

From: [Scott Pearson](#)
To: [Mailroom Mailbox](#)
Cc: [Emily Arthur-Moore](#); [Richard Cosgrove](#); [Angela Christensen](#); "scott@decisiontree.co.nz"
Subject: Plan Change 7 Submission NCFG
Date: Wednesday, 11 September 2019 8:51:48 AM

Dear ECan,

Please find enclosed North Canterbury Fish and Game's submission on Plan Change 7 and Plan Change 2. Please confirm receipt.

North Canterbury Fish and Game wishes to present this submission in person and may do so jointly with Central South Island Fish and Game.

Kind Regards

Scott

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SUBMISSION ON THE PROPOSED PLAN CHANGE 7

Prepared under the Resource Management Act 1991

To: Environment Canterbury
PO Box 345
Christchurch 8140

Name of Submitter: North Canterbury Fish and Game Council ("**Fish and Game**")

Address for service: North Canterbury Fish and Game Council
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This is a submission on the proposed Plan Change 7 "**PC7**" (as notified on 20 July 2019) of the Canterbury Land and Water Regional Plan (CLWRP).

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 wishes to be heard in support of this submission.

INTRODUCTION

ROLE OF FISH AND GAME

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

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

(b) 'to maintain and improve the sports fish and game resource-

(i) by maintaining and improving access

(c) 'to promote and educate-

(i) by promoting recreation based on sports fish and game

(e) 'in relation to planning-

(i)'to represent the interests and aspirations of anglers and hunters in the statutory planning process; and

(vii)'to advocate the interests of the Council, including its interests in habitats...'

Section 26Q, Conservation Act 1987.

In addition, Section 7(h) of the RMA states that all persons *'shall have particular regard to... the protection of the habitat of trout and salmon.'*

General Submission on Variation 1

Fish and Game has provided the following submission in relation to the proposed Plan Change 7 and the associated S.32 report.

Fish and Game has been actively involved in the Waimakariri Science Liaison Advisory Group, comprising a broad range of agencies and interested parties. Fish and Game has also attended various Waimakariri Zone Committee meetings and workshops.

In this submission, Fish and Game identifies the key plan provisions that are supported, as well as a number of the amendments we conditionally support or oppose in their current form, within the PC7 (c) Waimakariri sections of the plan.

For PC7 Part A (region-wide) proposed changes to the Canterbury Land and Water Regional Plan, North Canterbury Fish and Game has commented on Schedule 7, 7A, 8 and 17. For the remainder of Part A, we will adopt the submission of Central South Island Fish & Game with respect to the remaining amended provisions, and may present joint evidence at the hearing. We are generically supportive of the jurisdictional clarifications and amendments made in Plan Change 2, but beyond that are limiting our submission to PC7(c) matters.

This submission intends to give effect to the purpose of the Act, the National Policy Statement for Freshwater Management (NPSFM), the Canterbury Regional Policy Statement 2013 (CRPS), the vision and principles of the Canterbury Water Management Strategy (CWMS) and adequately address the significant water quality and quantity issues the Waimakariri Zone faces.

BACKGROUND

There are a number of waterbodies in the zone which have significance for Fish and Game, both for their recreational and amenity angling values and for their importance as spawning streams. The Ashley river is classified as a Regional Salmonid Fishery with iconic backcountry values. The gorge and upper tributaries of the Ashley also provide important spawning grounds for salmonid regeneration. In the Ashley catchment, Saltwater and Okuku rivers are classed as secondary spawning grounds with local salmonid fishery values.

Other waterbodies such as the Kaiapoi, Silverstream, Kaiapoi Lakes, Cust, Styx, and Cam are accessible local salmonid fisheries, with secondary spawning values. The Kaiapoi/Silverstream also have an important role supporting the Outstanding Waimakariri salmonid sports fishery. The proximity of these water bodies to Christchurch license holders and junior anglers adds weight to their value.

