



## **WAI Wānaka's Submission to the Proposed Otago Regional Policy Statement, June 2021**

### **Introduction**

This submission focuses on the Land and Freshwater domain in the Otago Upper Lakes rohe. WAI Wānaka supports the intent of the policy statement and encourages the Council to implement and refine the policies quickly and enthusiastically into effective action plans.

As set out in the "Purpose" the Proposed Otago Regional Policy Statement (PORPS) provides a policy framework that responds to identified significant regional values and resource management issues relating to Otago's environment, economy, recreational opportunities and communities. The PORPS states (p9) that: "The purpose of the RPS, as set out in Section 59 of the RMA, is to provide an overview of the specific resource management issues for the region and establish policies and methods to achieve the integrated management of both the *natural and physical resources* of the region". WAI Wānaka is concerned that while ORC may have broadly met this legal requirement in documenting previous RPSs, effective plans for the evidence-based management of the ecosystems of the three deepwater lakes and their catchments in the Otago Upper Lakes rohe have not been derived and implemented.

WAI Wānaka would like to see the policy statement, as it pertains to Land and Freshwater and particularly the region's deepwater lakes of the Upper Lakes rohe, being translated into a comprehensive management plan to protect and enhance lakes Wānaka, Hāwea and Whakatipu. There are several aspects of the PORPS which we consider may require further discussion and would appreciate an opportunity to meet with ORC staff to discuss these before the PORPS is finalised.

Together these lakes and their associated catchments represent a significant part of the region's natural capital. The communities and businesses that have developed around these lakes also make an important contribution to the region's economic output. In fact, the economic, social and cultural wellbeing of the communities living beside and enjoying the Otago deepwater lakes is entirely dependent on the lakes remaining in a pristine state. We contend that this will not happen in the absence of evidence-based management of the lakes. We do not see in the PORPS an intent by ORC to raise the level of monitoring and research supporting active management, or the development of a stakeholder/community engagement process that would assess existing information, recommend new research and monitoring, to support management actions and policy review with respect to the Region's deepwater lakes.

## The primacy of the environment

An important concept underpinning the PORPS is the primacy of the environment: The management of natural resources in Otago, by and for the people, including Kāi Tahu, achieves healthy, resilient, and protected natural systems, and the ecosystem services they offer, and supports the well-being of present and future generations, *mō tātou, ā, mō kā uri ā muri ake nei*. Further, the PORPS notes that “Unless expressly stated otherwise, all decision making under this RPS shall firstly, secure the long-term life-supporting capacity and mauri of the natural environment”.

WAI Wānaka strongly supports these policy statements.

On the face of it the deepwater lakes appear pristine and their catchments largely unspoilt. However, for the past 150 years the steady increase in human activity in the Upper Clutha and Whakatipu catchments has put pressure on ecosystems. With the exception of sewage and wastewater treatment (after the 1950s), the run-off from urban and rural development, both directly through rivers and streams, through draining slopes and indirectly via passage through soil and gravel, has flowed into our lakes and aquifers.

The PORPS states (p82): “Lake Wānaka, Lake Hāwea, and Lake Wakatipu, [...] all have good *water* quality which equates to the “A” band (being top/best level) for the *National Objectives Framework*”. This assertion is misleading. For these lakes it is based on very few samples of three attributes (chlorophyll, nitrate and phosphate) for each lake; samples that have been taken well away from the shore near the surface over mid-lake deep water and cannot provide a reliable basis to state that these lakes “all have good water quality”.

Lakes Wānaka, Hāwea and Whakatipu each face similar environmental threats and lack of understanding of key attributes and processes. The absence of evidence-based management puts all three lakes at risk of accumulating nutrients, sediment, emerging organic compounds, other toxins, and pathogens from decades of expanding human development in their catchments and also of establishment of new invasive pest plants and animals. It is highly likely that these changes have adversely affected the lakes’ ecological health. The recent detection for the first time in Lake Hāwea of the highly invasive Canadian Pondweed (*Elodea canadensis*) and the absence of a control plan is of concern. Ecosystem changes such as the decline of longfin eel populations should not be permitted to continue. Such risks, and actual damage to these three very important Otago lakes should be addressed with priority by ORC in its Regional Plans.

In the PORPS, IM–P13 (managing cumulative effects) states that “Otago’s environmental integrity, form, function, and resilience, and opportunities for future generations, are

protected by recognising and specifically managing the cumulative effects of activities on natural and physical resources in plans and explicitly accounting for these effects in other resource management decisions.” IM-M1 (4) (p99) sets out responsibilities for regional and district plans to manage cumulative effects. We strongly support the intent of these policy statements and are keen to see them translated into actions.

SRMR– 2 (p67) states that “Climate change is likely to impact our economy and environment” and there are many other references throughout the document to climate change. However, the PORPS does not mention or acknowledge the Government’s Climate Emergency declared in December 2020. This declaration will likely have an impact on how ORC conducts many of its activities and implements its regional plans and should therefore feature in the document.

### **Lakes Management Plan**

WAI Wānaka is keen to work with others, and especially ORC, to develop a comprehensive management plan for protecting and enhancing the ecosystem health of Otago’s deepwater lakes.

Such a plan would include a formal process within which stakeholders agree on effective and efficient actions to understand, protect and enhance the ecological health of these crucial natural assets. Indeed, we argue that a key rationale for the policies set out in the PORPS is to direct actions in pursuit of desired outcomes.

We acknowledge that the Council is in the early stages of developing a lakes strategy for the region and appreciate that consultation with WAI Wānaka has begun. We are keen to contribute to the development of this strategy and believe we have some important components of the strategy already articulated for lakes Wānaka, Whakatipu and Hāwea.

