

TIA Pre-consultation Feedback

Bay Of Plenty Conservation Management Strategy

Tēnā koutou

Tourism Industry Aotearoa (TIA) would like to provide the Department of Conservation (DOC) with the following pre-consultation feedback on the Bay of Plenty Conservation Management Strategy. Over the last year, we have provided feedback on the Wellington Conservation Strategy and on the pre-draft stage of several DOC National Park Plans including Aoraki/ Mount Cook National Park Management Plan review and Westland Tai Poutini National Park Management Plan review.

Background Tourism Industry Aotearoa and Conservation

1. Tourism Industry Aotearoa partners with DOC in order to enhance conservation outcomes alongside promoting and supporting the growth of tourism.
2. TIA's goal is that the Conservation Management Strategies (**CMS**) improve the opportunities for domestic and international visitors to have access to positive outdoor experiences that will contribute to their overall visitor experience and individual well-being and to the resilience of local communities and tourism operators.
3. TIA seeks to ensure that the CMS provides for the preservation and protection of the natural environment of public conservation areas, whilst allowing improved and enhanced use and enjoyment for recreation and commercial users of these areas.
4. The Conservation Act 1987 (the **Act**) sets out the purpose of conservation management strategies (section 17D(1)):

The purpose of a conservation management strategy is to implement general policies and establish objectives for the integrated management of natural and historic resources, including any species, managed by the Department... for recreation, tourism and other conservation purposes.

5. The Act also enables one of the Functions of DOC "to foster the use of natural and historic resources for recreation, and to allow their use for tourism" to the extent that use is not inconsistent with its conservation goals. Accordingly, the CMS needs to align and provide for tourism and conservation concurrently.
6. Recreational visitors to public conservation areas are made up of a number of different groups; these include commercially paying visitors and self-guided visitors. TIA considers that all such users should have the benefit of experiencing public conservation land and should therefore be treated as having equal value in planning documents. Private and commercially derived recreation needs to be

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explicitly and equally provided for, to manage for the optimum experience for all visitors.

7. The management of conservation areas and natural and historic resources is to be carried out by DOC in accordance with conservation management strategies, among other instruments identified in section 17A of the Act. The importance of emphasising the direct link between conservation and tourism within the CMS must be underlined therefore, helping both TIA and DOC to achieve their coordinated recreation and tourism goals.
8. Tourism operators provide significant and multiple benefits to public conservation areas in the form of engagement of people with natural places, concession fees, ongoing donations, enhancement and protection of the natural environment, education benefits, and infrastructure development. Diverse use of the infrastructure within conservation areas should be encouraged and the maintenance of safe, quality visitor experiences supported by careful management and monitoring of conflict between different user groups.
9. In July 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 optimised the vision and principles between the two organisations, plus identified a set of specific goals and actions under the banner of [Project Groundswell](#). TIA is now currently working closely with DOC as they develop their visitor experience strategy. TIA sees the strategy as an opportunity for DOC to establish an internal approach to managing visitors that is coherent, streamlined and aligned with that of other government departments and the tourism industry's Tourism 2025 framework. With the new DOC Visitor Strategy scheduled for adoption in 2017, all future CMS documents should reflect its vision and principles.
10. An ongoing close partnership between DOC and TIA will help enable the importance of preservation of natural resources and the ability for sustainable growth and innovation of tourism operations in public conservation areas to be better catered for and kept front of mind. TIA considers that enabling visitors to enjoy and access public conservation areas 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.
11. Integrated management across CMS boundaries and recognition of TIA as a conservation partner would also assist with business planning and enable DOC to ensure it complies with its responsibilities in terms of oversight of conservation area use, including supporting a quality visitor experience for all recreational users of those areas. It can also be supportive of early identification of conflicting use issues, and the provision of processes to resolve these. Integrated management policies would ensure that links between various resources (e.g. ecosystems, tracks and huts, aircraft landing zones, natural quiet, and landscapes) and the effects of activities associated with those resources are recognised and managed in an integrated way. TIA supports consistency in terminology, application, and general policies across all CMS documents administered wherever possible.
12. Provisions of the CMS should provide for the needs of the entire community of conservation area users, including iwi, visitors, tourism operators, researchers, and education, etc.

