



## **Submission of Civic Trust Auckland**

### **National Policy Statement for Freshwater Management**

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### **Civic Trust Auckland**

Civic Trust Auckland (CTA) is a non-profit public interest group, incorporated in 1968, with activities and interests throughout the greater Auckland region. CTA makes submissions on a variety of issues, both with regard to Auckland, as well as the country as a whole. We submitted on the Freshwater Consultation 2016.

The first two objects of our Trust are:

- a) To promote the preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, lakes and rivers (including their margins), associated flora and fauna, and protection of this natural character from inappropriate subdivision, use and development.
- b) To promote the maintenance and enhancement of public access to and along the coastal marine area, lakes and rivers.

### **Swimming targets**

1. Civic Trust Auckland (CTA) supports standards for our rivers and lakes that will make them safe for everybody to swim in at all times, and so this amenity will also be available to future generations.
2. Every river or lake that is polluted should be cleaned up to a standard that is safe for humans.

### **Proposed amendments to the National Policy Statement for Freshwater Management**

3. CTA would like to see the E.coli attributes strengthened.

4. We support the inclusion of smaller rivers and streams (below order 4) in the swimming standards, as these are places that are often used as a resource by local communities for swimming and other activities.

5. We support the requirement for regional councils to adopt a Macroinvertebrate Community Index (MCI) score of 80 as a minimum threshold, and to develop an action plan to improve the MCI score to above this threshold, or when monitoring shows there is a downwards trend in the MCI.

6. We support the adoption of all the recommendations made by the Land and Water Forum to assist regional councils to limit two key nutrients in New Zealand's rivers and lakes: nitrogen and phosphorous.

7. The NPS should include in its objectives and policies the requirement for regional councils to meet water quality targets within specified timeframes.

8. CTA considers the introduction of a new test requiring environmental and ecological considerations to be balanced against economic ones unacceptable, as this could result in freshwater objectives or quantity limits that do not achieve ecosystem health.

#### **Proposed stock exclusion regulation**

9. The proposed deadlines for excluding dairy support, deer and beef cattle from waterways over 1 meter wide, lakes and wetlands should be brought forward as follows. The 2022 deadlines should be brought forward to 2020, the 2025 deadlines should be brought forward to 2022, and the 2030 deadlines should be brought forward to 2025.

#### **Other comments**

10. The waterways of our country also need to be ecologically healthy, in order that the native species and other creatures, as well as the ecosystems that need clean water can survive and thrive.

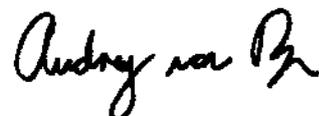
11. Many of our rivers and lakes are very polluted. Requiring only the worst of these to be cleaned up is not good enough.

12. We need better rules that will stop pollution before it gets to rivers, like a moratorium on new dairy farm conversions, ending subsidised irrigation, and better urban and sewage design in our towns and cities.

13. If recommendations have been made by concerned and informed individuals and groups, such as the Land and Water Forum, these should be heeded.

Date of submission: 28 April 2017

Signature:



Audrey van Ryn  
Secretary, Civic Trust Auckland