International Visitor Access Charging Consultation

Tourism Industry Aotearoa's Submission to the Department of Conservation

July 2026

SUBMISSION

Kia ora

International Visitor Access Charging Consultation: TIA Submission

Tourism Industry Aotearoa welcomes the opportunity to submit on the Department of Conservation's International Visitor Access Charging consultation.

TIA has been heavily engaged in the current conservation reform programme, including submitting on the Conservation (Amendment) Bill and we are currently preparing our submission on the draft National Conservation Policy Statement.

TIA Position

TIA's submission on the Conservation Amendment Bill made the following recommendation relating to access charging for international visitors:

> **Access levy.** We support the ability being established to levy international visitors at certain sites. We see issues around how this will be implemented that need to be resolved, and we are concerned at the wording for how funds raised will be utilised. We propose wording to require funds to be used '*...at the place where they are raised and without substituting existing funding from the Department*.'

The full access charging wording of our submission is set out as Attachment 2. These ideas inform the feedback we set out in this submission.

TIA Consultation Feedback

The consultation material provides a framework for considering the key issues. We have set out responses in Attachment 1. From this, we have developed a strategic overview that DOC needs to consider and act on. We see the necessity for a National Visitor Site Pricing Strategy where the critical high-level matters are identified and addressed. Without such a strategy, there is risk of inconsistent and piecemeal decision-making and outcomes.

1. Why A Pricing Strategy Matters

- **Without a strategy, site-by-site pricing decisions risk being wrong in both directions**. A charge set too high can suppress visitation to a site and the gateway town or regional economy built around it. A charge set too low fails to address the pressure it was introduced to manage. A national strategy will provide individual pricing decisions a consistent logic to sit within.
- **Predictability of visitor cost**. Tourism businesses typically price and sell packages 12 to 18 months ahead of travel. International visitors budget a total trip cost before they book. A charge introduced with little notice, or one that varies unpredictably in method and size from site to site, makes the visitor experience harder to navigate.
- **Reinvestment must be demonstrable at place**. TIA has previously submitted, in relation to the Conservation Amendment Bill, that charging

visitors for access to high-visitation sites is supported only where revenue is reinvested in the places it is raised from and that it is addition to existing Departmental funding, rather than as a substitute for it.

The visitor needs to feel like the charge is value for money and need to see there are amenities and maintenance undertaken that are worth paying for. A national strategy is where this principle should be stated once, and applied consistently, rather than negotiated site by site.

- **New Zealand already applies an International Visitor Levy.** Additional site-specific charges, introduced without reference to existing levies and charges, risk a cumulative visitor cost burden that no single process is responsible for assessing. A pricing strategy is the appropriate place to hold this whole-of-system view.
- **A strategy also enables pricing to be considered more holistically.** Differentiated pricing, for example by season, can support regional dispersal, boost shoulder-season demand, and to ease pressure points. This kind of differentiation is difficult to justify or implement consistently without a strategy to sit within.

2. Principles TIA Recommends for the Pricing Strategy

A National Visitor Site Pricing Strategy to include the following principles:

- **Hypothecation**. Revenue collected at a site is reinvested in that site or immediate vicinity for tourism and conservation, with this being additional to existing Departmental funding, not in substitution for it.
- **Transparency**. A published rationale for what each charge funds, the clear methodology for how the amount was set, funds raised and how it is allocated.
- **Genuine consultation**. Tourism operators, iwi, and local communities are consulted before a charge is introduced, and at defined review points thereafter, rather than being notified after the decision is made.
- **Consistency of method**. A single framework is applied across all sites, so that operators and visitors can predict how new charges will be approached, even where actual amounts differ from site to site.
- **Adequate lead time**. A minimum notice period applies before any charge is implemented or changed, sufficient to respect existing booking cycles. TIA recommends a minimum of 12 months.
- **System-level coordination**. Site pricing is considered alongside the International Visitor Levy and any other visitor charges such as parking, so that the cumulative visitor cost burden is assessed as a whole, not only in parts.
- ***A dispersal lens***. The strategy explicitly enables differentiated pricing to drive regional and/or seasonal dispersal and demand-shifting outcomes.

- **Built-in review**. Charges are reviewed on a set cycle against visitation, site condition, and cost recovery data, rather than set once and left unexamined.
- **Low compliance friction**. Charging mechanisms are straightforward to integrate into existing booking and payment systems, so that administrative burden does not fall disproportionately on tourism operators where they may be required to be the collection agents.
- **Long term**. A pricing strategy will lock in long term planning and investment by all parties, including DOC and tourism interests.
- **Value for money**. The charges need to be considered value for money by the visitor and that being demonstrated not only through the area visited, but through the quality of the amenities and maintenance provided.
- **Substitution**. International visitor charges should not be used to cover all maintenance that is needed due to the total volume of users, including from domestic visitors. Across the country, 60% of tourism spend is from New Zealanders, so the charge needs to reflect usage from international visitors only.

