

Your submission to Clean Water

George Dewar



Clause

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

Notes

It sounds wonderful to have 90% of rivers and lakes swimmable by 2040. I think a long time-frame (as this is) is reasonable where a large effort is required to achieve this goal. However, as noted separately, I am concerned about the new definition of swimmable.

Clause

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

Notes

It seems unreasonable to increase the limit of E.coli in an "excellent" river for swimming from 260 / 100mL to 540 / 100mL when this appears to translate to a risk of up to 5 percent per swimming experience of infection with campylobacter. For one in 20 swimmers to contract campylobacter seems terrible, and could actually dissuade some people from wanting to swim in rivers. Many other countries such as the U.S. and Canada appear to use lower values as guidelines or limits. This change appears to be buried in Annex 1 of the consultation document, and not explained in any way in the main document, so I am unable to find any explanation of the rationale behind the change.