

CLEAN WATER CONSULTATION 2017

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Clearly everyone is in favour of improving the quality of our rivers, streams and lakes but also the downstream estuaries and coastal areas affected by the materials from these waterways.

The purity or pollution of our waterways is the result of all the activities occurring in and above the land in the adjacent countryside.

It will need a much wider integrated approach to how we manage and use our land to succeed or to even improve our current situation.

The draft under comment is a welcome start after the years of debate we have endured with little result in many areas such as Hawkes Bay.

Comment on the Draft

1 It is difficult to understand the logic in wishing to increase the acceptable median annual levels of the bacteria E.coli to almost double those recommended by the Ministry of Health. This is dishonest and is pandering to those activities which will increase pollution. Those people who suffered in the recent Campylobacter and E.coli outbreak in Havelock North will not be seduced by this duplicity.

2 There is great emphasis in the draft on placing more rivers into a swimmable category by 2040 which is highly commendable but I am concerned about

A The ability of the water quality testing to enable a daily record to be posted at the rivers and lakes most likely to be used by the public. Currently the irregularity and time taken to process, make any result meaningless especially in lakes such as Tutira and the Tukituki river.

B The classification of the lakes and rivers for swimming, based on an average annual level of E.coli, for a % of the time eg Excellent = the e.coli level is less than 540 /100ml for 95% of the time. The real information that is required in practice is what are the E.coli levels likely to be in the crucial months of the year when people are likely to find the water warm enough to swim in. It would seem from observations of lake Tutira and local rivers that these months would be Dec.Jan. and Feb.when algal.,cyanobacteria and other blooms occur.In terms of swimmability a classification based on this summer data could be more valuable and a better indication of recreational quality .

C Another crucial indicator of water and ecosystem health are the nutrient levels; those of nitrogen and phosphorus in particular. Much remains to be learnt about the life forms and their roles in our rivers and aquifers, The latter in particular remain a fascinating relatively unexplored world of increasing importance in our water supplies. We have focussed a lot on the levels of nitrates which can be toxic to many of our aquatic fauna and involved in the massive increase in

blooms of several types in our rivers. The levels that we must try and maintain at a safe level must surely be kept lower than proposed in Appendix 2 p35 in the Clean water document.

The maximum mg. NITRATE proposed allows for a greater level than 9.8 for 5% of the year !

This is a potentially toxic level and is FAR too high and needs .

We have according to Dr Mike Joy one of New Zealands most experienced fresh water biologists one of the worst statistics in the world for threatened freshwater fish species .The decline in macroinvertebrates is also occurring. With the continued pressure to develop more irrigation schemes with more fertiliser use in the catchments of already degraded waterways the only result can be more pollution. With our past history of monitoring, regulation and voluntary management there is almost no certainty that we will be able to reach any of the lower nutrient and other pollutant levels such as heavy metals,that are necessary to achieve the goals of stopping further biodiversity loss , cleaner swimmable rivers and the increasing level of water borne diseases .

We currently are hoping that 'science' will find the answers , that we currently do not have to overcome the problems that will certainly arise , while we set targets with no guarantee of success.eg. To reduce the nutrient levels in the Ruataniwha soils and waters to acceptable and lower levels within 15 years, while at the same time adding huge amounts of extra fertiliser and livestock that is needed to make the dam an economic proposition.

Fortunately there are an increasing number of people that believe we cannot take expensive and unproven risks with our water,land and environment for unproven economic benefits.

D Re Objective B 1 Water quantity p15

In paragraph one I believe the mention of 'indigenous ' species is not necessary or relevant in most of ths lowland productive areas of New Zealand. Much of our developed land has many and necessary exotic plants which are now vital parts of the landscape eg clovers for N.fixation ,Poplars for erosion control and willows and many others for feeding the honey bee . Please use the term indigenous only where it is absolutely necessary .

Also in the last phrase "while providing for economic well being,including productive economic opportunities' .This is the type of highly contentious objective that has already caused hugely expensive legal debate and should be deleted if we accept that if we are really to make progress we must focus on truly sustainable projects and land management which the environment can sustain. The key to our future in being an attractive country for tourism and food production depends essentially on the quality of our environment.

Many of our leaders and political decision makers have lived through a period where economists and the philosophy of growth has resulted in many of our developing environmental problems being ignored or delayed.

A more holistic approach to our land and water management is now urgent.

The issues of global warming, biodiversity loss and one almost unmentioned and unseen problem ,the huge loss of organic matter ,humus from most soils must be a consideration When it is considered that a 1% increase in humus can increase the water holding capacity by 170,000 litres per ha . That is 17 litres per sq.m. Quite an incitement to review farming practice in dry areas.!

In New Zealand we have many experienced and innovative farmers, foresters and horticulturists whose expertise could be harnessed to look afresh at widening the versatility of land use and reducing the monoculture and one answer suits all by relying less on temporary solutions such as the Ruataniwha dam.

As a final comment one of the most serious problems faced by many people concerned about the environment, is the difficulty in having any legislation intended to safe guard or improve the environment watered down or regulations reduced in effect by stronger development interests.

There is also the huge amounts of government, or business money ,time and expertise to progress these unsustainable or ,polluting developments There is little in comparison for private Individuals who also have problems in having access to information .

An summary of the above phenomenon can be seen in the book Vanishing Nature published bythe Environmental Defence Society by Marie Brown et al p 24

It is very important that the public has the opportunity to comment on issues such as water Quality but also important that these draft documents are kept more user friendly .

Chris Ryan