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Clean Water 2017
Ministry for the Environment
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Clean Water 2017 consultation

The New Zealand Association of Impact Assessment (NZAIA) makes the following submission on the Clean Water 2017 consultation (hereafter the consultation).

About the New Zealand Association for Impact Assessment (NZAIA)

The NZAIA is a community of impact assessment specialists and supporters. Our membership comprises 80–100 practitioners of many kinds; academics, researchers and students, and other assorted professionals and interested parties. Our members include many of the leading IA experts in NZ, with longstanding reputations and a wealth of New Zealand, Pacific and international experience. We all share a deep interest in impact assessment, a decision-support method that is one of the most important tools we have for safeguarding the environment.

We are the New Zealand affiliate of the International Association for Impact Assessment (IAIA), a professional association with some 1700 members located across 120 countries. NZAIA is also partnered with the Environment Institute of Australia and New Zealand Inc. (EIANZ); and the Secretariat of the Pacific Regional Environment Programme (SPREP).

Comments on the consultation

NZAIA members agree that degradation of the freshwater environment is a pivotal national issue. The 2017 OECD Environmental Performance review for New Zealand states that New Zealand's growth model is approaching its environmental limits with water allocation limits surpassed in some regions, including extremely high levels of threatened native freshwater species. The OECD report highlights conflicting government policies supporting increased irrigation and intensification of farming while maintaining water quality goals. These conflicts require systematic consideration of the environmental and community costs and benefits of all water uses, assisted by tools such as impact assessment.

NZAIA supports clear national policy direction for freshwater management. While it is important for regional councils to have some flexibility in the way they approach the setting of limits through policies and plans, there is also an obvious need for greater consistency of this process between regions, with clear national guidance.

In order for regional councils to give effect to maintaining or improving the quality of freshwater, the members of NZAIA consider that the process of impact assessment is an essential tool. Members emphasise that the process of impact assessment includes both the assessment of proposed policies and plans and the monitoring of impacts or outcomes for all members of an affected population and their communities. In our view, there is insufficient assessment of proposed policies and plans in the Clean Water 2017 Package (as well as impacts). Moreover, the *Our freshwater 2017* environmental report from Ministry for the Environment and Statistics New Zealand highlights indeterminate trends for *E.coli* for the period 2004–13, as a result of insufficient data to determine a trend at many monitored sites. Much more resourcing is needed for monitoring and impact assessment.

The NZAIA agrees that it is important to specify desired attributes or standards to use as part of the process of setting objectives for freshwater management in a council area. Clearly stated attributes provide an objective basis for assessing proposals for change, including resource consents. Swimability is generally defined by a large number of factors, some in combination with others. We agree with removing the reference to secondary contact recreation as it is confusing. The national guidelines for attributes of swimability should focus on suitability for primary contact recreation. The focus for councils should be on attributes that are consistent across regions but also reflect the regional environmental baseline and values around freshwater. In addition, the proposals for ensuring safety for primary contact recreation need to apply to a greater range of water bodies, not just “large rivers and lakes”. NZAIA considers that there needs to be an *E.coli* attribute table and bottom line applying to ‘smaller’ water bodies – in recognition of the connection between these smaller waterways and larger ones and the local significance of many smaller water bodies.

In respect to other attributes:

- The index for inorganic substances should include guidance on levels of sediment and trace elements that require action as these can have major environmental effects on water quality and use in many water bodies.
- Also, for macroinvertebrate communities, the macroinvertebrate community index (MCI) should include trigger points for action by councils for different types of water body.
- Likewise, trigger points are needed for levels and types of periphyton and also for microbial attributes, with greater clarity around potential outcomes for human health, ecosystem health and recreational activities.
- We agree that it is important to include and specify attributes (such as salinity and presence of macrophytes) for lakes and lagoons that open intermittently to the sea, including those that have managed openings.

We support the principle of Te Mana o e Wai for freshwater management. The NZAIA support the principle that when Te Mana o Te Wai is given effect, a water body will sustain the full range of environmental, social, economic and cultural values that the iwi/hapu and community hold.

A comprehensive approach to monitoring is required for effective environmental management. NZAIA fully supports the initiatives being taken, including on-line tools, that enable national agencies, council staff, advisors and the wider community to have a full appreciation of the state of our water bodies nationally and regionally. Environmental monitoring is an essential part of freshwater management. There needs to be clear direction to councils that their monitoring is in sufficient detail across physical, ecological, social, cultural and economic attributes to provide the baseline that each council can work from in assessing effects. Monitoring for consents, compliance and environmental factors needs to be integrated better. When the baseline information is weak the process of assessment is weak.

While it is important for decision makers to consider economic opportunities from use of water when making decisions about water quantity and quality, it is always important to weigh up the potential economic benefits of any policy or plan alongside social, cultural and ecological effects. It is clear from *Our freshwater 2017* that current negative trends reflect past practices. Many current policy settings reflect short-term economic costs and benefits, with ill-considered issuing of consents to abstract water or discharge to water, and not the long-term ecosystem or social consequences. A thorough, balanced assessment of effects is needed in water management, including the potential to exceed environmental limits.

Prof Richard Morgan

Chair

NZ Association for Impact Assessment

Submission prepared by members of the NZAIA Core Group