

Report No.	20-120
<b>Decision Required</b>	

## IMPLEMENTATION OF GOVERNMENT'S FRESHWATER REFORM PACKAGE

### 1. PURPOSE

- 1.1. To inform Council of the release of the Government's freshwater reform 'Action for Healthy Waterways' package and outline the proposed approach to implementation in the Horizons Region.

### 2. EXECUTIVE SUMMARY

- 2.1. On 3 August 2020 the Minister for the Environment and the Minister of Agriculture jointly released the full details around Government's 'Action for Healthy Waterways' package: a suite of freshwater policy reforms aimed at more rapid improvements to freshwater quality in New Zealand. The package includes changes to the **Resource Management Act 1991 (RMA)**, a new **National Policy Statement on Freshwater Management (NPS-FM)**, **National Environmental Standards for Freshwater (NES-FW)**, stock exclusion regulations, and regulations in relation to the measurement and reporting of water takes.
- 2.2. **Horizons Regional Policy Statement (RPS)** and Regional Plan (collectively referred to as the One Plan) set out an integrated management framework for management of the environment. The One Plan became fully operative in December 2014 and the RMA requires that regional plans are reviewed every ten years. Council must notify changes to the One Plan to implement the NPS-FM by December 2024.
- 2.3. In its development, the One Plan was a significant step change in managing environmental issues. However, the policy drivers that underpin the NPS-FM require that we not only manage within environmental limits, but that we halt the further degradation of water quality – with a key focus on ecosystem health and Te Mana or te Wai. Implementation of the NPSFM will require retooling of our current policy settings in the One Plan. This includes consideration of the nature and scale of land use activities, the use of freshwater across the region, and the potential for activities to be complementary to natural systems.
- 2.4. Planning and implementation of Government's reform package is underway. There is much to be done to deliver this package within the ambitious timeframes set. Where possible, resourcing required to support the initial stages of implementation is being sought from existing budgets, largely through re-prioritisation of other activities. There is however, a need for more immediate policy and planning support that is not able to be accommodated due to resources being allocated to the Plan Change 2 process.
- 2.5. In addition to endorsement of our proposed approach, the project team is seeking Council's support for additional funding of \$200,000 from general rate reserves for the 2020-21 financial year. This funding will provide us with the necessary policy, community engagement and project support to enable us to undertake the first phase of iwi and community engagement as part of the NPS-FM values and limit setting process.
- 2.6. Government's timelines mean that work must begin in the current financial year if Horizons is to have any chance of meeting the 2024 deadline for notifying changes to the One Plan.
- 2.7. Discussions with Council around the funding of these activities through Horizons' Long-term Plan 2021-31 (LTP) are now underway. Broadly, the cost of implementation is estimated to be over \$10M and up to \$15M over three-four years. This includes resourcing for science and policy, as well as iwi capacity and advice and community engagement.

- 2.8. The freshwater reform package, while requiring a significant shift in Horizons' business, presents a range of opportunities – from fostering relationships and supporting capacity-building, to fast-tracking freshwater improvement via Government's complementary 'Jobs for Nature', through to the delivery of a suite of new policy and planning provisions that provide for a range of community outcomes. This is a step-change in Horizons' activities, but it is a step-change that has the potential to deliver positive outcomes for the environment and community wellbeing.

### **3. RECOMMENDATION**

That the Committee recommends that Council:

- a. receives the information contained in Report No. 20-120 and Annex.
- b. endorses the proposed approach and implementation programme outlined in this report.
- c. approves additional expenditure of up to \$200,000 to support the first year of the implementation programme. This budget is approved to be from general rate reserves, with expenditure to occur over the 2020-21 financial year.

### **4. FINANCIAL IMPACT**

- 4.1. Planning and implementation of Government's reform package is already underway. Where possible, resourcing required to support the initial stages of implementation is being sought from existing budgets, largely through re-prioritisation of other activities.
- 4.2. There is however, a need for more immediate policy and planning support that is not able to be accommodated due to resources being allocated to the Plan Change 2 process. The project team is seeking Council's support for additional funding of \$200,000 from general rate reserves for the 2020-21 financial year. This funding will provide us with additional policy and administrative support to enable us to embark on the first phase of iwi and community engagement as part of the NPS-FM values and limit setting process.
- 4.3. Discussions with Council around the funding of these activities through Horizons' Long-term Plan 2021-31 (LTP) are now underway. Broadly, the cost of implementation is estimated to be over \$10M and up to \$15M over three-four years. This includes resourcing for science and policy, as well as iwi and community engagement.

