



**SUBMISSION: Clean Water**

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A handwritten signature in black ink, appearing to read "Andrew Curtis".

**(Andrew Curtis, CEO IrrigationNZ)**

IrrigationNZ is keen to further engage with the ministry over the points made in this submission.

**OVERVIEW**

1. IrrigationNZ (INZ) is a national body that promotes excellence in irrigation. INZ represents the interests of over 3,600 irrigators (irrigation schemes and individual irrigators totaling over 360,000ha of irrigation (over 50% of NZ's irrigated area). It also represents the interests of the majority of irrigation service providers (over 150 manufacturers, distributors, design and install companies and consultancies).
2. An irrigators business is founded on certainty. This includes access to a reliable water supply for irrigation and the ability to dynamically farm their land. It is this certainty that enables investment and continuous improvement in resource use efficiency and thus good environmental performance. Without certainty, they and the considerable flow-on benefits to the regional economy are severely impacted. The national economy would also be impacted upon given NZ is predominantly an agricultural export based economy.

## Submission

Issue	Relief Sought
<p><b>1. Te Mana o te Wai</b></p> <p>INZ is supportive of the inclusion of Te Mana o te Wai, however through changes to Appendix 1, it has now become hierarchal - the economic and some social values of freshwater use have been significantly diminished.</p> <p>The economic use of water underpins many provincial communities in NZ, grape-growing in the Marlborough region for example. The use of water for irrigation is the region's life-blood and Hauora o te Tangata (the health of the people) depends on it. It is therefore important that economic uses are considered equally when setting freshwater values and objectives.</p> <p>INZ has received advice the changes made within Te Mana o te Wai mean the NPS no longer gives effect to the purpose and principles of the RMA.</p> <p>As a result, INZ does not agree with the assessment made in the Regulatory Impact Statement – that the changes made to Te Mana o te Wai impose minimal new impacts.</p>	<p><i>Appendix 1: National Values and uses for freshwater</i></p> <p>Remove the heading 'Extractive uses' and have Water supply; Animal drinking water; Irrigation and food production; Hydro-electric power generation; and Commercial and industrial use, fall directly under the Te Hauora o te Tangata heading.</p>
<p><b>2. Economic Well-being</b></p> <p>It is important that the social and economic impacts of any changes to the way communities use water are well understood before any transition pathway is set.</p>	<p><i>Preamble paragraph 11</i></p> <p>Where changes in the way communities use water are required, the pace of those changes should take into account <u>social and economic</u> impacts.</p>

<p>INZ does not agree with or understand the proposed new hierarchy in Objective A2. Through this the importance of economic values have been diminished.</p> <p>INZ agrees with the changes made to objective B1, providing social considerations are added in alongside economic.</p> <p>INZ agrees with the change made to Policy CA2 (f) iaaab.</p>	<p><i>Objective A2</i></p> <p>The overall quality of fresh water within a freshwater management unit is maintained or improved while:</p> <p>a) protecting the significant values of outstanding freshwater bodies;</p> <p>b) protecting the significant values of wetlands; <del>and</del></p> <p>c) improving the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated; and</p> <p><del>d) then</del> providing for <u>social and</u> economic well-being, including productive economic opportunities, within environmental limits.</p> <p><i>Objective B1</i></p> <p>To safeguard the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems of fresh water, in sustainably managing the taking, using, damming, or diverting of fresh water, while providing for <u>social and</u> economic well-being, including productive economic opportunities.</p> <p><i>Policy CA2 f) iaaab.</i></p> <p>Support the addition to Policy CA2 f) iaaab.</p>
<p><b>3. Primary Contact Recreation</b></p> <p>It is extremely unclear what ‘more of these rivers will be swimmable for more of the time’ means and how Regional Councils will work together to achieve this.</p>	<p><i>Preamble paragraph 14</i></p> <p>Delete ‘The expectation is that more of these rivers and lakes will be swimmable more of the time’.</p> <p>Replace swimming and swimmable with primary contact recreation.</p>

The use of the words 'swimmable' and 'immersion' is not supported as their definitions will create ambiguity. They should be redefined as primary contact recreation as per the LAWF recommendations.

*Objective A3*

The quality of fresh water in large rivers and lakes is improved so the risk to human health is reduced and they are suitable for ~~immersion~~ primary contact recreation more often.

