

Exploring charging for access to some public conservation land

Discussion document | He pepa kōrero

November 2024 | Noema 2024



Department of
Conservation
Te Papa Atawhai

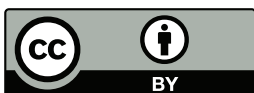


**Te Kāwanatanga
o Aotearoa**
New Zealand Government

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Exploring charging for access to some public conservation land

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He Kupu Takamua nā te Minita

Toitū te marae ātea a Tāne Mahuta me Hineahuone

Toitū te marae ātea a Tangaroa me Hinemoana

Toitū te taiao.

Ko tā Te Papa Atawhai he whakahaere i te whenua, tata ki te hautoru o tō tātou whenua ātaahua e whakahaerehia ana, ko tāna anō he whakahaumarū i te taiao, ngā taonga tuku iho, me ētahi o ngā horanuku rongonui rawa i te ao. Mēnā ka taurikura te taiao, ka taurikura hoki tātou katoa. E noho ana te taiao ki te pokapū o te ōhanga o Aotearoa – arā, e whakawhirinaki ana te tāpoi, te ahuhenua, te mahi ngahere, te mahi ika, te tūāhanga, te pūngao, ngā rauemi, me te tākaro ki te taiao. Ka tautoko te tāpoi whāomoomo i ngā ōhanga ā-rohe mā ngā mohohā e hāngai ana ki te mahi tāpoi me ngā manuhiri e whakapau pūtea ana i ngā hapori. E tika ana kia whakaritea he pūnaha whāomoomo e whaitake ana mō Aotearoa whānui hei whakahaumarū i te taiao mō ngā uri whakahaere.

Kia pai ai tā mātou whakatutuki i taua wawata, nōnakuanei au pānui atu ai i ōku whakaarotau mō te Kōpaki Whāomoomo, tae ana ki te waihanga i ngā ara whiwhi pūtea e hou ana, te whakatikatika i ngā utu o te whāomoomo, te tuku tōtika i te pūtea ki ngā putanga whāomoomo he nui te wāriu, te whakapakari i ngā hononga ki ngā iwi (me ngā hapū), me te whakatika i te hātepe whakamāmā.

Mā te whakarite i ngā utu uru ki ētahi o ngā whenua whāomoomo tūmatanui, ka hua mai he āheitanga hei āwhina i tā mātou whakatinana i ēnei whakaarotau. Kua horapa haere ngā utu uru ki tāwāhi i te mea he rautaki pai. Mēnā ka haere tonu tēnei kaupapa, ka puta mai ko tētahi ara hou e pakari ana hei āwhina i te utu i tā tātou tiaki me tā tātou whakapai ake i ngā whenua whāomoomo tūmatanui me te whai atu i tētahi ara tōkeke kia mātua whakaritea rā te tautoko mai a ngā manuhiri katoa ki te pupuri tonu me te whakapai ake i ngā wāhi e haere ai rātou.

Ko te uru atu ki ngā whenua whāomoomo tūmatanui he mea tino nui mō ō mātou hoa haere i raro i te Tiriti o Waitangi, he mea āwhina i tā rātou whakatinana i tō rātou tūranga hei katiaki, tā rātou whakanui i te ahurea, tā rātou kawē i te tikanga, me ētahi atu haepapa. E hīkaka ana ahau ki te whakatau i ngā whakatakoto a te Kāwanatanga ki te taha o ngā iwi kia pai ai tā te Karauna whakatinana i ōna haepapa i raro i te Tiriti.

E hihiko ana te ngākau ki te tiroiro i ā koutou whakahoki kōrero mō ngā panonitanga kua whakatakotoria ki roto i tēnei tuhinga – he wāhanga tēnei tuhinga matapaki o tā te Kāwanatanga mahere whānui mō te whakahou i te pūnaha whāomoomo kia tika tonu ai tāna whakahaumarū i ngā taonga taiao o Aotearoa mō ngā whakatupuranga e haere ake nei.

