



Department of Conservation
Te Papa Atawhai

08 October 2010

Bede O'Malley
Chairman
Steering Group
c/o Raewyn Crowther
Environment Canterbury
PO Box 345
Christchurch 8140

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SIGNATURE	R. Crowther

Dear Bede

Re: Draft Canterbury Water management Strategy

Canterbury Conservancy of the Department has been pleased to be involved in the development of the above draft strategy, through our involvement in the Officials Group.

While there is still a lot of work to be done to get the strategy operational the Department supports the basic approach set out in the draft strategy document as a move to what must be a better way of dealing with Canterbury's water management. From the Department's perspective, halting and hopefully reversing the current decline and dire state of indigenous lowland freshwater and terrestrial biodiversity and impacts on recreational opportunities, is an essential outcome of the strategy.

As might be expected given recent history, the Department is hearing some concern regarding 'conservation' (indigenous biodiversity, sports fisheries and recreation) representation within the strategy processes (e.g. the regional and zone committees), and some assumptions that the short-listed infrastructure proposals are more definite than that. The Department's experiences and observations in past and current water allocation and use forums have seen partly a lack of representativeness, but more a lack of open communication and thoroughness in investigating conservation concerns or, in strategy language, the sustainable management principles as encompassed in Part II of the Resource Management Act.

The Department is encouraged by the fact that it has had some very good experiences in Canterbury and elsewhere of working with major water use and other development proposers and in seeing 'win-win' outcomes.

So, it is from both past concerns and good outcomes that the Department stresses the need for the proposed regional and zone committees, the water executive, and the water infrastructure and services entity to have excellent processes of engagement with and consideration of 'conservation' interests and values.

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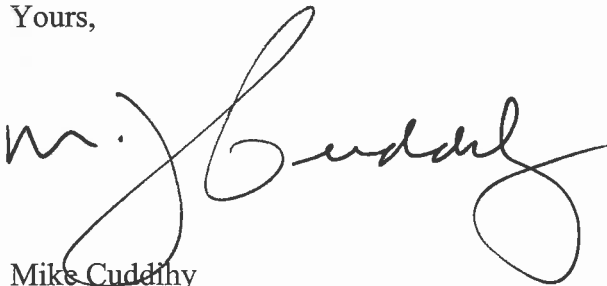
What role might the Department see for itself as the strategy develops? It is probable that the Department will not be represented on the zone and regional committees, except perhaps in an ex-officio role. There is a potential role though, in conjunction with other organisations as at present and subject to staff availability, in providing biodiversity technical information (e.g. indigenous biodiversity monitoring, ecosystem management knowledge and expertise, ecosystem and species priorities) and in assisting to scope issues and peer review draft zone programmes, and in due course, water infrastructure development proposals.

The draft strategy document is still light on the measures that would be needed to give statutory effect to zone and regional programmes, where needed. It is understood that these aspects are still under investigation, but the Department does reinforce the need for such measures and that programmes, or parts thereof, may ultimately be tested or need confirmation within such as the Environment Court.

Not all parts of zone programmes are seen as needing statutory confirmation. The Department sees as important that zone committees are given autonomy for decisions at appropriate levels, and that not all their decisions will require statutory confirmation, e.g. the choices for biodiversity restoration, investigations for water infrastructure, voluntary actions regarding water use efficiencies and nutrient management.

I trust these comments are helpful and the Department looks forward to assisting the ongoing development of the Canterbury Water Management Strategy.

Yours,

A handwritten signature in black ink, appearing to read 'Mike Cuddy', written in a cursive style.

Mike Cuddy
Conservator
Canterbury