



Tourism Industry Association New Zealand

**Comments on the
Department of Conservation
Draft General Conservation Policy**

December 2003

About Our Association and Industry

The Tourism Industry Association New Zealand (TIANZ) represents the interests of over 3,500 businesses in the tourism industry.

Tourism is a \$15 billion industry and generates 14.3% of New Zealand's exports. The tourism industry 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. It is also:

- Highly employment intensive;
- Regionally dispersed;
- Has the flexibility to change its target markets quickly as conditions change;
- Can offer a good return on investment.

The tourism industry in New Zealand consists of more than 15,000 small and medium sized businesses. Of these businesses, most employ less than five people.

New Zealand welcomes almost two million overseas visitors to its shores every year. The domestic tourism industry is also important in helping to sustain a vibrant tourism industry. TIANZ estimates that over 75 million visitor nights are spent by New Zealanders every year.

This document contains the following sections:

- Some overview comments on the tourism industry and its relationship with the natural environment.
- Statement of the significant issues relating to the management of the environment on which our tourism industry is based.
- TIANZ principles that should form the basis for good public policy for the management of our natural environment, in a way that balances use with conservation.
- Concluding remarks.

Sustainable tourism's role in conserving our environment

Tourism provides considerable benefits to the overall environment in New Zealand (economic, social, cultural, environmental). Tourism is:

- a key driver for national and local economic development.

- The environment/scenery is a key drawcard for visitors and is fundamental to the New Zealand “100% Pure” brand, which underpins New Zealand’s Gross Domestic product, either directly or indirectly.
- the catalyst for the development of public amenities, infrastructure and public spaces enjoyed by the community, throughout the country.
- the industry that is most compatible with, and intrinsically linked to the management of Public lands.
- An industry that contributes to New Zealand through: corporate taxes, Goods and Services Tax (the only ‘export’ industry to do so), concession fees, by providing opportunities for domestic and international visitors to learn more about the natural environment.

However, TIANZ believes that historically there has been a reluctance within the Department of Conservation (DOC) to accept that DOC-managed lands are natural visitor attractions in their own right and the basis of many tourism businesses. This has led to the perpetuation of policies that have sought to preserve DOC-managed lands, rather than managing the balance between use and conservation.

TIANZ principles for balanced conservation management

TIANZ upholds the following principles for conservation management in New Zealand:

- The tourism industry supports conservation policies that enable economic development while sustaining the broader environment tourism businesses operate within.
- Conservation legislation must be interpreted and applied in a way that leads to the achievement of a mutual relationship between use and conservation. The tourism industry supports tourism growth within the framework of the Limits of Acceptable Change model.¹
- TIANZ acknowledges the Department of Conservation as a key player within the New Zealand tourism industry, given its responsibilities for managing Public Lands, which are among the country’s leading visitor attraction areas. DOC also needs to acknowledge itself as a key player in the visitor industry.
- To justify the conservation of the lands managed by DOC, these lands must provide an economic or social return to New Zealand. This is necessary to ensure they are able to be managed in a way that is consistent with the values New Zealanders place on these lands, and to provide the resources that enable appropriate planning and management

¹ See appendix for further information on this model.

to take place. TIANZ recognises that a fair rate should be paid by concession holders for the use they make of public lands to conduct private business activities, and that controls are needed on private business activity on DOC lands to ensure sustainable management.

- We support ongoing review of the Department of Conservation's research priorities and capabilities to enable future decisions to be made based on an understanding of the effects of decisions, as opposed to a reliance on a subjective approach that is not founded on effective empirical data and monitoring.
- The Department of Conservation, as well as the industry, has a key role in helping to ensure visitors have a quality experience when visiting lands managed by the Department. Consideration should be given to encouraging concession holders to meet accepted industry quality standards. This requirement is becoming standard practice in similar countries overseas, including Australia, Canada and the United States.
- We support an emphasis on nationally consistent conservation management policies and standard operating procedures, with some flexibility for justified local variations. Such policies and procedures should be objective, transparent and should result in a minimum of transaction costs to both the Department of Conservation and concession operators.
- Different users of the lands managed by DOC must be acknowledged by the Department of Conservation. Management policies must always take into account the level of effects imposed by each user group on the environment, and the nature of the benefits they receive from their use.

