

## **SAVE THE RIVERS MID-CANTERBURY INC.**

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### **Submission on the proposals for Freshwater reforms.**

While the intent of much of what is proposed can be supported Save the Rivers Mid-Canterbury Inc. opposes some aspects of these proposals.

In particular we have serious concerns about the nature of the proposed bottom lines.

For Ecosystem Health to set the limit to protect 80% of freshwater species is putting 20% of our most sensitive species at risk. The invertebrate that fall in this category are those that need high quality water to order to survive and these form a most important component of the diet of trout. To put these invertebrate species at risk has the consequence of putting our trout fishery at risk and we find this unacceptable.

These invertebrate also are used in terms of providing a measure of waterway health. We believe that this form of measurement should be identified as a way to monitor the health of our waterways and, as a consequence, there needs to be an assurance that there is protection of these invertebrates.

For Human Health we oppose the setting of the limit with respect to secondary contact recreation (boating and wading). Our waterways should be of a quality that enables swimming and domestic consumption and any bottom line needs to reflect this.

The proposal that the quality of any waterway cannot be further degraded needs to be stronger. Those that are currently at an unacceptable level must be identified and steps need to be taken to bring them back to a higher level than is set by the proposed bottom lines.

While it may not be intended the possibility of the water quality in some of waterways regressing towards these bottom lines exists. Again we believe requirements that prevent this happening need to be stronger.

Save the Rivers Mid-Canterbury Inc. note that decision making is to be by the local community but we believe that 'local community' is not defined. Are we talking about the local council, those who live on, or near, local waterways or all rate-payers? There is a need for total community representation, in particular representation of those with environmental interests (including Fish and Game licence holders), in decision making.

We believe that that the 'exceptions' that are identified in the document could enable economic interests to take precedence over environmental interests. The granting of exceptions needs to be taken at the highest possible level and reflect a fair balance of both economic and environmental interests. Save the Rivers Mid-Canterbury Inc. feel that the inclusion of some of the exceptions has the potential to weaken intended environmental protections.

Save the Rivers Mid-Canterbury believe that time lines need to be such that action is taken as soon as possible. Stated timelines appear to be too extended.

There is a need for good science in the decision making process, any final documentation needs to clearly identify this.

Save the Rivers Mid-Canterbury feel that these reforms should include measures that can restore water to depleted rivers. For example the buying back of consents (noting that the original cost of actual water is nothing) or re-allocation of water should be made with the intention of keeping (or returning) more water in our rivers and streams.

Yours sincerely

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(Secretary, Save the Rivers Mid-Canterbury Inc.)