### **5. CLIMATE CHANGE IMPACTS**

- 5.1. This work has the potential to contribute directly to Horizons' climate change response, initially by raising awareness through community discussions around long-term vision and values for freshwater, and more directly as a result of objective and limit-setting and/or action planning.
- 5.2. Climate change will inevitably form a part of these community discussions and will need to be accommodated within the science and modelling undertaken to inform these discussions.

### **6. COMMUNITY ENGAGEMENT**

- 6.1. Initial engagement with iwi is underway, following an invitation from Horizons to meet and discuss a range of topics of interest, including freshwater and other organisational priorities (e.g. climate change). Since extending the invitation in July staff have met with representatives of Rangitāne o Manawatū, Ngā Puna Rau Rangitikei (Ngāti Whitikaupeka, Ngāti Tamakōpiri, Ngai Te Ohuake, Ngāti Hauiti and Ngāti Apa), and Ngā Tangata Tiaki o Whanganui. Further hui are planned with other iwi across the region. We acknowledge that

these are preliminary discussions and that further conversations will be critical. We look forward to meeting with other iwi throughout the region in due course.

- 6.2. Staff are also engaging with primary sector representatives and other stakeholders, with the more immediate requirements for land owners in relation to the NES-FW and regulations being a key focus of these discussions. A key first step is assessing the requirements of Government's reform package with the One Plan. We are also working with our regional council counterparts and relevant agencies such as MfE, MPI and industry groups to ensure consistent advice is provided, where possible.
- 6.3. Public information about Horizons' implementation programme will be made available via a dedicated freshwater section on Horizons' website. The community will have the opportunity to share their thoughts on our proposed work programme through the LTP consultation process.

## **7. SIGNIFICANT BUSINESS RISK IMPACT**

- 7.1. Resource management issues, particularly freshwater issues, attract public interest and this is reflected in the number of submissions received by Government. Because of the complex nature of freshwater management there is often a lack of consensus around solutions or approaches.
- 7.2. The reform package introduces new legislative requirements in relation to the management of freshwater, one of Council's organisational priorities. Horizons, along with other local authorities, is responsible for implementing the new NPS-FM, NES and regulations. We acknowledge that there are significant costs associated with successfully implementing these changes.
- 7.3. Relationships with central and local government, iwi, stakeholders, and the community are crucial to implementation. There is an opportunity to continue to grow and develop critical relationships, and increase community confidence if this process is successful. Iwi participation is key, and there are clear expectations set out in the framework that provide for this.
- 7.4. Failure to adequately plan for and/or implement this package will introduce a range of risks to Council, from operational (e.g. inability to deliver on our obligations leading to legal and compliance risks) through to strategic (e.g. failure to achieve our organisational priorities) and political (e.g. loss of ministerial confidence and reputational risk). Resourcing, coordination, relationships, and availability of expertise are key risk areas in our ability to meet our obligations.

## **8. BACKGROUND**

- 8.1. On 3 August 2020 the Minister for the Environment and the Minister of Agriculture jointly released the full details around Government's 'Action for Healthy Waterways' package: a suite of freshwater policy reforms aimed at more rapid improvements to freshwater quality in New Zealand. The package includes a new National Policy Statement on Freshwater Management (NPS-FM), National Environmental Standards for Freshwater (NES-FW), stock exclusion regulations, and regulations relating to the measurement and reporting of water takes. Further detail around these reforms is provided below.
- 8.2. A key part of implementation is aligning the new requirements with Horizons' Regional Policy Statement (RPS) and Regional Plan (collectively referred to as the One Plan) set out an integrated management framework for management of the environment. The One Plan became fully operative in December 2014 and the RMA requires that regional plans are reviewed every ten years. Council must notify changes to the One Plan to implement the NPS-FM by December 2024.

- 8.3. Given the 'mountains to sea' approach of the NPS-FM, we anticipate that a number of different sections of the One Plan will need to be considered as part of this review. This includes policy and planning provisions relating to Te Ao Māori, water, land, and coast, as well as aspects of indigenous biological diversity (particularly in relation to wetlands) and contaminated land. This means that engagement with the community around a wide range of activities relating to freshwater will be necessary as part of our NPS-FM implementation.

