



Submission to Ministry for the Environment
on the
Clean Water: Consultation document (2017)

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EXECUTIVE SUMMARY

1. The Tourism Export Council New Zealand (TECNZ) welcomes the opportunity to comment on the *Clean Water: Consultation document (2017)* (the document).
2. TECNZ supports the submission of the Tourism Industry Aotearoa's (TIA). The comments we make in this submission are to compliment that submission.
 - a. 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. While 100% has never been an environmental promise, reputationally we need to be seen to be doing all that we can to protect the environment, in particular our fresh water ways.
 - b. Like TIA we are stunned to see disturbing lack of understanding of the importance of fresh water to the tourism industry and how important the tourism industry is to the economy. Being our number one export industry, the views and concerns of fresh water quality from the tourism industry should be given far higher priority and not ignored in favour of other export sectors – namely agriculture, horticulture, forestry and dairying who key polluters of our fresh water ways.
 - c. That the tourism industry is not being perceived as one of the industries that rely on fresh water quality in the economic criteria used to identify catchments for water bodies appropriate for applying for the Freshwater Improvement Fund is a gross misjudgement and needs to be immediately rectified.
 - d. Other export industries such as the dairying, beef, wine and horticulture are all heavily reliant on our clean, green image and the quality of our freshwater is especially important to continue to meet and exceed our world class food quality expectations. If we do not protect and respect our water quality, then the reputation of all New Zealand's export industries puts the economy at risk.
 - e. TECNZ believes fresh, clean water is the new 'global gold' - water creates wealth and we should value it appropriately. Until the question of water ownership and pricing are properly resolved it will be difficult to achieve efficient and effective management of our freshwater resources.

3. INTRODUCTION

The Tourism Export Council New Zealand (TECNZ) is the trade commercial organisation comprising of inbound tour operators (who package tours and itineraries) and product suppliers (tourism operators). We represent approx 1300 of the key tourism operators in New Zealand and responsible for bringing in up to 60% of all international visitor arrivals. Our focus is to build long term business relationships with distribution networks in New Zealand and offshore.

As the private trade association we sell New Zealand offshore (internationally) and buy the product onshore (here in New Zealand). Eg. Airline seats, bus and coach seats, accommodation, attractions and activities. We are in the best position to understand reputational damage to New Zealand and are usually the first tourism organisation to react to any negative international publicity.

We work closely with TIA on advocacy and policy to best represent member interests. The team is based in Wellington and is led by Chief Executive, Lesley Immink.

Any enquiries relating to this paper should in the first instance be referred to Lesley Immink, CEO lesley@tourismexportcouncil.org.nz or by phone on 027 664 4836.

4. COMMENT

Our understanding of the issue (as agreed with the TIA submission)

We understand that this consultation document has five key components:

1. A new target that 90% of New Zealand's rivers and lakes are swimmable by 2040.
2. New maps and information on the current water quality for swimming.
3. Changes to the National Policy Statement for Freshwater Management including water quality requirements for recreation, limiting nutrients and for ecological health.
4. Criteria for allocation of the \$100 million Freshwater Improvement Fund.
5. Details of new national stock exclusion regulations.

Our concern is:

- The Government does not fully understand the importance of the tourism industry to the New Zealand economy and the importance of fresh water to the New Zealand tourism industry.
- The tourism industry is not being perceived as one of the industries that rely on fresh water quality in the economic criteria used to identify vulnerable catchments for water bodies appropriate for applying for the Freshwater Improvement Fund.
- The Government did not adopt many of the (key) recommendations made by the LAWF in August 2016, and that it did this without providing good reasoning for doing so.
- The Government has not undertaken any research on the economic value of fresh water to the tourism industry nor supplied any guidance for factoring Tourism into regional freshwater planning processes.

- The Government proposes for regional councils to providing for economic well-being within environmental limits.
- There is a lack of urgency reflected in the timeframes and the risk of further decline in fresh water standards.

We support TIA's submission in relation to the above so additional comments not required. We do however provide a few other points of concern:

5. INTERNATIONAL REPUTATION

New Zealand is at great risk of international reputational damage should international media actively challenge the perception and reality of New Zealand being 100% Pure. The reality is that it is not an environmental promise but a marketing proposition. The global perception is that we are 100% Pure New Zealand and one of the most environmentally beautiful and best protected countries in the world. Word however is getting out. Our fresh water and biodiversity are under serious threat.

The following links illustrate the vulnerability we have when international media write negatively about New Zealand and our protection of the environment – or lack of.

