



Submission to
the Ministry for the Environment
on the
Clean Water consultation document (2017)

Date: 28 April 2017

Tourism Industry Aotearoa (TIA) welcomes the opportunity to comment on the *Clean Water consultation document (2017) and the accompanying National Policy Statement for Freshwater Management 2014*. TIA is a long standing plenary member of the Land And Water Forum (LAWF).

This submission is filed without prejudice to TIA's future position. Our ability to prepare a comprehensive submission responding to the consultation document relied on the provision by the Ministry for the Environment of information relevant to the connection between the Clean Water consultation document 2017 including the National Policy Statement for Freshwater Management 2014 and the benefits that would accrue. If any information is provided at a later date, TIA reserves the right to comment further.

EXECUTIVE SUMMARY

1. TIA supports the intent and 'direction of travel' of the government Clean Water programme and the revised National Policy Statement (NPS). Setting standards, monitoring and managing for improvement is the right approach for driving water quality improvement over time.
2. We are concerned to see the Government does not fully understand or appreciate the importance of fresh water to the New Zealand tourism industry.
3. TIA is stunned to see that the tourism industry is not being perceived as one of the industries that rely on fresh water quality in the economic criteria used to identify vulnerable catchments for water bodies appropriate for applying for the Freshwater Improvement Fund. This shows a disturbing lack of understanding of the importance of fresh water to the tourism industry and how important the tourism industry is to the New Zealand economy.
4. We are disappointed to see the disconnect between the LAWF recommendations and the resulting government policy. TIA is of the opinion that this undermines the overall fresh water management outcomes and the value that the LAWF provides to the Government.
5. The consultation document and the NPS do not give TIA the assurance that all essential New Zealand values and needs will be met.
6. We are of the opinion that the Government's statement of '90% of rivers swimmable by 2040' is misleading.
7. TIA questions whether improving the swimmability of large waterways will result in an improvement of swimmability of all tributaries.
8. Central Government needs to provide the regional councils with guidelines, standards, methodology, regional targets and a regional mitigation plan template.

9. TIA is of the opinion that the Government commitment of \$350 million to clean up or protect some of New Zealand's lakes and rivers seems insufficient to bring about the required changes.
10. The Government needs to undertake work to better support understanding of the economic value of fresh water to tourism, both at a national and regional level, and how to integrate this understanding into fresh water management processes – particularly when looking at establishing best economic use and high value use of water, including the effects on the natural landscape of changed water use, storage and infrastructure.
11. TIA finds it concerning that the proposed NPS gives 'economic well-being' and 'productive economic opportunities' the same status as 'environmental well-being'.
12. The proposed timeframe does not seem to reflect the urgency to increase the quality of New Zealand's waterways.
13. The Government's support for further intensification of agricultural land use appears to undermine their efforts to maintain or improve the country's fresh water standards.
14. TIA is pleased to see the proposal reflects the significance of Te Mana o Te Wai.

RECOMMENDATIONS

15. The current consultation document and the accompanying NPS need to be revised to better reflect the importance of the tourism industry to the New Zealand economy and the importance of fresh water to the success of the tourism industry. There need to be tourism-specific actions in the NPS for Freshwater Management, plus the National Science Challenge needs to include tourism.
16. The recommendations made by the Land And Water Forum in August 2016 and in their submission on the current consultation document and NPS for Freshwater Management need to be implemented in an integrated fashion and with urgency.
17. The final NPS for Freshwater Management needs to include a section that requires regional councils to identify, through public consultation, all popular spots for primary interaction that recreationalists (local, domestic and international visitors) use or could use. These sites need to be captured by the improvement targets in the NPS and clearly identified and located on regional maps.
18. The focus for the final NPS for Freshwater Management should not only be on swimmability, but on the broader range of considerations and measures to manage for potability (drinkability), extraction for agricultural, industrial and urban uses, and ecological and aesthetic considerations.
19. The swimmability table on the website of the Ministry for the Environment needs to be legally part of the NPS for Freshwater Management.

