

Environment Canterbury Review

Summary of submissions on Environment Canterbury
Review: a discussion document

July 2015

This report may be cited as:

Ministry for the Environment. 2015. *Environment Canterbury Review: Summary of submissions on Environment Canterbury Review: a discussion document*. Wellington: Ministry for the Environment.

Published in July 2015 by the
Ministry for the Environment/Internal Affairs
Manatū Mō Te Taiao/Te Tari Taiwhenua
PO Box 10362, Wellington 6143, New Zealand

ISBN: 978-0-478-41296-3 (electronic)

Publication number: ME 1204

© Crown copyright New Zealand 2015

This document is available on the Ministry for the Environment's website:

www.mfe.govt.nz

Contents

1. Introduction	4
2. Overview of submissions received	6
3. Support for the mixed-model governance structure	7
4. Alternative proposals.....	10
5. Regional issues.....	13
6. Goals for the review	15
7. Resource management powers.....	16
8. Transitional considerations	18
9. Other comments.....	19

1. Introduction

Objective of the discussion document

The discussion document *Environment Canterbury Review: A discussion document*, released on 18 March 2015, sets out the Government's proposal to introduce a mixed-model governance structure for Environment Canterbury (ECan) to be in place after the local government elections in October 2016.

The release of the discussion document was followed by a six week period of consultation in which the Government sought the view of the public on the direction of the review of ECan, the proposed mixed-model governance structure and other alternatives.

Consultation

Submissions on the discussion document opened on 18 March 2015, when the discussion document was released, and closed on 1 May 2015. An electronic copy of the discussion document was placed on the Ministry for the Environment (MfE) website and a link was provided on the Department of Internal Affairs (DIA) website. The Minister for the Environment and Associate Minister of Local Government also held ten meetings with city and district councils in Canterbury to discuss the proposal during the consultation period.

The ECan Review team (made up of officials from DIA and MfE) received 534 written submissions on the discussion document. This report deals only with the written submissions received by the ECan Review team during the consultation period.

Approach to analysis

All submissions that were received were assigned a unique identification number and entered into a central database. Each submission that contained unique text (ie, that was not created using a campaign form text) was analysed, and this analysis was recorded in the database.

Only a small number of submitters directly addressed all the questions set out in the discussion document. Where submitters' responses did address a question in the discussion document, their comments were recorded under that question in the database. All other comments were recorded as further comments.

As part of the analysis it was noted whether the submitter agreed with the goals of the ECan review (as set out in the discussion document), whether they opposed, supported, or partly supported the mixed governance proposal, and whether they supported retention of the Commissioners' special resource management powers. Where alternative proposals (to the mixed-model governance structure) were suggested, these were noted. Other comments and information provided were also noted in the database.

Every effort has been made to ensure the report accurately summarises the overall feedback on issues raised in the discussion document and the proposals outlined within it. However, we cannot guarantee that all views are reflected in this report.

Notes on conventions used in this document

Selected quotes from submissions have been included in the summary document. They have been selected for their value in illustrating issues raised by submitters or because they articulate issues in a way that is difficult to paraphrase without losing the original meaning. Their inclusion in this document does not imply that they have been given more weight over and above submissions that have not been cited specifically.

Where quotes from submissions are used, any unexplained acronyms or minor typological errors have been amended to allow for improved readability. Every effort has been made to ensure citations of submissions are accurate. However, where these have been manually typed there may be some minor errors.

Some parties have addressed issues that are outside the scope of and do not relate to the ECan Review. These have not been considered as part of this summary process.

Abbreviations used

Abbreviation	Term
Federated Farmers	Federated Farmers of New Zealand
Forest and Bird	Royal Forest and Bird Protection Society of New Zealand
Hurunui Water Project	Hurunui Water Project New Zealand Ltd
Irrigation NZ	Irrigation New Zealand Incorporated
LGNZ	Local Government New Zealand
Malvern Hills Society	The Malvern Hills Protection Society Inc

2. Overview of submissions received

In total, 534 submissions were received on the discussion document *Environment Canterbury Review: A discussion document*.

Five hundred and three submissions were received from individuals. Four hundred and seventy-five of these submissions contained standardised text that was sent via an online submission tool, submitted through the Labour Party website. All of the submissions made through the Labour Party's submissions tool oppose the mixed-model and support a return to a fully elected council in 2016.

