

SUBMISSION ON THE PROPOSED LAND AND WATER PLAN

In person submission of Jane Demeter (Submitter 348)

10 April 2013

1. Thank-you for the opportunity to present to the hearing panel in person. As a layperson and community member it is disappointing to see so few individuals appearing in person to share their views as this is such an important plan for Canterbury. As a New Zealander who was raised on a farm that bordered the Hurunui River not far from the mouth and who lived offshore for some time, each subsequent return visit to New Zealand in the 1990s and early 2000s left me increasingly concerned about the health of our Canterbury waterways. Since returning to NZ in 2003 I have tried to become informed about the state of our waterways and opportunities for improved outcomes.
2. In my view it is beneficial that you have the views of many technical experts to augment the science of CRC as this plan was put forward in a very short period of time. Staff did all they could to fully develop the proposed plan but the time restrictions of the ECan Act made that challenging.
3. My understanding is that this portion of the hearing deals only with the Objectives and Policies and leaves the rules to the Group 2 section on farming.
I will take my written submission as read and take any questions you may have regarding that document. Rather than going through each point I will focus on what I consider the prime issue: water quality, with a few thoughts on wetlands and the relationship of sub-catchment plans.
4. In my view all well beings are at risk if this plan does not get water quality and associated limits right. Much will be made in the Group 2 hearings about economic impacts but in the end the economy is supported by the environment. I believe it is undervalued for the ecosystems services provided to the economy.
5. I support the intent of this plan to address cumulative effects of land and water use and to work toward limiting the already significant effects of land use generated diffuse pollutants including nutrient leaching. Lowland streams and urban areas have high microbial loads. Drinking water standards are not met in some rural communities resulting in increased cost to those communities. Canterbury has 40% of recreational bathing rivers sites that are unsuitable (Ford 2012). Many wells have increasing nitrate nitrogen concentrations (29%) and with the lag time of groundwater movement we are likely to see further increases from recent land use practices.
6. The evidence of experts Dr Young and Dr Death indicate to me the widespread trend of declining waterways health across Canterbury. The plains and lowland streams would seem to have less healthy water ways and these are the areas that will likely see increased land use change and potentially further compromised water quality. Given the lag time of previous land use activities and land use changes underway it is likely that these trends will continue unless land uses practices change.
7. Table 1 has been the subject of much discussion including that some consider it “aspirational” (s42a report CRC). If we are to see water outcomes maintained and preferably improved I believe we need limits set in this table that will deliver those outcomes and to effectively implement the National Policy Statement on Freshwater. The evidence of Dr Death of F&G at para 22 makes a very strong statement:
“Given the large body of evidence demonstrating the detrimental effects of agriculture on waterbodies worldwide, data and models from Canterbury streams and rivers, it is, I believe, undeniable that agriculture is having a significant adverse effect on many of the Region’s waterbodies. If the decline in water quality and ecological health is to be halted, an effective management regime needs to be put in place that ensures the instream effects from intensification of agriculture do not result in physicochemical conditions outside the limits I have identified in Table 1a.”
I endorse the Fish and Game (F&G) proposal of Table 1a. It appears to me to be better able to deliver the required outcomes with its additional Management Units and refined numerical limits that refer to earlier work done by CRC (Hayward 2009). My understanding is that this table will still allow for some degradation of

lowlands streams with these proposed limits.

I support the F&G methodology proposed for setting flows and allocation requirements and the proposal that the same approach of Table 1a be applied to Table 1b.

The F&G proposal of Schedule XX to identify values of waterways and their relative significance has merit in my opinion and should be incorporated in to the plan. I would suggest that it be further developed by CRC beyond sports fish, game birds, white-water and jet boating and include mahinga kai, wahi tapu, native fish, birds, amenity, outstanding landscapes, natural character values to name just a few along with making the list of named waterways more comprehensive. This well thought through method would appear to be more effective in delivering the needed outcomes to support the objectives that they have listed.

8. Stronger nutrient load limits are need in this plan. These limits should not be able to be weakened by sub-regional plans as is the current proposal but should be bottom lines that sub-regional plans can improve on but weaken. Experts Familton and Percy have put arguments forward that this approach does not meet the requirements of the RPS and NPSFW. The current proposal has sub-regional plans trumping the regional plan. In my view the regional plan should provide certainty to landowners and prevail over the sub-regional plans. Limits should be determined by technical panels guided by good science. The collaborative process should be used to determine how to achieve those limits. Particular regard should be given to the vision and principles of the CWMS. A “regional approach” is one of the CWMS principles. It follows that first order priorities should be given more regard than secondary.
9. Proposed additional objective: “The significant indigenous biodiversity values of dryland ecosystems are protected from water use on adjacent land.” Buffer zones should be required around these sites where the width of the zone is determined by the site specifics. e.g. soils, slope
10. Wetland loss in Canterbury is significant – over 95% with some areas as high as 99% - Hurunui (CRC). These are rare and threatened habitats that need protection. All wetlands should be protected (p54 Gerbeaux). The F&G proposal for Objective 3.9 “Preservation of the natural character of lakes, rivers and wetlands and their natural processes, and protection from inappropriate use and development.” would better support the requirement of RPS 7.2.1 regarding natural character of wetlands.
Objective 4.80 does not provide sufficient protection for waterbodies, particularly wetlands given the dire situation in Canterbury. Offsets clause has insufficient guidance and in my view like for like is extremely difficult.
11. Qualification: Ashley River has 2 Fenton Reserves not nohoanga.
Fenton Reserve: (North Pegasus Bay Coastal Management Plan)
Fenton Reserves are similar to nohoanga sites with an extra component. In addition to camping sites, Ngai Tahu has a customary fishing entitlement which is a temporary right to use a specific portion of riverbed for non-commercial customary fishing. The six Fenton Reserves are 100-metre strips of rivers and lakes in Canterbury valid for 210 days a year. The reserves cover only half of the riverbed channels. The Fenton Reserves are available for use only by the people of Ngai Tahu who are the descendants of the owners of the original fishing reserves, or their invitees.

Thankyou.