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Environment Canterbury Long Term Plan 2018-2028

SUBMISSION from

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I **do** want to speak to this submission at the hearing.

Regional Leadership.

While I appreciate the efforts of ECan to improve compliance and monitoring I believe this is an area where more resourcing is needed. Ecan's own rules need to be followed and the degradation of our waterways and biodiversity losses caused by non-compliance not continue due to a lack of oversight and consequences.

One area of specific concern is the lack of monitoring of currently permitted activity. I understand 'high risk' activity only is monitored. I would like to see random compliance enforcement being funded over a broader spectrum of activity.

Freshwater Management.

I am truly excited to see that you intend to look seriously at historic consents which are now contributing to what many term our "freshwater woes". This is a topic that has come up frequently in conversations I have had with a range of people and it has concerned many that these historic consents are causing over-extraction and biodiversity impacts. Your approach of calling in consents so that current ecological parameters/minimum flows have a chance of being met seems entirely appropriate and sensible.

Biodiversity and Biosecurity.

It is heartening to see the aim for a step-change in effort on terrestrial & freshwater biodiversity to attempt to halt the cataclysmic slide we have been experiencing in Canterbury. I urge you to ensure funding matches this effort. When the biodiversity funding was cut I was dismayed knowing how much unmet need there was and understanding that it had been taking time for NGOs and community groups to orientate to the processes and possibilities on offer from the Immediate Steps and Biodiversity Funding.

There are some shifts in the way these funds are delivered that would help our sector to engage with quality conservation work and support our skilled people working in this field. We cannot continue the over-reliance on volunteerism and ECan could help within Immediate Steps as follows.

- Under the current Immediate Steps funding structure it is often very difficult for charitable organisations to provide the required 1/3 co-funding or in-kind donation to get projects off the ground, particularly if the landowner is unable to contribute financially / the landowner is the Crown. For NFP organisations the co-funding requirement should be waived, as there is no personal gain to anyone within the NFP organisation from the funding.
- Project management costs should be higher than the current maximum of 15% of the total project (which is usually provided in-kind by the NFP organisation anyway), and allow for funding of required skills such as from a suitably-trained person e.g. freshwater ecologist for more technical projects.
- Some resource consent fees (e.g. for earthworks or protective fish barrier installation) should be able to be covered by Immediate Steps funding, when not already required by the landowner under current regulations;

- and also the time/support needed to prepare the funding applications should be able to be covered by Immediate Steps funding.

To genuinely produce a step-change in this area we need what is being termed 'joined up thinking'. The silo mentality local government agencies have seemed locked into in the past must stop. I note this is your intention referenced more than once in the consultation document and I applaud this.

While I approve a focus on braided rivers and wetlands I would like to see more resourcing for marine biodiversity work. The connectivity between freshwater, terrestrial and marine is becoming more recognised. Groups I work with are consciously moving into more marine work and need support to do this. 25% of the full-time work of a specialist marine person on your staff is devoted to marine. I implore you to increase this commitment. Over the next 3 years, let alone 10, I believe the focus on marine will intensify dramatically in the wider community and ECan should be in a position to respond.

Wetlands are an important tool in the fight against climate change and its impacts. We have capacity in Christchurch to restore space into wetland and I urge you to consider ways ECan can actively support this.

I urge the use of ECan lands on which to restore biodiversity values and to model what can and should be happening to others, including the city and district councils and LINZ. I refer you to work being done on the riparian area of the Waimakariri near Coutts Island led by an ECan Parks and Reserves staff member. I know you are working in other areas as well and encourage you to do more of that work. It is relatively low cost particularly when it involves partnering with other groups like North Canterbury Forest & Bird.

I note that in the recently developed Regional Pest Management Strategy Russell lupins are listed as a target species. I draw your attention to a developing community effort to work on this problem in the Upper Waimakariri catchment including Arthur's Pass later in 2018 and urge you to help this effort.

Weeds in general are concerning many people whom I associate with. The Waimakariri Environment and Recreation Trust of which I am a trustee has written to agencies asking this be addressed. While the success of the wilding pine eradication effort in the upper Waimakariri basin is to be applauded and ECan and WELRA and all concerned (including the many volunteers who over the years have contributed substantially) congratulated on the huge progress with this weed species, the encroachment of a wide range of other weed species into the area is very worrying. When discussing the challenges to biodiversity in any area of high value the incursion of weed species is talked about front and centre. We must increase our effort in this area substantially for the step change in biodiversity effectiveness you seek to have any chance of success.

Another pet pest- passion for me at the moment given the deaths of kea by cat (in the Hawdon valley) is feral cats. A combined community meeting is being held led by WERT this year to consider what to do about feral cats in the Waimakariri catchment and assistance from ECan will be sought. I hope we can expect support with this.

Finally a word about the next generation - developing young citizens with the knowledge and awareness to protect our biodiversity and environment into the future. I am concerned that schools are not getting enough educational input from ECan. There is unmet need and while NGOs and community groups try to follow through with requests from schools this is another area where the reliance on volunteers is both unfair and probably less than optimal in terms of what is being delivered. You have excellent youth engagement staff but I ask you to look at your capacity in this area and think about extending it.

Hazards, Risks and Resilience

I am deeply concerned at what has appeared to be a stumbling somewhat resistant approach from ECan in the realm of climate change. All the biodiversity work we all do will be of little value if we cannot mitigate against climate impacts to our very best endeavours. ECan can not afford to be lagging in this. There is provision in the Local Government Act for local bodies to be pro-active looking after the well-being of our communities; and anyway mitigation and adaptation are a continuum. Stop blocking community calls for you to act.

Having said this I do note the statement about “a climate change integration programme...” That is hopefully a sign of better to come. However, the explanation leaves me less hopeful reading as it does like spin on nothing much.

I am also very concerned personally about the South Shore spit (South New Brighton) area in regard to sea level rise and the way the conversation around this has been playing out. I live near this area and urge ECan to do as you say you will on pg 10 “providing [science based] advice within and outside the organisation”.

Air Quality

I support the loans scheme for home heating/insulation.

Transport and Urban Development.

I do not support the moves from ECan to axe bus routes, reduce the Total Mobility subsidy from \$35 to \$30 nor do I support any increase in fares. I note that 5 German cities are trialling free public transport. While I do not urge this I do say that we are going in exactly the opposite direction to what we should be. This portfolio links directly to the Hazard, Risks and Resilience one as public transport is one of our weapons against climate change.

I urge more robust analysis and wider public input before going down this regressive pathway.