

Mā tō tātou takiwā
For our District

Policy Committee

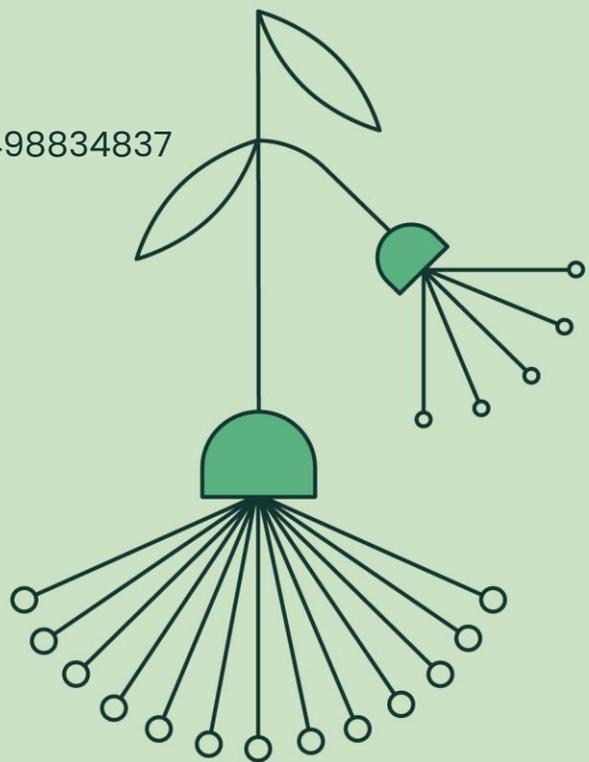
Komiti Kaupapa Here

PP22-3

Tuesday, 5 April 2022, 9.30am

Via Zoom

<https://westernbay-govt-nz.zoom.us/j/89498834837>



Policy Committee

Membership:

Chairperson	Mayor Garry Webber
Deputy Chairperson	Cr Monique Gray
Members	Cr Grant Dally Cr Mark Dean Cr James Denyer Cr Murray Grainger Cr Anne Henry Cr Kevin Marsh Cr Margaret Murray-Benge Deputy Mayor John Scrimgeour Cr Allan Sole Cr Don Thwaites
Quorum	6
Frequency	Six weekly

Role:

- To develop and review strategies, policies, plans and bylaws to advance the strategic direction of Council and its communities.
- To ensure an integrated approach to land development (including land for housing), land use and transportation to enable, support and shape sustainable, vibrant and safe communities.
- To ensure there is sufficient and appropriate housing supply and choice in existing and new urban areas to meet current and future needs.

Scope:

- Development and review of bylaws in accordance with legislation including determination of the nature and extent of community engagement approaches to be employed.
- Development, review and approval of strategies and plans in accordance with legislation including determination of the nature and extent of community engagement approaches to be employed.
- Subject to compliance with legislation and the Long Term Plan, to resolve all matters of strategic policy outside of the Long Term Plan process which does not require, under the Local Government Act 2002, a resolution of Council.
- Development of District Plan changes up to the point of public notification under the Resource Management Act 1991.
- Development of the Future Development Strategy and urban settlement plan.
- Consider and approve changes to service delivery arrangements arising from service delivery reviews required under the Local Government Act 2002 (provided that where a service delivery proposal requires an amendment to the Long Term Plan, it shall thereafter be progressed by the Annual Plan and Long Term Plan Committee).

- To report to Council on financial implications of policies and recommend any changes or variations to allocated budgets.
- Listen to and receive the presentation of views by people and engage in spoken interaction with people pursuant to section 83(1)(d) of the Local Government Act 2002 in relation to any processes Council undertakes to consult on under the special consultative procedure as required by the Local Government Act 2002 or any other Act.
- Oversee the development of strategies relating to sub-regional parks and sub-regional community facilities for the enhancement of the social and cultural wellbeing of the Western Bay of Plenty District communities, for recommendation to Tauranga City Council and Western Bay of Plenty District Council.
- Develop the draft Statement of Intent for any Council Council-Controlled organisation (CCO) and review, assess and make recommendations to Council on any modifications to CCO or other entities' accountability documents (i.e. Letter of Expectation, Statement of Intent) or governance arrangements.
- Approve Council submissions to central government, councils and other organisations, including submissions on proposed plan changes or policy statements.
- Receive and make decisions and recommendations to Council and its Committees, as appropriate, on reports, recommendations and minutes of the following:
 - SmartGrowth Leadership Group
 - Regional Land Transport Committee
 - Any other Joint Committee, Forum or Working Group, as directed by Council.
- Receive and make decisions on, as appropriate, any matters of a policy or planning nature from the following:
 - Waihi Beach, Katikati, Ōmokoroa, Te Puke and Maketu Community Boards,
 - Maketu-Te Puke Ward Forum
 - Kaimai Community Ward Forum
 - Katikati- Waihi Beach Ward Forum

