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Sent: Friday, 21 March 2014 4:21 p.m.
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Subject: Selwyn Waihora Variation 1 Submission
Attachments: SWRPV1 Submission March 2014.doc

Categories: Purple Category

To whom it may concern;
Please find attached a submission from North Canterbury Fish and Game Council, in relation to Variation 1 of the Canterbury Land and Water Regional Plan.

Kind Regards
Scott

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SUBMISSION ON THE PROPOSED SELWYN WAIHORA REGIONAL PLAN VARIATION 1

Prepared under the Resource Management Act 1991

To: Environment Canterbury
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This is a submission on the proposed Variation 1 (as notified on the 22 February 2014) of the Canterbury Land and Water Regional Plan (CLWRP). We note the CLWRP has provisions that are still under appeal to the High Court.

Trade Competition

Pursuant to Clause 6 of Schedule 1 of the Resource Management Act 1991, Fish and Game confirm they could not gain an advantage in trade competition through this submission.

Hearing

Fish and Game wish to be heard in support of our submission.

Preliminary

Fish and Game's submission is structured as follows:

- Background - the importance of the sports fishery and game bird resource in Selwyn Waihora and the wider Canterbury Region
- General submission of North Canterbury Fish and Game's position in regard to the proposed Variation 1;
- The specific provisions of the submission as set out using the same system of identifying numbers as that contained in Variation 1;
- The wording of relief sought shows new text as underlined and original text to be deleted as strikethrough.

INTRODUCTION

BACKGROUND: The importance of the sports fishery and game bird resource in the Selwyn Waihora and Canterbury Region

1. The sports fish and game bird resources of the Selwyn Waihora Catchment and the wider Canterbury region are highly valued. On the basis of 2010/2011 licence figures, Fish and Game represent holders of over 33,000 angling and hunting licences in Canterbury. The sports fishery, in particular is significant, with over 450,000 angler days being spent on the Region's waters (NIWA National Angling Survey 2007/08). The value placed on the sports fish and game bird resource in a wider context is encapsulated by National Water Conservation Orders - Te Waihora/Lake Ellesmere 1990 and Rakaia River 1998.

Sports Fishery

2. Canterbury is one of the key regions in the country for sports fishing. In particular, the salmon fisheries are nationally important, with the vast majority of the national opportunity for salmon fishing occurring within the region. The Canterbury Region also provides for significant trout fishing opportunity, particularly given the region has the largest population in the South Island.
3. Sports fisheries have existed as part of a statutory regime in NZ since 1867, with the largely salmonid based fisheries a key value in and attribute of our freshwaters. The current statutory basis and regime for sports fishery management is provided under Part VA of the Conservation Act 1987, as part of freshwater fisheries management, together with associated Freshwater Fisheries Regulations 1983 and Angler's Notices promulgated annually under this legislation.

Game Bird Resource

4. Canterbury also provides for significant wildlife habitat and game bird hunting opportunity, with key wetlands such as Te Waihora and Wainono Lagoon, numerous other wetlands and its extensive rivers and lakes.
5. Game birds are recognised in the First Schedule of the Wildlife Act 1953 and their management by Fish and Game Councils under the Part II of that Act, with analogous regulations and annual Game Gazette Notices to the Anglers Notice. Please note that several of the principle game birds (grey duck, paradise shelduck, shoveler duck, black swan and pukeko) are native species.

Sports Fish and Game Bird Management

6. Sports fishery management sits within a framework established for freshwater fishery management and similarly game bird management within a framework of wildlife management jointly between Fish and Game Councils and the Department of Conservation in Part VB of the Conservation Act 1987. Aspects of fishery and game bird management (such as which species should be managed where) are covered by that legislation. Thus species management is primarily the function of DOC and Fish and Game Councils. The nature of this management is set out in some detail for each Fish and Game region in their respective statutory Sports Fish and Game Management Plans which have been through a public process and approved by the Minister of Conservation. These cannot be inconsistent with Conservation Management Strategies, for example. As statutory management plans, this sub-regional plan and other such

plans prepared under the RMA are obliged to have regard to such plans in their preparation (section 66(2)(c)(i)).

