



Whanganui National Park Draft Management Plan – Submission

29 September 2006

Executive Summary

1. This submission by the Tourism Industry Association New Zealand (TIA) comments on the Whanganui National Park (the Park) Draft Management Plan (the Plan) of July 2006. A meeting facilitated by TIA and the Department of Conservation (the Department) was held on 14 September 2006 with TIA members who hold concessions and operate tourism businesses in and around the Park.
2. TIA endorses the long term outcomes of this plan relating to:
 - a) preservation of the Park in its natural state;
 - b) preservation of the Park's indigenous species;
 - c) preservation of the Park's natural and historic heritage, in particular the co-operative relationships between the Department, Tangata Whenua and the wider community; and
 - d) the Park being able to be experienced by a variety of users with a high standard of facilities;
3. TIA notes that the objectives and proposals are consistent with legislative requirements, notably the National Parks Act 1980, the General Policy for National Parks 2005 and the Whanganui Conservancy Conservation Management Strategy.
4. TIA welcomes the opportunity to appear at a future hearing in support of this submission. Attached as Appendix 1 are details about our organisation and who we represent. If you wish to contact us regarding this submission in the first instance, please telephone Geoff Ensor, Sector Manager on 04 496 4889 or e-mail geoff.ensor@tiaz.org.nz or Simon Wallace, Policy Manager on 04 494 1842 or e-mail simon.wallace@tiaz.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...”¹

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

¹ General Policy for National Parks, New Zealand Conservation Authority, April 2005, p.7.

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 Whanganui 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.
11. Our association believes the linkage provided between Regional Tourism Organisations (RTO), the Department, operators and national tourism organisations is vital and should exist permanently, not only during management plan development. For example, such a linkage was apparent during the consultation phase of the Draft Abel Tasman National Park Management Plan when the local RTO, Latitude Nelson, actively assisted and advocated for a strongly consultative approach. TIA will be encouraging other RTOs to communicate to the Department nationally and at Conservancy level, the benefits of strong, ongoing Tourism/Conservation relationships.

Analysis

12. TIA has the following comments with regard to specific clauses in the Park's Draft Management Plan.

The specific part of the plan that our comments relate to are:

1. Overview

1.4 Key Relationships (p.14)

Our comment is:

13. We support the Department in the on-going development of key relationships and collaborative management approach to the Park plan. TIA does not believe a strongly hierarchical management structure is in the best interests of the Park. Dangers also exist from consulting with individuals or groups in isolation – a practice likely to lead to widespread conflict and misinformation.
14. Diversity of use will be most effectively managed if challenges and issues are jointly understood (by all) and decisions are made cooperatively within a spirit of shared Kiatiakitanga/guardianship.

On clause 1.4, we seek the following decision:

That this section remains and be given priority by the Department during the life of the plan and beyond.

4. Management of Recreational Opportunities (p.53)

4.1.1 Tourism forecasts (p.55)

Our comment is:

15. The Tourism Research Council (TRC) forecasts used appear to date back to 2003. We believe the Plan would benefit by using or publishing data that is more up to date.

On clause 4.1.1. we seek the following decision:

That the Department engages with the Ministry of Tourism (TMT) to ensure the Plan reflects the most recent visitor forecasts. It should be noted the TRC has now been absorbed into TMT – it is no longer a stand-alone Council.

4.1.2 The Whanganui River experience (p.56)

Our comment is:

Capacity issues (p.57)

16. At the meeting of tourism operators and concessionaires held in Whanganui, there was significant concern expressed over congestion at the Mangapurua landing resulting in safety concerns between jet boats and non-powered vessels docking at the site. The Plan appears to make no reference to this issue, yet the need to find a solution was noted as a priority by those operators attending the meeting. In the interests of safety and as well as to reduce tension between users, a suggestion was made at the meeting to develop an extra tie-up site for jet boats at the mouth of the Mangapurua Stream as well as the establishment of an alternative track from there which picks up the main track. There has been a track that has been used informally for many years by operators and recreational users and there are some areas of this track which would need to be made safer.

On clause 4.1.2. (Capacity issues) we seek the following decision:

That the Plan recognise the need to address the issue of congestion at the Mangapurua landing as a priority and intended action is recorded under Policies on pages 61-62 of this section.

