
From: Lionel Hume <lhume@fedfarm.org.nz>
Sent: Monday, 26 March 2018 4:57 PM
To: Mailroom Mailbox
Subject: LTP SUBMISSION
Attachments: ECan LTP 2018-2028 2.pdf

Dear Sir /Madam

Attached is Federated Farmers' submission on the Environment Canterbury LTP 2018 – 2028.

Yours sincerely

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Federated Farmers of New Zealand

Submission to Environment Canterbury on: The Long Term Plan 2018 - 2028

26 March 2018



SUBMISSION ON ENVIRONMENT CANTERBURY LONG TERM PLAN 2018 - 2028

To: *Environment Canterbury*

Name of submitter: Combined Canterbury Provinces, Federated Farmers of New Zealand

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Introduction

- 1 Federated Farmers thanks Environment Canterbury for the opportunity to submit on the Long Term Plan 2018 – 2028.
- 2 Federated Farmers of New Zealand is a voluntary, primary sector organisation that represents farming and other rural businesses. Federated Farmers has a long and proud history of representing the needs and interests of New Zealand farmers and their communities.
- 3 Federated Farmers aims to add value to its members' farming businesses by ensuring that New Zealand provides an economic and social environment within which:
 - Our members may operate their businesses in a fair and flexible commercial environment;
 - Our members' families and their staff have access to services essential to the needs of the rural community; and
 - Our members adopt responsible management and environmental practices.
- 4 The economic importance of the agricultural sector to New Zealand's economy is well recognised. Its direct and indirect contribution to New Zealand's economy is about 15%. Land-based primary sector exports comprise about 70% of New Zealand's total exports. Any council activity which affects farm businesses has the potential to also impact, positively or negatively, on district, regional and national economies.
- 5 Rates and other local government charges and costs make up a significant portion of farm business expenses. As a result, Federated Farmers is very concerned with the transparency of rate setting and the overall cost of local government to agriculture.
- 6 Federated Farmers supports councils that are making progress towards achieving fairness and equity in their rating policies. *We support Environment Canterbury's objectives that rates are collected from properties that are the direct beneficiaries of services where these can be identified and to spread the incidence of rates as fairly as possible to be consistent in charging rates.* Federated Farmers appreciates the extensive use of targeted rates by the Council for a range of activities which benefit some particular groups more than others.
- 7 This submission was developed in consultation with the members and policy staff of Federated Farmers. It is important that this submission is not viewed as a single submission, but as a collective one, that represents the opinions and views of our members.
- 8 Federated Farmers acknowledges any submissions from individual provinces or individual members of Federated Farmers.
- 9 Federated Farmers wishes to be heard in support of its submission.

Key Submissions

Revenue and Expenditure

- 10 Federated Farmers appreciates the small decrease in operating expenditure (0.85%) for 2018/19 compared with 2017/18, and the relatively modest increases projected for the following 9 years (1.6% – 2.5%). We ask that Council constrains its expenditure increases to no greater than the rate of inflation for the 10 years of this LTP.
- 11 Total rates are projected to increase by 4.5% per year for the first 3 years of the LTP, before declining to about 2.5% from year 5. The greater increases initially are to restore reserves to levels consistent with council policy. Again we ask that council constrains its expenditure increases to no greater than the rate of inflation for the 10 years of this LTP, thereby reducing the need for rate increases, because any form of rate or user charge will impact on rate payers and ultimately the regional and national economies.

Freshwater Management

- 12 That council continues to proactively implement the Canterbury Water Management Strategy, including its collaborative approach and its parallel development philosophy whereby infrastructure development will occur alongside environmental protection and restoration.
- 13 That the rates to fund this group of activities are targeted to reflect the wider community interest (both urban and rural) in water management and the fact that many of the outcomes sought are for the benefit of communities as a whole (both local and region-wide).
- 14 That council provides leadership, at a regional level, on the development of regional-scale water infrastructure which will be needed to assist with the delivery of a range of CWMS targets, especially in the Irrigated Land Area and Regional and National Economies target areas.
- 15 That Council fully recognises the positive social, economic, cultural and environmental benefits of rural water infrastructure development.
- 16 It is important to continue with scientific investigations and modelling to better understand our water resources. It is vital that we have accurate quantitative information about our water resources and understand the processes associated with them.
- 17 That Council continues to resource investigations into the use of Managed Aquifer Recharge (MAR) and Targeted Stream Augmentation. These techniques will potentially have substantial impacts on both ground and surface water quality. Specifically, we ask funding is continued for the MAR trial currently underway in Mid Canterbury.
- 18 That Council effectively resources monitoring of compliance with the NPS for freshwater Management. This should be done in a way which provides a true indication of overall water quality, rather than focusing on hot-spots and creating the perception that this represents the overall state of freshwater environments. Environmental monitoring and reporting should focus on urban waterways as much as rural waterways, with the expectation that similar

standards will apply with respect to the requirements of the NPS for Freshwater Management.

