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National Conservation Policy Statement - Consultation  
Department of Conservation  
PO Box 10420  
WELLINGTON 6140

By email: [samthomas@doc.govt.nz](mailto:samthomas@doc.govt.nz)

Kia ora

## **Draft National Conservation Policy Statement: TIA Submission**

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

This submission sets out key matters we want to raise, with our detailed feedback attached as Appendix 1. Please note that we also raise several questions throughout this submission and responses to these would be appreciated.

### **Overall position**

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TIA supports the overall conservation management system reform programme and the intent of the draft NCPS. This submission sets out TIA feedback and raises some key matters for your consideration.

TIA recommends that DOC:

- Enables the further iterative development of the NCPS in the interest of progressively improving the document ahead of its approval process or integration with legislation.
- Provides an outline of the other aspects that will be included in the final NCPS, with guidance on how some key matters will be set out in the draft legislation.
- Considers and addresses each point raised about the attributes that TIA members want to see in the NCPS and in the overall conservation management system.
- Continues to develop the system design as set out, getting more specific on the essential details, while ensuring there is flexibility and agility for making adjustments for reasonable activities and for addressing any situations of excessive usage or poor service standards.

### **Tourism Industry Aotearoa**

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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*.<sup>1</sup> 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.

Accordingly, 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, and we believe the entire industry, that tourism must be a positive contributor to conservation and care of nature across our country.

## **New Zealand Tourism Industry**

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Tourism is a major part of the New Zealand economy. It makes up 7.5% of GDP, 10.7% of employment and 17.2% of exports. Total visitor expenditure in the year to March 2024 was \$44.4b, comprising \$17b of international tourism and \$27.5b of domestic tourism.<sup>2</sup>

At one-fifth 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 \$7.3b in 2020 analysis)<sup>3</sup>, not to mention the contributions that tourism makes to conservation (and which we believe can be significantly increased with the right settings in place).

Our nature and landscapes are a key driver of visitation to New Zealand. The places that people visit and activities they undertake in these places 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.

## **TIA Feedback**

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TIA welcomes the programme to modernise the conservation management system including the proposed structure and initiatives to ensure faster, clearer and consistent decision-making on how activities on conservation lands will be managed.

TIA requests that in progressing the NCPS and the wider reforms, DOC takes the following points into consideration:

1. **Consultation Process.** The NCPS is an extremely important component of the future conservation system. We note that following this round of targeted feedback, there will be no further opportunity until the Select Committee seeks feedback on the Bill. This raises two questions. Firstly, does the NCPS need to be part of the legislative process, and secondly, what further input can TIA make particularly in the early stages of the development of the NCPS. We consider there is much to be gained from developing a document like the NCPS on an iterative basis with stakeholder input. This suggests it should be developed separately from the Bill itself.

**Recommendation:** DOC to enable the further iterative development of the NCPS in the interest of progressively improving the document ahead of its approval process or integration with legislation.

2. **Complete NCPS.** We welcome the emphasis on tourism matters in the draft NCPS but we consider that this peak strategic policy document of the new conservation management system will involve many other elements, including the primacy of

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<sup>1</sup> <https://www.tia.org.nz/tourism-2050/>

<sup>2</sup> <https://www.stats.govt.nz/information-releases/tourism-satellite-account-year-ended-march-2024/>

<sup>3</sup> <https://www.tourismnewzealand.com/assets/insights/industry-insights/tnz-te-ohanga-report-2.pdf>

conservation and biodiversity. It would be beneficial to see how the tourism-related aspects sit alongside those other aspects. For instance, it is not clear what the roles and responsibilities of the Conservation Authority and the Conservation Boards will be in the new system given that the Minister will be responsible for approving the NCPS and the Area Plans. While this, and other important matters like giving effect to the Treaty of Waitangi, will be set out in the legislation, this highlights that there are gaps in our understandings of key matters as they related to the draft NCPS.

**Recommendation:** DOC to provide TIA with an outline of the other aspects that will be included in the final NCPS, with guidance on how some key matters will be set out in the draft legislation.

