

Your submission to Clean Water

Douglas Black



Clause

What are your thoughts on the proposed swimming targets, for example, on the timeframes and categories?

Notes

I support Forest and Bird, Greenpeace and other ngo recommendations

Clause

What do you think about the proposed amendments to the Freshwater NPS?

Notes

I support Forest and Bird, Greenpeace and other ngo recommendations

Clause

What are your thoughts on the proposed stock exclusion regulation, for example, the timeframes and stock types to be excluded?

Notes

I support Forest and Bird, Greenpeace and other ngo recommendations

Clause

Do you have any other comments on the contents of the Clean Water discussion document?

Notes

I was horrified to learn from mz's 9 to noon programme on 27 April 2017 about the inclusion of a requirement in the draft Freshwater Management policy statement for local authorities to consider economic benefit aspects of a proposal on an equal footing with its environmental aspects – subverting the basic principle of the RMA, the parent legislation for the Policy Statement. This requirement is totally unacceptable, and I believe unlawful, and its inclusion is particularly outrageous since it was first proposed in the Government's recent review of the RMA, but was specifically rejected by Parliament, as pointed out by Katherine Ryan in her interview with Fish & Game's Bryce Johnson. I agree with Mr Johnson that this requirement will serve only to allow further degradation of our freshwater resources; it is well-known that the environment is vulnerable in any cost-benefit analysis of development proposals as there is no robust way of assigning \$ values to environmental values, which can thus easily be discounted by prodevelopment forces. I also agree with recent reports that NZ is already past the point at which freshwater degradation should have been limited, and the Government now needs to accept that a limit has been reached (if not already breached) to permitting further development in already stressed freshwater ecosystems. I would therefore submit that this requirement be removed from the NPS-FM before final publication, and the Policy Statement be fully in accord with the principles of the RMA, and reflect all relevant scientific evidence on the sustainability of freshwater ecosystems in the long term.