

Comments on the draft Canterbury water management system

First of all I'd like to congratulate the Steering Group and Mayoral Forum on the depth, breadth, and quality of this draft water strategy for Canterbury. Also in recognising there will be a lot of challenges ahead in implementing the proposed changes but sticking to great fundamental principles.

I do have a few concerns:

1. Re the priorities and principles – not in what they contain but in how they are separated, as in the majority of the document it refers to the principals.

Currently it states:

Principles that must be met

Fundamental principles have been developed to underpin the strategy.

First order priorities: environment, customary use, community supplies and stock water.

Second order priorities: irrigation, renewable electricity generation, recreation and amenity

Primary principles – sustainable management, regional approach, and tangata whenua

Supporting principles – natural character, indigenous biodiversity, access, quality drinking water, recreational opportunities, and community and commercial use.

These are designed to ensure that our water resource is managed sustainably.

Possible changes

Principles that must be met

Fundamental principles have been developed to ensure that our water is managed sustainably. *(As soon as you use the word resource it puts a to" be used " connotation on it.)*

Primary Principles

- sustainable water management (maintaining / returning natural character, indigenous biodiversity),
- Tangata whenua eg. customary use,
- Quality drinking water for all

Secondary principles

- community and commercial use
- recreational opportunities

Consider regional approach is more an implementation strategy than a principle.

2. A clear definition of sustainable water management is needed.

Which could include "explicit recognition of environmental limits"(p37).

3. The fundamental principles need to be broken down into constituent parts and clearly defined so that they are not open to different interpretations

4. From p37 – "programmes to restore ecological health and functioning to sustainable levels" -*whose level of sustainability –peoples or the inherent native biodiversity of the river?*

5. I think there is a fundamental flaw in that the draft states more water is available and implies that economic growth is a positive benefit. I can see why it this from the point of view of getting investors to develop new improved technologies which will help create solutions however given that

a. “climate change projections suggest the region will become drier and need more irrigation simply to maintain existing outputs from the land”.

b. “Natural systems for delivering water will become less reliable and therefore less able to support current levels of output”.

c. “There are now ten red zones in Canterbury, where water has been fully allocated, and four “yellow zones”, where allocation exceeds 80% of the allocation limit”.

Wouldn't economic stability be preferable? Where water users especially farmers could reliably guarantee their income and markets – based on sound environmental considerations, community welfare and future proofing – possible because they had a steady reliable water supply. This would necessitate looking closely at land use systems and technologies.

6. I share your stated concerns over the zone management system particularly that it may not be possible to get a balanced committee where all interests are represented.

With regards committee composition: “respected members of the community” This phrase is open to different interpretations and is very subjective. Who decides?

The committee is going to be a key success factor to the whole plan –who will train the committee, who will chair, does there have to be a quorum to make decisions, how will decisions be made?

7. Re Water entity: p45

“50/50 local council and private investors -The advantages of such a water entity are - it would have substantial public ownership ensuring that the targets and fundamental principles were adhered to. I don't agree with this statement as it depends on the business interests/perspectives councillors have.

8 The regional water management committee needs to be well organised, staffed and have sufficient power to make sure the zone committees stick to the fundamental principles.

Thank you for taking the time to read this

Yours sincerely

Hilary Iles

34 Hislop St

Geraldine