

NEW ZEALAND FEDERATION OF FRESHWATER ANGLERS (INC.)



Tuesday, 15 December 2009

Secretary: Selwyn Hodder
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Submission on:

“RE-STARTING AQUACULTURE” – CONSULTATION ON AQUACULTURE TECHNICAL ADVISORY GROUP REPORT

Introduction.

The New Zealand Federation of Freshwater Anglers (Inc) is an affiliation of angling clubs from throughout NZ. It has been operating continuously since 1974. It is an independent organisation that represents the collective interests of the anglers who participate in freshwater sports fishing in New Zealand.

The Federation works to identify and resolve national issues affecting freshwater angling in NZ, and supports member clubs and organisations in their efforts to resolve local issues.

Our interest in aquaculture is twofold. Firstly, we are concerned that any land-based aquaculture doesn't further impinge on or affect freshwater recreational fisheries. Our lowland river fisheries, once such an attraction to overseas and local anglers, have already been damaged, poisoned or destroyed by the intensification of farming practices, particularly dairy farming. We would not wish to see this process increased or hastened by yet another intensive farming practice with a 'gold rush' mentality. Secondly, we are concerned that inshore and estuarine aquaculture doesn't impinge on the health or natural movement of sportfish (trout and salmon) between our rivers and the sea, as has occurred in other countries.

Submission.

The Federation is opposed to the establishment of any further freshwater finfish farming within NZ, despite the continuing efforts of Federated Farmers and the

National Business Review (13th November 2009) to promote this. Problems associated with such ventures, which are marginally profitable at best, are well known and have been conveyed in depth to Government by us previously. These include pollution (wastewater, antibiotic and feed/additive dissemination), the introduction of disease to resident wild fish populations, genetic modification of wild fish through farm escapes, issues of access and resource over-allocation, and the facilitation of a black-market in sports fish. But most of all, finfish farming is unsustainable, requiring a 4:1 ratio of fishmeal for every kilo of flesh produced. All of these issues are or have been illustrated by overseas experience. We would also point out that all of these problems are just as applicable to inshore coastal finfish farming.

Many of our members enjoy both freshwater fishing and coastal marine fishing as a recreation and traditional food-gathering pastime. They are not only concerned about the issues above, but also that access to estuaries, beaches and coastal waters (and the public fisheries they contain), is not compromised by private aquaculture operations.

We therefore support the development of a National Environmental Standard for aquaculture, prior to the implementation of any other of the TAG proposals, as long as there is adequate consultation with affected groups, the MfE is the lead agency with the power to enforce such standards, and the issues expressed above are adequately addressed.

The Federation calls for full public consultation and participation in all aquaculture planning processes and resource consents.

The Federation opposes any permanent establishment of private property rights in resources as public as waterways, estuaries and coastal seas. This includes making approval for occupation explicit. We consider that a default minimum term of 20 years is excessive.

The Federation considers that regional and district councils must be able to recognise and protect the public's right of access and use of public recreational resources and prohibit aquaculture ventures independently to central government. We therefore reject any suggestion that the minister can overturn such decisions or regional plans concerning aquaculture ventures.

Having said that, history and fact would suggest that many regional councils are not effective at protecting the natural environment and recreational interests in the face of private exploitation. In combination with effective National Environmental Standards for aquaculture, we submit that the power to monitor, prosecute, mitigate and enforce such standards be vested in an independent agency. The Environmental Protection Agency would seem an obvious candidate for this

Any planned aquaculture establishment must take into consideration the possible effect it might have on the health and natural movement of freshwater sports fish between the freshwater and marine environments. We reject the concept that this could be done by zone rather than by individual consent.

The Federation considers that the "Restarting Aquaculture" proposals are one-dimensional and unbalanced in favour of the private utilisation of public resources

over the resources protection and public utilisation. We urge that greater, more in-depth and public research is carried out on the effects of such aquaculture proposals on marine, estuarine and freshwater habitats and public fisheries prior to any implementation.

Ken Sims
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New Zealand Federation of Freshwater Anglers (Inc.)

On behalf of:
Ian Rodger
President