7. Management of the habitat of all freshwater fish and wildlife and appropriate provision for the amenity derived from the fishery and game bird resource, however, is clearly the responsibility of regional and district councils under the RMA. Sections 5(a) and (b), and section 6(a) (preservation of natural character), s(6)(d) (regarding public access to water bodies) 7(c) (the maintenance and enhancement of amenity values), 7(h) (protection of the habitat of trout and salmon), and 7(d)(intrinsic values of ecosystems) are directly relevant to sports fishery management. While sections 5(a) and (b), and sections 6(a) (preservation of natural character of water bodies including wetlands), 6(c) (protection of areas of significant indigenous vegetation and significant habitats of indigenous flora and fauna, 7(c), and 7(d) are directly relevant to game bird management.
8. The inclusion of the protection of the habitat of trout and salmon (s(7)(h)) in the RMA (1991) has a dual purpose; firstly in recognition of the national importance of these species. Freshwater sports fisheries are of high socio economic and socio cultural importance both domestically and internationally, providing a myriad of benefits to society (Weithman, 1999; Welcomme and Naeve 2001; Arlinghaus, Mehner & Cowx 2002).
9. Secondly, s(7)(h) provides de facto protection for our other freshwater species. Trout and salmon are amongst the most studied fish in the world. Salmonid habitat requirements (water quality and quantity and physical habitats) are well established in the literature. Regrettably the habitat requirements of most of our native fish species are much less well known. Given the sensitivity of salmonids to habitat degradation, it is recognised that the provision of salmonid habitat requirements provides protection for the health of other species in aquatic ecosystems, and for Life Supporting Capacity generally. This is another reason for the inclusion of the protection for the habitats of these species in section 7(h). There is a good correlation between the habitat requirements of salmonids and suitability for other species and other purposes.
10. The Selwyn Waihora Catchment and the wider Canterbury region's sport fishery and game bird habitats provide significant economic benefits to Canterbury and the national economy through generating increased visitor spend. There are many tourism associated activity and service providers who cater for anglers and game bird hunters, including specialised guiding services, accommodation and hospitality providers, transport and retail services. Many overseas anglers and hunters are affluent high value visitors.
11. Protection of our significant water bodies and game habitat is of vital importance for the maintenance and enhancement of Canterbury's reputation as a healthy and sustainable visitor region and agricultural producer. This also has national significance for ensuring New Zealand delivers on its 100% Pure New Zealand brand promise.

General Submission on Variation 1

12. Fish and Game support the intent of Environment Canterbury (ECan) and the Selwyn Waihora Zone Committee in developing an integrated catchment land and water plan variation to address significant resource management issues, and ensure that the catchment's land and water resources are sustainably managed and their values protected. However, we have a number of concerns regarding the proposed provisions of Variation 1, and submit that in its current form it fails to meet the purpose of the Act, give effect to the National Policy Statement for Freshwater Management 2011 (NPSFM), the Canterbury Regional Policy Statement 2013 (CRPS), the vision and principles of the Canterbury Water Management Strategy 2009 (CWMS) or adequately address the significant water quality and quantity issues this catchment faces.

Catchment Context

13. The Selwyn Waihora Catchment is one of the most heavily polluted catchments in the country, due predominantly to past and present land use activities, particularly agriculture. As noted in the Zone Implementation Programme (ZIP) and the ZIP Addendum, the ability to actively manage current water quality is hampered by the significant lag effects of nitrogen (in particular) taking between 10 and 30 years to enter both ground and surface water from land. This makes the task of managing current land use activity discharges problematic.
14. Coupled with this issue is the fact that a large scale irrigation scheme "Central Plains Water" (CPW) has received water permits to irrigate up to 60,000 ha within a catchment significantly over-allocated for water abstraction and with many water bodies already degraded.
15. Another factor of concern is that many existing consents do not expire until between 2030 and 2040, meaning the proposed changes in activity status for an existing water permit or consented activity may not have a material effect for a long time, within the proposed timeframes of Variation 1.
16. With these issues in mind, NCF&GC believe the provisions in Variation 1, while making some very positive changes, do not go far enough to address the potential non-performance of individual consent holders or the collective performance of these parties over the entire catchment.
17. The CWMS has a clear hierarchy of priorities upon which the collaborative process and regional planning documents are required to address. Based on our current interpretation of Variation 1 and the Selwyn Waihora ZIP Addendum it appears that priority is first given to agricultural viability (or to some degree profitability) before hard environmental limits and reductions are addressed.
18. There are some current deficiencies in Variation 1 in relation to achieving the 2037 targets and limits and we suggest additional mechanisms (within the tools available for ECan to apply) are necessary to monitor and effectively change land use behaviour and outcomes at both the individual property and collective catchment output level.
19. We know it is possible to measure the total nitrogen load level in the Selwyn Waihora Catchment at a given time shown as (Z) in the equation below. Using measuring mechanisms such as Overseer and Farm Environment Plans, it is also possible to

determine the estimated output of each land use activity, shown as (Y). By subtracting (Y) from the total load (Z), it is possible to estimate the nitrogen load being discharged as a result of the lag effect (X), as mentioned in paragraph 13 above and taking into account natural discharges of nitrogen.

