

# 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 [withheld]

Surname [withheld]

Email [withheld]

Organisation Ruahine river care group

Telephone [withheld]

Address [withheld]

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? No
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?

Comment

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?

Comment

## Proposed amendments to the NPS-FM: accounting

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

Comment Assessments rather than metering may be sufficient in many instances

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? Yes

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Comment

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

Comment

## 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? No

Comment

13. Do you agree with the descriptions of the national values in appendix 1 of the proposed NPS FM?

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? Yes

Comment

There is a need to be careful here.

If you include too many attributes, and certainly if those attributes are set at too high a level, there is the risk that one or more attributes may not be met

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

Comment

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? No

Comment

18. Or should the Government delay putting the NOF into place until a more comprehensive set of attributes has been developed? Yes

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Comment

There needs to be clear signals sent. There is nothing worse than shifting goal posts. What happens if a city builds a wastewater plant that is not compliant with NPS shortly after either the waste water plant is commissioned or the NPS has been updated?

Too many attributes run the risk of achieving some but not others. Keep it real!

## 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? Yes

Comment

20. Do you think the process outlined will work? If not, why not?

Comment

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? Yes

Comment

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

Comment

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? No

Comment

Ecosystem Health

How healthy can an ecosystem be when introduced Rainbow and Brown Trout are destroying its viability from the top down.

Sort out the RMA and the protection of Trout and Salmon and incorporate Fish and Games functions into the department of conservation

26. Do you agree that human health for secondary contact recreation (such as boating and wading) should be a compulsory value? Yes

Comment

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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? No

Comment

Full contact recreation would be ideal, but there needs to be an assessment on what "poor" water quality means in terms of human health.

Currently there is the perception that people WILL or are VERY LIKELY to get sick if they swim in water classified as unsuitable. The risk is very slight and as such needs to be communicated to the public.

Full contact recreation COULD set a ridiculously high threshold for very little additional benefit in terms of human health.

## Proposed amendments to the NPS-FM: National bottom line

28. Should there be numeric bottom lines for attributes of the compulsory values? Yes

Comment

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? Yes

Comment If the science believes these are suitable then they should be suitable

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? Yes

Comment

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? Yes

Comment

## 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

Comment

The Whangaahu river that drains Mount Ruapehu crater lake would naturally breach bottom lines if the wrong attributes were included.

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

Comment

The Manawatu rivers nitrate targets for the river may prove very expensive from a social and economic perspective.

Horizons regional council has already set limits for N in this river. Councils like Horizons (have done) need to move away from a limit to objectives and let science and technology provide the answers as to how to achieve these objectives while maintaining the social and economic integrity of the communities.

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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 What is significantly in the national interest needs to be catered for.

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

Comment  
These are in the national interest and best dealt with at a higher level of government

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 Of significant national interest

## Proposed amendments to the NPS-FM: Tōngata whenua values

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

Comment

39. Do you agree with the way tōngata 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?

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

42. Is there anything else you would like to tell us about the issues and proposals in this document?  
Ruahine river care represents farm irrigation in Southern Hawkes Bay.  
We are concerned about the definition of Objective B2 regarding over allocation of water and its phasing out.  
We are reasonably comfortable with the ability to trade entitlements (policy B3) but are concerned with the prospect of having entitlement withdrawn, as is implied in objective B2