ESSENTIAL FRESHWATER – ACTION FOR HEALTHY WATERWAYS

Introduction

1. The Opuke Kāhui Ako (a Community of Learning) appreciate the opportunity to provide comment on the most recent programme for initiatives for freshwater management in New Zealand set out in the Action for healthy waterways discussion document.

2. A Kāhui Ako is a group of education and training providers that form around children and young people's learning pathways, and work together to help them achieve their full potential. The Opuke Kāhui Ako is comprised of 9 schools (Chertsey School, Dorie School, Lauriston School, Mayfield School, Methven School, Mt Hutt College, Mt Somers Springburn School, Our Lady of the Snows School and Rakaia School) and 8 Early Childhood Education Services (Dorie Community Preschool, Educarents Canterbury, Leap Ahead Early Childhood Centre, Methven Playcentre, Methven Pre-school Learning and Child Care Centre, Rakaia Little Learners Preschool, Rakaia Playcentre, Skiwilland and Star Brights Homebased Care) based around the foothills of Opuke (Mt Hutt) and along the plains bordered by the Rakaia River. Collectively the schools have a student community in excess of 1400 and approximately 90 teaching staff.

3. The communities the Opuke Kāhui Ako work alongside are largely supported by the primary industries (sheep, beef, dairy and arable farming), and their associated services. While this provides economic stability for many of our families, transience between schools within our Kāhui Ako and from schools outside our community affects the social and academic well-being of our ākonga. The continuous changing climate of the Mid-Canterbury agricultural industry, and the transience of our student population, has prioritised the need for us to focus on effective transition programmes and inclusive practices across the Opuke Kāhui Ako. Schools where inclusive practices are being developed will be supported by schools with embedded systems.

Feedback on the proposal

4. Feedback has been sought on:
   - initiatives for freshwater management in New Zealand set out in the Action for healthy waterways discussion document,
   - the draft National Policy Statement for Freshwater management,
   - the draft National Environmental Standard: Freshwater,
   - the proposed updates to S360 stock exclusion regulation

5. The Opuke Kāhui Ako is generally supportive of the main objectives of the proposal ie to improve water quality but has concerns about some of the proposals and the effect these may have on the economic and social wellbeing of the communities which comprise the Opuke
Kāhui Ako, and how this may ultimately affect the ability of the children of this community to reach their potential.

6. Freshwater management in Canterbury is presently coordinated through the Canterbury Water Management Strategy. Environment Canterbury has established ten zone committees which are tasked with reaching a consensus on water management in their respective zones. The National Policy Statement for Freshwater Management is being implemented through sub-regional planning processes. The regional planning framework has been established and catchment-specific frameworks are in place for the majority of zones.

7. The long-term commitment to freshwater management in Canterbury has enabled communities to determine what their priorities are and this early and on-going community participation in the plan-making process has enabled and encouraged behaviour change. It is of concern that this proposal is prescriptive and does not encourage a collaborative approach which is more likely to achieve actual on-the-ground actions at a local level. The short timeframes for implementation and change may result in poorer outcomes, affected by reduced community engagement and fewer opportunities for communities to trial and assess solutions relevant to their unique catchment characteristics.

8. Of key concern is that there is likely to be significant costs to communities and individuals in meeting these objectives which have not been quantified. If significant infrastructure, farm system changes and compliance costs are required to meet the proposals the present economic and social well being of the school communities will likely be affected. There are significant risks to the schools of the Opuke Kāhui Ako if their rural communities are no longer able to support the present number and diversity of families. The economy of the mid-Canterbury region is heavily reliant on agriculture and as such members of the community employed in the agricultural support sector are also likely to be affected by this proposal.

9. A further concern is the mental health and wellbeing of the community. In recent times the community has experienced the uncertainty created through Mycoplasma Bovis, the Zero Carbon Bill, and the pricing of agricultural emissions. The further uncertainty presented by this proposal that has had no economic or social assessment regarding the impact poses a serious threat to the mental health and wellbeing of our community.

10. With the lack of economic and social analysis available for review it is difficult to fully understand what this proposal may mean for the families of our community and ultimately the children of the Opuke Kāhui Ako. The Opuke Kāhui Ako requests that a full independent economic and social impact analysis of the effects of these proposals be undertaken to comprehensively understand their effect. We request that the proposals are then amended as necessary to ensure the key objectives are balanced with the social and economic wellbeing of communities.