Like many other zones in Canterbury, the Waimakariri Zone has been subject to rapid land use changes, which when combined with the effects of climate change have seen widespread degradation in terms of water quality and flow issues; particularly over the last 25 years as the pace of land use intensification has increased.

PROPOSED CHANGES TO NATIONAL FRESHWATER POLICIES, STANDARDS AND LEGISLATION

At the time of writing this submission, the Government has just proposed significant new national directions under the Resource Management Act 1991 (RMA), in the form of a new National Policy Statement for Freshwater Management (NPS-FM), National Environmental Standards (NES) for Freshwater, Sources of Drinking Water, and Wastewater, and Section 360 regulations.

Under timeframes for the PC7 plan change process, it is likely the proposed changes above will need to be incorporated into PC7 in some form; particularly, through ECan's S.42a process. Fish and Game is strongly supportive for many of the proposed changes including those which provide greater protection for wetlands, riparian areas and associated waterbodies. Once finalised, the details on provisions and standards for matters such as ecological flows, minimum water course riparian setbacks and critical source area protection (general farming and winter grazing), stock exclusion and ecosystem health limits for water contaminants, will set compliance requirements on land and water plans in the short to medium term. We request that PC7 provisions are updated through this plan change process, to the furthest extent possible, to meet these new higher order document requirements.

Fish and Game will be presenting evidence that is supportive of the new national freshwater direction, in the PC7 context.

SUMMARY

Fish and Game recognises the complexity of challenges facing the Waimakariri Zone and the diverse range of values and stakeholders involved in this process. For PC7 we support the development of an integrated planning approach.

From Fish and Game's perspective, the Waimakariri Zone process has been one of the better collaborative processes we have seen, but there has still been a lot of tension between meeting the self-interested needs of the local catchments and the wider responsibility to maintain or enhance the environment as a "first order priority", under the The Canterbury Water Management Strategy.

The initiatives to cap existing water use, introduce improved ecological minimum flows, seek staged reductions in catchment Nitrogen concentrations, and provide more restrictive permitted activity rules in this Zone, are moving in a positive direction. The greater policy focus on wetlands, springs, riparian margins and stock exclusion is encouraging, although further extension into the rule framework for some of these matters is lacking, such as the width of riparian buffer strips.

The staged nutrient reductions do not appear to be supported by a sound catchment nutrient allocation mechanism in the plan, nor do the environmental flow and allocation limits go far enough or fast enough, to address the serious overallocation and contamination issues that exist.

The proposed monitoring and review process for PC7(c) is still reliant on a five year review cycle, which Fish and Game believes is too long and slow to adapt to dynamic environmental change. We therefore request some changes through this submission to not only safeguard the remaining freshwater values our license holders and the wider community cherish, but also to contribute to the delivery of a more effective sub-regional plan and wider-regional plan.

PC7 Part C Policies

1. Policy 8.4.5 Natural State Waterbodies – Support

Fish and Game supports preserving the current level of high water quality in these rivers by classifying them as "natural state water bodies". This clarification assists in the management of these waterbodies, by clearly indicating the expected level of management to maintain their current state.

2. Policies 8.4.6 to 8.4.9 - Support

Fish and Game supports the inclusion of these Tangata Whenua policies, given the number of shared freshwater values that can be maintained or enhanced through the implementation of these policies.

3. Policies 8.4.10 to 8.4.16 Abstraction of Water – Support

Fish & Game supports the intent of these policies and the logical environmental improvements they will create for sustainably managing water and other associated natural resources, including mahinga kai. The concept of transferring water takes from high environmental risk water sources to lower risk deep groundwater takes is supported, in conjunction with the proposed development of deep groundwater allocation limits. *Noting the important inter-relationships between surface, shallow and deeper catchment water sources.*

4. Policy 8.4.18 Transfer of Water Permits - Support with Amendment

The phasing out of over-allocation in these water bodies via this policy is supported, with the requested exception that clause b limits the transfer and associated surrender of water to 50% of "actual use" rate of take or "actual use" volume of water, determined as the average over the last 5 years. This revision would avoid the unintended consequence seen in the

Selwyn Te Waihora Zone, where transferred water permits can lead to increased total water use, in situations where the holder of the consent transfers or relinquishes the part of their consent they were not actually using.

