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## Action for healthy waterways

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**Submission:**

**Introduction**

1. The New Zealand Recreation Association t/a Recreation Aotearoa is the professional association responsible for providing leadership, advocacy and professional development opportunities for those involved in the broader recreation sector. We work at an agency, industry and professional level to build capability, develop partnerships and equip individuals and organisations with the skills they need to deliver high quality recreation experiences that engage participants.
2. Recreation Aotearoa'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 throughout New Zealand.
3. Our role is to champion high-quality recreation for the benefit of New Zealand.
4. Our vision is that by 2020 New Zealand will have a strong recreation industry that meets the needs of current and future participants, so that through recreation, New Zealanders are active, healthy and connected.
5. Recreation Aotearoa believes recreation is vital to New Zealand society. Recreation is not just about enjoyment, it is about being healthy, engaged, stimulated and connected with others. This occurs via outdoor recreation, community recreation, parks and aquatic facility-based recreation centres.
6. Recreation is a major contributor to the physical and mental health of individuals and to the resilience of our communities. 90% of New Zealanders believe that by being active they are maintaining a good level of health and fitness. *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), including monetary values for loss of productivity, pain and suffering.
7. Contact with nature through outdoor recreation has been shown to reduce stress and lessen the impact of mental health conditions. The Department of Conservation's excellent summary study, *Health and wellbeing benefits of conservation in New Zealand*, concluded that access to outdoor recreation opportunities ".....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".
8. A thriving recreation industry can also help our nation prosper socially and economically. Sport and active recreation contributes \$4.9 billion (2.3%) to our annual GDP, and the sector employs more than 53,000 New Zealanders. The nation's recreation values and opportunities are fundamental to its tourism industry. Approximately 50% of international visitors to New Zealand participate in one form or another of outdoor recreation.

9. 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. 84% of New Zealanders believe sport and physical activity bring people together and create a sense of belonging.
10. New Zealanders define themselves and their communities through their recreation opportunities. Recreation fosters community cohesion and resilience and supports the integration of social groups, such as diverse ethnic groups. 74% of New Zealanders agree that sport and physical activity help build vibrant and stimulating communities.
11. Investment in recreation generates tourism opportunities and supports regional development by encouraging skilled professionals and migrants to consider career and business opportunities beyond the main centres.
12. Research shows that recreation makes a significant contribution to social resilience. It allows individuals to thrive and connect with each other; this makes communities stronger. A society in which people are active and healthy is also more economically sound.
13. 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.

#### **Recreation in New Zealand's freshwater areas**

14. Recent research indicates that recreating on New Zealand's freshwater rivers and lakes is a highly popular activity.
15. Swimming is one of the most popular forms of physical activity for New Zealanders with 35% of the population swimming at least once a year. 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.
16. Freshwater fishing is a very popular form of active recreation for New Zealanders, with 6% of the population participating at least once every 12 months. Canoeing/kayaking (12%) has participation far greater than our most popular sport including football (7%), tennis (7%), netball (5%) and cricket (4%) [Sport New Zealand – Active New Zealand Survey 2018].
17. Given its significant contribution to society in terms of economy and general quality of life, Recreation Aotearoa strongly opposes any policy or regulation setting that impinges upon or detracts from recreational usage of freshwater. Thus, recreation should be given much greater prominence in the Government's freshwater reform programme.

## Healthy Water, Healthy Future – joint statement

18. Recreation Aotearoa is a signatory to the Healthy Water, Healthy Future joint statement of October 2019. Fellow signatories included The Public Health Association, Forest & Bird, Fish & Game New Zealand, Environmental Defence Society, Greenpeace, Water New Zealand, Whitewater NZ, and Choose Clean Water.

