

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

By **New Zealand Salmon Anglers Association**

Submitter Identification number: **PC7-542**

Wishes to be heard: **Yes**

Would consider making a joint submission at the hearing: **No**

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 4:06:33 PM  
Submission #66

### Address for service:

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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 66.1

#### Submission

The proposal to restrict passage of what are called "invasive species" can only apply to one that for some reason is not mentioned by name and as Salmon are having spawning sites protected it can only apply to trout. However trout are the least problem for indigenous fish. and restricting passage to them would also restrict passage to salmon. What needs to be done for indigenous fish is to fix the following.

1. The amount of water being removed from rivers.
2. The restoring of wetland spawning areas.
3. Restricting the fluctuations of hydro flows as that dewater the side braids indigenous fish use for moving up and down rivers.
4. Making sure fish screens on irrigation and stock water races work
5. Making sure fish screen bypasses actually work.
6. Address the massive silting of the rivers especially from flushing of sediment ponds.
7. Closing down water takes when river temperatures exceed 19 degrees Celsius.

By restricting fish passage on some of the proposed areas it will greatly impinge on some of the most popular recreational areas in the Ecan district not the least is the 425,000 freshwater angler days that happen every year. ( NIWA Freshwater Angler Survey 2014)

#### Relief sought

Policy 4.102 Structures to enable safe passage of indigenous fish, while avoiding as far as practicable, the passage of any invasive, or nuisance fish species: The appropriate design, construction, installation and maintenance of new in-stream structures and the modification, reconstruction or the removed (sic) of existing in-stream structures.

**Section:** Section 4 Policies

**Sub-section:** Section 4 Policies

**Provision**

**Habitat of Indigenous Freshwater Species**