Power to Act:

- To make all decisions necessary to fulfil the role and scope of the Committee subject to the limitations imposed.

Power to Recommend:

- To Council and/or any Committee as it deems appropriate.

Power to sub-delegate:

- The Committee may delegate any of its functions, duties or powers to a subcommittee, working group or other subordinate decision-making body subject to the restrictions within its delegations and provided that any such sub-delegation includes a statement of purpose and specification of task.

Notice is hereby given that a Policy Committee Meeting
will be held via Zoom on:
Tuesday, 5 April 2022 at 9.30am

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1 PRESENT**2 IN ATTENDANCE****3 APOLOGIES****4 CONSIDERATION OF LATE ITEMS****5 DECLARATIONS OF INTEREST**

Members are reminded of the need to be vigilant and to stand aside from decision making when a conflict arises between their role as an elected representative and any private or other external interest that they may have.

6 PUBLIC EXCLUDED ITEMS**7 PUBLIC FORUM**

A period of up to 30 minutes is set aside for a public forum. Members of the public may attend to address the Board for up to five minutes on items that fall within the delegations of the Board provided the matters are not subject to legal proceedings, or to a process providing for the hearing of submissions. Speakers may be questioned through the Chairperson by members, but questions must be confined to obtaining information or clarification on matters raised by the speaker. The Chairperson has discretion in regard to time extensions.

Such presentations do not form part of the formal business of the meeting, a brief record will be kept of matters raised during any public forum section of the meeting with matters for action to be referred through the customer contact centre request system, while those requiring further investigation will be referred to the Chief Executive.

8 PRESENTATIONS**9 REPORTS**

10 INFORMATION FOR RECEIPT

10.1 WESTERN BAY OF PLENTY DISTRICT COUNCIL'S FEEDBACK TO PROPOSED CHANGES TO THE RESOURCE MANAGEMENT (NATIONAL ENVIRONMENTAL STANDARDS FOR SOURCES OF HUMAN DRINKING WATER) REGULATIONS 2007

File Number: A4508672

Author: Tony Clow, Senior Policy Analyst Resource Management

Authoriser: Rachael Davie, Group Manager, Strategy and Community Services

EXECUTIVE SUMMARY

1. The Ministry for the Environment (MfE) recently consulted on proposed changes to the Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007 (NES-DW). Feedback closed on 6 March 2022 and Western Bay of Plenty District Council (WBOPDC) submitted its feedback on 3 March 2022, signed by Mayor Webber.
2. While it is usual practice to present a draft of any submission for consideration by the Policy Committee in advance of it being finalised, the consultation close date and staff capacity constraints precluded this from happening.
3. This report explains and presents Council's feedback on the proposed changes to the (NES-DW).

RECOMMENDATION

That the Senior Policy Analyst's report dated 5 April 2022, titled 'Western Bay of Plenty District Council's Feedback to Proposed Changes to the Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007', be received and the information noted.

BACKGROUND

4. The Bay of Plenty Regional Council is largely responsible for administering the NES-DW as the consent authority responsible for the maintenance and enhancement of the quality of water in water bodies. The NES-DW is relevant to Western Bay of Plenty District Council (WBOPDC) as:
 - Consent authority (existing responsibility to consider if an activity may lead to a significant adverse effect on water quality e.g., chemical spill / flood)
 - Water supplier (affected by existing and proposed requirements)
 - Landowner (potentially affected if establishing a non-complying land use).

