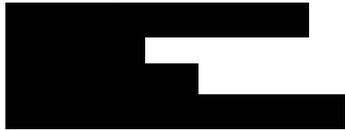


Your submission to Clean Water

Graeme John SAWYER



Clause

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

Notes

Increases in the "acceptable" limits of bacteria that define what is "swimmable" are a nonsense and should be abandoned forthwith. They have made the Ministry a laughing stock nationally, and globally. In other words, HIGHER standards for suitability (not lower ones, as proposed by MFE here) are appropriate. "Swimmability" should be a target for 95% of waterways within 10 years, and ALL waterways (100%) within 25 years: It is the refusal of successive governments over the last decades to seriously address these issues that has seen our waterways degrade with increasing rapidity, and even if it means a reversal of farming intensification and a modest reduction in National GDP, this should be done. We see from other similar countries that high-value agricultural production need not result in such wholesale destruction of our environment as is occurring in NZ now - there are other (more sustainable) models out there, and MFE and its NPSs should be setting aggressive and consistent "boundaries" for water quality standards that create the "market certainty" necessary for those alternative agricultural models to be invested in with confidence. Most importantly, our tourism earnings and our national reputation (two things linked very closely together) are now being jeopardised by the failure of policies - such as this one - to sufficiently tackle the problem of our degrading water quality. Something is better than nothing, but these targets are insufficient, and too poorly "backed up" by action, to make a significantly large improvement to our fast-degrading waterways. In short, "far to little, and too late".

Clause

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

Notes

The last minute changes to the NPS which see economic factors elevated to equal footing with environmental concerns, are an abomination and must be removed immediately. The discussion document states that "we propose amending the Freshwater NPS to make clear that 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". To me, and to most right-minded kiwis, it is clear that the addition of reference in the NPS to economic considerations to the high level (as has been done in this NPS), will inevitably result in Regional Councils and Unitary Authorities putting economic interests above those of environmental sustainability. So doing is wrong. This subverts the very purpose of the RMA, which is to ensure sustainability of resources remains Paramount. For this reason, the addition of "pro-economics" caveats at such a high level in the NPS is wrong, and must be reversed. These changes will, I believe, undermine and subvert the core purpose of the RMA, to protect our environment from unsustainable development. I believe that long-standing core purpose of the RMA "to hold the importance of our environment ABOVE that of economic interests, so that our long-term sustainability is preserved - is appropriate and correct. In the interests of my children and their children, I ask that it be respected and preserved.

Clause

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

Notes

A waterway 1m wide is a good sized stream, and for this NPS to be disinterested in any stock roaming through a narrow but swift stream of half that width, is unwise and inappropriate! scores of badly contaminated Streams smaller than 1m wide may inevitably flow into larger streams - which could well be thoroughly contaminated by the time they reach that size! The "message" on the significance (to water quality) of excluding stock from waterways has been well understood by all farmers for 20 years. Further delay in mandating exclusion of ALL farm stock from ALL waterways greater than 20cm wide simply cannot be justified - the fiscal cost of excluding stock (fences, riparian plantings etc) must simply be accepted as a necessary cost of farming, one that must be given a much higher priority for enforcement by NZ authorities (MPI and the Police). It is inevitable that our degrading water quality becomes the justification for trade barriers to our key markets, and when that happens, they may well be far more expensive to fix (and it may possibly be too late to do so by then anyway).

Clause

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

Notes

I feel that the document failed to highlight the possible -even likely - impact of the NPS wording changes that may well subvert the very purpose of the RMA by elevating economic development issues to the point where they are likely to "trump" environmental sustainability issues when Regional councils make important consenting decisions on water issues. In so doing, the discussion document thus failed to inform laypeople so they might understand the full (and negative) impact of these NPS changes may very well have on decisions that affect their local waterways. I believe that this omission was shameful. Similarly, the unavailability of printed copies was appalling. Most of us can deal with electronic data comfortably these days, but not all - it is fundamentally unfair to thus exclude that minority from participating in this consultation.