

**From:** [REDACTED]  
**To:** [Water Consultation Submissions](#)  
**Subject:** Nobody owns water- Yeah right!  
**Date:** Friday, 15 April 2016 3:28:58 p.m.

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Dear MFE

The premise in NZ "that nobody owns water" is exactly that and is not borne out by actual fact or practice. In fact the current situation has all the elements of the parable "the Emperor's new clothes" where everyone knows that the Emperor is naked. The reality is that without water, land has minimal value and therefore, water that is used to create production must have a value. For this resource to be used equitably and to enable new users to enter the market for a share to use water (productively and efficiently) means that as a public resource, a rental is owed for its use when these benefits accrue privately. The points below are the same as those made by the Gareth Morgan Foundation and since I can fault none of them, they should all be considered. They are:

1. The Government must implement all recommendations of the Land and Water Forum, otherwise this attempt at collaboration will be seen as a sham and ultimately abandoned.
2. There must be a move to greater national coordination.
3. The biggest issue in the document is the lack of progress on water ownership and pricing. This is disappointing – while allow trading is a good idea, we need to recognise that the rights to use water are owned (via consents) and any trading should be implemented in tandem with a resource rental on the owners of water use consents.
4. The bottom line should still contain an aspiration of swimmability unless communities transparently decide otherwise – even the current bottom lines have exceptions.
5. It is good that each catchment will have to be maintained or improved, but the bands used are too broad and could allow for considerable slippage in some catchments while still claiming they are being "maintained". On a related note, Good Management Practice will only apply for catchments at or near full allocation – but if we implement the intent of maintain or improve all catchments are fully allocated.
6. We welcome the inclusion of the Macroinvertebrate Community Index.
7. We welcome the progress on stock exclusion but the timeframes are too long and more urgent action is needed.
8. We support the use of cost recovery from consent holders but believe this should be broadened to include a resource rental to pay for fresh water clean ups.
9. We support the inclusion of Iwi in consultation and note that Iwi values are very close to those of the New Zealand public on swimmability and food gathering. Iwi rights over water also need to be resolved as part of the general issue of water ownership.
10. Funding for freshwater improvement should not be used to subsidise irrigation, at least until the externalities of intensive farming and water extraction have been dealt with by appropriate pricing.

Regards

Peter Carey

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