Mauri ora, nā



Hōnore Tama Potaka

Te Minita Whāomoomo

Ministerial Foreword

Toitū te marae ātea a Tāne Mahuta me Hineahuone
Toitū te marae ātea a Tangaroa me Hinemoana
Toitū te taiao.

The domain of Tāne Mahuta and Hineahuone endures
The domain of Tangaroa and Hinemoana endures
The environment endures.



The Department of Conservation Te Papa Atawhai manages nearly a third of our beautiful country and protects some of the world's most iconic landscapes, nature and heritage. When nature thrives, we all do. Nature is central to New Zealand's economy – tourism, agriculture, forestry and fisheries, infrastructure, energy, resources, sport and recreation all depend on nature. Conservation-related tourism supports regional economies through jobs and visitors spending money in communities. New Zealand deserves a fit-for-purpose conservation system that protects nature for future generations.

To achieve and deliver this, I recently announced my priorities for the Conservation Portfolio, which include generating new revenue and recalibrating costs for conservation, targeting investment into high-value conservation outcomes, strengthening relationships with Iwi and Hapū and fixing the concessions process.

Charging for access to some public conservation land provides an opportunity to realise these priorities. Access charges are common overseas for good reason. If progressed, they would add a powerful new way to help fund the upkeep and improvement of public conservation land in a fair way that ensures all visitors contribute towards maintaining and improving the places they visit.

Access to public conservation land is essential for our Tiriti o Waitangi / Treaty of Waitangi partners being able to better fulfil their roles as kaitiaki, to engage in cultural practices, to exercise tikanga and other responsibilities. I look forward to working through the Government's proposals with Iwi to ensure the Crown upholds its Treaty responsibilities.

I am excited to see your feedback on the proposed changes in this document – this discussion document is part of the Government's wider plan to modernise the conservation system so it continues to protect New Zealand's natural treasures for future generations.

Mauri ora

A handwritten signature in blue ink that reads "Tama Potaka". The signature is fluid and cursive, written over a light blue circular stamp.

Hon Tama Potaka
Minister of Conservation

Modernising the conservation system

The Government wants to modernise the conservation system to enhance the care and protection of Aotearoa New Zealand's natural, historic and cultural heritage.¹ In order to do this, the Government has set four clear priorities for the Conservation Portfolio.

<p>Fix concession processes</p> <p>We will reduce red tape to make it easier for businesses, researchers and others to undertake mahi and other activities on public conservation land.</p>	<p>Generate new revenue and recalibrate costs</p> <p>We will strengthen conservation efforts by generating new revenue and improving outcomes from our investments in conservation.</p>
<p>Strengthen relationships with Iwi for better conservation outcomes</p> <p>We will work closely with Iwi and others to meet our Tiriti o Waitangi/Treaty of Waitangi responsibilities and achieve shared goals for conservation and kaitiakitanga.</p>	<p>Target investment into high-value conservation outcomes</p> <p>Our mahi will identify and strengthen protection of high-value conservation areas that deliver the best outcomes for biodiversity and recreation.</p>

To deliver on the priorities of generating new revenue, recalibrating costs and fixing concessions processes, the Government is releasing two discussion documents:

<p>Exploring charging for access to some public conservation land</p> <p>Seeks feedback on the proposal to introduce charges for access to some public conservation land and the main principles for any charges</p>	<p>Modernising conservation land management</p> <p>Seeks feedback on proposed updates to the concessions and planning system to make it more efficient and responsive.</p>
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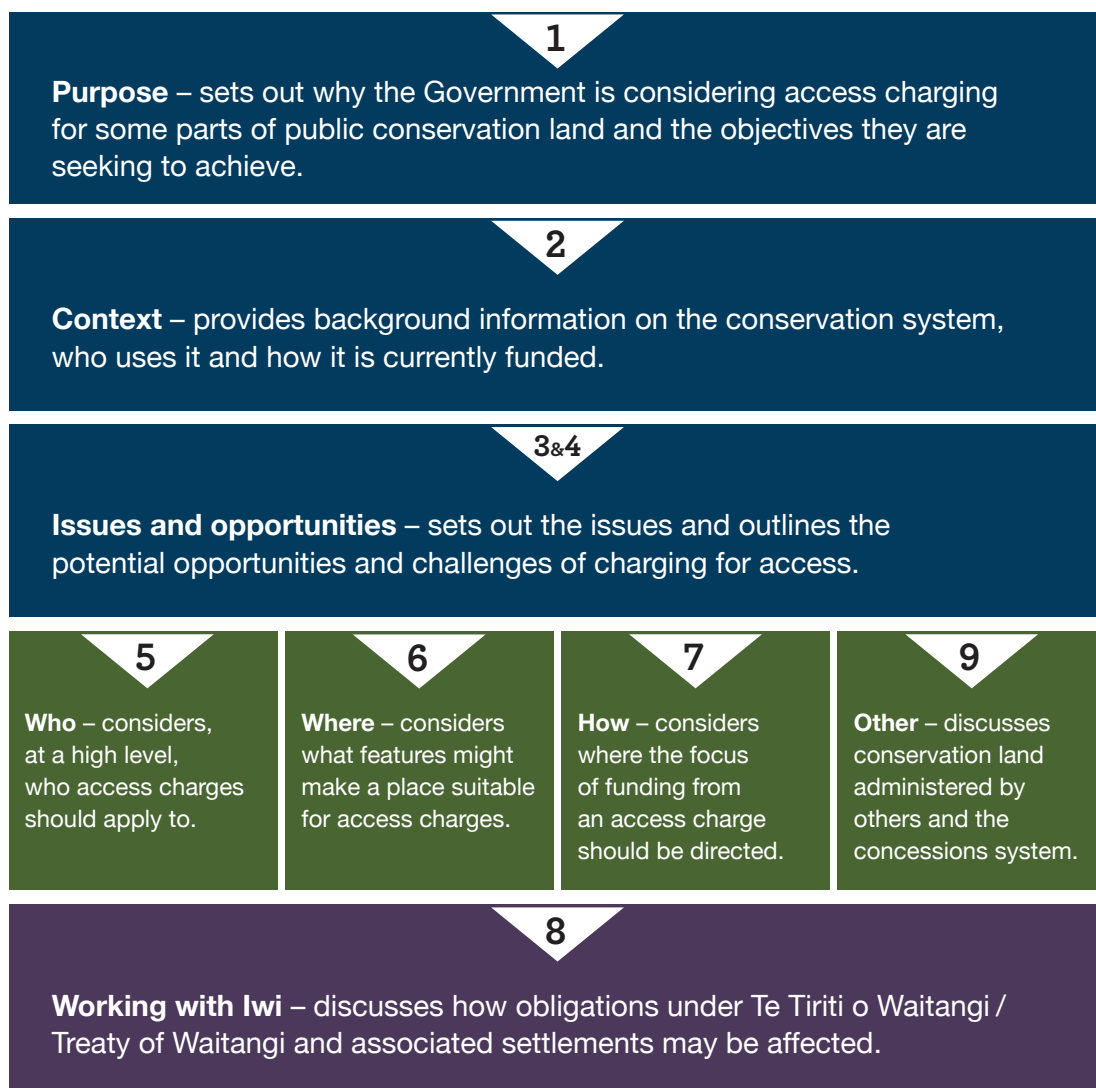
The Government has a wider work programme underway to support the achievement of all its conservation priorities, including protecting and enhancing New Zealand's unique biodiversity and realigning the visitor network so it continues to meet the needs of New Zealanders now and in the future.

¹ The conservation system is the system that supports conservation in New Zealand and includes the Department of Conservation, community groups, not-for-profit organisations and volunteers.

Part 1

Purpose of this document

The Government would like feedback on the proposal to introduce charges for access to some public conservation land and the main principles for any charges. The diagram below summarises the different parts of this document.