CURRENT NES-DW

5. MfE released a consultation document which summarises the purpose of the NES-DW and reasons for its review including the following:
- *The Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007 (NES-DW) were intended to support source water protection by providing national direction on how to manage activities that could impact the quality of treated drinking water.*
 - *A Government review of the 'Three Waters' regulatory system was initiated following an incident in Havelock North in 2016, where four people died and an estimated 5,500 fell ill with gastroenteritis.*
 - *The current NES-DW specifies technical details for regional plan rules and consenting decisions, where activities are likely to result in certain drinking water supplies breaching national standards after treatment.*
 - *The Havelock North Inquiry (HNI) identified various issues with the current regulatory regime, including 'significant problems' with the NES-DW and the protection of source water. In particular, the NES-DW is complex and difficult to interpret and apply, it doesn't cover the full range of activities that can pose a risk to source water, nor provide adequate protection for water supplies serving less than 500 people. The HNI recommended a full review of the NES-DW to enable risks to source water to be addressed in a straightforward and comprehensive manner.*

PROPOSED CHANGES TO THE NES-DW

6. The proposed amendments to the NES-DW are to strengthen and align national direction for protection and management of source water. There are three key proposals:

Proposal 1 - Delineating at-risk source water areas

The existing NES-DW requires regional councils to identify certain activities 'upstream' of an 'abstraction point' which are 'likely' to contaminate treated drinking water. However, identifying these areas has been difficult in practice. It is challenging to apply this to groundwater, it overlooks that some activities downstream or downgradient (In the case of aquifers) can also impact source water, and in catchments where 'upstream' is a substantial area there is no guidance to narrow down the area.

It is proposed to replace this approach with a default methodology for delineating three 'source water risk management areas' (SWRMAs). This would be the responsibility of the Regional Council, but they will require the assistance of WBOPDC. The three SWRMAs are:

- SWRMA 1 is the immediate area around the source water take where there is an immediate risk of contamination because there is very little time to respond

to any contamination before it enters the water supply. Most activities will be restricted in this area. For aquifers, which is the relevant water source for WBOPDC, it includes land within a five metre radius around the intake (bore).

- SWRMA 2 is a larger area where activities need to be managed to mitigate more medium-term risks of contamination. The size will vary because it is based on the time it takes for water to flow to the source. For aquifers, it is the land area above where groundwater travels to the intake (bore) within a one year period, to a maximum of 2.5 kilometres.
- SWRMA 3 is the entire catchment area for the source water. Persistent contaminants and cumulative effects of all activities within the catchment are the management focus in this area.

Proposal 2 - Managing activities that pose risks to source water

To better manage activities that pose risks to source water, the following changes are being considered:

- Within SWRMA 1, for any person other than the drinking-water supplier (e.g., WBOPDC), placing stringent controls on activities to avoid, or where necessary, mitigate adverse effects on source water. This could include controls on the drilling of bores, earthworks over vulnerable aquifers, uses of the beds of lakes and rivers, taking of water, and discharges of contaminants to land and water.
- Within SWRMA 2, ensuring that regional councils do not permit activities that pose a high-risk to source water. Potential high-risk activities include direct discharges of contaminants to water and land disturbance over vulnerable aquifers. All consenting in this area would need to actively consider the effects of the activity on source water.
- Within SWRMA 3, no additional restrictions are proposed as current requirements under the RMA are considered adequate. The proposed amendments to the NES-DW will simply clarify that the effects of any activity on source water must be considered in a catchment used for source water.

Proposal 3 - Protecting all registered water supplies

It is proposed that the NES-DW would apply to all registered drinking-water supplies through an approach that aligns with the transition timeframes in the Water Services Act 2021 (WSA).

This would be 12 months for currently registered supplies to re-register (by November 2022) and four years for unregistered supplies to register (by November

2025). The NES-DW would apply to the currently unregistered supplies as soon as they are registered.

