From: Merav Benaia
To: Mailroom Mailbox

Subject: Plan Change 7 to the LWRP Submission

Date: Tuesday, 10 September 2019 6:38:27 PM

The Christchurch aquifers which provide pure source of water for Christchurch residents are highly valued by the people of Christchurch. Sometime in the last decade we have learned that nitrates from the Waimakariri area leach under the Waimakariri River and into those pure aquifers and that the land use currently allowed in those places is allowing those nitrates to leach.

What this current plan change does, in the guise of pretending to lower nitrate levels into the Christchurch aquifers, is to allow for decades of increases. This is inconsistent with the strategic policies in the Land and Water Regional Plan which gives priority to making sure water quality does not decline.

The implications of nitrate leaching in the Waimakariri Nitrate Priority Area, modeled to result in a nitrate level of 3.8mg/l are horrific. This will pose an unacceptable risk to Christchurch's drinking water quality and people's health. There is a comprehensive Danish study which links a 2.1mg/l increase in nitrate levels with a 15% increase in colorectal cancers. The health impacts of these massive increases in nitrates have not been considered in the report. I would have expected the water source protector to take a precautionary approach on this.

From my understanding (and you have made it very difficult to understand!) the 3.8 mg/L threshold figure is an average concentration and not actually a maximum. So conceivably some areas could have nitrate concentrations much much higher and it would still comply.

The very minor reductions required in the plan change for land users in the Waimakariri District seems almost to be voluntary in that there is no mention of any penalties for non compliance. So the cost to Christchurch people is very high but the slow reduction in the Waimakariri district does not even come with enforcement.

The benefit to private individuals and corporations is putting the drinking water of nearly 400,000 people at risk. This is entirely inappropriate and unacceptable.

There is no economic benefit that justifies such contamination of drinking water and putting at risk human health. None!

Furthermore, while the economics for the farmers have been calculated, only limited mention has been made of the cost to Christchurch water users.

I strongly support a science-based precautionary approach to both the protection of human health and the protection of Christchurch's drinking water sources.

Modelling the nitrate pollution to 50+ years away is short sighted and selfish. Do we not care for the quality of drinking water of our future generations?

And to top it all up, Ecan has cynically made this plan change under legislation which means that no one can take an appeal on merit to the Environment Court.

This is a severe limitation on Christchurch people's fundamental rights.

I consider this current plan to be an environmental vandalism in the extreme.

I could not gain an advantage in trade competition through this submission.

Thank you for considering my submission.

I wish to speak to my submission at the public hearings.

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