$$\text{Total Catchment Load (Z)} - \text{Current Land Use Output Load (Y)} = \text{Lag Load (X)}$$

20. On the basis of this equation, it should be possible to monitor the collective progress of current land use practices in comparison to the 'lag load'. We suggest that Variation 1 must set more regular monitoring and performance review milestones to carefully monitor each of these variables. If the changes proposed by 'Good Management Practice' (GMP) initiatives do not result in a steady trajectory of decrease in Y, or we see X pushing target limit projections out of reach in working toward 2037, it may be necessary for ECan to impose further sanctions at a catchment wide level, beyond whatever compliance or enforcement tools are applied at the individual water permit or consent level.
21. For example, it may be necessary to review all consents at the "half-way point" in 2027, five years after the GMP additional requirements are required. At this point, ECan could decide if water take restrictions on new and existing consents need to be applied (proportionately based on performance) across all irrigators in the catchment. Land use discharge is to a large extent governed by access to irrigation water and this may be a more reliable means of sanction when compared to the challenges associated with specific enforcement of consent conditions. For ECan to make these catchment wide changes requires appropriate provisions to be made in Variation 1, similar to Policy 5.4 and Rule 10.2 in the operative Hurunui Waiiau Regional River Plan 2013, where the ability to review all consents may be triggered by an increase in specified nitrogen load or by state of the environment reporting for the catchment, including projections based on full consented resource use.
22. Without these broader catchment interventions, the significant long term risks to the environment may only receive secondary priority to the goal of maintaining farm viability and economic growth in this catchment, potentially prolonging some unsustainable land use practices.
23. We do not wish to see farms and other businesses go into receivership or struggle, but equally given the current state of the environment in this catchment, we do not think it is legal (under current environmental legislation) for the Selwyn Waihora Community to continue increasing land use discharges in the short term, if no firm consequential sanctions (beyond suggested consent management) occur until existing consents expire or until the 2037 targets and limits are not met.
24. The solutions proposed in this plan variation have set an N load of 4,830 tonnes per year as a target to be met no later than 2037. It is Fish and Game's position that clear "way points" be set in conjunction with 'state of the environment' reporting (at the catchment level) between 2022 and 2037, to be documented in Variation 1 at a minimum of five year intervals.
25. As stated in paragraphs 20 to 24, regular and effective monitoring will be a critical part of the implementation of Variation 1 and the Selwyn Waihora ZIP. As a minimum, a policy is required setting out 5 yearly catchment reviews of variables X,Y and Z as stated in paragraph 21, to be combined with a State of the Environment Report for the

catchment detailing performance against limits and targets and their trend analysis, compared with previous reviews and projections. The policy should also state that ECan as a result of this monitoring will undertake any necessary consent reviews required to safeguard the life supporting capacity and ecosystem function of catchment water bodies, in line with the first order priority of the Canterbury Water Management Strategy 2009, and in order to meet the Variation 1 limits and targets by 2037.

26. Fish and Game wishes to note the limited timeframe (less than one month) provided to submit on Variation 1, given the lengthy process taken to reach a notified plan variation. Some new information has also been made available one week out from the closing date and we therefore request that scope is maintained for further analysis and comment of the research that has underpinned the policies and rules contained in Variation 1.

Part 11.4 Policies – Selwyn - Waihora

1. Policy 11.4.1 - Oppose

- 1.1 Fish and Game does not support this policy while it does not include avoidance of cumulative effects on water quality in springs and tributaries flowing into Te Waihora/Lake Ellesmere. It is important to include provision for both flow and water quality in these springs and tributaries and Te Waihora/Lake Ellesmere to safeguard the life supporting capacity and ecosystem function of these water bodies.

1.2 Relief sought

Amend 11.4.1 to read:

Manage water abstraction and discharges of contaminants within the entire Selwyn Waihora catchment to avoid cumulative effects on both the water quality of Te Waihora/Lake Ellesmere and the flow and quality of water in springs and tributaries flowing into Te Waihora/Lake Ellesmere.

