

27 July 2025



National Direction Consultation
Ministry for the Environment
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WELLINGTON 6143

By email: freshwaterND@mfe.govt.nz

Proposed Changes to National Direction

Tourism Industry Aotearoa welcomes the opportunity to submit on the proposed changes to national direction as part of the wider reforms of the resource management system in New Zealand.

In this submission we provide a broad outline of the importance of incorporating tourism industry needs and perspectives across the national direction framework, with our specific feedback focussed on the Freshwater National Direction consultation.

Tourism industry Aotearoa

TIA is the peak body for the tourism industry in Aotearoa New Zealand. With around 1,200 member businesses, TIA represents a range of tourism-related activities including hospitality, accommodation, adventure activities, attractions, retail, airports and airlines, transport, as well as related-tourism services.

TIA is focused on ensuring the balanced growth of the industry to drive broad benefits, and this is articulated in our key guiding documents and programmes. This includes the tourism industry's strategic framework, *Tourism 2050 – A Blueprint for Impact, He Pae Tukutuku*.¹

This has the Vision of '*Enriching Aotearoa New Zealand through a flourishing tourism ecosystem*'. This Vision is centred on the positive role of tourism for the broad betterment of New Zealand and its people across a balanced framework – Economic, Community, Visitor and Environment.

Tourism 2050 has just ten Actions that are the most important strategic workstreams to advance to enable the industry to achieve its Vision. Three of these are related to our environmental performance, including Champion Predator Free and Biodiversity, Transform Tourism and Conservation, and Build Sustainability Capability.

As an industry, we are committed to protecting and improving the natural environment in which tourism operates, and we do this because the well-being of our environment is vital to the success of the industry itself. For this reason, TIA consistently advocates for the interests of tourism where policies or actions of others have a material impact on the ability of tourism to deliver on its potential as a productive part of the New Zealand economy.

Contribution of Tourism

Tourism is a major part of our society and economy. It is 17.2% of our exports, 7.5% of GDP and 10.7% of employment.² Tourism is important for Aotearoa New Zealand, as it is for regions across the country.

¹ <https://www.tia.org.nz/tourism-2050/>

² <https://www.stats.govt.nz/information-releases/tourism-satellite-account-year-ended-march-2024/>

In terms of exports, this is very important for considering the interests of tourism in relation to other sectors, and why we must do tourism right in our country, for the betterment of all New Zealanders. For instance, in the year-ended March 2024. Tourism exports were \$16.7b compared to \$21.1b for Dairy, with the next sector, Meat and Meat Products at \$8.7b. Furthermore, tourism hasn't yet returned to its pre-COVID levels where over the preceding five years Tourism was consistently ahead of Dairy as New Zealand #1 export industry. The contribution and potential of tourism are both significant for our country.

Tourism Growth Roadmap

The Government has established a clear growth agenda for the tourism industry that is being advanced through the recently released Tourism Growth Roadmap.³ Notably, the Roadmap has the target to double tourism export value by 2034, meaning that the contribution of tourism to our economy will significantly increase over coming years.

A key feature of the Roadmap is its recognition that the supply-side of the industry is important. While the initial focus is on boosting demand, over the medium term the focus will be on how we manage our place to ensure it is an outstanding destination in a competitive global tourism marketplace. In this, it matters how New Zealand provides infrastructure, manages our environment and delivers visitor-specific products and services. With the environment, our biodiversity, landscapes and clean waters matter a lot.

Similarly, with over 70% of New Zealand's exports being reliant on natural capital, all exports sectors have an interest in the quality of our stewardship of our natural systems.

TIA Feedback on the Freshwater National Direction

The following represents a broad tourism industry perspective as users and beneficiaries of New Zealand's freshwater resources. We appreciate that this is not a technical position that we see is inherently set out in the national policy statement, but our wider perspective is important for what the NPS-FM ultimately achieves. For tourism, this is all about freshwater that has high landscape, amenity and visual qualities, while being safe to participate in and engage with. These outcomes are intuitive, and this needs to be part of the NPS-FM in future.

