

## Comments

### LTP 2021-31

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<b>First name</b>	Rosalie
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<b>Are you submitting on behalf of an organisation?</b>	Yes, I'm submitting on behalf of an organisation
<b>Which organisation are you submitting on behalf of?</b>	Mackenzie Guardians Incorporated
<b>Which age category are you in?</b>	-
<b>Do you have any further comments on the activities proposed in specific portfolio/s (please select all those you wish to comment on):</b>	
<b>Where do you live in Canterbury? Select your district below:</b>	-
<b>Would you like to see us investing in the following initiatives in your area? Kaikoura</b>	
<b>Would you like to see us investing in the following initiatives in your area? Hurunui</b>	
<b>Would you like to see us investing in the following initiatives in your area? Waimakariri</b>	

**Would you like to see us investing in the following initiatives in your area? Christchurch**

**Would you like to see us investing in the following initiatives in your area? Selwyn**

**Would you like to see us investing in the following initiatives in your area? Ashburton**

**Would you like to see us investing in the following initiatives in your area? Mackenzie**

**Would you like to see us investing in the following initiatives in your area? Timaru**

**Would you like to see us investing in the following initiatives in your area? Waimate**

**Would you like to see us investing in the following initiatives in your area? Waitaki**

**Do you wish to speak to your submission?** Yes

*We may use your phone number to contact you to arrange attendance at a hearing. This information will be kept private.*

**Phone number**

**How did you find out about giving feedback?**

**From:**  
**To:**  
**Subject:** LTP submission from Mackenzie Guardians Inc.  
**Date:** Saturday, 10 April 2021 5:06:21 pm  
**Attachments:** [Submission ECan LTP 2021-31 Mackenzie Guardians.pdf](#)

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Please see attached LTP submission.

R. Snoyink and L. Weir

For Mackenzie Guardians Inc.



**Submission to Environment Canterbury Regional Council Long Term  
Plan 2021 -31**

**Submitter:** Mackenzie Guardians Inc.

**Address for service:** The Secretary, C/-

**Phone:**

**By email to:**

**Introduction**

Mackenzie Guardians is an Incorporated Society, formed in 2009. The aims of the Society are to promote the protection of the natural/naturalistic wildlife, water, vegetation, heritage, and landscape values of the Mackenzie Country. Mackenzie Guardians have participated in several resource consent applications and plan changes relating to the Mackenzie Basin.

Thank you for the opportunity to provide feedback on the Regional Council Long-Term Plan.

Mackenzie Guardians (the Society) support increased expenditure for actions to address the following issues:

**Climate change**

Mackenzie Guardians consider climate change to be the most important issue to be addressed by the Regional Council. Urgent action is required to mitigate climate change effects of warming temperatures, fire, and flood events. Vulnerable ecosystems in the Mackenzie are at risk from the changing climate.

**Water**

The Society supports the funding required to align subregional and regional plans with the Government's Essential Freshwater Reforms 2024.

The Society supports the fundamental concept of Te Mana o te Wai in managing freshwater, and the hierarchy of obligations that prioritises:

- (a) first, the health and well-being of water bodies and freshwater ecosystems
- (b) second, the health needs of people (such as drinking water)
- (c) third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.



The Society supports Option 1 action to revive braided rivers and protect wetlands but also requests action to revive other highly valued water bodies in the Mackenzie, under stress by agricultural runoff. These include the braided rivers in the Mackenzie and lakes eg Alexandrina, McGregor, Middleton, Wairepo Arm and Kelland Ponds. The Society seeks better protection of source water, the mauri of the Mackenzie's alpine rivers, lakes, streams and aquifers.



*Figure 1 Cattle grazing near Omarama stream.*



*Figure 2 Pugging by cattle in a small tributary of the Omarama Stream.*

Stronger action is required to address the pollution of ground and surface waters in the Mackenzie. The pugging of side streams is a significant problem as it results in silt and nitrate draining into the main river system after each rain.

Recent research has shown the nitrate MAV of 11.3mg/L is now an unacceptable limit and needs to be reduced to 1mg/L to protect both human and ecosystem health.

The Society is opposed to the Managed Aquifer Recharge (MAR), and request that ECan ratepayer funding is not used for this concept or used as a model to replicate in other areas around Canterbury. It should not be used in the Mackenzie Basin to manage or improve freshwater. What it does is shift the nitrate pollution from one area to another.

## Land

The Society supports Option 1 in relation to land matters.

Land use change in the Mackenzie has resulted in the irreversible loss of unique indigenous biodiversity and natural landscape values. The Mackenzie Basin is approaching several 'tipping points' in relation to ecological and landscape values. The Mackenzie Basin is important to all New Zealanders hence resource consent applications and variations of consents for water take/use/discharges which affect ecological and landscape values, should be **publicly notified**. Public participation is necessary for sound decision making.

The Society supports stronger compliance, enforcement, and prosecution for breaches in relation to water and land use change resource consent applications.

The Society supports increased funding for wilding conifer, Russell lupin, wallaby, and feral cat control across Canterbury and in the Mackenzie Basin.

Pine plantations owned by the Regional Council in the Mackenzie should be removed. The Society understands that ECan own the Tekapo Regional Park. This is a plantation which should be removed. The Society requests that no further applications are granted to plant pine forests in the Mackenzie.

The Society approves expenditure on native forest planting across Canterbury, but these would need to be carefully considered before planting in the open, dry natural landscapes of the Mackenzie Basin.

The Society understands the Canterbury Regional Pest Management Plan (CRPMP) lists Russell lupins as a biodiversity protection pest which means they can be sown without the requirement to control the spread. Given the threats posed to indigenous biodiversity and the Mackenzie's natural landscapes, and the costs of control, the Society is concerned at ECan's neutral stance on Russell lupins.

The Society requests that the pest status of Russell lupins be upgraded to stop the spread both in the Mackenzie Basin and to catchments which so far are clear of the pest weed. It should be prohibited to plant lupins as a fodder crop.

The Society also requests a review of the CRPMP to control feral cats. The Plan currently lists feral cats as an Organism of Interest. Feral cats are serious predators killing invertebrates, lizards, and braided river nesting birds. They are an increasing problem in Canterbury and especially in the high country. The Society requests that feral cats be reclassified as pests in the CRPMP with the objective of eradication. The Regional Council should work with other authorities to reclassify and control feral cats in Canterbury.

The Society wishes to be heard in support of this submission.

Rosalie Snoyink and Liz Weir  
On behalf of Mackenzie Guardians Incorporated  
11 April 2021