FEEDBACK TO PROPOSED NES-DW

7. MfE suggested that feedback be provided by answering a number of consultation questions (1 to 41).
8. Staff from the Resource Management Team and Utilities Teams prepared the feedback on this basis.
9. The WBOPDC feedback on the main proposals can be summarised as follows:
 - Supportive of a default methodology for the delineation of SWRMAs. This is a better approach than relying on a definition of 'upstream'. However, it is suggested that further work is necessary to accurately identify the parameters for how these areas are to be delineated.
 - Supportive of the proposal to control activities within the SWRMAs as this will provide better protection for our water sources than previously. However, consideration will need to be given to ensuring that the restrictions are only as much as required to improve water quality without being overly onerous on landowners.
 - Not supportive of the need for the large number of smaller supplies to be registered and comply with the NES-DW due to concerns that many of the suppliers may not have the resources to comply.
10. The full WBOPDC feedback is attached.

ATTACHMENTS

1. **Feedback to NES-DW - Western Bay of Plenty District Council** 



Western Bay of Plenty District Council
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E customer.service@westernbay.govt.nz
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02 March 2022

Name: Garry Webber, Mayor Western Bay of Plenty District Council
Organisation: Western Bay of Plenty District Council
Postal Address: Private Bag 12803, TAURANGA 3143
Daytime telephone: 0800 926 732
Email address: Tony.Clow@westernbay.govt.nz

To whom it may concern,

Thank you for the opportunity to comment on the Proposed Changes to the Resource Management (National Environmental Standards for Sources of Human Drinking Water) Regulations 2007. Please find attached our response to the questions.

Yours sincerely,

A handwritten signature in black ink that reads "Garry Webber".

Garry Webber
Mayor
Western Bay of Plenty District Council

Te Kaunihera a rohe mai i ngā Kuri-a-Whārei ki Otamarakau ki te Uru



Number	Question	Response
Default method for delineating Source Water Risk Management Area (SWRMA)		
1	<p>Domestic and international evidence suggests that delineating three at-risk areas is a good approach for protecting sources of drinking water. Do you think this is a good approach for protecting our source waters? What other approach can you think of that could contribute to protecting our drinking water sources? Do you think that three areas (and therefore levels of control) are sufficient to protect our drinking water sources?</p>	<p>This is a sensible and pragmatic approach for protecting water sources. It would be very difficult to identify risks to aquifers (WBOPDC's relevant water source) from individual property activities.</p>
2	<p>In your view, is the method to determine each SWRMA, for each type of water body, the best option?</p> <ul style="list-style-type: none"> • Should other factors be considered in determining size? • What challenges can you foresee in delineating SWRMAs? • Do you have any comments or feedback on the detail contained in the technical guidance materials? • Should SWRMA for all aquifers be bespoke so their unique features, depth and overall vulnerability can be considered? 	<p>There are likely to be problems around identifying the correct parameters for each water body type, particularly aquifers and the activities that contribute to risks (the ability to prove and measure). It may also be impractical to respond to a discharge of contaminants into a river within the SWRMA 1 as it would only take 20-30 minutes for the contaminants to travel 1km. This would require councils to constantly monitor in order to be able to identify the discharge and shut the intake within that time. In addition to delineating areas, responsibility from the property owner is also required to ensure activities don't contaminate water sources.</p>
3	<p>For lakes, do you agree that SWRMA 2 should include the entire lake area? What might be an alternative approach?</p>	<p>Yes.</p>

4	<p>SWRMA 1 for lakes and rivers is proposed to extend 5 metres into land from the river/lake edge. This contrasts with 3 metre setback requirement of the Resource Management (Stock Exclusion) Regulations 2020. SWRMA 1 is proposed to be used as a basis for controlling activities close to source water intakes and applies to a wide range of activities. Do you think these differing setbacks will cause confusion or result in other challenges?</p>	<p>Consistency is needed and we would support 5m for both.</p>
5	<p>There is evidence suggesting that a 10–30-metre radius around source water bores is a preferable way to delineate the area where activities would be heavily restricted (SWRMA 1). However, a 5-metre radius is the most workable option for the location of intakes in New Zealand.</p> <ul style="list-style-type: none"> • Do you agree that a 5-metre radius around a source water bore gives enough protection? Why or why not? • If not, what alternative would you suggest? 	<p>A 10–30m restriction on activities around bores would be more successful and beneficial than five meters. However, when we consider existing bores for water suppliers, there are many around the country where this could not be achieved retrospectively due to land boundaries and existing infrastructure or land development. In this case, the rules must allow latitude for the bore owner to design an alternative within the five-metre area such as increased security fencing or structures to prevent ingress to the bore head structure.</p>
6	<p>While water takes from complex spring systems or wetlands may require a bespoke SWRMA to ensure consideration of any contamination pathways present, a default method is necessary to ensure interim protection. Do you think a default method is practicable in most situations?</p> <ul style="list-style-type: none"> • Do you think a regional council should determine (on a case-by-case basis) the most applicable default method for a river, lake or aquifer, or is a different default approach necessary? • If so, what alternative would you suggest? 	<p>This should be considered on a case-by-case basis for both the water supplier and the Regional Council to agree on a sound and specific approach where needed.</p>

