

22 April 2016



Freshwater Consultation 2016
Ministry for the Environment
PO Box 10362
Wellington

By email: watersubmissions@mfe.govt.nz

Dear Sir or Madam

Canterbury Water Management Strategy Regional Committee submission: Next Steps for Fresh Water Consultation Document

Thank you for the opportunity to comment on the Next Steps for Fresh Water Consultation Document. We apologise for the delay in providing this submission, but were advised by Ministry for the Environment representative Nick Vincent that a late submission would be accepted.

We support the points raised by Environment Canterbury in their submission, but wanted to take the opportunity to provide further comment on proposal 4.1: Freshwater Funding. The attached submission details our thoughts in this area and draws from extensive discussions on the matter.

In the interests of avoiding any duplication of effort, we would welcome the opportunity to contribute to the further development of the Freshwater Fund signalled in the Consultation Document. We echo Environment Canterbury's comments in their submission, noting that an inclusive process of developing this policy would ensure the delivery of meaningful, practical solutions to the freshwater issues that we face.

Yours sincerely

Andy Pearce



The Regional Committee of the Canterbury Water Management Strategy

Submission

Next Step for Freshwater 2016

April 2016

1. The Regional Water Management Committee of Canterbury Regional Council is a committee of Environment Canterbury, and functions under the Canterbury Water Management Strategy framework.
2. The Committee thanks the Ministry for the Environment for the opportunity to make a submission on the *Next Steps for Freshwater 2016*.
3. The Canterbury Water Management Strategy (CWMS) was signed by the Canterbury Mayoral Forum in 2009. It is a partnership between Environment Canterbury, Canterbury's city and district councils, Ngāi Tahu, and water stakeholders.
4. This regional committee of CWMS consists of community and rūnanga appointees as well as regional and local council representatives. It has responsibilities for issues that cut across the 10 water management zones throughout Canterbury – each of which has a committee made up of community and rūnanga appointees as well as regional and local council representatives.

Context

5. The regional committee has examined in depth possible funding criteria for projects that contribute to the CWMS targets – this was in response to a request for advice from the Environment Canterbury Commissioners on 'the use of Environment Canterbury funding for public benefit element of infrastructure projects'.
6. Several working group meetings and extensive discussions of the full committee have agreed a consensus view that has been recommended to the Environment Canterbury Commissioners.

Submission points

7. We support the points raised in the Environment Canterbury submission, but wish to provide additional comment in relation to section 4.1 Freshwater Improvement Fund.
8. We draw to your attention the criteria that have been recommended to Commissioners. They are as follows:

"While public funding should be a last resort, there could be a case for Environment Canterbury to provide public funding (through a rate) to contribute to only the public benefit elements of an infrastructure project, if the following criteria were satisfied.

The project:

1. *Delivers significant, demonstrable ecological, social and cultural benefits over and above the alternatives (including doing nothing);*

2. *Requires only a one-off capital investment (i.e. other funding mechanisms are appropriate for ongoing activities);*
3. *Is a cost-effective way to achieve goals;*
4. *Benefits a group wider than the immediate users (i.e. clear identification of beneficiaries is required);*
5. *Environment Canterbury should not help underwrite private gain;*
6. *Contributes to the achievement of other public policies or strategies (if relevant); and*
7. *Has obtained resource use consents that may be required (including any obligation to avoid remedy or mitigate effects).*

Good investment principles should be followed when assessing the project (including a risk assessment and cost-benefit analysis). In addition, an assessment of the scale of the benefits and the affordability of the project, including the ability of a local community to meet the costs, would help to determine the mix of funding and how to rate (i.e. targeted or regional).”

9. We note the similarities between our criteria and those proposed in the consultation document, and also that our criteria 7 is additional to any in *Next Steps for Fresh water*. The reason for this particular criterion was to require projects that do not have environmental improvement as their primary purpose to have given full consideration to environmental requirements.