Requested Relief

b. ...that 50% percent of the actual use rate of take or actual use volume of water proposed to be transferred is surrendered and not re-allocated, based on the average of the actual allowable take during the preceding five year period or part thereof.

5. **Policy 8.4.20 Targeted Stream Augmentation - Support**

8.4.20 is supported because it is important to protect the intended use of the augmented water.

6. **Policy 8.4.22 Efficient Use of Water - Support**

8.4.22 is supported because it encourages a “water balance” approach to be adopted, looking at both natural and human induced water inputs and outputs into the system. For example, significant reductions in groundwater levels were observed in the Hinds Catchment following the switch from border dyke irrigation to more efficient irrigation, alongside climatic changes and increasing groundwater abstraction.

7. **Policy 8.4.25 Nutrient Management – Support**

Fish and Game supports the intent of this policy to further restrict the areas of land and areas of winter grazing classed as permitted, and to require further reductions in accordance with Table 8-9, and associated stipulations in this policy. This policy will assist the Zone to address the present over-allocations and associated challenges, and avoid the situation potentially getting worse via the more permissive Plan Change 5 policies.

Fish and Game will be commenting separately on the appropriateness of the staged reductions in **Table 8-9**.

8. **Policy 8.4.28 and 8.4.28A – Support**

Fish and Game supports these additional policies to protect the Ashley Estuary (Te Aka Aka) and the Coastal Protection Zone. These areas provide important habitat for a diverse range of species.

9. **Policy 8.4.28B and 8.4.28C – Support with Amendment**

Support the use of these “equivalent loss rates” where the Portal is generating an erroneous number.

However, for 8.4.28C, the equivalent loss rate should only provide a “place holder” figure in the resource consent, without limiting the ability to immediately replace it with the intended Portal loss rate when it becomes available. This approach can simplify the process with much less time, cost and uncertainty for the individual consent holder and the consenting authority. It also reduces risks to the environment, that may occur with delays to updating revised resource consent loss rates.

A similar example is the updating of Overseer file information within a consent, as the latest version of Overseer is produced.

Relief Requested 8.4.28C

Where resource consent is granted for the use of land for a farming activity and that resource consent restricts the nitrogen loss rate from the farming activity to an Equivalent Baseline GMP Loss Rate or Equivalent Good Management Practice Loss Rate, impose conditions that enable a ~~review~~ the immediate replacement of the loss rate in that resource consent when the farm portal is able to generate a Baseline GMP Loss Rate or Good Management Practice Loss Rate for that farming activity.

10. Policy 8.4.30 and 8.4.31 Livestock Exclusion – Support

Support the extension of the region-wide stock exclusion rules by also applying them to the natural and human made features listed in clause (a) and (b) of 8.4.30 within the Waimakariri sub-region.

We also support protection of the Ngāi Tūāhuriri values listed in 8.4.31 through the additional requirements provided in clause (b) for stock exclusion of all farmed cattle, deer and pigs from the prescribed features in the Ashley-Waimakariri Plains Area.

11. Policy 8.4.32 Wetland and Riparian Margins – Support

Fish and Game supports the enabling of activities which can maintain, restore or enhance the values in this policy, including the significant habitats of trout and salmon. These activities will have a positive effect on the overall ecosystem health of both the water column and the wet or dry riparian habitat that surrounds these habitats.

12. Policy 8.4.33 – Support with Amendment

We support the intent of this restoration and enhancement policy, with the exception of some additional caution for the use of weed and pest control activities, where a blanket approach could be potentially more damaging. For example, blanket spraying may remove all riparian vegetation and ground cover including rank grass, that can provide important riparian protection in the interim, while new plant species are establishing.