13. Provisions of the CMS should also provide sufficient flexibility to cover future innovation and technology that may impact public conservation areas. Currently draft CMS's are restrictive in their approach, and consideration must be made to allow CMS's to encompass the impact of future innovation and technological advances.

General comments on the Bay of Plenty CMS

We would like to raise the following points on features of Conservation Management Strategies that are important to TIA, our members and the wider tourism industry.

14. TIA truly believes that conservation and tourism can be managed in a way to benefit both. Where people are enabled to experience a natural conservation environment, they in turn become educated and connected to that place. This supports a sense of ownership, responsibility, and understanding for the values of conservation for such places. The key priorities of working with DOC to promote tourism and visitor experience through the CMS are to:
 - a) Collaborate closely between DOC and TIA internal strategies and strategic plans so as to share, combine, and promote tourism / conservation priorities;
 - b) Improve access to and opportunities of public conservation land for tourism operators through more responsive CMS provisions;
 - c) Achieve a consistent and transparent concession application and renewal process which provides certainty for stakeholders;
 - d) Ensure that limits on use of resources are only 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 alternatives are considered to support tourism growth;
 - e) Implement effective monitoring and enforcement systems; and
 - f) Ensure CMS requirements are consistent with tourism industry best practice standards, including aligning with user group agreements and written best practice standards where relevant.

Prescriptive limits

15. TIA considers that where prescriptive limits are set out in the CMS, these must be based upon sound and tested evidence to justify the need for such a limit.
16. Limits should be contained in appendices to the CMS, or other extraneous material, with a clear directive that limits are subject to change depending on the most relevant and current information available. It must be clear that limits can change outside of the set CMS review period.
17. TIA requests the evidence upon which the limits are based, and adequate opportunity to consult with our members on this evidence.

Lack of consideration to future innovation and technology

18. TIA is concerned about the lack of consideration to future innovation and technology in CMS's and any restrictive approach taken here. For example, ten years previously there would have been no consideration for electric-power assisted pedal cycle. The CMS needs to provide the flexibility to cover future innovations and technology that may exist in ten years' time, and have an impact on conservation areas.

Key agency

19. TIA requests that if there are any references to tourism in the CMS (e.g. increasing visitor numbers), TIA to be included as a key agency for DOC to work alongside.

New private accommodation and related facilities

20. TIA acknowledges that private facilities can have the potential to impact adversely on public use and enjoyment of conservation lands, however TIA also recognises that some private facilities can also enhance overall public access by enabling some resource users to access these areas.
21. Any policies around new private facilities need to provide flexibility for considering when such new facilities might be appropriate and under what circumstances.

Consultation

22. Public consultation for CMS's is important. The CMS will have a substantial impact on people living, working, and visiting the CMS region. Providing viewing opportunities at DOC offices and a copy of the draft online does not constitute proper nor sufficient consultation for a plan that will have significant impact on the general public, and will be in operation for the next decade.
23. We suggest that DOC initiates public meetings or workshops in the impacted region and utilising media such as local newspapers to give the general public the opportunity to submit on the CMS.
24. This will also be consistent with the recommendation in the Conservation Boards Review that boards should invest more time in building relationships, seeking community views and feeding information back to communities of interest.

Tourism Context - Bay of Plenty Conservancy

25. The following information provides some key facts about tourism, and aims to highlight the importance of tourism to New Zealand and specifically the importance of tourism to the Bay of Plenty Conservancy.

National

- Tourism, New Zealand's largest export earner, is a vital contributor to New Zealand's economic and social wellbeing, generating wealth and support jobs in communities around the country.
- As well as visitor expenditure, visitors contribute income to the Government through GST, the border levy, petrol tax and the income taxes paid by the 188,000 people directly employed in tourism, and the company taxes paid by the thousands of businesses servicing visitors.
- Total tourism expenditure reached \$34.7 billion in the year ended March 2016, up 12.2% on the previous year. International tourism expenditure reached \$14.5 billion (YE March '16), up 19.6% on the previous year. Domestic tourism expenditure reached \$20.2 billion (YE March '16), up 7.4% on the previous year.

Bay of Plenty Regional Tourism Organisation (RTO)

The Bay of Plenty RTO comprises of Mt Maunganui, Tauranga, Papamoa, Whakatane, Waihi Beach, Katikati, Ohope and Te Puke.

