



**A SUBMISSION FROM THE
CENTRAL SOUTH ISLAND FISH AND GAME COUNCIL**

SUBMITTER: Central South Island Fish and Game
c/o Angela Christensen

This submission is made in reference to the Draft Dog Control Bylaw and Policy.

STATEMENT OF SUBMISSION

Central South Island Fish and Game Council (hereafter referred to as 'Fish and Game') is the statutory manager of the sports fish and game resource as directed by the Conservation Act 1987. Fish and Game's legislative functions includes maintaining and improving access in the recreational interests of anglers and hunters (s26Q). Fish and Game's interest in the draft bylaw is focussed on the impacts it will have on our game bird hunters.

The purpose of the draft Dog Control Policy is to 'maintain a safe and healthy community, to protect children, and to provide the for the needs of dogs and their owners.' Section 7 'Prohibited and leashed areas' lists a number of locations where dogs are prohibited. However, this list differs to the prohibited areas identified in 'Schedule 1 Part A- Areas where dogs are prohibited' as Ashton Beach is listed in the Schedule but not in Section 7. Ashton Beach is of most interest to Fish and Game given the recreational game bird hunting opportunities undertaken in the riverbed at and near that location. This is discussed further below.

The purpose of the draft bylaw is outlined in Section 2. Of particular interest to Fish and Game is the purpose stated as follows:

- *minimise the potential for dogs to cause harm, distress or nuisance to the community, animals or wildlife*

Fish and Game supports the purpose stated above; however, the impacts on recreational opportunities that arise from dogs being prohibited in an area where there is little to no risk to community, animals or wildlife should be considered.

Section 8.1 of the draft bylaw designates prohibited areas for dogs as specified in Schedule 1 Part A. Ashton Beach has been added to this schedule. The consultation document states the reasoning behind adding this location to the schedule is to protect the breeding colonies of the threatened, black-billed gull. The black-billed gull is one of many braided river bird species that establishes breeding colonies at the Ashburton River. Other braided river bird species at the river mouth include wrybills, dotterels, oystercatchers, terns and pied stilts. Every spring, native river birds come to braided rivers to breed, which takes place from early September to late January.

A report commissioned by Environment Canterbury¹ details the black-billed gull population over a year-long period during 2018/2019 at the Ashburton River mouth. From this snapshot report, black-billed gull numbers drop in May and June as they move to other sites for feeding. An excerpt from the report states:

***Black-billed Gulls** dropped to <10 in May and June as birds moved to winter feeding habitat in farmland and they were replaced by unusually large numbers of **Red-billed Gulls** which peaked at 364 on 21 July 2018. Following their annual cycle, **Black-billed Gulls** returned en masse in late August when 4498 were counted. This almost doubled to 7130 in mid September when nest-building started but the first breeding attempts were subsequently washed out by a series of freshes. Many birds moved upstream and eventually formed a colony at the State Highway 1 bridge, but 2000-2500 remained at the rivermouth and bred between November and January. Up to 200 **Red-billed Gulls** were associated with this colony and 75 pairs bred in two sub-colonies on the edge of the Black-bills.*

¹ Andrew Crossland, “Ashburton Rivermouth Bird Monitoring Report for Year April 2018-March 2019”, prepared for Environment Canterbury (May 2019).

Black-billed Gull numbers declined through February as breeding was completed and birds moved away. As with last year, they were overtaken as the most abundant species in autumn by **Red-billed Gulls**, which had a stable flock of c.100 birds from January through March.

Game bird hunting is a valued recreational pursuit in the Central South Island Fish and Game Region. Riverbeds and ponds are popular sites to undertake this activity as they provide suitable habitats and food supply for game bird species. The game bird hunting season runs from the 1st Saturday in May through the last weekend in July. It is during this time that hunters have the opportunity to hunt game bird species as defined in Schedule 1 of the Wildlife Act 1953. Fish and Game's Game Bird Hunting Code of Practice requires game bird hunters to retrieve all shot birds promptly and many hunters utilise specially trained dogs to achieve this.

As the river bird breeding season differs to the game bird hunting season, Fish and Game believes there is minimal risk for dogs to cause harm, distress or nuisance to wildlife at the Ashton Beach location from May through July.

Fish and Game seeks that a time period is applied to the Ashton Beach prohibited area for dogs. Fish and Game supports dogs being prohibited from that location from August-April inclusive to protect threatened river bird species. Fish and Game seeks dogs are permitted for game bird hunting purposes from May-July inclusive. This would meet the policy, continue to allow for recreational hunting opportunities, and minimise adverse effects on wildlife.

Hearing

CSIFG reserves the right to be heard in support and expansion of this submission.

Date: 28 June 2021