

SUBMISSION ON APPLICATION FOR RESOURCE CONSENT UNDER SECTION 96 OF THE RESOURCE MANAGEMENT ACT 1991.

To: Environment Canterbury, Hearing Commissioners.

Name: Keith William Briden,
Recreational user of the Waimakariri and Rakia rivers.

This is a brief summary of my original submission dated 10 August 2007, I will give a presentation to the hearing commissioners on 11 August 2008.

The Waimakariri river is the most important whitebait fishery in Canterbury. The extraction of water by the Central Plains water Trust will impact on:

- The ecology and habitat of both juvenile and adult whitebait species,
- The physical cultural and social values of many Canterbury white baiters, and,
- The economic benefits of a fishery valued at several million dollars.

I have read the Central Plains application and find an array of highly qualified experts have completely missed any consideration of the whitebait fishery. Only one expert, Taylor, mentions that white baiting is an important activity in spring. There is no analysis by this expert on the impacts the scheme will have.

I conclude there has been no planned or actual consultation with white baiters. Therefore concerns of white baiters have been ignored. Ways to avoid remedy or mitigate the impacts of the water extraction on the whitebait fishery and habitat have therefore not been considered.

I find this to be a serious oversight and therefore ask you to decline the applications to extract water from the Waimakariri and Rakia rivers.

Apart from the whitebait fishery and habitat there are many other impacts that have not been considered (See my full submission - attached). There has been no consultation or identification of ways to avoid remedy or mitigate a range of ecological, social, and economic impacts.

Dated at Christchurch 2nd day of August 2008

Keith William Briden

**SUBMISSION ON APPLICATION FOR RESOURCE CONSENT UNDER
SECTION 96 OF THE RESOURCE MANAGEMENT ACT 1991**

TO: ENVIRONMENT CANTERBURY

NAME: Keith William Briden
Recreational User of the Waimakariri and Rakia Rivers

ADDRESS: 87 b Taylors Mistake Road
Sumner
CHRISTCHURCH

Ph 03 326 5958

STATEMENT OF SUBMISSION:

Pursuant to section 96 of the Resource Management Act 1991. I Keith William Briden, recreational user of the Waimakariri and Rakia rivers, make the following submission

1 I oppose the Resource Consent applications made by the Central Plains Water Trust, and jointly Central Plains Water Trust and Ashburton Community Water Trust: crc061941 crc061943 crc061972 crc061940 crc021091, crc061973

2 The reasons for opposing the application are:

2.1 Effects on Native Fisheries will be detrimental

2.1.1 Whitebait Fishery.

The Waimakariri River is the most important whitebait fishery in Canterbury. The whitebait season runs from 15 August to 30 November. Juvenile whitebait return during spring and grow into adult fish. In autumn they lay eggs on riverside vegetation. A month later eggs flow out to sea. Water quality and quantity affect how many whitebait migrate back into the river system. No time of the year is a good time to take an additional 40 cumecs of water from this river. Whitebait runs are primarily related to the quantity of water flowing out of the river mouth (RM Mc Dowell, The New Zealand Whitebait Book). The seasons best whitebait runs are after a fresh when the river drops from 200 cumecs to around 40 cumecs. The removal of 40 cumecs of precious whitebait water will diminish the quantity of whitebait caught and the quality of the whitebaiting recreational experience. I believe

the removal of water during the whitebait season will diminish whitebait catches.

Whitebaiting at the Waimakariri is enjoyed by an estimated 1,000 – 2,000 people each year.

The whitebait fishery is good for the health and wellbeing of many people. On average I will catch 30kg of whitebait per season. Many fishers catch considerably more than this and others considerably less ! In a good season set netters at the river mouth can catch 500kg of whitebait. A number of whitebaiters are commercial and sell their catch. I consider 25kg would be an average person's season catch. I estimate the annual catch to be around 25,000kg. At \$100/kg this makes the commercial value of the fishery \$2.5m. The recreational value of this whitebait fishery is far greater than any monetary value that can be placed on this fishery. I would estimate 2-3 times the commercial value of the fishery. Many whitebaiters spend far more on equipment, time, and fuel compared to the value of the fish caught. A sign seen on the backs of many vehicles is "fishing is not a matter of life and death....its more important than that". A cold Christchurch winter with smog pollution and congested roads is more bearable knowing the whitebait season starts in August. This fishery is good for the health and wellbeing of many Canterbury residents. The applicants offer a kayaking course as a new recreational activity. I doubt this would be used by whitebaiters and in no way should be viewed as mitigation for the loss of recreational opportunities of those who fish for whitebait. I am not as familiar with whitebaiting at the Rakaia River but believe there will be negative impacts on this whitebait fishery as well.

