

Submission on Exploring Charging for Access to Some Public Conservation Land

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Submitter details

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Submission

Introduction

1. Recreation Aotearoa is a registered charity, and the organisation responsible for providing leadership, advocacy, and professional development opportunities for those involved in the broader recreation sector. We work at an agency, industry, and professional level to build capability, develop partnerships, and equip individuals and organisations with the skills they need to deliver high-quality recreation experiences that engage participants.
2. The Recreation Aotearoa membership includes recreation policy makers, territorial local authorities, voluntary organisations, regional sports trusts, outdoor recreation businesses, and others involved in the delivery of recreation throughout New Zealand.
3. Our mission is enhancing wellbeing through recreation.
4. Recreation Aotearoa believes recreation is vital to New Zealand society. Recreation is not just about enjoyment. It is about being healthy, engaged and stimulated, having fun, and interacting with others, whether through outdoor recreation, community recreation, or aquatic and facility-based recreation. Recreation is a major contributor to the physical and mental health of individuals, and to the resilience of our communities.
5. Greater understanding of these benefits and their downstream impacts, along with awareness of how legislation, regulation and policy can influence recreation delivery, are key to ensuring that New Zealand's recreation opportunities remain among the world's best.
6. We acknowledge and thank the Department of Conservation (DOC) as the major provider of New Zealand's outdoor recreation opportunities. By investing in outdoor recreation, DOC is helping to instil a lasting culture where active living and a connection with nature matters.
7. DOC has a critical part to play in ensuring people continue to enjoy quality recreation opportunities. Recreation Aotearoa notes that DOC spends in excess of \$200m per annum on the provision of recreational opportunities. In the context of the entire Sport and Recreation 'system', this level of

expenditure places DOC in the realm of Sport NZ itself and above all but the largest Local Territorial Authorities.

8. 80% of New Zealanders visit Public Conservation lands and water at least annually. Recreation Aotearoa notes that according to Sport NZ data, the most popular forms of Active Recreation among NZ adults (Walking, Swimming, Mountain Biking, Fishing, Hunting, Tramping, Trail-running and Snow Sports) are undertaken on Public Conservation Land.
9. Public Conservation Land, managed by DOC, makes up one third of NZ's land mass. The extent to which DOC fulfils its statutory duty to foster recreation on Public Conservation land has huge determinative effects on recreation opportunities and the recreation sector.

General comments

10. Recreation Aotearoa recognises that DOC faces financial constraints in managing conservation land and infrastructure but believe that access charging should not be the primary mechanism for addressing funding gaps. If it is intended to be a Visitor Management Tool, it should be considered alongside or after the plethora of alternative Visitor Management tools.
11. Existing revenue tools, such as the International Visitor Conservation and Tourism Levy (IVL), concession fees, and targeted facility charges (such as car parking fees), should be fully optimised before introducing broad access charges.
12. Access fees should not undermine New Zealanders' rights to access public conservation land, which has been a longstanding pillar of recreation and conservation policy in Aotearoa.
13. Sustainable funding solutions must be long-term and holistic, rather than reactive measures that risk limiting equitable access.
14. If access charging is introduced, clear objectives should be established for access charging—ensuring that funds are used transparently, and outcomes align with DOC's core conservation and recreation mandates.

Specific responses to Part 1:

15. Recreation Aotearoa submits that access charging is one tool of many that could be considered, be it for the sake of Revenue collection OR Visitor Management. The consultation document frames it as a stand-alone mechanism, separate and apart from the broader planning changes, proposed elsewhere. This suggests the primary goal is revenue generation not conservation and visitor experience management, as this Part suggests.
16. -Access charging needs to be considered holistically alongside other visitor use management tools available, as part of a broader visitor management strategy and synchronised with the changes proposed in the Modernising conservation land management discussion document.
17. As part of a holistic approach, other visitor use management tools, such as improved concession processes and facility planning, should be fully explored before implementing access charges. We submit that a hierarchy of tools might be established, with access charges as a last resort tool when nothing else is appropriate or likely to be effective and all other management tools have been exhausted.
18. Recreation Aotearoa submits that some attempt should be made to prioritise alternative funding mechanisms. Before introducing access fees, DOC should first optimise existing revenue sources, such as the International Visitor Levy (IVL), concession fees, car parking fees and targeted facility charges.
19. Recreation Aotearoa submits its support for the inclusion of equity as an objective when undertaking the assessment of access charging options. We note that the Local Government Act similarly requires Councils to have policies on who pays what proportion for various services. For example, how much of the cost of providing an aquatic centre comes from general rates, and how much from user charges. If DOC were to establish policies akin to these, it would be best practice and our expectation that they would be developed in consultation with stakeholders.
20. Recreation Aotearoa submits its support for the inclusion of enhanced visitor experiences, as an objective. The primary purpose of access charges should be managing visitor use and improving conservation outcomes. We commend

