

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 Colin

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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?

A major problem is vesting control of freshwater resources with regional and local councils. In rural areas, the councils are heavily dominated by members of the farming communities who will act in the interests of farmers and not in the interests of the community as a whole or in the interests of users of freshwater resources for recreational purposes such as swimming and fishing. An example of this is the proposal to build a dam for farm irrigation in Hawkes Bay that will destroy the Tukituki River - once a prime trout fishing river before heavy dairy and agricultural pollution.

The above comment refers to the following stated policy:

"The NPS-FM also requires that councils safeguard the life-supporting capacity, ecosystem processes and indigenous species (including their associated ecosystems) of fresh water.

The proposed amendments will ensure that regional councils account for all water takes and sources of contaminants to inform decisions on the setting of freshwater objectives and limits."

Options for providing further national direction

3. Do you agree that amending the NPS-FM would solve the problems identified in section 2? No

Comment

Control still remains vested in local and regional councils who are heavily dominated by farmers and councillors owing or employed within agricultural industries who view freshwater resources as local assets to drive their farming and agricultural businesses. Other councils located in areas where forestry dominates - a major contributor to the degradation of rivers due to archaic clear felling practices - are likewise heavily represented by councillors connected with forestry industries acting with a vested interest.

4. If not, would additional guidance be sufficient to solve the problems identified? Yes

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Comment

Significant input into the quality of local freshwater resources should also be permitted by such national organisations as Fish & Game; the Department of Conservation (unfettered by Ministerial influence), Whitewater New Zealand, the Council of Outdoor Recreation Associations of NZ, the NZ Rafting Association, New Zealand Federation of Freshwater Anglers and local trout and salmon fishing clubs.

A sad example of where the interests of farmers and agricultural producers has dominated over the quality and availability of freshwater resources is the destruction of the Selwyn River in Canterbury which used to be a prime brown trout fishery. So much water is now pumped onto land converted for dairying upstream that the river is virtually non-existent most of the time with only a tiny flow actually reaching Lake Ellesmere (Te Waihora) in comparison to its past flows. With a reduced flow of fresh water from numerous Canterbury streams, Lake Ellesmere itself threatens to become New Zealand Aral Sea as a polluted saltwater body of water incapable of supporting fish life due to the significantly reduced flow of fresh water reaching the lakes from contributing rivers and tributaries. This situation obtains over numerous lowland parts of Canterbury and other New Zealand where other rivers are now deprived of an acceptable flow to sustain a good habitat of marine life.

5. Is there another solution to the problems? Why would that be preferable? Yes

Comment

The NPS-FM requires councils to manage fresh water efficiently within set limits and address over-allocation. Councils must manage land use and water in an integrated way. Councils must manage land use and water in an integrated way. They must also involve iwi and hapū in freshwater decision-making.

Another solution should be to deeply involve other organisations and their representatives in decision making processes who are vitally interested in the water quality of our lakes, rivers and streams other than local and regional councils and local iwi and hapū.

Once again recreational users and communities who are keenly interested in the quality of freshwater resources are left out of the decision-making process. The fact is that it appears that Government ministers along with corporate leaders of the farming and forestry industries, feel their right to use freshwater should be a priority because their uses "creates jobs" and contributes to the economy. However, it is forgotten that tourism is still New Zealand's biggest money earner with many tourists attracted by reports and promotion of New Zealand's pristine rivers abounding with trout and salmon. Sacrificing the quality of our freshwater resources to the gods of farming and forestry has already significantly diminished New Zealand's "Clean Green" and "100% Pure" image and will continue to do so - to the detriment of tourists and overseas anglers who pour millions of dollars into the nation's coffers.

Proposed amendments to the NPS-FM: accounting

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

Comment

Absolutely some agency should be charged with accounting for water takes, because "water takes" for agricultural purposes have already significantly reduced the flow of numerous rivers and streams to their detriment and their value for recreational and tourism purposes. I would dispute again that "councils" are the best to undertake this "accounting" due to the vested interests of many councillors in rural areas.

7. Do you agree with requiring councils to account for all sources of contaminants? Yes

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Comment

But once again, I would challenge that councils are the best to do this in view of the likely vested interest of councillors living in rural areas dominated by farming, agricultural and forestry industries.