20. Central Government needs to provide strong leadership and assistance to regional councils by providing guidelines, standards, methodology, regional targets and a regional mitigation plan template to identify specific targets for improving the swimmability of their waterways and the mitigations used to get there.
21. The high costs associated with 'cleaning up' poor quality fresh water indicates that this is an issue that will require considerable Central Government support. The Government needs to gather sound and tested evidence to ensure their contribution to the cost of cleaning up and protecting the waterways will bring about the required changes. It should accept that this should be subject to change depending on the most relevant and current information available. The evidence gathering by the Government should not impede the need for urgent action to be taken to ensure the current standards do not decline.
22. The economic criteria used to identify vulnerable catchments for water bodies appropriate for applying for the Freshwater Improvement Fund need to include the tourism industry.
23. Central and regional government need to consider tourism when making resourcing and planning decisions that impact on fresh water and need to understand the importance of fresh water to New Zealand tourism.
24. Work needs to be undertaken to better support understanding of the economic value of fresh water to tourism, both at a national and regional level, and how to integrate this understanding into fresh water management processes. The results of this work must be integrated into the guidance referred to in point 21.
25. The proposed timeframes need to reflect the urgency to increase the quality of New Zealand's waterways. The current time frames do not reflect the importance of the fresh water resource to the tourism industry nor seem to reflect what New Zealand aspires to be from a social, cultural, environmental and economic point of view. As an example, compulsory stock exclusion needs to be implemented within shorter time frames.
26. The Government needs to review its other policies that affect New Zealand's fresh water resource including those that support further intensification of agricultural land use and ensure that these policies align with the aims of the NPS for Freshwater Management.

INTRODUCTION

27. Tourism Industry Aotearoa (TIA) is the peak body for the tourism industry in New Zealand. With over 1,500 members, TIA represents a range of tourism-related activities including hospitality, accommodation, adventure and other activities, attractions and retail, airports and airlines, as well as related tourism services.
28. The primary role of TIA is to be the voice of the tourism industry. This includes working for members on advocacy, policy, communication, events, membership and business capability. The team is based in Wellington and is led by Chief Executive, Chris Roberts.
29. Any enquiries relating to this paper should in the first instance be referred to Nienke van Dijken, TIA Policy Analyst at nienke.vandijken@tia.org.nz or by phone on 04 494 1842.

COMMENT

Tourism 2025

30. Tourism 2025 (www.tourism2025.org.nz), an industry-led, government supported economic growth framework was launched in New Zealand in 2014 and has set an aspirational goal of reaching \$41 billion in annual tourism revenues by 2025. The industry's focus is on growing value faster than volume.
31. The Tourism 2025 growth framework is based around five key themes which are Insight, Connectivity, Productivity, Visitor Experience and Target for Value. This growth framework has recently been reviewed ([Tourism 2025-two years on](#)). While the five themes of the framework remain unchanged, the emphasis in some focus areas has shifted. Sustainability is one of the themes now being given greater emphasis. There is a desire and expectation that long term sustainability, from an economic, environmental, cultural, and social aspect, is becoming a core value against which all decisions are being tested.

Our understanding of the issue

32. TIA understands that this consultation document aims to set out the Government's further work in the ongoing programme of water reform following consultation on Next steps for fresh water (2016).
33. We understand that this consultation document has five key components:
- A new target that 90% of New Zealand's rivers and lakes are swimmable by 2040.
 - New maps and information on the current water quality for swimming.
 - Changes to the National Policy Statement for Freshwater Management including water quality requirements for recreation, limiting nutrients and for ecological health.
 - Criteria for allocation of the \$100 million Freshwater Improvement Fund.

- Details of new national stock exclusion regulations.

34. TIA is concerned that:

- The Government does not fully understand the importance of the tourism industry to the New Zealand economy and the importance of fresh water to the New Zealand tourism industry.
- The consultation document does not map over into tourism-specific actions in the National Policy Statement.
- The tourism industry is not being perceived as one of the industries that rely on fresh water quality in the economic criteria used to identify vulnerable catchments for water bodies appropriate for applying for the Freshwater Improvement Fund.
- The Government did not adopt many of the (key) recommendations made by the LAWF in August 2016, and that it did this without providing good reasoning for doing so.
- The Government has not undertaken any research on the economic value of fresh water to the tourism industry nor supplied any guidance for factoring Tourism into regional fresh water planning processes.
- The proposed National Policy Statement gives 'economic well-being' and 'productive economic opportunities' the same status as 'environmental well-being'.
- There is a lack of urgency reflected in the timeframes and the risk of further decline in fresh water standards.