the fact that revenue generation is not mentioned as an objective. But, as per paragraphs 10, 15 and 17 above, this objective needs to reference other available visitor management tools and provide an explanation of how access charges will be considered relevant to these.

21. Recreation Aotearoa supports the inclusion of accessibility as an objective, to the extent to which it ensures that the application of access charges is selective and targeted. It is our hope that the pursuit of accessibility would mean that access charges would only be applied as a last resort not the norm or first option.
22. Recreation Aotearoa supports the inclusion of transparency as an objective. Access charges must not cost more to collect than they generate, which has not always been a given in other realms. In other submissions to DOC consultations, Recreation Aotearoa has made many comments relating to poor revenue protection practices, slow uptake of technological solutions and a lack of user-centricity. For example, hut tickets can only be purchased at selected outdoor stores, in-person. These are as relevant to access charging mechanisms, as they are hut fees.
23. With regard to the connections with a wider work programme, Recreation Aotearoa is empathetic that synchronising various lines of effort will be difficult. However, we submit that the six programmes/projects/reviews listed in Section 1.4 need to be considered together and holistically to get the best outcome; and to avoid negative unintended outcomes.
24. By way of example, the newly elevated International Visitor Levy (IVL) has the potential to alleviate the cost pressures mentioned in the consultation document, in their entirety. It is conceivable that the application of only a portion of the IVL could solve the visitor asset and infrastructure deficits at the five specific sites, mentioned elsewhere in the document. Allowing for and applying access charges before bedding-in the proceeds of the IVL, appears to be 'putting the cart before the horse.'
25. Similarly, mechanisms such as car park charging, renewed concession fee arrangements, increasing hut fees and enhanced revenue protection, could result in access charging being rendered redundant and unnecessary. As such, Recreation Aotearoa urges DOC to proceed cautiously and incrementally, as it applies the various options available to it presently.

26. Of specific interest to Recreation Aotearoa, is the Future Visitor Network programme. It is our view that no fundamental decisions should be made as a result of this work, until it is clear what fiscal impact access charging and the numerous other mechanisms that we have mentioned have had time to bed-in. Unless a pause is applied, it could be the case that assets are removed or divested, only to find that there is ample funding to maintain them in future years.

Specific responses to Part 3:

27. Recreation Aotearoa disagrees with the assertion that existing Conservation legislation does not provide DOC with the tools to fairly spread costs across visitors to public conservation land, or between visitors and taxpayers. Various user-pays mechanisms such as facility charges, service charges, concession charges, and car-parking charges, already exist. It is our observation that the implementation and efficient use of these mechanisms could be greatly improved and that enhanced revenue protection practices could be implemented. At their current level of utilisation, they generate \$24m p.a. in revenue. Recreation Aotearoa submits that even without legislation changes, that figure could be materially increased.

28. Recreation Aotearoa acknowledges that while the International Visitor Levy does not reside with what would strictly be termed Conservation legislation, it does not receive due regard in this Section. The scope and application of IVL funding, under the new settings, is yet to be bedded-in and holds enormous potential for the funding of Conservation in New Zealand.

29. Recreation Aotearoa acknowledges the increased popularity of Short Walks on public conservation land and celebrates the numerous benefits that they afford to New Zealanders and international visitors, alike. However, we submit that a far simpler mechanism for extracting revenue from our Short Walk network would be to implement car-parking charges. This mechanism would not require legislative reform and would have the added environmental benefit of encouraging alternative forms of transport such as car-pooling and cycling.

