

National Conservation Policy Statement

Tourism Industry Aotearoa's Submission
to the Department of Conservation

August 2026

SUBMISSION



Kia ora

Proposal Document: National Conservation Policy Statement - TIA Submission

Tourism Industry Aotearoa welcomes the opportunity to submit on the proposal document: National Conservation Policy Statement (NCPS) that is being prepared as part of the reforms of the conservation management system.

This submission comments on the establishment of the NCPS while recognising the Conservation Amendment Bill (Bill) has not been passed and will not do so this side of the election. This is important for the NCPS in that changes being called for the Bill will, if accepted, impact the NCPS itself. Essentially, some of the areas we cover in this submission may change. This will require flexibility and further consultation once the legislation is finalised.

We also note that the consultation material sets out the content or wire-frame of the first NCPS rather than it being a complete document. We request engagement is undertaken at all steps to prepare its final comprehensive form.

Overall Position

TIA supports the process to establish the NCPS that will be the critical strategic document for decades to come. While we appreciate that the NCPS will be easier to change than preceding strategic documents, it is important that it is very well developed on commencement.

TIA views the draft NCPS as being partial at this stage, with considerable additional work needed to make it a complete draft document for further consultation.

Based on the draft NCPS provided, TIA makes the following recommendations:

1. Further public consultation on the draft NCPS once the Conservation Amendment Bill is finalised and passed into law.
2. Ensure the NCPS sets out all the policies applicable to the wider purpose and functions of the Department as defined in legislation.
3. Review the policy statements to ensure they are coherent and internally consistent and cover all the purposes specified in the Bill (e.g. conservation, biodiversity, tourism, recreation, education).
4. The NCPS to clearly include all aspects of the streamlined processes of the Bill, particularly those that apply to complex concession holders.
5. Strengthen the NCPS's Area Plan provisions by requiring all Area Plans to explicitly address tourism and DOC's enabling economic functions.
6. Amend the NCPS to appropriately include tourism treatment within Visitor Zones, including outside of the High Visitor Zone, and Visitor Amenities Areas to accommodate cross-zone tourism activities within the prescribed areas.
7. Review the NCPS provisions for filming and photography with a view to establish 'low impact promotional media activity' as an exempt activity.

8. Investigate the pre-approved concession framework to ensure the system provides operational certainty for all operators and other stakeholders to ensure high-quality visitor experiences and effective conservation management.
9. DOC to review the specific tourism activities to be supported by policies beyond the current policy for accommodation.

TIA would be pleased to discuss this feedback and to work with DOC to develop the NCPS.

Tourism Industry Aotearoa

TIA is the peak body for the tourism industry in Aotearoa New Zealand. With around 1,200 member businesses, TIA represents a range of tourism-related activities including hospitality, accommodation, adventure activities, attractions, retail, airports and airlines, transport, as well as related-tourism services.

TIA is sharply focused on ensuring the balanced growth of the industry as articulated in the tourism industry's strategic framework, [Tourism 2050](#) – A Blueprint for Impact, He Pae Tukutuku. This has the Vision of 'Enriching Aotearoa New Zealand through a flourishing tourism ecosystem'.

Tourism 2050 has just ten Actions that are the most important strategic workstreams to advance to enable the industry to achieve its Vision. Action 7 is 'Transform Tourism and Conservation' which is focussed on 1) optimising the current settings and 2) supporting steps to modernise the complex conservation settings.

As such, TIA strongly supports the programme to modernise conservation settings and commends all of those involved in advancing this progressive agenda. This is highly aligned to the values of TIA where we see tourism as a positive contributor to conservation and care of nature across our country.

TIA is therefore doing all we can to ensure the reforms are designed and implemented and affectively as they can be for the mutual benefit of tourism and conservation. This is the spirit in which we make this submission and will contribute any further input into the reform process.

New Zealand Tourism Industry

Tourism is a major part of the New Zealand economy. It makes up 7.7% of GDP, 12.4% of employment and 17.0% of exports. Total visitor expenditure in the year to March 2025 was \$46.6b, comprising \$18.1b of international tourism and \$28.5b of domestic tourism.

At one-sixth of New Zealand's export economy, it is important we get it right in terms of optimising the returns that tourism can generate for our country, whether through jobs created, business opportunities, tax revenues for Government (estimated to be \$10.5b annually), not to mention the contributions that tourism makes to conservation.