Iwi engagement

During the public consultation period, the Department of Conservation Te Papa Atawhai (DOC) will also undertake targeted engagement with Iwi (and Hapū) through meetings (virtually or in place) and regional hui.

It is anticipated there will be significant interest from Māori in this topic. Māori have ancestral responsibilities relating to land and marine spaces, including public conservation land (PCL). Access to public conservation land is essential to being able to fulfil roles as kaitiaki, to engage in cultural practices, to exercise tikanga and other responsibilities.

1.1 What are access charges?

Access charges are charges made to enter a specific area. Access charges in protected natural areas (e.g. national parks) can take various forms. For example:

- a per person fee to enter a protected natural area (single ticket or pass)
- a per vehicle fee to drive on a particular road into a protected natural area
- a per person fee to walk or ride on a particular track.

Governments around the world use access charges to help fund the maintenance, operation and improvement of visitor attractions, such as national parks and museums. These charges are common in areas that have significant pressure from international tourists. For example, visitors to Australia's Kosciusko National Park pay NZ\$31 per vehicle to enter the park.

Current legislation does not clearly enable the use of access charges.² This would likely require changes to the Conservation Act 1987, National Parks Act 1980 and Reserves Act 1977.

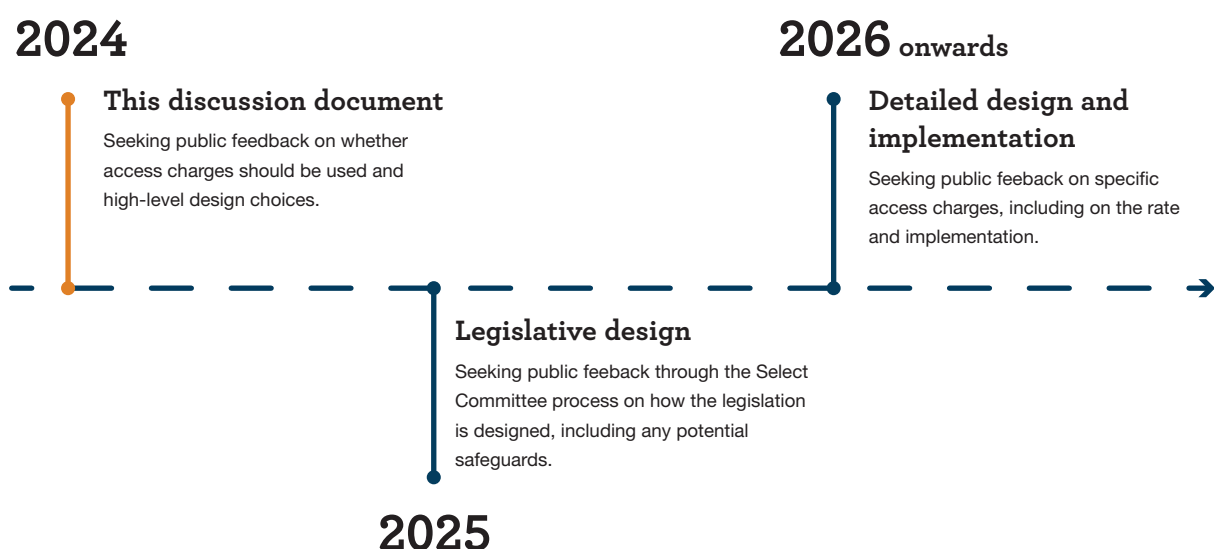
Access charges are a big opportunity to solve some of the issues at our most popular places. We discuss this further in Part 6.

1.2 What the Government is looking for feedback on

The Government is seeking your feedback on whether access charges are a good idea and the main design principles for an access charge, including:

- **Who should be charged** (Part 5) – New Zealand visitors, international visitors, or both? What discounts should apply?
- **Where access charges should be used** (Part 6) – what 'type of places' on public conservation land would be suitable for access charging, and should any be excluded?
- **How the money should be used** (Part 7) – should a reasonable proportion of the access charge revenue be spent on the place where it was charged?