30. Recreation Aotearoa acknowledges and empathises with the observation that various user-groups unevenly generate revenue via mechanisms such as hut fees or concessionaire charging. However, we observe this reality of recreation provision elsewhere. For example, Councils contend with the fact that, for example, Sports like football are much easier to cater to than Cycling undertaken in a velodrome. It is a widely accepted tenant of public provision of recreation opportunities, that it is not strictly or proportionally user-pays.
31. Recreation Aotearoa agrees that many DOC facilities are not fit to cope with the summer peaks of international visitors. We have observed and highlighted this problem, which is wider than public conservation land, since as far back as 2016. Recreation Aotearoa was a proponent of what subsequently became the International Visitor Levy, long before it was established in law. As such, we submit that the IVL is in existence to alleviate exactly the problems identified in 3.2.1. The proper and efficient utilisation of the proceeds of the IVL is an obvious first step to take, long before the application of an access charge.

Specific responses to Part 4:

32. Recreation Aotearoa submits that in all three of the options presented in 4.1, there is a lack of regard given to the various other mechanisms already in place or being developed, such as car-park charging or the IVL. It is misleading to present and consider these three narrow options, in isolation.

Specific responses to Part 5:

33. Recreation Aotearoa submits our preference for Option C: Charge only international visitors
34. If all other Visitor Management and revenue collection mechanisms have been applied and the IVL is proven to be insufficient to resolve the shortfall, we support charging international visitors while ensuring New Zealanders continue to have free access to public conservation land. This approach aligns with the user-pays principle while recognising that New Zealanders already contribute through general taxation.

35. We wish to make it clear that our opposition to the imposition of access charging on New Zealanders, is stronger than our mild support for imposing access charging on international visitors. New Zealand's public conservation areas are a vital part of our national identity and collective well-being. Charging New Zealand citizens for access would create financial obstacles, particularly for families, young people, and those on lower incomes. This approach risks turning our shared natural spaces into exclusive domains rather than places for everyone to enjoy. Ensuring free and open access upholds the principle that public conservation land belongs to all of us. There would be a predictable and forceful resistance to the idea that New Zealanders are charged for access to their land that is being managed by DOC on their behalf.
36. Many Recreation Aotearoa members are not-for-profit outdoor education providers dedicated to promoting physical activity and fostering a strong connection with nature. These organisations already operate under significant financial pressures, including the high cost of concessions required to access public conservation land. At a time when concerns around physical inactivity, excessive screen time, and rising obesity rates are growing, it is more important than ever to support youth engagement with the outdoors. Introducing access charges would create further barriers to participation, exacerbating existing health and social challenges rather than addressing them.

Specific responses to Part 6:

37. Recreation Aotearoa submits its support for a principles-based approach for selecting sites at which an access charge could be imposed. Access charges should be targeted only to high-traffic locations where visitor impact is significant and where revenue can directly support site maintenance.
38. Locations should be selected based on clear criteria, including high biodiversity value, significant infrastructure pressures, and disproportionate use by international visitors. Community and stakeholder consultation must be a core component of deciding which areas access charges are imposed upon and their implementation.

Specific responses to Part 7:

39. Recreation Aotearoa submits our preference for Option B: More of the money should be invested within the region it is collected in. We note that this does not preclude achieving the objects of Option A, as it could be the case that the place in which the charge is collected has the most pressing needs of the broader region. Revenue should not be redirected to general DOC funding but remain dedicated to local infrastructure, track maintenance, conservation efforts, and visitor services.
40. A transparent funding model should be established, where local communities, iwi, and key stakeholders have input into spending decisions, to ensure clear benefits for conservation and visitor experience, as well as protecting social licence. Additionally, if access charging is introduced, DOC should publish an annual report on revenue collected and how it has been used. Transparency and public accountability must be embedded in revenue distribution.

Specific responses to Part 8:

41. Recreation Aotearoa submits its support for iwi and hapu and their enduring relationship to public conservation land particularly where that land has been gifted to the NZ public by iwi. We strongly encourage DOC to uphold its Te Tiriti o Waitangi obligations and actively protect the rights and interests of iwi as they relate to public conservation land.

Conclusion

42. Recreation Aotearoa acknowledges the challenges of funding conservation efforts but urges DOC to adopt a targeted, equitable, and transparent approach to access charging. We support charging only international visitors (Option C) and reinvesting revenue into the sites and regions where it was collected (Option B).
43. Additionally, we call for (a) a holistic funding review to ensure that DOC maximizes existing revenue streams before implementing access fees; (b) a clear, community-inclusive decision-making framework to determine access

charging sites; and (c) transparency and accountability in the allocation and use of collected funds.

44. We appreciate the opportunity to submit on this important issue and would welcome further engagement to ensure New Zealanders retain fair and affordable access to public conservation land.