### **National Policy Statement for Freshwater Management**

- 8.4. In a nutshell, the NPS-FM directs regional councils, in consultation with their communities, to set objectives for the state of fresh water bodies in their regions and to set limits on resource use to meet these objectives. This applies to all freshwater (including groundwater) and to any receiving environments affected by freshwater (for example, estuaries and the wider coastal marine area).
- 8.5. Councils must give effect to Te Mana o te Wai, and adopt an integrated approach that recognises the interconnectedness of the environment – from mountains to sea. We must actively involve iwi and hapū (to the extent that they wish to be involved) in decision-making and the management of fresh water. This includes identifying Māori freshwater values, and (along with the wider community) setting long-term visions for freshwater.
- 8.6. Te Mana o te Wai, as described in the NPS-FM, encompasses six principles relating to the roles of tangata whenua and the community in freshwater management, both now and into the future. These are described as:
- '*Mana whakahaere*' – the power, authority, and obligations of tangata whenua to make decisions that maintain, protect, and sustain the health and well-being of, and their relationship with, freshwater, '*Kaitiakitanga*' – the obligation of tangata whenua to preserve, restore, enhance, and sustainably use freshwater, and '*Manaakiatanga*' – the process by which tangata whenua show respect, generosity and care for freshwater and for others.
  - '*Governance*' refers to the responsibility of those with decision-making powers (including Horizons) to prioritise the health and well-being of freshwater.
  - '*Stewardship*' and '*Care and respect*' refer to the obligation and responsibility of all New Zealanders to manage and care for freshwater in a way that sustains present and future generations and provides for the health of the nation.
- 8.7. The NPS-FM sets out the 'hierarchy of obligations' in Te Mana o te Wai that prioritises:
- a) first, the health and well-being of water bodies and freshwater ecosystems
  - b) second, the health needs of people (such as drinking water)
  - c) third, the ability of people and communities to provide for their social, economic and cultural well-being, now and in the future.
- 8.8. The NPS-FM is clear that councils must use the best information available and take all practicable steps to reduce uncertainty. Decision-making cannot be delayed on the basis of incomplete data and information, or uncertainty about the robustness of this information. A key first step is ensuring we have sufficient data and information support within Horizons to collect, process and share information in a timely way.
- 8.9. There are specific requirements for those councils who share jurisdiction over a catchment to work together to implement the NPS-FM, and co-operate in the integrated management of the effects of land use and development. This means that we will be working with territorial authorities throughout the region
- 8.10. The NPS-FM 2020 introduces an expanded national objectives framework that includes two additional compulsory values: 'threatened species' and 'mahinga kai', in addition to 'ecosystem health' and 'human health for recreation'. Councils must develop plan objectives that describe the environmental outcome sought for all values (including an

objective for each of the five individual components of ecosystem health). The revised NPS-FM includes:

- 22 attributes for rivers and lakes, including new ecosystem health attributes for fish index of biotic integrity (IBI), sediment, macroinvertebrates (MCI and QMCI), dissolved oxygen, ecosystem metabolism and submerged plants in lakes.
- National bottom lines for the ammonia and nitrate toxicity attributes now seek to protect 95% of species from toxic effects (up from 80%).

Action plans and/or limits on resource use will need to be set by Council to achieve the full suite of (22) attributes.

- 8.11. While it was the subject of debate, presently Government has chosen not to include national bottom lines for dissolved inorganic nitrogen (DIN) or dissolved reactive phosphorus (DRP), as consulted on. There is however, a requirement to manage these attributes as they relate to periphyton and other ecosystem health attributes, and to provide for the health of downstream ecosystems.
- 8.12. With regard to timing, every local authority must give effect to the NPS-FM as soon as reasonably practicable, and regional councils must notify any changes to their regional policy statements and regional plans to give effect to the NPS-FM by December 2024.