Our nature and landscapes are a key driver of visitation to New Zealand, providing the motivation for 47.6% of our visitor. 72.5% of international visitors took a walk, hike, trek or tramp while in New Zealand. The places that people visit and activities they undertake is central to who we are as a visitor destination. Caring for these places is a fundamental requirement for all New Zealanders, and particularly the tourism industry.

General Feedback

TIA welcomes the reform of the conservation legislative framework and is committing to support its successful development and implementation.

We submitted to the Draft National Conservation Policy Statement in August 2025 and Conservation Amendment Bill in July 2026. Both contain input that impacts on how we consider the current NCPS consultation. For instance, in our:

- **2025 NCPS submission**, we called for the NCPS to be 'complete' in covering all the functions of the Department of Conservation (the Department or DOC) once the Bill is passed into law, including the primacy of conservation and biodiversity. The NCPS is the peak strategic document that sits under the Act, meaning that it must set out all key DOC functions established by the Act, including conservation and biodiversity, as well as tourism and recreation.
- **2026 Conservation Amendment Bill submission**, we supported the streamlined management planning framework and welcomed the place of tourism as a mandated function, along with other functions. We noted the role of the NCPS to provide more detail on how the Act will be applied, served to generate more questions that need addresses to provide assurance that the various functions will operate as intended.

Key points made include:

- That a tourism-related section 6 function statement should enable tourism 'to the extent consistent with conservation'.
- Clarity needed on how processes will work for existing concessionaire who need certainty and surety of tenure to enable support development and investment.
- Further consideration needed on how pre-approved concessions will work in practice.
- Decision making powers require further consideration, including the roles of the Conservation Authority and Conservation Boards.
- Recognised the role of Area Plans in the new conservation management system, and that tourism to be specified as a sectoral component of the Area Plans.
- Supported the concept of Visitor Amenities Areas as a means to appropriately develop a small number of key tourism areas, with an open process involving tourism industry engagement and input required as to their development.
- Supported the upholding of Treaty obligations in the Bill and its implementation over time.
- Income from any access levy to be used at the place where it is raised and without substituting existing funding from the Department.
- The definition of 'international visitor' needs further work to exclude visitors employed by tourism businesses or doing volunteer conservation work.

Some of these points may change in the final legislation and therefore how these points are to be expressed in the NCPS.

Recommendation 1: TIA highly recommends that there be a subsequent process for formal public input into a draft comprehensive NCPS after the Conservation Amendment Bill is finalised and passed into law. This will ensure that the draft full NCPS is advanced in accordance with the final form of the empowering legislation.

TIA Feedback

TIA has responded to the consultation questions (refer Attachment 1) and provides some overall feedback:

Overall Observations

- **Scope of the NCPS.** The NCPS must reflect all the functions of the Department as defined in legislation. TIA welcomes the tourism-related aspects being included but these need to sit alongside the other functions of DOC, particularly its primary conservation and biodiversity functions.

As the peak strategic planning instrument for DOC, the NCPS must reflect this holistic nature of the function of DOC, and its role in enabling a wide range of activities. The wording in Policies 1-4 on page 10 may provide for this, but it is not clear to the lay-reader, and it should be.

Other aspects of the Bill must be better reflected in the NCPS. In particular, the Bill's economic development thread that is not reflected in the draft NCPS and which needs to be appropriately referenced.

Recommendation 2: Ensure the NCPS sets out all the policies applicable to the wider purpose and functions of the Department as defined in legislation, along with other key aspects of the Bill such as economic development.

- **NCPS wording.** The consultation document, as worded, provides the 'Policies' in blue text. When read in isolation, it is difficult to discern what is intended. This may be because the document sets out the 'content' of the NCPS and so does not contain all the detail to be covered or the explanation of it to assist interpretation.

A couple of examples where we noticed policies that seemed incomplete:

- In the Area Plans 'values, threats and pressures' section on page 11 (Policies 10-15), there is no reference to tourism or recreation values meaning that these will not be able to cascade to Areas Plans as intended.
- In the Area Plans 'objectives' section on page 12, is unclear what it means for tourism. It refers to recreation and visitor zones (Policy 16, 19 and 20) but it is not clear what is meant by this.
- Tourism objectives need to be established in Area Plans so must be included in this section of the NCPS, and we recommend an express policy be included around enabling tourism.

The policy statements as described are using legal language and would benefit from being expressed in plain English.

