

**IN THE MATTER** of the Resource Management Act 1991  
**AND**  
**IN THE MATTER** of the proposed Te Tai o Poutini Plan  
**AND**  
**IN THE MATTER** of a submission by the  
**WEST COAST FISH & GAME COUNCIL**

Statement of evidence of **Dean Kelly**  
**For WEST COAST FISH & GAME COUNCIL**  
**Topic 1 Introduction / General Provisions**

Dated: 27 September 2023

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## INTRODUCTION

1. My full name is Dean Gilbert Kelly.
2. I am the Manager of the West Coast Fish and Game Council (**Fish and Game**).
3. I hold a degree in Zoology from the University of Otago.
4. I have been the Manager for the West Coast Fish and Game Council for 14 years. Previous to being appointed Manager I was employed for 8 years as a Fish & Game Officer in the West Coast Region. In performing my various duties under that role I have had substantial involvement in the sustainable management of the regions sportsfish and gamebird resource. My role includes critically analysing data and managing wildlife populations and their habitat.
5. Over the past 22 years with Fish and Game I have had involvement with the administration of the three currently operative District plans, formation of the region's Land and Water Plan and Regional Policy Statement, and been involved in numerous resource consents hearings, stakeholder groups and educational programs regarding freshwater and wetlands.
6. I am a warranted Fish & Game Officer under the Conservation Act 1987.
7. I am giving this evidence as a sports fish and game manager for the West Coast Fish and Game Council.
8. I am familiar with the Buller, Grey and Westland Districts, and West Coast Region, the sports fish and gamebird resources present within them, and the resource management system that applies to them.
9. While this is not an Environment Court hearing, I have read the Environment Court's Code of Conduct for Expert Witnesses 2023, and I agree to comply with it. My qualifications are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise.
10. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

## SCOPE OF EVIDENCE

11. This evidence is prepared in relation to Topic 1 Introduction and General Provisions of the proposed Te Tai o Poutini Plan (TTPP). It sets out general background to Fish and Game, and the West Coast Fish and Game Council, and provides an overview

of the significant sports fish and gamebird resources of the three West Coast districts, including the economic contribution provided by these resources to the economy of the three Districts. The general background and overview parts of my evidence will also be relevant to Fish and Game's submission points for subsequent topic hearings.

12. In preparing this evidence I have reviewed, or am familiar with;
  - a. The notified TTPP, specifically those parts of relevance to the management of the sports fish and gamebird resource.
  - b. The operative District Plans.
  - c. The WCRC s42a Staff Recommending Report for Topic 1
  - d. The Lake Mahinapua Iwi management plan.

## **BACKGROUND TO FISH AND GAME**

### **Fish and Game's Involvement in the TTPP process**

13. Initially Fish and Game provided feedback during the consultation period on the proposed TTPP. Fish and Game subsequently submitted on the notified TTPP generally supporting the document with some changes requested to ensure anglers and hunters can continue to sustainably harvest sportsfish and game on the West Coast, and so that plan provisions do not become an unnecessary administrative burden or impediment to Fish and Game efficiently administering the sportsfish and game bird resources of the districts, and carrying out its management functions.

### **Fish and Game establishment and statutory role.**

14. In 1990 the management of New Zealand's sports fish and gamebird resources was restructured by an amendment to the Conservation Act 1987. Twelve Regional Fish and Game Councils and one New Zealand Council were established as Crown Entities with specific functions, responsibilities, and powers to manage sports fish and game birds, as specified in Sections 26 Q, 26 R, and 26 S of the Act. Subsequently, with the introduction of the Crown Entities Act 2004, they ceased to be Crown Entities and became Public Entities. Fish and Game's functions, responsibilities and powers under the Conservation Act and Wildlife Act remained unchanged.

15. Fish and Game receives no government funding, and its activity is financed mainly through the sale of sports fish and game bird licences. Anglers and hunters purchase licences to fish or hunt and in return have input into the sports fish and game bird management in their region. Councillors are anglers and/or hunters elected through a democratic process by whole season licence holders. The West Coast Fish and Game Council represents approximately 2000 Anglers and 500 Gamebird Hunters. As stated later in my evidence the number of anglers and hunters utilising the region, is at least twice this due to visiting angler and hunters. And the flow on benefits to wider parts of the district's population, (and economy), are greater still.
16. The main purpose of the West Coast Fish and Game Council, as set out in Section 26Q of the Conservation Act is to:

*“Manage, maintain and enhance the sports fish and gamebird resource in the recreational interests of anglers and hunters.”*

In fulfilling this purpose, the primary functions of the Council are to:

- assess and monitor sports fish and game populations, habitats, and harvests.
- assess and monitor angler and hunter satisfaction.
- maintain and improve the sports fish and game bird resource and the access to it.
- provide information and promote angling and hunting.
- represent the interests of anglers and hunters in the statutory planning process.

