

Submission by Ngati Kea Ngati Tuara on **Clean Water 2017 Consultation**

To Clean Water Consultation 2017  
Ministry for the Environment  
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Te Runanga o Ngati Kea Ngati Tuara Trust wish to be heard in support of this submission at any hearing.

If other parties make similar submissions, Te Runanga o Ngati Kea Ngati Tuara Trust may be prepared to present a joint case at any hearing.

## Submission

1. This submission is made by Te Runanga o Ngati Kea Ngati Tuara Trust in relation to the Clean Waters 2017 Consultation. This submission is made on behalf of Ngati Kea Ngati Tuara, a hapu of Te Arawa iwi.
2. Ngati Kea Ngati Tuara are co-governors of the Waikato River, as reflected in legislation relating to the co-management of the Waikato and Waipa Rivers.
3. We support the inclusion of Te Mana o Te Wai.
4. Swimmable areas should not be limited to fourth order rivers.
5. We support the amendment to relate the maintenance or improvement of water quality to freshwater management units (FMUs) rather than regions, however The NPSFM provide guidance on appropriate minimum scale/scale-setting process for FMUs.
6. The current water quality standards are inadequate, the standards should be more closely aligned with the well-researched guidelines, such as ANZEEC guidelines (2000), which relate human health, animal health, ecosystem health in terms of impacts of contaminants on ecosystem processes and aquatic species.
7. The range for some of the 'Annual Median' Numeric Attribute States seems high, the difference between the upper and lower band boundaries can mean significant change in water quality, ecosystem health or human health.
8. We support the use of macro vertebrate MCI as an attribute and measure of ecosystem health, however as stated earlier the standards set should reflect and align with proper guidelines.
9. Zinc, copper and sediment are not included as important attributes that need to be managed, these need to be included and the recommendations from the Land and Water Forum on these should be included when the National Policy Statement is finalised.
10. Inadequate focus on urban water issues has been evident at all stages of the freshwater reform process. This needs to change.
11. The Land and Water forum made recommendations on ecological health of waterways these should be included in the National Policy Statement.

12. In regards to Hydro-electric power generation, extra measures need to be put in place to protect the native fish that need 'safe' passage through these dams. Many dams are not required to provide a 'passage' for these fish and those that do are not providing 'safe' passages.
13. We generally support the exclusion of stock from water bodies, and the deadlines but believe all waterways should be excluded and that riparian management should be included in the regulation to prevent overland or subsurface flow of nutrients.
14. We do not support the application of the stock exclusion regulation only to drains and streams that are wider than one meter and deeper than 30 centimetres. Small streams and/or intermittently flowing streams provide critical habitat for a range of native fish, include many threatened species.
15. There is no workable scheme for deciding what slope class a parcel of land falls within, this needs to be worked on.
16. We question why sheep are not included in this stock exclusion regulation, they should definitely be included.