Following feedback from this consultation and if the Government decides to progress access charges, other processes will be undertaken for public consultation and input (including on the setting of any rate). An indicative timeline of this process is below:



² See section 17 of the Conservation Act 1987 and section 4 of the National Parks Act 1980. Limited provisions exist within the National Parks Act 1980 and the Reserves Act 1977 to charge some admission fees, but no clear and consistent framework exists across the Acts.

1.3 Objectives for access charges

The objectives below have been used to assess the access charging design options in this document.³

Objective	Description
Equity	Where identifiable people or groups benefit from public conservation land, they should make a fair contribution towards its upkeep and improvement. This ensures equity between users of public conservation land, and between the taxpayer and users. Equity is also achieved by ensuring that vulnerable people are not disadvantaged through the imposition of a charge.
Enhanced visitor experiences	Access charges should improve and enrich visitor experiences on public conservation land. This includes funding appropriate facilities, educational programmes and conservation efforts to ensure visitors have a high-quality experience and gain a deeper appreciation for the natural and cultural heritage on public conservation land.
Accessibility	Access charges should be considered alongside the Government's wider objective to support New Zealanders to connect with nature and should be used to promote access for New Zealanders where possible. This includes supporting Māori to fulfil their ancestral responsibilities in relation to public conservation land.
Simplicity and transparency	Access charges should be straightforward, practical, easy to understand and collect.

1.4 Connections to the wider work programme

This discussion document is part of the Government's wider plan to modernise the conservation system to enhance the care and protection of New Zealand's natural, historic and cultural heritage. This includes projects such as:

- **Modernising Conservation Land Management** – aims to make conservation land management more effective and efficient through improvements to management planning, concessions, amenities areas and land exchange and disposal. This is currently being publicly consulted on. You can have your say here: www.doc.govt.nz/modernising-conservation-land-management-consultation.
- **Conservation Revenue Action Plan** – a plan to grow funding for conservation, including the recently announced International Visitor Conservation and Tourism Levy (IVL) increase and exploring how paid car parking could fit into DOC's revenue toolkit.
- **Future Visitor Network** – aims to reshape DOC's visitor network to better meet visitor needs and improve its financial sustainability. Additionally, it will establish clear processes for divesting assets, collaborating with third parties and reviewing service standards.
- **Financial Sustainability Review** – exploring long-term options to improve DOC's financial sustainability. It will do this by clearly identifying the Government's conservation priority outcomes, recognising future costs, and ensuring investments are targeted towards where they will make the biggest impact.

³ The objectives were derived from the following sources:

- The Treasury. (2017). Guidelines for Setting Charges in the Public Sector. <https://www.treasury.govt.nz/publications/guide/guidelines-setting-charges-public-sector>.
- Department of Finance (Australia). (2023). Australian Government Charging Framework. www.finance.gov.au/government/managing-commonwealth-resources/implementing-charging-framework-rmg-302/what-australian-government-charging-framework.

- **Nature Investment Prospectus** – developing a tool to make it easy for others to contribute to outcomes for nature by showcasing a selection of priority biodiversity work which are investment-ready projects.

The **Milford Opportunities Project** has explored options for maintaining a world class visitor experience in Milford Sound Piopiotahi while ensuring conservation values are protected, including the potential for an international visitor access charge. The Government will be considering this idea as part of the broader questions put forward in this discussion document.

The Government is not seeking feedback on any of this wider work as part of this discussion document.

1.5 How to have your say

The Government would like your feedback on the ideas proposed in this discussion document. The deadline for providing feedback is **5 pm, Friday, 28 February 2025**.

1.5.1 How to comment on this discussion document

You can have your say by:

- completing the survey on our website at: www.doc.govt.nz/access-charging-consultation.
- emailing your submissions to us at: accesschargingconsultation@doc.govt.nz.
- mailing your submission to us at:
 Department of Conservation
 18 – 32 Manners Street
 PO Box 10420, Wellington 6140
 Attention: Access charging consultation submissions.