3. **Key attributes industry wants in the NCPS.** Feedback from our members highlights some critical elements to be considered as the Bill and the NCPS are further developed:

- **Flexibility and adaptive.** While there is broad agreement for some of the innovations in the NCPS, such as visitor zones, there is also the requirement for flexibility in the system. This is because of highly diverse ways that visitors will want to experience our conservation places and because a lot can happen over time with changed preferences or new attractions or activities. This makes it important that this pragmatic flexibility is built into the system and that there is a mechanism for raising matters for practical resolution.
- **Aligning with the commercial model of operators.** This is a perpetual matter being raised by our members as it relates to the underlying nature how a business is run. This is particularly so where investment in enduring infrastructure or expensive machinery or equipment is fundamental to their operations. This requires that the concessions grant required security of tenure aligned to the nature of the operation, with factors like concession term, asset type, use by other partners among the factors to be considered. We know that much needed investment has not been undertaken in recent years due to concession uncertainty, and the ultimate consequence of this is a lesser quality of visitor experience. We need to establish settings that enable investment to elevate the quality of the New Zealand visitor experience, and to do so in ways that benefits nature.
- **Creating the right incentives for operators.** Operators tell us they run their business because they love the special places that they have the privilege to take people to. Many commit time and resources to caring for the places they operate, with multiple examples of tourism operators undertaking meaningful restoration projects, often in partnership with DOC. In the interests of nature, we consider that more can be achieved if operators could see their efforts recognised in their concession conditions, for instance. Rewarding the actions we want from concessionaires seems a way to get more effort towards caring for nature across our country.
- **Competitive processes for concessions.** There is concern on the methods for triggering and applying competitive processes to concession allocation. TIA set out its thinking on this in the early consultation on the conservation management system, but the NCPS silent on this matter. At its heart, this lies in the sense of tenure that concessionaires have (which impacts investment product development, etc.) and the idea that operators have worked over time to create a product that is embedded in the tourism distribution system and is therefore a valued business asset. This is vulnerable to whatever outcome that might emerge from a tender process. Operators are looking for substantive gains in this area in the new system.
- **How will limits and quality be managed.** The NCPS references how places will be managed and that pre-approved operators will be managed through standard terms and monitoring. We appreciate these references but foresee that management of quality standards and volumes could be problematic, for instance

if poorly run, start-up operators brought in large volumes and crowded-out other users of places or the facilities provided (e.g. huts in designated visitor zones). No doubt DOC understands the concern and will be able to adjust the settings, but it is an area our members see risk, especially as elevating quality is the desired direction of travel for the system as a whole and for the integrity of their operations.

- **Processes for the other 60% of concessions.** The draft NCPS sets clear steps to streamline the concession processes, especially for the pre-approved applicants that may make up 30-40% of applicants. What was less clear is the process for the other more complex concessions. Again, these members are looking for quicker and easier processes that reduce the cost and complexity of the process itself, thereby contributing to the more secure concession arrangements that are key to investment and quality improvement. The NCPS needs to be more specific in this area.
- **Community voice.** There is interest in ensuring public input into key processes, such as the establishment of Area Plans that we understand will be critical for setting the spatial zones and defining the activities and where they can take place. Operators see themselves as community members and are wanting to understand how their voice can be expressed alongside others. Fundamentally, how we use our conservation lands and waters is a societal question (social licence), and there was some concern expressed at the potential removal or reduced roles of the Conservation Authority and the Conservation Boards and the public input processes they use.
- **DOC Processes.** Members are very positively viewing the establishment of the new tourism conservation management system. It was expressed that it will be something they will adapt to, and they reflected that DOC will also need to adapt to the new system, and be resourced appropriately, particularly to operate on a more commercial basis with modern client management and IT systems.

As TIA consistently sets out, what operators want above all else is concessions that reflect the business model they operate to, enables opportunities for growth based on forecast demand and evolving visitor needs, and which provides security of tenure that allows them to invest in the facilities, equipment and workforce they require to sustain this business model.

**Recommendation:** DOC to consider and address each point raised about the attributes that TIA members want to see in the NCPS and in the overall conservation management system.