19. In signing the joint statement, the signatories agreed that:

*“Irresponsible leadership has allowed serious and ongoing pollution of Aotearoa New Zealand’s fresh water. Water pollution increases risks to people’s drinking water, profoundly impacts cultural wellbeing, limits recreational opportunities, damages the health of our plants and wildlife, and undermines the sustainability of our industries.*

*Weak freshwater policy would exempt some sectors from responsibility, lock in high polluting operations, and make it harder to protect and restore the health of the country’s fresh water.*

*Responsible leadership and effective freshwater policy, with Te Mana o Te Wai as its framework, will put Aotearoa New Zealand on the right path to healthy water, healthy land use and infrastructure, and healthy communities.”*

20. The joint statement goes on to describe four fundamental policies, namely:

### **21. Adopt all science-led bottom lines on water pollution.**

We support the recommendations from the Science and Technical Advisory Group on all pollution standards and bottom lines for ecosystem health. We especially support the addition of the following new measures for the health of our waterways: dissolved inorganic nitrogen (DIN) with a bottom line of 1mg/L, sediment, and a wetland extent and wetland condition index. We also support improving standards for swimming and including bottom lines for swimming standards.

### **22. Do not protect high polluting operations.**

We do not support basing rules for future activities on current levels of pollution as this would lock in current destructive practices and reward the highest polluters. We support a prohibition on conversions to highly polluting land uses like dairy, and restricting high-polluting activities such as intensive winter grazing until councils have a plan on how to fairly manage pollution within environmental limits. We support bringing the highest polluters down to reasonable levels immediately through rules that target high-polluting activities.

### **23. Prioritise effective rules over farm plans.**

We support a clear and explicit rules-based system for managing high-polluting activities. We do not support replacing effective rules with farm plans. This will lead to farm plans becoming a “tick box” exercise for compliance. They would fail to be used to their greatest

potential to drive real environmental change. Farm plans can be useful tool to support decision-making for farmers and land managers. However, clear and effective rules must be prioritised as the best way to achieve the Government's stated goal of measurable improvements within five years.

#### **24. Ensure everyone plays their part in restoring the health of our fresh water.**

We agree all sectors, regions and communities must play their part in protecting and restoring the health of our waterways. We do not support an exemption for the six largest hydro-schemes and maintain that these schemes can responsibly contribute to meeting the goals of the freshwater policy. We assert that future policies on forestry, drinking water, wastewater and storm water activities must be consistent with the proposed new freshwater reforms.

### **Comments on the National Policy Statement for Freshwater Management**

25. Recreation Aotearoa submits that Recreation/Wai tākaro should have been reinstated in Appendix 1: National Values and uses for freshwater, of the National Policy Statement for Freshwater Management (NPSFM). Recreation Aotearoa was satisfied that recreation was included as a National Value in the 2011 discussion document but was disappointed that it was removed from the final NPSFM 2014, and that the health benefits of recreation in freshwater was passed over in favour of health risks. Millions of New Zealanders enjoy and benefit from the recreational opportunities that freshwater lakes and rivers provide. The recreational value of freshwater should be held in the highest regard.
26. Recreation Aotearoa has a long-held view that the NPSFM lacks a specific reference to recreational access to freshwater. This is in stark contrast to the New Zealand Coastal Policy Statement which makes excellent reference and provision for recreational access to coastal waters (Policy 19).
27. Recreation Aotearoa submits that an amendment be made to the National Policy Statement for Freshwater Management by incorporating a policy similar to Policy 19 of the New Zealand Coastal Policy Statement. Such an amendment would ensure that public access is acknowledged as a matter of national importance, as it is in the Coastal Policy Statement.
28. Recreation Aotearoa is disappointed to note that the draft NPSFM does not contain a policy or objective that sets a goal of achieving a healthy ecosystem. The objective seeks to 'prioritise' the health of ecosystems, which is not strong enough. This is a contrast to the current NPSFM which clearly sets this goal. Similarly, there is no objective or policy that specifically requires freshwater quality to be maintained as it does in the current NPSFM.
29. Recreation Aotearoa is supportive of Policy 4 but submits that a greater degree of clarity could be achieved as to how the NPSFM integrates with the New Zealand Coastal Policy Statement. It is desirable that local territorial authorities manage freshwater resources in a way that achieves the objectives of the NZCPS for inlets, estuaries and harbours.

