

**BEFORE INDEPENDENT COMMISSIONERS**

**UNDER** the Resource Management Act  
1991

**IN THE MATTER** of Variation 1 to the Proposed  
Canterbury Land and Water  
Regional Plan

**SUPPLEMENTARY LEGAL SUBMISSIONS OF COUNSEL FOR THE  
CANTERBURY REGIONAL COUNCIL**

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## **Introduction**

1. These legal submissions address the implications of the National Policy Statement for Freshwater Management 2014 in respect to Variation 1 to the proposed Land and Water Regional Plan.

## **National Policy Statement for Freshwater Management 2014**

2. The National Policy Statement for Freshwater Management 2014 ("NPSFM 2014") was *Gazetted* on 4 July 2014 and it came into force on 1 August 2014.
3. From 1 August 2014 the National Policy Statement for Freshwater Management 2011 ("NPSFM 2011") was revoked.
4. As was set out in the section 42A report,<sup>1</sup> Variation 1 was prepared on the basis that it was required to give effect to the NPSFM 2011. The section 42A report was also prepared on that basis.
5. The section 42A report foreshadowed that the Council would address the implications of the NPSFM 2014 at the hearing of Variation 1.
6. Accordingly, these supplementary legal submissions address:
  - a. The legal effect of the NPSFM 2014;
  - b. The objectives of the NPSFM 2014;
  - c. The policies of the NPSFM 2014 and the Council's implementation programme in the Selwyn Waihora catchment; and
  - d. What the implementation programme means for Variation 1.

### *The legal effect of the NPSFM 2014*

7. Section 67 of the RMA requires that a regional plan must give effect to any national policy statement. The NPSFM 2014 replaced the NPSFM 2011, which was revoked from 1 August 2014. The NPSFM

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<sup>1</sup> Section 42A report, paragraph 7.81

2011 no longer has any legal effect. Accordingly, any decision on Variation 1 is not required to give effect to the NPSFM 2011.

8. The NPSFM 2014 contains no transitional or savings provisions dealing with the scenario where a plan, plan change or variation has been notified but where decisions on the relevant planning proposal have not yet been made.
9. Section 55 of the RMA is the relevant section dealing with local authority recognition of national policy statements. A national policy statement must be recognised by the local authority by it:
  - a. Amending its plans to either (a) include specific objectives and policies set out in the national policy statement, or (b) give effect to objectives and policies, without using a Schedule 1 process if the national policy statement directs; and
  - b. For all other amendments to a document needed to give effect to a national policy statement the local authority must use a Schedule 1 process (i.e. a process of notification, submissions, further submissions, hearings and decisions).
10. The only two policies in the NPSFM 2014 that are required to be given effect to "directly" without using a Schedule 1 process are Policies A4 and B7. All other objectives and policies must be given effect to using the process in Schedule 1 of the Act.
11. Under section 55(2D) where a national policy statement must be given effect to using the Schedule 1 process, the local authority must make the amendments as soon as practicable or within the time specified in the national policy statement or before the occurrence of an event specified in the national policy statement.
12. Policy E1 of the NPSFM 2014 is relevant to the time in which the Council is required to implement the policies (but not the objectives) of the NPSFM 2014. It states:

***"Policy E1***

*a) This policy applies to the implementation by a regional council of a policy of this national policy statement.*

*b) Every regional council is to implement the policy as promptly as is reasonable in the circumstances, and so it is fully completed by no later than 31 December 2025.*

*ba) A regional council may extend the date in Policy E1(b) to 31 December 2030 if it considers that:*

- i. meeting that date would result in lower quality planning; or*
- ii. it would be impracticable for it to complete implementation of a policy by that date.*

*c) Where a regional council is satisfied that it is impracticable for it to complete implementation of a policy fully by 31 December 2015, the council may implement it by a programme of defined time-limited stages by which it is to be fully implemented by 31 December 2025 or 31 December 2030 if Policy E1(ba) applies.*

