



Submission to
the Environmental Protection Authority
on the
application for a Water Conservation Order for the
Ngaruroro and Clive rivers

Date: 24th of August 2017

TOURISM INDUSTRY AOTEAROA

Level 4, 79 Boulcott Street, PO Box 1697, Wellington 6140, New Zealand

P +64 4 499 0104 www.tia.org.nz E info@tia.org.nz

Tourism Industry Aotearoa (TIA) welcomes the opportunity to comment on the application for a Water Conservation Order for the Ngaruroro and Clive rivers by the New Zealand Fish and Game Council, Ngāti Hori ki Kohupatiki, Whitewater New Zealand, Jet Boating New Zealand, and the Royal Forest and Bird Protection Society of New Zealand.

This submission is filed without prejudice to TIA's future position. Our ability to prepare a comprehensive submission responding to the application relied on the provision by the Environmental Protection Authority of information relevant to the connection between application and the benefits that would accrue. If any information is provided at a later date, TIA reserve the right to comment further.

EXECUTIVE SUMMARY

1. We strongly support this application and we are of the opinion that appointing a Water Conservation Order for the Ngaruroro and Clive rivers would improve the management of these rivers.
2. 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.
3. The Ngaruroro and Clive rivers holds values that are of significant importance to the tourism industry, such as wild, scenic and natural landscapes; excellent water quality; the opportunity for multi-day trips; outstanding angling; outstanding jetboating opportunities; and habitat for native birds and fish.
4. A Water Conservation Order for the Ngaruroro and Clive rivers would give assurance to the tourism industry that all essential New Zealand values and needs will be met for these two particular rivers.
5. We are pleased to see the recognition of tikanga Maori and the cultural and spiritual purposes in the application.
6. TIA recommends the Special Tribunal to the Minister for the Environment to grant the Order.

TOURISM INDUSTRY AOTEAROA

Level 4, 79 Boulcott Street, PO Box 1697, Wellington 6140, New Zealand
P +64 4 499 0104 www.tia.org.nz E info@tia.org.nz



RECOMMENDATION

7. TIA recommends that the Water Conservation Order for the Ngaruroro and Clive rivers be granted by the Special Tribunal to the Minister for the Environment.

INTRODUCTION

8. 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.
9. 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.
10. 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

11. 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.
12. 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 been reviewed ([Tourism 2025-two years on](#)) in 2016. While the five themes of the framework remain unchanged, the emphasis in some focus areas has shifted. Sustainability is one of the themes being given greater emphasis now. There is a desire and expectation that long term sustainability, from an

TOURISM INDUSTRY AOTEAROA

Level 4, 79 Boulcott Street, PO Box 1697, Wellington 6140, New Zealand
P +64 4 499 0104 www.tia.org.nz E info@tia.org.nz



economic, environmental, cultural, and social aspect, is becoming a core value against which all decisions are being tested.

Our understanding of the issue

TIA understands that:

13. The New Zealand Fish and Game Council, Ngāti Hori ki Kohupatiki, Whitewater New Zealand, Jet Boating New Zealand, and the Royal Forest and Bird Protection Society of New Zealand have lodged an application with the Minister for the Environment for a Water Conservation Order for the Ngaruroro and Clive rivers.

14. The applicants seek protection of:

- the entire length of the Ngaruroro River
- the tributaries and hydraulically connected groundwater to the Lower Ngaruroro River
- the 7km-long Clive River

15. The application is in recognition of the following outstanding values:

- significance in accordance with tikanga Maori
- cultural and spiritual purposes
- habitat for rainbow trout
- angling, amenity and recreation
- habitat for avifauna
- habitat for native fish
- boating amenity and recreation
- wild, scenic and natural characteristics, and
- scientific and ecological values

16. The applicants seek protection of these values through a number of conditions contained in the draft order appended to the application.

General

17. Tourism is reliant on fresh water as an integral component in the suite of resources that make up 'Destination New Zealand'. Other environmental components include landscapes, mountains, and beaches. There is also a strong social component to the

TOURISM INDUSTRY AOTEAROA

Level 4, 79 Boulcott Street, PO Box 1697, Wellington 6140, New Zealand
P +64 4 499 0104 www.tia.org.nz E info@tia.org.nz

tourism value proposition, such as friendly people and safety. As such, the quality of how fresh water is managed is inherently tied to the well-being of the tourism industry in the minds of visitors.