4. **Positions on the consultation questions.** TIA has addressed the consultation questions asked (refer Appendix 1) with higher level views set out as follows:
  - **Conservation Planning System.** TIA supports the streamlined system with the legislation to NCPS to Area Plan cascade. We await the wording of the Bill that will be available once the introduced to Parliament, and that will include key details of the overall system, including on giving effect to the Treaty of Waitangi. With respect to the Treaty, we expect it to be influential in the final NCPS and so understanding what is intended would assist our considerations of the NCPS itself.

As mentioned earlier, we do ask why the NCPS is associated with the same conditions as the Bill whereas we would prefer a more iterative approach for further developing it. The next key step will be around the development of the Area Plans, and we anticipate this will follow the passage of the Bill and we are interested in the process for develop them.

Aligning decision-making is supported, with the caveat that all key decision making will be made by political leaders which may lead to policy swings over time that will concern members seeking a long term and stable operating environment.

As a new approach to conservation management, and with a number of areas that can only be tested in practice, TIA would like provisions added to ensure key aspects can be regularly reviewed and reset if necessary.

- **Area Plans.** These are generally supported as a means to establish spatial zones for managing investment in facilities, the allocation of concessions and caring for nature in relation to visitation factors. A concern to note is the rigidity that can come from land classification and visitor zoning (such as the ROS Spectrum set out in the draft NCPS). It is important to provide for the need for flexibility and agility as things change over time. For instance, in some highly managed circumstances, it will be appropriate to enable visitors to even the most sensitive ecological places which can in turn raise awareness about conservation and raise funds to support conservation-related activities.
- **Land classification and visitor zones.** Designation of visitor zones is supported with potentially streamlined concessions or permits for these places, along with appropriate infrastructure to manage the place for higher levels of visitation. In establishing the visitor zones, it will be important to reflect how people move around a place and what they do. For instance, the 'zone' may need to be corridors along which people walk or cycle, or some other reason. As set out earlier, ensuring flexibility and agility is built into the system will be important. There is question also on how exclusionary the applications of such zones might be, and we consider that all visitation can be positive if undertaken appropriately.
- **Exempt and pre-approved activities.** Streamlining the concession system for low-impact activities is welcomed and will serve to relieve an administrative burden on operators where it is not the most appropriate tool. This is a big and practical gain. TIA's main areas of interest relate to the thresholds for when and where activities will fall under the pre-approved category and also how volumes will be managed. For instance, it could be that a pre-approved operator offering overnight walks could utilise capacity that is then not available for other users and not undertaken to a desired quality standard. DOC's management responses will need to be designed into the system, and these will need to be data-driven and responsive, and with enforcement.

**Recommendation:** DOC to continue to develop the system design as set out, getting more specific on the essential details, while ensuring there is flexibility and agility for making adjustments for reasonable activities and for addressing any situations of excessive usage or poor service standards.

## Next Steps

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We would be most pleased to elaborate on any points raised in the submission or to meet with you to discuss it, including to engage in further input into the draft NCPS. If so, please contact Bruce Bassett on 021 609 674 or [bruce.bassett@tia.org.nz](mailto:bruce.bassett@tia.org.nz).

