

THE RANGITATA RIVER RESOURCE CONSENT APP BY THE RDR

The RDR is applying for resource consents to replace a fish screen and to take more water from the Rangitata River. Details are [here](#)

CRC182535 - to discharge water from the take authorised under CRC182536 and suspended sediment to the river via the fish bypass return;

CRC182536 - For a non-consumptive take of up to 5 cumecs of water from the Rangitata River associated with the operation of a fish screen;

We understand this is to allow the fish screen to work at the highest efficiency level so support this additional water being used for this purpose, however, we note that it is based on approximately 10% of the take, since we don't support the additional water take, this should be capped at 3 cumecs.

CRC182537 - to disturb the bed of the Rangitata River for the construction of the fish bypass outlet;

We support this however the design needs to ensure fish are not damaged as they are returned to the river.

CRC182538 - to temporarily discharge sediment to the Rangitata River as a result of the construction and maintenance of the fish bypass outlet;

CRC182539 - to extract gravel for the construction and periodic maintenance of the fish bypass outlet;

CRC182540 - to use land for earthworks over an aquifer;

CRC182541 – the emergency discharge of water to the Rangitata River;

We do not support taking additional water out of the Rangitata River for additional water storage so therefore do not support this

CRC182542 - to change conditions of CRC011237 to enable an alternative fish screen design consisting of a Mechanical Rotary Fish Screen to be used;

We support the change to the Mechanical Rotary Fish Screen as we understand it will provide the highest level of fish exclusion. The Rangitata Conservation Order states that;

(2) No resource consent in relation to an intake site may be granted, or rule included in a regional plan, for the waters specified in Schedule 2 authorising an activity unless that resource consent provides for fish exclusion or a fish bypass system to prevent fish from being lost from the specified waters.

And

13. Exemptions

(1) Nothing in this order prevents the grant of a resource consent that would otherwise contravene the conditions set out in Clauses 8 to 11 if -

(b) the exercise of any such resource consent would not compromise the preservation and

protection of the outstanding characteristics and features identified for the waters specified in the Schedules.

And the RDRs current consent conditions state that;

The consent holder shall take such measures as are appropriate to ensure that, so far as is reasonably practicable, juvenile salmon are excluded from the body of the diversion race and are returned to the river

Fish and Game have tested the current screens efficiency, and we understand all agree it doesn't perform adequately.

Since the RDRs inception some 70 years ago the RDR has operated without an effective fish screen and since 2007 has not met the conditions of its resource consent to ensure that juvenile salmon are excluded.

Currently the salmon fishery is struggling – any losses of fry into the RDR undoubtedly have a greater impact on the fishery than what may have occurred historically.

The lack of an effective fish screen breaches both the RDR's consent conditions and the Rangitata Water Conservation Order - the main purposes of which is to protect the salmon fishery.

We therefore ask that the consenting authority prioritise the granting of the consents required for the new fish screen a head of the additional consent to take additional water, and instruct the RDR to proceed immediately to have it installed.

CRC182630 - to use water for storage;

We do not support taking additional water from the Rangitata River

CRC182631 - to use water under CRC170654 for storage, irrigation and stockwater purposes, and to generate electricity at Montalto and Highbank Power Stations.

We do not support taking additional water from the Rangitata River for these reasons;

We note the above application doesn't include any provision for any environmental purposes or mitigations. Most waterways in Canterbury have declined over time through a process of many small cuts and small changes, that on their own appear insignificant, but when all added together, culminate in a degraded environment – it's time to stop until current issues are addressed.

1. The intensification of agriculture that additional irrigation will allow for, has been shown to impact negatively on the environment with raised nitrate levels in ground water, increased phosphorus in water ways causing alga blooms, and increases in E.coli levels in waterways reducing the water quality for human recreation
2. The decline in the Hinds River which within the RDR's area of operation is a clear example of how intensification of agricultural activity has been allowed to impact on waterways. Elevated Nitrate levels and reduced flows because of reduced input and increases in ground water takes, mean this stream is all but dead.

3. We don't see that the RDR has any plans to address environmental issues within its area of operation, and its record on something as fundamental as installing a fish screen is hardly indicative of a company that puts much weight on the concerns of the community and the environment.
4. We believe that before any new consents are issued for more water or expanding irrigation schemes, that current environmental issues are addressed first, or at the very least are included as part of the package of environmental mitigations included within an application. There are no such mitigations included within this application.
5. When business is benefiting at a cost to the environment it is only fair and reasonable to expect them to address the issues that their operation both directly and indirectly causes, currently there is a huge environmental deficit that needs to be addressed.

We expect any new irrigation developments should be world leading in both environmental best practises and environmental mitigations, there is no indication of any such commitment here.

Federation of Freshwater Anglers