

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 Philip

Surname Armitage

Email [withheld]

Organisation

Telephone [withheld]

Address [withheld]

I give permission to publish my details Yes

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?

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

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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?

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

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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

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

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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?

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?

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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?
I have not answered the questions because I am unqualified to answer them, BUT, my concern at the state of our fresh water resources was heightened by a recent visit to the Taieri River in the Maniototo region of Otago..

Back in 1983 I spent three months in the Maniototo region working on the tunnel forming part of the power and irrigation system. On my days off and in the late spring evenings I would fish in the Taieri river mainly in the reaches close to Patearoa. The river would flow slow and calm, deep and clear, and then closer to Waipiata the character changed with the shingle bed. It was wonderful water and the fish plentiful and well conditioned.

Just before Christmas I returned to the area to show it off to my wife, and to allow her to experience the fishing conditions I had so much enjoyed.

Boy were we in for a disappointment. I am not against the odd dairy farm here and there, nor am I against irrigation per se when used responsibly. To tell the truth the air stank of cow shit. The super-sized dairy farms had queues of cows awaiting their turn at the sheds. Down to the river we went and what a disappointment. I can only estimate the relative flows between the 30 years, but maybe it was a third of what it had been. Green slime filled the river bed and each cast the spinners quickly were weed clogged. Miserable looking perch would sometimes bite, but not the 2 and 3 kg brown trout I had expected. Down near Waipiata, the low flows trickled down the riffles and globules of fat floated on the water. I saw a trout but it was small and ill conditioned. I didn't fish.

Ironic that the project I worked on helped transform the river into a mere shadow of what was once only 30 years ago.

You need to do something to reverse what is happening. And that is all over New Zealand.

I used to fish the Wainui-o-mata river near Wellington. I loved the lowland water close to the sea. I would regularly catch 1 or 2 trout over an evening or morning session and would see many more. I seldom go there now, the river has degraded that much. When I do go, I seldom catch anything and my wife who considers brown trout her favourite fish to eat, doesn't often get to eat one.

So, the order of the day is. Set a bottom line and that must be better than what we have now. Legislate to raise the water quality standard. Prevent over nutrification. Prevent stock accessing the waterways. Monitor to ensure standards are kept and have proper system in place to make sure that those who pollute/enrich no longer do so.