The "contaminants" should also include the untold tons of soil, mud, silt, tree branches, bark and sizeable logs that turn many of our rivers into chocolate brown torrents after heavy flows of rain due to the clear-felling of entire hillsides bordering rivers and streams - often by foreign owned forestry companies. Such forestry industry "contaminants" not only smother the spawning redds of trout and native fishes but - in the case of large logs and branches - pose a huge danger to local bridges, downstream communities bordering the rivers, estuaries and beaches at the river mouths which are coated with millions of tons of forestry hillside muck and recreational craft which are threatened by floating logs and other debris.

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? No

Comment

The control and monitoring of New Zealand's fresh water resources should be undertaken at a national level by a neutral and unbiased body with national interests at heart and not by local councillors who have their vested business and industrial interests as a priority.

9. Do you think the time period allowed for councils to develop accounting systems is appropriate? No

Comment

The timeframe is way too long and, has been shown in many overseas countries, the degradation and recovery of polluted rivers and streams can be achieved within a few years by determined efforts by Government and regional officials.

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 There should only be a national set of values.

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)? Yes

Comment

One of the "national values" should be that all freshwater lakes and rivers and streams should be capable of supporting populations of trout. In addition, to the benefits to the tourism industry and recreational users, it should be appreciated that trout require one of the highest levels of oxygen intake of any freshwater fish species and have a low tolerance of contaminant pollutants. As such trout are prime "canaries in the coal mine" indicating the quality of fresh water sources. Waterways that will not support trout populations will be unfit for swimming, drinking (by campers etc) and other recreational and community uses.

12. Are there any values that should be deleted from appendix 1 of the proposed NPS-FM and why? No

Comment

If anything further stronger values should be added with the aim of zero pollution of rivers, streams and lakes by the farming, agricultural and forestry industries - along with any other industrial pollution. Likewise, a stable flow of

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all rivers and streams should be targeted rather than these being degraded by the over-use of freshwater resources for irrigation and other industrial purposes.

13. Do you agree with the descriptions of the national values in appendix 1 of the proposed NPS FM? No

Comment I think the descriptions needed to be stronger.

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? No

Comment I think the attributes need to be stronger.

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

Comment Not qualified to comment on technical data. I am not a lawyer.

16. Do you agree with the narrative attribute states in appendix 2 of the proposed NPS FM?

Comment As above

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

No because when the "adequate evidence" becomes available the damage to rivers, streams and other waterways has already been done. The aim should be for pure water for all rivers and streams free of man-made and agricultural and forestry and industrial contaminants - water that is capable of supporting populations of oxygen dependent trout and indigenous species.

18. Or should the Government delay putting the NOF into place until a more comprehensive set of attributes has been developed? No

Comment

No delay should be contemplated by Government in seeking to reverse the damage already done - and being done on a daily basis - to New Zealand's lakes, rivers and streams.

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?

Comment

To be honest this is getting too technical for me. I don't understand the question. I am not a lawyer

20. Do you think the process outlined will work? If not, why not? No

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Comment

No I do not think the process will "work" because Governments and councils will be significantly influenced by corporate and industrial backers and multi-national companies who will always believe that the Mighty Dollar comes before any environmental and recreational values. It will only work if freshwater policy is vested in a completely independent national agency with significant input from community and recreational users - and not be overwhelming influenced just farming, agricultural, forestry and industrial corporates.

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

To be honest this is getting too technical for me. I don't understand the question. I am not a lawyer.

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

Yes but this attitude should not be used to procrastinate or as an excuse for not facing up to the real issues directly and forcefully and quickly.

23. Do you agree that regions should have discretion to determine timeframes for meeting freshwater objectives? No

Comment

This should be driven by a national neutral and unbiased agency having the restoration of New Zealand's freshwater resources at heart and not left to councillors or members of regional councils or bodies who often have personal business and corporate issues as a priority in seeking to be elected or appointed to regional bodies.

24. Are there any aspects of the process that are not clear? Yes

Comment

The wording is quite technical and I am an ordinary Kiwi bloke and not a lawyer.

Proposed amendments to the NPS-FM: Compulsory values

25. Do you agree that ecosystem health should be a compulsory value? Yes

Comment

Yes an absolute priority and implemented as quickly as possible without procrastination.

