Submission by

PrimePort Timaru

Ministry for the Environment

on the

Action for healthy waterways – A discussion document on national direction for our essential freshwater

October 2019
INTRODUCTION
1. PrimePort Timaru Limited (PrimePort) thanks the Ministry for the Environment for the opportunity to submit on the Action for Healthy Waterways proposals.

2. This submission is made by PrimePort Timaru Limited, Maritime House, 1 Marine Parade, Timaru.

3. PrimePort is owned by a 50/50 joint venture between Timaru District Holdings Limited and Port of Tauranga Limited.

4. The contact person is Personal details removed, Chief Executive who can be contacted at PrimePort, Personal details removed

5. PrimePort could not gain an advantage in trade competition through this submission.

PREFACE
6. PrimePort prefaces its submission by making the following comments:

(a) PrimePort’s purpose, other than to operate as a successful business (Port Companies Act 1988 section 8) is to provide enabling infrastructure that connects the regions exporters and importers to the world.

(b) The South Canterbury region has enjoyed an economic upturn in recent years, largely due to increased output and value from the primary sector, much of this linked to irrigation, changing land use and efficiency gains.

(c) Bulk trades imported and exported via PrimePort over the 10 years 2009-2019 increased from 750,000 tonnes to 1.7 million tonnes, a 127% increase.

(d) The Timaru district GDP growth to 30 June 2019 was 1.8% versus national GDP growth of 2.5%. The Timaru district unemployment rate as at 30 June 2019 was 2.1% versus the national unemployment rate of 4.1%

(e) Any undue tightening of the regulatory environment has the potential to increase costs and slow, or even reverse, regional economic growth linked to the primary sector.

(f) The environmental and cultural (Te Mana o te Wai) focus of the ‘Action for Healthy Waterways’ proposals must be carefully balanced against the economic and social needs of our communities and region.

ACTION FOR HEALTHY WATERWAY PROPOSALS
7. We 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; and

(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 along with other measures.

8. We support the principle of Te Mana a te Wai but caution against establishing a regulatory system that makes ‘essential human health’ subservient to the ‘health and wellbeing of the water’.

9. New Zealanders’ desire healthy waterways and, in our opinion, there is widespread agreement and acknowledgement we can all do better, and that improvement and change needs to happen.

10. There is a 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 four wellbeings: environment, social, cultural and economic.

11. However, as warrants a topic of this importance, we do not believe the proposal’s impacts on each of the four wellbeings have been fully investigated and assessed to the extent needed.

12. The detailed assessment of the economic and social impacts and opportunities associated with the proposals in our view appear to have been given, at best, only cursory consideration, if at all. This limited assessment diminishes the results for all four wellbeings because the effect is to promote one over another in what is presumably an unintended consequence.

13. The “flow down” impacts of the proposals on our provincial/rural communities, through to business and industry are anticipated to be significant and need to be better understood and accepted by all concerned before regulation is enacted.

14. Extensive infrastructure upgrades will be required to meet the proposed three waters improvement (potable water, waste water and stormwater). These upgrades will have a high cost burden, particularly on smaller communities with limited ability to pay or recover the costs. Careful consideration of the priority areas and spreading the costs equitably is required.

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

16. The cost (social, environment and economic) and timeframes required to meet the proposal’s new regulatory requirements need more detailed assessment and consideration.

17. A collaborative approach to extensive and balanced assessment of these key environmental, cultural, social and economic considerations is needed. This should involve a comprehensive and structured engagement with affected parties over an appropriate timeframe.
18. Consideration should be given to broadening the exceptions for major hydro schemes, to include smaller current, and potential new hydro schemes. The blanket protection of wetlands and streams could inhibit appropriate development of new emissions free power generation through expansion of the nation's hydro electric capacity.

19. A blanket restriction of further intensification of rural land until 2025 will curtail development and slow growth. Restrictions should be confined to catchments with significant water quality issues. Farmers should have the ability to clear invasive woody weeds, such as gorse and broom, and return the pastures to productive use. We note that gorse is also a weed that leaches nitrogen into waterways.

Summary
20. While there is a need to improve our environmental outcomes for freshwater, there is a need to more fully understand the impacts and effects of the Action for Health Waterways proposals across the four wellbeings, i.e. environmental, cultural, social and economic areas. The impact analysis needs to include all four wellbeing conditions in order that any determinations are thorough and balanced. PrimePort therefore encourage the Ministry of Environment to engage appropriately skilled and industry relevant professionals to undertake more detailed and balanced assessment and analysis of these areas and facilitate full engagement with affected parties and communities through expert caucusing prior to further or final decisions being made.

29 October 2019

Chief Executive
PrimePort Timaru Limited