To whom it may concern,

Thank you for the opportunity to make a submission on government's proposal on Action for Healthy Waterways. We believe that all sectors, regions, and communities must play their part in protecting and restoring the health of our waterways.

It is critical that the government places caps on activity (intensification) that escalates environmental harm, and establishing targets and action plans to restore human and ecological health. We are fortunate to have many examples of where coordinated action and regulation has made a significant difference, including Lake Rotorua and Lake Taupo.

We believe that it is a good idea to have an independent national body to provide oversight of freshwater management implementation on timescales longer than election cycles. This body could be parallel to and possibly sharing membership with the Climate Commission.

Go Eco supports the government to do the following:

- Introduce a new freshwater planning process that will require councils to have new plans in place no later than 2025.
- Strengthen and clarify the requirement to manage freshwater in a way that gives effect to Te Mana o te Wai.
- Restructure and redraft the National Policy Statement for Freshwater Management to improve clarity and reinforce a holistic approach to freshwater management.
- Follow the advice of the Science and Technical Advisory Group and implement pollution standards and bottom lines for ecosystem health. We especially support the addition of the following new measures for the health of our waterways: dissolved inorganic
nitrogen (DIN) with a bottom line of 1mg/L, sediment, and a wetland extent and wetland condition index.

- Strengthen the requirement to identify and reflect Māori values in freshwater planning.
- Broaden the focus of national direction and planning to a more holistic view of freshwater ecosystem health and require better monitoring and reporting.
- Undertake greater efforts to reduce contamination where people want to swim. We support improving standards for swimming and including bottom lines for swimming standards.
- Protect urban and rural wetlands and streams. The protection of wetlands should apply to all wetlands of all sizes including on private land. The forestry industry shouldn’t be exempt from these requirements.
- Protect threatened indigenous freshwater species.
- Provide for fish passage. Many of our native fish swim up and down streams to complete their life cycles. They need clean water and plenty of it. They also need rivers and streams free of barriers.
- Better manage water allocation within the current system
- Strengthen requirements to assess and control risks to drinking water sources.
- Set minimum standards for wastewater discharges and overflows and require all operators to follow good practice risk management.
- Ensure all farmers and growers have a plan to manage risks to freshwater. Farm plans are a useful tool to support decision-making for farmers and land managers. However, clear and effective rules must be prioritised as the best way to achieve the Government’s stated goal of measurable improvements within five years.
- Tightly restrict any further intensification of land use through interim measures until all regions have operative freshwater management plans. We do not support basing rules for future activities on current levels of pollution. We support bringing the highest polluters down to reasonable levels immediately through rules that target high-polluting activities.
- Reduce nitrogen loss in catchments with high nitrate/nitrogen levels through interim measures until all regions have operative freshwater management plans.
- Exclude cattle, deer and pigs from waterways on low-slope land and where stock rates are similar to dairy
- Make vegetation of waterways a requirement so that pollution run-off is kept to a minimum.
- Apply standards for intensive winter grazing, feedlots, and stock holding areas.

Thank you again for the opportunity to make this submission.

On behalf of Go Eco (Waikato Environment Centre)