



Submission on Freshwater National Direction



25 July 2025

About the Public Health Communication Centre

The Public Health Communication Centre (PHCC) is an independent and philanthropically funded organisation dedicated to increasing the reach and impact of public health research in Aotearoa New Zealand. We are hosted by the Department of Public Health at the University of Otago Wellington. The Centre has a range of public health experts and science communication experts. The Directors/Co-Directors are Professors Michael Baker, Nick Wilson and Simon Hales.

The PHCC identifies and promotes opportunities to improve public health, equity, and sustainability, and communicates these ideas to the public, media, and decision-makers.

Summary

The PHCC believes that the proposed changes to national freshwater policy will put public health at risk and undo critical policy progress on the protection of drinking water sources.

We oppose:

- **Removing or reforming Te Mana o te Wai.** Te Mana o te Wai must be retained as it is written in the National Policy Statement for Freshwater Management 2020. Removing or reforming Te Mana o te Wai as is proposed in the consultation document will profoundly weaken protection of human and environmental health. Freshwater health is inextricably linked to human health, drinking water quality and access being one obvious example. Removing or reforming Te Mana o te Wai would allow for well-resourced polluting commercial interests to dominate decision-making with regards to freshwater to the point where it harms public health. In public health literature, the phenomenon of commercial interests harming communities is known as commercial determinants of health and is well-documented.¹ Te Mana o te Wai is essential not only for freshwater restoration and protection but also for equity in decision-making, with its hierarchy and principles strengthening policy in the public interest and demanding tangata whenua and wider community engagement in regional decision-making. Protecting waterway health is also critical for protecting Māori health and well-being, for example (but not limited to) where those waterways impact on food sources within waterways and the coastal areas.
- **Removing the national bottom lines for contaminants.** This goes against expert advice and endangers public health. Without ecosystem health bottom lines, councils have struggled to find the necessary resources and expertise to establish bottom lines that are sufficient to protect environmental and human health. For example, in the absence of national bottom lines for ecosystem health of groundwater, councils have too commonly defaulted to the human health standard for nitrate as a groundwater limit, which is grossly insufficient to protect

¹ Gilmore AB, Fabbri A, Baum F, Bertscher A, Bondy K, Chang H-J, et al. Defining and conceptualising the commercial determinants of health. The Lancet. 2023;401(10383):1194-213.

ecological health and has failed to protect human health. The most recent national data shows more than 12% of monitored groundwater sites have breached drinking water standards for nitrate in the past five years, with 45% of sites nationally showing worsening trends.² Furthermore, the ‘maintain and improve’ requirement has not been articulated clearly enough to hold councils to account on it, as evidenced by ongoing decline in water quality since it was introduced. It must not be the only public interest safety net officials propose. Without sufficiently stringent ecosystem health national bottom lines for contaminants such as nitrogen, we submit that environmental degradation will continue worsen, leading to intergenerational impacts on the health and stability of communities.

- **Any policy change that will facilitate increased intensification of agricultural land use, weakened restrictions for wastewater discharges and degradation of the ecological health of fresh waterways.** Impacts on public health from agricultural intensification and poor wastewater treatment are already well documented and, in many cases, pronounced in Aotearoa New Zealand. The health and resilience of the natural environment is a foundation for the health of communities, and, alongside climate change, degraded ecosystems render human communities more vulnerable to the impacts of disaster events.

We support:

- **Introducing the requirement regional councils to map source waters.** However, the value of this for protecting public health is maximised by source water having priority through the Te Mana o te Wai hierarchy, above commercial activities. We note that the Government Inquiry into the Havelock North campylobacteriosis outbreak emphasised that the protection of source water is “the first, and most significant, barrier against contamination and illness”. Vitally, the Government must also understand that degraded waterways cannot and do not provide good quality source water. Faecal contamination, excess sediment and nutrients impact the health of a waterway and pose risks to human health, with treatment for contaminants not always possible (complex or prohibitively expensive) or sufficiently effective. The health of waterways and drinking water quality are linked, which is why the Te Mana o te Wai hierarchy appropriately asserts that councils must prioritise both.