- 19 That Council continues to use science stakeholder or advisory groups along with the appointment of external peer reviewers to have input into the science which under-pins limit setting processes (currently used in the Waimakariri and Hurunui Waiau Zones). It is vital that Zone Committees and the general public have access to the range of scientific expertise which can be brought to bear on water issues.
- 20 That groups directly affected by proposed changes in limits (such as individuals and irrigation schemes with consents to take water from water bodies potentially undergoing radical changes in flow and allocation regimes) will be communicated with and consulted directly by zone committees and ECan during sub-regional plan processes.
- 21 That Council approaches the use of consent reviews, such as in the Ashburton River/Hakatere Catchment, with great caution. They have the potential to be very difficult and should only be contemplated after thorough engagement with consent-holders and other relevant stakeholders.
- 22 That expert advice from the primary sector is used when zone committees are discussing/making decisions about farming matters.

Biodiversity and Biosecurity

- 23 That Environment Canterbury considers funding biodiversity activities which primarily benefit the wider community from a UAGC.
- 24 That Environment Canterbury continues and expands its focus on working with willing landowners in order to achieve its biodiversity objectives. The partnership approach with willing landowners is likely to be far more successful than any approach reliant on regulation.
- 25 That Environment Canterbury is proactive in the containment/eradication of velvetleaf, even though it is not currently listed in the Canterbury Regional Pest Management Plan. It is potentially a very troublesome environmental pest as well as a production pest.
- 26 That Environment Canterbury adopts the funding provisions for pest management in the Canterbury Regional Pest Management plan decision, specifically:
 - That inspection, monitoring, advocacy and investigation will be funded 50% by targeted rates and 50% by the general rate for all pests.
 - That control will be funded depending on whether the pest is a production pest (100% targeted rate or user charges), a biodiversity pest (100% general rate), or both a biodiversity and a production pest (50% targeted rate and 50% general rate).
- 27 That Environment Canterbury investigates the expansion of the current Banks Peninsula Community Initiative Programme to include a wider range of properties and to cover more pests, to help protect and enhance biodiversity and align with the vision for a pest-free Banks Peninsula. More information is needed about its feasibility (particularly about the resourcing required and capacity to deliver) before committing ratepayer funds to it.

- 28 That Environment Canterbury continues to support the work of the Braided Rivers Action Group as it seeks to ascertain basic information about our braided rivers, including what entities have responsibility for the management and care of braided rivers, and the tracking of public funds generated by land in the beds and margins, with the potential to direct these funds into resourcing the Braided Rivers Programme.
- 29 That Environment Canterbury considers what success would look like with regard to the Braided Rivers Programme. Braided river issues are very complex and the simple ending of farming activity on the beds and margins will probably not result in gains for the river environment and biodiversity without massive investment in weed and pest control, along with planting and maintenance of desired species. The most cost-effective mechanism for weed and pest control along the margins may often be to enable profitable farming with appropriate conditions.

Hazards, Risk and Resilience

- 30 That the need to build resilience to climate change is recognised and that appropriate investment is made to plan for appropriate community scale water infrastructure.

Transport and Urban Development

- 31 That this area of activity continues to be funded largely from targeted rates, grants and user pays.
- 32 That Council advocates strongly to central government for an increase in the financial assistance rate for roading to 90%.
- 33 That Council, through its leadership of the Regional Transport Committee, strives to ensure that important transport infrastructure projects proceed in the face of different emphases on roading and transport by the new government.

Air Quality

- 34 That Council uses a rational, evidence-based approach to rural burning, focused on achieving desired outcomes, rather than relying on regulation (at increased cost) designed to address public perception.
- 35 That Council continues work to incentivise the use of new and more efficient heating technologies (including wood burners) but also works to ensure that this is not at the expense of individuals' health and wellbeing over winter.

Regional Leadership

- 36 That Environment Canterbury continues to focus on working in partnership with, or with the support of, other organisations and individuals. It is particularly important that Council works with farmers and landowners who must ultimately implement many of the environmental objectives of Council and the wider community.
- 37 That Council builds understanding and trust among communities and stakeholders engaging with them as early as possible in ways that are truly collaborative. To this end Federated

Farmers supports the approach initiated in the Waimakariri and Hurunui Waiau Zones, to set up science stakeholder groups, to improve trust in the underpinning science, prior to the development of sub-regional plans.

- 38 That Council continue its work to provide high quality data, with appropriate context, to underpin policy development and decision making, and to inform the public.
- 39 That Council works to improve our understanding of relevant bio-physical processes so that the right connections can be made (e.g. between cause and effect), and so that data can be interpreted and used correctly.

Detailed Submissions

Expenditure and Revenue (Consultation Document, p 16-22; Financial Information and Supporting Strategies/Policies, p 111-115)

- 40 Federated Farmers appreciates the small decrease in operating expenditure (0.85%) for 2018/19 compared with 2017/18, and the relatively modest increases projected for the following 9 years (1.6% – 2.5%). A cumulative increase in expenditure of 21% (an average of 2.1% per year) is budgeted for the 10-year period of the LTP. This is close to the rate of inflation (the CPI has averaged 2.3% over 1989 - 2017). We ask that Council constrains its expenditure increases to no greater than the rate of inflation for the 10 years of this LTP.
- 41 Total rates are projected to increase by 4.5% per year for the first 3 years of the LTP, before declining to about 2.5% from year 5. The greater increases initially are to restore reserves to levels consistent with Council policy. Again we ask that Council constrains its expenditure increases to no greater than the rate of inflation for the 10 years of this LTP, thereby reducing the need for further rate increases, because any form of rate or user charge will impact on rate payers and ultimately the regional and national economies.
- 42 The user pays component of revenue is projected to increase by 4% in 2018/19 compared with 2017/18 and by 37% over the 10 years of the LTP (both above the rate of inflation). A large proportion of these increases is from the Transport and Urban Development portfolio, which is largely public transport. The increases are justified as part of efforts to maintain public transport services on a sustainable basis (including fare increases).

