

Your submission to Clean Water

Clause

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

Notes

I think the proposed targets are reasonable, but am concerned that they are being applied only to a small fraction of New Zealand's rivers and lakes. The focus may be on bodies of water that are deep enough to swim in, but surely analogous targets could be developed for shallower bodies of water as well.

Clause

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

Notes

The draft amendments to the NPS propose to introduce a new test requiring environmental and ecological considerations to be weighed against economic ones. In practice this will be used to set freshwater objectives or quantity limits that do not achieve ecosystem health, which is unacceptable. The "balancing" of environmental and economic considerations has already happened during the consensus building process that that Land and Water Forum used to come to its recommendations, and can continue to happen in the way in which timeframes are set. I oppose the inclusion of any new test that requires a balancing of environmental considerations against economic ones. As a society we must acknowledge that such "balancing" has occurred repeatedly over many generations. The people seeking to use freshwater resources for economic gain may be different each time such a "balancing" occurs, but we seem to forget that we're exploiting the same rivers, lakes, estuaries and aquifers with each round of negotiations. We may think we're being conciliatory in any one round, but over time we are compromising these habitats, and the species that depend on them, into a state of profound degradation and even extinction. It is well past time for us to realise that the long-term future of our ecosystems, and our ability to benefit from and enjoy them, depends on us making some substantial sacrifices now.

Clause

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

Notes

One specific example of the need to rein in our tendency to "compromise" applies to proposals for stock exclusion. The deadlines set in the proposal should be rethought and applied at much earlier dates than proposed, and penalties for non-compliance must be tougher. Furthermore, the government must ensure, through both funding and policy, that regional councils have the ability and the motivation to monitor compliance and aggressively penalise transgressions. Compared to the cost of compliance (fencing, planting etc.), a \$2000 fine is negligible. Given the remoteness of many vulnerable habitats and the resulting low probability of a violation being detected, reported, and proven, low fines are unlikely to act as a strong deterrent. The stakes are high for the waterways themselves - true "balancing" would mean making the stakes high for the stakeholders directly benefiting from their exploitation as well. A similarly strong stance is required for other types of violation, such as spread of pest species and unacceptable levels of runoff.

You have elected to withhold your personal details from publication.