



NZRCA submission on the SPARC Outdoor Recreation Review.

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1 About the New Zealand Recreational Canoeing Association.

- 1.1 Formed in 1957, NZRCA (the New Zealand Recreational Canoeing Association) is the national representative organisation of canoe clubs and recreational kayakers throughout New Zealand. NZRCA is a voluntary, non-profit, incorporated society and is affiliated to the NZ Canoe Federation. The NZCF is in turn affiliated to the International Canoe Federation. NZRCA has delegated authority to represent the NZCF and all its member disciplines on advocacy issues.
- 1.2 NZRCA was known as the New Zealand Canoe Association until 1995/6. At this time the competitive canoeing disciplines were spun off into their own associations, the new umbrella body the NZ Canoe Federation was formed, and NZCA renamed itself to the NZ Recreational Canoeing Association to reflect its non-competitive advocacy role.
- 1.3 NZRCA represents both club and individual members and further affiliated clubs. Currently there are 30 member or affiliated Clubs with a combined membership of around 2,500 kayakers plus another 65 individual members. The figure of 2,565 in no way adequately represents the sum total of kayakers in New Zealand, as there are many who do not belong to clubs, and who have not joined NZRCA as individuals

2 Summary of Submission

- 2.1 Outdoor recreation is supposed to be an integral part of what we consider makes us New Zealanders, yet our experience is that no Government organisation advocates for it. All species live or die by the quality and quantity of their habitat, and our habitat is the New Zealand countryside and conservation estate. It is under immense threat from development, and there is no national debate on where the balance between development and lifestyle should lie.
- 2.2 Access to the remaining habitat is also becoming more problematic. A range of issues impact on access to the amenity and these issues seem to be worsening. They include lack or withdrawal of access across high-country stations (some of which are now owned by overseas interests), Maori land issues, withdrawal of access to the conservation estate (despite DOC's statutory requirement to foster recreation), restrictions on kayaking by harbour-masters (with no experience or knowledge of the activity), and bylaws created by local councils which restrict or endanger kayaking (often created in breach of statutory law).
- 2.3 Voluntary organisations, and NZRCA in particular, are in dire need of support. The feedback from the development interests – irrigation, farming, hydro, planners, engineers; the territorial authorities and government ministries; uniformly state that they value our presence in the development of policy initiatives in the two major resource processes (the Sustainable Water Programme of Action, and the Canterbury Strategic Water Study) being undertaken in New Zealand at present. This policy development process would exclude almost all recreational viewpoints if NZRCA failed to make this sacrifice. Our volunteer representatives are often the only person in these meetings that represents any form of outdoor recreation, is unpaid, has taken leave from their employment, or has forgone self-employment. This is an unsustainable burden on our organisation.

3 General Submission

- 3.1 Much of NZRCA's submission on the Outdoor Recreation Review is on issues that are effectively missing from the review. Hence confining ourselves to a simple answer to each of the questions in the submission form is not considered appropriate.
- 3.2 There are three major areas that NZRCA feels the Outdoor Recreation Review is either missing or severely under-rating. These are: preservation of recreational amenity, ensuring access to recreational amenity, and support for voluntary organisations.

