

2nd March 2018

Hawke's Bay Sports Fish & Game Management Plan Review
PO Box 7345
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Attn: Mark Venman

Via email to hawkesbay@fishandgame.org.nz

Dear Mark

Submission on Hawke's Bay Fish and Game Council's Draft Sports Fish and Game Management Plan

Thank you for the opportunity to make a submission on the draft management plan released by the Hawke's Bay Fish and Game Council ('HBFGC').

The Hawke's Bay Regional Council's vision, purpose, focus and values

As you may know, in August last year, the Hawke's Bay Regional Council ('HBRC') adopted a new 2017-21 Strategic Plan outlining the organisation's strategic priorities over the next five years. These priorities have provided the basis for development of HBRC's 2018-28 Long Term Plan which is currently being drafted for public release later this month.

The Strategic Plan clearly signals that HBRC wants a healthy environment, a vibrant community and a prosperous economy. We will work with our community to protect and manage the region's precious taonga of rivers, lakes, soils, air, coast and biodiversity for health, wellbeing and connectivity.

Clearly, HBRC operates in a dynamic environment. The region and HBRC's operating environment is different today from what it was when the regional council was first established in 1989. The same can be said of HBFGC's operating environment too.

Our four principal priorities outlined in the 2017-21 Strategic Plan are:

- Water quality, safety and certainty *Kia kounga, kia haumaru, kia pūmau te pai o te wai*
- Smart, sustainable land use *Kia koi, kia ukauka te whakamahinga o te whenua*
- Healthy and functioning biodiversity *Kia ora, kia mahi tika te kanorau koiora*
- Sustainable services and infrastructure *Kia ukauka ngā ratonga me ngā hanganga ā-rohe*

These four priorities are additional to the other 'business as usual' work we do, and signal where more attention is needed in the short to medium term.

Underpinning our mahi are the following core values:

- **Partnership and Collaboration** we work with our community in everything we do
- **Accountability** we hold ourselves to account to deliver results, be responsive to community expectations, and the best use of ratepayers' funds and assets
- **Transparency** we report on what we do and the value this delivers for our community
- **Excellence** we set our sights and expectations high, and never stop striving to do better.

We reiterate these elements of the Strategic Plan to reinforce HBRC's commitment to work with tāngata whenua, plus a wide range of statutory agencies and non-government interests.

The Hawke's Bay Biodiversity Strategy 2015-2050 is but one tangible example of working together towards positive outcomes for the regional community. Both HBRC and HBFGC were two agencies in the cooperative effort to develop that strategy. Similar partnerships are being forged to implement that strategy so the region's biodiversity is enhanced, healthy and functioning.

OUTCOME 1 – Amend the draft management plan to give greater recognition, and emphasis to, HBFGC working with local government (including HBRC) to achieve positive outcomes for the region's people, communities and the environment.

Advocacy and working with others

As outlined above, HBRC and HBFGC will clearly have a good number of common interests in our respective roles and responsibilities as statutory agencies established by the Crown. To achieve positive outcomes for people, communities and the environment in Hawke's Bay, we need to work together.

Regrettably, it seems some of the language used in the draft management plan could be interpreted as meaning HBFGC might appear less cooperative and somewhat more adversarial in reference to working with local government. By comparison, language used in reference to working with the Department of Conservation (for example) appears much more positive, constructive and cooperative. In section 1.3 of the draft plan, reference is made to the plan setting out to "reduce conflict among user groups" and improving communications and methods in fish and game management.

To illustrate, two examples (with emphasis added), are:

- a) Paragraph 3 on page 29 refers to "[HBFGC] will continue to seek the implementation of these statutory obligations where agencies are **failing** in their habitat protection responsibilities."
- b) Issue 11 on page 31 implies HBFGC are akin to watchdogs in reference to it supposedly "**needs to ensure** that other agencies are fulfilling statutory obligations with respect to their habitat protection responsibilities."

That said, we do note that many of the associated policies do express HBFGC's advocacy role and actions in a slightly more positive light. Advocacy should be about promoting HBFGC's roles and interests to other decision-makers so that those decision-makers are better informed on what will typically be a wide array of factors they need to consider. The HBFGC's advocacy role with local government should not be about berating decision-makers for their alleged failings. Adversarial proceedings in New Zealand's courts should be a last resort and not the norm. The wide range of interests and activities (many are common).

OUTCOME 2 – Amend the draft management plan so that policies and methods referring to advocacy places greater emphasis on working together with a range of agencies and less emphasis on adversarial court processes.