Recommendation:

- 43 Federated Farmers appreciates the small decrease in total operating expenditure budgeted for the 2018/19 year compared with 2017/18 (-0.85%) and the relatively modest increases projected for the following 9 years of the LTP. We ask that council constrains expenditure below the rate of inflation, because any form of rate or user charge (to fund that expenditure) will impact on rate payers and ultimately the regional and national economies.

Freshwater Management (Consultation Document, p 6-7; Our Work Portfolios, p 13-22)

- 44 Expenditure for this group of activities is budgeted to increase by 10.8% in 2018/19 (to \$31,220,000) compared with 2017/18. Projected increases in spending average 2.9% per year until 2028, above the likely rate of inflation (average of 2.3% since 1989).

- 45 It is proposed to fund this group of activities almost entirely from general rates, starting in 2018/19, whereas previously they had been funded largely from targeted rates. It is stated that this will not affect what people/businesses pay. However, the general rate mechanism is appropriate given the wider community interest (both urban and rural) in water management and the fact that many of the outcomes are sought for the benefit of communities as a whole (both local and region-wide).
- 46 The work within the Freshwater Management portfolio is crucial and Federated Farmers supports adequate funding for it. Of particular importance are the collaborative processes and the resourcing of rigorous preparatory science to inform and under-pin limit-setting processes.
- 47 High priority should be given to scientific work to fill the gaps identified during current and past limit setting processes. This is crucial to assist with accurately defining environmental issues and to enable us to devise effective actions to address those issues.
- 48 In this context, it is vital to continue resourcing investigations into the use of Managed Aquifer Recharge (MAR) and Targeted Stream Augmentation. These techniques will potentially have substantial impacts on both ground and surface water quality. Specifically, we ask funding is continued for the MAR trial currently underway in Mid Canterbury.
- 49 One example, relevant across all zones/catchments is the need to better understand processes which affect the attenuation of dissolved nutrients. This is vital to enable more accurate estimation of nutrient loads and more effective targeting of actions to maintain/improve water quality.

Programme 1 - CWMS Facilitation

- 50 Federated Farmers supports Environment Canterbury's leadership role in implementing the CWMS. The CWMS has been developed as a collaborative way forward for water management, in which water use and infrastructure development will occur alongside environmental protection and restoration.
- 51 We particularly support the recent practice of setting up science stakeholder groups (e.g. the Waimakariri Science Stakeholder Advisory Group and the Hurunui Science Stakeholder Group) and the appointment of external peer reviewers to have input into the science processes which under-pin limit setting processes. It is vital that Zone Committees and the general public have access to the range of scientific expertise which can be brought to bear on water issues.

Programme 2 – Environmental Monitoring and Progress Reporting

- 52 Accurate data is vital to underpin planning processes and environmental programmes, and to guide public perception. Care must be taken to ensure that data presents an accurate indication of the true situation or to qualify it accordingly. For example, water quality data tends to focus on problem areas (e.g. annual sampling is done in springtime when N concentrations tend to be at their greatest).
- 53 Federated Farmers supports the application of funding to monitor compliance with the NPS for freshwater Management, specifically periphyton monitoring. As above, this needs to be

done in a way which provides a true indication of overall water quality, rather than focusing on hot-spots and creating the perception that this represents the overall state of freshwater environments.

- 54 Environmental monitoring and reporting should focus on urban waterways as much as rural waterways and the expectation should be that similar standards apply with respect to the requirements of the NPS for Freshwater Management.

Programme 3 – Zone and Regional Delivery

- 55 A large part of CWMS implementation involves agriculture. When zone committees are discussing farming matters, it is vital for the primary sector to be involved, both on the committees and as expert advisors to those committees. ECan needs to ensure that it works with all parts of the primary sector.
- 56 It is apparent during the sub-regional limit-setting processes initiated so far, that directly affected individuals and groups have not always been adequately communicated/consulted with directly, by zone committees or ECan (although this appears to be improving). Community meetings are not sufficient to consult with those who will be very directly affected by the process, such as individuals and irrigation schemes with consents to take water from water bodies potentially undergoing radical changes in flow and allocation regimes, and those who may be substantially affected by nutrient discharge limits. Such individuals and groups must be identified and communicated/consulted with directly by ECan and the relevant Zone Committee at an early stage.
- 57 In this context, Federated Farmers particularly supports the recent practice of setting up science stakeholder groups (e.g. the Waimakariri Science Stakeholder Advisory Group and the Hurunui Science Stakeholder Group) and the appointment of external peer reviewers to have input into the science processes which under-pin limit setting processes. It is vital that Zone Committees and the general public have access to the range of scientific expertise which can be brought to bear on water issues.
- 58 Federated Farmers supports the appointment of land management advisors to support farmers/land owners during plan implementation. It is vital that farmers are assisted to identify plan provisions which affect them and to cost/effectively implement those provisions.
- 59 The establishment of Cultural Land Management Advisors is potentially useful insofar as they assist farmers to fulfil their obligations under the LWRP or relevant sub-regional plan.