Recommendation 3: Review the policy statements to ensure they are coherent and internally consistent and cover all the purposes specified in the Bill (e.g. conservation, biodiversity, tourism, recreation, education), specifically a policy statement enabling tourism should be incorporated.

- **Process improvement for complex concessions.** The draft NCPS sets out some steps for streamlining processes (e.g. exempt and pre-approved activities, terms and conditions) but is silent on how complex concessions will be handled and streamlined.

We estimate that this will constitute around 60% of all concessions and most of the large operators. It is these concessions that will provide the longer-term arrangements that are central to business surety and ability to invest. Aspects in the Bill such as statutory timeframes and use of standard forms will assist, but they are not specified in the NCPS itself.

The big picture change we are seeking is a concession system that enables commercial tourism activity and investment to enable tourism to a high standard in our conservation lands and waters that, in turn, generates value for DOC and operators, and boosts conservation. This includes our large complex concession holders who may not be seeing how the streamlined aspects of the Bill will benefit their operations.

Recommendation 4: The NCPS to include all aspects of the streamlined processes of the Bill, with focus on the area where greatest gains can be achieved, that is, with increasing efficiencies and timeframes for complex concession holders. TIA considers that the NCPS must explain how the streamlined concession process will be implemented across all concession types, not only exempt, pre-approved and standardised pre-assessed activities.

Consultation Points

- **Area Plans.** Area Plans will be a pivotal part of the new planning framework in shaping downstream decisions from Visitor Zones and Visitor Amenities Areas.

The Area Plans are likely to cover large and diverse areas with varied conservation and visitor needs. TIA considers that the draft NCPS does not adequately reflect the Bill's economic development focus. While conservation must remain DOC's primary focus, the NCPS should also be enabling appropriate economic development including from tourism.

TIA supports removing arbitrary activity limits from Area Plans to improve flexibility but emphasises that DOC will require appropriate tools and capability to manage changing visitor demand. The NCPS should clearly specify DOC's management powers, including the use of regulations and bylaws, and explain how these will be applied to both individual operators and to manage and mitigate cumulative impacts.

Stronger provisions for monitoring, data collection and responsive management are also needed. TIA seeks greater transparency in how tourism activities and concession processes will be managed and seeks mandatory industry consultation in the process to prepare all Area Plans.

Recommendation 5: Strengthen the NCPS's Area Plan provisions by requiring all Area Plans to explicitly address tourism and DOC's enabling economic function, clearly define DOC's visitor management powers and monitoring framework, and mandate consultation with the tourism industry during plan development.

- **Visitor Zones.** TIA supports the introduction of Visitor Zones to manage visitation while protecting conservation values, particularly in high-use front-country locations.

The zoning framework should help direct visitor and environmental management in the places where it is most needed. However, while TIA supports the express reference to tourism in relation to the High Visitor Zone, many tourism activities, such as multi-day tramps, cycle trails, aviation, four-wheel drive tours and alpine experiences, will often operate across multiple Visitor Zones. The NCPS should ensure that such cross-zone tourism and recreation activities are considered and provided for in Area Plan and Visitor Zone design.

TIA also supports Visitor Amenities Areas as a means of enabling strategic spatial planning and well-managed investment in visitor infrastructure. Greater detail is needed on how these areas will be established, governed and reviewed over time. TIA seeks stronger guidance in the NCPS on the purpose and operation of the Visitor Amenities Areas and for tourism to be a mandatory consultation partner in their development and operation.

Recommendation 6: Amend the NCPS to appropriately include tourism within Visitor Zones, including outside of the High Visitor Zone, and Visitor Amenities Areas, require consideration and provision for cross-zone tourism activities within Area Plans and Visitor Zone design, and mandate tourism industry consultation in the development and ongoing management of these planning mechanisms.

- **Exempt activities.** TIA supports the introduction of a category of exempt activities but does not see them making much difference for tourism operators.

The 'news of the day filming or photography' exemption does raise questions around how filming activity is covered by the concession framework. The pre-approved filming elements are also narrow in what they involve (filming or photography projects), and how they will need to be undertaken (refer Appendix 3). The activities do not reflect the filming needs of tourism, that by default, will therefore require full concessions.

Given that handheld digital filming is now a ubiquitous part of tourism for personal record, social media and product marketing, the proposed framework risks being impractical and quickly outdated. Consideration must be given to this area to ensure low-impact routine filming activities are treated appropriately and ideally classified within the set of exempt activities.

