

Submission on the Canterbury Regional Council River Gravel Extraction Code of Practice (CoP)

April 2026

Introduction

The Aggregate and Quarry Association (AQA) is the industry body representing construction material companies which produce an estimated 48 million tonnes of aggregate and quarried materials consumed in New Zealand each year.

Funded by its members, the AQA has a mandate to increase understanding of the need for aggregates to New Zealanders, improve our industry and users' technical knowledge of aggregates, and assist in developing a highly skilled workforce within a safe and sustainable work environment.

Key points of our submission

- We support the intent to streamline and simplify the process for gravel extraction applications. We have concerns however that some proposed provisions will work contrary to this intent.
- Assessing potential effects of extraction on coastal erosion is the responsibility of ECan under its RMA roles and responsibilities and should not be arbitrarily delegated to an applicant.
- We are concerned at the proposed reduction in timeframes which may mean insufficient time to account for changes in the river, contract variations or mechanical breakdowns that cause a pause in extraction.

We make the following submission in relation to the draft Canterbury Regional Council (ECan) River Gravel Extraction Code of Practice.

General comments

We support the intent to streamline the CoP, however the South Canterbury Memorandum of Understanding (SCMOU) is fundamental to the original CoP and a catalyst for Gravel Authorities (GAs). The CoP should retain reference to the SCMOU within the body of the CoP.

The draft CoP appears to require additional assessment matters for GAs although in places it is hard to differentiate which matters relate to resource consent applications and which relate to GA applications. These additional assessment matters increase the costs and time required to prepare applications and so potentially increase flood risks by delaying/disincentivising river gravel extraction. They also defeat the original agreed purpose of the CoP which was to simplify and streamline the approval process.

Specific areas of concern

Sect 2.5 Fees and charges

There are times when delays in the issuing of a gravel authorisation (GA) occur that are beyond the control of the applicant including administrative delays, flooding and bird nesting restrictions. On such occasions the gravel has not been extracted and the application may be replaced by a new application in the same area. There should be discretion for ECan to waive fees in such situations. We recommend the following additional bullet point in 2.5, Discretion to waive fees:

- *Where, due to delays by ECan in issuing the gravel authorisation or flooding or bird nesting restrictions, the gravel has been unable to be extracted and a new gravel authorisation has been issued for the same area and gravel quantity.*

Sect 2.11.1 Ecology

When assessing ecological assessments for extraction sites, greater consideration should be given to areas where assessments have previously been undertaken for the same activity to maintain the principles of simplification of the process.

The areas to which GAs apply have been restricted to those that are known to be pressure points for flooding hazard mitigation and not fish spawning areas. The effects should be well known given the volume of GAs granted and we therefore don't support the requirement for a natural character assessment after the proposed activity occurs.

Sect 2.11.2 Coastal erosion

We are deeply concerned about this section as it signals a shift by ECan towards passing responsibility for assessing potential effects of extraction on coastal erosion to the GA applicant. ECan acknowledges, on one hand, the level of uncertainty around this and is working to fill that knowledge gap, and on the other hand, is placing the onus on extractors to do that work *"if they involve relatively large scale extraction within 5 km of the coast"*.

"Large scale extractions" is not defined and the requirement for applicants to commission this work will invariably lead to uncertainties and disagreements between consultant and Council technical experts on conclusions reached. This will increase timeframes and costs and is likely to render these applications uneconomic. The approach taken in this section is strongly opposed and should be reconsidered.

Assessing potential effects of extraction on coastal erosion is the responsibility of ECan under its RMA roles and responsibilities and should not be arbitrarily delegated to an applicant.

Sect 3.3 Extraction conditions

We do not support the decrease in time from 14 days to 8 days in conditions 1 and 11. Eight days is insufficient time to account for changes in the river, contract variations or mechanical breakdowns that cause a pause in extraction and may unnecessarily hold up continued extraction. This becomes especially onerous when combined with the increase in notification from 2 to 5 days (condition 1). These conditions should also refer to working days.

Condition 4 requires a 200mm gravel overlay at stopbank crossing points. In the majority of cases, crossings are already established, and placing gravel on top of the existing track does little to manage flood risk. This provision should be amended to require 200mm of gravel on top of the crest of the stopbank only in the case of new access points or at the direction of the river engineer.

Schedule 1 Bird Survey requirements

In section 3, Exception Criteria, the inclusion of “AND CRC Land Ecology Scientists consider the likelihood of nesting birds is very low” adds an unnecessary extra step to the process with no timeframe for response. The criteria is already robust, and we consider this inclusion to be unnecessary and should be removed.

Schedule 3 Fish protections

The 10m setback proposed will make the extraction of material from many smaller waterways such as the Waihi River and narrow stretches of other rivers difficult to achieve, exacerbating the potential for poor outcomes during a flood event.

In other regions of New Zealand councils allow 1-5 metre setbacks from flowing water and extraction below water level. In the case of 1 metre setbacks there are water clarity visual clarity tests and reporting to step this distance back in 0.5 metre increments should water clarity be affected.

A risk-based approach would provide a better overall outcome as it still stops sedimentation of the main channels while allowing reasonable extraction from a range of waterways (thereby mitigating flood risk) and providing a narrower barrier for the river to break through.

In relation to timing restrictions, gravel extraction does not take place in flowing water and so should not affect fish migration. Accordingly, the exclusion periods imposed through timing restrictions are unnecessary and should be removed.

Wayne Scott

Chief Executive Officer

[Aggregate and Quarry Association](#)

wayne@aqd.org.nz

021 944 336