2. Policy 11.4.2 to 11.4.5 - Support

- 2.1 Fish and Game support the recognition of Ngai Tahu values and the introduction of a Cultural Landscape/Values Management Area, given we share some mutual objectives in relation to the sensitivity of this area and the need for wise management under kaitiakitanga.

2.2 Relief sought

Retain wording in 11.4.2 to 11.4.5

3. Additional Policy 11.4.6 Requested

- 3.1 Fish and Game considers Variation 1 is deficient in providing specific reference to other freshwater values beyond cultural values, in relation to amenity, recreation and in some parts biodiversity. The environment like customary use is a first order priority in the Canterbury Water Management Strategy 2009. Recreation and amenity are second order priorities alongside irrigation, so Fish and Game believe there is adequate justification for the addition of this generic policy. This proposed policy addition below is supported by objectives in the CLWRP 3.8, 3.15, 3.17 and 3.19.

3.2 Relief sought

Insert the following policy into Variation 1

11.4.6 "Ensure that land use activities and development are managed so that the life supporting capacity and ecosystem function of water is safeguarded; and where appropriate maintain or enhance freshwater values including the trout fishery, trout spawning, recreational, and amenity values; areas of significant indigenous vegetation and significant habitats of indigenous fauna; and the natural character of waterbodies".

4.0 Policies 11.4.6 to 11.4.11 – Oppose in part

Fish and Game supports the intent of these land use policies in regard to improving water quality and reducing the negative impact of discharges into the catchment, through working to target and limits. However, insufficient time has been provided since the notification of Variation 1 to effectively comment on the targets and limits in Table 11(i) and their importance in achieving the broader policies and rules in Variation 1 and the CLWRP. These limits and targets may be inappropriate for achieving the stated "resulting actions" in Variation 1 and thereby require further improvement.

4.1 Relief sought

Retain the policies 11.4.6 to 11.4.11 as worded, with the exception of not adopting the targets and limits in Table 11(i). Fish and Game reserves the right to question the appropriateness of the targets and limits in Table 11(i) and suggest alternatives.

5.0 Policy 11.4.12 to 11.4.14 Support in part

Fish and Game supports the intent of these policies and the stated timeframes to reduce the discharge of contaminants into the catchment and the requirements listed specifically in 11.4.12, including application of the 15kg of nitrogen per hectare discharge threshold. Fish and Game may seek improvement in the detailed provisions contained in 11.4.12 a, b, c and d, 11.4.13 a and b, in order for the intent of these policies to be adequately achieved. The percentage reductions in 11.4.14(b), according to land use activity, may not be appropriate and require improvement in order to meet the proposed limits and targets in Variation 1.

5.1 Relief sought

Retain wording in 11.4.12 to 11.4.14 but retain the scope for Fish and Game to seek further improvements on the detailed provisions in these policies.

6.0 Policy 11.4.15 Oppose in part

This policy seeks to play an important role in addressing non-performance in relation to the reductions set in 11.4.14(b), however the policy as it is currently written does not provide adequate guidance for consent planners. Fish and Game request an extension to this policy that stipulates the minimum review periods for individual property consents beyond 2017 and 2022 GMP requirements (such as incorporating the rolling four year baseline average), to adequately enable any necessary and appropriate enforcement and water permit sanctions on a property, should there be significant non-performance.

6.1 Relief Sought

Extend wording in this policy to stipulate minimum review periods for individual properties and provide better guidance for consent planners in managing non-performance of individual properties.

7.0 Policy 11.4.16 Oppose in part

Fish and Game supports a maximum nitrogen discharge per hectare/per annum limit to apply in 2037, however we believe the level set may not be an adequate sanction to change land use behaviour or effectively address the phasing out of over-allocation at higher discharge levels; therefore we oppose this policy limit at its current level.

7.1 Relief Sought

Fish and Game believe the proposed numerical limit may be set too high to assist in achieving the required limits and targets set in Variation 1 and to meet the requirements of Part 2 of the Act and the NPSFM. Further examination of the justification used to derive this limit may indicate the set level in kilograms should be lowered.

8.0 Policy 11.4.17 – Oppose in part

While Fish and Game supports the intent of this policy in regard to improving water quality targets for irrigation schemes in the catchment, insufficient time has been provided since the notification of Variation 1 to effectively assess and comment on the targets and limits referenced in Section 11.7.3 including 11(j). These targets and limits may be inappropriate for meeting the requirements of the Act, including the NPSFM and be contrary to the vision and principles of the CWMS.

