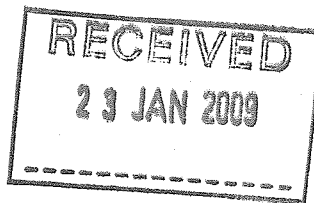


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23 January 2009

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The Administration Officer- Board of Inquiry- Water

**Submission on the Ministry for the Environment's draft policy on freshwater management.**

I would like to be heard in Christchurch in support of my submission.

Thankyou for the chance to comment on this important statement. It is essential, I think, in such times of escalating demand, rapidly emerging science and international interest in resource- and biodiversity-management, to have a strong national policy on freshwater environments. I appreciate the draft statement's support for integrated management of freshwater resources and its support for flexibility in means to goals. In a general sense, however, I feel that, in its current form, this statement will be insufficient to protect freshwater environments from existing and ongoing harm.

While the preamble mentions freshwater's 'crucial underpinning of important parts of biodiversity' and Objective 4 talks about freshwater's 'life-supporting capacity', nowhere is it explicitly stated that 'freshwater resources' are not just water but are complicated environments supporting many plants, birds, fish, microorganisms and so on, or that human existence is linked in; how humans, as living organisms, live as part of, and depend upon, fully-functioning freshwater ecosystems for continued existence (not just swimming!).

Moreover, nor does the statement mention responsibility for looking after our freshwater resources; I believe that as citizens of this country, we have a duty of care, to value and nurture all such ecosystems.

The Ministry for the Environment should be advocating for the environment and I would very much like to see, with clarity, throughout this statement, that the Ministry is certain in its belief in this role. The draft statement gives me cause for concern because it appears to be bending over backwards to accommodate activities that are advocated for in many other forums, such as 'Land-use Development' (spoken for by many business groups, not least Federated Farmers), and uses language of compromise such as 'manage' and 'control' when talking about demand for and degradation of freshwater resources, for example, in Objectives 2, 5 and 6.

I would like to propose the development of guiding principles from which details and action plans can be drawn. In my view, these four are uppermost:

1. That as New Zealanders, we have the responsibility of active guardianship over all parts of our natural environment.
2. That all freshwater resources remain in public hands.
3. That freshwater standards be set at ecological levels, nationwide.
4. That land use be appropriate to land type.

Additionally, I would like to suggest the thorough investigation of introducing a requirement of strict liability insuring for commercial freshwater use. This will do much to ensure that the use of freshwater and land are appropriate.

Lastly, I believe that 2035 is a goal too far; the lassitude of the aim is a mismatch for the urgency of the need, whole ecosystems could disappear while New Zealanders wait, and, simply, we can do better.

J. R. Finlayson.