Your submission to Action for healthy waterways – consultation

Submitter Type: NGO

Clause
Proposals as a whole - please refer to questions 1-3 on page 19 of the discussion document

Notes
1. Do you think the proposals set out in this document will stop further degradation of New Zealand’s freshwater resources, with water quality materially improving within 5 years? Yes, there’s a good chance of improvement. These proposals provide some good first steps. 2. Do you think the proposals will bring New Zealand’s freshwater resources, waterways and ecosystems to a healthy state within a generation? Yes, there’s a good chance of this – and huge potential to set the course for continuing improvement. 3. What difference do you think these proposals would make to your local waterways and ecosystems and your contact with them?

Clause
Impacts and implementation - please refer to questions 4-6 on page 19 of the discussion document

Notes
4. What actions would you think you, your business, or your organisation would take in response to the proposed measures? We would continue to work on habitat restoration, monitoring and education. We would continue to work collaboratively with landowners and other organisations. 5. What support or information could the Government provide to help you, your business, or your organisation to implement the proposals? Good transparent information, monitoring, advice provided in a timely way by adequate appropriate government or council staff and systems. Vastly improved wastewater treatment facilities and practices (all treatment facilities should be urgently shifted away from waterways or coasts). The weakest links seem to be local councils. They struggle with staff stress, increasing expectations and inadequate resources. Regional and city councils need preparation, uncomplicated processes, and funding that allow for healthy water. This subject is important enough to have central government fund, guide and manage it. 6. Can you think of any unintended consequences from these policies that would get in the way of protection and/or restoration of ecosystem health? Locally may cause undue stress for farmers already practicing responsible farm management. These requirements and the uncertainty they bring may sap energy from current collaborative work.

Clause
Water commission and other comments - please refer to questions 7-8 on page 19 of the discussion document

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7. Do you think it would be a good idea to have an independent national body to provide oversight of freshwater management implementation as recommended by KWM and FLG. Yes, definitely. 8. Do you have any other comments? There would be value in, while working with landowners with the least responsible practices, this effort at improving our practice and processes should also consider supporting a concurrent programme that supports the best practices – allowing those places, organisations, and people making real strides, having real wins when it comes to looking after the health for our waterways. A combined approach of sanctions and rewards could accelerate the results, encourage shared experiences and best practices and grow the positives as well as accelerate the transition to new supported practices resulting in earlier, stronger results – and improved freshwater and adjacent ecosystems.

Clause
Te Mana o te Wai - please refer to questions 9-12 on page 36 of the discussion document

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9. Do you support the Te Mana o te Wai hierarchy of obligations, that the first priority is the health of the water, the second priority is providing for essential human health needs, such as drinking water, and the third is other consumption and use? Yes 10. Do you think the proposals will have the desired effect of putting the health of the water first? Yes 11. Is it clear what regional councils have to do to manage freshwater in a way consistent with Te Mana o te Wai? No, this part needs work. It will only continue to confound and confuse authorities. The duty of care for both terrestrial and aquatic environments must be with an integrated regulatory and supported authority. Historically, splitting authority over integrated ecosystems has proven to be ineffectual and damaging to our environment. 12. Will creating a long-term vision change how councils and communities manage freshwater and contribute to upholding Te Mana o te Wai? Yes

Clause
New planning process for freshwater and redrafted National Policy Statement - please refer to questions 17 on page 36 of the discussion document and questions 40-42 on page 53

Notes
18. Does the proposal make the roles and responsibilities between regional councils and territorial authorities sufficiently clear? Has the potential to be one of the most essential components of this consultation. It could work, but we have little historic experience with positive implementation and understanding of cooperation between councils. Council/territorial authority history shows poor cooperation, poor management, “buck passing” and adversarial relationships. It comes down to the very concept of “territory”, when in fact (and in Nature) there are no clear delineations from one territory to another. There’s a need for establishing new “rules of engagement” when understanding and looking after terrestrial and aquatic habitats. Having separate but not functional overlapping authority often allows for minimal heed to the real cumulative negative effect on waterways. There appears to be little or no attention to either science or good stewardship/guardianship of natural waterways until the “pressure cooker” resource consent hearing or environment court cases. Te Mana o te Wai Integrated approaches to natural habitats and integrated planning, management, protection and regulation are essential. The best chance at this may be other than the current proposed design. Only by including both terrestrial and aquatic ecosystems for consideration, regulation and care will the interconnectedness of these natural habitats be respected and healthy water be guaranteed.

Clause
New Māori value and new threatened species values - please refer to questions 13-16 on page 36 and question 22 on page 52 of the discussion document

Notes
13. Do you think either or both of these proposals will be effective in improving the incorporation of Māori values in regional freshwater planning Yes, both

Clause
Exceptions for major hydropower schemes - please refer to question 19 on page 36 of the discussion document

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19. Does the proposal to allow exceptions for the six largest hydro-electricity schemes effectively balance New Zealand’s freshwater health needs and climate change obligations, as well as ensuring a secure supply of affordable electricity? No. Each hyro-electricity scheme should be considered separately and a reasonable management plan devised to provide environmental flows and fish passage. Also the National Policy Statement for Forestry Practice (NPS-PF) should take priority over the National Environmental Standards for Productive Forestry (NES-PF), not the other way around. The NES-PF has weak wetland rules and puts these most scarce ecosystems at further risk for decline. Exempting hydro and forestry also creates a bad precedence whereby industry “pulls rank” over the environment. If we can’t live within our environment, then we need to change our ways.