### **National Environmental Standards for Freshwater (NES-FW)**

- 8.13. The NES-FW sets out regulations for activities that pose risks to freshwater and freshwater ecosystems. Regulations apply to:
- intensive agricultural land use (as a temporary measure to the end of 2024);
  - the use of feedlots and other stockholding areas (from winter 2021);
  - intensive winter grazing of forage crops (from winter 2021);
  - the application of synthetic nitrogen fertiliser to pastoral land (from 1 July 2021);
  - the construction or use of in-stream structures that affect fish passage; and
  - vegetation clearance, sphagnum moss harvesting, and disturbance of wetlands.
- 8.14. In many cases, people will need a resource consent from Horizons before carrying out these activities. In some cases, activities are permitted subject to certain conditions (meaning they do not require a resource consent). It is important to note that while a permit may not be required, there are still associated services that Horizons will need to provide (e.g. data and information collection/verification, or provision of advice/information). Where there are requirements for monitoring, the regulations enable local authorities to charge for this in accordance with Section 36 of the RMA.
- 8.15. Work is underway to assess the requirements of the new NES-FW with Horizons' One Plan so that greater clarity can be provided to land owners, and resourcing requirements better understood. To date, the anticipated workload for the regulatory team is being assessed as we become familiar with the NES-FW. However, we are anticipating a significant increase in staff resource in both consent and compliance to meet the expected increase in workload as the NES-FW is implemented. This workload will not merely be related to the processing and monitoring of resource consents and permitted activities, but will also be related to providing advice to different parties and groups on how Council is implementing the NES-FW.

### **Stock Exclusion Regulations**

- 8.16. New stock exclusion regulations came into force from 3 September 2020, but have been phased in over time. The aim of the regulations is to reduce the impact of damage to our waterways from livestock, protect freshwater and increase the suitability of use of New Zealand's waterways for recreation and food gathering.

- 8.17. Broadly these rules prohibit the access of dairy and beef cattle, pigs, and deer to waterways. The regulations do not apply to sheep. Requirements include:
- Dairy cattle, dairy support cattle, and pigs must be excluded from the water bodies regardless of the terrain.
  - Beef cattle and deer must be excluded from the water bodies regardless of terrain if they are break-feeding or grazing annual forage crops or irrigated pasture. Otherwise, the requirements apply to beef cattle and deer only on mapped low slope land (defined as “less than 10 degrees slope”), as shown on the Ministry for the Environment’s [website](#).
  - A minimum setback of 3 m from the edge of a lake or river more than 1 m wide, unless there is a permanent fence in place on 3 September 2020, or a 5 m setback if stock are intensively grazing.
  - A minimum setback of 3 m from a wetland >0.05 ha.
  - Stock, except deer, may only cross a river or lake by using a dedicated bridge or culvert, unless they cross no more than twice in any month.
- 8.18. Work is underway to assess the requirements of the new NES-FW with Horizons’ One Plan so that greater clarity can be provided to land owners, and resourcing requirements are better understood. As noted above work is being undertaken to assess the regulatory resource and workload requirements in this area. However, it is expected that Council will have to have programmes in place to monitor compliance with the regulations and information systems to support the regulatory business, including document management, compliance monitoring recording and programme reporting.

### **Measurement and Reporting of Water Takes**

- 8.19. Regulations for the measurement and reporting of water takes came into force from 3 September 2020. These regulations require permit holders to measure their water use every 15 minutes and electronically submit these records to Horizons every day. The regulations apply to water takes of 5 litres per second or more, and are phased in over time:
- 3 September 2022 for a water permit  $\geq 20$  l/s
  - 3 September 2024 for a water permit  $\geq 10$  l/s but  $< 20$  l/s
  - 3 September 2026 for a water permit  $\geq 5$  l/s but  $< 10$  l/s
- 8.20. Horizons currently collects records of water use for the majority of the region’s permitted water takes  $\geq 5$  l/s however, these measurements are generally recorded hourly rather than at 15 minute intervals.
- 8.21. Under the new regulations we are also required to account for unconsented water use (including those takes operating as Permitted Activities under the One Plan). Horizons has previously carried out assessments of permitted water use for both surface water and groundwater and will be reviewing current methods available to model or estimate this use.
- 8.22. While there are some changes to Horizons’ water metering and water use reporting arising through the new regulations – and that we will, in time, make changes to the collection and reporting of these data to align with national requirements – we do not anticipate these regulations to have a significant impact on existing business when compared with other aspects of the package.
- 8.23. We do, however, anticipate an increase in information management and consents monitoring activities will be necessary to meet our obligations under the new regulations.