- In 2017 (YE May '17), total tourism spend (both domestic and international tourism spend) in RTO Bay of Plenty was \$814 million, up from \$767 million in 2016.¹
- There were 1,223,861 guest nights in the RTO Bay of Plenty in 2017 (YE May '17). This included 316,013 international guest night and 907,848 domestic guest nights.²
- The Domestic Growth Insight Tool (DGIT)³ shows that there are a potential 4,828,832 domestic trips to the Bay of Plenty region, incl. 2,871,752 potential day trips. This includes:
 - 125,970 potential domestic trips focused on environmental or conservation activity
 - 455,911 potential domestic trips focused on visiting a national park
 - 562,938 potential domestic trips focused on other natural attractions (e.g. mountain, lake, river etc)
 - 61,894 potential domestic trips focused on visiting a place that is significant to Maori, such as a landmark, remains of a Maori pa, etc
 - 422,210 potential domestic trips to see wildlife in their natural environment

26. This data clearly shows the importance of tourism to the Bay of Plenty region and the connection with DOC land. This reinforces our view that provisions of the CMS should provide for the needs of the entire community of conservation area users, including iwi, visitors and tourism operators.

Next Steps

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

The table below sets out additional, consequential, or alternative relief in order to achieve the objectives and reasons provided by TIA. These points are consistent with TIA's feedback on other CMS. Although these comments might not be fully applicable to the BOP CMS, we do think it is useful for the BOP CMS team to consider.

Thank you for providing TIA with the opportunity to provide feedback on this proposal. Please do not hesitate to contact me for more information or clarification of the above.

Ngā mihi,



Steve Hanrahan
Advocacy Manager **Tourism Industry Aotearoa**

¹ Source: MBIE, Tourism data, Tourism Dashboard, Visitor spend by region – as sourced from https://mbienz.shinyapps.io/tourism_dashboard_prod/

² Source: MBIE, Tourism data, Commercial Accommodation Monitor, May 2017, RTO Bay of Plenty – as sourced from <http://www.mbie.govt.nz/info-services/sectors-industries/tourism/tourism-research-data/commercial-accommodation-monitor/current-month-rto-reports/north-island-regional-reports/Bay-of-Plenty.pdf>

³ Source: Activating Domestic Tourism – as sourced from <http://dgit.nz/>

TIA – specific submissions on draft CMS provisions

CMS Section	CMS Section	Submission - support or oppose and reasons	Decision Sought
Recreation and Access Policies and Milestones			
	Recreation background - Recognises public access issues to reserves scattered throughout the CMS surrounded by private land, and private land that adjoins some Forest Parks. DOC intends to work with PSGEs and tangata whenua, Land Information New Zealand, New Zealand Walking Access Commission, local authorities, other agencies, and landowners to resolve these access issues.	TIA supports the identification of conservation access issues to assist with increasing visitor interaction with these destinations. Visitors tend not to distinguish between different landowners; they are simply looking for a great experience.	Amend Recreation background section to include TIA as a key agency for DOC to work alongside. "DOC intends to work with PSGEs and tangata whenua, Land Information New Zealand, New Zealand Walking Access Commission, <u>Tourism Industry Aotearoa</u> , local authorities, other agencies, and landowners to resolve these access issues".
	Identify and provide outdoor recreation opportunities where: a) they are consistent with: i) the protection of natural, historic, and cultural values; and ii) the purposes for which the lands and waters concerned are held; and c) demand is evident and expected to be maintained.	TIA supports the recognition of the importance of providing for recreation opportunities; however this positive recognition should not be contingent upon demand for a resource being evident and expected to be maintained. There may be many instances in which it is appropriate to recognise and provide for new or alternative recreation opportunities where demand has not yet been proven or established.	Amend policy by deleting "(c)" or by recognising that <u>existing</u> recreation opportunities should be encouraged to consolidate, develop, and grow, where demand is evidenced and expected to be maintained.
	Work with the New Zealand Walking Access Commission to achieve priorities for improved access to public conservation lands and waters for recreation, and to enhance public access to the coastal margin, lakes and rivers.	TIA supports the identification of conservation access issues to assist with increasing visitor interaction with these destinations. Given that DOC's associated milestones are about increasing visitor numbers (i.e. a form of tourism), TIA considers it is important to have a tourism industry representative expressly recognised as a key partner.	Amend policy to include TIA as a key agency for DOC to work alongside
	Identified public conservation lands and waters requiring access improvement by end of year three.	TIA supports the identification of required access improvements on conservation areas. Improved access will improve tourism operation throughout the CMS region, and work towards DOC and TIA coordinated goals.	Retain Milestone

