

11 April 2021

Canterbury Regional Council
PO Box 345
Christchurch

Christchurch Office
PO Box 2516, Christchurch 8014
New Zealand
P: +64 3 9405522
www.forestandbird.org.nz

BY EMAIL: mailroom@ecan.govt.nz

Feedback on the Canterbury Regional Council (Environment Canterbury) Long Term Plan Te Pae Tawhiti 2021/31

Forest & Bird wishes to be heard.

Introduction

1. Forest & Bird is New Zealand's leading independent conservation organisation, which has played an important role in preserving New Zealand's environment and native species since 1923. We are independently funded by private subscription, donations, and bequests. Our mission is to protect and preserve New Zealand's unique ecological values, flora and fauna, and natural habitats.
2. Forest & Bird has 47 branches throughout Aotearoa New Zealand. Our North Canterbury, Ashburton and South Canterbury Branches have a long history of conservation in the Canterbury region. We have contributed significantly—and continue to contribute significantly—to conservation in the Canterbury region as advocates for the environment through national, regional, and local planning processes; through our youth network; as an educator through our Kiwi Conservation Club; and in action through on-the-ground conservation work within our communities.
3. Forest & Bird has for many years had a strong interest and involvement in freshwater and restoring nature in the Canterbury region. Our strategic vision for Canterbury which ties into our national Forest & Bird strategic objectives is as follows:

Climate Centred: Canterbury is resilient to the impacts of climate change. Activities or developments in the region must actively mitigate their contribution to climate change. People understand the threat and urgency of climate change and are supported in climate change practices.

Economy that Supports Nature: Canterbury's local economy and nature are interconnected. Unhealthy nature equals an unhealthy economy.

Vibrant Landscapes: Canterbury's terrestrial native flora and fauna are protected and enhanced in urban and rural areas. Canterbury's landscapes are free from pests. Development can occur without clearing and destroying landscapes and their respective natural ecosystems.

Oceans Alive: Canterbury people recognise the health of the marine environment is a direct result of on-land activities. The regions harbours return to their original, healthy states. Fishing and aquaculture activities follow ecosystem-based management principles. Thirty percent of Canterbury's marine environment is protected through a network of no-take marine protected areas.

Energised Water, Rivers and Wetlands: Canterbury's rivers and streams are clean, healthy and teeming with life. Wetlands are protected and enhanced.

4. We are grateful for the opportunity to provide feedback on the Long-Term Plan Te Pae Tawhiti 2021/31 and have done so beginning with some general comments then with specific comments on relevant portfolios.

General Comments

5. Forest & Bird supports Option one. Decades of poor planning and under investment in environmental protection has placed a burden on this generation. Extreme weather events, wildfire, biosecurity incursions and water borne diseases are already affecting Canterbury communities and are likely to worsen in time.
6. Urgent and bold action is now needed to avoid compounding the burden on to future generations. Business as usual is lethal and a system shift for managing the natural environment is overdue. While the proposed rates increase in Option one is significant, it would be foolish to not support this proposal, and in fact to do more.
7. Climate change response initiatives should be elevated as a priority. Climate change response priorities cut across other portfolios, so it is important that actions are integrated and complementary. We recognise and support the need for Environment Canterbury to take a leadership role to co-operate with the region's territorial authorities and ensure that climate change response initiatives especially, must be undertaken in a co-ordinated, timely and efficient way across the region.
8. Healthy freshwater ecosystems remain a high priority for Forest & Bird. Increasing nitrate pollution in Canterbury's freshwater is particularly concerning, especially where the renewal of highly polluting resource consents excludes public notification. Full public participation in water management decisions that adversely affect ecosystem health and public health is vital. There is strong support in the wider Canterbury community for Environment Canterbury to take a tougher stance on polluting activities to improve Canterbury's freshwater ecosystems, to be inclusive and transparent, and to have honest conversations with all water users.

9. Proposed Option one includes a significant general rate increase to implement the government's new "Essential Freshwater" package (among many other priorities). A general rate increase of this scale is only appropriate and fair when pollution is reduced faster, and polluters are required to pay the cost of the pollution they generate, that affects Canterbury's water ways.
10. Forest & Bird prefer stopping the uniform annual general charge (UAGC) altogether but appreciates that the council has reduced this to \$41.55 per household per year. We think a more equitable approach to collecting rates is to use the general rate tied to property value and targeted rates tied to services.

