



4 February 2019.

Hon David Parker  
MBIE  
Wellington.

Dear Minister,

**Draft Aotearoa New Zealand Government Tourism Strategy**

We wish to be heard in support of our submission if such an opportunity is available.

**Introduction**

Federated Mountain Clubs was founded in 1931 and advocates for New Zealand's backcountry and outdoor recreation on behalf of over 22,000 members of more than 80 clubs. FMC also indirectly represents the interests of many thousands of other people who enjoy recreation in the backcountry. This fundamental function gives FMC a strong interest in development of a strategy for tourism that upholds the integrity of Aotearoa's public land and the egalitarian, nature-on-nature's-terms recreation that takes place there.

FMC is independent and apolitical.

As proponents of development of a New Zealand tourism strategy, we acknowledge the work and consultation that have gone into the draft and appreciate the chance to have further input.

**Our submission**

FMC supports the intention of Government, expressed in the draft document, to apply strong direction to tourism in Aotearoa.

In the following, our advice is largely high-level and has implications for the whole document. We also address a small number of specific aspects of the draft strategy.

### **Statutory environment**

In large part, Aotearoa's tourism is focussed on the natural values of public conservation land administered by the Department of Conservation.

DOC's primary Act is the Conservation Act 1987. We note, in particular, the section describing the Department of Conservation's functions:

*Section 6 (a): to manage for conservation purposes, all land, and all other natural and historic resources, for the time being held under this Act, and all other land and natural and historic resources whose owner agrees with the Minister that they should be managed by the Department*

We also note the functional hierarchy set out in section 6(e):

*To the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism.*

National parks, administered by DOC, are especially attractive to tourism. Therefore, we refer also to the principles of the National Parks Act 1980:

#### Section 4

- (1) It is hereby declared that the provisions of this Act shall have effect for the purpose of preserving in perpetuity as national parks, for their intrinsic worth and for the benefit, use, and enjoyment of the public, areas of New Zealand that contain scenery of such distinctive quality, ecological systems, or natural features so beautiful, unique, or scientifically important that their preservation is in the national interest.*
- (2) It is hereby further declared that, having regard to the general purposes specified in subsection (1), national parks shall be so administered and maintained under the provisions of this Act that-*
  - (a) they shall be preserved as far as possible in their natural state:*
  - (b) except where the authority otherwise determines, the native plants and animals of the parks shall as far as possible be preserved and the introduced plants and animals shall as far as possible be exterminated:*
  - (c) sites and objects of archaeological and historical interest shall as far as possible be preserved:*
  - (d) their value as soil, water, and forest conservation area shall be maintained:*
  - (e) subject to the provisions of this Act and to the imposition of such conditions and restrictions as may be necessary for the preservation of the native plants and animals or for the welfare in general of the parks, the public shall have freedom of entry and access to the parks, so that they may receive in full measure the inspiration, enjoyment, recreation, and other benefits that*

*may be received from mountains, forests, sounds, seacoasts, lakes, rivers, and other natural features.*

Natural values' conservation is an unequivocal bottom line for both statutes, and decision-making related to public conservation land is by the Minister or the Department. Provincial Growth Fund workstreams must respect this.

### **New Zealanders' recreational culture - and national culture - in Aotearoa's public conservation space**

New Zealanders' backcountry recreation is supported by the above statutes. It has an egalitarian, self-reliant culture; nature is encountered largely on its own terms. Built facilities - huts, tracks, and bridges - are simple, imposing themselves minimally on the natural environment. Huts are communal, their purpose provision of 'shelter from the storm'.

With basic skills generally acquired in front country areas, many generations of Kiwi trampers, hunters, climbers, anglers, naturalists, workers in the backcountry, and others have embraced and fostered a way of life in Aotearoa's wild public places. Cutting across socio-economic lines, it is unifying and a significant part of what it means to be a New Zealander.

This aspect of national culture is intrinsically unostentatious; the negligibility of the human footprint is a *sine qua non*. In essence, less is more (the reverse applies also).

It is essential that this major part of New Zealand life is explicitly safeguarded nationwide and not only in places where there is minimal demand for tourism activity.

### **A supply-side approach**

A tourism strategy that has a demand-oriented standpoint will, no matter how well-considered its details, not achieve the outcomes New Zealanders expect due to its primary focus on external forces. The draft, though it has many positive aspects, approaches tourism through such a lens.

A deliberately supply-focussed strategy is greatly preferable because it can ensure our land, people, and values are the primary considerations in decision-making at all levels.

