

# 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 Bob

Surname Brathwaite

Email [ withheld ]

Organisation [ withheld ]

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? 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? Yes

Comment Only partly. Impacts on fish and other fauna need to be included.

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

Comment Yes provided the basic scientific studies are available for guidance

5. Is there another solution to the problems? Why would that be preferable? No

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

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

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Comment

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

Comment 2 years is too long. One year should be sufficient

## 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)? No

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

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? No

Comment Nitrate toxicity levels are too high in States B and C.

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? 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

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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? Yes

Comment

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

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? 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 Only limited discretion should be allowed

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

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

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? No

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

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

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Comment Nitrate toxicity levels may be too high

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? Yes

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

Comment

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

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?

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? Yes

Comment

## Other comments

42. Is there anything else you would like to tell us about the issues and proposals in this document?