

**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:

Preamble; Objective 2; Objective 3; Objective 6; Objective 7; Policy 1; Policy 2; Policy 6; Policy 9

My submission is that the following changes should be made to the proposal:

**Preamble**

1. Amend references to "local government", "territorial authorities", "regional councils", "councils" to clarify here and to be consistent throughout the proposal. Reason: not sufficiently specific and correct.
2. Amend use of "address" in goals. Reason: "addressing" issues is insufficient – more positive and appropriate verbs are needed.
3. Amend "national state of the environmental report". Reason: incorrect.
4. Amend "including that Freshwater Resources are swimmable" to limit to appropriate resources. Reason: unreasonable to require all freshwater resources, as defined, to be swimmable.

**Objectives 2 and 6**

1. Amend to provide for the 'benefits of' in addition to "effects on" and "demand for" fresh water. Reason: benefits, existing and future, also need [integrated] management.

**Objective 3**

1. See comment above on Preamble 4. But now guidance is needed on 'appropriate'.

**Objective 7**

1. Amend to specifically allow for recycled [treated or untreated] fresh water. Reason: it is implicit, but needs positive encouragement.

Policy 1

1. Amend in (a) "and other Freshwater Resources" to limit to appropriate resources.  
Reason: unreasonable to require all freshwater resources, as defined, to have quality standards, environmental flows and levels set.

Policy 2

1. Amend in (a) "for all Freshwater Resources" to limit to appropriate resources.  
Reason: unreasonable to require all freshwater resources, as defined, to have quality standards, environmental flows and levels set.
2. Amend (c) (i) to omit "and technology". Reason: it is included in "good practice", as elsewhere in the proposal.
3. Amend (c) (ii) to specifically allow for recycled [treated or untreated] fresh water.  
Reason: it is implicit, but needs positive encouragement.

Policy 6

1. Amend (d) to specifically allow for recycled [treated or untreated] fresh water.  
Reason: it is implicit, but needs positive encouragement.

Policy 9

1. Amend to change "no later than 10 years" to "no later than 5 years". Reason: 3 years trial is long enough to identify problems or gaps [if any] in implementation and effectiveness.

I seek the following changes to the proposal:

As specified above.

I do not wish to be heard in support of my submission.

If others make a similar submission, I will consider presenting a joint case with them at a hearing.

[Electronic submission].....

Signature of submitter

Date: 22 January 2009.....

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