

New Zealand Recreational Canoeing Association – Conservation Strategy

DRAFT FOR CONSULTATION ONLY

21 February 2008

Introduction to the NZRCA and Conservation Strategy

1. The New Zealand Recreational Canoeing Association (NZRCA) is the national body representing recreational paddlers who use New Zealand's whitewater¹ rivers.
2. The NZRCA seeks to preserve whitewater resources and canoeable waterways and has the mandate of the New Zealand Canoe Federation to represent all canoeing disciplines on conservation matters.
3. The NZRCA's Conservation Strategy gives some general principles that will guide (but not necessarily determine) decision-making for the NZRCA on conservation issues. While these principles are neither exhaustive, nor applicable in all situations they should provide some guidance to members and interested parties on what whitewater resources the NZRCA is likely to value most highly and how it is likely to act in situations where the whitewater amenity value of a river section, catchment or region is potentially compromised. However, the NZRCA Conservation Strategy is a "live document" and is subject to change.

General Principles – Engagement and Participation

4. The NZRCA's preference is to engage with other interested parties² in a national, strategic and consultative approach to the management of river environments rather than the current piecemeal, adversarial approach.³
5. The NZRCA believes that a proactive national, strategic and consultative approach is likely to offer "wins" for all sides e.g., greater certainty of outcome, higher chance that rivers highly valued by paddlers will be recognised and preserved, higher possibility of eliminating, reducing or mitigating loss of whitewater amenity value.
6. The NZRCA will endeavour to inform, consult and work with its members and key constituents locally, regionally and nationally on issues of concern. In the case of an issue affecting whitewater resources and canoeable waterways it will particularly seek to work with those most affected by the issue.

¹ Whitewater includes all grades of whitewater as defined by the International Scale of Whitewater Difficulty and ranges from Grade 1 (moving water) to Grade 6 (unpaddleable except in rare circumstances).

²The NZRCA seeks to form relationships at a senior level with organisations such as power generators, major irrigation groups, key Government agencies (including the Ministry for the Environment and the Department of Conservation) and conservation and recreation groups with similar interests.

³ NZRCA's preference for a strategic, proactive approach is backed by others. See for instance, Cawthron Institute (2008), *ibid.*, pp.108-9, which comments on the need for such an approach in its report, "A comprehensive [strategic environmental] investigation could facilitate a more proactive approach to this issue. Absent such measures, pressure will grow over time, unless and until a significant and sustainable alternative emerges. There may be value in extending this investigation to other renewables, but hydro-electric development is a priority due to the potential scale, significance and irreversibility of effects".

7. Where the NZRCA has similar values to other recreational, environmental and other organisations it will endeavour to work with these organisations as appropriate. However, the NZRCA's primary concern and expertise is whitewater and the experience of paddling whitewater rather than the environment or other recreational pursuits.
8. The NZRCA seeks that the full whitewater amenity value of a river section is given serious weight in any decision-making and/or management process affecting whitewater river sections and catchments.⁴
9. The NZRCA will, in general, oppose legislation, policies, schemes or processes that potentially limit the NZRCA's ability to engage in decision-making and/or management processes or where the whitewater amenity value of a river section is less likely to be considered fully or given serious weight.

General Principles – River System Preservation and Development

10. The cost to New Zealand's river systems due to hydro electricity generation, irrigation and other schemes has already been very high⁵ and the NZRCA believes that the pressure on individual river systems is likely to get significantly greater in the future.⁶
11. In general, the NZRCA's preference is to preserve New Zealand's river systems as far as practical in their natural state, including natural flows and character.
12. The NZRCA will, in general, not oppose any legislation, policies, schemes or processes that are likely to reduce the long-term need to modify natural river systems, especially those with whitewater amenity value.⁷
13. The NZRCA will, in general, support legislation, policies, schemes or processes that promote potentially more appropriate or less environmentally damaging development of river systems.
14. The NZRCA will, in general, oppose legislation, policies, schemes or processes that are likely to result in a relative over-investment in hydro electricity or irrigation schemes.
15. The NZRCA seeks that the long-term and often irreversible environmental effects of hydro electricity generation or irrigation developments⁸, the loss of option

⁴ For instance, exclusion of recreational flows in any national policy statement, environmental statement or technical guideline considering flow regimes is less likely to result in the full whitewater amenity value being recognised.

