

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 Jo-Anne

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Organisation

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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? Yes
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? Yes

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

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

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right balance between national prescription and regional flexibility? Yes

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)? Yes

Comment

I like the collaborative approach to water use/management and thoughtful consideration of the livelihoods of those who use or pollute, but we need an absolute bottom line and guidelines for Councils taking measures on non compliant behaviour which violate these bottom lines.

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? Yes

Comment

It worries me that longfin eel, under the Min. of Primary Industries are being overfished and they swear they are not when it is obvious to the rest of us that they are becoming increasingly endangered.

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

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? Yes

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Comment

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

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? Yes

Comment

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

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? Yes

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 It worries me. I think this needs reviewing as we see how it works.

24. Are there any aspects of the process that are not clear? No

Comment

Proposed amendments to the NPS-FM: Compulsory values

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

Comment

For me, this is more important than any other consideration though I recognise it will be hard and will have economic impacts.

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? No

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Comment

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

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

I can't think of any excusable exception in our district but I know that they must exist elsewhere. Some changes will take a long time because the situation is so complex.

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

Comment see above.

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

I guess the Cobb dam. It was placed when consideration wasn't given to fish passage. They have created a generous mitigation fund which is used to improve waterways in the catchment area and the Takaka Valley has benefited considerably regarding riparian planting and fencing, created wetlands etc but its very sad that eels are unable to travel to breeding grounds and fish have no access to the sea from a huge natural water catchment area.

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

Comment

Just keep tight control to avoid slipping into the do nothing state which is by far the easiest option.

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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

Depends. Some infrastructure is expensive and in the national interests to be there but when its old and passed its usefulness, a new structure should be under the new criteria

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? Yes

Comment

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

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? Yes

Comment Yes, add it. We need to trust Maori kaitiakitanga.

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? No. Its been well done and very surprising considering the damage this Government's decisions have been doing to other parts of the environment. I can hardly believe it has reached this stage and I have my fingers and toes crossed for its successful transition into law.