

RPS

From: Environmental Justice Ōtepoti <environmentaljusticeotepoti@gmail.com>
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Subject: RPS submission
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Follow Up Flag: Follow up
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Tēnā koe,

I hope this email finds you well, we had submitted on the RPS consultation review online to ORC but omitted to include any contact details:

environmentaljusticeotepoti@gmail.com

contact number: Jack Brazil 0272017820

Address 1 Vogel St Ōtepoti

Ngā mihi,

Jack Brazil

Environmental Justice Ōtepoti

Environmental Justice Ōtepoti

This is a submission on the Proposed Otago Regional Policy Statement 2021.

We are a not-for-profit community group based in Ōtepoti that is working towards environmental solutions where justice and equity are at the core. We acknowledge Kāi tahu, Kāti Māmoe and Waitaha as manawhenua of this rohe we live on.

Industrialised agriculture - the process of turning fossil fuels into food - has increasingly commodified the whenua and committed irreparable harm to the mauri of the soil, air, water & all animals who reside here. Carving up the land into fictitious borders and creating isolated farming systems within, has disconnected the lived realities of the biosphere and anthropogenic agricultural systems.

A 2019 report by [Environment Aotearoa](#) showed decades of denial has led to irreparable harm to the living systems in Aotearoa necessary for sustaining life. It was found that in Aotearoa we are now considered one of the most invaded countries in the world (biologically) with 75 animal and plant species genocided to extinction since colonial settlement. Particularly the once vibrant bird life that has fallen victim to industrialised agriculture, forestry and invasive pest species. One only needs to look at the land from above to see the extreme loss of indigenous forest systems, wetlands and other unique biospheres that once held many unique living systems and sequestered carbon through their life cycles.

We would like to acknowledge the importance for restitution for stolen wealth following the edifice of extractive industries having committed grave ecocide. Acknowledging that economic prosperity and wealth has been & is still being built upon stolen land fertilised by stolen phosphate from indigenous peoples; presently from Western Sahara, and historically from Nauru, Kiribati, Banabas, and so called Australia. This whakapapa is intrinsically connected to the material reality of harm to freshwater systems in Aotearoa.

We would like to acknowledge that over the past 30 years this regional council has failed and is still failing to address the health of waterways and in fact have enabled private commercial infrastructure to become even more reliant on indefinite water usage despite knowing for these 3 decades that we need to be working with the land rather than treating it as a source of infinite extraction. We acknowledge that this statement is making some pathways to repairing this harm that will take generations to regenerate.

We would like to acknowledge that artificial fertilisers and superphosphates have been sterilising the land and water systems, creating a co-dependent relationship that degrades the ability of the land to regenerate, thus creating dependence on a false model of infinite extraction that is predicated on ongoing colonisation and imperial occupation of indigenous lands.

We would like to call on this Council to commit to no more contradictory colonial fictions, acknowledging the whakapapa of the problems present, the people who are currently benefiting from these harmful systems, and the history of this land and the people who have been marginalised from culturally existing in the indigenous lands.

We would like this Council to acknowledge and commit to consulting with communities, beginning early and in wide ranging ways through multiple channels. Knowing that this is an ongoing process that must be reflexive and collaborative; the notion of partnership not merely consultation.

We would like this Council to acknowledge the contextual urgency of the situation: climate crisis is threatening huge biodiversity loss & species extinction - the solution is restoration, not continuing along with destructive tendencies. We must urgently protect what little fresh water living systems remain from future irreparable harm that takes generations to heal and begin to heal the many systems that have been ecocided.

We would like this Council to acknowledge true justice/solutions are created through acknowledgement of intersectionality which reflects our integral relationship with the whenua, not compartmentalisation.

Waste:

HAZ-CL-M9 – Other incentives and mechanisms

Change to implement a zero waste management hierarchy model of waste management and update the strategy to reflect this by promoting circular systems including resource recovery and reuse over recycling.

Mitigate all environmental harm from landfill sites by recovering and mining resources previously stored that are viable for recovery.

Enabling resource recovery at a larger scale by assisting with land development for and making the process for consents for large scale composting land a viable and practicable process.

Avoid the creation of new *contaminated land*. There is no and/or to this sentence there's just a full stop.

Collaborate with other councils and regions on zero waste management systems for the lower south Island to enable circular systems to be in operation. Work with national standardisation of waste.

Regarding the Regional Policy Statement we would like to support and centre these statements:

We tautoko the Mana whenua engagement to date we particularly support the following as places to start working on change and collaboration with mana whenua:

The Kāi Tahu perspective recognises that species within ecosystems are connected, and **effects** on one species will be felt throughout the rest of the system. **Effects** on mahika kai and taoka species diversity and abundance affect the relationship of Kāi Tahu with these species. Whānau are unable to access traditional mahika kai and taoka species and places because in many cases they no longer exist, or no longer provide resources that were once abundant there.