Preservation of recreational amenity

- 3.3 Since about the time that Project Aqua was cancelled, NZRCA has noticed increased pressure to dam a host of smaller and more pristine rivers for hydro power. Many factors are conspiring to ratchet up that pressure.
- 3.4 Continuing growth in electricity demand, due to growth in both population and consumption, has resulted in electricity demand outstripping secure supply. This growth in demand is (by definition) unsustainable as it cannot be supplied without negatively impacting future generations. NZ's economic hydro potential is already 80% developed according to the New Zealand Energy Strategy. Much of the last 20% is all the small projects that nobody ever bothered with before. It's also all much of NZ's whitewater recreational amenity - the habitat for kayakers.
- 3.5 NZ has signed the Kyoto Treaty, committing to cut carbon emissions, which means the government is seeking to develop more "renewable" power. To some extent this means hydro-electricity. NZRCA is not against renewable power. NZRCA accepts that if NZ is to meet its emissions targets, all sectors must contribute. There is no strategy to accomplish this in the least damaging fashion however. Which is more environmentally damaging - one big hydro scheme on an already modified catchment, or 20 smaller schemes on smaller, wild and scenic rivers? NZRCA would support a fewer number of larger schemes on already modified catchments. The Waitaki North Bank project or each of the possible large Clutha schemes - Luggate, Queensberry, Beaumont, Tuapeka - could generate as much electricity as a host of West Coast rivers and creeks that are world-class destinations for kayakers
- 3.6 The proposed ETS (Emissions Trading Scheme) is a further disaster for kayakers. Agriculture produces about half our carbon emissions, yet gets an emissions holiday until 2013. This distorts the market and results in increased pressure on that part of the market not given a holiday, including electricity generation.
- 3.7 As well as the hydro generation pressures, increasing demand from developing countries for food, and in particular for dairy products is driving intensification of agricultural practices around the country. This results in flow being taken from rivers for irrigation, and pollution of lowland streams, lakes and aquifers.
- 3.8 To make exploitation of resources easier, the government is being driven to amend relevant legislation; e.g. the RMA and the Conservation Act (which may have a direct impact on the Kaituna and Mokihinui rivers), and set new policy e.g. the Energy Strategy, Emissions Trading and National Environmental Standards. These policies are often dressed up as environmentally friendly, but the reality is they often favour development.
- 3.9 All of these factors are combining in a kind of "perfect storm" threatening kayaking and in fact all in-stream recreation. We are staring down the barrel of NZ's whitewater resource being decimated, and the public and Government doesn't seem to know or doesn't care. The term "Government" here includes but is not limited to the Ministry of Sport, SPARC (which neither advocates for recreational amenity nor funds NZRCA to do so), the Ministry of Conservation (which under the Conservation Act is required to foster recreation, yet makes access very

difficult for many recreationalists), the Ministry for the Environment (which in the case of Central Plains Water has issued Requiring Authority status to an organisation which would destroy recreational amenity), Maritime NZ (which has made whitewater kayaking illegal via its Navigation Rule 91) and the Ministry of Local Government (which seemingly has no ability or interest to enforce standards of consultation or stewardship on Regional Councils) .

- 3.10 To give you an idea of the pressure on rivers from hydro development alone, here's a rough list of paddling rivers listed in Electricity Commission or power company documents from the last six months that are potentially facing hydro development in the next decade or so:

North Island

Wangaehu
Kaituna – “lower level”, “upper level” and Okere Falls
Whakapapanui
Papamanuka
Tarawera – at lake outlet, Falls and Te Matae Rd
Mohaka – lower (as early as 2010)
Rangitaiki (at Kiorenu)
Ruakituri – Waitangi Falls (above main sections, but may affect paddling)
Pohangina – Palmeston North favourite
Mangawhero

South Island

Mokihinui (ranked 7th amongst all NZ rivers for natural heritage value)
Wairau
Waitaha (Morgan gorge... one of NZ kayaking's last great problems)
Matakitaki (one of the most kayaked rivers in the Buller region)
Matiri (resource consents applied for already)
Taipo
Toaroha (potentially by 2011)
Kakapotahi (potentially by 2012)
Arahura
Nevis
Clarence

Ensuring access to recreational amenity

- 3.11 As mentioned in the summary, there are many issues conspiring to restrict access to our recreational amenity. Due to time constraints, comment here is limited to access issues on the the multi-day rivers as these are of exceptional value to kayakers. There are many other access issues NZRCA is also attending to.
- 3.12 In the draft DOC Conservation General Policy and National Park General Policy, vehicle use throughout the conservation estate was to be “Actively Discouraged”. Kayaks were classed as “vehicles”. It took a sustained campaign by the Mountain Bike Association, NZRCA and other advocacy groups to have this policy modified. At no point were the likes of the Ministry of Sport or SPARC active in protecting the recreational amenity. Aerial access is still under major threat due to these policies.
- 3.13 Access to many wilderness rivers can only be achieved via air. In particular, most multi-day wilderness rivers can only be accessed via air. These rivers are the some of the most highly valued by kayakers. The South Island has five multi-day whitewater runs (i.e. of more than grade 2; the Clarence is a unique 5-day grade 2 trip river suitable for beginner/intermediates), all total classics. From top to bottom these are the Karamea, the Upper Waiau, the Landsborough, the Waitototo, and the Waipara. All have access issues, mostly due to DOC.

