

Regional Public Health
Better Health For The Greater Wellington Region



Facsimile Cover Sheet
Wharangi Nama Waea

Date/Te Ra:

To/Kia: Sefulu	From/Na: Chris Edmonds
Name of Agency/Wahi Mahi: Ministry for the Environment	Fax Number>Nama Waea: 439 7705

Number of pages/Nga Wharangi (including cover sheet) 4

Message/Karere:

Hi Sefulu

Please find attached a copy of our submission on the Proposed NPS for Resource Management

Regards

Chris

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He ture no nga korero katoa kei roto o tenet karere, no reira, kia tupato. Mehemea kaore matau kua e mau. Me whakamohiotia atu ki to Tari, me te mea nana i tono mai. E Tika Hoki.

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Submission on Proposal for National Policy Statement for Freshwater Management

Section 49 of the Resource Management Act 1991.

To: The Chairperson, Board of Inquiry

Name of Submitter: Regional Public Health (RPH)

Regional Public Health is a regional service located within the Hutt Valley District Health Board (HVDHB). Our geographical area of service delivery spans Hutt Valley DHB, Capital & Coast DHB and Wairarapa DHB. RPH delivers a range of population and personal health services, aiming to improve the health of communities throughout the greater Wellington region.

Our submission is in support of the Proposed National Policy Statement for Freshwater Management.

Regional Public Health considers that a National Policy Statement for Freshwater Management is important and timely and will provide guidance and a framework for regional councils and territorial authorities to protect and sustainably manage freshwater resources.

RPH seek the following changes to the proposal:

1. **Objective 3 - amend reference to "swimmable standard".**

Freshwater bodies are often used for a wide range of recreational uses. RPH therefore consider that the reference to "swimmable standard" should be expanded to include other important potential uses e.g. food gathering (watercress).

Decision requested:

Amend Objective 3: "...Freshwater Resources can reach or exceed a standard that provides for safe recreational and food gathering uses."

2. **Objective 5 - make explicit the need to address current as well as future land use development.**

Although it could be argued the term 'Land-use development' could cover both current and future use, at an operational level it is likely that most emphasis will be on future development. Current land use is a significant contributor to freshwater degradation and needs to be explicitly included.

Decision requested:

Amend Objective 5: "To control the effects of *current and future* Land-use Development and discharges of contaminants to avoid further degradation of Freshwater resources."

3. Objective 6 –

- make more explicit the need to significantly reduce the current high rates of water consumption
- add reference to “health and safety”

RPH considers it is essential to make more explicit the need to reduce overall water consumption in New Zealand. Currently New Zealand’s total water usage is two to three times higher than the OECD average (pg 13 Proposed National Policy Statement for freshwater Management: *Section 32 Evaluation*).

RPH also consider it vital that managing water demand does not impact on the health and safety of communities. It is therefore important to ensure that water demand management does not result in potential adverse public health effects e.g. communicable disease outbreaks, due to an inadequate supply of water for basic sanitation requirements or inappropriate conservation measures. RPH recommend that a specific reference to the health and safety of communities be added to Objective 6 to ensure that this is taken into account when managing water demand.

RPH strongly supports (b) which recognises the uncertain effects of climate change and the clear need for resilience planning at national and regional levels. This is particularly important from an inequalities perspective as people who currently experience disproportionate access to the determinants of health will be more severely impacted by adverse effects on public health and other aspects of climate change.

Decision requested:

Add to Objective 6:

- (d) *reducing the overall current rate of water consumption*
- (e) *health and safety of communities.*

4. Objective 7

- make more explicit the need to significantly reduce the current high rates of water consumption
- amend reference to “...excessive contamination”

RPH supports Objective 7 as we consider the efficient use of fresh water to be important to safeguarding freshwater resources from inappropriate use. RPH however consider that avoiding contamination of allocated freshwater as far as possible should be a significant aim of Objective 7 i.e. not just avoiding “excessive” contamination.

In addition, similar to comments for objective 6, RPH considers it is essential that in addition to avoiding wastage there should be a more proactive and sustainable review of current water usage

Decision requested:

Amend Objective 7:

- (a) *avoiding wastage and reducing high current consumption*
- (b) *“avoiding excessive contamination”*


5. Policy 4 – amend reference to swimmability.


Freshwater bodies are often used for a wide range of recreational uses e.g. swimming, food gathering (watercress etc.). RPH therefore consider that the reference to "swimmability" should be expanded to include other potential recreational uses.

Decision requested:

Amend Policy 4: "The value of *recreational uses e.g. swimming, food gathering*, to the community.

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


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Medical Officer of Health
Regional Public Health


Mr Peter Gush
Service Manager
Regional Public Health

Date: 22nd January 2009

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