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Women of New Zealand**
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Wahine O Aotearoa

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Introduction

The National Council of Women of New Zealand (NCWNZ) is an umbrella organisation representing 41 nationally organised societies with 33 branches throughout the country to which women from some 150 societies are affiliated. The council's function is to serve women, the family and the community at local, national and international levels through research, study, discussion and action. This submission has been prepared using comments from members of NCWNZ's Environment Standing Committee and from some individuals and groups of the wider membership.

NCWNZ Policy

NCWNZ is pleased to see that the matter of a sustainable supply of freshwater is being addressed, and hopes that once a policy has been developed as a result of the present discussions, action will be taken, as the signs of a developing crisis have been around for a long time. NCWNZ has long had an interest in water quality, and the membership has been aware since at least 1971 that the quality of our freshwater supplies could be compromised by what we dispose of as waste, domestically and industrially, into the waterways around us.

A resolution in 1971 called for public education in the use of detergents to minimise their pollutant effect, and another in 1984 called for legislation to control the quality of inland water and to protect aquatic ecosystems, while there was a more general call in a resolution of 1970 for more funding to be given to research into environmental pollution. This submission thus builds on established NCWNZ policy which is that as a nation, we must actively work to ensure that our freshwater supplies remain viable, not complacently continue to suppose that they will remain so without any effort on our part.

Executive summary

Respondents all emphasise that there is a need for urgency in clarifying the problems relating to water quality, and who is responsible for water usage planning and action now and in the future. In particular, a nationally acceptable standard for water quality must be determined as soon as possible, so that all planning and actions have something definite to work towards. NCWNZ members are concerned that unless responsibilities are determined very soon, human health, animal health and the health of ecosystems, both natural and engineered, will be put at risk. The need for public education about water supply is a matter for urgency, too. At present the general public belief is that water is an infinitely available resource, and should be free and readily obtainable, but this is erroneous, and the public must accept that water is a valuable asset which everybody has a responsibility to care for and to use economically.



**Specific comments****Page 8. Vision - Freshwater is managed wisely**

NCWNZ members agree with this vision.

Chapter 3. Issues for Action**1. National and regional strategic planning for water management could be improved.**

NCWNZ agrees that improvement is necessary. Those who manage water must move from a position of responding to demand to one where they foresee demand and set guidelines for managing these demands across the country, remembering however that geographic and climatic variations need to be taken into account when forming national guidelines. An active rather than a passive approach must be adopted, now that we can see that laissez faire has allowed an incremental build-up of many small effects to become the large problems that we now face of water shortage and substandard water quality.

2. Nationally important values need to be better addressed.

NCWNZ agrees that there needs to be a national overview with respect to water bodies of national importance, although local opinion should always be a part of forming national strategy. One respondent reminds us that values are not the same as standards, which can be quantitatively established and measured. Values are notional and less easily agreed upon.

3. Setting environmental bottom lines and allocation limits is costly and contentious

NCWNZ opinion is fairly unanimous that although the statement may be true, in order to hand on to our descendants a New Zealand that is worth living in, expense now will be justified by a reasonable standard of living in the future. The precautionary principle should be applied, and especially in regard to bottom lines, an optimal rather than a minimal standard should be aimed for. One of the costs of not setting bottom lines may be that industries that rely in large part on the use and appearance of water, for example the tourist industry, may find they can no longer operate at some future time.

Allocation of responsibility for paying for research is always contentious, but it is recommended that costs be shared by central government, industries, and those who receive direct pecuniary gains from water use.

4. Water is over-allocated in some catchments

Over allocation is an historical accident, since consents for water use have a life of thirty years, many of them still far from expiry. When consents come up for renewal, regional councils will have to enforce the new standards.

The situation has developed whereby formerly big rivers are reduced to a mere trickle in summer, as irrigation empties them out. This is not acceptable, especially as the irrigation practices adopted by some farmers are not economical. A better way of providing water would be to build reservoirs on high ground. Even so, it is a little alarming to read that MAF estimates it is feasible to irrigate a further 200,000 hectares nationwide, with good management.

While this may be good for agriculture, it may not be so good for ecosystems, because of changes in the soil chemistry, nor for recreation.



5. Tension between investment certainty and planning flexibility.

This is partly related to the previous issue. Current resource consent holders will have to accept that they have no ongoing right to a consent renewal, and should make decisions and plan accordingly. It is suggested that consents be issued for shorter times, and water users find other means of meeting their water requirements, for example by adopting less wasteful irrigation practices, and by planting crops and running animals which need less water.

NCWNZ supports the suggestion that a solution may be to change the way in which permits define water user's rights.

6. Maori participation in water management could be improved.

The RMA at present requires regional councils to consult with those who have manawhenua, but sometimes elected representatives have little understanding of Maori values relating to water. It is important that the Maori view be taken into account in any decision-making, and perhaps workshops could be held for councillors to help them understand Maori values.

7. A lack of effective action in the management of diffuse discharges.

Over enthusiastic growth of the farming sector has certainly seen more contamination of streams and rivers, both through animal discharges into waterways and through run-off from pastures. The dairy industry is to be commended for voluntarily self-monitoring its activities so as to reduce these sorts of discharge, but there may need to be a policy which will limit the number of dairy operations within any catchment, especially one that has high rainfall or extensive irrigation. Lake Taupo and its catchment area are at present under scrutiny by various scientific disciplines in order to determine what has caused its rapidly deteriorating water quality, and several lakes in the Rotorua region have been declared unfit for swimming this summer. This sort of thing should have been foreseen, and closing the stable door now is bound to be a very costly exercise. The fertiliser company Ravensdown has developed a fertiliser that retains nitrate in the soil for periods long enough for there to be greater uptake by pasture plants, but as yet trials have not shown that this will make much difference to run-off. Another solution to the problem of nitrates in water would be to return to the use of clover in pastures, but whatever means are undertaken to try to reverse the problem of contaminated water bodies, there will be considerable costs.