- 3.14 The Karamea is the South Island's only 4-day whitewater run. It is cut in half by the Tasman Wilderness Area. NZRCA amongst other organizations had to fight for the retention of the Roaring Lion Hut, which provides shelter for kayakers wishing to attempt this demanding trip without having to carry the extra weight of a tent. In this we succeeded, however the wilderness area that was eventually gazetted does still eliminate the best 1-day trip.
- 3.15 The Upper Waiau is the only river without access issues created by DOC, but probably only because it is the only multi-day river not on the DOC estate. The Upper Waiau is on St James Station and has access difficulties of its own as the station owner does not permit anybody to drive from Lake Tennyson to the river, despite the existence of a paper road.
- 3.16 The Landsborough has been kayaked since about 1974. The Hooker-Landsborough Wilderness Area eliminates any access upstream of Kea flat. This removes a day from the 3-day journey, and the eliminated day contains both the most challenging paddling and the most spectacular scenery of the entire trip. Kayakers were not consulted when the wilderness area boundaries were determined, nor did any Government agency seek to ensure access to the recreational amenity.
- 3.17 Access to the Waiatoto is currently threatened by an imminent change to the Mt Aspiring National Park Management Plan. The draft of this plan proposes to eliminate the landing site at Bonar flats, which kayakers have used for years for this classic kayak trip. NZRCA's position is simple:
- Kayakers are the #1 and probably only user group in the middle Waiatoto valley.
 - DOC Haast say they do not know of any parties that have walked up into the middle reaches this century. So there is very little likelihood of conflict with other user groups, by our use of aerial access.
 - We have been told that 10,000 deer were flown out of the backcountry by Haast helicopter operators in the last year. These won't all be from within MANP, nevertheless many of them will be and the increased aerial traffic by kayakers on top of these operations is insignificant.
 - Park Management Plans are there to manage conservation and usage issues. We are the sole user group, and we impact no others. Therefore we struggle to understand why it is proposed that the Bonar Flats site be removed.

DOC's reply was that the change was necessary to provide a buffer for the Olivines Wilderness Area.

The Olivines plateau, at the heart of the Olivines Wilderness Area, is 40km (probably a week's tramp for most people) distant from Bonar Flats. Between the Bonar Flats landing site and various points on the Olivines Range and plateau are:

- areas outside of MANP
- privately owned musterer's huts
- grazed land
- huts within MANP
- the landing site at Bevan Col for mountaineers wanting to attempt Aspiring.

It is difficult to see why the Bonar Flats site is being singled out given the lack of impact on any other users, the other more immediate incursions near the Olivines Wilderness Area, and the fact that many other parts of the wilderness area border are not buffered by no-fly zones. The wilderness area has an arm wrapping around the heavily trafficked Mt Aspiring and extending north to the top of Bonar Flat. Had the sole user group in this area been consulted with, the obvious boundary would have been at the Pearson confluence, only 3km south but upstream of the best whitewater on the Waiatoto. However kayakers were not consulted when the wilderness area boundaries were determined, nor did any Government agency seek to ensure access to the recreational amenity.

- 3.18 The Waipara has been made illegal by the gazetting of the Olivines Wilderness area. Only a small kink in the boundary, down from Bevan Col to Lake Waipara, would have been needed to

place the put-in outside of the wilderness area. Yet again, kayakers were not consulted when the wilderness area boundaries were determined, nor did any Government agency seek to ensure access to the recreational amenity.