Relief Sought

...indigenous biodiversity in wetland margins, targeted weed and pest control activities...

13. Policy 8.4.34 – Support

We recognise the high ecological values in the upper Ashley River/Rakahuri catchment, including Lees Valley and support the additional measures in this policy to protect them. Fish and Game has identified important salmonid spawning within these areas making them a significant component of this local and regional salmonid fishery. The upper parts of this catchment have already experienced significant habitat degradation, especially since the mid-90s, with large areas of wetland having been drained in Lees Valley. This land use change has significantly lowered the ability of the upper catchment to retain important water resources in order to release them slowly throughout the year and buffer against the negative effects of large rain events. Fish and Game has also witnessed poor stock exclusion

practices in areas such as Duck Creek, where significant sediment issues have been identified along with compliance action being required. This policy will help to maintain and enhance water quality in the upper catchment.

14. **Policy 8.4.35 Current Monitoring and Review – Oppose in current form**

While Fish and Game encourages environmental monitoring and review initiatives, this policy with its five year reporting cycle is too infrequent for the dynamic nature of climate and land use change in this Zone. Instead an annual frequency is required, with the increased ability to guide any adaptive management interventions. Such interventions would help to ensure adequate progress is being made toward medium and long term plan targets, outcomes and limits.

Relief Requested

Inform ~~successive plan~~ annual review cycles by reporting every year ~~5 years~~ on:

d. progress made toward freshwater outcomes and limits, including an assessment of the effectiveness of the framework, (including any non-statutory actions) in achieving those outcomes and limits, and recommending any adaptive management interventions required where inadequate progress is being made due to severe climatic or land use change variables, that significantly threaten achievement of the targets, outcomes and limits set in the plan.

15. **Policy 8.4.36 Consent Expiry and Duration – Support with Amendment**

Consent reviews can be difficult and cumbersome to implement and that is why we would support the approach to common expiry dates in this policy. However, given the significant measures required to achieve freshwater outcomes and limits in this zone, earlier common review dates are required. The current timeframes are considered overly generous and encourage the tendency in many parts of this plan to put off or delay the inevitable step-changes needed to make significant progress.

While Fish and Game acknowledges the potential economic and social impacts outlined in the S.32 report, we consider earlier common expiry dates are necessary to align with some of the key plan outcome and limit dates proposed in this plan. For example, the 2032 minimum flow dates or the 2030 staged nitrogen loss reductions. An earlier common review period is particularly relevant for consent holders in the Nitrate Priority Area.

Relief Requested

- a. 1 July ~~2037~~ 2032
- b. 1 July ~~2037~~ 2032
- c. 1 July ~~2037~~ 2032
- d. 1 July ~~2047~~ 2040

16. **Policy 8.4.37 – Support with Amendment**

Fish and Game supports the inclusion of the 10 year resource consent durations in this policy, but more importantly in our view, is the need to also introduce adaptive management conditions into these consents that are coupled with the revised monitoring

and review cycles proposed by Fish and Game in Policy 8.4.35. This introduction would allow more adaptive interventions during plan cycles, to respond to “severe” climatic or other land use change variables that “significantly” threaten achievement of the targets, outcomes and limits set in the plan.

For example, the three year severe drought cycle experienced in Canterbury between 2013 and 2016, required a faster adaptive response than the current five to ten year planning cycles allow. In that time, significant environmental degradation occurred, with limited ability for the regional authority to adaptively manage the more extreme situation; given the static nature of resource consents and the difficulty reviewing them. This situation can lead to environmental, social and financial costs being borne by the wider Community from delayed intervention.

Relief Requested

Apply the following durations to any resource consent granted after the relevant common expiry date in Policy 8.4.36 and enable the inclusion of adaptive management conditions into these consents to allow for required interventions, in line with the monitoring review cycle in 8.4.35 for severe climatic or land use change variation, that significantly threatens achievement of the outcomes and limits set in the plan.