- OECD says NZ at risk <http://www.stuff.co.nz/environment/90613205/new-zealand-showing-environmental-limits-oecd-says>
- NZ's clean green campaign at risk <http://www.dailymail.co.uk/wires/afp/article-4333518/New-Zealands-green-image-threat-OECD.html>
- NZ's dirty little secret http://www.huffingtonpost.com/entry/new-zealands-dirty-little-secret_us_58e43ea7e4b09dbd42f3dba7
- Is 1080 killing our tourism <http://www.newshub.co.nz/home/new-zealand/2017/04/is-1080-killing-our-tourism.html>

New Zealand and the tourism industry is reliant on freshwater as part of the suite of resources that make up 'Destination New Zealand'. Other attributes are environmental such as landscapes, mountains, beaches, and social such as friendly people and safety. The quality of how we manage fresh water is inherently tied to the well-being of the tourism industry in the minds of our visitors. Should their perception change, this will have a negative flow-on effect to other export sectors. Ie. If we are not doing all we can to protect fresh water, what else are we letting slide?

6. THE VALUE OF WATER TO TOURISM

The value of water to the tourism industry and economy is an under researched area and much more needs to be done.

This excerpt from the Pacific Asia Travel Association (PATA) Insights Report indicates that there is and should be involvement with the tourism sector for water legislation that supports healthy and safe communities.

- a) *Any discussion on tourism and the connected visitor economy needs to take into consideration the natural and social environment which supports our industry. It could be argued that as an industry we have a tendency to take for granted the very things that make our destinations safe and pleasant places to live and visit. This includes clean water and fresh air. These resources are taken for granted because we either don't directly pay for them or if we do pay, the price we pay does not reflect the true value of the resource to society.*

Tourism is both dependant on clean drinking water for visitors together with the water resources needed to support the wide range of destination based activities and services which the industry indirectly relies on. This includes recreational activities such as surfing, swimming and fishing, spas and wellness centres, golf courses and of course natural landscapes and food production.

Water stewardship, water stress and the availability of clean water have now become important planning and development considerations for the tourism industry worldwide.

Source: PATA – Visitor Economy Report, December 2015

This perspective from a New Zealand outdoor adventure operator

- b) *Outdoor adventure view on the value of water to his business and personally:*

"I manage two tourism businesses and as a tourism operator we showcase our internationally renowned landscapes, waterways and outdoor activities and adventures that tourist and Kiwis love to experience. Our livelihood, that of our staff and the national economy, with tourism playing such a huge role, depend on it.

Tourists don't have to want to physically get in the water to be affected by water quality. The fact that they can't or it is not safe to has a massive effect on their overall impression of the destination and their destination experience.

*If you went into a bakery and there was a sign saying, "**don't eat the steak pies, they will make you sick and are not safe, but the mince ones are ok**" it is hardly going to inspire you to buy anything else in the shop and, worse, you would most likely tell a lot of your friends not to go there. Tourism works the same way.*

I am a 7th generation Kiwi. I have two boys just entering adolescence. I grew up playing in rivers, lakes and the ocean and they are some of my most treasured and influential experiences that make me who I am. These resources have always been valuable taonga and it is vital that they remain so and are protected and able to be used and enjoyed by our mokopuna and future generations. They are not just economically valuable; they make us who we are.

Tim Barke – General Manager for Kiwi Discovery & Queenstown Rafting

7. FRESHWATER FUNDING

In our view there are two shortcomings in the Clean Water consultation document that were also absent in the *Next Steps for Freshwater, April 2016 consultation document* : no real resolution of water ownership, and a lack of commitment to addressing water pricing.

It is difficult to reconcile the Government's claim that nobody owns water with the proposal to allow farmers and others the right to transfer or trade water allocations. There is an inherent assumption that water users with a consent, 'own the water' and the right to do with it what they like.

Until the question of water ownership and pricing are properly resolved it will be difficult to achieve efficient and effective management of our freshwater resources. New Zealand needs to move to some form of water pricing to achieve the best use of this valuable and finite resource.

Example: Water bottling companies are making a profit from water they get for free and exporting offshore New Zealand bottled water for a mere few hundred dollars' consent.

Water is the new 'global gold' - water creates wealth and we should value it appropriately!

In the very least until a system of water user pays and pricing is effected, an export tariff of a few dollars on each bottled water unit sent offshore should be paid per litre extracted. This could deliver back to the local regional council, millions of dollars that could be used for environmental restoration and clean-up water projects.

The government needs to set a clear timetable for developing and implementing a water pricing system so that agriculture, horticulture and other water users can make sensible investment decisions.

ENDORSEMENT OF TIA SUBMISSION

8. TECNZ supports and endorses the TIA submission on the *Clean Water: Consultation document (2017)*. We agree with the general comments and points raised in those submissions and urge the Ministry for the Environment to give them careful consideration.
9. TECNZ is not a science or environmental agency and therefore leave the analysis of monitoring, compliance and regulations of fresh water management to those organisations who have expertise in this area.

FOLLOW-UP PROCESS

10. TECNZ would welcome the opportunity to participate further in any follow-up process, including any formal meetings, to ensure that the potential impacts on tourism are adequately understood and constructive feedback provided.

End.