



Submission to
Department of Conservation on
Draft Aoraki Mount Cook National Park Management Plan

Date: 4 February 2019

Tourism Industry Aotearoa (TIA) welcomes the opportunity to comment on the Draft Aoraki Mount Cook National Park Management Plan (Plan). This submission represents the views of Tourism Industry Aotearoa as a collective whole and may not necessarily represent the views of individual members.

This submission is filed without prejudice to TIA's future position. Our ability to prepare a comprehensive submission responding to the consultation document relied on the provision by the Department of Conservation (DOC) of information relevant to the connection between the consultation document and the benefits that would accrue. If any information is provided at a later date, TIA reserves the right to comment further.

Executive Summary

The Conservation/Tourism Partnership is one of the key relationships for the tourism industry. Many New Zealanders feel a close affinity to nature and seek outdoor experiences around the country, and the primary reason many of our international visitors come to New Zealand is to see our vistas and landscapes and experience the outdoors. Much of this activity occurs on the conservation estate. In 2015, TIA and DOC signed a formal partnership agreement which seeks to provide for both tourism and conservation in a mutually beneficial framework, enabled by a vision of 'A partnership that is positive, enduring and a win/win for tourism and conservation'.

The Plan's attention to the management of visitors is to be commended. There is no doubt that this is the area of most significant change and increased pressure in managing the Aoraki Mount Cook National Park. International visitor numbers have increased dramatically, our domestic population has grown substantially, and people's appetite to interact with our national parks remains strong.

Many people who visit the Aoraki Mount Cook National Park either need or choose to do so with support from concessionaires, while others do so under their own steam. The experience from these two types of visitors is equally as valuable. However, meeting varied needs can be challenging as the preferred experience of one group may not be compatible with the other e.g. trampers in a remote area wanting tranquility vs. visitors who choose to fly in. TIA firmly believes that the needs of different groups can be met and that these visitor experiences can be catered for in the Park, albeit not always in the same place and at the same time. The management of activities by limiting where, when and how often they occur are important tools which TIA supports. Taking a whole-of-park approach to allocating these limits is important and TIA acknowledges DOC's attempts to do this.

Our domestic population and visitor economy are now both of a size where people cannot expect to do whatever they like, whenever and wherever they like in our national parks. This paradigm and the associated management limits which come with it is not new for concessionaires, but will be for many of the people who visit our national parks under their own steam. This change may require significant adjustment for many people and will need to be managed with great care. Introducing new management tools such as park & ride and hut booking systems into Aoraki Mount Cook national park are significant changes for New Zealanders. The debate over these proposals may well include a conversation on preferential access for New Zealanders.

A step change is necessary in how we manage our national parks. TIA can see that DOC are trying to achieve this and we support their effort to do so. There is, however, much detail to be worked through to ensure these efforts achieve their intended outcomes. Change must be community-led and DOC must be very clear on what it is doing and why.

People must feel that their visitor experience is valued, and that their use of the Park has been allocated fairly. They need to clearly understand what type of experience they can have in different parts of the Park, particularly in terms of interaction with other visitors. Our feedback to DOC is that they listen carefully to submissions from concessionaires and recreational groups and adjust the Plan until the various visitor experiences are administered for and clearly understood. TIA has identified more than 40 areas of the draft Plan where further analysis and discussion is required.

One of the particular challenges of this Plan is that it includes the management of Mount Cook Village. TIA commends DOC's proactive approach and notes that it will be important to retain the community heart of the Village whilst enabling its function as a destination in itself and the gateway to the Park.

We also recommend that the purpose of our parks as defined in the National Park Act plays a more dominant role in setting the context for the Plan. The Act aims to preserve our highly valued natural places in perpetuity – for their intrinsic worth and for the benefit, use and enjoyment of the public. While the management content of the Plan does support conservation outcomes, TIA believes that it would better reflect our and the New Zealand public's expectations if the Plan's context was more centered on the importance of the conservation aspect of the management of the Park.

We look forward to working with DOC and other stakeholders to refine the draft and develop a Plan which meets the challenges of today's context as well as being fit for purpose over the full life of the Plan. The ability for the Plan to be reviewed as required will be important to this.

Introduction

1. Tourism Industry Aotearoa (TIA) is the peak body for the tourism industry in New Zealand. With around 1,600 members, TIA represents a range of tourism-related activities including hospitality, accommodation, adventure and other activities, attractions and retail, airports and airlines, transport, as well as related tourism services.
2. The primary role of TIA is to be the voice of the tourism industry. This includes providing leadership and advocacy across the breadth of the visitor economy including domestic and international visitors, and working for members on advocacy, policy, communication, events, membership and business capability. The team is based in Wellington and is led by Chief Executive, Chris Roberts.

Stakeholder Engagement

3. During the development of this submission we have engaged with various stakeholders including TIA members. This has included aircraft operators, guided climbing operators, heliski operators, operators interested in applying for concessioned activity in the future, the NZ Mountain Guides Association, Federated Mountain Clubs, the NZ Recreation Association and the NZ Alpine Club. We acknowledge and thank them for their input.
4. Any enquiries relating to this paper should in the first instance be referred to Rachael Moore, TIA Industry Advocate, at rachael.moore@tia.org.nz or by phone on 021 0225 2497.

The Conservation/Tourism Partnership

5. In 2015, TIA and DOC signed a formal partnership agreement which seeks to provide for both tourism and conservation in a mutually beneficial framework. The agreement includes a vision statement of 'A partnership that is positive, enduring and a win/win for tourism and conservation' and is supported by a set of principles and strategic goals. An ongoing close partnership between TIA and DOC allows both the preservation of natural resources and an evolving and sustainable presence of tourism operations in national parks to be better catered for and kept front of mind. TIA considers that enabling visitors to enjoy and access national parks provides a valuable opportunity to highlight the importance of New Zealand's public conservation land, and for visitors in turn to understand and care for those important places.
6. TIA is also currently working closely with DOC as they develop their Heritage and Visitor Strategy. TIA sees this Strategy as an opportunity for DOC to establish an internal approach to managing visitors and concessionaires that is coherent, streamlined and aligned with the Government Tourism Strategy, other government departments and the tourism industry's 2025 framework. With the new DOC Heritage and Visitor Strategy scheduled for adoption in 2019, all future park plans should reflect its vision and principles.