Finally, **we are deeply concerned that public health expertise is not being included in the Ministry for the Environment’s analysis of public consultations.** We note the Ministry’s summary of submissions on the Resource Management (Freshwater and other matters) Amendment Bill did not include any note on submissions from public health experts despite public health experts making submissions.³ While fewer than other sectors, the public health sector’s submissions are crucial to a full understanding of the impacts of freshwater policy change. We hope to see more inclusion of public health expertise the summary and briefings to Ministers on the results of this National Direction consultation.

² Moreau M, Herpe M, and Santamaria Cerrutti M, 2024 Update of the national groundwater quality indicator. 2025: Wairakei, NZ. <https://environment.govt.nz/publications/2024-update-of-the-national-groundwater-quality-indicator/>

³ Ministry for the Environment, Departmental Report: Resource Management (Freshwater and Other Matters) Amendment Bill. 2024: p. 1-90. https://www.parliament.nz/en/pb/sc/submissions-and-advice/document/54SCPRIP_ADV_25161950-a4fc-47b4-ada3-08dc7ab031fe_PRIP6535/ministry-for-the-environment-departmental-report

We attach to this submission an article that elaborates on these issues further. The article, published as a *Briefing* by the Public Health Communication Centre, was authored by the researchers: Marnie Prickett, Dr Mike Joy, Dr Marie Doole and Professor Simon Hales. We support the content of this article, note the evidence sources that it draws on and wish it to be considered as part of this submission.

Thank you for the opportunity to make a submission. Should you require additional information and expertise on the public health impacts of this policy change, **we would be happy to engage further in writing or via a face-to-face meeting.**

ATTACHMENT: Text of the article [Government cannot achieve “enduring freshwater policy” by siding with narrow commercial interests](#) published on the *Public Health Expert Briefing*, 15 July 2025.



[Government cannot achieve “enduring freshwater policy” by siding with narrow commercial interests](#)

15 July 2025

Authors: Marnie Prickett, Mike Joy, Marie Doole, Simon Hales

Summary

The Government has opened public consultation on the changes proposed to establish what it calls “enduring” national freshwater policy.

However, the Government is choosing to go against advice from the majority of regional councils, iwi, freshwater, public health and other experts on the most fundamental elements of our national freshwater policy. It is also choosing to ignore key lessons from the past 15 years of policy development and research.

We argue that the Coalition is too closely aligned with narrow, polluting commercial interests to produce policy that is enduring, instead opening the door to enduring community-level to court-level conflict. Proposed changes risk setting the country back decades in the work to restore the fresh waterways that are foundational for public health and community well-being

What the Government is proposing and what it means

Early in its term, the Coalition announced its intention to rewrite the country’s national freshwater policy, stating it wanted to develop “an enduring and workable National Policy Statement for Freshwater”.¹ Last month, it released its policy discussion document proposing to significantly reduce protections for fresh waterways, including reducing legal protection for drinking water sources.²

What is proposed would have major consequences for public health and community well-being as it will allow further degradation of fresh waterways and good quality drinking water sources.

The current state of our freshwater is dire and communities' drinking water sources are under pressure. For example, the most recent national groundwater monitoring data shows 12% of sites have already breached the drinking water standards for nitrate in the last five years,³ with 45 % of sites indicating worsening trends over a 10-year period.⁴ Increasing nitrogen pollution in Aotearoa New Zealand (NZ) is strongly associated with dairy intensification⁵ and increased irrigation.^{6,7} In parts of the country, communities are already facing the costly, complicated impact of drinking water sources contaminated with nitrate⁷ (see [Appendix](#) for more detail).