Thirty-one submissions were received from organisations. Of these submissions:

- Fourteen submissions were from local authorities and associated groups (nine Canterbury councils, Horizons Regional Council, Waikato Regional Council, Otago Regional Council, Canterbury Mayoral Forum and LGNZ).
- One submission was from iwi, hapū and Māori organisations (Te Rūnanga o Ngāi Tahu).
- Seven submissions were from business and industry groups (Trustpower, Genesis Energy, Federated Farmers, Irrigation NZ, Hurunui Water Project, Property Council, and Waitaki Irrigators Collective).
- Five submissions were from Non-Governmental Organisations (NGOs), environmental groups and community groups (Riccarton Residents Association, North Canterbury Fish and Game Council, Artists for Saving Our Water, Malvern Hills Society and Forest and Bird).
- Three submissions were from other organisations (University of Canterbury, New Zealand Law Society and Human Rights Commission).
- One submission was from a political party (Labour Party).

3. Support for the mixed-model governance structure

Of the submissions that were received:

- Sixteen submitters support the mixed-model governance structure (mixed-model).
- Nine submitters support the mixed-model in part.
- Five hundred and five submitters oppose the mixed-model.
- Four submitters did not specify their support or opposition.

Submitters who support the mixed-model

Sixteen submitters support the mixed-model. These submissions were received from 13 organisations and three individual submitters.

Six of the nine submissions received from Canterbury councils support the mixed-model, provided that this is a transitional provision for the 2016-2019 local government term and there is a return to a fully elected council in 2019. The councils in support are: Ashburton District Council, Timaru District Council, Hurunui District Council, Mackenzie District Council, Waimakariri District Council and Waitaki District Council.

Accordingly, the Canterbury Mayoral Forum submission explains that the majority of the Canterbury Mayoral Forum (Christchurch City Council is noted as being excluded) supports the mixed-model as a transitional measure.

Property Council, Irrigation NZ, Waitaki Irrigators Collective and Hurunui Water Project support the mixed-model. These groups believe that the expertise of the appointed members combined with the community input provided by the elected members will enable effective decision-making. This view is supported by three individual submitters.

Genesis Energy and Trustpower also support the proposal, as it enables the Commissioners' progress in freshwater management to be built on.

Submitters who support the mixed-model in part

Four individual submitters, as well as Federated Farmers, support a mixed-model, but with a different number of appointed and elected members to that outlined in the discussion document *Environment Canterbury Review: A discussion document*.

Otago Regional Council accepts the *"necessity for a transition arrangement in Canterbury with the aim of reducing disruption in a return to a representative model for the region"*, but does not see the need for a permanent regional governance model that is different to the rest of the country. The Council is concerned that the mixed-model will be used as a *"benchmark for the remainder of regional government while ignoring the value of any local representation or the impact of the special powers"*.

Riccarton Residents Association supports the mixed-model as they do not want a return to the political stalemate of the previous regime.

Human Rights Commission believe the mixed-model would be a significant improvement [on the current model], but that a fully elected model is more consistent with the principles of participation and democracy.

Te Rūnanga o Ngāi Tahu supports the mixed-model, provided that the appointed members adequately represent Māori interests.

Submitters who oppose the mixed-model

Five hundred and five submitters oppose the mixed-model. These submissions were received from:

- Four hundred and seventy-five individual submitters who submitted through an online submission tool.
- Twenty individual submitters (who did not use the online tool).
- Ten organisations.

The four hundred and seventy-five individual submitters who submitted via an online submission tool all oppose the *“undemocratic governing arrangement proposed”*. The template submission, which submitters amended or added any additional comments, states: *“There is no reason to treat Canterbury differently to anywhere else in New Zealand. Six years ago, the people of Canterbury lost their right to vote for their representatives on ECan. This right must be restored immediately. Nothing less than full democratic representation will achieve this. The plan to have the government appoint half the council is not a return to democracy.”*

The Labour Party’s submission states that the mixed-model is *“unacceptable and does not deliver democracy”*, a *“denial of the most basic democratic rights”* and *“continues to disadvantage Cantabrians, contrary to other regions on the country.”*

Christchurch City Council opposes the mixed-model for the following reasons:

- Further clarity is needed on the roles of elected and appointed members and whether there is any differentiation.
- The Council is concerned that the mixed-model will reduce effective, open and transparent processes rather than provide stability for Canterbury.
- There is a risk that central government processes and decision-making will interfere with decision-making that is in the best interests of the Canterbury public.

