

ENVIRONMENT CANTERBURY

Submission on
Proposed National Policy Statement on
Freshwater Management

INTEGRATED APPROACH

- Environment Canterbury recommends that the PNPS be amended to:
 - Provide express recognition of the complex and interconnected nature of freshwater resources and
 - Provide a clear requirement to adopt an integrated management approach to all levels of decision making.

CUMULATIVE EFFECTS

- Environment Canterbury recommends that the PNPS be amended to include a policy provision that draws attention to the need to avoid the occurrence of cumulative effects on freshwater resources.
- Environment Canterbury notes the difficulties in identifying and measuring cumulative effects and recommends that central government provides tools or guidance notes to guide and assist local councils in addressing this issue.

MANAGING SCIENTIFIC UNCERTAINTY

- Environment Canterbury recommends that the PNPS provides guidance to local authorities when making decisions in the face of uncertainty, i.e. to apply a precautionary/adaptive management approach.

MANAGING OVER-ALLOCATION OF WATER

- Environment Canterbury recommends that the PNPS provides:
 - an overall objective to avoid over allocation and
 - policy direction to address over allocation of freshwater resources, including reference to section 128 reviews.
- Environment Canterbury draws the Board's attention to the need for tools and mechanisms for councils to more responsively address over allocation as a matter of priority. These approaches may not necessarily be able to be developed through the NPS.

INFRASTRUCTURE DEVELOPMENT

- Environment Canterbury considers that the PNPS should be amended to include policy requiring local authorities to consider infrastructure planning and development in the context of freshwater management.

IDENTIFICATION OF KEY WATER QUALITY VALUES

- Environment Canterbury considers that the PNPS should:
 - Identify national values for freshwater resources in the NPS;
 - Require regional councils to apply those national values in the regional context when identifying outstanding, at risk and degraded freshwater resources;
 - Provide for the ability to recognise the importance of regional valued resources; and
 - Stipulate that the regional councils are required to undertake this work within timeframes set by the regional councils (through amending Policy 1 (a) to include this requirement).

MANAGING “AT-RISK” CATCHMENTS

- Environment Canterbury considers that the PNPS should be amended to:
 - identify the management of at-risk catchments as a priority;
 - specify criteria for determining at risk catchments;
 - include the criteria in regional policy statements without further formality; and
 - include a policy that gives regional councils tools to manage those at risk catchments identified.

FURTHER SUBMISSIONS MADE

- Environment Canterbury draws the Board's attention to the further submissions made by Environment Canterbury in support of particular aspects of original submissions made by Solid Energy, the Wellington City Council, New Zealand Freshwater Sciences Society, Rotorua District Council, Christchurch City Council, Te Runanga o Ngai Tahu and Simon Berry Environmental Law.

CONCLUSIONS

- Environment Canterbury would like to thank the Board once more for the opportunity to provide feedback on the PNPS. We do hope that the Board finds our suggestions helpful in the final preparation of a National Policy Statement for Freshwater Management.