Despite the worsening trends in freshwater quality, the Government proposes to remove national bottom lines for contaminants like nitrate (a form of nitrogen). Existing national bottom lines have been hard-won, with many years of freshwater experts pushing for such limits.⁸⁻¹⁰ The first were brought in by the National-led Government in 2014, with then-Minister for the Environment Amy Adams stating, "we are proposing a safety net in national bottom lines for ecosystem and human health".¹¹ At the time, the Government said that it expected "further water quality attributes and numbers will be added over time."¹¹ Since 2014, as public and expert concern for waterways has grown and science developed, policy attributes have been added and/or redeveloped (see [Appendix](#) for more detail). While some bottom lines have been criticised for being too weak⁹ to protect health, their value as a safety net for the public has been broadly understood.

National bottom lines protect the public from self-interested actors making decisions that undermine communities' health and well-being. Councils may be dominated by councillors with primary sector interests¹² or influenced by corporate political activity.¹³ As a result, private interests can pressure decision makers to avoid or weaken regulation protecting the ecosystem and human health needs.^{9,14,15} Without national bottom lines, communities are more vulnerable to harm through loss of the health and stability of their natural environment as well as pollution of their drinking water.

Critically, the Government is also proposing to remove the central decision-making framework in national freshwater policy: 'Te Mana o te Wai'. Te Mana o te Wai's hierarchy requires councils to first protect long-term foundational needs of the public by considering the health of waterways and communities' access to good quality drinking water sources before the needs of commercial entities. This prioritisation sensibly asserts that if waterways are not sufficiently healthy, human health and community well-being are at risk. The hierarchy also recognises these public interests need sufficient weight in law, to counter those with the most resources or influence becoming dominant in decision-making, to the detriment of the wider community and country.⁸

What the Government already knows about support for Te Mana o te Wai

Through consultation last year on the Resource Management (Freshwater and other matters) Amendment Bill,¹⁶ the Government learned the majority of regional councils (responsible for implementing national freshwater policy) supported Te Mana o te Wai¹⁷ as well as all iwi submissions¹⁷, the NZ Freshwater Science Society, public health experts, Water NZ, the NZ Planning Institute, and major environmental groups (more in Table 1). The seafood sector, an industry that relies on good quality freshwater draining into their coastal operations, also firmly opposed removing the hierarchy (Table 1). There was broad consensus from these submitters that removing the hierarchy would result in further degradation. The Ministry for the Environment's Regulatory Impact Statement concluded the same.¹⁸

Agricultural and other polluting industry bodies (such as mining), however, supported removing the hierarchy. Indeed, agricultural sector lobbyists have been actively pressuring the Government to do this before the release of the discussion document.¹⁹ Documents released under the Official Information Act demonstrate agricultural sector lobbyists writing to the Government to ask them to remove national bottom lines.²⁰

The Coalition has close ties to the agricultural sector lobby.²¹⁻²³ Indeed, its freshwater discussion document begins with a message from Minister for Resource Management Reform, Chris Bishop, stating “This Government is committed to enabling primary sector growth as a key driver of both the NZ export sector and prosperity in the wider economy”.² He goes on to say, “right now our freshwater rules are holding it back.” Importantly, not all farmers share the same views as the major agricultural lobby groups on regulation, and many have made significant changes to reduce their impact on freshwater.

On freshwater, the Government is clearly siding with the narrow interests of polluting industries while ignoring the needs of other sectors, like tourism and seafood. It has ignored the views of iwi and regional councils on a key part of freshwater policy, Te Mana o te Wai, and gone against advice from many health, infrastructure, freshwater, planning experts and scientists. They have proposed a system that will further harm our already severely degraded freshwater and undermine any previous efforts by farmers and others to restore waterways.

By doing this, the Coalition is more likely to establish enduring conflict than enduring freshwater policy.

Table 1: Examples of submitters’ statements on Te Mana o te Wai’s hierarchy in submissions on the Resource Management (Freshwater and other matters) Amendment Bill. For a more fulsome summary, see Ministry for the Environment’s Department Report on the Bill submissions, linked in references. Additionally, [all submissions have been published on parliament’s website](#).

