

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 The New Zealand Trade and Industrial Waste Forum Inc

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?
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? No

Comment

The New Zealand trade and industrial waste forum is deeply concerned that nitrogen loadings and phosphorus loadings to our river systems has not been considered within the scope of this document. We are working on draft legislation of our own to produce a set of national standards in conjunction with three regional councils to standardise the load levels in all consent processes across New Zealand because the RMA has failed us in several areas of concern. It makes no sense that a factory when applying for a discharge and refused in one regional Council can build a 90 m pipeline and dump its discharge in the same river further downstream in the territory of another regional Council this sort of behaviour makes nonsense out our out of our environmental protection procedures.

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

Proposed amendments to the National Policy Statement for Freshwater Management 2011



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

Comment

7. Do you agree with requiring councils to account for all sources of contaminants? No

Comment

the level of contaminants that councils have to account for can only be the ones under the councils control pollutants from municipal and trade waste. Pollutants that come from rural sector farming and dairy environments that still contaminate our rivers cannot be considered under Council control.

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

I would like to take this further but my submission on this point as many many pages of information pertaining to the virtual water economy of New Zealand. There is no space for the submission to be made here such submissions will be made formally if there is a hearing process.

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)? Yes

Comment

12. Are there any values that should be deleted from appendix 1 of the proposed NPS-FM and why?

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?

Comment

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

Comment

Proposed amendments to the National Policy Statement for Freshwater Management 2011



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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?

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

The Macro-invertebrate Community Index which is a well-used and understood measure of river and stream health

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to monitor changes in the number and diversity of aquatic insects such as mayflies and caddisflies.
A limit on nitrogen and phosphorus as nutrients. The proposed bottom line for nitrate is the level where it is toxic to fish and other aquatic life. This will not prevent nuisance algal blooms.
A limit on deposited sediment. Soil belongs on the land not in rivers. Sediment smothers spawning areas and habitats.
A measure for dissolved oxygen across a river, not just in relation to point source discharges. Dissolved oxygen is critical for life and can vary hugely between day and night.
Measures for estuaries. Estuaries are vital as fish nurseries and pathways and have important recreational and cultural values.

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

Comment

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?

Comment

Proposed amendments to the NPS-FM: National bottom line

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

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? No

Comment it does not take into account any of the factors listed above

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

Water clarity.

Periphyton cover which is a measure of how much algae, bacteria and detritus is covering the river bed

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? No

Comment

Proposed amendments to the National Policy Statement for Freshwater Management 2011



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

Comment

however not in the case of economic activity this is a user pays environment economic activity must account for its use of the environment as part of its economic structure

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

this is a very difficult subject and needs a lot more consideration outside the scope of this document

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

Comment

however this has to be a nationally coordinated effort regional councils operating in isolation of each other have demonstrated the failure and manipulation of the RMA with regards to industrial discharge pollution of water for recreational and economic use. While allocation of units should be decided by regional councils there must be some form of national accountability which currently there is not.

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?

Comment

39. Do you agree with the way t?ngata 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

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Comment

the monitoring plans do not go far enough they are not monitoring many factors which matter.

Other comments

42. Is there anything else you would like to tell us about the issues and proposals in this document?
our entire nation runs on a virtual water economy everything we do from sheep to would to agricultural products all our produce all our meat all our milk is because our water is essentially abundant's and 3 and clean. If we pollute our water sources our entire economy will suffer not just our recreational use our entire economy. It takes 14,000 L of water to produce a kilo of beef if we had to treat that water because it was polluted with nitrogen and phosphorus and other contaminants a kilo of beef could cost an additional \$8-\$12. This would destroy our entire market the recreational water policies here need to be taken into account in tandem with our national economy. This document fails to account for this.