

24 April 2020

Hon David Parker  
Minister for the Environment  
By email to: [d.parker@ministers.govt.nz](mailto:d.parker@ministers.govt.nz)

Hon Damien O'Connor  
Minister of Agriculture  
By email to: [d.o'connor@ministers.govt.nz](mailto:d.o'connor@ministers.govt.nz)

Dear Ministers Parker and O'Connor

## Implementation of Essential Freshwater package

The Canterbury Mayoral Forum supports the goals of the Essential Freshwater package. We do not think the reforms should be de-railed by the COVID-19 crisis.

Canterbury region has been hit hard by the loss of international tourism and international education. The mainstay of our regional economy is the primary sector and food manufacturing. We want to work with you to improve our freshwater management in ways that also contribute to and do not undermine job creation and economic recovery. But neither do we want economic recovery to come at the expense of further degradation of our natural environment.

In this, we largely endorse the letter you will have received from Local Government New Zealand's Regional Sector Water Sub-group.

The 10 territorial authorities in Canterbury and the regional council are working together on regional recovery. We can only achieve this through collaboration, because individually we are each having to revisit our Annual Plans and budgets for 2020/21 and our Long-Term Plans for 2021–31. We are assuming pressure on rates and reduced non-rates income from, for example, consenting fees and charges, development and financial contributions, dividends and investment income and closure of community facilities during the lockdown.

In light of our changed context, we recommend that the Government:

- proceed with the proposed NESFW and stock exclusion regulations – and lower transaction costs, particularly for local authorities as environmental regulators
- phase implementation, prioritising in the first instance catchments that are most at risk

### *Mayors standing together for Canterbury.*

Secretariat, E: [secretariat@canterburymayors.org.nz](mailto:secretariat@canterburymayors.org.nz) W: [www.canterburymayors.org.nz](http://www.canterburymayors.org.nz)  
C/- Environment Canterbury, PO Box 345, Christchurch 8140 T: 03 345 9323

- allow councils to continue progressing existing freshwater plans without having to re-visit these – and encourage those councils to accelerate work to contribute to economic recovery
- apply limits for Dissolved Inorganic Nitrogen and Dissolved Reactive Phosphorus only to catchments where there is strong evidence that they are material drivers of ecosystem health and where, therefore, regulation will yield a measurable benefit
- work with the local government sector to phase and prioritise the proposed monitoring programme, focusing on the measurement of attributes that will make the greatest difference to the health of specific waterways / waterbodies
- support us to keep improving water quality through non-regulatory means that also contribute to economic recovery – for example, our work in riparian planting and stock exclusion, tree planting for erosion control, pest control and developing and enhancing wetlands. Environment Canterbury is working with partner agencies to identify a package of green initiatives with potential to create work, including for relatively low-skilled workers.

We want to come out of the COVID-19 crisis stronger and healthier as a region – environmentally, economically, socially and culturally. This will only happen if we all work together to make a difference in local contexts.

As the primary mechanism for local government collaboration in New Zealand's largest region, the Canterbury Mayoral Forum offers its support and is keen to work with you to progress the freshwater reforms in ways that will also support regional recovery.

Yours sincerely



Sam Broughton  
Chair, Canterbury Mayoral Forum



Jenny Hughey  
Chair, Environment Canterbury