

**From:** [Anake Goodall](#)  
**To:** [Mailroom Mailbox](#)  
**Subject:** PC7 submission  
**Date:** Thursday, 12 September 2019 9:41:57 AM

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This submission is made on behalf of [Seed The Change | He Kakano Hapai](#).

*Man does not weave this web of life. He is merely a strand of it. Whatever he does to the web, he does to himself. - Chief Seattle*

#### **For the Waimakariri section:**

- I consider the implications of nitrate leaching in the Waimakariri ‘Nitrate priority area’, which is modelled to result in a nitrate level of 3.8 mg/l, poses an unacceptable risk to the drinking water of current and future Otautahi Christchurch citizens.
- I consider the nitrate reduction rules should require appropriate reductions in the ‘Nitrate priority area’ which will maintain or improve the current quality of the Christchurch drinking water aquifers as is required under the NPS for Freshwater.
- I consider that economic externalities must be taken into account alongside farm operating surplus assessments, such as the cost to younger and future generations if they are faced with needing to treat their drinking water or source alternative supplies.
- I strongly support a science-based precautionary approach to both the protection of human health and the protection of Christchurch’s drinking water sources, which rely on functional, healthy aquifer ecosystems.
  - Graham Fenwick (NZ’s leading groundwater ecosystem scientist) suggests in his evidence to the Te Waikoropupu springs WCO hearing a trigger value of 0.4–0.5 mg/l as a precautionary value to ensure ecosystem health.
  - Chris Hickey (NZs leading ecotoxicologist) recommends in his evidence to the Te Waikoropupu springs WCO hearing that where long lag times apply, a management limit of 0.55–1.1 mg/l is appropriate (Hickey considers a ‘long time lag’ to be 8 years, whereas in the lag effects for the Waimakariri ‘Nitrate priority area’ is modelled as being 50+ years).
  - I would like to see limits set in the life of this proposed plan that achieve those ranges of limits suggested as part of the Te Waikoropupu springs WCO hearing.

#### **For the Omnibus section:**

I support the rules applying to:

- Greater restrictions on activities to improve protection of the remaining habitat of native freshwater fish;
- Additional stock exclusion provisions for swimming sites,
- Greater recognition of values (such as mahinga kai) and protection of sites of significance to Ngai Tahu, including wahi tapu (sacred sites), wahi taonga (treasured sites), tuhituhi o nehera (limestone rock art sites) and waipuna (springs), and,
- The addition of new salmon spawning sites.
- I could not gain an advantage in trade competition through this submission.
- Thank you for considering my submission.

Let's set the next generation up for success, not failure.

Noho ora mai.

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