

NEW ZEALAND SALMON ANGLERS ASSOCIATION INCORPORATED

**SUBMISSION ON RESOURCE CONSENT APPLICATIONS CRC 182535,
182536, 182537, 182538, 182539, 182540, 182541, 182542, 182630, 182631 BY
RANGITATA DIVISION RACE MANAGEMENT LIMITED**

My name is Tony Humphreys and I am the President of the New Zealand Salmon Anglers Association ("NZSAA"). I have been a member for over 30 years. I have fished for salmon since the early 1970's when I first arrived in New Zealand from Canada. In those early years I saw plenty of salmon caught. The mid 1990's saw a real surge in salmon numbers. Since then it has been a gradual decline in numbers with odd years, such as 2008 and 2013, being the exception.

The New Zealand Salmon Anglers Association was incorporated as a society in 1972 as a result of concerns on the water demands of future irrigation and hydro schemes and the failure of administrators at the time to come up with a practical large-scale salmon management policy. These were recognised as the principal factors governing whether the sea-run salmon fishery would survive or not.

In the intervening years, NZSAA has actively contributed to the processes that resulted in placement of Water Conservation Orders on the Rangitata and Rakaia Rivers which legislate to preserve and protect the outstanding natural characteristics and natural waters of these braided rivers, and include outstanding wildlife habitat, fisheries, recreational and angling features.

However, the number of salmon in New Zealand rivers has now declined to the point where the fishery has become seriously endangered. The reasons for this decline are not scientifically proven but have variously been attributed to commercial activities, ocean and spawning river conditions.

NZSAA and kindred organization, Rangitata Salmon Trust, undertake salmon fishery enhancement programmes in the spawning streams of the salmon rivers in Canterbury. In the North Canterbury region each year eyed salmon ova are hatched from specialised incubation units placed into the rivers to assist the salmon runs. We have planted over one million eyed ova into our north Canterbury selected river over the last 10 years. Members and supporters of NZSAA also assist Fish & Game North Canterbury's salmon hatchery sites with the raising and release of salmon smolt.

All these efforts contribute to the survival and enhancement of the sea run salmon fishery in the streams and rivers of the South Island and improve the sport fishery.

NZSAA will continue to advocate on any environmental or regulatory matters, including resource consent applications that potentially affect the survival of the natural sea-run salmon fishery.

Traditional and existing fish screens on our rivers, including RDR, are ineffective and mostly poorly maintained and unmonitored for compliance. The resulting significant loss of migrating salmon smolt and returning adult salmon impacts hugely on our enhancement efforts.

TABLED AT HEARING

Application: RDR -
Joint Hearing
Date: 1/5/2018

NZSAA therefore supports the RDRML proposal to install a fish screen of appropriate design. However we have concerns relating to consent conditions on the fish screen construction, effectiveness, maintenance and compliance, as follows:

Reasons for Concern

- Compliance with the Water Conservation Order: retention of the natural character of the river and ensuring salmon passage.
- In keeping with the above statement, there is no information regarding the diurnal range of temperature, morning and evening, daily and yearly, for the Rangitata River, the fact being that temperature increase of the flow reduces the availability of oxygen. This has to be established before flow rates can be determined.
- The design has not been proven to be effective in NZ river conditions.
- The silting up of ponds to be constructed and management.
- The detrimental effects of flushing silty water into the river in potentially inappropriate conditions.
- Ongoing management of the fish screen.
- The proposed consent period of 35 years is too long.
- The 5 year implementation period is too long.

NZSAA seeks the following conditions to control and monitor the consents:

- Decline the extra 10 cumecs of water going into storage as this will affect the values in the Water Conservation Order.
- An approved testing, inspection and monitoring programme. It will be the installer's responsibility to ensure the screens continue to work. If not then consent will be suspended until that screen is working correctly.
- Adopt performance conditions requiring 100% efficient screens and effective fish by-pass, in accordance with NZSAA policy, namely
 1. All native fish, salmon and trout must remain in the river.
 2. Any fish that are removed from the river need to be returned to the river unharmed.
 3. Any fish harmed or not returned must be replaced.
- Temperature measuring should be installed to ensure that when the river water does exceed 19 degrees Celsius, which is critical to the survival of salmon. If it does, all takes except for stock and fire fighting will cease.

- The dissolved oxygen level must not fall below 9mg per litre. If it does, then all takes except for stock and fire fighting must cease. Again a measuring and monitoring system must be installed and monitored.
- Appropriate water flows and velocities in the RDR at all times for the effective operation of the fish screen and bypass.
- Written proof supplied within 12 months of commissioning that the screen is effective and excludes all fish.
- Management of debris and sediment so that it will not impede effective operation of the fish screen.
- Proof of correct disposal of silt so that sediment discharges will not discolour or affect the natural Rangitata River.
- Consent period maximum of 15 years with periodic reviews.
- Implementation period 1 year. Penalties for late completion and non-performance.

The Rangitata and other South Island salmon rivers are unique and their fisheries are internationally recognised and contributing to New Zealand's ecotourism industry.

NZSAA's very existence arises from our passion for the sport fishery and desire to retain this endangered fishery for our future generations to enjoy.

Our submission supports any improvement of the current fish passage constructions and regulations and urges appropriate resource consent conditions to ensure that the desired outcome is achieved.

Tony Humphreys

President

New Zealand Salmon Anglers Association Inc

April 2018



**Federation of Freshwater Anglers
PO Box 10580, Te Rapa
Hamilton 3210**

**021 02600437
president@nzffa.co.nz**

Tony Humphreys
NZ Salmon Anglers Association Inc

tonyhumphreys6@gmail.com

April 23rd 2018

Dear Tony,

The NZ Federation of Freshwater of Freshwater Anglers Inc wishes to unreservedly support the NZ Salmon Anglers Association Inc in its submission on the Rangitata Diversion Race fish screens.

The NZFFA sees the following points raised by NZSAA as universal in all freshwater anglers concerns about the recreational opportunities we wish to enjoy and leave and enhance for the generations that follow us.

1. Enforceable rules on nominated river flows
2. Relating extraction to the river water temperature and/or oxygen levels in order to maintain the viability of the river's ecosystems.
3. Creating fish screens that are effective without destroying the fish involved and returning them unharmed to the river concerned.
4. Pollution monitoring that is able to be reacted to immediately.
5. Enforcement and penalties relating to the operation of the fish screens that promote public confidence in the RDR management of this facility.

The NZFFA is happy for this letter to be tabled at the hearing relating to your association's submission on May 1.

Yours faithfully,

Graham Carter
President