SUBMISSION ON: SOUTHLAND WATER AND LAND PLAN

To: Southland Water and Land Plan
   Environment Southland
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Details of Submitter: The Southern District Health Board

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Introduction

Southern District Health Board (Southern DHB) presents this submission through its public health service, Public Health South. This Service is the principal source of expert advice within Southern DHB regarding matters concerning Public Health. Southern DHB has responsibility under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities. Additionally there is a responsibility to promote the reduction of adverse social and environmental effects on the health of people and communities. With 4,250 staff, we are located in the lower South Island (South of the Waitaki River) and deliver health services to a population of 306,500.

Public health services are offered to populations rather than individuals and are considered a "public good". They fall into two broad categories – health protection and health promotion. They aim to create or advocate for healthy social, physical and cultural environments.

This submission is intended to provide feedback on the proposed Southland Water and Land Plan.

General Comments

The Southern DHB would like to acknowledge the extensive research and resources that have gone into the Water and Land 2020 and beyond project. The Southern DHB is generally supportive of measures taken by Environment Southland that will ultimately result in the improvement of water quality in Southland.
Public Health South is presenting this submission from the point of view of the following draft values statement on water.

1. Public Health South believes the health and wellbeing of current and future generations of Southerners should always take priority in water management decisions, particularly where there are competing interests for water use.

2. Public Health South, as part of the Southern DHB, has responsibility under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities. Additionally there is a responsibility to promote the reduction of adverse social and environmental effects on the health of people and communities.

3. Consequently Public Health South will work collaboratively with local government and iwi in all measures to protect the quality of water in the district.

4. Public Health South believes that all efforts to protect and restore water quality should be supported by the most comprehensive and current scientific evidence. Where evidence is lacking, the “precautionary principle” should be used.

5. Public Health South acknowledges that water is of major importance for Otago and Southland’s economic development. However, while economic wellbeing is necessary for good health, social, recreational, cultural and environmental assets such as drinking water quality, are also fundamental to health. A sustainable and thriving ecosystem is vital to supporting and sustaining the health of present and future generations in Otago and Southland.

We are disappointed that this plan doesn’t explicitly provide information on the current state of water quality in Southland as background for the plan. It is our observation there are a number of areas in Southland where water quality has been significantly compromised though land use. These area include but are not limited to:

- High nitrate levels in several ground water zones in Southland.
- High eutrophication risk of Waituna Lagoon.
- “Dead” (eutrophic) areas in other estuaries.
- High levels of faecal contamination that in some catchments is in the upper reaches.
- Both quantity and quality risks to some public water supplies due to competing interests of water users (e.g. Gore).

It has been our observation that there is significant confusion, particularly in the rural community, about the overall intention of the plan. This may be because the plan does not present adequate information on the current state of the environment. Public Health South strongly advocates that Environment Southland embark on a robust communication strategy as part of implementing this plan.

There are significant concerns about the ecological health of Southland’s estuaries and rivers that are not reflected in the Plan. For instance, the findings of the current science projects are not discussed (e.g. evidence that bacterial contamination arising from sheep plays a significant role in overall contamination levels of waterways¹). Ensuring the people of Murihiku can access information on the changing trends and science findings of water quality across Southland is critical to engaging the community on water quality and getting their ownership of issues. Raising awareness of what is occurring through trend analysis that is presented in state of environment reports are excellent tools in promoting and understanding the need to change approaches to existing land use. Transparency is essential in the process of developing sound policy based on public input. It reassures the public that they are all united in working towards a common goal and may allay fears that the farming community are the only ones being forced to make changes.

While the plan acknowledges all water users in Southland, it appears that the main audience will be the farming sector. We note that water is important to other sectors and the community for quite different reasons and on this basis are concerned that other values are not necessarily captured. We believe that issues such as bathing water quality are important from a tourism perspective. The potential need to place warning signs due to contamination of bathing water areas creates a potential reputational risk that will need to be effectively managed.

Whilst we have not submitted on the draft plan fully, we believe that it needs to go further to sustain water quality in Southland for future generations. We will provide further information to support this at the hearing.

Thank you for the opportunity to submit on your Water and Land Plan.

We wish to be heard with regard to this submission.

Yours sincerely,

Dr Derek Bell
Medical Officer of Health