7. TIA's key priorities for working with DOC to cater for visitor experience through the Park Plans are to:
 - Collaborate closely to share and understand tourism and conservation objectives;
 - Improve access and appropriate opportunities on public conservation land for tourism operators through more responsive Park Plans;
 - Ensure that any limits on use of resources are put in place in accordance with reliable evidence, that a preference is given for adaptive limit setting according to policies and set outcomes, and that the impact of any limits on visitor access and business operations is taken into consideration;
 - Enable a consistent and transparent concession application and renewal process which provides certainty for stakeholders;
 - Implement effective monitoring and enforcement systems;
 - Ensure Park Plan requirements are consistent with tourism industry best practice standards, including aligning with user group agreements and written best practice standards where relevant.
8. TIA sees every National Park Plan review as an opportunity to do things better - to provide for the preservation and protection of the natural environment, whilst allowing opportunities for domestic and international visitors to have access to positive outdoor experiences, and contributing to the resilience of local communities and their local tourism operators.
9. TIA truly believes that conservation and tourism can be managed in a way to benefit both. Where people are able to experience a national park environment they in turn become connected to that place. When done well, this supports a sense of ownership, responsibility and understanding for the values of conservation.
- ~~10.~~ Tourism operators provide significant benefits to national parks including supporting the engagement of people with natural places, controlling and managing that engagement, concession fees, direct enhancement of the natural environment, education benefits, and infrastructure development.
11. Provisions within park plans should be developed in a 'community-led' way, to provide a document which serves the needs of the entire community of park users including iwi, visitors, tourism operators, researchers and education.
12. TIA considers that all visitors to a National Park, whether commercially associated or not, should be treated as having equal value in Park Plans. This approach would reflect the general purpose section of the National Parks Act 1980 which provides that national parks are to be 'preserved...for their intrinsic worth and for the benefit, use, and enjoyment of the public...'. At no point in this general purpose section or in other parts of the Act is there a distinction between commercially supported and other users of

national parks. Previous park plans seem to have given preference to the experience of privately derived recreation. The Act however clearly envisages that the public at large share in the enjoyment and benefit of access to national parks. Both private and commercially derived recreation need to be equally provided for in order to give life to this intention for the optimum experience for all visitors.

Section One – The Plan’s function, structure and development process

Closer collaboration between DOC and TIA/Industry

13. The Plan states that decisions on the use of resources directly relevant to tourism industry operations are made in consultation with the appropriate industry body representatives. However, it is not always clear who these appropriate industry body representatives are and a consistent use of concepts is needed – at the moment the draft refers to businesses, recreational groups, TIA, tourism body representatives, commercial recreation providers, others, concessionaires, and other promotional groups.
14. TIA leads the development of the New Zealand Tourism Sustainability Commitment (TSC). The TSC aims to see every New Zealand tourism business committed to sustainability and has the vision of ‘Leading the World in Sustainable Tourism’. It was launched in November 2018 and to date has 750 members.
15. The TSC is based on a balanced-scorecard approach, with economic, host community, visitor and environmental goals. Supporting these goals, are 14 commitments which outline the actions that businesses can take to operate more sustainably. It is through the actions of many businesses that the overarching aim of a sustainable tourism industry will be achieved.
16. Many tourism businesses operating in National Parks have signed the Tourism Sustainability Commitment (TSC). TIA suggests that a TSC commitment is taken into account when assessing a business’s suitability to operate in a National Park.
17. Where the Plan refers to recreation, TIA is often not included in the consultation process. Any delineation between tourism and recreation is arbitrary. Recreation is part of the tourism sector (for all those recreating away from their home areas). The provisions of the Plan which relate to recreation (whether commercial or private) need to provide specific assurance that decisions will be made in accordance with consultation of appropriate industry body representatives including TIA. Reference to the DOC/TIA formal partnership agreement would ensure certainty in such provisions.
18. The Plan refers to a possible review of the conditions of the concessionaire system but does not specifically mention the need for industry consultation. It must be amended to include this.

Integrated Management Plans for National Parks

19. TIA considers that park plans should provide for the integrated management of national parks, particularly those which are adjacent or within close proximity to each other. Such provisions would emphasise the need for coordinated management of activities that cross administrative boundaries and a collaborative approach to management of national park resources. Natural and physical resources are interconnected within and

across parks and where parks share a boundary or are in close proximity, there can be multiple users, management entities and Kaitiaki involved in the administration of the relevant park plans. Integrated management would support quality visitor experiences, assist tourism operator business planning and enable more efficient park management and administration.

20. Integrated management also supports early identification of conflicting use issues and the provision of processes to resolve these. Additionally it helps to ensure that links between various resources (e.g. ecosystems, tracks and huts, air space, natural quiet, and landscapes) and the effects of activities associated with those resources are recognised and managed in a practical way.
21. TIA is pleased that DOC have developed the draft Westland Tai Poutini National Park Plan at the same time as this Plan and applied similar systemic changes to both. We strongly encourage this co-development approach with the upcoming drafting of the Aspiring and Fiordland Park Plans.
22. TIA supports the integrated approach taken in the Plan to protect the integrity of the Aoraki Mackenzie International Dark Sky Reserve as per Section 1.2.1 Policy 12 and Milestone 11.

The Vision

23. TIA generally supports the vision statement for the Park. We particularly endorse the focus on preservation of the Park's intrinsic values and on resilience, sustainability and responsiveness. We do however believe it lacks sufficient emphasis on the important role of the Park in enriching people's lives through outdoor recreation. It's only direct mention of visitors is focused on pressure; we believe this is a management issue and not suited to inclusion in the vision.

Positions:

- TIA recommends that the vision for the Park be amended to include reference to the important role of the Park in ensuring that the lives of New Zealanders and visitors are enriched by inspiring and enjoyable outdoor recreation experiences.
- TIA submits that the statement regarding pressures from visitors be removed and replaced with "...responding to changing hazards and opportunities from natural processes and visitors".

A more overt acknowledgment of conservation value and aims

24. TIA recommends that the purpose of our parks as defined in the National Park Act plays a more dominant role in setting the context for the Plan. The Act aims to preserve our highly valued natural places in perpetuity – for their intrinsic worth and for the benefit, use and enjoyment of the public. The detail within the Plan strongly supports conservation aims, however, TIA believes that the contextual statements should give

more weight to this point in order to better reflect our and the New Zealand public's conservation expectations.

