

Your submission to Clean Water

Muriwai Valley Farm Enterprises Ltd (Beverley Trowbridge)

Clause

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

Notes

It is to be applauded that the new targets now make it clear that Councils need to work to Swimmable levels and not just to wadeable ones. It is also admirable that these targets levels are in line with other international targets for freshwater quality, although the veracity of that claim has not actually been demonstrated in the discussion document, and it would be necessary to demonstrate that case unequivocally. It is regrettable though that the opportunity has not been taken here to strengthen our commitment to water quality in a more inclusive sense, by providing targets for turbidity, chemical inputs and macro-invertebrates as well as just E.coli & toxic algae, which are just contaminants in the freshwater system rather than indicative of the health of the freshwater ecosystem per se. By just focusing on these contaminants the proposals do not really address water quality but are merely making our freshwater safe for humans to ingest accidentally. This is not tackling our inherent water quality issues in modern day NZ. Whilst a lot of time, money & effort will be spent over the next 10-20 years to achieve these targets, our freshwater, estuarine & coastal environments are likely to continue to decline significantly. This is a missed opportunity.

Clause

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

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There needs to be compulsory targets for monitoring, with numbers of sites to be monitored from each land category, as well as frequency of monitoring. Maintaining water quality when it is at a poor or intermittent or fair levels is not acceptable, the policy statement should always require an objective to improve water quality unless an exemption has been given. There needs to be a specific policy statement concerning sedimentation of waterways and obligation on councils to monitor and improve this situation, especially during high rainfall events. Soil erosion & siltation of our waterways is one of this country's major environmental issues and to not mention it is highly misleading. Soil loss has a major impact on our economy as well as major impacts on our freshwater & marine environmental values. This is an area where major research & monitoring is required alongside development of mitigation & remedial practices. It would be logical to include a requirement for councils to begin working on developing whole farm environment plans to be rolled out across each region in tandem with these new targets for swimmability, to start tackling all the freshwater issues together, not on a piecemeal basis, that way the tax payer will get best value for money spent over the next 10 to 30years, and the farmers will get better long-term solutions too. There also needs to be a roll-out of national measures and targets for the identification and protection of best remaining quality of freshwater habitats across the country, so that we can retain the little that is left in good condition, and provide incentives and help working with landowners to protect & manage these to retain their intrinsic values. We have no systems in place to retain & restore freshwater habitats, which are some of our most threatened habitats, and this is a national disgrace- (for more on this see below).

Clause

What are your thoughts on the proposed stock exclusion regulation, for example, the timeframes and stock types to be excluded?

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This is a great start to see some stock exclusion measures being brought in. However, the targets are not looking at the issue as a whole, or addressing it in the most effective places as a priority. Sedimentation is a major issue which begins in the hill country and moves down the system to the lowlands, so it needs to be stopped at source, therefore to have no exclusion targets at all in place for hill country makes no sense when looking at water quality as a whole. E.Coli are transported into freshwater via soil particles and therefore stock exclusion needs to start in the hill country. Stock exclusion is now a beef & sheep farm issue, having shifted in emphasis from lowland dairy farms. Most soil loss occurs in steep hill country caused by farming & forestry practices there, so targets must be brought in to exclude stock from streams & waterways there as a matter of urgency, as well measures needed to control soil loss from forestry operations. Stock exclusion without mandatory riparian buffers is a waste of taxpayers money & everyone's time and effort, as soil & nutrient loss will continue unabated without adequate buffers and/or significant changes in farming practices. In the current targets there is potential for considerable ambiguity and avoidance of action over the use of the term "break-feeding stock". In beef growing systems there is a current trend for very high stocking levels in intensive beef "cells", which causes very significant dunging, soil erosion, and trampling over a very small area. The electric fence systems used are not necessarily moved, they can be fixed, and therefore the definition of "break-feeding" needs careful clarification to include any form of intensive stocking. Break-feeding needs to include these more static high stocking systems as they occur crucially in hill country & on rolling land which are our most unstable and vulnerable land gradients for erosion & run-off. Since there are no protection designations in place for the majority of our farm wetlands & waterways the introduction of these new exclusion timelines could see a flurry of activity to drain and infill a lot of farm freshwater habitats, further exacerbating their already high vulnerability and scarcity. This kind of pre-emptive activity very often occurs in advance of mandatory time deadlines for environmental protection measures that are going to cost money and perceived inconvenience, and so can be counter-productive to the whole initiative. What measures are proposed to prevent this occurring?