Specific concerns include:

- Degradation of mahika kai due to the impacts of contaminants from both point and non-point source **discharges**, including human **waste** disposal to mahika kai areas.
- The **effects** of soil contamination from poorly managed landfills, industrial sites and **waste** disposal sites.
- Continued urban spread encroaching on mahika kai sites.
- Genetic modification of indigenous flora and fauna, which represents deliberate alteration of whakapapa.
- The impact on mahika kai and indigenous **biodiversity** from weed and pest invasion.
- Loss of indigenous fish species, many of which are taoka and mahika kai, through displacement and predation.
- Loss of indigenous flora and fauna remnants and lack of co-ordinated management of habitat corridors.
- Impacts on mahika kai and aquatic ecosystems from a lack of effective catchment-wide riparian management.
- Loss of recruitment of indigenous flora in remnant bush areas due to continuous stock grazing.
- The impact of inappropriate forestry developments, conversion of tussock lands and other intensification of farming on indigenous flora and fauna values, including ecological disturbance and displacement of species.

In Otago there are separate plans for **freshwater** and the coastal area and they are not consistent with each other. These divisions in the management of the **environment** fail to recognise that all **water**, in **rivers**, underground, in the air and in the ocean is connected, and what occurs in the headwaters and on **land** will have an impact in the ocean.

Specific concerns related to RMIA-WAI-I1 to RMIA-WAI-I5 are interrelated, and include:

- **Water** quality concerns:

- Deterioration in *water* quality resulting from poor *land* management practices.
- The cultural and *water* quality impacts of point and non-point source *discharge* of human *waste* and other *contaminants* to *water*. Whānau cannot gather kai from places where human *waste* (whether treated or not) has been *discharged*, or where herbicides and pesticides have been used. Reliance on dilution rates to mitigate the *effects* of *discharges* is culturally inappropriate.
- The *water* quality impacts of *discharges* from mining activities.
- *Water* allocation concerns:
 - Kāi Tahu consider that many of the waterways in the region are *over-allocated* from a cultural perspective.
 - Abstractions of greater volumes of *water* than are required, lack of *water* harvesting and continuation of inefficient methods of *water* use.
 - The implications of increased *water* demand for domestic use which will put additional pressure on the already scarce *water* resource.
 - The *effects* of long durations for *water* take consents which lock in a pattern of resource *use* for a long time, limiting the ability for Kāi Tahu to exercise *kaitiakitaka* responsibilities.
 - The impact of cross mixing of *water* from different catchments on the distinctive mauri of the *water bodies*.
 - The lack of understanding of the interactions between *groundwater* and surface *water*.
- Concerns about channel modification and *river* works:
 - The *effects* of damming on disruption of natural flow patterns, loss of *freshwater* habitats and migration of indigenous fish species.
 - The *effects* on the mauri of the *water body* from diversion of watercourses upstream and downstream of mines.
 - Impacts of activities such as channel maintenance and channel cleaning on *water* quality and on disruption of species living in the channel and their habitat.
 - Impacts of channel reshaping, in particular straightening, on *river* flow and habitats, and the mauri of the *water body*.
 - The *effects* of *bed* disturbance, including suction dredging and gravel extraction, on stream morphology and habitats.
 - Impacts of willow removal on *water* quality, *water* temperature and mahika kai habitat.

- Introduction of exotic weeds through poorly cleaned machinery, and the subsequent impact on bank habitat and *water* ecosystems.
- The *effects* of changes in vegetation cover, including clearance of *indigenous vegetation* and exotic *afforestation* on the *water* retention capacity of *land* and consequent flow patterns, which can negatively affect mahika kai and taoka species through a reduction in their habitat

We would also like to acknowledge and support the calls from Greenpeace Aotearoa below:

We all rely on fresh, clean water for our survival. I call on you to prioritise the health of ecosystems, people and animals across Otago when adopting your Regional Policy Statement on freshwater.

I want to see an Otago where rivers run clear and clean, native plants and animals thrive alongside waterways, and drinking water is safe. The Regional Policy Statement must keep the health of water at its core so it can inform strong plans to clean up and protect water, and create a safe climate for all.

The National Policy Statement on freshwater says te mana o te wai must be preserved - that means that rivers, lakes, streams, wetlands and drinking water must be protected.

We know intensive dairying is a key driver of water and climate pollution. If we want rivers, lakes and drinking water to be healthy for generations to come, we need to tackle sources of pollution - like intensive dairying.

I am calling on the Otago Regional Council to:

- Put te mana o te wai first, so that all other objectives in the Regional Policy Statement are informed by the priority to care for water and keep it healthy
- Commit to phasing out synthetic nitrogen fertiliser and lowering cow stocking rates - two things that are incompatible with protecting te mana o te wai

- Tackle the climate crisis by lowering cow stocking rates and phasing out synthetic nitrogen fertiliser.
- Consider cumulative effects of pollution such as intensive dairying and too much synthetic nitrogen fertiliser, rather than simply in each individual catchment. What happens upstream affects people, plants and animals downstream.
- Act according to the national plan, which identifies limits based on environmental impacts. In order to do this, councils must phase out synthetic nitrogen fertiliser.
- Apply the precautionary principle to freshwater management. Intensive dairying and synthetic nitrogen fertiliser have long-term effects on water, climate and human health. With emerging research showing links between nitrate contamination from intensive dairying in drinking water and health effects like bowel cancer, the Council must act now to protect the health of our communities.
- Invest in regenerative organic farming that works with nature, not against it, to help mitigate the climate crisis and prevent water degradation.

We would like an opportunity to speak and be heard.

Ngā manaakitanga,

Environmental Justice Ōtepoti