

18 February 2014

Freshwater Reform
Ministry for the Environment
PO Box 10362
Wellington 6143

Our Reference: qA7653

Enquiries to: [withheld]



environment
SOUTHLAND

Te Taiao Tonga
[withheld]

Dear Sir

Proposed Amendments to the National Policy Statement for Freshwater Management 2011

Environment Southland has contributed to the collective local government submission prepared by Local Government New Zealand (LGNZ) and is supportive of its approach and content. Estuaries are referred to in the LGNZ collective submission and their inclusion is supported. Environment Southland would like to make the following additional comments with respect to estuaries and the Proposed Amendments to the National Policy Statement for Freshwater Management, 2011.

Environment Southland acknowledges estuaries fall under the jurisdiction of the New Zealand Coastal Policy Statement, 2010. However, Environment Southland takes a 'mountains to the sea' approach to water management. As a result, estuaries are an important component of Council's response to implementing the National Policy Statement for Freshwater Management (NPSFM). The proposed inclusion of freshwater connections to coastal water in Policy A1, Policy B1 and Policy C2 are noted and supported. However, it is considered that these connections should also be recognised in section CA of the NPSFM. A new clause should be included in Policy CA1(f) which explicitly requires the consideration of implications for coastal water quality arising from the choice of freshwater objectives, for example as follows:

Policy CA1(f). Considering the following matters at all relevant points in the process described in Policy CA1(a)-(e):

...

- viii. any implications arising from the choice of freshwater objectives and associated limits on coastal water quality, in particular the health of estuaries.*

The table of proposed and potential attributes (page 21) indicates that attributes may be included in future amendments once the science is agreed. Environment Southland seeks 'Estuaries' to be added to this table and priority given to developing attributes based on contaminant loads for estuaries, whilst it is acknowledged this transcends jurisdictional boundaries it is considered appropriate given the dependant relationship estuaries have with freshwater



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inputs. In the interim the suggested addition to policy CA1(f), and the inclusion of direction for regional councils to have regard to coastal water when setting objectives for their freshwater management units in line with the collective LGNZ submission is supported.

Environment Southland acknowledges these comments are outside the formal submission period, having closed on February 4. However, upon final review of the LGNZ submission and the importance of estuaries within Southland it was considered important to reinforce, and expand upon Council's position.

Yours sincerely



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Chief Executive

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