Comments on the GW Objectives S42A report, by Pat van Berkel

Document: **HS2-S42A-Objectives-S42A-report-1.pdf**

1. Para 106 refers to my submission S282.002 seeking *a requirement be included that water quality improvement is staged, with the timeline published and updated each year*. The S42A analysis rejects this - through a misinterpretation of the intent of this requirement. It was interpreted as a monitoring requirement but in fact it is a future project planning requirement. I recommend that a staged plan through to 2100 be published, in the form of a timeline, that clearly shows the future steps to achieving wai ora, healthy waters. Furthermore I recommend that the timeline is confirmed / updated each year.

This timeline would show which water bodies are being prioritised so we all know where the upgrades are taking place. Communities and Councils can then work together to achieve wai ora.

Para 120 refers to achieving the wai ora timeline by 2100. My recommendation S282.002 merely requests that the whole future wai ora timeline be published now. Obviously the more distant years won't be in detail, but ballpark progress can be shown along the whole timeline. This timeline provides a measure for GW and the public to see the progress towards achieving wai ora by 2100 rather than progress to a short-term goal and losing the context of the whole path to 2100.

2. Para 118 refers to my submission S282.005 which requests a *reference to the Mangaroa Peatland* in the NRP. The S42A analysis rejects this request. The analysis however omits the extraordinary value of the Peatland regarding climate change. When the Peatland is healthy it sequesters enormous amounts of carbon. When the Peatland is unhealthy it not only fails to sequester carbon but it also emits carbon. Peatlands are an important component of achieving climate change targets. The Mangaroa Peatland is comparable, if not superior, to the Queen Elizabeth Park wetland in its ability to reduce carbon in the atmosphere. The Mangaroa Peatland needs to be protected to the greatest extent possible in the NRP.

3. Paras 131 and 137 refer to my submission S282.006 which requests a definition of "primary contact" in the context of primary contact sites. The S42A report proposes to define "primary contact" within the definition of "primary contact site". I am happy with that approach. The S42A revised definition for "primary contact site" is that it "*means a site identified by the Wellington Regional Council that it considers is regularly used, or would be regularly used but for existing freshwater quality, for recreational activities such as swimming, paddling, boating, or watersports, and particularly for activities where there is a high likelihood of water or water vapour being ingested or inhaled*"

There are two notable aspects to this definition. Humans are assumed and dogs are not mentioned, yet at least 12 dogs have died in the last 20 years at Te Awa Kairangi due to toxic algae. For many people their dog is loved like a family member and it is heartbreaking that a pet dog dies while having fun at the river. I don't know what to do about the ignoring of dogs. (Para 281 observes that GW has no obligation to protect dogs under the RMA or NPS-FM.)

The second aspect is that the definition makes no mention of water quality. I agree with that. The definition of a primary contact site is all about whether it is regularly used for swimming, etc. If

water quality is measured then that is great but it is not the defining significance of a primary contact site. The list of primary contact sites is for purposes beyond just knowing the water quality at key points along a river. It is a statement of an important water location (perhaps wahi tapu) that needs to be protected. For instance, river works must not destroy it.

The S42A revised definition means that the map of primary contact sites (Map 85) and companion list (Table 8.3) are incomplete about which I say more below regarding my S282.020.

4. Paras 131 and 137 also refer to my submission S282.007 which requests making the Maps searchable in the PDF. Para 131 says this issue is resolved in para 137 but there is no discussion of it. Presumably this problem still exists. If you search for "Map 85" in the current NRP PDF you find the references to Map 85 but not the actual Map 85 as the phrase "Map 85" is embedded in a non-searchable image. This is a minor matter, is easy to fix and should be fixed.

5. Para 280 refers to my submission S282.011 which seeks the addition of a "swimmable days" parameter in Table 8.3. The assessment in para 280 is that there is no scientific reason for including the "swimmable days" parameter. Indeed that was the point of my submission – the inclusion of "swimmable days" is not for scientific reasons but because it is a measure that the public relate to and can understand, whereas measures to do with e-coli or benthic cyanobacteria are difficult to understand and it is difficult to know whether there is in fact an improvement in the number of swimmable days. I ask the Hearing Panel to hear what is being requested and to include a measure of "swimmable days" (or "non-swimmable days" if that is preferred).

