

TO: Clean Water Consultation 2017
Ministry for the Environment
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Introduction

I am a retired fisheries scientist with a continuing interest in freshwater. I am a trustee of the Water Rights Trust in Canterbury. I am also an active user of freshwater resources as a New Zealand citizen who drinks water, swims in it and is inspired by it. In addition I am a keen angler and boat user.

General statement

My view is that the suggested changes do not go far enough. There need to be clearer limits and bottom lines. There is still not a sufficiently clear strong policy directive from central government to guide regional councils on water management, and the suggested inclusion of economic considerations drastically muddies the waters.

Key points:

1. Objectives A2 and B1 have additions which refer to providing economic well-being and opportunities. This is completely inconsistent with setting environmental limits to water management and will undermine much of the emphasis in the RMA on environmental protection as it will allow Regional Councils to prioritise development. Human health and healthy ecosystems should remain the first priority, and **it is an imperative that these new phrases be removed.**

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

2. 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, are

to be worked into the existing plan processes. The rivers and lakes have not been identified.

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.

3. The Consultation document swimming proposals only refer to large rivers and lakes. This excludes most 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: Retain the previous *E.coli* levels. That the primary contact *E.coli* attribute table apply to all waterbodies. Primary contact recreation targets should be set for all regions.

4. There is no clear course of action to achieve water quality suitable for swimming. Definitions are unclear and inconsistent eg 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".

5. Plans should have a trigger for action if there is a downward trend in the macroinvertebrate community index (MIC). 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 NNPSFM 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.

6. There are gaps in the full range of attributes that need to be managed eg 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.

7. I strongly support the exclusion of both dairy and beef cattle and deer from waterways over 1m wide, and from lakes and wetlands. However, there needs to 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.

8. 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 2022 deadlines to 2020, 2025 deadlines to 2022 and 2030 deadlines to 2025.