

**From:** [John Waugh](#)  
**To:** [WaterReformPublicConsultation](#)  
**Subject:** Submission 03096 - John R Waugh - Submission no. 3158 from John R Waugh of Ashburton  
**Date:** Monday, 3 February 2014 4:04:27 p.m.

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Dear Freshwater Reform people in MfE, I attempted to edit a few spelling errors in Submission 3158, but your system does not seem to allow that. There are a few things that I would like added to my original submission. As local examples from Forest and Bird, they may be useful.

At item 32 Exceptions to bottom lines. In mid -Canterbury we have colonies of endemic , threatened species nesting in and along riverbeds. A good example is the large colony of Black billed Gulls which nested in the Ashburton River immediately below SH 1 Bridge in 2013, this year they are slightly further downstream. In 2013 the colony was several thousand birds (maybe 9,000 or 10% of the NZ population), they had a successful breeding season and most likely had an effect or impact on water quality in the Ashburton River downstream of the colony. This is a good example of how national bottom lines may be breached.. The NPS-FM Amendments need to provide a mechanism to cover this situation, once the facts are established it should be mandatory that a Regional Council has to issue an exception (notice). Other examples are on the South Ashburton River, between Buick's Bridge and Blowing Point Bridge where Terns establish colonies, also a few pairs of wrybill and numerous Banded Doterill. Forest and Bird do regular surveys of these colonies (Data held by DoC). In the Ashburton Lakes area there are small populations of Crested Grebe (38 counted in Jan.2014), numerous ducks, and an occasional Bittern. these rare and endangered species, together with numerous Canada Geese, Paradise ducks and Black Swan may affect water quality in the Ashburton Lakes.

At item 42 of my submission, at the end add a 5th Item as follows: Natural Rivers of Very High Quality

Where natural rivers have waters of very high or pristine quality, there should be a provision to allow these waters to be safeguarded in their natural state. In some cases this has been achieved by means of WCO's. Examples of such rivers are the Greenstone, Caples and Routeburn in Fiordland (protected by the Kawarau WCO, gazetted 17-3-1997. Also the Atiwhakatu, Tauherinikau and Ruamahanga Rivers where they emerge from the Tararua Range, further north the Upper Tongariro River where it emerges from the Kaimanawas is of particularly pristine condition. Often these rivers are draining hard rock country, with largely forested catchments, so excellent water quality and high visual clarity are to be expected. However, such a provision in the NPS-FM Amendments could allow much wider application of such a provision to rivers, streams, lakes, and tarns, which clearly contribute to New Zealand's "Clean green image".

Signed John R Waugh, Hydrologist (Retired), 3-2-2014