



**tourism**  
**INDUSTRY**  
ASSOCIATION NEW ZEALAND

**Mount Aspiring National Park**

**Draft Management Plan**

**30 June 2009**

## 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 Mount Aspiring National Park Draft Management Plan.
4. If you wish to contact us regarding this submission, in the first instance, please telephone Geoff Ensor, Advocacy Manager on 04 496 4889 or e-mail [geoff.ensor@tianza.org.nz](mailto:geoff.ensor@tianza.org.nz) or Simon Wallace, Policy Manager on 04 494 1842 or e-mail [simon.wallace@tianza.org.nz](mailto: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...”***

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 dependent 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 in 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. It is vital that the Department continues to work closely with the tourism sector to effectively manage visitor use. 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.

10. This submission on the Mount Aspiring National Park Draft Management Plan 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.

## **General Comment**

11. TIA wishes to acknowledge the consultation process undertaken by the Department. TIA facilitated two meetings between concessionaires and DOC (Wanaka and Queenstown) prior to the draft plan being written. TIA strongly supports a strong regime of pre-plan consultation and appreciated the department’s proactive approach to such a process.

We have become aware however that at least one key group, the New Zealand Mountain Guides Association, may not have been consulted. We hope the department will ensure the association’s views are fully considered during this submission process.

12. Document size. TIA understands the difficulties for the Department in creating a shortened version of the whole document, when the devil is in the detail. However, given the sheer size of the document, TIA will continue to advocate for a short ‘summary of structure’ which guides readers through the document and helps to clarify layout and linkages. The ‘objectives’ and ‘policies’ would be very valuable as a standalone document, given that they will dictate the department’s management over the ensuing 10 years.
13. 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 hundreds of visitors descending on national parks. Tourism is in fact both international visitors and New Zealanders travelling to, from and within New Zealand, seeking a range of different experiences and interacting with communities, each other and the environment.
14. The point TIA wishes to make strongly is that using ‘tourism’ in the context of this draft is misleading. Recreation is the same 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 the skill and knowledge of professional guides. Both options complement each

other and add value to outdoor recreation by offering experiential choice.

15. The department's recently released Statement of Intent (SOI), 2009 – 2012, reinforces the importance of commercial recreation to conservation, communities and New Zealand. The Minister's foreword provides clear direction as does section 3.5, excerpts of which are shown below:

### **Section 3.5**

#### **'Business opportunities consistent with conservation are enabled'**

##### ***What we are seeking to achieve and why?***

*Businesses and the Department will be able to operate together in ways that deliver environmental, social and economic benefits to New Zealanders. These benefits include the employment and revenue that flows into communities, and the revenue, carbon credits and branding benefits that businesses receive.*

*Additional environmental benefits include the contributions to conservation that come from resources generated by business opportunities and from wider recognition of the links between conservation and successful businesses and of the economic value that flows from conservation-based business. A wider range of people will have a stake in conservation.*

*Conservation management will benefit from the different ideas and initiatives likely to come from interactions with the commercial sector. Recreation concessions help to broaden the range of recreation opportunities available, and so help to meet the needs and preferences of a wider range of people.*

##### ***What we will do to achieve this?***

*Business opportunities are enabled through concessions and through business agreements.*

*This work will be supported by the commercial framework developed during 2008–2009 to support the Department's efforts to **foster** commercial activity consistent with conservation outcomes. The framework established overarching principles, and these are being used to identify where and how to maximise the value of business opportunities that already exist and of potential new opportunities'.*

TIA is concerned that the draft management plan has language and (in some cases) proposed limits, that are more synonymous with a philosophy of 'allowing' commercial recreation than 'enabling and fostering' it.

16. The plan proposes a very prescriptive approach to limits based on present usage, with little justification for the limits provided. It appears to take little account of seasonal fluctuations, the potential for greater demand over the next 10 years or the need for some flexibility.

## **Recommendations**

17. Any references to 'tourism' within the entire document are (where practical) replaced with the term 'commercial recreation' or 'commercially delivered recreation'.
18. The entire draft plan is revisited in light of the department's SOI – a document which gives clear direction on the need to enable and foster commercial activity consistent with conservation outcomes. We recommend that a revisit of the plan results in greater recognition of the ways in which commercial recreation can support conservation outcomes, this includes:
  - Contributing to the protection and enhancement of the environment
  - Education: Communicating appropriate information, behaviour, protocol, and conservation messages to visitors
  - Assisting with research and monitoring
  - Enabling a wide range of people irrespective of age or physical ability to enjoy the outdoors
  - Providing a pool of trained people for search and rescue
  - Contributing to the local and national economy
  - Offering recreational choice

All of these points show commercial recreation contributing to conservation in the broadest and truest sense of the word.