Regional council mapping of SWRMAs		
7	How long do you think is necessary for regional councils to delineate SWRMAs for currently registered water supplies in each region using the default method?	It may take three to five years. There will be a significant amount of work and discussion needed in determining the areas of influence for each SWRMA.
8	What challenges do you foresee in delineating SWRMAs, when previously unregistered supplies are registered with Taumata Arowai (see Proposal 3 for more details)?	There are a vast number of these small drinking water suppliers. Once registered, it may be difficult to engage with them on the SWRMAs and would take a large amount of resources to do so.
9	What support could enable regional councils to delineate SWRMAs within shorter timeframes?	Input of resources from the water supplier such as territorial authorities.
10	Do you think consideration should be given to mapping currently unregistered supplies as they register (but before the four-year deadline provided under the Water Services Act), or do you think that waiting and mapping them all at the same time is a better approach?	Mapping them all at the same time would be a better approach and toward the end of the four year period. This should allow time to address gaps in the information and take into account changes over that time period.
The bespoke method for delineating SWRMAs		
11	If a regional council has already established local/regional source water protection zones through a consultative process, should there be provision to retain that existing protection zone as a bespoke method without further consultation or consideration against new national direction?	Yes, unless the source user has other information to suggest otherwise.

SWRMA 1 controls		
121	<p>Do you think national direction on activities within SWRMA 1 is necessary?</p> <ul style="list-style-type: none"> • If so, what activities should it address? • How restrictive should controls be in SWRMA 1, for resource users other than water suppliers? • Are there any activities you believe should be fully prohibited in this area? • Are there any activities you believe should be permitted or specifically provided for or acknowledged in this area? 	<p>National direction would be valuable as it would ensure consistency in plans across the country and avoid each regional council needing to do this exercise individually. For lakes and rivers, must allow for public recreational activities which don't pose a threat to the water source.</p>
13	<p>For water suppliers, are there any other activities beyond intake maintenance/management that should be provided for?</p>	<p>There should be the ability to complete the riparian fencing and planting protection through all levels of rivers and streams. Onsite effluent treatment (OSET) systems near bore heads pose a possible risk to shallow aquifers and there needs to be some planning guidelines to protect the water sources.</p>
14	<p>In and around freshwater, control of pest species (including aquatic pest species) may be necessary, including through physical control (removal, that may include bed disturbance) or chemical control (discharge).</p> <ul style="list-style-type: none"> • How much of an issue is this in and around abstraction points? • How critical is that work? • How often is this work mandated by other regulation or requirements? • How frequently is this work undertaken by parties other than the drinking-water supplier (or their contractors)? 	<p>No comments.</p>

SWRMA 2 controls		
15	<p>Do you think national direction on activities within SWRMA 2 is necessary?</p> <ul style="list-style-type: none"> If so, what activities should it address? 	<p>National direction would be valuable as it would ensure consistency in plans across the country and avoid each regional council needing to do this exercise individually.</p> <p>Possible activities to consider would include onsite effluent treatment (OSET) systems, septic tanks, farm wastewater irrigation, chemical spray controls and nutrient application controls.</p>
16	<p>In your view, how much will this proposal impact the current situation in your region?</p> <ul style="list-style-type: none"> What discharges to water are currently permitted? Should provision be made to continue to permit those activities? What controls are typically used to ensure potential adverse effects are managed? 	<p>Some of this could not be achieved retrospectively due to historic development. For example, many of WBOPDC's bores are adjacent to roads and so establishing a 5 metre zone is unachievable.</p>
17	<p>Are there any other activities that should not be permitted within SWRMA 2?</p>	<p>No comments.</p>
18	<p>The original intent of SWRMA 2 was to manage microbial contamination. However, there are indications that protections against other contaminants may be required. What contaminants do you think should be controlled in SWRMA 2?</p>	<p>See answer to 15.</p>
19	<p>What other challenges do you see when making a consent application within SWRMA 2?</p>	<p>No comments.</p>

