

TO: Clean Water Consultation 2017
Ministry for the Environment
PO Box 10362
Wellington 6143

BY EMAIL: watercomments@mfe.govt.nz

SUBMITTER: Susan Hall

ADDRESS: [REDACTED]

Email: [REDACTED]

DATE: 25 April 2017

Introduction

I live on the Canterbury Plains at Kirwee and am a keen hill walker. I often visit areas around the Waimakariri, Rakaia and Rangitata rivers, and also am involved in volunteer tree planting in the Selwyn river catchment. The fresh water ecosystems are incredibly precious as they support fish and invertebrates and rare and migratory birds. I love to go swimming and kayaking on the local lakes and feel strongly that we need to improve the water quality for future generations of recreational users.

General statement

I support the basic concepts in the Consultation Document but they don't go far enough.

We need clearer limits and bottom lines. The policy lacks a clear strong policy directive from central government to guide regional councils on water management.

I request urgent action on protection of our freshwater resources.

Does a price need to be put on freshwater? Should the public own the water resource and control the ability to use for personal and/or commercial gain?

1. It is unclear how the overarching goal that 90% of rivers and lakes will be swimmable by 2040, and the interim goal of 80% to be swimmable by 2030, is to be worked into the existing plan processes. The rivers and lakes have not been identified. Are only larger rivers and lakes relevant? The goal is not legally enforceable.

Seek: The goal of 90% of rivers and lakes to be suitable for primary contact recreation should apply to all rivers and lakes. The timeframe of 2040 should be brought forward to 2030 or sooner.

2. The Consultation document swimming proposals only refers to large rivers and lakes. This excludes most of the waterways. It is the smaller water bodies where

most people swim, because the water is warmer and safer. It is a serious oversight that there is no *E.coli* attribute table or bottom line applying to the other 'smaller' waterways.

Seek: Strengthen the *E.coli* attributes. That the new primary contact *E.coli* attribute table apply to all waterbodies. Primary contact recreation targets should be set for all regions.

3. There is no clear course of action to achieve water quality suitable for swimming. Definitions are unclear and inconsistent e.g. swimming, swimmable, suitable for immersion.

Seek: The NPSFM should set a clear and definitive goal that water quality be suitable for primary contact recreation. Delete definition of "suitable for immersion".

4. Plans should have a trigger for action if there is a downward trend in macroinvertebrate community index (MCI). There should be a requirement to reverse any downward trend, and actions developed to improve the MCI score.

Seek: The MCI be incorporated into the National Policy Statement for Freshwater Management (NPSFM) as recommended by the Land and Water Forum.

Seek: Support the recommendations from the Land and Water Forum to assist Regional Councils to limit two key nutrients, Nitrogen and Phosphorous in our rivers and lakes.

5. There are gaps in the full range of attributes that need to be managed e.g. sediment, copper and zinc. Sediment is a large problem contributing to declining water quality.

Seek: Include all impacts from sediment as attributes in National Objectives Framework. Include policy direction on sediment management. Include copper and zinc attributes in the NOF.

6. Monitoring requirements for *E.coli* should be included and there should be better information to inform the public about the suitability for primary contact recreation at each location. Monitoring and information about cyanobacteria and other toxic algae is also required.

Seek: Amendments to make sure there are monitoring requirements for meeting the *E.coli* freshwater objectives long term, and improve methods to inform the public about the suitability of water ways for primary contact recreation.

7. Objectives A2 and B1 refer to providing economic well-being and opportunities. This is inconsistent with setting environmental limits to water management. Human health and healthy ecosystems should be a first priority.

Seek: Delete the proposed amendments to Objective A2 and B1 referring to provision for economic wellbeing.

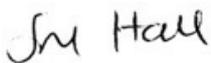
8. Support the exclusion of dairy and beef cattle, and deer from waterways over 1m wide and lakes and wetlands. There needs be a clear and workable scheme to decide what slope class a parcel of land falls within. The timeframes to achieve this should be brought forward.

Seek: The Consultation Document's stock exclusion proposal and any subsequent regulation(s) include a scheme for consistent slope class assessment and requirements to fence stock at an appropriate distance from the waterway.

9. Freshwater objectives need to be set urgently. The timeframes are too drawn out to indicate urgency to the regional authorities or the land users to change habits.

Seek: Amend minimum timeframes for when regional freshwater objectives are to be met by bringing forward the date of implementation of the deadlines by at least five years.

Signed:



Susan Hall