



tourism
INDUSTRY

ASSOCIATION NEW ZEALAND

**Draft West Coast Tai Poutini Conservation Management
Strategy**

5 October 2007

Introduction

1. This paper is from the Tourism Industry Association New Zealand (TIA), located at level 4, Tourism and Travel House, 79 Boulcott Street, Wellington.
2. Attached as Appendix 1 are details about our organisation and who we represent.
3. The paper provides comment on the Draft West Coast Tai Poutini Conservation Management Strategy.
4. If you wish to contact us regarding this submission, in the first instance, please telephone Geoff Ensor, Sector Manager on 496 4889 or e-mail geoff.ensor@tianza.org.nz or Simon Wallace, Policy Manager on 04 494 1842 or e-mail simon.wallace@tianza.org.nz

Background

Conservation and Tourism

“...enjoying public conservation lands and waters is a popular activity for many New Zealanders and overseas visitors, and outdoor recreation is often perceived by many to be central to our identity and way of life...”¹¹

5. The tourism industry supports balanced conservation management policies that sustain economic development, provide a social return for New Zealanders and allow memorable visitor experiences to be delivered. Sustainable tourism businesses that provide a high quality product are dependant on a collaborative working relationship with the Department. Our Association supports the strong environmental focus of its Members who operate concessions on public conservation land. Their businesses and livelihoods depend and rely on the way they use and care for the natural surroundings and in this regard, we strongly believe managed visitors are the most responsible users of the public conservation estate.
6. New Zealand’s environment and scenery is a major draw card for overseas visitors forming the basis of the “100% pure” marketing brand, which underpins the country’s gross domestic product (GDP) and economic growth. The land, sea and air operators that ply the national parks and public estates ensure domestic and international visitors are able to enjoy New Zealand’s natural environment and it is essential that this access is continued. Tourism businesses also invest and develop public amenities and infrastructure that improve the quality of the visitor experience.

7. TIA supports the following principles for conservation management:
 - a) policies that sustain economic development and tourism businesses while protecting the environment in which they operate;
 - b) legislation interpreted and applied in a way that leads to the achievement of a mutual relationship between use and conservation;
 - c) lands that provide an economic and social return to New Zealand in a way that is consistent with the values that New Zealanders place on them;
 - d) a fair rate paid by concessionaires for use of public lands to run their businesses in return for a fair consultative process in the management of that land;
 - e) meeting visitor expectations of excellence by insisting concession holders meet quality industry standards;
 - f) ongoing and robust review of DOC's research priorities and capabilities so future decisions are always made on a sound evidence basis;
 - g) policies that are cognisant of the variety of effects imposed by each user group and the nature of benefits they receive from this use; and
 - h) consistent New Zealand wide conservation management policies and standard operating procedures that acknowledge locally justified variations.
8. TIA acknowledges that visitor numbers are growing and increasing the pressure on the natural resources and infrastructure of New Zealand's national parks and public lands and believes it is vital that the Department continues to work closely with the tourism sector to effectively manage this growth. In many cases we believe the issue is one of under-management rather than overcrowding – prescriptive limits are one tool, but a stronger more effective one is collaborative management that seeks operational and facility based solutions. In this way a park's visitor-carrying capacity can be increased to meet demand without increasing social or environmental impact.
9. TIA believes that mutual acceptance of the above principles lays the foundation for a sound and effective working relationship with the Department, based on a "no-surprises", consultative approach to the management of issues as they arise, as well as encouraging free and frank discussion. It is essential that conservation management strategies or plans are disseminated appropriately, at a national level, and are consistent with legislative criteria.
10. The submission on the West Coast Draft CMS is consistent with the above stated aims of TIA for a balanced conservation management strategy that acknowledges the contribution tourism makes to the economy along with the need to preserve New Zealand's natural environment for future generations.

Comment

Section 3.2.3.7 Tourism Associates / page 102

11. TIA values the Department's efforts to engage with it over this and other planning processes. In support of the submission by Latitude Nelson, we would also like to see greater involvement of regional tourism organisations (RTOs) in the planning process for tourism on public conservation lands (e.g. National Park Management Plans). This process should extend not only to RTOs based within the conservancy, but also to other RTOs that have a physical link with the conservancy and with concessionaires operating within the conservancy (e.g. Latitude Nelson and the Heaphy Track).
12. We suggest that the Department of Conservation liaise with all RTOs that have an interest and connection with the West Coast *Te Tai O Poutini* conservancy (e.g. Latitude Nelson, Mackenzie Tourism, Lake Wanaka Tourism, Destination Queenstown and Destination Fiordland) during the planning process.
13. Establishing good working relationships with TIA and RTOs will help ensure that strategic planning documents are aligned, and that effective communication takes place between the tourism industry and the Department.

