Submission of Water Safety New Zealand on the Action for Healthy Waterways Review

Introduction

1. Thank you for the opportunity to comment on the Action for Healthy Waterways Review. Water Safety New Zealand (WSNZ) supports amending the National Policy Statement for Freshwater Management and would like to explore how it can be effective in protecting people’s health and safety.

2. WSNZ is the recognised leadership organisation for the water safety sector and it has the central policy and advocacy role for the sector. WSNZ also represents the sector and has a specific mandate to support the capability development of sector organisations and the wider sector. WSNZ is also an enabling organisation: it funds and supports, rather than delivers, drowning prevention initiatives.

3. We would like to note that while the discussion document refers to recreational use of freshwater, no reference is made to water safety or drowning prevention. This is a major omission.

Key Policy Issues

Te Mana o te Wai

4. The discussion document states that the proposed reforms will have significant social impacts through improving water quality and providing for Te Mana o te Wai, these include:
   - Impacts on people’s wellbeing, such as better physical and mental health, and the avoidance of water borne illness; and
   - Increased access to valued natural resources, including for cultural purposes and recreation.

5. WSNZ supports the proposal to require all councils to give effect to Te Mana o te Wai, and the recommendations from Te Kahui Wai Maori that mandatory measures of Māori wellbeing are included. It is our view however that a water safety aspect should also be included in Te Mana o te Wai.

6. There are a high number of preventable drowning deaths in freshwater in New Zealand each year. Over the last 10 years 31% of preventable drownings in New Zealand were in freshwater. Te Mana o te Wai provides a perfect platform to address these statistics on a national level. In order to fully ensure that the reforms will have the intended significant social impacts a focus on drowning prevention needs to be included.

7. The National Policy Statement for Freshwater Management proposes higher standards for swimming in summer and WSNZ is supportive of greater efforts to reduce contamination where people want to swim. In addition to this, however, WSNZ proposes that the National Policy Statement is widened to include drowning prevention. For people to be fully able to enjoy activities on, in, and around the water they must be safe from the risk of drowning. WSNZ believes there is scope for freshwater safety and drowning prevention to be included in the National Policy Statement for Freshwater Management.

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8. WSNZ is supportive of the proposal to require all councils to give effect to Te Mana o te Wai. The Action for Healthy Waterways advisory group Te Kahui Wai Māori comments;

“Implementing Te Mana o te Wai will ensure that New Zealanders can connect with water again; that they can swim in rivers, source and consume food from freshwater, and will no longer have their health and safety at risk from contact with water.”

9. A water safety component that encompasses drowning prevention must also be included within Te Mana o te Wai if New Zealanders are to be fully able to connect with water without risk to their health and safety. In this context, WSNZ recognises that Māori have an intimate connection to wai (water) and it is central to Māori identity, health and wellbeing. Despite this deep connection to water, Māori are overrepresented in New Zealand’s drowning statistics. Recent doctoral research on Māori water safety by Dr Chanel Phillips at the University of Otago proposed a new way of viewing the relationship Māori have with water based on a kaupapa Māori approach. The Wai Puna model of Māori Water Safety and Health encapsulated the importance of Māori connection to water through three core concepts:

**Whakapapa** – the source of Māori water safety knowledge

Māori knowledge about water safety is traced through genealogy and the associated physical and spiritual connection to place.

**Mātauranga** – the body of Māori knowledge about water safety

Māori knowledge about water safety is derived from Māori ways of knowing, such as oral narratives, and being in the water.

**Tikanga** – the application of Māori water safety knowledge

Māori knowledge about water safety is applied through tikanga - customs and protocols – the distinctive Maori way of doing things.

10. The Wai Puna model emphasises the importance of Māori connection to water as the premise for understanding water safety from a Māori viewpoint. It also proposes that improving Māori water safety outcomes is linked to helping Māori modify their behaviours around water based on a strengthened connection to wai. WSNZ believes there are strong reasons to use New Zealanders’ connection to water as a key a driver for water safety promotion within Te Mana o te Wai

**Mahinga Kai and Mandatory Maori Measures of Wellbeing**

11. WSNZ agrees that mahinga kai should be elevated to a compulsory value. This would require councils to enable and support mahinga kai values in their local catchments. However, many New Zealanders (particularly Māori) die from preventable drowning incidents each year while gathering kai. WSNZ would like to see a focus on drowning prevention and water safety included in the Mahinga Kai freshwater value.

12. WSNZ is supportive of mandatory Māori measures of wellbeing as recommended by Te Kahui Wai Māori and the statement that water is culturally important for Māori and tied to Māori identity, health and wellbeing. Reducing high rates of drowning among Māori as well as strengthening Māori connection to water should be a priority. WSNZ has identified Māori as a group for which targeted water safety interventions should be developed as Māori were 22% of preventable drownings over the last 10 years, while representing only 15% of the total population.

13. WSNZ is a working collectively with Tangaroa Ara Rau - a collective of Māori water safety specialists - to develop new initiatives to improve WSNZ’s contribution to Māori drowning prevention outcomes.

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14. WSNZ therefore supports the proposal to give effect to Mahinga Kai, however this should include public safety while gathering kai as well as the proposed water quality aspect.

**Flood Risk Management**

15. Although the discussion document refers to sediment build-up and efforts to reduce this, there is no mention of flood risk management. As the purpose of the Resource Management Act 1991 (RMA) is to provide sustainable management of national and physical resources, it cannot be considered a full review if all aspects of freshwater management are not included.

16. Natural Hazard protection, against things such as such as surges and floods, the actions of which adversely affects, or may adversely affect, human life, property or other aspects of the environment needs to be covered within this review. River flooding hazards pose a great risk in terms of potential loss of human life, yet this is not recognised anywhere within the Review document. Rivers transport a large amount of water and sediment and are continually changing, these changes lead to disrupted flow, increased flood risk and increased hazards to people’s lives.

**United Nations Drowning Prevention Group**

17. WSNZ’s position on freshwater safety aligns with that of the United Nations Drowning Prevention Group. This group urges Governments worldwide to focus not only on water quality but also drowning prevention and to recognise the importance of safe access to water alongside access to safe water. The United Nations Drowning Prevention Group aims to mobilise governments from across the geographical and political spectrum to act on this common cause: to ensure that the issue of drowning prevention is recognised and receives resources commensurate with its impact on communities worldwide.

18. Urgent action is needed, not only to stop water quality degrading, but additionally to stop the large number of preventable drownings that take place in freshwater each year. Not only should the quality of water be first in decision making, protecting human life should be too. WSNZ would welcome working in collaboration with both central and local government to assist with including drowning prevention and water safety in the National Policy Statement for Freshwater Management.

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