



tourism
INDUSTRY

ASSOCIATION NEW ZEALAND

**A submission to the Department of Conservation (DOC) on the
Draft Tongariro National Park Management Plan Partial review**

10 December 2010

Comment:

TIA's submission relates specifically to the proposed change to 4.4.2.5 Transport Tongariro Alpine Crossing – Policy 9: *Removal of the Transport Concession Limit for the Tongariro Alpine Crossing (TAC)*.

As the TIA representative on the Tongariro Alpine Crossing User Group (TACUG), I attended the group's most recent meeting on 14 October 2010. Department of Conservation (DOC) representatives gave a short presentation and invited discussion on the Tongariro National Park Plan (TNPP) partial review.

The Department's justification for the proposed change appeared to include:

1. Historic research showing that the crossing can take more people, so a limit on the number of concessionaires is not required.
2. Current concessionaires (26) do not have any cap on the numbers they may carry; therefore the whole regime needs to change so that visitor limits can be applied to each concessionaire.
3. The current Limited Supply situation for the 26 existing concessionaires means they will face a tender under the current policy wording. The proposed change will remove that requirement.
4. The government want to enable business; in response DOC will remove the limit on concessionaire numbers to allow more business to occur.
5. The proposed changes will address policies that were established to manage impact and/or reduce effects on the environment, but are not delivering their intended outcomes.

While this was my interpretation, it became clear that operators too were confused and struggled to follow the logic underpinning the proposed change. TIA has read the DOC information sheet on this issue, but still feel concerned enough to put in this submission.

In relation to 1:

We note that the most recent research appears to be August 2007 (Establishing Integrated Use Limits on the Tongariro Crossing, TNP).

Our reading of the report doesn't lead us to the automatic conclusion that the Crossing can take more people, in fact on page vii of the report it states under 'Management Options': *The conclusion that the number of walkers on the track appeared to have a strong impact on perception, expectation and detracting from experience, raises questions about options for future management of social impacts of use on the Crossing.*

We urge caution using the report findings as part of the justification for increasing transport concessionaire numbers; not only is it over three years old, it also clearly illustrates the complex 'integrated' management regime needs to cope with a huge range of factors including seasonal and daily variation, holiday spikes, differing visitor segments and safety. In our view, it reinforces the need for well considered, integrated management that focuses on environmental outcomes, and the visitor experience - not simply a decision to increase the number of concessionaires.

In relation to 2:

TIA is unclear why the Department cannot work with the existing concessionaires to establish limits that reflect the operator's current use, with allowance for growth. Initial comments from operators indicate they would be happy to talk with DOC about a cap on numbers should this be required. This possibility appears to be reinforced in the proposed change to 4.4.2.5 – Policy 10 and TIA supports the deletion of the sentence linking a cap on passenger numbers to the financial year ending 2004/05. TIA seeks clarification on this point.

In relation to 3:

As a limited supply situation, TIA is unclear why operators are being told that they will be automatically tendered at the time of renewal. On 5 August 2008, TIA, DOC and the Ministry of Tourism (TMT) signed an agreement (attached) that set out the process for managing concessions in limited supply situations. Within this agreement was a list of qualifying criteria that if met by the concessionaire, would give them a preferential right to apply for a concession of similar scale and activity at the same location.

In addition TIA and DOC have agreed on a process for managing significant under-use of a concession opportunity which we understand may also be an issue for some of the 26 concessionaires.

TIA seeks clarification about the LSC agreement as it applies to this situation.

In relation to 4:

TIA does not believe that the government wants to enable business irrespective of impacts on the visitor experience, the effects on existing concessionaires and/or the risk to the environment. TIA and DOC have been 'as one' in pursuit of high quality, safe businesses that are aligned with conservation outcomes.

In relation to 5:

The case for changing a policy because it is not managing impacts and/or reducing effects on the environment has not been made as it applies to removing the transport concessionaire limit. It is clear that the Department is concerned about the lack of a limit on coaches or people for individual operators, but as we mention in 2 we have not received justification for why DOC would not work with existing operators to set limits and also address those with low or nil usage. In addition, Policy 10 appears to provide a process for applying a daily limit of passengers for transport operators.

Conclusion:

It is difficult for TIA to support the proposed change given the multitude of conflicting motivations/arguments put forward for doing so.

DOC has clearly made a significant effort to consult widely and over a very reasonable time frame, but TIA remains concerned at the lack of supporting arguments for removing the limit given the potential implications of doing so.

TIA believes the Department should undertake additional consultation with operators and other track stakeholders which includes providing them with clarity about 'why' the Department is advocating for the change.

TIA suspects there are some quite valid reasons for pursuing the change, but the case has simply not been put well enough. A lot is at stake including the livelihoods of incumbent transport operators, the quality of the visitor experience, visitor safety, seasonal fluctuations, hourly and daily impacts and the effect on the environment.

We would like to be heard at future hearings on this matter.

