

## Written Statement on behalf of the Otago Fish and Game Council

- [1] The Otago Fish and Game Council ('Fish and Game') is the statutory management authority for sports fish and game bird species. In order to fulfil parts of the Council's statutory obligations under the Conservation Act (1987), Fish and Game takes an active role participating in planning processes to advocate for the interests of hunters and anglers and for the protection of habitat which sports fish and game bird species rely upon.
- [2] In the 2016/2017 year, Fish and Game sold roughly 29,000 licences across Otago to hunters and anglers, meaning the organisation represents tens of thousands of individuals in carrying out this function.
- [3] Within this plan change stream, earthworks are a clear priority for Fish and Game. We are supportive of the objectives and policies put forward because of their clear direction to minimise adverse effects on the environment. The need for strong policy in the Queenstown Lakes District is urgent as sediment discharge from poorly planned sub-division and development is having a significant adverse effect on aquatic ecosystems.
- [4] Wanaka is an excellent example of this. The town has engulfed small spring fed streams which boast stable flows that do not easily flush sediment from their systems. This type of habitat is perfect for spawning and rearing functions for natives and introduced species and the ecosystems support the wider Lake Wanaka aquatic system. However, silt from surrounding urban development, much of which comes from inappropriately designed earth works, regularly runs into these streams. This fills the interstitial spaces between the natural rock and gravel substrate and destroys the existing ecosystem, limiting habitat for macroinvertebrates on which fish feed; and destroying spawning opportunities and cover for juvenile fish. Urban aquatic ecosystems are being irreparably altered just a few years.
- [5] The proposed plan gives a small number of rules relating to earthworks immediate effect. Fish and Game strongly supports this as we hope they will provide a base level of protection.
- [6] In a similar vein, Fish and Game seeks to alter rule 25.5.20 to remove exceptions for lakes and wetlands not flowing into a lake or river. Unconnected habitat, for example an ephemeral wetland or lake, provides seasonal habitat for species such as waterfowl and can form a crucial niche for some highly specialised species. Sedimentation affects these habitats like any other and they deserve a base level of protection in order to retain their ecological function. Arguably, these ecosystems are less common than permanently watered ecosystems, which creates more of a need to protect them not less.
- [7] Furthermore, the use of the word 'flow' in this rule is ambiguous. In some habitats, connecting flows can be intermittent throughout the year. An ephemeral wetland or lake may connect during winter but be dry or disconnected in summer. A more effective and enforceable outcome would be to eliminate the exemption based on flow from the rule.
- [8] Fish and Game's submission has also raised the issue of the phrase 'indigenous biodiversity'. Fish and Game seeks that this be amended simply to 'biodiversity' so as to include introduced species which the community values. Angling opportunities in particular are valued by the community and are a drawcard for tourism in the region. Otago accounts for roughly 70% of angling pressure in New Zealand, the majority of which occurs within the Queenstown Lakes District. Trout and salmon are valued by the community and habitat they rely on is deserving of protection from a range of issues. Using the term 'biodiversity' does not detract from the protection afforded to indigenous species and it gives effect to s7(h) or the Resource Management Act (1991).
- [9] Finally, in undertaking its functions in the Conservation Act (1987) relating to access, Fish and Game regularly places signs in angling and hunting areas throughout the district. These provide information about regulations relevant for the area as well as conditions of access. Fish and Game installs or replaces roughly a dozen signs of this type per year. It's a public service carried out to fulfil a statutory requirement and Fish and Game has made suggestions to ensure this activity can continue under permitted status. Forcing organisations like Fish and Game or DOC to apply for consent for this type of information signage will create an unnecessary drain on everyone's resources.