TIANZ welcomes the opportunity to comment on conservation policy as it evolves and bases its input on these principles.

General statement for TIANZ and conservation management

In general, TIANZ welcomes the development of these general policies as a way of generating a policy application approach within DOC that is nationally consistent, transparent and based on sound principles.

At the same time, TIANZ is seeking acknowledgement within the document that the lands, waters and parks managed by DOC are an integral part of the visitor industry, and that DOC itself is involved in the tourism industry. DOC's role in the industry is demonstrated by Department of Conservation figures (as at December 2003) that indicates that almost 90% of visits to national parks, forest parks, heritage areas and reserves were from short stop² (for up to an hour) or day visitors³ (from one hour to one day).

² Based on DOC figures, sites visited are usually beside main tourist highways and activities undertaken include passive activities such as picnicking, sightseeing, through to mildly active pursuits such as short walks.

³ Based on DOC figures, these visits can be in a wide range of settings including urban fringe to backcountry areas and can include walking, picnicking and other passive activities.

TIANZ believes this draft general policy conveys an acceptance of the existence of the visitor industry. However, it does not explicitly acknowledge the majority of users, and the activities they undertake on DOC lands. It also does not acknowledge the benefits to New Zealand and the environment of having tourism businesses operating in natural areas (these benefits are discussed on pp. 1-2 of this submission.)

Further detailed concerns include:

- That DOC plays a strong role in the visitor industry but does not see itself as having this role. DOC's reluctance to fully acknowledge tourism makes it difficult for it to focus on effective environmental management in popular areas, and to dedicate resources to undertake the long-term planning required to ensure the impact of visitors is minimised on DOC lands. Feedback from TIANZ members suggests that in many conservancies tourism growth is often underestimated and this leads to reactive management regimes. The tourism industry is growing rapidly and TIANZ believes it is important for DOC to recognise this and to work with the industry to manage and provide for growth, rather than ignore or react to it. Barriers put up by DOC to growth should be justified by robust planning and environmental criteria and where possible signalled to operators well in advance.
- That, in general, DOC shows an overt bias in favour of recreational users, and against tourists. Further to this, we detect an ongoing tension between the concepts of DOC's mandate to "foster recreation and allow tourism", (which is often drawn upon by recreational user groups in their own advocacy), and the tourism industry. In reality, all users whether they are recreational or tourists are visitors to the DOC estate and should be treated evenly and objectively rather than moral judgements being made (which flow through to DOC's policy decisions) as to which visitors are better for the environment, or should have priority over others.
- There appears to be little recognition by DOC that some areas need to be managed for high use, and that such areas provide different experiences. All visits to DOC lands are equally valid and should be accommodated within a framework of sound management practices. Addressing problems in high-use areas requires flexibility, creativity and a willingness to engage with and involve a wide range of stakeholders. The development of sensible planning options for high-use areas will also provide additional tools that can be used for the protection of more remote parts of the DOC estate. TIANZ believes that further cultural shifts within DOC's thinking and operations are required to undertake sound environmental planning in high-use areas.
- The level and quality of ongoing dialogue between the tourism industry and DOC varies considerably between conservancies. In some areas, tourism operators and DOC staff have positive relationships. In other areas, relationships between the Department and tourism operators are less developed. There are currently limited opportunities for direct engagement between the tourism industry and DOC on issues of conservation policy and management. In general, these opportunities are restricted to making submissions on plans as they become available in draft form, or making direct approaches to DOC staff. TIANZ believes there is a consultation and engagement 'vacuum' which urgently needs to be filled.

TIANZ believes that the production of this General Policy document provides an opportunity to resolve these issues, which would have positive spin-offs for the management of our natural areas.

Acknowledging that tourism is growing and here to stay

We believe that acknowledgement of our industry in this way is consistent with the key considerations that DOC has identified as being instrumental in ensuring integrated conservation management, including:

Integration between different conservation values and priorities in a specific place or area (e.g historic conservation values, natural heritage values, and recreational opportunity values), while taking into account the different values held by stakeholders (e.g the economic well-being of local communities or cultural values of local iwi.)

