

In the Environment Court of New Zealand  
Christchurch Registry

I Mua I Te Kōti Taiao O Aotearoa  
Ōtautahi Rohe

**ENV-2025-CHC-000134**

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Under	the Resource Management Act 1991 (the Act)
In the matter of	an appeal under clause 14(1) of the First Schedule of the Act on a decision on the proposed Te Tai o Poutini Plan
Between	<b>Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio and Te Rūnanga o Ngāi Tahu</b>
	Appellant
	<b>Te Tai o Poutini Plan Committee</b>
	Respondent

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**Notice of wish to be party to proceedings pursuant to section 274 of the Act**

30 January 2026

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To: The Registrar  
Environment Court  
Christchurch

- 1 West Coast Whitebaiters Association (**WCWA**) wish to be a party to the appeal by Te Rūnanga o Ngāti Waewae, Te Rūnanga o Makaawhio and Te Rūnanga o Ngāi Tahu on the proposed Te Tai o Poutini Plan (ENV-2025-CHC-000134) (**Appeal**) pursuant to section 274 of the Resource Management Act 1991 (**Act**).
- 2 WCWA has an interest in the proceedings that is greater than the interest that the general public has because it represents whitebaiters across the West Coast that would be impacted by the changes sought in the Appeal.
- 3 WCWA is not a trade competitor for the purposes of section 308C or 308CA of the RMA.
- 4 WCWA is interested in point 10. of the Appeal, relating to ASW-R4 – Installation of Structures on the Surface of Natural Waterbodies.
- 5 WCWA opposes the relief sought because—
  - (a) Temporary whitebait stands are regulated, and consented, by the West Coast Regional Council under the West Coast Regional Council Land and Water Plan.
  - (b) Limiting ASW-R4 to 'recreational' whitebaiting will by default mean 'commercial' whitebaiting stands require resource consent under ASW-R6, creating an unnecessary additional consenting burden on some whitebaiters.
  - (c) This will also create an administrative burden on district councils, which is unnecessary given the structures already require resource consent from the regional council.
  - (d) Further, unlike the New Zealand fisheries (which have separate commercial and recreational quotas), whitebaiting is not separated into 'commercial' and 'recreational' whitebaiting. In many cases, a clear distinction between 'commercial' or 'recreational' stands will not be possible – some stands might be utilised by multiple people whitebaiting for different purposes, or whitebaiters who generally whitebait 'recreationally' may choose to sell a little bit of their catch from time to time, particularly if the catch is exceptional.

(e) Even if 'recreational' and 'commercial' whitebaiting activities were able to be readily distinguished, there is no effects-based reason for distinguishing between stands that are for commercial or recreational use.

(f) The relief sought in the Appeal will therefore create an unnecessary and costly burden on whitebaiters, and an administrative burden on councils. It therefore does not assist the Councils in carrying out their statutory functions under the Act, is not the most appropriate method of achieving the Act's purpose, will not promote that sustainable management purpose, and will not accord with Part 2 of the Act.

6 WCWA agrees to participate in mediation or other alternative dispute resolution of the proceedings.

Dated 30 January 2026

A handwritten signature in black ink, appearing to read 'Roney', with a long horizontal line extending to the right.

Robert Roney

On behalf of the West Coast Whitebaiters Association

**Address for service of person wishing to be a party**

Email: [rroney@xtra.co.nz](mailto:rroney@xtra.co.nz)

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**Advice**

If you have any questions about this notice, contact the Environment Court in Christchurch.