

12 October 2026

Fast-track Approvals Act: Complex freshwater fisheries activity approval report

Section 51(2)(e) complex freshwater fisheries activity approval report
for –

FTAA-2605-1236

Remarkables Ski Area Upgrade and Doolans Expansion



Department of
Conservation
Te Papa Atawhai

**Te Kāwanatanga
o Aotearoa**
New Zealand Government

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1. Introduction

- 1.1 NZSki (the applicant) lodged a substantive application with the Environmental Protection Authority (EPA) for the Remarkables Ski Area Upgrades and Doolans Expansion Project (the Project). On 8 July 2026, after requesting and receiving further information from the applicant, the EPA determined that the application was complete and complied with section 46 of the Fast-track Approvals Act 2024 (FTAA/the Act).
- 1.2 As part of the application, NZSki is seeking an approval that would otherwise be sought under regulation 42 or 43 of the Freshwater Fisheries Regulations 1983.
- 1.3 On 11 June 2026, in accordance with section 51 of the Act, the Panel Convener directed the EPA to obtain a report prepared by the Director-General of Conservation in accordance with clause 4 of Schedule 9. This report is due on 12 October 2026.
- 1.4 This report is one of a suite related to various conservation approvals sought by NZSki, and for efficiency a covering report has been prepared that discusses matters common to the approvals sought, including Treaty of Waitangi settlement considerations and obligations. The DOC Covering Report should be read in conjunction with the individual approval reports.
- 1.5 This report is based on the application as at 4 September 2026.

2. Purpose of the report

- 2.1 This report has been prepared by the Department of Conservation (DOC) on behalf of the Director-General of Conservation. This report provides information on risks relating to complex freshwater fisheries activities to assist the Panel in its consideration of the application by NZSki, for an approval or dispensation for the Project. This report has been informed by technical advice from Dr Christopher Kavazos, whose Statement of Advice on freshwater matters, including his credentials, are appended to the DOC Covering Report.
- 2.2 In accordance with clause 4 of Schedule 9 of the Act, this report must address the following matters:
 - the alignment of the proposed activity with best practice and the New Zealand Fish passage Guidelines; and
 - the management of risks to freshwater values or habitat, including prevention of access to or spread of invasive species; and
 - the availability and quality of the habitat upstream and downstream from the proposed activity; and
 - the presence of threatened, data-deficient, or at-risk species under the New Zealand Threat Classification System in the vicinity of the proposed activity; and

- the advantages and disadvantages of providing fish passage upstream or downstream of the proposed activity; and
- any conditions that should be imposed in accordance with clause 6 or section 84.

3. The Project

3.1 The Project is the upgrade of the Remarkables Ski Area and expansion into the Doolans Basin.

3.2 The instream structures and activities proposed by the Project, as understood from the application documents, are:

- A Tyrolean weir intake on the Doolans Creek Right Branch at approximately 1370 metres a.s.l., together with an overflowing flushing chamber, training walls, a low head submersible pump chamber and a flushing line outfall approximately 45 metres downstream. The weir will permanently occupy approximately 20m² of stream bed and requires excavation of the bed to seat the precast flume unit.
- Twelve stream crossings within the Doolans Basin, comprising five permanent culverts (A, B, C, H, I), one temporary culvert (access to Tower 14) and six splash crossings (fords) (A–F). Culverts are 8 m long on a 1–1.5% longitudinal slope; splash crossings are formed on a ~2% bed grade with 1V:3H side slopes and a typical depth of 200–250 mm, armoured with riprap.
- Trenching of a services corridor, generally beneath the access tracks but through the watercourse at splash crossings and permeable track sections, at 1m wide by 2m deep. Concrete bulkheads will be installed at the downgradient end of trenches where water may follow the trench alignment. Limited blasting may be required where large boulders or shallow bedrock prevent mechanical excavation.
- Diversion of the intermittent inflow to the proposed 19,000m³ water storage reservoir. Approximately 55m of the mapped 210m intermittent inflow channel is removed and replaced with two armoured swales (111m southern and 177m northern) discharging to terminal armoured soakage fields.
- Temporary damming, dewatering and diversion of tributary flows during crossing and trenching works, using sandbag or hydro-barrier coffer dams with flows pumped or gravity-fed past the works area, each crossing expected to take up to two days.
- Two existing crossings on the Rastus Burn (one culvert and one splash crossing) requiring trenching for services and reinstatement, involving approximately 16m of instream disturbance.

4. Overview of DOC's report

4.1 A complex freshwater fisheries activity approval is required due to the nature of in-stream structures proposed. DOC agrees with the applicant's assessment that there are no fish present

at the altitudes at which the structures are proposed. DOC does not recommend any conditions on the freshwater fisheries approval. However, DOC seeks good practice be adhered to in order to manage risks to freshwater values and habitat. This could better be controlled through resource consent conditions.

5. Complex freshwater fisheries activities

- 5.1 Schedule 9 clause 7 of the Act denotes a complex freshwater fisheries activity approval is deemed to be issued under regulation 42 or 43 of the Freshwater Fisheries Regulations 1983.
- 5.2 Each of the weir and the reservoir inflow diversion falls within the definition of a dam or diversion structure for the purposes of regulation 43, and each culvert and ford falls within regulation 42.

6. Assessment

- 6.1 Schedule 9, clause 4 of the Act sets out what this report must include.

