

Subject: Proposed Statement for Freshwater Management

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SAVE THE RIVERS MID-CANTERBURY INC.

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18th April 2017.

SUBMISSION ON THE PROPOSED STATEMENT FOR FRESHWATER MANAGEMENT

Our opinion is that the bulk of these proposed regulations is nothing more than political posturing and statistical manipulation which is being used to make what amounts to moves that will not prevent the continued deterioration of our waterways look otherwise.

1. The stated standards are confusing in their definition and appear to be worded to disguise the fact that, if they are implemented, most of our waterways will continue to suffer. The standards need more clarity.
2. The definition of 'swimmable' to apply to waterways that are deep enough to swim in is unacceptable. 'Deep enough' is open to interpretation and so this is an inappropriate definition. All waterways should be of sufficient quality for people to enjoy and swim in, for example toddlers should be able to splash around in shallow waters. Measures for 'swimmable' need to consider all possible pollutants, not just E. coli levels.
3. Raising E. coli levels to 540 /100ml is an unacceptable approach to meeting water quality standards. To state that this is acceptable because they are consistent with European standards is ridiculous, it does not reflect the fact that we need our own very high standards and that nobody in their right mind would want our rivers to end up looking like most of those in Europe. Why would overseas visitors want to come to New Zealand to see rivers and lakes degraded to the level of those in their own countries; having high quality water should be a point of difference for New Zealand.
4. To state that a standard applies 90% of the time is saying that we are happy that it is not met 10% of the time. 10% of a year is more than a month. We cannot accept regulations that allow them to be breached for such a high proportion of a year.
5. To state that communities will decide which rivers and lakes are important is an unacceptable approach. All of our waterways are important and to suggest that different communities can decide otherwise is nothing short of madness.
6. We are already seeing examples of what the minister calls 'exceptions'. It reflects the fact that, even in this early stage, the standards are not robust and that there is an 'out' when requirements are not met.
7. The extended time frame allows for stalling and changes in direction. This organisation is sick and tired of repeated cases of politically motivated paper work that is frequently superseded by more of the same before any real action is taken. What we need is real commitment to improve our waterways, this within a timeframe that is short enough for people to see positive effects.
8. Any policy needs to ensure that existing good quality water is not permitted to deteriorate. To allow the quality of existing high quality water to drop to the minimum of these new so called standards should be unacceptable.
9. Any standards need to clearly acknowledge the link between water quantity and quality. Our Ashburton River is a classic example of a waterway where water quantity has been compromised as a result of over-exaction. Standards must require environmental flows in all our waterways.
10. We support moves to exclude stock from our waterways. This needs to happen immediately.

Geoff Ackerley
(Secretary, Save the Rivers Mid-Canterbury Inc.)