*d) Any programme of time-limited stages is to be formally adopted by the council by 31 December 2015 and publicly notified.*

*e) Where a regional council has adopted a programme of staged implementation, it is to publicly report, in every year, on the extent to which the programme has been implemented.*

*f) Any programme adopted under Policy E1 c) of the National Policy Statement for Freshwater Management 2011 by a regional council is to be reviewed, revised if necessary, and formally adopted by the regional council by 31 December 2015, and publically notified."*

13. It is of note that Policy E1 only applies to the implementation of policies in the NPSFM 2014, not objectives.
14. As will be addressed in further detail below, the Council has publicly notified part of a programme of time-limited stages for implementation of some of the policies in the NPSFM 2014 due to it being impracticable to implement them through Variation 1.

*The objectives in the NPSFM 2014*

15. As there are no transitional provisions regarding the NPSFM 2014, and given that Policy E1 only applies to policies of the NPSFM 2014, all objectives in the NPSFM 2014 must be given effect to by Variation 1.
16. The objectives in the NPSFM 2014 are broadly the same as the objectives in the NPSFM 2011. To assist the hearing panel, set out in **Appendix 1** are the new NPSFM 2014 objectives with the changes from the NPSFM 2011 shown in mark-up.
17. In respect of the changes, the Council considers that Variation 1 does give effect to the objectives in the NPSFM 2014:

- a. Objectives A1 and A2 (addressing water quality) are given effect to by Variation 1. The main themes of the objectives are unchanged. Life supporting capacity, ecosystem processes and indigenous species, and now the health of people and communities must be safeguarded in *sustainably managing the use and development of land, and of discharges of contaminants*. The requirement that the overall quality of freshwater within a region is maintained or improved is also unchanged (although notably now the *significant values* of outstanding freshwater bodies must be protected, rather than protecting the *quality* of outstanding freshwater bodies).
- b. Objectives B1, B2, B3 and B4 (regarding water quantity) are also being given effect to be Variation 1.
- c. Objective C1 regarding the integrated management of freshwater is unchanged from the NPSFM 2011.
- d. Objective D1 addressing tāngata whenua roles and interests is also unchanged.
- e. Objective CA1 is a new objective setting out the new National Objectives Framework. This is particularly relevant in terms of the policies that now require freshwater objectives to be established in accordance with Policies CA1-CA4. This is addressed further below regarding how Variation 1 gives effect to the policies in the NPSFM 2014.
- f. Objectives CB1 and CC1 are also new objectives. Together they require the Council to develop a monitoring plan, and also to establish a freshwater quality accounting system and a freshwater quantity accounting system. These are not directly relevant to Variation 1 and how it gives effect to the NPSFM 2014.

*The policies in the NPSFM 2014 and the Council's implementation programme*

18. Variation 1 is also required to give effect to the policies in the NPSFM 2014 (except to the extent that Policy E1 applies).

19. Variation 1 was prepared on the basis that it had to give effect to the NPSFM 2011, including the policies of the NPSFM 2011 that require regional councils to set freshwater objectives, limits to avoid over allocation and targets in over allocated catchments to give effect to the NPSFM 2011 objectives.
20. The NPSFM 2014 policies also require the Council to set freshwater objectives, limits and targets to give effect to the objectives of the NPSFM 2014 (which as addressed above, remain largely the same as the objectives in the NPSFM 2011). **Appendix 2** contains the key freshwater quality and freshwater quantity policies showing the changes made from the NPSFM 2011 in the NPSFM 2014.
21. While the NPSFM 2014 requires the Council to set freshwater objectives, limit and targets, the process by which they are to be set is quite different to the NPSFM 2011.
22. The NPSFM 2014 contains a very prescriptive process in which the freshwater objectives (the intended environmental outcomes) are to be set (through a new National Objectives Framework). These are contained in a new set of policies: Policies CA1 to CA4.
23. In formulating freshwater objectives which are required to be set under Policies A1 and B1, the Council is required to set the freshwater objective in numeric terms by reference to the specified numeric attribute state contained in the Appendix to the NPSFM 2014 (if there is a numeric attribute state).
24. In particular, Policy CA2 requires the Council (in developing freshwater objectives) to consider all national values for water and identify the values for each freshwater management unit (i.e. water body) which includes two compulsory values and may include any other national value or values that the regional council considers appropriate.
25. The process under Policy CA2 also requires the Council to assign attribute states for the compulsory values and also for the other values identified for the particular freshwater management unit (some attribute states are specified in an Appendix to the NPSFM 2014 and if an attribute state is not given the Council is required to set an attribute state that the regional council considers appropriate). Freshwater

