

17 October 2019

To Whom It May Concern

RE: Action for Healthy Waterways

Manawatū River Source to Sea, a collective of 22 community groups with a focus on biodiversity including healthy waters and soils in the Manawatū River Catchment, wish to make the following general points regarding the “Action for Healthy Waterways”.

- We support the concept of “Te Mana o te Wai” as a way to express and uphold the value of water.
- We agree that the integrity of waterbodies needs to come first, and needs and wants of people second. Only if the waterbodies retain a high level of health, will humans’ needs be met in the long term.
- We also agree that more action is urgently required if we want to see a significant improvement within a generation.
- We welcome clearer directions from central government to Regional Councils.
- We are pleased to see:
 - o an explicit inclusion of wetlands in the new NPS-FW
 - o Safer levels of E-coli during the swimming season (1 November – 31 March) – and we expect councils to collaborate with communities in identifying sites for primary contact
 - o Inclusion of sediment as a new measurement
 - o Higher standards for MCI

We question:

- Why hydro-schemes have been exempted from improvements. This is at odds with the fundamental concept of Te Mana o te Wai, putting economic welfare before the health of waterbodies. – Surely, we should expect continuous improvements by all users of freshwater?
- How to strike the right balance between self-regulation around improvements (in particular where farming practices are concerned) and enforcing clearer rules where voluntary action is not far reaching enough.
- Whether enough thought has been given to monocultures in forestry (think radiata pine) and how they impact the long-term health of waters and soil. What can be learnt from overseas practices favouring permanent canopy cover and continuous harvesting in a sustainable manner.
- Whether new and emerging threats, such as the likely occurrence of microplastics in our three waters have been sufficiently considered.
- Whether some guidance needs to be given around infrastructure planning and implementation to take a more holistic view of freshwater ecosystem health. For

example roundabouts and other roading structures should be constructed to filter run-off with heavy metals and toxins into wetlands or soil rather than draining into stormwater systems that go untreated into waterways.

We submit:

- That the desired change can only happen if we have adequate resources in place to support the required
 - o Planning and Monitoring
 - o Improved practices in urban and rural catchments
 - o Land use changes where improvements to current practices will not be sufficient
 - o Engagement with and enabling of communities

As far as “working with communities” and “enabling communities to provide for their economic wellbeing” (Policy 13) is concerned:

Regional councils will have to work with large numbers of volunteers and volunteer groups striving to make Te Mana o te Wai become a reality. Progress towards the new proposal will most likely be hampered by the reliance upon so many volunteers trying to obtain life changing results with minimal or no funding.

“Achieving significant improvement within a generation” and having “Communities enabled to take action” requires substantially increasing the monetary investment by the government and/or regional councils to such groups as ourselves and the hundreds of others throughout New Zealand.

The investment in increased and on-going community funding would be a substantial move towards the vision of the new strategy becoming a reality. The cost benefit ratio of using volunteer groups is a well proven and effective method to not only get work done, but build thriving connected and contributing communities to work to protect what they have had a hand in creating/maintaining/protecting.

We urge the government to ensure that substantial additional funding will be made available to these very effective groups to ensure we all are able to contribute and make the vision of “Te Mana o te Wa” a reality, rather than only get part the way due to lack of funding.

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