



File Ref: WW-01-10

9 January 2009



The Chairperson  
Board of Inquiry – Water  
C/- Ministry for the Environment  
PO Box 10362  
WELLINGTON 6143

Dear Sir

**SUBMISSION ON PROPOSAL FOR NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT - SECTION 49 OF THE RESOURCE MANAGEMENT ACT 1991**

This is a submission on the following proposed national policy statement (the proposal):

Proposed national policy statement for freshwater management.

New Plymouth District Council supports in principle the objectives and policies outlined in the proposal.

The specific provisions of the proposal that our submission relates to are:

i) *Objective 1 – Enabling well-being of people and communities.*

Our submission is that we strongly agree with the intent of this objective.

ii) *Objective 3 – Improving the quality of fresh water.*

*“... ensure appropriate Freshwater Resources can reach or exceed a swimmable standard.”*

Our submission is that we agree that the measure of a “swimmable standard” as a minimum standard is appropriate. It is a readily understandable measure for the public to grasp. However, the limitation of the current standard for measurement of a “swimmable standard” namely the “Microbiological Water Quality Guidelines for Marine & Freshwater Recreation Areas” must be taken into account. Water quality needs to remain of “a swimmable standard” throughout the year and not just in the swimming season and it also must apply in all weather conditions. Safe consumptive use of water by stock and communities is greatly enhanced by drawing water from safe catchments. A consistent approach to assessment of a “swimmable standard” by all regulators is essential and consideration needs to be made to ensure this happens.

As the main measurement proposed of assessing the microbiological quality of fresh water we seek the following change to the proposal – **Add** the proviso that: “The swimmable standard,

as measured using the Microbiological Water Quality Guidelines for Marine & Freshwater Recreational Areas, must apply throughout the year and in all weather conditions”

*iii) Policy 1, Section g.*

Our submission is that at times of low flow, such as in an extreme drought, there will be water takes, such as for domestic water supply, which must be allowed to continue to take water ahead of other users and to the full extent permissible on the basis that to not do so would potentially have severe public health risks.

*iv) Policy 1, Section (i) and (ii).*

Our submission is that we agree with the statement that “priority for reasonably foreseeable domestic supply” be given “over other competing demands”. This ensures the well being of communities of people, are put above the interests of commercial and industrial water users.

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

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Yours faithfully



Graham Morris  
TEAM LEADER TREATMENT

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