Resource Management Act Water Framework

- 60 Federated Farmers acknowledges the need to meet National Planning Standards, and to implement National Policy Statements and National Environmental Standards. However, we encourage Council to continue to seek cost-effective options, which may include alternatives to comprehensive plan change processes, such as targeted plan changes.
- 61 It is stated that the use of consent reviews (as an alternative or to complement plan change proposals) has been considered by Council. It is further stated that “the Ashburton River/Hakatere catchment is the most suitable candidate for consent reviews in the short term” and that this will be investigated as part of LTP implementation.

- 62 Federated Farmers urges caution around the use of consent reviews. They have the potential to be very difficult and should only be contemplated after thorough engagement with consent-holders and other relevant stakeholders.

Regional Water Infrastructure Support

- 63 Federated Farmers strongly supports this programme of work. The integrated development of regional-scale water infrastructure is a key part of CWMS implementation. It is vital to several CWMS target areas, particularly Irrigated Land Area and Regional and National Economies. It will also greatly assist with some of the environmental targets, for example, by helping to relieve pressure on certain foothills rivers and groundwater resources.
- 64 The reliability of water supply provided by storage and associated infrastructure will also assist with achieving the Water-use Efficiency targets of the CWMS.
- 65 Federated Farmers strongly believes that the development of regional-scale water infrastructure and storage options will provide the water needed for a growing rural economy in a way that is sustainable and does not damage the environment in an overall sense. We ask that Council pro-actively facilitate the development of water augmentation and storage options, consistent with the CWMS target areas on Irrigated Land Area and Regional and National Economies.
- 66 Wise use of water should result in multiple social, economic and environmental outcomes. The development of water storage has huge potential to deliver a wide range of positive outcomes. In addition to the economic benefits that accompany projects such as irrigation, community water supplies and electricity generation, water storage has the potential to provide for increased bio-diversity and improved recreational opportunities^{1&2}.

Recommendations:

- 67 That council continues to proactively implement the Canterbury Water Management Strategy, including its collaborative approach and its parallel development philosophy whereby infrastructure development will occur alongside environmental protection and restoration.
- 68 That the rates to fund this group of activities are directed to reflect the wider community interest (both urban and rural) in water management and the fact that many of the outcomes sought are for the benefit of communities as a whole (both local and region-wide).
- 69 That council provides leadership, at a regional level, on the development of regional-scale water infrastructure which will be needed to assist with the delivery of a range of CWMS targets, especially in the Irrigated Land Area and Regional and National Economies target areas.

¹ Harris, S., Butcher, G. and Smith, W. (2006) The Opuha Dam: an *ex post* study of its impacts on the provincial economy and community. Aoraki Development Trust.

² Ministry of Agriculture and Forestry (2004) The Economic Value of Irrigation in New Zealand. *MAF Technical Paper No: 04/01*

- 70 That Council fully recognises the positive social, economic, cultural and environmental benefits of rural water infrastructure development.
- 71 It is important to continue with scientific investigations and modelling to better understand our water resources. It is vital that we have accurate quantitative information about our water resources and understand the processes associated with them.
- 72 That Council continues to resource investigations into the use of Managed Aquifer Recharge (MAR) and Targeted Stream Augmentation. These techniques will potentially have substantial impacts on both ground and surface water quality. Specifically, we ask funding is continued for the MAR trial currently underway in Mid Canterbury.
- 73 That Council effectively resources monitoring of compliance with the NPS for Freshwater Management. This should be done in a way which provides a true indication of overall water quality, rather than focusing on hot-spots and creating the perception that this represents the overall state of freshwater environments. Environmental monitoring and reporting should focus on urban waterways as much as rural waterways, with the expectation that similar standards will apply with respect to requirements of the NPS for Freshwater Management.
- 74 That Council continues to use science stakeholder or advisory groups along with the appointment of external peer reviewers to have input into the science which under-pins limit setting processes (currently used in the Waimakariri and Hurunui Waiau Zones). It is vital that Zone Committees and the general public have access to the range of scientific expertise which can be brought to bear on water issues.
- 75 That groups directly affected by proposed changes in limits (such as individuals and irrigation schemes with consents to take water from water bodies potentially undergoing radical changes in flow and allocation regimes) will be communicated with and consulted directly by zone committees and ECan during sub-regional plan processes.
- 76 That Council approaches the use of consent reviews, such as in the Ashburton River/Hakatere Catchment, with great caution. They have the potential to be very difficult and should only be contemplated after thorough engagement with consent-holders and other relevant stakeholders.
- 77 That expert advice from the primary sector is used when zone committees are discussing/making decisions about farming matters.

