



**Submission on the  
Environment Canterbury Draft Annual  
Plan 2010/11**

from:

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Sustainable Otago Christchurch (SOC) is an incorporated membership society, formed in 2005. SOC has the vision of Christchurch people "practising, living and demonstrating sustainability in all that they do." (See our website [www.sustainablechristchurch.org.nz](http://www.sustainablechristchurch.org.nz))

SOC's registered charitable aim, which recognises [Te Tiriti o Waitangi/The Treaty of Waitangi](#) as a foundation, is to actively contribute within Otago-Christchurch to opportunities and means for achievement of long term, strong sustainability. In trying to make a difference, and head in that direction, SOC members seek to:

- ensure that all people have their basic needs satisfied,
- so that they can live in dignity, in healthy communities,
- while having the minimum adverse impact on natural systems,
- both now and in the future.

We are grateful for the opportunity to contribute this Submission on the Draft Annual Plan 2010/11. We wish to speak to our Submission at the hearings on 24-26 May.

At this point we invite the reader to refer to our very substantial Submission last year on the ECAN LTCCP 2009-2019 (downloadable from [www.sustainablechristchurch.org.nz/submissions](http://www.sustainablechristchurch.org.nz/submissions)). In that document we expressed the urgent need to change the direction of the Canterbury development policy towards strong sustainability, a need that has even greater urgency today, but receives little attention in the Draft Annual Plan. We invite ECAN to re-read our last year's Submission in order to familiarize themselves with our case, which in these respects is unchanged from last year.

As laid out in the Draft Annual Plan document, we address the four major issues upon which submissions are invited:

**1. Rating for bovine Tb control 2010/11 local share proposal**

This proposal is to increase the amount we will contribute to the national bovine Tb programme for work in Canterbury.

Bovine Tb is an ever-present risk to community health and economy. For this reason, while it will involve a small increase in the general rate, we support the proposal.

**2. Canterbury Water Management Strategy**

As indicated in the Draft Annual Plan (p 83), "In the short term the proposal is to largely fund the strategy via an Environment Canterbury targeted rate."

We support this proposal as it stands. However, the recent replacement of the ECAN Council by Commissioners and the associated legislative changes raise serious questions about the extent to which the proposal and its wider context will remain as in the Draft Plan. For this reason it is difficult for us to make more specific

comments than those which immediately follow until the Commission's intentions become clearer.

We note that ECAN's Energy group of actions aims to promote energy efficiency. We would like to see the Water quality, quantity and ecosystems group of activities include promotion of water efficiency. All water users from giant dairying operations to small businesses and households should be prompted to improve the efficiency of their water usage. This is essential to meet the compounding challenges of increasing population and decreasing rainfall due to climate change.

The LGA requires ECAN to take a sustainable development approach. Amongst other things, sustainable means not using resources, especially water, faster than they are replenished. The time frame is open-ended. Given the increasing demand for irrigation water and the decreasing supply due to climate change the allocation of water needs to be managed very sensitively. Indeed the precautionary principle should apply where there is uncertainty concerning the amount of water available now and in the future.

Increasing agricultural intensity endangers the water quality in Canterbury's aquifers. Once an aquifer is contaminated it may take centuries to remediate the damage. A typical response to a contaminated aquifer is to drill a deeper well. This is a risky strategy as aquifers are finite and the time will come when a deeper well will not strike water. ECAN needs to monitor closely the effects of agriculture on groundwater as mitigation of ill effects is potentially impossible. No amount of economic activity can compensate residents for the loss of safe drinking water. Sustainable development is not compatible with environmental degradation, especially on the scale Canterbury has seen over the last decade.

### **3. Funding for water management cost recovery**

As indicated in the Draft Annual Plan (p 84), "Environment Canterbury is seeking a more equitable mix of funding for its water investigations and monitoring work – also known as the State of the Environment monitoring – which is required to understand the nature of Canterbury's freshwater resource. Currently this work is funded 100% from general rates." It is proposed "... to recover a proportion (30%) of the cost of this work by consent holders, with 70% from general rates."

We support this in principle, subject to the caveat that, as stated above, the intentions of the Commissioners are not clear. That said, we wish to express some concerns about the details, under the proposed three headings:

1. Water-take consents. It is proposed that there be a sliding scale, whereby charges reduce, as consented volume increases. While economies of scale of operation are often possible, there are usually, at the same time, less-obvious *diseconomies* that apply to the wider environmental system, including waterways and soils. We question the appropriateness of this proposal, since it is likely to encourage larger-scale operations which are generally considered undesirable, from environmental, social and economic points of view.

2. Discharge consents. A three-band system is proposed, based on the type of discharge, the related environmental effects, and the state of the environment monitoring work required. While no details are provided, the general principle of this proposal appears to make sense.
3. Local accountability. This too is a good general principle, although again details are not provided.

**4. Accountability through elected representatives**

We have serious concerns about the Government's recent actions to replace the ECAN elected Council and replace by appointed Commissioners.

It is disturbing to see the spectre of control over Canterbury's water falling into the hands of a few appointed commissioners. The Canterbury Water Management Strategy offered the prospect of collaboration among all water users and local accountability. Just as essential for human life as air, water should be acknowledged and treated as a commons and not privatised. Water users should have a water privilege, not a water right. The responsibility for managing Canterbury's water resources lies with all the people of Canterbury and it should be returned to them.

**5. Additional comments/points we wish to cover in our submission**

SOC supports the funding of the Immediate Steps biodiversity restoration programme. Canterbury is one of the most modified environments in New Zealand and only a tiny fraction of pre-human biodiversity remains. The ecosystem services that preserve the soil fertility and water potability that make life here pleasant and possible are endangered. A vital part of the Canterbury Water Management Strategy is halting the decline of biodiversity in Canterbury. It is essential that this receives sufficient funding so that it is not just a token effort.