

## **Submission on the proposed amendments to the National Policy Statement for Freshwater Management 2011**

The National Policy statement is hampered by the fact that the current system allocates water rights on a case by case basis and with no systematic overview where priority is given to the most essential uses and values of the catchment and the health of its ecosystems. This needs to change.

We do indeed need a management system to ensure there is sustainable and productive use of New Zealand's freshwater resources.

I therefore welcome that (Page 58):

This national policy statement sets out objectives and policies that direct local government to manage water in an integrated and sustainable way, while providing for economic growth within set water quantity and quality limits.

The national policy statement is a useful step to improve freshwater management at a national level. However sustainable management requires an active positive approach. The current system takes a negative approach first, defining lower limits, and only then seeking optimum outcomes. If limits are set too low (or the current situation is already exceeding the limit or is otherwise unsustainable) then irreversible damage can be done before measures take effect.

The proposed amendments need to be applied in a stronger and more systematic way. Freshwater needs to be managed as an integrated whole over the entire catchment, from the top boundary to the coast, including estuaries.

I generally support the proposed amendments to the National Policy Statement for Freshwater Management 2011

I strongly support Objective C1

To improve integrated management of fresh water and the use and development of land in whole catchments, including the interactions between fresh water, land, associated ecosystems and the coastal environment.

Also I urge that the proposed amendments (Page 52) proceed as soon as possible.

Minor amendments proposed to the NPS-FM and proposed implementation guidance will make the existing requirements clearer, and further work is being carried out to populate the NOF in relation to the effects of freshwater management on the coastal receiving environment, such as estuaries and lagoons. Further amendments to the NPS-FM are anticipated in future, to include additional values and attributes for these areas in the NOF, as the technical work to define them is completed.

To achieve the desired "sustainable and productive use of New Zealand's freshwater resources" the standards, objectives, policies need to be set accordingly.

### **Specifically:**

I support the Objectives A1 and A2 but with the exception that:

Objective A1 b should require water to be safe for swimming. This should be the minimum standard. If this is not currently achievable then a recovery plan with staged goals and timeframes

should be required - as in Policy A2 (Page 64).

Also there needs to be adequate monitoring and enforcement to see that the objectives are being met, and to ensure appropriate actions are taken. Attributes should be monitored at sufficient points to give a measure of the quality/health of the water body being measured, not just at point discharges.

The timeframes for Councils to meet the requirements of the NPS-FM and NOF need to be set so positive management can begin as soon as possible, and not be used as a delaying tactic.

As well as those indicated in the table of proposed and potential attributes (Page 27), attributes monitored for human health in lakes and rivers should include:

E. coli – **primary** contact (in accordance with recommendations for Objective A1)

Periphyton

Water Clarity

Groundwater should be monitored for nitrate levels.

Attributes monitored for ecosystem health should include:

The Macro-invertebrate Community Index

Appropriate upper limits should be set to the levels of phosphorus and nitrate allowed in water bodies. Similarly for lower levels of dissolved oxygen.

I support having an independent review (Page 60):

The Minister for the Environment intends to seek an independent review of the implementation and effectiveness of this national policy statement in achieving all its objectives and policies and in achieving the purpose of the Act, no later than five years after it comes into force.

Roderick Aldridge