

From: [Stuart Payne](#)
To: [WaterReformPublicConsultation](#)
Subject: Submission 03005 - Stuart Payne - Proposed amendments to the National Policy Statement for Freshwater Management 2011
Date: Saturday, 1 February 2014 4:53:04 p.m.

Below is a submission on the document:

Ministry for the Environment. 2013. Proposed amendments to the National Policy Statement for Freshwater Management 2011: A discussion document. Wellington: Ministry for the Environment.

Submitter: Stuart Payne

[withheld]

Submission.

On the matter of **water quality** I submit the following:

1. As a minimum, water quality in rivers should be clean enough to swim in, not just clean enough for boating and wading.
2. The proposal says "Overall freshwater quality within a region must be maintained or improved." This allows some areas (or "fresh water management units") in a region to deteriorate, as long as the overall water quality is maintained or improved. I consider that it should be made clear that water quality must be maintained or improved in *each* fresh water management unit, not just overall.
3. The national indicators for ecosystem health should include limits on sediment and should require the use of Macro-invertebrate Community Index surveys which are an important indicator of stream health.
4. While the proposal to establish "bottom lines" is to be applauded, I consider the levels set for the "bottom lines" are far too low to adequately protect our freshwater. The bottom lines for nitrates and ammonia are only just above toxicity for aquatic organisms, so they can hardly be said to be protecting ecosystem health.
5. Having established national bottom lines, exemptions to them should be extremely restrictive. This does not appear to be the case for the proposed exemptions to the requirement to meet the national bottom line values; they appear to be too loose and permissive.

end of submission