

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]

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Organisation [withheld]

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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? No

2. If not, what problems, if any, you have faced with implementation?

The time frame of 2030 for councils to have set freshwater objectives that reflect national and local values is too far out for the sake of freshwater bodies. Time frames need to be shortened to 2019, 2020 (at the very latest) for setting flow, allocation and water quality limits to ensure freshwater objectives are achieved, otherwise freshwater decline will continue.

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

This is a yes and no answer here. Amending is required but clear understanding from all players is vital. If we cannot draw freshwater for drinking supplies, cannot swim in it or we cannot recreate in or fish from it, and conversely its degraded quality creates dysfunctional communities, then we need to be taking action to rehabilitate water as quickly as possible. These comments are made from 18 years of action research and making change by just getting on with it!

4. If not, would additional guidance be sufficient to solve the problems identified? Yes

Comment

Look at multi entity collaborative action research that is underway at present for Manawatū River Leader's Accord and Action Plan and Manaaki Taha Moana www.mtm.ac.nz.

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5. Is there another solution to the problems? Why would that be preferable? Yes

Comment

Look at multi entity collaborative action research that is underway at present for Manawatū River Leader's Accord and Action Plan and Manaaki Taha Moana www.mtm.ac.nz.

Proposed amendments to the NPS-FM: accounting

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

Comment WE must know well who is taking what and at what volumes within regions.

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

Comment

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

However, its always difficult to fully assess the 'right balance' between prescribed and regional flexibility until the commitment gives rise to data and analysis.

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

Comment

If three can sort by 2014 others should not be far away by end of 2015, making water a high priority issue of their regions.

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)?

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

Proposed amendments to the NPS-FM: NOF attributes

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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? Yes

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? No

Comment Its time to act on best practice for all waterways, no more delays

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

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? Yes

Comment

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

Comment

as long as 'commensurate with the significance of the freshwater quality and freshwater quantity issues' does not assume that if it water quality is really polluted than we can forget about it energies spent to rehabilitate.

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? No

Comment

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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

ecosystem health and human health go hand in hand- if its not physical ill health with degraded waterways it will be spiritual or psychological dysfunction especially from Māori perspective.

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

Proposed amendments to the NPS-FM: National bottom line

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

Comment

Not greatly qualified to set numeric however the emphasis should be on solutions to 'additional algal and plant growth arising from nutrients levels that are elevated well above natural reference conditions'. We cannot be satisfied with moderate impacts.

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? Yes

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? No

Comment

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

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Comment

Currently Waiwiri Stream from Lake Papaitonga (Waiwiri) to sea has high levels of faecal contamination (ranging from cattle, human and bird) in water whereby shellfish are no longer able to be collected at mouth. No contact can be made with water column. See Cawthron and MTM report at www.mtm.ac.nz for more details on microbial source tracking.

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

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? No

Comment

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

Comment

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

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

Comment

Proposed amendments to the NPS-FM: Tūngata whenua values

38. Do you think the proposed NPS-FM adequately provides for Te Mana o te Wai? Yes

Comment

There is always room for improvement and expanded understanding. See research project Mankaai Taha Moana: Enhancing Coastal Ecosystems for Iwi and Hap? at www.mtm.ac.nz. Taking action for six areas of freshwater into the marine.

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

Comment

There is always room for improvement and expanded understanding. See research project Mankaai Taha Moana: Enhancing Coastal Ecosystems for Iwi and Hap? at www.mtm.ac.nz. Taking action for six areas of freshwater into the marine.

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

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Comment

It is vital that Māori values from freshwater are well recognised as they are often weighted against, or devalued by other interests and values taking precedence.

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?