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Submission on the Proposal for  
National Policy Statement for  
Freshwater Management – Section 49  
of the Resource Management Act  
1991.

Community and Public Health  
Canterbury District Health Board  
January 2009

Submission on the Proposal for National Policy Statement for Freshwater Management – Section 49 of the  
Resource Management Act 1991.- Community and Public Health, Canterbury District Health Board,  
January 2009

To: the Chairperson  
Board of Inquiry

### **Introduction**

Thank you for the opportunity to comment on the Proposed National Policy Statement for Freshwater Management (NPS). We support the action to strengthen policy and direction for the abstraction of New Zealand's Freshwater resources and efforts to improve on current practices.

Community and Public Health (CPH) work to promote the reduction of adverse environmental effects on the health of people and communities and work to improve promote and protect their health pursuant to the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.

These statutory obligations are the responsibility of the Ministry of Health and in the West Coast, Canterbury and South Canterbury Health Districts are carried out under contract by CPH, on behalf of the Canterbury District Health Board.

This submission comments on a number of general issues regarding the NPS and provides specific feedback particularly related to all objectives.

### **General Comment**

Community and Public Health are supportive of the purpose of the Proposed NPS "to state inter-related and integrated objectives and policies as to the management of Freshwater Resources as a matter of national significance that is relevant to achieving the purpose of the Act". We also agree with the proposals statement "... that there is a particular need for clear central government policy that directs local government to

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implement measures necessary to achieve the following goals ...” (as identified in the NPS). There are clearly a number of problems associated with the current system for the allocation of freshwater resource identified in the section 32 evaluation document. The proposal highlights the need for a greater direction and guidance to be put in place to start addressing the present issues.

The environment has a big influence on the life of New Zealanders<sup>i</sup>. Their way of life is shaped around action and interaction with the environment. The outdoor lifestyle and farming heritage are important elements of the national identity. The New Zealand environment includes not only iconic wilderness and rural areas but also the urban environments where 86 percent of the population of New Zealand lives. The New Zealand environment is also integral to the economy with land and sea based primary production and tourism sectors contributing about 17 percent of the gross domestic product.

In recent years, major sources of environmental pressure like agriculture, transport, tourism, and energy production and consumption have expanded in New Zealand<sup>ii</sup>.

Water quality is a key environmental issue. Safe drinking water should be available to everyone and is a fundamental public health requirement.<sup>iii</sup> Over 15% of the population of New Zealand is supplied with drinking water that does not meet national drinking water standards.<sup>iv</sup>

New Zealand has a high rate of waterborne diseases compared with similar countries (see table below). People in small rural communities compared to urban areas would be less likely to have access to safe water supplies. Similarly highly deprived areas tend to have unsafe water supplies with Maori being over represented in these communities. Monitoring of water supplies in low income and isolated rural communities to ensure safe water supply is mostly inadequate. Based on currently available data, two separate Submission on the Proposal for National Policy Statement for Freshwater Management – Section 49 of the Resource Management Act 1991.- Community and Public Health, Canterbury District Health Board, January 2009

estimates of the burden of endemic drinking-waterborne gastro-intestinal disease are *ca.* 18,000 and 34,000 cases per annum.<sup>v</sup> Preliminary results from work in progress suggest that these are underestimates.

### **Comparison of campylobacteriosis incidence between countries<sup>vi</sup>**

<b>Country</b>	<b>Period</b>	<b>Rate /100,000</b>
New Zealand	12 months to December 2001	279.8
USA	2000	20.1
Canada	1986-1998	39-54
Australia*	2000	107
England and Wales	1998	111

Water quality in rivers and lakes in New Zealand has declined in regions that are dominated by pastoral farming leading to high nutrient input and microbiological contamination. This has caused destabilisation of natural ecosystems and poses a risk to health. In lowland areas, surface waters have regularly exceeded national water quality guidelines and there has been consequent damage to aquatic ecosystems due to run-off and leaching from pastoral farming and rural septic tanks<sup>vii</sup>. As with unsafe drinking water, it is the small rural communities, which are more likely to experience contamination of water supplies from failed or inadequate sewage disposal systems. Contamination of aquatic food gathering areas like shellfish beds can lead to outbreaks of hepatitis A, Norwalk –like virus and other diseases<sup>viii</sup>.

## **Submission**

This unit makes the following comments to the proposal for your consideration:

### **General**

The document would benefit public health by increasing the reference to health throughout the document. As environmental health and public health are inextricably linked this document has the potential to have a positive impact on (human) population health. Therefore public health should be recognised as a positive consequence and stated as such in the document.

### **Decision requested:**

Add to the Preamble: “the effective management of the Freshwater environment has the potential to positively impact the health of the New Zealand population”.

### **Objective 1 – Enabling well-being of people and communities**

The Evaluation document identifies in s 2.2.2 that there are concerns with the linkage between land use planning and freshwater management. This unit has similar concerns particularly where freshwater is abstracted as part of the consent or planning process with no consideration of the intended use i.e. hydroelectric generation, irrigation, drinking water etc. It is considered that objective 1 will go some way towards addressing this concern.

The reference to health in Objective 1 should be strengthened to assist clarity on the integrated nature of human health and the environment we live in.

**Decision requested:**

Community and Public Health ask that Objective 1 is amended to include: "...and cultural well-being, ensuring a healthy and safe population both now and into the future."