Ngā mihi,



Greg Thomas  
Acting Chief Executive

## Appendix 1. TIA Response to Consultation Questions

	Consultation Question	TIA Comment
<b>Purpose of the paper</b>		
		<p>TIA supports the intent and substance of the process underway to modernise conservation settings to meet current and future needs.</p> <p>TIA's central premise in relation to these reforms is that we must build on the positive relationship between tourism and nature in our country: tourism being good for nature, and nature being good for tourism.</p> <p>TIA requests an iterative approach to developing the wording in the legislation. Our assessment of the material set out in this consultation paper is that the needed precision is not yet there as you will see in our comments below.</p> <p>We request that TIA be engaged to work with DOC on the development of the NCPS. While the ability to submit to Select Committee processes is valued, we feel we can make a stronger contribution at the current phase of development.</p> <p>Overall, what we are seeing in the draft NCPS is a 'partial' NCPS with several gaps that need to be filled. TIA requests that the more complete draft NCPS is provided to assess so we can assess the visitor-related aspect alongside the others.</p> <p>With the NCPS to be used and interpreted in the decades ahead (and likely in the courts at some stage), every effort must be made that it is extremely clear in both its language and concepts.</p>
<b>Modernising the conservation planning system</b>		
		<p>TIA supports the design of the proposed conservation planning system.</p> <p>The cascade from legislation, to the NCPS, to Area Plans is vastly simpler than the current model. Assigning decision-making with the Minister of Conservation will serve to enable a more responsive policy framework for conservation.</p> <p>However, the streamlined nature of the proposed system highlights the criticality that each of these layers are correctly set.</p> <p>Our reading of the consultation paper is that it sets out three areas of interest to tourism, but does not cover other aspects that would be expected to make up the NCPS. For instance, we would expect to see high level statements or principles on our conservation system: what we expect from it; and what we commit to uphold in terms of conservation outcomes.</p> <p>Providing feedback on these three areas is therefore difficult without the assurance of the higher-level statements of intent. We note that the Area Plans will outline values and objectives, but these should be about applying that higher-level intent. It may be that the legislation covers these aspects.</p> <p>TIA contributed to DOC's earlier partial review of general policies to give better effect to the principles of the Treaty of Waitangi and we support this being advanced firstly through the legislative process.</p>
<b>Content of Area Plans</b>		
		<p>TIA supports the establishment of 'area' as the layer that enables appropriate management of conservation lands and waters, both for conservation and for usage through such mechanisms as tourism and recreation.</p> <p>TIA supports Area Plans that are standardised and consistent throughout the country.</p> <p>At this stage, it is not known what the scale of the Area Plans will be. For instance, is it all of the Te Wāi Pounamu World Heritage area, or Fiordland National Park, or a more localise site such as the Milford Sound Piopiotahi area? Might they be conservancy areas? The size of the 'area' will have a major bearing on what each Area Plan will look like.</p> <p>TIA welcomes the proposed creation of "visitor zones" to set out more specifically how recreation and tourism activities will be described and enabled in Area Plans. Having such zones set out should serve to streamline the consideration of tourism usage and support faster and more consistent decisions. TIA is</p>



mindful that these zones must be established in relation to conservation values and objectives, and with flexibility for travel between zones. It is important there is this balance in the Area Plans that reflect the actual ways that tourism activity takes place.

TIA welcomes the use of values and objectives to “inform, but not prescribe”. For the NCPS and Area Plans to endure over time they need to be adaptive to changing circumstances.

So while there is a move from these prescriptive limits, the draft NCPS is silent on levels of acceptable change, not so much on the usage levels, but on the outcomes that are achieved over time. Again, this suggests the values and objectives in the NCPS need to be very well set.

The “value types” on page 5 are categories and not actual “values”. More work is needed to specify these in the NCPS.

TIA is concerned that without the full expression of the NCPS itself, it is difficult to fully understand the substance of this Area Plan material, and we would be keen to provide further input on this.

Another significant concern lies with the lack of discussion around volumes of activities and cumulative impact. How concessions are allocated permitted volumes will be important, particularly in relation to volume limits, and how limits are expressed seasonally, or by day (weekend vs midweek) or as weather allows.

As TIA has articulated, what operators want above all else is concessions that reflect the business model they operate to, enables opportunities for growth based on forecast demand and evolving visitor needs, and which provides security of tenure that allows them to invest in the facilities, equipment and workforce they require to sustain this business model.

