

Your submission to Clean Water

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Clause

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

Notes

The cutoff level for E coli (540) is too high. That level is a C band in the 2003 guidelines. The 90% swimmable target appears not to be legally enforceable. If these are 'goals', no change may happen as regional councils are not required to meet the levels as targets. I would prefer a lower number e.g. 140 for swimmability. The term does not cover primary contact for recreation such as waka ama

Clause

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

Notes

3.2. MCI: I ask that an attribute in the NOF bands as suggested by the Land & Water Forum. This is a major containment but is not addressed. In this area measurement of sediment is crucial. 3.3 Maintain or improve overall - is a risk that allows waterways to move downwards within a band . I prefer the removal of 'overall' as some waterways may be degraded while others improve. 3.5 Economic Wellbeing; can be a general out for industry and farmers. There maybe short term economic reasons to pollute rivers however the regulations should not allow this. 3.8 Te Mana o te Wai: I do not support removing the term 'and provide for' from this section

Clause

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

Notes

Riparian setbacks: a minimum setback should be prescribed in order to get the benefit to waterways from stock exclusion Alternative option: I am concerned that this option may be used widely. Farm Environment Plans should encourage best practise