

From: [Joel Sadler](#)
To: [Mailroom Mailbox](#)
Subject: Re: Plan Change 7 to the LWRP Submission
Date: Thursday, 12 September 2019 11:35:16 AM

To Whom it May Concern,

I am writing to express my concern over Environment Canterbury's current consideration of 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 consequences for sports fish —if it withstands the hearing process and is recommended by the hearing panel in a decision. 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 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 to many fishers throughout our magnificent country and abroad.

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.

The ambiguity of the considered changes appears to not give regard to section 7 RMA

(habitat of trout and salmon), interferes with Fish and Game'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, and contrary to the Canterbury Regional Policy Statement where values such as fishing are recognized. It may even be in breach of the Treaty of Waitangi, which is partially in place for the protection of original and/or introduced "Toanga" (fish living in New Zealand) for both Maori and non-Maori.

Trout and Salmon are highly prized by both Maori and Non-Maori residents as well as a renowned part of our tourism offering and global perception.

I encourage you to protect all species of fish within our rivers and plan any infrastructure changes accordingly.

Kind Regards,

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