



tourism  
INDUSTRY

ASSOCIATION NEW ZEALAND

**Draft Stewart Island / Rakiura Conservation Management  
Strategy (SIRCMS)**

**And**

**Draft Rakiura National Park Management Plan  
(RNPMP)**

**11 March 2009**

## Introduction

1. This paper is from the Tourism Industry Association New Zealand (TIA), located at level 4, Tourism and Travel House, 79 Boulcott Street, Wellington.
2. Attached as Appendix 1 are details about our organisation and who we represent.
3. The paper provides comment on the draft Stewart Island/Rakiura Conservation Management Strategy and the draft Rakiura National Park Management Plan
4. If you wish to contact us regarding this submission, in the first instance, please telephone Geoff Ensor, Advocacy Manager on 496 4889 or e-mail [geoff.ensor@tianza.org.nz](mailto:geoff.ensor@tianza.org.nz) or Simon Wallace, Policy Manager on 04 494 1842 or e-mail [simon.wallace@tianza.org.nz](mailto:simon.wallace@tianza.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...”***

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 dependent 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 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 in 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. This submission on the draft Stewart Island/Rakiura Conservation Management Strategy and the draft Rakiura National Park 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.

## General Comment

11. TIA wishes to acknowledge the consultation process undertaken by the Department. In our early submission dated January 2007, we made the following points:
  - a. *TIA supports the parallel process of combining the CMS and NPMP as it will avoid delays to what is already a prolonged process. We encourage the Department to engage with as many stakeholder groups as possible, including those who have an interest in the Plan, but who may live outside the boundaries of the Southland Conservancy.*
  - b. *A significant challenge for DOC will be to ensure the draft plans are read and commented on by as many people as possible. The form in which it is distributed, whether in hard copy, on the web, or on CD, will play a role in the amount of feedback received. We understand submissions may be called for in January 2008, and this is at the peak of the visitor season which extends from October to April, we would ask the Department if they could allow a sensible timeframe in which tourism operators can respond.*
  - c. *A succinct Executive Summary to accompany both draft documents for the CMS and NPMP will be helpful for those overwhelmed by the full versions. TIA and Venture Southland will be encouraging operators to actively participate in the formal submission process.*
12. While the time frame of January 2008 has clearly drifted to 2009, TIA compliments the department on fulfilling its obligations in regards to a 11a 11b above. With regard to 11c, TIA understands the hooks for the Department in creating a shortened version of the whole document,

when the devil may well be in the detail. However, given the sheer size of the documents, TIA will continue to advocate for a short 'summary of structure' which guides readers through the document and helps to clarify layout and linkages.

13. The meaning of the term 'tourism' in New Zealand is often misconstrued. Some interpret it as applying to international visitors only, for others it conjures up images of coach travel and hundreds of visitors descending on national parks. Tourism is in fact international visitors and New Zealanders travelling to, from and within New Zealand, seeking a range of different experiences and interacting with communities, each other and the environment.
14. The point TIA wishes to make strongly is that using 'tourism' in the context of this draft is misleading. Recreation is the same whether it is commercially delivered or enjoyed independently. Some choose to explore and experience New Zealand without making use of commercial operators, while others prefer to pay for the experience and utilise the skill and knowledge of professional guides. Both options complement each other and add value to outdoor recreation by offering experiential choice.

### **Recommendation**

15. Any references to 'tourism' within the entire document are (where practical) replaced with the term 'commercial recreation' or 'commercially delivered recreation'.

### **Table 9 / 8. / page 58**

16. It is proposed that concessions are not granted for wilderness areas. The statement below (cut from table 9 on page 58) applies to concessionaire activity within other recreational settings and we believe this thinking should apply equally to wilderness zones:

*ii) Concessionaire client activities should not be advantaged or disadvantaged compared with those for non-concessionaire visitors, unless there is a specified reason for different management. The outcomes, objectives, and policies for places within the Stewart Island / Rakiura CMS area apply.*

17. As an aside, we note that the West Coast CMS is supportive of concessionaire activity into gazetted wilderness zones providing group size and frequency are compatible with the area.
18. TIA believes national consistency on concessionaire access to wilderness areas is required and if group size and frequency are

closely managed, our Association is adamant that wilderness areas should not exclude commercial recreation. In essence, TIA does not see a small guided trip having any more impact on a place's values than an unguided party – and potentially less so.

19. In addition we note a number of concessionaire opportunities have been condemned as '*not to be considered*' because they are not consistent with the outcomes sought for that area. Once again TIA struggles with exactly why well managed commercial recreation of appropriate scale and frequency should undermine the outcomes sought? Unless justifications for such decisions can be clearly articulated, we ask that such limits be revisited and potentially removed. Recreation or commercial recreation? It's all recreation and provides visitors to the island with choice.

### **Recommendation**

20. The Department allow concessionaire activity in wilderness zones providing group size and frequency are appropriate to preserve the place's intrinsic value.
21. Other places proposed as concessionaire-free are revisited and flexibility is applied to decision making e.g. concessionaire activity is considered sensibly on a case by case basis.

### **Activities Requiring Specific Authorizations / 1.7 / page 69**

22. TIA believes that the section as a whole, does not encapsulate the benefits of commercial recreation to NZ, regions, communities, DOC, visitors and the environment. While there are small snippets which reflect the benefits attributable to commercial recreation, they are small when one considers the reliance of Stewart Island's community on the visitor industry and the need for symbiotic relationship between the Department and the commercial sector.
23. Words like 'foster' and 'partnership' as they relate to the DOC/concessionaire relationship are missing. TIA believes a partnership management approach between DOC and concessionaires is vital and will result in the best safety, quality and environmental outcomes. TIA would like to see DOC's intent to work collaboratively with concessionaires enlarged upon in this section.