Use of the Whanganui River (p.60)

Our comment is:

17. Our Association supports and shares the Department's belief that the development of a shared vision together with integrated management of the Park and river will deliver the best outcome for all concerned. TIA's experience in other National Parks has convinced us that strong User Group/Department partnerships are more effective in mitigating negative impacts on the environment and improving safety than any legislative mechanism. Safety and environmental consciences tend to grow from shared responsibility resulting in a positive culture where peer pressure achieves compliance.

On clause 4.1.2 (Use of the Whanganui River) we seek the following decision:

That due to current concessionaires communicating well, the Department continues the development of strong relationships with User Groups, in preference to a legislative response that could be promoted by other agencies in the future.

Policies (p.61)

Our comment is:

18. Point ii) implies that at peak times some campgrounds may be reaching capacity. We support the Department's intent to monitor visitor use and determine trends, however, TIA believes the issue of potential overcrowding needs to be addressed before it arises, in order to protect the visitor experience, preserve the environment and ensure safety in the Park.
19. Point vi) shows a clear intent by the Department to seek agreement on future responses to growth. TIA believes managing growth in the Park should be a high priority for the Department and that urgent discussion is needed with tourism and recreation interests aimed at effectively managing this growth.
20. A consultation process facilitated by TIA in conjunction with the Department is currently under way that will result in national guidelines for issuing concessions when demand for an opportunity exceeds supply e.g. when capacity for a site or area has been reached but additional concessionaires wish to apply. While it is too early to predict the outcome of this consultation phase, it is becoming clear that strong arguments exist for recognising the rights of incumbent operators who are committed to the area and community. This is also a fair and reasonable approach and we urge the Whanganui Conservancy to await the outcome of the national discussions on this very important issue.

On clause 4.1.2 (Policies) we seek the following decision:

That current point vi) become i);

That the wording in the first line of ii) be changed to read "to pre-empt significant overcrowding issues at hut and camp sites, the Department will consider..."

That should the Department face a situation where demand for concessions exceeds supply, no decision is made on the allocation mechanism until the results of national consultation and policy development is complete.

5. Other Activities and Uses

5.1 Other Activities and Uses with Potential Effects on the Park (p.87)

Our comment is:

21. Our Members support a greater emphasis on appropriate signage to enhance the visitor experience and to provide additional safety information, especially at the park's entry points.

On clause 5.1 (General issues) we seek the following decision:

That the Department clearly documents its intent to work collaboratively with the local community and User Groups to enhance the current signage within the Park.

22. A reliable and comprehensive communication network within the Park would greatly enhance the day to day operational safety margins, especially given the increasing visitor forecast.

On clause 5.1 (General issues) we seek the following decision:

That the Department commits in the Plan to working more collaboratively with operators and develops a communication strategy for the Park.

Recommendations

1. TIA recommends the Department adopt the decisions as noted above and repeated below:

- a. Key relationships - that this section remains and be given priority by the Department during the life of the plan and beyond.
- b. Tourism forecasts - that the Department engage with the Ministry of Tourism (TMT) to ensure the Plan reflects the most recent forecasts.
- c. The Whanganui River:
 - i. that the Plan recognises the need to resource and manage congestion at the Mangapurua landing as a priority;
 - ii that due to current concessionaries communicating well, the Department continues the development of strong relationships with User Groups, in preference to a legislative response;
 - iii. that policy priorities are re-ordered and priority be given now by the Department to managing visitor growth in the Park; and
 - iv. that no decisions are made on a concession allocation mechanism until the results of national consultation and policy development is complete.
- d. General issues:
 - i. that the Department clearly document its intent to work with the community and User Groups to enhance current signage; and
 - ii. that the Department commits in the Plan to work more collaboratively with operators and develop a communication strategy for commercial and independent users of the Park.

2. TIA asks the Department to note the environmental practices of its concessionaires and the responsible way in which managed visitors use public conservation lands.

Appendix 1

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 a \$17.5 billion industry (\$8.4b from international and \$9.1 from domestic tourism) with international tourist expenditure accounting for 18.7% of New Zealand's total export earnings.² 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 9.4% 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 have revitalised 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.

*Tourism Industry Association New Zealand (TIA)
September 2006*

² "Key Tourism Statistics – September 2006", Ministry of Tourism website