Flexibility of the Plan, Milestones and Monitoring

25. TIA believes there should be a stated expectation that park plans will be amended during their lifetime. Many of the issues being experienced now are exacerbated due to DOC, operators and other interests trying to work with what have become untenable park plans. This includes important areas such as car-parking, hut management, trail development, aircraft landing numbers and sites.
26. The current paradigm seems to be that park plans are not expected to change and where change is required a partial park plan review can occur. However partial park plan reviews are a thing of theory and almost never occur. This sets up a totally unrealistic expectation that plans can incorporate the detail required to manage the park and also remain fit for purpose for ten years.
27. The milestone concept seems to be aiming to address this issue. However, TIA has concerns that it may not go far enough. The milestones seem sparse, particularly around recreational opportunities, and do not represent all the work required to achieve the objectives in a plan, which raises the question: will DOC focus on achieving the plan's objectives, or only on the milestones? It is also unclear what will happen if monitoring required in the milestones identifies a need to change something in a plan.
28. There are limits stated in the Plan. The Plan must also include objectives, policies and milestones to monitor, review and amend the limits as required to manage their real impact.
29. With more than 180 pages, the Plan is extensive and detailed. It would be useful if the proposed policies and milestones were collated in one place.

Positions

- TIA submits that in order to ensure that park plans meets their objectives, DOC commits to amending plans as required during their life time and that this is stated in this Plan itself.
- TIA submits that DOC ensure there is a fit for purpose change mechanism to amend plans, and that this includes consultation with key stakeholders including tourism operators, resourcing within DOC and responsive timelines.
- TIA supports the use of milestones and submits that:
 - The Plan clarifies how milestones will interact with the delivery of objectives and policies which they do not address.
 - The Plan includes many more milestones, particularly around supporting recreational opportunities and facilities - including in the backcountry.

- Milestones include the requirement to monitor and review any hard limits, and to amend the Plan in response to findings as relevant.
- TIA recommends that DOC collate the policies and milestones in one place in the Plan.

Telling the Tourism and Recreation Story

30. TIA supports the Plan's strong emphasis on the iwi story and connection with the Park. We do, however, note that the history and heritage of tourism and mountain recreation is not suitably told.

31. The Westland and Aoraki Parks were arguably the birthplace of activity-based recreational tourism in New Zealand. Guided mountaineering into the high alpine areas has an important and rich history. This history has very much shaped the use of the Parks today, and the deep connection of tourism and recreational stakeholders with the Park. The history of tourism and mountain recreation is deeply connected to these two Parks and should be integral to the context of the Plans and in the information available to visitors.

Positions

- TIA submits that the story of the Park's history and current context of tourism and mountain recreation be clearly told in the introduction and contextual sections of the Plan, including sections 1.2.2 and 1.2.3, and be a fundamental aspect of the Plan's value statements. Tourism operators and the New Zealand Mountain Guides Association must be consulted in the formation of this story.
- TIA submits that the Plan's objectives and resulting policies and milestones be re-assessed to suitably reflect the importance of this history and of the tourism and mountain recreation taking place in the Park today. A milestone must be included in section 1.2.2.

The role of Iwi in administering the Plan

32. TIA is pleased to see the Plan give life to Iwi's role as treaty partner in administering the Plan. The Plan should also acknowledge that Iwi may have a commercial interest in the Park and that where this occurs it must be given due regard in how Iwi fulfil their administrative role.

Acknowledging the important role of concessionaires in providing recreation experiences and connecting people to place

33. TIA is generally supportive of the objectives of Section 1.2.3. However we are concerned that they provide insufficient acknowledgement of the importance of concessionaire-provided outdoor experiences in the Park, particularly high alpine recreational activity.

34. The associated policies do not recognise or enable the role of concessionaires in achieving the objectives. Local businesses are mentioned, however not all concession businesses are locally based. Concessionaires are a critical part of ensuring that the lives of New Zealanders and our international visitors to Aoraki Mount Cook National Park are enriched by outdoor experiences. DOC is not the sole provider of these experiences, and nor should it be. The vast majority of visitors cannot interact with the Park without some degree of commercial support – most are either not technically skilled enough or not physically able to do so.
35. Commercially provided opportunities also present a strong tool for DOC to help manage safety and ensure people have valuable experiences in the Park.
36. By not sufficiently acknowledging the role of concessionaires in section 1.2.3, the Plan sets itself up for insufficient focus on this important enabler.

Positions

- TIA submits that the objectives in section 1.2.3 include a statement to support the importance of concessionaire-provided outdoor experiences and particularly high alpine recreational opportunities within the Park, and that policies and milestones are included to give life to this statement.
- TIA submits that the objectives in Section 1.2.3 should distinctly refer to the important role of concessionaires in supporting the outdoor recreation experience of visitors to the Park.
- TIA submits that the associated policies and milestones be adjusted to suitably enable the role of the concessionaires in achieving the objective.
- The Plan should include a specific objective of working to improve access and opportunities for concessionaires providing outdoor experiences.

Equally valuing the experience of self-supported and commercially-supported visitors

37. TIA acknowledges that the Plan generally works to equally manage the flow, experience and impact of visitors in the Park regardless of whether they are supported by concessionaires or not. This shows an important evolution in DOC's understanding of the visitor ecology and should result in plans being much more adept at achieving strong visitor outcomes for all stakeholders in national parks.
38. TIA notes that Appendix Two of the Plan (Page 163) states that "Concessionaire client activities should not be advantaged or disadvantaged compared with non-concessionaire visitors, unless there is a specified reason for different management". TIA endorses this statement.

Positions

- TIA strongly supports the Plan's approach to managing visitors as a whole rather than treating the experience of visitors supported by concessionaires as inherently less important than those who are not.
- TIA supports the above mentioned statement in Appendix Two and submits that it be included as a cornerstone statement in Section 1.2.3 Recreational Values.

Managing Restrictions and Limits

39. Any restrictions and limits placed to give effect to park plans should be formulated based upon sound evidence and be easily and consistently enforced and monitored. TIA considers that where prescriptive limits are set in the Plan, these must be based on sound and tested evidence to justify the need for such a limit.
40. A hard limit in a national park plan has the potential to become quickly outdated and therefore not provide for the purpose of the Plan. The use and enjoyment of resources is a matter which can change according to updated best practices, the nature of the resource, changing patterns of use and the finite capacity of the resource. Where hard limits are prescribed in a plan itself rather than by reference to an external limit, this can quickly become outdated and difficult to implement.
41. There is a balance to be struck between setting limits that provide certainty for users and operators and support for conservation aims, and having a framework that is responsive and adaptive to changes in the environment, expectations and use patterns, and increased knowledge and understanding.
42. TIA considers that where there is insufficient evidence to justify a hard limit for use of resources, the Plan should instead provide clear guiding principles, objectives and methods to establish a consistent framework under which decision makers can assess and provide for suitable uses. In those circumstances, the Plan should set the narrative objective for a site or area, and limits set adaptively outside of the Plan, to give effect to the set objective.
43. TIA is disappointed to see that hard limits remain included in the Aoraki Mount Cook National Park Plan and that we do not see any progress in outlining the evidence used to establish the limits - rather it seems they are solely based on current use levels.

