



NEW ZEALAND ECOLOGICAL SOCIETY

Hon Amy Adams & Hon Nathan Guy
Freshwater Reform
PO Box 10362
Wellington 6143

4 February 2014

Dear Ministers,

FEEDBACK ON THE PROPOSED AMENDMENTS TO THE NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT (2011) AND THE NATIONAL OBJECTIVES FRAMEWORK

Introduction

The New Zealand Ecological Society (NZES) was formed in 1951 to promote the study of ecology and the application of ecological knowledge in all its aspects. The NZES is New Zealand's leading professional society for pure and applied ecology and publishes the New Zealand Journal of Ecology, which is the primary peer-reviewed publication for ecological science and research in the country. The NZES currently has a membership of 596, many of whom are directly involved in resource management and are familiar with the many challenges of this field. Many of the NZES members have provided expert evidence in the Environment Court during plan and resource consent hearings, and a number are accredited independent commissioners under the 'Making Good Decisions' programme. The NZES and its members regularly make submissions on matters of public interest that have important ecological dimensions. Through the submission process and the society's other activities, the NZES aims to promote sound ecological planning and management of the natural and human environment.

The NZES has a close relationship with the New Zealand Freshwater Sciences Society (NZFSS), the key professional society for practitioners in freshwater science and management in New Zealand. A number of practitioners are members of both societies and the management of our freshwater resources and ecosystems is an issue that unites the societies.

The NZES welcomes the opportunity to comment on the '*Proposed amendments to the National Policy Statement for Freshwater Management 2011*' (NPS FM) and the National Objectives Framework (NOF). In addition to this submission, members of the NZES have contributed to the submission from the NZFSS.

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The NZES **adopts the submission of NZFSS in its entirety**. The NZES also makes brief comments below on ecological matters of particular relevance to the Society's objectives.

National Objectives Framework

1. The NZES **supports** the concept of a national objectives framework and that a national approach is the appropriate response to the current state and trends in New Zealand's freshwater quality and aquatic biodiversity. The NZES endorses the statements of concern made by the NZFSS in particular:
 - That minimum bottom lines should not be confused with objectives, the first being minimum thresholds and the second are states to aspire to. Policies should not be developed that set minimum bottom lines as the target to attain.
 - That the NOF should re-emphasise the 'maintain or enhance' approach of the NPS FM Objective A2.
 - The policy framework should ensure that no water body is allowed to degrade or worsen.
2. The NZES is concerned that appropriate bottom lines for estuaries have not been included in the NOF framework. Estuaries are highly ecologically important ecosystems providing a raft of ecosystem services (including protection of human settlements, provision of food and raw materials, and recreational pursuits) and habitat for species (including specialised wetland species, migratory species, threatened species, and culturally significant species). Estuaries are also highly vulnerable to the detrimental impacts of land management practices and poor water quality.
3. The NZES submits that estuaries should be provided for within the NOF. The NZFSS submission provides sound recommendations to this end.
4. The NZES agrees with NZFSS that natural character should be a compulsory national value within the NOF. Natural character of rivers includes the geomorphology of the river, (pools, runs, riffles, sediment transport, active channel width) and connectivity with the floodplain, wetlands and downstream systems. Natural character also incorporates the natural hydrological regime, riparian margins and water quality attributes. Therefore, providing for natural character by default incorporates critical ecological processes to occur by providing for functioning ecosystems and connectivity between terrestrial and aquatic ecosystems.

The safeguarding of Ecosystem Health, Human Health, and Te Mana o te Wai (Objective A1)

5. Along with the NZFSS, the NZES **strongly support the definition of compulsory values for Ecosystem Health and Human Health and support and endorse the inclusion of Te Mana o te Wai as a compulsory value and an objective within the NPS FM** on the basis that identification of these three compulsory values within the NPS FM will assist Regional Councils and communities to better prioritise outcomes for freshwater when creating plans or setting limits.
6. National objectives to safeguard Ecosystem Health, Human Health, and Te Mana o te Wai will also contribute to the long-term protection of natural capital and the sustained functioning of ecosystems. This is critical for the continued provision and flow of

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ecosystem services, upon which our environmental, social, and economic wellbeing is utterly reliant.

Addition of the term 'significant values' to Objective A2(a) NPS FM

7. The NZES agrees with the NZFSS that the addition of the term 'significant values' into Objective A2(a) without providing a definition of what such values are will add a further layer of burden of proof on regional councils to justify the protection or recognition of values they identify to be significant.
8. The exclusion of a definition for 'significant values' will likely eventuate in a continuation of case-by-case arguments swayed by subjective policy and political decisions at the expense of objective ecological definitions. This situation has occurred time and time again in regards the identification of 'significant indigenous vegetation and habitat of indigenous fauna' under s6(c) of the Resource Management Act 1991 (RMA).
9. The failure to provide a minimum definition of 'significant values' can result in these very same values being excluded from recognition or protection under regional plans and a continued decline in the state and trend of New Zealand's freshwater and aquatic biodiversity.

Lakes and wetlands

10. The NZES submits that the ecological importance of wetland and lake ecosystems and their contribution to indigenous biodiversity and ecosystem function be recognised. The vulnerability of these ecosystems to continued decline due to detrimental impacts of land use practices must be provided for in the NPS FM and the NOF. The NZES endorses the recommendations of the NZFSS to this end.

The NZES would like to reiterate that in addition to the above comments, we fully adopt the submission of the NZFSS in its entirety.

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For the New Zealand Ecological Society

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