### **Fish and Game as a Conservation Agency**

17. Very early on after Fish and Game's establishment under the Conservation Act the organisation realised that without intact habitat, sports fish and game birds would not flourish and provide a sustainable resource for Kiwi's to harvest. As such, the majority of Fish and Game's resources have been invested in habitat protection. Nationally, Fish and Game has subsequently become one of New Zealand's leading wetland construction and enhancement organisations and a champion for freshwater quality.
18. Legislation acknowledges the high-quality habitat requirements for trout and salmon and still uses that habitat as a cornerstone to protect all aquatic species through mechanisms such as S7(h) of the RMA which requires Councils to protect the habitat of trout and salmon. This same recognition has recently been carried through to the

NBEA to ensure New Zealand continues to have stringent water quality requirements and retains a strong advocate through Fish and Game for the highest quality habitat. Fish and Game manages a range of both indigenous and 'valued introduced species' and although many indigenous species require a higher level of protection 'valued introduced species' as specified in the New Zealand Biodiversity Strategy / Te Mana o Te Taio 2020 also have a high conservation value and in most instances share the same habitat as indigenous species.

19. The New Zealand Biodiversity Strategy / Te Mana o Te Taio 2020 defines 'valued introduced species'<sup>1</sup> as;

*Introduced species, including sports fish, game birds and animals and species introduced for biocontrol, which provide recreational, economic, environmental or cultural benefits to society.*

20. The New Zealand Biodiversity Strategy / Te Mana o Te Taio 2020 expressly recognises some of the conservation activities engaged in by Fish and Game. It records that<sup>2</sup>; .

*The value placed on trout provides an avenue for strong habitat **conservation advocacy**. Many keen trout anglers, as well as those who hunt other game species, also spend time taking part in **protection and restoration projects** to keep freshwater resources and wetlands healthy through involvement in community **conservation** groups or initiatives led by organisations such as Fish & Game New Zealand. To date, Fish & Game has secured 12 out of 15 **Water Conservation Orders**, including one in the Nevis River to explicitly protect the indigenous Gollum galaxias, and has also undertaken countless cases under the Resource Management Act to **protect** Aotearoa New Zealand's freshwater environments.*

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<sup>1</sup> At pg 63.

<sup>2</sup> At pg 32, my emphasis.

21. In protecting and enhancing freshwater and wetland environments, licence-holders, through their licence fee, are conserving habitat for all species not just the ones they harvest.

## OVERVIEW OF THE WEST COAST FISH AND GAME RESOURCE

22. The West Coast Fish and Game region<sup>3</sup> extends from Kahurangi Point in the North of Buller District to Awarua Point (Big Bay) in the South of Westland District. It is bounded to the east by the Southern Alps and to the west by the Tasman Sea. The region is very diverse, with dramatic landscapes and considerable variation in climate, topography, and land use. This is also reflected in the diversity of habitats and fishing and hunting opportunities in the region.
23. The region is known nationally and internationally for its diverse wild brown trout (*Salmo trutta*) fishery. This resource is recognised and enjoyed by anglers from throughout New Zealand and visitors from other countries. A large number of variously sized rivers and lakes provide brown trout habitat and fishable water in a range of scenic settings. The Lake Brunner catchment in Grey District receives the most use, closely followed by the Grey River catchment. At the other extreme are the numerous highly valued back country or wilderness fisheries that have good numbers of trophy-sized fish which sustain fewer angling numbers but are increasingly attracting more attention from overseas anglers and provide a highly sought-after experience.
24. The region offers diverse freshwater wetlands for dabbling ducks throughout the three Districts. Small ponds, streams and drains associated with developed land provide reliable breeding habitat for dabbling ducks as does extensive riverbed habitat. Where large open water bodies such as lakes and coastal wetlands are in proximity to feeding areas large concentrations of dabbling ducks may be expected. Reliable spring rainfall usually produces optimum conditions to assist the survival rate during the hatching / rearing period and through to the hunting season.

