

From: [withheld]

Subject: Submission 05053 - David Dowrick - Freshwater management

Date: Tuesday, 4 February 2014 9:06:16 a.m.

My views are as follows:

1. The averaged regional approach to water quality as it is is too complex. There should be a preamble in objective A2 that makes it clear that the water quality must be maintained or improved in each freshwater management unit within the region.
2. There should be national guidance on how a freshwater management unit is defined. Given these fwmu's are the basis for the whole management approach to freshwater, they should be nationally defined to ensure consistency in implementation and monitoring across the councils.
- 3 The attributes in the national objectives framework attributes tables should all be nationally defined. Where it is no yet possible to set numerical attributes, the government should at least provide guidance as to how they will be set. This will help achieve the government's objective of a nationally consistent approach to freshwater.
4. The exemptions regime around compulsory values and national bottom lines is too permissive.

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