

Freshwater Consultation 2016

Next Steps for Freshwater Submission

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1. Water Quality Standards

DISAGREE with the National Bottom Line. This should be that all waterways are swimmable. It is noted in the narrative that it is suggested that natural events, eg floods, render this not achievable. That suggestion is a nonsense; the National Bottom Line (swimmable) could be added to explain that the standard is to apply at MALF or similar minimum flow level

AGREE with the use of the Macro Invertebrate Index (MCI) as a compulsory measure of water quality, as it not only covers in-stream health but also sediment levels, which inhibit the production of invertebrates and trap pollutants. SUGGEST a high level of MCI health be adopted as the standard

DISAGREE with the ability for any water ways to fall below the (current) National Bottom Line and be listed in Appendix 4. That is an indictment on our ability to manage the life giving nature of water

AGREE with the concept of Freshwater Management Units (FMU)

DISAGREE with the concept of Local communities being allowed to vary the standards for FMU, and also DISAGREE with the idea that one FMU can be traded off against another to allow lower standards. Each water way must stand on its own.

DISAGREE with the concept of allowing stock to invade waterways at slopes of >15 degrees. Stock degradation of river banks and feeder streams are a primary source of sediment which traps pollution and inhibits stream health. Any competent fencer can fence at above that slope level

RECOMMEND that all fencing of waterways be at the extent of the marginal strip rather than on the edge of the waterway. This will allow for adequate natural development of buffer strips, inhibition of flood damage, and allow public access. It is also clear that the land within marginal strips is not owned by the neighbouring landowner but is the property of the Crown, and the neighbouring landowner has no legal right to fence in a marginal strip, in the same way that road reserve cannot be limited by fencing. Fencing of marginal strips by landowners so they can graze them is an illegal activity but is widespread.

RECOMMEND that the fencing of all waterways that do not have a marginal strip be done as if a marginal strip existed.

RECOMMEND that a priority in fencing waterways be allocated to those streams that are important for fish spawning and community drinking water supply

AGREE that wetland fencing be compulsory with particular attention paid to wetland gullies inhabited by snow tussock due to their water retention qualities

ECONOMIC USE AND OVER ALLOCATION

AGREE that all users be required to measure and report their usage through water meters

RECOMMEND that no economic use is allowed until minimum flows for recreational and community use are established

RECOMMEND that Government recognises throughout water policy that water flows (quantity) are as important as water quality

RECOMMEND that in addition to the use of percentage of MALF a further measure called the Expert Angler Assessment (Cawthron Institute development) be applied to determine minimum flows. The current system for establishing minimum flows and Supplementary minimum flows means that water ways can be unusable for recreation for extended periods of time

RECOMMEND the Government recognise the economic value of waterways recreation to the National Economy through domestic and international tourism

RECOMMEND the Government, in recognising economic value of waterways in their natural state before extractive industries takes, also assesses both direct economic benefit plus the inferred benefit of recognition of New Zealand as a land of clean water

RECOMMEND that to deal with the effects of over allocation Government introduces requirements for Councils to assess;

- where irrigation water can best be obtained without disturbing overall water way quantity and quality, and encourage/facilitate takes from those location instead of vulnerable waterways
- assess waterways where minimum flows are likely to regularly occur and limit allocation from those water ways so that higher levels of flow are maintained

In making these recommendations I am aware Councils do not take an holistic view of the water resource within their area but merely respond to local demand for resource consents

- require water users to create and maintain water storage of a minimum of 12 weeks (and higher in drier areas) supply for use at times of low flow; and allow for water takes at times of flood to fill storage facilities

In making the recommendations for storage Government should be aware that users do not pay for the water resource as a cost of production, with a consequent distortion to an economic assessment of the value of the output.

RECOMMEND that Councils make all water take resource consents subject to review according to use and benefit; but no resource consents be allowed until adequate flows for recreation have been established

AGREE that all resource consents to discharge to water ways have minimum discharge standard that the water is swimmable