



388 Main South Rd, Paroa
P.O. Box 66, Greymouth 7840
The West Coast, New Zealand
Telephone (03) 768 0466
Toll free 0508 800 118
Facsimile (03) 768 7133
Email info@wcr.govt.nz
www.wcr.govt.nz

28 February 2020

Whitebait Management Consultation
Department of Conservation
P. O. Box 10420
Wellington 6143

Dear Sir/Madam

Comments on the "Improving Whitebait Management Te Whakapai ake I te whakahaere inanga Discussion Document"

The West Coast Regional Council welcomes the opportunity to make comments on the *"Improving Whitebait Management Te Whakapai ake I te whakahaere inanga Discussion Document"*. Attached are our comments.

Our contact details for service are:

Lillie Sadler
Planning Team Leader
West Coast Regional Council
Po Box 66
Greymouth 7840

Phone: 03 768 0466 ext 8212
Email: ls@wcr.govt.nz

Yours faithfully

Hadley Mills
Manager Planning, Science and Innovation

West Coast Regional Council comments on “Improving Whitebait Management: Te Whakapai ake I te whakahaere inanga: Discussion Document”

Introduction

The West Coast Regional Council (WCRC or the Council) supports having one set of regulations for managing whitebait throughout New Zealand. In particular, the Council supports any changes which bring the Whitebait Fishing Regulations 1994 for the rest of New Zealand (New Zealand Regulations) into line with the Whitebait Fishing (West Coast) Regulations 1994 (West Coast Regulations).

Many of the proposed changes are supported by the Council. However, we have concerns about some of the changes.

This submission covers our comments on the proposal generally, and the key points of changing the fishing season dates and closing river areas as refuges.

Background

Whitebaiting on the West Coast is a long-established activity that is enjoyed by many West Coasters and people from other regions. Whitebaiters have been undertaking the activity for many generations, with whitebait stands and sites often passing from one generation to the next. It is an activity that is undertaken both commercially and recreationally, with the activity indirectly supporting many local communities. Having the specific West Coast Regulations reflects this long history and association with the activity.

In addition to the specific West Coast Regulations, our Council has a regional plan that includes comprehensive provisions for managing whitebait stands on listed rivers, and these are monitored throughout the fishing season. Hence, whitebait fishing on the West Coast is closely managed and monitored by both the Department of Conservation (DOC) and our Council.

General comments

The West Coast is largely undeveloped with most spawning sites being located within the DOC estate. Whitebaiting within most of these areas is also prohibited under the West Coast Regulations. Regional plan provisions also manage adverse effects on spawning sites.

The Discussion Document provides very little scientific information about the state of whitebait species on the West Coast. While numbers of whitebait are declining nationally, there is uncertainty about whether numbers on the West Coast are declining, remaining stable, or increasing. The Discussion Document also does not provide information about how the proposed changes will stop the decline of whitebait and increase their numbers. Therefore we **request** that detailed analysis of whitebait numbers and spawning sites on the West Coast is undertaken before any changes are made to create one set of national regulations.

The current West Coast Regulations are already substantially more restrictive than the regulations for the rest of New Zealand. For example, the West Coast has a shorter whitebait season, there are 23 rivers that are closed to whitebaiting, back pegs are used to identify the upper limit of where whitebaiting can occur, and there are also more restrictions around the use of fishing gear. Therefore, we **suggest** amending New Zealand’s regulations to align with the current West Coast Regulations. This should contribute to protecting whitebait, and increasing their numbers overall.

3.1 Timing of the whitebait fishing season

The Council **supports** having the same whitebait fishing season for all New Zealand. Our preference is for the season to align with the current West Coast season of 1 September to 14 November inclusively. This is a shorter season than the rest of New Zealand by approximately four weeks.

Having a shorter season that aligns with the West Coast will likely reduce the number of whitebait caught in other regions, causing the number of whitebait available for spawning to increase, and thus increasing overall numbers.

The Discussion Document also does not provide scientific evidence to support changing the West Coast season. The Department of Conservations (DOC) preferred season of 15 August to 14 October, is longer than the current West Coast season.

3.3 Creating short-term and longer-term refuges for whitebait species

We **strongly oppose** closing additional rivers on the West Coast to create refuges for whitebait species. The West Coast Regulations prohibit whitebaiting in 23 rivers. These rivers are already acting as refuges as they provide suitable habitat for spawning.

The Discussion Document lists over 40 rivers that could be closed to whitebaiting on the West Coast. Many of these are in addition to the 23 rivers where fishing is currently prohibited. A large number of these additional rivers are commonly used for whitebait fishing. While we acknowledge that not all rivers included in the Discussion Document will be closed, we are concerned that increasing the number of closed rivers will have a detrimental effect on the species. For example, closing additional rivers will greatly reduce the number of rivers where whitebaiting can occur. This will lead to whitebaiters relocating to rivers that they do not normally fish on, placing a greater fishing demand on these rivers which could impact specific populations of fish.

The Discussion Document does not provide scientific evidence that numbers of whitebait are declining on the West Coast. Nor does it provide evidence that closing additional rivers, or specific rivers, will increase whitebait numbers. We understand that trout predate upon whitebait species, and this threat is not addressed in the Discussion Document. There is no information provided on the presence of trout in the 40 rivers proposed to be closed to whitebait fishing. We also understand that some whitebait species are more under threat than others, however management of this issue is not discussed. Therefore the Council cannot support closing any additional rivers unless scientific evidence clearly shows that numbers of whitebait on the West Coast are declining, and that closing additional rivers will increase numbers.

The Discussion Document also does not provide any explanation or justification for why the 40 rivers on the list were chosen. Nor does it provide an explanation for how a final decision on the rivers to be added to the current list will be made. Before a decision is made on a river, thorough consultation with the Council, local whitebaiters, and communities is required to ensure that only rivers with a high degree of certainty of increasing whitebait numbers, and with no predators, are closed. Greater transparency with scientific information and decision-making is needed.

Page 41 of the Discussion Document explains that rivers selected to be refuges will be regularly reviewed, but no information is provided about how they are to be reviewed, or who will undertake the review. We presume that DOC will be reviewing the rivers, and they will have a process for doing this. We are concerned that if a specific process and timeframes for reviewing the rivers is not set out, then the review may not be undertaken. This could lead to rivers remaining unnecessarily closed when they could be opened to whitebaiters.

Summary of outcomes/changes sought

- **Undertake** a detailed analysis of whitebait numbers and spawning sites on the West Coast prior to changing the Regulations.
- **Align** the rest of New Zealand's Regulations with the current West Coast Regulations.

- **Support** aligning the fishing season nationally with the current West Coast season of 1 September to 14 November inclusively.
- **Strongly oppose** closing additional rivers on the West Coast to create refuges for whitebait species.
- **Require** that rivers only be closed where scientific evidence clearly shows that closing the river will increase whitebait numbers.
- **Require** that thorough consultation with relevant stakeholders is undertaken before closing rivers.
- **Require** greater transparency with scientific information and decision making.

This ends our submission.