- 3.19 There are a vast number of other rivers which NZRCA is experiencing access issues on, and which there is not time to comment on here. In relation to those few and treasured multi-day rivers however, one further note should be made. In recent news Horizon Energy and Opotoki District Council are discussing the lifting of the Water Conservation Order on the Motu, so that 4 dams could be constructed. The Motu is the North Island equivalent to the Karamea, a 4-day wilderness trip of grade 3-4 difficulty and was the first ever river protected by a WCO. A Water Conservation Order is the river equivalent of a National Park. Whether it be by hydro-developers or DOC, the crown jewels of NZ's whitewater recreation amenity are threatened

Support for voluntary organisations.

- 3.20 Voluntary organisations in this sector are often under huge pressure, which is steadily increasing due to the proliferation of competing developmental interests, increased (and unasked-for) safety and education legislation, and access difficulties.

- 3.21 In the last year or so, NZRCA exec members have submitted, negotiated or presented to at least the following bodies / forums:

- Maritime NZ
- Water Safety NZ
- NZ Business Council for Sustainable Development
- Sustainable Water Programme of Action
- two different Reference Groups of the SWPoA (7 full-day events)
- Sustainable Land Use Forum
- Emissions Trading Scheme
- Arnold HEP (Hydro-electric project)
- Kaituna HEP
- 10 Mile Creek mining application
- NZSAR
- King Country Energy Mangahao Releases
- Maori Land Court
- Genesis Energy Tongariro Releases
- Genesis Energy Wairehu Canal construction
- Walking Access Consultation stakeholder forum
- Whakamarino Releases
- NZ Energy Strategy
- MNZ Non-powered craft forum
- Queenstown Lakes District Council
- Skippers Canyon Jet Safety Audit
- NZ Kayak Instructors forum
- NZ Paddle Industry forum
- Jet boat NZ
- Wairau River HEP
- Wainongoro HEP
- NZ Outdoor Recreation forum
- National Environment Standards roadshow
- Living Rivers
- Central Plains Water
- Canterbury Strategic Water Study
- Canterbury Strategic Water Study Stage II (16 full days of meetings all over Canterbury)
- Steering Committee of CSWS Stage III (4 meetings so far),
- Mokihinui HEP
- Matiri HEP

- Waitaha HEP
- Mokau HEP
- Disputes Tribunal, vs Greater Wellington Regional Council
- Waimakariri Brown's rock HEP
- NZ River Recreation Survey
- Tekapo Whitewater Trust
- Hurunui River Water Conservation Order application
- MAF Didymo stakeholder group
- National Party Water policy Forum
- Nevis River - Kawarau Conservation Order amendment
- Mt Aspiring National Park Management Plan
- .. and the above does not show the time spent on numerous support functions.. meetings, minutes, newsletter publishing and mailing, fund-raising applications, accounts, website maintenance, travel, accommodation, bookings etc.

3.22 At many of these forums, the NZRCA representative has been the only person not paid to be there. One of our members estimates he has attended 60 meetings where he has been the only unpaid representative. At the National Party water policy forum there were approximately 70 people.. MPs, policy analysts, representatives from Fonterra, Dairy NZ, Federated Farmers, NZ Business Council for Sustainable Development, Irrigation NZ, NZ Wastewater association, Hydrologists Society, NIWA, several regional councils, Ngai Tahu, Tainui, several other iwi, Ecologic, Fish & Game, Forest & Bird and NZRCA. NZRCA was probably the only organisation with an unpaid representative.

3.23 In many of these forums, it would have been entirely appropriate for SPARC to have been represented, or at least to have funded a representative from an outdoor recreational organisation such as NZRCA. Organisations funded by both the private sector and the government are degrading NZ's recreational amenity without a murmur from the government bodies responsible for recreation and health.

3.24 There is nobody representing many categories of recreationalists such as families simply picnicking and swimming. It is ironic that a picture of a child swimming, and their father on a sit-on-top, is used on the cover of the Outdoor Recreation Review discussion paper. There is no Government organisation that is representing their interests.

