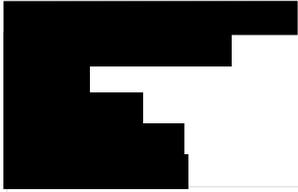


# Your submission to Clean Water



## Clause

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

## Notes

I would like a pre-election commitment from the Government that, when the National Policy Statement is finalised, it will include specific swimmability targets for each region, which can be independently enforced on councils by the Environment Court. E coli limit: I am concerned that the cutoff level for E coli (540) is so high - at the bottom of the C band in the 2003 Guidelines. Prefer a lower number e.g. 140 for swimmability. Swimmable: I support using the term 'primary contact for recreation' Enforcement: The '90% swimmable' target does not appear to be legally enforceable. Change will only happen if regional councils are required to meet these targets, not just have them as a goal. I support the new primary contact E.coli attribute table applying to all waterbodies, regardless of size. oppose the proposed amendments to the Human Health for Recreation attribute table, which would weaken the standard for primary contact recreation. The E.coli attributes need to be strengthened.

## Clause

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

## Notes

3.2: MCI: Support use of this for monitoring, but ask it become an 'attribute' in the NOF bands, as suggested by the L&Water Forum Sediment: This is a major contaminant but is not addressed by this or previous NPS14. Support multiple measures of sediment (e.g. accumulated as well as suspended) and having this as an attribute. 3.3 Maintain or Improve overall: I do not support allowing waterways to move downwards within a band and still call this 'maintaining quality'. I do not support allowing some waterways in a FMU to degrade while others improve, and still call this 'maintaining quality overall' 3.5 Economic Wellbeing: It can act as a get-out clause for industry/farmers. I object to this as it has potential to override positive outcomes for waterways. There may be short-term economic reasons to pollute rivers, however the regulations should not allow this. 3.8 Te Mana o te Wai: I do not support removing the term 'and provide for' from this section. The National Policy Statement should require regional councils to identify and protect any sites on smaller streams that are, or may historically, have been used for swimming I oppose the proposed amendments to Objective A2 and B1 referring to provision for economic wellbeing. If references or new provisions are to be included these must be drafted to ensure that water quality based on ecosystem and human health is the first priority. We oppose the inclusion of any new test that requires a balancing of environmental considerations against economic ones.

## Clause

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

## Notes

Timeframes: support Water bodies: support, including wetlands Alternative Option: I am concerned that this option may be used widely. Farm Environment Plans should encourage best practice, not exist as a method for avoiding stock exclusion on accessible waterways. Riparian setbacks: I believe minimum setbacks should be prescribed, in order to get the benefit to waterways from stock exclusion. Land types: How will the regulations deal with paddocks where a variety of angles exist e.g. flat and steep bits. Fencing the flat parts only will require many flood gates. I support effective riparian plantings and fence minimum setbacks as a mandatory requirement. I think the minimum setback be extended from 1 metre in cropping paddocks, to 5 metres. Realistically, 1 metre is not far enough at all. I would like to see the NPS require not just fencing, but also the planting of a streamside buffer strip inside the fence. The National Policy Statement should make clear that councils are obliged to give effect to its provisions by notifying plan changes within three years. Regional councils should submit maps showing their proposed FMUs to the Secretary for the Environment for sign-off as being in accordance with Ministry guidelines. References to economic well-being should be clarified so that water quality, environmental and human health are given the first priority. Sec 104 should be amended, or some other method found, to ensure that limits mean limits. Exceptions to the limits framework should only be decided by central government, using Appendix 3. A decision tool should be specified for assessing where the fencing requirement applies

## Clause

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

## Notes

6.2: I support development of good resources to prescribe 'best-practice' for fencing waterways and managing riparian zones.

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