## Feedback in detail

30. Recreation Aotearoa submits its support of Te Mana o te Wai (Section 4.2, Page 28). It is our view that recognition of the health of the river, in a holistic sense, is a useful lens by which to view competing interests in the management of freshwater resources.
31. Recreation Aotearoa submits its support of Strengthening Māori values (Section 4.3, Page 30) in the management of Freshwater. The values and interest of recreational users of freshwater are closely aligned with those of Māori, as embodied in the concept of Kaitiakitanga.
32. In principle, Recreation Aotearoa is supportive of more integrated management of freshwater (Section 4.5, Page 34) as the intention to improve clarity and reinforce a holistic approach to freshwater management is desirable. However, we submit that the requirement to “recognise” interactions might not achieve a desirable outcome for recreational users of freshwater, in the absence of a requirement to remedy or accommodate those interactions.
33. Additionally, Recreation Aotearoa is supportive of the requirement that local territorial authorities, with shared jurisdiction over a catchment, should co-operate in the integrated management of the effects on freshwater of land use and development. However, this section lacks sufficient detail to cope with complicated tensions that will inevitably emerge when a ‘downstream council’ set outcomes that an ‘upstream council’ will need to operationalise.
34. Recreation Aotearoa does not support exceptions for major hydro schemes (Section 4.6, Page 34). While we value renewable energy generation, we do not believe that hydroelectric electricity generation cannot be carried out without maintaining high freshwater quality. Hydroelectric electricity generation is undertaken on New Zealand’s largest rivers (Waikato, Waitaki, Clutha) and are used for recreational purposes by Millions of New Zealanders. To exempt them would be deeply undesirable.
35. In principle, Recreation Aotearoa is supportive of new indicators of ecosystem health to be monitored and then maintained or improved. It has been our long-held view that macro-invertebrate monitoring is a laudable means of assessing ecosystem health and managing water bodies for recreation. However, we have also expressed the view that E.coli levels are a narrow measure of freshwater health. Narrow measures could allow for disagreeable levels of nutrients, nitrates or algal growth to exist in waterways and still be defined as swimmable.
36. As such, we support the inclusion of a broader range of attributes that cover more components of freshwater health. However, we consider timeframes for achieving target attribute states ‘may be of any length or period’ is inadequate to achieve the Ministers stated goal of restoring water quality in a generation.

