Clean Water Submission – Geoff Evans

Preamble

The five key components are accepted by most NZ citizens. However as with most plans there is some divergence of opinions and need for discussion .Please consider the following based on the Clean Water Consultation documents 6 chapters.

(1) The target of 90% of rivers swimmable has already been achieved and exceeded in Marlborough. (94%) The new Marlborough Environment Plan already contains regulation related to intensively grazed stock , dairy, deer and pigs. Fonterra also regulates its farmers.
It is heartening that Government is funding "Our Land and Water National Science Challenge", developing new practices and technology to improve water quality while enhancing primary sector productivity.
New technology is the key to manage these targets.

Suggestion:
Present achievements in Fresh Water Management be recognised and accounted for, and Productivity must be recognised as an essential part of the equation .

(2) Better information on water quality in our rivers and lakes is essential .
Sediment, e coli, phosphorous and nitrogen sources need to be clearly identified before any worthwhile remediation can be attempted.
Examples: Sediment in Marlboroughs rivers largely has natural sources, E coli in the Taylor and Lake McCrae have been traced to waterfowl and dogs (Taylor)
Other chemicals such as benzene, synthetic estrogens can be found in treated urban point source discharges such as stormwater as well as non point source discharges.

Suggestion:
Sources of contamination be clearly identified before remediation is targeted or attempted.

(3) 2014 NPS Amendments

3.1 The changing values of wadeable to swimmable lifts the bar. There is a need to create more certainty.

Suggestion:
There needs to be a clear scientific definition of swimmable.

3.2 Monitoring macro invertebrates is agreed to be a useful tool in assessing water quality. The only difficulty may be setting the standards .There may be a lag time in assessing a fall off in water quality.

Suggestion:
This monitoring tool needs support of other methods.

3.3 Maintain or Improve water quality

This is a worthwhile target but the influence of natural events must be part of the considerations. For example, naturally generated sediment, seismic events ,changing temperatures and varying rainfall are part of the natural process. These challenges need balanced assessment.

Suggestion:

Allowance be made for natural events.

3.4 Managing nitrogen and phosphorus is again managing nutrients that are also vital for all life. Completely "pure" water cannot sustain life. (Ref Alaskan salmon / forest ecosystems). On the other hand too much N and P is also is detrimental. Science needs to suggest the appropriate levels, and these may not be the same over all water bodies or freshwater management units.

Suggestion:

Levels have to be monitored to achieve sustainable results. This also should include other chemicals such as synthetic estrogens or benzene.

3.5 Economic Well Being. Agreed freshwater is vital to the NZ economy, the success and future of our primary industries and our tourism sector."

But to go further, it includes every living thing and is vital to all life on earth.

Suggestion:

Amending the NSFW should also include consideration of productivity including food production.

3.6 Effect of National Bottom Lines on Infrastructure:

As noted this may not fit all, for example the rainfall at Haast is many tmes that of Blenheim and the soils are very different.

Suggestion:

Bottom lines be developed for all specific FMU (Freshwater Management Units)

3.7 Coastal lakes and Lagoons -appropriate action is proposed.

3.8 Te Mana o Te Wai

This is a matter for Central Government to address.

(4) Funding to Improve Fresh Water

The Fresh Water Improvement Fund: Generally the concept is essential ,but the criteria needs widening to include (3.5 above) Economic Well Being. $100 million is just a start.

The high cost of the following concept "(5) Keeping Stock Out of Waterways" means that demand for funding will be well in excess of the $100 million allocated.

Minister Smith has said that to achieving the aims of the Government's Clean Water stock exclusion "will require 100s of $100 millions".

(The clean up of Lake Taupo alone received a government grant of $80 m)

Suggestion:

There needs to be extra guidance as to the source of these funds, as Councils and their ratepayers have very limited resources. It is also clear the agriculture industry, in particular, pastoral farmers, is will be unable to meet these costs

(5) Keeping Stock Out of Waterways,

The Marlborough Environment plan already limits exclusion to intensively farmed livestock, dairy ,pigs and deer.

As alluded to in item 4 there will be substantial cost to this proposal. More management and fencing is costly and requires maintenance. The additional water permits consents, reticulation and troughs to supply water to stock all add to cost. These costs will be on going .

At present the proposed regulation appears to cover all pastoral farming in NZ.

Wetlands are difficult to define . It should be noted that on farm some wetlands can be a food source in dry spells for livestock. The loss of use of wetlands will have a substantial effect on stocking rates particularly in provinces subject to drought such as Marlborough.

MDC guaranteed existing use rights when scheduling wetlands for the MEP.

This regulation is happening on private land which includes, in many, cases, stream beds, and many wet areas and wetlands. Effective productive land area will inevitably be reduced. The ability of land users or managers to use their property will be constrained.

It may be considered more cost effective for Government to encourage land use change, particularly around extensive low value land areas. Livestock farming and fertilizer use has already declined., This change is happening with growth in vineyards and afforestation

There is a strong case for compensation for the additional costs and loss of land use as was achieved around Taupo where Government bought some affected properties.

Suggestion:

Given that Marlborough is now 94% compliant, Government commits to a robust cost benefit analysis to identify any FMU's (Fresh Water Management Units) in Marlborough that are either non compliant at present or at risk of being so related to the new benchmarks (Swimability).

Then the regulation and funds can be targeted to these identified areas of need.

There is no need to include compliant areas

Assistance including compensation for costs of implementation, productivity loss and loss of use must be on the table for affected land users.

Recognise that Councils will also have difficulty funding and implementing this process

(4) Future Work Program.

These programs must be addressed with open minds.

Food and water sustainability needs balance

Technology can turn sewage into potable supplies ''toilet to tap" or " showers to flowers "but it is costly and to some unacceptable

Marlborough has achieved a Freshwater Allocation regime that is developing with e allocation into a template others could use. Good management practises are part of that program.

These are sector leading innovations but there is always room for improvement

I support the National Science Challenge as an essential to gain future direction.

There needs to be more research in to what is now called emerging contaminants pharmaceuticals and a cocktail of other chemicals that at present are found in treated water overseas.

Research is needed into Marlboroughs stormwater treatment as well. {Unofficially I have been told that to clean up Aucklands stormwater is now estimated to cost $ 4 billions)

Finally this regulation should only be applied where there is a clearly identified problem with water quality.

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