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<sup>3</sup> I use the term region, in the context of the West Coast Fish and Game Region, which is closely contiguous with the three West Coast Districts.

25. This diversity of habitat, currently low hunting pressure, and ease of access is increasingly attracting hunters from the Canterbury and Nelson regions where habitat and access to hunting and fishing areas are now extremely limited due to urban encroachment through subdivision of rural environments and associated access restriction.

## **Angler Usage and Economic Contribution**

### *Angler usage*

26. The West Coast has excellent trout, salmon and perch fisheries as well as highly sought-after gamebird hunting. Over half the hunting and fishing in the region is from anglers and hunters from neighbouring regions and international visitors (NIWA, 2016). The pristine backcountry fisheries and spring creeks are popular with international anglers due to the ability to 'sight' fish to be targeted in clear water. This is now rare in many parts of New Zealand, and the rest of the world. Ease of access to fisheries and gamebird hunting areas and a lack of 'crowding' are also reasons for the popularity of the three Districts to fishers and game bird hunters. The numerous lakes with good populations of trout and salmon are popular with boat anglers from neighbouring regions. The rise in popularity of Lake Brunner / Kotuku - Whakaoho (Tai Poutini's most fished freshwater body) coincides with road improvements from Canterbury for towing vehicles. South Westland is now popular with boat owners from the burgeoning Central lakes area.

27. The New Zealand Fish and Game Council contract NIWA to survey 'Angler Usage of Lake and River Fisheries managed by Fish & Game – New Zealand'. This is known commonly as the National Angler Survey ("NAS"). This is a nation-wide program which is conducted by interviewing a randomised selection of anglers by telephone over the fishing season. The primary objective of the survey is to obtain consistent estimates of annual angler usage for all New Zealand lake and river fisheries managed by Fish & Game. It has been conducted four times since its inception, 1994/95, 2000/01, 2007/08 and the 2014/15 season. The following was noted in the 2014/15 survey;

*"Over half of the effort recorded on the West Coast in 2014/15 was associated with visitors from other regions.*

*Total effort for the West Coast region in 2014/15 was 57,080 angler days, distributed over 80 river fisheries and 12 lake fisheries in 39 catchments. Just under half of this total (26,610 ± 3,030 angler-days; 47% of the total) was recorded in the Grey catchment, but a further 11 catchments each contributed over 1,000 angler-days, and collectively accounted for 23,910 angler-days (42% of the total). River and lake fisheries accounted for 35,740 (63%) and 21,340 angler-days (37%) of total effort, respectively. Lake fishing was dominated by Lake Brunner, which recorded 14,700 angler-days (26% of the regional total), but river fishing was much more broadly distributed. The most heavily fished river (the Grey River) accounted for 4,950 angler-days (9% of the total), moderately skewed in favour of the lower reaches below Ikamatua (3,050 angler-days) relative to the upper reaches above Ikamatua (1,900 angler-days). The remaining effort (30,780 angler-days; 54% of the total) was distributed over 76 rivers spanning the 500 km from the Heaphy River in Kahurangi National Park to the Awarua River at Big Bay. This diversity of angling opportunity, over a broad geographical range, is a distinguishing feature of the West Coast fishery.*

*New Zealand resident licence holders from other FGZ regions expended 28,000 angler-days within the West Coast region, representing over half (52%) of the regional total. The largest contribution (13,390 angler-days) came from North Canterbury, followed by Otago (5,940 angler-days); Central South Island (3,890 angler-days); and Nelson/Marlborough (3,530 angler-days). By far the most popular water with visitors was Lake Brunner, where 71% of the total effort (10,270 angler-days) came from outside the region. However, in South Westland, total effort has increased markedly since the 1994/95 survey, an even higher proportion of total effort in 2014/15 (7,460 of 9,080 angler days) came from outside the region. Overseas visitors contributed 2,520 angler-days to the regional total, broadly distributed across 14 catchments from the Cascade to the Karamea, and representing 4.4% of the total. The more than two-fold increase in total annual effort since 1994/95 (Table 3-5) has occurred throughout the region. Relative to 1994/95, effort has increased by a factor of 2.14 in the Grey District (essentially the Grey Valley); by a factor of 2.07 in the Hokitika/Taramakau region; and by a factor of 3.39 in South Westland (all waters south of Ross)."*