### **Other Requirements**

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- 8.24. Over the next 12 months or so, Government has indicated it will be working with regional councils and primary sector groups to develop new regulations that will set out the requirements for freshwater modules in farm plans.

## 9. DISCUSSION

- 9.1. There is a significant body of work required to implement this package. Staff are in the process of developing an implementation plan and accompanying 'roadmaps' which set out the blocks of work necessary to implement the Action for Healthy Waterways package. Identified work streams that set out broad areas of work span science, policy and Te Ao Māori. A draft of Horizons' NPS-FM implementation roadmap is appended (Annex A) to this Council report.
- 9.2. In developing our proposed approach, we remain cognisant of: existing policies and planning documents including Horizons' One Plan; new requirements (including legislative requirements) set out in the 'Action for Healthy Waterways' package; Horizons' strategic priorities (freshwater, climate change, information management and biodiversity); and previous and current consultation with iwi and communities around 'Our Freshwater Future' and Plan Change 2.
- 9.3. In its development, the One Plan was a significant step change in managing environmental issues. However, the policy drivers that underpin the NPSFM require that we not only manage within environmental limits, but that we halt the further degradation of water quality – with a key focus on ecosystem health. While the NPSFM is not designed to limit growth, its implementation will require retooling of our current policy settings in the One Plan. This includes consideration of the nature and scale of land use activities, the use of freshwater across the region, and the potential for activities to be complementary to natural systems.

### NPS-FM Implementation Programme

- 9.4. The NPS-FM specifically states six principles of Te Mana o te Wai relating to the roles of tangata whenua and other New Zealanders in the management of freshwater which must be accommodated within our approach. There is also a wider set of principles and aspirations that underpin our proposed approach to implementation:
- We aim to notify plan changes to fully implement the NPSFM, and address issues with our nutrient management framework, prior to December 2024.
  - Plan structure will largely be determined by the National Planning Standards. Implementation of the Standards, along with s79 plan review requirements.
  - Outcomes and interventions (and therefore evidence and policy evaluation) need to be considered at FMU scale. We have provisionally identified seven FMUs across the region, corresponding to large catchment areas (as shown in Annex B).
  - Where possible, we will look to develop regionally consistent tools that can be applied according to local conditions and community aspirations.
  - We anticipate that planning and community engagement processes will run at a regional scale, in light of time and resource constraints. The form and depth of community engagement may, however, vary across the region.
  - Working with iwi / hapū and giving effect to Treaty settlements will be especially important in the process. Horizons will also need to seek expertise from iwi / hapū in relation to Te Mana o Te Wai.
  - While the focus of this process is on meeting our statutory obligations in relation to fresh water, it should where possible pave the way for Council's longer-term aspiration of catchment-scale co-governance.

- 9.5. The roadmap identifies five phases of community consultation that will be rolled out from early 2021 through to 2024 to:
- identify FMUs and community values for each of these FMUs;
  - set environmental outcomes for each of these values and include them as objectives in the One Plan;
  - identify attributes (measures) for each value;
  - set baseline and target attribute states, environmental flows and levels, and other criteria to provide for values and outcomes;
  - set limits as rules and prepare action plans to achieve environmental outcomes; and
- 9.6. We are also required to monitor water bodies and freshwater ecosystems and take action if degradation is detected.

### **Implementation of the NES-FW and Regulations**

- 9.7. The size, scale and speed by which the NES-FW has to be implemented means that Horizons, along with other Councils will endeavour to take a co-ordinated response to regulatory implementation. An implementation process is currently being discussed with officials from MfE and MPI.
- 9.8. How this will work is currently being considered by the sector, however some areas of focus may include sector wide information on matters such as guidance on interpretation of some of the qualitative standards in the regulations and a consistent approach to compliance implementation, utilising the Engage, Enable, Educate and Enforce (4 E) model recommended by the Ministry for the Environment.

