

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? 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?

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?

Comment

Proposed amendments to the NPS-FM: accounting

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

Comment

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

Comment

In particular, councils should be able to catalogue for each dairy farm in their region the cow urine-N depositions based upon a mean urine-N value per cow per day to gauge the changes in likely diffuse N leaching arising from a change in animal numbers.

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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?

Comment

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

Comment

It seems overly generous in light of the rapidly decreasing state of our rivers and lakes currently. I suggest that time proposed be halved - this would bring home to all residents the urgency with which we as a nation need to respond to this.

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

A national set of values is imperative - but the bottom lines should be more conservative

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

I think that the ecosystem health is the best indicator of freshwater quality and that this should be the target for the NOF and be stated as such. It is essential that the state of invertebrate populations be included as the best canary in the cage indicator or target for improvements.

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? No

Comment

Should have invertebrate population densities as a measured attribute - see comments above. The following refer to Ecosystem Health proposed measurable attributes.

I disagree with the statements made. I submit that there are established scientific bottom lines for values that communities want for water quality - particularly when the aim is Ecosystem Health as the compulsory standard.

15. Do you agree with the numeric attribute states in appendix 2 of the proposed NPS FM? No

Comment

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In terms of the attributes in appendix 2, the proposed values are far too high in many instances and the minimum acceptable states should be lowered markedly.

Chlorophyll a in Lakes - The maximum proposed (60 mg/m³) is too large and should be lowered to 20 mg/m³ and other prior values lowered accordingly.

Total N in Lakes - the maximum should be lowered from 800 mg/m³ to 400 mg/m³ and all other prior values lowered accordingly.

Nitrate toxicity in Lakes and Rivers - National Bottom Line should be lowered from annual median of 6.9 to 3.0 mg NO₃-N /L and all other prior values lowered accordingly.

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

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?

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? No

Comment

I believe that the goal for the NPS has to be clearly stated as ecosystem health and primary-contact recreation - not with secondary-health contact or over-the-top minimum standards as goal. It is important to set the goal at the highest achievable level rather than at a compromise level if the public is to be motivated. Aim for the best not the worst because we know we can do it even if it is difficult.

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

Comment

This is a qualified yes and depends upon the regions and local councils being fully transparent and honest in all communications.

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? Yes

Comment

See above - absolutely essential - aim to be the best because it is achievable. Recently, I visited Zurich and was amazed at the supreme quality of the river now flowing through the centre of the city - once it was a mess but good regulations and community support has enabled this river to be an achievable and (at present) aspirational target for New Zealanders to aim for.

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

Comment

Of course, but only as a stepping stone towards ecosystem health of freshwaters - not as an ultimate target in itself. Compulsory values such as this should be strongly enforced as an aid to preventing further degradation and pollution of freshwaters while we reverse the degradation which currently is increasing.

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? Yes

Comment There has to be measurable attributes so progress can be monitored

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

Many of these values appear to me to be rather lax even as a first step. I think that there is good scientific information - particularly from overseas studies - which can give a good indication of levels that need to be achieved and can be achieved

Chlorophyll a in Lakes - The maximum proposed (60 mg/m³) is too large and should be lowered to 20 mg/m³ and

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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

The proposed timeframes already allow for this to occur so why do we need an extra transition. Transition periods have been shown to be highly mis-used by industries in NZ. As an example, consider the Clean Streams Accord between Fonterra and farmers. After 10 years of public-relations bumpf about concern for our rivers, and with rivers increasingly showing degradation from farm inputs, about 40% of farms were found by an independent investigation to not meet the industry goals - the public now realise the Accord was a sop to allow water pollution to continue without any enforcement or real effort by the industry to prevent it. So no need for transitions because the industries cannot be trusted.

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

No exceptions and this includes urban waste and sewerage treatments. The natural instances of water pollution from indigenous bird colonies are very rare indeed - a red herring in my opinion to distract the public from agricultural pollution.

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

Comment

Let us not look for exceptions - lets look for inclusions rather than be distracted by super minor issues to distract or alarm the public - sounds like the farming lobby again.

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

Dams and irrigation systems and urban waste treatment systems and geothermal developments and pulp and paper mills etc should all conform to regulations to allow us all to enjoy and have access to fresh water systems.

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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

If despite my comments above, there are to be exceptions, they must be examined in parliamentary debates - bring some sunlight into the discussion rather than hide in regional council minutes.

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? No

Comment Not allowed - no exceptions for intensive dairy farming.

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?

Comment

39. Do you agree with the way tūngata 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?

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?