### **Recommendation**

24. That DOC ensures the strengths of commercial recreation/concession activity are fairly documented and the following points are incorporated in 1.7:

25. The role and benefits of commercial recreation include:

- Contributing to the protection and enhancement of the environment
- Education: Communicating appropriate information, behaviour, protocol, and conservation messages to visitors
- Assisting with research and monitoring
- Enabling a wide range of people irrespective of age or physical ability to enjoy the outdoors
- Providing a pool of trained people for search and rescue
- Contributing to the local and national economy
- Offering recreational choice

26. Additional mention is made in 1.7 that signals DOC's intention to work with concessionaires and support their efforts to deliver value to visitors while protecting and enhancing the environment.

**Policies / 7. 8. 10. / Page 205**

*The public will generally have free access to the national park on Ulva Island. A restriction on access during the hours of night should be investigated as well as a restriction on overnight stays and / or camping within the national park on Ulva Island. Bylaws may be an option for achieving these access restrictions.*

*Concessionaire opportunities that are consistent with the outcomes sought for Ulva Island as a place include guided walking, bird watching and nature appreciation activities. Concessions need to be consistent with the outcomes sought for Ulva Island as a place, such as adding no artificial noise to the Ulva Island environment.*

*Encourage recreational users and water taxi operators to adopt similar measures as in policy 9 above, to maintain and enhance the visitor experiences consistent with outcomes for Ulva Island*

27. From discussion with members, TIA strongly agrees with these policies. TIA recognizes Ulva Island as sanctuary of national and international significance which needs close and responsible management.

**Recommendation**

28. Policies 7. 8. 10. are retained for Ulva Island.

## **Policies / 10. / Page 218**

*The construction of new commercial accommodation facilities in the Mason Bay area are not considered consistent with the outcome and applications should be declined. The public accommodation facilities operated by the Department of Conservation and the Rakiura Hunter Camps Charitable Trust meet the outcome sought for Mason Bay as a place.*

29. TIA requests that the Department revisit this policy. While we are aware that Mason Bay hut was upgraded during 2005 in response to overcrowding concerns, member feedback has not reassured us that the issue has been resolved.
30. TIA sees no reason why another hut, carefully sited and built, should not be considered, particularly if the impact of this is measured against the ongoing tensions that are likely to remain over the life of the plan.
31. Improved visitor experiences are at the heart of our argument. This is not a request to increase concession activity in Mason's Bay, but rather to leave a door open for a management response which will address growing concerns.
32. Mason Bay and its environs is nationally well known and one of the 'must-dos' for many visitors to the island. A highly prescriptive policy as proposed, which removes any opportunity to build additional commercial accommodation, represents a threat to sound management of the site in the future.

## **Recommendation**

33. Policy / 10. / Page 218 is removed.

## **Policies / 12 & 14 / Page 229 & 230**

- 12/ *Concessionaire party sizes within Port Pegasus place should be restricted to one party per week with a maximum party size of 8 (inclusive of guides) unless otherwise provided in policy 15.*
  - 14 *Overall access to the Cook Arm Shipbuilders Base should be limited to 100 visitors per annum. For all other sites listed in policy 13 there should be an overall limit of 225 visitors per annum.*
34. TIA questions the restriction of one party per week for Port Pegasus, together with annual visitor limits. Such arbitrarily set limits represent an extremely blunt instrument with which to achieve social and environmental outcomes.

35. Cause and effect are at the heart of this issue and given the impact of seasonality and weather on commercial operations, TIA believes a daily limit should be considered that provides operators with flexibility while not undermining the outcomes sought.

### **Recommendation**

36. The visitor limits per week and per annum for Port Pegasus is revisited on the grounds that a more flexible approach, which recognises business reality, will assist the viability of commercial recreation in the area, without undermining the value of the place. We urge DOC to engage with concessionaires and discuss a limit regime that meets everyone's needs, while not detracting from the outcomes sought for Port Pegasus.

### **Suggested addition**

37. TIA believes the CMS should hold a section dedicated to research and monitoring. It is critical that stakeholders are informed and when appropriate, included in all stages of research and monitoring:

38. A degree of cynicism will exist if the methodology associated with research and monitoring is not understood and/or thought to be flawed. Such an approach threatens to undermine stakeholder support for the results and consequently DOC's management response.

39. As an example of collaboration, DOC and Environment Southland have embarked on a process to develop a visitor survey for Milford Sound – a large range of local and national stakeholders are engaged in this process and TIA believes the outcome will lead to appropriate, effective and well supported management decisions.

### **Recommendation**

40. That an additional paragraph or section is inserted, highlighting the importance of a collaborative approach to research and monitoring and giving guidance on how it will be achieved.

### **Other**

41. TIA thanks the Department for the opportunity to comment. The Association is interested in 'all things visitor related' within the draft CMS MP and wishes to reserve the right to talk to the Conservation Board on issues that we may have not alluded to directly within this submission.

## **Background Information on the Tourism Industry Association New Zealand (TIA)**

42. 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.

43. Tourism is an \$20.1 billion industry (\$8.8b from international and \$11.3b from domestic tourism) with international tourist expenditure accounting for 18.3% of New Zealand's total export earnings.<sup>1</sup> 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 9.2% 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.

44. 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 has revitalized those assets and the communities that depend on them.

45. 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.

46. 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.

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<sup>1</sup> "Key Tourism Statistics – December 2008, Ministry of Tourism website