19. Limits for commercial activity are reassessed in light of the SOI, apparent lack of supporting data, peak versus off-peak demand and the need for responsiveness to changing demand over the life of the plan.

### **3.4.1 / The Park in the international, national and regional context / Page 24**

20. Paragraph 3 states that the park is considered by 'some as the 'home of the big tramping trip.' TIA is concerned that this is a subjective view which has already caused concern to many.

#### **Recommendation**

21. Paragraph three is removed because recreational opportunities are best described in 3.4 (Public benefit, use and enjoyment) and are less subjective.

### **5. Overall Park Outcomes / bullet points 10 and 11 / page 29**

22. Both outcomes read very negatively and do not sit well when viewed against the other 10 outcomes which are not conditional. The other outcomes remove the need to put conditions against visitors or concessions – such conditions are already implicit.

#### **Recommendation**

23. Bullet point 10 finishes after the word 'activities'.  
Bullet point 11 finishes after the word 'appreciation'

### **6.2.6 / Research and information / Policies / page 48**

24. It is critical that stakeholders are informed and when appropriate, involved in all stages of research and monitoring, including development of the methodology.
25. A degree of cynicism will exist if the methodology associated with research and monitoring is not understood and/or thought to be flawed. Such an approach threatens to undermine stakeholder support for the results and consequently DOC's management response.
26. As an example of collaboration, DOC and Environment Southland have 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**

27. That an additional policy is inserted, highlighting the importance of a collaborative approach to research and monitoring and giving guidance on how it will be achieved.

#### **6.5 / International agreements / Policy 1 / Page 55**

28. TIA believes policy 1 should be broadened to make it clear that user groups should also contribute to maintaining a coordinated approach.

#### **Recommendation**

29. Policy 1: We propose the following wording (underlined to show additions): *'Work with neighbouring conservancies, relevant local authorities and user groups to maintain a coordinated and consistent approach to management and servicing of visitors to Te Wahipounamu'*.

#### **6.6.2.2 / Remote Zone / Policies / 2, 3, 4 and 5 / page 61**

30. TIA supports the Park Zone concept aimed at maintaining a range of visitor settings, but believes the plan places too little emphasis on how to best manage any increase in demand without undermining the value of the place, and too much emphasis on setting rigid management criteria.

Specific details are dealt with later in our submission, but the department fails to tell a compelling story about why such severe limits are proposed. Policy 5 best exemplifies the department's current approach. TIA firmly disagrees with 5 and believes that all management options should be considered in the face of increased visitor use – very rarely is simple number-management enough, or even possible.

#### **Recommendation**

31. Policies relating to management of the remote zone are revisited and a more flexible management regime introduced that removes the sense that the zone is 'locked down' for the next 10 years. Nowhere is there evidence that the intrinsic values of the zone are under threat, perhaps more worryingly, remote zone use has been declining in many parts of New Zealand. Rigid criteria imposed for the life of the plan may be the easy management option, but it is also an extremely blunt instrument that may cause significant tension between park users and the department.

### **6.6.2.3 / Back country zone / Policies / page 62**

32. As for 30.

### **6.6.3.1 / Public facilities / Polices 4,5 and 9 / page 65**

33. Policy 4: TIA is at odds with the department's rigid policy on the provision of new or upgraded facilities which is *'unlikely in the remote zone, but may be considered in the back and front country zones'*. New or upgraded facilities should be assessed on a case by case basis, just as a whole range of management options should be considered in this way.
34. TIA does not agree with policy 5 that proposes no new Great Walks will be developed in the Park. The Great Walks are a New Zealand success story and if a new proposal is forthcoming it should not be turned down out of hand, but rather assessed against a range of criteria, including its impact on the values of the zones across which it passes and its recreational value.
35. Policy 9: this is of concern because it leads to the inescapable conclusion that with increasing hut visitation and a restrictive policy to building new huts or upgrading existing ones, there will be further restrictions on commercial use. Guided parties are the 'public' who have chosen to visit the park in a commercially delivered manner. The last sentence of 9 seems neither fair nor reasonable and will add to a sense of business uncertainty.

