

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of application for resource consent by the Central Plains Water Trust and a notice of requirement for the designation of land by Central Plains Water Limited associated with the construction and operation of the Central Plains Water Scheme

**STATEMENT OF EVIDENCE OF NEVILLE ELLIS
ON BEHALF OF
THE NEW ZEALAND SALMON ANGLERS ASSOCIATION (INC)**

1 INTRODUCTION

- 1.1 My full name is Neville Frank Ellis.
- 1.2 I am the Immediate Past President of the New Zealand Salmon Anglers Association (“NZSAA”) having previously served as President for four years prior to 2007. I have been a member of NZSAA for 26 years during which time I have been actively involved in the salmon recovery programme. I have also become conversant with aspects of the Resource Management Act and advocated on the Association’s behalf at many hearings of consent applications for water takes affecting the salmon fishery
- 1.3 I have fished the Rakaia River occasionally between 1960 and 1972 and since then every fishing season as my main summer sporting activity. I lived permanently in Rakaia for four years but now travel from Christchurch to camp at the holiday park during the summer to enjoy my fishing and jet boating the river braids. Having the ability to travel by jet boat, I am familiar with most of the Rakaia River from the mouth to the gorge.
- 1.4 My evidence will cover the following issues affecting the Rakaia River:
- Contravention of the Water Conservation (Rakaia River) Order 1988
 - Maintaining and enhancing the fishery
 - Access for anglers
 - Water discharge
 - Fish screening
 - Water quality and quantity
 - Tourism and economic effects

2. WATER CONSERVATION ORDER

- 2.1 The Rakaia River is one of the largest and most productive salmon fishing rivers in New Zealand. This was recognised in 1988 by the granting of the National Water Conservation (Rakaia River) Order 1988 (“WCO”). The outstanding characteristics and features embodied in clause 3 of this Order are:
- (a) “An outstanding natural characteristic in the form of a braided river;
- (b) “Outstanding wildlife habitat above and below the Rakaia River Gorge, outstanding fisheries, and outstanding recreational, angling and jet boating features.”
- 2.2 We submit that the large amounts of water proposed to be taken from the river, together with the structures and ongoing maintenance required to support this, will, without doubt, change the natural braids of the river in major ways by the permanence of the artificial channel structures and the continuing maintenance in the river bed. They will also prevent anglers accessing one of the most productive fishing areas unless by jet boat.
- 2.3 The take proposed for the power station from a point approximately 6 kilometres below the Gorge Bridge to allow the Ashburton District Council to produce power will cause the waters of the Rakaia to be permanently discoloured or dirty which is contrary to the WCO rules stated in Chapter 9. NZSAA has made a submission on the power proposal but we would prefer to discuss this later in the hearing.

3 MAINTAINING AND ENHANCING THE SALMON FISHERY

- 3.1 NZSAA undertakes a salmon enhancement programme each year in an endeavour to assist and improve the fishery which has suffered a serious decline in recent years due to lowered returns of spawning fish. The programme includes the raising of young salmon from eggs stripped from returning adult salmon at Montrose hatchery above the Rakaia Gorge. These eggs are fertilised from returning jack fish, hatched and raised until approximately 60 grams in weight and then released back into the Rakaia system. This process ranges over approximately a 12 month period. The small salmon then migrate to sea and return as adults, hopefully in increased runs.
- 3.2 Some of these young salmon are taken and released in other waters such as Lake Coleridge and the South Canterbury area at the Rangitata River to assist those fisheries.
- 3.3 Another part of the enhancement programme involves the planting of salmon ova in specially-designed incubation boxes placed in spawning streams of the Rakaia, Waimakariri and Hurunui Rivers.
- 3.4 NZSAA has some 400 members who are keen to retain and improve the salmon fishery. The extraction of water from our major rivers impacts very negatively on the fishery. Less water in the rivers means the water temperature increases, returning fish suffer damage travelling in shallower water and the mechanical equipment that will be required to move streams can leave fish marooned in pools away from running water.