Should you wish to contact TIA regarding this submission, please telephone TIA Advocacy Manager Geoff Ensor: 04 496 4889 / geoff.ensor@tiaz.org.nz

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Background

A bed-rock of New Zealand's economy

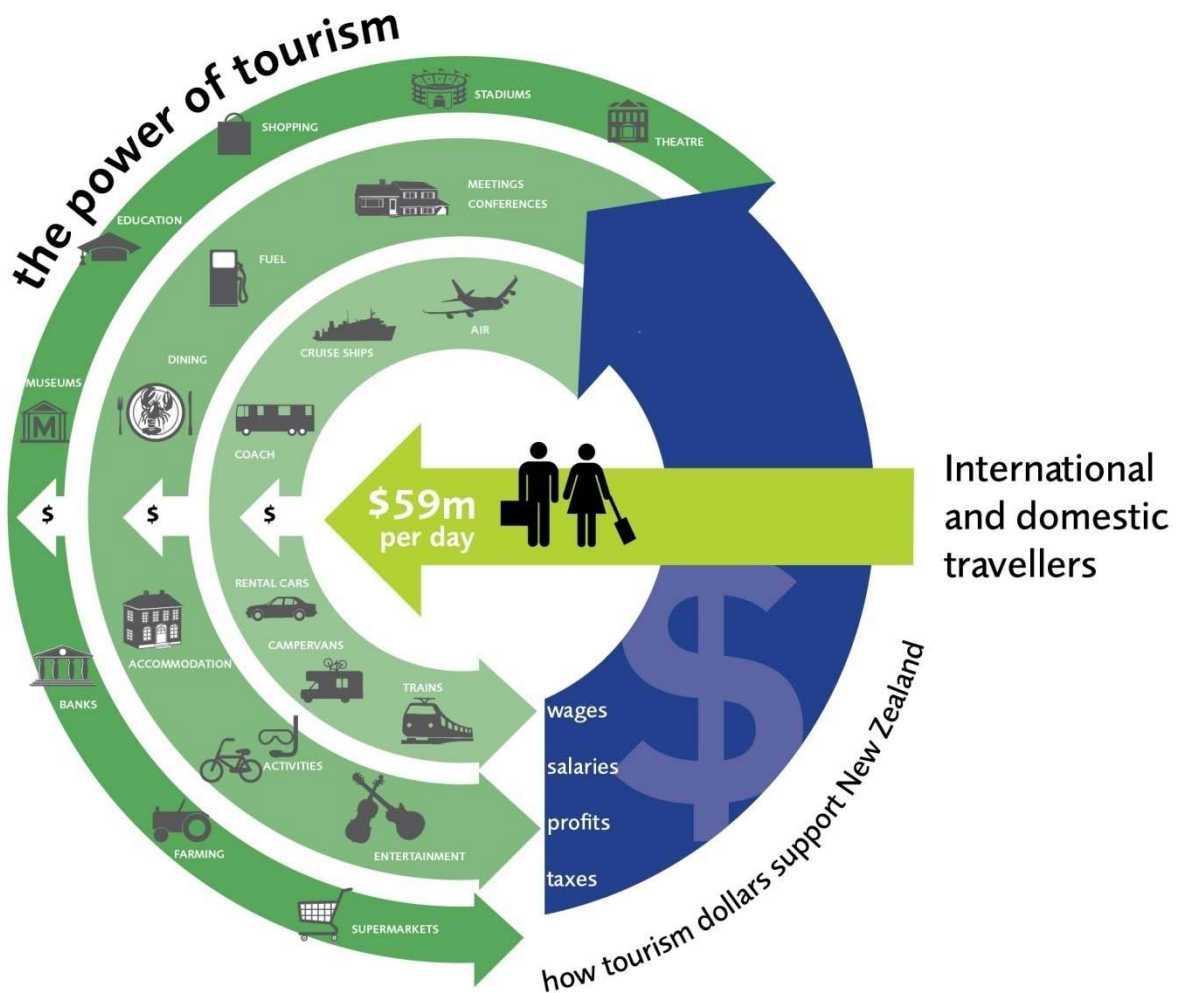
1. Tourism is a major contributor to the New Zealand economy that will always be here – and won't easily go offshore. Tourism takes the lead in promoting New Zealand to the world. Thanks to our 100% pure positioning, New Zealand is recognised as one of the most beautiful, unspoiled and scenic places on earth. 100% Pure signifies pride in our country, pride in our people and culture, and pride in the unique environment and experiences that New Zealand offers.
2. The brand positioning built by a vibrant tourism industry has become an important source of national confidence and identity and a front window for "Brand New Zealand". Indeed, the clean, green, pure offer that is synonymous with New Zealand tourism has been widely adopted and used to promote New Zealand exports in a range of other industries as well.
3. If New Zealand Inc. is to continue to prosper, to attract investment and to raise its position in OECD rankings, then it is vital the tourism industry, and the positive image it projects, remain strong.

Delivering Value

4. Below is a snapshot of the economic value provided by tourism to the New Zealand economy.
 - Tourism contributes nearly 9% of gross domestic product (GDP) for New Zealand as well as directly and indirectly employing one in ten New Zealanders.
 - Tourism in New Zealand is a \$61 million per day industry. The New Zealand tourism industry delivers \$26 million in foreign exchange to the New Zealand economy each day of the year. Domestic tourism contributes another \$35 million in economic activity every day.
 - Tourism expenditure reached \$22.4 billion for the year ended March 2010. International visitor expenditure accounted for \$9.5 billion or 18.2% of New Zealand's foreign exchange

earnings and is the country's largest export industry.

- Importantly, and despite more challenging times in the past two years, tourism is New Zealand's largest foreign exchange earner and its contribution is felt at national, regional and local levels.



About TIA

5. TIA has been the lead association that represents the interests of about 1,700 tourism businesses in New Zealand. The Association was first established in 1955 and the businesses TIA represent cover a range of tourism-related activities – hospitality, transport, accommodation, adventure and activities, attractions and retail as well as related tourism services.
6. The primary role of TIA is to be the voice of the tourism industry. This includes working for members on advocacy, policy, communication, events and membership and business services.

The TIA team is based in Wellington and led by Chief Executive, Tim Cossar.