

TARANAKI / WHANGANUI CONSERVATION BOARD
TE TAI HAU-Ä-URU

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Administration Officer – Board of Inquiry – Water
c/- Ministry for the Environment
P.O. Box 10362
Wellington 6143

30 January 2009

Dear Sefulu,

**RE: REQUEST FOR EXTENSION - SUBMISSION ON PROPOSED NATIONAL
POLICY STATEMENT FOR FRESHWATER MANAGEMENT**

As per e-mail correspondence of 28 January 2009 with Louise Davies, clarification was sought on the possibility of requesting an extension for submissions to the Proposed National Policy Statement for Freshwater Management given that submissions closed on Friday, 23 January 2009.

Please be advised that the Taranaki/Whanganui Conservation Board had fully intended to lodge a submission having passed a resolution to do so at their meeting on 17 October 2008. It is regrettable that the board member leading the submission had commenced a draft submission however extenuating circumstances have meant that the timeframe was not able to be met.

On behalf of the Taranaki/Whanganui Conservation Board, I therefore request that the Board of Inquiry consider the Board's late submission under section 37 of the Resource Management Act 1991.

Yours faithfully



Darryn Ratana
Chairman
Taranaki/Whanganui Conservation Board

DOC DM 393924

THE UNIVERSITY OF CHICAGO
DEPARTMENT OF POLITICAL SCIENCE
POLITICAL SCIENCE 301
LECTURE NOTES
BY [Name]

1. Introduction to the course
2. The structure of the state
3. The role of the state in development

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29 January 2009

Administration Officer- Board of Inquiry-Water
c/o Ministry for the Environment
PO Box 10362
WELLINGTON 6143

Taranaki-Whanganui Conservation Board/Te Tai Hau-A-Uru Submission on Proposed National Policy Statement for Freshwater Management

1. Introduction

The Taranaki/Whanganui Conservation Board/Te Tai Hau-A-Uru (the Board) covers a large area in the lower North Island stretch from the Mokau River in the north to the Manawatu River at the southern end of the conservancy. Several major river catchments are located in the Conservancy including the Mokau, Tongaporutu, Waitara, Mohakatino, Patea, Waitotara, Whangaehu, Turakina, Rangitikei, Oroua, and of course the Whanganui awa. In addition, there is multitude of smaller rivers, streams (in particular those that rise on Taranaki Maunga), estuarine areas and wetlands.

In recent years the Board has received many presentations on aspects of water quality and the state of flora and fauna found in freshwater environments, particularly eels and whitebait. The Board has been active in making submissions to Taranaki Regional Council and Horizons Regional Council as part of its advocacy of conservation values in relation to freshwater management.

2. General Comments

The Board considers that a National Policy Statement for Freshwater Management is urgently needed in order to provide clear leadership and set standards to protect freshwater ecosystems and limit (and hopefully reverse) degradation of water quality. In addition, there is a need to address tangata whenua values and interests in the management of freshwater.

The Board is particularly concerned at the loss of suitable habitat throughout the Conservancy and supports initiatives to improve freshwater habitats. The Board seeks active measures to protect and enhance native vegetative cover in river catchments to prevent sediment loss. Within the Conservancy, very little wetland habitat remains and the lack of riparian protection in this area severely impacts on

the aquatic habitat that is left. In the Taranaki, Wanganui and Manawatu regions recent escalating conversion of land to dairying is having a profound effect on water quality and quantity. This land-use development is not being proactively and sustainably managed by regional councils and territorial authorities.

The Board would like to highlight the need for a coordinated management approach by land management agencies to advocate for and assist with the protection of forested areas and waterways on private land.

The Board is gravely concerned about the likely introduction of didymo.

3. Further Comments re Objectives and Policies.

The Board supports the nine objectives of the Proposed Freshwater Management NPS. However, the Board would like to see stronger guidance as to the allocation of freshwater resources, recognition of the impact of cumulative effects, and better acknowledgement of tangata whenua perspectives and values. In addition, more clear guidance is needed about the mechanisms by which "effective integrated management" will be achieved.

In addition, the Board is concerned that Objective 6 Managing demand for freshwater does not give a sufficient mandate to regional councils to manage allocations in over-allocated catchments and does not give sufficient weight to conservation values in allocation management. The Board considers that regional councils should be required to ensure that freshwater quality standards and environmental flows and levels are not breached.

It is to be hoped that the Proposed Freshwater Management NPS will ensure that no further catchments become 'at risk'. However, the Board considers that an additional objective should be included to ensure that already existing 'at risk' catchments are identified and managed by regional councils.

As in our submission on the Proposed National Coastal Policy Statement, the Board strongly supports a Precautionary approach, especially where there is uncertainty about the effects of activities on freshwater resources.

The Board seeks stronger measures for identification and protection of outstanding freshwater resources and protection of the values associated with those resources.

Population and household growth is placing pressure on freshwater resources and the Board considers that much greater emphasis should be placed on conservation and reduction in consumption through appropriate economic instruments and public awareness raising nationally rather than through local discretion. More efficient use of water can reduce pressures on quality and quantity.

The Board strongly supports Objective 8 (Iwi and hapū roles and tangata whenua values and interests) and Objective 9 (Ensuring effective monitoring and reporting). With regard to Objective 8 it is important to ensure that there are suitable forums in place to ensure tangata whenua values and interests are reflected in decision-making and management. One example in our area is the Te Tai Hau-a-uru Freshwater Forum established in early 2008 which is seeking improved management of freshwater species such as eel.

The Board supports the 9 Policies.

Finally, the Board has made submissions on the Proposed NZ Coastal Policy Statement and the Proposed NPS on Renewable Electricity Generation highlighting the need for a greater weighting for conservation values recognising the long-term economic, social and environmental benefits of enhanced indigenous biodiversity. The same applies to Freshwater management. The Board is concerned that in recent uses of call-in processes, conservation concerns become submerged and overlooked in whole-of-government submissions on major projects. Greater clarity about the criteria that apply to use of call-in processes is needed as well as more consideration of long-term conservation benefits.

There is a need for consistency between and greater alignment of these different NPSs. As with the first National Coastal Policy Statement, there should be an independent review ten years after the publication of a Freshwater Management NPS.

Yours sincerely



Darryn Ratana
Chairperson
Taranaki-Whanganui Conservation Board

Date: 29 January 2009

Contact person:

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