Biodiversity and Biosecurity (Consultation Document, p 8-9; Our Work Portfolios, p 23-28)

- 78 Federated Farmers appreciates the inclusion of biosecurity (largely weed and pest control) along with biodiversity. At the time of the previous LTP, biosecurity was associated with a collection of largely unrelated activity areas. There are strong connections between biodiversity and biosecurity activities, and it makes very good sense to have them in the same work portfolio.
- 79 Expenditure on this group of activities is projected to increase by 12.7% in 2018/19 compared with 2017/18. This is a result of 8.3% and 2.5% increases in expenditure on biodiversity and Biosecurity respectively. From year 4, annual increases in expenditure are about 2.5% per annum. The initial large increases in funding for this portfolio due to initial

efforts to create a “step-change in effort” to halt the decline and restore indigenous habitats and ecosystems (primarily for the Braided Rivers and Wetlands programmes). There is a substantial increase in biosecurity funding in 2020/21 for wilding conifer maintenance. Because much of the work in this portfolio is for the benefit of the wider community (particularly the biodiversity work) it is appropriate for it to be funded from general rates. Further, because the biodiversity work tends to benefit all individuals rather than specific properties, there would be justification for it to come from the UAGC component of general rates. (There is ample scope for these activities to be funded from a UAGC because the UAGC is currently substantially below the ceiling of 30% of the total rate take.)

- 80 It is stated that “indigenous biodiversity is one of the two strategic priorities identified by Council and confirmed by stakeholders and the community” and that there will be a “step-change” in effort to halt the decline and restore indigenous habitats and ecosystems.
- 81 Federated Farmers agrees that two major threats to biodiversity are introduced plant and animal pests. Indigenous biodiversity and farming have a strong shared interest in addressing these threats.
- 82 Federated Farmers strongly supports the emphasis placed on working with land owners. It is correctly stated that “landowner commitment and action is an essential component of successful biodiversity programmes”. In order to achieve its objectives with regard to biodiversity, Council has correctly identified that it needs to work with willing landowners and build on work that is already being done. The partnership approach with willing landowners is likely to be far more successful than any approach reliant on heavy-handed regulation.
- 83 It is stated that a more proactive approach is being adopted, with greater emphasis on pathway management to address the risks of new pests establishing and spreading in the region. One such new pest is velvetleaf (*Abutilon theophrasti*). This plant, which is a recent arrival in Canterbury, has a number of features which enable it to establish and be a problem in both farmed and natural environments, as follows³. It reproduces via seed, with each plant producing up to 17,000 seeds per year. The seeds have a hard coat and can remain viable for decades in soil. Possible means of dispersal include human activity (including via machinery and vehicles), via movement of animals and birds, and via water (the hard seed coat enables survival in water for over 6 years). It is thought that velvetleaf should be considered as a potential environment weed in New Zealand, with the exception of arid or wetland environments³.
- 84 Therefore, Environment Canterbury should play a proactive part in the containment/eradication of velvetleaf, even though it is not currently listed in the Canterbury Regional Pest Management Plan.
- 85 Federated Farmers has appreciated the work of Environment Canterbury in monitoring and controlling a wide range of animal and plant pests, in collaboration with Pest Management Liaison Committees, territorial local authorities and the wider rural community. Many of the pests are threats to both production and biodiversity. The work is extremely valuable and should continue under the new structure of Pest Area Committees.

³ Thomson, F; Bourdot, G; James, T and Lawrie I 2018: Weed Potential of *Abutilon theophrasti* (Velvetleaf) in New Zealand – a Critical Review of the Literature

86 Federated Farmers supports the funding provisions for pest management in the Canterbury Regional Pest Management plan decision, specifically:

- That inspection, monitoring, advocacy and investigation will be funded 50% by targeted rates and 50% by the general rate for all pests.
- That control will be funded depending on whether the pest is a production pest (100% targeted rate or user charges), a biodiversity pest (100% general rate), or both a biodiversity and a production pest (50% targeted rate and 50% general rate).

Biosecurity

87 It is stated that it is proposed to expand the current Banks Peninsula Community Initiative Programme to include a wider range of properties and to cover more pests, to help protect and enhance biodiversity and align with the vision for a pest-free Banks Peninsula. While this sounds like a good idea, more information is needed about its feasibility (particularly about the resourcing required and capacity to deliver) before committing ratepayer funds to it. In the first instance, it would be best to commit to thoroughly investigating the idea. Depending on the outcome of the investigation, further funding could be provided, at a later stage, via the annual plan process.

Braided Rivers

88 The stated focus of the new Braided Rivers Programme is to maintain and enhance the natural character of braided rivers consistent with the Canterbury Water Management Strategy.

89 There, is an initial need for basic information about braided rivers such as what entities own and have interests in the beds and margins of braided rivers, and what responsibility those entities have for the management and care of braided rivers and their margins. This work is currently underway as part of the work of the Braided Rivers Action Group. As part of this work, it would be useful to be able to track public funds generated by land in the beds and margins e.g. land leased by public entities such as LINZ, and direct these funds into resourcing the Braided Rivers Programme.

