

**Submission on the Department of  
Conservation (DOC)  
Improving Whitebait Management  
Discussion Document, January 2020**

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**March 2020**

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## **Introduction**

The Ōpāwaho Heathcote River Network (OHRN) thanks the Department of Conservation for the opportunity to make a submission on Improving whitebait management/Te whakapai ake i te whakahaere inanga.

The Ōpāwaho Heathcote River (OHR) and many of its tributaries in the catchment have some of the poorest water quality in the Christchurch West Melton Zone. The Ōpāwaho Heathcote River lies within a complex catchment which contains the Port Hills, a large industrial area, concentrated urban and residential zones, and the Avon Ihutai Estuary.

The OHR is home to a number of inanga species and has an abundance of habitat and spawning areas identified by DOC, NIWA, University of Canterbury, volunteer groups, and others conducting research along the river. Many sites have been damaged by ground movement in the Canterbury Earthquake Sequence (2010 to present).

The Ōpāwaho-Heathcote River Network (OHRN) is an umbrella organization that facilitates and supports the values, efforts, and needs of our community along the river. The OHRN is made up of a number of representatives from community environmental groups in the Ōpāwaho Heathcote catchment and estuary.

Our purpose is to ‘facilitate a collaborative network which advocates for the regeneration of the whole of the Ōpāwaho Heathcote River’ and our vision is ‘an ecologically healthy river that people take pride in, care for and enjoy.’

The OHRN provides a voice for small river-care organizations and the community. The OHRN currently has a total of 15 community/restoration groups actively working throughout the catchment. OHRN also collaborates with organizations such as the Christchurch City Council (CCC), Environment Canterbury (ECan), and the Christchurch West Melton Zone Committee to achieve our mutual goals of a healthier waterway.

## **OHRN’s response to the DOC Whitebait Management Discussion Document**

We support: The goal of Whitebait Management to ensure all six native whitebait fish species:

- are classified as not-threatened
- have abundant and healthy habitat
- have safe passage for migration

- are present and thriving in the locations they are expected to be and have historically been found.
1. We seek that the six whitebait fish species (regardless of their threat category) are not sold for commercial gain. No fish with any degree of threat should be sold on the market.
  2. We support reducing the season to **1 September – 30 October**. This is the best option available to protect peak migration of the different species.
  3. We support nominating whitebait refuges in each region. Selection of refuge locations and time periods should be informed by good science. Locations ought to be identified based on an understanding of population genetics, as well as source and sink factors and be specific to the locally threatened species.
  4. We seek that the Ōpāwaho Heathcote River be nominated as a refuge as identified in the appendix of the discussion document.
  5. We seek that science and local data inform the location, the size of the area being nominated for refuge, the time period that it is rested, and the selection criteria.
  6. We support a back-peg system to mark upstream locations where fishing cannot go beyond using the tidal limits as a reference.
  7. We seek assurance that DOC has the authority and resources to enforce licensing and location restrictions. We seek measurable benchmarks DOC will evaluate against as well as transparent data on enforcement and monitoring.
  8. We support restrictions of fishing gear to eliminate the risk of by-catch. We also support restrictions to the amount of fish being taken.

9. We seek assurance that DOC has the authority and resources to enforce these measures.
  
10. We support the phasing out of whitebait export. More importantly, we encourage DOC and the Ministry for the Environment to take a bold stance on prohibiting whitebait sales and discourage its economic viability. If there is a market for whitebait, overexploitation will always be a risk.
  
11. A **license, catch limit, and data collection** are management actions needed to achieve whitebait protection. The OHRN supports these measures.

We are willing to speak to our submission if the occasion arises.

*A. Hasselman*

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Chairperson

Ōpāwaho Heathcote River Network