

Your submission to Clean Water

Brenda Johnston, Chairperson, **Lower Hutt Branch Royal New Zealand Forest and Bird**

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

Notes

I oppose the proposed amendments to the Human Health for Recreation attribute table which would weaken the standard for swimmability. The E.coli attributes need to be strengthened. I support the inclusion of smaller rivers and streams (below order 4) in the swimming standards as these are the places that are used by local communities to swim and play.

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

Notes

I support the requirement for regional councils to adopt a Macroinvertebrate Community Index (MCI) score of 80 as a minimum threshold and to develop an action plan to improve the MCI score to above this threshold when monitoring shows there is a downward trend in the MCI, to reverse that trend if a waterway is low or declining as recommended by the Land and Water Forum. I also support all the recommendations made by the Land and Water forum to assist regional councils to limit two key nutrients, nitrogen and phosphorus, in our rivers and lakes. The amendment should specifically include in its objectives and policies the requirement for regional councils to meet water quality standards within specified time frames.

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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 deadlines that have been proposed for excluding dairy support, deer and beef cattle from waterways over one metre wide plus lakes and wetlands are too lenient and need to be brought forward. The 2022 deadlines should be brought forward to 2020. The 2025 declines should be brought forward to 2022. The 2030 deadlines should be brought forward to 2025.

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

Notes

The draft amendments to the NPS propose to introduce a new test requiring environmental and ecological considerations to be weighed against economic ones. In practice this will be used to set freshwater objectives or quantity limits that do not achieve ecosystem health, which is unacceptable. The 'balancing' of environmental and economic considerations has already happened during the consensus process that the Land and Water Forum used to come to its recommendations, and can continue to happen in the way in which time-frames are set. I oppose the inclusion of any new test that requires a balancing of environmental considerations against economic ones.