Submission on Action for Healthy Waterways

To Ministry for the Environment

Introduction

1. Aoraki Development thank the Ministry for the Environment for the opportunity to submit on the Action for Healthy Waterways proposals.

2. This submission is made by Aoraki Development 2c Sefton Street East, Timaru

3. The contact person is Personal details removed who can be contacted at Aoraki Development, phone Personal details removed

4. Aoraki Development is the Economic Development Agency for the Timaru District and is a 100% owned Council Controlled Operation (CCO) of Timaru District Council.

5. Aoraki Development is a member of Economic Development New Zealand (EDNZ) which is a national not for profit that empowers and enables individuals and organisations either practicing, or associated with, economic development across New Zealand.

6. Aoraki Development could not gain an advantage in trade competition through this submission.

Preface

7. Aoraki Development prefaces its submission by making the following comments:

   a. As an economic development agency, the growth and prosperity of the people and community of the Timaru District, and indirectly the wider Central South Island, is at the centre of all we do.

   b. This is in full alignment with the Governments Living Standards Framework, Local Governments Wellbeing Standards and encapsulates the true meaning of as Inclusive Growth ethos being “that every member of a community has the equal opportunity to contribute to and benefit from inclusive prosperity”.
Action for Healthy Waterways proposals

8. We fully respect the mana of our freshwater – TeMana o te Wai.

9. We also fully support the stated positioning statements in the Action for Healthy Waterways discussion document summary that
   a. New Zealanders want to be able to swim, fish, gather mahinga kai, and enjoy freshwater as our parents and grandparents did.
   b. We also need clean water to drink and irrigation to support a sustainable economy.
   c. Our water is suffering as a result of human activity – urban development, agriculture, horticulture, forestry, and other activities – and that more robust regulation, monitoring and enforcement need to be fully considered.

10. There is no doubting every New Zealander desire healthy waterways and, in our view, there is widespread agreement and acknowledgment we can all do better, and that improvement and change needs to happen.

11. There is a clear need for an improved sustainable approach to water resources and land use now and into the future, and the Action for Healthy Waterways proposals require due consideration of the impacts and opportunities associated with three key areas – namely environmental, social and economic.

12. However, as warrants a topic of this importance, we do not believe the proposals impacts on these three key areas have been fully investigated and assessed to the extent needed.

13. The detailed assessment of the economic impacts and opportunities associated with the proposals in our view appear to be have been given only cursory consideration if at all.

14. The “flow down” impacts of the proposals on our rural community, through to business & industry and wider community, are anticipated to be significant but need to be better understood by all concerned.

15. It is anticipated “on-farm” operational structures, costs and efficiencies will all be impacted. Compliance costs, stocking and cropping levels, debt structures and ongoing profitability and viability being an example of these.

16. The cost and timeframes associated with realigning farming and business operations and practices, to meet the proposals new regulatory requirements, also needs more detailed assessment and consideration.

17. A collaborative approach to extensive & balanced assessment of these key environmental, social and economic considerations is needed involving a comprehensive and structured engagement with affected parties over an appropriate timeframe.
18. We also seek better clarity and detail on the impact of the proposals on water costs and accessibility across our wider communities – specifically as it relates to both residential and commercial users.

SUMMARY

19. There is a need to more fully understand the impacts and effects of the Action for Healthy Waterways proposals across the three key environmental, social and economic areas. Aoraki Development therefore seek the following from the Ministry of Environment:

a. engage appropriately skilled and industry accepted professionals to undertake more detailed balanced assessment and analysis of these areas and facilitate full engagement with affected parties through expert caucusing prior to further or final decisions being made.

b. ensure that the positive efforts already being undertaken by various entities are fully considered when implementing any final decisions. By this we mean any new regulatory milestones or targets are appropriately allocated for those already making good progress in this area.

We thank you for consideration of our submission and advise we are available on request to discuss further as needed.

29th October 2019