



Canterbury Aoraki Conservation Board Te Rūnanga Papa Atawhai o Waitaha me Aoraki

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Clean Water Consultation 2017
Ministry for the Environment
PO Box 1032
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“CLEAN WATER: 90% OF RIVERS AND LAKES SWIMMABLE BY 2040” AND PROPOSED AMENDMENTS TO THE NATIONAL FRESH WATER POLICY STATEMENT

Submission from:

Canterbury Aoraki Conservation Board - Te Rūnanga Papa Atawhai o Waitaha me Aoraki

Canterbury Aoraki Conservation Board welcomes this opportunity to comment on proposals contained in the consultation document *Clean water: 90% of rivers and lakes swimmable by 2040*. We commend Dr Smith, Mr Guy and the Ministry for the Environment for early community engagement in the process of developing new policy for fresh water.

Policy and practices which optimise the life supporting capacity of our water systems are fundamental for conservation.

Canterbury Aoraki Conservation Board (the Board) is an independent body established by the Conservation Act 1987. Made up of 12 appointed members, the Board represents the community of interest not only in the work of the Department of Conservation (the Department) but also in conservation in general within Canterbury.

The Board's main responsibility is to work with the Department to develop a conservation management strategy for our area and to oversee its implementation. The process for developing the strategy involved full public consultation and hearings and the Board believes the Canterbury (Waitaha) Conservation Management Strategy 2016 (the Canterbury CMS) fairly reflects the views of the wider community. The strategy contains a vision, objectives and policies for the region which are aligned with national objectives of the Department of Conservation. The Canterbury CMS was signed off by the Minister of Conservation and became operational on 1 September last year.

Quotes in bold text are taken from the Canterbury CMS.

1. The *Canterbury Waitaha Conservation Management Strategy* vision for Canterbury in 2066 looks like this:

“Flowing from the mountains to the sea, through high-country basins and across the Canterbury Plains (Ngā Pākihi Whakatekateka o Waitaha), braided rivers and lowland streams with restored riparian margins connect the mountains and the sea with remnant ecosystems on the plains. These waterways and their margins are thriving clean and healthy ecosystems highly valued by the community and recognised internationally as habitats for a diverse range of native plants and animals. Canterbury is widely known for its clean rivers and lakes”. (p18)

2. The Board strongly supports policy proposals in *Clean water: 90% of rivers and lakes swimmable by 2040* and amendments to the National Policy Statement on Freshwater Management 2014 which help to achieve this vision.
3. The Board supports the establishment of national bottom lines for both ecosystem health and human health.
4. The Board does not support the proposed amendment to Water Quantity Objective B1 of the National Policy Statement. Addition of the new words “*while providing for economic well-being, including productive opportunities*” undermines the intent of the existing objective, complicates interpretation, and is unlikely to assist the Department and the community to achieve the Canterbury CMS vision.
5. It is the Board’s view that “*safeguarding the life supporting capacity, ecosystem processes and indigenous species including their associated ecosystems of fresh water*” is paramount. Economic use should only be provided for if those values are safeguarded. The existing objective already provides for “*taking, using, damming or diverting of fresh water*” through sustainable management.
6. The Board supports the holistic Ki Uta Ki Tai approach which seeks to achieve improvements in water quality for whole rivers from the mountains to the sea. It is the Board’s view that the amended National Policy Statement should require that monitoring plans include regular sampling at a number of representative locations along the length of a large river, for example, to get a full picture of the state of the fresh water environment, and not just from a single, selected, location for each water body.
7. The Board supports the use of catchment-based freshwater management units to facilitate integrated management of fresh water systems, but is concerned that policy which accommodates variability within a freshwater management unit could, in some cases, enable further degradation at some locations within the unit. The Board would support a policy setting which requires that existing water quality and ecosystem health are at least maintained, if not improved, along the full length of a river or throughout a fresh water management unit.
8. The Board totally supports macro-invertebrate monitoring as a means of assessing ecosystem health and managing water bodies for the conservation of indigenous organisms as well as for other values. Best practice monitoring of ecosystem health is fundamental to achieving the vision of the Canterbury CMS.

9. While the fresh water policy focus in the Canterbury CMS is on the protection of natural heritage values, the Department also has a statutory role to foster the use of natural resources for outdoor recreation, including swimming (s.6 (e), Conservation Act 1987).
10. The Board therefore supports provisions which seek to improve “swimmability” of water bodies over time and supports the ambitious target set, together with the interim milestone of 80% swimmable by 2030. As this target is set for over ten years in the future the Board would also support setting of an additional interim milestone against which progress can be assessed five or six years from now.
11. One of the limitations of the proposed amendments to the National Policy Statement on Freshwater Management 2014 is that provisions for improvement in water quality for contact recreation over time only apply to “*large rivers and lakes*”. The definition of large rivers and lakes does not include many local waterways where people often swim, especially families with young children.
12. There are many smaller streams and creeks adjacent to, or passing through, public conservation lands which will not be covered by the proposed provisions. This includes reserves which have been classified specifically for recreation where the public might expect water to be completely safe for swimming. The Board suggests that the National Policy Statement should require monitoring plans to include representative sites within or adjacent to public conservation lands used by the public for outdoor recreation.

Thank you for this opportunity to have input into the development of new policy to improve fresh water quality and quantity in Canterbury.

Yours faithfully,



Dr Mick Abbott
Chairperson, Canterbury Aoraki Conservation Board