

**Subject:** FW: MfE Consultation 2017 - Swimmable Rivers

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**To:** Water Consultation Questions and Comments

**Subject:** MfE Consultation 2017 - Swimmable Rivers

Submission on the Water 2017 Consultation

Tom Taylor

To the Environment Minister,

Two recent reports, the OECD 2017 Environmental Performance Review and the "Our freshwater 2017" report released today, underscore the need for action to clean up our rivers and streams. I have a number of issues with the proposed amendments as in my view they are clearly not sufficient to deliver the water quality really required for safe contact recreational use, particularly swimming.

#### 1) Stock exclusion

Under the proposals stock will only be excluded from ca. 10% of watercourses while being allowed access to the other 90% hence leading to a 'reservoir' of polluted water which will contaminate the downstream 'safe' watercourses, particularly when flushed out by rain.

The problem with contaminated water being washed downstream could be mitigated, perhaps, by an app for i-phones etc. that warns people about slugs of water with high pathogen levels so they don't go swimming: a sort of 'foul water forecast' based on the rainfall pattern and speed of flow in a catchment.

However, that's just mitigating a symptom - excluding stock from watercourses is one of the actions needed as it is the most effective and desirable option despite the increased cost.

#### 2) Further action to stop pollution

Intensive agriculture, particularly dairying, is a major factor having an adverse effect on our watercourses. Hence we should have a moratorium on new dairy farm conversions and end subsidies for irrigation (currently about \$0.5 billion of taxpayers' money is earmarked for irrigation). That money should be put into cleaning up rivers not polluting them.

Most of our sewerage and storm sewer systems would be familiar to Joseph Bazalgette. We should adopt the principles of Low Impact Design to cut the impact of our foul and stormwater systems on watercourses which would put that \$0.5billion to better use.

#### 3) Keeping New Zealanders informed

The current website doesn't work well. It's unreliable, confusing and doesn't include toxic algae (a real problem in Environment Minister Nick Smith's own constituency!). However, leaving out toxic algae means that rivers that would otherwise be unsafe can be graded as safe (hence Nelson/Tasman is 96% swimmable under the new definition). A neat bit of sleight of hand.

#### 4) Freshwater improvement fund

It appears from the Q&A on the Ministry's website that the fund covers 50% of a project's total cost and any organisation involved will have to cover the other 50% with a minimum of \$200,000. This severely limits the possible project partners to those which are large and well-heeled and excludes many locally-based organisations.

#### 5) Additional costs to councils

The additional costs to ratepayers will apparently run to several hundred million dollars but will depend on the area. Northland will be particularly hard hit as only 29% of watercourses are graded excellent, good or fair. The proposals leave it up to councils to decide what they do and the section dealing with it is woolly (p.9) though councils must consider "economic wellbeing". This is a national issue and the government should take responsibility and properly play it's bigger part, particularly by laying down standards that have to be complied with rather than unloading responsibility on to councils so that they get the flak, and also by providing funding where needed.

I don't want to have my name published on the MFE website, or released via OIA - no

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