General

35. TIA supports the intent and 'direction of travel' of the government Clean Water programme and the revised National Policy Statement (NPS). Setting standards, monitoring and managing for improvement is the right approach for driving water quality improvement over time.

36. Unfortunately, the consultation document and the revised NPS are conceptually flawed in its treatment of the tourism interests in fresh water. Tourism is mentioned through the documents, but this does not reflect what we consider to be the essential nature of the tourism/fresh water interface: that is, *what tourism needs from fresh water to ensure the sustainable growth of the tourism industry.*

37. In short, tourism is reliant on fresh water as part of the suite of resources that makes up 'Destination New Zealand'. Other attributes are environmental such as landscapes, mountain, beaches, and social such as friendly people and safety. As such, the quality of how we manage fresh water is inherently tied to the well-being of the tourism industry in the minds of our visitors.

38. The consultation document and the NPS need to capture this concept. In so doing, the documents should describe the nature of the tourism usage – that it is largely non-extractive, that the majority of the value of the tourism/fresh water interface is as 'water in the landscape' that contribute to landscape/destination attractiveness,

that it is safe for participating in for commercial and non-commercial activities and that it sustains healthy nature.

39. In so doing, the NPS will be signalling that the wealth-generating capacity of the New Zealand system will be enhanced from ensuring quality fresh water resources. In this, the principle that value accrues from non-extractive use of water, and that the tourism industry is a primary means of monetising this value. This is a secondary or tertiary-level of value, but it exists equally in its tangible value to the New Zealand economy. We recognise that this is much less tangible to measure than some other direct or primary water uses (such as irrigation) but that value ultimately achieved is just as real.

The importance of fresh water to the tourism industry

40. As noted, fresh water is a pivotal resource for the tourism industry. Fresh water and healthy fresh water ecosystems are fundamental to supporting our natural landscapes – it is an essential and valuable aspect of 'infrastructure' for a sustainable and economically successful tourism economy.

41. Tourism is a non-consumptive conduit between conservation, recreation and economic development. Tourism relies upon fresh water as a basic resource and it also provides a means for people to enjoy the resources and to monetise value from these resources.

42. Tourism is a highly competitive global industry. New Zealand's environment is our unique selling point and underpins the tourism industry's 100% Pure New Zealand marketing proposition. Data from the International Visitor Survey conducted for the Ministry of Business Innovation and Employment (MBIE) shows that the top factor for influencing visitors to choose New Zealand is our natural landscape and scenery.

43. Fresh water is also integral to many specific products in New Zealand's iconic and high value adventure tourism industry and to New Zealand's world class guided fresh water fishing industry. Tourism New Zealand data shows that in 2016, 28% of all tourists (both domestic and international) took part in raft, kayak, canoe, jet boat or fresh water fishing activities. These visitors are high value – they stayed an average length of 31 days and spent an average of \$4800, well above the norm.

44. Although we are pleased to see that in the current consultation document the Government attempts to acknowledge the importance of the tourism industry to the New Zealand economy and the importance of fresh water to the tourism industry, we are concerned that the consultation document does not map over into tourism-specific actions in the NPS. TIA is concerned that the tourism perspective gets lost in the NPS. This lack of detail makes us question whether the Government fully understands the importance of the tourism industry to New Zealand, the importance of fresh water to the tourism industry and how much our reputation as a green and clean destination is at stake.

