

**Further submission in support of submissions on the proposed National Policy Statement for Freshwater Management**

To: The Chairperson  
Board of Enquiry - Water  
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Name of Submitter: **Ballance Agri-Nutrients Limited**  
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This is a further submission by Ballance Agri-Nutrients Limited (Ballance) in support of the following six submissions on the proposed National Policy Statement for Freshwater Management (proposed NPS).

Overall Ballance believes the proposed NPS is fraught with substantial uncertainty, a theme consistent within all submissions received. Ballance believes there is a need to develop a further version of the proposed NPS, which is publicly notified again for submissions.

Ballance seeks 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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Signature of person making further submission  
**Nigel Sadlier**  
Group Environmental Manager

**14 April 2009**

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Date

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## Ballance Agri-Nutrients: Further Submissions

| Submission Number | Submitter Name                      | Submitter Position | Proposed NPS Section | Reason and Relief Sought  | Ballance Further Submission | Ballance Reason   |
|-------------------|-------------------------------------|--------------------|----------------------|---|-----------------------------|---|
| 10                | Environment Bay of Plenty           | Support In Part    | Objective 2          | The term "land use development" is future oriented.<br><br>RELIEF SOUGHT<br>Redraft objective to reflect the fact that many freshwater management issues date from past and existing practices.   | <b>Support</b>              | The proposed NPS is fraught with substantial uncertainty, a theme consistent within all submissions received.<br><br>Ballance seeks that the whole of the relief sought be allowed and that the proposed NPS is redrafted and notified again for submissions.   |
| 10                | Environment Bay of Plenty           | Support In Part    | Policy 2             | Policy 2(c)(ii) does not make sense.<br><br>RELIEF SOUGHT<br>Redraft Policy 2(c)(ii).   | <b>Support</b>              | The proposed NPS is fraught with substantial uncertainty, a theme consistent within all submissions received.<br><br>Ballance seeks that the whole of the relief sought be allowed and that the proposed NPS is redrafted and notified again for submissions.   |
| 15                | South Waikato District Council      | Support In Part    | Policy 2             | RELIEF SOUGHT<br>The term "industry good practice" should be defined, and identify how it is to be applied to specific industries and land uses. Central government should provide alternative approaches where industry good practice is not effective.  | <b>Support</b>              | The proposed NPS contains inadequate definitions for national policy.<br><br>Ballance seeks that the whole of the relief sought be allowed and that the proposed NPS is redrafted and notified again for submissions.   |
| 63                | Greater Wellington Regional Council | Oppose             | Policy 1             | The term "notable" is not one that is normally used in a RMA context and the definition provided is vague.<br><br>Support an approach that identifies the purpose that water bodies are to be managed for. Such an approach would apply all the information that local authorities have about the values and uses of any particular water body. This would be consistent with the approach indicated in the Third Schedule of the RMA for managing water bodies.<br><br>RELIEF SOUGHT<br>Recommend deleting reference in the NPS to "notable values" of freshwater resources and substitute with a policy that requires water bodies to be managed for identified purposes. | <b>Support</b>              | Consistent with Ballance submission that freshwater quality standards (or guidelines) should be applied (consistently) relative to the classification of the freshwater resource in question.<br><br>Classifications should not be inconsistent with Schedule 3 of the RMA.<br><br>Ballance seeks that the whole of the relief sought be allowed and that the proposed NPS is redrafted and notified again for submissions. |
| 78                | Irrigation New Zealand Inc          | Support In Part    | Policy 2             | Timeframes in Policy 2(b) for plan changes are unrealistic. Under Policy 2(c)(i) there is a need for industry good practice to be defined and clear.<br><br>RELIEF SOUGHT<br>Define 'industry good practice'.   | <b>Support</b>              | The proposed NPS contains inadequate definitions for national policy.<br><br>Ballance seeks that the whole of the relief sought be allowed and that the proposed NPS is redrafted and notified again for submissions.   |