4 FISHING

- 4.1 Those of us who fish the Rakaia River for salmon, spend much time checking the pools and, in late October or early November, start fishing in the lower reaches of the River. Fishing is best when the flows are approximately 150 cumecs early in the season as the water is coloured by snow-melt. Then catches tend to decrease as the flows lower and the River gets clearer.
- 4.2 As the season progresses we tend to move up the river and, during February-March most angling, for those who can get there, is in the area where the headworks will be situated for these two proposed schemes. The River at this time is usually flowing at around 90-120 cumecs.
- 4.3 If these schemes are allowed to proceed then only the extremely fit anglers or those who have jet boats will be able to access these productive waters. Because of the amount of water the abstractors are seeking, the River will be channelled from one side to the other and this will also be a barrier to anglers as they will not be able to cross the streams unless they have a jet boat.
- 4.4 Although consent conditions may state otherwise, it is not uncommon that existing consented irrigation channels prevent or seriously impede access by anglers to the river. For example, the North Branch down from the Main Road bridge does not currently have an angler crossing point; the public road behind the golf course on the south side leads to an irrigation channel that is frequently deep and difficult to cross. Frequent monitoring of consent conditions such as this is logistically impracticable and dependent on angler re-action to rectify.

5 IRRIGATION TAKE

- 5.1 To ensure water will flow in consistent quantity for the proposed take for the irrigation on the true left bank of the river downstream of the take for the electricity scheme, more work will have to be done regularly by bulldozers. This will cause the river to be dirty downstream for 24 to 48 hours depending on how much work is carried out.
- 5.2 Natural flooding of the rivers is a frequent occurrence during the salmon angling season with seasonal rains in the Main Divide and local catchments causing the rivers to be unfishable for varying periods. Anglers accept this river flushing as part of the natural cycle which is predictable in most cases by weather forecasting. However the introduction of artificial structures and regular channel maintenance works, probably without prior notice, causing man-made water discolouration and pollution is an unnecessary and unacceptable additional intrusion into the usable time that anglers and other river users, who have probably travelled long distance by car, have to undertake their recreational interests.
- 5.3 River works carried out during salmon smolt migration will trap large numbers of smolt. Salmon smolt will not swim upstream and most currently installed screens are ineffective in preventing smolt from getting into irrigation channels. NZSAA supports the submissions of Mr Davor Bejakovich of Fish & Game NZ in relation to the need for adequate fish screening to protect salmon fry from entrapment and loss to the fishery.
- 5.4 The channel width required to move 20 cumecs of water is another barrier to fishermen or others accessing the river. The only way this can be overcome is to build vehicle bridges over the channel at every legal road and walk bridges every 500 metres so river access is not denied to the public.
- 5.5 The current locations of legal road access to the Rakaia River is shown on the attached Appendix 1 "Rakaia Area and Location Maps". The note to the map warns that not all are easily accessible due to changing river conditions. Such conditions are changes in river course by natural events, not the construction of artificial structures preventing access.
- 5.6 Any work carried out on the riverbed that may change braids requires signs placed on every access point downstream with 24 hours' notice warning that flows in braids may change suddenly.
- 5.7 To demonstrate the dangers of sudden channel changes, around 1981, I launched my jet boat above the Main Road bridge at approx 8am and, in company with two friends, drove upstream to fish. Some 4 hours later we came down river and turned left into the braid where we had launched to find there was now no water. Because there was insufficient space to turn, we destroyed the bottom of the boat on boulders left by a bulldozer who had moved the river to obtain water for a lower irrigation scheme. As well as a wrecked boat, my passengers had severe bruising and we were all extremely fortunate not to suffer more serious injury. Therefore it is essential that signs be placed at least 24 hours prior to work being undertaken by bulldozers on the river.

