



Wildlife Foxton Trust

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To whom it may concern

Re: Action for Health Waterways Submission

Wildlife Foxton Trust sits beside the Manawatū River Loop at Foxton, one of New Zealand's most polluted waterways only surpassed by Lake Horowhenua south on the other side of the river.

We wish to make the following points regarding the "Action for Healthy Waterways" document out for consultation:

- 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, with the needs and wants of people second. Only if the waterbodies retain a high level of health, will humans' need 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. Note here we have defined the swimming season whereas it has not been defined in documents sent out for consultation;
 - o Inclusion of sediment as a new measurement;
 - o Higher standards for MCI.
- Our local wetlands have been greatly reduced like the rest of New Zealand. We would like investigations into returning current regional floodplains of Moutoa to be returned to wetland and tidal flow – increasing local Manawatū river flood capacity and providing sediment trapping, as well as substantial birdlife and fish habitats – as well as providing natural water filtration thru extensive riparian planting.
- Removal of all grazing of animals on Matarapa Island – the land between the Loop and main Manawatū River at Foxton. **This is because the internationally recognised Ramsar feeding site runs along the west and north sides of this island. Alternatives would be fencing off edges of island at least 2 metres from high waterline to reduce run-off impact and/or** substantially decrease animal pugging depth under winter grazing.
- We appreciate the coverage of new standards for new fish passage structures but feel there needs to be additional work done by councils around having an inventory of all passages and existing passages being brought up to new standards over a period of time.
- It is also disappointing that the action plans have no teeth – so whilst regional councils are required to do them the action plans have not been defined, and there are no requirements to accomplish the actions and achieve freshwater improvements. Where is the guidance and accountability for Councils?

So to sum up, 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?
- If enough work been carried out to strike the right balance between self-regulation around improvements (in particular where farming practices are concerned) and costs to all users? Clearer rules where voluntary action is required is not far reaching enough. There are cost factors with every option and consideration needs to be given to who pays at the end – the public thru regional tax or central government taxes versus paying through increased prices for goods – user pays. Any system of self or statutory regulation has a cost – this cost needs to be minimized across all water users.
- 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 – has that been taken into consideration with these plans?
- Whether new and emerging threats, such as the likely occurrence of microplastics in our three waters have been sufficiently considered?

We submit:

That the desired change can only happen if we have adequate resources in place to support the required

- Planning and Monitoring;
- Improved practices in urban and rural catchments;
- Land use changes where improvements to current practices will not be sufficient;
- Engagement with and enabling of communities;
- Increased costs to achieve plans can be managed by those paying.

“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 Wai” a reality, rather than only get part the way due to lack of funding.

On behalf of Wildlife Foxton Trust