

From: [Giarne Clarke Harrison](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP Submission
Date: Wednesday, 28 August 2019 11:46:39 AM
Attachments:

Kia ora,

Please find attached my objection to change 7 in the LWRP submission.

Thank you, Giarne Harrison



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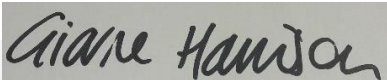
SUBMISSION to ECAN on Proposed Plan Change 7 to the LWRP Submission

Form 5: Submissions on a Publicly Notified Proposed Policy Statement or Regional Plan under Clause 5 of Schedule 1 of the Resource Management Act 1991

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I cannot fully comprehend the online form – it is confusing and frustratingly worded. If I read the essence of it correctly and ignore the terminology I come to:

I have nothing to financially gain from making a submission, I am an interested member of the public.

Signature (electronically)  Date: 28 August 2019

I do wish to be heard in support of my submission and

I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing.

Firstly, **I oppose the planned changes.** I am a member of the public living in Christchurch with no personal scientific background but an interest in ensuring our water is the best quality it can be for us and our tamariki, and our mokopuna. Arohamai for the grey under the typing. Something happened with the formatting of most parts of this submission that I can't correct.

Nitrates movement into aquifers and lack of community consultation with Christchurch residents:

I believe there are a number of research pieces that indicate issues about the impact of nitrate levels on our Christchurch city aquifers. From my basic reading it doesn't matter whether the nitrates come from the northern or southern border of the Waimakariri river, they do make their way into the aquifers. Therefore people in Christchurch should have been involved in the process earlier on.

Are there no upper limit for nitrates outside the average? Surely, just like isolated incidents of ecoli in drinking water, there is the need to capture data on outlying areas and ensure mitigation is put in place immediately where thresholds go far above an acceptable level. There seems to only be rationale about aquatic species rather than human impact and I believe the research shows both are impacted.

What is planned for the concentrations in wells that have maximum levels in the 2.9 range? The average makes the impact look minimal, yet in the area with 2.9 mg/L concentrations I imagine the impacts could be very visible and need urgent attention.

Balance of rural/non-rural concerns:

It feels like the balance between town and rural concerns and needs isn't right with ECAN – it appears to me that non-rural, and even rural people not involved in farming, have been asked to make concessions so that farming can continue in ways that we should know by now are not sustainable and have huge impacts on the non-farming communities that surround them.

Nitrate levels and its link to colon cancer:

It stunned me to read this article: <https://thespinoff.co.nz/science/28-01-2019/could-new-zealands-drinking-water-be-causing-cancer/>

Within the article:

“A recent [Fish and Game New Zealand](#) investigation of [drinking water supplies](#) in the Canterbury region found that nitrate levels in drinking water sourced from groundwater in areas of intensive farming and horticulture are already high and rising. The findings are consistent with data from the regional council [Environment Canterbury](#). The latest [groundwater report](#) showed that half of the wells they monitor have values greater than 3ppm nitrate-nitrogen, more than three times the Danish study's trigger level for colorectal cancer risk.

[Christchurch City Council data](#) show that of 420 samples collected during five years from 2011 to 2016, 40% exceeded 0.87ppm.

When nitrate enters waterways, it accelerates algae growth. Freshwater scientists have long been pushing for nitrate limits to curtail algal proliferation, but restrictions have been slow and in some regions non-existent. An important coincidence is that the [Australian and New Zealand guideline for healthy aquatic ecosystems](#) for nitrate is at [0.7mg/l nitrate-nitrogen](#), close to the level required to stay under the colorectal cancer risk value found in the Danish study.”

The UN's Precautionary Principle requires that decision makers take precautions where there is reason to expect harm could come from that decision. One would assume that part of consultation around will be ascertaining the level of risk that the people directly affected are comfortable with to realise the benefits of activities that create that risk.

There is an ever-increasing understanding of, and evidence recognising, the negative impacts caused by elevated nitrate concentrations and the costs of that in terms of the health impact on individuals, the social costs of people dying prematurely and the cost of treating those who get sick.

I would like ECAN to set rates that reflect a low-risk approach to the health and wellbeing of tangata and awa. To allow rates to rise to 3.8mg/L seems reckless.

Access to information and accessibility issues with the submission:

It is important that ECAN have multiple formats for information so that the public can participate in consultation and submission processes. I understand that documentation was online or available on CD via the Regional Council offices. What about those who are not comfortable reading on computers or don't have access to a computer to view information.

Background on me – I am a tech capable person who has access to a computer at home and at work. I am mostly comfortable reading information on screens but for some things paper is easiest. Printing costs can be a barrier personally to me. I am usually relatively comfortable reading papers and have made multiple submissions to government legislation and Council regulations, I think I've even submitted to ECAN in the past around the Canterbury Plains Water scheme.

I found your online form ridiculously difficult, wordy and nonsensical in places. I suggest you get some people involved who will give you feedback on forms before they go live. If the wording in the legislation is to blame then you could feed that upwards, and even better, have a "in laymans terms" part that allows for wide ranging access to information. I gave up on the online form and couldn't even find a quick way on your website to make an email submission. It was only a facebook discussion where I was given the information I needed to make a submission.

The wording of the LWRP is full of barriers to finding critical pieces I was interested in and I imagine befuddled others.

Can you honestly hold your heads high and say you have done all you can to make information accessible in terms of formats, language, technical terminology, legislator speak, acronyms, your online submission area, website navigation and face to face consultation attempts.

Other matters:

Section reference	Oppose/ support	Reasons / comments	I seek the following decisions from ECAN
8.5.21 P 80	Oppose	Placing no restrictions on land uses below 5 ha ignores the cumulative effects of unregulated activities	Remove rule
8.5.22 and 8.5.23 P 80	Oppose	Does not apply the precautionary principle	Apply the most restrictive values to land within part of a subarea, or across subareas
8.7.3 P 93 Table 8-5	Oppose	Oppose limits and target that seek to merely meet the minimum bottom line. We should be aiming higher to better provide for our native species, protect private and public health, and meet Ngai Tahu values	Set a minimum target value of 5 mg/L. This provides better protections for public and environmental health