### **Recommendations**

36. New huts or upgrades to huts should be considered on a case by case basis against a range of criteria.
37. Policy 5: should be changed to not exclude the opportunity for a new Great Walk proposal which can be considered on its merits at that time.
38. Delete the last sentence of Policy 9.

### **6.6.3.2 / Private facilities / objective 2 / page 67**

39. TIA strongly objects to a proposed objective that rules out the opportunity for new concessionaire huts, the inference being that these would be exclusively used by concessionaire parties. We believe the

objective is too rigid and may be removing the opportunity for some strong public/private initiatives where the hut is available, at least for some periods, to other recreationists.

### **Recommendation**

40. Objective 2 is deleted or changed to reflect a case by case approach to hut applications.

### **Mountain Biking / Objective 3 / Page 69**

41. TIA is aware that mountain biking is being considered for the Heaphy Track and we question whether some seasonally managed mountain biking opportunities may exist in the park?

Mountain biking is an activity experiencing rapid growth in popularity in New Zealand and internationally. According to the Ministry of Tourism, 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 natural environment.

TIA also supports consideration being given to allowing guided mountain biking trips in the park 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.

### **Recommendation**

42. That the provision for mountain biking is reconsidered to explore the potential for 'off formed road' activity.

### **6.6.5 / Aircraft / pages 70 – 76**

43. We note in the first 6 bullet points, a distinction is made between recreation activities and tourism. As mentioned earlier in this submission, TIA believes recreation is recreation whether it is independently or commercially undertaken. 'Tourism' in the context of the park plan is a poorly defined and pejorative term.

44. The first paragraph on page 70 does not do justice to the benefits of aircraft, particularly when the remainder of the section tends to concentrate on limit setting and managing adverse effect.
45. Throughout the aircraft section and elsewhere through the document reference is made to working with the Civil Aviation Authority (CAA) to minimise the effect of over-flights, e.g. the second paragraph on page 113 relating to Bevan Col.

In regards to over-flights, TIA strongly recommends that DOC only work with controlling authorities i.e. the Civil Aviation Authority (CAA) on matters of flight safety – not adverse effects. 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. 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.

Ultimately it must be remembered that aircraft enable all people irrespective of age, health or physical ability the opportunity to enjoy New Zealand's most remote and rugged terrain.

46. Paragraph 3 on page 71 that starts '*during development of the draft, many indicated that a management priority should be retaining the opportunities to experience the solitude, remoteness and natural quiet... ..*' could also be balanced by the view that '*many indicated that a management priority should be retaining the opportunity to fly into remote areas and experience the solitude and natural quiet that have been diminished in some other natural areas.*' Well managed aircraft operations can facilitate access to remote places without damaging the intrinsic value of the place.
47. Policy 5: TIA is of the strong opinion that insufficient landing zones exist in the park, exacerbated by an over-restrictive approach to considering one-off permits.
48. Policy 6: We believe insufficient landing sites are available in the remote zone, particularly from Mount Aspiring south. From landing site 24 near Pearson Saddle, there appears to be only three aircraft landing sites to the south and only one in the remote zone at Bevan Col. Given the huge swath of country involved, and the proposal to not accept

case by case applications, this is a real concern and we believe hard to justify. We have a strong sense that much of the area south of Pearson Saddle is being locked up for the fit able-bodied community.

49. Landing sites at Bevan Col (I): Already addressed in 99 - 106 (below)
50. Policy 7: TIA is opposed to a 'roar only' landing period and sees no reason why some or all the sites should not be available throughout the year on a case by case basis for hunters or trampers, up to a daily limit.
51. Policy 8: Feedback from operators has indicated that 160 landings annually in the Forbes landing area is simply not enough and needs to be revisited.
52. Policy 13 (ii): TIA feels very strongly that the department is not acting in the best interests of the public by proposing such an inflexible approach to one-off landing permits in the remote zone. This is compounded by a very small number of authorized landing sites south of Pearson Saddle.
53. Policy 13 (iii): TIA feels very strongly that the department is not acting in the best interests of the public by proposing such an inflexible approach to one-off landing permits in the back and front country zones. This is compounded by a very small number of authorized landing sites south of Pearson saddle.
54. Policy 17: reject using CAA/airspace restriction in this way, see 45 above).

