

Your submission to Clean Water

Jude Murdoch

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

Notes

In summary, I consider the proposed swimming targets are an inadequate response to freshwater deterioration and degradation of precious natural capital. The targets and freshwater reform in general instead amount to unreasonably deferring a proper regulatory response to the problem (putting the timeframe out to 2040), while at the same time 'watering down' the existing standards for water quality. How else could Kiwis be expected to interpret 1) changing the standard for 'Excellent' swimmability from 260 parts of E coli per 100ml 540 parts per 100 ml, and 2), extending the deadline out for meeting this standard to 2040? As outlined in the 'other comments' component of my submission, this fails to address the underlying drivers of the degradation of freshwater: subsidies, perverse incentives and a broken regulatory regime that does not allocate costs to those that create them, reward and foster activities that operate sustainably, or adequately penalise polluters.

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

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In general, I support the objectives of the Freshwater NPS, as well as the objectives of the amendments under consultation. However, central government has not adequately encouraged or empowered regional councils and local government to properly manage their freshwater capital through encouraging and enabling activities that use it sustainably, while discouraging and penalising activities that do not. This disempowers the NPS and makes its objectives meaningless. That proper stock exclusion regulation is only just being consulted on now is a testament to this, as well as the power of Fonterra and the dairy lobby in New Zealand. Lowering water quality standards such that a river that is "Excellent" can be so polluted that 1 person in 20 gets sick from a waterborne disease compounds this. The Freshwater NPS needs to encourage regional councils towards sustainable, cost-reflective, economically efficient administration and oversight of their respective freshwater capital. But to this, central government first needs to: - properly recognise the incredible economic, social and environmental value of this freshwater capital and critical importance of restoring and preserving it; - remove incentives and subsidies for irrigation and dairy intensification, and encourage and assist farmers to transition towards sustainable practices and value from quality rather than quantity; and - strengthen water quality standards and properly direct and equip regional councils to restore, monitor, and effectively regulate their waterways.

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What are your thoughts on the proposed stock exclusion regulation, for example, the timeframes and stock types to be excluded?

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This regulation is long overdue and needs to be phased in as effectively and expeditiously as possible.

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

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As a new MfE report issued today outlines, New Zealand's dairy intensification has been one of the fastest and most impactful in the world: freshwater biodiversity has declined 72% in recent times, while dairy herds have grown by 69% between 1994 and 2015 to 6.5 million. This is unsustainable and has had a corrosive effect on freshwater sources in New Zealand. The Parliamentary Commissioner for the Environment, Chief Science Advisor to the Prime Minister and the OECD (in its report on New Zealand's environmental performance) have all made the same point. Dairy farmers have simply responded to incentives, subsidies, and a poor regulatory framework that does not remotely penalise polluters or reward environmentally sustainable behaviour. Under this regime, over 600 dairy farms have been set up in the drought-prone Mackenzie Basin. Sustaining this highly unsuited economic activity requires large amounts of artificial fertiliser and water just to grow grass. As a consequence, the light, stony soils leak nutrients into aquifers with disastrous consequences, and the soil base itself erodes. This landscape was not made to sustain dairy farms; so why are we bending nature to our will to make it happen? The answer: this is a snapshot of a bigger problem -- distorted incentives and subsidies backed by a totally defective regulatory regime that does not properly allocate costs to those that create them or incentivise the right behaviour. The same can be seen with dairy displacing viticulture and sustainable horticulture in Hawkes Bay, and other places.