

# 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 ]

Address [ withheld ]  
[ 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? Yes

Comment

4. If not, would additional guidance be sufficient to solve the problems identified? No

Comment

It would make it too easy for councils to ignore poor quality rivers and over allocate water from them.

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

Someone needs to monitor our rivers to stop them deteriorating further. Either councils or people employed by MFE need to do it.

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

Comment

Our rivers need to be monitored to stop them deteriorating further. Either councils or people employed by MFE need to do it.

Any contaminants in the water need to be sourced and stopped. I, and many other people do not want any contaminants entering our rivers, lakes, wetlands and groundwater.

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? No

Comment

I think the requirements in policies CC1 and CC2 of the proposed NPS-FM amendments should be a national prescription. Otherwise it would be too easy for councils to ignore poor quality and quantity of water, and deterioration of our freshwater rivers, lakes, wetlands and groundwater.

9. Do you think the time period allowed for councils to develop accounting systems is appropriate? No

Comment

All councils must be required to establish and operate a freshwater quality accounting system and a freshwater quantity accounting system for freshwater management units and to set freshwater objectives and limits in accordance with Policy A1, Policy B1, and Policies CA1-CA3; and maintain a freshwater quality accounting system and a freshwater quantity accounting system at levels of detail that provide an accurate account of the freshwater quality and freshwater quantity issues, respectively, in each freshwater management unit within 24 months from the date of entry into effect of these amendments to the NPS-FM.

Every regional council should take reasonable steps to ensure that information gathered in accordance with Policy CC1 is available in a suitable form for the freshwater management units where freshwater objectives and limits have been set; and that in terms of information relating to a freshwater quality accounting system and in terms of information relating to a freshwater quantity accounting system established under Policy CC1. The information shall relate to at least one yearly intervals.

Five years for information to be got for freshwater quality is too long if problems develop. Any poor water quality issues need to be stopped and rectified as soon as possible.

## 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)? Yes

Comment

The following value is nationally significant and important as people need to know wherever they go it is safe to enjoy our water. It should be a Compulsory National Value.

Human health – The freshwater management unit will not present unacceptable risks to human health when used

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for swimming, immersion, food and water sources for humans and animals. In recognising this value, there would be no risk of infection or illness to people when swimming or involved in similar activities that do involve immersion in the water. Additionally, other contaminants or toxins, such as toxic algae, would not be present in any quantities that they would harm people. In some freshwater management units, the risk of infection or illness to people should be no greater than what would exist there under natural conditions.

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

Comment

Delete:

"Human health (secondary contact recreation) – The freshwater management unit will not present unacceptable risks to human health when used for wading or boating (except boating where there is high likelihood of immersion) In recognising this value, there would be no more than moderate risk of infection or illness to people when wading or boating or involved in similar activities that do not involve immersion in the water. Additionally, other contaminants or toxins, such as toxic algae, would not be present in such quantities that they would harm people. In all freshwater management units, the risk of infection or illness to people would be no greater than what would exist there under natural conditions."

Replace with:

"Human health – The freshwater management unit will not present unacceptable risks to human health when used for swimming, immersion, food and water sources for humans and animals. In recognising this value, there would be no risk of infection or illness to people when swimming or involved in similar activities that do involve immersion in the water. Additionally, other contaminants or toxins, such as toxic algae, would not be present in any quantities that they would harm people. In all freshwater management units, the risk of infection or illness to people should be no greater than what would exist there under natural conditions."

This value is nationally significant/important as people need to know wherever they go it is safe to enjoy our rivers and lakes.

13. Do you agree with the descriptions of the national values in appendix 1 of the proposed NPS FM? No

Comment

English should be used first in all headings and any translation into Maori words should follow. It should be made clear that the National Values apply to all New Zealanders and not just Maori. There should also be a glossary of all Maori words and their meaning in English for NPS-FM.

## 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? No

Comment

Attributes for rivers and lakes should include total nitrogen and total phosphorus, pH, sediment, invertebrates, and fish, Benthic cyanobacteria, Nitrate toxicity, Ammonia toxicity, periphyton, clarity, heavy metals, organic contaminants, and pathogens in Version 1 of the NOF for both Ecosystem health, places of food and food gathering and human health (all types of contact with water).

Attributes for wetlands should include ammonia toxicity and nitrate toxicity in wetlands in Version 1 of the NOF.

