

Central Plains Water Proposal: Concerns of the North Canterbury Fish and Game Council

Background

The North Canterbury Fish and Game Council have a number of concerns with the Central Plains Water proposal. These relate to the following:

- Exclusion of environmental representatives from the steering committee
- Consultation method
- Abstraction from the Kowai River during flow restrictions
- Effects on the Waimakariri salmon fishery
- Effects of land intensification

This handout provides an overview of the Fish and Game Council and information on the values of the Waimakariri River fishery. It is the view of the Council that the Waimakariri, in particular will be adversely affected if the proposal proceeds. The Rakaia River National Conservation Order ensures greater protection of the Rakaia compared with the Waimakariri.

The Fish and Game Council

The North Canterbury Fish & Game Council represents license holders from the South Bank of the Rakaia River up to the Waiau River catchment in the North and the East Coast to the Southern Alps. The area is 19,552km², containing 40 major high country lakes and five low country lakes.

Our purpose is to manage the sports fish and game bird resource on behalf of the Crown for the public of New Zealand. This involves advocacy for the protection and sustainability of fish and game habitat.

The Waimakariri River Resource

The Waimakariri River supports an extensive range of aquatic habitats, ranging from the pristine based alpine streams in the mountain areas of the Southern Alps, to estuarine areas in its lower reaches. These habitats support an extensive range of fish fauna, with 29 species reported in the Waimakariri River (Eldon & Kelly, 1985). Chinook salmon, brown and rainbow trout are the main sports fish species found in the Waimakariri River.

The Waimakariri represents one of the most popular recreational rivers in New Zealand. Salmon and trout angling are extremely popular in the River and its tributaries. The accessibility of the Waimakariri to Christchurch and numerous townships makes it a popular destination for a variety of anglers. The Waimakariri salmon fishery is considered to be of national significance and the trout fishery of at least regional significance (Teirney, Richardson and Unwin, 1987). The relative recreational value of salmon as a sports fish is

reflected in the fact that six out of ten of New Zealand's most popular fishing rivers have significant runs of salmon.

The northern tributaries of the Waimakariri, such as the Ohoka, Kaiapoi and the Cust River, are important spawning and juvenile rearing habitats for brown trout. These fish enter the upper margins of these waterways to spawn in the period between April and July of each year, with the ova developing in their gravel redds (egg sites) through till September.

The popularity of the Waimakariri River and tributaries as a fishery destination for anglers has been attributed to the following factors:

- The proximity and accessibility of the catchment to large urban centres;
- Large annual runs of Chinook salmon;
- The variety of angling opportunities on offer in the catchment, including spin, fly and bait fishing;
- The availability of large areas of fishable water;
- The presence of well known and productive fishing holes (Teirney et. al).

The *1994-1995 National Angler Survey*, a comprehensive survey that measured the level of fishing effort on different water bodies throughout New Zealand, demonstrated that 46% of angler effort has been concentrated within the Waimakariri catchment, with 36% being on the mainstem of the River itself (NIWA, 1995).

Concerns with Central Plains Water

As noted, the Council and its members have a number of concerns with the CPW proposal. These are outlined below:

Lack of representation

The Council had initial concerns with the processing of the CPW proposal due to lack of representation of an environmental position on the steering committee. Despite requests to join the committee, the Council was refused. In contrast, farmers and irrigators were granted a place on the committee. The Council believes this represents an imbalance as representation was only given to individuals presenting economic values, and not ecological or social as is required by the Resource Management Act 1991 (RMA).

Along with the Department of Conservation, Forest & Bird, and Ngai Tahu, the Council was permitted to join a consultative working party. Due to time restrictions at meetings and the heavy weighting of agricultural representatives in favour of the scheme, it proved difficult to get the most out of this consultative approach. It did however, prove effective to develop a sub-group where environmental impacts were discussed. Unfortunately, our concerns had little bearing on the steering committee. In particular the sub-group recommended an investigation to assess sustainable approaches to farming in Canterbury where agriculture works within the current environmental conditions rather than re-invent the climate and catchment conditions using unsustainable irrigation. This was dismissed.

Impacts of taking water

The salmon fishery of the Waimakariri River will be significantly affected by CPW. This has implications for angling and Canterbury's recreational fishing industry.

Salmon fishing in Canterbury has been in decline for the past few years. While it is not possible to pinpoint the sole cause it is evident that dewatering of rivers, lowland streams and the impacts of agricultural land-use have significantly affected the salmon and trout fishery. Dewatering of the Waimakariri River will have a significant impact of the salmon habitat, amenity values and recreational values. Putting further pressure on this resource through increased irrigation is inconsistent with the purpose of the Resource Management Act 1991.