**Recommendations:**

55. The last bullet point at the top of page 70 is deleted.
56. Change the first paragraph on page 70 to read "*Aircraft activity assists the use and enjoyment of national parks by providing opportunities that would otherwise be unavailable. Aircraft enable all people, irrespective of age, health or physical ability the opportunity to enjoy New Zealand's most remote and spectacular terrain.*"
57. Any reference (throughout the plan) to working with CAA to help minimize the effects of over flights is deleted.
58. Any reference to the role of user groups and how the department may work with them to reduce the impact of noise on other park users is reinforced and explained more fully.

59. Third paragraph page 71: Consider deleting this paragraph as emotive and unbalanced, or add a portion that addresses the imbalance e.g. *'many indicated that a management priority should be retaining the opportunity to fly into remote areas to experience the solitude and natural quiet that have been diminished in some other natural areas.'*
60. With operators, DOC establishes some additional landing sites in the remote and backcountry zones, particularly south of Pearson Saddle.
61. The department relaxes its stance regarding one-off landing permits and in doing so provides flexibility over the life of the plan to counter changing demand, seasonality, changing patterns of use and weather issues.
62. All landing limits are reassessed to ensure they make operational and effects-based sense e.g. a maximum of 20 landings per year and 2 per day for the remote zone, could be changed to a daily limit only, backed by the ability to apply for one-off permits.
63. Landing limits at Bevan Col are reconsidered (see 99 - 106 below)
64. Roar landing sites are made available year-round for hunters and trampers.
65. The Forbes landing area limit of 160 landings is lifted in consultation with operators.

#### **Bolting and climbing aids / policy / pages 79 & 80**

66. Feedback provided from experienced mountaineers indicates that 'bolting and climbing aids' is an important safety related issue that needs further work with the ultimate aim of establishing a nationally consistent policy. The New Zealand Alpine Club (NZAC) has a set of national guidelines which appear to be well supported by the climbing fraternity and could form the basis for future discussions.

#### **Recommendation**

67. The importance of bolting and climbing aid policies to mountain safety should not be underestimated and TIA strongly urges the department engage with the climbing sector, using the NZAC guidelines as the basis for initial discussion.

#### **6.6.8 / Waste disposal / Page 81**

68. TIA supports the objectives and policies and wishes to note that while concessionaires adhere to their own strict principles of waste management in the outdoors, they are also the eyes and ears of the department and can positively influence the behaviour of other visitors to the park.

### **Recommendation**

69. Waste disposal objectives and proposals are retained and an additional policy is considered that promotes the concept of the department and concessionaires working together to influence the way all visitors manage waste disposal.

### **6.7.1 / Uses requiring authorisation / pages 83 - 87**

70. We note that a precautionary approach has been taken when setting proposed concessionaire limits in the wilderness, remote and backcountry zones (page 85). Our concern is that they may not be set correctly which is crucial given the life of the plan and department's current stance to one-off permits.

71. Objective 1: We are very concerned at the wording of the objective which starts with the words *'to allow the benefits of guided concession activities to be realised...'*; particularly in light of the departments SOI and the many benefits to conservation from well managed commercial activity

72. Policy 4: At least one operator has regularly had groups of up to 10 people (two guides and eight clients) in the remote zone; the proposal for group sizes of 7 is therefore of real concern. TIA feels the department needs to demonstrate that historic use was creating problems, before insisting on a group size of 7.

73. Policy 4: Similarly, while a total of 105 people per concessionaire per year meets current activity levels, it takes no account of potential growth. This is particularly worrying given that use of difficult and isolated alpine terrain by non-commercial recreationists has declined over the last 20 years – surely we want to encourage guiding which encourages people into the backcountry?

74. Policy 5: TIA is adamantly opposed to the proposal not to permit guiding concessions on the Dart/Rees track (including the route from the Dart Hut to Cascade Saddle). TIA struggles with exactly why DOC would not permit well managed commercial recreation of appropriate

scale and frequency? A decision to ban professional guides from the crossing could be viewed as irresponsible when measured against the value guides bring to the visitor experience, including greatly enhanced levels of safety for all visitors. Recreation or commercial recreation - it's all recreation and provides visitors to the park with choice.

