

Eel Enhancement Co Ltd (EECo)

Representing the North Island Eel Industry

4 February 2014

Freshwater Reform
Ministry for the Environment
PO Box 10362
WELLINGTON 6143
watersubmissions@mfe.govt.nz

Revision of NPS Freshwater

Thank you for the opportunity to comment on the discussion document 'Proposed amendments to the National Policy Statement for Freshwater Management 2011'.

The Eel Enhancement Company (EECo) represents the interests of the North Island Eel Industry with some \$10 million in annual value, many jobs and also significant development potential.

Eels and thus our EECo interests are certainly suffering from the past several decades of increasing burdens on NZ waterways, notably and especially from Dairy intensification. NZ must achieve much better outcomes (not just improve our efforts) for our fresh waters. EECo submits as follows.

1/ EECo supports the measures outlined to improve freshwater quality and quantity. EECo seeks that the NPS revision include measures for;

- **Improving rather than allowing the option of just overall maintaining attributes**
- **Immediate implementation as key variables eg Sediment have not even been covered yet, and may not be for a further 5 years, and catchment limits are not due until 2030 which is far too much time hence.**
- **Groundwater, Estuarine and Coastal water controls including because they are very important for NZ freshwater fishes and fisheries.**
- **EECo supports the submissions of the S. Is. Eel Industry Assn & Seafood NZ.**

2/ EECo notes that the NPS is seriously limited by its focus only on freshwater and its omission of consideration of the quality and quantity of freshwater-ways and associated aquatic habitat. This is likely to be an even more significant attribute than water itself, for freshwater aquatic species, and for many freshwater-related social and economic values. Our waterways have been and are still being, very significantly; dammed, weired, straightened, channelized and stop-banked, de-vegetated, flap and flood gated, pumped, plus with adverse flow regimes eg against all flooding which stops much Eel feeding and stops redistribution of many water pollutants eg sediment back onto the land and to then cause coastal water pollution.

EECo seeks that the NPS revision include measures for;

- **Encouraging assessment and the Accounting's consideration of (as presumably regulating would be seen as a step too far at this stage) the quality and quantity of freshwater-ways. This can sit alongside and will greatly improve the accuracy and value of, the proposed freshwater Accounting system.**

Yours sincerely

[withheld] Chair, EECo.

**Eel Enhancement Company Limited,
Directors;**

[withheld]
[withheld]

**Secretary;
Address;**

[withheld]

[withheld]