Waikato Regional Council and Horizons Regional Council oppose the mixed-model as this represents a significant change in the way local government operates. Waikato Regional Council believes that such a change should not occur without a full and transparent review of all options, where local government is involved in the development of ideas. Horizons Regional Council is concerned that the appointed members could undermine local decision-making processes.

LGNZ opposes the mixed-model on the basis that:

- The District Health Board (DHB) model is unsuitable for local government as DHBs are funded by and accountable to central government rather than local voters and taxpayers.
- The level of complexity in the challenges facing ECan is overstated in the discussion document and other regional councils face similar challenges.
- Local government representatives should not be required to have specialist expertise or skills. Rather their role is to *“set direction, resolve differences over values and set priorities and most of all, supervise management”*.

- The previous discord that existed in ECan pre-2010 could be repeated under the proposed arrangement, as there is a risk of divergent interests between appointed and elected members.
- The model does not guarantee continuity. As the representation boundaries will need to be redrawn if a fully elected council is restored in 2019, there is no guarantee that the elected members will remain at ECan after 2019.

The Malvern Hills Society, North Canterbury Fish and Game Council and the New Zealand Law Society all oppose the mixed-model as it does not represent a full return to democratic rights. The University of Canterbury also opposes the mixed-model for the following reasons:

- No justification for the need for change in moving to a mixed governance model is provided in the discussion document.
- The electoral representation outlined in the discussion document is unfair to the people of Christchurch City as it suggests that the city is just one electorate.
- While a mixed model council may have some merit, the current model of six appointed members is unreasonable and unjustified. A smaller number of appointed members would be preferable.

Forest and Bird opposes the mixed-model and suggests that Councillors can hire commissioners and others for their skills and expertise if required. Waikato Regional Council suggests that *“there are many ways that councillors can be informed by expert opinion that do not involve experts sitting around the decision making table, such as working parties, and communications with key stakeholders”*.

Twenty individual submitters (who did not use the online submission tool) oppose the mixed-model. The reasons given include that the proposal is not democratic, is *“insulting”* to the people of Canterbury, and violates the principle of ‘no taxation without representation’. Submitters are concerned about the lack of accountability of elected members to the public.

Other responses

Selwyn District Council, Waimate District Council and two individual submitters did not specify their support or opposition for the mixed-model.

Selwyn District Council presents a neutral submission on the mixed-model, and expresses support for the LGNZ submission. The Council seeks lack of clarity on a number of issues, including:

- Whether the mixed-model is a transition measure and a fully democratic model will be reinstated in 2019.
- Whether the performance expectations will be the same for appointed and elected members.
- How the members will be remunerated, and whether they will be remunerated equally.

No consensus was obtained on the proposal from Waimate District Councillors. However all councillors agreed that:

- elected and effective representation must be at the core of ECan’s future governance structure; and
- a thorough examination of ECan’s governance structure cannot take place without having regard to its core functions (particularly freshwater).

4. Alternative proposals

Return to a fully elected council

Five hundred and one submitters support a return to a fully elected council. These submissions were received from:

- Four hundred and seventy-five individuals, via an online submission tool.
- An additional 20 individual submitters (who did not use an online submission tool).
- Six organisations.

Christchurch City Council proposes a return to a fully elected council in the 2016 elections, in accordance with the Government's previous indication, and what is set out in the legislation. In the Council's view, a fully elected council would:

- Allow for greater accountability of ECan representatives to those who pay for rates and charges.
- Maximise accessibility of Canterbury residents to representatives.

The New Zealand Law Society, Malvern Hill Society, Forest and Bird, and North Canterbury Fish and Game also support a fully elected council.

The Labour Party also submits that a fully elected council be installed from the results of the 2016 triennial elections.

Review of ECan's functions

A number of submitters propose that a review of ECan's functions be conducted, with a view to redistributing some of ECan's current functions to local authorities or other bodies.

Christchurch City Council proposes that a review of ECan's functions be conducted, with a view to establishing a Canterbury Water Authority (as recommended in a 2010 independent report¹) and relocating transport and other functions to local authorities in 2019.

Hurunui Council and Timaru District Council also propose that an alternative governance model for water management (such as a water authority) be considered for the period post 2019. One individual submitter agrees with this proposal.