3. What a Pricing Strategy will Contain

The Pricing Strategy will provide the framework and guiding principles that will allow the next tier of decisions to be taken, including collection methods, the framework for setting prices, exemption and waivers, compliance and enforcement, reporting, and criterial for selecting sites. Our views on these matters are set out in our response to the consultation questions.

Conclusion

TIA is looking for a practical and fair approach for charging international visitors for access to key conservation/visitation places. Visitors globally regularly pay to access special places and will do so in New Zealand for a quality experience. Our obligation is to establish this with smooth and transparent systems that will improve both tourism and conservation, and this dual benefit is the overarching interest that we hold.

TIA recommends a strategic approach is used, with a National Visitor Site Pricing Strategy to be developed with this to inform all subsequent operational decision-making and actions. For any questions, please contact Bruce Bassett - 021 609 674 or bruce.bassett@tia.org.nz.

Ngā mihi,

R Ingram

Rebecca Ingram
Chief Executive

Attachment 1: TIA Responses to Consultation Questions

Question	TIA Response
Do you have any feedback about whether these sites are an appropriate place to charge for access? **Are there any other sites the Government should consider charging for access to?**	TIA supports DOC being provided with the ability to charge international visitors for access to a number of our key conservation places. This will ensure DOC has the ability to reinvest at those places for tourism and conservation gains. TIA is most interested in the design and principles that will establish a viable and fair access charging system. Based on our understanding, the four sites appear logical places to start. At this stage, we do not have suggestions for additional sites. It also highlights the practical complexity involved with each site. Clearly detailed policy work is required to address these complexities, and we welcome DOC getting the process underway ahead of the Bill being passed.
What principles should underpin the rate? **Effectiveness, reasonableness, transparency.**	The principles will be critical to the enduring success of the system. Generally, effectiveness, reasonableness and transparency provide a base framework. TIA has been considering options for funding mechanisms across tourism and some of the principles we have been considering may map over to the access charging context: • National approach for equity, efficiency, and sustainability, while allowing for site differences. • All funds raised are used solely for additional tourism purposes. • All funds raised prioritised to the place where funds are raised. • Developed with robust understanding of where the costs and benefits of tourism lie. • Efficient to operate with low impost on those providing and collecting the levy. • Enduring and consistently applied to allow for long-term planning and execution. • Operated with clear objectives, accountability and transparency on how funds are governed and allocated. • To be seen in context of other charges paid by international visitors, and concessionaires on their behalf. TIA would be happy to further discuss the basic design at the principled level. Another high-level consideration lies with the examination of other options. For instance, charging will be inherently difficult, particularly around how to collect – a pay booth, on-line, a one-off National Park pass, built into concessions, make it part of parking or transport fees, etc. Will voluntary options be looked at? It could be that as much revenue could be gained through such means, particularly if the collection methodology is simpler and costs lower. In some form, the matter of compliance and enforcement will need to be addressed, and it is not clear what is intended in this area.

Question	TIA Response
What input should be used to calculate the rate?	There does need to be a pricing strategy in place on the matter of charges. It is very important that this is a wide examination that covers the context of people's travel and the other charges they may be subject to. For instance, at Cathedral Cove, an individual visitor could be subject to paid parking, transfer charge to the cove, and then an access charge. There are concession charges that are passed on to visitors. And this is on top of paying for the IVL which is cited as being for facilities they will enjoy in our country. This 'package' of charges is important. We know DOC is aware of this, but it needs to be thoroughly considered. TIA submits that an important part of the pricing strategy will be sensitivity or elasticity analysis, with this likely needing to be site-specific. Understanding site specific sensitivities will ultimately determine the price level at each site and will allow the appropriate approach. For instance, it may be a better strategy to develop the park and ride facilities to generate the needed income.
What discounts, exemptions and waivers should there be? **Who should get an exemption?** **When should waivers apply?** **How can we keep the system simple while still being fair?**	TIA sees complexity on this question, firstly in differentiating NZers from international visitors on a practical and non-intrusive basis. Then there is separating international visitors who should or should not be subject to the charge. The consultation document cites international scientists or international delegates to be exempt. To this we would add international visitors in New Zealand working for tourism businesses (many or most of whom won't have NZ residency), or international visitors doing voluntary conservation work. There will be other such groups. Conceptually, TIA supports dynamic pricing, or other approaches such as seasonal or multi-park passes. And these may offer opportunities for efficiency gains, such as for an annual pass or a National Park pass where visitors pay once for access to all the sites on their holiday. Having flexibility around operational waivers is conceptually supported, within the context of the effectiveness and complexity of the overall system.
What could the money be spent on?	Funds raised must be reinvested at place to either improve the visitor experience, health and safety, and necessary infrastructure investment and maintenance. A bottom line for TIA is if the funds are integrated into DOC general budget for use elsewhere or if the funds are used to top-up reduce baseline funding at those places. The funds must strictly be used for 'additionality' and provide value for money for the visitor.

