

New Zealand Recreation Association

Submission on: 'Clean Water 2017' Consultation document

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Submission from:

Sam Newton

Advocacy Manager – Outdoor Recreation

New Zealand Recreation Association

PO Box 11132,

Manners Street,

Wellington 6142

Cell: 027 723 9380

Email: sam@nzrecreation.org.nz

Introduction

1. The New Zealand Recreation (NZRA) is a registered charity and the organisation responsible for providing leadership, advocacy and professional development opportunities for those involved in the broader recreation sector. Its role is to champion high quality recreation for the benefit of New Zealand.
2. The New Zealand Recreation Association's membership includes recreation policy makers, territorial local authorities, voluntary organisations, regional sports trusts, outdoor recreation businesses, and others involved in the delivery of recreation in New Zealand.
3. The importance of recreation to New Zealand cannot be understated. Recreation is part of what it is to be a New Zealander. Many of us are members of clubs and groups that enjoy recreation for fun, health and social reasons.
4. For individuals, recreation contributes to physical and mental wellbeing and provides an opportunity to meet new people. People define themselves and their communities through their recreation opportunities. Recreation fosters community cohesion and resilience, and supports the integration of diverse ethnic and other social groups.
5. Investment in recreation generates tourism opportunities and supports regional development by encouraging skilled professionals and migrants to consider business options in and beyond the main centres, and in areas which offer quality lifestyle and family options.

6. The market value of recreation and sport is estimated by Sport New Zealand to be at \$5.2 billion, or nearly 3 per cent of GDP. The nation's recreation values and opportunities are fundamental to the nation's tourism industry. Approximately 50% of international visitors to New Zealand participate in one form of outdoor recreation or another.
7. Greater understanding of these benefits and their downstream impacts, along with awareness of how laws and regulations can influence recreation delivery, are key to ensuring that New Zealand's recreation opportunities remain among the world's best.

Value of Recreation in New Zealand's freshwater areas

8. Recent research indicates that recreating on New Zealand's freshwater rivers and lakes is a highly popular activity.
9. Fishing is the 5th most popular form of Active Recreation for New Zealanders, with 19.5% of the population participating in that activity at least once every 12 months. Canoeing/kayaking (8.1%) has participation levels in a similar realm to Football (6.3%), Tennis (6.3%), Netball (5.7%) and Cricket (5.3%); notably more than Hunting (5%) and Rugby, which did not feature in the top 20 activities [[Sport New Zealand – Active New Zealand Survey 2013/14](#)]. Many of these fishers and kayakers may be recreating on saltwater but there are nevertheless many who actively use and value New Zealand's freshwater and only highlights the need to clean up our water ways.
10. Swimming is the second most popular form of Activity for New Zealanders with 30.2% of the population. The fact that many rivers and lakes are no longer considered swimmable by the authorities and the public alike only reinforces the dire need to improve water quality in New Zealand. We consider a 'wadeable' standard of water quality is unsatisfactory, and in most cases unacceptable.
11. There are massive health benefits that arise from recreation, and there is a growing body of research showing a strong correlation between recreation and not only physical, but also mental wellbeing. Contact with nature through outdoor recreation, for example, is being shown to reduce stress and lessen the impact of mental health conditions. This is supported by studies including The Department of Conservation's excellent summary study [Health and wellbeing benefits of conservation in New Zealand](#), which concluded that (amongst other things) "Green spaces seem to influence health and wellbeing in three main ways: by providing opportunities to partake in physical activity; by facilitating the development of social capital; and through direct restorative effects, including recovery from stress and 'mental recharging'" (p.27).
12. [The Costs of Inactivity](#), a 2010 study into the economic impact of inactivity, estimated that 246 premature deaths per year could be attributed to a lack of physical activity. It also estimated the cost of inactivity to the economy at \$1.3 billion per year, of which \$614 million was direct (consisting of actual health expenditure and health promotion costs) and

the remainder was indirect, including monetary values for loss of productivity, pain and suffering.

13. Given its significant contribution to society in terms of our economy and our general quality of life, NZRA strongly opposes any policy or regulation that impinges upon recreational usage of freshwater. Thusly, recreation should be given much greater prominence in the Government's freshwater reform programme.

14. NZRA supports the majority of the “Key Values for Natural Waterways” as espoused by the New Zealand Federation of Freshwater Anglers, namely:

1. *Water is a public common, belonging to all New Zealanders and owned by none, regardless of where it is found.*
2. *Freshwater supports ecosystems whose protection takes precedence over the commercial exploitation of such freshwater, or surrounding land use.*
3. *The use of public water for private wealth generation is a privilege, not a right.*
4. *The privilege of using freshwater and the surrounding land for private wealth generation contains a universal requirement to prevent or mitigate any deterioration in the quantity or quality of water returned actively or passively into water bodies and aquifers.*
5. *The use of freshwater for private wealth generation shall include the cost of monitoring, mitigating and remedying compliance with Key Values and National Standards, for each individual usage.*
6. *National Standards are required for any parameters necessary to achieve (2) above.*
7. *Any National Standard for any parameter required for (6) above must be set by Central Government.*
8. *The governance of freshwater bodies and aquifers in accordance to these values and standards is a Regional Authority responsibility.*
9. *There needs to be a mechanism whereby Regional Authorities are held accountable for the achievement of Key Values and National Standards for freshwater, and penalised for non-achievement.*

Freshwater and our environment

15. NZRA supports the broad intent and regard for freshwater as described in the Ministers message on pages four and five of the Consultation document. But has several concerns with other aspects of the consultation document.

