

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]

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? No

Comment the wording of the amendment is too vague and open to interpretation.

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? Yes

Comment

More specific expectations that both ensure the improvement of fresh water quality in rivers and lakes sufficient for people to swim in and native birds, fish and animals to survive healthily in.

Proposed amendments to the NPS-FM: accounting

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

Comment It is important to identify one responsible agency responsive to public opinion.

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

Comment See above.

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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

National prescription needs to set a very high standard. Regions are too influenced by local needs and individual people to be allowed flexibility about standards. There are large national interests involved.

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

Comment Action needs to happen yesterday!

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

National values sets the intention of the document and is essential in directing judges in court decisions. It helps with any interpretations of the document.

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?

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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?

Comment

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?

Comment

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

Comment

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?

Comment

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

Comment

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?

Comment

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Proposed amendments to the NPS-FM: National bottom line

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

Comment

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 levels should be set at primary contact. e.g. swimming. It is a crime that dogs and people can no longer swim in the Ashley river.

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

NZ nature cannot wait any longer. The state of some of the rivers has gotten so bad that species are threatened with extinction. There can be no waiting or exceptions!

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

Again, too many nz native fauna are threatened with extinction. Too much water is being exploited for individual profit.

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

Comment

There should be an attempt to reverse the impacts as much as possible. These types of loop holes will allow people to use the courts etc to avoid making the changes. The expectations need to be absolutely clear.

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

The structure needs to be brought up with compliance. Immediately. otherwise there will be an assortment of reasons why we need to wait 20 years or so. The softly softly approach has not worked.

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

Comment

Regional councils are too narrow in their appreciation of the value of fresh water and too predictable in their collapse to local "important people".

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? No

Comment There should be no freshwater exceptions.

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?
The state of fresh water in new Zealand is shameful for all of us. There needs to be sufficient laws to both improve the quality of the water and maintain it as clean. Are we a third world country?? Seems like it sometimes. Willing to sacrifice anything for the big chiefs to make a profit.