

Your submission to Clean Water

Carolyn Jeanne Boulton



Clause

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

Notes

I have spent weeks swimming in New Zealand's stunning rivers on warm summer days, and I am saddened to see the water quality deteriorating in recent years. I oppose the proposed amendments to the Human Health for Recreation attribute table, which would weaken the standard for swimmability. The E.coli attributes need to be strengthened, not weakened. I support the inclusion of smaller rivers and streams (below order 4) in the swimming standards, as these are the places that are often used by local communities to swim and play. The National Policy Statement should specifically include in its objectives and policies the requirement for regional councils to meet water quality targets within specified timeframes.

Clause

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

Notes

I support the requirement for regional councils to adopt a Macroinvertebrate Community Index (MCI) score of 80 as a minimum threshold, and to develop an action plan to improve the MCI score to above this threshold, or when monitoring shows there is a downwards trend in the MCI, to reverse that trend if a waterway's MCI score is low or declining "as recommended by the Land and Water Forum. I also support the adoption of all the recommendations made by the Land and Water Forum to assist regional councils to limit two key nutrients, nitrogen and phosphorous, in our rivers and lakes. I am particularly concerned about the recent report Our Fresh Water 2017 published today, 27 April, that nitrogen levels are getting worse in 55% of the monitored streams across New Zealand. According to the report, waterways in my province, Canterbury, has nitrogen levels of 1450-7882 mg/m3, and this will have long term ecological consequences, particularly for vital wetlands.

Clause

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

Notes

I would also like to comment on the proposed regulations for stock exclusion. The deadlines that have been proposed for excluding dairy support, deer and beef cattle from waterways over 1 meter wide, lakes and wetlands are unambitious and should be brought forward. I support the following changes: The 2022 deadlines should be brought forward to 2020; The 2025 deadlines should be brought forward to 2022, and; The 2030 deadlines should be brought forward to 2025.

Clause

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

Notes

I would also like to comment on the economic implications of the discussion document. 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 might be used to undermine the freshwater objectives if (short-term) economic benefits outweigh ecological ones, which is unacceptable. Indeed, environmental and economic considerations have already been 'balanced' during the consensus building process that that Land and Water Forum used to come to its recommendations. I oppose the inclusion of any new test that requires a balancing of environmental considerations against economic ones.