30 September 2019

Ministry for the Environment
Wellington

SUBMISSION ON ‘ACTION FOR HEALTHY WATERWAYS’

The branch represents approximately 760 members and covers an area which includes urban and a wide range of rural landscapes of both flat and steeply hilly country.

Most of the lower land is in horticulture and housing while some bush, pine forests and lifestyle development cover much of the surrounding hill country. Forest harvesting and housing development has caused a continual downward flow of hundreds of tons of soil (Moutere clay) which has covered the beds of streams and estuaries and polluted the waterways with nitrous and other chemical run-off. Estuarine habitats have been adversely affected and some traditional fisheries have disappeared.

Members support radical moves to restore health to fresh water systems.

STREAM SYSTEMS

- Forestry should not be exempt from following the same rules as other businesses and communities. Strong rules and strict systems should apply to enforce regulations to stop soil run-off from forestry and development. There should be no more polluter controlled self-regulation. The time for ineffectual management has long gone.

- Urban stormwater drainage should not be piped or filled in unless there is no other option eg beneath a roadway. Set minimum standards for wastewater discharges and overflows and require all operators to follow good practice. All water should be channelled into streams rather than ditches.

- Fresh waterways must be managed in a way that helps indigenous species thrive with adequate fish passage on all waterways. There should be no exemption for existing structures on public or on private land including dams.

- Hydro dams must build a structure to prevent eels from being destroyed by the turbines. Thousands of eels are being lost this way during their migrations and the problem should be solved without delay.
There should be better management of water allocation within the current system and minimum flows established for all rivers.

Ensure all farmers and growers understand and manage environmental risks and follow good practice and have a farm plan by 2025. These plans must be approved and monitored by an independent qualified authority.

There should be no more intensification of land use without a thorough Environmental Assessment report on the state of the land and catchment downstream of the farm. If the catchment cannot absorb more pollutants there must be a reduction in stock numbers and use of fertilisers.

In catchments with high phosphater/nitrate levels there should be an incremental reduction in nitrogen loss with a sustainable level being reached within five years. Reducing levels of nitrous oxide caused by nitrate pollution will considerably assist with greenhouse gas reduction and this is an urgent matter.

All stock must be excluded from fresh waterways and only light stocking allowed in upper catchments, polluted run-off from these source areas will be cumulative as it flows into the lower waterways.

Fencing and riparian planting will protect the waterways from direct contamination but will not stop effluent soaking into the ground, water-table and aquifers. Considerably reducing stock numbers is the only way to reduce contamination of freshwater supplies. It may be immaterial as to whether riparian planting is 2, 3, or 5 metres wide. Planting has value in shading and cooling the water for the benefit of freshwater species but will do little to protect aquifers.

Stock numbers must be reduced before improvements can take effect. A realistic limit should be set for the numbers of stock allowed in each catchment. Type of soil and slope of land are less relevant as eventually effluent will soak through to groundwater and aquifers.

All councils must receive guidance on how to look after freshwater systems and provide regular accountability to their communities.

**WETLANDS**

Draining or despoiling any remaining wetland, however small, should be banned and monitored. Small wetlands also have value as links in the chain of habitats

Forestry must comply with national regulations on wetland conservation

**WINTER GRAZING**

The practice of intensive winter grazing is environmentally damaging, destroying soil structure and soil organisms. The practice is also cruel, subjecting stock to standing
in deep mud without food or shelter and sometimes having to calve while standing in the mud. Animals would never choose such a situation.

- We strongly oppose stock owner self-regulation but do support rigorous and humane national standards for winter grazing and stock holding areas.

SUSTAINABLE LAND USE

- Some farmers manage land-use well and many grow organically. Others appear to have no idea about the damage they are causing and when confronted have a ‘poor me’ reaction. These are the land users who need clear direction and guidance and, very importantly, regular monitoring.

- Organic growing allows for sustainable treatment of land and should be encouraged - mixed-ley herbage is far more environmentally acceptable than a monoculture of rye grass. Mixed ley is thicker and deeper, retains water for longer and supports a greater variety of beneficial invertebrates and soil organisms.

- Considerable effort is needed to receive Organic Certification and tax or rates reduction would be a reasonable recompense for land users who are certified organic growers.

SIGNED:

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