Recommendation 7: DOC to review the NCPS provisions for filming and photography to establish routine and low-impact tourism social media and promotional filming, described as 'low impact promotional media activity' as an exempt activity (refer number 7 in Attachment 1 for draft wording).

- **Pre-approved activities.** TIA welcomes the proposed pre-approved activities category to simplify concession processes for low-impact tourism activities.

However, fuller consideration of the proposal raises significant operational and implementation issues that require further clarification, including:

- How pre-approved concessions will interact with existing concessions including coordinating activities.
- The implications of shorter tenure for investment certainty.
- Incentives for current concession holders to transition to the new system.

- Access to huts and other visitor infrastructure (bookable and non-bookable)
- How pre-approved concessions will work in limited-supply situations.
- Ability to deliver consistent visitor experiences.
- What are the bylaws, regulations and conditions that will govern pre-approved activities, including safety plans, public liability insurance, and others.
- What data will be available to enable DOC to manage these concessions.
- What displacement of recreation activities may occur and how will this be managed.

These questions reflect TIA's concern about how activity limits, carrying capacity and visitor quality will be managed, particularly at high-use locations, and whether DOC will have the tools and agility to respond to pressures that will emerge.

Overall, while the streamlined approach has merit, TIA considers that the framework requires substantially more detail to provide confidence for operators, visitors, other stakeholders (such as recreational users) and DOC itself

Recommendation 8: DOC to further investigate the pre-approved concession framework to ensure the system provides operational certainty for all operators while ensuring high-quality visitor experiences and effective conservation management.

- **Polices for the management of specific activities.** The polices for specific activities must reflect a comprehensive set of tourism activities, and yet only accommodation is specified. In order to define the national polices that will flow into Area Plans, and others, these will need to be established in the NCPS. Other activities to be included may include commercial tramping, aviation, ski fields, transport connected to tourism, and others.

With respect to the accommodation policy, the term 'must not exceed 30 years, with no right of renewal' may need to be reviewed given consideration of Chateau Tongariro and potentially other accommodation on conservation lands.

Recommendation 9: DOC to review the specific tourism activities to be supported by polices beyond the current policy for accommodation.

Next steps

We would be happy to provide further information to support this submission. Please contact Bruce Bassett on 021 609 674 or bruce.bassett@tia.org.nz.

Ngā mihi,



Rebecca Ingram
Chief Executive

Attachment 1: TIA Assessment of Consultation Questions

Consultation Question	TIA Response
Directing Content of Area Plans	
#1 Is there additional content you believe should be included or removed within area plans?	The detail within the Area Plans is critical to the cascade to following steps, such as visitor amenities areas, that will be more specific. At present, the number of Area Plans, or their geographic coverage, are not known, but if we assume around the same number of Area Plans as there are Conservation Management Strategies (CMS), the areas will be large and will have multiple conservation and visitation needs and characteristics. In the NCPS, the flow-through of the economic development function set out in the Bill is not clearly seen in the Area Plan section, and this should be clarified. While TIA did not support the shift to the extent set out in the Bill, we do see the future DOC role around tourism to be more active than 'allow for' as provided in the current Act. Accordingly, the Area Plans (or the overarching legislation) needs to appropriately clarify what can be described as economic development. On tourism specifically, more clarity is needed. Reference is made to recreation and visitor zones, but there is no overarching policy statement around enabling tourism. We view this as needed given the cascade to other key layers, notably Visitor Zones and Visitor Amenities Areas. Both need to be grounded in the NCPS more clearly than we see in the draft. TIA welcomes that the arbitrary 'limits' will not be set in the Area Plans as this will allow adaptation and flexibility to change over time (although they will be set for pre-approved activities). The current practice highlights how such an approach creates problems for both DOC and operators. However, DOC will need both the tools and the capability to manage visitation appropriately as demand changes. TIA considers that the management tools and powers vested with DOC should be clearly specified in the NCPS. There is reference made to 'regulations and bylaws' and greater detail and transparency is needed in the NCPS on what these are and how and when they can be applied. This relates to both individual concession holders and to cumulative impacts that may result from the overall load from tourism activity. TIA wants DOC to be equipped with the tools it needs to monitor what is going on (data) with the ability to respond on an appropriate, timely and responsive basis. For industry, clearly understanding these powers and response mechanisms will be helpful. An outline of these mechanisms should be set out in the NCPS. TIA's interest is around the transparency of the system managing tourism activities in conservation places, including streamlined concession processing, and this should be reflected in the peak planning documents. Interestingly, what is missing in the material set out in the NCPS Area Plan text is the primacy of conservation, which TIA supports, and this should be clearly stated such as with reference to the amended function statement of the Bill at section 6(ea) as proposed at Recommendation 1 of TIA's primary submission. With the Area Plans to be such important planning documents, formal consultation with tourism interests must be built into the development processes.