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| 113 | Fonterra Cooperative Group Limited | Support In Part | Whole Document | <p>The proposed NPS contains little that recognises the strategic role of central government in freshwater management.</p> <p>RELIEF SOUGHT</p> <ul style="list-style-type: none"> <li>- The Board of Inquiry, having considered the first round of submissions, develop a further version of the Proposed NPS and allow for further submissions being made on this revised NPS.</li> <li>- Consideration must be given to the value in central government making decisions on the appropriate management objectives for those waterways determined to be of national significance, whether for environmental, economic or cultural reasons.</li> </ul>   | <b>Support</b> | <p>The proposed NPS is fraught with substantial uncertainty, a theme consistent within all submissions received.</p> <p>Ballance seeks that the whole of the relief sought be allowed and that the proposed NPS is redrafted and notified again for submissions.</p>   |
| 113 | Fonterra Cooperative Group Limited | Support In Part | Objective 2    | <p>RELIEF SOUGHT</p> <p>Clarification as to what is meant in practice by "ensuring effective integrated management".</p>  | <b>Support</b> | <p>The proposed NPS is fraught with substantial uncertainty, a theme consistent within all submissions received.</p> <p>Ballance seeks that the whole of the relief sought be allowed and that the proposed NPS is redrafted and notified again for submissions.</p>   |
| 113 | Fonterra Cooperative Group Limited | Support In Part | Objective 3    | <p>Given the potential impacts of Objective 3, that this issue requires considerable discussion and assessment before the required criteria could be finalised.</p> <p>RELIEF SOUGHT</p> <p>Objective 3 explicitly recognises that there are freshwater resources where a swimmable (or greater) water quality standard is "appropriate", and by implication recognises that there are water resources where, for reasons of need, practicality or the balancing of other desired outcomes, reaching such a standard is not "appropriate". Direction is required as to the criteria local government should apply in determining whether this water quality standard is appropriate to a specific water resource.</p>               | <b>Support</b> | <p>The proposed NPS lacks substantial guidance and definition, with particular regard to water quality classification. Consistent national direction is required with regard to the setting of freshwater quality standards (or guidelines) relative to the classification of the freshwater resource.</p> <p>Ballance seeks that the whole of the relief sought be allowed and that the proposed NPS is redrafted and notified again for submissions.</p> |
| 113 | Fonterra Cooperative Group Limited | Support In Part | Policy 3       | <p>Question the practicality of the timetables for action by territorial authorities contained within Policy 3(a).</p> <p>RELIEF SOUGHT</p> <ul style="list-style-type: none"> <li>- Policy 3(a) be amended to direct territorial authorities to notify a proposed district plan, change or variation in line with the next cycle of district plan review, change or variation that would normally have occurred.</li> <li>- Amend Policy 3(b)(i) to: "Protection against degradation of the quality of freshwater of Freshwater Resources below agreed water quality standards."</li> <li>- Amend Policy 3(b)(iii) to reflect the need to manage the effects of land use activities rather than "land use development".</li> </ul> | <b>Support</b> | <p>The proposed NPS is fraught with substantial uncertainty, a theme consistent within all submissions received.</p> <p>Ballance seeks that the whole of the relief sought be allowed and that the proposed NPS is redrafted and notified again for submissions.</p>   |

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| 113 | Fonterra Cooperative Group Limited | Support In Part | Policy 4       | <p>By considering only the transitional costs any long term costs are discounted and the true costs (and benefits) not properly recognised. Do not support "swimmability" as being an appropriate base line water quality objective for all water resources.</p> <p>RELIEF SOUGHT<br/>Amend Policy 4 to require regional councils to consider the following matters in addition to those outlined in Policy 4:<br/>- Ongoing social and economic costs (and benefits) rather than just transitional costs (Policy 4(g)), and<br/>- Appropriate water quality outcomes for those water resources that will be regulated, rather than simply the value of swimmability to the community (Policy 4(h)).<br/>Amend Policy 4(b) to reflect the need to manage the effects of land use activities rather than "land use development".</p> | <b>Support</b> | <p>Consistent with Ballance submission. General theme in submissions received indicates insufficient undertaking of costs benefit analysis.</p> <p>Ballance seeks that the whole of the relief sought be allowed and that the proposed NPS is redrafted and notified again for submissions.</p>  |
| 118 | Horticulture New Zealand           | Support In Part | Whole Document | <p>The definition of "freshwater quality standard" is short on detail and will not promote national consistency in the management, measurement and reporting of objectives for freshwater management.</p> <p>RELIEF SOUGHT<br/>The proposed NPS provide national direction on the setting of freshwater quality standards and the measurement and monitoring of water quality standards.</p>  | <b>Support</b> | <p>Consistent national direction is required with regard to the setting of freshwater quality standards (or guidelines) [relative to the classification of the freshwater resource].</p> <p>Ballance seeks that the whole of the relief sought be allowed and that the proposed NPS is redrafted and notified again for submissions.</p> |
| 118 | Horticulture New Zealand           | Support In Part | Policy 1       | <p>Policy 1 generally contains timeframes that are unrealistic for implementation of the proposed actions by local and regional government.</p> <p>RELIEF SOUGHT<br/>Conduct a wide scale rewrite of Policy 1.</p>  | <b>Support</b> | <p>The proposed NPS contains unrealistic requirements of local authorities.</p> <p>Ballance seeks that the whole of the relief sought be allowed and that the proposed NPS is redrafted and notified again for submissions.</p>  |
| 118 | Horticulture New Zealand           | Support In Part | Policy 6       | <p>Do not support Policy 6. It is considered vague and confusing giving the guidance in Policies 1-3.</p> <p>RELIEF SOUGHT<br/>Delete Policy 6.</p>   | <b>Support</b> | <p>The proposed NPS is fraught with substantial uncertainty, a theme consistent within all submissions received.</p> <p>Ballance seeks that the whole of the relief sought be allowed and that the proposed NPS is redrafted and notified again for submissions.</p>   |