6. Para 281 also refers to my submission S282.011 which seeks the addition of a "benthic cyanobacteria" or "cyanobacteria blooms" parameter in Table 8.3. The main reason for health warnings posted by GW at some primary contact sites is not the presence of e-coli (which is low) but the amount of toxic algae. Greater Wellington is well aware of this problem as it has been repeatedly brought to the attention of staff and councillors that something needs to be done about it. It is included in the TWT WIP recommendations. If there is no measure then GW state of the environment reporting will be blind to its existence and seriousness. It is vital that this parameter be measured and reported on.

The S42A report suggests in para 281 that the current wording in WH.O8 (b) ("there is low risk of health effects from exposure to benthic cyanobacteria") is sufficient. If that is the case why does GW display warning signs at swimming holes? And that argument could equally apply to e-coli as the risk of its health effects is also low most of the time. Yet e-coli has a measure. Benthic cyanobacteria equally should have a measure. Benthic cyanobacteria should be included in Table 8.3.

Last year I witnessed a woman standing in the water at a swimming hole, deciding whether to let her children go into the water despite toxic algae warning signs nearby. She eventually decided to not allow her children in the water. They had to play on the hot stones and gaze wistfully at the water.

7. Para 324 refers to my submissions S282.013 and S282.014 requesting that swimmable days be included in WH.O9 and in Table 8.4. My arguments above (re para 281) apply.

8. Para 380 refers to my submission S282.020 which requests the addition of swimming hole "Whakatikei River at Hutt Confluence" to Map 85. The site fulfils the definition of "primary contact

site". On warm summer days it is frequented by many youths and picnicking families. It is an important swimming hole for the people of Upper Hutt and should be identified as such. For evidence, speak to the GW staff member, Te Awa Kairangi River Ranger.

Para 380 refers to Para 278 where a similar submission from the Pareraho Trust requested that the Speedy's Stream swimming hole be recognised as a primary contact site. Both para 278 and para 380 decline to add the sites. My commentary above on S282.006 (in the "second aspect") explains why Map 85 and Table 8.3 should include all primary contact sites whether or not there are water quality measurements occurring there.

9. Para 290 is about assigning responsibility for achieving wai ora. Here in one paragraph is the crux of the problem. Who is responsible for financing and carrying out the work? If this is not crystal clear then we will continue to get sidesteps and the year 2100 will roll by and we still won't have wai ora. The Hearing Panel and GW need to make it clear who has responsibility for achieving it.

10. Para 291 is about prioritisation of work on reducing e-coli. My submission S282.003 is not referenced in the S24A report. My submission states that I support the TAS (Target Attribute State) of achieving high quality in e-coli by 2040 rather than 2060, and note that it is enough time to get the loans, expand the workforce, and carry out the task. I acknowledge that it is a massive task to fix the pipe network and note "I seek a requirement in the NRP that water quality improvement (through pipe network repairs, etc) be staged and that the timeline be published and updated each year". As noted in my comments above on Para 106, this is a timeline through to 2100. Prioritisation of the work needs to be a key part of the timeline.

11. **Para 6** has a S42A recommendation to "*change the annual sedimentation rate targets for the Onepoto Arm and Pāuatahanui Inlet within Te Awarua-o-Porirua Harbour to discount the natural sediment rate, which has the effect of reducing the stringency of these targets*." The problem is that the Harbour is gradually silting up and sediment is the cause – whether from natural causes or man-made causes. Given the extent of the sediment deposited in the last 100+ years largely from human activity, we now need to reduce the future sediment load including reducing the natural sediment, to counter the sediment deposited. The Harbour will soon reach the state of the Tamar Estuary in Launceston, Tasmania (https://www.launceston.tas.gov.au/News-Media/TEMT-exploring-sediment-options) if serious action is not taken now.

Thank you

Pat van Berkel, 14 March 2025