45. TIA is stunned to see that the tourism industry is not being perceived as one of the industries that rely on fresh water quality in the economic criteria used to identify vulnerable catchments for water bodies appropriate for applying for the Freshwater Improvement Fund. This shows the Government's lack of understanding of the importance of fresh water to the tourism industry and how important the tourism industry is to the New Zealand economy.
46. Section 6.3 refers to the National Science Challenge – Our Land and Water. This will be very important in future guiding science investigations relating to water. TIA considers it essential for tourism to be included within this section in order to let future funding decision makers know that tourism is within scope of this Science Challenge investment. The tourism perspective is completely lost within this Science Challenge and this is very concerning to TIA.
47. TIA supports maintaining or improving national fresh water quality towards standards that support the health of our natural landscapes, supports a healthy sustainable nation and enable safe (healthy) visitor interaction - for now and for future generations. Tourism values are consistent with the aim of having fresh water that sustains fishing, swimming and mahinga kai/food gathering.
48. The consultation document and the NPS do not give TIA the assurance that all essential New Zealand values and needs will be met – that there will be bottom lines to protect the mana and ecological health of our rivers, streams, lakes, aquifers and wetlands; that we will be able to fish, swim and gather food; that provision will be made to protect outstanding water bodies; and that, over time, the quality of our water will improve.

Government's intention to improve water management

49. TIA believes that New Zealand can achieve great things by consciously giving primacy and dominance to the preservation and enhancement of our natural resources. In a highly modified, resource-constrained world, New Zealand has a unique opportunity to show, in a planned and deliberate way, environmental leadership and integrity. Such a move would secure a powerful high-value trading proposition for tourism and across many other New Zealand industries, support our nation's social health and ensure our next generation inherits a land that is better than today. As such, TIA is pleased to see that the Government intends to improve water management in New Zealand.
50. We are disappointed to see that the Government did not adopt many of the (key) recommendations made by the LAWF in August 2016, and that it did so without providing good reasoning for doing so. Adopting a few of the LAWF's recommendations but not others risks the fresh water management aims and also risks the loss of consensus and the constituency for change that the LAWF process has generated.

51. These recommendations are based on expert science and technical advice and agreed through consensus by the members of the LAWF. We support these recommendations and we are of the opinion that these recommendations could improve the way fresh water in New Zealand is managed.
52. It is disappointing to see the disconnect between the LAWF recommendations and the resulting government policy and TIA is of the opinion that this undermines the overall fresh water management outcomes and the value that the LAWF provides to the Government.
53. The fact that important environmental groups such as Forest & Bird, Fish and Game, Federated Mountain Clubs and Environment and Conservation Organisation (ECO) have left the LAWF because of this disconnect is very concerning and undermines the legitimacy of the forum. Successful outcomes of fresh water management depend on reaching decisions which are widely shared, and reflects national, regional and local preferences.

Misleading government statement

54. We are of the opinion that the Government's statement of '90% of rivers swimmable by 2040' is misleading. The '90% rivers swimmable by 2040' applies to '*rivers that are fourth order or above, and lakes larger than 1.5km in perimeter on average*'. This limitation excludes the majority of New Zealand's waterways and as such, excludes many rivers and streams that many people use for recreational activities that involve primary contact with water.
55. In actual fact, the '90%' only applies to about 10% of New Zealand's total fresh water. This means that the target of swimmable rivers by 2040 only applies to a total of 10% of New Zealand's waterways.
56. Although this may well mean that higher order rivers are managed well, this is by no means certain as dilution factors will heavily influence the importance of the health of any one tributary.
57. This misleading Government statement is not useful for the open debate about fresh water that New Zealand needs to have and undermines the consultation process. In our opinion, '10% of rivers swimmable by 2040' is a very poor goal and lacks any ambition.

'Swimmability'

58. As noted, fresh water is integral to New Zealand's tourism industry. Not only is it used for swimming, but also for many other activities such as fresh water fishing, rafting, kayaking, canoeing, jet boating etc. These activities can involve full immersion in the water as well and swimming is just one of the many activities that involve primary contact with water.

59. We strongly support the feedback provided by LAWF, Environmental Defence Society (EDS) and Forest & Bird on the proposed changes to the NPS in terms of swimmability.
60. One of our biggest concerns around the proposed changes to the NPS in terms of swimmability is that it only applies to a fraction of the rivers and lakes where people are likely to be involved in swimming or any other recreational activity that involves primary contact with water.
61. We do not agree with the statement that improving the swimmability of large waterways will result in an improvement of swimmability of all tributaries. For example, many smaller rivers that contain popular recreation spots flow directly into the sea instead of into fourth order rivers.
62. Without doing extensive research it is difficult to know whether tourism's key assets will be protected under the river fourth order, 40cm depth and lake size NPS parameters. Tourism's fresh water assets must be monitored and managed towards swimmable targets. We need 'tourism' to be explicitly identified as requiring consideration when councils are prioritising waterways for limits and management plans. Relying on the NPS section parameters does not give us sufficient confidence that the tourism industry's needs will be met.
63. We recommend the final NPS for Freshwater Management also includes a section that requires regional councils to identify, through public consultation, all popular swimming spots that recreationalists (local, domestic and international visitors) use or could use. These sites need to be captured by the improvement targets in the NPS and clearly identified and located on regional maps.

