

Your submission to Clean Water

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Clause

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

Notes

It is unclear how the overarching goal that 90% of rivers and lakes will be swimmable by 2040, and the interim goal of 80% to be swimmable by 2030, is to be worked into the existing plan processes. The goal is not legally enforceable. I recommend: The goal of 90% of rivers and lakes to be suitable for primary contact recreation should apply to all rivers and lakes. The timeframe of 2040 should be brought forward to 2030 or sooner. The swimming proposals only refers to large rivers and lakes and these rivers and lakes have not been identified. Are only larger rivers and lakes relevant? This excludes most of the waterways. It is the smaller water bodies where most people swim, because the water is warmer and safer. Therefore I suggest the new primary contact E.coli attribute table apply to all waterbodies. Primary contact recreation targets should be set for ALL natural waterways. There is no clear course of action to achieve water quality suitable for swimming. Definitions are unclear and inconsistent eg swimming, swimmable, suitable for immersion. Therefore, the NPSFM should set a clear and definitive goal that water quality be suitable for primary contact recreation. Delete definition of "suitable for immersion". These "swimmable" targets certainly need to be included, and implemented, but they should not take priority over the other targets which address the crisis in biodiversity.

Clause

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

Notes

1. Many people recommended the use of the MCI as a measure for ecological health of a river " including the Land and Water Forum, Dairy NZ and FANZ " where is it? How are you monitoring macroinvertebrates? Why has it not been added? 2. I have read an international report that stated that NZ native fish are very susceptible to Nitrate Toxicity at over 1.5mg/m3. The national bottom line should NOT be at extinction level, but at the level where their health starts to suffer, at between 1.5 " 3.5mg (currently B) 3. There are gaps in the full range of attributes that need to be managed eg sediment, copper and zinc. Sediment is a large problem contributing to declining water quality. Include all impacts from sediment as attributes in National Objectives Framework. Include policy direction on sediment management. Include copper and zinc attributes in the NOF. 4. Remove amended added line on Objective A2 and Objective B1. "Economic wellbeing" and "productive economic opportunities" are relative and loaded terms " open for misinterpretation. At the very least, please only keep "Economic wellbeing" and remove "productive economic opportunities" " as our economic wellbeing as a nation can certainly be achieved without environmental degradation. But this may not necessarily include economic growth, based on production. Nor may it be at current levels of supposed "wellbeing."

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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

You are too conservative. ALL stock should be excluded from ALL lakes, rivers and streams, within 2 years. The timeframes are far too long. ALL stock should be excluded from ALL lakes, rivers and streams at a distance of 5 meters or more. If fencing is difficult, then this land must not be used for stock, until fencing or riparian plantings can be established. The tributaries and seeps are the most important part of our waterways, and need to be protected, perhaps even more than the larger flows. So I recommend making it simpler for everyone " why make it so confusing?? ALL waterways. NO stock. I'm rather embarrassed by this lame response to a serious problem. Occasional stock crossings is satisfactory. Absolutely no option for a "stock exclusion plan". Blimey " this is how we got into this mess in the first place! By providing little out-clauses. Of course farms will apply for this in the first instance, and then the consent team of the local councils get bullied into submission. The fines should also apply to any human who defecates near a water body - \$2000 per instance, if it is a tourist " they must pay immediately or be deported. Honestly " if we want to have a clean green NZ in the future " then we have to become very strident about protecting it.

