

Submission to the Ministry for the Environment on Proposed National Environmental Standard on Ecological Flows and Water Levels

NCWNZ is an umbrella organisation representing 46 Nationally Organised Societies and National Members. It has 27 branches throughout the country attended by representatives of those societies and some 150 other societies. The Council's functions are to serve women, the family and the community at local, national and international levels through research, study, discussion and action.

Introduction

NCWNZ has had an interest in the subject of water management since 1980. In 1998 a resolution was passed to retain public ownership of water supply systems. In February 2000, in a submission to the MfE on "Making every drop Count: The National Agenda for Sustainable Water Management Action Plan" NCWNZ suggested that "...consideration be given to the promotion of water conservation to reduce wastage. We need to have a change in mindset from regarding water as of little value to that of an essential and limited resource." NCWNZ welcomes the opportunity to comment on the proposed NES on Ecological Flows and Water Levels. Several branches and members of the Environment Standing Committee responded.

Members were asked to comment on the following questions from the document:

1. Problem statements and issues:

Do you agree with the problem statements and the three key problems that were identified as benefitting from national direction?

Responses:

The majority agreed with the problem statements and key problems covered that would benefit from national direction. A majority of members also expressed concern that future Governments might invoke discussion document 1995, written for NZ by C.S. First Boston Bank for reform of the Water Industry, which promoted privatisation (as the most efficient way to allocate water.) NCWNZ would still support the original 1998 resolution to retain public ownership of water sources. Whoever controls scarce resources can control the economy.

7. The need for an NES on the selection of technical methods

Do you support the aim to improve consistency in the election of methods for assessing ecological values? Does consistency need to be provided in a national environmental standard, or would guidance documents be sufficient?

Responses:

The majority supported the need for an NES. In one branch, the majority felt that a guidance document would be sufficient. This branch also endorsed the Auckland Regional Authority Submission. It was also thought that causes and regional climatic variations would need to be

considered within the Standard.

Other concerns raised by members are as follows:

The majority supported an NES, as being a better option than the status quo. The status quo has given New Zealand the problems in Canterbury, caused by the permits for irrigation to many dairy farms, which may have resulted in some wells in the area running dry. Water problems are also increasing in the Waikato, with nitrate run off from dairy farms, and in the Taupo – Rotorua area. In the Waikato, the ground water is no longer suitable for drinking. It was noted that appropriate land use needs to be considered along with water use.

Section 3, page 15:

It was noted that under 3.1.1 and 3.1.2: *some water levels are not known, and the existing environmental flows and water levels do not always clearly define the available water.* In these cases, the majority of members thought that the precautionary principle should be included in interim levels.

General:

There was general concern from members that huge amounts of water are being used by new enterprises, some of which appear to be threatening water reserves. Telling people they could not do what they wanted on their own land was not a popular stance. Therefore making some national ruling would take the heat off the regional councils and those granting resource consents.

Nancy Tuaine is the spokesperson for the Whanganui River Maori Trust Board. At a meeting with Bob Zuur, scientist from MAF, she said that “Water is a taonga (treasure) not a commodity.” Local Iwi want to be included at the table for any discussions, and NCWNZ would support this.

There was a mixed response to most questions, with many saying the document was very complex, and would require much more time to respond to in detail.

Conclusion:

An excellent summary received is quoted below:

“There is no doubt that we are approaching a crisis in natural water management in NZ. In a country which has such an abundance of high quality water it is a sad commentary that we are suddenly in such a state. The current regional action in Canterbury, Southland, Bay of Plenty and Waikato highlight our desperate need to attack the problem. The failed national water classification scheme of some 35 years ago must give some guidance to the difficulty of attacking the problem by producing national standards. When these were argued in court the system fell over.

“The discussion document is, in its intent, a laudable one which, in its execution, falls well short of its stated outcomes and objectives. Certainly there is a need to have objective standards for the management of water, but this document in addressing flows only in an ecological context will do little to *'improve the management of the undesirable effects of land use on water quality'* (Executive Summary National outcome #3). Any attempt to achieve this lofty goal must simultaneously address both quantity and quality of water flows.

“The proposal is an engineering solution to a complex engineering and ecological problem that will not be solved by objectives couched in undefinable terms that can

and will be argued in court.

“The problem statements clearly define some of the major flow issues, but in defining all the problems as issues of flow, leaves out any issue of quality which is central to the objectives.” *Professor Warwick Silvester, Waikato University*¹.

New Zealanders have been fortunate in the past to have plenty of good water. The 2008 summer is one of many that have shown that this may not continue in future.

Christine Low
National President

Sara Dickon
Convener, Environment Standing Committee

¹ Warwick Silvester, Professor of Biological Sciences, University of Waikato.