17. Policy 8.4.38 – Support with Amendment

Fish and Game supports the consent reviews of all high or direct depleting surface water or stream depleting groundwater permits in the Freshwater Management Units listed in clauses (a) and (b) of this policy. We would also request the inclusion of adaptive management conditions into these consents, to enable management interventions for “severe” climatic or other land use change variables that “significantly” threaten achievement of the outcomes and limits set in the plan.

Requested Relief

Insert an additional clause (c) as follows:

c. enable the inclusion of adaptive management conditions into these consents to allow any required interventions, in line with the monitoring review cycle in 8.4.35 for severe climatic or land use change variables that significantly threaten achievement of the outcomes and limits set in the plan.

Rules

18. Rule 8.5.1 – Damming of the Ashley River/Rakahuri

Support the prohibition of damming of the mainstem of the Ashley/Rakahuri, in the locations prescribed in this rule. These areas afford significant recreational and amenity values to the community, alongside many other significant environmental values.

19. **Rule 8.5.9 Take and Use Surface Water – Support with Amendment**

Support the intent of this rule with the following inclusion to also protect significant habitats of trout and salmon as per Part 7 of the RMA.

Requested Relief

The exercise of discretion is restricted to the following matters:

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

20. **Rule 8.5.12 – Support**

Support the intent of this rule to replace existing high risk water permits with those taking water from areas or depths with less negative environmental impact.

21. **Rule 8.5.17 – Transfer of Water Permits - Support with Amendment**

As per policy 8.4.18 above.

Requested Relief

In over-allocated surface water allocation zones, 50 percent of the actual use rate of take or actual use volume of water to be transferred is surrendered...

22. **Rule 8.5.23A to 8.5.23C – Nutrient Management - Conditional Support**

Support these policies and the use of the Equivalent Loss Rates, while the Farm Portal is unable to update and immediately replace the loss figure in the resource consent; as per the conditional support and requested relief in Policy 8.4.28C above.

23. **Rule 8.5.9 - Support**

Fish and Game supports this rule and the additional permitted activity restrictions in clauses 1 to 4, as a means to better protect against nutrient discharges. The potential for unintended negative environmental effects is significant in this zone without these additional restrictions on permitted land use activities.

24. **Rule 8.5.33 - Stock Exclusion – Support**

Support the additional provisions in this rule, beyond the wider-regional plan rules, in the interests of providing better protection against nutrient discharges from these other potential loss areas.

25. **Rule 8.5.35 and 8.5.36 – Habitat Enhancement – Support with Amendment**

We support this permitted activity rule and the provisions designed to protect these important freshwater habitats from potentially damaging maintenance or enhancement works, with the inclusion of the amendment proposed below.

Requested Relief

8.5.36

1. The actual and potential adverse environmental effects of not meeting the condition or conditions of Rule 8.5.35; and
2. Any actual or potential positive environmental effects, despite not meeting the condition or conditions of Rule 8.5.35.

26. Rule 8.5.37 and 8.5.38 - Structures – Support

Support this permitted activity rule and associated conditions in the interests of allowing Fish and Game to carry out its statutory obligations in managing, maintaining and enhancing sports fish and gamebirds in Canterbury.

27. Freshwater Outcome Tables 8.6 – Support with Amendments

The inclusion of Table 8a Freshwater Outcomes for Waimakariri Sub-region rivers and Table 8b Freshwater Outcomes for Waimakariri Sub-region lakes is generically supported for this plan.

Requested Relief

Fish and Game wish to see a lower 'chlorophyll a' outcome of ~~200~~ 120 set for hill-fed lower and spring-fed plains rivers.

In Table 1a Freshwater Outcomes for Canterbury Rivers:

- i) Hill fed Lower – Urban 4.0 QMCI score be deleted and replaced with 5.0 QMCI.
- ii) Specify in Suitability for Contact Recreation “good to fair” for all management units with “no set value”, including spring fed plains.
- iii) Specify in Suitability for Contact Recreation “good” for all management units with “good to fair”
- iv) Specify in Suitability for Contact Recreation “good to fair” for all management units with “fair”.
- v) Adjust the corresponding Ecoli values.