SWRMA 3 controls		
20	Do you think any additional controls, other than broad consideration of the effects of the activity on source water, are required in SWRMA 3?	No.
Groundwater bore management		
21	What is your view on how to address issues with bores – should it be enough to amend the NZS 4411:2001 (with reference to that standard in the NES-DW), or should greater direction be given in the NES-DW itself?	Amending NZS4411:2001 should be sufficient.
22	<p>For existing bores:</p> <ul style="list-style-type: none"> • What is your view on requiring unused bores to be decommissioned? • Should bores of poor quality be required to be upgraded or decommissioned? What timeframe might be reasonable to do this? • For many older bores there are no records. What sort of evidence could be used to support the ongoing use of these bores, or demonstrate they pose a low risk to the security of the aquifer? 	Where existing bores pose a risk to the aquifer, an improvement program should be required to identify the problems and a plan be developed to upgrade the bore. Bore owners should be provided with guidance on how to upgrade the bore and realistic timeframes should be set to achieve the upgrade. If bores are no longer being used, we recommend these should be decommissioned. Bore depths, water flow takes, water quality and draw down water levels are essential data needed from all bores to manage the resource for all users.
23	What is your view on prohibiting below-ground bore heads?	For new bores, the approach should be to keep them above ground and on a raised floor above the flood levels. For existing below ground bore heads, the cost to bring them above ground can be extremely expensive. Therefore, the sensible approach is for the bore owner to modify and/or demonstrate that the below ground bore head is

		protected against flooding and has a drainage system to automatically drain water from within the chamber.
24	Regional councils are responsible for control of the use of land for the purpose of maintenance and enhancement of the quality of water in water bodies (RMA section 30(1)(c)(ii)). Do you think territorial authorities have a role in land management over aquifers, and if so, what is that role?	Territorial authorities in some situations may still have the ability to control the use, storage and transportation of hazardous substances in order to avoid these being unintentionally discharged into waterways.
identifying and managing activities over vulnerable aquifers		
25	It is not clear which approach might be best for ensuring risk to vulnerable aquifers is appropriately managed. Do you think that an NES-DW is the right tool for addressing this? If not, what approach might be better?	Yes, the NES-DW is the right tool for addressing vulnerable aquifers.
26	Would it be helpful if guidance on vulnerable aquifers was provided to support freshwater planning as the NPS-FM is given effect?	Yes.
Retrospective application of the NES-DW to existing activities		
27	What activities do you believe the NES-DW should retrospectively apply to / not apply to, and why?	Retrospective application of the NES-DW should not be applied where this affects third parties' properties or where it makes it unachievable to comply without shutting down the source takes etc. Activities currently happening under an existing consent should be allowed to continue through to the consent expiry and consideration of impacts where a consent is renewed.

28	In your view, what are the key challenges and benefits to retrospective application?	See above comments. Also, retrospective applications should not have a negative impact socially, economically, or culturally. Hence the need to allow latitude to make improvements where possible toward the intent of the NES - DW.
Criteria when considering effects on source water		
29	Do you agree with the proposed list of criteria? • Are any additional criteria needed, or clarification?	Support the list included.
Proactive response planning		
30	What types of activity might pose a significant risk to a water supply in an accident, emergency, or other natural event?	Chemical and biological bulk containment and wastewater treatment. Flooding from extreme rainfall.
31	Do you think it is reasonable to require all activities with some potential to affect source water to undertake response planning, or just those with a higher risk (likelihood and consequence)?	No, just those with a higher risk. A clear form of measurement of risk needs to be established.
32	Do you agree that resource users should engage with water suppliers in consenting matters, within SWRMA 1 and 2?	Yes. This will ensure drinking water suppliers are aware and can take responsibilities for activities which may impact on their water supply.
33	What hurdles do you see in promoting this engagement with water suppliers?	The need to identify how is this going to be managed, by whom and under what processes? Lack of resourcing.