*Most of the increase in the Grey District is attributable to a three-fold increase in annual effort on Lake Brunner, up from 4,240 ± 550 angler-days in 1994/95 to 14,420 angler-days in 2014/15, but the cumulative effect of incremental increases in effort in a number of less well-known fisheries has also contributed to the overall trend. A similar pattern is evident in the Hokitika/Taramakau sub-region, where moderate increases in effort on the Hokitika and Taramakau Rivers have been augmented by less pronounced but cumulative increases on several smaller fisheries.*

*The most dramatic increases have occurred in South Westland, particularly south of the glaciers. Over this area, annual effort has increased from 2,220 ± 340 angler-days in 1994/95 to 9,100 ± 2,630 angler-days in 2014/15. The rate of increase in the northern part of the sub-region (i.e., Ross to the glaciers) has been more gradual, but still represents an increase from 2,500 ± 520 angler-days in 1994/95 to 6,890 ± 1,680 angler-days in 2014/15.*

### *Economic Contribution*

28. Research is currently underway to assess the economic value of angling to the region but in the absence of current data we can get an estimate from Liang Jiang's 2015 research as part of a Master of Commerce at Otago University on the Economic Value of Freshwater Angling to the Otago economy. The estimates from that research are comparable with estimates, using similar methods, with data from other areas in New Zealand and around the world. Angler demographics regarding visiting angler numbers are similar between the West Coast and Otago, therefore the research findings are also applicable to the West Coast. The research showed those who fished in back-country fisheries contributed more to the local economy than anglers who fished lowland rivers and lake fisheries. Domestic and international anglers differ in terms of expenditure, number of trips (trip counts), length of trip, and time spent fishing per trip.
29. Average fishing trip expenditure in the southern lakes district per domestic angler was approximately \$290 (in 2015). This increased to \$4,518 for international anglers who have farther to travel, stay and fish for longer as well as having a preference to fish remote backcountry waters which have higher associated costs such as helicopter

transport. It would not be unreasonable to use these figures as an estimate of expenditure of angling visitors to the West Coast Region. This would provide a rough estimate for anglers spending two days fishing at Lake Brunner alone of a \$2m annual economic contribution. Fish and Game has just completed its latest iteration of the National Angler Survey and although only in draft format at this stage angling activity has continued to increase post-covid with an associated increase in economic value to the region. In response Fish and Game have just introduced a new licencing regime to manage the impact of these high-end tourists.

**Specific conservation activities required for sustainable management of the Fish and Game resource.**

30. Fish and Game reports annually to the Minister of Conservation on its conservation, and sustainable management of species, to ensure it is fulfilling its statutory obligations to maintain and enhance the sportsfish and game resource.
31. Some of the operational tasks that Fish and Game perform have the potential to be impacted by the TTPP. This could impact on Fish and Game's ability to undertake conservation activities associated with sportsfish and gamebird management or habitat protection. For example; Controls on aircraft or boat use could affect culling operations and population monitoring by aircraft/drone or boat. Anglers and Hunters also perform a function in managing gazetted populations to levels below a threshold that they present a nuisance to landholders with forage crops. Therefore, Fish and Game are specifically interested in aspects of this plan that could decrease the ability of hunters to assist farmers and landowners to manage populations. Another example is that rules pertaining to structures should provide (as a permitted activity) for the construction of small temporary hides (mimai) that are essential for gamebird hunting on the West Coast. Similarly, the plan should not provide unnecessary impediments to access to waterways and wetlands that are utilised for sports fishing and gamebird hunting or management.

**Significant Resource Management Issues affecting Sports Fish and Game on Te Tai o Poutini.**

32. The West Coast Fish and Game Council recognises the direct relationship between the abundance of sports fish and game bird species and the quality and quantity of

habitat available to them through the course of their life cycle. Most species management in the West Coast region is therefore undertaken through habitat protection. While many species are monitored, there is minimal direct intervention to increase the numbers of fish and game species. In managing habitat, maintaining it is more effective than trying to restore it after it is damaged or destroyed.

