sought.
7. Given the continued loss of wetlands and flow-on effects to a wide variety of species that rely on them, Fish & Game New Zealand and DairyNZ understand the need to safeguard wetland environments, therefore the regulations need to be carefully considered to provide for wetland construction, maintenance and restoration activities without onerous consenting barriers.