

From: achristensen@csifgc.org.nz
Sent: Monday, 26 March 2018 9:23 a.m.
To: Mailroom Mailbox
Subject: LTP Submission
Attachments: CSIFG submission to LTP 2018-28.pdf

Hello

Please find attached a submission in relation to the Long-Term Plan 2018-28 from Central South Island Fish & Game.

Kind regards

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Environment Canterbury
c/o mailroom@ecan.govt.nz

SUBMISSION ON ENVIRONMENT CANTERBURY'S LONG-TERM PLAN 2018-28

Fish & Game Councils are Statutory Bodies with Functions (*inter alia*) to:

'manage, maintain, and enhance the sports fishery and game resource in the recreational interests of anglers and hunters

'to maintain and improve the sports fish and game resource by maintaining and improving access; ...

'In relation to planning, -

To represent the interests and aspirations of anglers and hunters in the statutory process, ... and

'To advocate the interests of the Council, including its interests in habitats:...

Section 26Q, Conservation Act.

CSI has an interest in the Long-Term Plan (LTP) and the programmes that it supports as they relate to the matters above and as defined by our statutory responsibilities. There are several programmes in the LTP that have an impact on our values and interests as they relate to the sports fish and game resource.

The Central South Island Fish & Game Council (CSI) makes the following submission on the Long-Term Plan 2018-28.

Freshwater Management

Freshwater management is an important issue for CSI and we consider investment by ECan in this to be warranted and necessary.

Programme 1: CWMS Facilitation

CSI is supportive of the ongoing commitment and increase in funding for CWMS facilitation in order to address the complexity of water quality and quantity issues in the region and to meet the targets

Statutory managers of freshwater sports fish, game birds and their habitats

Central South Island Region

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specified in the strategy. CSI believes that further work is needed in this area to ensure that all targets are given effect to and that they will be met. CSI's interest mainly lies in Ecosystem health/biodiversity, Natural character of braided rivers, Recreational and amenity opportunities, and Environmental limits. However, we maintain an interest in other target areas specified in the CWMS that may impact on those referenced above, such as Irrigated land area and Water-use efficiency.

Programme 2: Environmental Monitoring and Progress Reporting

CSI considers that monitoring is essential to meet the freshwater outcomes identified in the Land and Water Regional Plan (LWRP). We support the move and the resources allocated for data and real-time reporting to inform how water quality parameters are tracking in comparison to freshwater outcomes and provisions in the LWRP and the National Policy Statement for Freshwater Management (NPSFM). It is important to understand how situations and activities on the ground are affecting ecosystem health currently, whether it be related to water quality or water quantity or both.

Programme 3: Zone and Regional Delivery

Implementation of the LWRP is incredibly important in order to meet the freshwater outcomes identified for each zone. It is imperative that support be provided to landowners so that there is a clear understanding around what is required to meet the provisions in the plan. It is these on-the-ground actions that have the greatest impacts on freshwater and biodiversity.

CSI is also interested in the report described at 1.3.4 on the implementation of GMP, but we are also interested to understand how GMP and its implementation affects ecosystem health in terms of meeting limits and outcomes. We consider that this is an important and critical link to make, that can be achieved partly via real-time data monitoring that is then made easily accessible for all parties.

Programme 4: Resource Management Act Water Framework

CSI does not support a reduction in funding of \$250,000 every year for the next three years. This is an important area of work that identifies how freshwater outcomes will be implemented and the tools necessary to do this.

It is identified in the LTP that the Ashburton/Hakatere catchment is the most suitable catchment for consent reviews. The LWRP s13 specifies that a minimum flow of 6 cumecs be set from 2023 for the Ashburton River. It is crucial that water permits are tied to the community's desired outcomes for freshwater as they are stated in the provisions of the relevant plan. It is acknowledged that this kind of work needs funding, and we question whether cutting funds will allow this to happen, whilst still enabling work in other areas.

It should also be noted that the OTO ZIPA has recommended that consents be reviewed upon the plan becoming operative to help achieve the objectives within a reasonable timeframe. Whilst this recommendation is still pending feedback from the wider community and the plan process, it should

be expected and planned for at this stage. CSI supports this recommendation by the Zone Committee and strongly believes that funding for this should be made available.

