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

**Notes**
Overall, support main objectives to stop further degradation of waterways and start making immediate improvements so that water quality improves within 5 years, and to reverse past damage and bring waterways and ecosystems to a healthy state within a generation.

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

**Notes**
Support current and new attributes from the Science and Technical Advisory Group in their strongest proposed forms. Especially support the addition of dissolved inorganic nitrogen (DIN) with a bottom line of 1mg/L, sediment, and a wetland extent and wetland condition index.

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

**Notes**
Support the dates set for planning timeframes for councils being 'hard wired' into the NPS (notified by 2025). However, timeframes for achieving bottom lines should be hardwired also (even if for severely degraded catchments this might be set in the long term of 50+ years). This is in line with the aim to achieve healthy ecosystems within a generation. In Canterbury we've seen community consultation processes that inform the plans being crippled by arguments over 'how much' improvement should we aim for and over what timeframe? When push comes to shove, short term economics trumps other values. Shared sentiment about 'us all wanting environmental improvement' doesn't cut it - if the aim is an ecologically functional environment (and there is already consensus within the scientific community and now proposed in the NPS FM and NES about what those standards are) then let's agree that's what we're aiming for and get on with achieving it by setting clear goals AND a timeframe for achieving them. This will provide certainty of investment in what's expected for farmers, industry and cities and will drive the innovation and drivers for change within the agricultural and urban communities that are urgently needed.

## 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**
Require long term reporting - 10 year trends are inadequate where often freshwater bodies have seriously degraded prior to 10 years ago and have now stabilised in their degraded state. Such sites are now often recorded as 'no change' as part of 10 year 'trend reporting', which is completely misleading and useless when used to inform limit setting.

## 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**
Support, in principle, establishing the hierarchy of obligations under Te Mana o Te Wai and the general intent to prioritise the health and well-being of waterbodies and freshwater ecosystems. However, the implementation of upholding Te Mana o Te Wai must be culturally and ecologically meaningful. Many rivers in Canterbury have minimum flows set below ecological limits and over allocation of water means cultural values and practices such as mahinga kai continue to suffer and degrade. The plans should rectify this within the life of the plan (i.e. 10 years) or a set timeframe set out in the National Policy Statement for Freshwater Management (NPS-FM).

## Clause
**Ecosystem health policies - please refer to questions 23-29 on pages 52 and 53 of the discussion document**

**Notes**
Support urgently bringing the highest polluters down to reasonable levels through rules that target high-polluting activities. Support the proposal to protect remaining wetlands, and would support a higher prioritization of fish passage requirements, including
retrospective action on existing barriers. Support strengthened protection for wetlands, streams and indigenous ecosystems including fish passage. What constitutes a wetland should be clearly defined and provide clarity on the difference between wetland and wet pasture. Seek a more enabling framework for activities related to the enhancement of wetlands. Additional regulatory requirement may discourage people from undertaking enhancement activities such as earthworks and vegetation clearance, and redirect investment into getting consent rather than doing the enhancement. Support the inclusion of threatened ecosystems and mahinga kai values as compulsory values that should be considered in limit setting processes.

**Clause**
Ecosystem health attributes - please refer to questions 20-21 and 39 on pages 52 and 53 of the discussion document

**Notes**
Oppose basing rules for future activities on current levels of pollution as this could lock in current destructive practices and reward the highest polluters

**Clause**
Swimming - please refer to question 36 on page 53 of the discussion document

**Notes**
Support improving standards for swimming and including bottom lines for swimming standards.

**Clause**
Restricting further intensification - please refer to questions 51-53 on page 80 of the discussion document

**Notes**
Suggest that ‘passing’ an FEP audit should be a requirement. The NES proposes that it is merely necessary to have an audit completed and to inform the council of the result. It is unclear what Regional Councils are meant to do with that information as passing is not necessarily a requirement.

**Clause**
Farm plans - please refer to questions 54-57 on page 80 of the discussion document

**Notes**
Support urgently bringing the highest polluters down to reasonable levels through rules that target high-polluting activities. Proposed stock exclusion must be bolstered. ECan’s operative Land and Water Regional Plan already includes rules to exclude livestock from waterways which are more restrictive than the proposed regulations and have already gone through public hearings and before an independent hearing panel.

**Clause**
Immediate action to reduce nitrogen loss - please refer to questions 58-64 on page 80 of the discussion document

**Notes**
Oppose basing rules for future activities on current levels of pollution as this could lock in current destructive practices and reward the highest polluters. Support a prohibition on conversions to highly polluting land uses and restricting high-polluting activities such as intensive winter grazing, until councils have a plan on how to fairly manage pollution within environmental limits.

**Clause**
Excluding stock from waterways - please refer to questions 65-68 on pages 80 and 81 of the discussion document

**Notes**
ECan’s operative Land and Water Regional Plan already includes rules to exclude livestock from waterways which are more restrictive than the proposed regulations and have already gone through public hearings and before an independent hearing panel.

**Clause**
Controlling intensive winter grazing - please refer to questions 69-70 on page 81 of the discussion document

**Notes**
Strongly suggest a much more conservative limit is appropriate for winter grazing, given this will be a permitted activity rule. Proposed stock exclusion must be bolstered

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