objectives must be formulated in numeric terms with reference to the attribute state if one is included in Appendix 2 of the NPSFM 2014.

26. Under Policy CA3, the Council is required to ensure that freshwater objectives for the compulsory values are set at or above national bottom lines for the relevant attribute states unless the existing freshwater quality of the freshwater management unit is already below the national bottom line and the Council considers it appropriate to set the freshwater objective below the national bottom line because the existing freshwater quality is caused by naturally occurring processes or because listed infrastructure<sup>2</sup> contributes to the existing freshwater quality.
27. The freshwater objectives for Variation 1 have not been set using this exact process because at the time the Variation was developed the process did not exist. Although the exact process required by policies CA1 – CA4 was not followed, the process undertaken by the Zone Committee was very similar.
28. This has flow on effects for the setting of limits, environmental flows/levels and targets. This is because a limit is defined as the maximum amount of resource use available which allows a *freshwater objective* to be met. Similarly environmental flows and/or levels are a type of limit which is required to meet *freshwater objectives*. Targets are limits to be met over time where a resource is over-allocated. Given that the National Objectives Framework may result in some changes to the freshwater objectives, it is not possible at this time to say whether any changes will also need to be made to the limits, environmental flows/levels and targets.
29. In light of the prescriptive process that must now be followed by a regional council when implementing the NPSFM 2014 it is impracticable for Canterbury Regional Council to fully complete implementation of the NPSFM 2014 by 31 December 2015.
30. To address this, the Council resolved to notify a progressive implementation programme under Policy E1 for the Selwyn Te Waihora catchment.

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<sup>2</sup> Although to date no such infrastructure has been identified.

31. At the Council meeting on 4 September 2014 it was resolved:

*"That the Council:*

*(a) adopts this part of the revised implementation programme to implement the National Policy Statement for Freshwater Management 2014 (Attachment 2)*

*(b) approves public notification of the revised implementation programme on 13 September 2014*

*(c) notes further decisions will be required in 2015 about the timing of further stages to complete the implementation programme."*

32. The progressive implementation programme was publicly notified on 13 September 2014.
33. A copy of the public notice and implementation programme is contained in **Appendix 3**.
34. The implementation programme applies to Policies A1, A2, A3, B1, B2, B5, B6, CA1, CA2, CA3 and CA4. Under the programme the Council must fully implement these policies by 2025.

*What the Council's implementation programme means for Variation 1*

35. While the Council has publicly notified an implementation programme that means Policies A1, A2, A3, B1, B2, B5, B6, CA1, CA2, CA3 and CA4 do not have to be fully implemented until 2025, the freshwater objectives, limits, environmental flows and targets proposed by Variation 1 are still a critical aspect of Variation 1.
36. The freshwater objectives, limits, environmental flows/levels and targets help ensure that the objectives of the NPSFM 2014 are being given effect to within the Selwyn Te Waihora catchment. For example, they are necessary to ensure that the overall quality of water is maintained or improved (as required by Objective A2).
37. Accordingly, these aspects of Variation 1 are necessary for Variation 1 to give effect to the NPSFM 2014, insofar that it is required to do so under section 67 of the RMA and section 55 of the RMA.
38. The Council acknowledges that further changes to the freshwater objectives, limits, environmental flows/levels and targets contained in



Variation 1 may need to be made to fully implement Policies A1, A2, A3, B1, B2, B5, B6, CA1, CA2, CA3 and CA4, particularly in light of the National Objectives Framework and new attribute states.

