

**From:** [Wayne Parsonson](#)  
**To:** [WaterReformPublicConsultation](#)  
**Subject:** Submission 05115 - Wayne Parsonson - Freshwater Reform Submission  
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Submission from : Wayne Parsonson  
[ withheld ]

This submission will convey that the proposed compulsory and voluntary fresh water standards are too permissively low and the implementation time too long to be adequately beneficial for our waterways . Though my submission does not , for lack of scientific resource , specify alternate standards parameters , I want it to be read in support of those submissions that do specify stronger standards against fertiliser, nutrient and storm water pollutant levels in our waterways and shorter time frames for implementation .

Human Health Standard : I want this compulsory standard to change in favour of an E. coli level allowable for full immersion swimming not just risk of infection from wading or boating. And shorter implementation timeframe.

Ecosystem Health : within this compulsory standard I want limits for nitrogen / nitrates and phosphate / phosphorus levels added to nutrient level limits . The proposed levels should be changed from those classed "moderate impacts " to low impacts . And shorter implementation timeframe.

I am aware that Switzerland cleaned up its waterways successfully by including phosphate and nitrogen level limits in it's regulatory framework . I cannot emphasis enough how important it is for us to do the same if we are serious about cleaning up our waterways . Land based industry must be required to change and adapt to the challenge of clean waterways . I cannot understand how the Ministry for the Environment could be in the process of proposing such weak and ineffective standards ? ? But I do note the involvement of the Ministry for Primary Industries .

Both Ministries will be aware of the recent tabling in Parliament of the Parliamentary Commissioner for the Environment's report on fresh water. It made clear that current industry practice and both current and proposed legislation in this area will not be enough to protect our waterways . Especially in regard to industry intensification plans which have been signalled in the public arena. This report alone should be enough to require a significant strengthening of the proposed legislation .

We need a circuit breaker in this realm and this Freshwater Reform package must be it. The whole country Maori and Pakeha , I think , is solidly behind cleaning up our waterways . That makes it politically possible . Industry submissions advocating a weaker regime than I am advocating need to be seen for their self interest and resistance to change. I envision a huge benefit to industry in the long run should we collaboratively succeed in cleaning up our waterways in the realm of authenticity of Eco marketing and leading edge best practice . In other words, land based industry will continue to thrive and make it's all important contribution to our economy amongst clean waterways . This aspect must be argued successfully within the Ministry for Primary Industries.