



Pim Borren
Chief Executive
Otago Regional Council
Dunedin

1 December 2022

RE. Health of Otago's deep-water alpine lakes

Dear Pim,

Wai Wānaka and the Guardians of Lake Wānaka recently provided me with a report on the deteriorating trend in the health of Otago's deep-water alpine lakes, which I am attaching to this letter.¹ The report is well researched, drawing on a wide body of research that has been undertaken over time. It draws some concerning conclusions about the declining health of those iconic lakes. More importantly, it draws attention to a lack of monitoring on the lakes' evolving conditions and insufficient research targeted at addressing the origins of the problem or identifying mitigation strategies.

While these issues are not new, land use and human activity have intensified in recent decades. This is occurring over the entire catchments that feed these lakes.

Evidence indicating that the lake's water quality is declining is not matched by evidence-based management let alone specific research on these trends. The lack of end-to-end research to identify and address the many issues affecting the lakes is particularly worrying. It is not that there is a lack of concern or commitment from research and community organisations. Rather, there appears to be a lack of targeted funding and an absence of the leadership needed to drive research in the right direction.² A concerted management response from the multiple stakeholders – Department of Conservation, Otago Regional Council, Ministry for the Environment, Ministry for Primary Industries, Land Information New Zealand, Kai Tahu, research providers and community stakeholders – seems to be missing.

I am now making enquiries in accordance with my role and powers under the Environment Act 1986 to determine the magnitude of the issues and what actions, if any, my office might take to investigate the matter further. As part of my considerations, I would like to better understand the extent to which the degrading trend in the health of the Otago deep-water lakes is being monitored and addressed by your organisation before the situation becomes irreversible and starts to entail very costly remediating measures.

¹ Robertson, D., 2021. Understanding and protecting Otago's deepwater lakes. A Jobs For Nature Strategy for WAI Wanaka.

² Lake Wānaka Preservation Act 1973 purpose is inter alia "to maintain and, as far as possible, to improve the quality of water in the lake"

Managing water quality is one of the key responsibilities of regional councils, through their various regional plans for land use and water. I am conscious that multiple plan policies and rules affect water quality in the lakes and that monitoring and enforcement will vary.

I am therefore requesting that you provide me with details of how your organisation is, or is planning to, monitor the environmental state of the lakes and what actions you are undertaking or planning to undertake to address the findings of monitoring and research.

- Can you please identify which provisions in your current regional plans are most relevant to the health of Otago's deep-water alpine lakes?
- Do you consider the decline in health currently being observed is a result of inadequacies in the rules set out in these plans and if so, which ones?
- How much of the problem concerns the adequacy of monitoring and enforcement? What is being done to improve monitoring and enforcement?
- Are there any other plans, projects or strategies you are planning to address this issue? What other actions do you intend to take to reverse the decline in lake health?

I am aware that there are overlapping responsibilities between the various organisations to monitor, research, implement and enforce environmental protection. I am therefore also interested to understand the extent to which any collective and cooperative initiatives are being envisaged or implemented to ensure active evidence-based management supported by regular lakes environmental assessment and modelling.

I am concerned that the ongoing absence of such initiatives and leadership or any agreed formal process is placing Otago's remarkable deepwater lake assets at ongoing risk of degradation.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Simon Upton', written in a cursive style.

Simon Upton

Parliamentary Commissioner for the Environment
Te Kaitiaki Taiao a Te Whare Pāremata