CMS Section	CMS Section	Submission - support or oppose and reasons	Decision Sought
	Initiated processes to improve access to public conservation lands and waters, in conjunction with the New Zealand Walking Access Commission, PSGEs and tangata whenua and conservation partners by year five.	TIA supports improved access to public conservation areas.	Amend Milestone to include TIA as a key agency for DOC to work alongside. TIA also seeks clarification as to who other potential 'conservation partners' are.
	By the end of year ten, access will be improved to public conservation lands and waters.	TIA supports improved access to public conservation areas.	Retain Milestone – suggest increased clarification as to what level 'improvement' is desired to be achieved.
	PSGEs, tangata whenua, user groups, and others help to maintain all the huts in the CMS region (by end of ten year period).	<p>TIA supports hut maintenance throughout the CMS region, however questions the accuracy and identification of these milestones. There is no supporting objective for these milestones, and therefore it is unclear what end is desired to be achieved, and why.</p> <p>It is unclear whether having all user groups 'help' to maintain all huts in the future is meant to intend that those user groups are the only parties responsible for such maintenance, or the sole parties responsible.</p>	Retain milestone but clarify its application and associated objective. TIA would like recognition of tourism as a user group that should have the ability to inform hut maintenance priorities.
	Provided a full range of recreational opportunities to all visitors to public conservation lands and waters in the CMS region.	TIA supports increasing and recognising importance of a full range of recreation opportunities.	Retain Milestone
Engagement Policies and Milestones			
	Work with concessionaires and other businesses to enhance the conservation experience of their customers and others.	TIA supports recognising concessionaires as having a role in conservation and engagement.	Ensure this policy applies to both existing concessionaires and those applying for concessions.
	Work with regional tourism organisations, other promotional groups, and businesses to create and develop opportunities to promote conservation initiatives, products, and services.	TIA supports recognition of tourism and conservation / engagement being complementary.	Add in TIA as an organisation to connect with in order to achieve this policy.

CMS Section	CMS Section	Submission - support or oppose and reasons	Decision Sought
General Regional policies			
	Encourage people and businesses undertaking activities on public conservation lands and waters to comply with activity-specific minimum impact codes (care codes) as notified from time to time on the Department's website.	TIA supports the use of minimum impact codes; however this must work alongside industry good practice.	<p>Amend wording: 'Encourage people and businesses undertaking activities on public conservation lands and waters to comply with activity specific minimum impact codes (care codes), as notified from time to time on the Departments website, as well as industry good practice.'</p> <p>TIA support retaining flexibility in implementation of codes of practice by retaining this material external to the CMS, and not subject to the CMS review cycle.</p>
	Aircraft policies	<p>TIA considers that where prescriptive limits are set out in the CMS, these must be based upon sound and tested evidence to justify the need for such a limit.</p> <p>Limits should be contained in appendices to the CMS, or other extraneous material, with a clear directive that limits are subject to change depending on the most relevant and current information available. It must be clear that limits can change outside of the set CMS review period.</p> <p>If retained in the CMS, TIA requests the evidence upon which the limits are based, and adequate opportunity to consult with their members on this evidence.</p> <p>If any information is provided at a later date, TIA reserves the right to comment further. If the Department have no further information, TIA has concerns about the lack of evidential basis on which these limits have been</p>	<p>Amend specific limits (i.e. in numeric terms) to be converted into appendices, or referred to as extraneous material to the CMS.</p> <p>Provide clear directive that limits are subject to change at any time subject to current information.</p> <p>Department to provide the evidence upon which the limits have been established.</p> <p>Where no or insufficient evidential basis exists, limit to be removed.</p>

