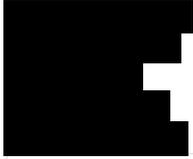


# Your submission to Clean Water

Philip Wrigley



## Clause

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

## Notes

The target should be 100% swimmability, with intermediate targets on the way. This is needed to avoid cherry picking, where difficult challenges are hidden away in the remaining percentage. As the targets are approached small water bodies outside the current targets should be included. That is, if the targets are reached when 2030 or 2040 are reached, the job should not be considered done. Similarly cyanobacteria standards should be included as measuring techniques improve. 2030 is a long time away: the public need to know that progress is being made before that time through reporting and auditing of steps taken by independent bodies. The E.coli measure is too narrow. It needs to be extended so that other factors that affect swimmability and ecosystems are dealt with. For example, sediment load, flow levels affected by irrigation and phosphorous and nitrogen levels. The goal must be healthy waterbodies, not specific levels for one measure.

## Clause

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

## Notes

Nitrogen and phosphorous targets need to be set nationally to ensure progress is made in ecosystem protection to match swimmability tests. Economic well being of communities should not be considered as this is vague, is likely to be interpreted in purely financial terms and is inconsistent with the objective of improving the natural environment.

## Clause

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

## Notes

Beef cattle should be subject to the same requirements as dairy cattle as the effects are the same. A fine of up to \$2 million should be imposed. The proposed \$2000 does not reflect the economic realities of the industry. It is less than trifling. Landowners unable to meet the requirements should remove their stock, not be given an exclusion via a plan with their regional council. Stock crossings need to be bridged or culverted. Once in place, they need to be the crossing means used. That is, less than weekly crossings must also be subject to the regime for its goals to be achieved. It is unrealistic to enforce a given frequency of crossings. Inspections can only work if all signs of streambed crossings can be taken as non-compliance. Fines of up to \$1 million need to be in place for transgressions to make an economic change to incentives.

## Clause

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

## Notes

Funding needs to be allocated to ensure progress towards the targets.