8.1 Relief sought

Retain policy 11.4.17 as worded, with the exception of not adopting the targets and limits referenced in Section 11.7.3 without further examination. Fish and Game may wish to question the appropriateness of these targets and limits and suggest alternatives in order to improve this policy.

9.0 Policies 11.4.18, 11.4.19, 11.4.20 Support

Fish and Game note the voluntary nature of these policies to improve aquatic habitats and to reduce the discharge of phosphorus and other contaminants into water. These policies can work alongside wetland, riparian and other management provisions in the CLWRP. We would also like to see phosphorus target limits introduced into Variation 1 that would encourage the activities these policies are designed to enable.

9.1 Relief sought

Retain the policies 11.4.18, 11.4.19 and 11.4.20 as worded. Add phosphorus target limits to Tables 11 i, j and k.

10.0 Policies 11.4.21 – 11.4.28 Oppose in part

Fish and Game supports the the intent of these policies with the exception of the allocation limits specified in 11.4.21 as Table 11(e), and 11.4.28 as tables 11(c) and 11(d). These allocation limits may not be appropriate and may require improvement in order to achieve the intent of these policies.

10.1 Relief sought

Retain wording in policies 11.4.21 to 11.4.28 but note that the limits referenced in 11.4.21 as Table 11(e) and 11.4.28 as tables 11(c) and 11(d) need further assessment as to their appropriateness in achieving the intent of this policy.

11.0 11.4.28 Oppose

Fish and Game does not support this policy due to the exclusion of existing consent holders until the time of consent expiry. The clear over-allocation of water takes in the Selwyn Waihora Catchment must be addressed sooner, in order to ensure sufficient flows that meet

the life supporting capacity and ecosystem function of these water bodies; along with the protection of cultural health, in-stream amenity and recreation values, and the protection of trout and salmon habitat.

Relief sought

Amend the wording of this policy as follows:

Protect the ecological and cultural health of the Waikirikiri/Selwyn River and lowland streams by including the minimum flow and partial restrictions in Tables 11(c) and 11(d) on existing water permits and consents, and new and replacement resource consents from 2025.

12.0 Policy 11.4.29 Oppose

Fish and Game oppose this policy in its entirety because existing and new consent and water permit holders are already to receive significant concessions on delayed minimum flow restrictions in Table 11(c), despite the current degradation to the environment from over-allocation. This is due to the new minimum flows not applying until 2025 for new consents, and only applying for existing consents or water permits when they expire.

Fish and Game believe 2025 is a very reasonable timeframe to adjust water use practices and that any further concessions such as staged increases in the minimum flow, will significantly delay and jeopardise meeting the intended environmental flow and water quality objectives, limits and targets in Variation 1, the CLWRP and the CWMS.

12.1 Relief Sought

Delete policy 11.4.29.

13.0 Policy 11.4.31 – Support

Fish and Game support Policy 11.4.3 with reference to the prohibition of damming on the mainstems of the Selwyn River and Waianiwiwi, but request improved wording in this policy.

13.1 Relief Sought

Include wording as follows:

Prohibit in-stream damming of the full flow on the entire main stem of the Selwyn River/Waikirikiri, and separately prohibit instream damming of the Waianiwiwi River mainstem above its confluence with the Selwyn River/Waikirikiri.

14.0 Policy 11.4.32 Support

Fish and Game support the intent of this policy to alleviate pressure on groundwater use and support the provisions 11.4.32 (a) to (i).

14.1 Relief Sought

Retain as worded.

Part 11.5 Rules – Selwyn - Waihora

15.0 Rules 11.5.6 to 11.5.8 Support

Fish and Game support these permitted activity rules and the associated conditions.

15.1 Relief Sought

Retain as worded.

16.0 **Rule 11.5.9 Support in part**

Fish and Game support the intent of this rule but note that the restricted matters for discretion in 11.5.9, numbered 3 and 4 contain nitrogen discharge reductions, limits and targets that may not be appropriate and require improvement in order to achieve the objectives and policies in the CLWRP and Variation 1, the vision and principles in the CWMS; as well as meeting the requirements of Part 2 of the Act and the NPSFM.

16.1 **Relief Sought**

Retain existing wording but allow for the improvement of the policies, reductions, limits and targets as referenced under restricted matters for discretion 11.5.9, numbered 3 and 4.

17.0 **Rule 11.5.10 to 11.5.12 Support**

Fish and Game support these rules because they assist ECan to address the over-allocation of nutrients in this catchment.

17.1 **Relief Sought**

Retain as worded.