Recommendation:

14. TIA would like to see inclusion of the words 'Tourism Industry Association New Zealand' and 'regional tourism organisations' within section 3.2.3.7 to clearly identify these agencies as a tourism associates.

Section 3.5.1 / 5 / Concessions / page 212

15. Commercial recreation carried out on public land requires a concession. TIA is currently in negotiations with DOC over the best way to allocate concessions when demand for opportunities exceeds supply. Concession terms and fee payment regimes are also being discussed.
16. TIA believes strongly that outdoor recreation and the environment will be the winner if concessionaires can plan confidently for the future. For this reason, we believe that tendering of opportunities already held by good performing concessionaires should be avoided. A detailed submission outlining the Association's reasons for this can be found at the following link:

<http://www.tianz.org.nz/Files/SB1206DOC.pdf>

Recommendation:

17. That the Department's West Coast conservancy awaits the outcome of TIA/DOC negotiations on concession allocation before undertaking any tendering processes over incumbent operators. And for this reason, the CMS remains non-specific over allocation mechanisms.

Section 3.6 Recreation and Tourism / page 216

18. Tourism, recreation and commercial recreation:
19. The meaning of the term 'tourism' in New Zealand is often misconstrued. Some interpret it as applying to international visitors only, for others it conjures up images of coach travel and 'volume'. Tourism is in fact international visitors and New Zealanders travelling to, from and within New Zealand, seeking a range of different experiences - interacting with communities, each other and the environment.
20. The point we want to make strongly is that using 'tourism' in the context of the West Coast CMS is misleading. Recreation is recreation whether it is commercially delivered or enjoyed independently. Some choose to explore and experience New Zealand without making use of commercial operators, while others prefer to pay for the experience and utilise the skill and knowledge of professional guides; both options complement each other and add value to outdoor recreation by offering choice.
21. There is increasing evidence that guided tours are finding favour with New Zealanders who are seeking a well informed and safe experience. In addition, small tightly controlled groups are likely to have far less impact on the environment.
22. Operators with significant industry experience are reporting increasing demand for softer back country trips e.g. clientele that prefer not to camp, carry a backpack of more than five to six kilograms and who expect to walk on well formed tracks. While it is vital that we preserve the classic backcountry experience, where fitness and self reliance are required, we also need to recognise the growing demand from international visitors and New Zealanders for the softer back country experience.
23. Confusion in the Department's own mind on this issue is apparent on page 218 where the following statement is made "*general strategies for managing all types of authorised uses of public conservation lands, including recreation/tourism concessions...*"

Recommendation:

24. Any references to 'tourism' within both this section and the entire CMS are (where practical) replaced with the term 'commercial recreation'.

Section 3.6.1 / Page 217 / second Paragraph:

“The Department’s role in fostering recreation seeks to ensure that people receive in full measure the benefits of recreation and enjoyment from public conservation lands, whereas tourism uses are allowed provided that this is not inconsistent with the protection of natural, historic or cultural values or the enjoyment of others.”

25. As previously mentioned, TIA is concerned about the split between recreation and tourism. The key point of this section is accurately encapsulated in the next paragraph i.e. *“This chapter recognises the different, and sometimes conflicting, aspirations of people to enjoy public conservation lands and seeks to find a balance...”*

Recommendation:

26. That the last three lines of the second paragraph, from *“whereas tourism...”* be deleted.

Section 3.6.2 / Overview / Page 219 / third paragraph:

27. The last two lines read *“Scenic flights provide many people with a chance to view remote or rugged terrain with minimal effort.”*
28. While this is true, we believe it is misleading and fails to encapsulate the true value of aircraft in a scenic capacity i.e. aircraft enable all people irrespective of age, health or physical ability the opportunity to enjoy New Zealand’s most remote and rugged terrain.

Recommendation:

29. The last two lines of the third paragraph are deleted and replace with:

“Aircraft enable all people irrespective of age, health or physical ability the opportunity to enjoy New Zealand’s most remote and rugged terrain.”