⁵ By the Government's own calculations, over 80% of New Zealand's economic hydro electricity resource has already been developed (New Zealand Energy Strategy, 2007, Section 9.1.2)

⁶ See for instance, Cawthron Institute (2008), "Scoping Report for an Environmental Assessment of the NZ Emissions Trading Scheme and closely related measures", p xvi., "The ETS [Emissions Trading Scheme] price signal and the renewable energy preference are expected to significantly increase pressure to dam or divert more of New Zealand's rivers. A significant move to electric vehicle technology could further increase this pressure." The NZRCA would also note that few major hydro power schemes are proposed and so a substantial number of smaller schemes will be required to achieve the Government's renewable energy targets. Many of these smaller schemes are on rivers highly valued by paddlers.

⁷ Examples of this include promotion of alternative "renewable" electricity generation methods such as biogas, geothermal or wind and energy efficiency policies.

⁸ Effects can be long-lasting or largely irreversible either because the environmental damage itself is long-lasting or largely irreversible or because the cost of mitigation or true whole of life cost (including decommissioning and rehabilitation at the end of the scheme's life) is not fully accounted or provided for.

value⁹ and the true whole of life cost (including decommissioning and rehabilitation) are fully recognised and given serious weight in any decision-making and/or management processes involving a river section or catchment.

16. The NZRCA notes that hydro electricity generation schemes will often have larger, more significant and irreversible environmental effects than other “renewable” energy generation methods such as wind.¹⁰
17. The NZRCA does not consider schemes which cause significant and long-lasting or largely permanent damage to the river environment “sustainable”. Similarly, NZRCA does not believe the usage of the term “renewable resource” is appropriate when there are significant, long-lasting or largely irreversible adverse effects on the environment. While water can be a renewable resource, the river environment affected by the scheme is almost always not.¹¹
18. The NZRCA will generally seek to preserve any existing protection mechanisms for river sections, catchments or regions and their associated landscape value (e.g., Water Conservation Orders or under the Conservation Act).
19. The NZRCA will seek additional protection for river sections, catchments or regions with high whitewater amenity value where they is not currently adequate protection.

General Principles – Whitewater Amenity Valuation

20. Key determinants of whitewater amenity value for a river section include:

- a. Whitewater value
- b. Landscape value
- c. Use value
- d. Scarcity value
- e. Status value

21. The relative importance of individual determinants of whitewater amenity value is likely to differ by river section. It is not possible to say that any one determinant is more important for all river sections. For instance, a river with high status or scarcity value but low use value may be more highly valued than a river section with high use value but no special or scarce features.

22. Attributes that are present or important nationally or internationally are generally more highly valued than attributes that are only present within the river catchment, locally or regionally. For instance, a river that has features that are scarce nationally will generally be valued more highly than a river that has features that are scarce only regionally.

⁹ Option value is based on an economic concept which recognises that value can be lost if future uses of a resource are foreclosed by decisions made today. For instance, skills and equipment are continuing to change and so do the rivers paddled. Twenty years ago the Kaituna River was not paddled. Now the Kaituna River is one of the most commonly paddled (both recreationally and commercially) rivers in New Zealand.

¹⁰ For instance, see Cawthron Institute, (2008), *ibid.*, p. 81, “Biodiversity effects of other renewable energy, such as geothermal or wind power, have been noted but are generally minor and localised, as long as construction effects are minimised by good management through the RMA.” While this conclusion is specifically around biodiversity, pp. 108-9 of the report (see above) suggests that the conclusion is likely to be true about the environmental effects of hydro electricity generation more generally.

¹¹ See for instance, Cawthron Institute (2008), *ibid.*, p21 “Hydroelectric development creates largely irreversible local environmental changes While these effects are local, the values affected, such as biodiversity, may also be national or even international values.”

23. The wider geographical context (e.g., river catchment or region) is also an important determinant of whitewater amenity value for a particular river section. For instance, a section of river within an unmodified catchment or region of high natural character will generally be valued more highly than a similar section in a highly modified catchment or region.
24. The whitewater amenity value of a catchment or region can be greater than the sum of the whitewater amenity value of the individual sections. For instance, the concentration of wild and scenic, high quality whitewater runs available in the West Coast and Buller regions is scarce internationally and is a key reason why both regions are internationally renowned whitewater kayaking destinations. In this case the value of the whole (the West Coast region) is likely to be significantly greater than the sum of the individual components (river sections and catchments).
25. The development of a river section can have significant effects on the whitewater amenity value of other river sections, catchments or regions. For instance, the inappropriate development of only a few rivers within a highly valued region such as the West Coast, can impact on the whitewater amenity value of the entire region and other individual sections and catchments within it.
26. Cumulative effects on a river section, catchment, regionally and nationally must be considered in the assessment of whitewater amenity value.
27. Engagement with whitewater experts will be necessary to adequately determine the whitewater amenity value of a river section.