We note the call from Business New Zealand that the NPS-FM must be balanced, flexible, practical, evidence-based and enabling. We also note the call from Business New Zealand that the NPS-FM must better reflect the interests of all water users, and to ensure a more practical, balanced and durable approach to freshwater management.

TIA agrees with this assessment, and our essential request is that tourism is clearly identified as a 'user of interest' of New Zealand's freshwater resources, and that this is reflected within the NPS-FM in practical ways that enable users of the policy statement, particularly councils, to apply it with confidence.

TIA's specific points of feedback:

1. **Place of Tourism.** Recognise the importance of tourism in freshwater conversations and processes, and that tourism is a productive export sector that benefits from the quality of New Zealand's freshwater resources. Our visitors see and experience the quality of our landscapes, including freshwater, and this is a key driver of visitation and a factor in visitors' satisfaction with their travel. Tourism businesses offer a multitude of freshwater-related activities, including fishing, lake cruises, jetboating, rafting, canoeing, parasailing, guided tours, and many more. TIA is concerned that

³ <https://www.mbie.govt.nz/immigration-and-tourism/tourism/tourism-growth-roadmap>

any degradation of freshwater standards will impact visitor experiences and thereby New Zealand's reputation as a destination that operates to high environmental standards.

Recommendation: Specifically reference tourism as a 'user of interest' in the new NPS-FM, including setting out the role that freshwater plays in the visitor experience and our country's reputation as a quality visitor destination.

2. **Timing of Implementation.** TIA submits that changes should only be made once the overall framework for the resource management system is in place. TIA's view is that the proposed changes to NPS-FM are significant and that these should only be advanced once the Natural Environment and Planning Acts are in place. In particular, we expect that the Natural Environment Act will be important in setting the basis within which the new NPS-FW will sit. It will be important that these are set consistently and receive the same level of scrutiny through the consultation process.

Recommendation: Do not implement any changes to the NPS-FM until the wider suite of changes are established through the enactment of the Natural Environment and Planning Acts.

3. **Role of Te Mana o te Wai.** The consultation material is signaling a move away from Te Mana o te Wai which is of concern for TIA in that it signals a weakening of the protection for freshwater systems in our country. On the other hand, TIA considers it important for the NPS-FM to strike a balanced position to reflect both the interests of water users and the more conceptual standards that reflect the needs of wider society. In future, these may not be expressed the same way, but the core concepts remain relevant.

Recommendation: Ensure core concepts of Te Mana o te Wai are carried forward into the new NPS-FW alongside the interests of users.

4. **Values.** TIA's assessment of the Values for the National Objective Framework finds that none of the existing values incorporate the interests of tourism in freshwater and how the freshwater system is managed. As set out above, tourism has an interest as a user of freshwater resources, and as a beneficiary of water being managed well (landscape, amenity values, etc.). Not all destinations are reliant on freshwater, but for some their freshwater resources are central to these places. For instance, in places like Taupō, Mackenzie District and Central Otago, their lakes and rivers are integral to the destination and warrant specific consideration within the overall system, including how councils manage their freshwater resources. A solution to this is to include 'Destination Attractiveness' as a value.

Recommendation: TIA submits that a value around 'Destination Attractiveness' be established to ensure consideration of the quality of freshwater for visitor destinations.

5. **Attributes.** TIA notes that the attributes are all technical in nature. While this reflects their role for setting targets and minimum thresholds, we consider that there is also merit in more subjective attributes to reflect the role of freshwater in landscapes and the quality of the visitor experience. Visitors see the 'whole', and this is important. As such, the attributes we measure should reflect this more qualitative aspect that people see and experience, including visitors.

Recommendation: TIA submits that an indicator of the 'qualitative' attribute of the state of freshwater resources should be established to sit alongside the more quantitative attributes.

We would be most pleased to elaborate on any points raised in the submission. If so, please contact Bruce Bassett on 021 609 674 or bruce.bassett@tia.org.nz.

Ngā mihi,

A handwritten signature in blue ink, appearing to read 'R Ingram', followed by a period.

Rebecca Ingram
Chief Executive