

Tourism Industry Association New Zealand (TIA)

Key Concerns on the Department of Conservation (DOC) Milford Sound Aircraft Access Proposals

1. DOC is proposing restrictions based on flawed research

- DOC is proposing strict and prescriptive limits that are not backed-up by robust research or other sound evidence. **DOC is not able to prove through comprehensive visitor satisfaction surveys that the restrictions proposed on aircraft movements are necessary. These restrictions will unreasonably jeopardise the livelihoods of tourist flight operators in the area.**
- The acoustic research methodology used by DOC to justify prescribed levels is flawed in that it fails to take into account such factors as weather and atmospheric conditions, and pilot behaviour (and technique). This is a major technical omission as these factors have a major influence on how noisy aircraft are. **This omission sharply reduces the reliability of the acoustic research that DOC has based its proposals on, and brings into question DOC's proposed restrictions on aircraft activity.**
- DOC uses noise issues to manage congestion. There appears to be no research to back up previous claims that the Milford Sound air space is congested. **Acoustic research cannot be used to justify proposals that attempt to manage congestion.**
- DOC proposes to restrict aircraft movements to 48 movements per day. Given the flaws in the acoustic methodology used by DOC, **such prescriptive restrictions are not necessarily justified by technical research.**
- **No indication of the impact of these restrictions on visitors to the area has been provided by DOC** – ie. how many visitors to Milford Sound will now not be able to fly into this internationally renowned tourist icon each day and will not bother to make the journey by road? Or how many will now do a round trip from Queenstown by air flying simply over Milford Sound rather than actually landing?

2. DOC has failed to honour process commitments to aircraft operators

- An important step has been left out of the consultation process with operators. The flight operators involved in the noise research with the acoustic consultant participated on the understanding that the acoustic consultant would discuss

his findings before they were used to develop Plan proposals. However this did not occur and operators did not get an opportunity to ‘peer review’ and to check that the conclusions from this report were fair and robust. **This raises questions as to whether DOC is serious about involving the tourism industry in planning decision making.**

3. The best opportunity for a ‘win-win’ outcome is to negotiate an Aircraft Operators’ Code of Practice for Milford Sound as has been successfully negotiated elsewhere

TIA has consistently urged DOC to work with operators to develop an aircraft users’ Code of Practice for the Milford Sound area, similar to the one that is successfully used in the Mount Cook and Westland National Parks. The Code of Practice contained in the Mount Cook and Westland National Parks Aircraft Users Group Handbook provides agreed operating practices that minimise noise and aim to promote a culture of awareness about the negative aesthetic impacts that aircraft access can have. **We wonder why DOC has decided against taking this approach in Milford?**

While working towards a Code of Practice would have been time consuming, it would have enabled DOC and flight operators to work through the issues together to ensure high levels of visitor satisfaction and ongoing business viability at the same time. In particular, it would have allowed the operators to take some ownership of the issues and their response to them – and thereby achieved buy in making it easier for DOC to achieve its objectives to maximise the quality of the environment at Milford Sound.

Instead, DOC appears to have relied on its own judgment combined with questionable research to impose activity levels on businesses. We expect these levels to jeopardise the viability of some flight operator businesses.

TIA calls on DOC to:

- modify the current proposals to restrict aircraft activity in Milford Sound area
- undertake to work with aircraft operators operating at the Milford Sound airport to develop a Code of Practice for aircraft operators along the lines of the one contained in the Mount Cook and Westland National Parks Aircraft Users Group Handbook
- work with the industry to commission the robust research that an issue of this importance to the economy of Fiordland and the livelihood of a number of loyal concessionaires deserves.

