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File 16.2.4

17th January 2008

The Chair
Board of Enquiry - Water
Freepost Board of Enquiry – Water
c/- PO Box 10362
WELLINGTON 6143

By email to freshwaternps@mfe.govt.nz

Dear Sir/Madam

CONSULTATION ON PROPOSED NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT:

This submission is made on behalf of Wenita Forest Products Limited (Wenita). Wenita owns and manages 30,000 hectares of plantation forest and is the largest forest owner in the Otago Region. The address for service is:

Wenita Forest Products Limited
PO Box 341
MOSGIEL
[Attention: Stephanie Rotarangi]
Phone: (03) 489-3234
Fax: (03) 489-3303
Email: stephanie.rotarangi@dn.wenita.co.nz

Thank you for the opportunity to prepare submissions on the proposed National Policy Statement for Freshwater Management (NPS). Wenita has refrained from a detailed critique of the proposed NPS, but wishes to raise some fundamental concerns with the wording and Objectives of the proposed NPS.

Wenita has misgivings with respect to the proposed NPS's Objectives focus on "land-use development" and "further degradation". Wenita strongly recommends the focus be on improving the quality of fresh water by ensuring both current and proposed land-users work within the parameters constituting the scientific and community limits to environmental degradation.

Wenita is concerned that the NPS does not go far enough to ensure the adverse effects of current land use are managed. The inclusion of the word "further" in Objective 5, suggests the proposed NPS's focus is on keeping pristine waterways pristine, whilst there is no corresponding focus motivating an improvement in degraded water. Such a stance increases the risk of differential regulation for resource users, despite the magnitude of their adverse effects on water quality. For example the current resource user operating around cleaner water bodies (i.e. forestry) potentially faces greater regulatory costs, than those operating around degraded waters (i.e. dairying). Wenita has concerns that under the proposed NPS existing polluters 'prosper' rather than 'pay'.

The majority of the Objectives appear focused on regulating land-use development. Again, Wenita argues that there is insufficient emphasis on reducing the effects of current land use. The protection of existing rights for adverse environmental effects by constraint on new entrants has the effect of rewarding the polluter – such an approach is neither just nor equitable.

Please consider Wenita's concerns with the focus of the NPS on land-use development and land-use change. The NPS requires more focus on –

- the source of pollution
- slowing the rate of decline in impact on freshwater
- an improvement in currently degraded water bodies.

Kind Regards
WENITA FOREST PRODUCTS LIMITED

Stephanie Rotarangi

stephanie.rotarangi@dn.wenita.co.nz