This statement suggests that integrated management must necessarily involve a balance between such issues as the economic development of local communities, through industries such as tourism, and the careful management of our natural environment.

A further significant issue concerning TIANZ is the acknowledgement of the ongoing role that key stakeholders (including relevant industries such as ours) have in helping DOC apply, refine and monitor the effectiveness of the general policies that are developed. TIANZ has suggestions for amendments that would strengthen stakeholder involvement once the final policy is being applied, and useful mechanisms that might be put in place to achieve this.

This next section provides comments on specific areas of content that concern our industry.

More specific comments

Public Participation in Conservation Management

The document mentions that there are a range of specific stakeholders with a particular interest in participating in conservation management, including the national community as a whole. TIANZ believes that a glaring omission from this list of stakeholders is the visitor industry itself. The activities of tourism businesses on the conservation estate provide significant community development benefits to New Zealand as well as an opportunity for visitors to access the conservation estates.

We recommend that the visitor industry, and representatives of the tourism industry be acknowledged in the document, and in the proposed policies.

Further to this, we believe the policies proposed for stakeholder involvement are too vague, and would give DOC too much discretion to select stakeholders, and the mechanisms that would be used in stakeholder input. We are also concerned that the policies do not set out an active mechanism to enable stakeholders to have ongoing formal input to the application of this draft policy.

We recommend the following changes to the draft policies:

3(a): Delete “Appropriate forms of”.

3(b) Add after “organisations” the phrase “recreational and tourism organisations”.

3(c) add “industry representatives” at the end of the sentence. This recognises that some stakeholders are represented by an industry organisation.

3(d) Delete current sentence and replace it with: “strong working relationships will be maintained with all users, including tourism businesses at the local level, consistent with the principles of this General Policy.”

3 (e) add “and all interested stakeholders” after “the public”.

A new 3 (h): “DOC will apply the necessary resources at a national and regional level to build and develop positive working relationships with key DOC stakeholders on an ongoing basis.”

We have no other comments on the other policies in this section.

Conservation of Natural Resources

This section raises the following issues for TIANZ:

- The need for policies that recognise the balance between use and conservation of our natural environment.
- That tourism businesses operating on conservation lands continue to play a strong role in educating the public (including visitors) on conservation issues, including interpretation and the promotion of conservation values. They do this by providing an opportunity for easy access to conservation lands, and by passing on knowledge through the use of guides, interpretative facilities and literature supplies to visitors.
- The need for conservation management by DOC to be based on sound data and robust research, and the principles of the Limits of Acceptable Change model.
- The need for all users to have the opportunity to engage in ongoing dialogue with DOC on the fair and effective application of the General Policies.

We recommend the following changes to the draft policies:

4.1(c) the word “compromise” should be replaced with “negatively impact”, to reflect the importance of balance between use and conservation, and to make the policy more specific.

4.2 (c) A new second sentence should be added as follows: “Tourism businesses should be encouraged to continue to play a role in raising public awareness of the importance of conserving ecosystems.”

4.3.1 (g) Remove the word “relevant”, and insert “given the opportunity to”, so that it reads “Communities of interest should be given the opportunity to be involved”. This would reflect the importance of self-identification as a “community of interest”.

4.3.2 (g) This should include a reference to biosecurity from a border control perspective. It is clear that New Zealanders returning home are amongst the worst offenders in bringing into the country items that could have damaging effects on our environment.

4.3.4 (d) insert “research shows” after “leases)” so that it reads “concessions should not be granted (including grazing licences and leases) where research shows they are likely”. This creates a policy that reinforces the importance of basing the granting of concessions on sound information.

4.4.1. (i) Industry representatives should also be included in the list of stakeholders here.

4.4.2 (e) insert after “identified” the following: “in association with key stakeholders, including industry groups”, to reflect the importance of DOC working closely with all users on this.

5.1 (d) This should be amended so that the tourism industry is acknowledged as playing a useful role in raising this public awareness.

Cultural and Historic Heritage Conservation

This section raises the following issues for TIANZ:

- Policies should reflect that cultural tourism and heritage tourism are important areas of tourism activity. Such activity enhances visitors’ (and the general public’s) general appreciation and knowledge of cultural and historic areas of the country. Tourism businesses involved in this area can also serve as a catalyst for the enhancement and preservation of cultural and historic sites.

