

Submission to Ministry for the Environment.

Re: Amendments to the National Policy Statement for Freshwater Management 2011,
and specifically the National Objectives Framework.

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While the following submission focuses on sections 4.3 and 4.4 of the proposed amendments to the National Policy Statement for Freshwater Management 2011 (NPS FM), we make two general but important observations about the proposed amendments. Firstly, the NPS FM requires Regional Councils, in setting their freshwater objectives, to maintain or improve overall water quality within their region.

That sounds reassuring, but in fact it is grossly misleading. In practice the proposed Framework allows Councils to set attributes that would permit a significant deterioration in water quality in some water management units so long as there were offsetting improvements in other management units within the region.

It's not clear how these offsets would be audited and indeed whether water management units are sufficiently independent to make the measurement, definition and maintenance of such offsets credible.

We recommend that Councils be required to maintain or improve water quality in every management unit. To be clear, (and also consistent with the general message in NPS FM) no offsetting would be permitted. If the government wants to retain wriggle room it could state that a Council, in exceptional circumstances, may permit a deterioration in water quality, but in so doing it would be required to be very public about the permitted deterioration, the reasons for allowing it, who will benefit and what the likely long-term costs will be for water quality and the environment.

Secondly, there appears to be a relatively narrow view taken on the economic value of waterways. The overriding impression is that the objectives accept as necessary a trade-off between the economic returns we can achieve by exploiting our rivers and lakes (mainly for agriculture, but energy as well) and the social and environmental benefits we enjoy from having clean waterways.

The economic benefits that can be derived from our waterways are not just those captured by farmers, especially dairy farmers, and power companies. There are a number of important long-term economic benefits from improving our waterways and ideally returning many more of them to closer to their natural state. Tourism (both international and domestic), and national branding depend on the quality and sustainability of our environment.

National branding - as was made clear by the Prime Minister in justifying the government's direct investment in foreign filmmaking in New Zealand - is a major contribution to GDP via tourism as well as the price premia for products made in an environmentally sustainable way. The economic impact modelling that has been undertaken suggests that in Southland dairy cow

numbers can increase while maintaining or improving water quality. That seems unlikely. It is not obvious from the NPS-FM proposed amendment document that any account has been taken of the potential costs to our economy of destroying the integrity of the 100% Pure brand that has been so successful in stimulating visitor numbers; nor the cost of undermining the clean-green image that has been so important in marketing our agricultural exports.

We recommend the government releases the full details of the economic impact modelling that has been undertaken so that it can be peer reviewed.

Proposed amendments to the NPS-FM: Compulsory values

Q25. Do you agree that ecosystem health should be a compulsory value?

Yes: Comment

Our major concern is that this value is worded in such a way as to appeal to most people because they will interpret it as meeting their perception of ecosystem health. Who would not endorse the idea of healthy ecosystems? To the extent that ecosystem health is defined at all, it requires Councils to avoid “chronic effects ... such as high temperatures, low oxygen, changes in freshwater chemistry, high sediment levels, or algal blooms. Other important matters are toxic effects of contaminants, and the essential habitat needs of the flora and fauna”.

It is almost like suggesting that an ecosystem is healthy as long as it is not dead! A more truthful way of stating this compulsory value as currently defined would be that “ecosystem health should not be seriously impaired”. Such a statement would of course attract considerable scrutiny, but as worded the Minister and the Ministry have sought to minimise such scrutiny.

Q26. Do you agree that human health for secondary contact recreation (such as boating and wading) should be a compulsory value?

No: Comment

The compulsory value for human health should be for primary contact recreation. The policy statement makes it clear that Objectives can and will be long term. Requiring Councils to aim for rivers and lakes clean enough to swim in would be consistent with maintaining or improving water quality – eventually all waterways would be safe to swim in. Furthermore it would support the wider and longer-term economic benefits of healthy waterways.

Q27. 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

Human health for primary contact recreation should replace the secondary contact compulsory value and be a long-term (20 year) compulsory value for a high proportion (90%) of all rivers.