SUBMISSION ON
ACTION FOR HEALTHY WATERWAYS
(WAIMATE DISTRICT COUNCIL)

The present document constitutes a submission by the Waimate District Council (WDC) in response to the discussion paper ‘Action for Healthy Waterways’ published by the Ministry for the Environment (MfE) on September 2019. The Waimate District Council thanks the Ministry for the Environment for the opportunity to provide a submission on the discussion paper.

Summary

The WDC supports the general purpose of the MfE’s proposal (i.e. the optimization of freshwater management at the national-level and the prevention of further degradation of freshwater resources), especially due to the criticality of freshwater to all 4 well-being factors. Parallel to such general support of the initiative, the WDC observes 4 primary critiques vis-à-vis the MfE’s proposal, hereby summarized: firstly, the absence of multi-dimensional cost-benefit analysis of implementation impacts on communities and sectors; secondly, the inapplicability of a unitary action plan/model on regions with diverging features, and thus the need for utilizing localism in the development of such plans; thirdly, the need for defining support mechanisms for councils/territorial authorities that shall be engaged in resource-intensive implementation cycle; and fourthly, the feasibility of the proposed limitation levels for dissolved reactive phosphorus and dissolved inorganic nitrogen, especially in terms of effects on local economy and the agricultural sector’s engagement/participation in the scheme. The WDC holds that the MfE’s proposal must be accordingly modified to reflect, at the very least, the 4 points summarized above and elaborated below.

1. The Necessity of Comprehensive Multi-Dimensional Utility Analysis

The MfE’s analysis of the implementation impact, as formulated in the paper, is inadequately 1-dimensional due to the excessive dominance of the environmental outcome factor over the conducted analysis. The WDC strongly recommends that a multi-dimensional analysis of the implementation outcomes be conducted, specifically comprising socio-economic utility analysis of implementation impacts on rural communities. Such prospective multi-dimensional analysis would ideally be conducted in the context of the 4 well-being factors nexus.
2. The Necessity of Incorporating Localism in Operational Model Development

The WDC holds that the formulation, and subsequent operationalization, of any implementation model must consider regions' inherently divergent features and requirements, and that the efficiency of a unitary model for all regions, sub-regions, and sectors, regardless of locally-specific topographies, is highly doubtful and is first to be ascertained by exhaustive study. It is the WDC’s view that each region or sub-region may require its own case-specific policy solutions, and that localism, specifically in terms of regionalism and ‘sub-regionalism’, is to be utilised in the process of operational model/framework development.

3. The Necessity of Developing Support Mechanisms to Councils

Support mechanisms for councils as to assist/enable such entities to either enact the plan or to absorb the post-implementation costs are critical, and are yet to be defined in any form or capacity. The implementation cycle of the plan’s proposed provisions, in all its stages, shall be resource-intensive, in both financial and human resources terms, and could potentially exceed the current capabilities of a number of councils and most territorial authorities. In the absence of necessary and sufficient resources, the prospect of successful implementation of any improvement/mitigation plan shall be a mere conjecture. The Central Government must consider such a critical requirement by means of direct communication with councils and territorial authorities in need of assistance.

4. The Utility of Revising the DRP and DIN Limitation Levels

The WDC is uncertain as to the feasibility of the implementation of the proposed limitation levels on dissolved reactive phosphorus (DRP) and dissolved inorganic nitrogen (DIN), especially in the defined timeframe. The MfE is hereby advised that such limitations are likely to generate significantly adverse economic consequences for local agricultural sectors and rural communities by means of critical reduction of production output. The materialization of such negative consequences could also result in the reduction of the aforementioned stakeholders’ willingness to participate in the implementation process. In such context, new limitation levels for DRP and DIN may be defined as to enhance implementation feasibility.

For any queries regarding the WDC submission, please contact:

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