

## **Submission to Ministry for Environment on NPS-FM**

I agree that you have correctly identified the problems currently associated with implementing the NPS-FW and that it needed to be amended. However I disagree with some of the values and measurements that are proposed.

### **National values and uses for fresh water - Te Hauora o te Tangata / the health and mauri of the people.**

The proposal is that that the minimum value for human health is secondary contact recreation. This implies that if I want to protect a reach of my local river so that my kids can swim in it safely, then I have to argue with my local council to do so.

This argument is backward.

The value should be full contact recreation which allows full immersion in water. This would imply that it is the responsibility of polluters to argue for the right to pollute. Given that they are the ones who stand to gain financially from water use then I believe it is the polluter who should bear the cost of being granted the right to pollute.

Council can argue via it's planning processes that certain water bodies are unlikely to reach this standard (such as urban drains etc) so that it then becomes transparent exactly which water bodies do not meet our value of full contact recreation. Local communities can then work together to enhance or improve these water bodies, which would be no bad thing.

Recommendation: That secondary contact recreation be replaced with full contact recreation as a national value

### **Appendix 2: attribute tables**

It is disappointing that Macroinvertebrate Community Index (MCI) or something similar is not intended to be used for monitoring and reporting on stream health in New Zealand. The Ministry of Environment website states:

*“Use of the MCI and QMCI is well established in New Zealand, possibly because, together with the SQMCI, they are the only comprehensive biotic indices based on tolerances of New Zealand macroinvertebrate taxa for assessing the health of stony streams.”*

It seems odd that on one hand you promote the use of an MCI yet on the other hand you decide not to make use of it.

Recommendation: That Macroinvertebrate Community Index (MCI) or something similar is included as part of the regime for monitoring river health.

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