

Clean water consultation 2017

Sustainable Wairarapa

c/o Andrew Stewart

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Thank you for the opportunity to comment on the proposed freshwater reforms

- Comments re swimmability
  - Support swimmability standard in NPS rather than secondary contact
  - However we think the proposed swimmability standard is confusing and unclear.
  - We suggest that Appendix two of the Attribute table for swimmability should include all the metrics set out in table 1: The e coli swimming categories (attributes) in detail on the MFE website.
  - For example to meet band A, a site needs to meet all four criteria from table 1 e.g. <5% exceedance of >540 e coli/100ml and median e coli < 130 e coli / 100ml and 95<sup>th</sup>% <= 540 e coli / 100ml and < 20% samples >260 e coli / 100ml
- We support the concept of assessing water quality at the FMU rather than regional level however think the understanding around the meaning of “**Overall**” water quality within an FMU is not defined enough and will lead to confusion. We don’t believe that trading of a decrease in one attribute for an increase in another is desirable.
- We support the concept of maintain or improve water quality however we also think that quite often there can be significant changes in water quality while staying within a band (particularly band C). We suggest that defining maintain or improve as based on the actual measurement of the attribute being assessed rather than merely staying within a band would lead to better water quality outcomes.
- We think the 90% by 2040 definition (while sounding impressive) should more specifically relate to places where the local community wishes to swim, rather than including remote rivers in the assessment of what proportion are swimmable. Consequently our suggestion of changes to objective A3 reflects this (see below)
- Objective A3: While we support the inclusion of swimmability criteria we believe the objective: “The quality of fresh water in large rivers and lakes is improved so the risk to human health is reduced and they are suitable for immersion more often” could be improved. Change to: The quality of fresh water in large rivers and lakes is improved so the

risk to human health during immersion is reduced and they are suitable for immersion where the local community wishes.

- We would like the government to act on the recommendations put forward by LAWF as an integrated approach rather than picking bits of the recommendations to implement.
- We support the concept of Te Mana o te Wai and its incorporation into objective AAA1
- We don't believe that there is a need to wait until 2022 to exclude beef cattle that are being break fed. Given the small cost of electric fencing we believe that can be implemented straight away, especially on land < 15 degrees. Similarly dairy support stock should be excluded from waters ways on land < 15 degrees by 2020 rather than 2022, given the cost of electric fencing.
- We would like to see equal emphasis on improving urban and rural water quality through involving local communities and suggest that some of the money allocated for the Freshwater improvement fund addresses this. We would like to see some opportunity for funding projects <\$200k as many small projects can increase local involvement as well as improving water quality.
- We support the addition of MCI into the NPS.

Thank you

Andrew Stewart