

Submission on the Ministry for the Environment (2013) Proposed amendments to the National Policy Statement for Freshwater Management 2011: a discussion document.

Submission prepared by:

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Introduction: The Guardians of Lake Hawea

The Guardians of Lake Hawea are a sub-committee of the Hawea Community Association Incorporated and have been in existence for more than 25 years.

The aims and objectives are to see that Lake Hawea, its water and its surrounds are managed wisely for the benefit of all, both now and in the future.

These aims are carried out by:

1. Liaison with whoever uses the water of the lake, in particular the power generation company, Contact Energy Limited.
2. Monitoring to see that the water levels and conditions of the operations laid down by the authorities are adhered to.
3. Collecting and recording any information with regard to the using of the lake and the water and submit this to any review of the lake levels and conditions of operation.

The comments in this submission relate particularly but not exclusively to the catchment of Lake Hawea, the Hawea River, the Hawea Basin aquifer and the surrounding farming and township areas.

Lake Hawea is a large hydro storage lake which now has established operating maximum and minimum levels. The Hawea River also has agreed minimum and maximum flow levels controlled by the generation company; ecosystem health is paramount. The Hawea River is used for fishing, kayaking and swimming.

The lake is surrounded on three sides by high country stations which are increasing their level of farming intensity with subsequent increases in agricultural run-off; fencing of these waterways will not prevent animal faeces entering the water during rain storms.

The lake also feeds the large Hawea Basin aquifer which supplies water for the increasing number of home bores for domestic properties and, in the last three years, for a huge increase in irrigation for dairying – a change from sheep and grain farming.

Of particular concern to this submission are the threats to drinking water where almost all households in the district rely on either bores or the town water supply which is sourced directly from the lake and seldom requires chlorination. Boil water notices from the local council are not acceptable when the cause is found to be E.coli contamination from stock

entering both the lake edges and streams running into the lake. The lake still appears to be in a pristine condition and the community would like to see it stay that way. It is also a concern that there is no management plan for the lake that will ensure its ecosystem and water quality.

It is acknowledged that there is a statutory split with regulations for drinking water standards controlled by the Ministry for Health and therefore considered irrelevant to this submission, but the 2011-12 *Annual Drinking Water in New Zealand survey* asserted that protecting the quality of source water is probably the most important way to manage drinking water supply to meet the standards. (Drinking Water Standards 2000)

Questions as provided in the NPS-FM discussion document

Section 4.2: NOF Values

Q10 A very definite yes.

Q11 Additional values / attributes could be added, eg maintenance of water quality for domestic use and drinking, elimination or control of non-indigenous species, some of which are very invasive and threaten native plants and animals and water quality.

Timing

Q17 Yes, but why delay including as many attributes as possible? For this area there is already a great deal of data available for groundwater / aquifers.

Q18 No, the government should not delay putting the NOF into place, remedial action cannot wait till 2030; today's situation is urgent.

Process

Q23 The Guardians are concerned that allowing for regional discretion in determining timeframes could result in quite different approaches being taken, particularly if local lobby groups were able to prevent change or create unacceptable delays.

Section 4.3 Compulsory national values

Q25 Yes, ecosystem health is vital as it is the starting point for any other values.

Q26 Yes, but human health which relies on safe drinking water should also be included.

Q27 Yes, a third compulsory value should be the provision of high quality water for humans – drinking water, despite this being covered under Ministry of Health Standards. Water for primary contact, ie swimming, should also be specified.

Section 4.4: National bottom lines

The term “bottom lines” gives the impression of a lowering of standards. New Zealand's lowland pastoral and urban rivers are already massively degraded and unfit for swimming. Here in Hawea there has been a rapid change to intensive farming which is likely to increase groundwater nitrate levels – a concern expressed by many. Will the proposed changes to the NOF halt the decline of national freshwaters and prevent decline of our local currently good quality waters? We would be most concerned if exceptions granted became the rule.

Section 4.5: Exceptions

It is possible that burn offs or natural fires might produce a nutrient spike into our lake. As may run off from the increasing stocking rates around the lake after a rain storm event.

Section 4.6: Tangata whenua values

- Q38 The compulsory values leave out water for domestic use – drinking and food production, therefore they do not adequately provide for tangata whenua values.
- Q39 Tangata values as outlined in Appendix 1 are also the values of the wider community, and certainly important for those living at and visiting Lake Hawea.
- Q40 The Guardians support adding Te Mana o te Wai to objective A1 of the amended NPS-FM. It should mean that contact recreation and water for drinking and growing food should become a compulsory value. The process may take longer, however.

Setting the national human health objective below that for safe swimming is unlikely to satisfy iwi, nor indeed the wider community.

Section 4.7 Monitoring

- Q41 Monitoring plans are crucial but they will need to be more robust than indicated, ie with location, frequency, techniques etc specified.

It seems that some recognised indicators of water quality are missing, so if Councils do not have to monitor them an accurate picture of the state of our waterways will not be available or understood.

Section 4.8: Anything else

The whole document and the questions in particular seem to be directed at Councils rather than the general public.

While the power company's consent governs the operating levels of Lake Hawea it has nothing to do with managing the quality of water in the lake or the Hawea River. The suggestion that a Water Conservation Order be applied to the Lake as a management tool that recognises and sustains outstanding amenity and intrinsic values is a good one.

The Guardians are concerned that the standards for ecosystem health and health for secondary contact undermine the fact that our local freshwater is fit for primary contact and for drinking. If a third compulsory value (drinking and swimming) is left out because it is covered under a Health standard this should be stated clearly in this document.

A fundamental bottom line for the Hawea community is that the freshwater bodies in our district, ie Lake Hawea and its aquifer and the Hawea River continue to be fit to swim in and drink from. One of the fundamental expectations of Kiwis is the ability to swim safely in our rivers and lakes. This document largely ignores safe swimming and drinking and this is a major problem for us.

High quality water is the life blood of our people and our environment; aspects of the National Framework threaten us.

Changes the Guardians would like to see made

- Add human health for contact recreation, (swimming) and domestic water (drinking) to the compulsory values.
- Raise the levels of the bottom lines.
- Considerably shorten the time frames by which plans should be in place.
- Include guidelines for groundwater and aquifers.

Decision of the Minister of Environment

- Act quickly to implement our changes.