
Submission on the Greater Wellington Regional Policy Statement PC1 Variation 1

Wellington Fish and Game Council

1. Wellington Fish and Game Council (WFGC) submits on Variation 1 of the Proposed Change 1 to the Regional Policy Statement (RPS) for the Greater Wellington Region (GWR). WFGC confirms that it wishes to exercise its right to be heard in relation to this submission.
2. WFGC is the statutory body established under the Conservation Act 1987 responsible for the management of sports fish and gamebird resources in the Wellington Fish and Game region. Several of the gamebird species under WFGC's management are indigenous to New Zealand, and so WFGC shares a particular interest in the maintenance of New Zealand's indigenous biodiversity alongside the interests of mana whenua and other New Zealanders.
3. WFGC's statutory management functions include the maintenance and enhancement of the habitat of sports fish and game – the rivers, lakes, streams and wetlands within which sports fish, gamebirds, and many indigenous taonga species thrive. WFGC is tasked by statute to advocate for protection and restoration of these habitats and works with Greater Wellington Regional Council (GWRC), mana whenua and community groups on habitat protection and restoration throughout the GWR.
4. In discharging its statutory responsibilities, WFGC represents the interests of over 8000 license holders (sports fish anglers and game bird hunters) in the region. These recreational pursuits are part of New Zealand's cultural heritage and are woven into the fabric of our society and ethos.
5. Many of these license holders are also rate payers and WFGC expects that their interests and the interests of all ratepayers in the region will be fairly represented in the RPS and into the future.

RPS PC1 Variation 1

WFGC is supportive of the inclusion of long-term visions for Te Awarua-o-Porirua Whaitua and Te Whaitua Whanganui-a-Tara into the GWRC RPS PC1as required by clause 3.3 of the NPS-FM 2020. WFGC is also supportive of the ecosystem and freshwater health focus of the freshwater visions as stated in this Variation 1.

However, the lack of consultation during the drafting process with WFGC as statutory managers of the sports fish and game bird resources, and the limited involvement with the wider community in the process (acknowledged in paragraphs 47, 49, and 50 of the Section 32 evaluation report of this

Variation 1) raises concerns regarding whether the process of the NPSFM 2020 has been followed correctly, particularly Section 3.2 (b), which requires every regional council to engage with communities and tangata whenua to identify long-term visions, environmental outcomes, and other elements of the NOF.

The stating of these long-term visions will go on to inform environmental outcomes and target attribute states in the Natural Resources Plan, and therefore the long-term visions must be achieved through a democratic process involving the wider community.

Further to this, the lack of communication with WFGC during the development of this Variation 1 is surprising, as the protections for the habitat of trout and salmon is enshrined in the Resource Management Act (1991), the Natural and Built Environments Act (2022), and the NPSFM (2020). As a leading advocate for wetland and freshwater habitat with statutory and legislative responsibilities, WFGC should have been involved in this process from the outset. While the acknowledgement of fishing and recreation in these long-term visions is well worded and expressed, it falls short of the mark in acknowledging the requirement to protect the habitat for trout and salmon insofar as this is consistent with protections of the habitats of indigenous freshwater species (Policies 10 and Policies 9 of the NPSFM 2020, respectively).

The NPSFM 2020 also states in Appendix 1B (other values that must be considered), that where FMUs or parts thereof have fishing values, attributes associated with this fishing value (for both indigenous and valued introduced freshwater fish) need to be specifically targeted to allow the numbers of fish to be sufficient and suitable for human consumption. This information can only be ascertained in communication between those groups mandated to manage these resources and treasures, including Regional Council, tangata whenua/mana whenua, Fish and Game, and the Department of Conservation.

Conclusion

WFGC appreciates the opportunity to comment on this Variation 1 and understands the time pressures and urgency of this body of work. However, reliance on relevant Whaitua Implementation Program statement and a lack of engagement with community and WFGC has potentially circumvented important aspects of the NPSFM 2020 and allows for important future works in setting targets and attributes to continue to not fulfil national level legislative obligations for freshwater health.

WFGC wish to be heard in respect of this submission.

Yours sincerely

Ami Coughlan

Resource Officer

13 November 2023