

# Next Steps for Fresh Water 2016

## Freshwater Foundation Submission



Lucas Stone  
On behalf of the Freshwater Foundation

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1. The Freshwater Foundation is a group of concerned New Zealanders who have formed a trust to work for healthy rivers and lakes for people and nature.
2. We believe that the NPS-FM, including its recently released discussion document, disproportionately burdens young New Zealanders with economic and environmental debt as well as impacting on the health and well-being of the next generations.
3. The protracted timeframes and lack of urgency within the document fail to recognise the seriousness of our freshwater situation for young and not-yet-born New Zealanders who are not in a position to make decisions on their own behalf.
4. We do not accept that 'communities' can be charged with deciding to not improve water quality where it is unsafe for primary contact. First, because 'community' appears in fresh water consensus processes to include large private interest groups who have only profit as a motive and secondly and, secondly, because we should not make acceptable in law the ability to pass on a polluted environment to our children when we have the ability to do otherwise with moderate cost. For this reason, we support a central government established bottom line of 'swimmable' (primary contact - 260/100ml) for all waterways.
5. Further to this, the proposed "wadeable" bottom line appears to us to be in contradiction with the outlined values of the NPS-FM. Our national ability to "safeguard"

human, wildlife & environmental health is compromised with a bottom line that is unsafe for people to swim in.

6. With this in mind, it is our view that the priority of the NPS-FM must be the health of people, wildlife and the environment. That these are its priorities should be written into the NPS-FM itself as, through the process of developing this NPS, the seriousness of the effects of polluted water on people, wildlife and the environment has been sidelined in favour of policies that favour unsustainable land use. The consequences of this will be serious and far reaching (particularly for young New Zealanders) and are of huge concern given that the government appears not to have analysed the costs of continued degradation (only clean-up costs) on our people's health, our biodiversity, and our economy (into the future, not just over the next five years). Cleaning-up after waterways are degraded is not a sensible approach to freshwater management and it is the only cost the government appears to have researched.
7. The swimmable bottom line should apply to all waterways, except groundwater which should be maintained at drinkable standards.
8. We support the introduction of Freshwater Management Units (FMU). We support an FMU being defined as a catchment.
9. We do not support the proposed 'overs and unders' approach. We support deleting "overall" from Objective A2 as we believe it would result in unscientific "trading off" of waterways and further degradation.
10. The requirement to "maintain or improve" water quality within an FMU appears to mean those catchments with poor standards could be simply "maintained" in states that are unsafe for people and wildlife. It makes polluted water acceptable. Therefore, we support "maintain" applying to FMUs where primary contact standards exist and "improve" apply to all FMUs where water quality is found to be below the 'swimmable' standard.
11. The Macroinvertebrate Community Index must be a mandatory measurement of ecological health so we support its inclusion in the NPS-FM. We also support the inclusion of a Natural Character Index and the use of Cultural Health Indices with guidance from iwi.
12. We support the inclusion of estuaries within the NPS-FM and that the proposal that the lake attributes in the NOF apply to intermittently closing and opening lakes and lagoons.
13. As previously mentioned, we do not believe communities should be able to set bottom lines lower than this as it places a disproportionate economic and environmental burden on young New Zealanders and those New Zealanders not yet born. We believe our

responsibility is to hand down a safe thriving country, not to strip this place of assets before we leave.

14. In regions where community consensus decision making process has been used to establish regional limits, the environment has continued to suffer. We don't believe these consensus processes are being used for their stated purpose. Instead, we see that they have been used by private interest groups to continue to pollute and take from catchments. We therefore submit that the government instigates research conducted by an independent party into the limitations of these consensus processes and their subsequent environmental outcomes to establish their effectiveness before establishing them around the country.
15. We submit that this could be part of the independent review of the NPS-FM scheduled for this year. We request that the details of the independent review of the NPS-FM scheduled for this year be made public and that the results of the review are also made public. We submit that given the urgency of New Zealand's freshwater situation this review should aim to be concluded by the end of this year.
16. We support the proposal to include the additional attributes proposed particularly sediment. Sediment should be measured as deposited sediment. These attributes must be clearly defined and consulted on, as they are not yet outlined in the consultation document or NPS-FM.
17. The current bands are too wide to adequately protect rivers and lakes. The breadth of bands currently would mean that maintenance within a band constitutes significant change (i.e. further degradation).
18. We support the comments of the Parliamentary Commissioner for the Environment in 'Managing water quality: Examining the 2014 National Policy Statement [19 June 2015] with regards to Appendix 3. Existing infrastructure should be infrastructure in place by July 2014 to avoid any rush on environmentally damaging infrastructure in the coming years
19. The Freshwater Improvement Fund should not be available for any irrigation projects as irrigation has not be found to have positive environmental outcomes.
20. Regional councils should be supported in their role as enforcement agents. Work (research) should be done into how enforcement teams can apply /protect values effectively in their communities. This research should be conducted nationally and information and training given to regional staff.
21. The timeframes outlined in the consultation document are too lengthy, with the exception of "Dairy Cattle on milking platform" and "Pigs". Our freshwater problems are significant

and need to be mitigated against in the short-term. 10 years is too long, particularly for “Dairy support (third party grazing)”. Unfortunately, we no longer have the luxury of 10-15 years. We support stock exclusion being required on all dairy support by 2018 and on all other areas by 2020.

22. We also support an independent or government led audit of all farms to ensure fencing compliance as we believe that the current industry self-regulation allows for firms to simply “tick the box” on paper, while not carrying out adequate and required fencing.
23. We support the Parliamentary Commissioner for the Environment’s recommendation that the “NPS be amended to require regional councils to prioritise the setting of objectives and limits for water bodies and catchments that are particularly vulnerable and under increasing pressure, and to set interim measures to prevent degradation in the meantime”.
24. We would like to be heard on our submission and welcome a public hearing on submissions so all New Zealanders can hear suggestions and criticisms from submitters, and we may move forward together as a country.
25. Thank you for the opportunity.