

Next steps for fresh water: Submission.

Submission by Sir Alan F. Mark, [REDACTED]

April 7, 2017.

As a professional academic ecologist, Dunedin born, now in retirement, and involved for many years with oversight of the management of lakes Manapouri and Te Anau (Chair of the Government-appointed Lake Guardians for the first 26 years), I am deeply concerned with the continued deterioration in the standards of fresh waters throughout much of rural New Zealand, and which the Government has proved unwilling to deal with, effectively, to date.

1. Adequate potable fresh water is one of the most essential natural resources and so must be sustained for the health and welfare of both present and future generations
2. I am deeply concerned that the Government continues to offer very large subsidies to facilitate irrigation and agricultural intensification, the most recent in South Canterbury, despite such land use being clearly associated with serious deterioration in the quality of all fresh water systems in the area.
3. Fresh water quality should be maintained at standards safe for swimming and direct contact throughout the country.
4. Also, minimum flows should be maintained adequate to support the natural aquatic ecosystems and this should be a formal, legal requirement on all regional councils to ensure and oversee.
5. Also, all existing Water Conservation Orders should be honoured, respected and maintained in law.
6. The standards of water quality and quantity in all of our natural water bodies is a very important contributor to the overall environmental quality and reputation of this country, both here and abroad. And it is clearly the responsibility of central government, on behalf of the country's citizens, to ensure that this is achieved. The government is currently clearly failing to fulfil this role.

In Conclusion: I call on central government to serious review and appropriately amend its management oversight of fresh water in this country in order to fulfil its responsibilities to the present and future citizens of this great country.

Subject: Submission on New Zealand's Fresh water.

Recipient: watercomments@submissions.mfe.govt.nz

Sender: [REDACTED]

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SUPPLEMENTARY SUBMISSION TO THE MINISTRY FOR THE ENVIRONMENT ON NEW ZEALAND'S FRESH WATER

This submission supplements that made by me on April 7 last, which I have appended to this submission.

INTRODUCTION.

This supplementary submission has been prompted by the publication, earlier this week, of the comprehensive Joint Report by the Ministry for the Environment and the Department of Statistics, entitled "**OUR FRESH WATER. 2017**", as required under formal legislation.

The contents of this report are of great concern to me, in terms of its revelation of the seriousness of the invaluable fresh water resources over much of inhabited New Zealand, and are nothing short of a serious indictment on the oversight of management of these resources, particularly over the recent decades, when associated with a significant increase in the area of intensive agriculture, most notably dairying.

Clearly the government has failed to heed the scientifically robust information and associated recommendations from most leading freshwater ecological and environmental scientists in this country, and even the reports and recommendations of these in a formal advisory role to Government, such as the Parliamentary Commissioner for the Environment, and the Prime Minister's Chief Science Adviser.

I feel compelled, therefore, as a professional academic ecologist, now retired after a lifetime researching and applying ecological and environmental principles, including fresh water production from the upland snow tussock grasslands of the South Island high country, and also fresh water management (Lakes Manapouri and Te Anau management), to comment on many of the relevant issues with some conviction and authority.

With this brief introduction, I wish to make several recommendations based on my concerns as revealed in the report on "Our Fresh water, 2017"; as follows:

1. I recommend that: the when announced commitment of this Government that the National Policy Statement on fresh water is finalised, it would include specific swimmable water

targets for each region of the country, which could be enforced independently by the Environment Court;

2. I recommend that: the National Policy Statement must require not merely fencing, but also the planting of streamside buffer strips within this fence;

3. I recommend that: The National Policy Statement makes it clear that Councils are obliged to give effect to its provisions by notifying plan changes within a period of three years;

4. I recommend that: Regional Councils should submit maps showing their proposed Fresh Water Management Units to the Secretary for the Environment, for sign-off as being in accordance with MfE guidelines;

5. I recommend that: References to economic well-being should be clarified so that water quality, environmental and human health, are given the highest priority;

6. I recommend that: S. 104 be amended, or some alternative be devised, to ensure that 'limits' really do mean limits.

7. I recommend that: Any exceptions to the 'limits' framework should only be decided by Central Government, using Appendix 3;

8. I recommend that: A decision mechanism should be specified for assessing where the fencing requirement of waterways would apply;

9. I recommend that: The NPS should require all Regional Councils to identify and protect any sites on smaller streams that are, or may historically, have been used for swimming;

10. I recommend that: There should be a clear bottom line standard for E. coli, that applies to all waterways, to protect human health;

11. I recommend that: The target of 80% swimmable waterways by 2030 should be brought forward to 2025, and to assist with this, the Government should increase the funding of its Freshwater Improvement Fund;

12. I recommend that: The Land and Water Forum's recommendation for ecological health be included in the National Policy Statement;

13. I recommend that: The Land and Water Forum be enabled to continue its work on sediments, zinc and copper, and that its recommendations be included in the National Policy Statement when it is finalised.

I trust this submission, in two parts, will be given careful attention and consideration.

Sincerely, Alan Mark.

Alan F. Mark PhD, ΦBK (Duke), Hon DSc (Otago), FRSNZ, KNZM

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