

**Further submission in support of, or in opposition to,
submission on the publicly notified proposed national policy
statement on Freshwater Management**

To: The Chairperson
Board of Inquiry

Name of submitter: **Environmental Defence Society Incorporated (EDS)**

This is a further submission in opposition to a submission on the proposed national policy statement for freshwater management (the proposal).

EDS opposes the submission of Dairy New Zealand, at House 61, PO Box 160, Lincoln University 7647, Canterbury, submission number 106.

The particular parts of the submission that EDS oppose are:

- The proposed amendments to objective 1 and associated policy.
- The proposed amendments to objective 3 and 5.
- Amending objective 6 to reflect priority of ensuring supply for nationally significant economic activities.
- The proposed amendments to objective 7.

The reasons for EDS's opposition are:

New Zealand's freshwater resources are in a very poor state. Robust goals are required to ensure that urgent action is taken. EDS has detailed its amendments to the NPS in its primary submission. These include a number of amendments which seek to provide focus, certainty, appropriate timelines, and a precautionary approach to the NPS. The above amendments proposed by Dairy New Zealand will undermine EDS's primary submission.

EDS seeks that the parts of the submission referred to above be disallowed.

EDS wishes to be heard in support of this submission.

If others make a similar submission, we will consider presenting a joint case with them at a hearing.



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Shay Schlaepfer
Solicitor
Environmental Defence Society Inc

14 April 2009

Address for service of submitter:

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To: The Chairperson
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Name of submitter: **Environmental Defence Society Incorporated (EDS)**

This is a further submission in opposition to a submission on the proposed national policy statement for freshwater management (the proposal).

EDS opposes the submission of Federated Farmers of NZ Inc of Level 6, 154 Featherston Street, PO Box 715, Wellington 6140, submission number 88.

The particular parts of the submission that EDS oppose are:

- Extending the timeframes for any actions on water quality.
- Extending the timeframe for regional plans to be amended in line with the review timeframes under the RMA.
- New objective to recognise the economic importance of freshwater and address its use in an economic context.
- All amendments that focus on the effects of land use activities rather than land use itself.
- Amending objective 1 to restate section 5 RMA and deleting "potential values" from objective 1(b).
- Amending objective 2 to refer to land use activities rather than development.
- Rewording objective 9 to refer to cost-effective monitoring and reporting that reflects an appropriate level of public benefit.
- All amendments that exclude an RPS or a district plan from the Schedule 1 process when they already comply with the NPS and/or the RPS.
- Amending policy 1 to narrow the effect of the policy to only relate to water bodies affected by discharges.
- Amending policy 6 to delete the requirement of protection against degradation of water resources.
- Deleting the definition of Notable Values and any references to it.

The reasons for EDS's opposition are:

New Zealand's freshwater resources are in a very poor state. Robust goals are required to ensure that urgent action is taken. EDS has detailed its amendments to the NPS in its primary submission. These include a number of amendments which seek to provide focus, certainty, appropriate timelines, and a precautionary approach to the NPS. The above amendments proposed by Federated Farmers will undermine EDS's primary submission.

EDS seeks that the parts of the submission referred to above be disallowed.

EDS wishes to be heard in support of this submission.

If others make a similar submission, we will consider presenting a joint case with them at a hearing.



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Name of submitter: **Environmental Defence Society Incorporated (EDS)**

This is a further submission in opposition to a submission on the proposed national policy statement for freshwater management (the proposal).

EDS opposes the submission of Fonterra Cooperative Group Limited, PO Box 471, Wellington 6140, submission number 113.

The particular parts of the submission that EDS oppose are:

- Removal of land-use development from the NPS.
- Amending the timeframe for a regional council to notify a RPS so that it aligns with the next planning cycle of RPS development that would normally have occurred.
- Amending policy 2 and 3 to allow for instances where the community agrees water quality standards may be lower than current water quality levels.
- Amendments to policy 5 to require territorial authorities to also consider ongoing social and economic costs and benefits rather than just transitional costs.

The reasons for EDS's opposition are:

New Zealand's freshwater resources are in a very poor state. Robust goals are required to ensure that urgent action is taken. EDS has detailed its amendments to the NPS in its primary submission. These include a number of amendments which seek to provide focus, certainty, appropriate timelines, and a precautionary approach to the NPS. The above amendments proposed by Fonterra Cooperative Group Limited will undermine EDS's primary submission.

EDS seeks that the parts of the submission referred to above be disallowed.

EDS wishes to be heard in support of this submission.

If others make a similar submission, we will consider presenting a joint case with them at a hearing.



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