

From: [Patrick Mckendry](#)
To: [Daniel Hartwell](#)
Cc: [Mailroom Mailbox](#); duffina@hotmail.com; [Paul Carrant](#); [Ruth Brown](#)
Subject: Re: Submission: Objection to Plan Change 7 to Canterbury Land and Water Regional Plan
Date: Thursday, 12 September 2019 5:03:56 PM

Well put Dan

Have you considered running for office ?!

(Only half joking)

Paddy

Sent from my iPhone

On 12/09/2019, at 2:34 PM, Daniel Hartwell <drdanhartwell@yahoo.co.uk> wrote:

To whom it may concern

Please find enclosed submission objecting to the weak nitrate level targets outlined in this plan.

The official submission document is attached.

In the future could Ecan please consider using a fillable e-form to aid accessibility, legibility and promote submissions.

The form summarises my objections based on (more legibly)

1. Public health grounds
 - a. Recent Danish Study clearly demonstrated increased colorectal cancer risk in those drinking water with nitrates > 0.87mg/L
 - b. Known risks to babies drinking water with high nitrate levels
2. Enforcability
 - a. The 6 fold increase in average nitrate levels does not appear as a limit or target in the document and therefore has no status in law as a legal limit
 - b. The thresholds described are only averages, based on a 50% accurate statistical model
3. Economics
 - a. Process for water treatment and removal of nitrates is reverse osmosis. This is expensive and requires significant new infrastructure – the costs falling on Christchurch rate payers rather than the polluters
4. Process
 - a. There has been a subversion of democracy within the recent history of Ecan whereby individual votes of rural dwellers are worth more than those of urban populations, where many rural representatives

are conflicted (see Auditor general), where central government has used unelected commissioners, Gerrymandering, abnormal exemptions, removed water conservation orders and used funding from asset sales to fund major irrigation projects – all with the aim of promoting & supporting unsustainable and inappropriate farming (esp intensive high stocking dairy) on unsuitable soils in the face of clear science and urban objections.

I submit that we should be taking a precautionary approach using a statistical model with 95% probability that deep water aquifer nitrate levels will not increase above 0.8mg/L.

This will be undeniably difficult for those who have chosen a risky and unsustainable business plan in the face of clear science and relied instead in the political hegemony to protect their investment at the expense of the environment, and that land use changes may well have to occur.

If the planned allowed increase in nitrate levels is allowed, I further submit that there should be an assessment of the cost of building infrastructure for treating water in the future as part of this plan, and that this cost be front loaded onto nitrate polluters now through additional levies and placed in a growth fund ready to be used solely such a purpose once nitrate levels rise to levels that impact on public health.

Kind regards

Dr Dan Hartwell

<Plan Change 7 completed Ecan submission Dan Hartwell .pdf>