8. Development of water infrastructure is not keeping pace with demand.

NCWNZ members agree that this is so, and have some suggestions as to what could be done to ameliorate the situation, but perhaps the most helpful comment concerns land use management and conservation considerations. For many years, New Zealanders have been wasteful of water, in the domestic situation, in industry and in agriculture, and simply enforcing efficiency measures could defer the need for more infrastructure development. The New Zealanders of today have become aware of the limitations of water supply and quality, and have a responsibility to pass on their knowledge of the problem and to develop solutions to it, in order not to leave their descendants with the onus of fixing it.

Suggested Issue 9. Need to consider biodiversity.

Biodiversity is a stated priority for the government and should be considered alongside all the other issues which have been identified.

Suggested Issue 10. Natural ecology of waterways.

The natural ecology of all waterways is also important. Efficiencies of instream and wetland management such as weed and predator control and pollution management as well as reinstatement of degraded waterways are as important as hydro and irrigation projects.

**Suggested Issue 11. Urban water needs.**

Most of the above issues concern water used in agricultural areas, but there are specific urban considerations. Most towns and cities meet their needs for water by taking it from nearby rivers, and some of them discharge wastes right back into those rivers. Some suggested ways of providing water that is likely to be cleaner are by, as is done in the UK, building reservoirs for drinking water; collecting rainwater from roofs; and separating grey water from drinking water so that the former could be recycled within households.

Stormwater in towns and cities is polluted by the tar it runs over and by what residents put into roadside drains, before it is channelled back into rivers. Urban planning should allow for actions that minimise this sort of pollution.

Actions**1. Develop national policy statements.**

NCWNZ agrees with what national policy statements would be developed to do, but there must be clear time frames for accomplishing what is decided upon. Non-statutory guidelines do not have sufficient authority to prompt their being followed, but NPSs are more likely to have a successful outcome.

2. Develop national environmental standards.

NCWNZ members believe that this is very necessary, and but caution that when environmental bottom lines are set, they should not be minimal. The Ministry of Health already has standards for potable water, and perhaps these standards could be adopted as NESs for water generally. In some areas where there is poor management of diffuse discharges, the councils administering those areas would be better monitored and able to work more effectively using NPSs and NESs together.

3. Address nationally important values.

Identifying water bodies with nationally important values must be done with wide public consultation. Although providing sufficient electricity for the nation is a responsibility of government, communities whose rivers might be used for hydro-electricity projects are reluctant for any more such use of rivers. One respondent suggests that management plans for water bodies of national importance might be better if the local community has a large hand in their formation, looking for example to the plans of the Fiordland Guardians for managing that marine environment.

Current Water Conservation Orders have not been used very widely, as getting them in place takes time, but they could have greater use, and not be changeable once in place, as a future protection. It could be necessary to separate nationally important water bodies into two groups: those which have recreational or conservation value; and those which are valuable for water supply or use in industry. NCWNZ certainly agrees with the proposal that threatened water bodies should be prioritised for action and that, if necessary, new tools for management be developed.

4. Increase central government participation in regional planning.

NCWNZ supports this action, but the alternative approach is preferred, as the two bullet-pointed proposals do not seem to go far enough. The government must introduce national strategic policy, and planning legislation that serves as a standard for regions, to ensure a uniform standard throughout the country. However, there must not be political interference in regions.

5. Increase central government's support for local government.

Local governments are usually short of funding, and have an increasing workload, so central government could certainly assist by financial subsidy. This would do much more good than introducing a plethora of standards and statements. With regard to re-allocation of resource consents, central government would need to be involved as a follow-up of national policy.



6. Develop special mechanisms for regional councils.

NCWNZ is cautiously in favour of the proposal to give allocation of natural resources to regional councils, but hopes that economic benefit will not be their sole consideration. Clawing back could be difficult as doing so might impact on people's income, which would be undesirable, but setting out a clear statement regarding renewal of allocations should help to make it easier for consentees to plan for a possible loss of a consent. Regional councils would need central government help in managing their responsibilities with regard to water bodies of national value.

7. Enhance the transfer of allocated water between users.

NCWNZ is concerned that although water allocation transfers are acceptable when properties or concessions change hands, there would need to be a strong justification before any transfers between sites occurred.

9. Set requirements for regional freshwater plans to address key issues and challenges.

NCWNZ supports this action, but prefers the alternative approach of having central government approve regional plans, as this would ensure greater national consistency.

11. Enable regional councils to allocate water to priority users.

Potential users would need to make a good case for their having priority. NCWNZ is cautious about using market mechanisms as a means of allocating water, as those who are able to pay the most are not necessarily those who will subsequently manage their allocation with the greatest consideration for all its values.

12. Raise awareness of freshwater problems and pressures, and promote solutions.

NCWNZ as always is very much in favour of public education programmes, as knowing what the problems are, and realising that as individuals we can help to solve them, in almost every situation leads to voluntary compliance with whatever regimes for recovery are suggested.

NCWNZ is pleased to have had the opportunity to comment on this very concerning matter, and looks forward to seeing what decisions arise from the wide public consultation. NCWNZ also looks forward to seeing decisions that take into account not only the economic questions that arise from the present problems New Zealand faces with its water supplies, but also the environmental, health and social aspects that would have to be faced if the difficulties are not solved satisfactorily.

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