



## **Tourism Industry Association New Zealand**

### **Comments on the Department of Conservation Towards a better facility network**

**January 2004**

## About Our Association and Industry

The Tourism Industry Association New Zealand (TIANZ) represents the interests of over 3,000 businesses in the tourism industry.

Tourism is a \$16 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;
- Is split between international and domestic customers;
- Can offer a good return on investment.

The tourism industry in New Zealand consists of more than 10,000 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.
- Specific comments on the 'towards a better facility network' project being undertaken by the Department of Conservation (DOC).

## **Sustainable tourism's role in conserving our environment**

Tourism provides considerable benefits to the overall environment in New Zealand (economic, social, cultural, and environmental). Our industry is a key driver for national and local economic development.

Our environment/scenery is a key drawcard for visitors and is fundamental to New Zealand's international brand (100% Pure).

- 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 DOC lands.
- An industry that strongly contributes to New Zealand's welfare through: PAYE; corporate taxes; Goods and Services Tax (the only 'export 'industry to do so); and concession fees.

## **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.<sup>1</sup>
- TIANZ acknowledges the Department of Conservation (DOC) as a key player within the New Zealand tourism industry, given its responsibilities for managing Public Lands, many of 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 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

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<sup>1</sup> See appendix for further information on this model.

sensible controls are needed on private business activity on DOC lands to ensure sustainable management.

- We support ongoing review of DOC'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.
- DOC, as well as the industry, has a key role in helping to ensure visitors have a quality experience when visiting their lands. 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.
- DOC must acknowledge different users of their lands, and manage lands based on this use.

TIANZ welcomes the opportunity to take part in the discussions on developing an appropriate network of visitor facilities and we base our input on these principles.

## **TIANZ key Concerns with the review of visitor facilities**

TIANZ welcomes and appreciates this review of facilities, and we support ongoing reviews of the services and facilities provided by DOC, given that use patterns change over time. Given the growth within the visitor industry, the mix of users is also changing and must be taken into consideration when assessing the nature of facilities to be provided.

While TIANZ welcomes the value of this review, we believe that the timing for the completion of this exercise is at odds with the timing for the finalisation of the draft General Policy.

Any review of visitor facilities, and the appropriateness of these facilities must be soundly based on the content of the General Policy, as should all future DOC policy documents. We understand that the purpose of the General Policy is to provide a general policy framework that steers the content of more detailed areas of DOC policy. The draft General Policy is currently at the stage of work-in-progress, and we understand that submissions on this policy are still being considered by DOC.

At this stage, there is a risk that this review of visitor facilities will be completed before DOC has time to amend the draft General Policies in line with stakeholder concerns. If this occurs, concerns such as the ones we have expressed will not be resolved, and indeed the management practices that concern us will continue on into the next generation of DOC policies, including policies used to determine appropriate visitor facilities.

Therefore, we recommend that the timeline for the review of visitor facilities be extended so that it is able to have adequate regard to the General Policy once it is finalised. We have included a copy of our draft general Policy submission for your reference.

This review should also reflect the true use of the facilities on DOC lands and not simply the preferences of groups that take part in the review process. Data collected on the activities undertaken by both international and domestic visitors shows that visits to the DOC estates feature highly as travel activities.<sup>2</sup> The final provision of facilities should reflect this mixture of visitors. Department of Conservation figures (as at December 2003) indicate that almost 90% of visits to national parks, forest parks, heritage areas and reserves were from short stop<sup>3</sup> (for up to an hour) or day visitors<sup>4</sup> (from one hour to one day). This review must take these into account. TIANZ supports the provision of facilities that cater for a broad range of users, (including mobility impaired users) and not just experienced recreational users.

In addition to these overview comments, we have some more specific points relating to the review we wish to raise. Many of these comments relate to the additional factors that should be taken into account by DOC in determining the most appropriate mix of facilities to be provided.

## **Specific comments on the review of visitor facilities**

These specific comments include:

- TIANZ requests the opportunity to examine and to comment on other stakeholder contributions, especially those regarding policy direction and facilities criteria at an appropriate time. Such criteria will often reflect the perspectives of particular user groups. Clearly, during this process many stakeholder groups will propose alternative criteria. TIANZ believes that any proposed alternative criteria should be considered in a publicly transparent manner.
- International visitor and domestic marketing campaigns have implications for the use of DOC lands and facilities from a destination marketing perspective. TIANZ supports the development of strong relationships between agencies involved in visitor marketing and DOC staff to ensure a good flow of information between such agencies,

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<sup>2</sup> View the International Visitor Survey and Domestic Travel Survey results on the Tourism Research Council New Zealand website [www.trcnz.govt.nz](http://www.trcnz.govt.nz)

<sup>3</sup> 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. This figure was included in our submission to the DOC draft General Policy

<sup>4</sup> 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. . This figure was included in our submission to the DOC draft General Policy

and mutual understanding of the issues faced by such agencies. Clearly, DOC ideally should understand the current and projected visitor flows, and marketing agencies need to appreciate the implications of visitor flows for the management of DOC lands.

- TIANZ supports sophisticated and ongoing monitoring of visitor (and facilities use flows) to DOC lands to provide information that could be used to manage growth in the future.
- TIANZ supports an integrated research strategy (in partnership with stakeholders) to develop a bank of information that can help guide facilities management and planning in the future. Such research should also identify the carrying capacity of facilities (and the lands that contain them) to ensure that facilities and lands are managed appropriately, and their true capacity is identified.
- We encourage the use of visitor surveys to gauge satisfaction with existing facilities based on use by visitors. Such surveys should be undertaken using samples that reflect the range of users of facilities on the DOC lands. We believe that this approach will ensure that input can be sought from a wide range of users, and not a small select group. This approach will also provide DOC with documentary evidence of the preferences of visitors that can be used to support future provision and resource allocation decisions.
- TIANZ supports DOC continuing to pro-actively involve all stakeholders (including tourism representatives) in helping to plan for the development of visitor facilities, and changing the nature of facilities as required over time. We encourage DOC to maintain positive relationships with all user groups in order to facilitate ongoing stakeholder involvement.

As a final comment, TIANZ applauded the government's decision to allocate in the 2002/2003 budget a further \$349 million for the provision of visitor facilities. We believe this decision was made in part due to the success of the tourism industry, and from the recognition that tourism and tourism attractions are a powerful catalyst for local economic development. We believe that these facts should be acknowledged as part of the review, and provide further justification for DOC to be fully mindful of tourism in making decisions about the provision of visitor facilities.

*Tourism Industry Association New Zealand (TIANZ)*

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