Significantly, where public conservation land is concerned, a supply-side focus is in accordance with section 6(e) of the Conservation Act, which directs that tourism be *allowed* only where the use of that land *is not inconsistent with its conservation*.

Economically, a supply focus should ensure tourism ownership and control are local.

New Zealand cannot - and should not attempt to - be all things to all potential and actual visitors. Focussing on what our land and society should, and are able to, provide for international tourism will allow us to be true to ourselves and to provide authentic experiences for visitors. It will also allow confident decision-making when inevitable constraints are needed.

## **New Zealand's tourism strategy can and must explicitly aim to deliver more than economic gain to New Zealanders**

FMC believes that tourism should aim, unequivocally, to do more than bring financial gain.

The notions of 'social licence to operate' and of ameliorating 'pain points', as articulated at the October DOC-MBIE meetings, inherently accept significant negative day-to-day and entrenched effects of tourism. They unnecessarily set expectations too low. Ongoing background abrasion from the industry is neither inevitable nor acceptable. FMC believes it is realistic and important to aim for better from tourism.

The industry is inherently non-essential and therefore vulnerable, which the draft strategy rightly points out. When/if it fails, our wild lands, communities, cultures, and infrastructure should remain in high health; we should not be left the poorer for it.

Genuine practical win-wins for local communities and tourism should be sought actively. These could include public transport, recreation opportunities, and events.

Significantly but less tangibly, tourism has the capacity to affirm our nationhood by giving Kiwis the chance to own and offer visitors from different backgrounds authentic experiences that are true to our land, history, culture, and communities.

## **Sustainability**

The word *sustainability*, used liberally in the draft, needs explicit definition.

To be able to make the claim of sustainability genuinely, tourism and its component activities should be able to be carried out without negative environmental or social externalities and function that way indefinitely.

At the least, the industry will need to be carbon neutral and cause no direct or indirect biodiversity loss. Plastic and other waste/pollution must be addressed properly. Action plans, including short- and longer-term milestones and necessary practicalities, must be established in order to achieve this work.

Short-haul tourism has greater potential to be genuinely sustainable than long-haul visitation; the industry should adjust its focus accordingly.

Tourism accoutrements should have local provenance wherever possible, standards for product durability should be set and enforced regardless of country of origin, and Aotearoa-equivalent environmental standards and industrial conditions should be requirements wherever tourist supplies cannot be sourced locally.

Taxes on non-sustainable activities and items could lead to decreases in tourist numbers. The strategy should prioritise identification of and pathways for transition to types of businesses and destinations that will be resilient to such risks.

Potential industry growth is a complex matter with a raft of possible consequences; it should not be accepted, *per se*, as positive, necessary, or inevitable.

### **Accepted practice is not necessarily best practice**

Tourism entrepreneurs have created, sustained, and developed certain modes of tourism activity, establishing industry orthodoxies (for example, self-drive vehicle use, cruise ships' in-harbour rather than off-shore anchorage, and helicopter-based sightseeing) that are minimally questioned or changed.

The industry must be ready to accept substantial shifts in order for it to be genuinely environmentally and socially sustainable.

### **Wilderness is rare internationally**

A primary point of difference for New Zealand tourism is that, in this English-speaking developed nation, there is extensive natural wilderness. The more it is compromised internationally, the greater the mana of our own wild places.

Pressure to alter wilderness is unremitting. Past decision-making that has resisted that pressure has left the legacy Kiwis and others enjoy today.

Desired by tourism for its striking naturalness and beauty, wilderness is easily harmed by the very industry that most lauds those qualities. Proposals that would compromise the taonga of wilderness are unacceptable.

### **New Zealanders exploring Aotearoa are not tourists**

Aotearoa is the land Kiwis come from. We are linked to the land and to one another in a multitude of ways, from our bureaucratic systems to our cultural, physical, and social histories. When we're on holiday in New Zealand, we're exploring the place that makes us who we are.

Our international visitors have their own homelands; for New Zealanders, it is here. Kiwis should not be referred to as tourists in our own land.

### **Specific infrastructural needs**

Public transport capacity should be fast-tracked to reduce tourism's carbon emissions and to alleviate roading and carparking congestion and road safety issues, which cause New Zealanders significant frustration and legitimate concern.

Many more toilets are necessary. This issue, also, should be treated with urgency. The necessity is nationwide. Areas that have been largely overlooked and have particularly high need are those

where tourists take advantage of access across private land; human waste issues in such places could lead to significant long-standing access provision being withdrawn.