Swimmability is not the only important factor

64. Swimmability is not the only important factor of fresh water. Yes, we want fresh water that is safe for recreational activities that involve primary contact with water. We also want sufficient water quality and visually clean rivers and lake water - tourism is concentrated on lakes, rivers and water-fed landscapes and corridors, e.g. lakes, rivers, the mountain to the sea experiences etc. Furthermore, having healthy fresh water habitats for wildlife is also important to the tourism industry.
65. We agree with the statement in the report on fresh water by Sir Peter Gluckman¹ that *a much broader range of considerations and measures is needed to manage for potability (drinkability), extraction for agricultural, industrial and urban uses, and ecological and aesthetic considerations. Swimmable is not a useful measure for every type of water use.*

¹ Office of the Prime Minister's Chief Science Advisor, *New Zealand's fresh waters: Values, state, trends and human impacts*, 12 April 2017 - as sourced from <http://www.pmcsa.org.nz/wp-content/uploads/PMCSA-Freshwater-Report.pdf>

Swimmability table and tests

66. In public statements, the Government indicated swimmability will be assessed through a table with accompanying tests on the website of the Ministry for the Environment (MfE). This table is not included in the consultation document and the consultation document has not been withdrawn, amended and re-notified. As such, the Government is not consulting on this swimmability table and the accompanying tests.

67. As this swimmability table and accompanying tests are not part of the consultation document and NPS, TIA is not sure whether this table is legally part of the NPS and whether it is legally enforceable. TIA recommend for the Government to provide clarity on this. We also recommend for the Government to get input from the LAWF and the organisations that left the LAWF such as Forest & Bird.

Monitoring requirements and mitigation plans

68. Regional councils will be required to identify specific targets for improving the swimmability of their waterways and the mitigations they will use to get there.

69. There is no single set of fresh water quality monitoring methods that regional councils use to measure fresh water quality, and no nationally agreed guidelines, standards, or methodology for analysing and reporting regional fresh water quality data at the national level.

70. TIA is of the opinion that Central Government needs to provide these guidelines, standards, methodology, regional targets and a regional mitigation plan template as regional councils cannot be expected to develop these themselves. This would mean a significant cost for councils and communities as they try to cope with a lengthy consultation and development process.

71. A national approach would prevent a patchwork of confusing and inconsistent guidelines, standards, methodology, targets and mitigation plans being applied and provide certainty for everyone. The regions need strong leadership from Central Government.

72. The regional councils' specific targets for improving the swimmability of their waterways and the mitigations they will use to get there will be in plans, not in actual law. TIA is not sure whether these plans will be legally binding and as such we question whether these plans will actually lead to action and subsequently to an improvement in fresh water quality.

73. There is also no regulatory clarity on how existing fresh water management plans of regional councils need to be re-opened, amended and re-notified.

Fresh water objectives below the national bottom

74. Policy CA3 refers to Appendix 3 when discussing how it would be appropriate for regional councils to set their fresh water objective below the national bottom line. Unfortunately Appendix 3 in the NPS has not been populated.
75. As this information is not currently available, we cannot provide feedback on this. If any information is provided at a later date, TIA reserves the right to comment further.