33. Populations of the region's sports fish and game bird species are generally sufficiently well established to sustain a recreational harvest.
34. In relation to gamebirds, productivity is driven by land use and habitat available for breeding/feeding/resting. Freshwater wetlands, ponds and lakes provide critical breeding/moulting/feeding habitat for many gamebird species including the native shoveler duck, native paradise shelduck, native grey duck, native pukeko, and introduced mallard duck. Protection and management of these waterbodies is therefore critical for the maintenance of regional gamebird populations.
35. Gamebird hunting is also constrained by surrounding land use, and generally becomes untenable for example, once urban encroachment into traditionally hunted sites occurs. Currently Paradise Shelduck and other Gamebird populations are sustainably managed through hunting. Paradise Shelduck can predate on new pasture and crops during and after the Autumn moult. The effect on landowners is currently managed through increased hunting pressure and, less frequently, organized culls. Urban encroachment inevitably makes this untenable and removes this management tool. Subsequently Fish and Game cannot assist landowners with problem populations of gamebirds. Lake Poerua and the Barrytown Lagoons are local examples where urban encroachment is impacting hunting and control options.
36. Access to sportsfish and game habitats is a necessity to ensure sustainable management of the region's populations can be achieved. Area's inaccessible through land management policy and regulatory controls on small temporary structures reduce the ability to manage populations and therefore can create refuges for problematic concentrations of birds such as Pukeko, Black Swan and Paradise Shelduck resulting in frustrations with landholders and forage crops. Okarito Lagoon and Lake Kaniere are current examples where gamebird management is problematic. Game birds are very sensitive to changes in roosting area's and are therefore not 'hunnable' without hunters making small, camouflaged temporary structures to conceal themselves (MaiMai). To achieve sustainable management through hunting these activities/structure need to be permissible where birds congregate (wetlands

and waterways). These issues will be explored in greater detail in forthcoming evidence to be presented in subsequent Topics regarding proposed TTPP rules that would have the effect of requiring resource consents for temporary maimai.

37. Development of public reserve areas and cycle or walkways also cause hunter displacement, with a local example being Lake Mahinapua and Creek.
38. These issues, individually and cumulatively, are significant resource management issues affecting sports fish and gamebird management, and the protection of the habitat of trout and salmon, within the West Coast region.
39. That is not to say that Fish and Game opposes developments such as urban and lifestyle block subdivisions, or cycleway developments, in close vicinity to sports fish or gamebird habitat. But Fish and Game is affected by such developments and should have an ability to engage in the consenting process when it is affected. Involvement in subdivision proposals such as those bordering Lake Poerua have the potential to hinder population management with species such as Black Swan, Canada Geese and Paradise if appropriate provisions are not made through the affected party process. Development of mining, gravel extraction, and forestry near to rivers can affect gamebird population breeding and roosting sites as can restrictions on public access to our region's waterways.
40. While there is a significant portion of the New Zealand population which value sportsfish, it is fair to say there is also discontent with some New Zealanders around the ecological niche these species now occupy within our waterways, due to the fact they are not indigenous species.
41. Incorporating the competing views of these two sectors of New Zealand society within resource management plans will always be a challenge, all that can be done is to look to science to quantify both the impacts of sportsfish on indigenous fish, and then following this, what is actually practically possible within the present day state of New Zealand waterways under the over- arching legislation that currently protects sports fish such as trout and salmon.
42. Fish and Game consider that the primary cause of the decline of native fish in other parts of New Zealand has been the loss of habitat for these species, by land development, the associated sedimentation of rivers, and the loss of riparian vegetation. Compared with these changes, which affect all freshwater species, the impact of salmonids on native species has been small.

43. In contrast to other parts of Aotearoa/New Zealand some rivers in the South Westland region, which remain largely undeveloped, support a combined whitebait harvest of over 5 tonnes annually, while at the same time also supporting premier brown trout fisheries, which resident anglers and tourists from around the world come to fish. The predominance of untouched south Westland swamp forest habitat gives us a glimpse of what has been lost from other districts, such as Marlborough, in terms of the whitebait and other native fishery habitat that was once present.
44. Specific roles and approvals for activities involving fish species are shared by Fish and Game Councils, the Department of Conservation, and in some cases, the Ministry for Primary Industries, under the Freshwater Fisheries Regulations 1983.
45. Whilst Fish and Game Councils and the Department of Conservation manage fish species, the management of habitat of all freshwater fish and appropriate provision for the amenity derived from these fishery resources is the responsibility of territorial authorities under the RMA.
46. The reason these specific clauses exist in the legislation is because trout and salmon having been here for 150 years, are now deemed to be desirable. They are recognised in the New Zealand Biodiversity Strategy as 'valued introduced species', and are protected by New Zealand law. Indeed, if any person removes a sportfish or gamebird and kills it, except in the case of possession of a valid licence using approved methods, they become liable for prosecution under the Conservation Act or Wildlife Act.

