



Established 1968

## New Zealand Freshwater Sciences Society

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### **New Zealand Freshwater Sciences Society: Comments on Amendments to the National Policy Statement for Freshwater Management**

The New Zealand Freshwater Sciences Society (NZFSS) supports the 2014 implementation of the National Policy Statement for Freshwater Management (NPS–FM) to increase transparency of decision making processes and allow for well–informed decisions to sustain freshwater resources for future generations. The process of engagement of a large number of scientists from NZFSS underlies the need for a science–based approach to support the NPS–FM. In particular, it will require strengthening freshwater science to support the development of the National Objectives Framework.

A number of positive steps have been taken in the NPS–FM. Tāngata whenua values in freshwater management (Te Mana o te Wai) have been more explicitly recognised, including the important role of iwi and hapū in freshwater management. Management of freshwater by Councils will include *all* freshwater bodies within Councils' regions. The NPS–FM also directs Councils to set limits for nutrients to manage periphyton (algae on the bed) in rivers and streams, and phytoplankton (algae suspended in the water column) in lakes.

While the implementation of the NPS–FM represents significant progress in implementing objectives and policies to address urgent issues of declining quantity and quality of New Zealand's water resources, there are still some major challenges ahead. These include:

- Definition of freshwater management units, which will rely on Councils to quickly designate these units to start implementing the NPS–FM. There will need to be national–level guidance for Councils to define these units consistently.
- The need for biological indicators which reflect the cumulative effects of multiple stressors. The Macroinvertebrate Community Index (MCI) is considered by the Ministry for the Environment itself to be a robust and useful way to assess environmental health in wadeable rivers and streams, but for legal reasons is not included in the National Objectives Framework. NZFSS recommends inclusion of a suitable biological indicator to complement periphyton, which is currently the only biological indicator used to assess river and stream ecosystem health in the NPS–FM. This is particularly important as Councils implement the nutrient limits required of them by the NPS–FM.
- NZFSS wishes to see goals set so that water bodies below the bottom line remain so for the least–possible period of time, thus necessitating sustained restoration actions. In the NPS–FM this case applies specifically to the transitional period designated for some degraded water bodies, when objectives can be set below the bottom line.
- Very little or no information exists on limit setting for wetlands and estuaries, which are some of the most threatened aquatic habitats in New Zealand, nor are there specific objectives for groundwater. A proposed independent review of the NPS–FM in 2016 should examine how the NPS–FM can better address degradation of these habitats, recognising the interconnected nature of freshwaters and their effects on the health of coastal waters.

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