Your submission to Action for healthy waterways – consultation

Reference no: 1576

Submitter Type: NGO

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

Notes
Whilst we applaud the determination to improve the health of our waterways, we feel the proposed actions do not go far enough in some areas. The focus on improving waterway health is a welcome change. The timeline for improvement of our waterways is heartening if it is achieved.

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

Notes
The focus on pro-active management is welcomed. Too often in the past action has only occurred when problems become apparent. The requirement on regional councils to monitor a wider variety of attributes is a step in the right direction.

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

Notes
The provision of fish passages with new structures is welcome but we would like to see a process where existing structures are audited and where problem are found there is a plan to alleviate them. The emphasis on protecting wetlands is long overdue. We would like to see further emphasis on restoration of wetlands that have already been lost.

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

Notes
We approve of the move to introduce new attributes and bottom lines for waterway health.

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

Notes
We approve of the clarity provided by the introduction of a limit on E. Coli where people popularly swim but feel protections should be extended beyond the indicated dates and to waterways where it is possible to swim not just where it is popular.

Clause
Flows and metering - please refer to questions 37 and 38 on page 53 of the discussion document

Notes
Clarifying requirements around low flow rates is welcomed. We would also suggest that the regulatory framework is amended to ensure councils can modify existing consents to ensure stated outcomes are achieved. Some current allocation limits have been set without regard to waterway health or in the absence of pertinent scientific data and councils seem unable to address these shortcomings in a timely manner.

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

Notes
Of major concern is the requirement for farm environmental management plans. This approach to self-management by farmers is far from ideal. Our experience with FEMPs in the Tukituki catchment suggests they are seen by land users as an easy option and, once completed, are regarded as ‘job done, don’t need to do anything else’. The fact that these FEMPs have been done by fertiliser companies reduces the confidence in them. Additionally, the fact that these plans are not held by the council and therefore are not able to be scrutinised by the public erodes confidence in them and means it is not possible to tell if there is sufficient change in farming practice to alleviate problems identified.
**Clause**
Excluding stock from waterways - please refer to questions 65-68 on pages 80 and 81 of the discussion document

**Notes**
We agree with excluding stock from waterways and believe 5 meters should be considered a minimum for waterways of all size. Research is suggesting that excluding stock alone does lead to the outcomes desired unless riparian planting is included in order to shade water and reduce water temperature.

You have elected to withhold your personal details from publication.