

# **THE NEW ZEALAND FEDERATION OF FRESHWATER ANGLERS (INC)**

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## **Clean Water Consultation**

### **Submission on the Draft Regulatory Impact Statement: Proposed amendments to the National Policy Statement for Freshwater Management 2014**

To: **Ministry of the Environment – Clean Water Consultation  
New Zealand Parliament**

Name of Submitter: **The New Zealand Federation of Freshwater Anglers (Inc.)**

Date: **27 April 2017**

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#### **Introduction**

*The New Zealand Federation of Freshwater Anglers (Inc)* is an affiliation of anglers and angling clubs throughout NZ and overseas. It has been in operation since 1974 and is an independent organization that seeks to represent the collective interests of the near 100,000 licence holding anglers who participate in freshwater sports fishing throughout New Zealand. The Federation's strength lies in its independence and the number of anglers it represents.

The Federation's work is to identify and resolve national issues affecting freshwater angling in NZ and supports member clubs and organisations in their efforts to resolve local issues.

Constitutionally it is charged to advocate the protection of New Zealand's natural environment and in particular its freshwater ecosystems, their surrounding environment and the recreational angling so afforded. As anglers we see and experience changes to rivers and lakes first-hand and are thus best placed to comment on any proposals that affect freshwater systems and catchment areas.

Besides being keen anglers, our members are also farmers, agricultural consultants, accountants, conservationists, resource planners, teachers, journalists and scientists – professional people all passionate, knowledgeable about and reliant upon the environment. Many have also fished overseas and have experienced the deterioration of fresh water by environmentally insensitive and thoughtless development, a situation which they do not wish to see repeated here.

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## Executive Summary

We are pleased to see the Ministry for the Environment's environmental reporting function finally being reviewed and regional councils' current shortcomings being recognized. However, with the Statement, in its current format, these general principles could easily be perverted with the resultant reports and outcomes being relegated to commercial and/or politically expedient messages and consequences.

## Areas of Concern

The key area which makes the proposed Statement **unacceptable** to the NZFFA is listed under "Objectives" and is highlighted below:

Objectives

25. The preamble of the Freshwater NPS sets out the following objectives:

- a. Freshwater management is done in an integrated manner, recognising the links between land, water and the marine environment;
- b. Freshwater resources are managed sustainably to ensure that future generations can benefit from them as well as current resource users. This requires the establishment of clear limits on resource users; and
- c. **Freshwater management enables economic development and does not unnecessarily constrain economic activity.**

## Key notes:

1. The Federation of Fresh Anglers does not see why this statement should, or needs to; include this "priority (objective)". Our understanding, of the function of the statement, is that it was to maintain and enhance the natural"/wild" freshwater ecosystems of Aotearoa.
2. The looseness of the statement, in its current form, is almost certain to provide a level of ambiguity which will increase the variability of the interpretations by Regional Councils.
3. This wording (highlighted) requires the regional Councils to be Judge, Jury and Executioner of environmental health.
4. In general terms the Federation is extremely skeptical of Regional Councils ability and motivation to be consistent in their interpretations of the Statement. This is based on past performance. Refer to your own Section 16; re. Inconsistencies.
5. The Federation has no faith in "Parish Pump Politics" as a mechanism of providing consistent standards. The proposed delegations to local authorities are not explicit enough to eliminate this situation. It is clear to us that local immediate concerns will over-ride strategies that affect the long-term well-being of New Zealand's waterways and their biological health.
6. "Independent local decisions" are almost irrelevant in modern New Zealand as our citizens are increasingly mobile in both their recreation and work. The

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greatest recreational users of the Taupo catchment come from the Wellington and Auckland areas and are thus significantly affected by local decision making. The same applies for the McKenzie and Southern Lakes districts which draw their regular visitors from the coastal Canterbury and Otago regions.

7. These “external-based users” of the region contribute significantly to the local economy, particularly in the service and tourism sectors.
8. Unless the writers of the Statement want to include new enforceable sections which require polluters to pay directly for the unacceptable levels of E.coli, Nitrogen, Phosphorus, Zinc, Copper and sediments then we see the statement as incomplete.
9. The document is noticeably lacking in timelines which meet the expectations of our members and other recreational and environmental groups.
10. The Statement fails to address the greatest factors in stream and river health:
  - The role of minimum flow requirements in aiding “flushing” of rivers and maintaining river and stream biota in times of climatic stress. The power of “dilution” is ignored as a need in water health.
  - The timeline for degradation began to accelerate a mere 25 years ago. Since that time we have seen a massive increase in the intensification of dairy farming (500% in Canterbury which now has 1.2 million cows) without effective requirements for effluent and excess fertilizer disposal being required or implemented.
  - The direct relationship between river health and the extraction of excess water levels (water mining) from aquifers reliant on those waterways.
  - The fallibility of relying solely on E. coli levels in determining river and lake health. The complex of mineral levels in 7 (above) and the accelerated sediment depositions from forestry activities, especially logging, and the “spray and pray” farming practices for winter stock feed production.

## Conclusions

The sentences on economic development are interpreted, particularly as they were not highlighted when the document was released, by our members as *dishonest writing and/or behavior that is designed to deceive people*.\*

The Statement in its present form is both inadequate and confusing. Its specific wording requiring that it “**does not constrain economic activity**” clearly ignores its original purpose of protecting the purity of the nation’s waterways and the health of their natural ecosystems and biodiversity.

\*Cambridge Advanced Learners Dictionary definition of “Political Humbug”

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