Submission on Action for healthy waterways
The New Zealand Professional Fishing Guide Association (NZPFGA)

Submitter on behalf of the NZPFGA
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Introduction

The New Zealand Professional Fishing Guides Association (NZPFGA) is one of the largest industry associations focused on outdoor recreation in New Zealand. NZPFGA members have not only a deep connection with the rivers, lakes and streams that make up New Zealand's fresh water, but also rely on it to make a living.

Our members have watched over the last few decades as some very special places have changed forever, as the waterways that bisect them and feed life into them, have been degraded or even disappeared.

The importance of tourism to NZ is obvious and has been one of our shining lights. Our tourism industry has been the envy of the world – selling our “Clean Green” image. This is being destroyed as our rivers are being polluted and dry up due to over irrigation. Our feelings of sadness, frustration pale when you consider the wider ramifications of what is happening before our eyes.

Fly fishing tourism is wider than just the anglers who come to NZ, hire a car, books a hotel and fish with a guide. They bring families, who in turn pour significant overseas revenue into our economy. Our overseas guests are typically high spending, low impact tourists.

Speaking as a very concerned collective, the NZPFGA urges you to listen to our plea’s and pay serious note of the many overseas examples of just how precious our life-giving resource that rivers are.

Members in various parts of the country, feel that waterways have been adversely affected by intensive farming, over irrigation, forestry, land clearing and habitat modification.

The feedback we get is alarming to say the least. It shows the most affected are our lowland streams where people swim, anglers’ fish, and families picnic at the water’s edge.
The loss of many many of our precious lowland rivers has put increasing pressure on our more remote backcountry fisheries that are simply world class and these are showing significant signs of that added pressure.

Additionally, of serious concern, is the fact that migrating salmon, trout, and native fish species need access to the sea and good flow regime’s, and the more degraded our lowlands waterways are, the more impact on our precious backcountry waters.

It is also very important to note that we want to make a very clear distinction that the NZPFGA does not blame farmers, as a group, for some issues we are facing at present. Regional councils should also bear responsibility as are responsible for setting the rules surrounding water quality & irrigation.

NZPFGA supports the bill in its desire to improve and maintain clean water ways. The fencing off of water ways over a meter in width and planting trees is a good way forward but our organisation has witnessed how farmers have been doing this for some time and we encourage central Government to be more flexible in some of their rules.

To put all farmers in the one category is fundamentally floored; one only needs to look at the difference between an intensive dairy farm versus a sheep and beef farm to see why they should not be put in the same category.

**Proposals as a whole**

1. NZPFGA thinks the proposals set out in this document will stop further degradation of New Zealand’s freshwater resources, with water quality materially improving within five years.

2. NZPFGA has the view that without any immediate action the proposals will not bring New Zealand’s freshwater resources, waterways and ecosystems to a healthy state within a generation. Considering the lengthy process of such a proposal to be implemented we cannot see how rapid action can be taken.

3. NZPFGA believes that the proposal will make maximum difference but reversing the existing situation will require more than the current proposals.

**Impacts and implementation**

4. NZPFGA is part of the tourism industry and as such feels that the entire tourism industry has not be part of consultation. NZPFGA has always advocated for better waterways and has historically put measures in place with our members. The essential action for NZPFGA is to maintain communication, co operation and consideration with the landowners, farmers, but also the wider local communities. Working together towards a better future.

5. NZPFGA wishes to enter a closer relationship with central government in terms of being part of the consultation process. We believe we can add considerable value to the process as our members are on the river day after day and see first hand the good, the bad and the downright ugly.

6. NZPFGA is concerned that there is a potential risk of seeing good practising farmers being penalised, loosing land and revenue, closing their farm gates. Additionally, there is significant risk of the wide spread development of invasive weeds such as broom, gorse, old mans beard & blackberry alongside fenced of properties on rivers banks.
Water commission

7. NZPFGA agrees that all stakeholders should be integrated to an independent national body, to provide oversight of freshwater management implementation, as recommended by KWM and FLG is paramount to avoid mistakes to be repeated.

8. NZPFGA was surprised that there was no consultation with the Association, as we are one of the main stakeholders, a major contributor to the tourism industry and one of the best guardians on the ground of the waterways.

Te Mana o te Wai

9. NZPFGA supports in principle the Te Man o te Wai hierarchy of obligations. The first two priorities are closely intricate and should be considered at equal level.

10. NZPFGA believes that the proposal will have the desired effect but believes that the public's health needs to be kept as the first target.

11. NZPFGA believes that regional councils should not have the latitude to manage the freshwater in a way that is not consistent with Te Mana o te Wai

12. NZPFGA has the view that, although this is a great step forward, a long term vision on such important issues is not sufficient and will not enough contribute to upholding Te Mana o te Wai as it is subject to interpretation.