Section 3.6.2.2 / 18,19,20

30. TIA supports strongly the theme of engaging and working with local communities along with targeted research.
31. We note, however, in point 20, the need to involve other people and organisations in research is only very lightly touched upon.

32. TIA believes that DOC should be far more proactive in engaging with a range of stakeholders as part of the research and monitoring process.
33. A degree of cynicism will exist if the methodology associated with research/monitoring is not understood and thought to be flawed. Such an approach threatens to undermine the results and DOC's management response. DOC and Environment Southland have recently embarked on a process to develop a visitor survey for Milford Sound – a large range of local and national stakeholders are engaged in this process and TIA believes the outcome will lead to appropriate, effective and well supported management decisions.

Recommendation:

34. That an additional paragraph is inserted clearly identifying the importance of a collaborative approach to research and monitoring.

Section 3.6.2.2 Recreation Outcome Zones / page 225 – Policies 1. / 4.

35. We note that it is proposed to exclude aircraft landings (with some exceptions) from the Arthur's Pass National Park, Paparoa National Park and the Waitangiroto Nature Reserve.
36. We believe that the CMS should retain sufficient flexibility for aircraft operators to apply for a concession and have their application judged at that time. Given the long life of the CMS and associated park management plans, the new generation 'quiet' aircraft along with the ability of pilots to mitigate effects by use of agreed routes, altitudes and operating techniques, we believe DOC should allow aircraft the same privileges as other concessionaires. As an example, this would include the right to apply for a concession and have the application judged on its merits i.e. it is important to consider all concession applications on their merits based on their beneficial and adverse effects.
37. In point 4., the Department states it may seek over-flight restrictions in some areas. While this may be appropriate for the White Heron Colony at Okarito for example, TIA does not generally support over-flight restrictions.
38. A prescriptive approach to airspace management has already been investigated in other national parks by DOC and discarded in favour of formal codes of practice and the development of strong working relationships with aircraft user groups. A range of noise mitigation measures are available to aircraft operators including changes of routes, altitudes and the addition of 'quiet' technology.
39. New Zealand's weather and topography do not lend themselves to restrictions on airspace and it is likely that flight safety could be compromised by doing so.

Recommendation:

40. Point 4. is enlarged upon to show the preferred approach to aircraft management i.e. user groups and formal codes of practice and that the Okarito restricted airspace be used as an example to show the Department's reason for including airspace restrictions as a possible management tool in very unique cases.

Policies 2. And 4. / page 227

41. **Policy 2.** TIA supports concessionaire activity into gazetted wilderness areas providing group size and frequency are compatible with the area. We note via the Aspiring National Park consultation that DOC does not wish to allow concessionaire activity into wilderness areas within that park. TIA disagrees with this stance and supports the West Coast CMS position.
42. **Policy 4.** TIA supports the Departments intent to liaise with aircraft operators rather than pursue airspace restriction over wilderness areas. We believe better compliance will result from a more collaborative, educational approach.

Recommendation:

43. Policies 2 and 4 are retained. .

(6. / page 230) and (7. / page 233)

44. TIA questions the restriction of 20 landings per year for 'irregular and occasional' situations. If the intent of the limit is to manage effects and retain the character of the zone, then a proposed annual limit appears to be an extremely blunt instrument with which to achieve that outcome.
45. Such an open approach using a random figure of 20 landings may mean all those landings may be used on one day or one week or one month. This is not a meaningful and equitable way to approach landing limits and will not achieve the desired outcome.
46. Cause and effect are at the heart of this issue. TIA believes DOC should remove the annual limit approach in favour of a daily limit (this could even include conditions about time of day etc). At first glance this may appear too 'open', but TIA believes it would provide a far greater degree of control and really address the concern more fairly.

Recommendation:

47. TIA believes DOC should remove the annual landing limit approach in favour of a daily limit (this could even include conditions about time of day etc).

10. / page 236:

48. We note that it is proposed to exclude aircraft landings (with some exceptions) from designated front country zones and we question the logic of this restriction.
49. It could be argued that any negative impacts of aircraft experienced in the front country zone are to a visitor audience that has little expectation of a natural-quiet remote zone experience and whose tolerance for aerial activity is high. Refer Booth *et al* research on page 248 of this CMS.
50. We believe that the CMS should retain sufficient flexibility for aircraft operators to apply for a concession and have their application judged at that time. With new generation ‘quiet’ aircraft and the ability of their pilots to mitigate effects by use of agreed routes, altitudes and operating techniques, we believe DOC should allow aircraft the same privileges as other concessionaires. As an example, this would include the right to apply for a concession and have the application judged on its merits i.e. it is important to consider all concession applications on their merits based on their beneficial and adverse effects.

