

# **Tourism Industry Association New Zealand (TIANZ)**

## **Submission to the Department of Conservation Hearings on amended sections 4.16.1 and 4.16.2 of the draft Fiordland National Park Management Plan**

### **1. About our industry**

Tourism Industry Association New Zealand (TIANZ) is a membership-based organisation that serves as the ‘voice’ of the tourism industry. Members range from large airlines to small owner-operator tourism businesses that employ less than five people.

Tourism is now New Zealand’s largest single foreign exchange earner and overseas visitors spend over \$6.5 billion per annum while in New Zealand. One in ten New Zealanders is employed within our industry. Both international and domestic tourism contribute \$16.5 billion to New Zealand’s Gross Domestic Product (9.6% of GDP).

The lands managed by the Department of Conservation (the Department), including the Fiordland National Park (the Park), are a major drawcard for both New Zealanders and international visitors.

Milford Sound is an iconic natural visitor attraction in New Zealand. It is surrounded by world renowned walking tracks, scenic vistas, wilderness areas and heritage sites. The park has been associated with more than 100 years of tourism development with substantial capital investment that has contributed to its iconic and recreational value.

### **2. Our submission**

This oral submission comments on the proposed amended sections 4.16.1 relating to the Milford Sound, and proposed amendment 4.16.2 relating to the Milford Road. Our submission especially focuses on concerns that TIANZ has about the process being used to develop these amendments. We propose a way forward for the Department to collaborate with the tourism industry to develop a workable management plan for the Milford Sound that draws on the collective knowledge of all interested parties, and results in a joint vision, strategy agreement and management plan.

### **3. The partnership between the tourism industry and the Department of Conservation**

TIANZ has facilitated and promoted closer relationships between the Department and its leaders, and the tourism industry. This growing partnership is evidenced by statements by the Minister of Conservation, the Hon Chris Carter who at the New Zealand Tourism

Conference 2003 stated that: *"increasingly, the economy of whole regions hinges on a tourism industry that harnesses the appeal and recreational opportunities of conservation lands."*

At the officials level, there is the Tourism and Conservation Forum which is a quarterly meeting of officials from the Department of Conservation, The Ministry of Tourism and Tourism New Zealand with TIANZ and representatives from non-government organisations (NGOs) which have an interest in the relationship between tourism and conservation.

TIANZ proposes that this spirit of partnership be reflected in the manner in which the tourism industry and the Department work together, both at the policy and planning level, and in the day-to-day management of our public spaces. In short, a new model of engagement is required between the Department and the tourism industry - at all levels. A Memorandum of Understanding is proposed as well as development of a national strategy for visitor use of the DoC Estate.

#### **4. Overview comments**

TIANZ wishes to make a number of specific comments relating to the proposed amendments being considered at this Hearing. The majority of our comments relate to the process used.

First, we commend the Department for extending the time period allowed for the consideration of these proposals. We also wish to recognise the Department's foresight in recognising that Milford is a place of national iconic significance and a place where visitor quality must be maintained.

At the same time, there are a number of concerns that our members have with these draft proposals.

The following are the key issues we wish to articulate in our submission:

1. A vision is necessary for Milford Sound but the process used to develop this vision and 'buy in' for this vision is critical.
2. There is further opportunity for the Department and the industry to work more co-operatively in developing a shared vision for Milford Sound, and ways of achieving this vision (e.g the more collaborative approach being used in the pre-consultation work being undertaken by the Nelson-Marlborough Conservancy in the run-up to the preparation of the draft Abel Tasman National Park Management Plan).
3. There is an absence of quality research to back up the creation of a vision and to identify the current gaps between the vision and the present state of the environment. There also appears to be a limited understanding of visitor satisfaction in the Milford Sound. Previous research appears to have focused

- on particular tracks including the Milford Track. Visitor satisfaction research must focus on satisfaction of all users, and not just users of the tracks.
4. The Department is being prescriptive without a collaborative process and a robust ongoing research programme, for example, on visitor satisfaction. This is a particularly important concern for us given the level of tourism investment and national significance of the Milford Sound.
  5. Public notification is essential so that all key stakeholders are given the opportunity to fully participate in this consultation process.
  6. We would support moves which would lead the Department to working more closely with agencies including Transit New Zealand to improve the conditions and safety of the Milford Road. However, overall, the proposals in section 4.16.2 are pre-mature and further investigations are necessary. We believe the Department should continue the process of consultation with key stakeholders, to determine when and where specific interventions such as traffic controls or safety initiatives might be desirable.

