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Submitter type Business / Industry

Releasing submissions

1. Do you agree that overall water quality should be maintained or improved within a freshwater management unit rather than within a region? Why or why not? Yes

Why or why not?

It allows for better monitoring, based on scientific data collection, and more appropriate reporting. It also allows more appropriate accumulation to district, regional and national scale for tracking trends.

2. How should the attributes be applied, or the values protected, in giving effect to the requirement to maintain or improve overall water quality? Please explain.

By monitoring existing and historic ranges of attributes and setting objectives collaboratively [communities, interest groups including iwi, industries and industry associations] towards goals developed by them and approved by territorial and regional councils, acknowledging national policy and legislation.

3. What is an appropriate way to include measures of macroinvertebrates in the National Policy Statement for Freshwater Management? What alternative measures could be used for monitoring ecosystem health?

Include such indicators as MCI, dissolved oxygen and ecosystem cultural health evaluations [including by iwi].

4. What information should be required in a request to include significant infrastructure in Appendix 3 of the National Policy Statement for Freshwater Management, and why would this information be important?

This is not an appropriate question, at least not for me, as it presupposes agreement that 'significant infrastructure' should be exempt from national bottom lines with no obligation to work towards meeting them. An economic cost to a private body is not alone a sufficient reason to allow exemption; it might be more than balanced by a public environmental benefit. For this reason, the information required IF such provision for significant infrastructure remains, should include an approved path and timeline to meet national bottom lines.

5. Do you agree with applying lake attributes and national bottom lines to intermittently closing or opening lakes or lagoons? Why or why not? No

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ICOLLS should have their own set of national bottom lines, taking in to account appropriate ecosystem attributes, including healthy salinity ranges.

6. What information should be required in a request to list a water body in Appendix 4 of the National Policy

Statement for Freshwater Management, and why would this information be important?

The information should include evidence on why the water body or FMU is in a degraded state, what that state is, and a proposed or agreed timeline for rehabilitation.

7. Do you agree with the proposed requirements and deadlines for excluding livestock from water bodies? Why or why not? No

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8. Should standards for efficient water use be developed?

Yes. Yes. By a collaborative process involving communities, interest groups including iwi, industries and industry associations, with approval and statutory recognition by territorial and regional councils, acknowledging national policy and legislation. This has already been achieved in part in Canterbury.

9. Do you support easier transfer of consents? Do you think the changes outlined in Proposal 2.4 would better enable transfers? What other changes would better enable transfers?

'Easier transfer' in the sense of reduced bureaucracy I support. But Proposal 2.4 illustrates a much more general shortcoming of the whole 'Next Steps' document. 'Users' means 'consent holders', not all legitimate users of water. 'Higher valued uses' means only higher economic valued uses, not including uses which might be highly valued by the public or of high values to ecosystems. There are times when consents should be 'transferred' to public good uses.

10. How should the Government help councils and communities address over-allocation for water quality and water quantity? Should it provide guidance, rules or something else (please specify)?

Appropriate national policies and national bottom lines are/would be helpful. Further encouragement of collaborative processes and enabling legislation would be helpful. Specific encouragement of meeting quantity and quality limits in Crown-assisted development [e.g. IAF and CIIL funding] is already helpful. Guidance, yes; rules, no [TLA and Regional Council responsibility]; something else would usefully be direct funding of public good projects to address urgent and significant water quality problems e.g. the ICOLLs.

11. Should councils have greater flexibility in how they meet the costs of improving freshwater management? For example, by recovering costs from water users and those who discharge to water? Please provide examples.

This is not an area with which I am fully conversant. I suspect councils already do have considerable flexibility but might need guidance and encouragement to use it more imaginatively and fully.

12. How can the Government help councils and communities to better interpret and apply Te Mana o te Wai in their region?

There are already good examples in some regions of understanding of tangata whenua values by the wider community due to effective two-way communication in collaborative processes [e.g. the Canterbury Water Management Strategy.] A Central Government role could be to ensure that there is adequate dissemination of these examples to other councils and communities.

13. Should councils be required to identify and record iwi/hapu relationships with freshwater bodies, and how should they do it?

Such relationships are already identified and recorded -- by the iwi and hapu. Councils should receive guidance, and share good practice, on how they note and record those relationships.

14. What would support councils and iwi/hap? to engage about their values for freshwater bodies?  
Trust; integrity; opportunities with sufficient time available; belief that there will be genuine listening.

15. What are your views on the proposal for a new rohe-based agreement between iwi and councils for natural resource management? What type of support would be helpful for councils and iwi to implement these to enable better iwi/hap? engagement in natural

It seems a good proposal. It should not over-ride or replace existing arrangements, whether or not these have arisen under Treaty of Waitangi settlements, unless by mutual agreement.

16. What are your views of the proposed amendments to water conservation orders? Outline any issues you see with the process and protection afforded by water conservation orders?

Amendments to provide a greater role for iwi and to improve integration with regional planning are welcome. A proposal to allow creation of a WCO by council recommendation to the Minister for the Environment should not be such as to circumvent appropriate public participation.

17. If you are involved with a marae or live in a papak?inga, does it have access to clean, safe drinking water? What would improve access to clean, safe drinking water for your marae or papak?inga? Not applicable

18. Do you agree with the proposed criteria for the Freshwater Improvement Fund? Why or why not?  
Broadly, yes. Funding for public good aspects of water management projects which otherwise restrict benefits to private financial benefits has been difficult or impossible to obtain. Benefits and costs referred to in criteria 2, 3, 4, 7, 8, 9 should be evaluated more generally than by monetary-only indicators.

19. Do you have any further comments you wish to make about the Government's proposals?

- i) p. 12: "wetlands" are not an "attribute"; they are 'freshwater bodies'.
- ii) p. 14: "significant infrastructure" can have water quality benefits e.g. well-flushed hydro lakes. It can also be proactive about remedying disbenefits.
- iii) p. 22: More efficient water use should not always be used to "create room for new {consumptive} users". Sometimes it should contribute to improving water quality.
- iv) p. 24: "Higher value use" should not have the restricted meaning of 'higher specific economic return'.
- v) pp. 25, 33: There needs to be a specific enquiry in to funding costs of legacy deleterious outcomes not attributable to current water users.
- vi) p. 35: "These public investments have been guided by the best available scientific evidence about what types of projects can most effectively improve water quality" does not apply to the M\$400 CIIL funding referred to just preceding the statement.
- vii) These 'Next Steps' are, in part, a sub-set of previous LAWF recommendations. However, LAWF has been adamant that Government should not 'cherry-pick' from their recommendations and this appears to be what has occurred.
- viii) As with the insufficiently aspirational bottom lines in the National Objectives Framework, these Next Steps do not go far enough in dealing with the present, and presently locked-in for the future, issues related to water management in New Zealand. In most cases the direction is appropriate, but the size, number and speed of the 'Steps' need to be much increased.