

**From:** [ withheld ]  
**To:** [WaterReformPublicConsultation](#)  
**Subject:** Submission 05144 - Hamilton Anglers Club - Proposed changes to NPS on Freshwater  
**Date:** Tuesday, 4 February 2014 2:33:19 p.m.

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Submission by Hamilton Anglers Club on proposed changes to National Policy Statement on Freshwater

- 1) We are concerned at the proposed bottom lines for ecosystem health. We consider that they are too low to sustain aquatic life.
- 2) We think that the ecosystem health attributes (such as temperature) should be applicable to all freshwater bodies, eg lake environments, as well as to rivers.
- 3) We are especially concerned at the proposed bottom line of 1.3mg/litre for mg/NH4+N and consider that level to be toxic to fish life. We also have doubts that the levels set for other attributes will sustain aquatic life.
- 4) We do not support secondary human contact as a meaningful measure of water quality, and prefer that primary contact is the principal measure
- 5) We want to see minimum environmental flow included as a measure in regard to Section 2. Unnaturally dry rivers and streams usually reflect total failure of water allocation and management policies.
- 6) Draft Policy CA3 is of concern. Setting levels below national bottom lines for convenient periods is a process open to abuse by councils who have already failed in their management of freshwater. Freshwater systems below national bottom lines should be prioritised for remediation.
- 7) Policies A4(3) and B7(2) ignore existing pollution and over abstraction. They and Policy A4 collectively undermine the NPS.
- 8) 2030 is the time when reforms are anticipated to be in place. For some waterways, with current rates of agricultural intensification, this will be too late.

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Hamilton Anglers Club

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