Your submission to Action for healthy waterways – consultation

Submitter Type: NGO

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

Notes
Q 1-2 Yes, the proposals should help to stop further degradation of NZ’s freshwater resources with water quality improving within the specified timeframe. However, we are concerned that industry and farming groups will continue to undermine the scientific basis of the proposals by using half-truths, misleading information, hearsay, fake news and green washing to allow them to continue poor operational practices and management with the continued externalisation of the costs of pollution, runoff, nutrients off-loads and sediment into waterways. Q3. Little improvement due to the role of Auckland Transport in mismanaging waste water and stormwater runoff plus the continual development of urban subdivisions with inadequate protection against sediment runoff. In addition, the failure to update broken and overloaded sewerage and stormwater infrastructure.

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

Notes
Q 4 - 5 The most important role is to ensure that actions are based on the best scientific knowledge possible. Q 6 Prevent the collection and use of rainwater or grey-water for uses such as watering gardens

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

Notes
Q 7 An independent national body is strongly supported.

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

Notes
Q 9 Strongly support the Te Mana o te Wai hierarchy of obligations. Q 10 If fully implemented yes. Q 11 Yes, but this section needs to include Council controlled organisations, Q 12 Hopefully, provided politics do not overwhelm the proposals resulting in short-term private economic imperatives dominating environmental, biodiversity and social imperatives.

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
Q 17 Support the advisory groups comments

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
Q 13-16 Support Kahu Wai Maori comments supporting Proposal 1

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

Notes
Q 19 Strongly support KWM and FLG advisory groups opposition to exemptions including the six largest hydro-electricity schemes. NZ can supply its renewable energy needs not only from hydro but by solar and wind. including DER systems.

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
Q 20 - 21 and Q 30 -35 Strongly support the four advisory groups comments on these questions.

Clause
Ecosystem health policies - please refer to questions 23-29 on pages 52 and 53 of the discussion document
Notes
Q 23 -29 Strongly support the advisory groups comments on these questions.

Clause
Ecosystem health attributes - please refer to questions 20-21 and 39 on pages 52 and 53 of the discussion document
Notes
Q 20 - 21 Support the advisory groups recommendations.

Clause
Swimming - please refer to question 36 on page 53 of the discussion document
Notes
Q 36 Support the proposal but agree with STAG and RSWS that the proposed Quantitative Micorbial Risk assessment be urgently completed.

Clause
Flows and metering - please refer to questions 37 and 38 on page 53 of the discussion document
Notes
Q 37 Agree with advisory groups comments but are concerned with the slowness of the proposal.

Clause
Drinking Water National Environmental Standards - please refer to questions 43-45 on page 56 of the discussion document
Notes
Q 43 Yes.

Clause
Stormwater and wastewater - please refer to questions 46-50 on page 62 of the discussion document
Notes
Q 46 - 49 Support the proposals but want these extended to specifically include Council controlled organisations.

Clause
Restricting further intensification - please refer to questions 51-53 on page 80 of the discussion document
Notes
Q 51. Strongly support KWM and FLG's comments that support a 10 year moratorium on further intensification of land use and further consumptive water takes. Q 52 Support Option 1 but believe it should include a clause to reduce discharge levels if they are above recommended discharge levels for nitrogen, phosphorous, sediment or pathogens. Q 53 Do not support the concept of headroom given the appalling state of the nation's freshwater resources.

Clause
Farm plans - please refer to questions 54-57 on page 80 of the discussion document
Notes
Q 54 - 57 Support the positions of FLG, KWM and RSWS on these questions.

Clause
Immediate action to reduce nitrogen loss - please refer to questions 58-64 on page 80 of the discussion document
Notes
Q 58 Prefer Option 2. Do not support the exclusion of high nitrogen level catchments and the reliance on regional councils for enforcement given their poor track record. Q 61 Are concerned about the failure to enforce existing regulations by local and regional councils on freshwater, waste water and stormwater management. What will happen to ensure that councils and council controlled organisations change their behaviour? Q 62 Support nationally set standards. The comments by the advisory groups warrant support.

Clause
Excluding stock from waterways - please refer to questions 65-68 on pages 80 and 81 of the discussion document
Notes
Q 65 Absolutely. Stock simply do not belong in waterways. The advisory groups comments should provide the base for recommendations.
### Clause
Controlling intensive winter grazing - please refer to questions 69-70 on page 81 of the discussion document

### Notes
Q 69 Prefer Option 1 nationally set standards. Support the advisory groups recommendations.

### Clause
Feedlots and stock holding areas - please refer to questions 71-75 on page 81 of the discussion document

### Notes
Q 71 Support the restriction on feedlots and their need to obtain resource consent. Q 72 Yes. Agree with the advisory groups that national regulations are required for stock-holding areas.

### Supporting documents from your Submission

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