

Submission on the Proposed Amendments to the National Policy Statement for Freshwater Management 2011 – National Objectives Framework

[withheld]

Fish and Game Officer

[withheld]

1. Fish and Game - Nelson Marlborough has a statutory function under Conservation Act to “*manage, maintain and enhance the sports fish and game resource in the recreational interests of anglers and hunters*”. It is a user pays system – funded by licence sales
2. While the introduction of a National Objectives Framework (NOF) through changes to the NPS Freshwater Management is broadly supported, the Nelson Marlborough Fish and Game Council (NMFGC) believe a number of the proposed ‘National Bottom Line’ values are inadequate to protect and maintain water quality suitable to be able to support both aquatic life and contact recreational values.
3. The NPS-FM should be aiming at maintaining and improving water quality and it should be mandatory that our rivers are suitable for contact recreation, rather than the proposed National Bottom Lines such as 1000 E. coli/100ml making them only suitable for wading and boating. In fact not only are the proposed ‘National Bottom Lines’ unlikely to result in the stopping and further degradation of NZ’s rivers and streams, but ironically they could cause a further decline in water quality due to the ‘National Bottom Lines’ being less than the current situation.
4. Given a number of Regional Plans are currently being prepared or contemplated, time frames, objectives and limits for some of the water bodies and attributes (such as Groundwater, sediment, temperature, invertebrates, fish etc) are either lacking or too far off. It is also uncertain when further changes would be made as new science information become available. As a consequence, by the time limits are put in place it is likely many of NZ’s water bodies will be further degraded.
5. In the NPS-FM discussion document, it is also unclear on how cross boundary differences / decisions will be addressed. For example, decisions made by one community/ regional council has the potential to dictate water quality attributes for others downstream, which may have aspirations for better water quality. Therefore it is suggested that management needs to be implemented at a water body scale, rather than by ‘freshwater management units’/regional council boundaries.

6. Given the sensitivity of the coastal environment and estuaries in particular from cumulative impacts upstream, it is unclear what the proposed timeframe is for additional values and attributes to be incorporated in the NOF as technical work is completed. It also raises the question, what happens if it is found that the current proposed freshwater limits/values are inadequate to protect and maintain estuary values?
7. It is submitted significant changes to the proposed NOF are required to enable it to operate effectively and give effect to these intentions, which include the following:
 - a. The NOF must better provide for water quantity management.
 - b. A banding approach is supported to define and ensure that water quality in a water body is maintained or enhanced. It is inappropriate to allow water quality to drop from relatively pristine A band to a point just above the D band, for example.
 - c. Provision for human health requires more than just for secondary contact recreation.
 - d. Life supporting capacity should be set at an appropriate threshold to support life; not the near avoidance of death. Toxicity is an inappropriate threshold to support life.
 - e. Thresholds and limits must be appropriately set to ensure that freshwater objectives will be met.
 - f. Limits to protect water bodies must be implemented at a water body scale, rather than through 'freshwater management units'.
 - g. Provision for 'exceptions' should be very limited in scope with decisions on whether these are appropriate for a national framework decided at the national level.
 - h. Where national numerical standards are not available yet, narrative standards should be provided to provide clear guidance for regional councils to be obliged to develop numerical standards as appropriate for their catchments or water bodies.
 - i. The Macroinvertebrate Community Index (MCI) or a similar metric should be included in the NOF.
 - j. A deposited sediment metric is recommended for inclusion in the NOF.
 - k. A groundwater nitrate toxicity metric is recommended for inclusion in the NOF.

- l. Urgency is required to complete and implement standards within the NOF for fisheries and estuaries.
- m. Objective B1, Water quality – needs to safeguard the life-supporting capacity of ecosystem processes, indigenous species **and trout and salmon**