Christchurch City Council submits that the planning and management of public transport be integrated into the functions of the City Council. This, in the Council's view would: allow for greater integration of public transport routes into the wider multi-model transport network; improve the function of public transport in the urban environment; and ensure greater alignment with land use planning (including parking) and the delivery of services and infrastructure.

Ashburton District Council supports a review of ECan's transport function with a view to it being transferred to city or district councils or a legal entity established to perform this function. Two individual submitters agree with this proposal.

¹ *Investigation of the Performance of Environment Canterbury under the Resource Management Act & Local Government Act*, February 2010, Rt Hon Wyatt Creech et al.

Variations to the numbers of elected and appointed members

Ashburton District Council supports a mixed-model governance arrangement, but favours a mix of eight elected and five appointed members, to provide for greater accountability of the members to their constituents. Federated Farmers also supports this proposal.

The Human Rights Commission proposes that any mixed-model has a significant majority of elected members, and a statutory requirement that appointments are made only to fill gaps in skills and experience of elected members.

Riccarton Residents Association proposes four elected members and three or four appointed members, because smaller numbers would mean fewer competing factions, smaller operating costs, and lower risk of disputes between members.

Extend the Commissioners' terms by three years before restoring a fully elected council in 2019

LGNZ advocates for the following process:

- The Commissioners continue at ECan until a full representation review is completed.
- The Local Electoral Act 2001 is amended during 2016/17 to introduce an area weighting for determining regional council constituencies.
- A full and substantive representation review is conducted, reviewing both the number of elected members for constituencies during 2017/18.
- There is a return to a fully elected council by October 2019 at the latest.

Selwyn District Council and Horizons Regional Council both support the LGNZ proposal. Waikato Regional Council acknowledges the points raised by LGNZ and states that the Government should give thought to this proposal.

Ngāi Tahu representation

Te Rūnanga o Ngāi Tahu (Te Rūnanga) supports a model that would provide for a 50/50 mix of Ngāi Tahu representation and Government appointed representation, alongside elected representation. This would, in its view, better achieve Treaty partnership objectives. It would also provide for a productive relationship with Ngāi Tahu and provide for engagement *“in a constructive and progressive partnership.”*

Te Rūnanga seeks the authority to appoint Ngāi Tahu members within the usual processes of appointment employed by Ngāi Tahu.

University of Canterbury and five individual submitters also specified that Ngāi Tahu representation must be provided for in the member appointment process.

Other options

Waimate District Council raised a number of alternative options, including:

- A mixed-model with seven elected and four appointed members.
- Fourteen wards in the Canterbury region. This would provide for representation across Canterbury that better reflects communities of interest in geographically large but sparsely populated areas.
- Unitary authorities in Canterbury.
- A separate water authority/authorities for Canterbury.

University of Canterbury proposes that four statutory appointments could be made: one on the recommendation of Ngāi Tahu; one by the Minister for Māori Development; one by the Children's Commissioner (to represent future generations); and one by the Parliamentary Commissioner for the Environment.

5. Regional issues

A total of 26 submitters answered Question 1:

'In your view, what are the most significant regional issues for Canterbury?'

Freshwater management

Twenty submitters consider freshwater management to be the most significant regional issue for Canterbury. The two major problems cited are:

- Degrading water quality due to changing land use activities, dairy farming and more intensive farming.
- Reduced river flows due to overtaking for irrigation.

These submitters feel that the current approach to freshwater management is unsustainable. They are concerned about the loss of Cantabrians' wellbeing and enjoyment of rivers, and future generations access to drinking water.

Democracy and governance

Fourteen submitters view the loss of democracy and/or governance as the most significant issue for Canterbury. This loss of democracy is noted particularly in relation to how money is spent looking after the environment, in relation to water issues and access to the Environment Court. Submitters favoured efficient, effective, informed and fair governance, that doesn't favour particular groups or pursue the Government's agenda.

Sustainability

Seven submitters view the sustainable management and protection of resources, for both current and future generations, as the most significant issue.

Climate change

Four submitters view climate change as the most significant issue. Of specific concern is the lack of long-term thinking about the impact of climate change on the east coast and failure to develop and adopt farming techniques that are more resilient to drought.

