

The proposed changes to the National Policy Statement for Freshwater Management are not enough to preserve or improve our rivers.

The lowest acceptable standard for water quality in our rivers should be that they are clean enough to swim in. Regional councils should use this as their standard throughout the country.

The water quality indicators for our rivers should include turbidity and periphyton measurements.

The indicators (“attributes”) for ecosystem health should include:

The Macro-invertebrate Community Index which is a well-used and understood measure of river and stream health to monitor changes in the number and diversity of aquatic insects such as mayflies and caddisflies.

A limit on nitrogen and phosphorus as nutrients. The proposed bottom line for nitrate is the level where it is toxic to fish and other aquatic life. This will not prevent nuisance algal blooms.

A limit on deposited sediment. Soil belongs on the land not in rivers. Sediment smothers spawning areas and habitats.

A measure for dissolved oxygen across a river, not just in relation to point source discharges. Dissolved oxygen is critical for life and can vary hugely between day and night.

Measures for estuaries. Estuaries are vital as fish nurseries and pathways and have important recreational and cultural values.

The proposed exceptions to the national bottom lines are too broad and would allow further pollution. Limit the exceptions to specific water bodies and list these in the National Policy Statement.