Indigenous flora and fauna and exotic species

While we appreciate that HBFGC has statutory duties in relation to the maintenance and enhancement of sports fish angling and game bird hunting, we do not agree that any such maintenance and enhancement should be to the detriment of NZ's indigenous flora and fauna. The vulnerability of many of NZ's our indigenous aquatic and terrestrial species is well documented. Predation by introduced species is a large threat (and curiously omitted from extensive list of issues in Section 3.2.1 of the draft plan).

As partners in a number of projects, plans and strategies (e.g. the Hawke's Bay Biodiversity Strategy 2015-2050) aiming to improve the stocks of indigenous flora and fauna and their habitats, HBRC submits that the draft management plan should be amended to temper the small number of plan provisions that imply maximising angling and hunting opportunities is to be achieved at any cost to our indigenous species.

OUTCOME 3 – Amend the draft management plan to better provide for avoidance and mitigation of effects of sports fish and game bird management on indigenous flora and fauna, particularly the region's indigenous aquatic species.

'Significant' sports fish and game bird habitats

The Hawke's Bay region does indeed have some wonderful waterways and environs highly prized for a wide variety of values and uses. On page 32 of the draft management plan (under Policy 3.2.1(b)), reference is made to Appendix 1 being attached *"for information purposes. It lists significant sports fish and game bird habitats in the Hawke's Bay Fish and Game Region but is not exhaustive."*

Unfortunately in the draft management plan's current form, the references to 'significance' are uncertain and lack any meaning in terms of qualitative or quantitative criteria. Appendix 1 is a non-exhaustive list, presuming others could be imported or added to it from time to time, but when, how and why is unclear. Furthermore, the list of waterbodies and margins in Appendix 1 are presented in broad sweeping terms. It offers no details of what parts of those named waterbodies are significant and significant for what (fish c.f. game bird, both, or only some types of fish or some specific bird species). For example, the Ahuriri Estuary presumably is not significant for trout habitat, while parts (but not all) of the Ahuriri Estuary is highly valued for game bird hunting at certain times of the year.

OUTCOME 4 – Amend the draft management plan, particularly Policy 3.2.1(b) and Appendix 1 so that the meaning of significant sports fish and game bird habitats in the HBFGC region is much clearer and ambiguity is removed.

User-friendliness of explanatory plan content

HBFGC is to be congratulated for the much of the supplementary material presented in the draft management plan. In particular, Part 1 (introduction) and Part 4 (resource description) offer useful commentary and context for the draft management plan's 'meatier' content such as the objectives, policies and methods in Part 3.

However, some of the explanatory material in the draft plan seems a little dated so its applicability for the plan's ten-year lifespan over 2018-28 needs revisiting. For example, the last sentence of paragraph 4 on page 75 observes that "forestry is also increasing and dairying is starting..." yet dairying has been present in the Hawke's Bay region for a decade or two now. Another example of aged references is on page 78 where a Department of Conservation survey from 1988 is cited – that's thirty years ago. These are just a few examples we use to illustrate that some future users of the management plan will be cautious about its content and relevance if it contains references to work of several decades ago.

OUTCOME 5 – Amend the draft management plan to ensure outdated research, references and older figures are removed or replaced with similar contemporary content better suited to a forward-looking plan for the 2018-28 period.

Closing comment

Thank you again for the opportunity to make a submission on the Draft Sports Fish and Game Management Plan. The Regional Council does wish to be heard in support of this submission, but do not wish to present a joint case with other submitters.

OUTCOME 6 - Regional Council representatives would welcome further discussion with HBFGC Council members and staff to continue better alignment of our relative positions on land use and water management in the Hawke's Bay region, particularly those raised in our submission above.

The Regional Council staff who reviewed the draft management plan for preparation of this submission had noted a number of specific provisions and corrections that we are willing to share with HBFGC's officers, but we have refrained from itemising those here in this submission.

The Regional Council's address for service in relation to this submission is:

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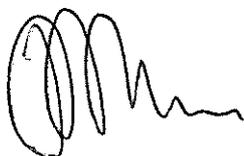
Attention: Gavin Ide

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Should you have any queries with regards to the content of this submission please do not hesitate to contact Gavin Ide, as above.

Yours sincerely

A handwritten signature in black ink, consisting of several loops and a trailing line, representing the name Tom Skerman.

TOM SKERMAN

GROUP MANAGER STRATEGIC DEVELOPMENT