

From: [Peter Ireland](#)
To: [WaterReformPublicConsultation](#)
Subject: Submission 05125 - Peter W Ireland -
Date: Tuesday, 4 February 2014 1:29:21 p.m.
Attachments: [image001.jpg](#)
[image002.png](#)
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[image004.png](#)

Dear sir Madam,

I have only just become aware of the very short time frame that has been allowed for consultation, which closes today. The lack of publicity and timing over the summer holiday period is very poor. Makes a mockery of the "Consultation".

I have worked in the water area for many years and have felt frustrated by the lack of standards that apply particularly to some discharges to fresh water. For example TLAs are required to have discharge consents for Waste Water Treatment Plants and meet a set of discharge standards, and the Transport Agency has standards for stormwater treatment and in recent years there has been a concerted effort to provide stormwater treatment on major road projects. Some Regional Councils have rules and standards requiring stormwater treatment. These standards usually require a qualified professional (Registered Engineer) to have designed the treatment system. Conversely there is very little control of in particular Dairy Farm fertilizer inputs and Effluent discharges. Only 1 Regional Council requires Dairy farms to have treatment system designed by a qualified professional (Registered Engineer).

The critical points I wish to make are;

- The implementation period is far too long. Regional Councils must be required to implement the policy within 5 years, at worst by 2020, not 2030.
- Nutrient standards must be compulsory.
- Nutrient Standards must include total Nitrogen and total Phosphate / Phosphorus.
- The minimum nutrient standards as proposed are too low
- The E.coli standard must be the safe swimming level.
- Direct and indirect Polluters should be heavily fined for failing to comply with the standards.

Please note that this is my own personal Submission not that of my employer.

[withheld]

Peter W Ireland [withheld]