We recommend that following changes to the draft policies:

- 5.1 (d) This policy should be amended so that it makes reference to the tourism industry as having a role in raising this public awareness.
- 5.5 (a) This policy should be amended so that it makes reference to the tourism industry as having a role here.

Protected Area Network

We have no specific comments on this section.

Conservation Beyond Public Conservation Lands and Waters

This section raises the following issues for TIANZ:

- The need for DOC to establish and maintain effective and useful relationships with the tourism industry as a way of assisting the Department to protect ecosystems and habitats.
- The need for specific mechanisms to be established to enable ongoing formal input to the application of policies that protect ecosystems and habitats.

TIANZ suggests the following amendments:

7 (a) Industry representatives (including tourism representatives) should be included as stakeholders that DOC should place some priority on building positive relationships with.

This policy should also be amended to include provision for a formal stakeholder body to be established to provide ongoing policy input, including the application of policies. The body should meet regularly and a record should be kept of all discussions and deliberations that take place, and circulated to key DOC staff. This group would exist in addition to the Conservation Authority and Conservation Boards.

Natural Hazards

TIANZ is supportive of the contents of this section.

Visitor Benefit, Use and Enjoyment

As well as being a significant user of New Zealand's natural and physical resources, the tourism industry directly benefits from a high level of environmental quality. Unsustainable or damaging behaviour to our environment has the potential to destroy parts of our industry.

We also recognise that conservation of our ecosystems and biodiversity is essential to the future of all New Zealanders.

Tourism can play a role in helping to conserve the environment, through initiatives such as undertaking research and development into sustainable environments. Many tourism businesses also participate in voluntary initiatives that promote environmentally friendly tourism business practices. They also help provide and develop facilities and services that raise public awareness of the issues affecting the environment, giving exposure to issues that would otherwise remain unexposed.

In a nutshell, the environment sustains tourism and tourism must ensure that it helps sustain the environment.

Overall, TIANZ supports sound natural resource management policies that manage and minimise risks to New Zealand's environment while maximising the prosperity and well-being of all New Zealanders.

The proposed policies raise the following concerns for TIANZ:

- That the tourism industry is still not being sufficiently recognised by DOC for the benefits it provides to local communities, including those in areas adjacent to conservation lands. Tourism is also not being acknowledged as having a positive role to play in helping to sustain the environment.
- The importance of balance between use and conservation being reflected in policies.
- The importance of conservation management policies being applied in a nationally consistent way, while recognising particular regional issues and problems.
- The need for research, policies and management approaches that reflect the high-use of some areas by a range of visitors with differing values and interests.

- That visitor accommodation and services (other than concessionaire activities) should also be constructed having regard to reasonable demand for these services. TIANZ supports the application of user-charges to pay for the use of such services.

TIANZ suggests the following amendments:

9.1 (b) (vi) Delete “compromise to” and insert in its place the following: “adverse effects based on”. This amendment would make this policy more balanced, recognising that access will always involve some compromise to the environment.

9.1 (d) Add at the end of the sentence: “Concessionaires will also be encouraged to meet any relevant quality industry standards.”

9.1 (e) We suggest an extra sentence be included at the end of this paragraph as follows: “At the same time, the risks of undertaking recreational and visitor activities (if any) will be made known to visitors through the production of appropriate written material.”

A new 9.1 (f): “Particular management strategies will be developed for high-use areas, which are used by a range of users with differing values and interests. Such strategies will recognise the need to sustain the environment in these areas while ensuring that a range of visitor opportunities are provided in different settings for visitors with different capabilities, skills, values and interests.” This policy recognises that high-use areas will require different management strategies to the low-use parts of the public conservation lands.

9.2 (c) safety should be included as an important consideration here, consistent with the suggested changes TIANZ proposed for 9.1 (e)

9.3 (b) This policy should be amended so that demand would become a driver for influencing the development (or alteration) of visitor accommodation and services.

9.3 (c) We suggest this be deleted and replaced with: “new buildings for exclusive private use will be permitted on public conservation lands where such developments are consistent with policy 9.1 (b). This is essential because some concession holders need to provide facilities, such as staff accommodation, that are essential to the running of their business.