Submitter	Statement on Te Mana o te Wai’s hierarchy
Te Uru Kahika (Regional and Unitary Councils Aotearoa)	<p>“Te Uru Kahika supports the fundamental concept of Te Mana o Te Wai. Our overall interpretation of the Te Mana o te Wai concept is that it envisages that waters may be in a degraded state, and if so, they should be restored and protected in a state closer to the natural setting. The hierarchy of obligations (the hierarchy), introduced in 2020, has never been interpreted by councils as advocating for environmental protection at all costs. All three aspects of the hierarchy are considered vital and must be provided for...</p> <p>Removing the hierarchy from consent processes is seen by iwi, hapū and environmental stakeholders as the undermining of Te Mana o te Wai. Our iwi and hapū partners are a fundamental part of our councils’ approaches to addressing water quality challenges across New Zealand. Eliminating the hierarchy will likely invite more scrutiny and controversy and may in fact be counterproductive and result in more complexity.”</p>
National Iwi Chairs Forum	<p>“Te Mana o Te Wai recognises the fundamental importance of freshwater and that protecting the health and well-being of freshwater is critical to the health and well-being of the wider environment, including people. Te Mana o te Wai simply requires water to be used sustainably and without destroying the integrity of the environment. People and the economy are both part of, and reliant upon, on our environment and rather than being constrained or restricted by Te Mana o Te Wai are in actual fact sustained and empowered by Te Mana o Te Wai...</p> <p>Te Mana o te Wai is as much an economic concept as it is an environmental and social concept. It requires that the use of water for the needs of our communities and our economy should be enabled in a manner which ensures the health and</p>

	wellbeing of our waterways. There can be no reasonable objection to that as a matter of principle.”
New Zealand College of Public Health Medicine	<p>“We are disappointed that the Bill disregards key lessons from the Official Inquiry into the Havelock North campylobacteriosis outbreak and reverses subsequent policy changes that were made to strengthen the protection of source water. Importantly, the Inquiry emphasised that source water protection “provides the first, and most significant, barrier against drinking water contamination and illness”. Following the outbreak, the National Policy Statement for Freshwater Management was rewritten to prioritise the health and well-being of water bodies and freshwater ecosystems over commercial interests. This hierarchy of obligations, known as Te Mana o Te Wai, draws on well-established te ao Māori concepts that recognise the mana and mauri of water, and the relationship between water and tangata whenua. It was a major public health gain that also aligns with approaches such as ‘One Health’ and ‘Planetary Health’ which recognise human health as being inextricably linked to environmental determinants...</p> <p>We are strongly opposed to the amendment to exclude Te Mana o Te Wai from resource consent applications and decision-making processes and urge the Government to reconsider this proposed change. In conjunction with the recent Fast-Track Approvals Bill that would allow regional plans (the main mechanism by which source water can be protected) to be overridden, we are concerned that the consequences would increase the pressures on source water quality with potentially serious implications for public health.”</p>
New Zealand Freshwater Sciences Society	<p>“The hierarchy of controls in the current NPS FM is designed to ensure adequate water supply and quality in the long term, which is essential to the health and wellbeing of our freshwater environments, as well as our economy and society. While the controls may start with environmental considerations, it is the same water that is required for human consumption, tourism activities, agricultural production and various industry processes. In the absence of strict controls, the risk of adverse water-related events such as the Havelock North drinking water contamination increases. Therefore, a perceived reduction in regulatory burden now, is likely to just transfer the burden to future players.</p> <p>The only way this [worsening freshwater] trend will change is by prioritising the health of fresh water ahead of other uses and interests.”</p>
Water NZ	<p>“Water New Zealand does not support the removal of the hierarchy of Te Mana o Te Wai.</p> <p>The Bill contains a suite of changes that exclude consideration of Te Mana o Te Wai hierarchy in resource consent decisions. There is no “problem” that these changes will solve. The MFE regulatory impact statement indicates there is no evidence that prioritisation of the health and well-being of waterbodies and freshwater ecosystems is preventing high quality applications for resource consent from being granted, or increasing the cost to applicants.</p> <p>However, it is clear these changes will prevent prioritisation of freshwater health and as a result, will perpetuate the existing trends of water quality degradation. MFE’s analysis concluded, the changes will not safeguard natural resources.”</p>
Seafood NZ	<p>“We do not support the Bill’s proposal to exclude the hierarchy of obligations from resource consent applications and from resource consent decision-making. The National Policy Statement – Freshwater Management hierarchy of obligations provides a weighted order of considerations: first, the health and wellbeing of water bodies and freshwater ecosystems; second, the health needs of people; and third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future. We consider that removing the hierarchy of obligations would result in development decisions that would negatively affect the health of freshwater and coastal and marine systems. The health and wellbeing of our people, communities and primary sectors rely directly on the health and wellbeing of our environment. Therefore, we consider that removing the hierarchy of obligations would be detrimental to our primary sectors’ long-term sustainability and profitability.”</p>
Federated Farmers	<p>“At the heart of this matter, we identify two main areas of concern:</p> <ul style="list-style-type: none"> • A ‘pendulum shift’ over recent years to protecting environmental values over all other values;