3.25 The Outdoor Recreation Review does state that "*There is evidence that the sector is experiencing pressure.*". However the solution seems to be limited to an "*Independent review of the structure of the sector identifying ways to create efficiencies of funding and service delivery*".

3.26 NZRCA believes that this finding does a grave disservice to volunteers who provide exceptional "service delivery" often with no funding whatsoever. An independent review merely "*to create efficiencies*" is worse than useless. Not only would it not provide help when what is clearly needed is active support, it would divert funds sorely needed at the coalface.

4 Answers to questions on submission form

Review findings

- 4.1 Do you have any corrections to any details in the initial findings paper?
A: This question is not applicable. In this case, the devil is not in the details.
- 4.2 Do you have any comment on the initial findings of the review?
A: See general submission.

A healthy state for outdoor recreation

- 4.3 Do you think that the description of characteristics captures what is required for a healthy state for outdoor Recreation?
A: No. A healthy state requires habitat for outdoor recreation, and access to that habitat.
- 4.4 Do you have any suggestions about how this description could be improved?
A: Difficult as it is very generalised.
- 4.5 Do you agree that a national strategy for outdoor recreation should focus on the six areas of action identified above?
A: Absolutely not. There is no mention of any of the three key areas identified by NZRCA (preservation of amenity, access to amenity and support for volunteer organisations). Initiatives such as a “research programme”, “agreed strategy”, “governance development”, “better channels for communication”, “social marketing messages”, “dissemination of information”, “transparent criteria and processes” etc. are woolly consultant-fests that soak up huge amounts of time and resource whilst doing to nothing to address the critical and future-determining issues that NZRCA is facing.
- 4.6 What other areas of focus do you consider important?
A: See general submission.
- 4.7 What do you consider to be the priorities for taking action?
A: See general submission.
- 4.8 Where do you see your organisation playing a significant role?
A: NZRCA does play a significant advocacy role. We need support to continue that role in the face of increasing pressure on NZ’s whitewater amenity. See general submission.

5 Conclusion

- 5.1 Kayaking like many outdoor recreational activities in New Zealand contributes to the physical and mental well-being of the nation, can be pursued through whole-of-life, and has a strong cultural link to our shared heritage.
- 5.2 As with many other activities, kayaking can be practiced in an urban, semi-urban or a completely natural outdoor environment. Rugby requires expensive facilities for the competitive aspects, but anyone can chuck a ball about on a beach or a domain somewhere. It's all part of a spectrum. Cycling has many varieties from circuit racing to road racing to BMX to MTBs.
- 5.3 Kayaking is somewhat different. Although we have racing paddlers on lakes and slalom paddlers on very expensive artificial courses, the majority of New Zealand kayakers consider that to be able to paddle on free flowing water in natural surroundings is their lifestyle goal. It is no co-incidence that the Coast-to-Coast, which demands a huge commitment from entrants, continues to attract 1000 competitors each year. After all the training and sacrifice, the setting is everything.
- 5.4 The absolute elite of our sport are those who paddle the "impossible" sections of our wildest rivers. We excel at this level of the sport across the globe. Our male and female elite paddlers are the among the best in the world. The elite paddlers of the world make the long journey to New Zealand to experience the rivers that created those New Zealanders they meet at home. There are no Gold Medals at this level of the sport. These people do this firstly, because they can, and secondly, for the pure personal internal sense of achievement. There is almost no popular culture of seeking external affirmation or recognition for such feats in kayaking.
- 5.5 Kayaking on river and coast is growing steadily in New Zealand because we have the great New Zealand outdoors and we have access. We need recognition from SPARC that both access and 'habitat' are under threat and need to be an integral component of any discussion of outdoor recreation in New Zealand. There are many other sports that we could include that would follow the same basic parameters, but we do not speak for them. We urge SPARC to consider the issues we have raised, because they impact across a wide range of highly treasured values we consider part of our shared culture and heritage.

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