75. Policy 6: TIA makes the same observations as in 72 and 73 above.
76. Policies 7 and 8: The wording of these policies makes it very clear that concession activity is regarded as the poor relation amongst park users. No thought seems to have been given to the impact of 'other visitors' on concessionaire groups i.e. it is all one way traffic with the words: monitoring, impacts, conflicts and limits dominating the policies. TIA is extremely concerned at the negativity and inference of these policies.
77. Policy 9: We are opposed to a policy that rules out a range of activities without allowing them to be assessed on a case by case basis. We consider that all the activities listed 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 park. The proposed policy appears to be an 'easy' management option and certainly not in line with either the SOI or 21<sup>st</sup> century thinking.
78. Policy 10: TIA supports management based on robust research and monitoring, but it is crucial that stakeholders are involved at every stage along the way. TIA believes that DOC should be far more proactive in engaging with a range of stakeholders as part of the research and monitoring process. A degree of cynicism will exist if the methodology associated with research/monitoring is not understood or thought to be flawed. Such an approach threatens to undermine the results and DOC's management response.
- A collaborative approach becomes even more important when concessionaires may be asked to contribute to the cost of all or part of the monitoring.
79. Policy 12: The TIA/DOC agreement on Limited Supply Allocation should guide allocation processes over the life of the plan.

## **Recommendations**

80. The objective is changed to indicate a more positive approach to concession activity e.g. "*To foster and enable guided concession*

*activities consistent with conservation outcomes, relevant legislation and the objectives and policy of this plan.”*

81. All proposed limits are reassessed with sector groups to ensure they reflect current use and take account of the potential for changing demand over the life of the plan.
82. Policy 5: Delete.
83. Policy 7 and 8: Re-word these policies so that the tenor becomes far less stifling and aggressive e.g. *“we will proactively accommodate a range of user groups, all of whom add value to the park, and ensure they can recreate together in a way that preserves their experience and the park’s intrinsic values.”*
84. Policy 9: delete.
85. Policy 10: Include a paragraph that signals the department’s intention to work with stakeholders through every stage of research and monitoring, including development.
86. Policy 12: Ensure reference is made to the Limited Supply Agreement between TIA and DOC.

### **6.7.3 / Commercial filming and photography / pages 88 and 89**

87. The film industry is important to New Zealand and the local communities that surround the park. The ability of the film industry to operate effectively is closely linked to issues of aircraft access and our comments under ‘aircraft’ should be read with this in mind.

#### **Recommendation**

88. The department continues to talk with the film industry about their needs and also assess aircraft provisions with the needs of the film industry in mind.

### **7 East and West Matukituki Valleys / Policy / page 98 and 99**

89. Policy 2: TIA questions whether the figure of 7500 clients per year reflects current use with a reasonable margin for growth?
90. Policy 6: The language used to describe the Cascade Saddle Track adds weight to our argument that guiding should be permitted.

#### **Recommendation**

91. The proposed limits are reassessed with sector groups to ensure they reflect current use and take account of the potential for changing demand over the life of the plan.

92. Guiding is permitted on the Cascade Saddle Track.

### **9 Dart and Rees Valleys / Objectives and Policy / Pages 108 and 109**

93. Objective 4: Strongly object. See 74 above.

94. Objective 5: This policy indicates that concessionaire activity is a threat to natural quiet. TIA believes that small, well managed guided groups are far less of a threat to natural quiet than large, uncontrolled and sometimes inexperienced groups. The reality is that 'people' threaten natural quiet and no distinction should be made between independent and guided groups, except that one may be better managed. The focus should be on managing a diverse group of users in a way that preserves the value of a place, not on targeting concessionaires as a 'problem' sector.

95. Policy 4: TIA is concerned that any further increases to current hut size will be an unlikely response to increased use. As mentioned previously, we believe a range of management responses should be considered in light of changing use patterns.

### **Recommendations**

96. Objective 4: delete.

97. Objective 5: delete or remove the words 'existing concessionaire' and 'other' from the sentence.

98. Policy 4: Delete the last sentence.

### **10 Mount Aspiring Climbing Region / policies / Pages 113 and 114**

99. Policy 1: Two options (1a and 1b) have been put forward by the department. TIA accepts neither and believes the status quo should also be an option. A survey completed by DOC in 2006/07 clearly stated that the actual park users did not feel adverse effects from helicopter landings at Bevan Col. The majority also felt that restricting the number of landings per day was not the way to handle the matter. In fact the actual park users could see no reason to change the status quo because they felt there was not a significant problem.