16. NZRA is pleased to note that its suggestion that a ‘wadeable’ standard has been replaced by a ‘swimmable’ standard, as per our submission to ‘Freshwater: Next Steps’ in 2016.

17. NZRA submits that the definition of what constitutes a swimmable river or lake is too narrow and does not include smaller waterways where people often recreate
18. NZRA supports macro-invertebrate monitoring as a means of assessing ecosystem health and managing water bodies for recreation. However, we submit that *e.coli* levels are a narrow measure of freshwater health. It is conceivable that a waterway could have disagreeable levels of nutrients, nitrates or algal growth and still be defined as swimmable.

Excluding livestock from water bodies

19. NZRA broadly agrees with the exclusion of stock from waterways by way of fencing, but submits that the proposed regulations do not go far enough.
20. Fencing will only mitigate, but not prevent the over-nitrification of waterways. It doesn't prevent phosphorus and pathogen runoff, or runoff from stock effluent.
21. NZRA submits that the proposed deadlines, stock types and farm type outlined on Page 26, are unambitious and need to be revised:
22. NZRA is pleased to note that Dairy Support land owned by the farmer is not deemed significantly different enough from third party grazing to justify a separate timeline, as per our submission to *Freshwater: Next Steps*.
23. However, NZRA is disappointed to note that the timeline for land used for dairy support has been extended even further than as described in *Freshwater: Next Steps*. The dairy support deadline of 2022 is incredibly unambitious. Farmers utilising land for dairy support were equally capable of fencing off waterways by 1 July 2017. At the very least, the timeline should be restored to 1 July 2020, as per *Freshwater: Next Steps*.
24. The deadline of 2030 for Lowland/rolling hills is equally unambitious. Slopes of 3-15 degrees are perfectly capable of being fenced off in a much shorter timeframe. NZRA submits that the deadline for undulating/rolling hills should be 2025.
25. NZRA submits that allowing a farmer to be granted an exemption from stock exclusion by the local regional council upon the submission of a 'stock exclusion plan', presents significant risks to the integrity and efficacy of stock exclusion requirements.

Iwi rights and interests in freshwater

26. NZRA submits that proposals supporting and advancing iwi interests in freshwater are admirable. The values and interest of recreationalists as they pertain to Freshwater are closely aligned with those of Maori, as embodied in the concept of *Kaitiakitanga*.
27. In addition to consultation with Iwi, NZRA submits that regional councils should also be required to consult with key recreational user groups, in the formulation of their policies and plans relating to freshwater. It is often that case that regional councils have been at great pains to consult with the direct economic beneficiaries of freshwater exploitation, with scant regard to the millions of New Zealanders that use our freshwater resource recreationally.

Freshwater funding

28. NZRA submits that the minimum application amount of \$200,000 and the requirement for 50% of the funds to be sought elsewhere, imply a scale that would exclude most recreational user groups interested in contributing to restoration projects.

National Policy Statement for Freshwater Management

29. NZRA notes with concern the lack of a specific reference to recreational access to freshwater. This is in stark contrast to the New Zealand Coastal Policy Statement 2010, which makes excellent reference and provision for recreational access to coastal waters (Policy 19).
30. NZRA submits that an amendment be made National Policy Statement for Freshwater Management by incorporating a policy similar to Policy 19 of the New Zealand Coastal Policy Statement 2010. Such an amendment would ensure that public access is acknowledged as a matter of national importance, as it is in the Coastal Policy Statement.
31. NZRA supports the inclusion and revision of 'Human Health for Recreation' as a compulsory value in the proposed National Policy Statement for Freshwater Management.
32. NZRA does not support the proposed amendment to Water Quantity Objective B1 of the National Policy Statement. The inclusion of the additional phrase "while providing for economic well-being, including productive opportunities" dilutes the clarity of the existing objective and opens the objective to interpretation.

Conclusions

33. While there are some laudable intentions included in the consultation document, NZRA considers there has not been enough consideration given to recreational use.
34. It is pleasing to see a return to a 'swimmable' standard, as opposed to previously proposed 'wadable' standard.
35. It is pleasing to see a national standard of recreational usability applied to the management of freshwater.
36. Exclusion of stock from waterways must be expedited to ensure further damage is prevented. This is a matter that has been known for some time and requires urgent attention.
37. We submit that additional steps must be taken to tackle the issue of surface runoff, ensuring nitrates, stock effluent and other pathogens are excluded from waterways.
38. As key users of waterways, we request recreation groups be consulted in the formulation of plans and policies regarding our waterways.
39. NZRA would be happy to work with the Government in establishing further contact with, and recognition of, recreational users of New Zealand's lakes and rivers.