



Submission of Aotearoa Water Action on the Essential Freshwater Package

1. Aotearoa Water Action would like to make the following brief comments on the draft NPSFM
2. Firstly, we fully support the direction taken in the discussion document and would like to congratulate the Ministry staff for the work they have done.
3. Secondly, rather than detailing our position on each issue we'd like to support the position of the Environmental Defence Society set out in their submission. We support that submission in its entirety including the proposed drafting amendments. We would however like to add a couple of points for discussion or emphasis as follows:
4. The quality of our surface water and shallower ground water is now alarmingly poor in many parts of NZ. For too long our economic system has prioritised GDP growth, export receipts, overseas Investment, development, and the promise of jobs, over the health of our water and communities. That must stop right now. We hope that as the panel considers these submissions it will remember that there is a significant financial cost incurred by ratepayers, taxpayers and citizens when we go about treating water, treating sick people and animals, removing chlorine from drinking water, informing communities of contamination, recharging aquifers, rehabilitating ecosystems and buying bottled water. There are also long-term economic costs incurred when we lose our precious soil as run-off.
5. If the toughest options become a part of the new directives it will undoubtedly be hard on some families and communities but not nearly as hard as it will be for future generations if we don't take strong action now. Our position is that in finalising these regulations the Government must start as it means to continue – by upholding the proposed te mana o te wai hierarchy i.e by prioritising the health of water and then people ahead of other considerations.
6. We want to emphasise our support for the proposed Te Mana o te Wai hierarchy of obligations - that the first priority is the health of the water, the second priority is providing for essential human health needs, such as drinking water, and third is other consumption and use.
However, in our opinion there must also be a hierarchy for 'other consumption and use'. We can not protect te mana o te wai or te mauri o te wai if we continue to ignore the cultural, environmental and social effects of the way in which we use water i.e. if we continue to ignore the effects of 'other' uses of water – such as irrigation - on water.

AWA believes the Government should direct regional councils to create rules in their plans to allocate water amongst competing activities. Powers granted under s30RMA allow them to do this and we would argue that Part 2 s5 requires them to do so.

7. We do believe this package can improve water quality but only if it is properly resourced. Therefore, we would support funding over and above the proposed \$220 million. We also strongly support the establishment of the proposed independent freshwater commission and the proposed new planning process for freshwater (subject to seeing the detail).

If the package it is not properly resourced, we believe that the high farming debt levels in some parts of the country may just tip the balance in favour of foreign ownership and uses of land and water other than food production. Already many farms have varied their water consents to allow for water bottling. Other farms are being sold for plantation forestry. We'd like the Government to be sure it will not be fixing one set of problems by creating another. Therefore, we suggest reassessing not only the proposed funding package but also our overseas investment regulations to avoid unintended consequences.

We would also like to see the Government add provisions to the NPSFM directing regional councils to include a rule in their plans prohibiting the use of water for water bottling. This would effectively place a moratorium on new applications for consent for this activity.

We'd also like to see some of the \$30 million that the Government spends each year on foreign investment (via the IGF fund) redirected to supporting this package of work.

8. Another point we'd like to make is that the regulations should be as efficient as possible – ensuring that funds are not wasted on consent application when they would be better spent on fences and riparian/wetland planting. Therefore, we support tough permitted activity rules and use of prohibited activity status for some activities (such as winter grazing) but do not support compulsory farm plans.
9. We strongly support in principle the Ministry's proposed direction on stormwater, wastewater and protecting drinking water catchments and look forward to submitted on the detail in the future.
10. Finally, this package fails to consider the impact of other contaminants such as pesticides, herbicides, hormones and antibiotics. These toxins are commonly used but their impact on water bodies remains unmonitored and unregulated. We point this out only to suggest that the Ministry's work in this space is far from done.

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N.B. We would like the opportunity to speak to the select committee.