- 5.8 Along the river there are instances of water being diverted from the mainstreams for irrigation. Many do not have sufficient flows to ensure that excess water is returned to a flowing braid. So any salmon fry end up being shag food or die, as young salmon do not swim upstream. An example of this was at Steeles Road last season when a diversion was full of salmon fry. Fortunately a small fresh in the river saved some of these young fish.
- 5.9 Takes that have become permanent and divert water to the old north braid of the Rakaia, that previously only flowed when the river was in flood, are further problems that have not been rectified. The water taken to maintain the large dairy herd on Rakaia Island ends up back in the river, pollution and all. Allowing two more schemes to remove water from the river, will only increase the pollution being caused by poor farming practices along the river banks.
- 5.10 Both these schemes will have the effect of flatlining the flows and will have a disastrous effect on anglers' ability to find fishable areas. Every time the river rises it encourages fish to come into the river from the sea, as the water from these minor floods travels further out into the sea areas where fish tend to school prior to entering the river.

6. RECREATION, TOURISM AND THE ECONOMY

- 6.1 The Rakaia River is a unique and special place, owned by all New Zealanders, and is not replicated anywhere else in New Zealand. Its fishery is exceptional and internationally recognised. As a frequent occupier of the Rakaia camp, I observe the high number of overseas tourists who come for the salmon fishing.
- 6.2 Other water activities such as jet boating and canoeing are exciting and challenging. An estimated 20,000 people, locally and from overseas, spend leisure time on the river each year. Many more use the river for picnics, swimming and boating. Bird watchers, trampers and motorbikes and quadbikes in numbers frequent the river during the summer months.
- 6.3 I understand that Mr Canham (Fish & Game) has addressed the hearing in relation to these issues.
- 6.4 The ability for families to have a day outdoors on the river and swim safely is rapidly disappearing from the NZ scene. These leisure grounds enjoyed by thousands of New Zealanders are being degraded and slowly polluted with agricultural chemicals. This is made worse by the amount of water being taken out of the rivers and the effects of pollution from dairy farms along the river banks.
- 6.5 A considerable number of people and commercial firms make their living from the fishery with some shops in Christchurch having four or more specialist staff in their fishing sections. Some camping grounds and tourist operators in Canterbury near the major rivers depend on the seasonal angler occupation and visits to sustain their businesses. The Rakaia River has long-established camps and settlements at the Gorge, township and both sides of the river mouth. Further degrading of the salmon fishery will certainly affect these and other local businesses.

7 CONCLUSION

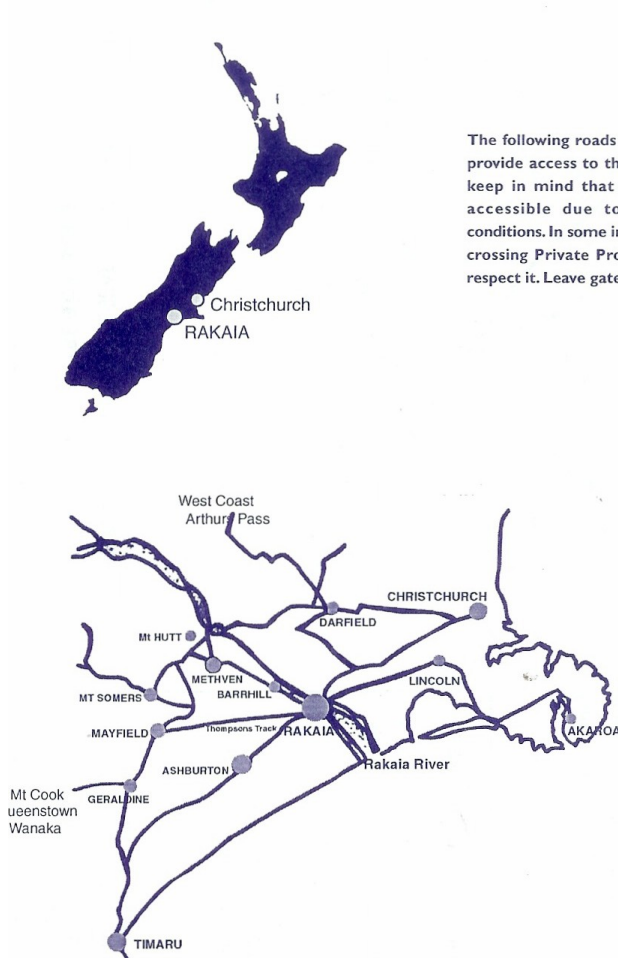
- 7.1 The schemes are potentially detrimental to the future fish stocks in the rivers by interference with the natural salmon life cycle and the efforts of NZSAA to enhance the fishery by its assisted breeding programme. Thus the opportunity for anglers to pursue their recreational interests will be inhibited.
- 7.2 The schemes compromise the purpose of the Water Conservation (Rakaia River) Order 1988 to protect the outstanding natural characteristics of the Rakaia River.
- 7.3 NZSAA believes that neither of these schemes is necessary or desirable and should be declined in the interests of the environment and the fisheries upon which they will negatively impact.