90 Careful thought must be put into desired outcomes from the Braided Rivers Programme, particularly regarding what success would look like. Braided river issues are very complex. For example, the simple ending of farming activity on the beds and margins will probably not result in gains for the river environment and biodiversity without massive investment in weed and pest control, along with planting and maintenance of desired species. The most cost-effective mechanism for weed and pest control along the margins may often be to enable profitable farming with appropriate conditions.

Wetlands

91 Federated Farmers supports the intention to use voluntary engagement processes rather than regulatory measures. We believe that this approach is far more likely to produce successful outcomes than reliance on regulation.

Recommendations:

- 92 That Environment Canterbury considers funding biodiversity activities which primarily benefit the wider community from a UAGC.
- 93 That Environment Canterbury continues and expands its focus on working with willing landowners in order to achieve its biodiversity objectives. The partnership approach with willing landowners is likely to be far more successful than any approach reliant on regulation.
- 94 That Environment Canterbury is proactive in the containment/eradication of velvetleaf, even though it is not currently listed in the Canterbury Regional Pest Management Plan. It is potentially a very troublesome environmental pest as well as a production pest.
- 95 That Environment Canterbury adopts the funding provisions for pest management in the Canterbury Regional Pest Management plan decision, specifically:
- That inspection, monitoring, advocacy and investigation will be funded 50% by targeted rates and 50% by the general rate for all pests.
 - That control will be funded depending on whether the pest is a production pest (100% targeted rate or user charges), a biodiversity pest (100% general rate), or both a biodiversity and a production pest (50% targeted rate and 50% general rate).
- 96 That Environment Canterbury investigates the expansion of the current Banks Peninsula Community Initiative Programme to include a wider range of properties and to cover more pests, to help protect and enhance biodiversity and align with the vision for a pest-free Banks Peninsula. More information is needed about its feasibility (particularly about the resourcing required and capacity to deliver) before committing ratepayer funds to it.
- 97 That Environment Canterbury continues to support the work of the Braided Rivers Action Group as it seeks to ascertain basic information about our braided rivers, including what entities have responsibility for the management and care of braided rivers, and the tracking of public funds generated by land in the beds and margins, with the potential to direct these funds into resourcing the Braided Rivers Programme.
- 98 That Environment Canterbury considers what success would look like with regard to the Braided Rivers Programme. Braided river issues are very complex and the simple ending of farming activity on the beds and margins will probably not result in gains for the river environment and biodiversity without massive investment in weed and pest control, along with planting and maintenance of desired species. The most cost-effective mechanism for weed and pest control along the margins may often be to enable profitable farming with appropriate conditions.

Hazards, Risk and Resilience (Consultation Document, p10-11; Our Work Portfolios, p 29-38)

- 99 Expenditure for this group of activities is budgeted to decrease by 5.6% in 2018/19 (to \$25,195,000) compared with 2017/18 (due to the completion of an earthquake compliance project). Projected spending is then projected to increase relatively modestly until 2028, with an overall net increase of 18.4% over the 10-year period of this LTP.

Natural hazards

- 100 Federated Farmers appreciates the need to gather data on potential natural hazards in order to enable risk assessment and management. This work needs to be directly linked with preparation for managing these events (such as floods and earthquakes) when they occur.

Navigation and recreational boating safety

- 101 The efficient operation of shipping in the ports of Lyttelton and Timaru is vital to the Canterbury economy. Federated Farmers supports measures taken by Environment Canterbury to ensure that the various users of Canterbury's waterways co-exist safely and ensure that commercial shipping can operate efficiently and safely.
- 102 Federated Farmers appreciates the use of user charges for larger commercial users of our harbours and the use of a UAGC to fund recreational boat safety activities.

Flood protection

- 103 Increasingly the wider community is seeking influence over local decision making, including over flow regimes, and flood protection and control works. Therefore, Federated Farmers requests that the works and services rate and general rate contributions be increased over time to reflect the greater influence of the wider (including regional) community.
- 104 Federated Farmers supports flood protection and erosion control measures, and the provision of flood hazard information including the provision of detailed information on its website. We encourage Environment Canterbury to continue to work constructively with local river rating groups.

Coastal Environment and Hazards

- 105 The management of coastal hazards is vital, not only to safeguard human life, but also to ensure the ongoing economic benefit from Canterbury's two commercial ports, Lyttelton and Timaru

Emergency management

- 106 Federated Farmers recognises the importance of effective emergency management and supports work to increase the awareness and preparedness of communities.

Hazardous waste

- 107 Federated Farmers appreciates Environment Canterbury's role in coordinating hazardous waste management and emphasizes the need for on-going mechanisms to collect hazardous waste that are easy to access and cost-effective to use. We support the inclusion of farm waste disposal practices within farm environment plans. This is likely to be much more effective than prescriptive regulation.

Climate Change Integration

- 108 It is intended to develop a process to ensure that climate change is factored in to relevant Council decisions across portfolios.
- 109 This is particularly important when considering programmes within the Freshwater Management portfolio, especially Programme 5, Regional Water Infrastructure Support. Water storage, and the development of community-scale water infrastructure generally, is crucial with a climate change scenario which predicts less rain on the east coast (Canterbury Plains), more rain on the west coast and in the main divide and greater flows (albeit more variable) in Canterbury's alpine rivers⁴⁵⁶⁷. Canterbury is very well placed to build resilience to the impacts of climate change, to both protect our regional economy and ensure reliable urban water supplies. However, this will require far-sighted planning and investment.