37. In principle, Recreation Aotearoa supports efforts to provide for fish passage (Section 5.5, Page 43), recognising that Freshwater fishing is a recreational activity undertaken by 6% of New Zealanders each year. However, we recognise the occasional tension between allowing for the passage of introduced species (such as Salmon and Trout) and protecting indigenous freshwater species. Sew submit that there is greater clarity required as to what are considered 'undesirable' fish species. Utilising the term 'pest species' as it is enshrined in the Biosecurity Act would provide clarity and distinction from introduced species.
38. Recreation Aotearoa support the goal of no further loss of streams (Section 5.7, Page 45). Where a stream is retained and/or protected for the sake of providing a habitat for species, it is a possibility that the stream could be safe and appropriate for recreational use. In that sense, the interests of conservation and recreation are aligned, which is typical.
39. Recreation Aotearoa supports new bottom lines for nutrient pollution (Section 5.8, Page 45). Recreation Aotearoa is deeply concerned about how nitrogen is currently considered and managed in freshwater bodies in New Zealand. While there have been laudable advances in fencing off waterways from stock, fencing will only mitigate but not prevent the over-nitrification of waterways. It doesn't prevent phosphorus and pathogen run-off, or run-off from stock effluent. Recreation Aotearoa submits that there is scope to strengthen the monitoring, reporting and remediation requirements relating to nitrogen run-off.
40. Recreation Aotearoa supports reducing sediment to improve water quality (Section 5.9, Page 48). Silty, discoloured waterways are unappealing for recreational use and diminish the quantity and quality of recreational opportunities. We support the requirement of local territorial authorities to manage suspended sediment and sediment deposits.
41. Recreation Aotearoa supports a higher standard of water quality for swimming (Section 5.10, Page 50). However, there are aspects to this proposal that require strengthening. The current wording does not set a clear obligation on councils to make rivers safe for swimming. Combined with the lack of bottom line for swimming quality makes for a very weak prescription and is arguably less aspirational than the current NPSFM.
42. The requirement to only make rivers swimmable in the summer months is inadequate and does not reflect patterns and trends in recreational use of freshwater. Recreation Aotearoa strongly opposes this time-bound approach.
43. Recreation Aotearoa submits that E.coli levels are a narrow measure of freshwater swimmability. It is possible that a waterway could have levels of nutrients, nitrates or algal growth that make swimming extremely unpleasant and still be defined as swimmable.
44. Higher standards of water quality for swimming is dependent on monitoring and reporting by local territorial authorities. This could be strengthened. A site-focused framework appears to be inconsistent with the whole of river approach of the national target, which is improving total length of rivers that are suitable for swimming. Monitoring and sampling requirements should be clearly stipulated in detail, if not in the NPSFM, then in the NES. It is also unacceptable that local territorial authorities are not required to do anything more than monitor and notify. When breaches occur, it must be explicit that they take action to restore

swimmability. For that reason, clear and comprehensive standards must be circulated and an unequivocal obligation on local territorial authorities to achieve those standards must be enforced.

45. Recreation Aotearoa supports improved regulation around freshwater quantity (Sections 5.11 and 5.12, Page 51). We welcome improvements to setting minimum flows and real-time reporting of water use; when and where it improves recreational opportunities on and in bodies of freshwater.
46. Recreation Aotearoa supports Improving farm practices through farm planning (Section 8.3, Page 65). We recognise the extent to which different farms in different regions require a bespoke approach to managing their impacts on Freshwater quality. We commend the instances where farm plans and improved farming practices have resulted in better freshwater recreation outcomes. We support a universal nationwide requirement for farm environment plans to manage their risk to water quality pollution.
47. Recreation Aotearoa supports immediate action to reduce nitrogen loss. While there have been laudable advances in fencing off waterways from stock, fencing will only mitigate, but not prevent the over-nitrification of waterways. It doesn't prevent phosphorus and pathogen run-off, or run-off from stock effluent. Action to reduce nitrogen leeching, both immediate and long-term, will likely incentivise riparian planting. Riparian plantings are highly successful, and we support them in principle, but we must be vigilant to the risk that in some cases, in combination with fencing, they impede recreational access to freshwater.
48. Recreation Aotearoa supports the exclusion of stock from waterways (Section 8.5, Page 73) and has previously called for more stringent requirements to be implemented sooner. We applaud the agricultural sector for making significant advances in this realm. However, we submit that fencing will only mitigate, but not prevent the over-nitrification of waterways. It doesn't prevent phosphorus and pathogen run-off, or run-off from stock effluent.
49. Recreation Aotearoa wishes to draw attention to the issue of recreational access to freshwater, when considering setbacks, fencing and riparian planting. Depending on how these mitigations are used in combination, on a case-by-case basis, recreational access can be either enhanced or reduced. We submit that farm environmental plans should include the consideration of recreational access to freshwater.
50. Recreation Aotearoa supports the control of intensive winter grazing, restricting feedlots and reducing pollution from stock holding areas (Sections 8.6, 8.7 and 8.8) to the extent to which they improve freshwater quality for recreational use. The laudable improvement made by many in the agricultural sector should be congratulated. However, it is clear that cumulative downstream impacts of intensive agriculture on freshwater quality have reduced the quality and quantity of recreational opportunities in and on freshwater.