

Proposed amendments to the National Policy Statement for Freshwater Management 2011



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Personal details

If you are making this submission as a representative for an organisation, the name of that organisation will be used in any reports on the submissions, but your name will be withheld. If you are making this submission as an individual, your name will be used in any reports on the submissions unless you request otherwise.

First name [withheld]

Surname [withheld]

Email [withheld]

Organisation

Telephone

[withheld]

I give permission to publish my details No

Why do we need to amend the NPS-FM?

1. Have we correctly identified the problems currently associated with implementing the NPS-FM?
2. If not, what problems, if any, you have faced with implementation?

Options for providing further national direction

3. Do you agree that amending the NPS-FM would solve the problems identified in section 2?

Comment

4. If not, would additional guidance be sufficient to solve the problems identified?

Comment

5. Is there another solution to the problems? Why would that be preferable?

Comment

Proposed amendments to the NPS-FM: accounting

6. Do you agree with requiring councils to account for all water takes? Yes

Comment

7. Do you agree with requiring councils to account for all sources of contaminants? Yes

Comment

8. Do you think that the requirements in policies CC1 and CC2 of the proposed NPS-FM amendments have the right balance between national prescription and regional flexibility?

Proposed amendments to the National Policy Statement for Freshwater Management 2011



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Comment

9. Do you think the time period allowed for councils to develop accounting systems is appropriate?

Comment

Proposed amendments to the NPS-FM: NOF values

10. Should there be a national set of values as outlined in appendix 1 of the proposed NPS FM? Yes

Comment

11. Are there any additional values that should be included? Why are these values nationally significant/important (recognising that councils can use other values if they wish)?

Comment

12. Are there any values that should be deleted from appendix 1 of the proposed NPS-FM and why?

Comment

13. Do you agree with the descriptions of the national values in appendix 1 of the proposed NPS FM?

Comment

Proposed amendments to the NPS-FM: NOF attributes

14. Do you agree with the attributes associated with the values in appendix 2 of the proposed NPS FM?

Comment

15. Do you agree with the numeric attribute states in appendix 2 of the proposed NPS FM?

Comment

16. Do you agree with the narrative attribute states in appendix 2 of the proposed NPS FM?

Comment

Proposed amendments to the NPS-FM: Timing of putting NOF in place

17. Do you agree with putting a NOF in the NPS-FM now, including only the attributes for which there is adequate evidence, and updating it as the scientific basis for further attributes and states become available? No

Comment

there is currently a large amount of scientific information available, but where-ever there is gap in the information available a precautionary approach should be mandated to ensure water is maintained or enhanced.

18. Or should the Government delay putting the NOF into place until a more comprehensive set of attributes has been developed?

Comment

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there is currently a large amount of scientific information available, but where-ever there is gap in the information available a precautionary approach should be mandated to ensure water is maintained or enhanced.

Proposed amendments to the NPS-FM: Processes for freshwater objective setting

19. Do you agree with having the process requirements to link values and freshwater objectives directed in policy CA1 in the proposed amendments? If not, why not?

Comment

20. Do you think the process outlined will work? If not, why not?

Comment

21. Do you agree with the proposed matters in policy CA1(e) that must be considered when establishing freshwater objectives? If not, why not?

Comment

22. Is it clear that setting freshwater objectives is an iterative process which involves consideration of the impacts of the limits, management methods, and timeframes required to meet a potential freshwater objective? No

Comment

I consider the overriding objectives should be to ensure that fresh water quality is maintained or enhanced at levels that would exist without any extraction or contamination as a result of human activity

23. Do you agree that regions should have discretion to determine timeframes for meeting freshwater objectives? No

Comment

there should be mandatory timeframes for achieving water quality standards, and penalties or consequences for not achieving them

24. Are there any aspects of the process that are not clear?

Comment

Proposed amendments to the NPS-FM: Compulsory values

25. Do you agree that ecosystem health should be a compulsory value? Yes

Comment

26. Do you agree that human health for secondary contact recreation (such as boating and wading) should be a compulsory value? Yes

Comment

but i consider this is inadequate and human health for primary contact recreation should also be a compulsory value.

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27. Do you think there should be more compulsory values? If so, what should they be, and why? What attributes should be associated with them? Yes

Comment

human health for primary contact recreation should be a compulsory value in all fresh water sources

Proposed amendments to the NPS-FM: National bottom line

28. Should there be numeric bottom lines for attributes of the compulsory values? Yes

Comment

and the standards should reflect the fundamental importance of clean freshwater, available in adequate quantities, for human and ecosystem health.

29. Do you agree with the proposed level at which bottom lines would be set for each attribute of ecosystem health? If not, at what level should they be set?

Comment

30. Do you agree with the proposed level at which bottom lines would be set for each attribute of human health for secondary contact recreation? If not, at what level should they be set? No

Comment

the bottom lines should be set at levels appropriate for primary contact recreation and ecosystem health

31. Do you agree that transitional arrangements should be provided to allow councils and communities to set objectives below a national bottom line for a short time? No

Comment

the objectives should always reflect the bottom line standards, even if they will be difficult to achieve in the short term.

Proposed amendments to the NPS-FM: Exceptions to bottom lines

32. Do you agree that there could be exceptions where the natural state of the freshwater management unit breaches bottom lines? Where in your region do you think this type of exception might apply? No

Comment

because such exceptions may be used as a bench mark by which to justify further exceptions for non-natural breaches

Where in your region do you think this type of exception might apply? No

Comment

because making such exemptions removes any incentive to explore alternative or new ways to remedy such historical effects.

Proposed amendments to the National Policy Statement for Freshwater Management 2011



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34. Do you agree that there could be exceptions for significant existing infrastructure (eg, dams), where a choice is made to manage a freshwater management unit below bottom lines? Where in your region do you think this type of exception might apply? No

Comment

Such exemptions would mean the owners and operators of existing infrastructure would not devote resources to improving performance if they anticipate being able to continue management below bottom lines when planning for the expiry of existing consents. The absence of any exemptions would mean they are on notice that bottom lines will apply when seeking to renew consents for existing infrastructure. Further, international experience is that old and inefficient dams can be removed, and their impact on the environment reversed to a large extent. Mandatory bottom lines that are relevant to modern standards for environmental impacts will ensure that the true costs of ageing infrastructure are factored into decisions about whether to re-consent or replace.

35. Do you agree that freshwater management units eligible under the first two exceptions above should be decided by regional councils?

Comment

36. Do you agree that freshwater management units eligible for an exception due to the effects of significant existing infrastructure should be decided at a national level and included in appendix 3 of the NPS-FM? Yes

Comment

37. What should the criteria be for allowing exceptions based on significant existing infrastructure?

Comment

Proposed amendments to the NPS-FM: T?ngata whenua values

38. Do you think the proposed NPS-FM adequately provides for Te Mana o te Wai?

Comment

39. Do you agree with the way t?ngata whenua values are described in proposed appendix 1 of the NPS-FM?

Comment

40. Do you support adding Te Mana o te Wai to objective A1 of the amended NPS FM as a matter that must be safeguarded? What would be the implications of adding this to objective A1 in the NPS-FM?

Comment

Proposed amendments to the NPS-FM: Monitoring

41. Do you agree with the new section in the NPS-FM requiring monitoring plans? If not, why not?

Comment

Other comments

42. Is there anything else you would like to tell us about the issues and proposals in this document?

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