### ***Putting it together - the Great Walks as a crystallisation of an environmentally and socially sustainable Aotearoa tourism industry***

The following are potential features of Aotearoa's Great Walks managed in a supply-driven tourism milieu:

- \* Information supplied by DOC, Tourism New Zealand, and others, portrays Great Walks' natural environments realistically, that is, involving considerable challenge in terms of terrain and weather.
- \* Information supplied by Tourism New Zealand, DOC, and others shows a typical New Zealand backcountry social environment. Accommodation is modest and communal.
- \* Kiwishare bookings are offered annually prior to the international booking system going live.
- \* All facilities defer to the natural environment and foster growth in backcountry recreation. Huts are for 'shelter from the storm'. Tracks are simple and encourage general navigational awareness and dexterity.
- \* On the Walks, there is minimal intrusion from the outside world. Helicopters are not seen or heard except in cases of emergency and for conservation management/ research purposes where there is no practical alternative.
- \* Differential charges may be discontinued; potential perverse consequences include agency/brokerage, illegal camping, a skew towards privilege within the international visitor group, and demand for increasingly lavish facilities.
- \* Most international Great Walks users and many New Zealanders arrive and depart by public transport, which is increasingly likely to be electrically-powered.
- \* The Walks' natural and social histories are showcased.
- \* Pre- and post-Great Walk supports and supplies such as accommodation, camping equipment supplies, and food are located off public conservation land.
- \* Supplies for all people using Great Walks are of local provenance where possible, meet standards for genuine environmental and social sustainability regardless of origin, and, where relevant, meet standards for durability.
- \* Toilets should be sufficient in number and location to accommodate needs of international visitors using Great Walks from the time they arrive in New Zealand until their departure.

**Recommendation: that the above advice be used to guide revision of the draft strategy.**

### **Specific aspects of the draft strategy**

#### **Graphic summary**

The summary on page 7 needs significant alteration in accordance with the above general advice, which advocates for explicitly prioritising the well-being of Aotearoa's natural environment, our

unique recreational culture within it, our communities' coherence, and New Zealanders' need to remain in command of them.

To make such strategic prioritisation a reality, a supply focus is essential, economic goals should be set as lower-order priorities, and a meticulously-set path to genuine sustainability is necessary, as per advice above.

This in line with the Government's vision for the development of the nation's well-being measures.

#### **'Value over volume'/values**

While FMC agrees that volume-based tourism has significant downsides, adopting a blunt 'higher-end' model (page 19) would be inadvisable also.

For international tourism in Aotearoa to be embraced by New Zealanders, its returns must be more - and more meaningful - than simply economic, as per the tenor of this submission. Negative effects of a strategy focussed primarily on economic factors could include issues such as reduction of opportunity for Kiwis to connect with like-minded people from other nations, and broader alienation of New Zealanders from international visitors.

FMC would prefer to see the strategy focus on values rather than 'value'; visitors should be targetted for their genuine interest in New Zealand's natural environment and cultural landscape over their spending capacity.

#### **Seasonal and new destination development**

While seasonal dispersal and new destination development are attractive propositions, the precautionary principle should be applied.

Environments and communities experiencing heavy summer-based tourism loads may depend on off-season recovery periods for sustainability. Places presently experiencing little tourism may have minimal desire for an industry presence or may have limited environmental and/or social capacity to have one.

Comprehensive consultation with communities, stakeholder groups, and, where relevant, with the Department of Conservation and other natural environmental experts, should take place before consideration is given to encouraging extended local tourism seasons or developing new destinations.

**Recommendation: that the above advice on specific aspects of the draft strategy be adopted.**

## International visitor and conservation levy

This tax will provide for certain practical environmental and infrastructural needs to be met. Perhaps more importantly, it will have significant symbolic impact. Though it will be a small income stream compared with tourism-related GST, its crystallisation of the nation's desire for a principles-based strategic approach to the industry means the way it is spent will be watched with interest.

The make-up and strategic choices of the levy's governance panel will be important. Given the significance of the backcountry to the nation, FMC expects the outdoor community to be represented.

FMC's independence, apolitical character, and robust history of activity in and advocacy for Aotearoa's wild lands make our organisation appropriate for governance group membership: we request a place for FMC on any panel established for governance/decision-making on the international visitor and conservation levy.

***Recommendation:*** that Federated Mountain Clubs be part of any group established for governance/decision-making on the international visitor and conservation levy.

Yours sincerely,

Jan Finlayson,  
Federated Mountain Clubs vice-president.

FMC – FEDERATED MOUNTAIN CLUBS

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