

Clean Water Consultation 2017

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Waihora Ellesmere Trust is neither for nor against the proposed Clean Water package 2017. However, we do have some comments on specific aspects of the proposed changes.

Swimming targets

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

In general, we are concerned at the lack of clarity in the proposals and the communication of the rationale for changing the way that swimmability is to be assessed, evidenced by the media debate and the confusion surrounding the announcement of proposed changes.

From the consultation document:

90% of rivers and lakes swimmable by 2040 (p.11)

"Safe to swim' is based on water quality information alone. It excludes other factors that can affect safety, such as access, flow rates, adverse weather, or cyanobacteria in rivers for which there is insufficient data for modelling to map reliably."

Clearly, there will be many instances when there is insufficient flow or other factors such as the risk of toxic cyanobacteria which will make rivers unsafe, so the description 'safe to swim' may be highly misleading at times. Please note the condition of the Selwyn/Waikirikiri over the summer of 2016/17, with low flows and the presence of potentially toxic cyanobacteria, yet at times having low *E.coli* counts.

Please consider an alternative to the term 'safe to swim' - perhaps 'generally safe to swim'.

Mapping of rivers and lakes

We are concerned about the lack of accuracy in the maps published by the Ministry and ask that greater care be taken to ground truth these maps.

<http://www.mfe.govt.nz/fresh-water/about-freshwater/canterbury>

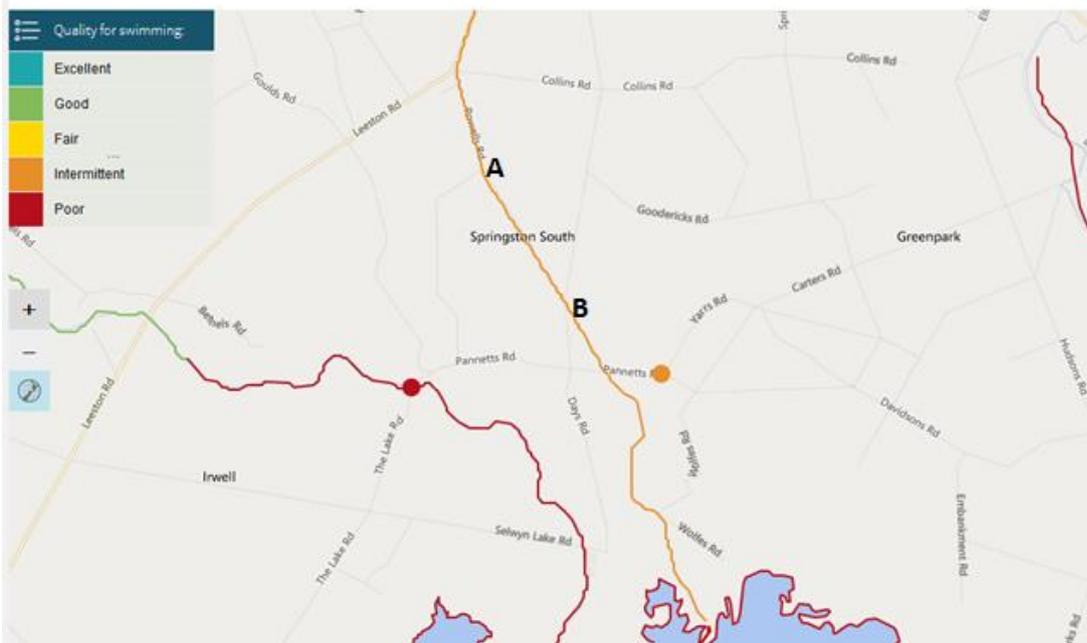
Specifically, the orange (i.e. intermittently swimmable) 'river' shown below as a tributary of Te Waihora/Lake Ellesmere is in fact a roadside drain (or possibly a water race in places north of SH1) for the section shown upstream of Pannetts Rd, and could not possibly be considered suitable for swimming in any circumstances, regardless of water quality. Please see photos below.

