Your submission to Action for healthy waterways – consultation

Secretary of Living Waters BOI, Living Waters- Bay of Islands, the catchment working group of Bay of Islands Maritime Park Incorporated Society. (Chris Richmond)

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Submitter Type: NGO

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

Notes
These proposals should stop further degradation of most freshwater resources, except those surface waters that are largely fed by deep, old groundwater or aquifers. My research on the Rotorua Lakes and Taupo in the 1980s showed that nutrient contamination of deep groundwater had taken place 30-50 years prior to emergence in springs and upwellings. Surface waters so impacted will not improve significantly within a generation unless substantial reforestation is undertaken on leaky catchment lands. In such cases, compensatory offset works may need to be undertaken in complementary locations, such as restoration of floodplain functionality to better trap and sequester suspended sediment, nutrients (and carbon, as a bonus). For Bay of Islands and other Northland waterways, these proposals will hopefully sharpen the policies and rules in the Proposed Regional Plan for Northland which is currently under Appeal. Because this proposed Regional Plan has no non-regulatory methods, it will be difficult to enforce the use of the operational methods that the national proposals envisage. In such situations, the Crown may need to require rules in Plans that regulate the actions of Regional Councils themselves. Another limitation of the current proposals is that they take little account of the downstream impacts in estuarine and marine habitats of contaminated freshwaters, whereas the impacts of rivers and groundwater on lakes are considered. Better integration of the management of fresh and marine waters is recommended for both national and regional planning.

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

Notes
The responses of Living Waters-BOI to implementation of the proposed measures would likely include encouraging the Northland Regional Council to collaborate with DOC and District Councils and NGOs like ours to prepare applications to MfE to assist with funding comprehensive catchment restoration plans for the other main watersheds flowing into the Bay of Islands, especially the Kawakawa-Taumarere which contributes 80% of the suspended sediment from 40% of the catchment area. Other likely actions would include continuing with our own projects restoring native biodiversity and natural hydrology to floodplains, wetlands and riverine riparian zones to contribute to water quality improvement and impact mitigation. It would be great if central government could again assist financially in these local initiatives through appropriate contestable funding, especially if the objectives were wider than swimming water quality and the reporting requirements were less onerous than the Community Environment Fund (from which we received $80,000 to get started). The main unintended consequences of the proposals may be to place too much emphasis on the mana of the wai, rather than the mauri of the wai. Although the implementation of the programme will require people to take action (he tangata?) I think the outcomes should be focussed on the health or lifeforce of the wai, rather than on the prestige of the water body and its kaitiaki. There is now, at last, a standard method of measuring and monitoring the restoration of te mau i o te wai, which Dr Kepa Morgan has developed and applied. I wish I had it when I sought Crown POBOC funding for the Restoration of the Mauri of Maketu Estuary in 1988. Meanwhile, I have not yet seen a methodology for measuring te Mana o te Wai.

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

Notes
I have some concerns about the suggested " independent national regulatory Commission". There is a risk of accountability and authority being separated, diluted or made ambiguous. Because achievement of the desired outcomes will require integrated usage of both regulatory instruments and operational tools (such as whole farm plans, catchment restoration plans, contestable funds, etc), plus very careful monitoring and reporting of both outputs and outcomes, it will be essential to design an oversight body that can address this range of issues. One option may be to have a representative forum, a national level equivalent of the Hauraki Gulf Forum, responsible for monitoring, reporting, coordinating and facilitating agreed actions, but it would need to have greater powers to be effective. OTHER COMMENTS: The most challenging water quality issue in the Bay of Islands (and much of Northland) is suspended sediment. While we support the proposal to set standards for suspended sediment in rivers (and hopefully estuaries) we are concerned that the only three erosion/sediment control mitigation methods assessed (by Landcare Research under contract LC3574) were Whole Farm Plans (if fully implemented), riparian exclusion and afforestation. While the report concluded that the combined use of these three tools could achieve sediment bottom-line targets for most catchments, its failure to consider floodplain restoration methods, up-catchment swale and flood detention as well as active management of riparian zones to maximise nutrient uptake and sediment retention, means that optimal methods of management may not be applied (or funded). Recent NIWA research on Northland rivers indicates that many have between 40 and 50% of the suspended sediment being derived from instream bank erosion of largely alluvial material. This is a result of increasing flood peaks causing accelerated meander growth to dissipate energy.
Design of appropriate and effective sediment mitigation packages will require input from both hydrologists and fluvial geomorphologists, as well as Landcare modellers. While the use of wetland and floodplain restoration methods to trap sediment and nutrients may seem like an ambulance at the bottom of the cliff, it will be a necessary complement to up-catchment measures that could take decades to be effective in reducing flood peaks, hillslope and riverbank erosion.