1	What should be considered when determining the boundaries of places within an area plan?	<p>The idea of Area Plans as spatial plans with distinct places is supported.</p> <p>However, there can be different desired uses for the same place. For instance, a place could have high ecological values and high tourism values. How would these be reconciled? We note the ‘land classification’ and ‘visitor zones’ appears to be the means to balance these different uses.</p> <p>Another factor is that visitor activity can take place along ‘corridors’ that can cut across a number of places meaning discrete and separate uses might be difficult to establish.</p> <p>Also, usage of places can change over time as new activities get invented (for instance) that might need to operate in places that might currently not be classified as a visitor zone.</p>
2	How should area plans describe values and objectives to ensure that they are informative, user-friendly and concise?	<p>The Area Plans values and objective should reflect those of the NCPS, albeit that the NCPS ones should be higher level and more strategic.</p> <p>TIA considers that the values need to reinforce the pre-eminence of nature and that other activities take place to support or enhance this objective. Doing so would in turn establish incentives for those activities to operate to this value.</p>
3	Do you have any feedback on the proposed visitor zones?	<p>TIA supports the visitor zones as a direct means of enabling visitation and streamlining approval processes.</p> <p>The visitor zones appear appropriate. The challenge will be in applying these in the Area Plans.</p>

#### **Content of Area Clarifying where activities can or cannot occur through land classifications and visitor zones**

TIA considered the exclusionary aspect of this section to be problematic. While we completely support certain areas being restricted for conservation reasons (Te Hauturu-o-Toi Little Barrier Island, Codfish Island Whenua Hou, and the like), this approach could both unnecessarily restrict tourism activity and the benefits that tourism can bring to sensitive places.

This could include contributing to predator control and providing safe access to highly valued ecological places that might boost donations and interest in conservation. Or it could be to provide public access to the breeding site of rare birds (e.g. Kotuku) that both create a commercial opportunity, improved conservation, while providing safe and managed access to the site.

4	Do you have any feedback on the proposed approach for standardizing where activities can and cannot occur?	<p>TIA supports the general approach to standardize where activities can occur. However, what the concessionaire offers can differ considerably.</p> <p>For instance, while the 'visitor zones' categories are logical, they reflect spatial structures, whereas there are ecological drivers that need to overlay the system. For instance, a place may not be a visitor zone but may have a population of rare birds (e.g. Kotuku) that in turn can be a visitor attraction. How will these considerations be handled?</p> <p>How the system will handle volumes, congestion or ecological impact for 'standardised activities' in 'visitor zones' will need to be carefully considered. If these factors are not managed, the tourism product and the environment will be damaged.</p> <p>Again, flexibility and agility in the system will be important.</p>
5	Are there other activities that should be standardised by the NCPS?	-
6	Do you consider any of the proposed activities to be consistent or inconsistent with any land classifications or proposed visitor zones?	<p>The underlying question is around how volumes and impacts will be managed within the visitor zones by exempted or pre-approved activities.</p> <p>As set out, DOC will need the powers and processes for reconciling different viewpoints of different stakeholders, operators, Iwi, general public and competing resource users.</p>

#### **Exempt and Pre-approved Activities**

TIA supports the establishment of exempt or pre-approved activities and the resultant streamlined processes that will be used by DOC.

We are also conscious that these activities must be seen in relation to the 'places' and visitor zones' being established, and the sentiment with the wider set of legitimately interested stakeholders.

7	Do you have any feedback on the proposed exempt and pre-approved activities?	<p>TIA supports the approach, with the necessary checks and balances to be put in place.</p> <p>The pre-approved list is comprehensive and enabling.</p> <p>That said, there are questions around the management of these and how concerns are addressed.</p> <p>For instance,</p> <p>'Commercial Guiding overnight or multi-day walks on formed tracks. Includes staying in accommodation on PCL (whether a tent, hut etc.).</p> <p>How would this work if exceeding the capacity of huts or facilities? How would the interests of parties that may get crowded out of the facilities be handled?</p> <p>Hypothetically, there could be all sorts of issues arising from this wording.</p>
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8	Are there other activities we should consider for pre-approval or exemption, including cultural activities to support Maori access to conservation lands?	-
9	Do you have any comments on when it would be appropriate for an area plan to disapply categorisations and/or conditions	<p>The term 'disapply' is not widely understood so find a plain language alternative.</p> <p>The system needs to be able to land on a 'sweet-spot', but it also needs levers to enable DOC to manage the system if it gets out of balance. Standards and ability to enforce will be important.</p>
10	Do you have any other comments on the provisions for exempt, pre-approved and prohibited activities?	-