

**Submission regarding Central Plains Water Scheme**

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To the CPW Commissioners,

I would just briefly like to iterate my concerns regarding the claim for 40 cumecs from the Waimakariri river. My understanding is that the Waimakariri feeds the town aquifers. Can we be reassured beyond reasonable doubt that the city groundwater levels will not suffer a significantly reduced recharge rate? In other words what, if any, long term impact will 40 cumecs have on town aquifers?

The Waimakariri already has toxic algae in lowland areas. Maintaining a high river flow can help reduce buildup of these algae. As high nutrient levels continue to build up due to nutrient run off from intensive farming and treated effluent which is released into the Waimak, what is the expected impact of reduced river flow on the levels of toxic and other algae?

The Waimakariri is a braided river system, with native bird species dependent on lowland streams. Has it been shown beyond reasonable doubt that lowland braided streams will not be adversely affected particularly in the summer months, where they may be at risk of drying up during periods of reduced river flow?

The Canterbury aquifer system is itself a massive water storage reservoir, that has until recently served the needs of the community. If the groundwater in this area is inadequate for intensive farming, then this means that there is a problem with the consent process, which allows water takes that exceed what is sustainable. Consents that are declined by ECAN are usually challenged in the environment court, where the applicant usually wins on the grounds that the law does not take a precautionary approach to environmental assets. If the aquifers are now considered inadequate, then we can only conclude that the system is at fault for allowing intensive agriculture to take place in a region for which it is poorly suited to. Unlike other applications for river water around the country, the Waimak serves many functions and the burden of proof that none of these will be significantly impacted should be on the applicant.

Yours Sincerely,

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