Question	TIA Response
Where should the money be spent? **What is important to you when you think about what makes up the 'visitor experience?'** **Are there any particular investment priorities you can think of?**	As stated above it is critical the funds are used at place for the upkeep, maintenance and development of the place in which they are raised by international visitors. The revenue raised should not be to such a level that it accounts for cost stemming from domestic visitors. The Milford Sound area is a clear example of why and how access charging will make a fundamental difference for the management, development and restoration of this iconic destination. The Milford Opportunity Project has a long-term strategy and plan in place and is lacking only the ability to invest to drive implementation of that plan. In terms of the four Priorities cited, TIA's views are: 1. Cover the cost of the charge. Agreed, but this raises the point about the 'cost to collect' and whether this is viable. If the cost is too high the mechanism may not be viable, and that should always be a test that is applied. 2. Maintain and improve the site where the charge is collected. Agreed, and TIA sees this as the primary recipient of funding provided it also relates to international visitor usage 3. Improve other visitor experiences in the region. Partially agreed. This would be a secondary objective once the main site is in good order and strategies may be needed to develop alternative destinations, etc. 4. Support the maintenance of visitor experiences across the wider national network. No. For TIA this would be licence for slippage of the funds from its core purpose. Aspects of the visitor experience include safety and comfort, interpretation and signage, capital management, a person to guide or explain, quality facilities, toilets, access to food and beverage, etc. DOC is not responsible for all these aspects, with tourism concessionaires often being the providers, with this being a key part of how our conservation places are operated for tourism activity.
What are the potential collection mechanisms?	As set out above, there are multiple collection mechanisms to be considered. Another aspect is how visitor packages sold through inbound travel operators will incorporate the access charges where they apply to their clients. The packages are often sold well ahead of time making short term integration of new charges difficult to apply without a reasonable notice period.

Attachment 2: Access Charging section from TIA Submission on the Conservation Amendment Bill

Below is the visitor levy section of TIA's submission on the Conservation Amendment Bill. You can get the full submission here: www.tia.org.nz/assets/Uploads/TIA_Submission_ConservationAmendmentBill.pdf

International Visitor Access Levy

TIA supports the provision of the ability to DOC to charge international visitors for access to some conservation land, noting that regulations will be established to put in place the levies.
TIA's Member Survey showed that 96% of respondents support international visitor access charging to generate additional investment in conservation and visitor experiences, with clarity needed on operation of the charge, definition of an international visitor and that the funds raised will supplement, not replace, existing Crown funding for DOC.

Not all of TIA's members hold this view and we direct the Committee to the submission of the Tourism Export Council on behalf of their members.

Gaining revenue streams from visitors will allow DOC to invest in the destination to improve the experience over time.

In establishing this levy, there are many factors to consider. For instance, is it a payment point when entering a place, is it built into the package provided by tourism operators and how will international visitors be identified?
Integrating this access charge into the complex tourism distribution system will need careful design and industry input. Tourism itineraries can be quoted and sold years out, making additional costs difficult to include retrospectively. A notice period of at least 18 months is required to implement this transition smoothly.

TIA strongly believes that funds raised must be invested in place where the funds are raised to support the improvement of that place for visitors (both facilities and conservation). Critically, this must fund additional activities and not just replace reduced DOC funding.

TIA is concerned about cumulative charges for visitors where they may pay multiple access and parking charges. For instance, an individual visitor to our country could face several charging points:

- $100 International Visitor Conservation and Tourism Levy
- Carparking at certain sites
- Inbound tour operator concession fee (passed on to the visitor)
- Transport operator concession fee (passed on to the visitor)
- Activity provider concession fee (passed on to the visitor)
- Plus, the proposed access fee.

With the access fee adding to these charges, the industry holds a legitimate concern that the cumulative costs risk reaching a tipping point that outprices the value proposition for international visitors. If this happens, the wider consequence for tourism and national economy is likely to be greater than the funds raised. Solid pricing and demand elasticity work for each site where charging will be introduced is needed.

The definition of an international visitor as a person who is not a NZ citizen or ordinarily resident in New Zealand may not be sufficient. For instance, international volunteers carrying out conservation on the PCL or employees of tourism companies. These international visitors must be exempt.

TIA supports the Bill's requirement for DOC to consult concession-holders before regulations for levies are made.

If operators are required to be the point of collection for the access levy, the cost of doing this will need to be included in the design of the levy system.

Recommendation 9:

To amend the section relating to the purpose of the levy as set out below.

> S48D(2) The purpose of the levies is to fund, or contribute to the funding of -
>
> (a) additional activities that maintain and enhance visitor experiences on land managed and administered by the Department at the place where the funds were raised and without substituting existing funding from the Department; and
>
> (b) collecting the levies.

This will serve to ensure the investment of funds raised in the appropriate places and that they will not substitute existing funding and thereby will not lead to increased investment.