

Supplementary

Submission from Auckland Council
to
Ministry for the Environment

CLEAN WATER CONSULTATION 2017

25 May 2017

Mihi

Ka mihi ake ai ki ngā maunga here kōrero,
ki ngā pari whakarongo tai,
ki ngā awa tuku kiri o ōna manawhenua,
ōna mana ā-iwi taketake mai, tauiwi atu.
Tāmaki – makau a te rau, murau a te tini, wenerau a te mano.
Kāhore tō rite i te ao.

I greet the mountains, repository of all that has been said of this place,
there I greet the cliffs that have heard the ebb and flow of the tides of time,
and the rivers that cleansed the forebears of all who came those born of this land
and the newcomers among us all.
Auckland – beloved of hundreds, famed among the multitude, envy of thousands.
You are unique in the world.

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INTRODUCTION

This submission relates to the Clean Water Consultation by the Ministry for the Environment (MfE). This document is a supplementary submission in response to two reports which were released on the 11th of May 2017; *Technical Background for 2017 MfE 'Clean Water' Swimmability Proposals for Rivers* (McBride & Soller, 2017) and *Swimming categories for E. coli in the Clean Water package: a summary of the categories and their relationship to human health risk from swimming* (MfE, 2017).

Auckland Council would like to express appreciation for the provision of these two additional reports, as they significantly clarify our understanding of the technical aspects of central government's '**Clean Water Consultation 2017**' of February 2017. It is important to note that our review of these reports has not identified any new submission points. Therefore our previous submission; *Auckland Council to Ministry for the Environment: Clean Water Consultation 2017*, dated 28th April 2017 is still applicable. In this supplementary submission, we seek to re-emphasise particular points and areas which we believe require further clarification.

CLEAN WATER CONSULTATION 2017

Comments in this supplementary submission are made in the general order that they are presented in the consultation document and align with numbering in Auckland Council's previous submission; *Auckland Council to Ministry for the Environment: Clean Water Consultation 2017*, dated 28th April 2017. This supplementary submission and Auckland Council's previous submission should be read together.

1. Ministers Target - '90% of rivers and lakes swimmable by 2040'

- g) Auckland Council supports the use of the four swimmability metrics to determine a swimmable grade and recognises that this approach offers more stringency than what is currently included in the NPS-FM (2014). However, as stated in our previous submission, clarity is still required about how to apply all four swimmability metrics in order to grade a site.

3. Amendments to the NPS-FM 2014

3.1 Swimming and recreational values

- b) Refer to 1 (g) above.
- c) The McBride and Soller (2017) report discusses the minimum acceptable state for swimming as the 'bottom of the yellow band.' It would be helpful if this was clearly articulated in the Clean Water Consultation 2017, including details of which metrics this applies to. Refer also to Section 3.1 (g) of Auckland Council's previous submission for additional details.
- f) Auckland Council does not agree with the inclusion of Appendix 5 in the NPS-FM, or as outlined in Policy CB1 (aa). The McBride & Soller (2017) and MfE (2017) reports clarify the difference between 'grading' and 'surveillance' in terms of defining swimmability. This clarification is a relevant and important distinction. The use of

long-term 'grading' to report swimmability at a regional or national level is more appropriate to include in the NPS-FM than prescriptive 'surveillance' monitoring which is designed to inform daily health risk. It is Auckland Council's view that swimming 'surveillance' and all associated monitoring, should be dealt with outside of the NPS-FM and would be best addressed through a comprehensive review of the *Microbiological Water Quality Guidelines for Marine and Freshwater Recreational Areas* (MfE/MoH, 2003).

- g) Clarification is needed regarding the monitoring required to 'grade' a site using the four metrics proposed in the Clean Water Consultation 2017. This includes the length of data, and frequency and timing of sampling. Auckland Council agree with the McBride & Soller (2017) view that the use of 'up to 10 years' of data would make the demonstration of water quality improvement difficult if all four metrics are used. Auckland Council instead supports the use of a shorter data period, such as 60 data points, for the 'grading' of bathing sites in the NPS-FM.

Auckland Council supports the collection of water samples for the purpose of 'grading' to be undertaken irrespective of weather conditions. This will ensure that a more accurate and 'representative' long-term assessment of swimmability can be articulated.

COMPARISONS TO EXISTING SWIMMING CATEGORIES

The McBride & Soller (2017) and MfE (2017) reports both provided useful comparisons of a range of *E. coli* categories for swimming in New Zealand and internationally. These included; the swimming categories in the current NPS-FM, the Clean Water Consultation 2017, the *Microbiological Water Quality Guidelines for Marine and Freshwater Recreational Areas* (MfE/MoH, 2003), the EU and USEPA. This analysis has improved our understanding of the 'stringency' of the proposed Clean Water Consultation 2017 categories. The analysis has also provided a number of 'visual aids' which will support our communication of this information to our stakeholders, community and elected members.

REFERENCES

McBride, G. and Soller, J. 2017. *Technical Background for 2017 MfE 'Clean Water' Swimmability Proposals for Rivers*. NIWA Report FWWQ1722, May 2017. 36p.

Ministry for the Environment, 2017. *Swimming categories for E. coli in the Clean Water package: A summary of the categories and their relationship to human health risk from swimming*. Wellington: Ministry for the Environment. 20p.

MfE/MoH 2003. *Microbiological Water Quality Guidelines for Marine and Freshwater Recreational Areas*. Ministry for the Environment. 159p.