- 2.1.2 Lower river flows will impact on other native fish species harvested for food including: long and short finned eels, lamprey eel, kahawai, several species of flounder, yellow eye mullet, smelt, Tuatua and even moonfish. Several years ago my friend and I caught a 28 lb moonfish in one on the river mouth channels. Priceless!
- 2.2 Impacts on other native fish including the endangered Canterbury mudfish
- 2.3 Impacts on native marine mammals. The rare Hector's dolphin frequently feeds near the Waimakariri mouth and I have observed Hector's dolphins inside the Waimakariri estuary environs. These dolphins often hunt for food in discoloured waters. Lower flows will mean less discoloured water for dolphins to obtain food.
- 2.4 Impacts on riverbed birds. The braided rivers are home to many species of native birds that are in serious decline. Lower water flows will impact on the ecology of these species. Increased weed problems will decrease their habitat and provide cover for introduced predators and therefore increased predation.

- 2.5 Lower flows will impact on the natural character of the Waimakariri river mouth. This is the only braided river mouth with a sand estuary on the eastern South Island. Every season the river mouth takes a different form. Various channels, pooling areas and small lagoons can form. Every days fishing at the mouth is different than the day before. This makes fishing at the Waimakariri varied, challenging, and enjoyable.**
- 2.6 Impacts on the braided river bed will be negative. Continual low flows will impact on the natural character of the Waimakariri and Rakia rivers. Recreational values will be diminished. Kayakers, rafters, jet boaters fishers will all have diminished recreational opportunities and the value of their recreation experience reduced.**
- 2.7 Diminished Water quality.**
- 2.7.1 Nitrates from intensive farming, and dairy farming, will find their way into the Waimakari and Rakia rivers, and Canterbury ground water systems.**
- 2.7.2 Discharges from meatworks already make the lower Waimakariri river putrid and disgusting when the river drops below 60 cumecs. Long periods of low flows will exacerbate this disgusting river pollution.**
- 2.7.3 Increased nutrients and low flows may create a sea lettuce explosion similar to that of the Avon Heathcote estuary. This will impact on new and existing sub divisions in the area. It will make white baiting and floundering impossible as nets will be fouled by sea lettuce. The Christchurch City Council could waste considerable ratepayers funds attempting to treat a new sea lettuce problem.**
- 2.7.4 In the braided sections of the Waimakariri and Rakia rivers it is possible that long periods of constant low flows will cause increased algal growth and possible didymo infestation. This could ruin the enjoyment of recreational activities, and whitebait fishing.**
- 2.8 Weeds on river beds. My observed evidence of riverbeds, where too much water is extracted, is that weeds flourish. Apart from project river recovery funded by Meridian energy, water extractors cause riverbed weed problems and do not pay for weed control. Weeds degrade the landscape and natural character of the river, and spread weed seed to farmland and native reserves. Weeds diminish habitat for native birds and allow cover for predators of native birds hastening their decline towards extinction.**
- 2.9 Future water flows from the Waimakariri will be lower and the additional impacts have not been fully taken account of during the relatively short term of the consents applied for. Changes in landuse in the upper catchments include land tenure review and retirement of grazing. The headwater**

catchments will likely become shrublands and forested areas. This may decrease normal water flows by 25%. This situation may develop faster than predicted because of the soon to be announced government policies on carbon credits. It may become considerably more expensive to clear land of forest and wilding conifers. There may be incentives to capture carbon by foresting large areas of the high country. It is difficult and legally challenging to remove water extraction rights when future lower flows occur and consents for extraction need to be reduced.

2.10 Impacts on New Zealand's tourism industry. The tourism industry is now New Zealand's main sector income earner generating 6.8 Billion dollars in 05/06. One in ten New Zealanders is employed in the tourism industry. 88% of tourists say they are satisfied with New Zealand's unique landscapes and native biodiversity. They do not travel ½ way around the world to see dairy farms and tame rivers. Tourism has grown steadily and has considerable future potential for growth. The future of the tourism industry relies on maintaining New Zealand's natural character, landscapes and native biodiversity. The impacts of water extraction from the Rakaia and Waimakariri rivers will contribute to diminished natural character, decline in native biodiversity and loss of natural character. If these consents are approved they will, in part, diminish New Zealand's tourism revenue.

2.11 Impact on salmon fishery. I caught my first salmon in the Waimakariri two years ago. Priceless. The day I caught my salmon was when the river was clearing after a fresh and a flow of around 80 cumecs. This is the prime river flows for salmon runs and the chance to catch a salmon. The extraction of 40 cumecs of water from the river will severely impact salmon runs. I support any submissions made by Fish and Game which will better detail impacts on the salmon fishery.

3.0 I wish the consent authority to make the following decision:

- Decline all consent applications listed above.
- Or, require a full impact assessment be carried out by the applicant on impacts raised in this submission, and, relevant impacts raised by other submitters before any consents are issued.
- If the applications are granted the applicant should:
- Be required to adhere to, and pay full costs for, an extensive monitoring programme on impacts, and potential impacts, caused by water extraction.

- **Pay full compensation to adversely affected recreational and commercial users of the river.**
- **Pay compensation to Environment Canterbury and the Christchurch City Council for all ratepayer contributions made to mitigate negative impacts caused by the scheme.**
- **Pay a contribution to LINZ and the Department of Conservation for riverbed weed control and a contribution to mitigate the adverse impacts on native biodiversity.**

4 I do wish to be heard in support of my submission.

Dated at Christchurch 10th day of August 2006



Keith William Briden