

14 September 2026

Environmental Protection Authority

Attention: Ms Cindy Robinson

Chair of the Expert Panel appointed to consider the Southern Link Inland Port

By email: substantive@fasttrack.govt.nz

Southern Link Inland Port: Request to withdraw Fish and Game's attendance at the freshwater hearing

Tēnā koe Ms Robinson,

I have previously written to confirm my attendance on behalf of the Otago Fish and Game Council (**Fish and Game**) at the freshwater hearing on 15 September 2026.

Having now received the summary statements from experts for the applicant and the Regional Council, I can confirm that Fish and Game's concerns have been addressed. I have presented an overview of this in the table below.

Issue raised in comments ¹	Fish and Game's updated position
The discharge quality is suitable to support trout fisheries values, with no measurable difference where the upstream monitoring site already does not meet those guidelines.	In his statement of evidence forming the section 55 response to comments Mr Bloomberg has helpfully stated that <i>"The objective of the SMP [Stormwater Management Plan] is to maintain the existing water quality and aquatic ecology."</i>² This aligns with the resolution Fish and Game sought. The stream currently supports spawning critical to the lower Taieri fishery, despite not meeting all the guidelines to protect fishery values, referenced by Fish and Game in its comments. Conceptually, under the stated objective the life-supporting capacity of the water body will be made no worse, meaning that the fishery values will be retained. Mr Bloomberg, Ms Miller and Dr Allibone, in their statements of evidence, have detailed the changes in the methodology for setting compliance and trigger limits for water quality, and/or the impacts on Fish and Game's concerns. The method now better reflects the Australian and New Zealand Guidelines for Fresh and Marine Water Quality (ANZG) and does not include the unjustified 10% increase where the water bodies do not currently meet the appropriate default guideline value. In summary statements for the Regional Council, Mr Chang and Ms Lion-Cachet state that the revised Stormwater Management Plan establishes a

¹ These issues are broader than the ones recorded in the applicant's Response to relevant comments document but provide an overview of Fish and Game's concerns

² Bloomberg statement of evidence, paragraph 3.7

Statutory managers of freshwater sports fish, gamebirds and their habitats.

Otago Fish and Game Council

5 Hazlett Road, Mosgiel, 9092, New Zealand

Telephone (03) 477 9076

Email: otago@fishandgame.org.nz www.fishandgame.org.nz

	robust framework. However, they contend that baseline sampling should be completed prior to bulk earthworks commencing.³ Fish and Game agrees that the Stormwater Management Plan is suitable to achieve its objective of maintaining existing water quality and aquatic ecology. Fish and Game also agrees that it would be most responsible to complete the baseline sampling prior to bulk earthworks beginning at the site. Fish and Game has no expert to assist the Panel with this question at the freshwater hearing and expects that the Panel will be assisted by experts engaged by the applicant and the Regional Council.
Address the potential for sediment pulses during construction	The updated Otago Regional Council consent conditions produced as part of the section 55 response to comments included new consent conditions B.21B – B.21D, which set standards for deposited sediment and visual clarity which must be adhered to during stage 1 construction. This is the riskiest stage for the generation of sediment pulses and Fish and Game is comfortable that these conditions will adequately address that risk. During stage 2 and 3 of construction, the risk of sediment pulses will be addressed through a combination of engineering solutions, outlined in the evidence and summary statement of Mr Keenan, the bottom lines in condition B.4 and the monitoring set out in the revised Stormwater Management Plan. The monitoring frequency of the Stormwater Management Plan is still too sparse to catch sediment pulses by itself; however, in combination with the engineering solutions and condition B.4, Fish and Game is comfortable that it will adequately address the risk.
No work be done in the wetted bed of the Silverstream between the start of May and the start of November. If this is not possible, then a more robust redd identification methodology & flood definition will be required	In his statement of evidence as part of the section 55 response to comments, Dr Allibone recommends that no work be done in the wetted bed between 15 May and 30 September to protect brown trout spawning.⁴ In making this recommendation, he acknowledges that there may still be damage to slow developing redds. Fish and Game agrees, and notes that redds cut early in the season, prior to 15 May, could also be damaged. However, Fish and Game wishes to take a pragmatic approach and is therefore comfortable with Dr Allibone's proposed mitigation. Central to this is Fish and Game's understanding of the in-stream work, which is quite limited in nature and will occur as a one-off activity. This approach helpfully does away with the need for the creation of a more robust redd identification methodology and definition of a flood.
The application is consistent with the long-term vision for the Taieri Freshwater Management Unit and Te Mana o te Wai	Given the above, Fish and Game is comfortable that the application as now proposed will be consistent with the long-term vision for the Taieri and the concept of Te Mana o te Wai.

³ Summary statement of Raymond Chang and Emily Lion-Cachet, paragraph 3.6

⁴ Statement of evidence by Dr Richard Mark Allibone, paragraph 3.9

Given that Fish and Game's concerns have been largely resolved, I wish to withdraw Fish and Game's attendance at the freshwater hearing. I expect that if further issues present themselves, they may be resolved in feedback on consent conditions, should the approvals be granted.

Yours faithfully,

Nigel Paragreen

Environmental Officer

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