

Healthy Rivers Allocation (Future - Policy 7; and alternative allocation regimes)

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Deletion of Policy 7

- Agree with S42A report – prediction of suitable mechanisms for future is challenging, central govt initiatives, tangata whenua interests in water. Future planning regime needs to make assessments without pre-judgement
- Other submitters - **Value in knowing longer term direction** – agree, and this is what V&S gives, and 80-year objectives, not needed in 7
- Support collection of information and undertaking research – Methods. But need more than science – also need framework based on common language of resource use and care, including Maori relationship and decision-making frameworks and values

Alternative allocation regimes – land suitability (PC1)

- Land suitability as per PC1, not well defined, increases uncertainty
- No assessment of it presented to CSG, and not included in recent evaluations of alternative allocation approaches. Don't know what it is or how to evaluate it.
- Land suitability criteria in PC1 do not align with those developed by the NSC – which includes economic, environmental, social and cultural values within the feedback loops, and the receiving environments, and interventions that can enhance resilience. PC1 – excludes all of this. NSC approach, through its inclusion of these things, has potential as it allows an integrated and flexible approach, but complex and many models, compounding errors and black-box uncertainty
- Oppose Policy 7a and the footnote

Alternative allocation regimes - Natural Capital and Land Use Capability

- Oppose the inclusion of alternative allocation frameworks (in Stage 1) - DoC, Beef+Lamb, etc.
- LUC not a proxy for natural capital (recent); developed 1950s onward to characterise existing and potential production, given limitations (erosion – Soil Conservation and Rivers Control Act 1941)
- Not a proxy for N loss either – compounds inaccuracies; does not consider receiving environments and their proximity, no clear link to N, and uncertain assignation of discharge allowances
- Also, other parties' focus on LUC for N – but 4 contaminants, N the least linked to LUC. Other 3 contaminants would be ok to have LUC as a proxy – geology, slope, erosion type
- Other criticisms of LUC approach – FFNZ; **NZARES paper on Natural Capital allocation**