WAI Wānaka supports the following actions in pursuit of effective and efficient management of the region’s deepwater lakes:

- Establish a formal lakes management decision-making process with stakeholders to guide future research, monitoring and lakes’ management actions.
- Increase understanding of lakes’ ecosystems and hydrodynamic processes, water quality monitoring including buoys, deepwater sampling and remote sensing of surface water.
- Build on existing data from ORC’s NPS-FM required attribute sampling to address key questions about the lakes’ ecosystems and processes.

- Support a substantial bid for a six-year MBIE funded Otago deepwater lakes research project to match the scale of the research questions necessary for evidence-based management for the three lakes environments.
- Align the research needs of the Otago Upper Lakes rohe and requirements of freshwater environmental policy documents from the Ministry for the Environment, with Ministry for Primary Industry and Kai Tahu freshwater aspirations.
- Use WAI Wānaka’s deepwater lakes strategy and Community Catchment Plan as templates for all three deepwater lakes
- Enhance preparedness for modelling and managing effects of climate change on the lakes’ hydrodynamics and health.
- Increase public awareness, understanding and engagement in the challenges to the health of Otago deepwater lakes by bringing experts to present to public meetings and school groups.

We note under “Natural features and landscapes” NFL-P5 that the PORPS has a specific policy for managing wilding conifers. We support this policy but make two important observations. Firstly, the cumulative adverse effects of wilding conifers have been obvious for several decades. An earlier response to this problem would have meant a quicker and materially less expensive solution. The lesson must be to act sooner and more aggressively to address threats to the environment. Secondly, wilding conifers are an obvious problem – people can see them spreading across the landscape. In contrast, the effects of aquatic pest plants, increasing nutrient loads and general contamination of our deepwater lakes are much less observable but no less devastating for the environment in the medium to long term. Like climate change, it is difficult to generate a concerted response to something that is not obvious. This highlights the importance of providing data and research on environmental threats and just as crucially communicating them clearly and forcefully to individuals, communities, businesses, farmers, etc.

LF-FW-P11 to P15 (p131) are all relevant to developing a lakes’ management plan.

In section LF-PW-P11, that identifies Otago’s outstanding water bodies, item 1 states that this includes: (1) the Kawarau River and tributaries described in the Water Conservation (Kawarau) Order 1997. We agree that it is important to include this, but we recommend adding the following: This Water Conservation Order also includes Lake Whakatipu and most of its tributaries. (We suggest this because it is a significant but barely visible and

easily overlooked part of this Water Conservation Order and which we believe should be clearly acknowledged when referring to the Water Conservation (Kawarau) Order 1997).

We also strongly urge that ORC explicitly include Lake Hāwea in section LF-PW-P11. There is no basis to exclude it and it is not clear that Lake Hāwea would be named as a result of ORC applying NFL-P1 (p182), APP1 (p202) or APP9 (p216). It is time to formally designate Lake Hāwea as an outstanding water body, consistent with LF-PW-P11 (3) and (4). Lake Hāwea would be an almost perfect match for the values and attributes criteria in APP1 and APP9.

LF-FW-P13 Preserving natural character (6, p132) refers to “preventing the impounding or control of the level of Lake Wānaka”. We suggest this either be replaced with – or add, “Complying with the requirements of the Lake Wānaka Preservation Act (1973)”

We note and support IM-M2 – Relationships, especially (3) “consult with Otago’s communities to ensure policy frameworks adequately respond to the diverse facets of environmental, social, cultural, and economic well-being”. We suggest the word “consult” be changed to “collaborate”. This would help encourage partnerships with communities that would better identify relevant values, but more importantly encourage the changes that will be required to meet the many challenges to our environment and quality of life.

On p199, the document states: “The [Regional Monitoring Strategy] RMS will assist ORC with expanding its monitoring activities to respond to ORPS provisions and ensure the things measured accurately reflect policy success...”. This implies that the primary purpose of evaluation and monitoring is to identify the success of policies set out in the PORPS. We suggest a more balanced statement is required to include accurately and quickly monitoring and evaluating policy failures so that changes are made, and crucial lessons learned.

A final point: There is frequent reference to biodiversity and its restoration/protection throughout the PORPS. A significant risk to our ability to manage indigenous biodiversity is our incomplete knowledge of the flora and fauna of NZ, particularly for those very numerous organisms at the smaller end of the size range (i.e. <5mm). There are likely to be many thousands of undescribed species threatened with, or driven to extinction by the impacts of our land use, pesticides, pest species, climate change and our other environmentally harmful activities before we complete research that demonstrates that these species exist, and before we describe them and name them. This implies that the estimate stated (p79) of “Almost 4,000 native species are currently threatened with, or at risk of, extinction, will be a gross underestimate of the actual number of native species at risk. No mention is made in the PORPS of the draft National Policy Statement for Indigenous Biodiversity – a significant document still in the consultation phase. This document will have



a significant influence on the steps involved in turning the PORPS into actions that translate to meaningful protection/enhancement of biodiversity.

### **WAI Wānaka**

WAI Wānaka's purpose is to protect and enhance ecosystem health and community wellbeing in one of the Region's most important and sensitive environments - the catchments of the Upper Lakes rohe. We connect the many individuals, community groups, iwi, landowners and businesses undertaking positive work towards building healthy ecosystems and supporting community wellbeing in our region. Taking a whole-of-basin approach, we encourage and facilitate science (including planning, research and monitoring), community action and educational projects and programmes to aid management action.