Where possible, we prefer receiving survey submissions. If you are emailing us an attachment, we prefer Microsoft Word or searchable PDF formats. Inclusion of any relevant facts, figures, data, examples and documents to support your views would be appreciated.

Submissions received after the deadline will only be considered at the discretion of the Director-General of Conservation.

1.5.2 Summary of submissions and privacy

After submissions close, DOC will publish a summary of submissions on its website (www.doc.govt.nz).

All submissions are subject to the Official Information Act 1982 and can be released, if requested, under that Act. If you have any objection to the release of any information in your submission, please set it out clearly in your submission. Clearly indicate which parts you consider should be withheld, together with the reasons for withholding the information and the grounds under the Official Information Act 1982 you believe apply. DOC will consider this when making any assessment about the release of submissions.

Please clearly indicate in your submission if you do not wish your name, or any other personal information, to be disclosed in any summary of submissions or external disclosures. Refer to DOC's privacy statement for further information.⁴

1.5.3 Consultation with stakeholders

DOC will hold meetings with key stakeholders that have an interest in the issues under review and invite individuals and groups to provide written submissions.

⁴ See DOC's privacy statement at www.doc.govt.nz/footer-links/privacy-and-security/.

1.6 What happens next

DOC will review all the feedback on this document and report back to the Minister of Conservation with recommendations. Your feedback will help to shape DOC's recommendations.

After the consultation period, the Government will decide whether, and how, to proceed with changes to introduce access charges. The Government is aiming to pass a Conservation Amendment Bill by the end of the current parliamentary term.

Part 2

Context – the conservation system

DOC is the lead government agency for the conservation system and manages roughly a third of New Zealand's land mass. DOC protects iconic and unique landscapes, nature and heritage on behalf of all New Zealanders. These things draw people from around the world to visit New Zealand. Prior to COVID-19, conservation-related tourism was worth \$4.3 billion per year,⁵ and a more recent estimate has put it at \$3.4 billion per year.⁶

2.1 Obligations under the Treaty of Waitangi

Under section 4 of the Conservation Act, the Government (including DOC) must work in a way that gives effect to the principles of Te Tiriti o Waitangi/Treaty of Waitangi (Treaty).

Access to public conservation land and waters is important for Iwi. Iwi (and Hapū) have ancestral responsibilities relating to land and marine spaces, including public conservation land. Access to public conservation land is essential to being able to fulfil roles as kaitiaki, to engage in cultural practices, to exercise tikanga and other responsibilities.

DOC has statutory commitments arising from Treaty settlements. As a result of these settlements, some Iwi and post-settlement entities own or administer significant areas of former public conservation land and may have co-management responsibilities.

Part 9 discusses how the Government might give effect to its responsibilities under the Treaty and Treaty settlements.

2.2 One third of New Zealand is public conservation land

Land owned by the Government and administered by DOC is known as 'public conservation land'. This includes roughly one third of New Zealand (over 8 million hectares) consisting of 13 national parks, many conservation parks, several thousand reserves and other protected areas.

These places are home to many of the country's major tourist attractions and iconic natural geographic features, such as Mautohe Cathedral Cove, Tongariro National Park, Milford Sound, Piopiotahi and Aoraki Mount Cook. They include many sites of cultural significance for Māori. The scale and diversity of public conservation land makes it important for both biodiversity and outdoor recreation in New Zealand.

Conservation land like reserves can also be administered by other groups, such as councils and Iwi. This is discussed further in Part 8.

2.3 DOC has a large and varied visitor network

DOC is New Zealand's largest provider of visitor activities. One of DOC's roles under the Conservation Act is to foster recreation and allow for tourism, where it is consistent with conservation outcomes. DOC is responsible for maintaining a visitor network of more than 2,000 buildings and huts, 2,015 toilet blocks, 300 campsites, 13,000 structures and 14,600km of track. DOC is supported in delivering the visitor network by Iwi, community and recreation groups, and businesses.