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		established.	
	Commercial filming and photography, and sporting and other competitive events	<p>TIA recognises these activities are of particular importance to be recognised in terms of concession and authorisation requirements, however there are other more general activities requiring concessions.</p> <p>TIA request clarification as to whether this also includes the use of drones for marketing activities- refer above general submission on 'Future proofing' required with consideration of developing technology.</p>	<p>Add in a general recognition of other types of recreation / visitor experiences which may require concessions.</p> <p>Clarification required to establish what this policy includes e.g. the use of drones.</p>
	Should not authorise new private accommodation and related facilities, including encampments, on public conservation lands and waters.	<p>TIA acknowledges that private facilities can have the potential to impact adversely on public use and enjoyment of conservation lands, however TIA also recognises that some private facilities can also enhance overall public access by enabling some resource users to access these areas.</p> <p>TIA considers this policy prescribes a hard bottom line which is potentially inconsistent with the remaining policies of public access and does not allow any flexibility to consider when such applications might be appropriate.</p>	TIA requests that this policy be deleted, or otherwise re-drafted to provide flexibility for considering when such new facilities might be appropriate and under what circumstances.
	May authorise the erection or retention of structures, utilities and facilities or the adaptive re-use of existing structures, utilities and facilities on public conservation lands and waters where the activity promotes or enhances the retention of a historic structure, utility or facility.	TIA supports retention and re-use of historic structures and facilities.	Add in recognition of public enjoyment, maintaining access options, and recreation opportunities which result from re-use and retention of such facilities.
	Advocate to aviation controllers and aircraft operators to manage flight paths to avoid adverse effects on public conservation lands and water.	TIA supports the mitigation of adverse effects, however opposes the wording of "avoid adverse effects on public conservation lands and water". TIA recommends an amendment to this wording to recognise flight paths should be	Amend policy 5.2.9 to: "Advocate to aviation controllers and aircraft operators to manage flight paths to avoid adverse effects on other users of public conservation lands and water."

CMS Section	CMS Section	Submission - support or oppose and reasons	Decision Sought
		managed to avoid adverse effects on other users of public land.	
Authorisation tables			
	Fixed limits on aircraft landings in prescribed conservation units.	<p>TIA considers that where prescriptive limits are set out in the CMS, these must be based upon sound and tested evidence to justify the need for such a limit.</p> <p>Limits should be contained in appendices to the CMS, or other extraneous material, with a clear directive that limits are subject to change depending on the most relevant and current information available. It must be clear limits can change outside of the set CMS review period.</p> <p>If retained in the CMS, TIA requests the evidence upon which the limits are based, and adequate opportunity to consult with their members on this evidence.</p> <p>If any information is provided at a later date, TIA reserves the right to comment further. If the Department have no further information, TIA has concerns about the lack of evidential basis on which these limits have been established.</p>	<p>Remove table from CMS body and convert into an appendix, or other extraneous material.</p> <p>Provide clear directive that limits are subject to change at any time subject to current information.</p> <p>Department to provide the evidence upon which the limits have been established.</p> <p>Where no or insufficient evidential basis exists, limit to be removed.</p>
	Fixed limits on motor vehicle, electric-power assisted pedal cycle and mountain bike access in prescribed places throughout the CMS region.	<p>TIA considers that where prescriptive limits are set out in the CMS, these must be based upon sound and tested evidence to justify the need for such a limit.</p> <p>Limits should be contained in appendices to the CMS, or other extraneous material, with a clear directive that limits are subject to change depending on the most relevant and current information available. It must be clear limits</p>	<p>Remove table from CMS body and convert into an appendix, or other extraneous material.</p> <p>Provide clear directive that limits are subject to change at any time subject to current information.</p> <p>Department to provide the evidence upon which the limits have been</p>

