

**Ministry for the  
Environment  
Action for  
healthy waterways**

**17<sup>th</sup> October 2019  
(Extended to 31 October)**

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## **Submitter details**

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Ministry for the Environment's *Action for healthy waterways*.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.
3. This submission sets out particular matters of interest and concern to NMH.

## **Specific Comments**

4. NMH welcomes the opportunity to comment on the *Action for healthy waterways* that looks at making improvements to New Zealand's freshwater environments.
5. It is hoped that the proposed changes in the National Policy Statement on Freshwater, Freshwater National Environment Standard, Drinking water and Waste water standards will result in material improvements in fresh water quality by 2025.
6. *Question 9:* NMH supports the revised wording regarding Te Mana o Te Wai in the NPS-FM because this clearly articulates expectations for Councils when they implement the NPS-FM. NMH supports the introduction of a hierarchy of obligations – to the health and value of waterbodies first, then to the essential needs of people, and finally for other uses.
7. *Question 13:* NMH supports elevating the status of mahinga kai to a compulsory value so that regional councils support tangata whenua to develop attributes that are specific to their catchments.
8. NMH supports giving priority to tangata whenua freshwater values. This proposal complements the proposal in paragraph six which will assist to embed Te Mana o Te Wai in freshwater management.
9. NMH supports the requirement for Regional Policy Statements that includes a long-term vision that gives effect to Te Mana o Te Wai as this will give communities direction for the management of fresh water within their specific regions.
10. NMH supports the introduction of integrated management policies within the NPS-FM to direct territorial authorities to manage the effects of urban development on water.

11. *Question 17:* NMH supports the introduction of a new freshwater planning process that requires Councils to have new plans in place, consistent with Te Mana o Te Wai, no later than 2025.
12. *Question 25 (5.6) Wetlands* improve water quality. Wetlands protect shores from wave action, reduce the impacts of floods and absorb pollutants. They provide habitat for animals and plants and many contain a wide diversity of life<sup>1</sup>. Less than ten percent of New Zealand's original wetlands remain so it is vital that the remaining wetlands are given strong protections. NMH supports the requirement for regional councils to identify all existing national inland wetlands, monitor their health, and to set policies to protect wetlands.
13. *Question 27 (5.7)* NMH supports the approach taken to protect rivers and streams through a mitigation hierarchy where activities that cause the most damage are prevented.
14. *Question 30 (5.8 Water quality)* NMH supports strengthening restrictions around nutrient levels. Limiting nutrient pollution will reduce the greenhouse emissions and improve ecosystem health. NMH supports the new bottom line for nitrogen in rivers at an annual median of 1.0mg per litre dissolved inorganic nitrogen and supports a bottom line for phosphorus in rivers at an annual median of 0.018 mg per litre of dissolved reactive phosphorus.
15. *Question 36 (5.10 Water Quality)* NMH supports the approach to improving water quality at swimming sites using action plans that can be targeted at specific sources of faecal contamination. NMH supports the introduction of Quantitative Microbial Risk Assessments.
16. It is noted that in the interim that the bottom line for swimming spots would be 540 *E. coli* per 100 mL. NMH recommends that the proposed action plan includes actions to be taken to address swimming spots that have ongoing elevated *E. coli* levels in order to improve long-term recreational water quality.
17. NMH notes that the Freshwater Science and Technical Advisory Group (STAG) report<sup>2</sup> recommends that there is an urgent need to update the 2009 guidelines for cyanobacteria in recreational waters and that there is an increasing concern over the proliferation of cyanobacteria in rivers that experience low flow conditions that may be associated with water allocation and may intensify with climate change.

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<sup>1</sup> <https://www.environment.gov.au/water/wetlands/about>

<sup>2</sup> <https://www.mfe.govt.nz/sites/default/files/media/Fresh%20water/freshwater-science-and-technical-advisory-group-report.pdf>

Therefore NMH recommends that the updating of these guidelines is included within the scope of these freshwater management changes.

18. *Question 36 (5.11 Minimum flows)* When setting minimum flows in waterbodies used for human drinking water, regional plans will need to acknowledge the possibility of periods of extreme drought and how to balance the human needs and ecosystem health. This will become increasingly important as extreme weather events occur as a result of climate change.
19. *Question 43 (6.3 Drinking Water)* NMH supports the proposal to reduce the supply population that triggers the Drinking Water Source NES from 500 down to 25. There are many large communities around New Zealand such as Motueka which are reliant on water suppliers serving less than 25 people or single household bore water, the proposed NES should be cognisant of these populations in order that these communities have access to safe drinking water.
20. NMH recommends that the NES includes the protection of water quantity for sources of human drinking water. In the last few years, the over allocation of water sources has impacted on the reliability of drinking water sources in various communities. The NES must require councils to consider whether an application for a water take (e.g. for irrigation) is likely to negatively impact on the reliability of a drinking water source.
21. *Question 46 (7.4 Wastewater)*: NMH supports the introduction of a National Environmental Standard for Wastewater Discharges and Overflows. Wet weather or dry weather overflows often impact marine recreational water spots resulting in risk to public health.
22. The proposed Standard needs to ensure a strong emphasis on contingency planning that includes both engineered consideration (e.g. emergency holding capacity at pump stations) and risk mitigation plans that incorporate the protection of public health in the event of discharges to recreational water. Such plans need to be interoperable with NZ Microbial Water Quality Guidelines (for both freshwater and marine water).
23. NMH supports the inclusion of national targets and limits on the volume and frequency of wet weather and dry weather overflows from pump stations as this would clarify Council reduction targets.
24. NMH supports the inclusion of risk management plans that outline the risks to environment, people or property and actions that would avoid, remedy or mitigate these risks. It is hoped that by reducing wastewater overflows there will be an

improvements to the safety of mahinga kai, and contamination in public reserves and road verges where contaminants in stormwater can pool on private land.

25. In addition, NMH recommends that there are specific requirements that manage wastewater overflows within stormwater in relation to private domestic water bores or shallow community drinking water supplies.
26. NMH supports the requirement for Councils to produce risk management plans that address how Council will meet the standards in stormwater network discharge consent standards or permitted activity standards. This will bring key risks regarding stormwater contaminants to the forefront and people will understand the nature of the problem and the impact of potential interventions.
27. In addition, NMH supports the STAG recommendation that more research is undertaken regarding emerging contaminants including the effects of human and ecosystem health of micro-plastics and chemicals, infectious diseases and microbial resistance to antibiotics, copper, zinc and other urban contaminants in stormwater networks, and heavy metals and trace elements in food production systems.
28. *8. Improving farm practices* NMH support in principle the overall changes proposed in relation to reducing pollution of high risk activities on farmland, and the continuation of farm planning to support continuous improvement in environmental management.
29. *Question 65 (8.5 Excluding stock from waterways)* NMH support prevention of contamination from a public health point of view, partly because there is the possibility of transmission of diseases (such as viral) from catchment contamination of not only recognised diseases, but diseases transmitted by viruses etc. that may as yet be unrecognised. Taking a protection approach to catchment protection is appropriate. Consideration should also be given to using hedging from native species to improve the natural environment.
30. NMH acknowledges that the Discussion Document includes a section on *9.2 Practical Advice and Support for Farmers (9.2)*. However there is no mention of improving the rural community psychosocial resilience to adapting to change and adversity. The changes outlined within the proposal are substantial for those in the rural sector, consideration should also be given to the wellbeing effects for farmers implementing the changes and support should be provided.

## Conclusion

31. NMH thanks the Ministry for the Environment for the opportunity to comment on the *Action for healthy waterways*.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'P Bramley', with a stylized flourish at the end.

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