Positions: TIA submits that:

- Each particular resource which is desired to be subject to a limit on its use be clearly identified for its particular aspects which require protection.
- Evidence is gathered which considers the particulars of the resource against the impacts of use of that resource, and that the nature of this evidence be communicated in the Plan.

- Where the evidence establishes a finite capacity of use of the resource, and that limit is justified by evidence and accepted by the community and decision makers, a limit be prescribed by reference in the Plan. A reference in the Plan to such limits provides an appropriate balance between certainty and flexibility so as to ensure that changes in the industry in the future can be provided for in the Plan without requiring full scale reform.
- Before implementing a limit in accordance with the finite capacity of a resource, regard must be had to other alternative options, including a preference for providing flexible limits which are determined according to guiding principles and policies.
- Where there is no reliable and tested evidence to establish a limit on use, specific principles and provisions should be established to give guidance to a decision maker and stakeholders to determine the appropriate level of use for the resource.
- DOC involve concessionaries and relevant recreational group in informing it's thinking on all aspects above.
- The above points pertain to all hard limits in the Plan regardless of whether TIA has otherwise submitted in support of a particular section or point in the Plan.

Managing Limited Supply Concession Allocation

44. Limited Supply Concession allocation requires careful and consistent management. It requires a balance between monopoly situations and ensuring that businesses are incentivised to invest and run quality operations. Many limited supply concessions involve large capital cost investment.
45. The draft Park Plans take an overly simplistic approach to allocating limited supply concessions. The suggested policy fails to address most of the serious risks involved – risks which pertain to DOC and businesses alike.
46. A Limited Supply Concession Agreement was signed by the Ministry of Tourism, DOC and TIA in August 2008. While the Agreement was developed over a decade ago, the issues it aimed to address still exist and many of its solutions remain valid. It should provide the basis for discussion of any limited supply allocation policy.

Positions

- TIA submits that the policy on allocating limited supply concessions be re-drafted to address the issues raised in the Ministry of Tourism, DOC, TIA Limited Supply Concession Agreement.
- TIA submits that the policy will be complex and will need to apply nationally, and that it is better suited to sit outside the Plan and be referenced by the Plan.

- The redrafting of the policy on allocating limited supply concessions must involve consultation with TIA.

Decisions on Concessions

47. The structure of the Plan should provide a reference to the general overview of the concession application and decision making process plus detail provisions that specifically relate to the National Park. The specific concession sections will provide detailed guidance to applicants and operators which are then supplemented by the DOC general concession process, which is publicly available. This will provide a good balance between detail provided in the Plan, and flexibility to update the general process which sits exterior to the Plan - but which is common to all documents.
48. This structure must be more explicit in the criteria and their weighting and what factors must be strictly complied with before concessions are granted in the National Park. A system of criteria like this is helpful to guide applicants through the process, but must be based upon reliable evidence.
49. The following criteria are provided as examples:
- a) Criteria for determining concessions must accord with the general purposes of relevant Acts, and include positive benefits of a proposal.
 - b) Criteria for determining concessions must include consideration of existing concessionaires, and cumulative effects based upon reliable data.
 - c) Criteria which prescribes what factors are appropriate to take into account when imposing conditions.
 - d) Criteria for achieving conservation gains.
50. TIA sees some evidence of this approach in the Plan, however it is still not consistent nor comprehensive. It is also important that where relevant, criteria is accompanied by a system of higher/lower weighting or which are 'absolutes' within each criteria itself.
51. TIA notes that one of the criteria in the Plan is 'operator experience'. We submit that this criteria should be removed as it appears to block new operators from being able to gain a concession in a national park.

Consistency with Industry Best Practice

52. Park plans should provide that industry best practice standards should be followed by park users rather than providing for duplicate standards. This will ensure consistency across a number of sectors operating within parks, and ensure that park plans have the necessary flexibility to adapt to industry changes and improvements. Industry best practice is often found in written guidelines or user group agreements, however where no such formalised structure exists for a particular area or activity park plans should refer to implementation of 'industry best practices' so as not to implement standards which might not otherwise have an evidential base. TIA is pleased to see the Plan reference external good practice standards in relation to Bolting within the Park.

Positions:

- TIA asks that reference be made in the Plan to the DOC safety and audit requirements to ensure there is no conflict with industry best practice or regulatory requirements.
- TIA supports Section 1.3.5.

Consideration of the risks of Climate Change and the Alpine Fault

53. TIA commends the Plan's recognition of the risk presented by both Climate Change and the Alpine Fault, and the efforts it makes to plan for their impact.

Acknowledging the importance that New Zealanders and our visitors are enriched by outdoor experiences.

54. TIA is pleased to see that the Plan recognises the importance of New Zealanders and our visitors being enriched by outdoor experiences.

55. We are particularly supportive of Section 1.2.3 however we note that the vast majority of policies do not have associated milestones.

Positions:

- TIA submits that milestones be added to Section 1.2.3 and recommends that DOC consider those in the draft Westland Tai Poutini Park Plan section 2.4.1.

The draft Plan development process

56. TIA acknowledges DOC's efforts to bring the Plan into a more current format and to respond to pre-draft submissions and the substantial contextual changes that have occurred since the last Plan was written.

57. This has necessarily resulted in substantive changes to the Plan structure and content, and to its management tools. Unfortunately there has been a lack of accompanying information from DOC on what has changed, why it has changed, how the changes interact, how they will be implemented and what they mean in terms of visitor experience and conservation outcomes in the Park. This has led to substantial confusion among our members and stakeholders.

58. There are several points in our submission asking DOC to further consult with tourism operators and stakeholders to ensure that changes in the Plan are meeting their visitation needs and conservation aims. TIA is aware that this will require resource and take time, however these points are not made lightly and come from our acute awareness of the importance of the Plan and the lack of understanding around the substantive changes.

59. DOC should have run an information process when the draft was released, including in depth discussion papers and engagement opportunities around the country. TIA does acknowledge DOC's response to our requests for more information on the management of air access. TIA asks that a thorough information process is run after the release of the upcoming Aspiring and Fiordland draft National Park Plans.

