

Your submission to Clean Water

Monk, Hazel

Clause

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

Notes

Human Health for Recreation - Swimming- Categories: I oppose the proposed amendments to the Human Health for Recreation attribute table, which would weaken the standards for swimmability because 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 often used by local communities to swim and play. Ecological Health: 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, or when monitoring shows there is a downwards trend in the MCI, to reverse that trend if a waterway's MCI score is low or declining " as recommended by the Land and Water Forum. I also support the adoption of all the recommendations made by the Land and Water Forum to assist regional councils to limit two key nutrients, nitrogen and phosphorous, in our rivers and lakes. Targets and timeframes: The NPS should specifically include in its objectives and policies the requirement for regional councils to meet water quality targets within specified timeframes. Economic considerations: 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 building process that that Land and Water Forum used to come to its recommendations, and can continue to happen in the way in which timeframes are set. I oppose the inclusion of any new test that requires a balancing of environmental considerations against economic ones.

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

Notes

The Government's revised Freshwater NPS, part of the Clean Water Package, has not adequately addressed ecological health: It sets bottom lines for nutrients that are ineffective. It does not require regional councils to adopt a minimum Macro-invertebrate Index (MCI) for waterways. 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, or when monitoring shows there is a downwards trend in the MCI, to reverse that trend if a waterway's MCI score is low or declining " as recommended by the Land and Water Forum. I also support the adoption of all the recommendations made by the Land and Water Forum to assist regional councils to limit two key nutrients, nitrogen and phosphorous, in our rivers and lakes. The Land and Water Forum has a full package of measures to improve freshwater health, reached by consensus..... Why are these not used? Targets and time-frames: There needs to be the requirement for regional councils to meet water quality targets within specified time-frames. Economic considerations: The draft amendments to the NPS propose to introduce a new test requiring environmental and ecological considerations to be weighed against economic ones. These will be used to set freshwater objectives or quantity limits that do not achieve ecosystem health which is not acceptable. The "balancing" of environmental and economic considerations has already happened during the consensus building process that 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.

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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

I consider the proposed deadlines (for excluding dairy support, deer and beef cattle from waterways over 1 meter wide, lakes and wetlands) are not good enough. The time-frames that have been proposed need to be shortened to be effective and brought forward: The 2022 deadlines should be brought forward to 2020, the 2025 deadlines should be brought forward to 2022, and 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

In the last 10 years, the dairy cow population has grown at nearly three times the rate of the human population and in some regions this growth has occurred exceedingly fast, eg. in Southland there's been a 500 % increase in dairy cows with related steep increases in irrigation and water degradation. The recent OECD report makes much clearer links between irrigation, dairy intensification, and decline in water quality of the waterways in these areas. New data from the Ministry of Environment's report (just released) on the state of our freshwater invertebrates, and freshwater plants shows that 34% of invertebrates, 72% of our freshwater fish and 31% of plants are threatened or at risk of extinction. Their river, lake and/or wetlands habitat is being developed or degraded at a fast pace and our Government must step in without delay with decisive policies and to address the decline in water quality of these habitats. NZ needs legislation to effectively monitor and regulate factors impacting negatively on our waterways for our children, our grandchildren and future generations. Unfortunately our government seems to consider only short term issues, but the long-term impacts of not being vigilant with planning can be irreversible. Let us not be putting band-aids on damaged waterways, but plan ahead and manage the risks now.

