

Your submission to Clean Water

Joy Mavis Talbot

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

Notes

The E.coli attributes should be strengthened rather than weakening them as proposed. Yellow should not be considered swimmable unless it is sites monitored very regularly – how does someone out with their friends or family define – ‘normal conditions’? Safe except following heavy rain events is easy for everyone to understand. I take exception to including as swimmable montane to high alpine waters (the majority in national parks, or in country where few people go) in the swimmable percentages as only rarely will anyone swim in these blue category waters. Including the majority of these waterways is a cop-out and appears to be designed only to show how good our waterways are on average rather than indicate a true percentage of waterways that are swimmable. Most of the waterways and lakes, or portions of lakes, that New Zealanders swim in, or previously swam in, are in the yellow and orange categories and it is these waterways, along with the green category waterways, that should have to reach 80% by 2030 and 90% swimmable targets by 2040. I support the inclusion of smaller rivers and streams (below order 4) in the swimming standards, as these are the places that are often used by local communities to swim and play.

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

Notes

Ecological Health: As a person who has published in the area of limnology (lake ecology) I support the requirement for regional councils to adopt a Macroinvertebrate Community Index (MCI) score of 80 as a minimum threshold, and to develop an action plan to improve the MCI score to above this threshold, or when monitoring shows there is a downwards trend in the MCI, to reverse that trend if a waterway's MCI score is low or declining – as recommended by the Land and Water Forum. I also support the adoption of all the recommendations made by the Land and Water Forum to assist regional councils to limit two key nutrients, nitrogen and phosphorous, in our rivers and lakes. Targets and timeframes: The NPS should specifically include in its objectives and policies the requirement for regional councils to meet water quality targets, at a minimum, within specified timeframes. Economic considerations: The draft amendments to the NPS propose to introduce a new test requiring environmental and ecological considerations to be weighed against economic ones. This sort of test has been the mainstay of the so-called – ‘environmental’ economics, with its emphasis on how humans can get the most out of the environment (as compared with ecological economics which emphasises the preservation of natural capital) and always ends up giving little value to ecological values even though it is obvious now that we as humans cannot survive unless we start seeing ourselves and our economy as a subsystem of the earth’s larger ecosystem. In practice environmental economics will be used to set freshwater objectives or quantity limits that do not achieve ecosystem health, which is unacceptable. The – ‘balancing’ of environmental and economic considerations has already happened during the consensus building process that that Land and Water Forum used to come to its recommendations, and can continue to happen in the way in which timeframes are set. I oppose the inclusion of any new test, especially ones that allow regional councils to re-balance environmental considerations against economic ones.

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

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The deadline for excluding pigs and dairy cows from all waterways including drains over 1 m wide is great. Only 2 months away! However, the deadlines that have been proposed for excluding dairy support, deer and beef cattle from waterways over 1 metre wide, lakes and wetlands are too far out and should be brought forward. I support the following changes: The 2022 deadlines should be brought forward to 2020; the 2025 deadlines should be brought forward to 2022; and the 2030 deadlines should be brought forward to 2025. The majority of these animals are on rolling land to steeper country where the majority of the wetlands, streams and lakes which feed the lowland waterways begin. If the water on the flatter land is already polluted by high E. coli, sediment and N and P nutrients coming from higher up the catchment then recovery of swimmable waterways can only be delayed.

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

Notes

I support rigorous standards for our rivers and lakes that ensure they are swimmable, especially by children, and ecologically healthy. What I considered my birthright as a New Zealander needs to be preserved for future generations. The best way to have swimmable waterways is to preserve or encourage their ecological health such that they support the native species and ecosystems that need clean water in order to survive and thrive. Our rivers and lakes, particularly in the lowlands and near urban areas where most people would take their families to swim, are in poor condition. My son and I regularly go stand-up paddle-boarding on the Opawaho / Heathcote River in Christchurch as it is walking distance away from home. Although the water is clear, the bottom is silt covered, there are very few fish, plenty of exotic weeds and we really, really try hard not to fall in because of the high bacteria load in the river. I am part of a group recently formed to try and bring life back to this urban river again. Together government, local bodies and communities may bring our fresh water systems back to the state I remember as a child over 50 years ago.

