

## Make Submission

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<b>Submission by</b>	New Zealand Federation of Freshwater Anglers Inc (Mr Rex Neville Gibson - 77368)
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### Freshwater Management Support/Oppose

See page 6 of the Consultation Document.

**Please select one of the following:** I generally disagree with the activity proposed for Freshwater Management.

### Freshwater Management Comments

**Please provide any comments.**

**The New Zealand Federation of Freshwater Anglers Inc.** (the "Federation") disputes the statements in the consultation documents which refer to the Good Management Practice (GMP) policy for farmers. This approach has registered little or no progress in the past and without significantly greater monitoring and enforcement is unlikely to be successful in the future.

We also dispute the inference of success in the statement that staff within the Freshwater and Biodiversity portfolios has worked closely to ensure that resources are optimised. The water related resources have been degraded to such an extent that the lowland waters potentially available for recreation in Canterbury are virtually all "off limits" for recreationists. The various recreation pursuits of picnicking, swimming, fishing, rafting, kayaking, etc. have all been driven from the lowland catchments. Each of these activities had a significant clientele and related commercial and social well-being basis; from equipment supply to family enjoyment.

In February 2017 the Federation's figures (taken from the ECAN website figures) showed, on a sample day, that the total water flow across 26 lowland rivers in ECAN's region was 18 cumecs. Eighteen

bathtubs of water flowing past is insufficient to cater for any of the water-based recreational pursuits of Canterbury's 500,00 residents. This was not the case before industrial dairying was given free-rein to "waste" most of the water it takes.

The water issues in Canterbury are dominated by the excessive water usage of the dairy industry in terms of both quantity and quality considerations. The Federation is primarily concerned with the quantity issues and the apparent lack of regional guidelines of minimum flow regimes in our waterways. The flow regimes are not required, or designed, to consider oxygenation which is a key limiting factor in water quality and thus biodiversity. We strongly urge consideration of new minimum water flow management strategies based on biodiversity enhancement.

With freshwater ecosystems among our most imperiled ecosystems on the planet it is unclear in the LTP whether ECAN considers the waterways in its rohe as ecosystems or just inert resources to be used in "fit for purpose" agricultural systems, such clarity is important for ratepayers to evaluate ECAN's motives. The "local solutions" approach is heavily weighted in favour of those who inefficiently exploit this resource. While the Federation applauds the presence of a Mana Whenua Cultural Land Management Advisor in the Selwyn Waihora zone it is disappointed that the cultural values, developed over the last 170 years, of Tangata Tiriti, (which include picnicking, swimming, Sports fishing, etc.) are not represented in an equal way with commercial interests in all zones.

We also applaud the proposed appointment of two Land Management Advisors but would like to see both the purpose of their role and their job description include monitoring soil health based on biodiversity and enforcement capability. Soil health and its ability to process the excessive nitrate run-off from dairying are significant limiting factors in the health of the freshwater resources of Canterbury.

The LTP fails to address the circumvention of the long standing water conservation orders by irrigators tapping into aquifers adjacent to the Rakaia; and also the Rangitata and Waimakariri. The net result of the Rakaia, Waimakariri and Rangitata flows dropping significantly between the gorge and the sea as a consequence should not be ignored.

The adjacent shallow river fed aquifers are also raided significantly in the Selwyn and Opihi catchments making a mockery of any attempt to establish minimum river flow figures there.

The overall water degradation of the last decade has shown that the only effective tool that ECAN has in this area is enforcement. The Long Term Plan has to allow for far greater resourcing of monitoring and enforcement.

**Key points:**

1. The GMP is a proven failure and requires significantly improved enforcement methods
2. Capture of the water resources by one industry has almost eliminated the lowland rivers as recreational sites in Canterbury
3. Minimum water flows in lowland rivers are currently insufficient to sustain freshwater ecosystems
4. The plan gives no recognition to the cultural needs of most New Zealanders
5. The LTP does not sufficiently address the issues of soil health and their implications on water health
6. The LTP fails to address the cynical circumvention of the Rakaia River Water Conservation Order
7. The consultation document is unclear on how much funding will be allocated for monitoring and enforcement. The Federation would like to see more transparency in this.

I would like to speak to this submission.