

Ian Price

[withheld]

Water Submission to the Ministry for the Environment

- A national Policy Statement for Freshwater Management in NZ is of the highest priority
- A statutory requirement for Councils to have set Freshwater Management objectives by 2030 is an irresponsible time frame when our Freshwater ecosystems are presently in crisis due to pollution and demand. Why such a time frame when three councils have indicated they hope to have their management objectives completed by 2014?.

Sect 4.1

6. Yes, a statutory independent body must be responsible for accounting for all water taken.

7. Yes, Councils as statutory independent bodies have the ability to account for all sources of contaminants.

8. From a laymen's perspective I would say yes, once a policy statement was implemented, one would expect a procedure would be available to remedy any issues if problems did arise.

9. It would appear, 2 years is a long period of time for Council to complete the recording process, one would expect opportunities would be available to reduce this time frame.

4.2 Values

This is a complex one, the concern I have, if one becomes overly prescribed in defining values, then the opportunities for opting out from improving water quality increases. Where you rank/prioritise water systems leaves the procedure vulnerable to legal interpretation resulting in delays in implementing policy and the diluting of strong policy.

4.3

25. I strongly agree ecosystem health should be a compulsory value.

26. Human health must be a compulsory value.

Under the ministries proposals, minimum acceptable water quality status ("national bottom lines") for Human compulsory values has been classified as 'secondary contact' (boating or wading) buried within is another classification for Human Health as 'Contact recreation' (full emersion) a value defined at the discretion of local councils and the community.

I object in the strongest terms to a compulsory value (national bottom line) for fresh water quality as being only suitable for humans to boat or wade in.

Compulsory Value (national bottom line) for both Human and Ecosystem health should be 'Contact recreation' value.

27. Compulsory value been given numerous rankings is there for the purpose of mitigating the impact of the polluters at the expense of the well being of the community and the environment. The negative impact a business has on the environment should be reflected as a cost of running this business, not a cost borne by the wider community.

I believe compulsory value rankings should be reduced, the compulsory value ('national bottom line') for fresh water management should be set at **Human Health contact recreation**.

4.4

28. I have expressed a real concern at an abdication of responsibility for improving fresh water quality when you have numeric bottom lines defining compulsory values. The results of greater numbers of 'numeric bottom lines' is a feeding frenzy for the lawyers, the classification system has to be kept simple and to a high standard, that is **Human Health contact recreation**.

29 As above

30 I object in the strongest terms that it will become acceptable as fresh water 'bottom line' for New Zealand that the fresh water quality standard in NZ will be only suitable for human boating or wading, this is abhorrent.

The bottom line for both Ecosystem and Human health for Fresh water in NZ should be contact recreation.

31. Yes, but to be prescribed in the shortest time frame- would have to be exceptional reasons for it to go beyond 2 years.

4.5

32 This is going to be a difficult one, the lawyers will love it. To allow fresh water quality to remain below a defined 'bottom line' due to 'existing significant infrastructure', what is 'significant infrastructure?', is the negative impact of this 'significant infrastructure' human induced, then if this is the case, serious thought must be given as to whether it should be allowed to continue and an expectation is for it now to be remedied.

The example was given of birds roosting over a water way resulting increased e.coli levels, the questions to be asked were humans responsible for habitat modification impacting on the birds?, human water extraction reducing water flows?, etc, a difficult one.

Such decisions would ultimately lie with councils; however prescribed national guidelines would have to be decided to give national consistency in decision making.

4.7

41. National and regional monitoring plans based upon good science are vital going forward in monitoring Fresh water health management. This will ultimately be the responsibility of Councils but strong, clearly defined expectations must be prescribed by central Government under the RMA.

Summary

I only became aware of the submission process in relation to NPS- FM in the past two weeks, for such an important process why was it released over the Christmas period with limited public exposure?. For a member of the public it takes time to work through such an important document and explore the ramifications of its proposals.

The effective implementation of a Fresh Water Management Plan to a degree will be dependent on a strong RMA, I have some real concerns as to the intentions of the National Government in regards the powers and responsibilities that are defined within the present RMA.

Fresh water health and resources are in crisis in New Zealand due to the demands of business (especially dairying industry) and an expanding population. We must set high standards in managing fresh water quality and supply by way of this policy document, if we miss this opportunity to set high quality standards for our fresh water resources, the future of all our environment and future generations that will inhabit it will be bleak.

Yours Sincerely

Ian Price