However, such changes will be addressed by 2025 as anticipated by Policy E1 and in accordance with the Council's progressive implementation programme.

39. Further, while the freshwater objectives, limits, environmental flows and targets in Variation 1 were not established fully in compliance with the National Objectives Framework, they will be critically important to ensuring that in time the national bottom lines (once put in place through an additional process in accordance with the progressive implementation programme) can be achieved.

40. As is recognised in the preamble to the NPSFM 2014:

*"National bottom lines in the national policy statement are not standards that must be achieved immediately. Where freshwater management units are below national bottom lines, they will need to be improved to at least the national bottom lines over time. It is up to communities and iwi to determine the pathway and timeframe for ensuring freshwater management units meet the national bottom lines. Where changes in community behaviours are required, adjustment timeframes should be decided based on the economic effects that result from the speed of change. Improvements in freshwater quality may take generations depending on the characteristics of each freshwater management unit."*

41. The Council considers that Policies A1, A2, A3, B1, B2, B5, B6 are partially being given effect to by Variation 1<sup>3</sup>, but that they will not be able to be fully implemented until the process under Policies CA1 to CA4 has been completed. This is not to say, however, that the provisions of Variation 1 are not critically important to:

- a. Safeguarding the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems of freshwater and the health of people and communities in sustainably managing the use and development of land and of discharges of contaminants;

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<sup>3</sup> For a full explanation of how these policies are being given effect to (in the context of the NPSFM 2011) see paragraph 7.96 of the Section 42A report.

- b. Maintaining and improving the quality of water in the Selwyn Te Waihora catchment;
- c. Safeguarding the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems of freshwater in sustainably managing the taking, using damming or diverting of freshwater;
- d. Avoiding over-allocation and improving the efficient allocation and efficient use of water;
- e. Protecting the significant values of wetlands and outstanding freshwater bodies;
- f. Improving the integrated management of freshwater and the use and development of land in whole catchments; and
- g. Providing for the involvement of iwi and hapu and to ensure that tāngata whenua values and interests are identified and reflected in the management of freshwater.

**DATED** this 16<sup>th</sup> day of September 2014



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P A C Maw

Counsel for the Canterbury Regional Council

**Appendix 1 – Objectives of NPSFM 2014 (showing changes from NPSFM 2011)**

**A. Water quality**

**Objective A1**

To safeguard:

a) the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems, of fresh water; and

b) the health of people and communities, at least as affected by secondary contact with fresh water;

in sustainably managing the use and development of land, and of discharges of contaminants.

**Objective A2**

The overall quality of fresh water within a region is maintained or improved while:

a) protecting the significant values ~~quality~~ of outstanding freshwater bodies;

b) protecting the significant values of wetlands; and

c) improving the quality of fresh water in water bodies that have been degraded by human activities to the point of being over-allocated.

**B. Water quantity**

**Objective B1**

To safeguard the life-supporting capacity, ecosystem processes and indigenous species including their associated ecosystems of fresh water, in sustainably managing the taking, using, damming, or diverting of fresh water.

**Objective B2**

To avoid any further over-allocation of fresh water and phase out existing over-allocation.

**Objective B3**

To improve and maximise the efficient allocation and efficient use of water.

**Objective B4**

To protect significant values of wetlands and of outstanding freshwater bodies.

### **C. Integrated management**

#### **Objective C1**

*To improve integrated management of fresh water and the use and development of land in whole catchments, including the interactions between fresh water, land, associated ecosystems and the coastal environment.*

### **CA. National Objectives Framework**

#### **Objective CA1**

To provide an approach to establish freshwater objectives for national values, and any other values, that:

- a) is nationally consistent; and
- b) recognises regional and local circumstances.

