

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 Rosa

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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? No

Comment

Proposed amendments to the NPS-FM: accounting

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

Comment

This would make it easier to allocate future water takes as there would be accurate data on current use patterns.

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

Comment

This would enable Freshwater Management Officers to be able to work with people/companies that are at the source of major contamination to reduce or eliminate it.

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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? Yes

Comment

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

Comment

It will take 15 years easily to get all that work done, as accounting for all the freshwater bodies around NZ would be complex and time-consuming.

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)? No

Comment

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

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? Yes

Comment

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

Comment

We've delayed this for long enough. Our waterways are in dire need of more care, especially here in the Manawatu.

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?

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? Yes

Comment

Timeframes in particular may need adjustment for the reality of implementing objectives successfully.

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

Comment

Some areas (e.g. Upper Waikato) may not need much time at all, while other regions (e.g. Manawatu) may need all the time available.

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

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

Comment

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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

I would like to have primary contact recreation as a compulsory value, as I enjoy swimming. However, I understand that isn't feasible in all waterways which have been heavily polluted over many years. I think it would be wise to have a two tier system of compulsory values. The first tier would be secondary contact, and the second tier would be primary contact. Any waterway currently safe for secondary contact, where it is feasible to improve further, should be given the second tier objective; while very dirty waterways could aim for the first tier only.

Proposed amendments to the NPS-FM: National bottom line

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

Comment

That would make it much easier for councils and local communities to know when they have reached their objectives, and tick off work programs etc.

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 Only for waterways which are very hard to rehabilitate, e.g. the Manawatu River.

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'm not sure which waterways in the Manawatu would qualify. I think the Manawatu River is considered very bad, but I've seen other people swimming in it, so we really need to get it cleaned up properly, and not stop until it meets at least the bottom lines if not better.

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

Comment I'm not sure.

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

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Comment Turitea Dam?

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

Comment

I think it should be decided by regional councils in conjunction with consultation with the Government (at least with MfE), to ensure there is some outside auditing and checks to make sure councils aren't trying to avoid cleaning up waterways that could possibly be improved anyway.

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

This isn't a Yes/No question. Exceptions would be hydroelectric/drinking water dams which are needed for the ongoing health, maintenance and wellbeing of our people. Particularly infrastructure of national significance e.g. large hydroelectric dams in the South Island.

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

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

Monitoring enables objectives to be met, and ensures that waterways stay within the bottom lines once they have been rehabilitated.

Other comments

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

It seems sensible. I would like to see swimming made a compulsory value with the two tier system I suggested, as

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swimming is a major part of national recreation, and many people do it even if the waterway isn't high quality - putting themselves at risk of sicknesses. Many waterways have no signs to indicate they are or are not safe to swim in, so it would be easier if the public could assume they are safe rather than not going swimming at all. Improving water to be drinkable would be awesome, but I know that isn't feasible for most waterways now, so I wouldn't make it compulsory.