

Submission by the South Canterbury Chamber of Commerce



to the

Ministry for the Environment

on the

**Action for healthy waterways – A discussion document on national direction
for our essential freshwater**

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Submission**Background and overview**

The SCCC is a membership-based organisation representing over 520 businesses across South Canterbury including large organisations such as Fonterra Clandeboye, through to sole traders. It is an affiliated member of the New Zealand Chambers of Commerce Incorporated, which is a national body representing the 28+ Chambers of New Zealand, which collectively represent over 22,000 businesses.

The SCCC has served South Canterbury businesses for 113 years and its purpose is to achieve “Better Business Outcomes” which in turn supports the whole South Canterbury community. It is a recognised and respected business services organisation for South Canterbury and the voice of the local business community.

The SCCC is cognisant of the diversity of its membership and, as such, the potential diversity of views on the national Policy Statement (NPS) and the Action for Healthy Waterways. The SCCC respects that diversity and has encouraged its members to consider and submit individually on matters that specifically affect their business interests and aspirations.

The SCCC has, therefore, confined its own submission on the NPS to higher level matters, including in particular:

- supporting the Government’s intent to improve water quality
- setting standards at an appropriate level and enabling sufficient time for adaptive management practices to be implemented
- factoring into the policy making the very real impact this will have on the agricultural sector and all those communities dependent upon strong agricultural performances
- upholding property rights to encourage investment

The Government has outlined 3 objectives:

1. **Stop further degradation** of New Zealand's freshwater resources and start making immediate improvements so that water quality is materially improving within five years.
2. **Reverse past damage** to bring New Zealand's freshwater resources, waterways and ecosystems to a healthy state within a generation.
3. **Address water allocation issues** having regard to all interests including Māori and existing and potential new users.

The package of proposals addresses the first two objectives; the third objective, water allocation, continues to be worked on.

It is stated in the NPS that regulations would require different actions in different regions and catchments but in general would mean:

- better management of stormwater and wastewater
- no further loss of wetlands and streams
- tighter controls to prevent sediment loss from earthworks and urban development
- farmers and growers understanding and managing environmental risks and following good practice
- new standards and limits on some farming activities in some regions or catchments.

SCCC notes the 2018 General Social Survey identified the state of rivers, lakes, streams, wetland and aquatic life as a concern for 80 percent of New Zealanders. It is also noted that there was little difference between the views of people in rural areas and those in urban areas.

SCCC strongly supports the Government's intent to improve water quality, however it is also important to understand and identify how this will affect communities and what trade-offs will be needed. The timeframe for any change in land use practices is also a critical factor that needs to be taken into account.

Proposed changes may interfere with current established property rights and if they do, either compensation must be paid, or adequate time provided for adjustments to be made. The changes will potentially have a major impact on future land and property investment with an associated reduction in investor confidence.

Freshwater is essential to life and highly valued from an economic, cultural and social perspective. It is relied upon for environmental sustainability, manufacturing and export production, tourism, hydro-electricity generation and recreational activities. Water is key to the country's future economic growth.

Water quality standards must be set at appropriate levels. If standards are too high the cost could be limiting and prohibitive affecting output and value from water use. If

standards are too low this will result in environmental damage and cultural and recreational use would be negatively impacted.

Another point perhaps worthy of consideration is how this will be supported/funded. There will be a cost impact for regions particularly around storm water and trade waste – will this supported by central government or will regions and businesses have to look after themselves. In which case we will need to understand the economic impact and have time to prepare and mitigate this.

The impact of the proposed changes would also be likely to have a major effect on agricultural production with timeframes too tight for adaptive practices to be implemented. With agricultural debt levels now built up to \$63 billion any significant land use changes could lead to financial fall-out in the agricultural/dairy sector and rural New Zealand. The very real impact on economic growth needs to be factored into decision making. This is of particular concern to regional New Zealand where agricultural production, food and related manufacturing and processing with all the associated support industries are literally the life blood of our communities.