Ruamāhanga Whaitua Committee

Examining options for allocating discharge limits in the Ruamāhanga – starting out

The Ruamāhanga Whaitua Committee was asked at their 13 February 2017 workshop to look into allocation of discharges as one policy option amongst many that can be used to achieve freshwater objectives. A simplified version of the following diagram was provided showing the potential elements of any policy package. This memo relates to the 'allocation approach' for discharge limits and summarises the Committee's work and identifies ideas for the next steps in this discussion.

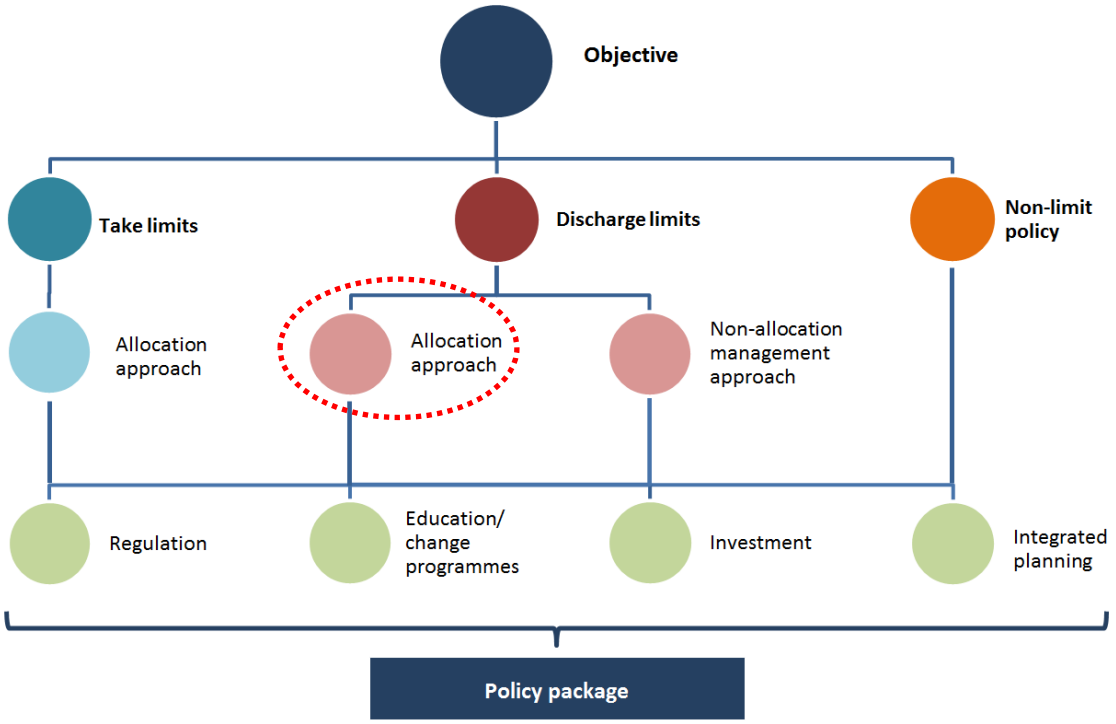

Figure 1. Potential parts of a policy package designed to meet an identified objective. Focus of this memo circled in red. NB. Under the NPS-FM, it is compulsory to identify take limits and discharge limits necessary to meet a freshwater objective.

There are two key questions in consideration of allocation approach for discharges. These are:

1. Is it possible to allocate the contaminant? i.e. Are there constraints which mean you can't allocate?
2. Should you allocate the contaminant? i.e. What are the pros and cons of using an allocation approach vs a non-allocation approach?

Addressing the first question allows elimination of those contaminants that are not able to be allocated and that must, consequently, be addressed with a non-allocation management approach.

The Committee examined four major contaminants (nitrogen, phosphorus, sediment and pathogens) in relation to the first question at their 13 February workshop. The second question of 'should' a contaminant be allocated will be the focus of discussion at an upcoming Committee workshop.

In examining whether a contaminant can be allocated, the Committee looked into:

a. Whether the contaminant can be attributed to individual resource users, and

b. Whether the discharge of that contaminant by an individual resource user can be accurately measured or accurately estimated on an ongoing basis.

These are key criteria and need to be answered in the positive (at least mainly!) in order that the answer to 'could you allocate?' is yes. The Committee was asked to consider these questions for both point source discharge and diffuse discharge activities in the Ruamāhanga whaitua. The following table shows the outcomes of that activity:

	Point source discharges		Diffuse discharges	
	Can it be attributed to an individual?	**Can an individual's loss be measured or estimated?**	**Can it be attributed to an individual?**	**Can an individual's loss be measured or estimated?**
Nitrogen	Yes	Yes	Yes, but may not be feasible to do it now	Yes (e.g. Overseer or lysimeters)
Phosphorus	Yes	Yes	Yes, but may not be feasible to do it now	Yes
Sediment	Yes (but can be difficult, e.g. via stormwater pipe)	Yes	No, but there are evolving tools that may be suitable in the future	No, but there are evolving tools that may be suitable in the future
Pathogens	Yes	Yes	No	No, methods not currently feasible

This analysis indicates that all contaminants can be allocated for point source discharges, but only nitrogen and phosphorus are able to be allocated to diffuse discharges, and even then with some contingencies. The 'challenge' for N and P diffuse discharges relates to whether our ability to attribute diffuse discharges to resource users in the whaitua now is good enough. This will be examined further in upcoming workshops.

The Committee also identified some concepts that are useful in considering the second question of 'should' you allocate a contaminant:

- An 'allocation' gives someone a property right – we need to be able to define this very clearly
- Allocation provides certainty to resource users
- Allocation can be costly/complicated to administer
- Consideration needs to be made of the implications for the future if there is no allocation of a contaminant now
- Allocation at a sub-catchment scale (rather than to an individual) is another option; however, this is likely to be expressed in a regional plan as its own sub-catchment limit