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Freshwater Consultation 2016
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RE: Next steps for fresh water

I am writing on behalf of the Waitakere Ranges Protection Society (WRPS) to submit on the consultation document *Next steps for fresh water* (hereafter the consultation document).

Background on the WRPS

The WRPS was incorporated in 1973. Its purpose is the conservation and protection of the Waitakere Ranges and to oppose any activity that may threaten or adversely affect the natural environment in the area.

WRPS and its members are strong advocates for the conservation and protection of the natural environment of the Waitakere Ranges and was one of the key groups promoting the concept of the Waitakere Ranges Heritage Area (WRHA) for 35 years before it was achieved through an Act of Parliament in 2008.

We have provided comments on the general issues raised in the consultation document that are likely to affect the Waitakere Ranges.

Fresh water and our environment

The primary consideration for managing freshwater and the environment should be improving the quality of freshwater and placing protection as the foremost issue. Freshwater is vital for sustaining life and needs to be managed in a way that ensures high quality water bodies as a top priority and ahead of economic considerations.

We support the management of freshwater within a unit rather than a region as it enables smaller scale consideration of issues and reduces need to 'trade-off' water quality across a region.

We support the use of macroinvertebrate monitoring as a mandatory measure to indicate stream ecological health.

We do not support regional councils being able to adjust environmental bottomlines for significant infrastructure. Environmental bottomlines are there because they are identified as the limit for sustainable use of a resource, in this case freshwater. Enabling councils to adjust this to allow for significant infrastructure could cause further degradation of freshwater and does not incentivise developing alternatives with fewer negative impacts.

Therefore, we consider that no significant infrastructure should be included in Appendix 3 and that this schedule should be removed. However, if it is to be retained, consultation with the public and consideration of the full environmental and social impacts of including any piece of infrastructure is vital. There should also be a timeframe for review of the inclusion of significant infrastructure in the appendix and requirements to ensure the project's operation is improved to be consistent with bottomlines.

Auckland's west coast includes some intermittently opening and closing lagoons. It is unclear whether the proposals in the consultation document apply to these lagoons. We support requiring these lagoons to be improved to meet high quality water standards. We do not consider that opening them is an appropriate method to improve water quality. We think councils should be required to undertake an assessment of water quality issues and possible remediation to address contamination sources around lagoons as a first priority.

We agree with regulation to exclude livestock from water bodies. However, we consider that the timeframes need to be brought forward with all stock to be excluded by no later than 2020. Livestock faecal contamination is a major issue in the Te Henga valley of the Waitakere Ranges and all animals, not just dairy, need to be excluded sooner than the proposed dates out to 2030.

Economic use of fresh water

We generally support the proposals to consider more efficient allocations and to take a whole of the water catchment view to the issuing of consents. However, we note that transferring consents must include a review of the relevant effects and ensure that appropriate mitigation is taken or that consents are not transferable if there will be negative environmental impacts.

We consider that the weighting in considering these issues should be on environmental protection ahead of economic considerations.

Freshwater funding

We support the Freshwater Improvement Fund and its use for projects that improve water quality in a broad range of areas, including urban and forest environments. We do not consider that there should be a minimum funding contribution, especially not \$250,000, as this could result in worthwhile initiatives not being eligible.

We do not support the use of this funding to mitigate the impacts of projects e.g. irrigation or water collection. These projects should be self-funding of any mitigation required as part of the total costs of the project. If a scheme is not financially viable due to mitigation needed to maintain freshwater quality then it should review its model, not receive taxpayer subsidies.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Edgar', with a stylized flourish at the end.

John Edgar ONZM
President
Waitakere Ranges Protection Society