### **CB. Monitoring plans**

#### **Objective CB1**

To provide for an approach to the monitoring of progress towards, and the achievement of, freshwater objectives.

### **CC. Accounting for freshwater takes and contaminants**

#### **Objective CC1**

To improve information on freshwater takes and sources of freshwater contaminants, in order to:

- a) ensure the necessary information is available for freshwater objective and limit setting and freshwater management under this national policy statement; and
- b) ensure information on resource availability is available for current and potential resource users.

### **D. Tāngata whenua roles and interests**

#### **Objective D1**

*To provide for the involvement of iwi and hapū, and to ensure that tāngata whenua values and interests are identified and reflected in the management of fresh water including associated ecosystems, and decision-making regarding freshwater planning, including on how all other objectives of this national policy statement are given effect to.*

## **Appendix 2 – Selected Policies of NPSFM 2014 (showing changes from NPSFM 2011)**

### **A. Water quality**

#### **Policy A1**

*By every regional council making or changing regional plans to the extent needed to ensure the plans:*

- a) establish freshwater objectives in accordance with Policies CA1 – CA4 and set freshwater quality limits for all freshwater management units ~~bodies of fresh water~~ in their regions to give effect to the objectives in this national policy statement, having regard to at least the following:
 
  - i) the reasonably foreseeable impacts of climate change;*
  - ii) the connection between water bodies; and*
  - iii) the connections between freshwater bodies and coastal water; and**
- b) establish methods (including rules) to avoid over-allocation.*

#### **Policy A2**

*Where freshwater management units ~~water bodies~~ do not meet the freshwater objectives made pursuant to Policy A1, every regional council is to specify targets and implement methods (either or both regulatory and non-regulatory), in a way that considers the sources of relevant contaminants recorded under Policy CC1, to assist the improvement of water quality in the freshwater management units ~~water bodies~~, to meet those targets, and within a defined timeframe.*

### **B. Water quantity**

#### **Policy B1**

*By every regional council making or changing regional plans to the extent needed to ensure the plans establish freshwater objectives in accordance with Policies CA1 – CA4 and set environmental flows and/or levels for all freshwater management units ~~bodies of fresh water~~ in its region (except ponds and naturally ephemeral water bodies) to give effect to the objectives in this national policy statement, having regard to at least the following:*

- a) the reasonably foreseeable impacts of climate change;*
- b) the connection between water bodies; and*
- c) the connections between freshwater bodies and coastal water.*

#### **Policy B2**

*By every regional council making or changing regional plans to the extent needed to provide for the efficient allocation of fresh water to activities, within the limits set to give effect to Policy B1.*

**Policy B3**

*By every regional council making or changing regional plans to the extent needed to ensure the plans state criteria by which applications for approval of transfers of water take permits are to be decided, including to improve and maximise the efficient allocation of water.*

**Policy B4**

*By every regional council identifying methods in regional plans to encourage the efficient use of water.*

**Policy B5**

*By every regional council ensuring that no decision will likely result in future over-allocation – including managing fresh water so that the aggregate of all amounts of fresh water in a freshwater management unit ~~water body~~ that are authorised to be taken, used, dammed or diverted— does not over-allocate the water in the freshwater management unit ~~water body~~.*

**Policy B6**

*By every regional council setting a defined timeframe and methods in regional plans by which over-allocation must be phased out, including by reviewing water permits and consents to help ensure the total amount of water allocated in the freshwater management unit ~~water body~~ is reduced to the level set to give effect to Policy B1.*

**CA. National Objectives Framework****Policy CA1**

*By every regional council identifying freshwater management units that include all freshwater bodies within its region.*

**Policy CA2**

*By every regional council applying the following processes in developing freshwater objectives for all freshwater management units:*