Overall, the proposed amendment section 4.16.1 proposes a process to direct mass transit operations out of Freshwater Basin over the long-term “to allow for its restoration as a destination of high environmental and experiential quality.” The potential impacts of these proposals on business operators (both national and local) operating in the Milford Sound, and visitors are clearly significant.

The process set out in proposed amendment section 4.16.2 relating to the Milford Road would potentially regulate the volume and timing of the majority of arrivals and departures to the Sound. Regulation of traffic on the Milford Road would also impact on gateway communities such as Te Anau who benefit from pass-through traffic travelling to Milford Sound.

TIANZ suggests that careful consideration must be given by all affected parties to all of these impacts before these proposed amendments proceed any further.

We recognise the Milford Sound is a high use area and the growth in visitor demand experienced in the past is likely to continue into the future. As an iconic destination, it is essential there is a vision that incorporates the values of all users of the area, and that this vision has ‘buy-in’ from key stakeholders.

TIANZ is concerned that the draft Plan is now very different to the one the Department released in November 2002. The late addition of such radical amendments creates the risk of piecemeal planning, and the finalisation of a draft Plan that is internally driven by the Department, with external stakeholders effectively disenfranchised.

In this submission, we propose an alternative approach that might assist the Department to finalise a Plan that ultimately has the support of all stakeholders, including the tourism industry.

## **5. Specific comments**

In the following section, we make a number of specific comments on the proposed amendments.

### **5.1 The process used to date in developing proposed section 4.16.1 is inadequate to ensure a strong partnership between industry and the Department to successfully manage Milford Sound**

The Department has introduced these proposed amendments late in the process. We are aware this has generated angst among companies operating in Milford Sound.

We acknowledge that following negative feedback in November 2004 when these proposals were first released, DOC chose to postpone the hearings on these proposed amendments until February 2005. However, it still stands that these are major proposals being released at an advanced stage.

### **5.2 Commercial implications of proposed section 4.16.1 have not yet been worked through with operators**

The Department also appears to have insufficiently considered the commercial implications of shifting the main development node from Freshwater Basin to Deep Water Basin. This point has been clearly articulated in submissions presented by operators.

Factors that have been insufficiently considered include:

- The costs of transferring operations from Freshwater Basin to Deepwater Basin, and the fact that these costs could never be recovered from visitor levies.
- The implications of the proposals on businesses that have long-term leases, concessions and coastal permits.
- The merging of activities at Deepwater Basin, with fishing and tourism, and smaller tourism operators alongside larger vessels. This creates real safety and visitor perception issues.
- The practicality of the proposals given that many of the tourist vessels would be unable to enter Deepwater Basin given the narrow channel there, and the difficulties in negotiating variable river flows. It is not clear that the full safety implications of this are understood.

- The logistics of transferring operations and the timeframes realistically required for this from an industry perspective.
- The implications of the proposed shift in vessel operations on the visitor experience at Milford Sound. For example, visitors arriving at Deepwater Basin would not have the experience of viewing Mitre Peak on arrival prior to boarding boats as they do when they arrive at the present Freshwater Basin facilities.
- The economic and social impacts of the proposals on the Milford Sound community, and adjacent communities such as Te Anau and Queenstown
- The economic and social impacts of the proposals on our national community given the importance of Milford as an iconic destination.

We suggest that it would be completely pre-mature to proceed with these proposed amendments at this stage.

