

# Your submission to Clean Water

John Highton

## Clause

What are your thoughts on the proposed swimming targets, for example, on the timeframes and categories?

## Notes

I am a fisherman and I have suffered two significant gastrointestinal infections from fishing in rivers. One was from the Utahina Stream in Rotorua and the other was from the Mataura River in Southland. Both affected me quite severely. I am concerned that the E Coli permissible level is set too high in the National Policy Statement. Even fishing rivers involves occasional immersion (falling in) and there is regular exposure to the water through splashing with activities such as casting and landing fish. A 1% risk is not acceptable as this means I could expect to be infected every time I make one hundred trips. I would therefore suggest that the national acceptable level be set low, at a healthy level, such as less than 260 organisms/ml. Even this allows for up to 1% risk from immersion at the 95th centile.

## Clause

What do you think about the proposed amendments to the Freshwater NPS?

## Notes

As a fisherman I think the allowable standard for oxygen is too severe. It allows for loss of fish and macroinvertebrate species. The minimum level should be as for B. I am concerned that we are starting to see impacts on iconic water bodies like lake Wanaka with "lake snot". This makes me think that rigorous levels for nitrogen and phosphorus are required. The current allowable level for nitrogen is near the immediate toxicity level and is far too high. I think it should be less than 3.5, B. I think the level for phosphorus should also be set lower.

## Clause

What are your thoughts on the proposed stock exclusion regulation, for example, the timeframes and stock types to be excluded?

## Notes

There is much to be recommended. I support exclusion of stock from waterways. I think that the NPS should require specified margins around fenced waterways. Smaller waterways should be fenced to allow a margin of rough growth sufficient to allow filtration of water through weeds to get to the waterway. For fishable waterways sufficient margin should be allowed for easy walking access up the waterway. A number of waterways that are currently fenced have the fencing, including electric fencing, so close to the water as to make access along the water margin difficult and hazardous. Requirement for fencing should come with a specified minimum margin for this to be effective and to allow access along waterways. I see problems with the requirement for waterways to be permanently flowing for them to be fenced. Some of the waterways that I encounter flow intermittently. This is because they enter tidal waters and have barriers to exclude water flowing back up the waterways when the tide comes in. Such waterways still warrant protection as they discharge into significantly valuable swamps, lakes, estuaries, lagoons and rivers in their estuaries where they are tidal. This is a practical point that needs to be addressed.

## Clause

Do you have any other comments on the contents of the Clean Water discussion document?

## Notes

I support moves to stop over-allocation of water. This should include establishment of sufficient minimum flows to allow support of biologic systems in waterways. Fishing seems to have been struck out as a mentioned activity. This should be reinstated. Most of the regulation seems to apply mainly to new allocations and activities. There should be provision for regular review of existing permissions and allocations. Farm environment plans are mentioned in connection with the Manawatu river. Such plans should be actively encouraged for example with tax deductibility for payment for such a plan. Mention is made of Regional Councils being required to monitor macro-invertebrate populations but I cannot see specifics around this suggestion. It is a good suggestion. It is something that should be required with any significant intervention. An example is the current weed spraying programmes carried out in lakes such as Wanaka and Dunstan. These have the potential to substantially impact the health of the environment in the margins of lakes. Such activities should be monitored with careful documentation of impact on macro-invertebrate populations. I strongly support monitoring these populations to monitor and ensure the life-supporting capacity of waters. There should be more detail around this form of monitoring. I strongly support the provision of maps detailing the health of waterways. This information should also be made available on the walking access NZ website.