New Zealand is blessed with astonishing beauty, natural resources and clean and abundant water. Our environment is the envy of other nations (and the source of our tourism industry), but we are systematically destroying it.

We cannot continue to trash our waterways for short term economic gains. Beyond the broad societal benefits of a healthy and flourishing environment, New Zealand’s long term economy, both tourism and industry, ultimately depend on the health of our environment.

It’s time that we as a nation take firm action.

We need proper safeguards to protect our waterways from further pollution and exploitation, so they are safe for swimming, fishing and gathering food. I need this, my family needs this, and the future generations of New Zealanders need this.

I want effective rules which protect the environment and every New Zealander’s right to clean water.

Those rules need to be appropriately enforced by central and regional government because, at the moment, many regional councils are failing us.

The Action for Healthy Waterways documents are an essential step in the right direction – but only if the right options in the consultation document are chosen.

It is vital that the Government holds firm on imposing regulation, and does not fall back to an industry self-regulation model. Industry self-regulation has, to date, fundamentally failed to protect our waterways.

More oversight and regulation, as proposed in this freshwater package is required to restore the health and vitality of New Zealand’s freshwater.

I submit that the definitions of ‘current water quality’, ‘existing water quality’ and ‘maintain water’ should refer to water quality as it existed in 1991. Since 1991 regional councils have had the job to maintain water quality under the RMA and we should not permit their failures over the past 28 years to shift the baseline of water quality. Councils should already have data on the state of freshwater in 1991. If they don’t, then their communities -will be all too willing to remind them what their rivers, lakes and wetlands looked like 28 years ago.

Trout and salmon are valued species for a huge number of New Zealanders. They provide an incredible recreational resource and support a thriving tourism industry, as well engendering significant environmental advocacy. The protection afforded to the habitat of trout and salmon under s7(h) is a matter that all decision-makers must have particular regard to. The draft NPSFM needs to make more specific recognition of trout and salmon to ensure this valuable resource is properly provided for. Specifically, in trout spawning reaches (as defined in Sports Fish and Game Management Plans - SFGMP), the fine deposited sediment should be less than 10% cover. In trout fishery reaches (also in SFGMP), trout should be positively included in the fish index of biotic
integrity, they should have flows that provide for their populations, and their migration pathways must be provided for. Finally, it needs to be made clear that trout and salmon should not be considered ‘undesirable species’ by councils.

I strongly support the inclusion of the precautionary principle. We know from international experience that using the best available information at the time, despite uncertainty, yields better environmental outcomes than doing nothing.

I welcome the proposed nitrogen limits (DIN). For the first time the national bottom line is to be set at a realistic level to support a healthy ecosystem. The new attributes (indicators of ecosystem health) to be monitored and maintained or improved are welcomed. We are to manage for healthy rivers then we need attributes on nutrients, sediment, fish, invertebrates, plants and algae, dissolved oxygen and ecosystem metabolism. The plans to achieve these bottom-lines must be strong too. They must be part of the regional plan and not a separate document that is forgotten because it holds no weight. The regional plan is the action plan.

To date, councils have failed or struggled to implement the existing periphyton (slime) attribute correctly. I support the science and technical advisory group’s (STAG) recommendations to alter this table and provide default nutrient criteria for councils to use. Having nutrient criteria as guidelines is not enough given councils have failed to use existing guideline values.

Wetlands have enormous biological value and benefit society greatly. Studies in New Zealand suggest that an average hectare of wetland provides approximately $30k per annum worth of benefits to society (ecosystem services). I support the new rules to stop the degradation and loss of wetlands. However, we have already lost over 92% of wetlands, with most of the remaining wetlands suffering poor ecological health. I submit that the two wetland attribute tables recommended by the STAG be included in the NPS. One will drive improvement to a minimum level of health, the other will drive an increase in wetland extent. The scientists have told us these are minimum requirements for healthy wetlands – we should listen and act.

I support the stock exclusion rules and request that streams under 1m wide also be fenced on intensively farmed land. Research shows that 77% of contaminants in our waterways enters from streams less than 1m wide.

I strongly oppose the exemptions for hydro-electricity and forestry. Hydro-electricity generators should do their part, like everyone else. Overseas, hydro-generators can provide environmental flows and fish passage, and still be profitable and stable. The NPS-FM should take priority over the NES 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.

Whilst the new goals will result in meaningful outcomes for our waterways, they must be achieved within meaningful timeframes. I support the ambition for healthy waterways within a generation; however, this needs to be defined. I submit that a generation be defined as no more than 30 years. I want my children to experience healthy waterways within their lifetime.

I support the new E coli standards for swimming sites. However, these standards for primary contact
should apply everywhere, not just swimming sites, and all year-round. Primary contact is more than just swimming. Our rivers should be safe no matter we go.

I support the rules on controlling high-risk land use practices and recommend adopting the strongest standards in all instances. I also support the recommendations on intensive winter grazing to provide cows a dry place to lie (this reduces erosion) and not allow the practice on soils (including mole and tile drained) with preferential flow pathways. I also want to be able to have a say on any resource consent triggered by the high-risk land use thresholds, I request that all new consents be considered as non-complying and undergo full public consultation before being granted.

I know the goals will be tough, but we must hold strong and resist temptation to water them down. Instead we need to help each other achieve them. I urge the government to provide more support for the transition to more sustainable land uses. I also recommend that the government establishes a national wetland re-creation fund. In addition to the biodiversity and waterfowl values, wetlands are the ‘kidneys of the land’ and can attenuate enormous amounts of nitrogen, phosphorus and sediment.

I respectfully request that you take my concerns, and the concerns of the majority of New Zealanders’, to heart and provide the strong leadership necessary to protect our national treasures. You are fighting for all Kiwis, including future generations, who want these taonga - our freshwater and environment – properly protected.

Yours sincerely,