

SUBMISSION ON REVISED CENTRAL PLAINS WATER SCHEME

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SUBMITTER

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Guardianz was formed in 1995 and is an informal group of people who carry out research and make submissions on issues relating to how the interests of taxpayers and the general public can be better served.

This submission was prepared by Grant Nelson and Dr Julie Squire.

As only a limited time has been set aside for the hearing of submissions, we will refrain from requesting that we be heard but this is on the understanding that our submission will be read by the Commissioners.

INTRODUCTION

The revised CPW Scheme will have a variety of adverse effects on the 350,000 people living in Christchurch and the 30,000 people living outside Christchurch. We are concerned that these people did not have their interests adequately represented at the original CPW hearings and the same could apply at the current hearing on the revised Scheme. This could result in insufficient weight being given to protecting their finances, health and general wellbeing. We do not think that their interests should be put on a par with those of a few hundred farmers or kayakers or other special interest groups. The water resources of central Canterbury belong to the people who live there and we consider their interests should rank far ahead of those of all other parties combined.

IMPACTS ON HEALTH AND WELLBEING OF RESIDENTS

The Resource Management Act was designed to protect the environment but it does not do a good job of protecting the interests of the general public. Two months ago, a public meeting was held at the Regional Council offices and a panel discussion took place on the topic 'The RMA protects our health yeah right'. The speakers confirmed our view that the RMA processes are not good at protecting the health and wellbeing of the general public. One of the speakers mentioned that the CPW Commissioners had been dismissive of the submission made by the Canterbury District Health Board Community and Public Health Division. This is unfortunate because they are the only major submitter to have represented the interests of everyone living in the area. They commissioned Wellington health consultants to prepare a Health Impact Assessment on the CPW Scheme. The Assessment was based on an internationally recognised model and it concluded that the CPW Scheme would adversely affect the public and should not proceed.

The Community and Public Health Division is concerned with protecting the health and wellbeing of people living in Canterbury. One of its functions is to ensure that the water which people drink and come in contact with, is safe. In the past it has issued health warnings about drinking water in a number of small communities and has required health

warning signs to be erected at previously popular picnic spots on rivers all over Canterbury. It has experience, expertise and an interest in what happens to water used by the public. It is the only independent organisation which represents all of the people living in the affected area so its submissions should be regarded as being of greater importance than those of all other parties.

We support the submissions made by the Community and Public Health Division of the Canterbury District Health Board. However, we think that in their latest submission they failed to take into account the fact that most of the huge increase in contamination over the past 20 years will gradually seep through over the next few decades. This will make the situation far worse than they have predicted. We also think that they placed too much faith in the draft Canterbury Water Management Strategy. They should have played a prominent role in developing the Strategy over a number of years but were only asked to attend some briefing meetings towards the end of the process. The Strategy was controlled from the start by rural interests and the general public were not represented.

IMPACTS OF NITRATES

Drinking water contaminated with nitrates, viruses, protozoa, bacteria and fertiliser chemicals can be harmful to health. The extent of the harm will depend on the concentration, duration of use and various personal factors. This makes it very difficult to trace the problems caused by contaminated drinking water. While it is easy to show that high nitrate levels affect babies, this should not be regarded as the only problem caused by contaminated drinking water.

We would point out that the MAV. for nitrates is 10 mg/l in the United States and 11.3 mg/l in New Zealand. The accepted safe level is 50% of the MAV.

The Commissioners issued a Minute on 22 June 2009 regarding the effects of nutrient and nitrate contamination on water quality. It was stated that 'The District Health Board has claimed that the proposal will pose a significant public health risk, (but did not provide any quantitative risk assessment to support that claim)'. The Commissioners went on to say that they were not ecology or health risk experts so needed independent assistance. After consulting the applicant, two people were appointed to prepare a report, despite them having no experience in health matters and one of them working for a company which, amongst other things, sells irrigation products and services.

