

SAVE THE RIVERS MID-CANTERBURY INC.

C/- Mr. Geoff Ackerley
77 Trevors Road
Ashburton
Ph 03-308-7718
E-mail: ackers@xtra.co.nz
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The Commissioners
Land and Regional Plan Hearings

RE: SUBMISSION ON THE LAND AND WATER REGIONAL PLAN

Submitter number 18

Save The Rivers Mid-Canterbury Inc. are unable to make a presentation at the hearings but we appreciate the opportunity to submit a letter, which summarizes our stance on key issues, to the commissioners. In doing this we would like to stress that we stand by our original submission and assume that the detail of its contents will be seriously considered by the commissioners.

Our organization has been actively involved with issues related to the protection and enhancement of our local environment over an extended period of time. In particular we have taken an active role with respect to the protection of environmental values on the Ashburton River. We have presented our views to the Zone Committee on more than one occasion and support objectives related to the improvement of flows in the Ashburton River. While the emphasis of our feedback has been related to the Ashburton River much of what has been in our submissions is also relevant to other waterways, for example the Hinds River.

We remain concerned that the environmental values which we consider to be important for the Ashburton Zone, particularly the Ashburton River, could be at risk if they do not stay as a top priority for the plan. Meetings with the Zone Committee clearly identified the fact that the Ashburton River is over-allocated and steps need to be taken to ensure the river mouth stays open; this will only be achieved by considering the river as single entity, from the mountains to the sea.

The fact that flow variability is a key requirement for the retention of an outstanding braided river needs to be kept in mind at all times. However all of the requirements for a healthy river need to be considered as part of the plan.

These include:

- The setting of minimum flows. We support the target of a minimum flow of 10cumecs at SH1 for the Ashburton River and believe steps should be taken to ensure that this target can be met as soon as possible. The 6cumec flow for the Ashburton which has been identified as a first step is an absolute minimum flow which will keep the river mouth open longer and allow for a productive fishery (source Todd, Scarf and Webb). The minimum flow in the river needs to be lifted to 10cumecs in 2022 because this is the 5year average MALF which is an internationally accepted low flow standard. Much has been written about the river being over committed to abstraction

and this becomes quite clear when the figures are presented. We believe people in town have an interest in water and their interests should be considered. The values associated with water are not just to satisfy a farmer or his banker but to meet the values of all the community, after all this is what CWMS is about.

The setting of both the initial 6cumec goal and the longer term goal of 10cumecs must be cemented into the plan.

- The setting of a flow sharing regime. This ensures that there will be an acceptable degree of flow variability in the river.
- The setting of an abstraction cap. The River needs natural flood events in order to maintain a high level of environmental health.
- No dams on the river. These restrict the ability to maintain natural flows.

Presentations to the Zone Committee and our submission identify the need to take practical steps to improve flows in the Ashburton River. Any efficiency gains need to result in savings being returned to the river. Some of the measures we have identified include the closing of inefficient stock water races which contain low quality water, reviewing existing groundwater consents, exploring even better use of RDR water.

We are particularly concerned about the lack of meaningful movement with respect to stock water systems. It has been well documented that the open stock water systems that draw up to 5cumecs of water from the Ashburton River are inefficient with only about 4% being consumed by animals. Because this is a first priority use and is grossly inefficient it impacts on irrigators and environmental flow limits. In our view the ADC are dragging their feet so much so that it may be years before the river sees any benefit from stock water savings. Many farmers in the district now have irrigation, wells, ponds or open races and so have a source of stock water. They are not using the stock water system and could easily and inexpensively adapt their stock water supply. Delays in making changes are not through technical difficulty because much of the change would be easy technically. The limit in our view would appear to be lack of motivation and, to a modest extent, cost. Until surveyed we don't know what the actual usage and demand is and costs while bandied around have never been justified.

We believe that we are not 'anti-irrigation'; it is just that in recent times there has been an over-emphasis on irrigation. Save the Rivers Mid-Canterbury believes that the needs of the river now must come first. It needs to be remembered that our rivers have recreational values and that these are a key component of what New Zealanders consider to be important for life in this country. It needs to be remembered that the Ashburton River has supported bird and fish life for thousands of years; taking care of the river needs to take priority over other uses of river water.

While much of our submission relates to water quantity the issue of water quality also needs to be considered. The plan needs to consider both aspects in terms of the environmental health of our waterways.

Save the Rivers Mid-Canterbury Inc. would like to make it clear that it is important that, no matter what details are in the plan, residual flows are the main consideration and we need to understand what the plan means in terms of these for the river. In our lifetimes we have seen significant reductions in populations of various fish species and we look to the habitat, the deterioration in the health of our streams both as to quality and quantity as the reasons. We question societal values and where greed seems to be taking us. We believe our economy will only survive if it is environmentally sustainable.

