

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 Ken

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Organisation

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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? Yes

Comment

I just read a document from The University of British Columbia which outlines 9 points that must be considered when dealing with freshwater ecosystems.

<http://news.ubc.ca/2014/01/31/nine-steps-to-clean-water-and-healthy-fish/>

Perhaps we need to work with existing research throughout the world rather than trying to re-invent the wheel.

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? Yes

Comment

Just set minimum standards for waterways based on the quality of the water at source. There is no need (other than cost and convenience) to discharge waste and sediment into our waterways. This would mean we have baseline values which would allow us to judge the degree of degradation, the cause of degradation, and define the actions necessary to correct the degradation.

Proposed amendments to the NPS-FM: accounting

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6. Do you agree with requiring councils to account for all water takes? Yes

Comment

We need to centralise records from all councils to see which councils are failing in their duties.

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? No

Comment

I think allowing regional "flexibility" is going to lead to continued degradation. Some councils already demonstrate a reluctance to enforce current rules.

9. Do you think the time period allowed for councils to develop accounting systems is appropriate? Yes

Comment

Only if they do not have systems that can be adapted, and it would be a good idea to have a system which is the same for all councils to allow collation of data.

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)?

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? 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?

Comment

15. Do you agree with the numeric attribute states in appendix 2 of the proposed NPS FM? Yes

Comment

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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

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? No

Comment

In theory it sounds good, but we are dealing with elected personnel, not trained professionals. The language is not specific enough. Councils can easily avoid taking action by simply pushing out the time scale for meeting objectives. Water quality shouldn't be tied to community "values"; it is necessary to set values based on the quality of the source water.

20. Do you think the process outlined will work? If not, why not? No

Comment

Again there is no requirement to act to bring water quality back to an acceptable level.

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? No

Comment

The water quality when man first arrived was first class (except for water from thermal areas). Why can we not have water quality measures that ensure the highest water quality possible? We know which rivers and lakes are in trouble. We know why they are in trouble. Let's do something concrete about it - now.

23. Do you agree that regions should have discretion to determine timeframes for meeting freshwater objectives? Yes

Comment

Within reason. If one regional council can achieve an objective in a shorter time than another council with the same

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problem then action would need to be taken to find out why there is a discrepancy.

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?

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 These values would have to relate to the quality of the water at source.

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

Comment No rivers or lakes should breach the bottom lines.

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? No

Comment

Most bodies of water are likely to be exposed to human activity. Bottom lines need to be high. The problem is having waterways contaminated with Giardia or Cryptosporidium. The public need to be notified of such contamination.

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 We have known of these problems for decades. We need to start acting now.

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? Yes

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Comment Thermal springs. Natural heavy metal contamination.

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

Comment Unfortunately we will have to wait for new technologies to solve these problems.

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? Yes

Comment

If the structure is artificially made and is not part of a natural water system.

35. Do you agree that freshwater management units eligible under the first two exceptions above should be decided by regional councils? No

Comment We need a national body to decide this - preferably made up of scientists.

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

If the structure is artificially made and is not part of a natural water system.

Proposed amendments to the NPS-FM: T?ngata whenua values

38. Do you think the proposed NPS-FM adequately provides for Te Mana o te Wai? Yes

Comment

39. Do you agree with the way t?ngata whenua values are described in proposed appendix 1 of the NPS-FM?

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? Yes

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

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