

Your submission to Clean Water

Makere Stewart-Harawira

Clause

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

Notes

The proposal to achieve 90% of rivers swimmable by 2040 is abysmally low, as is setting the acceptable standards for ecoli lower than the current standard. Raising the level of ecoli in river systems is tantamount to a breach of fundamental human rights to clean water and a breach of the Treaty of Waitangi with regard to the protection of taonga. It goes without saying that New Zealand's rivers are one of our greatest natural assets in terms of ecosystem health, community health as well as benefits to water sports and tourism. The state of crisis in which our rivers currently exist threatens the survival of fresh water species - as is well documented, it threatens the health of communities - also well documented, and it threatens the viability of water sports including fishing as well as water-based tourism. I ask that the percentage of swimmable rivers be raised to 100% and that the target timeframe be set at 2025 which is both realistic and achievable. This will however require much more stringent enforcement of existing legislation and the prioritizing of environmental health over economic goals, as is currently the case in the RMA.

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

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I am extremely concerned about the proposed amendments to the Freshwater NPS, as follows: 1. the proposed amendments shift the responsibility of freshwater governance to local regional councils who are in many, if not most cases ill-equipped and lacking capacity to tackle such an enormous responsibility. This is irresponsible governance. 2. The State simply cannot shrug off its responsibility for governance of taonga to regional councils. 3. The proposed amendments make it clear to regional councils that economic gain or well being should be given priority over environmental wellbeing. At a time when ecosystems the world over and particularly in Aotearoa New Zealand are in a state of crisis, this defies all rationality. The function of the Freshwater NPS is not to provide for "economic well-being", it is to provide for freshwater wellbeing. Freshwater objectives must be about targets for freshwater health, not for economic gain. The proposed amendments are ill-advised and should be abandoned.

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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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Re dairy cattle on milking platforms, I agree with the Land and Water Forum recommendation of July 2017 timeframe. Re dairy support, both categories, I believe this date should be set at July 2020 which is reasonable and achievable. Re beef cattle and deer, I hold that this date should be set at 2020. and I support a date of 1 July 2017 for pigs. My concerns however are also for runoff from the land, and I believe it to be imperative that this issue be also addressed in legislation governing acceptable numbers of stock per hectare of land, according to stock type.

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

Notes

I have grave concerns for the legal impacts of the proposed changes, both with regard to their interpretation and to their confusing and often contradictory objectives. In particular, I am, as stated above, concerned with the prioritising of economic wellbeing as expressed in the proposed amendment to Objective B1 which will remove the priority currently placed on the protection of life-supporting capacity and associated environmental attributes of fresh water. Instead it will require for the protection of these attributes "while providing for economic well-being, including productive economic opportunities". In order to achieve protection of environmental attributes, protection of economic well-being and productive economic possibilities may well not be possible, at least not in the same timeframe. It has very wide-reaching implications when applied to large-scale industrial and/or agricultural activity including irrigation. In such case, vulnerable regional councils will undoubtedly be led to priorities economic opportunity. Because there is no caveat to place environmental limits on any such economic opposite city producing activities on either Objective 1B, despite the provisions of Objective 2, the language of the proposed amendments leads to an outcome which is unpalatable, indeed I would argue, unwanted by most New Zealanders; namely a drastic reduction of the degree of environmental protection which is currently provided for in the Freshwater NPS. We have an opportunity to get this right in a manner which will turn around our current trajectory of increasing environmental degradation. It is critical that we do so.