- a) considering all national values and how they apply to local and regional circumstances;*
- b) identifying the values for each freshwater management unit, which*
  - i. must include the compulsory values; and*
  - ii. may include any other national values or other values that the regional council considers appropriate (in either case having regard to local and regional circumstances);*
- c) identifying:*
  - i. for the compulsory values or any other national value for which relevant attributes are provided in Appendix 2:*
    - A. the attributes listed in Appendix 2 that are applicable to each value identified under Policy CA2(b) for the freshwater body type; and*
    - B. any other attributes that the regional council considers appropriate for each value identified under Policy CA2(b) for the freshwater body type; and*

- ii. for any national value for which relevant attributes are not provided in Appendix 2 or any other value, the attributes that the regional council considers appropriate for each value identified under Policy CA2(b) for the freshwater body type;
- d) for those attributes specified in Appendix 2, assigning an attribute state at or above the minimum acceptable state for that attribute;
- e) formulating freshwater objectives:
  - i. in those cases where an applicable numeric attribute state is specified in Appendix 2, in numeric terms by reference to that specified numeric attribute state; or
  - ii. in those cases where the attribute is not listed in Appendix 2, in numeric terms where practicable, otherwise in narrative terms; and
  - iii. on the basis that, where an attribute applies to more than one value, the most stringent freshwater objective for that attribute is adopted; and
- f) considering the following matters at all relevant points in the process described in Policy CA2(a)-(e):
  - i. the current state of the freshwater management unit, and its anticipated future state on the basis of past and current resource use;
  - ii. the spatial scale at which freshwater management units are defined;
  - iii. the limits that would be required to achieve the freshwater objectives;
  - iv. any choices between the values that the formulation of freshwater objectives and associated limits would require;
  - v. any implications for resource users, people and communities arising from the freshwater objectives and associated limits including implications for actions, investments, ongoing management changes and any social, cultural or economic implications;
  - vi. the timeframes required for achieving the freshwater objectives, including the ability of regional councils to set long timeframes for achieving targets; and
  - vii. such other matters relevant and reasonably necessary to give effect to the objectives and policies in this national policy statement, in particular Objective A2.

### **Policy CA3**

By every regional council ensuring that freshwater objectives for the compulsory values are set at or above the national bottom lines for all freshwater management units, unless the existing freshwater quality of the freshwater management unit is already below the national bottom line and the regional council considers it appropriate to set the freshwater objective below the national bottom line because:

a) the existing freshwater quality is caused by naturally occurring processes; or

b) any of the existing infrastructure listed in Appendix 3 contributes to the existing freshwater quality.

**Policy CA4**

A regional council may set a freshwater objective below a national bottom line on a transitional basis for the freshwater management units and for the periods of time specified in Appendix 4.



**Appendix 3 – Canterbury Regional Council's public notice of a progressive implementation programme in the Selwyn Te Waihora catchment.**

## **NATIONAL POLICY STATEMENT FOR FRESHWATER MANAGEMENT 2014 – PROGRESSIVE IMPLEMENTATION PROGRAMME IN THE SELWYN WAIHORA CATCHMENT, THE HINDS/HEKEAO PLAINS AREA AND THE SOUTH CANTERBURY COASTAL STREAMS AREA**

Pursuant to Policy E1(c), and Policy E1(d) of the National Policy Statement for Freshwater Management 2014, the Canterbury Regional Council (Environment Canterbury) gives public notice of a progressive implementation programme in respect of Policies A1, A2, A3, B1, B2, B5, B6, CA1, CA2, CA3 and CA4 of the National Policy Statement for Freshwater Management 2014 in the Selwyn Waihora catchment (as described in Section 11 of the proposed Land and Water Regional Plan), the Hinds/Hekeao Plains Area (consisting of the Hinds River/Hekeao catchment, and the plains between the Rangitata and Hakatere/Ashburton Rivers), and the South Canterbury Coastal Streams Area (consisting of the area from Morven Drain in the south to the Otaio River catchment in the north).