Consultation Question	TIA Response
	Key points: 1. <i>Tourism to be specifically included as a mandatory aspect in all Area Plans to ensure consistency of treatment in the plans.</i> 2. <i>The powers and tools of DOC for managing visitation and effects need to be set out in the NCPS.</i> 3. <i>Consultation with the tourism industry to be a mandatory aspect of the process to develop Area Plans.</i>
#2 Do you have views on any transitional policies for area plans that should be considered?	Preparing the Area Plans will be a major task for DOC and will need to be undertaken at pace. The issue for tourism operators is that a long transition phase to establish and implement the Area Plans will extend the uncertainty that concessionaires have been dealing with for an extended period. Key Point: 1. <i>Transition to Area Plan establishment and application to be undertaken as quickly as possible to minimise inertia as the new approach is put in place.</i>
Visitor Zones	
#3 Do you have any feedback on the proposed approach to developing visitor zones?	The concept of establishing visitor zones to enable visitation and appropriate management is supported. These will allow high-load front-country places to be managed accordingly, with appropriate visitor facilities and environmental care. This zoning approach may not always be sufficient given that tourism, by nature, is mobile. For instance, within an Area Plan and its Visitor Zones, there will be visitor activity that involves crossing into multiple visitor zones, for instance, backcountry tramps, 4-wheel drive tours, cycle trails, alpine tourism, etc. Accommodating this cross-zone activity will need to be factored into the Visitor Zones. We don't know yet the size or number of Area Plans and therefore the intended size and nature of the Visitor Zones. This will have a major bearing on how they will work as practical mechanisms for managing our conservation places. With the Visitor Amenities Areas, we support these to allow forward spatial planning in a few areas that have, or need to have, a concentration of development to support well-designed and managed visitor activity. We see the VAAs as being enabling of appropriate investment and development. Our interest is in how they will be developed in terms of timeframe and consultation with industry, and how they will be governed and operated over time. Overall, TIA is seeking additional information being set out in the NCPS on the Area Plans and we seek assurance that consultation with industry will be a central part of the processes to establish them. Key Points: 1. <i>Tourism to be a specified component to be included in the Visitor Zones, including the Visitor Amenities Areas</i> 2. <i>Consideration to be given to enabling cross-zone tourism and recreation activities within each Area Plan.</i> 3. <i>Consultation with the tourism industry to be a mandatory aspect of the process to develop Area Plans.</i>

Consultation Question	TIA Response
Exempt Activities	
#4 Do you have feedback on any of the activities proposed for exemption from requiring a permit, and should we consider any others?	TIA supports having a category of exempt activities. The four listed appear reasonable, but we question whether the list is sufficiently complete and if further activities could be appropriately added For instance, the exempt filming relates only to 'news of the day filming or photography' which is very specific and narrow. We then look to 'filming' under pre-approved activities, and we see 'small-scale events' or 'small scale or medium scale commercial filming or photography'. In particular, the restrictions in relation to filming only being for 'one-off' events, not being permitted in weekends/public holidays and/or only being able to take place on existing tracks or in established visitor areas appear overly restrictive and unlikely to capture increasingly common activities associated with routine tourism related social media and promotional filming. As drafted, any filming not in these categories, or that are unable to comply with the draft terms and conditions, will require a full concession. This is understandable for some activities, such as a major film production (e.g. Lord of the Rings) and other forms of commercial filming, less so for other filming activities that are increasingly important to tourism operators. For instance, social media coverage of a person's visit or filming by an operator to promote their business and the places their clients will visit (which, depending on the activity, may be outside of the permitted locations). These days, filming is something typically done in a low impact manner on a regular ad-hoc basis (i.e., not in 'one-off' campaigns), using a handheld device, such as a phone, with more limited crew support than was traditionally required, and it is a ubiquitous activity. As worded, this specific narrowness would appear to have limited flexibility to change as other factors change, such as digital technologies. This feels like an area, as prescribed, that will be quickly out of date, if not already. If there are issues around IP and copyright, these should be clearly stated. Key point: 1. <i>TIA requests that further work is undertaken to define the nature of concession requirements for 'filming or photography' to establish appropriate and future relevant requirements.</i>
Pre-approved Activities	
#6 Do you have feedback on any of the activities proposed for pre-approval, and should we consider any others?	TIA welcomes the pre-approved activities category as a means to simplify the process for low impact activities. However, in doing so, there are several other factors that quickly come into play, for instance: 1. How will the pre-approved approach work for the operators involved given: the short terms involved; complexities in interfacing with existing concessions; where concessions may be needed for non-pre-approved activities; and limited ability to invest in a short-term tenure arrangement 2. For existing concessionaires operating in these areas, do they continue with their complex concessions, or do they drop these in order to go through an easier process, and what would they forgo in doing so.