New planning process for freshwater and redrafted National Policy Statement

13. It is NZPFGA view that despite of the importance of the process consultation of all stakeholders remains a priority.

New Māori value and new threatened species values

14. In regards to the four questions regarding New Māori value and new threatened species values NZPFGA has the view that incorporation of Māori values are important as long as they does not derail the process by lengthy debates. Working hand in hand with Iwi.

Exceptions for major hydropower schemes

15. NZPFGA does not believe that the six largest hydro electricity schemes should be exempted by the process.

Nitrogen, phosphorus, and sediment attributes

16. NZPFGA is a tourism-based association working closely with scientific experts. The questions regarding the topics as above, can only be based on scientific evidence and as such NZPFGA will have no further comments.

Ecosystem health policies

Fish passage

17. NZPFGA accepts the fact that Fish passages are essential, however the most important factor is the presence of sufficient water flow and the correct water levels. These are paramount to allow fish migration.
18. Fish passages should apply to all instream structures that are barriers to fish passage. Modifications and consents should be provided without any delay. The consents process should be allocated as soon as possible, with administrative hurdles to be reduced to a minimum.

19. Wetlands protection is paramount as it is source of life for many aquatic species.

20. NZPFGA does not agree with the notion of "offsetting" a component as it does not solve the problem, all it does is shift the problem to be a different part of waterway.

**Ecosystem health attributes**

21. NZPFGA view is that only science-based evidence should be considered.

22. NZPFGA agrees that there is a need to have attributes for nutrients based on a relationship with aquatic life.

**Swimming**

23. NZPFGA has the view that improving water quality to a swimming standard should be the national norm. Access to safe swimming rivers is key to the engagement of local communities.

**Flows and metering**

24. NZPFGA would support a national and regional monitoring of ecological flows and levels. We believe that some of the existing minimal flows are set far too low for an ecologically health river. Drastic minimal levels have too often impacted on aquatic life.

**Drinking Water National Environmental Standards**

25. NZPFGA has the view that the Drinking Water NES amendments are important and that regional councils should take all measures to protect sources of drinkable water.

**Stormwater and wastewater**

26. NZPFGA believes the proposed Wastewater NES address all the matters that are important when consenting discharges from wastewater networks. It agrees it will lead to better environmental performance, improve and standardise practices, and provide greater certainty when consenting and investing.

27. NZPFGA does agree with the scope of the proposed risk management plans for wastewater and stormwater operator.

**Farm plans**

28. NZPFGA has the view that a vast majority of farmers are responsible operators and therefore would support voluntary farm plans rather than mandatory. To put all farmers in the one category is fundamentally floored; one only needs to look at the difference between an intensive dairy farm versus a sheep and beef farm to see they should not be put in the same category.
Excluding stock from waterways

29. NZPFGA believes that a 5m setback would potentially present an economical and financial risk to farmers. There would be a loss of land, revenue and ecologically, will certainly create new problems such as rapid growth of gorse, broom, blackberry, wilding pines. It will also create new barriers for the public and water users as those new fences will be electrified, barb wired.

A better approach would be to implement a plan on when fences need to be replaced, then they should be set back further from the river. The NZPFGA would support a fund set up by govt (in this instance the Provincial Growth Fund) to assist farmers with fencing in cases that it seems unreasonable on the farmer, but still has to be done.

30. Those exemptions to the stock exclusion regulations already exist and are generally found where Landcorp is managing the land either for itself or on behalf of DOC. The Molesworth station is one example.

Controlling intensive winter grazing

31. NZPFGA understands that winter grazing is a difficult time for farmers. However, we support more stringent rules surrounding intensive break feeding of cattle & deer on brassicas.

Policy interactions

32. The entire discussion document fails to recognise the essential nature of tourism and fresh water interaction. The tourism industry relies on fresh water as part of the destination that is New Zealand.

NZPFGA is concerned that the proposal will increase tension and might see our industry being put at risk of being unable to access the water which is paramount for our survival. It fails to recognise that the guided fishing industry contributes largely to the economy of the country.

Economic value of guiding industry

33. The average guiding fee is estimated to be $750 per guided angler per day, and the average number of “guiding days” per guide is estimated to be 75–100 days per year (NZPFGA data). Based on this, annual turnover for the identified guides now operating may be in the order of $35–$45 million per year, which gives some idea of the current size of the industry.

The NZPFGA is the largest single activity industry association in New Zealand’s outdoor recreation sector and the restrictions from the proposal could well see a huge drop in revenue for our members.

Forestry

34. The NZPFGA believes more control is needed in the forestry industry. Its our view that to allow forestry to harvest right down to the river allows an enormous amount of sediment to enter our rivers. This in turn suffocates insect life drastically reducing the biodiversity of our rivers. It is our understanding that New Zealand is one of the few counties in the world that allows this practice to continue.