

Your submission to Clean Water

Kerry James Moore

Clause

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

Notes

Your "swimmable" target is nowhere near ambitious enough and your target dates far too distant. I support rigorous standards for our rivers and lakes that ensure they are swimmable, and ecologically healthy. The ability to safely swim in our rivers and lakes is a Kiwi birthright which needs to be preserved for future generations. But our rivers also need to be ecologically healthy so that they can support the native species and ecosystems that need clean water in order to survive and thrive. Our rivers and lakes, particularly in the lowlands, are in crisis. This is why water is the top environmental concern for New Zealanders. I want to see strong leadership from Government on this urgent issue. I want to see the following changes made to the proposed amendments to the National Policy Statement on Freshwater Management: Human Health for Recreation (Swimmability): 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 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. Keeping stock out of our waterways: I would also like to comment on the proposed regulations for stock exclusion. The deadlines that have been proposed for excluding dairy support, deer and beef cattle from waterways over 1 meter wide, lakes and wetlands are unambitious and should be brought forward. I support the following changes: 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.