

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

Organisation

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Address

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Why do we need to amend the NPS-FM?

1. Have we correctly identified the problems currently associated with implementing the NPS-FM? Yes
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? Yes

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? No

Comment

Proposed amendments to the NPS-FM: accounting

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

Comment

Agree with this provided they are realistically resourced and organised to do so on the introduction of such a system.

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

Comment

Again provided this change to the policy is matched with sufficient resourcing and organisational structures are

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geared to provided for this prior to it being introduced.

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? Yes

Comment

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

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)? No

Comment

12. Are there any values that should be deleted from appendix 1 of the proposed NPS-FM and why? No

Comment

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

Comment

Generally agree with the description of national values however perhaps in relation to the human health value there should be some idea given on what boating where there is a high likelihood of immersion would actually be with a few examples eg: kayaking ??

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? Yes

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? Yes

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? Yes

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Comment

18. Or should the Government delay putting the NOF into place until a more comprehensive set of attributes has been developed? No

Comment

The process of obtaining adequate scientific evidence will always be evolving and unfolding.

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? Yes

Comment

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

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? Yes

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? Yes

Comment

23. Do you agree that regions should have discretion to determine timeframes for meeting freshwater objectives? Yes

Comment

They should have some discretion, but there should be some outlying parameters to this exercise of discretion.

24. Are there any aspects of the process that are not clear? No

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

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

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should be associated with them? No

Comment

Proposed amendments to the NPS-FM: National bottom line

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

Comment Yes if there is enough scientific certainty around this.

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?

Comment

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? Yes

Comment This would be a pragmatic approach.

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? Yes

Comment

However the wording should be very clear as to what circumstances fall outside these exceptions, so these provisions are not used in a way that was never intended.

Where in your region do you think this type of exception might apply? Yes

Comment

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? Yes

Comment

35. Do you agree that freshwater management units eligible under the first two exceptions above should be decided by regional councils? No

Comment To remove bias should probably be determined at a national level.

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

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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? Yes

Comment

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

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? Yes

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? Yes

Comment

Other comments

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