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To: [Mailroom Mailbox](#)
Subject: Plan Change 7 to the LWRP Submission
Date: Sunday, 8 September 2019 11:42:38 AM

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Plan Change 7 to the LWRP Submission

Dear Sir

Submission on the inadequacy of Ecan's nitrate limits

The Canterbury Land and Water Regional Plan affects rivers and streams throughout our region. Environment Canterbury currently is considering possible changes to that Plan – notified as Proposed Plan Change 7 (or PC7).

I would like to bring your attention to a change proposed in PC7 that I consider would have serious consequences for sports fish and sports fishing.

It states:

Section- Habitat of Indigenous Freshwater Species Policy 4.102
*Structures enable the safe passage of indigenous fish, while avoiding as far as practicable, the passage of **any invasive, pest or nuisance fish** species by:*

The appropriate design, construction, installation and maintenance of new in-stream structures; and the modification, reconstruction or removed (sic) of existing in-stream structures.

I am gravely concerned that this policy, if adopted, would result in structures that enable the safe passage of "indigenous fish" but block the passage of valued sports fish.

As proposed, there is no definition in the plan or any higher order document that relates to "invasive, pest or nuisance fish species". However, the accompanying technical report is very clear in that in many cases, the intent is to exclude salmonids.

The policy would allow for new structures and the retrofitting of any existing structures to enable indigenous fish passage while avoiding/prohibiting the passage of species deemed to have adverse effects on native populations.

The heading "Habitat of Indigenous Freshwater Species" relates to a definition in the proposed plan that then links to a mapping layer where waterbodies are distinguished that would qualify under the proposed definition.

These waterbodies include (but are not limited to) a large number of easily accessible and highly valued recreational fisheries across the Canterbury Region. Including in the south: Lakes Benmore, Clearwater and Heron, sections of the upper Ahuriri River, tributaries of the Upper Rangitata River, and the Grays and Twizel rivers. And to the north: Lakes Coleridge, Pearson, and Taylor, and sections of the Rakaia, Selwyn, Hororata and Clarence rivers.

Whilst the policy is under the heading "Habitat of Indigenous Freshwater Species" and would seem to trigger these mapped waterways that are tied to the definition, it does not reference that term in the policy itself. Therefore, the policy could apply to any waterway throughout the entire region.

I consider that the policy does not give regard to section 7 RMA (habitat of trout and salmon), and interferes with Fish and Game NZ's functions under the Conservation Act (section 26Q), interferes with DOC's functions under the Conservation Act (section 6(ab)), is contrary to Water Conservation Orders where outstanding values are recognised and waters are protected for spawning and angling, is contrary to the Canterbury Regional Policy Statement where values such as fishing are recognised and contrary to the NZ Federation of Freshwater Anglers mandate to

I am supportive of providing for fish passage for valued freshwater species that includes indigenous fish as well as trout and salmon, but completely and unequivocally against this proposed plan.



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