Recommendation:

- 110 That the need to build resilience to climate change is recognised and that appropriate investment is made to plan for appropriate community scale water infrastructure.

Transport and Urban Development (Consultation Document, p 13-15; Our Work Portfolios, p 39-47)

- 111 Federated Farmers acknowledges the benefits of effective public transport, and appreciates that these activities are funded largely from targeted rates, grants and user pays, because the beneficiaries are largely urban rate payers or those close to the bus routes between urban centres. A decrease in expenditure of 3.5% is budgeted for 2018/19 compared with 2017/18, with steady increase projected for the remainder of the 10-year period, resulting in a net increase in expenditure of 20%. Expenditure on this group of activities (\$70,159,000 in 2018/19) is a very large amount of money to take out of the regional economy and care is required to achieve efficiency and avoid unintended or unfair rating outcomes.

Regional Transport

- 112 The efficient operation of shipping in the ports of Lyttelton and Timaru is vital to the Canterbury economy. Therefore, Federated Farmers supports the Lyttelton Port rebuild and recovery, consistent with the Lyttelton Port Recovery Plan.
- 113 Federated Farmers generally supports the vision and values set out in the Land Transport Strategy and the Travel Demand Strategy. However, we are concerned about the degree to which the strategies are focused on the one major urban centre of the region. We believe that maintaining the strategic road network is critical to the region's welfare but maintain that the same is true of the non-strategic road network, which provides essential links between

⁴ Ministry for the Environment 2016: Climate Change Projections for the Canterbury Region. [Climate change projections for the Canterbury region | Ministry for the Environment](#)

⁵ Ministry of Agriculture and Forestry 2010: Introduction to Climate Change:12; Effects and Impacts: Canterbury. MAF Website.

⁶ Woods, R. 2008: Projected Climate and River Flow for the Rangitata Catchment for 2040. NIWA Client Report CHC2008-097

⁷ Zammit, C. and Woods, R. 2011: Projected Climate and River Flow for the Waimakariri Catchment for 2040s and 2090s. NIWA Client Report No: CHC2011-025

the region's productive industries and transport hubs. Federated Farmers submits that increased use of local roads justifies an increase in the financial assistance rate to a flat 90%. This would help to address the inequity associated with funding roads from rates based on property value (1997 report to the Roothing Advisory Group and 2005 Surface Transport Costs and Charges Study). Also, efforts to achieve the vision and targets should be tempered by the community's ability/willingness to pay. Targets must take into account foreseeable income without increasing the financial burdens on communities.

- 114 We note that the new government is placing a different emphasis on roading and transport expenditure and that this is likely to result in changes to funding of previously planned projects. We urge Council, through its leadership of the Regional Transport Committee, to ensure that important transport infrastructure projects proceed.

Recommendations:

- 115 That this area of activity continues to be funded largely from targeted rates, grants and user pays.
- 116 That Council advocates strongly to central government for an increase in the financial assistance rate for roading to 90%.
- 117 That Council, through its leadership of the Regional Transport Committee, strives to ensure that important transport infrastructure projects proceed in the face of different emphases on roading and transport by the new government.

Air Quality (Consultation Document, p 12; Our Work Portfolios, p 49-53)

- 118 Expenditure on this portfolio is budgeted to decrease by 3.7% in 2018/19 compared with 2017/18, then to level off, with an overall decrease of 3.0% by 2027/28.
- 119 Federated Farmers supports measures to improve air quality in Christchurch and other Canterbury cities and towns and it is gratifying that air quality in the region is improving.

Environmental Monitoring and Progress Reporting

- 120 Federated Farmers supports the programme of monitoring and progress reporting, to ensure that the measures being adopted are effective in improving air quality (and in moving towards achieving the National Environmental Standards for Air Quality).

Cleaner Home Heating

- 121 Federated Farmers supports work to incentivise the development of new and cleaner heating technologies. As much flexibility as possible needs to be provided so that people can choose/use the most cost-effective heating options in both urban and rural situations. We support the continuation of wood burning as a home heating option. We also support the statement that the number one priority is that people are warm and dry. Clean air should not come at the expense of those who cannot afford to keep themselves warm and dry.

Non-Domestic Emissions

- 122 Federated Farmers is opposed to some of the requirements for stricter management of rural fires and stubble burning.
- 123 Federated Farmers supports the underlying philosophy of the Proposed Air Regional plan, that crop residue burning should be a permitted activity. However, we strongly oppose the imposition of buffer areas within which consents are required. There are valid agronomic reasons for crop residue burning and the effects from burning need to be considered alongside the potential consequences of not burning, such as greater diesel consumption/exhaust, greater agrichemical use and the build-up of diseases such as the cereal disease take-all which cannot be managed using agrichemicals. The issues around crop residue burning compared with alternative practices are thoroughly summarised in the FAR report prepared by Williams et al. 2013⁸.
- 124 Federated Farmers considers that it would be more effective to work collaboratively with farmers to minimise adverse effects than to rely on regulation. The new process (with controlled activity consents) is likely to result in the same number of fires, lit by the same people as previously. The environmental result is very likely to be the same, but with the addition of another layer of bureaucracy and additional cost.
- 125 While crop residue fires may look spectacular, and may have a very localised effect on PM₁₀ for a short period, they have little effect on PM₁₀ averaged over a 24 hour period. The issue for urban dwellers is largely one of perception. Federated Farmers believes that the best way forward is to work with farmers to improve practice where this is necessary, impose and enforce appropriate permitted activity conditions, and educate the wider public about the issues surrounding crop residue burning, including comparison of the pro's and con's of burning compared with alternative practices.

