

I support high standards for our rivers and lakes to achieve that ensure they are swimmable, and ecologically healthy.

**Swimming Target 90% of rivers and lakes are swimmable by 2040.
80% of our rivers and lakes swimmable by 2030.**

These targets are weak and unambitious especially as the level of E coli considered safe has been raised. Virtually all of our waterways should be swimmable most of the time, except for a period during and following storm events.

I believe it is our right to expect that we can enjoy fishing and swimming in healthy clean streams and rivers.

The ability to safely swim in our rivers and lakes is part of our national identity. This ability has been destroyed by intensive farming and we now have rivers and lakes that are a health risk or are clogged with weed and algal blooms. Eg Lake Rotoehu

I think that the targets must apply to smaller waterways. Small streams are more susceptible to pollution, and all eventually lead into the larger rivers. The notion of 'deep enough to swim' is too limiting.

The case studies cited (Manawatu River and Lake Brunner) show that water quality can and does improve when the land and water is managed differently. However just fencing waterways is not enough to protect them from diffuse run off. The fencing needs to be at least 5m back from the stream edge and riparian plantings used to filter nutrients and sediments. Some of the current fencing eg in the catchments leading to Ohiwa harbour are so close to the stream bank as to be futile.

Low E coli levels are an indicator that the land is being managed responsibly and sustainably.

Conclusion:

- Swimmability of 95% of waterways 95% of the time by 2030 should be the target.
- The E coli standard should be retained at the current level and not increased as proposed.
- Councils should be required to achieve a progressive improvement, and to not allow any reduction in swimmability.
- The standards should apply to all natural waterways regardless of size.
- We support the changes to the NPS to delete reference to secondary contact and to include swimmability as a key component of the limit-setting process.
- Controls over land use and stocking densities need to be introduced to protect aquatic value.

Ecological Health

I support the requirement for regional councils to monitor macroinvertebrates in rivers and streams.

I support 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 Forum¹.

I 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 lakes².

Targets and timeframes

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 proposed new test requiring environmental and ecological considerations to be weighed against economic one makes the whole NPS ineffective and this aspect needs to be removed. The environment always loses when economic benefits are included. The time for balancing is well past. We have lost 90% of our wetlands and the majority of our lowland lakes and streams are heavily polluted. As a result nearly 90% of our native fish face extinction. What is needed now is for environmental considerations to take precedence and the legislation needs to state this quite unambiguously. The 'balancing' of environmental and economic considerations has already happened during the consensus building process that the Land and Water Forum used to come to its recommendations, and can continue to happen in the way in which timeframes are set.

The notion of 'balancing' is fallacious. The current state of our waterways has occurred because "balancing" has always come out in favour of economics and our natural ecosystems, habitats and species have suffered as a result. More of the same will not produce better outcomes.

Just a quick glance at the swimability maps reflects the correlation between intensive dairy farming and poor water quality. This together with poor urban water quality signals where change of land and water management practices is urgently needed. These sectors of society need to invest more in environmental capital rather than using it up.

¹ <http://www.landandwater.org.nz/Site/Progress.aspx> p2

² <http://www.landandwater.org.nz/Site/Progress.aspx> p4

NZ tourism makes much of our clean green image and 100% pure NZ however this is just a sick joke given the current state of our lowland waterways. Tourism is a huge income earner and we are placing it at risk by allowing intensive farming to destroy the aquatic ecosystems.

Conclusion:

Do not proceed with any further emphasis on “balancing” economic interests with water quality.

Keeping stock out of our waterways

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. Waterways are at risk not just from animals urinating and defecating directly in the waterway – they also cause significant erosion of banks, which increases sedimentation, which is having serious adverse effects on our estuaries. All catchments feeding into lakes and estuaries should exclude all stock and the fencing needs to be at a sufficient distance from the waters as to allow for effective riparian plantings.

Exclusion should be brought forward as follows:

The 2022 deadlines should be brought forward to 2020;

The 2025 deadlines should be brought forward to 2022,

The 2030 deadlines should be brought forward to 2025 and;

All pigs and dairy herds should be excluded from all streams, lakes and wetlands, not just those over 1 metre wide. In any case this should already have happened under the Fonterra Accord.

All stock should be excluded from all wetlands.

Regulation of stock crossing is supported. However standards/regulation is needed to ensure that culverts in particular are not permitted activities so that their construction and maintenance can be monitored. These structures can readily become barriers to fish passage which just replaces one environmental problem with another.

There needs to be a much more rigorous enforcement of rules and significant financial penalties need to be imposed where breaches occur. The soft approach of focusing on education of landowners with warnings given rather than significant penalties has not worked. Given that farmers are being provided with extensive phase in time the monitoring and enforcement need to be much more rigorous. Penalties should be at a level commensurate with other RMA penalties for effluent discharges.

Riparian buffers

The exclusion proposed will not be significantly effective if it consists of an electric or two wire fence right on the bank of the waterbody. Fences need to be set back at least 5 metres to allow banks to stabilise and develop an effective vegetated buffer. The Nukuhou River which flows into Ohiwa Harbour, is the source of major sedimentation, yet the fences are so close to the bank that no vegetative stabilisation can occur and the banks are seriously eroded.

Funding

I think that the government should transfer the funds being used to promote unsustainable irrigation projects into a fund to be used to help clean up the most polluted waterways. Irrigation simply promotes intensification which makes the problems worse leading to more pollution.

We need to accept that some areas are simply not suited to intensive dairying and it should be a banned activity in sensitive catchments. There needs to be limits on the number of stock units per hectare in relation to soil types and climate. Much of the intensification is on light/volcanic soils where the nutrients simply filter down into the water table and aquifers with the potential to pollute lakes such as Taupo for decades to come. Riparian planting does not address this effect.

It is shameful that New Zealand has aquifers that are polluted and the government should not allow it to continue.

I believe we need to make polluters pay for the downstream damage caused by their activities and I am very sick of taxpayers and ratepayers paying out to try and restore ecosystems that have been damaged by private enterprises.

There needs to be a consideration of the huge economic value of the natural capital of NZ. For example the long term economic and social value of an unpolluted Lake Taupo far outweighs any short term economic benefits gained from dairy conversions in the surrounding catchments. Just letting market forces operate in an unrestrained manner has led to the current crisis we are facing. We need a much more stringent regulatory environment to restore some balance and to ensure our waterways are not completely destroyed.

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