



Submission on Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan

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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

Return your signed submission by 5.00pm Friday 13 September 2019 to:

Proposed Plan Change 7 to the Land and Water Regional Plan
 Environment Canterbury
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 Christchurch 8140

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Trade Competition

Pursuant to Schedule 1 of the Resource Management Act 1991, a person who could gain an advantage in trade competition through the submission may make a submission only if directly affected by an effect of the proposed policy statement or plan that:

- a) adversely affects the environment; and
- b) does not relate to trade competition or the effects of trade competition.

Please tick the sentence that applies to you:

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

If you have ticked this box please select one of the following:

- I am directly affected by an effect of the subject matter of the submission
- I am not directly affected by an effect of the subject matter of the submission

Signature: _____ Date: 9/9/19

(Signature of person making submission or person authorised to sign on behalf of person making the submission)

Please note:

(1) all information contained in a submission under the Resource Management Act 1991, including names and addresses for service, becomes public information.

- I do not wish to be heard in support of my submission; or
- I do wish to be heard in support of my submission; and if so,
- I would be prepared to consider presenting my submission in a joint case with others making a similar submission at any hearing

I am Chair of the Tenants Protection Association. I have spoken to some of the more vulnerable tenants in our city in recent times, about the quality of the water of our city and region. People are very worried about the quality of our region's water, and concerned that the body they would expect to be protecting their interests – ie, ECAN – seem to be letting the people of Canterbury down.

Please note: I do NOT intend to follow the structure of your submission form. Expecting people to cite chapter and verse of the pages of the policy is itself undemocratic and unreasonable. People need to be heard on the issues they raise: not limited by their ability to follow bureaucratic obligations.

My submission is as follows:

The Christchurch aquifers which provide an old and pure source water for Christchurch residents are highly valued by the people of Christchurch.

Some-time 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 nitrates to leach.

I believe ECAN is aware of this.

Your own website states that “Environment Canterbury’s role is to... protect it at its source”

However what this plan change does - in the guise of pretending to lower nitrate levels into the Christchurch aquifers - is to allow for decades of increases. It does too little, and takes for too long to do it.

The current average for the deeper wells from which we extract water is around 0.477mg/l.

The proposed increase in the Christchurch area is a target of 3.8mg/l on average. That is a massive, unacceptable and dangerous increase in nitrate levels.

Both I and the vulnerable tenants I have spoken to are not prepared to tolerate this situation.

I am further concerned that this is only the average and the level in some areas could be substantially higher. Worse again, I can find no penalties for going above these levels. As I read it the effective allowable level could be in some areas at some times see the drinking water hit a maximum of 11.3 mg/l.

To go from a very rare pure water source that is old water to allow such a massive increase in nitrates is in my view not “protecting our water at its source”. Instead I consider this to be environmental vandalism in the extreme. I know many others believe this as well.

Further, the allowable average for the Waimakariri area is even worse at 5.65mg/l. This means the people in our neighbouring district pay an even higher health price. Given that this is again an average, and again there is no mention of penalties this is even more scary for the people of Waimakariri.

Interestingly in their notification to Christchurch residents of this scheme the pamphlet delivered to letter boxes starts "Calling all Canterbury residents-particularly if you live in South Canterbury or Waimakariri "- almost as though it wants to deter those in Christchurch from reading it.

However , even when they do there is no mention of the damage to the Christchurch drinking water aquifers and the huge increase in nitrates.

The ZIPA itself says (p25) "Any increase in nitrates is likely to be below the maximum acceptable value defined in the NZ Drinking Water Standards". This is beyond disturbing! It almost feels as though ECAN didn't want to actually be frank about the massive increase in nitrates that you are allowing.

I know Ecan says that the nitrates are "in the past": and ECAN portrays the approach as taking action on the issues. However in my view – and again in the view of others - the action is slow and tortuous and completely insufficient and will not protect the aquifers fast enough.

There is no mention of the cost of any attempt to remedy that to Christchurch residents either individually or as a community through its Council. This is an absolute breach in my view of the responsibility of ECAN to explain what it is doing so that public input is informed and rationale.

In addition, ECAN's explanations on your own website are extremely complex. I can find no quick summary sheet to that outlines the key points and implications of decisions being taken and nothing explaining to Christchurch people what the impact of this plan change is on them. It feels to me and to others that you really don't want to hear from Christchurch people. The structure of your own submission form is a case in point.

In this case the external costs of certain types of production in some areas of the Waimakariri District are made exempt for the farmers and externalised to the city and the community living nearby. There is no real mention, except in a footnote of a guesstimate of the cost of remediation. But some estimates I have seen have put that as high as \$1000- \$2000 per annum per household in the Christchurch area. That is absolutely massive - and way too high a price to pay for a lack of action on nitrates from the very body charged with protecting our water at its source. Additionally, I see no attempt to sheet this cost back to the industries that are producing this cost.

Certainly there are no Christchurch representatives on the working group that did the Zone Implementation Programme Addendum. The introduction talks of local residents only and a councillor from Waimakariri, and ECAN but not the Christchurch City Council. I note some representatives are farmers - who would normally be judged as conflicted in this issue facing local government.

I am aware that Christchurch City Council has given views, albeit it seems to me that ECAN did not seek this willingly. When the CCC was finally allowed to give a view, their arguments have been completely dismissed by ECAN. And yet that is nearly 400,000 people who are vitally impacted.

It is essential that Christchurch aquifers continue to have a low level of nitrates. I understand from the City Council's submission that there is major damage to the ecosystem and stygofauna above 0.44mg/l and there is a comprehensive Danish study which links nitrate levels above 0.87mg/l with an increase in colorectal cancers.

The health impacts of these massive increases in nitrates have not been considered in the report, either on the ecosystem or on human health and yet ECAN considered the Danish report robust enough to ask the Ministry of Health to do further research on this. I would expect the water source protector to take a precautionary approach on this

ECAN has only modelled the nitrate management targets based on the 50th percentile and not the more precautionary 95th percentile. Again this is high risk and the risk sits with the potential total destruction of the deep drinking aquifers by nitrates.

The remedy sought is the same in all cases ...a much faster, and much lower target for action on the nitrate nitrogen incursion. The current proposal is way too slow and the damage way too great and the reductions way too small

I have looked extensively but cannot find anywhere any modelling of the impact of climate change on this and yet over the next decades that impact could be dramatic

The residents of Christchurch in the main have no direct vested interest in any agricultural property in the Waimakariri district and other districts. As I look at the proposals what I see is a huge impact: with costs in terms of health of ecosystems and people; and the massive economic costs of repair. Yet these have been underplayed by ECAN in order, it would seem, to preserve for longer the ability of farmers to destroy the Christchurch aquifers and to externalise those costs – onto other rate-payers, and perhaps the taxpayers of New Zealand.

What I believe ECAN must be doing is requiring significantly improved farming practices, and insisting that these are done urgently. If this was to occur, the reduction of the impact on our waterways could be major. But it must start now: the longer we wait the more negative the impact and the more drastic the future actions we will need to take.

The damage to date is major. The lack of open-ness about this by ECAN to the wider population is disturbing. Water is the most precious taonga we have and Christchurch has a very rare and pure system. To allow it to be wantonly polluted is outrageous.

As a final insult to the people of Christchurch ECAN has done this plan change under legislation which means that we cannot appeal to the Environment Court on the merits of the case. Use of that Act is horrific in this instance when our very drinking water, the health of the aquifers, and the health of the population is at stake, not to mention the hugely high cost this continuing practice imposes on all residents in Christchurch.