Regional and Strategic Leadership Te Hautūtanga ā-Rohe, ā-Rautaki hoki

11. In May 2019, Environment Canterbury became the first council in the country to declare a climate emergency. For this, the council is applauded. However, this does need to be supported by meaningful action otherwise declaring a climate emergency is simply hollow words. Non regulatory and regulatory systems need to be aligned to provide confidence and trust that there will be meaningful change. While no one likes regulation, it is a necessary evil to manage laggards and to drive innovation. Environment Canterbury must take the lead to progress a regulatory framework consistent with its statutory obligation and one that provides confidence, trust and certainty for all of its constituents.
12. We acknowledge that the purpose of local government is to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future. This is often seen as a "balancing" exercise. However, Forest & Bird believe the balance has been massively skewed toward economic well-being at the expense of the other three well-beings. Honest conversations and meaningful action is required to provide appropriate redress. Environment Canterbury and the region's territorial authorities are obligated as a regional leader to facilitate this.
13. Forest & Bird support the Tuia partnership with Ngāi Tahu Papatipu Rūnanga and are equally supportive of Ngāi Tahu Tumu Taio.
14. Forest & Bird support increasing engagement with young people to raise awareness and understanding of the council's work and how they too, can be part of the solutions. While we support Enviro schools, we add that there are other models of youth and young people engagement that need to be supported.
15. Forest & Bird support the proposed reviews of the Regional Policy Statement, the Regional Coastal Plan and freshwater amendments to the Canterbury Land and Water Regional Plan and would like to see this started as soon as possible.
16. We recommend allocating more funding to compliance, monitoring and enforcement and to establish a meaningful cost recovery system for recovering costs from major polluters.

Water and Land/Te Wai me Te Whenua

17. As discussed above nitrate pollution is the single biggest issue of community concern for the region's freshwater ecosystems and drinking water. Forest and Bird commends the council for

combining water and land into one portfolio, these resources cannot be managed in isolation. Addressing inappropriate land-use is critical to more quickly reducing inputs that result in nitrate lost to water and subsequent damage to ecosystems. Forest & Bird strongly support immediate plan changes that prevent renewing polluting discharge consents without public notification and to implement environmental bottom lines to comply with the National Policy Statement for Freshwater Management (NPS- FM). This is urgent. We are pleased to see funding set aside to meet statutory obligations but wonder if it is sufficient to do the job in a timely way.

18. The Canterbury Water Management Strategy (CWMS) was a good strategy for the 2010's however its priorities have been lost. The CWMS contains first order priorities, not dissimilar to Te Mana o Te Wai "hierarchy of obligations". Forest & Bird recommend that the CWMS be updated to strengthen and re-affirm its first order priorities to reflect Te Mana o Te Wai obligations and acknowledge the urgency that the dual climate and ecological emergencies present. This action will provide certainty of the direction of travel for all water users.
19. Forest & Bird does not support the continuation of zone committees or zone delivery teams. While we acknowledge that zone committees may have unified some communities on water management, in others they have been divisive to a point where they no longer have relevance or legitimacy. They are a legacy of the "old guard". The zone committees appear to continue to be "business as usual" and as a result continue to haemorrhage credibility to the extent that it is counter-productive for Environment Canterbury. While we recognise the purpose has changed and the funding has been reduced, Forest & Bird cannot support any continued funding of zone committees or zone delivery teams.
20. Forest & Bird does not support public funding of managed aquifer recharge (MAR). The cost of MAR must be borne by the makers of the problem it is trying to address. Furthermore in the interest of transparency Environment Canterbury should have disclosed in the LTP discussion document, the costs to the district should the project be discontinued, so the Ashburton community can decide for itself if it wishes to support a targeted rate for this. Forest & Bird consider MAR projects are not an efficient use of valuable clean water and are simply a band-aid solution to continue polluting.
21. Forest & Bird strongly recommends that Environment Canterbury fund monitoring of all regional Water Conservation Orders and provide annual reports to the public based on WCO conditions.
22. Forest & Bird does support grass roots inclusive participation and transparency. We appreciate that Environment Canterbury has established an "open door approach" for groups like Forest & Bird. Such dialogue has merit for expressing concerns and co-producing solutions and may provide the basis for an alternative model of engagement with the range of communities. We hope that Environment Canterbury will continue to support this approach.

Biodiversity and Biosecurity/Te Rerenga Rauropi me Te Whakahaumarau Rauropi

23. The Long-Term Plan 2018-2028 pledged a step change to the way indigenous biodiversity would be managed but this has not been translated into meaningful action or qualitative outcomes for indigenous biodiversity. Unfortunately, indigenous biodiversity in Canterbury continues to decline at an alarming rate. So much more must be done.

24. Forest & Bird strongly support more funding for indigenous biodiversity protection and restoration in the Canterbury region. We acknowledge the Jobs for Nature program that has provided additional funding for wilding conifer and wallaby eradication in Canterbury. We support the ongoing funding of the Biosecurity Advisory Groups.
25. The National Policy Statement for Indigenous Biodiversity (NPS-IB) is due to be gazetted later in 2021 and provides stronger direction for that step change. The NPS-IB policy 3.20 provides a strong directive to regional councils by the use of the word “must”.

