

Coalition for Clean Water

[withheld]

Submission on National Policy Statement for Freshwater Management (NPS FM)

Coalition for Clean Water is a coalition of groups and organisations concerned about the Canterbury Water Management Strategy (CWMS) collaboration process. It was formed after a Fresh Water Hui on the 2nd of May 2013.

The coalition includes:

- Royal Forest & Bird Protection Society
- Orari River Protection Group
- North Canterbury Fish & Game
- Water Right Trust
- Our Water Our Vote
- Malvern Hills Protection Society
- Canterbury Aoraki Conservation Board

Most of these groups will present their own submission with regard to the NPS FM.

This submission is to emphasise our collective concern with regard to the so-called collaborative approach that seems to be promoted as the way to achieve the outcomes of the NPS FM.

The Canterbury Water Management Strategy is often seen as an example of collaboration in action. In theory the concept of collaboration is a great way to achieve equitable outcomes. However, in reality, we see something quite different happening.

The principles of the CWMS are certainly laudable. In fact most of our groups have been part of helping to develop the CWMS and were happy to sign off on the principles and targets.

However as soon as the CWMS was ready to roll out, the government stepped in, sacked our elected representatives on Ecan and appointed commissioners. We have noticed that our Regional Council is now strongly driven to increase irrigated land and infrastructure, effectively changing the order of priority of the targets under the CWMS.

There is a fundamental flaw in how the present collaborative process is working in Canterbury. Those favouring development are typically very well resourced and able to retain the best advocates to present their arguments. Those defending the environment are typically volunteers, with limited financial resources, and many lack the time and expertise needed to offer comparatively credible arguments in favour of their views.

The letter attached to this submission was sent to the Ecan Commissioners on

the 28th of August 2013. (Please note that this letter is part of this submission)
This letter notes our concerns and raises a number of questions. Most disappointingly, this letter has never been acknowledged by the Commissioners. This lack of acknowledgement of our collective interests highlights the inequity of the, so-called, collaboration.
This lack of acknowledgement also discourages anyone, without a financial interest in water management or use, to continue to sacrifice valuable time and resources to continue to contribute to the collaborative process in a meaningful way.

The **Coalition for Clean Water** believes it is essential that this document is explicit about *how* regional councils conduct community consultation, and *with whom*, ensuring fair representation and fair democratic process.

This collaborative process also must only take place *after* the science has established environmentally sustainable limits and bottom-lines. Bottom-lines should not be able to be eroded by stakeholders in a collaborative management process, but should be set in stone and should only be able to be revised upwards, to enhance the 'freshwater management unit'.

Stakeholders must represent a cross-section of the community and must be guided by science.

Thank you for considering our submission,

[withheld]

for **Coalition for Clean Water**
28 August 2013

The Commissioners
Environment Canterbury
P O Box 345
Christchurch 8140

Dear Commissioners

On Thursday May 2nd 2013, a 'Fresh Water Hui' was held at the Coalgate Bowling Club. Of the more than 50 people present, there were farmers, landowners, Fish & Game, Forest & Bird, Water Rights Trust, Our Water Our Vote, Canterbury Aoraki Conservation Board, Braid, the Malvern Hills Protection Society, Jet Boating NZ and White Water NZ.

The overwhelming sentiment expressed by attendees was that the current approach to the collaborative process in Canterbury is not working, namely that:

- The quantity and quality of Canterbury's water bodies is still in decline.
- The environmental and recreational targets are not being met.
- Consents are still being issued liberally in catchments where the results will exacerbate over-allocation and cause further water quality decline, in clear breach of environmental targets.
- Water quality limits and environmental flows are not being treated as first order priorities. Instead they are being assigned to Zone Committees and collaborative processes to decide, which inappropriately politicises the outcomes.
- There has been no attempt to measure progress against environmental targets based on measurable outcomes (as opposed to measurable initiatives, which may or may not achieve the desired outcomes).
- Zone committees are not representative. Most are dominated by farming and irrigation interests, including those with direct vested interests in the outcomes.

Fish & Game, Malvern Hills Protection Society, and Water Rights Trust have already withdrawn from the collaborative process as a result of these concerns. Those present resolved to request that you, the ECan Commissioners, seriously consider the following actions to avert a complete loss of faith in your governance by the environmental sector.

Water quality limits and environmental flows

- That the nutrient limits and environmental flows required for ecosystem and species health be determined independently, based on the best available science.
- That based on this, interim nutrient limits and environmental flows be set for all water bodies immediately, with clear timeframes and milestones to achieve them

Representation

- That Zone Committees no longer be given the role of recommending nutrient limits and environmental flows.
- That the function of Zone Committees be primarily to consider

‘how’ to achieve limits and targets once these have been scientifically assessed and determined in a statutory plan.

- That Zone Committees be elected rather than appointed, with genuine representation from each sector

Consents

- That no new consents be issues where catchments are already over-allocated or where water quality limits are likely to be thereby exceeded or exacerbated.
- That Council review existing consents (using its section 128 RMA powers) in order to meet the CWMS environmental targets, in particular to reduce over allocation and achieve adequate environmental flows.
- That consents be more closely monitored and robustly enforced.

The CWMS

- That an independent audit is carried out to measure the extent to which CWMS targets are being met, or are likely to be met, by an independent body such as the Office of the Parliamentary Commissioner for the Environment.

Yours faithfully

[withheld]

On behalf of:

Forest & Bird

Orari River Protection Group

North Canterbury Fish & Game

Water Right Trust

Our Water Our Vote

Malvern Hills Protection Society

Canterbury Aoraki Conservation Board