Fresh water funding

76. The Government has committed more than \$350 million to clean up or protect some of New Zealand's lakes and rivers, including a \$100 million Freshwater Improvement Fund. Although TIA is pleased to see that the Government made a Freshwater Improvement Fund available, we would like to see the sound and tested evidence to ensure the prescriptive limit of the committed \$350 million and the \$100 million Fund and its criteria will bring about the required changes.
77. If we look at the *case studies* (p12) and *Examples of significant Government investment in freshwater protections and clean ups* (p24) in the consultation document, a \$350 million commitment including a \$100 million fund seems rather insignificant. The improvement of the quality of the Manawatu catchment came at a cost of \$46 million; the investment to clean up and protect Lake Rotorua came at a cost of \$72.1 million. In this context, \$350 million is insufficient to bring about the required changes.
78. As mentioned in our previous submission on fresh water (2016), the current picture shown by statistics on our fresh water quality, the positive results of existing fresh water support efforts, and the high costs associated with 'cleaning up' poor quality fresh water all indicate that this should be a priority for government spending.
79. As noted, currently there are no nationally agreed guidelines, standards, or methodology for analysing and reporting regional fresh
80. water quality data. If the Government does not know what the current status of all waterways in New Zealand is, how does it know how much money needs to be spent to clean up or protect these waterways?
81. How has the \$200,000 minimum funding request been decided on? Is the Government convinced that this will not exclude smaller projects that might provide better value for money?
82. The Government does not seem to accept that limits are subject to change depending on the most relevant and current information available. At the moment, only very limited information is available.

Economic value of fresh water to tourism

83. The Freshwater Improvement Fund is based on the principle that resources should be spent in the areas where they will achieve the greatest improvement in water quality per dollar spent.

84. As noted, it is disturbing to see that the tourism industry is not being perceived as one of the industries that rely on fresh water quality in the economic criteria used to identify vulnerable catchments for water bodies appropriate for applying for the Freshwater Improvement Fund. This clearly shows the lack of understanding of the importance of fresh water to the tourism industry and how important the tourism industry is to the New Zealand economy.
85. It is crucial that central and regional government consider tourism when making resourcing and planning decisions that impact on fresh water, and that government understand the importance of fresh water to New Zealand tourism.
86. The 'use' of fresh water by the tourism industry is largely non-consumptive and therefore difficult to measure in traditional economic models. A quantitative model is unlikely to adequately capture the value of fresh water to tourism; a narrative approach will likely be required.
87. TIA recommends that work is undertaken to better support understanding of the economic value of fresh water to tourism, both at a national and regional level, and how to integrate this understanding into fresh water management processes – particularly when looking at establishing best economic use and high value use of water, including the effects on the natural landscape of changed water use, storage and infrastructure.
88. This work on understanding and communicating the economic value of fresh water to tourism is urgent as this information is needed to inform council planning processes on limit setting, including establishing which waterways outside the fourth order requirement should be prioritised for monitoring and improvement.

Economic well-being

89. One of the Government's stated purposes for its proposed amendments is to provide for 'economic well-being'. Section 3.5 (p20) proposes for *'regional councils to consider the community's economic well-being when making decision about water quantity, deciding what level or pace of water quality improvements will be targeted, and when establishing freshwater objectives'*.
90. The statement of providing for economic well-being within environmental limits is concerning. TIA agrees with EDS suggestion² that the Objective A2 and B1 in the NPS should be something along the lines of *'Provide for economic well-being and productive opportunities only within environmental limits'*.
91. As noted, the nature of tourism usage of fresh water is largely non-extractive and the majority of the value of the tourism/fresh water interface is as 'water in the landscape' that contributes to landscape/destination attractiveness, that it is safe for participating in for commercial and non-commercial activities and that it sustains healthy nature.

² Environmental Defence Society, *DRAFT Submission Clean Water Consultation 2017 (DOC: ME1293)*, April 2017

92. As such, for regional councils to focus on the usage of fresh water by tourism will capture both economic well-being and environmental well-being. The tourism industry is a primary mean of monetising the value of fresh water. We recognise that this is much less tangible to measure than some other direct or primary water uses (such as irrigation) but that value ultimately achieved is just as real. In the case of tourism, there is a very large economic value gained by the mere existence of quality water resources.
93. We are concerned that according to the memorandum provided by Sir Geoffrey Palmer QC to New Zealand Fish and Game³, the proposal that regional councils need to consider the community's economic well-being when making decision about water quantity, water quality improvements and fresh water objectives is inconsistent with the Resource Management Act (RMA). This is definitely an issue that needs to be addressed by the Government before finalising the NPS. The NPS should be consistent with the RMA and they should not contradict each other. We support the suggestions made by Sir Geoffrey Palmer QC/ Fish and Game on this matter. While tourism may be beneficiary to the 'economic well-being' purpose, it does so from the perspective of its non-extractive use of the fresh water resources where the quality of the environmental stewardship is of primary interest.