Whitewater Amenity Valuation – Specific Principles

A. Whitewater value

28. Whitewater value is primarily determined by the quality of the whitewater experience on the river section and the availability of the river section.
29. A mix of different grade and type of whitewater within a region and nationally is highly valued as it allows beginners to learn and develop on increasingly harder water and an ability to provide for a variety of paddler abilities and preferences.
30. Quality of the whitewater experience is generally determined by a number of elements including;
- number, variety and quality of hydraulic features (eg waves, holes, eddies, drops) within a section and at different flow rates¹²
 - overall character of river section including gradient and volume of river (e.g., low volume, high gradient pool drop vs. continuous low gradient but large volume river sections)
 - continuity of whitewater features
 - water quality

¹² Hydraulic features on the same river section may change dramatically with different flows and this variety in experiences on the same section is highly valued by paddlers.

31. Availability of the river section is determined by the percentage of time that the key whitewater features most highly valued by paddlers exist. This is primarily determined by flow.

B. Landscape value

32. The setting within which whitewater recreation occurs is an important determinant of whitewater amenity value.
33. River sections, catchments and regions of perceived high scenic beauty have higher landscape values.
34. River sections, catchments and regions which are natural or unmodified, of high natural character or high wilderness feeling are considered to have higher landscape values.

C. Use value

35. Use value is primarily determined by the frequency of usage and the value implicit in each usage.
36. A river that is run frequently is not necessarily valued more highly than a river that is run less frequently or rarely. Some rivers because of their difficulty, flow patterns, remoteness or other factors may not be run frequently but are highly valued when run. For instance, some rivers are highly valued precisely because the “right flow” is difficult to catch or because the remoteness of the river provides a wilderness experience where the paddler is unlikely to meet other recreationalists. In both these situations the value implicit in each usage may be exceptionally high.
37. The distance a user has travelled, and the amount of time and expenses required to paddle a river section can also be valuable indications of use value per trip.
38. The origin of users can be a valuable indication of a river’s relative importance locally, regionally, nationally or internationally.

D. Scarcity value

39. The extent to which the key landscape, whitewater values or type of experience¹³ for which the section, catchment or region is held are considered scarce within a wider context (e.g., catchment, region, nationally or internationally) is an indication of scarcity value.

¹³ For example, the experience of a multi-day wilderness river trip is quite different from a “park and play” session on a specific hydraulic feature(s) of a river section. Both are highly valued by paddlers.

E. Status value

40. The extent to which a river section, catchment or region has social and/or cultural value (e.g., historical importance, iconic status amongst paddling community) locally, regionally, nationally or internationally is an indication of status value.

General Principles - Mitigation and Negotiation

41. The NZRCA seeks to work constructively with managers and other users of river environments to explore ways to best manage the river, and when necessary eliminate, reduce or mitigate any potential loss of whitewater amenity value due to the scheme or management regime.
42. The NZRCA will seek comprehensive and appropriate mitigation for any loss of whitewater amenity value caused by a scheme or management regime.
43. In general, mitigation offered by the developer that does not contribute to whitewater amenity value will not be considered by the NZRCA as sufficient mitigation for any loss of whitewater amenity value due to the proposed scheme or management regime.¹⁴ If mitigation is not possible, then in general, the NZRCA will oppose the proposed scheme or management regime.
44. In determining the degree of mitigation sought, the NZRCA will consider the degree to which the design of the scheme or management regime attempts to minimise adverse effects on whitewater amenity value for the river section.¹⁵
45. The NZRCA will primarily and particularly seek mitigation for the key determinants and elements of whitewater amenity value for which the river section is most highly valued.
46. The NZRCA may consider mitigation outside the locality of the river section affected where the key values that the river section is held for cannot be mitigated satisfactorily or sensibly within the locality.¹⁶
47. The NZRCA is more likely to negotiate and reach a mutually acceptable solution for schemes or management regimes that affect river sections of lower whitewater amenity value.
48. If the NZRCA cannot reach agreement on comprehensive and appropriate mitigation then the NZRCA will, in general, pursue this by becoming parties to any relevant council, tribunal or court proceedings.

¹⁴ For instance, flat water or other non-whitewater recreational proposals for mitigation (e.g., mountain bike tracks) are not considered compensation for loss of whitewater amenity value.

¹⁵ An example of this would be altering the placement or design of a dam to minimise the loss of whitewater amenity value due to the scheme.

¹⁶ Examples of potentially acceptable mitigation include the development of whitewater resources in another location or additional formal protection for other highly valued river environments.