Attributes for groundwater should include ammonia toxicity and nitrate toxicity and total nitrogen and total

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phosphorus in Version 1 of the NOF.

Rules should ensure attributes for the following

- water clarity and periphyton cover (a measure of how much algae, bacteria and detritus is covering the river bed) are monitored;
- monitoring of aquatic insects to ensure our rivers are healthy;
- there is a limit on both problem pollutants nitrogen and phosphorus so they don't cause nuisance algal growth.

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? Yes

Comment

We need to start trying to improve our freshwater, rivers, lakes, wetlands and groundwater as soon as possible. Scientists should be employed immediately to provide adequate evidence, and update the NOF in the NPS-FM as soon as the scientific basis for further attributes and states become available.

The NOF in the NPS-FM should be updated as more comprehensive set of attributes are developed.

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

Comment We need to start improving our freshwater sources as soon as possible.

## 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

It would only work if councils and all people were totally committed to improving our freshwater.

21. Do you agree with the proposed matters in policy CA1(e) that must be considered when establishing freshwater objectives? If not, why not? No

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Comment

I presume the question should say policy CA1 (f)

Councils should not have the option to set long time frames for achieving targets. They should start working towards targets as soon as possible. (CA1 f. vi.)

Implementation by a regional council of the NPS-FM should be implemented by 31 December 2014 and any amendments to the NPS-FM within 2 years of the amendments becoming adopted and official.

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

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

Comment

It would be too easy for councils to ignore poor quality and quantity of water and deterioration of our freshwater rivers, lakes, wetlands and groundwater.

Policy E1 should say that the implementation by a regional council of the NPS-FM should be implemented by 31 December 2014 and any amendments to NPS-FM within 2 years of the amendments become official .

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

Comment I am not sure what is meant by a iterative process (question 22)

## Proposed amendments to the NPS-FM: Compulsory values

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

Comment

We need to put care of the ecosystem and natural environment as top priority. A high quality natural environment is vital for human health.

Many tourists come to NZ because of its natural environment. A true clean, green image would be rewarding for our exports especially food.

26. Do you agree that human health for secondary contact recreation (such as boating and wading) should be a compulsory value? No

Comment

It should be replace with:

"Human health – The freshwater management unit will not present unacceptable risks to human health when used for swimming, immersion, food and water sources for humans and animals. In recognising this value, there would be no risk of infection or illness to people when swimming or involved in similar activities that do involve immersion in the water. Additionally, other contaminants or toxins, such as toxic algae, would not be present in any quantities that they would harm people. In all freshwater management units, the risk of infection or illness to people should be no greater than what would exist there under natural conditions."

I want strong rules that protect our rivers, lakes wetlands and groundwater and ensure that they are safe for

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swimming, food and water sources for humans and animals.  
Ensuring rivers and lakes are clean enough to swim in, get food from, and use water from for home garden use and animal drinking water should be a compulsory standard, not optional.  
People need to know wherever they go it is safe to enjoy our rivers and lakes.

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 – The freshwater management unit will not present unacceptable risks to human health when used for swimming, immersion, food and water sources for humans and animals. In recognising this value, there would be no risk of infection or illness to people when swimming or involved in similar activities that do involve immersion in the water. Additionally, other contaminants or toxins, such as toxic algae, would not be present in any quantities that they would harm people. In all freshwater management units, the risk of infection or illness to people should be no greater than what would exist there under natural conditions."

People need to know wherever they go it is safe to enjoy our rivers and lakes.

The following Additional National Values should be made compulsory:

Contributes to Te Mana o te Wai - the health of the environment - Natural form and character - people value natural qualities.

Contributes to Mana Tangata - food gathering, places of food, food is safe to harvest and eat.

Contributes to Mana Tangata - cultivation - food security. To make sure there is enough water for domestic use and animal drinking water in rural areas.

Contributes to Mana Tangata - recreation - contact recreation. People need to know wherever they go it is safe to enjoy our rivers and lakes.

Contributes to Mana Tangata - drinking water - water is safe for human and animals to drink.

I want strong rules that protect our rivers, lakes wetlands and groundwater and ensure that they are safe for swimming, food and water sources for humans and animals.

Ensuring rivers and lakes are clean enough to swim in, get food from, and use water from for home garden use and animal drinking water should be a compulsory standard, not optional.

These should be made compulsory values because they are so important in my and many other people's lives.

