

## **To the Ministry for the Environment Submission on the 'Clean Water Consultation – 2017'**

Thanks for the opportunity to provide comments on the proposed changes to the NPS-FM.

I have several specific comments I would like considered:

Firstly, and primarily, I strongly object to the changes proposed for Objective B1 and the addition of the words

*“, while providing for economic well-being, including productive economic opportunities”.*

This is because this appears to negate the primary purpose of the act and make the safeguarding of the life-supporting capacity etc. of freshwater only possible providing economic needs are met. This is wrong way to look at this, it is the environment that provides the opportunity for us to have an economy, so the economy needs to exist within the constraints of the environment. Please keep this objective as it currently is.

Further, if this was changed then it would appear to conflict with elements of the proposed changes to Policy C1, specifically:

*“b) managing fresh water and land use and development in catchments in an integrated and sustainable way, so as to avoid, remedy or mitigate adverse effects, including cumulative effects.”*

This policy talks about the “integrated and sustainable” management of land use and development in catchments, how can this be possible if maintaining the life-supporting capacity of freshwater is only possible after economic well-being and growth has been considered?

Secondly, I strongly object to the changing of the E. coli attribute state to 540 E. coli/100ml. While I applaud the governments aspirations and intent to improve freshwater quality I discourage them from attempting to achieve this by reducing the threshold and the measures for ‘swimmable’.

Thirdly, as an aside which I appreciate is outside the scope of this specific consultation, I would encourage the government to look at its activities from a multi-disciplinary point of view. For example, there would appear to a conflict in trying to develop the NPS and improve freshwater quality while at the same time encouraging irrigation through the irrigation development fund. Further, I would actively and strongly implore the government to holistically (not just MfE) deal with the issue of iwi rights and interests in freshwater. While this is likely to result in a Treaty claim, I believe that this is the only way forward to continue addressing some of the issues around both freshwater quality, quantity AND economic growth. Dealing with iwi rights and interest will better establish property rights, allowing better and clearer use of economic instruments in the future for the pursuit of both water quality and quantity aspirations. To be clear, I am not suggesting that Iwi should

own water, but until that conversation is had at a national level and some resolution achieved (much the 'Sealord deal' in fisheries), then we will not be able to address inefficient and counter-productive parts of the RMA (like first come first served for eater allocation) and economic instruments on pollution. While this is politically difficult I believe it is the only way forward to achieve logical, widespread and enduring solutions that can use market forces and economic instruments to achieve sustainable environmental outcomes.

Kind regards  
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