

Date February 4<sup>th</sup> 2014

TO

*Hon. Amy Adams*

Water Submissions

Ministry for the Environment

PO Box 10362, Wellington 6143

Dear Minister,

**SUBMISSION: Proposed amendments to the National Policy Statement for Freshwater Management 2011**

The National Wetland Trust supports a number of the proposed amendments to the National Policy Statement for Freshwater Management 2011. NWT also endorses the submissions of the Environmental Defence Society of New Zealand, the New Zealand Freshwater Sciences Society and the submission of the Land and Water Forum.

The National Wetland Trust is a non-profit organisation established in 1999 to increase the appreciation of wetlands and their values by all New Zealanders. Our first major task is to build a wetland interpretation centre for people to learn more about wetlands and experience their special qualities.

Other Trust aims are to:

- Increase public knowledge and appreciation of wetland values
- Increase understanding of wetland functions and processes

- Ensure landowners and government agencies commit to wetland protection, enhancement and restoration

The National Wetland Trust has been appointed the NGO co-focal point for the Ramsar Convention in New Zealand by the Department of Conservation (the government's administering body for the Convention), and is a member of the World Wetland Network – an international watch-dog that aims to ensure implementation of the Ramsar Convention<sup>1</sup> obligations by contracting parties (including the New Zealand government).

NWT wishes to highlight specific concerns regarding the protection of wetlands and estuaries. The National Wetland Trust wishes to promote the role that wetland protection and restoration can have in improving the water quality of our rivers, lakes, streams and estuaries.

1. NWT is concerned about the definition of Freshwater management unit (“FMU”) and that it may be used to obscure problem areas within catchments unless more specific guidance is given. For example, a council that is being pressured to develop a large water storage scheme may choose a FMU that is too large to allow impacts on individual river reaches or wetlands to be properly identified.
2. NWT opposes the goals for freshwater quality being an ‘overall’ requirement and requests that ecosystem health be at least maintained and improved.
3. NWT seeks the amendment of Policy CA1(d) to ensure that an attribute state equal to or above the current state is assigned for water bodies currently above the national bottom line.
4. NWT seeks that numeric attribute states and national bottom lines are set at levels which will prevent large contaminant loads being discharged from freshwater bodies to the coastal environment.
5. NWT seeks the insertion of a maximum timeframe for achieving national bottom lines of 20 years
6. NWT seeks the amendment of the attribute states for lakes to account for different lake classes

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<sup>1</sup> Convention on Wetlands of International Importance especially as Waterfowl Habitat, 1971



7. NWT seeks that numeric attribute states and national bottom lines are set for wetland environments wherever possible.
8. NWT submits that where information is insufficient to achieve point 6, that research is supported to fill the gaps in knowledge as soon as possible to improve the robustness of the policy approach.

The National Wetland Trust is grateful for the opportunity to make comment on the proposed changes.

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Chairman  
National Wetland Trust

Contact details for submission:

[ withheld ] Executive Officer, National Wetland Trust

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