3.20 Monitoring by regional councils

(1) Regional councils must, by working with territorial authorities, relevant agencies and tangata whenua, develop a monitoring plan for indigenous biodiversity in their regions and each of their districts.

26. Forest & Bird recommend that more funding be allocated for Environment Canterbury to adequately fulfil its role as set out in the NPS-IB 3.20. Leadership and resourcing will be vital to align regional and district councils to achieve what is required to halt the decline in Canterbury’s indigenous biodiversity as set out in the Canterbury Regional Policy Statement (CRPS).
27. The Biodiversity Strategy for the Canterbury Region does not require revitalisation. Waiting three years for a revitalisation process to finish before implementation starts is inappropriate and there is not time. There is enough existing policy direction, the effort must now be in on ground effort. Resourcing the existing strategy’s implementation immediately will be money much better spent. The priorities set out in the strategy are still valid if not more urgent, in 2021 as they were in 2008 when the strategy was adopted by the parties. They are:

Guiding Priority Principle

Focus first on protecting and maintaining what remains, and then on restoring what has been lost.¹

Priority Areas for Action

- *Threatened Environments:*
 - *environments where less than 20% indigenous cover remains.*
 - *environments where there are low levels of protection coupled with increasing threats to remaining indigenous habitats and ecosystems.*
- *Habitats and ecosystems that are naturally rare or distinctive.*
- *Habitats and ecosystems that support rare and threatened species.²*

28. Rather than fund a revitalisation process of the regional strategy and considering the imminent gazettal of the NPS-IB, a better outcome for the region’s indigenous biodiversity would be to use the funding for a region wide Significant Natural Area (SNA) survey in partnership with territorial authorities.
29. Currently SNA surveys occur in an adhoc way throughout Canterbury’s districts. Maintenance of SNA also occurs in a haphazard way. Undertaking a region wide SNA survey to establish a clear

¹ Biodiversity Strategy for the Canterbury Region p26

² Biodiversity Strategy for the Canterbury Region p27

baseline is vital to establishing a monitoring program for the region's indigenous biodiversity. Forest & Bird strongly recommend more funding be set aside for region wide SNA surveys to assist the territorial authorities achieve their Resource Management Act obligations to protect significant and maintain indigenous biodiversity.

30. Similarly the Aotearoa New Zealand Biodiversity Strategy (ABNZS) contains a strategic priority called "*getting the system right*". The ABNZS is a cross sector strategy. Programs that promote joined up thinking across government agencies, non-government organisations, communities and industry with shared priorities for halting the decline and restoring indigenous biodiversity need to be well resourced at both the policy level and the practical level.
31. The lack of detail on commitment to initiatives like the Mackenzie Basin Agency Alignment Program³ and the complete omission of reference to the Braided Rivers Action Group in the LTP is disheartening. Given the considerable investment of time and effort, especially for the BRAG by environmental NGOs like Forest & Bird, this is disappointing. These models are vital to getting the system right, breaking down silos and to achieving biodiversity outcomes across boundaries and jurisdictions. Forest & Bird would prefer to see these initiatives funded rather than the water zone committees. We expect the LTP will be amended to continue funding these types of initiatives.
32. Forest & Bird is concerned that there a disconnect between biosecurity and indigenous biodiversity protection. Unauthorised indigenous vegetation clearance is often conflated by land-occupiers with meeting Canterbury Regional Pest Management Plan requirements. Forest & Bird recommends more funding be allocated to education for land occupiers and biosecurity practitioners to remedy this unfortunate situation.
33. Forest & Bird recommend a partial review of the Canterbury Regional Pest Management Plan (CRPMP). This is necessary to elevate the status of wallaby from containment to eradication and to be consistent with the National Wallaby Eradication Strategy. We also recommend upgrading the status of feral cats and Canadian geese from "organisms of interest" to "pest". Black backed gulls are an increasing threat to smaller braided river birds like wrybill plovers and banded dotterels. We recommend that black backed gulls be included as a "pest". We recommend feral cats be controlled under an eradication program and Canadian geese and black backed gulls as progressive containment. Plant species such as Lupin's generally (as well as Wild Russell Lupin) should be included as a pest species.
34. Given there is likely to be a review of the Biosecurity Act in the near future and there are likely more biosecurity issues that crop up in the near future, funding a partial review of the CRPMP should be included in the LTP. Forest & Bird also recommend increasing funding for deer, pig and goat control on Environment Canterbury Council administered land.
35. Plant pest in riverbeds smother braided river bird habitat and destroy natural character. While we strongly support protecting priority habitats like wetlands, we recommend going beyond that to include restoration of more braided riverbed habitats.