Neville Frank Ellis

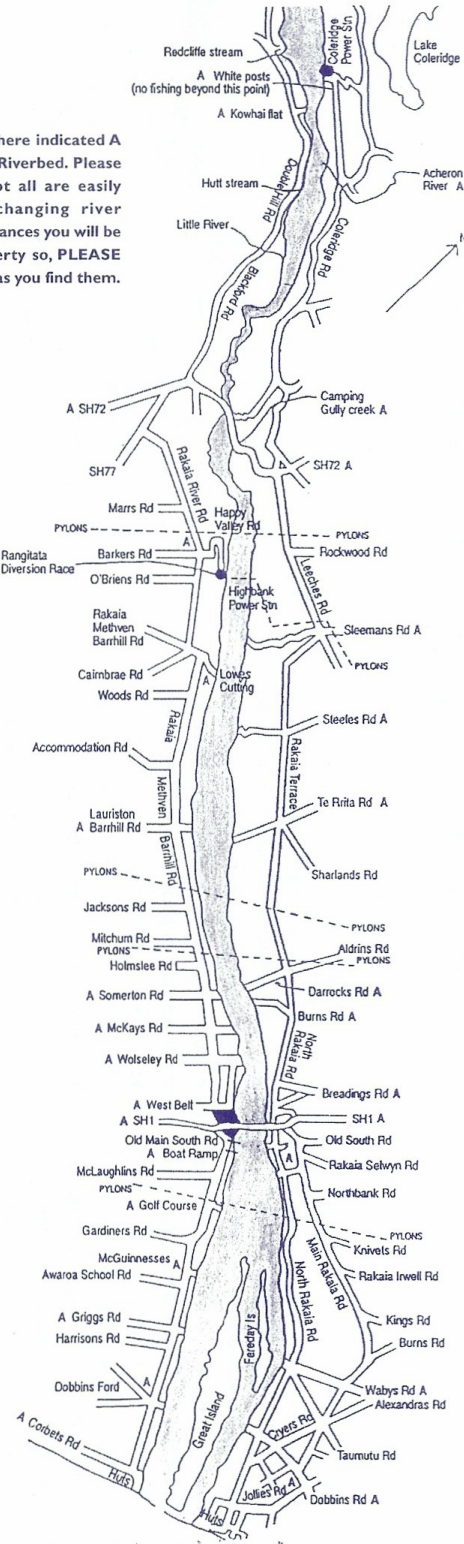
**Immediate Past President
New Zealand Salmon Anglers Association**

APPENDIX 1

RAKAIA AREA and LOCATION MAPS



The following roads where indicated A provide access to the Riverbed. Please keep in mind that not all are easily accessible due to changing river conditions. In some instances you will be crossing Private Property so, PLEASE respect it. Leave gates as you find them.



Distance in Kilometres and Travel Times between Rakaia and....

North to	Christchurch	50 km	40 minutes
	Kaikoura	240 km	3.2 hours
	Picton	400 km	5 hours
South to	Ashburton	26 km	20 minutes
	Timaru	104 km	1.5 hours
	Dunedin	303 km	3.5 hours
West to	Mt Hutt	48 km	35 minutes
	Geraldine	80 km	1 hour
	Arthurs Pass	150 km	2.5 hours