Canterbury Regional Council's programme in the Selwyn Waihora catchment involves the setting of interim freshwater outcomes, limits and targets, along with environmental flows and/or levels. These are contained in Variation 1 and these interim provisions have been developed collaboratively through working with communities in partnership with Canterbury Water Management Zone Committees and Te Rūnanga o Ngāi Tahu.

A further stage of the programme in the Selwyn Waihora catchment will occur by 2025 when Section 11 of the proposed Land and Water Regional Plan is reviewed and the National Objectives Framework is applied within this catchment so that all the policies in the National Policy Statement for Freshwater Management 2014 are fully implemented in the Selwyn Waihora catchment by 31 December 2025.

Canterbury Regional Council's programme in the Hinds/Hekeao Plains Area involves the setting of interim freshwater outcomes, limits and targets, along with environmental flows and/or levels. These will be contained in Variation 2 and these interim provisions have been developed collaboratively through working with communities in partnership with Canterbury Water Management Zone Committees.

A further stage of the programme in the Hinds/Hekeao Plains Area will occur by 2025 when Section 13 of the proposed Land and Water Regional Plan is reviewed and the National Objectives Framework is applied within this area so that all the policies in the National Policy Statement for Freshwater Management 2014 are fully implemented in the Hinds/Hekeao Plains Area by 31 December 2025.

Canterbury Regional Council's programme in the South Canterbury Coastal Streams Area involves the setting of interim freshwater outcomes, limits and targets, along with environmental flows and/or levels. These will be contained in a further variation or plan change to the proposed Land and Water Regional Plan and these interim provisions have been developed collaboratively through working with communities in partnership with Canterbury Water Management Zone Committees.

A further stage of the programme in the South Canterbury Coastal Streams Area will occur by 2025 when Section 15 of the proposed Land and Water Regional Plan is reviewed and the National Objectives Framework is applied within this area so that all the policies in the National Policy Statement for Freshwater Management 2014 are fully implemented in the South Canterbury Coastal Streams Area by 31 December 2025.

Further parts of a progressive implementation programme for all other catchments in the Canterbury region will be publicly notified under Policy E1 of the National Policy Statement for Freshwater Management 2014 by 31 December 2015.

A full copy of the progressive implementation programme in the Selwyn Waihora catchment, Hinds/Hekeao Plains Area and South Canterbury Coastal Streams Area is available for public inspection at:

- The offices of Environment Canterbury at:
  - Ellesmere Centre, 24 Edward Street Lincoln;
  - 75 Church Street, Timaru; and
  - 73 Beach Road, Kaikoura.
- The Environment Canterbury website: [www.ecan.govt.nz](http://www.ecan.govt.nz)

Annual reporting on the progressive implementation programme in the Selwyn Waihora catchment, the Hinds/Hekeao Plains Area and South Canterbury Coastal Streams Area will be described annually in the Council's Annual Report prepared under the Local Government Act 2002.

Bill Bayfield  
CHIEF EXECUTIVE

## Part Revised NPS-FM 2014 Implementation Programme

Part of Environment Canterbury's staged programme for implementing policies A1, A2, A3, B1, B2, B5, B6, CA1, CA2, CA3 and CA4 of the National Policy Statement for Freshwater Management 2014 is set out below:

Stages		Notification
1	A sub-regional section for integrated land and water management for the Selwyn-Te Waihora catchment	2023/2024
2	A sub-regional section for integrated land and water management in Hinds River/Hekeao and Ashburton-Rangitata groundwater zone	2023/2024
3	A sub-regional section for integrated land and water management in South Canterbury streams and Morven Glenavy groundwater	2023/2024

Other parts of this programme of time-limited stages by which these policies will be fully implemented by 2025 across the remainder of the region will be formally adopted by Council by 31 December 2015.