### **Communications plan**

- 9.9. Two substantial communications plans are currently being developed:
- The first includes working with Horizons' science, policy, consents, compliance and rural advice teams on developing key messages and collateral needs to help inform and educate landowners about the NES-FW and regulations. This includes timeframes of when particular regulations come into effect and Horizons' implementation plan, as well as our non-regulatory work that can assist landowners' planning for giving effect to the requirements.
  - The second communications plan will consider effective ways our communities can engage with the NPS-FM and associated Plan Change Process over the course of the next four years. This includes consultation on FMUs and their values, outcomes, attributes and objectives, target attribute states, limits and/or action plans, Proposed Plan Change(s), and Plan notification.
- 9.10. Given the significant business and financial impact implementing the Action for Healthy Waterways package will have, 2021-31 Long-term Plan pre-engagement is an important consideration for any communication.
- 9.11. We anticipate that planning and community engagement processes will run at a regional scale, in light of time and resource constraints. The form and depth of community engagement may, however, vary across the region. Treaty settlements will be especially important in determining what is locally appropriate.
- 9.12. A combination of channels will be considered to ensure we reach as many of our audiences as possible. This will include, but is not limited to, face to face meetings/forums and presentations, Horizons' website and social accounts, electronic and printed newsletters, media, and community engagement tools such as Social Pinpoint.



- 9.13. Connection with communications teams across relevant central government agencies, the regional council sector, iwi, and industry groups is crucial to ensuring information is consistent and delivered in a timely and accessible way to those who need it. This includes internal communication to ensure Horizons' staff and governance are well informed.

## **10. COMMENT**

### **Special provisions for horticulture in Horowhenua**

- 10.1. The Government has confirmed special provisions for areas of Pukekohe and Horowhenua, where the growing of fresh vegetables contributes significantly to national supply. These provisions enable councils and communities to maintain water quality below some national bottom lines, while ensuring that improvements to water quality are made. These provisions expire after ten years, and potentially earlier if a legally-binding solution for these areas can be found, for example through the development of a new regional plan.
- 10.2. The Minister for the Environment has acknowledged that water quality needs to improve substantially in these catchments, and states that "Government will be working with councils and relevant iwi and hāpu so that contaminant loads can be reduced and bottom lines met over time, while safeguarding the domestic supply of vegetables".

## **11. CONSULTATION**

- 11.1. Initial consultation with the community around our long-term vision and values is scheduled for early 2021. There is much work to be done between now and February 2021 to inform these discussions. This includes an assessment of One Plan alignment with NPS-FM values, and completion of the catchment stocktake reports. We also need to establish frameworks and systems to capture community and iwi values and supporting information/knowledge.
- 11.2. The community will also have the opportunity to share their thoughts on our proposed work programme (beyond 2020-21) through the LTP consultation process.
- 11.3. It is not envisaged that the implementation programme will have a significant impact on Horizons' PC2 process, given it is well-advanced and limited in scope.

## **12. TIMELINE / NEXT STEPS**

- 12.1. The Chair and staff continue to engage with the Regional Sector Water sub-group, and contribute to other discussions with Government around freshwater management. We understand that detailed guidance is being developed by MfE in consultation with regional council representatives.
- 12.2. As outlined above, two communications plans are in development, and will be progressed in coming weeks as we work through the details of Government's freshwater package.
- 12.3. The draft roadmap for NPS-FM implementation is attached (Annex A) to this Council report and sets out the next steps for this work programme. Initial community engagement within the current financial year will focus on vision and values, with discussions scheduled for early 2021. Work is currently underway to establish key relationships and contacts with interested parties, including iwi, territorial authorities, stakeholders and community groups.
- 12.4. Staff are currently working on a similar plan for the new NES-FW and regulations, with a view to providing clear advice and guidance to the community around our approach to implementation.

## **13. SIGNIFICANCE**

- 13.1. It is clear that in its entirety, this work programme will be of public interest, and of a size and scale that is significant for Horizons. While we are seeking Council's endorsement of

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the proposed approach, our expectation is that decision-making will occur following consultation with the community through Horizons' long-term planning process.

- 13.2. This work is being undertaken to meet our obligations under the Resource Management Act 1991, which is excluded from Horizons' Significance and Engagement Policy. For 2020-21, additional resourcing sought is in the order of \$200,000 and intended to be drawn from general rate reserves. Accordingly the staff view is that this is not a significant decision according to the Council's Policy on Significance and Engagement.

Abby Matthews

**SCIENCE AND INNOVATION MANAGER**

Nic Peet

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## **ANNEXES**

A NPS-FM Implementation Roadmap - FINAL DRAFT