## **SUBMISSION POINTS TOPIC 1 INTRODUCTION / GENERAL PROVISIONS**

*302.001 Add WCF&G to list of entities to be specifically considered when deciding whether any person is affected.*

47. As the statutory entity responsible for Sportfish and Game management, it is important that Fish and Game is notified when proposed activities may adversely affect Fish and Game resources on the West Coast. This is particularly important given the statutory requirement, and territorial authorities' responsibility to have particular regard to the protection of the habitat of Trout and Salmon. Without notification to Fish and Game, there will be no advice provided through the consenting process on whether activities will have no more than minor effects on the habitat of sportfish and game, or how such effects can be most appropriately mitigated.

48. New Subdivision, developments such as aviation activities near riparian margins, and activities/structures on the surface of waterbodies have the potential to impact river and lake access as well as disturbance of the species themselves. If Fish and Game are not considered an affected party access to our regions rivers and lakes could be reduced, and the presence, or management of wetland birds or sportsfish could be affected in a more than minor way.
49. The proposed TTPP Introduction Chapter lists entities to be given specific consideration when deciding if a person is affected and this should include West Coast Fish and Game Council, in relation to habitats of sports fish and game birds.

*302.002 Add reference to Fish and Game activities to definition of Conservation Activities*

50. My evidence has described the role of Fish and Game as a conservation agency, and the conservation activities undertaken by Fish and Game, and licence holders in managing and enhancing sports fish and gamebird resources and their habitats. Throughout the plan, reference is made to Conservation Activities and provisions are made to permit activities for this purpose. Fish and Game related activities should be clearly and unambiguously included in the definition of Conservation Activities.
51. Gamebird (and some sportsfish) populations if not sustainably harvested can create problem populations for landowners and aviation activities.
52. A similar situation also occurs when landholders prohibit hunting through legal mechanisms such as, the Department of Conservation's prohibition of shotguns in National Parks, and certain reserves not allowing hunting, which in turn causes problems for aviation in area's in the vicinity of airports.
53. In these instances, it could be argued that the issue then becomes pest control and hunting/fishing for them would accordingly fall within the definition of Conservation Activity. However, even when these species are at levels causing nuisance they are still not legally defined as pests. The plan should not be ambiguous, and it should be clear that Fish and Game's management activities, including those undertaken by licence holders, are within the definition of Conservation Activity.
54. A failure to acknowledge the conservation benefits of this control mechanism for species such as Paradise Shelduck, Canada Geese and Black Swan can result in perverse outcomes for our regions biodiversity. We currently have this occurring at

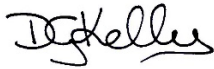
Lake Pratt where approximately 1000 Paradise Shelduck are now congregating for their moult next to a number of helipads which subsequently presents a danger to aviation. Hunting is not possible in half of the lake due to the National Park status.

55. As another example, small amounts of vegetation removal for 'Conservation Activities' are permitted in the plan. Again, Fish and Game, and licenced hunters, should be able rely on this permitted activity.
56. If hunters cannot clear a small amount of vegetation for access to wetlands to hunt the number of problem populations will increase.

## **Conclusion**

57. The sportsfish and gamebird resources in the three Districts are part of the natural environment. They are valued introduced species, long naturalised in Aotearoa/New Zealand. They are an important recreational resource, and for many families in our community, are a very important source of food on the table. The sportsfish and gamebird resources of the West Coast are locally, nationally, and internationally recognised, and contribute to the local economy, with the potential for that contribution to continue to grow. Sportsfish are nationally important species that have specific recognition through the RMA and NBEA. There can be conflicts and issues with the protection of the habitat of trout and salmon as well as gamebird habitat with unsustainable development of the region's resources, and West Coast Fish and Game Council should be regarded as an affected party when such conflicts or issues arise, so that we can work with Councils and applicants to resolve them.
58. Fish and Game has provided input to the consenting process on issues that affect sports Fish and Game since its inception. Largely this is through planning process such as this, and through the s95 approval process for non-publicly notified consents as an affected party. Fish and Game particularly values this constructive affected party process and rarely has been unable to find a solution to both provide for development and the habitat of sportsfish and game. Development such as Subdivision, Mining, Roading and Infrastructure near to and in sportsfish and game habitat are some specific issues that Fish and Game have been able to find solutions through this process and Fish and Game as the mandated Statutory Agency in relation to sportsfish and gamebird management seek that this continues, in a way that recognises the Conservation Activities undertaken by Fish and Game and its

constituent licence holders.



Dean Kelly

27/9/23

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