Māori participation

Te Rūnanga o Ngāi Tahu state the biggest issue is taking appropriate account of the principles of Te Tiriti o Waitangi and maintaining and improving opportunities for Māori to contribute to decision-making processes.

Other issues

Other significant issues include:

- Earthquake recovery (two submitters).
- Loss of land and declining soil quality resulting from rural land use (three submitters).
- Air quality (two submitters).
- Natural hazards (one submitter).
- Regional economic growth (one submitter).

6. Goals for the review

Twenty submitters answered Question 2:

‘Do you agree with the goals for Environment Canterbury’s governance?’

Thirteen submitters agree with these goals, three agree in part, and five disagree.

A further 19 responses were received on Question 3:

‘In your view, are some of the goals more important than others?’

Of those that agreed with the goals, three submit that it is now important to consider how they will be achieved. They note the importance of high quality leadership, and question the suitability of the mixed-model for achieving this. Two submitters note that all of the goals specified in the discussion document are attainable under a fully elected council.

Three submitters consider that the goals should be equal as *“they are all important”* and *“effective governance demands a balance across all goals.”*

One submitter describes the goals as *“lofty”* and another submitter would like to see further information on what is meant by each of the goals.

Ten submitters state that strong environmental stewardship, sustainability, or the preservation of land, water and air for future generations should be the highest priority goal. One submitter considers that freshwater management has too large a focus.

Four submitters state that the most important goal is *“accountability to local communities”*, and two submitters that it is *“high quality decision-making”* achieved through, for example, strong leadership and understanding the fundamentals of governance, and a balance of local representation and specialist skills.

Three submitters consider that economic growth is a more important goal, with one noting that the Christchurch rebuild is a key matter. Two submitters disagree with the goal of economic growth.

Te Rūnanga o Ngāi Tahu submits that the current goals are too narrow and do not reflect the cultural significance of mana whenua in the Canterbury region.

7. Resource management powers

Twenty-four (of the 534) submissions comment on Question 7:

'Should the mixed-model governance structure retain the special resource management powers currently used by the Commissioners?'

Nine of these submitters support retention of the powers, while 15 oppose.

Submitters that support retention of the special powers

Local authorities

Canterbury Mayoral Forum and four councils (of the five councils that commented on this question) support a continuation of the Commissioners' powers under a new governance structure.

Canterbury Mayoral Forum and Waimakariri District Council wish to see a continuation of the special powers until 2019 or until they are superseded by wider resource management reforms.

Hurunui District Council wishes to see the special powers retained, but if so, strongly recommends that it become mandatory to undertake pre-notification consultation, giving the opportunity for community input.

Ashburton District Council also supports retention of the Regional Water Committee and the ten zone committees so that local viewpoints are incorporated into decision making.

Waitaki District Council submits that the powers should continue to ensure all the major projects, that were commenced using these powers, can be completed.

Other groups

Te Rūnanga o Ngāi Tahu submits that the special powers should be retained, provided that ECan works co-operatively and collaboratively with Te Rūnanga *"to find win-win solutions to integrated water management"*.

Federated Farmers, supports the limited appeals process as this, in its view, encourages greater commitment to the collaborative process and reduces costly litigation and lengthy delays in plans becoming operative. Federated Farmers also supports a continuation of the revised process for water conservation order (WCO) applications and amendments to provide a more balanced approach that enables due weight to be placed on a community's economic, social and cultural wellbeing.

Submitters that oppose retention of the special powers

Genesis Energy, Trustpower and Irrigation New Zealand, as well as 12 individual submitters (who also oppose the mixed-model), oppose retention of ECan's special powers.

Genesis Energy and Trustpower submit that the special powers were legislated in order that the Natural Resources Regional Plan could become operative, and these powers are no longer needed for this purpose. Both companies consider merit appeals to be an important safeguard in the planning process, providing a check on local decision making. This view is supported in Irrigation NZ's submission.

A number of individual submitters comment on the need for national consistency in resource management powers.

One individual submits that the lack of an ability to appeal plan decisions (except on points of law) has limited the capacity to challenge policy and seek clarification on non-legal matters, resulting in poor planning provisions.

Another individual submits that the special powers resulted in elements of the new land and water plan being rushed and they should not be retained.

8. Transitional considerations

Twenty-four submitters commented on Question 6:

‘Are there any considerations we need to give when transitioning to the propose mixed-model governance structure?’