It is considered that further structure and direction to the objectives and policies of this National Policy Statement (NPS) would be required. Complementary National Environmental Standards (NES) may also be required to provide guidance in the form of minimum baselines for water quality and a consistent nationwide approach particularly with monitoring and evaluation.

**Objective 2 – Ensuring integrated management of effect on fresh water**

This unit supports this objective.

**Objective 3 – Improving the quality of fresh water**

The use of fresh water has purposes beyond recreational use and includes water used for food gathering, food manufacture and drinking water purposes. The scope of this section could benefit by including this broader approach to the purpose of improving the fresh water quality beyond the "swimmable standard" reference.

**Decision requested:**

Community and Public Health ask that objective 3 is amended to include the following:

"...Freshwater Resources can reach or exceed a standard that allows for safe recreational water contact and food gathering."

#### **Objective 4 – Recognising and protecting life supporting capacity and ecological values**

This objective appears to marry with objective 5 (addressing fresh water degradation) and also the National Environmental Standard for Sources of Human Drinking Water. We support steps that are taken that improve and enhance fresh water supplies.

#### **Objective 5 – Addressing freshwater degradation**

In this section the policy discusses the sustainable management of demands on fresh water as it relates to its availability and adverse effects both individually and cumulatively. The assessment of cumulative effects within the scope of the RMA has been of concern to this unit. When significant volumes of water are allocated to users it may impact upon recharge zones from ground water abstraction potentially introducing contaminants into the water due to hydraulic gradient. Large volumes abstracted from surface water catchment places pressure on the water body to supply the needs of down stream users during periods of low flow.

These issues may not always be well covered under existing legal and policy structures. Water allocation needs to be provided in an informed, fair and reasonable manner and this NPS provides a platform from which to do so.

#### **Decision requested:**

Community and Public Health ask that objective 5 is strengthened to highlight the need for water to be allocated in an informed, fair and reasonable manner.

## **Objective 6 – Managing demand for fresh water**

One of the predictions of the biophysical impacts of climate change on New Zealand is that both frequency and magnitude of extreme events, such as droughts and floods, will increase. Case studies of past droughts, such as the 1997/98 El-Niño event, provide examples of the impact of climate extremes and allow the development of long-term adaptation mechanisms if such extreme events were to become more frequent<sup>ix</sup>.

Such events place enormous pressure on the demand for water resources. Auckland experienced a “water crisis” during the El-Niño event due to high demand and low flow. The Canterbury Plains Water Scheme and project “Aqua” in Otago are both high profile examples of the need for clarity on managing the demand on fresh water.

### **Decision requested:**

Community and Public Health ask that objective 6 include particular consideration of the impact of extreme weather events on the allocation of fresh water.

## **Objective 7 – Efficient use of fresh water**

This section identifies the importance of avoiding wastage of fresh water resources. This unit is supportive of sensible water conservation measures.

It further discusses the need to avoid excessive contamination. It is unclear what is meant by “excessive contamination”. This unit would be concerned with the inclusion of a policy statement such as this as it implies that some contamination events are acceptable.

### **Decision requested:**

Community and Public Health ask that objective 7 is amended to remove objective 7 (b) from the Proposed National Policy Statement.

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### **Objective 8 – Iwi and hapu roles and Tangata Whenua Values and Interests**

Community and Public Health supports this objective.

### **Objective 9 – Ensuring effective monitoring and reporting**

For the implementation of the policy and plan to be effective, process and outcome monitoring must be undertaken. It is recommended that when reporting on the outcomes, the regulatory authority concerned takes steps to ensure that the accurate interpretation of the data is undertaken. Consideration should be given to ensure that the ability of the Regional Council or Territorial Local Authorities to undertake the monitoring is not impeded by the reporting process. This would need to be balanced against using the information collected to inform the planning process and strategic direction for the area of concern.

**Conclusion**

Community and Public Health is supportive of the statements relating to the improved management, control and monitoring of the fresh water resource in New Zealand.

We do not wish to be heard in support of our submission.

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Signature of submitter

(or signature of person authorised to sign)

21 January 2009.....

Date

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## References

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- <sup>i</sup> MFE 2007. *Environment New Zealand 2007*. Ministry of the Environment, Wellington, New Zealand.
- <sup>ii</sup> OECD 2007. *OECD Environmental performance review of New Zealand*. Organisation for Economic Co-operation and Development, Paris, France.
- <sup>iii</sup> HRC 2007. *HRC Research Portfolio Strategy: Determinants of Health*. Health Research Council, Auckland, New Zealand.
- <sup>iv</sup> OECD 2007. *OECD Environmental performance review of New Zealand*. Organisation for Economic Co-operation and Development, Paris, France.
- <sup>v</sup> Estimation of the Burden of Waterborne Disease in New Zealand – Preliminary report; Published by the Ministry of Health, February 2007.
- <sup>vi</sup> Baker M, et al. 2002. *Potential Transmission Routes of Campylobacter from Environment to Humans*. ESR Client Report FW0246. Prepared as part of a Ministry of Health contract for scientific services.
- <sup>vii</sup> MFE Aug 2007, Lake Water Quality in New Zealand: Status in 2006 and recent trends 1990–2006 Ministry of the Environment, Wellington, New Zealand.
- <sup>viii</sup> Hewitt J, Greening GE. Survival and persistence of norovirus, hepatitis A virus and feline calicivirus in marinated mussels. *J Food Protection* 2004; 67: 1743-50.
- <sup>ix</sup> MFE, June 2001, Ref. ME396, climate change impacts on new Zealand, Ministry of the Environment, Wellington, New Zealand.