Positions

- TIA asks that DOC respond to TIA's requests throughout this submission for further engagement with tourism operators and stakeholders, including recreational groups.
- TIA asks DOC to prepare thorough information on all the request topics to ensure stakeholder understanding of the changes, how they interact (where relevant) and how they will be implemented.

Section Two – Feedback on Activity Management Proposals of the Plan

Use of the word 'safe'

60. The Plan often refers to the provision of 'safe' outdoor recreation opportunities e.g. 'identify, provide and manage a range of safe outdoor recreation opportunities'. TIA is a strong advocate for safe and quality experiences, however we are aware that 'safe' is a highly subjective term which relates very much to a particular context and visitor expectation. Its use as described here does not add value to the Plan, rather it could cause misleading expectations in decision makers and visitors alike.

Position:

- TIA asks that the use of the word 'safe' in the Plan is reviewed and adjusted to reflect the above feedback.

Park and Ride

61. TIA is supportive of the Park and Ride concept in principle and considers it an innovative tool to support management of what are now acute issues of visitor flow and parking congestion, and therefore the overall protection of natural values and visitor experience in the Park. As with any new venture there are risks. We have listed below some of the risks important to tourism operators that need to be addressed in the planning process:

- The requirement to park and ride may deter visitation to the National Park.
- There are potential barriers to access for concessionaires and recreational users such as climbers and trampers – all of whom have specific access requirements which are different to those of most day-use visitors to the parks.

- Coach schedules may not fit with itinerary/travel plans of Free Independent Travellers (FIT's).
- The domestic market, currently not familiar with paying for park and ride systems on DOC land could react poorly to the new system.
- Location of associated new parking or camping facilities may impact adversely on existing businesses such as accommodation providers and transport operators, on natural amenity values, and on the overall visitor experience.
- Costs (initial and on-going) associated with the infrastructure required and management of the facility.
- Lack of integration with visitor flow through the area and/or the value proposition of the region.

62. Areas to consider in planning for a Park and Ride system include:

A strong focus on impact analysis and mitigation, including consultation with concessionaires, other affected businesses, and recreational groups.

- Prioritising the support of relevant existing businesses wherever possible.
- Carefully consider whether 'parking areas' are for parking only or for overnight stays.
- Whether services should be public or private sector led.
- An integrated approach with relevant local and central government agencies.
- Identification of a sustainable funding mechanism.
- How will the service be provided and what process will support this? Including tender processes, the ability to scale up or down as demand requires, and provision to replace the provider if the service quality is not appropriate.

Position:

- TIA submits that DOC addresses the points raised above in its work to develop a Park and Ride system, and that this work includes consultation with tourism operators and recreational groups.
- TIA submits that Section 2.1.3 Milestones 9, 11 and 15 should all be brought forward to address the acute Village access and parking issues.

Paying for parking and/or park and ride facilities

63. TIA is aware that the costs of providing parking and transport services are significant. Fees for parking or transport can be used to help recover these costs and also as a tool to help manage visitor flow.
64. Currently the cost of providing parking areas inside our national parks is carried by DOC. Existing park and ride type services provided outside of public conservation land are run by private businesses who charge a fee for the service, such as at the Tongariro Alpine Crossing. TIA is not opposed to DOC charging for parking services.

Positions

- TIA is supportive of charging for parking and park and ride services, but not to the extent where it provides an unreasonable barrier to visiting the park. Charging for services is a long established part of our national park management system, hut and camp site fees being the most common examples, and it is particularly important that any fees are managed in a way that supports New Zealander's access to our national parks.
- TIA is supportive of differential pricing, however we acknowledge that this can be complex to administer. Differential pricing could apply to specific user groups such as concessionaires and climbing clubs, or between domestic and international visitors.
- The development of payment options must include consultation with affected parties including TIA, concessionaires and recreational user groups. Pricing should be tested on a trial basis, with results informing any final decisions.

Mount Cook Village

65. Mount Cook Village is exactly that, a Village. People live and have their homes in this place. It is important that the Village retains its community heart and does not become solely an amenity area for the Park.
66. TIA supports the Plan's use of a spatial plan to assist with understanding and managing the future use of the Village and front country areas in the Park. We also support that the management of the Village has regard for the context of the wider Te Manahuna/Mackenzie area.
67. TIA supports the Plan's aim to keep development within the current Village footprint until it is at capacity, at which time further development would occur outside the park.
68. We note that section 2.1.2 states that the village environment has a high level of tranquillity. TIA does not agree with this - the village is a busy place near to an existing

airport. We do, however, support the careful management of the DOC heli-pad in the village to minimise its impact on tranquillity.

69. TIA supports the inclusion of cycleways in the Village and adjacent areas.

Positions:

- TIA submits that Village planning and development must have regard for the sustainability of existing businesses, and for supporting appropriate private sector investment, particularly in accommodation offerings.
- TIA submits that concessionaries and businesses be specifically included in Village planning and development consultation processes and that a tourism business representative is included in the Design Assessment Panel.
- TIA submits that the Village development and planning processes give high priority to supporting the residential community.
- TIA submits that the important history of recreation and tourism in the Park be reflected in the Village design standards and guidelines.
- TIA submits that planning of vehicle access and movement within and to the Village must have regard for access requirements for recreational and concessionaire use of the Park.
- TIA submits that any changes involving negative impact on existing businesses in the Village are avoided where possible and mitigated when not, particularly with long lead in times to allow for businesses to plan for upcoming change.

Aircraft access – landing zones, daily limits, tranquillity aims, activity specific landing opportunities

70. Aircraft access has long been an integral part of the visitor experience in Aoraki Mount Cook National Park. The unique beauty of the mountains and glaciers means that scenic flights and snow/glacier landings are popular with those who are not technically skilled enough to otherwise interact with the mountains. Demand for these experiences is increasing and is likely to continue.

71. The scale of the landscape and the nature of the terrain is such that foot access is often difficult and the majority of recreational visitors also access the high alpine areas by air. This includes independent climbers, ski tours and guided and instructed groups. Climate change and resulting access challenges mean that this demand for air access is increasing and is likely to continue.