Timeframes

94. TIA understands that we need to be realistic about timeframes and that not everything can or will happen right away. We are, however, concerned about the proposed timeframe for implementation in the consultation document. The timeframe does not seem to reflect the urgency to increase the quality of New Zealand's waterways and does not seem to reflect what New Zealand aspires to be from a social, cultural, environmental and economic point of view. We strongly urge the Government to review the proposed time frames.
95. The NPS only indicates when mitigation plans need to be finalised. The report by Sir Peter Gluckman on New Zealand's fresh water⁴ indicates that degrading trends outnumber improving trends. How will the Government make sure that the current quality of New Zealand's waterways does not decline any further? What action is being taken now? How is the Government making sure that the current quality of our waterways is at least maintained? Who will be held accountable for reaching the Government's promise of '90% of rivers and lakes swimmable by 2040'?

Keeping stock out of our waterways

96. As noted in our previous submission on fresh water (April 2016), we noted that requirements for fencing waterways be based on science that ensures the continued breeding of fish and that farmers be specifically and actively encouraged to,

³ Sir Geoffrey Palmer Queens Council, *Memorandum Re: National Policy Statement for Freshwater Management 2014 – proposed economic well-being amendments and the OECD report on New Zealand's environmental performance* – as sourced from <https://fishandgame.org.nz/assets/Uploads/Palmer-Geddes-opinion-on-proposed-NPSFW-amendments-10-April-2018.pdf>

⁴ Office of the Prime Minister's Chief Science Advisor, *New Zealand's fresh waters: Values, state, trends and human impacts*, 12 April 2017 - as sourced from <http://www.pmcsa.org.nz/wp-content/uploads/PMCSA-Freshwater-Report.pdf>

whenever practicable, fence off waterways in advance of the national timeframes and to develop riparian buffers.

97. Science supports the importance of removing cows from our waterways as a fundamental step in managing the health of our fresh water. From a visitor perspective, the quality of our tourism offering is seriously compromised when stock are seen in our waterways. Such is the breadth of interaction of visitors across New Zealand that any and all waterways which compromise human health are a risk to the tourism brand.
98. Because of this importance of removing stock from our waterways to the quality of tourism, TIA is of the opinion that compulsory stock exclusion needs to be implemented within shorter time frames. Currently, compulsory stock exclusion is proposed to follow a staggered basis through to 2030. We are of the opinion that stock exclusion should be implemented in the next few years – not in the next 13 years.
99. We are surprised about beef cattle exclusion having different time lines than dairy cow exclusion. It is unclear to us why a beef animal in a waterway is considered less damaging than a dairy cow in a waterway. Visitors do not distinguish between beef animals vs dairy cows in the waterways– both types would appear to be equally as damaging to the quality of our tourism offering.
100. Even though we support removing stock from our waterways, we are unsure how practical this will be, especially in the High Country. How does the Government see this occurring in sub-alpine land with rivers, gorges and areas prone to floods? Has the Government fully thought through the practicalities behind this proposal? As the LAWF and EDS point out, stock exclusion needs to be integrated with riparian management – as was recommended by the LAWF: *the Government should commission a review of existing riparian management and setback assessment tools to produce a new consolidated tool with mandatory national application.*

Intensification of agricultural land use

101. The Government's support for further intensification of agricultural land use appears to undermine their efforts to maintain or improve the country's fresh water standards. Agricultural land intensification consumes fresh water from New Zealand's waterways and has a negative impact on the quality of the fresh water.
102. TIA recommends that the Government reviews its other policies that affect New Zealand's fresh water resource including those that support further intensification of agricultural land use and ensures that these policies align with the aims of the NPS fresh water management.