	<ul style="list-style-type: none"> The failure of councils to adequately consult with, consider, and incorporate the values of <u>all</u> [emphasis in original] people and communities in society. <p>Our concern is that the proposed amendment removing the requirement to consider the hierarchy of obligations in resource consent processes does not go far enough. Federated Farmers would like to see the obligation (on councils) to give effect to the hierarchy of obligations in policy statements and plans also dropped, in favour of strong direction requiring a restoration of balance between environmental, economic, social and cultural well-being (i.e. the four well-beings)."</p>
Irrigation NZ	<p>"Interpretation of the current hierarchy by Regional Councils forces prioritising water health to the detriment of other essential activities, potentially stalling crucial water infrastructure developments and constraining water resource allocations.,,</p> <p>Recommendation: - Redraft the hierarchy to mandate balanced considerations in policy design and regional plans. This approach ensures that while water health remains a feature, it does not overshadow other critical human needs such as food production using water and access to safe drinking water."</p>
DairyNZ	<p>In practice, proving alignment with the hierarchy through a resource consent has proven prohibitive for consent applicants. The amendment will provide much needed clarity and efficiency...</p> <p>DairyNZ recognises the intent of Te Mana o te Wai and the associated environmental and cultural values the concept is seeking to deliver. Delivery is best achieved through empowerment of regional councils to work with tangata whenua and communities, rather than imposing values upon them...</p> <p>DairyNZ is developing a framework for a replacement to the NPS-FM which provides a rebalanced approach, focusing on the identification and delivery of environmental, human health and cultural outcomes. We welcome any opportunity to work with officials and elected representatives on this."</p>

Make a submission

The Ministry for the Environment is holding a public consultation on the changes, open until 11:59pm Sunday 27 July. Submissions must be made via [their online portal](#).

What this Briefing adds

- This Briefing provides a summary of the Government's key proposals regarding changes for national freshwater policy and an explanation of what these proposals mean for public health.
- It highlights the value of existing national freshwater policy's Te Mana o te Wai decision-making framework and national bottom lines (both of which the Government is proposing to remove) as well as their widespread support for these across local government, public health, environmental, planning, water services, and seafood sector, and iwi.
- It also highlights the narrow commercial interests who support weakening national freshwater policy.

Implications for policy and practice

- The Government has stated it wants to produce “enduring” national freshwater policy, but this is unlikely given that it is removing parts of policy developed over many years under National and Labour-led Governments, and that it is aligning itself only with a narrow group of commercial interests, notably some parts of the agricultural sector.
- It is more likely that these changes will lead to ongoing conflict, from community to court-level, increased uncertainty and vulnerability for councils, communities, landowners and businesses as well as the further degradation of the country’s stressed fresh waterbodies and drinking water sources.