Including a non-existent river on the map undermines the credibility of all other information presented.

Rivers and lakes in Canterbury Region



Rivers and lakes in Canterbury Region



Location A – Powells Rd nr Curries Rd (currently dry) Location B – Powells Rd nr Days Rd both looking north

Proposed amendments to the National Policy Statement for Freshwater Management

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

3.2 Monitoring macroinvertebrates (p.18)

We welcome the requirement for monitoring macroinvertebrates and also the requirement to develop action plans to respond to the results of monitoring.

3.4 Managing nitrogen and phosphorus (p.19)

We welcome the requirement for all regional councils to establish in-stream objectives for concentrations of dissolved inorganic nitrogen and dissolved reactive phosphorus.

3.5 Economic wellbeing (p.20)

“.....regional councils must consider the community’s economic well-being when making decisions about water quantity, deciding what level or pace of water quality improvements will be targeted, and when establishing freshwater objectives.”

We are concerned that the proposal to explicitly require economic considerations to be taken into account when making decisions about water management is sending a signal that those economic considerations should be placed above achieving environmental outcomes.

As noted in the recent *OECD Environmental Performance Reviews: New Zealand 2017* the government has articulated a target of doubling the exports from the primary sector to boost economic returns. This should not be achieved at the expense of water quality and quantity. As the report states (p.156):

“It is unclear how the twin objectives of reducing environmental impacts and doubling primary exports in real terms will be achieved.”

We consider that economic factors are already well canvassed in the *National Policy Statement on Freshwater Management 2014*. Policy CA2 f) (e) in particular covers this point. Several additional values relating to economic wellbeing are also identified.

Specifically:

NPS FM 2014

Preamble

To respond effectively to these challenges and issues we need to have a good understanding of our freshwater resources, the threats to them and provide a management framework that enables water to contribute both to New Zealand’s economic growth and environmental integrity and provides for the values that are important to New Zealanders.

Policy CA2

By every regional council applying the following processes in developing freshwater objectives for all freshwater management units:

f) considering the following matters at all relevant points in the process described in Policy CA2(a)-(e):

v. any implications for resource users, people and communities arising from the freshwater objectives and associated limits including implications for actions, investments, ongoing management changes and any social, cultural or economic implications;

ADDITIONAL NATIONAL VALUES

Irrigation and food production

Commercial and industrial use

Hydro-electric power generation

Transport and tauranga waka

3.7 Coastal lakes and lagoons (p.21)

We welcome the inclusion of ICOLLS in the NPS framework and note that appendix 4 enables transitional freshwater objectives below national bottom lines for a set timeframe and this mechanism can apply if a regional council decides it is not feasible to meet national bottom lines in the short to medium term.

Excluding stock from waterways

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

We welcome the new requirements to exclude stock from waterways:

5. Keeping stock out of our waterways

“These requirements would apply to the bed and banks of lakes and natural wetlands, and permanently flowing waterways on plains (including rivers, streams and drains).”

We are particularly pleased to note that drains are specifically included. The drainage network around Te Waihora contributes a significant proportion of the inflows to the lake and addressing water quality issues in all waterways – whether natural, modified or constructed - is critical to improving the health of the lake. This has been addressed in Plan Change 1 of the Canterbury Land and Water Regional Plan and a consistent approach at a national level is a positive move.

Other

Do you have any other comments on the contents of the Clean Water discussion document?

We welcome the move to requiring greater consistency in freshwater management, monitoring and reporting across regions

We welcome greater recognition of tangata whenua values and more involvement of iwi.

Resourcing – the public require better monitoring and reporting in order to be assured of the safety of water for swimming. We expect that the government will provide additional resourcing to regional councils for this work to be carried out.

If you are emailing your submission, send it to watercomments@submissions.mfe.govt.nz as a:

- PDF
- Microsoft Word document

Submissions close at 5.00pm on Friday 28 April 2017.