

**From:** [Phil Pearson](#)  
**To:** [WaterReformPublicConsultation](#)  
**Subject:** Submission 03086 - Philip W. Pearson - submission on National Policy Statement for Freshwater Management  
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Submission on: The National Policy Statement for Freshwater Management

To whom it may concern

This is one area where a set of 'national standards' is not only desirable, but critical. These must be robust enough, however, to genuinely protect or enhance fresh water quality, and not by sleight of hand actually allow further deterioration.

Thus, we respectfully submit these further comments on the proposals.

Water **quality should be maintained or improved in each fresh water unit**, not just 'overall'.

Ecosystem health should be **authentically monitored** i.e. Macro –invertebrate Community Index Surveys should be required, and there should also be **limits on sediment**.

The '**bottom lines**' on nitrates and ammonia are being set **too low**. Please increase these to a level which would genuinely protect ecosystem health.

The **exemptions** being proposed are far **too loose and lenient**. Exemptions on meeting 'bottom lines' should surely be extremely rare, rather than as current proposed likely to be a common go-to for a variety of interests.

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