CSI has long voiced concerns over the state of the Hakataramea River and the need for a review of the Waitaki Catchment Water Allocation Regional Plan (WCWARP) as it relates to the Hakataramea River. We are disappointed to see that this review is still scheduled for 2022. This review, as it pertains to water quantity, is considered critical to safeguard life supporting capacity and in particular, the health of the salmon fishery. We made a presentation to the Lower Waitaki Zone Committee and have engaged with a number of ECan staff and also with ECan councillors to discuss and highlight our concerns. Extensive evidence was presented during *Infinity Investment Group Holdings Limited vs Canterbury Regional Council* and it was found that the Hakataramea River and “the water quality and the state of the aquatic ecosystem are continuing to deteriorate (without any effects from the Infinity proposal).”¹ CSI considers that science and technical work needs to be undertaken now and that a plan change is necessary to give effect to the NPSFM. Reducing costs over the next three years is not considered to be appropriate in terms of this important piece of work that needs to be addressed urgently and moved forward.

Biodiversity and Biosecurity

Programme 1: Regional Biodiversity

Funding to support regional biodiversity issues is considered important to maintain and protect Canterbury ecosystems. CSI endorses a multi-agency approach and a coordinated effort to address regional biodiversity issues and projects. CSI sits on the Timaru District Council Ecosystem and Indigenous Biodiversity Steering Group and we believe that a coordinated approach will have better outcomes for the region in terms of getting the greatest benefits in the most efficient and effective manner.

Programme 3: Braided Rivers

The health of Canterbury’s unique braided rivers is considered important and funding dedicated to these rivers is supported by CSI. CSI has a long history with braided rivers in our region, in particular, the Rangitata River Water Conservation Order. We greatly value its outstanding characteristics for which it is recognised, and support work in this area that acknowledges these values. The Braided Rivers Action Group (BRAG), of which CSI is a member, has worked hard over the last year to try and better understand the diverse issues associated with the braided river environments. Some of these issues stem from past practices; in some cases, these practices need to be reassessed in light of the changing views around the importance of braided rivers and the importance that they have in the

¹ *Infinity Investment Group Holdings Limited vs Canterbury Regional Council* [2017] NZEnvC 36 at [323].

Canterbury region. A lot of work has been undertaken to date by the group, which was necessary to inform actions as we move forward. CSI encourages ECan to support this project going forward.

Programme 4: Wetlands

CSI strongly supports funding for wetland protection and enhancement. Wetlands are an important feature in Canterbury and play an important factor in ecosystem health. CSI takes a strong interest in wetland health as it has a direct impact on water quality, habitat and biodiversity, amongst other benefits. CSI considers that wetlands are of national importance.

Hazards, Risk and Resilience

Programme 2: Navigation and recreational boating safety

CSI has had extensive involvement in the Navigation Safety Bylaw 2016 and Controls process, which effectively limited boating matters to those of safety only. This has left a huge gap as to how CSI manages the adverse effects of boating on the sports fishery and even recreational and amenity values. CSI presented evidence at the bylaw hearing that discussed the move taken by ECan to consider only matters of safety without further considering the adverse impacts that this would have on conservation, habitat and other values. CSI was told by ECan that an informational “booklet” would be produced to help bring all relevant boating information together in one place for easy use and understanding as at the moment, it is split between bylaws, district plans, and provisions set under the Wildlife Act (1953) for wildlife refuges and varies with each refuge. This “booklet” is yet to come to fruition. CSI considers that this would be a valuable piece of work and that a small amount of funding should be allocated to this project under 6.4.1.

Regional Leadership

Programme 5- Plans, Consenting & Compliance

CSI supports compliance monitoring to ensure the works programmes are meeting zone outcomes. Advancements in this area are considered necessary to better understand how current activities (permitted and consented) are or are not meeting consent requirements (depending on the activity status), and what kinds of impacts this has on the receiving environment. Understanding current environmental trends is an important indicator for how the region is tracking and can give an indication on whether the trajectory of improvement towards the freshwater outcomes will be met.

Programme 6- Our Information and Advice

The commitment to providing open source, accurate data is important in order to better understand the state of the environment and to be able to access the information in an easy way. CSI supports funding in this area.

A handwritten signature in black ink, appearing to read 'A Christensen', with a long horizontal flourish extending to the right.

Signed: A Christensen

Date: 26 March 2018