The Council regards the flow regime on the Waimakariri River as too low. The regional council disregarded evidence presented at the time these flows were set. Consequently, the Waimakariri River faces the greatest threat from this proposal. The low flows resulting from the CPW abstraction will affect amenity values and make angling difficult, and at times impossible.

Low flow is not a new issue for the Waimakariri. Evidence presented at the Waimakariri River Resources Plan (WRRP) hearing concluded that salmon are highly vulnerable to low flows. Scientific evidence presented at the hearing showed that when the flow regime is too low, or less than 50 cumecs, migration can be obstructed. The significance of effects on salmon migration are noted in evidence from Gordon Glova written in 2000:

“salmon do not feed from the time they arrive inshore and have finite body reserves, delays in migration lessen their chances of completing migration to headwater areas to successfully mate and spawn.”

At a recent public meeting regional council staff acknowledged that the flow regime of the Waimakariri is too low to sustain a proposal such as Central Plains Water. The Regional Planning Manager, John Glennie noted:

“CPW was not something that was contemplated at the time...we've possibly got a scheme taking water at a time that water would not normally be taken.”

Declines in salmon will have a significant impact on angling. As catch rates decline the total angler experience will diminish, this in turn has impacts on recreational angling across the region due to impacts on licence sales, equipment sales and jobs.

Springfield / Sheffield irrigation

The proposal to take water from the Kowai River when the River is on flow restriction contravenes the RMA.

The Kowai is a prime example of a river under pressure from over allocation and consequently a fishery that has declined. The Kowai once supported a locally significant trout population before the River declined through continuous dewatering and land-use.

An 8km stretch of the Waimakariri will be dewatered with significant impacts on that area of habitat. The Council maintains that the Springfield / Sheffield option should not form part of the proposal.

Land intensification

The impacts on ecological, recreational, social and amenity values spread wider than the Central Canterbury Plains due to the secondary impacts on lowland streams, Te Waihora and the Avon-Heathcote estuary.

The land intensification debate is not new. The impacts of land intensification include increased contamination of surface and ground waters. Declining water quality and declining trout and salmon populations reflect the impact agriculture continues to have in Canterbury. The steering committee acknowledges that the scheme will exacerbate these effects.

Agricultural impacts have occurred internationally and nationally, they are difficult to control and more difficult to remedy after the event. It is the view of the Council that the ecological integrity of Canterbury is at stake due to the increased nitrate, sediment, fertiliser and pesticide loading that CPW will bring.

What are the answers?

Fish and Game discourage the Council from allocating further funding to feasibility studies.

Initial funding was granted for a feasibility study. As initial investigations highlight that significant impacts on the salmon fishery cannot be avoided the project should be abandoned.

Despite Councilor O'Rourke's insistence that an Assessment of Environmental Effects (AEE) has not been produced, this is not factual. URS and Lincoln Environmental submitted an *AEE for Waimakariri and Rakaia River Water Takes* on behalf of Christchurch City Council and Selwyn District Council in December 2001. This AEE accompanied the aforementioned groups resource consent application sent to the regional council.

If the money is to be granted Fish and Game wish to see a number of conditions imposed on the study. The Council asks the Committee to consider these in making its recommendation:

1. The effects on the Waimakariri are problematic due to the WRRP. Fish and Game fail to see how the effects on the salmon fishery and angling can be abated without setting higher flows or reducing the proposed take.
 - We propose that, subject to further funding being granted, a lower take option be investigated.
2. The proposal to take from the Kowai and top-up with lower quality from the reservoir is unacceptable and contravenes the RMA.
 - We propose that the Kowai investigations be abandoned
3. The steering committee has reiterated the positive impacts due to lower demands on ground water. This will only occur if ground water takes cease and are replaced with the irrigation scheme supply.

- We propose that all groundwater consents be surrendered by individuals partaking in the scheme
- 4. The scheme proposes that open water races will convey the irrigation water. This is recognised as an inefficient and ineffective means of conveying waters.
- The Council believes that funding should not be given unless the steering committee is willing to use piped systems that will improve efficiency.
- 5. Land intensification will result in numerous adverse effects on Canterbury's water bodies. The Council maintains that some of these can be managed through a well-structured, audited environmental management system. Such a system should set policies and objectives pertaining to continuous improvement.
- If the scheme is approved, a condition be imposed on irrigators to implement an environmental management system applied to individual farms and their operations.

Overview

The Fish and Game Council are not adverse to irrigation per se. Our stance on any development project is that the integrity of ecological, recreational and amenity values must be maintained and enhanced. Water storage is, in some forms more agreeable than surface or groundwater abstraction. However, as little attempt has been made to avoid the impacts discussed above, we question the validity of granting more money to the scheme investigations.

We are also supportive of public consultation but experience has shown that consultation is often little more than a token gesture and the views and opinions of interested and affected parties are overridden by economic drive.

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