In Table 1b Freshwater Outcomes for Canterbury Lakes:

Specify in Suitability for Contact Recreation “good” for management unit Coastal lakes with corresponding Ecoli values.

28. Allocation Limits and Water Quality Limits 8.7 – Oppose

The environmental flow and allocation limits in Tables 8-1 and 8-2 have been through an intensive process of analysis to understand the pros and cons of various flow and allocation regimes, including input from an expert ecological panel, for which Fish and Game was a party. While there have obviously been some compromises struck within the Zone Committee, Fish and Game is very concerned about some of the rivers and the loss of values that will occur or continue to occur, if the proposed changes in their current form are accepted. The following examples demonstrate some of our concerns:

- Ashley/Rakahuri – While the B block allocation limit has been reduced from 500 to 135 l/s, the A block does not show any tangible step-change improvement between 2019 and 2032, which is what this river really needs in order to be considered as a healthy rather than an intermittent flowing river in warmer periods, with regular fish salvages required. The drainage of wetlands in the Lees Valley has significantly affected the river, along with climate change and irrigation abstraction. To offset present over-allocation, some further significant claw back is required.
- The Waikuku River will continue to be over-allocated by 202 l/s under the proposed regime, with the minimum flow of 150 l/s for 7 days being an improvement, but still well short of a healthy ecological flow. Rather than capping this river at existing use, it would be preferable to see some phasing out of the overallocation by 2032 and a higher minimum flow by that time.
- Saltwater Creek is classified as a secondary salmonid spawning stream by Fish and Game and also has value for indigenous fish species, yet we note the current minimum flow is being reduced by 50 l/s and only raised back to this level in 2032.
- The Cust River will stay in a severely degraded state if the minimum flow level continues at 20 l/s (providing only 18% of habitat for juvenile trout) and fish strandings/deaths will be common over the summer. The 60 l/s (2027) is still not sufficient when compared to the preferred ecological minimum flow of 150 l/s.
- The Kaiapoi River is an important regional fishery for Fish and Game and maintaining fish passage for salmon is considered essential for supporting the nationally significant Waimakariri fishery (the largest recreational salmon fishery in New Zealand). The current minimum flow of 600 l/s is below the 900 l/s necessary for salmon passage. More information is required about the proposed minimum flow for the Kaiapoi River.

29. **Environmental Flow and Allocation Limits for Mahinga Kai Enhancement Purposes**
Table 8-3 – Support

Fish and Game is supportive of the mahinga kai flow and allocation limits as a further tool to improve freshwater management and to maintain or enhance mahinga kai and other associated freshwater values. These allocations for the Cam/Ruataniwha and Silverstream rivers can be factored into the overall improvements proposed for these rivers; on the assumption they will create positive mahinga kai and ecosystem health improvements for these waterbodies.

30. **Groundwater Table 8-4 – Support with Amendments**

While Fish and Game is supportive of the move to transfer shallow surface water and shallow groundwater takes to deeper groundwater, we believe that further claw back is required over time in the over-allocated zones. Deep groundwater is still connected to upper aquifers and can significantly influence surface water losses when deep groundwater levels also drop. Selwyn Te Waihora provided a graphic example of this situation occurring during the 2013-16 drought period, with the Selwyn River being consistently affected by very low flows at Coe’s Ford and the associated lowering of both shallow and deep ground water.

A staged reduction in groundwater use is necessary to reduce overallocation (as required by the NPSFM) and to help offset the reduced losses to groundwater from improved irrigation efficiency. A staged reduction of at least 10% by 2027 and a further 10% reduction by 2032 is requested in overallocated zones, to begin restoring a healthy water balance equilibrium in the Zone.

