

Your submission to Clean Water

Jill Ellen Hudson

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What are your thoughts on the proposed swimming targets, for example, on the timeframes and categories?

Notes

The target of achieving water quality suitable for swimming is great but the term 'swimmable' is unclear, and there is no sense that many non-swimming recreational activities involve bodily contact with water. Consistent use of the phrase 'primary contact recreation' would provide more certainty. Constricting the 'swimmable' target to large rivers and lakes excludes the majority of water bodies in NZ that will presumably require no monitoring, management or improvement. This makes 90% of a small proportion of water bodies an excessively unambitious target. The timeframe for achieving '90% swimmable water bodies' by 2040 also lacks urgency and should be brought back to 2030.

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What do you think about the proposed amendments to the Freshwater NPS?

Notes

It is good to see MCI monitoring will be required but disappointing that LWF recommendations have been ignored. MCI should be incorporated into NPSFM as per LWF recommendation. LWF recommendations re support for setting DIN and DRP concentrations should also be included in the NPSFM. Amendments relating to economic well-being are short-sighted, unnecessary and should be deleted. Without clean fresh water, any pretence of having long-term human or economic health is nonsense. It is ironic that the 'economic well-being' proposal takes a short-term view of prioritising business/employment factors over a programme to improve water quality that is expected to take over 2 decades to achieve limited results. The amendments do not cover several relevant features of freshwater management including: sediment, urban waterways (including contaminants such as copper and zinc), effects of forestry (especially harvesting) and intensive cropping.

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What are your thoughts on the proposed stock exclusion regulation, for example, the timeframes and stock types to be excluded?

Notes

The proposed stock exclusion regulation is an excellent start but would be improved with more guidance on riparian management.

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Do you have any other comments on the contents of the Clean Water discussion document?

Notes

An obvious tool for freshwater management would be for the government to set a price for freshwater for users (consumers and those discharging nutrients). This should not equate to freshwater 'ownership' but be similar to the DOC concessions process where private businesses pay for use of public conservation land. It is disappointing that this document has modified so many LWF recommendations, particularly as the Land & Water Forum process was based on years of community consultation, negotiation, scientific advice, practical input and collaboration. The recommendations were based on sound science, community input and goodwill, all elements likely to contribute to successful implementation of freshwater improvements. Since the greatest source of freshwater degradation is human activity, getting people on board with the major changes required to improve NZ waterways should focus on the qualities that made LWF such a success. Ignoring or watering down LWF recommendations is a great way to induce cynicism regarding democratic processes and not an effective or efficient means of kicking off a long-term programme of vital importance to NZ's environmental, social and economic future.