³ [Home - Mackenzie Basin Agency Alignment Programme](#)

36. Forest & Bird support the braided river revival Whakahaumarū Ngā Awa ā Pākihi project. We have reservations over the balance between hard engineering solutions to protect infrastructure (private and public) and the genuine commitment to exploring and implementing appropriate nature-based solutions to restoring braided river habitat. For example we caution against a hasty response to Rangitāta flood recovery that could undermine future opportunities to restore natural character and habitat for native species. Forest & Bird recommends that Environment Canterbury investigate the work of Henk Ovink (Special Envoy for International Water Affairs of The Netherlands) for potential nature-based solutions to assist Rangitāta flood recovery planning. Forest & Bird would welcome an invite to be involved in that process.
37. Forest & Bird support Me Uru Rākau where it prioritises the protection and restoration of existing indigenous vegetation, including increased pest control to prevent ecosystem collapse. Then focus on planting and restoration planting where appropriate This is consistent with the Canterbury Biodiversity Strategy priorities and it also provides an opportunity to gather data for SNA surveys.

Climate Change and Community Resilience / Te Whakamahanatanga o Te Ao me Te Aumangea te Hapori

38. As discussed above Forest & Bird recommends elevating the climate change and community resilience portfolio to an overarching portfolio that guides all other work streams. The priorities in other portfolios will be driven by what is needed to make Canterbury communities more climate change resilient.
39. Forest & Bird is afraid that not enough is being done by agencies of the government to address the climate emergency. We strongly recommend resourcing and developing a regional climate change strategy that sets out priorities, targets and milestones that integrate and guide priorities in other portfolios.
40. Climate change will impact on freshwater, land-use, the coastal environment, the ocean, biosecurity and indigenous biodiversity, how and where people live and move around the region and the island, so it is important that priorities in all portfolios are viewed through a climate change lens.
41. Forest & Bird strongly support Environment Canterbury's modelling of historic landfills.⁴ Forest & Bird recommends that funding be allocated for the short to medium term removal of the most at-risk landfills. The experience at Fox Glacier in March 2019 indicates that removal of an at-risk landfill before an extreme weather event is a more efficient solution than after the landfill erupts.
42. Transport (active and public) solutions including fit for the long-term future electrification of mass rapid transit needs to be guided by climate change adaptation milestones and targets. Likewise all future land-use will be guided by climate change targets.

⁴ [More than 300 old dumps at risk of coastal erosion and flooding | Stuff.co.nz](https://www.stuff.co.nz/news/344444444)

Air Quality, Transport, and Urban Development/ Te Pai o Te Hau Takiwā, Ngā Momo Waka, me Te Whanaketanga o Ngā Tāone

43. As discussed above any climate change strategy will drive air quality, transport and urban development priorities. Forest & Bird support accessible, well connected, active and public transport solutions. Utilising existing infrastructure including the rail network and electrification does not appear to have been considered in the LTP. We recommend the council factor investigation into the electrification of existing rail network as a future mass rapid transit option between centres like Darfield, Rolleston, Ashburton, Timaru, Rangiora and Christchurch. Connecting Canterbury with neighbouring regions by rail for passenger and freight must be a part of the climate adaptation strategy. Continued electrification of and improvement to the public bus fleet and services will be vital for meeting zero carbon milestones in the short term.
44. Stubble burning is an outdated practice that was banned in other developed countries decades ago. Forest & Bird strongly recommend that Environment Canterbury ban stubble burning for both environmental and public health reasons. In our view, it certainly does not constitute “good management practice”. Regulation that prohibits stubble burning is consistent with improving air quality and public health outcomes and needs to be part of a climate resilience strategy that incentivises more regenerative farming practices.
45. Forest & Bird supports increased funding of regional civil defence and emergency services as wildfire and extreme weather events are likely to increase in magnitude over time.

Concluding thoughts

Dealing with the climate and ecological crisis and Canterbury’s woeful nitrate problem requires bold leadership and urgent action from Environment Canterbury during the next decade. Forest & Bird strongly urges the council to heed this urgency and do much more than they are proposing in this generation Long-Term Plan. You will find there is considerable community support for this type of leadership. Ocean acidification and loss of native marine species presents an alarming picture of future, we look forward to participating in the process to review the Coastal Plan for the Canterbury region and more enduring protection for the coastal and marine environment and the native species that live there.

Thank you for the opportunity to provide feedback.

Nicky Snoyink
Regional Manager
Royal Forest and Bird Protection Society of New Zealand Incorporated.

n.snoyink@forestandbird.org.nz