

Fresh Water Reform  
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## **Rural Women New Zealand Submission to the Proposed Amendments to the National Policy Statement on Freshwater Management**

### *Introduction*

1. Rural Women New Zealand is a charitable member based organisation that reaches into all rural communities and advocates on issues that impact on those communities. It welcomes the opportunity to comment on the Proposed Amendments to the National Policy Statement on Freshwater Management. Rural Women New Zealand commends the Ministry for the amendments to the NPS.
2. Rural Women New Zealand recommends that a Rural Impact Assessment is applied to any inquiry, legislation, regulations, statements and policy. This will require close analysis of the issues that specifically impact on rural communities. An RIA will mean ensuring that the needs and interests of rural people are properly considered in the development and implementation of any changes that are brought about by the proposed amendments.
3. Rural Women New Zealand latterly participated in the Land and Water Forum and supports the more in-depth, more technical comments made in its submission to the NPS Amendments.
4. Rural Women New Zealand also consulted with its members by asking key questions. Their responses form the basis of this submission. Overall rather than comment directly on the amendments they expressed what they hoped and expected how the NPS would benefit their communities and where there concerns lay.

### *Submission*

- 5 95% of respondents agreed that the NPS should be amended to include a national framework to help regional councils and communities set freshwater objectives.
6. 100% agreed that ecosystem and human health (for secondary contact like boating or wading) should be a compulsory national value for water.

7. While 45% said yes and 55% said no to more compulsory values, it was felt that Freshwater Management, for all the prior work that has been done will continue to be a work in progress. It won't be known until benchmark standards are established, monitored, assessed and understood as to whether more compulsory values will be needed.

Additional comments were:

8. The compulsory values must be clearly defined for regional councils to set their own policies and rules within the NPS and reduce the current bureaucratic RMA processes and legal debate that traps communities at a regional/local level. It seems that layering more compulsory values on top of compulsory values that are not working as well as they meant seemed to be of concern to several respondents.

9. Respondents noted that very clear nationalised compulsory values with some flexibility to meet local needs were important as they were concerned that if the interpretation is left to the skills of local commissioners it will lead to unnecessary tension and inconsistencies. Presently for national interest groups to have to submit and often appeal plan changes multiple times to different regions is onerous and when summarised often show up wide inconsistencies. It is expected that any variations or additions will be in accordance with community wishes.

10. Less is more if the compulsory values are clearly articulated, recognise community values, create certainty, and as the NPS is tested more compulsory values are added and original values reviewed and improved as required.

11. 65% thought that there should be transitional arrangements. 35% told us it should not be necessary. Those in favour thought transitional arrangements could take from 6 months to 10 years.

12. We asked the members to describe where there should be exceptions to staying above bottom lines in some cases, for example the natural state of the water breaches bottom lines, where historic activities have created breaches which cannot be remedied, or where a choice has been made to manage water below bottom lines due to significant existing infrastructure such as dams.

55% of respondents agreed that there should be exceptions under the circumstances mentioned.

However there was concern that these exceptions could be exploited instead of investment in "setting things right". There was also concern that communities or individuals will not have the resources to challenge a decision where an exception has been granted let alone meet their own responsibilities.

13. Finally we asked our members to tell us about the issues that concerned them and that they hoped would be addressed by the National Policy Statement on Freshwater Management and its Amendments.

13.1 There was concern that exceptions to the bottom line will become normalised. That education was key. Personal responsibility was as paramount as regional councils interpreting and implementing their freshwater strategies to the letter/spirit of the Act. A question asked was how will Regional Councils compel District Councils to meet their obligations and will they have to?

13.2 Various stakeholder groups will see the issues differently and there was concern that the largest with the most could overwhelm the smaller more disparate community groups such as those from small rural areas.

13.3 A question was asked with regard to historic events/sites. What if new ones are discovered? What about new organisms or the rediscovery of organisms thought to be extinct? Who would hold the discretionary powers?

13.4 That all national standards must retain regional flexibility. It was recognised and accepted that the NPS-FM is part of the wider reform package and will include a suite of non regulatory tools. While many of the gaps are being filled by the amendment, there will always be more that the Ministry can do. Therefore the short implementation timeframe before the first review is welcome.

[withheld]