Your submission to Action for healthy waterways - consultation

Adele Coombs, Orari River Protection Group (Adele Coombs)

Reference no: 1196

Submitter Type: NGO

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

Notes
We believe the proposals set out in the Action Standards for healthy waterways will help to stop further degradation of New Zealand's freshwater. However, we would also like the national government of NZ to: 1. Set higher standards for the use of agricultural chemicals that can leach into waterways 2. Introduce a national law protecting native fish species 3. Have policies to prevent run-off from winter grazing into waterways 4. Have a policy for fencing all waterways off from farm animals, including remaining wetlands, especially in the high country 5. Prevent any further intensification, including the “moving up” of fertilised areas into high country tussock country.

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

Notes
It would be great if the NZ government could support groups like ours to protect all our rivers and streams in the following ways: 1. Provide support and assistance to monitor the health of our waterways with testing for contaminants (Lincoln University offered this help to groups like ours, but then retracted their assistance). We purchased our own kit and try to seek help and advice from ECan water scientists in Mid Canterbury, but we cannot afford to test for contaminants or even nitrates due to the high cost of these tests. 2. We would like to see all our rivers and waterways fenced from stock, especially upper catchments, to retain their higher water quality. This would support the work we already do in the upper Orari catchment to control gorse and broom and encourage the regeneration of native plants to support the rare fauna still living there.

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

Notes
We believe an independent national water body would manage freshwater better than organisations like ECan, who have over-allocated rivers in Canterbury for irrigation and still have not pulled back on this even after all their years of planning for better management of rivers in Canterbury.

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

Notes
We support the Te Mana o te Wai principles. It would be great if these principles could underpin freshwater policies in NZ.

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
YES! We support the proposal for a faster freshwater planning process. The current Plan Change 7 in Canterbury would only see a 10% improvement to “hot spots” or areas highly contaminated with nitrogen from intensive farming within 5 years after 2025! This is terribly inadequate, as our rivers and streams are in a terrible condition in Canterbury and need to be improved much sooner than this.

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

Notes
We do not support further dams for hydro-power schemes, as dams release high amounts of greenhouse gases and change the eco-system in many ways that impact bio-diversity. Rivers need to flow unimpeded to the sea for many of our native fish species to breed, including eels. Many of our fish species are threatened, so this is vitally important to their survival. We support a compulsory national value for threatened native fish species. We also support legislation to protect native fish species.
Clause
Nitrogen, phosphorus, and sediment attributes - please refer to questions 20-21 and 30-35 on pages 52 and 53 of the discussion document
Notes
We support the introduction of national standards for nitrogen and phosphorous, to protect human health as well as the health of indigenous fish species that are declining with current conditions.

Clause
Ecosystem health policies - please refer to questions 23-29 on pages 52 and 53 of the discussion document
Notes
We support the proposal to protect remaining wetlands. Many of the wetlands in the Canterbury & McKenzie high country have disappeared or are severely impacted by stock on farmland that is moving higher and higher, encroaching on the natural tussock-land. This tussock country filters and sequesters water, naturally managing water quantity and quality in the rivers and streams flowing down from the high country. It is vital to protect these high country wetlands, and not allow further intensification or forestry to take over these areas, in order to protect our freshwater in Canterbury.

Clause
Ecosystem health attributes - please refer to questions 20-21 and 39 on pages 52 and 53 of the discussion document
Notes
We support the policy for improving eco-system health, and to this standard we would like the national government to include policy on fencing fresh-water ways from farming stock, and ensuring that agricultural chemicals do not leach into our rivers and streams. This would include monitoring farm activities and monitoring water quality in rivers and streams for chemical contaminants as well as nitrates & phosphorous.

Clause
Swimming - please refer to question 36 on page 53 of the discussion document
Notes
We support the recommended approach to improving water quality at swimming sites. We would also like to see water monitoring for agricultural contaminants at swimming sites, including chemicals as well as nitrates and phosphorous.

Clause
Flows and metering - please refer to questions 37 and 38 on page 53 of the discussion document
Notes
We would like to see the concept of "optimum flows" rather than just "minimum flows" for our aquatic biodiversity to do well. If we are aiming for a minimum standard, and our native fish & bird species that rely on optimum water flows in our rivers and streams to survive, then its no wonder that many of them are threatened and endangered. We need to aim higher, and set national fresh water standards at optimum levels for wildlife as well as for human health, not just minimum standards.

Clause
Restricting further intensification - please refer to questions 51-53 on page 80 of the discussion document
Notes
We support the immediate restriction of further intensification, to protect what remains of high country wetlands as well as upper river quality. The rivers in Canterbury are degraded in water quality in their lower reaches due to widespread intensification, and this must not happen any further upstream in the upper river catchments as well! This includes forestry practices in upper river catchments, as this would impact severely on water quality as well as affect remaining high country wetlands.

Clause
Immediate action to reduce nitrogen loss - please refer to questions 58-64 on page 80 of the discussion document
Notes
National policies that restrict the use of nitrate-producing fertilisers would make a significant difference in reducing nitrogen loss and leaching into water bodies. The NZ government could have an advisory body supporting farmers with well-researched information about increasing soil fertility in ways that do not leach nitrates, as there is a large body of information available in this field!

Clause
Excluding stock from waterways - please refer to questions 65-68 on pages 80 and 81 of the discussion document
Notes
We support the exclusion of stock from all waterways, including remaining high country wetlands in the Canterbury and McKenzie districts. We also support the riparian planting of waterways with indigenous plant species to encourage the regeneration of indigenous wildlife, both aquatic and lizards and birds.

Clause
Controlling intensive winter grazing - please refer to questions 69-70 on page 81 of the discussion document
Notes
We support nationally-set standards for controlling winter grazing. This needs to include monitoring from local authorities for compliance.

Clause
Other comments on the proposed National Environmental Standards for Freshwater - please refer to questions 76-78 on page 81 of the discussion document

Notes
We support time-frames that are sooner rather than later for implementing the new national standards for fresh water. Our deteriorated water quality, threatened wildlife, and human health depends on this.

Clause
Policy interactions - please refer to questions 79-80 on page 101 of the discussion document

Notes
We recognise that there are potential areas for tension between new national standards for fresh water quality and the previous standards, which allowed our rivers to deteriorate and much of our wildlife to struggle to survive. We sincerely appreciate the efforts of this government to address the problems and provide national standards for regulating water use and quality. We believe that education is the best way forward, and recognise that good information is needed across all sectors to ensure people are properly informed about the effects of current farming practices and better alternatives. We are disappointed that much of the information reaching the farming sector is promoted by agricultural fertiliser or chemical companies, so is industry-driven. The formation of a national commission, or independent organisation to ensure a wider body of information reaches the farming public could help with this. Also the introduction of environment studies at high school and even primary school level could help set the course for our young people to learn broader ways of thinking and approaching different farming and environment practices.