Submission on Action for healthy waterways

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To the Minister for the Environment

Thank you for the opportunity to submit on the freshwater proposals.

Introduction

Mackenzie Guardians Inc. Mackenzie Guardians became an Incorporated Society in October 2009. Mackenzie Guardians is a community group which was formed in response to many applications to take, use and discharge water in the Mackenzie Basin. Members of the Society live in the Mackenzie region, and throughout New Zealand. The rivers, lakes, aquifers, and associated ecosystems in the Mackenzie Basin are highly valued by our members.

The objectives of the Society are to:

Promote the protection of the naturalistic wildlife, water, vegetation, heritage and landscape values of the Mackenzie Country.

Water quality is one of the most important environmental issues facing New Zealand today. Over the last 10 years intensive farming in the Mackenzie Basin, driven by irrigation consents, has resulted in declining water quality.
Mackenzie Guardians (MGs) welcome the proposed freshwater reforms and thank the Minister and the Government for strong action to improve the state of freshwater in NZ. Without urgent action water quality in the Mackenzie will likely continue to decline.

MGS support the proposed new requirements set out as follows:

1. **Strengthen framework for freshwater management**  
If priority is given to the health and wellbeing of waterbodies all other public health and public good (including economic) values will be protected.

Outcome sought:  
**Support** strengthening Te Mana o Te Wai as the framework for freshwater management.

2. **Support better and stronger provisions for ecosystem health**  
Currently freshwater is not being managed to protect ecological health or adequately protect habitats of threatened indigenous species. In many rivers the limits set are toxic to indigenous fish species.

MGs welcome the proposed national bottom lines to limit nitrogen in waterways and support healthy ecosystems. Plans to achieve these bottom-lines must be strong and must be part of the regional plan, the action plan, not a separate document with no teeth.

MGs support the science and technical advisory group’s (STAG) recommendations in relation to periphyton and nutrient criteria.

Outcomes sought:

- All attributes for ecosystem health be made compulsory and strong bottom lines be set out in the draft NPS-FM.
- Proposed bottom line for nitrogen in rivers be set at an average median of 1.0 milligram nitrate-nitrogen per litre.
- A new compulsory national value for threatened indigenous species.
- Require regional councils to set targets for existing attributes, and the proposed new suspended sediment and nutrient (nitrogen and phosphorous) attributes to ensure water quality is maintained and improved.
- Require regional councils to measure and monitor a broader range of ecosystem health attributes.
3. Support better protection for wetlands

Outcomes sought:
- Ensure there is no further loss of natural wetland ecosystems on public and private land (92% of natural wetlands have been destroyed, all that remain are significant).
- Regional councils identify all existing natural inland wetlands and put tighter controls, monitor their health, and set policies to protect them.
- Tighter controls on activities that damage wetlands.

4. Support better protection of drinking water

High nitrate levels in drinking water is of increasing concern. This is now a major public health issue.

Outcomes sought:
- Policies to better manage water to meet people’s potable water needs and make water safe for drinking.
- Councils to assist communities and individuals with water currently contaminated with nitrates to treat or find access to nitrate free drinking water.

5. Support the restriction of high-risk farming activities and limit agricultural intensification

Over the last 20 years intensive agriculture (irrigation and indigenous vegetation removal) in the Mackenzie Basin has resulted in degraded landscape values and permanent loss of unique ecosystems. The Mackenzie has now reached a landscape and ecological tipping point.

As well as the adverse effects of nutrient runoff to surface and groundwater systems, the ‘edge effects’ of large-scale irrigation on dryland eco-systems are yet to be determined. MGs support the rules on controlling high-risk land use practices and recommend adopting the strongest standards in all instances. MGs support tighter restrictions to limit any further agricultural intensification and large-scale irrigation in the Mackenzie.
Any future resource consents triggered by the high-risk land use thresholds should be publicly notified and all new consents should be considered as non-complying and undergo full public consultation before being granted.

Water quality definitions should refer to the quality that existed before agricultural intensification was ramped up in the Mackenzie. Water quality around this time is still easy to determine and well within the memory of local people, recreationalists, fishermen, campers, tourists and other visitors to the area.

Outcomes sought:

- Tighter restrictions on irrigation and resulting nutrient runoff to rivers, lakes, aquifers, and to dryland ecosystems in the Mackenzie Basin.
- Publicly notify all new consents triggered by high risk thresholds and these consents to be processed as a non-complying activity.
- Proposed bottom line for nitrogen in rivers be set as defined based on current scientific evidence i.e. an average median of 1.0 milligram nitrate-nitrogen per litre.
- Definitions of ‘current water quality’, ‘existing water quality’ and ‘maintain water’ to refer to water quality as it existed in 1991.
- Exclude farm animals from rivers, streams and lakes.
- Use scientific evidence to determine if a 5-metre setback is an adequate distance to prevent nutrient runoff leaching to rivers, streams and lakes.
- Require planting of river and stream margins on farms.
- Support the recommendations to manage winter grazing. Prohibit the practice on soils with preferential flow pathways to rivers, streams, lakes and aquifers.

6. **Support improved farm management practices.**
Mackenzie Guardians support farm plans but additional to and not in place of strong, effective rules to better protect and improve water quality/quantity. MGs oppose industry self-regulation. So far it has not worked, it’s been a failure. MGs support excluding stock from waterways and fencing streams on farms that are under 1 metre wide. Research shows that 77% of contaminants in our waterways enters from streams less than 1m wide.
Outcomes sought:

- Require farm environment plans but not in place of strong, enforceable rules to improve water quality.

7. Oppose exemptions for hydroelectricity and forestry.

Hydro and forestry should not be singled out for exemption. All industry should be required to stop the degradation of freshwater, and work to maintain healthy ecological flows in all water ways.

Outcome sought:
Delete exemptions for hydro and forestry.

Conclusion
All New Zealanders have a right to clean water. It will take a joint effort and strong leadership if NZ is to reverse the current degradation of our freshwater for current and future generations. Mackenzie Guardians ask the government to provide more support for the transition to more sustainable land uses.

Thank you for considering our concerns, and we look forward to stronger regulations, cleaner water in future and the ongoing protection of our freshwater and our environment.

Mackenzie Guardians support the submission of the Royal Forest and Bird Protection Society.

Signed:

Personal Secretary)
Personal details (Committee)