Te Mana o Te Wai

103. TIA strongly supports Te Mana o Te Wai and we are pleased to see the proposal reflects the significance of Te Mana o Te Wai. This should be the foundation from which all decisions on fresh water are made. We are pleased to see the connection to the broader environment which is sustained by, and gives life to, that water body – *in using water, you must also provide for the health of the environment, the health of the water body and the health of the people.*

104. As noted, TIA is of the opinion that Central Government needs to provide strong leadership to the regions on guidelines, standards and methodology, etc. This also applies to Te Mana o Te Wai – the regions need assistance on how to interpret the Te Mana o Te Wai objectives and how to meet these objectives.

Comments on the specific sections of the proposal

105. Section 3.1, page 18
Include a tourism reference in this section. This should be titled, 'Swimming, recreation and tourism values'. Alternatively, there could be separate 'Tourism' value that sets out the particular nature and importance of the tourism/fresh water interface, as set out above.
106. Section 3.5, page 20
Include reference that the economic value generated by water use is not limited to extractive use. In the case of tourism, there is a very large economic value gained by the mere existence of quality water resources.
107. Section 3.8, page 21
Te Mana o Te Wai sets out a holistic view on freshwater resources that is highly aligned to the tourism industry view. The language of '*integrated and sustainable while providing for economic growth*' is in line with tourism expectations. In this, it includes values that are broader than those measurable by the chemistry-based regime set out in the monitoring programmes. TIA would like to know how Te Mana o Te Wai-related outcomes are to be measured?
108. Section 6.1, page 31
The third paragraph should include reference to the fact that the optimal 'allocation' from an economic perspective may not include any allocation or extraction at all. Value can be gained from both extractive use (e.g. for irrigation) and from non-extractive tourism use and this section needs to reflect that.
109. Section 6.3, page 31
This section needs to refer to tourism to ensure there is science support to support and enhance the tourism industry's wealth-generating use of fresh water resources. There are many questions that need to be addressed and which over time will establish empirically how, and to what extent, the tourism industry creates wealth from New Zealand's fresh water resources.
110. NPS Page 3, Preamble
We are pleased to see that 'values' are included in this section (and across the documents). However, it is confusing that there are a number of different values used, e.g. community values, local and national values, swimming and recreation values, as well as the values set out in Appendix 1 (refer next point). It should be clarified which 'values' are being meant when referring to 'values'.
111. NPS Page 12-13, A. Water quality, B. Water quantity
Objectives A2 and B1 should be along the lines of '*Provide for economic well-being and productive opportunities only within environmental limits*'.

112. Appendix 1, National Values and uses for fresh water
At very least, this needs to include a 'Tourism Values' section. This could be along the lines of:

"Tourism Value - Tourism relies upon natural resources, including fresh water, as a primary attribute of New Zealand as a destination for both international and domestic visitors. In so doing, tourism generates wealth nationally, regionally and within communities. It does so in a non-consumptive way and relies on the overall management of the fresh water systems to sustain the quality of the fresh water resource upon which it depends."

Endorsement of other submissions

113. TIA generally supports and endorses the submissions by the LAWf, EDS and Forest & Bird on the Clean Water consultation. We agree with the general comments and points raised in these submissions and urge the Ministry for the Environment to give them careful consideration.

Follow-up process

114. TIA wishes to participate further in any follow-up process, including any formal meetings, to ensure that the potential impacts on tourism are adequately represented.

BACKGROUND

115. Tourism for New Zealand is big business as the country's largest export sector. It is a major contributor to the New Zealand economy that will always be here and won't easily go offshore. Tourism takes the lead in promoting New Zealand to the world. The brand positioning built by a vibrant tourism industry has become an important source of national confidence and identity and a front window for "Brand New Zealand". Indeed, the clean and pure offer that is synonymous with New Zealand tourism has been widely adopted and used to promote New Zealand exports in a range of other industries as well.

116. The tourism industry delivers the following value to New Zealand's economy:

- Tourism in New Zealand is a \$95 million per day and \$34.7 billion a year industry. Tourism delivers around \$40 million in foreign exchange to the New Zealand economy each day of the year. Domestic tourism contributes another \$55 million in economic activity every day
- The tourism industry directly and indirectly supports 13.2% of the total number of people employed in New Zealand. That means 332,322 people are working in the visitor economy.
- Tourism is one of New Zealand's biggest export industries, earning \$14.5 billion or 20.7% of New Zealand's foreign exchange earnings (year ended March 2016).

End.