26. Do you agree that human health for secondary contact recreation (such as boating and wading) should be a compulsory value? No

Comment

No I think that human health for swimming and safe drinking (after boiling) by campers, river rafters etc should be an absolute "compulsory value".

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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? Yes

Comment

A compulsory value should be that "all rivers, lakes and streams in New Zealand should be able to exist in relation to solid flow rates and support healthy populations of trout (as the 'canaries in the mine' in relation to their need for high oxygen levels) and indigenous fishes and be safe for humans to swim in and engage in other recreational activities including campers being able to drink boiled water from all lakes, rivers and streams."

Proposed amendments to the NPS-FM: National bottom line

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

Comment

To be honest this is getting too technical for me. I don't understand the question. But once again I would say that a compulsory value for all lakes, rivers and streams should be that they can support healthy populations of trout which are effectively 'the canaries in the mines' in relation to water quality because of their high oxygen requirement.

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? No

Comment

The bottom lines should be that all lakes and rivers and streams should be able to support healthy populations of trout (acting as 'canaries in the mines') and indigenous fishes.

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? No

Comment

The minimum level should be that 'human' children and adults should be able to swim and play in all New Zealand's lakes, rivers and streams without any threat to their health and that other recreational users such as campers and trampers should be able to drink water from New Zealand's lakes, rivers and streams after boiling.

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? No

Comment

No I don't think local councils and communities should be charged with anything because membership of councils and community boards etc is usually heavily weighted by local business people or representatives of farming and forestry industries with a vested interest in the user of freshwater resources.

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

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The best near Auckland example of "a freshwater management unit" breaching bottom lines is the Waikato River and the tributaries entering this key waterway below Hamilton and Ngaruawahia which is disgustingly polluted by agricultural and industrial waste. In the lower reaches the waters of the Waikato River system bear no resemblance to the turquoise headwaters pouring over the Huka Falls just below Lake Taupo.

Additionally, my family have been long time residents in the Nelson-Tasman region where the "formerly" pristine Motueka River and other rivers and their tributaries throughout the region are now heavily polluted by foreign owned forestry industries who are permitted to plant poisonous exotic pines etc right down to the river banks of rivers and streams and subject these to absolutely disgraceful pollution and degradation due to entire hillsides with forestry debris being washed into the streams and rivers following significant rainfalls on clear felled hillsides.

Where in your region do you think this type of exception might apply? No

Comment

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? No

Comment

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

Comment

They should be decided by a neutral and unbiased national body - like the Department of Conservation - acting in the best interests of the quality of freshwater resources throughout New Zealand and not by regional councils having an influential membership of local business people, farmers, agriculturalists, forestry employers and employees and representatives of Mighty Dollar First corporates and companies.

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

Absolutely the future and restoration of the quality of freshwater resources should be decided at a National - not a regional or local - level.

37. What should the criteria be for allowing exceptions based on significant existing infrastructure?

Comment

There should only be exceptions that allow sufficient time for any industry to completely eliminate the contamination and degradation of any and all lakes, rivers and streams.

Proposed amendments to the NPS-FM: Tŋgata whenua values

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

Comment Don't know

39. Do you agree with the way tŋgata whenua values are described in proposed appendix 1 of the NPS-FM?

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Comment

From my own experience in protesting the over-development of Kinloch subdivisions on the shores of Lake Taupo, the loyalties of local iwi can be "bought" by corporate and local body authorities.

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 Don't know

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?

Comment

Yes I support strict, rigid and unyielding monitoring of all freshwater resources by an independent national agency.

Other comments

42. Is there anything else you would like to tell us about the issues and proposals in this document?

My main concern is that the management and oversight of all freshwater resources in New Zealand should be vested in an unbiased and neutral National agency with a brief to restore all New Zealand's lakes, rivers and streams to a healthy and pristine condition capable of supporting trout (as equivalent to the 'canaries in the mines' due to their requiring high levels of water oxygen content and low toleration of contaminant pollution) and providing healthy environments for other marine life; and being safe for swimming, boating, camping and other recreational activities. This important role should not be designated to regional or local councils made up of people with vested business and corporate interests.