The Government wants to ensure New Zealand and international visitors can connect to nature and cultural heritage, while protecting it for future generations, because doing so provides the following benefits, amongst others.

⁵ This was an indicative internal estimate of the economic value of tourism activities on public conservation land aggregated from the regions. Estimates were calculated using Ministry of Business, Innovation and Employment databases, which have been discontinued.

⁶ The updated figure takes into account the period between 2020 and 2023 when international visitor numbers were much lower.

- **Conservation benefits** – when more people spend time outdoors, they feel a stronger connection to nature and get more involved in conservation efforts.
- **Economic benefits** – the visitor network boosts the economy through visitor spending in nearby areas and by supporting businesses.
- **Improved health and wellbeing** – getting active in the outdoors brings both physical and mental wellbeing benefits.
- **Strengthened national identity** – connection with nature is a fundamental component of New Zealand’s national identity.

In 2022/23, around 81% of New Zealanders visited public conservation land at least once, and around half of New Zealanders visited once a month.⁷ Between July 2023 and July 2024, 49% of international visitors said they visited one or more national parks during their time in New Zealand.⁸

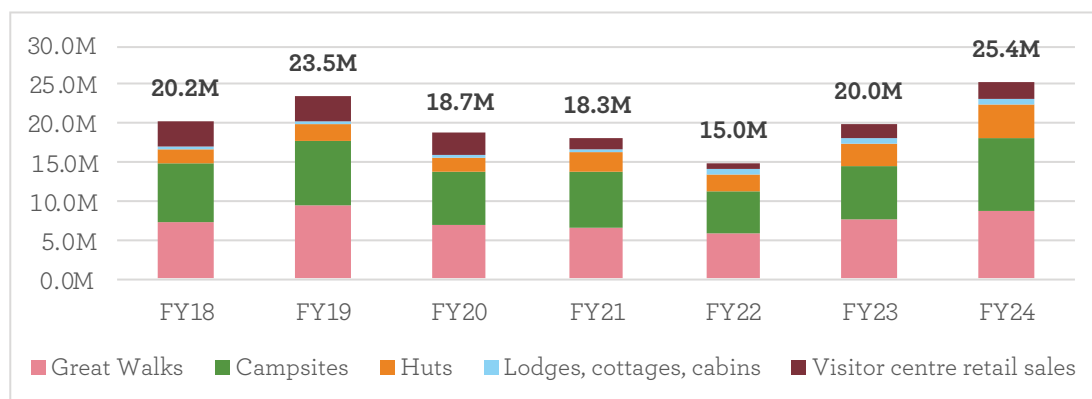
2.4 How the conservation system is funded

In 2023/24 (the July 2023 to June 2024 financial year) DOC’s total budget was \$644.2 million (excluding Jobs for Nature funding). Of this, \$233.1 million is used to support recreational activities and maintain the visitor network and \$315.7 million for biodiversity work. The Government provides around 83% of the funding for DOC, while 17% comes from other sources and third parties.

2.4.1 Existing visitor fees

The Conservation Act and National Parks Act allow the Government to charge a reasonable fee for the use of a facility like a hut, campsite or car park.⁹ Money from these fees, \$25.4 million for 2023/24, contributes towards the cost of the visitor network. A breakdown of recreation revenue is shown in Figure 1.

Figure 1: Recreation revenue 2018 – 2024 (\$ million)



2.4.2 International Visitor Conservation and Tourism Levy

Conservation also receives funding from the IVL, a levy paid by international visitors to New Zealand. The IVL funds investments into conservation and tourism projects, such as kākāpō recovery, the Tongariro Alpine Crossing and reopening Mautohe Cathedral Cove. In 2023/24 the IVL raised \$62.5 million, split 50/50 between tourism and conservation.