34	<p>What support might small water suppliers need to effectively engage in the consent process?</p>	<p>This is an affordability, resource, knowledge, and logistical problem. Small water suppliers, e.g., a few rural properties sharing a small take from a stream, probably have a high appreciation of protecting the source as it affects them directly and immediately. Simple solutions and options to source protection need to be offered in a proactive process. Assistance both technically and financially will be needed. This has to be an improvement process for the user and administrator and not impact on the ability to provide water to the localised group of users. They would also need resourcing and advice on impacts.</p>
<p>General matters relating to managing source-water risks</p>		
35	<p>A National Environmental Standard is a regulation under the Resource Management Act 1991 (RMA) that requires, among other things, that regional councils make changes to their regional plan rules. Making these changes can add costs (eg, financial, administrative) for regional councils.</p> <ul style="list-style-type: none"> • In your view, how might regional councils be affected by the NES-DW's new requirements to change regional plan rules? • Do these effects outweigh the expected benefits of better source water protection? 	<p>We need to be sure that the outcomes of any changes are substantive, worthwhile and achieve significant gains. It must be affordable and not onerous for all parties, Flexibility in addressing issues must be included to ensure gains can be made where retrospective application is not possible.</p>
36	<p>In your view, how could the amendments to the NES-DW better align with farm plans?</p> <ul style="list-style-type: none"> • Is reliance on the NPS-FM, NES-F and Stock Exclusion Regulations enough to manage the long-term effects of farming activities on underlying aquifers and waterbodies? 	<p>River and stream riparian planting and protection fencing etc.</p>

	<ul style="list-style-type: none"> Can you identify potential duplication between the NES-DW and other regulations that control land use? 	
37	<p>If you are a water supplier, do you think these amendments will affect your ability to supply water (positively or negatively)? Would they influence whether you continue to provide water?</p>	<p>Water Suppliers will have to continue to supply water. The amendments will increase the cost and resources needed to comply. Overall, it will provide a level of security around our drinking water supplies which we see as having a positive impact.</p>
38	<p>If you are a resource user, do you think these amendments will affect how you currently use your land or undertake activities? Will you have to change how you do things as a result?</p>	<p>It could impact or restrict what we do if these changes are all applied retrospectively, and impact on growth in the community if further water resources cannot be secured due to the ability to comply.</p>
Which water supplies should be protected by the NES-DW		
39	<p>Do you think the protections of the NES-DW should apply to all registered water supplies?</p> <ul style="list-style-type: none"> If not, what types of suppliers should be included, and why? 	<p>This should apply to large users who have the ability to resource and mechanisms to fund the improvements for the majority of the users.</p>
40	<p>The WSA has a registration timeframe of four years for currently unregistered supplies.</p> <ul style="list-style-type: none"> Do you agree with aligning application of the NES-DW with the WSA? If not, why? In your view, what are the challenges resulting from including these newly registered supplies within the NES-DW framework? 	<p>There are a vast number of smaller un-registered suppliers. Each will have a different system with unique challenges. Full application of the NES-DW may not be achievable and what other alternative sources exist. The challenges include cost, ability to change and make improvements, lack of alternative solutions. Hence this is where the latitude to address the issues to some degree is needed if total solutions cannot be achieved in the framework.</p>

Other comments		
41	<p>Do you have any other comments you wish to make?</p> <p>.</p>	<p>Overall, we support what is proposed. It will provide a greater degree of protection to our drinking water, which has not been well managed in the past. It will be difficult to retrospectively apply some of the rules as covered in the points above.</p> <p>The changes and impacts must be:</p> <ul style="list-style-type: none"> • Incremental, balanced, worthwhile benefits for the input. • Achievable, flexible, measurable and affordable for all levels of water suppliers. • Valued improvements in real terms for the water source and consumer it is trying to protect. • Not a burden to people’s livelihoods and personal circumstance. • Not so restrictive on the establishment of activities that they have adverse impacts on the economic growth of regions.