Recommendation:

51. That the proposed restriction on aircraft concessions in front country zones is relaxed and applications be judged on their merits at the time.

Section 3.6.2.8 / Intense Interest Sites / page 236

“Intense interest sites are places where very high public use occurs within a relatively confined area. They are tourist ‘hot spots’...”

52. TIA seeks the removal of the term ‘hot spot’ from this CMS and indeed any DOC publications. We are hearing the term used in a variety of contexts including as a descriptor of areas with high pest numbers or in which a particular species is threatened. It is emotive language and should not become part of mainstream DOC or tourism language.
53. We believe that the term was coined in Southland and despite our best efforts, has spread into other regions. It means different things to different people and we don’t believe it has any place in professional land management or tourism publications.

Recommendation:

54. The term ‘hot spot’ is removed from the West Coast CMS and from other DOC publications. The description of intense interest sites (as shown below) is adequate - it does not need to be embellished with the term ‘hot spot.’

“Intense interest sites are places where very high public use occurs within a relatively confined area.”

3. / page 237

“a) Group sizes should be less than fifty people per group...” (As it applies to intense interest sites)

55. We notice the word ‘should’ however TIA wishes to signal that over the next 10 years significant developments in coach design and capacity is likely. It is possible that some will carry over fifty people; given the carbon efficient nature of coach travel we seek reassurance that number of over fifty will be favorably considered as part of any concession application.

Recommendation:

56. TIA seeks reassurance that a visitor number of over 50 will be favorably considered as part of any concession application for intense interest sites.

(Policies / 2. / page 248) and (point 10. a) and b) page 250)

“The department should work with aviation controlling authorities to avoid or otherwise minimize the adverse effects of aircraft...”

57. TIA strongly recommends that DOC only work with ‘controlling authorities’ on matters of flight safety – not adverse effects.
58. A prescriptive approach to airspace management has already been investigated in other national parks by DOC and discarded in favour of formal codes of practice and the development of strong working relationships with aircraft user groups. A range of noise mitigation measures are available to aircraft operators including changes of routes, altitudes and the addition of ‘quiet’ technology.
59. New Zealand’s weather and topography do not lend themselves to restrictions on airspace and it is likely that flight safety could be compromised by doing so.

Recommendation:

60. Point 2. page 248: Be removed in entirety or the wording changed to reflect flight safety as the objective of working with controlling authorities, not management of adverse effects.
61. Point 10. a) and b) page 250: As above.

9. A) b) c) / page 250

TIA strongly endorses the sentiments expressed within a/ and b/ but we believe that c) *“aircraft authorised to land within public conservation lands should not, under normal operating conditions, have acoustic profiles that significantly impinge on recreational opportunities...etc”* is very open to interpretation and

difficult to quantify. In practice it may prove confusing to both DOC and concessionaires.

Recommendation:

62. That a) and b) be retained.

63. That the wording in c) is changed to “*Aircraft authorized to land within public conservation lands shall work with the Department to establish routes and approach/departure profiles that minimise their effects on recreational opportunities and natural characteristic...etc*”

3.6.5.4 Camping / page 253

64. The tourism industry is putting significant efforts into the management of freedom camping. TIA encourages DOC to reassess the camping section and include more direction on their approach to this growing and concerning issue.

Recommendation:

65. DOC liaises with TIA and the Holiday Accommodation Parks New Zealand Association (HAPNZ) to discuss how DOC can give greater emphasis and guidance to the management of freedom camping within this CMS.

3.6.5 / 17 / Thrill Seeker Activities:

66. TIA supports Latitude Nelson’s submission and does not agree with the prescriptive approach taken by excluding ‘Thrill Seeker’ activities from public conservation lands as set out in section 3.6.5.17.

67. We believe that if an activity meets the objectives set out in Sections 3.5 and 3.6.2 that it should be considered under the concession process. We consider that some perceived Thrill Seeker activities could involve low impact recreational opportunities for people to engage with nature on nature’s terms, and would like to see consideration given to these activities rather than excluding them from future activities in the conservancy.

