



Environment Network Manawatu
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Dear Ministry for the Environment,

Below is the Environment Network Manawatu submission on Next Steps for Fresh Water
We would like to speak to our submission

About ENM

Environment Network Manawatu (ENM) is a charitable umbrella organisation dedicated to enhancing the Manawatu environment. We currently have 46 active group members¹, based in Palmerston North and the wider Manawatu area. This submission has been written and revised to incorporate feedback provided by our member groups.

Our submission

Fresh water flows through all of us – the human body comprises 60 – 70% of which around 3% are replenished on a daily basis. Freshwater keeps the economy 'afloat' it is a vital ingredient not only to agriculture, but also to tourism, energy generation, mining and everything else. Even manufacturing and service industries rely on the availability of water to stay in business. There is no substitute for freshwater.

It is, therefore, absolutely vital to ensure the availability of unpolluted fresh water in the long term.

ENM supports the compulsory values stated in the National Objectives Framework:

- The health and life-supporting capacity (mauri) of water (Ecosystem health/Te hauora o te wai; and
- The health and wellbeing (mauri) of the people (Human health/te hauora o te tangata).

Freshwater and our environment

Given these very clearly stated compulsory values, ENM supports the maintenance and improvement of water quality within freshwater management units. The focus on freshwater management units (e.g. catchments or sub-catchments) will focus the minds and efforts on one unit rather than creating uncertainty of how to assess and trade-off 'overs' and 'unders' between units.

The compulsory values at the same time reinforce the need to set a more ambitious bottom line than 'suitable for boating and wading' to trigger improvements for water units.

- 1 In the first instance water bodies should be able to support the indigenous life forms within and around the water bodies. The availability of mahinga kai (traditional food sources) could provide a better indicator of the life supporting capacity of water than 'wade-able' will.
- 2 As far as human health is concerned, we recommend that suitable for swimming, with exemptions for rivers that would exceed limits because of non-anthropogenic factors, should be considered to become the bottom line to maintain.

1 Our member group Landcare Trust has a formal, blanket "no submissions" policy and is not represented by this submission.

ENM supports the government in including the MCI as one of the water quality measurements. Given our comments around the life supporting capacity of water for indigenous species, we would encourage further investigation around the suitability of the Cultural Health Index (CHI) and similar tools developed based on Matauranga Maori.

ENM supports the exclusion of all stock types identified in Table 2 of the Consultation Document from water bodies.

ENM has questions about the practicalities and contestability regarding using a measurement of land slope (less than 15 degrees) to define whether land requires fencing or not. ENM would instead suggest mapping this nationwide, offering up this data as open source layers and referring to this in the regulation. This would provide defined areas where stock exclusion is required or not required, as a way to provide ease of implementation.

ENM would like to see more around:

- A link between drinking water sources in a region and the health standards for drinking water as defined by the Ministry of Health;
- The connection between surface water and groundwater;
- Lag factors causing quality issues caused by historical bad practice to materialise at later stages – The Minister for the Environment gave the example of the delayed impacts of a piggery operation on the groundwater in his community and the resulting need to implement a water treatment plant to provide safe drinking water to his community. How should these lag factors be factored into current freshwater unit management?

Economic use of freshwater

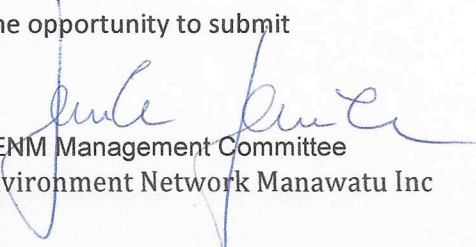
ENM supports the development of guidelines for councils to address existing or potential over allocation in catchments. This should include:

- The ongoing evaluation of likely water availability in light of climate change
- Enforcement of best practice in water use
- The assessment of net economic value – i.e. value net of short term and long term externalities (see the piggery example above)

ENM would encourage the government to give some particular guidance on

- Allocation of water for long term sustainable uses over short term gains – e.g. a trade-off between long term farming and short term (mining) activities
- Allocation of water takes for (bottled) drinking water exports in areas with known pressures on water availability (e.g. Hawke's Bay, Canterbury)
- Research into new economic income streams linked to water and soil restoration and enhancement initiatives

Thank you for the opportunity to submit
Warm regards,


Heike Schiele, ENM Management Committee
On behalf of Environment Network Manawatu Inc