CMS Section	CMS Section	Submission - support or oppose and reasons	Decision Sought
		<p>can change outside of the set CMS review period.</p> <p>If retained in the CMS, TIA requests the evidence upon which the limits are based, and adequate opportunity to consult with their members on this evidence.</p> <p>If any information is provided at a later date TIA reserve the right to comment further. If the Department have no further information, TIA has concerns about the lack of evidential basis on which these limits have been established.</p>	<p>established.</p> <p>Where no or insufficient evidential basis exists, limit to be removed.</p>
	<p>Fixed limits on motor vehicle, electric-power assisted pedal cycle and mountain bike access in prescribed places throughout the CMS region.</p>	<p>TIA is concerned about the restrictive approach taken here, and throughout the CMS, with lack of consideration to future innovation and technology.</p> <p>For example, ten years previously there would have been no consideration for electric-power assisted pedal cycle. The CMS needs to provide the flexibility to cover future innovations and technology that may exist in ten years' time, and have an impact on conservation areas.</p>	<p>Suggest that a clause or provision is added into the CMS providing flexibility to consider future technology.</p>
Part Two - Places			
Monitoring and Enforcement			
	<p>Report, at least annually, to the region's Conservation Board on progress in achieving the milestones in this CMS, as a means of monitoring its implementation.</p> <p>Report, at least annually, to the region's Conservation Board on changes, additions, and updates to content, information and supporting links on the region's CMS website.</p>	<p>TIA supports having prescribed annual reporting requirements which require assessment against CMS objectives, policies and milestones. TIA considers that these policies would benefit from a check and balance system which requires public accessibility to reports, and feedback from the Board on progress against the CMS to ensure accountability.</p>	<p>Amend these policies to clarify these will be made publicly available. Ensure policies require that such reports clearly identify where milestones are not being achieved, and include reasons for why these are not being achieved, and what actions are to be implemented to remedy this.</p>

CMS Section	CMS Section	Submission - support or oppose and reasons	Decision Sought
Appendix Icon and Gateway destinations			
	Recreation opportunities on public conservation lands and waters have been categorised into four different destination types (Icon, Gateway, Local Treasure and Backcountry) to reflect known and potential demand, and to capture people's outdoor leisure preferences. This is part of an approach known as Destination Management.	<p>TIA supports the use of nationally consistent principles and terminology across all DOC policy and planning documentation, so long as consistency provides for a simple and pragmatic approach.</p> <p>The four classifications provided (Icon, Gateway, Local Treasure and Backcountry) are unclear in their application based upon the provided definition, and it is unclear how these relate to other place definitions, such as 'backcountry' and 'frontcountry'.</p>	<p>Remove classifications; or</p> <p>If classifications are retained, provide clear definitions within the CMS itself (not just the glossary) so users are provided with a clear understanding of what each classification means, and what objectives and policies relates to each.</p> <p>Define the principles for these categorisations within the CMS.</p>
Appendix			
	Preferred maximum party size	<p>TIA requests evidence on which the limits of party sizes are based. If there is no evidential basis for the limit, a limit should not be imposed. Where there is sufficient evidential basis, this should be clarified within the CMS.</p> <p>There should be a clear directive that limits can change at any time based on relevant and current information, not just during the CMS review period.</p>	<p>Provide evidential basis for limits.</p> <p>Remove limits that have little or no evidential basis.</p> <p>Retain limit where there is evidential basis.</p> <p>Provide clear directive that limits can change at any time based on current and relevant information.</p>
	Aircraft management	TIA opposes the wording "Aircraft access for visitor use purpose should not be approved other than in accordance with...". This presupposes a negative decision.	Amend wording" Aircraft access for visitor use purposes should be approved when they are in accordance with..."
DOC Stretch Goals and Priorities			
Stretch Goals and Priorities	<p>Stretch goals and priorities identify DOC's 50 year vision for conservation in New Zealand.</p> <p>Freshwater: 50 freshwater ecosystems are restored from 'mountains to the sea'.</p>	TIA supports the overarching DOC stretch goal for the restoration of 50 freshwater ecosystems from 'mountains to the sea'. However, TIA is unable to comment about whether the CMS approach is sufficient in the national context, as the 50 waterways are not identified in the CMS.	Suggest that the 50 waterways DOC seeks to restore are specifically identified.

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		TIA seeks assurance that the CMS supports <i>Te Mana o te Wai</i> values and the improvement of the overall quality of waterways in the CMS region that are important to recreational users.	
	Recreational access/land use	<p>DOC needs to check that their models for recreational access/land use and supporting categorisations are correct. DOC needs to be clear on what constitutes the New Zealand public (age mix, urbanisation, recreational habits etc) and international visitors.</p> <p>Do New Zealand public and international visitors recreate the same way? In an increasingly urban and ageing population, and with increasing international visitor numbers, is DOCs current model still useful?</p>	<p>Suggest DOC consult with TIA to ensure their model is correct and current.</p> <p>TIA would like to participate in any discussions on this topic.</p>