Recommendations:

68. TIA would like the CMS to clearly define the definition of a ‘Thrill Seeker’ activity in section 3.6.5.17.

69. We would like to see the following words in Policy 2 deleted: *Thrill Seeking activities are generally considered to be more suitable to areas located outside of public conservation lands*

Mountain biking on the Heaphy Track / page 359

70. TIA endorses Latitude Nelson's support for mountain bike access on the Heaphy Track. Key aspects of successfully allowing mountain biking in National Parks is the management and monitoring of the activity. Effective monitoring needs to be put in place to keep track of impacts on the natural environment and on the satisfaction levels of other users in the park in order to avoid any potential conflict. We fully support DOC in implementing these measures.
71. Mountain biking is an activity experiencing rapid growth in popularity in New Zealand and internationally. According to the Tourism Research Council of New Zealand, over 22,000 international visitors participated in off road cycling activities in New Zealand to the year ending March 2007. Allowing mountain biking to occur on public conservation lands at specified sites and in a well managed manner will encourage New Zealanders and international visitors to become active and to enjoy our wonderful natural environment.
72. In addition to regular monitoring of the environmental impacts of mountain biking we suggest that limits be set for the group size of mountain bikers. We suggest that mountain bike clubs, guided mountain bike concessionaires, national cycling associations and other key stakeholders be consulted to establish any limits on group size.
73. TIA also supports consideration being given to allowing guided mountain biking trips on the Heaphy Track through the granting of concessions. We feel that these operators, working under the conditions of a concession will be able to deliver a higher quality, higher yield product. We also consider that professional, commercially guided trips will be better managed and more able to minimise environmental and social impacts associated with the activity.
74. One of the key issues for tourism in New Zealand is the extreme seasonal nature of the sector. The Draft Nelson Tasman Regional Tourism Strategy recognises and identifies seasonality as an issue. One of the four goals of the strategy is to develop Nelson-Tasman's attractiveness as a year round destination, and in particular Strategy 1.3.11 identifies establishing managed mountain biking access on the Heaphy Track.
75. Permitting mountain biking activity in the Kahurangi National Park will help to attract shoulder season and off season visitors to the region, and as a result provide significant economic benefits to the local economy through accommodation providers, food services and retail, bike shops and other businesses. Recent research from British Columbia, Canada, Rotorua and from the Central Otago Rail Trail provides evidence of the economic benefits of mountain bike tourism to the local community.

Recommendations:

76. TIA endorses Latitude Nelson's submission that supports mountain biking on the Heaphy Track as long as the adverse effects on national park values are minimised, the track standard is suitable, and the benefit, use and enjoyment of other people are considered.
77. If in the future, mountain biking is permitted on the Heaphy Track, TIA would support limits placed on the maximum size of groups cycling on the track to help minimise impacts on other users.

Other

78. TIA thanks the Department for the opportunity to comment. TIA is interested in 'all things visitor related' within the draft CMS and wishes to reserve the right to talk to the Conservation Board on issues that we may have not alluded to directly within this submission.

Background Information on the Tourism Industry Association New Zealand (TIA)

1. The Tourism Industry Association New Zealand (TIA) advocates for the interests of the tourism industry in New Zealand. The businesses we represent generate more than 85% of New Zealand's tourism-related revenue.
2. Tourism is an \$18.6 billion industry (\$8.3b from international and \$10.3b from domestic tourism) with international tourist expenditure accounting for 19.2% of New Zealand's total export earnings.¹ The industry, directly and indirectly, employs 1 in 10 New Zealanders in a diverse range of businesses – the majority of which are small and medium sized enterprises. Not only is tourism important because of its size, representing 8.9% of New Zealand's GDP, it is:
 - Highly employment intensive;
 - Regionally disparate; and
 - Very diverse - ranging from large stock exchange listed companies to small cottage industries.
3. These businesses cover a range of tourism-related activities – hospitality, transport, adventure and activities, attractions and retail and related tourism services. In many cases, regional tourism businesses have developed around regional assets divested by other industries and has revitalized those assets and the communities that depend on them.
4. The tourism industry in New Zealand consists of more than 8,000 small and medium sized businesses. Of these businesses, most employ less than five people.
5. New Zealand welcomes more than two million overseas visitors to its shores every year. The domestic tourism industry is also important in helping to sustain a vibrant tourism industry. TIA estimates that over 75 million visitor nights are spent by New Zealanders every year.

¹ "Key Tourism Statistics – July 2007", Ministry of Tourism website