Recommendations:

- 126 That Council uses rational, evidence-based approach to rural burning, focused on achieving desired outcomes, rather than relying on regulation (at increased cost) designed to address public perception.
- 127 That Council continues work to incentivise the use of new and more efficient heating technologies (including wood burners) but also works to ensure that this is not at the expense of individuals' health and wellbeing over winter.

Regional Leadership (Consultation Document, p 15; Our Work Portfolios, p 55-63)

- 128 Expenditure in this portfolio is budgeted to increase by 1.8% in 2018/19 compared with 2017/18, and to increase by 17.5% over the 10-year period covered by this LTP. Federated Farmers supports the use of reserves to smooth rates increase over the 10-year plan period. We continue to support a large proportion of funding from the general rate, consistent with a

⁸ Williams, R.; Poole, N.; Fraser, P.; Grant, D.; Hanson, N.; Orson, J.; Rolston, P.; and Sim, J. 2013: Review of the role and practices of stubble burning in New Zealand, including alternative options and possible improvements. A report prepared for the Canterbury Regional Council by the Foundation for Arable Research.

more collaborative approach to water management and in recognition of the wider community benefits of these activities.

- 129 We appreciate and support the use of uniform annual general charges to partially fund this group of activities, namely those activities which benefit or are linked with individuals rather than property, such as community engagement and democratic processes.
- 130 Federated Farmers supports the statement that “much of the work of Environment Canterbury is only possible in partnership or with the support of other organisations and individuals”. This is especially true for landowners who must ultimately implement many of the environmental objectives of Council and the wider community.

Ngai Tahu and regional relationships

- 131 One of the keys to building understanding and trust among communities and stakeholders is to engage with them as early as possible. To this end we support the approach initiated in the Waimakariri Zone, to set up a Science Stakeholder Advisory Group and a Technical Lead Advisory Group as the science work-stream for development of a sub-regional plan begins. A similar approach has also been adopted in the Hurunui Waiau Zone with the establishment of the Hurunui Science Stakeholder Group. These will hopefully result in scientific information which is trusted by the community and stakeholders and a greater degree of agreement and the respective plan changes progress.

Plans, consenting and compliance

- 132 Federated Farmers strongly agrees that, in the development of plans, early consideration must be given as to how they can be implemented. Early consultation with stakeholders, as discussed in the paragraph above, will help immensely in this regard.

Our information and advice

- 133 Federated Farmers supports the statement that “data and information are central to good policy and decision making”. In addition, the quality of data is very important. This includes the context surrounding the data, particularly for data which is publically released. For example, if water quality data is related to a side braid of a river which is used for swimming. This context should be provided so that the data are not interpreted to reflect water quality in the river as a whole.
- 134 Understanding of processes is also hugely important so that the right connections can be made and so that data can be interpreted and used correctly. One example where there is currently a lack of understanding of key processes is the attenuation of nutrient discharge in the vadose zone. Another is the impact of irrigation on soil water holding properties (Federated Farmers is currently participating in a Sustainable Farming Fund project to help fill this gap in our knowledge).

Recommendations:

- 135 That Environment Canterbury continues to focus on working in partnership with, or with the support of, other organisations and individuals. It is particularly important that Council works

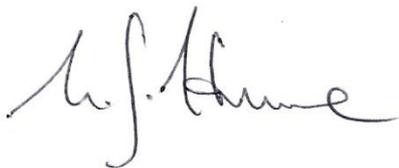
with farmers and landowners who must ultimately implement many of the environmental objectives of Council and the wider community.

- 136 That Council builds understanding and trust among communities and stakeholders engaging with them as early as possible in ways that are truly collaborative. To this end Federated Farmers supports the approach initiated in the Waimakariri and Hurunui Waiau Zones, to set up science stakeholder groups, to improve trust in the underpinning science, prior to the development of sub-regional plans.
- 137 That Council continue its work to provide high quality data, with appropriate context, to underpin policy development and decision making, and to inform the public.
- 138 That Council works to improve our understanding of relevant bio-physical processes so that the right connections can be made (e.g. between cause and effect), and so that data can be interpreted and used correctly.

Conclusion

Federated Farmers, Canterbury Region, thanks Environment Canterbury for the opportunity to submit on its Long Term Plan 2018 - 2028. We are committed to the sustainable management of the region's natural and physical resources and look forward to continuing to work constructively with Council in the future.

Federated Farmers wishes to speak in support of its submission.



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Federated Farmers of New Zealand