The report which has been presented acknowledges that nitrate contamination will get worse due to the huge increase in intensive farming over the past 20 years and the time lag in contamination showing up. The word 'uncertain' in its different forms appears many times in the report and reference is made in several places to a lack of knowledge. Under these circumstances we think that a very cautious approach to the issue of nitrates and other contaminants is advisable.

We believe that any quantitative assessment of health risks would be pure guesswork and a better indication of future health risks and problems caused by irrigation is past experience of these in Canterbury, New Zealand and overseas.

IMPACTS ON CHRISTCHURCH

Christchurch, is the second largest city in New Zealand and has a population of 350,000 people. They drink and use water every day so even the most minor of effects can impact on a very large number of people. Christchurch residents formerly used nearby rivers for recreation but the Selwyn River has had Health Warning signs along its banks for several years and the same is likely to happen to the Waimakariri River. Increased contamination of Waimakariri River water will adversely affect Christchurch aquifers which are recharged from the river.

Under the revised scheme, water will be taken from the Waimakariri River and aquifers during the summer months when Christchurch aquifers are at their lowest and city water demand is at its highest. The reduced recharge of aquifers will result in salt water and contaminated water getting into the aquifers serving Christchurch.

While claims have been made that contaminated water from west of Christchurch will not seep into Christchurch aquifers, in December 2008 ECan produced a report stating that they now accept that there is horizontal and vertical leakage in Canterbury aquifers.

The Christchurch City Council Water Supply Strategy was confirmed in June 2009 and deals with the major problems and costs facing the city as a result of the current levels of irrigation. The CPW Scheme would make the situation far worse.

The Strategy sets out some measures to reduce consumption but these would be costly for homeowners. If all homes had to have systems to collect, store and pump rainwater and grey water this would cost a total of over \$600,000,000 (Based on Australian experience) water treatment plants would also cost hundreds of millions of dollars. Those who could afford bottled water might start using it at a very high overall cost to the community. If all city residents were to cut their consumption in half this would be equivalent to the water which the largest dairy farm in Canterbury has been given.

If the revised CPW Scheme goes ahead Christchurch residents and ratepayers will end up with a more restricted, contaminated and expensive water supply. They will also have to pay most of the huge cost of environmental damage so overall the CPW Scheme is not in their best interests.

IMPACTS OF UNCERTAINTY AND LACK OF KNOWLEDGE.

It is clear from the reports and submissions on the revised CPW Scheme that there is a huge amount of uncertainty and a great lack of knowledge about what effects the Scheme will actually have. In view of the very large population involved it is essential that a precautionary approach be taken so that the health and wellbeing of present and future generations is not put at risk.

Over recent years two thirds of Canterbury farmers have repeatedly failed to comply with Consent conditions for water and few have taken any notice of the Clean Streams Accord and the availability of nitrate inhibitors. When the Regional Council decided to charge farmers for part of the cost of monitoring Consents for water, farmers mounted a campaign

against this so now all ratepayers face a 10.6% increase in Regional Council rates. These examples demonstrate that farmers are not prepared to do the right thing by the rest of the community or comply with Consent requirements if it costs them any money. Rural interests control the Regional Council so farmers know that they can please themselves what they do. Taking these factors into account, we would caution against placing any reliance on the proposed voluntary mitigation measures or on allowing Consents which are subject to various conditions.

GENERAL COMMENTS

The CPW Scheme was promoted to the Christchurch City Council and the public as a water enhancement scheme which would greatly benefit Christchurch and have no affect on its water supply. Water was to be taken when rivers were at their highest and stored for use in the summer months. It was to be a community based scheme which would benefit the whole community. The Christchurch City Council decided to assist with ratepayer money and its involvement would have been a critical factor in the granting of Requiring Authority.

Today, the Scheme has changed completely and it is very doubtful whether the Christchurch City Council would have got involved originally if they had known then what they know now.

A research report published by Lincoln University shows that the vast majority of the 520,000 people living in Canterbury do not support increased irrigation and what is happening to water in Canterbury. These findings would also apply to the 380,000 people living in the area affected by the CPW Scheme. They should not be forced to accept health risks and have to make big sacrifices in order to help a few hundred farmers make a lot of extra money.