72. Aircraft use in the Park is a contentious topic. This is due to social impacts; predominately aircraft noise on other users, and secondarily the presence of mechanised access or people who have arrived via air in otherwise back-country areas. It is important to note that aircraft do not have a direct negative ecological impact on the flora or fauna of the Park.
73. It is important to manage these impacts and also to ensure that a range of visitor experiences can be had within the Park. Park plans cannot control airspace so restricting the number and location of aircraft landings has been the primary management tool. The restrictions have been driven by the outcomes of place based recreation/visitor management zones.
74. Concession agreements also contain management tools such as noise abatement requirements, aircraft size recommendations and mandatory membership of aircraft user groups. The user groups work with DOC to establish voluntary flight paths and other criteria that contribute to minimise impacts on other users of the parks.
75. TIA has long been supportive of the concept of aircraft landing limits and location restrictions, and of recreation/visitor management zones. TIA also works to support aircraft user groups and endorses their important role.
76. Safety is a critical factor in aircraft use and naturally enforces its own set of restrictions on aircraft access in the parks. Flight and landings in mountain areas is particularly challenging and operators and user groups work together with CAA and DOC on safety.
77. Aircraft businesses are capex-heavy and have very tight operational margins. In order to provide sustainable air access, park plans must enable viable business opportunities. Plans must include sufficient landing opportunities and be able to adapt to changing circumstances within their 10 year lifetime including the advent of quieter aircraft, longer term weather patterns, the nature of landing sites and shifting visitor demands.

Positions:

- TIA submits that we are specifically identified and included in consultation processes related to aircraft activity.
- TIA supports Section 1.3.3 policy 12.
- TIA submits that section 1.3.18 Milestone 7 include the review of allocated aircraft activity in light of monitoring results and note the potential to increase landings if effects are lower than the aims of the place. The Milestone should also include consulting on monitoring results with TIA and aircraft user groups.

Landing Zones

78. TIA is supportive of the shift from landing sites to landing zones. The small size and exact location of snow and ice landing sites has long been a safety concern for operators. The Park is a dynamic environment and pilots need to be able to adjust their landing location to stay safe. Crevasses open up, and slopes and surface conditions change. These changes are becoming more of an issue as the ice and snow fields recede.
79. TIA does have concerns that the exact size and boundaries of the proposed zones could have impacts on aircraft safety and on the visitor experience of other users of the Park, and that in some cases this could outweigh the value of the increased size of the zone. We consider that this may be the case for the extension of the aircraft landing zone into the upper areas of the Murchison Glacier. While aircraft access to Murchison Hut is appropriate, the rest of the upper Murchison Glacier is a highly valued relatively quiet back country area and is particularly utilised for ski touring.
80. Pilots have very concise and agreed 'routes' into and out of existing landing sites; this enables them to confidently predict where other aircraft will be. The size of the proposed zones and the resulting unpredictability of helicopter movements could present a safety risk and this must be carefully assessed and mitigated.
81. The current landing site model enables Park users to predict where they can expect to encounter aircraft and experience aircraft noise. They can then plan their experience in the Park around their desired level of interaction with aircraft. A risk of the proposed landing zone model is that it could make this difficult.
82. In some areas of the Park the level of existing/historical aircraft activity, particularly overflights, is such that a large landing zone does not have a significant impact - visitors would already expect to have higher levels of interaction with aircraft. Other areas of the Park have a low level of existing/historical aircraft activity. Visitors have traditionally gone to these areas for an experience which has relatively little interaction with aircraft. A broad landing zone model in these places, even if there are relatively low numbers of allocated landings, could make it challenging to predict where an aircraft will land and therefore to plan this kind of trip.

Positions

- Before new landing zones are operationalised, DOC must consult with aircraft user groups on the boundaries of the landing zones to ensure they enable acceptable levels of safety.
- DOC must consult with affected parties to ensure the size and location of proposed landing zones does not inadvertently impact opportunities for visitor experience with low levels of interaction with aircraft - particularly in areas which currently offer this experience and are highly valued by these user groups. Affected parties should include aircraft, guided mountaineering and heliski concessionaires, recreational groups and the NZ Mountain Guides Association.

- TIA doubts that extending the aircraft landing zone into the upper Murchison Glacier will provide an overall gain for recreational opportunities and visitor experience in the Park. We submit that DOC carefully consider submissions on this point, particularly from recreational groups and the New Zealand Mountain Guide Association.

Daily landing limits

83. Operators are currently allocated a number of landings per year in their concessions. This is known as an annual limit. Many operators currently use significantly less than their annual limit of landings. This is because daily landing opportunities in parks are limited by the weather which is often not suitable for flying, the number of helicopters which can fly and land safely in a given area, and the seasonality of visitor demand.
84. Moving to a model of allocating landings with daily limit constraints (beyond those which occur naturally) will adversely impact the viability of an aircraft business and could give a misleading impression of very high annual aircraft landing numbers.
85. Aircraft operators need to utilise their allocated landings when the weather and demand allows - daily limits will seriously impact the ability for an operator to run an economically sustainable business. A sustainable business is critical to providing high value visitor experiences and to meeting concession expectations around aircraft efficiency and noise management. Note that on days where the weather and demand enable flying, the landings in many places are already limited due to safety constraints.
86. We are also concerned that people could construe the number of landings in the Park per year to be a direct multiple of the daily limits. This gives a vastly inflated impression of the actual aircraft activity and makes it difficult for them to understand the real level of expected use. Aircraft access into our national parks is a sensitive issue and it is unhelpful to create a misleading picture of very high levels of use.
87. When speaking with recreational stakeholder groups, the impression is that the draft Plan represents a significant increase in landings. TIA's understanding, however, is that while there are new landing sites proposed and landing zones have been introduced, the number of landings in the draft Plan are based on current levels of use.

Positions

- TIA does not support the change from annual to daily aircraft landing limits and strongly advocates for the current annual allocation policy to be retained.
- TIA submits that the Department carefully considers and acts on the feedback from aircraft concessionaires, guided mountaineering operators and the New Zealand Mountain Guides Association on the landing limits for particular sites/zones.
- TIA submits that limits must enable sustainable aircraft operations.

