

Your submission to Clean Water

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What are your thoughts on the proposed swimming targets, for example, on the timeframes and categories?

Notes

Our freshwater ecosystems have been drastically changed and degraded by habitat change, (over)harvesting of aquatic life, introduction of exotic species, including invasive pests, by domestic and industrial pollution and many other factors. The effects of many of these are ongoing. The state of most of our freshwater ecosystems are already too low and declining. The only way to improve any measure of health of freshwater, including swimmability is to improve the ecosystem as a whole. Therefore the measures should happen urgently before further loss of (particularly indigenous) biodiversity. The most urgent measures should be in place by 2020. More considered integrated measures should follow as soon as possible afterwards.

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What do you think about the proposed amendments to the Freshwater NPS?

Notes

They are inadequate to achieve the goal of genuinely swimmable rivers. More comprehensive integrated action is needed. This would work together with an effective National Policy Statement for Freshwater Management (NPS-FM) to achieve swimmability where possible as one part of the NPS-FM. The criteria should be like those in Box i of the New Zealand's fresh waters: Values, state, trends and human impacts PMCSA-Freshwater-Report.pdf. Following the recommendation of the report would go a long way to achieving the goal. Measures of ecosystem health such as the Macroinvertebrate Community Index - MCI should be the measure of water quality and criteria of success. Limits to phosphorus and nitrogen, turbidity, deposited sediment, E. coli should be set to achieve water quality and monitored to assess whether it is on track the desired ecosystem health.

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What are your thoughts on the proposed stock exclusion regulation, for example, the timeframes and stock types to be excluded?

Notes

Stock exclusion is one of the most urgent and effective measures. Temporary (electric) fencing could be used while long-term follows. Skills training programmes could be combined with no-interest loans to landowners to speed up work.

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Do you have any other comments on the contents of the Clean Water discussion document?

Notes

It should be part of an urgent comprehensive ecosystem ,catchment-wide, conservation programme.