

Water Quality

- As a minimum, water quality in the rivers should be clean enough to drink and swim in, not just clean enough for boating and wading.
- water quality must be maintained or improved in *each* fresh water management unit, not just overall.
- The national indicators ("attributes") for human health should include water clarity and periphyton cover
- The national indicators for ecosystem health should include limits on sediment and should require Macro-invertebrate Community Index surveys which are an important indicator of stream health.
- While it is great that "bottom lines" are proposed, we feel these levels are set far too low to adequately protect our freshwater. The bottom lines for nitrates and ammonia are only just above toxicity for aquatic organisms, so can hardly be said to be protecting ecosystem health.
- There are proposed exemptions to the requirement to meet the national bottom line values. These exemptions are too loose and permissive

Monitoring

- There should be at least two monitoring sites per FWMU (or per catchment), and further guidance on determining what a representative site would be.

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