

The Department of Conservation's Heritage and Visitors Strategy Feedback from the New Zealand Conservation Authority / Te Pou Atawhai o Aotearoa

1. The Authority provides this feedback following the publication of the Strategy, advising on areas of concern to the Authority, and thus conservation more widely.

What is DOC's role in relation to recreation and tourism?

2. Section 6(e) of the Conservation Act 1987 sets out the Department's function "to foster the use of natural and historic resources for recreation, and to allow their use for tourism." This function, however, is conditional, in that it can only be exercised "to the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation" [emphasis added].
3. The Authority considers that the legislation very clearly establishes a hierarchy of the Department's functions, with conservation taking precedence over recreation and tourism. This hierarchy of functions is only cursorily addressed in the Strategy.

Goals: 'Protect', 'connect', and 'thrive'

4. The Authority strongly supports the approach in the Strategy that the goal to 'protect' takes precedence over the goals to 'connect' and 'thrive'. The Authority, however, is concerned that this hierarchy of goals is significantly undermined by the Strategy's failure to effectively embed this approach throughout the document.
5. The Department's new 'thrive' goal is focused on assisting regional development, and proactively developing new and innovative commercial tourism experiences for visitors. While the Authority supports regional development and allowing the use of natural and historic resources for tourism, where such activity is consistent with conservation, this goal (as written) significantly widens the Department's role beyond its current statutory mandate.
6. The Authority is concerned that the Strategy appears to assume that 'connect' and 'thrive' will equate to 'protect'. At times, it is vital to the Department's primary purpose, that 'protect' must trump 'connect' and 'thrive'. Additionally, the 'thrive' goal should reflect the Department's primary purpose by including a thriving natural environment (e.g. biodiversity, ecosystems, and species), and a thriving cultural environment.
7. The Authority finds that the language used in relation to the Department's conservation function is not robust enough to reflect its relative importance. The Authority is concerned that the repeated lack of acknowledgement of the Department's legislated role and priorities in conservation, will influence the views of staff, stakeholders, the wider public, and, most significantly, decision-makers at place.
8. Increased development and promotion of recreation and tourism activities are likely to result in increased pressures and, therefore, negative conservation outcomes. The Department, in fostering recreation and allowing for tourism, must establish, measure,

and maintain environmental-bottom-lines; to ensure that any use of conservation lands is consistent with conservation.

Implementation: Risks

9. **Statutory management plans** are integral to how the Department operates, however, there is little mention of them throughout the Strategy. No statement is made in the Strategy of the Department's intention to engage in timely development and review of the statutory planning documents, needed to provide long term integrated planning for public conservation lands and waters. This is of great concern to the Authority. In remaining silent on the importance of statutory management plans, the Strategy fails to identify and engage in areas of decision-making where either interests and/or values may be compromised, and that these decisions must favour conservation over the other interests promoted by the Strategy.
10. **Destination management plans** have, in the past, been driven by the tourism industry, and primarily focus on accommodating tourism growth and improving visitor experiences, rather than addressing environmental and host community concerns. While such plans may be a useful tool for the Department to influence what recreation and tourism activities are allowed on public conservation land, the Authority has significant concern that, with the lack of clarity in this Strategy, the Department may be susceptible to industry influence at the expense of implementing its statutory mandate. It is the Authority's view that integrated statutory planning for public conservation lands and waters should inform the Department's engagement in non-statutory destination management planning.
11. **Monitoring** and measurement of conservation outcomes will be vital to making data informed decisions. Data on the environmental effects of recreational activity and visitors is required in order to incorporate limits for negative impacts into decision-making around recreation and tourism.