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

Notes

I have just walked 10 of the rivers in Canterbury " and we are in trouble. The rivers are dying. Species extinction is currently New Zealand's greatest threat and all resources should go towards this end, over any human "swimmable" issues. Humans can wait!. We need to solve the nitrate toxicity ASAP, in all streams, for fish life. And the over-allocation issue immediately - as the rivers are suffering from low flows. REGARDING - Freshwater Improvement Fund. I am annoyed at the way taxpayer money is continuously used by industry and farming in order to comply with their resource consents and with the law, while many volunteer community groups who manage waterway improvement or monitoring projects still go unfunded. Therefore I think that these funds should NOT BE available to improve waterways where waterway improvement is required as part of a business, enterprise or farming resource consent or to comply with legislation (ie WCO"s). The waterway improvements on farm/industry must be self-funded out of the profits made by the enterprise. Or they should be separately taxed, in order to fund this work. I recommend a "Polluter Tax" be applied to ALL fertiliser sales, and all other potential pollutants that are entering the market - ie zinc, lead, cadmium, at a nominal rate of 1-2%. As fertiliser sales to NZ farmers are currently at \$2B " this would be a significant amount. I DO NOT support that this fund be available for dairy farmers to undertake basic riparian planting on their waterways. This is required as part of their land use consent. I DO NOT support the minimum limit of \$200,000 " this is out of reach for community groups who are undertaking small localised solutions. I also DO NOT support the use of this fund to pay for chemical spraying of any sort, or to pay for, or to research

antibiotic solutions – ie nitrifying bacteria inhibitors. I support the use of this fund to engage broader and independent scientific research – based on a WHOLE SYSTEM approach - with teams of specialists working together from different fields. (ie. NOT silo science) I support projects that achieve fast, ambitious, significant and achievable results in small areas, rather than piece-meal ad-hoc projects over larger catchments. REGARDING 6.1. ALLOCATION We have not had proper guidance or policy from government on this issue for over twenty years. Objective B2 – to phase out existing over-allocation – needs to be effective immediately – and to be fair across-the-board reductions on ALL consents on ALL properties. We have spoken with farmers who agree, as long as it is fair – and everybody reduces their water takes. You need to show leadership in this area. It is NOT a solution to take river-water to replenish the groundwater, so irrigators can keep sucking it out further down. REGARDING –GOOD MANAGEMENT PRACTICES– The first order of business in NZ is destocking, deintensification, and reducing NZ farmers dependence on synthetic fertilisers by looking beyond the cartel of Ballance Agri-Nutrients Ltd and Ravensdown Fertiliser Co-operative Ltd who impoverish farmers and cripple the environment with overuse of their products. I was embarrassed to recently learn that New Zealand has the highest use of fertilisers per hectare than any other country. In 2015 we had 13,929,375 hectares of land devoted to farming. That same year we used 2,135,743 tonnes of fertilisers as a nation. That equates to 6.5 tonnes per hectare. (Source: MPI Stats) The figures you supply to the Worldbank are much less than that, and therefore possibly not even the true amount – which is already horrendous and well above all other respectable farming nations. We are equivalent in our fertiliser use to Bahrain – which is a desert. (See <http://data.worldbank.org/indicator>) And you think that we’re so pure and have such great innovation in farming? Where is our reputed –number 8– thinking in this? We are simply plodders and have so lost touch with how nature really works, that we can’t even claw our way back to true honest –kiwi– farming. Therefore any sort of –good management practice– in regards to the NPS-FM must be completely independent of BALANCE, RAVENSDOWN, FANZ and OVERSEER. I recommend that independent soil scientists play a large role here, and that you begin with the premise – –Do Not Harm Nature.– This includes ALL soil microbes, bacteria and the amazing life that lives in the soil – which is destroyed by synthetic fertilisers and their associated spraying regimes. I recommend that Soil Microbes be given legislative protection, They must not be harmed, as they are needed by our nation to rebuild our soil and prevent further waterway pollution. I reject any sort of –good management practice– that uses as its foundation the same sort of pseudo –science-based– approach that researched and promoted the baby-killing toxin DCD – remember how MPI were advocating this as –good management– when spread at 20kg/hectare only a few years ago! Oh, but that was until China got wind of it and it quietly disappeared from the inventory of Balance and Ravensdown. You have made some progress on this document, but in general, it is not strident enough to match the crisis the waterways and their biodiversity is currently facing.