18.0 **Rule 11.5.13 Oppose in part**

Fish and Game oppose this rule as the limit set may not be adequate to achieve the desired catchment limits and targets in this plan variation. We therefore oppose this limit at its current level.

18.1 **Relief Sought**

The proposed limit may be set too high to achieve the required limits and targets in Variation 1. Further examination of the research and evidence used to derive this limit is required to determine its appropriateness before this rule is adopted.

19.0 **Rule 11.5.18 and 11.5.20 Support**

Fish and Game support these stock exclusion policies and note they will assist in meeting the catchment requirements under Part 2 RMA, NPSFM, CRPS and the vision and principles of the CWMS.

19.1 **Relief Sought**

Retain the rule as worded.

20.0 **Rule 11.5.32 Oppose in Part**

Fish and Game supports this rule with two exceptions. Firstly, that the minimum flows, allocation limits and groundwater level restrictions in tables 11 c,d,e,f,g and h, may be inappropriate to meet the requirements of Part 2 of the RMA, NPSFM, CRPS and the CWMS. Secondly, that the restricted matters for discretion be amended to include the following:

20.1 **Relief Sought**

Amend the rule to include:

The exercise of discretion is restricted to the following matters:

- 1. The rate, volume and timing of the water take; and*
- 2. For new resource consent applications that are not a renewal of an existing consent, whether the amount of water to be taken and used is reasonable for the proposed use. In*

assessing reasonable use for irrigation purposes, the CRC will consider the matters set out in Schedule 10; and

3. The availability and practicality of using alternative supplies of water; and

4. The application efficiency where water is to be taken and used for irrigation; and

5. The proximity and actual or potential adverse environmental effects of water use on any significant indigenous biodiversity and adjacent dryland habitat; and the protection of trout and salmon habitat; and

6. For a surface water takes:

(i) The effects the take has on any other authorised takes or diversions; and

(ii) Whether and how fish are prevented from entering the water intake; and

(iii) The provisions of any relevant Water Conservation Order; and

7. For groundwater takes:

(i) The maximum rate of take, including the capacity of the bore or bore field to achieve that rate, and the rate required to service any irrigation system; and

(ii) the actual or potential adverse environmental effects the take has on any other authorised takes, including interference effects as set out in Schedule 12; and

(iii) whether salt-water intrusion into the aquifer or landward movement of the salt water/fresh water interface is prevented; and

(iv) the protection of groundwater sources, including prevention of backflow of water and contaminants; and

(v) the appropriateness of applying adaptive management conditions.

21.0 Rule 11.5.42 Support

Fish and Game support this rule as it will help safeguard the life supporting capacity and ecosystem function of these rivers.

21.1 Relief Sought

Retain as worded.

22.0 Rule 11.5.44 and 11.5.45

Fish and Game support the managed removal of fine sediment for the purposes of habitat restoration, in line with our organisation's statutory obligations.

22.1 Relief Sought

Retain as worded.

11.6 Freshwater Outcomes – Selwyn Waihora

22.0 Table 11a – Oppose subject to further investigation and clarification

Fish and Game notes that the identification of freshwater outcomes in Tables 11a and 11b may not meet the requirements for limits as defined under the NPSFM or meet the binding objectives and policies of the CLWRP, CRPS and the vision and principles of the CWMS. It is not clear what the timeframes are for achievement of these freshwater outcomes. The specific indicators may also not be appropriate for safeguarding life supporting capacity and ecosystem function.

22.1 Relief Sought

Fish and Game seek clarification on the above questions relating to Table 11a and may suggest alternative indicator levels to those proposed in the table.

23.0 Tables 11(k) and 11(l)

Fish and Game note the water quality limits in tables 11(k) and 11(l) prevail over the region wide limits in Schedule 8, but it is not immediately clear how these limits have been derived or how they are to be applied. There is also a lack of timeframes with respect to the achievement of these limits. It is a concern that the Zone Committee has recognised that phosphorus is a major issue for the catchment yet there are no phosphorus limits for major tributaries in the catchment and no load levels for the major tributaries or lakes in the catchment.

23.1 Relief Sought

Fish and Game seek clarification on the above questions relating to Table 11(k) and 11(l), and may suggest alternative and additional water quality limits to those proposed in the tables, in order to meet the requirements of Part 2 of the Act, NPSFM, CRPS and the vision and principles of the CWMS.

North Canterbury Fish and Game Council

Scott Pearson
Environmental Advisor

20 March 2014