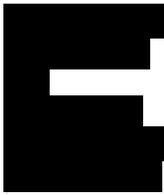


Your submission to Clean Water

 Angus Robson

Clause

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

Notes

I wish the following: 1. swimmability targets to be enforceable in the Environment Court, should Regional Councils fail to meet them. 2. swimmability targets to meet internationally accepted norms being 126 ecoli per 100 ml and black disk clarity of 1.6m. 3. swimmability goals to be brought forward to 2025 and 2035 respectively. 4. Historic swimming sites should be identified and specially protected and/or restored by Regional Councils.

Clause

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

Notes

Where the proposals provide for weakening of the ecosystem health and reduction in primacy of water quality vs economic value, I disagree with them. I wish the NPS to be clear that water quality in all instances may only be maintained or enhanced, per water body, i.e. not aggregated or averaged with any other water body.

Clause

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

Notes

Dairy cattle and deer should be excluded including a planted setback of 2 - 5m depending on land contour (steeper land should have more setback). Beef cattle must be excluded, but the means and degree of exclusion should vary depending on stock intensity, land contour etc such that erosion and waterway disturbance are limited to values required to meet water quality targets. Sheep do not require exclusion.

Clause

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

Notes

1. Regional Councils should be required by law to give effect to all water quality improvement provisions in the NPS. Plan changes should be notified within 3 years of the NPS taking effect. 2. FMU sizes should be limited to prevent Councils using unders and overs to game water quality averages. The NPS should be clear that NO water body in an FMU can be allowed to deteriorate and they may only improve. The rule that all water bodies' quality shall be maintained or enhanced must be stated in the NPS and enforceable in law. 3. Exceptions to the limits framework using appendix 3 must be decided at a national level i.e. not at the discretion of Regional Councils. 4. The NPS should not require any regard be given to allocation of nutrient in Regional plans. Allocation of pollutants is not a suitable means of reducing water pollution.