Authors details

[Marnie Prickett](#), Research Fellow, Department of Public Health, University of Otago, Wellington

[Dr Mike Joy](#), Senior Research Fellow, School of Geography, Environment and Earth Sciences, Victoria University of Wellington

[Dr Marie Doole](#), Adjunct Research Fellow, School of Geography, Environment and Earth Sciences, Victoria University of Wellington, and Director of Mātaki Environmental

[Professor Simon Hales](#), Department of Public Health, University of Otago, Wellington

Appendix

On nitrate

Drinking water standards for nitrate (11.3mg/L nitrate-nitrogen) are exceptionally high in terms of what is needed to protect environmental health, being between 10 to more than 30 times higher than nitrate concentrations in aquifers in their natural states.²⁴ Most nitrate pollution in Aotearoa New Zealand comes from agricultural sources, fertilisers or livestock urine.²⁵

Additionally, nitrate is not treated by common municipal drinking water treatments and can take years to decades to improve due to the lag between the time nitrogen is applied to the soil and the time it takes for it to move through a hydrological system.

On attributes

Attributes are different measures of impacts on, or health of waterways as written in the National Objectives Framework in the National Policy Statement for Freshwater Management. Attributes are commonly presented as tables with numerical measures of contaminants (eg, nitrogen, phosphorus, sediment, E. coli) or health (eg, the Macroinvertebrate Community Index, which measures the make-up of an aquatic invertebrate community). Attribute tables can include a national bottom line.

Where a waterway has fallen below the bottom line, or risks falling below, councils are required to develop regional plans and local regulations that will improve the waterway over time to meet the bottom line.

References

1. New Zealand Government, Government takes first steps towards pragmatic and sensible freshwater rules. 2023. <https://www.beehive.govt.nz/release/government-takes-first-steps-towards-pragmatic-and-sensible-freshwater-rules>
2. Ministry for the Environment, Package 3: Freshwater – Discussion document. 2025: Wellington, NZ. p. 1-45. <https://environment.govt.nz/publications/package-3-freshwater-discussion-document/>
3. Stats NZ. Groundwater quality: Data to 2024. 2025 <https://www.stats.govt.nz/indicators/groundwater-quality-data-to-2024/>.
4. Moreau M, Herpe M, and Santamaria Cerrutti M, 2024 Update of the national groundwater quality indicator. 2025: Wairakei, NZ. <https://environment.govt.nz/publications/2024-update-of-the-national-groundwater-quality-indicator/>
5. Julian JP, de Beurs KM, Owsley B, Davies-Colley RJ, Ausseil A-GE. River water quality changes in New Zealand over 26 years: response to land use intensity. *Hydrology and Earth System Sciences*. 2017;21(2):1149-71. <https://doi.org/10.5194/hess-21-1149-2017>
6. Dench WE, Morgan LK. Unintended consequences to groundwater from improved irrigation efficiency: Lessons from the Hinds-Rangitata Plain, New Zealand. *Agricultural Water Management*. 2021;245:106530. <https://doi.org/10.1016/j.agwat.2020.106530>
7. Prickett M, Chambers T, Hales S. When the first barrier fails: public health and policy implications of nitrate contamination of a municipal drinking water source in Aotearoa New Zealand. *Australasian Journal of Water Resources*. 2023:1-10. <https://doi.org/10.1080/13241583.2023.2272324>
8. Prickett M, Joy MK. Aotearoa New Zealand's new Government proposal to remove hard-won protection for waterways will worsen the country's freshwater crisis. *Inland Waters*. 2024:1-20. <https://doi.org/10.1080/20442041.2024.2335738>
9. Joy MK, Canning AD. Shifting baselines and political expediency in New Zealand's freshwater management. *Marine and freshwater research*. 2021;72(4):456-61. <https://www.publish.csiro.au/mf/mf20210>
10. Death R, Canning A, Magierowski R, Tonkin J. Why aren't we managing water quality to protect ecological health. In *Farm Environmental Planning—Science, Policy and Practice*. Massey University, New Zealand. 2018;31. https://www.massey.ac.nz/~flrc/workshops/18/Manuscripts/Paper_Death_2018.pdf
11. New Zealand Government. Govt announces next stage of freshwater reforms, 2013. <https://www.beehive.govt.nz/release/govt-announces-next-stage-freshwater-reforms>
12. McNeill J. Regional council legitimacy in the 2022 local government elections. In: McNeill J, Cheyne C, editors. *Candidates, voters and voting in New Zealand's 2022 local government elections*. Palmerston North, NZ: Titipounamu Press; 2023. p. 46-54. <https://mro.massey.ac.nz/server/api/core/bitstreams/3c15683f-f284-4bf3-a68b-a381040b6f0c/content#page=54>
13. Ulucanlar S, Lauber K, Fabbri A, Hawkins B, Mialon M, Hancock L, et al. Corporate Political Activity: Taxonomies and Model of Corporate Influence on Public Policy. *International Journal*