Consultation Question	TIA Response
	1. The notion of tenure will be weakened for pre-approved concessionaires. Tenure is important for providing the foundation for investment in the quality of the experience provided. 2. How will priority be allocated where there is limited capacity. For example, if intending to use huts, what is the visitor experience if there are none left, or what is the experience quality if needing to use tents? These inherent uncertainties will be a concern to operators around the nature of the product they are selling to their customers. 3. It is not clear how limits will be established and enforced for the places where pre-approved activities take place, particularly high visitor load places. 4. How will the places be managed by DOC to ensure activities align with carrying capacity and are of a level of quality in keeping with the place involved. There is industry concern that DOC tends to be both reactive and slow in dealing with visitor pressures, whereas having the intent and the levers to quickly adjust will be needed. For instance, it took many years before DOC stepped into an active role to manage the Tongariro Crossing. Overall, we see scope for benefits from faster pre-approved concessions, but we see operational risks and difficulties. For instance, the arbitrary group sizes, the need to coordinate for hut bookings with other concessionaires, what priority is there for long term complex concession holder compared to a pre-approved concession holder. What parts of the PCL visitor network have excess capacity, and what is the nature of these places? What about how, for instance, non-bookable huts will be managed? How will usage tensions with non-commercial recreation activity be managed and resolved? If pre-approved concessionaires were to expand services to the tiers of tracks below the Great Walks and other key walks, there will likely be considerable displacement of domestic recreational activity, and how will this be managed? There is reference to bylaws and regulations in the terms and conditions section. Transparency of what these are will be needed. As set out above, TIA has concerns as to the limited scope proposed in relation to pre-approved filming activities and considers that the introduction of a new pre-approved filming activity known as 'low-impact promotional media activity' should be considered. Broadly speaking this would be a pre-approved concession, for a 12- month term, for ad-hoc filming or photography in relation to promotional, marketing, social media, educational, or informational purposes. Importantly, amongst other appropriate conditions, the activity could be limited to a small crew (max. 5 including crew and talent), and to handheld or portable film equipment only. Key Point: 1. <i>The pre-approved concession approach raises many operational questions. While the implications are not known at present, we see risk for operators, visitors, the ability of DOC to manage, and for the overall quality of the visitor experience. These will need to be carefully considered and actively managed</i> 2. <i>Consultation with the tourism industry is required as the details as to the pre-approved concessions are developed.</i> 3. <i>Introduce a pre-approved activity for low-impact promotional media activity.</i>

