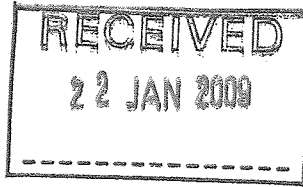


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FORM 3:

Submission on Proposal for National Policy Statement for Freshwater Management

Section 49 of the Resource Management Act 1991.

To: the Chairperson
Board of Inquiry

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

Proposed national policy statement for freshwater management.

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

The role of public health units and the Ministry of Health in the protection of the wellbeing of our community and inclusion of specific responsiveness to Tangata Whenua. This submission is prepared on behalf of Public Health South and was developed by Health Promotion Advisors, Health Protection Officers and a Public Health Researcher. Public Health South is one of twelve public health units in New Zealand and is owned and governed by the Otago District Health Board. It delivers public health services to over 288,000 people living in Otago and Southland. Public health services are offered to populations rather than individuals and are considered a public good. They fall into two broad categories – health protection and health promotion. They aim to create or advocate for healthy social, physical and cultural environments and are often 'invisible' until there is a problem. Positive outcomes are realised in the long term.

Our submission is:

In support of the national policy statement for freshwater management with following proposed changes:

We recommend the following changes be made to the proposal:

Preamble

- paragraph 6

The addition of two bullet points

- meet the aspirations of Iwi and Hapū by ensuring that mahinga kai gathered from Freshwater Resources is safe to be eaten
- increase the opportunities for Iwi and Hapū to participate in the management of, and decision-making regarding, Freshwater Resources

- paragraph 7

We agree that: *Councils will be expected to make information available* such as state of the environment reports and that this should be capable of showing improvement over time towards contact recreational water quality guidelines i.e. that they have indicators and sites selectively chosen to indicate improvements in water quality.

Replace *contact recreational guidelines* with a *freshwater gathering standard*
Each national state of the environmental report should demonstrate progress in achieving the **objectives** of the NPS and show continuing improvements in the state of New Zealand's Freshwater Resources, including towards meeting a **freshwater food gathering standard**.

Objectives

Objective 2

In addition to this we would add that the freshwater resource should be managed from the source environment to its end point of supply, including drinking water catchment areas which affect end point use, such as drinking water supplies.

Objective 3

In addition to this point we would add that the freshwater resource should not decline in quality and volume and that freshwater sources in a degraded state be remediated to a standard applicable for use

Objective 4

Include Tangata Whenua values and interests

Objective 5

We would support this initiative to control the effects of Land Use Development and Discharges of contaminants to avoid further degradation of freshwater resources. The conversion of pastoral land to dairy herding is a major issue for Otago and Southland and while the current economic situation may have slowed this process it is still likely to be the number one contributing source towards the degradation of water quality nationally.

Both Regional Councils and District Councils have the opportunity to coordinate with other key agencies and Non Governmental Organisations such as Department of Conservation and Fish and Game to ensure that there is a holistic approach towards improving the quality of water in the catchments where the waterway has been identified for recreational or drinking water quality purposes.

Objective 7

In addition to this objective we would like to add another bullet point which would enhance the social, economic and cultural well-being resulting from the use, development and protection of fresh water

Objective 8

We would use the word **participate** rather than involve and provide for, in the management of, and **decision-making regarding**, Freshwater Resources including the matters specified in Objectives 1-7.

Policies

Policy 1

* page 4 (c): We are in agreement that they need to set Freshwater Quality Standards and Environmental Flows and Levels in setting regional plans.

* Page 5 (d): Include Iwi and Hapū in the decision making as per the comment above concerning consultation and coordination with other agencies and the holistic management of catchment areas.

* page 5 (i): Guide and Direct Regional and District Plans to manage the demands for fresh water including the demands arising from land use Development and Discharges of Contaminants in a manner which –

- (i) Provides certainty for communities and water users for consumptive purposes through prioritisation of takes for a water supply
- (ii) Provides priority for reasonably foreseeable domestic water supply

We would fully support these policies however some guidance on 'reasonably foreseeable' maybe required.

Policy 2 para. (c)

- (i) Requiring all water permits for the consumptive use of fresh water to include conditions for the efficient consumptive use of that water – yes we would support this and it does apply to the agricultural and in particular dairying sector as well (large water users).

Note: Health and water quality are inextricably linked, however, the proposed policy does not contain a role for Public Health Units or the Ministry of Health.

As Public Health Units now have mandated functions and powers under the Health (Drinking Water) Amendment Act 2007 to protect the health and safety people and communities by promoting adequate supplies safe and wholesome drinking water from all drinking-water supplies. These functions and powers are carried out by Drinking Water Assessors (DWA), Medical Officers of Health and Health Protection Officers who are employed by Public Health Units. Public Health should rightfully be part of the management of our fresh water resources.

Inclusion of the Ministry of Health and their workforce as part of the integrated management contained within in the Proposed National Policy Statement for Freshwater Management is an accurate reflection of the management of our fresh water resources.

Policy 3 para. (b) (i)

We agree that there should be changes made to the regional policy statements that include the protection against the degradation of resources through the management of storm water discharges with respect to land use activities and subdivision i.e. that policy should indicate that these matters have to be adequately addressed at Council level when applications are received.

Policy 4 para. (h)

We are in agreement that this needs to be specifically considered in the preparation or amendments to the policy statements and plans. There should be some system for the wider agreement including consultation with the community on the minimal acceptable standard for the waterways including which waterways should be allocated for swimming. Current Regional Plans for Water list priority areas for protection and waterways which require upgrading. In some instances the standard allocated may not be an accurate or realistic expectation of the community in relation to contact recreation and whilst upgrading is an admirable goal it may impose unfair or unrealistic expectation on industry to meet pristine goals.

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)

.....
Date 21 January 2009

(A signature is not required if you make your submission by electronic means.)

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