

Dear Sir/Madam,

We would like to submit the following points regarding the NOF:

We support the aim of the NOF and national bottom lines to improve, or maintain where good, water quality and life-supporting capacity of our waterways. However, there are a number of points of concern:

- Several of the new limits (eg nitrate) allow relatively poor water quality and the limits will become a “pollute up to” limit and a reason to allow more discharges. We would like to see provisions strengthened to ensure that rivers with good or excellent water quality stay that way.
- It has to be made explicit that the nitrate limit is only for toxicity and that lower limit to control periphyton growth will often be needed.
- For waterways that are physically swimmable (ie deep enough for long enough) there should be a default limit for primary contact recreation standards (ie the “Microbiological Water Quality Guidelines”) that should apply everywhere unless in exceptional circumstances that the regional authority has to identify and put out for public submissions. It is not good enough to rely only on a limit for secondary contact and wait for decades before Councils identify the swimming rivers.
- Good quality habitat for fish and invertebrates is fundamental needs consideration.

There needs to be more money available for stream restoration, in particular for plants for riparian planting. High stream temperatures and low dissolved oxygen are key issues in many small lowland streams around NZ and the situation has not improved much over the last 20 or more years. While there have been some great projects around NZ, most of them have had community groups invest the time to raise the plants, plant them and weed around them. However, the percentage of streams restored is relatively low (except in the Taranaki region) so we need to push this further into areas where the community interest in stream restoration is lower. Some regions such as the Waikato and Manawhatu have received good money for this sort of work, but most other regions in NZ have missed out. Regions such as the West Coast (South Island) do not even have fencing materials supplied by the regional council for stream or wetland protection.

Yours sincerely,

Trevor and Myffie James

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