

**Submission on Plan Change 7 to the Canterbury Land and Water Regional Plan**

By **Save the Rivers Mid-Canterbury Inc**

Submitter Identification number: **PC7-535**

Wishes to be heard: **Yes**

Would consider making a joint submission at the hearing: **Yes**

Submitted on: **10/09/2019**

This submission was submitted via Environment Canterbury's online submission portal. The Submissions portal generates pdf files of submissions (as attached). However, some of the information that appears in the pdf files is not consistent with information the submitter entered into the portal, specifically, where submitters have ticked:

- "I wish to be heard in support of my submission" ; and
- "If others make a similar submission I will consider presenting a joint case with them at a hearing".

Additionally, the submissions portal has generated submitter and submission point numbers that are not consistent with the numbering applied in the Summary of Decisions Requested. Submission points in the Summary of Decisions Requested (SODR) are numbered using the following format:

PC7 – Submitter ID #.Submission point #

**The correct submitter identification number and submitter information is specified above. This will be the number referred to in the SODR.**

# Proposed Plan Change 7 to the Land and Water Regional Plan

## Form 5 Submission on publically notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To Environment Canterbury - Tavisha Fernando  
Date received 10/09/2019 4:41:58 PM  
Submission #59

### Address for service:

Save the Rivers Mid-Canterbury Inc - Keith Gunn / 59  
58 Carters Road Allenton Ashburton  
Mobile: 0210626137  
Email: savetheriversnz@gmail.com  
Wishes to be heard? No  
Is willing to present a joint case? No

**Proposed Plan Change 7 has been developed to respond to emerging resource management issues, to give effect to relevant national direction, to implement recommendations from the Hinds Drains' Working Party, and to implement recommendations in the Waimakariri and Orari-Temuka-Opihi-Pareora (OTOP) Zone Implementation Programme Addenda (ZIPA).**

- Could you gain an advantage in trade competition in making this submission?
  - No
- Are you directly affected by an effect of the subject matter of the submission that
  - (a) adversely affects the environment; and
  - (b) does not relate to trade competition or the effects of trade competition
  - Yes

## Submission points

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### Point 59.1

#### Submission

**Save the Rivers Mid-Canterbury Inc. strongly oppose policy 4.102** in the "Habitat of Indigenous Species" section of Plan Change 7, namely:

*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:*

- a. the appropriate design, construction, installation and maintenance of new in-stream structures; and*
- b. the modification, reconstruction or removed of existing in-stream structures.*

Save the Rivers strongly oppose policy 4.102 for the following reasons:

There appears to be no glossary, or definition, in either of the documents "Proposed Plan Change 7 to the Canterbury Land and Water Regional Plan" or "Section 32 Evaluation Report for Plan Change 7 (Omnibus, Orari-Temuka-Opihi-Pareora and Waimakariri) to the Canterbury Land and Water Regional Plan and Plan Change 2 to the Waimakariri River Regional Plan" of the species described in policy 4.102 as *invasive, pest or nuisance fish species*. Most people would consider those labels would be for carp or similar species but in the absence of a precise definition it is possible for it to include our sports fish. If the description was to include either salmon and or trout then our strong opposition to the policy is because:

- It has the potential to adversely affect our sports fishery by restricting their spawning areas. Our salmon and trout fisheries are greatly valued for many reasons. Having these fisheries contributes to the social and mental well being of us as New Zealanders and an attraction for overseas visitors. It has been well documented that these fisheries are under pressure with the salmon fishery being described as currently in a "critical state".
- The decline in both the sports fisheries and the abundance of indigenous fish has happened together and for the same reason. Some of our members remember when there were huge quantities of both sports fish and indigenous species coexisting together with the relative numbers of each changing in a cyclical way. What has depleted indigenous fish numbers has also depleted salmon and trout numbers.
- Habitat loss, by the draining of wetlands, the pollution in our waterways and over abstraction, has impacted on all fish populations and we are supportive of that derogation being reversed along with effective fish screening on all irrigation intakes and ensuring flows are such that river mouths are kept open.
- It is in direct conflict with Conservation Order requirements for the Rangitata and Rakaia rivers that identify those rivers

having outstanding salmon and trout fisheries and spawning areas. As noted in 2.4.2. Water Conservation Orders Under section 67(4)(a) of the RMA, PC7 must not be inconsistent with any Water Conservation Order.

- It is in direct conflict with the function of Central South Island Fish and Game and North Canterbury Fish and Game under the Conservation Act, (26Q). As noted in 2.4.6. Sports Fish and Game Management Plans The Conservation Act 1987 requires each Fish and Game Council to prepare any sports fish and game management plans that are necessary for the management of sports fish and game birds within its region of jurisdiction, for approval by the Minister of Conservation.

### Relief sought

Delete ALL of 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:~~

- ~~a. the appropriate design, construction, installation and maintenance of new in-stream structures; and  
b. the modification, reconstruction or removed of existing in-stream structures.~~

**Section:** Section 4 Policies

**Sub-section:** Section 4 Policies

**Provision**

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:

- a. the appropriate design, construction, installation and maintenance of new in-stream structures; and  
b. the modification, reconstruction or removed of existing in-stream structures.