Consultation Question	TIA Response
#7 Are there other terms and conditions you think should be included or removed for these pre-approved activities?	Clearer outline of the powers or tools for how DOC will manage these pre-approved activities is needed. As set out above, the filming aspect is unclear. For instance, how would filming by a concessionaire for marketing purposes be treated, or filming by a visitor for social media use? To address this, TIA considers a pre-approved activities pathway should be established for 'low-impact promotional media activity', with the recommended activity specific terms and conditions being: • A maximum term of 12 months. • No permanent structures are to be erected. • The project must not require the exclusive use of the areas or compromise the enjoyment or safety of other users in the area. • You must not modify natural features in order to improve camera angles or locations. • You must not attach any equipment to existing structures which will irreversibly change or temporarily/permanently damage structures. • You must take reasonable steps to advise other PCL users of the filming presence and purpose, in accordance with the Privacy Act. • No road or track closures are to be in effect for the purpose of this filming. • Activity must be limited to a max group size of 5 people. Including crew and talent. • You must only use handheld or portable filming equipment. • Max group size 5 people. Includes crew and talent. • The use of a drone requires a separate permission. If not addressed in this way, the proposed activity description and draft terms of conditions for 'Small scale or medium scale commercial filming or photography on formed tracks or in established visitor areas' could be amended to better reflect the needs of modern tourism operators. Consideration should be given to the removal of the references to 'one-off' filming, the requirement to stay on formed tracks/within visitor areas and the restrictions from filming on the weekends and public holidays. These changes would better reflect that modern filming by tourism operators is typically done in a low impact manner on a regular ad-hoc basis (i.e., not in 'one-off' campaigns), using, for example, handheld devices, such as a phone, with more limited crew support than has been traditionally required. Either way, further consultation with industry is sought. Key point: 1. <i>Introduce a pre-approved activity for filming associated with low-impact promotional media activity that incorporates the above proposed terms and conditions;</i> 2. <i>As an alternative, make amendments to the currently proposed terms and conditions associated with pre-approved filming activities to better reflect the modern nature of tourism operators' filming activities.</i>

Consultation Question	TIA Response
Areas where pre-approved and exempt activities do not apply	
#8 Are there areas where you believe exempt and pre-approved activities should not apply? Please describe the area(s) in detail and the significant adverse effects on natural, cultural, or historic values, and why adverse effects cannot be avoided or mitigated.	TIA welcomes this question being asked in this consultation, but we are not well placed to specify particular areas, although appreciate this is an aspect that will need to be further considered as the NCPS develops. For tourism, managing supply constraints will be an area of focus, such as high occupancy huts or high-volume walks, tracks or sites of special interest. We wonder if some principles should be developed to guide decision making for where exempt and pre-approved activities should not apply. For instance, these could relate to carrying capacity, levers available to mitigate and impact on other concessionaires. If this were to occur, it is important consultation is undertaken with the tourism industry.
#9 What costs and benefits do you see in not applying pre-approved and exempt activities in specified locations?	If correctly identified, this may assist with addressing some of the concerns with the pre-approved process as to carrying capacity and cumulative impact.
Activities with standardised pre-assessment	
#10 Do you have feedback on any of the activities proposed for standardised preassessment?	TIA supports standardised assessment, including preassessment. The nature of the activities set out in Appendix 4 relates to infrastructure and facilities rather than to activities. While this will be useful to tourism operators seeking concessions to construct a facility, it does not cover the activities that make up the bulk of tourism concessions. Key point: 1. <i>DOC to develop a standardised assessment framework for activity-based concessions.</i>
Policies for the management of specific activities	
#12 Are there other management matters we should consider for one (or more) of these activities?	TIA notes that these policies are largely carried over from existing policies. In so doing, they reflect the historic policies as opposed to the ones we want to set up for the future. In terms of the accommodation section, clause e. states that '...a term that must not exceed 30 years, with no right of renewal' is not appropriate for all accommodation types and investments. For instance, the Chateau Tongariro project will likely require a longer term. Similarly, in Visitor Amenities Areas, it is highly likely that longer terms and/or with rights of renewal will be required to justify investment. It is important that the NCPS is enabling of investment, '...to the extent consistent with conservation.'

Consultation Question	TIA Response
#14 Should any other activities be managed by the NCPS?	On the 'other activities' covered in this section, accommodation is the only one that is tourism specific. Consideration must be given to expanding this set of policies to cover other common tourism activities. This would signal an enabling function and clearly set out what is involved which in the long term should benefit both DOC and tourism operators. Other policies could cover: • Commercial tramping activities. • Aviation. • Marine mammal and wildlife viewing tours. • Ski field operations. • Cycle tours • Transport connected to tourism • Filming • Others? Key point: 1. <i>DOC to consider including additional policies based on holistic consideration of balance and comprehensive coverage.</i>
Exemption from district land use consents	
#15 Are there other activities you think should be included in the non-exhaustive list (noting the activities must meet the requirements of the RMA section 4(3) exemption)?	No particular view, noting that these are largely carried over from the existing General Policy.
Policies for land reclassification	
#16 Is there any feedback you wish to provide regarding these reclassification policies?	No particular view, as above, although TIA considers that tourism and recreation use should be relevant considerations in reclassification processes.