Tranquillity Outcomes

88. TIA has long advocated for evidence-based limit settings, and particularly for aircraft landing limits. We applaud DOC's work to develop what we believe is a world leading tool to map soundscapes and develop tranquillity ratings. TIA and our members have worked alongside DOC throughout the development of the tranquillity rating tool.
89. The application of the tranquillity rating tool into park plans is, however, a substantive change in the way sound is managed in a park. It is our position that the actual application of a change of this importance in scale and impact should have been informed by considerable dialogue with stakeholders to ensure its workability. Although tourism operators were well informed on the development of the tranquillity rating tool itself, the engagement was not continued into how it is to be actually applied in the Park. The result is that there is considerable confusion among tourism stakeholders as to how the proposed tranquillity outcome zones will actually work. It is critical that aircraft access as described in park plans is structured in a way that gives operators confidence and certainty to be able to plan and invest in their businesses and product mix.
90. We assume that as part of managing an overall soundscape there is considerable connectivity between the various tranquillity zones so therefore cannot support any of the tranquillity outcomes/zones in their current form.
91. The concerns which have led to this position include:
- The tranquillity zones don't make practical sense e.g. Franz Josef Glacier – there is insufficient information to understand how aircraft can access the low tranquillity landing area (and utilise their concession landings) as it is completely surrounded by higher tranquillity zones.
 - Given that DOC does not have jurisdiction over activity in the air, it is not clear whether the tranquillity zones are a rule or a guidance for operators, and therefore what affect they will have on informing location of landing zones/sites, concession requirements and landing limits.
 - There is no information on what the various tranquillity ratings actually mean in terms of aircraft use. This leads to important questions such as: How many landings will trigger a different tranquillity outcome? Over what time period should a place meet its tranquillity aim; 50% of the time, all the time? How does the sound of overflights affect landing opportunities? How low does an overflight need to be before it affects an area's tranquillity rating?
 - It is very difficult to tell how the tranquillity outcomes interact with the visitor management zones, and whether one is subservient to the other. This means that we cannot tell what will actually drive decisions on landing locations and numbers.
 - If the tranquillity outcomes are intended to influence flight paths, have the consequences of altered flight paths been considered – factors such as safety,

efficiency of fuel usage, impact on other park users and viability in terms of weather?

92. There are already three zoning tools to signal management of aircraft in the Park; the visitor management zones, aircraft access zones and aircraft landing zones and sites.
93. TIA considers that while these three tools have some serious limitations, they are adequate to plan aircraft management in the Park. At this stage the Tranquillity Outcomes cause confusion and seem to add little to no value. It is important that the aircraft access zones stay well connected to the visitor management zones. Aircraft access is a highly valued way to access the Park and although sound impact is very important it is by no means the only thing to consider when allocating aircraft access.
94. The most fundamental limitation of the existing aircraft zoning tools is that they are not supported by objective evidence of the impact of aircraft noise. This means that current limits on landing numbers are almost entirely subjectively derived. The tranquillity rating tool measures sound against an objective scale. TIA strongly recommends that work on how to effectively implement the tool should be prioritised. It will add important evidence based rigour to this system, and should be extremely useful in helping describe sound outcomes within the aircraft access zones, for monitoring and measuring actual affect in these places, and to ensure that limits can be adjusted to reflect the reality of sound impacts.

Positions

- TIA supports the use of objective evidence to establish limits and accurately understand impact, both ecological and social, and therefore supports the concept of soundscapes and tranquillity modelling, and the science behind the tranquillity rating tool.
- TIA does not support the Tranquillity Outcome zones as presented in this Plan and submits that they are removed.
- TIA submits that the implementation of the tranquillity rating tool into the Plan needs significant further thought and testing, and that this process must include working alongside aircraft operators to ensure any outcomes proposed for the Plan makes practical sense.
- TIA submits that the above work should be prioritised. It will add important evidence-based rigour to setting aircraft use limits in the Park, enable limits to reflect the reality of sound impacts in specific places, and enable evidence based changes to limits as circumstances change through the life of the Plan. These outcomes are all critical to supporting sustainable air access in our national parks.

Activity specific landings

95. The draft Plan and its associated aircraft topic paper have largely removed the link between aircraft landings and a certain activity occurring on the ground. It is TIA's understanding that the current Plan does not do this and largely specifies aircraft landings with an associated activity use.
96. The impact of an aircraft landing itself is not related to the purpose of the occupants once they land. In this regard the proposed change makes sense. Activity specified landings can also inadvertently shut out other recreational groups from accessing areas that are important to them.
97. There are, however, potential negative consequences of making non-activity specific landings the default setting. An area which was designated for landings for climbing or ski-touring could now involve sightseers. This may impact significantly on the experience of climbers who valued that place as a remote and important climb, whereas it may not provide the same degree of value to sightseers who could have had a similar experience elsewhere in the Park. Also a limited landing opportunity that is vital for undertaking an activity which cannot occur elsewhere in the Park may be used up by other recreationalists who could have used other landing sites.

Positions:

- Whether or not a landing is activity specific can have a strong effect on the recreational use of an area. Park plans should contain both activity specified and non-specified landing sites – depending on what achieves the best visitation outcomes for the area and for the Park as a whole.
- TIA submits that DOC carefully consider feedback from tourism businesses and recreational stakeholders when deciding whether the landing opportunities in the Plan should be activity specific or not, and adjusts the Plan accordingly.

Accessing backcountry huts and climbing areas

98. TIA is pleased to see the Plan proactively addressing the need to maintain access to backcountry huts and climbing areas. Securing access to these destinations is critical to support high alpine recreation in the Park. Aircraft landings may often be the only way to address access requirements, however TIA is aware that in some cases ground access can be secured by installing wires and other fixed means of support.
99. Where an area is not otherwise already subject to aircraft noise TIA supports the exploration of ground based access options as a first priority, but where this is not practicable air access should be provided.

Positions:

- TIA supports the Grand Plateau landing zone.
- TIA recommends that DOC explore whether ground based access be secured to the area of the old Gardiner Hut site. If this is not practicable we support the Pudding Rock landing zone.
- TIA supports the landing sites at Onslow and Liebig Huts, and at Liebig Dome.
- TIA submits that DOC's planning for accessing backcountry huts and climbing areas be informed by alpine guiding concessionaires, the New Zealand Mountain Guides Association and recreational groups.

Supporting front country recreational experiences

100. TIA commends the Plan's inclusion of several new front country experiences. Front country recreational opportunities are particularly important in the Park as most visitors do not venture into the back country areas.

Positions:

- TIA submits in support of all new front country experiences noted in the Plan.

The lack of ambition in regards to supporting backcountry recreational opportunity.

101. The Plan plays a justifiably significant amount of attention to managing and enabling front country short-stay visitation but, with the exception of enabling access to back country huts, it lacks ambition for enabling backcountry recreational use. This lack of ambition does not align well with the high recreational value offered by the Park, or with the importance of enabling sustainable recreation by the increasing numbers of domestic and international people visiting the Park.

Positions:

- TIA submits that the Plan should articulate a commitment to the importance and continued use of existing high alpine huts, including Tasman and Kelman huts, and that Section 1.3.1 policy 13 a) iv) be adjusted to suit.
- TIA submits that Section 1.3.1 policy 13 includes taking into account the importance of high alpine guiding and instruction activities in the Park, and that consultation statements include concessionaires and recreational groups.