9.3 (d) We suggest this be deleted and replaced with: “ existing private facilities on public conservation lands may continue to operate, and be expanded where such development is consistent with policy 9.1 (b).” This is essential because some concession holders need to provide facilities, such as staff accommodation, that are essential to the running of the business. This policy should provide for expansion of such facilities.

9.3 (f) We suggest this be amended so it reads in its entirety: “visitor accommodation and facilities should be of an appropriate scale that reflects demand, and should harmonise with the landscape and seascape.”

Non recreational users

The proposed policies raise the following concerns for TIANZ:

- the importance of maintaining a balance between use and conservation.

- the importance of a specific consultation mechanism being in place to enable stakeholders and other interested parties to have ongoing input to the application of general policies.

TIANZ suggests the following amendments:

A new clause inserted being 10.1 (d): “DOC will undertake to build effective working relationships with interested stakeholders to ensure there is ongoing dialogue between DOC and stakeholders.”

A new clause inserted being 10.2 (g): “DOC will undertake to build effective working relationships with interested stakeholders to ensure there is ongoing dialogue between DOC and stakeholders.”

A new clause inserted being 10.3 (c): “DOC will undertake to build effective working relationships with interested stakeholders to ensure there is ongoing dialogue between DOC and stakeholders.”

A new clause inserted being 10.4 (c): “DOC will undertake to build effective working relationships with interested stakeholders to ensure there is ongoing dialogue between DOC and stakeholders.”

Knowledge and Information Needs

The proposed policies raise the following concerns for TIANZ:

- the importance of research, and collaboration in undertaking research being viewed as a high priority.
- overall conservation management being guided by sound research.

TIANZ suggests the following amendments:

- 11 (a): in the second to last line, replace “encouraged” with “undertaken” as research and monitoring, and the research this is based on, should be a high priority for DOC.

Conservation Management Strategies and Management Plans

The proposed policies raise the following concerns for TIANZ:

- ongoing involvement of stakeholders in having input to the application and monitoring of the application of general policies, and the mechanisms that might be used to provide for this input.

TIANZ suggests the following amendments:

A new policy (12 (j)) be included which would state as follows: “a stakeholder advisory group would be established to provide DOC officials with ongoing advice and feedback on the application of general policies. This group will also be used to provide feedback on areas where policies might need further refinement and/or amendment if necessary.”

Conclusion

TIANZ welcomes the development of a set of General Policies for conservation management and we believe this will lead to more integrated and nationally consistent management throughout the country.

At the same time, we have proposed a number of amendments to policies which would have the following outcomes:

- formal recognition that DOC is a key player in the visitor industry.
- Greater recognition of the role the tourism industry plays in helping to conserve the environment.
- More extensive ongoing involvement by our industry, and other key stakeholders in the fair application of policies, and providing feedback on the success (or otherwise) of policies.
- A balance between conservation, and reasonable use and enjoyment by all visitors to conservation lands.
- Stronger working relationships between DOC and the tourism industry.
- A greater emphasis on the use of research and data, and monitoring so that management is based on a sound understanding of impacts and effects.
- Conservation management policies that are fair, transparent and nationally consistent.
- DOC staff that are well informed about the tourism industry, and have a good understanding of the issues that are faced by tourism businesses in a competitive environment.

Tourism Industry Association New Zealand (TIANZ)

December 2003

Appendix-Limits of Acceptable Change Model

This model was developed in the early 1980s to help protect natural areas while enabling these areas to be used for recreational purposes.

This model has the following components:⁴

(1) The specification of acceptable and achievable resource and social conditions, defined by a series of measurable parameters; (2) an analysis of the relationship between existing conditions and those judged acceptable; (3) identification of management actions necessary to achieve these conditions; (4) a program of monitoring and evaluation of management effectiveness.

⁴ This material was adapted from McCool S.F 1989 Limits of Acceptable Change: Some principles in Toward Serving Visitors and Managing our resources: Proceedings of the Visitor Management Strategies Symposium, University of Waikato, Ontario Canada, and was taken from a paper presented by Professor McCool of the University of Montana, U.S delivered at the Workshop on Impact Management in Marine Parks August 13-14 1996, Kuala Lumpur, Malaysia.