

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.

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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?

In Part.

Problems: The accountability of fresh water takes and the usage that is being consented. The accountability of the fresh water taken from Aquifers and Deep Water Aquifers. The ongoing Monitoring of freshwater that reports the polluters, the pollution types, the water quality etc... We also want to see introduced wherever there is discharge then it should be discharged first to a wetland area. The establishment of wetlands is important to improve water quality, if you improve water quality the 'mauri' of living things will certainly increase.

'Te Mana o te Wai' is a cultural view of freshwater which should be part of the NPS document rather than in an appendix.

Options for providing further national direction

3. Do you agree that amending the NPS-FM would solve the problems identified in section 2? Yes

Comment

In Part - A forum of council, community, scientists and tangata whenua to work together on how to implement the NPS - FM. This may alleviate tangata whenua concerns on 'Te Mana o Te Wai' being given some weight. Also a separate section that covers the types of monitoring.

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

Comment

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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

Yes we would like to see a review of how long the consents have been approved included. There should also be limits on how much these water takes can impact on the aquifers.

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

Comment

Account for all water sources of contaminants but also to be able to do something about the sources of contaminants especially if they are causing distress on the 'mauri' of the waterways.

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?

Comment

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

Comment

Yes a two year period is sufficient. Council should be required to achieve certain objectives within that timeframe.

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

Yes but not the way that has been set out in Appendix 1 currently. Its confusing how its been written. The concept behind Appendix 1 is correct but the wording in the document is not correct.

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

The anesthetic or look of the scenery or waterway is important. Also the 'smell' that is given off, these are not covered. For example:

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

Comment

The wording should be re-written because the M?ori concepts have not been captured correctly.

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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?

Comment

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

Comment

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

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?

Comment

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

Comment

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

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?

Comment

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

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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? Yes

Comment

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

Comment

Recreation should also include diving, surfing, or water sports. Not everyone in the community can afford a boat so why is 'boating' in the NPS.

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

Value to be able to drink fresh water from a stream without fear of contamination or risks to your health.

Proposed amendments to the NPS-FM: National bottom line

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

Comment

As long as we don't have to be a scientist to understand the numeric information.

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

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?

Comment In Part - Secondary contact could be improved. Delete boating.

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

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

Comment The lower Kaituna River Catchment.

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

Comment

The Kaituna River and Maketu Estuary have suffered as waterways from a historical decision made in 1957, made by the County Council at that time. They diverted the freshwater of the Kaituna River away from the Maketu Estuary. The waterways, the people, the ecosystems, the seafood, the fishes have all suffered because of the diversion of the freshwater. The regional council are progressing a strategy to finally redivert the Kaituna River back through the Maketu estuary after 56 years of suffering we want the NPS to have this rediversion project given priority.

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

Only if those infrastructure is built to accommodate the fresh water fishes such as eels when they are migrating upstream and downstream. We disagree there should be any damming in our area.

35. Do you agree that freshwater management units eligible under the first two exceptions above should be decided by regional councils? Yes

Comment

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

Proposed amendments to the NPS-FM: T?ngata whenua values

38. Do you think the proposed NPS-FM adequately provides for Te Mana o te Wai? No

Comment Confusing.

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

Comment

The writing of the Appendix 1 should be improved. Its confusing not the concept.

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?

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Comment We think 'Te Mana o Te Wai' can be including in the overall document.

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?
We would like to the Lower Catchment of the Kaituna River given some recognition in the NPS.