

**From:** [Nic Twaddle](#)  
**To:** [WaterReformPublicConsultation](#)  
**Subject:** Submission 02077 - Nicholas Twaddle - NPS-FM submission  
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To whom it may concern,

As a raft guide who has earned a living from being on and in our national rivers I feel compelled to submit on the NPS-FM.

The NPS-FM needs to be amended to preserve our clean rivers and improve the health of polluted rivers. The current NPS-FM appears to make it acceptable for our rivers to be polluted. It is a case of changing the monitoring systems to make everything look ok when the opposite is true in many cases.

The compulsory values should be that rivers and streams must be healthy enough to swim in and eat fish from. That is what our rivers are for. They are not dumping sites for pollution that we can only boat on top of. Swimming and fishing is part of the fabric of being a New Zealander and should not be compromised. Our environment needs to be in balance. The level of dairying nitrates is not in balance they are dragging our fresh water eco systems down.

The new NOF should contain biological measures such as MCI macro invertebrate index and fresh water fish surveys as these are the most robust measures of the health of rivers, this is recognised internationally.

The nitrate levels proposed as a bottom line are far too high they put our waterways in jeopardy and will make it difficult for these eco-systems to recover to full health. The nitrate levels proposed would make our rivers some of the most polluted in the OECD before we were concerned about them. Surely if we are to believe our marketing of 100% pure we should set our sights to have the most pure streams, rivers and lakes in the OECD...? This would mean setting a much lower acceptable level of nitrate toxicity.

If we want a point of difference in the world market it should be that of a nation that is only willing to turn a profit when the environment is also preserved. Produce less milk at a premium price in return for preservation of our environment. Long term preservation of our planet is the ideal that will be most highly valued. We need to change our approach before it is too late.

To reduce nitrates entering our waterways we should be adopting the measures outlined in the Nitrate Directive (1991) issued by the European Commission. As well as the guidelines for Nitrate Vulnerable Zones adopted by the UK. There needs to be a regulatory tool to discourage excessive nitrates entering our waterways through poor farming practices.

Sediment levels should also be recorded. This has been recorded in the past, why now is it being dropped? So that it will be easier to pollute? If you want credibility and an ability to compare current status of bodies of water then you must have measures that are consistent with those from the past. Therefore keep sediment levels as a measure.

Please ensure that the amended NPS-FM preserves our right as New Zealanders to swim in and eat fish from our rivers, streams and lakes this is a value that is central to my identity and is a right of every New Zealander yet to be.

Nicholas Twaddle

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