

# 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

Telephone

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? No
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?

Comment

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

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?

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Comment

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

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?

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?

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?

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

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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? Yes

Comment And use of terminology is highly misleading

## 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

## 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?

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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?

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?

Comment

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

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?

Comment

35. Do you agree that freshwater management units eligible under the first two exceptions above should be decided by regional councils?

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?

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?

Comment

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

Comment

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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?

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? These proposed changes to the National Policy Statement for Freshwater Management are inadequate and set standards to low.

Ensuring rivers are clean enough to swim in should be a compulsory national standard for councils, not optional. E coli (or faecal coliform levels) which are safe for boating and wading are too high for rivers and lakes to be clean and safe for swimming. The compulsory national value for human and ecosystem health should be swimmable rivers.

Too many recognised water quality indicators are missing. If councils don't have to monitor these indicators then New Zealanders won't get an accurate understanding of the state of our waterways.

Fill the gaps in by including these national indicators ("attributes") for human health:

Water clarity.

Periphyton cover which is a measure of how much algae, bacteria and detritus is covering the river bed.

The indicators ("attributes") for ecosystem health should include:

The Macro-invertebrate Community Index which is a well-used and understood measure of river and stream health to monitor changes in the number and diversity of aquatic insects such as mayflies and caddisflies.

A limit on nitrogen and phosphorus as nutrients. The proposed bottom line for nitrate is the level where it is toxic to fish and other aquatic life. This will not prevent nuisance algal blooms.

A limit on deposited sediment. Soil belongs on the land not in rivers. Sediment smothers spawning areas and habitats.

A measure for dissolved oxygen across a river, not just in relation to point source discharges. Dissolved oxygen is critical for life and can vary hugely between day and night.

Measures for estuaries. Estuaries are vital as fish nurseries and pathways and have important recreational and cultural values.

The proposed exceptions to the national bottom lines are too broad and would allow further pollution. Limit the exceptions to specific water bodies and list these in the National Policy Statement

One certain way to help protect our rivers is to ensure that we look after them and that the water is clean enough for swimming, not just wading or boating. Human healthy and our economy depend on safeguarding our environment.