

Healthy Rivers Submission April 2019 by Roderick Aldridge  
Submitter Number 73788

Thank you for the opportunity to address my concerns about the Healthy Rivers Plan Change 1 and to hear my suggestions.

Firstly I would like to commend the Waikato Regional Council for using the Stakeholder Planning Group to reach an agreed solution based on flexibility and compromise by the stakeholders. It failed because if anybody challenges the resulting agreement the adversarial RMA hearing process takes over. It would be so much better if a positive process could be used. Despite this ultimate failure it did help many people to understand the issues better and the necessity of finding a solution which meets the needs of everybody concerned. I think the hearing process has been less adversarial than it otherwise would have been.

It highlighted for me the difficulty of finding a solution to a social, environmental and economic problem using a rigid and complex adversarial legal system when what is required is flexibility, cooperation and compromise.

I would also like to thank those who have evaluated submissions, fitting them into the rigid legal system while making it coherent enough to be understood by ordinary citizens. Despite their efforts I still struggle to formulate my submission in the required way.

It is clear that the biodiversity and health of freshwater systems is continuing to deteriorate as it has over the last four decades. See **References** at the end of this document. Together with the effects of Climate Change it is more urgent than ever to find restore the health of the Waikato river system.

The main points I would like to make before I try to fit them into the RMA straightjacket:

- The causes and urgent need for action made in my original submission apply even more urgently now that the effects of Climate Change are stronger and more rapid than we realised – sea level rise and more frequent and extreme weather events in particular (which we have already seen in other parts of the country).
- The wholesale change to the habitat/catchment, particularly since 1840's - Forests have been converted to agriculture, rivers have been dammed, floodplains have been cut off by stop-banks, wetlands have been drained, species have become extinct, invasive species have been introduced, (a significant number have become invasive pests), urban areas have been paved over ..... This has caused profound degradation of ecosystem health.
- The effects continue long after the activities are stopped
- It is a dynamic system, changing all the time. When the environment changes the ecosystem changes in response. Once a new ecosystem has become established it can't just be changed back, even if you can restore the previous environment – which you usually can't anyway. The same principle applies to all factors causing deterioration of the health of the rivers.
- Therefore we need to act swiftly to change the factors causing degradation and restore healthy rivers and freshwater bodies as soon as possible before any more tipping points are reached and more ecosystems are irreversibly changed.

The RMA seems to lead inevitably to measures being defined negatively - in terms of what activities aren't permitted or limits that can't be exceeded. This usually results in the set maximum levels becoming the minimum in practice, often compounded by not being effectively enforced. It would be

much better if measures could be defined in terms of best practise that should be followed with rewards/incentives for compliance and penalties/disincentives for non-compliance.

I don't see any simple or practical way this can be done under the present RMA. If the Panel can see a way of incentivising good practise instead of trying to limit bad practise I would strongly support it.

Success should be measured by the health and biodiversity of ecosystems, but this is difficult to measure, so instead it measures and sets limits to harm factors - levels of nitrogen, phosphorus, sediments and microbial contaminants. But this does not necessarily correlate well with what is necessary to ensure the health of a particular catchment or sub-catchment.

Limits and requirements should be tailored at the ecosystem or sub-catchment level to promote the most sustainable and productive land use.

**I confirm that I continue to support the provisions and seek the decisions by The Waikato Regional Council in my original submission.**

In conclusion I would like to emphasise the following points:

Farmers/landowners should be able to change to any system that gives a better sustainable environmental, social and economic effect and be rewarded for doing so. They should not be limited to changing from farming to forestry.

Overseer is a very blunt instrument to use as the main determine whether the environmental effects of farming operations are meeting a required standard for Farm Environment Plans. I therefore support calls for a Overseer to be replaced and/or supplemented by more comprehensive tools.

The changes need to take effect as soon as possible, but few actual changes are required in the first stage – PC1. Instead most current activities and practises are able to continue for 10 years “grandparented” The most effective changes need to be made in the first stage before further degradation occurs. They will be much more difficult, disruptive and expensive later.

PC1 should allow the period of the stages to be set progressively to allow changes to happen at the most opportune time. Measures allowing current activities to continue (grandparenting) should be temporary –only to give time to change to better practises. It should not be a licence for bad actions to continue at current levels.

I therefore support calls for all FEPs to be required at the first stage and for these to be evaluated according to the actual state of the farming operations, so that those already following good practise are not at a disadvantage compared with those who don't.

There needs to be a strategy to systematically restore many wetlands and riparian strips so that they can protect waterways from floods that will become more frequent and extreme with Climate Change. The Plan Change should provide for this to happen in cooperation with central government, starting with the most vulnerable catchment schemes e. g. those vulnerable to sea level rise. This will enable restoration of healthy waterway ecosystems and avoid spending to defend catchment schemes which are ultimately indefensible.

## **References**

The Listener article of 26 November 2015 by Rebecca McFie is available at “

<https://www.noted.co.nz/archive/listener-nz-2015/river-stance-mike-joys-controversial-crusade-to-save-new-zealands-waterways/>

It tracks Mike Joy's journey from farmer and fan of farming to concerned citizen, then scientist, to activist campaigning for healthy waterway ecosystems.

The article by Mike Joy on the Environmental Tab at <https://www.stuff.co.nz/>

'Agency Capture' shifting goalposts on environmental issues'

<https://www.stuff.co.nz/environment/88264980/mike-joy-agency-capture-shifting-goalposts-on-environmental-issues> documents evidence that the ecosystem health of our waterways continues to decline despite the misleading ways it is portrayed in government agencies and other media.