*Policy A5*

By every regional council making or changing regional plans to the extent needed to ensure the plans:

- a) identify large rivers and lakes and whether they are suitable for ~~immersion~~ primary contact recreation and;
- b) state what improvements will be made to large rivers and lakes so they are suitable for ~~immersion~~ primary contact recreation more often and over what timeframe.

For purposes of A5(a), suitable for ~~immersion~~ primary contact recreation means large rivers and lakes in Attribute State A, B or C in the E. coli attribute table in Appendix 2 of this national policy statement.

*Policy CA2*

- f) considering the following matters at all relevant points in the process described in Policy CA2(a)-(e):
  - iaaa. how to improve the quality of fresh water in large rivers and lakes so the human health risk is reduced and they are suitable for primary contact recreation ~~immersion~~ more often;
  - iaaab. how to provide for economic well-being, including productive economic opportunities, within the context of environmental limits;

	<p><i>Appendix 2: Attribute tables</i></p> <p>Value: Human health for recreation; Narrative Attribute State: Replace the words ‘swim’ or ‘swimming’ with primary contact recreation.</p>
<p><b>4. Ki uta ki tai (Mountains to sea)</b></p> <p>INZ strongly supports the additions to Policy C1. Only by taking this approach will sustainable outcomes be reached for each freshwater management unit, and long-term certainty be gained for the user. The ‘mountains to sea’ approach also helps communities better explore catchment scale opportunities for environmental improvement alongside economic gain – ‘finding the win-win’.</p>	<p><i>Policy C1</i></p> <p>Support the changes to Policy C1</p>
<p><b>5. Regional Council Engagement</b></p> <p>It needs to be made clear that communities must be a part of developing freshwater objectives for all freshwater units.</p>	<p><i>Policy CA2</i></p> <p>By every regional council, <u>through following discussions with their</u> communities, including tāngata whenua, applying the following processes in developing freshwater objectives for all freshwater management units:</p>
<p><b>6. Maintain and Improve</b></p> <p>INZ does not agree with the changes to Policy CA2 e) iia.</p> <p>It is important to remember community-agreed freshwater management unit values and objectives are what communities are striving to achieve – they are the outcomes.</p> <p>Different combinations of attributes and their states can interact in different ways to achieve these. For example, attributes such as nitrogen, phosphorus and sediment concentrations, water temperature (shading through habitat restoration) and flows, can all be tweaked in many ways to achieve a desired state in a river.</p>	<p><i>Policy CA2 e)</i></p> <p>e) formulating freshwater objectives:</p> <p>i. in those cases where an applicable numeric attribute state is specified in Appendix 2, in numeric terms by reference to that specified numeric attribute state; or</p> <p>ii. in those cases where the attribute is not listed in Appendix 2, in numeric terms where practicable, otherwise in narrative terms;</p>

<p>It is important communities are given full flexibility to achieve a freshwater management unit's values and objectives, rather than be constrained through individual attributes having to remain within (not go below) their existing attribute state.</p>	<p>ii. in those cases where a freshwater objective seeks to maintain overall water quality in accordance with Objective A2, by every regional council ensuring:</p> <p>a. <del>where an attribute is listed in Appendix 2, that freshwater objectives are set at least within the same attribute state as existing freshwater quality; and</del></p> <p>b. <del>where an attribute is not listed in Appendix 2, that freshwater objectives are set so that values identified under Policy CA2(b) will not be worse off when compared to existing freshwater quality; and</del></p> <p>iii. on the basis that, where an attribute applies to more than one value, the most stringent freshwater objective for that attribute is adopted; and</p>
<p><b>7. Exceptions</b></p> <p>INZ agrees with the additions to Policy CA3, providing the reference to renewable electricity is replaced with significant water infrastructure.</p>	<p><i>Policy CA3</i></p> <p>...For the purpose of CA3(b)(i) benefits provided by listed infrastructure means the positive effects of the infrastructure on the well-being of the community and can include, but are not limited to, <u>significant water infrastructure</u>, <del>renewable electricity generation</del>, employment and economic well-being.</p>
<p><b>8. Freshwater Improvement Fund</b></p> <p>INZ is extremely supportive of the Freshwater Improvement Fund and its criteria</p>	<p><i>FIF criteria</i></p> <p>Support the proposed criteria for the Freshwater Improvement Fund</p>