

Submission on Resource Management (Freshwater and Other Matters) Amendment Bill

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About Stet Limited

1. Stet is a limited liability company formed in 2011 by Shaun Lee. The term 'stet' comes from the publishing industry and means undo changes. Stet is a social enterprise that supports restoration and conservation projects in New Zealand.
2. Stet Limited strongly oppose the Bill.

Stet Limited submits our strong opposition to the Resource Management (Freshwater and Other Matters) Amendment Bill. We believe this Bill represents a significant step backward at a critical time when the improvement of freshwater quality is of paramount importance. The Bill should be rejected in its entirety, as it undermines essential protections for freshwater ecosystems and threatens public health.

Fundamental Concerns

This Bill is fundamentally flawed as it jeopardises the progress made in safeguarding our freshwater resources. Freshwater ecosystems are already under immense stress, and this Bill's provisions risk further degradation. It is essential to maintain the current hierarchy of obligations, which prioritises the health of freshwater and communities over commercial water use.

As an individual who frequently engages in activities such as scuba diving, I have witnessed the adverse effects of poor water quality in lakes and rivers. Our lakes are dying, many are unrestorable. 46% of all our lakes larger than 1 hectare have poor or very poor health. About 76 per cent of indigenous freshwater fish species, that's 39 out of 54, are threatened with extinction or at risk of becoming threatened. Additionally, my work with shorebirds and shellfish has shown me the downstream impacts of degraded freshwater ecosystems on these species. 82 percent of shorebirds (14 of 17 species) are threatened with extinction or at risk of becoming threatened. Un-swimmable rivers and estuaries are not only a public health concern but also a reflection of our failing environmental stewardship.



Native stonewort Characeae surviving in a degraded lake. Photo Shaun Lee.

Hierarchy of Obligations

Meddling with the hierarchy of obligations could cause confusion and increase costs for consentees, undermining community confidence in the protection of our fresh drinking water. The health of freshwater ecosystems and access to safe drinking water should always be prioritised over commercial interests. This principle is crucial for ensuring the sustainability of our water resources for future generations.

Evidence and Impact

The Ministry for the Environment's Regulatory Impact Statement (RIS) indicates that there is limited evidence suggesting the current hierarchy of obligations negatively impacts consent applications. This suggests that the proposed changes in the Bill address a non-existent problem. The Bill appears to be a solution in search of a problem, rather than a measured response to actual issues affecting freshwater management.

Specific Concerns

We are particularly concerned about the proposal to roll back intensive winter grazing regulations. This practice, widely criticised for its environmental and animal welfare impacts, can lead to significant sediment run-off, polluting waterways and harming aquatic life. The Government has not

provided sufficient evidence to demonstrate that intensive winter grazing practices have improved to justify the proposed regulatory rollbacks.



Oysters struggling to filter water in a degraded estuary. Photo Shaun Lee.

Conclusion

In summary, Stet Limited urges Parliament to reject the Resource Management (Freshwater and Other Matters) Amendment Bill. Maintaining robust protections for freshwater is essential for preserving the health of our ecosystems and ensuring safe drinking water for all communities. We must prioritise the long-term sustainability of our natural resources over short-term commercial interests.

Thank you for considering our submission.