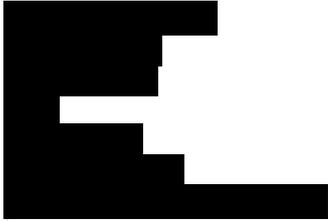


# Your submission to Clean Water



## Clause

What are your thoughts on the proposed swimming targets, for example, on the timeframes and categories?

## Notes

Great work, things take time, 2040 is not that far away, and there is a lot of work to be done in the mean time. I would caution the policy maker of setting far away deadlines, it would also be good to have medium term deadlines and short term deadlines expressed in the policy as in the stock exclusion plan.

## Clause

What do you think about the proposed amendments to the Freshwater NPS?

## Notes

This submission concerns the amendments to the appendix 2, page 72 being replacing it with page 73. E. Coli. the original (pp72) presents a page of data on E. Coli which by way of FORMAT is continuous with the preceding and following pages for other variables (Periphyton, Total nitrogen, etc). In the amended version (pp73) we have a new format which obfuscates the straightforward numerical values of exceedance by using proportional per cent values. We now have a ridiculous system of 5-10% of 540cfu... just use the values as a number don't put % in there. Laboratories do not return % values. call a spade a spade. Secondly the new guideline value of 540cfu/100ml is that of a partial body contact, the previous value (260cfu/100ml) was for full body contact. Redefining the guideline and claiming that it is still safe for swimming is against international standard (despite the policy claiming otherwise). the previous guideline resulting in a 0.1% to 1% chance of contracting a waterborne illness (gastro). the new guidelines have a 5%+ chance of contracting a waterborne illness. However lowering the standard will mean that more freshwater rivers and lakes fit into the standard of swimmable 90% of the time! This seems like a bit of circular logic; by redefining what the acceptable level for full body contact is with the acceptable level for partial body contact it means that we have to now redefine the word Swimming and tell off anyone doing freestyle when instead they should be wading.

## Clause

What are your thoughts on the proposed stock exclusion regulation, for example, the timeframes and stock types to be excluded?

## Notes

Great work, good short term deadlines and achievable goals. Within a freshwater management unit perhaps we can create a forum for reporting from farmers and regional councils so that data is shared between all farmers and we can work together to get stock excluded from waterways. I also think that some consideration should be given to stock shitting in non-permanent waterways (wider than 1m), as the policy makers admit, a lot of the exceedances for E.Coli occur during high-rainfall events and the resulting run-off into rivers/lakes. Shit in any non-permanent waterway (intermittent and storm flow) can still transfer pathogens into permanent waterways during these high-rainfall events...

## Clause

Do you have any other comments on the contents of the Clean Water discussion document?

## Notes

The focus of bring in economic considerations during a cost benefit analysis within communities is beside the point. The reason economic considerations should not be brought into considerations is that the economy is not real, while the land, water, and air is. Whatever the cost is of protecting the environment, it should be met. the environment is the life-support system that the economy depends upon. The economy does not hold precedence of the environment. (money does not grow on trees). the cost of mitigation or rehabilitation can be spread over time to reduce its economic harm on a community, but the action cannot be withheld for economic reason, the environment must simply be managed first. Our lives depend on it.

**You have elected to withhold your personal details from publication.**