of Health Policy and Management.

2023;12:7292. <https://dx.doi.org/10.34172/ijhpm.2023.7292>

14. Doole M, Stephens T, Bertram G. Navigating Murky Waters: characterising capture in environmental regulatory systems. *Policy Quarterly*. 2024;20(4):44-53. <https://dx.doi.org/10.26686/pq.v20i4.9634>
15. Doole M, Stephens T. Drain the Swamp to Save the Swamp: mitigating capture in environmental regulatory systems. *Policy Quarterly*. 2025;21(1):21-32. <https://dx.doi.org/10.26686/pq.v21i1.9712>
16. Ministry for the Environment. Resource Management (Freshwater and Other Matters) Amendment Bill. 2024. <https://environment.govt.nz/acts-and-regulations/acts/resource-management-freshwater-and-other-matters-amendment-bill/>.
17. Ministry for the Environment, Departmental Report: Resource Management (Freshwater and Other Matters) Amendment Bill. 2024: p. 1-90. https://www.parliament.nz/en/pb/sc/submissions-and-advice/document/54SCPRIP_ADV_25161950-a4fc-47b4-ada3-08dc7ab031fe_PRIP6535/ministry-for-the-environment-departmental-report
18. Ministry for the Environment, Regulatory Impact Statement: Excluding the hierarchy of obligations within the National Policy Statement for Freshwater Management from resource consenting. 2024: Wellington, NZ. p. 1-23. <https://environment.govt.nz/assets/publications/regulatory-impact-statement-for-freshwater-rm-amendment-bill.pdf>
19. Federated Farmers. Federated Farmers Position on a Revised NPSFM. 2024. p. 1-4. [phcc.org.nz/sites/default/files/2025-07/Federated Farmers Position on a Revised NPSFM.pdf](https://phcc.org.nz/sites/default/files/2025-07/Federated_Farmers_Position_on_a_Revised_NPSFM.pdf)
20. DairyNZ, Freshwater Farm Plans A Practical Way Forward. 2024. p. 1-7.. <https://www.phcc.org.nz/sites/default/files/2025-07/DNZ%20Letter.pdf>
21. Bradley A. Minister Andrew Hoggard's sister lobbied him opposing tougher baby formula rules. Radio New Zealand, 2025. <https://www.rnz.co.nz/news/in-depth/557200/minister-andrew-hoggard-s-sister-lobbied-him-opposing-tougher-baby-formula-rules>
22. Federated Farmers PM joins Feds tour to boost farmer confidence. Farmers Weekly, 2024. <https://www.farmersweekly.co.nz/politics/tour-launched-to-boost-farmer-confidence/>
23. Waiwiri-Smith, L. Fonterra boss nabbed science and tech advisory role after texting PM. 2025. <https://thespinoff.co.nz/politics/25-06-2025/fonterra-boss-nabbed-science-and-tech-advisory-role-after-texting-pm>
24. Daughney C, Wall M. Groundwater quality in New Zealand: state and trends 1995-2006. GNS Science consultancy report. 2007;23.
25. Rogers KM, van der Raaij R, Phillips A, Stewart M. A national isotope survey to define the sources of nitrate contamination in New Zealand freshwaters. *Journal of Hydrology*. 2023;617:129131. <https://doi.org/10.1016/j.jhydrol.2023.129131>