31. **Catchment Water Quality Limits Table 8-5, 8-9, 8.8 and 8.9**

The Zone Committee has taken a number of steps toward reducing the current and projected Nitrate-nitrogen levels in the Waimakariri Zone. Table 8-5 has a wide spectrum of nitrogen toxicity levels across these rivers. The use of toxicity limits can be a blunt tool and for this reason Fish and Game will be seeking at least a 30% precautionary reduction in the N mg/l limits shown, to more precisely indicate the desired level of change required, to improve where degraded, or to more adequately safeguard the life supporting capacity and ecosystem processes in these water bodies. We note some of the N limits are set well above the recommended COMAR levels and we question whether this level of compromise is appropriate.

For the Northern Waimakariri Tributaries the Nitrate-Nitrogen targets and limits (annual medians mg/l and annual 95 percentiles) are, with the exception of the Cam, set at very high toxicity levels and reflective of the current degraded state of these waterbodies. Fish and Game will be seeking greater step-change reductions for the majority of these rivers or drains, in order to reduce the current degradation over time and enable a greater focus on ecosystem health requirements and the overall achievement of healthy waterbodies in the zone. The 2080 date (see fine print in the table) makes the proposed improvements very conservative, and does not adequately take into account the relative carrying capacity of this zone to absorb current and projected nutrient discharges; or in fact recover to an overall healthy level, across the wider spectrum of community values which exist.

Fish and Game is also concerned with some of the high Phosphorus limits in Table 8-5, particularly those for spring-fed streams which are over 0.01 mg/l DRP. Limits over this amount should be reduced or at least set at a "target" of 0.01 mg/l DRP.

The lack of a catchment nutrient allocation mechanism using either modelled farm loads or in-river loads, is of concern. Without these higher level tools, the accuracy of monitoring against nutrient river concentrations becomes more difficult. We question how future nutrient consent allocations will be effectively managed without at least one of these tools and seek to have selected six year rolling average in-river loads included in Table 8-9, as indicators for achieving the scheduled Nitrogen reductions, as well as for showing improvements in Phosphorus reduction initiatives in the catchment.

The intent of the proposed nitrogen loss reductions in Table 8-9 is to be commended; however, Fish and Game is concerned that too much of the work required is being pushed back on future generations. We seek the following changes to this table in order to front foot the improvements required:

Dairy sub-areas A-E 15% reduction by ~~2030~~ 2027
Dairy sub-areas A-E 30% reduction by ~~2040~~ 2032
All other sub-areas A to E 5% by ~~2030~~ 2027
All other sub-areas A to E 10% by ~~2040~~ 2032

We would also seek the proposed improvements for 2050 and beyond to be brought forward by ten years respectively.

Tables 8.8 and 8.9 are both supported, given they recognise the sensitivity and special values of these two water bodies.

Schedules

32. **Schedule 7 – Farm Environment Plan – Conditional Support**

Fish and Game is supportive of the proposed amendments to Schedule 7, including the inclusion of springs (as a waterbody) under the Farm Environment Plan definitions and Management Area 5E.

The additional requirements for the Waimakariri sub-region (10) are conditionally supported, including the staged nitrogen reduction objectives (subject to Fish and Game's additional relief requested for Table 8-9), along with the targets and associated threshold criteria.

33. **Schedule 7A – Management Plan for Farming Activities**

Support the inclusion of springs and any artificial watercourses under Part B 2(c). The protection of these features can make a significant contribution in minimising the effects of land use on freshwater ecosystems.

34. **Schedule 8 – Region Wide Water Quality Limits**

Support the inclusion of Dissolved Oxygen and Ammonia Nitrogen concentrations in this schedule.

35. **Schedule 17 – Salmon Spawning Sites**

Fish and Game has been directly involved in updating the salmon spawning sites in the North Canterbury Fish and Game region. The proposed additions fill in several gaps that existed in this schedule and will provide important protection for the salmon sports fishery; which is currently under significant environmental pressure.

Sincerely



Scott Pearson
North Canterbury Fish and Game Council
Environmental Advisor

04.09.2019