100. In regards to 1a we make the following observations:

110 landings per year and 4 landings per day are both too limiting and too inflexible. The average landings per year since the 1996/97 season have been 109 – clearly a proposed limit of 110 leaves absolutely no margin for growth. This restrictive limit flies in the face of evidence that shows significantly more landings could be permitted before unacceptable levels are reached.

The logic of a daily limit *and* an annual limit are lost on us. What will the annual limit mean in terms of ‘on the ground effects?’ If there must be limits (which we dispute given the success of the current case by case regime) then simple ‘cause and effect’ logic would point towards a daily limit which has direct relevance in terms of effects on other users.

The current daily limit is too low and does not reflect operational reality. Weather and seasonality are just two of the factors that will make 4 landings per day unworkable and the cause of significant tension.

101. In regard to 1b we make the following observations:

We believe an aircraft exclusion period is a flawed concept because of the impact weather will have on such a prescriptive approach, the tension it is likely to create within the climbing fraternity and between DOC and operators, the economic impact on concessionaires – and because it is not backed by strong research.

The economic impact of aircraft exclusion periods cannot be ignored. While TIA supports long term environmental sustainability, which may involve reasonable limits, aircraft exclusion periods will threaten the viability of many concessionaires who already suffer from a short climbing season and highly unpredictable weather. Sustainability must be considered in its broadest sense.

The introduction of aircraft exclusion periods for Bevan Col will have a negative impact on the experience of New Zealand and overseas climbers. New Zealand’s reputation for offering a wide range of commercial and non-commercial recreational opportunities will be threatened and the visitor industry will be the poorer as a result.

When the Mt Aspiring National Park was established in 1964, it covered 200,000 ha. Subsequently it has grown to be New Zealand’s third largest park at just over 355,000 ha. While not questioning the need for careful management and in some cases limits, we do believe that the sheer size of the park means it can accommodate a wide

range of activities and user groups without the need to explore aircraft exclusion periods.

102. A second landing option in the vicinity of Bevan Col should be investigated to assist when poor lighting, fickle winds or cloud make the exact site difficult or unsafe to use.
103. Policy 4: TIA believes this limit is unnecessary and difficult to justify.
104. Policy 5: Strongly supported.
105. Policy 6: Strongly object – huts, structures and camping sites should be considered on a case by case basis.
106. Policy 7: See 66 and 67 above.

### **Recommendations**

107. Neither 1a nor 1b are selected. TIA asks the department to consider
  - a/ the status quo for operations onto Bevan Col (preferred option)
  - b/ a daily limit in excess of 4 landings per day (exact figure to be established after further discussions with the climbing sector) and no annual limit.
108. DOC works with the flight and climbing sectors to establish a second landing option close to Bevan Col, for use when the Col itself is unsafe.
109. Policy 4: Delete.
110. Policy 5: support.
111. Policy 6: delete.
112. Policy 7: See 67 above.

### **12 Olivine Wilderness Area / Policies / page 121**

113. Policy 1: TIA notes that two options have been put forward for comment 1a and 1b. Neither is acceptable.

114. 1a: TIA totally supports concession activities in all wilderness areas and therefore is at odds with this proposal. Our view is encapsulated in our comments relating to the department's proposal to ban guiding on the Cascade Saddle Track.

TIA believes national consistency on concessionaire access to wilderness areas is required and if group size and frequency are closely managed, our Association is adamant that wilderness areas should not exclude commercial recreation. In essence, TIA does not see a small guided trip having any more impact on a place's values than an unguided party – and potentially less so.

TIA understands the West Coast CMS and the Fiordland National Park MP both allow guiding in wilderness areas.

115. 1b: TIA supports the department's intent to authorise concession activities, but from mountaineer advice believes party size should be lifted to a maximum of 6 clients and one guide. In no way do we feel that group sizes of this dimension will undermine the values of the zone.

### **Recommendations**

116. Concession activities are permitted in the wilderness areas
117. Proposed group size is increased to 6 clients and one guide.

### **Other**

118. TIA thanks the Department for the opportunity to comment. The Association is interested in 'all things visitor related' within the draft plan 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)**

119. 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.
120. Tourism is an \$20.1 billion industry (\$8.8b from international and \$11.3b from domestic tourism) with international tourist expenditure

accounting for 18.3% of New Zealand's total export earnings.<sup>1</sup> 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 9.2% 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.

121. 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.

122. 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.

123. 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.

---

<sup>1</sup> "Key Tourism Statistics – December 2008, Ministry of Tourism website