SAANZ and the New Zealand Ski Industry

SAANZ represents the 22 ski areas that operate in New Zealand, comprising both commercial and club areas. SAANZ works to promote the industry, develop industry guidelines and practices and resolve collective issues facing its members.

The New Zealand ski industry provides an important recreational experience for domestic and international visitors, with over 1.9 million skier visits per year (2018). Visiting a ski area is the most common way many New Zealanders visit and recreate in the alpine environment.

The industry directly employs over 200 full time and 3000 seasonal staff, with many additional indirect jobs in the tourism sector. Direct revenue is estimated at $200 million, with over 30% of that from overseas visitors. Overall the industry is estimated to be worth in excess of $1.2 billion to the New Zealand economy.

Skiing/Snowboarding is a vital sector to ensuring a strong winter season for the tourism industry. In the three years up to 2017, over 110,000 international visitors skied while they were in New Zealand. The tourism boost was particularly evident over winter, with 30% of visitors skiing. The figure was even higher for visitors to the South Island, with 64% of winter visitors skiing during their visit.

In addition to these winter activities, some ski areas are now offering summer activities such as mountain biking, mountain carting and hiking experiences. This broadens the use of existing assets and provides further easily accessible opportunities for New Zealanders and overseas visitors to interact with the alpine environment.

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1 New Zealand Tourism, Special Interest Infographic, data for the 3 years up to 2017
2 Purpose of the submission

To cope with increasing skier numbers, changing trends and safety standards in the ski industry and adapt to pressures from climate change, New Zealand ski areas are continually developing and upgrading their infrastructure. As a result, ski areas regularly undertake construction works in the alpine environment. The industry recognises the high value of the environment they operate in and are aware of the need to protect the environment during construction and operational activities.

Whilst the ski areas that SAANZ represent exist across New Zealand, some physical similarities exist due to their common alpine setting. Principally, and of relevance to this process, is the presence of wetlands and watercourses within ski areas and the need for water to supply snowmaking and potable water supply.

As ski areas are located in mountain basins with winter coverage of snow, during the spring melt, runoff occurs down gullies and channels. Water also accumulates in low spots and localised depressions in the terrain. This spring snowmelt combined with the current definitions of river and wetlands, means most ski areas have numerous ephemeral wetlands and waterways across their sites. Many of these features are very small in scale and only exist for short periods during the spring melt.

As written, the proposed Freshwater NES and NPS-FM will place significant constraints on ski area operation and development. SAANZ feels that due to the particular nature of the environment ski areas operate in, they have been inadvertently caught up in legislation which seeks to control issues which are not significant in their setting or for their scale of operations.

SAANZ seeks that the proposals be amended to account for the specifics of their environment and the scale of their operations and related effects.

3 Key submission points

SAANZ members are acutely aware of the high value of their alpine environment and see themselves as custodians of the areas they operate in. As such, they generally support the direction and outcomes sought by the Action for Healthy Waterways. SAANZ also understands that the NPS-FM and Freshwater NES was largely targeted at hill country and lowland areas, specifically with respect to managing the effects of industry and agricultural activities on water quality.

While most aspects of the NPS and NES do not impact upon ski areas, there are a few key aspects which do. Primarily the policy and rules around wetlands and watercourses. It is SAANZ’s view that the nature of the provisions combined with the prevalence of wetlands at ski areas will result in significant challenges to the operation and development of a ski area in New Zealand. It is also SAANZ’s view that these challenges are not faced by the inability to protect the values associated with the wetlands, rather the broad brush approach of the policies and rules which appear to be drafted to control much larger agricultural operations in areas where wetlands are significantly degraded or have been mostly lost.

This contrasts with alpine wetlands, which are largely untouched across New Zealand and ski area operations which are spatially small in scale, both within the sites they occupy and in terms of the total area they operate in across New Zealand. SAANZ consider that the proposed policies and provisions in the NPS-FM and the proposed Freshwater NES do not adequately take into account the
varying scale of potential effects from different activities and prevalence of different types of wetlands.

Similar concerns exist for the policies and provisions around streams.

The specific concerns relate to Habitat – no further loss of wetlands and streams, in particular:

- Part 3 of the draft NPS-FM
- Part 2 of the proposed Freshwater NES

To be consistent with your desired consultation methods, we have addressed these concerns below in the form of the questions set out in the summary document.

**Wetlands**

**Question 25.** Do you support the proposal to protect remaining wetlands?

**Draft NPS-FM**

In general, yes. However, the proposed policy and definition is extremely broad and does not account for the different scale of potential effects or the prevalence of different types of wetlands.

Large areas of many ski areas are ephemeral wetlands. This combined with the policy inclusion into regional council plans of ‘The loss or degradation of all or any part of a natural wetland is avoided’ will make it challenging to install, maintain or replace lift infrastructure, buildings and manage ski area trail networks.

SAANZ would prefer the policy to include a scale factor for the loss of alpine wetlands in ski area developments or an exception for established ski areas. This could allow small scale disturbance of a wetland (say to place a lift foundation) if the function of the wetland wasn’t significantly affected and effects could be mitigated. Note that a consenting process would be expected to govern these activities.

**Proposed Freshwater NES**

Definitions – Include a definition of recreation activities, which specifically includes infrastructure to provide for active recreation.

Definitions - Earth disturbance (all purposes) include a scale in the definition of earth disturbance. As currently defined, it covers any amount of earth disturbance, even excavation of a single spadeful. This is overly restrictive and would either lead to significant non-compliance or a massive consenting burden for ski area operators and significant processing demand for regional councils.

SAANZ support the inclusion of recreation activities in the provision under part two (specifically parts 7, 10 and 16) as this provides for their operations as a discretionary activity.

SAANZ requests that a similar inclusion for recreation activities is included in 12(3)(a) to provide for ski areas to manage drainage within 100 m of a wetland. This is needed for some construction activities and to prevent flooding and damage to infrastructure during the spring and summer months. These activities would still require consent with these inclusions, but the status would be discretionary rather than non-complying. It would also be consistent with the activity status of the other provisions.

**Question 26.** If this proposal was implemented, what would you have to do differently?
If the proposal was implemented as written, most earthworks on some ski area would become non-complying activities. This creates a burdensome consenting framework for these ski areas which is out of step with the scale and potential effects of their activities.

The proposed framework could force design changes to planned infrastructure to avoid small scale effects to wetlands which could otherwise be easily mitigated or offset. As a result, infrastructure could be less efficient, more costly and/or less financially viable.

SAANZ considers a discretionary status is more appropriate for the potential scale of effects. Consent would still be required and appropriate mitigation would be implemented with regulator oversight.

Streams

Question 27. Do you support the proposal to limit stream loss?

In general, yes. SAANZ requests that to retain consistency in activity status with the wetland rules, recreation activities are included in the list under 18(1).

Question 28. If this proposal was implemented, what would you have to do differently?

The definition of streams is very broad and would encompass many gullies and channels on ski areas which may only have water in them for very short periods in spring. The current provisions would require consents to be gained for any works that cross these gullies and channels, irrespective of the scale of the works, the value of the ‘stream’ or the potential effects.

We thank you for your consideration and look forward to reviewing the amended NPS-FM and Freshwater NES.

Signed for SAANZ

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