### **5.3 The Department has proposed one solution whereas there may be a range of possible options**

The proposed shift in vessel operations is being presented as a option that would achieve the vision set out in the rationale to the proposals, without, as far as we are aware, the consideration of a range of other options along a continuum. This continuum could range from incremental changes<sup>1</sup> over a longer period of time, to the proposals being proposed by the Department as contained in the amended 4.16.1. Clearly, the Department has not done this, and has presented the option of a relocation of vessel operations to Deepwater Basin as its preferred approach.

### **5.4 Proposed amendments are not supported by robust research**

TIANZ remains concerned about the lack of research on the relationship between human activity and the environment in the Milford Sound area.

We believe there is a general recognition within the industry that with levels of current and forecast visitor growth, robust planning is essential to preserve the environment at Milford, and to maintain the quality of the visitor experience.

At the same time we dispute the assertion that (see supplementary page in section 2.1):

*“there is a need to restore and reinforce the iconic status and to restore national park values back into Milford.”*

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<sup>1</sup> Examples might include staggering visitors, voluntary caps on visitor activity where this might be desirable, and a simple booking system for the Milford Road at certain times of the year

Robust and independent evidence is needed to justify this assertion. We are aware of companies such as Real Journeys that make extensive use of customer surveys. Their surveys have demonstrated high levels of visitor satisfaction with their Milford Sound experience, which suggests that visitor expectations of the state of the environment are so far being met.

We suggest that the Department is drawing conclusions about how the Milford Sound area must be managed without any evidence supporting the nature of proposed interventions.

TIANZ has previously advocated the use of the Limits of Acceptable Change (LAC) methodology (or similar) as a possible approach that the Department might use to manage National Parks with extensive involvement by stakeholders.

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:<sup>2</sup>

- (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.*

This model is used extensively in the United States and we believe should be used in New Zealand.

TIANZ does not willingly accept strict caps on visitor numbers and activity in the absence of such research and without an appropriate methodology to support decision-making. Visitor satisfaction research to date by the Department on the Milford Sound area has been irregular and is subject to variable interpretation (see especially *The Effects of Aircraft Overflights on Visitors at Milford Sound and Milford Track*, March 2000 as discussed in our submission on proposed amendment section 4.5 in November 2003).

TIANZ suggests that to protect the future quality of visitor experience, long-term research and monitoring into the carrying capacity of places such as Milford Sound is essential to preserve this environment. At present, the Department does not have the research information to justify being prescriptive in the way it has in the proposed amendment. This has the potential to deny visitors access when the environment might actually sustain such access. Caps that are not empirically based might also be

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<sup>2</sup> 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.

detrimental to the environment in the long-term as they might over-protect some areas, while under-protecting others.

We recommend that the Department works with tourism operators to develop further ways of spreading visitor arrivals so that caps can be avoided as far as possible, and only used as a last resort.

## **5.5 Proposed amendments should be publicly notified**

Consultation on this amendment must extend more widely than just consultation with those who previously submitted on the Draft Fiordland National Park Management Plan. We are aware of businesses operating at Milford Sound that did not submit on the Draft Plan who have found out about this proposed amendment through other operators. This is unsatisfactory given the potential impacts of these proposals.

TIANZ strongly recommends that the Department publicly notify the content of this proposed amendment to provide a widely opportunity for stakeholder involvement. These proposals are too significant to do otherwise.

## **5.6 Further work to examine visitor flows on the Milford Road is desirable but requires much further consideration**

We recognise the strong linkages between traffic on the Milford Road and managing visitor numbers and the timing of their arrivals and departures at the Milford Sound.

We are generally supportive of proposals for the Department to work more closely with Transit New Zealand and other agencies to advocate for improved safety on the Road, to ensure the Road continues to be maintained and improved at an appropriate level. We also support the measures that the Department proposes to take to improve the information available to drivers on the Milford Road.