I live next to a river which I also walk along most days. I like to eat watercress from the river and the water is used for my garden, especially vegetables and fruit.

The animals get their drinking water sourced from it. I would like the option to go swimming. It would be a relief to know it is safe to get it from our river and know it's not contaminated.

I value its Natural form and character and like to see the rare fish, water creatures and the birds who rely on it.

Many other New Zealanders and tourists would think the same.

## Proposed amendments to the NPS-FM: National bottom line

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

## Comment

It would make it too easy to ignore or cover up problems with the water if there are no specific numeric bottom lines.

Or it would make it too difficult to interpret whether the bottom lines are under or over achieved.

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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? No

Comment

The proposed level at which bottom lines would be set for each attribute of ecosystem health is too low. They should all be set at the Attribute State of 'A'.

Human, animal, plant and environmental health, and our economy depend on safeguarding our environment. Rivers, lakes wetlands and groundwater are a very important part of it.

There is no reason not to aim for a truly natural, clean healthy and safe ecosystem and environment.

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

All bottom lines should be set at Attribute State of 'A'.

People want and need to know that the water is clean enough for swimming, drinking and other uses, not just wading or boating.

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

Councils and communities should work towards the national bottom lines as soon as possible and not have the option of delaying it.

Central Government must provide more resources, finance, support and highly qualified people to help councils improve and manage our freshwater, including rivers, lakes, wetland and groundwater.

## 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

The only circumstances when an exception might apply are where a freshwater management unit is contaminated from natural processes, such as a native bird colony nesting above a river which causes E. coli levels to breach national bottom lines for E. coli.

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

Comment

Everything possible should be done to improve water where historical activities have created impacts on water quality.

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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

Everything must still be done to try to improve the water quality. No new dams should be allowed to be built on rivers.

Where significant existing infrastructure (e.g., dams) are in place if it affects water quality this must be tried to be rectified.

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

Comment

It would be too easy for councils to put any water difficulties aside. Central Government should provide more people and resources to help Regional councils improve our freshwater.

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 Ideally there should be no exceptions.

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

Comment

Only where infrastructure is used for vital services like electricity and drinking water for humans, should these be considered for exceptions.

## 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

The values of Te Mana o te Wai are applicable to many New Zealanders and it should be shown as this in the NPS-FM.

Maori or any other race should not have special priority or mention in any policies or governance or consultation. All New Zealand citizens should be treated equally.

39. Do you agree with the way t?ngata whenua values are described in proposed appendix 1 of the NPS-FM? No

Comment

English should be used first in all headings and any translation into Maori words should follow.

It should be made clear that the National Values apply to all New Zealanders and not just Maori.

There should also be a glossary of all Maori words and their meaning in English for NPS-FM.

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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

It should also be clearly stated in English and made applicable to benefit all New Zealanders.

## 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

Our rivers need to be monitored to stop them deteriorating further. Either councils or people employed by MFE need to do it.

Any contaminants in the water need to be sourced and stopped. I, and many other people do not want any contaminants entering our rivers, lakes, wetlands and groundwater.

Any over extraction of water needs to be stopped. This monitoring needs to be done on a yearly basis.

## Other comments

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

Oil exploration and production should be prohibited from working near our rivers, lakes, groundwater aquifers, and wetlands. They should be prohibited from taking water from these sources.

Policy A4

Any discharges which contaminate water should be prohibited if it would have any adverse effects on human or ecosystem health.

The health of the ecosystem and human health should be given top priority when considering water quality and quantity. Water use for commercial use and economic gain should be secondary. Everybody and businesses must learn to live sustainably.

Damming of rivers for irrigation should be prohibited. The natural form and character of our rivers and lakes should be protected.

New Zealand should aim to have the best quality natural ecosystems including lakes, rivers, groundwater and wetlands in the world. We are a small country and this would be a wonderful aim to achieve.

It would be positive for our health and economy. To be able to live up to our claim of clean and green would be a great selling point for our exports and a great attraction for tourists.

Central Government must provide more resources, finance, support and highly qualified people to help councils improve and manage our freshwater, including rivers, lakes, wetland and groundwater.

Human health and our economy depend on safeguarding our environment.

Maori or any other race should not have special priority or mention in any consultation, or governance, or in policies. All New Zealand citizens should be treated equally.

All objectives and policies in the NPS-FM should worded for that effect.