Fifteen submitters state that the transition to the mixed-model needs to be managed carefully to provide for certainty and continuity, and to ensure that the review does not result in substantive changes to the planning frameworks already in place.

Genesis Energy submits that new decision-makers should be trained to represent aspects of national interest where relevant (for example, in freshwater management).

Federated Farmers, Irrigation NZ, Waitaki Irrigators Collective, Te Rūnanga o Ngāi Tahu, a number of councils, and a number of individual submitters emphasise that the existing Commissioners should be re-appointed as members of the governance structure. Federated Farmers explain that this is necessary to *“capture institutional knowledge and enable the current work programme to continue smoothly”*. Trustpower submits that any loss of expertise of Commissioners should be carefully managed.

A number of individual submitters specify that the appointment process of appointed members needs to be clear and transparent, and that the criteria for appointments be clearly specified. One individual submitter states that *“appointed representatives should be highly qualified on environmental/freshwater matters and appointed by an independent authority not subject to the government of the day’s agenda”*.

9. Other comments

Democratic rights

A number of comments were made by submitters about democratic and human rights. These statements included:

- *“No taxation without representation.”*
- *“We will not be railroaded.”*
- *“New Zealand is either a fully democratic country, or not at all.”*
- *“If you refuse us this, and take away our right and freedoms to have the people we chose represent us, then it is the start of a slippery slope into dictatorship.”*
- *“It is punishment for the people of Canterbury for electing representatives that opposed the views of some powerful vested interests.”*
- *“Why has the Government backtracked on its prior commitment to restoring democracy?”*

Submitters also raise concerns about precedent. The Labour Party submits that *“the logic applied to the Government’s decision to proceed with a mixed governance model sets a dangerous precedent for other councils that may experience similarly challenging times in the future.”*

Performance of previous councils

Fourteen submissions made comments about the previous performance of ECan under Commissioners and councillors (pre-2010).

Seven submitters make comments on the previous council’s performance. Four submitters consider that the discussion document fails to present an accurate summary of their achievements/expertise. Forest and Bird *“rejects the assertion that the elected council was performing poorly and the appointed Commissioners have addressed ‘serious performance problems’”*. Two submitters note the dismissal of this council was unjustified. An ex-councillor, however, notes that there are numerous reasons for the *“dysfunctionality”* of the council.

A number of submitters believe that the commissioners have performed well and that ECan has operated efficiently and effectively. One submitter states that *“there have been real achievements by all parties, particularly with respect to environmental outcomes, as a result of the strong local involvement.”* Another submitter believes that *“the current commissioners have been very willing to listen to and act.”* However, other submitters state that the Commissioners have admitted to be *“failing residents”* by not meeting environmental commitments.

Representation

Fifteen submitters commented on representation at ECan, emphasising the need for fair representation on council and zone committees. Farmers, irrigators, the dairy industry and business are viewed as unfairly over represented. Five submitters also note that collaborative processes are not actually operating in a truly collaborative way.

Submitters seek that representation is balanced and fair. They raise questions and concerns about representation boundaries and when these will be finalised, how zone committees will operate under the mixed-model and how the elected positions will be filled.

Timaru District Council and a number of individual submitters emphasises in their submission that any governance structure must represent rural interests and fully reflect the needs of rural communities.

Public transport functions

Five submitters propose that ECan's public transport function should be transferred to city/district councils.

Youth perspectives

A number of submitters emphasise that the proposed mixed-model governance does not adequately provide for representation of youth interests.

University of Canterbury submits that the proposal *"fails to acknowledge the scale of problems that children in Canterbury will face"* in the future. University of Canterbury proposes one of the four statutory appointments (advocated for in University of Canterbury's submission) be made by the Children's Commissioner.

Ten submitters propose lowering the electoral voting age to 16, stressing the importance of engaging youth and valuing their perspectives. Two submitters state that greater thought should be given into the effect of decision-making on future generations.

Te Rūnanga o Ngāi Tahu suggests that the Government consider ways in which youth perspectives can be included in the design and implementation processes.

Discussion Document

Five submitters raise the concern that making comparisons to the District Health Board (DHB) model is unsuitable and misleading, as DHBs are responsible for central government funding, whereas regional councils make decisions concerning funding collected by local government.

Three submitters note that the discussion document only presented one option; the public should have opportunity to comment on alternative options.