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[withheld]
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To:
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Submission:-
Proposed Objectives and Compulsory Standards for Fresh Water.

Summary:-The proposed changes to the National Policy Statement for Freshwater Management are inadequate:-

Ensuring rivers are clean enough to swim in should be a compulsory national standard for councils, not optional. E coli (or faecal coliform levels) which are safe for boating and wading are too high for rivers and lakes to be clean and safe for swimming. The compulsory national value for human and ecosystem health should be swimmable rivers.

Many recognised water quality indicators are missing. Councils need to monitor these indicators then New Zealanders will get an accurate understanding of the state of our waterways.

Include these national indicators ("attributes") for human health:

- Water clarity.
- Periphyton cover which is a measure of how much algae, bacteria and detritus is covering the river bed.

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. They can show up deficiencies in upstream controls of water quality.

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

One certain way to help protect our rivers is to ensure that we look after them and that the water is clean enough for ***swimming***, not just wading or boating. *Human health and our economy depend on safeguarding our environment.*

Overall comments

This should hopefully improve things, albeit very slowly –overall positive changes.

•Recap on key issues:

NOTE:- Objectives:

- An 'objective' is an **intended** outcome**-** not an immediate outcome.
- Thus, it should be made clear in Preamble that *Objective A2* means that water quality must be maintained or improved in each FWMU in the region.

Averaged approach to water quality:

- Guidance on determining the appropriate spatial scale for FWMUs should be given, with an upper limit of 'catchment**'.**

Partial population of the NOF attribute tables.-

- Establish ecosystem and human health as compulsory values in regional plans. The 'Bottom line' is much, much, too low.
- 61% of rivers are not swimmable. Swimming in rivers has been part of the pleasure of being a New Zealander. This is an important attribute to maintain.
- Invertebrates maintained at 80% is not good enough- we need to aim higher. Accepting extinction of 20% is not acceptable.
- The compulsory value 'ecosystem health' needs populated attributes for sediment or macro-invertebrates, despite their importance to ecosystem health.
- Government should at least provide narrative guidance for all key attributes, if numeric ranges are not yet available.

In the local environment here: *silt and nitrogen entering into the local estuaries has caused of large areas of mud to become uninhabitable- 'dead mud'. This has taken place in just a very few years-lately.*

Estuarine areas are considered to be more highly productive (about 4x) than the best farmland. Therefore, this end-result of lifeless-entropic mud needs to be more carefully considered when stating bottom lines upstream-(caused by farming and other practices).

ie. ***We allowing high pollution from one source of income/way of living to extinguish an even more productive downstream source, as well as an environment for plants, invertebrates, birds, fish etc.***

Downstream economic deaths would also apply to the collapse of the Nelson ***$multimillion scallop industry****; as well* ***marine farming*** *was badly affected until*

Takaka farmers *took the initiative and made a huge effort at refining their practices- (with fencing, bridging & planting- well done!).*
This takes large community input, farmer financing, as well as input from support services such as DoC, Fish and Game and Landcare and finance.

It should also be noted that locally the ***Sherry River*** *was very badly polluted, but with proper care (a local farmer initiative) with input from DoC plant specialists as well as Landcare it is now much improved- although not quite swimmable yet- it is hoped with a few more improvements it can become swimmable.*

Exemptions regime too permissive.
–A range of factors must be considered at all relevant points in the process, including the

- Timeframes should be set.
- *Issue*: Councils can already set long timeframes for improvement, so there is no need for exemption: This exemption is not necessary and should be removed.
- At least two monitoring sites per FWMU (or per catchment) should be required,and further guidance on determining what a representative site would be.
- If a FWMU is below the national bottom line, a council must plan for how to improve it.
- Bottom lines are a positive step, but consideration should be given to whether these are high enough standards.

Groundwater will likely become a concern unless improvements in water quality are hastened. Many communities are reliant upon groundwater for drinking and household purposes.

Thankyou for taking the time to read my submission.
I fervently hope and trust that I can look forward to better water quality for my grandchildren.
Elizabeth A. Bryant

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