

From: [Tanya Didham](#)
To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP Submission
Date: Friday, 13 September 2019 9:17:52 AM
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TO WHOM IT MAY CONCERN

Please find attached my personal submission on Plan Change 7.

Regards,

Tanya Didham

Personal Submission to ECan on Plan Change 7 to the LWRP

From:
Tanya Didham
49 Yarmouth St
Aranui, CHCH 8061

13 Sept 2019

TO WHOM IT MAY CONCERN

It is encouraging to see in the mail-out material that ECan is promoting better farming practises and cleaner waterways.

However, the stated intention and the actual intention of Plan Change 7 seem to be two different things. ECan states that PC7 aims '*to improve freshwater outcomes throughout the region*' and includes '*requirements for farms to further reduce nitrogen losses over time*'. A 3.8mg/litre limit was mentioned in the Zone Implementation Programme Addenda (ZIPA) as an improved upper limit.

So it was surprising to see the draft document had no prescribed nitrate limit. And not only that, no enforcement or penalty is suggested for non-compliance. So **failure to comply has no apparent consequences, and there is no upper waterborne nitrate** limit anyway. This does not sound like a way to improve freshwater or reduce nitrogen loss to me.

For us here in Christchurch, it's all about the downstream effects. The underground downstream effects to be specific. And the **future of nitrates contaminating our drinking supply**.

NZ drinking water standards currently have an upper nitrates limit of 11.2mg/litre. The 2018 Danish study implicated nitrates at concentrations as low as 0.87mg/l in drinking water could increase the risk of colo-rectal cancer. ECan acknowledges the study but claims there are too few studies on the subject to be sure. However the Danish study was a longitudinal study with 2.7 million participants followed over a 33-year period. It is pretty robust data, which I believe warrants an **upper nitrate limit of less than 1mg/litre for our waterways**.

We know that all the excess nitrates going into the ground are going to eventually reach Christchurch's deep drinking aquifers. Maybe in 50 years, maybe in 150 - that's not clear - but they'll get there. Christchurch will then face a **massive decontamination bill*** to preserve our drinking source. Or abandon our destroyed age-old aquifers and drink the Waimakariri River with chlorine in it instead. Is that the gift we want to give future generations? Sorry kids, we had

a globally rare, artesian source of pure, ancient snow-melt running free out of the tap, but then we decided to wreck it for a few profiteers who wanted to dairy inappropriately.

Despite the unambiguous negative effects for Christchurch, **the city was not consulted** on this plan change or invited to share in the discussion. Or in fact even made aware of the impacts that such a strategy will have on the city's future water and health. Only after the legislation has been drafted did ECan ask for feedback. And through such a complicated on-line portal that only the most dedicated would persevere with it.

And finally, like many I am wondering why the draft has been **written under the emergency legislation**. Is it just to avoid an appeals process via the Environment Court?

I would ask you please to consider that if a farming practise is degrading land or water, it is by definition not a sustainable practise. Don't give us lightweight legislation that allows that degradation to continue. It is the definition of short-sighted profit, before long-term health and wellbeing.

Many thanks and most sincerely,

Tanya Didham

**Council estimates the cost to remove nitrates at \$800 million to \$1.6 billion.*