At the same time, we urge the department to recognise that different visitors access Milford Sound through different transport modes and modes such as coach travel have a legitimate place. We are concerned that the Department appears to be making value judgments against coach travel through the use of loaded language such as “mass-market coach day visitors” (section 4.16 p2). In fact, this mode of transport also constitutes a form of public transport which reduces the need for as many private cars to transport visitors to the Milford Sound. Also, many Free Independent Travellers (FITs) use coaches to travel to the Milford Sound, some of whom leave their campervans in places such as Queenstown, reducing the number of campervans on the Milford Road.

Further investigations are necessary, in close consultation with the tourism industry to:

- determine what the precise issues are for the Milford Road
- identify where the pressures points on the Road are

- identify which times of the year and times of the day there are problems with traffic.

Clearly these issues would need to be carefully considered in close consultation with local businesses and community leaders in Te Anau and Queenstown to ensure minimal disruption to business activity.

TIANZ recommends that the Department consult further with the community on options for the management of this road. Those operating on the ground at Milford invariably have some understanding of the issues, and how they might be addressed.

## **6. An alternative consultation process**

We have previously mentioned our concerns that the Department has substantially revised the Plan since 2002 to the extent that its contents are now very different to the original draft Plan. We question whether the approach taken by the Department to date is an example of best practice, and whether rigidly following the minimum statutory requirements for consultation is the best way to develop a long-term management approach for Milford Sound.

The tourism industry is a key stakeholder and we suggest that a more constructive approach would be for the industry and the Department to work closely together on an informal basis outside the statutory planning process to develop a vision and set of objectives for the management of Milford Sound.

An ideal process would consist of the following:

- The development of a Memorandum of Understanding and agreement on a national strategy between TIANZ and the Department of Conservation.
- The development of a draft vision, values and objectives for the management of the Milford Sound area in close consultation with the tourism industry and other key stakeholders.
- Research and investigation into the current state of the environment, and the quality of the visitor experience. This might particularly focus on the relationship between the natural environment and human activity. It might also include modelling and the consideration of long-term visitor projections.
- Identification of the differences between the draft vision created and the current state of the environment and visitor facilities.
- Development of a draft plan developed by all key stakeholders and closely involving industry operators to work towards this vision. This plan might include a consideration of: types of visitors and their impacts; methods of managing visitors and their impacts through self-regulation; the identification of high use areas where there is agreement that a particular management regime might be necessary; areas that are appropriate to develop as visitor attractions; and areas that should be off limits to visitors.

- Once draft proposals have been developed, these might be publicly notified, and submissions from all interested parties considered.

Clearly, the development of the new National Park Management Plan for Fiordland is now at an advanced stage. We believe that, ideally, the process we set out above should have been undertaken at the beginning of the process. However, we believe that there is still an opportunity for the Department to “park” this section of the draft Plan and undertake a specific exercise with industry operators, in an effort to arrive at a more consensual position.

We note that the Department has temporarily “parked” the proposed amendment section 4.5 relating to aircraft movements in the Milford Sound area, and has provided the Queenstown-Milford Air Users Group (QMUG) with an opportunity to create new proposals for consideration by the Department. We commend the Department on the approach it has taken in this case, and we believe that this approach could also be taken for proposed amendments 4.16.1 and 4.16.2.

We urge the Department to consider such an approach and TIANZ is committed to working in any way it can to facilitate this.

## **7. Recommendations**

TIANZ recommends that:

- The Department **notes** that the industry proposes the development of a Memorandum of Understanding and agreement on a national strategy, followed by use of a vision and long-term objectives that flow through to an action plan to help manage Milford Sound sustainably.
- The Department **notes** our concerns that the approach taken so far has done little to maintain or foster good quality working relationships between the tourism industry and DOC.
- The Department **“parks”** proposed amendments sections 4.16.1 and 4.16.2 and sets up other processes to work with the tourism industry to reshape these proposals, while drawing on the work undertaken so far, including the Milford Concept Plan. We believe this process would lead to the most appropriate decisions being made for the future management of Milford Sound.

Thank you for the opportunity to present this submission. TIANZ hopes the Hearings Committee finds these points both useful and constructive, and we offer to assist the Department to resolve these matters in any way we can.

*Tourism Industry Association  
18 February 2005*