

Submission on proposed amendments to National Policy Statement for Freshwater Management 2011

General comments.

We are not happy that the National Policy Statement is being comprehensively revised only two years after its promulgation. As taxpayers we expect better drafting of such documents in the first place and are angry that yet more time and our taxes are now being spent on shuffling the words.

The problem of our polluted waterways is not new and the solution is patently obvious. The people and/or businesses responsible must stop polluting and this can be achieved by fining polluters so heavily that it becomes cheaper for them to treat their waste water than to pay the fine. This method has worked in England and Germany. New Zealand must not become the old East Germany of the South Pacific – we do not have a wealthy neighbour who can come to our rescue.

Progress on implementing standards that will return our waterways to what we can remember in the mid-1900s is glacial. In our opinion too much notice is being taken of vested commercial interests.

The National Policy Statement (in both original and proposed amended form) is verbose. The writers of the National Policy Statement should be made aware that Albert Einstein's Nobel prize-winning paper on the General Theory of Relativity, arguably the most complex and important concept in physics, was just 46 pages long (B4 size, English edition and 52 pages in the original German) in *Annals of Physics* (1916).

A number of proposed changes are merely "shuffling the deck chairs on the Titanic". For example: substituting "significant values" for "quality", and "freshwater management unit" for "water body".

Specific comments

The time allowed for fully implementing the standards (31 Dec. 2030) is far too long. It should be 2020. We get the impression there is little sense of urgency in the matter of our fresh water pollution problem. We need strong and effective action starting now.

The proposed Human Health standard for *E. coli* is far too low. We believe that every citizen of this country should be able, without risking adverse health consequences, to drink, swim and enjoy the water in every public place. Of course there will be some exceptions such as near places of natural pollution (seagull colonies, natural geothermal water discharges, and water supply streams and dams). The National Policy Statement should clearly reflect this and it should take effect by 2020 at the latest. There should be no acceptance of the lower standards associated with "secondary contact".

There need to be national bottom lines (minimum acceptable states) for water quality with local values above this. Such thresholds need to be set high rather than low,

otherwise existing values will be allowed to decline. Furthermore there needs to be a requirement for regular increase in local minimum acceptable states.

Monitoring is vitally important but “the devil is in the detail”. Having independent experts to decide where, when and how monitoring is done is crucial. User (self) monitoring often leads to poor, unreliable and useless data being gathered. One of us has seen this occur in the monitoring of geothermal systems: sites being selected which will show little change, reduction in the number of sites or frequency monitored to reduce costs etc.

The National Policy Statement should clearly state that no farm animals must have direct access to waterways. We understand that at present dairy cows are prohibited (under a variety of accords) but there are no regulations regarding beef cattle and other stock. This “loophole” needs to be closed.

Answers to your questions.

We have difficulty in answering some questions because we do not have the expertise needed and also have not had the time to investigate some matters in depth – for these we put N.C (no comment).

1. Yes
2. N.C.
3. It may do.
4. N.C.
5. N.C.
6. Yes
7. Yes
8. N.C.
9. No – far too long.
10. Yes, but should apply to primary contact (not merely secondary).
11. N.C.
12. No.
13. Yes.
14. N.C.
15. Yes.
16. No. National Policy bottom lines are too low.
17. Yes.
18. No.
19. N.C.
20. N.C.
21. N.C.
22. N.C.
23. Yes, but not beyond 2020.
24. N.C.
25. Yes.
26. Yes, but should also apply to primary contact.
27. N.C.
28. Yes.
29. No. Most appear to be at current levels.

30. No. Should be higher.
31. No.
32. Yes. An exception might be close to natural geothermal discharges.
33. Yes, but only for existing geothermal power plants and hydro-electric dams.
Any future projects should only be allowed if they can work within the bottom lines set.
34. Yes, but only under exceptional circumstances and for a short time.
35. No. This is a **National** policy statement, and such values and limitations should be decided by central government based on advice from independent scientists.
36. Yes.
37. N.C.
38. N.C.
39. N.C.
40. N.C.
41. Yes.
42. N.C.

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[withheld]