- TIA submits that milestones with regard to new back country recreational opportunities and facilities be brought forward to earlier in the life of the Plan.
- TIA submits that DOC pay careful attention to submissions on the above matters including any requests for development of tracks, huts and other back country recreational opportunities and facilities.
- TIA supports DOC taking a partnership approach to maintaining and improving back country hut facilities.

Additions to the Park

102. TIA supports the additions to the Park as per Section 1.3.2.
103. TIA submits that when establishing the management of these new places DOC consults with stakeholders in these places to ensure that existing recreational opportunity is well understood and accounted for.

Including Concessionaires in conservation work and pest control

104. TIA is pleased to see that the Plan includes concessionaires in its statements about working with others on conservation efforts and pest control.

The use of E-Bikes and Mountain Bikes in the Park

105. TIA supports the inclusion of e-bikes and mountain bikes as a means of recreation in the Park. These are important and popular forms of recreation which enable a wide range of people to gain enjoyment from and establish connection with the Park. TIA believes they can be used on both designated and shared trails if well managed.

Limits on Alpine Guiding

106. TIA is very concerned about and does not support section 1.3.10. We support the submission from Adventure Consultants Ltd which states "Guiding has been part of the history at Aoraki Mt Cook for a long time and that guiding history is celebrated. Use of guides encourages safety and respect and protection for the environment. If we had only one group per concessionaire as this policy promotes the guiding industry would be destroyed. Existing limitations on guided concessions are sufficient and appropriate."
107. We are also concerned at the impact on the alpine guiding sector of the proposed limits for guiding in the Murchison Glacier and Liebig Hut areas as stated in section 2.4.3 Policy 1 a).

Positions:

- TIA submits that section 1.3.10 policy 1 c) be removed and that this is vitally important for the continued existence of the alpine guiding industry. TIA believes that existing limitations on guided concessions are sufficient and appropriate.
- TIA supports the submission of the New Zealand Mountain Guides Association on Section 2.4.3 policy 1 a).

Management of huts in the Park

108. Well informed and resourced management of huts in the Park is critical to both visitor safety and quality experiences. The backcountry hut network is particularly important to the connection of New Zealanders to the park and to guided alpine opportunities.
109. Section 1.3.1 policy 27 requires no more than 50% of available bunk space in a hut to be occupied by visitors there on a guiding concession. TIA supports the view of the New Zealand Mountain Guides Association that that this policy is not necessary as hut use is well managed, particularly in the high alpine huts.
110. Recommendations on Section 1.2.3 policy 10 should be considered on a hut by hut basis and take into account the reality of gains versus additional work for DOC. While some huts could benefit from a booking system, many are well supported by DOC's current system of letting visitors know hut occupancy rates.
111. There are existing huts and lodges in the park which are owned by clubs or concessionaries. The Plan proposes several changes to the way these are managed. These facilities offer important support to recreational users, and often have historical significance to these groups. Decisions which affect these facilities must include careful consultation with the owners, recreational user groups and where relevant with concessionaries.

Positions:

- TIA submits that Policy 27 in Section 1.3.1 be removed.
- TIA submits that Section 1.2.3 policy 10 be re-worded to reflect the implementation of this policy includes consultation with alpine guiding concessionaires, the New Zealand Mountain Guides Association and recreational groups.
- TIA submits that Section 1.3.1 policy 14 and 16 be amended to recognise the importance of these facilities to their current owners and to include consultation on decisions with the owners, recreational user groups and where relevant concessionaries.

- TIA supports Section 2.2.3 milestone 1 to re-establish Hooker Hut in Hooker Valley as an overnight bookable facility.
- TIA submits that the re-establishment of Murchison Hut be included in the policies and milestones of the Plan.
- Recommend a specific policy to be included in section 2.3 Haupapa area for the investigation of redevelopment of the Tasman Neve huts.
- TIA supports the submission from the New Zealand Mountain Guides Association on Section 2.2.3, Policies 9b-e.

Mandatory shut down of aircraft on landing

112. TIA believes that the requirements in the Plan that aircraft shut down on landing goes against industry good practice and could be unsafe. We understand that aircraft user groups already voluntarily expect aircraft to shut down on landing where safe and practicable.

Positions:

- TIA submits that all references in the Plan for aircraft to shut down on landing be removed.
- TIA recommends that DOC continue to work with aircraft user groups to support agreements where operators shut down their machines to manage noise impact on other users whenever safe and practicable to do so.

Structures, utilities and facilities that support outdoor recreation experiences

113. The Plan should better recognise the importance of structures, utilities and facilities in supporting outdoor recreation experiences in the Park, and should have regard for this when assessing applications to build, create or retain these things.

Positions:

- TIA submits that Section 1.3.14 policy 2 a) includes whether the activity promotes or enhances outdoor experiences.
- TIA submits that Section 1.3.1 policy 9 be amended to include consultation with the New Zealand Mountain Guides Association and relevant concessionaires.
- TIA submits that Section 1.3.14 policy 4 include the requirement that decisions to remove or relocate existing facilities related to outdoor experiences are made in consultation with relevant recreational groups, the New Zealand Mountain Guides Association and concessionaires.

Wild and Game Animals

114. TIA submits that the New Zealand Professional Hunting Guides Association is identified as a stakeholder in Section 1.3.17 policies 1, 4 and 5.

Follow up process

115. TIA wishes to participate further in any follow-up process, including any formal meetings or hearings, to ensure that the potential impacts on tourism are adequately represented.

Background

116. Tourism for New Zealand is big business as the country's largest export sector. It 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. 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 and pure offering 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.

117. While it is New Zealand's number one export earner, the visitor economy is in fact dominated (60%) by domestic tourism. New Zealanders visiting other parts of New Zealand are a critical part of the tourism industry.

118. Tourism industry key facts:

KEY FACTS
<ul style="list-style-type: none">• Tourism in New Zealand is a \$107 million per day industry. Tourism delivers around \$44 million in foreign exchange to the New Zealand economy each day of the year. Domestic tourism contributes another \$63 million in economic activity every day.• Tourism is New Zealand's biggest export earner, contributing \$16.2 billion or 20.6% of New Zealand's foreign exchange earnings (year ended March 2018).• 13.5% of the total number of people employed in New Zealand work directly or indirectly in tourism. That means 365,316 people are working in the visitor economy.• The Tourism 2025 growth framework has a goal of growing total tourism revenue to \$41 billion a year by 2025.
Visit www.tia.org.nz for more information