18. The nature of the tourism usage is largely non-extractive. A lot of the value of the tourism/fresh water interface is as 'water in the landscape' that contributes to landscape/destination attractiveness. Additionally, there is significant value in being confident in swimming/immersing in fresh water. That it is safe for participating in for commercial and non-commercial activities and that it sustains healthy nature are very important aspects to the tourism industry.
19. The wealth-generating capacity of the New Zealand system will be enhanced from ensuring quality fresh water resources. In this is 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, and we recognise that this is much less tangible to measure than some other direct or primary water uses (such as irrigation), but it exists equally in its tangible value to the New Zealand economy and the value ultimately achieved is just as real.

The importance of fresh water to the tourism industry

20. 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.
21. 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.
22. 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.

TOURISM INDUSTRY AOTEAROA

Level 4, 79 Boulcott Street, PO Box 1697, Wellington 6140, New Zealand
P +64 4 499 0104 www.tia.org.nz E info@tia.org.nz

23. 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 our international visitors 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.

The recreational value of the Ngaruroro and Clive rivers

24. The recreational value of the Ngaruroro and Clive rivers is being described in detail in Section B3 of the application. It provides detail on the outstanding angling, white water rafting, kayaking and jetboating opportunities and values.

25. These values include aspects such as wild, scenic and natural landscapes; excellent water quality; the opportunity for multi-day trips; outstanding angling; outstanding jetboating opportunities; and habitat for native birds and fish. These values are of significant importance to the tourism industry and reiterate the value of fresh water to the tourism industry and the wider economy.

26. It is important to TIA that these recreational users of the Ngaruroro and Clive rivers, including tourism operators, continue to be able to practice their activities on the rivers. Its value to tourism is both in its inherent and unique aesthetic qualities and in its potential to support concessioned tourism activities. We would strongly oppose closing off these rivers for recreational/tourism activities and would not support the application if this was decided on.

TIA's view on the application

27. TIA supports maintaining or improving national fresh water quality towards standards that support the health of our natural landscapes; that support a healthy sustainable nation; and that enables a 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.

TOURISM INDUSTRY AOTEAROA

Level 4, 79 Boulcott Street, PO Box 1697, Wellington 6140, New Zealand
P +64 4 499 0104 www.tia.org.nz E info@tia.org.nz



28. According to the Department of Conservation, Water Conservation Orders have been used successfully to protect in-stream interests and to safeguard flow regimes.¹ They are useful for all parties because they provide a clear, transparent mechanism that sets real limits, provides certainty, helps the planning process, lowers costs and makes effective use of stakeholders' time and resources.² Currently, a Water Conservation Order is the only RMA mechanism that can be used to effectively protect outstanding rivers. A Water Conservation Order for the Ngaruroro and Clive rivers would help assure the tourism industry that all essential New Zealand values and needs will be met for these two particular rivers – that there will be bottom lines to protect the mana and ecological health of our rivers, streams, lakes, aquifers and wetlands; that the New Zealand public and New Zealand's visitors 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 the water will improve.

29. The application is based on robust expert science and technical advice. The applicants have consulted with groups/organisations that have an interest in these rivers. Views and feedback from these parties were considered and incorporated into the application where possible. We strongly support this application and we are of the opinion that appointing a Water Conservation Order for these rivers would improve the way these rivers are managed.

Tikanga Maori

30. TIA is pleased to see the recognition of tikanga Maori and the cultural and spiritual purposes in the application. We support the statement by Ngati Kahungunu that *'Our natural environment provides our physical sustenance as well as being a reminder of tipuna and the spiritual aspect of our existence. The health of our environment has a direct influence on the health of our people. We are charged to preserve and protect our air, water and lands and the resources within for the benefit and survival of our mokupuna'*.

¹ Department of Conservation, *Protecting New Zealand's rivers*, 2011 – as sourced from <http://www.doc.govt.nz/about-us/statutory-and-advisory-bodies/nz-conservation-authority/publications/protecting-new-zealands-rivers/>

² *ibid*

Follow-up process

31. 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. If others make a similar submission, TIA would consider presenting a joint case with them at a hearing.

BACKGROUND

32. 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.

33. 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.

TOURISM INDUSTRY AOTEAROA

Level 4, 79 Boulcott Street, PO Box 1697, Wellington 6140, New Zealand
P +64 4 499 0104 www.tia.org.nz E info@tia.org.nz

