

Subject: Clean Water Consultation- Submission
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Kia ora,

I support the goal that all of our lakes and rivers should be swimmable. I believe, however, that the ecological health and sustainability of our freshwaters, along with the survival of New Zealand's indigenous freshwater species, should be the primary goal of our freshwater management policies. The National Policy Statement (NPS) should have this as its primary goal. The recent *Our Freshwater 2017* report confirms the dire state of our waterways and the extreme threat to our freshwater species.

The key proposal that must be removed from the current Government proposals is the suggestion that decisions on ecological protection must be "balanced" by considerations of so-called "economic development." Such a process will undermine the RMA and further threaten our already endangered freshwater and its native fauna and flora. Our economy is a mere sub-section of this land's ecology, not a mighty force to be "balanced" against it. Without freshwater and a viable ecological system our economy is stuffed, as are we as a species. The ridiculous suggestion that ecological survival must be weighed up against money-making must be removed from any decision making on freshwater.

We should maintain standards that keep all of our lakes and rivers as swimmable, drinkable and as viable habitats for our native species.

We should maintain, preserve and re-establish wetlands, as New Zealand has destroyed the majority of these vital habitats.

The "spray and pray" technique of pasture development, which destroys native tussock and other vegetation, while polluting waterways, should be banned.

The current appalling levels of nitrogen and phosphorous in many of our waterways must be reduced. To bring this about the Land and Water Forum proposals to assist regional councils to limit nitrogen and phosphorous in freshwater should be adopted.

Cattle, deer and sheep should be kept out of waterways over 1 metre wide. They should also be excluded from lakes and wetlands. This policy should be brought in immediately- failing that the Forest and Bird suggestions should be adopted. "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."

I agree with the Forest and Bird view regarding the "swimmability" aspects of the Government's proposals i.e. "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. 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."

I also support the Forest and Bird view on Ecological Health that " 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."

and

on Targets and timeframes that "The NPS should specifically include in its objectives and policies the requirement for regional councils to meet water quality targets within specified timeframes. Economic considerations: 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. "

As a closing point I would add that this is a Treaty issue. Article 2 of the Treaty of Waitangi guaranteed the chiefs and hapu of New Zealand the continuous possession of their taonga. One such taonga is fresh, swimmable, drinkable water with native species living in it. I believe the current policies destroying our freshwater are a violation of the Treaty of Waitangi.

Thank you for the opportunity to send in this submission.

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