The alignment of the proposed activity with best practice and the New Zealand Fish passage Guidelines (clause 4(a))

- 6.2 The applicant's position, recorded in A-19, is that because no fish are present at the altitudes at which the structures are proposed, the structures do not and could not impede fish passage, and consideration of the New Zealand Fish Passage Guidelines is therefore not required.
- 6.3 The trigger for a complex freshwater fisheries activity approval is not premised on the present distribution of fish but on what is to occur in the waterway. The assessment below proceeds on the basis that the approval is required notwithstanding the absence of fish.
- 6.4 The New Zealand Fish Passage Guidelines set out the best-practice approaches and design standards for providing fish passage at instream structures. The Guidelines provide a basis for developing suitable infrastructure designs in the majority of situations regularly encountered in New Zealand.
- 6.5 DOC accepts that the evidence supports an absence of fish at the structure locations and that this removes the need to design and construct the structures in accordance with the Guidelines.
- 6.6 However, DOC considers that best practice should still be adhered to given the sensitive environment the activities will take place in. Several of the design features that the Fish Passage Guidelines promote, including bed-level continuity through culverts, avoidance of perched outlets, avoidance of downstream scour, and retention of natural substrate, also protect the macroinvertebrate, algal and bryophyte communities that are the principal biological values of these streams. Those features should be adopted regardless of fish presence.

The management of risks to freshwater values or habitat, including prevention of access to or spread of invasive species (clause 4(b))

- 6.7 **Sediment and instream disturbance** The streams carry almost no fine sediment, and the biological communities present are adapted to clear, cold water. Trenching 2 m deep and 1 m wide through a dewatered channel has the potential to mobilise relatively more sediment than the surface footprint alone would suggest. DOC considers the applicant's proposed measures - isolation of each crossing with sandbags or hydro barriers, flows pumped or gravity-fed past the works area, diversion of clean water around disturbed ground, and routing of sediment-laden water to sediment sumps or equivalent - to be appropriate in principle. However, the sediment discharge limits proposed in the draft CEMP (with erosion and sediment controls therein) are insufficient (<150 NTU) given the receiving waterways are extremely clear (<10 NTU).
- 6.8 **Cement and concrete** Concrete bulkheads are proposed within trenches, and cement will be placed to set in situ. Fresh or uncured concrete, slurry, cement and washings release alkaline leachate that is acutely toxic to aquatic invertebrates. Given the very low conductivity and low buffering capacity of these waters, in Dr Kavazos's opinion the risk of localised mortality is material if this is not controlled. DOC recommends that cement, concrete and washings are excluded from flowing water, requiring full dewatering before placement, and requiring high-alkalinity water to be tankered offsite for trade-waste disposal.
- 6.9 **Invasive species** – Didymo (*Didymosphenia geminata*) is found in the Rastus Burn and the Doolans Creek Right Branch. The tributaries where the stream crossing are proposed are currently Didymo free. Didymo can easily be transferred between waterways by vehicles and construction machinery. DOC recommends that Check-Clean-Dry protocols are in place to prevent further spread of Didymo during both the construction and operational phases.
- 6.10 **Stormwater and contaminants** Roof runoff from the base buildings and gondola stations is to be discharged via pipework to nearby streams. Colorsteel® roofing leaches low concentrations of zinc and copper, which can increase with age and without regular maintenance. Given the naturally very low background metal concentrations in these waters, DOC recommends the use of suitable roofing, flashing, gutter and fixing materials; first-flush diversion or treatment at commissioning; monitoring extended across the life of the consent at reducing frequency rather than ceasing at two years; and monitoring of metals in deposited fine sediment, which integrates exposure over time better than event-based water sampling.

The availability and quality of the habitat upstream and downstream from the proposed activity (clause 4(c))

- 6.11 The applicant has provided information on the water quality and quantity in the surrounding habitat.
- 6.12 The data and information provided by the applicant aligns with information held by DOC, in particular regarding the distribution of fishes.

The presence of threatened, data-deficient, or at-risk species under the New Zealand Threat Classification System in the vicinity of the proposed activity (clause 4(d))

6.13 The Applicant has provided information below on species present in the vicinity of the proposed activity, as summarised in the table below:

Common name	Scientific name	Number surveyed (if provided)
Stonefly	Zelandobius macburneyi	Tarn 2, Tributary C (culvert B) and Doolans Creek

The advantages and disadvantages of providing fish passage upstream or downstream of the proposed activity (clause 4(e))

- 6.14 DOC considers that the maintenance of passage sufficient for freshwater fishes is not necessary. The affected waterways are above 1,300 m a.s.l. which is above the altitudinal limit for fishes. The absence of fish in this basin is a natural phenomenon and not associated with downstream impediments to passage or poor habitat quality.
- 6.15 Adhering to the Fish Passage Guidelines will however ensure crossings are built following best practice. This will ensure culverts are designed properly so that natural bed and substrate processes in the waterways will continue, reduce the likelihood of culverts perching and minimise scouring of riparian margin within the affected waterways. Adopting best practice of instream structures is most likely to maintain ecological integrity of the streams.

7. Conditions

Conditions in accordance with Schedule 9, clause 6 of the Act

- 7.1 The Panel may impose conditions under Schedule 9, clause 6 of the Act on an approval that the panel considers necessary to manage the effects of the activity on freshwater fish species, taking into account:
- Best practice standards; and
 - The New Zealand Fish Passage Guidelines.
- 7.2 The application has not suggested any conditions on the complex freshwater fisheries approval. DOC is satisfied with this but seeks to ensure that the adverse effects that can be created by instream structures are appropriately managed by conditions on any resource consents granted, and will provide comment further comment on that in its s53 comments.