7 Department of Conservation. (2023). Understanding 2022/23 visitor activity. www.doc.govt.nz/globalassets/documents/about-doc/role/visitor-research/understanding-2022-23-visitor-activity.pdf.
 8 Ministry of Business, Innovation and Employment (MBIE). (2024). International Visitor Survey. Retrieved October 8, 2024, from <https://teic.mbie.govt.nz/teiccategories/datareleases/ivs/>.
 9 Section 17, Conservation Act 1987; section 51A, National Parks Act 1980.

On 1 October 2024 the IVL was increased from \$35 to \$100 per person. Just over half of all international visitors pay the IVL when they pay for their visa or New Zealand electronic Travel Authority (NZeTA) to enter the country.¹⁰ People from Australia and most Pacific Islands do not pay the levy. There were 1.3 million Australian visitors to New Zealand in 2023, of whom 43% indicated they had done a short walk under three hours and many visited a national park during their stay.¹¹

2.4.3 Concessions system

All activities for financial gain on public conservation land (except for mining activity)¹² require a concession under the Conservation Act. A concession is a permit, lease, licence or easement that authorises activities on or access through public conservation land. Examples of activities that require a concession include guiding, transport, accommodation and ski fields. Under the legislation, the Government must be satisfied that conservation values will be protected before granting a concession.

Businesses and organisations that hold concessions are required to pay several types of fees, shown in Table One below.

Table 1: Concession fees and examples

Type of fee	Description	Examples (excluding GST) ¹³
Activity	A premium paid for the privilege of operating commercial activities on public conservation land – \$26.8 million for 2023/24.	<ul style="list-style-type: none"> A shuttle operator providing transport for the Tongariro Alpine Crossing must pay \$4.10 per person transported. A guiding operator providing guiding services on the Tongariro Alpine Crossing must pay \$16 per person per day.
Departmental (administrative)	Recovers some of the costs relating to administration of the concessions system – \$2.4 million for 2023/24.	<ul style="list-style-type: none"> Simple non-notified concession applications require a minimum \$2,065 application fee. A management fee between \$250 – \$500 is required annually, plus monitoring fees depending on concession type.
Departmental (environmental or visitor impact)	Context specific fee to cover some of the costs relating to mitigating the impact of visitors on the environment.	<ul style="list-style-type: none"> A guiding operator for the Tongariro Alpine Crossing must pay a ‘community contribution fee’ of \$3 per visitor. The money raised contributes towards the cost of special rangers, monitoring and road/track maintenance. These fees have not yet been in operation for a full financial year. A cruise ship operator wishing to go to the Subantarctic Islands, which are national nature reserves, must pay a ‘visitor impact management fee’ of around \$400 per passenger. This money is used for the operational management of the Subantarctic Islands, with a focus on maintenance of infrastructure and biodiversity/biosecurity requirements. Revenue for 2023/24 was around \$880,000.

¹⁰ MBIE. (2024). International Visitor Survey.

¹¹ MBIE. (2024). International Visitor Survey.

¹² See section 170(3), Conservation Act 1987.

¹³ For more information, see

www.doc.govt.nz/get-involved/apply-for-permits/managing-your-concession/ongoing-concession-fees/.

The Government is aware that businesses and community groups want shorter processing times and a more user-friendly concessions system. The Government aims to deliver this by modernising the concessions system, including proposed changes to how concession fees are set. See the 'Modernising Conservation Land Management' discussion document for more information on the proposals and to have your say at www.doc.govt.nz/modernising-conservation-land-management-consultation.

2.4.4 Other revenue

In addition to the revenue sources above, DOC also receives significant financial and non-financial contributions from businesses, community groups and donors. In 2023/24 DOC received \$3.4 million from national commercial partners (e.g. Air New Zealand) as contributions towards conservation projects.

These figures do not include the various non-financial support DOC gets from its partnerships with community groups, and volunteer hours that contribute towards its conservation work.



Part 3

Issues

The Government has rising costs relating to maintaining and improving public conservation land. These costs include sustaining DOC's ageing visitor network and preventing biodiversity decline. Investment is needed to sustain the visitor network so that it is safe, accessible and delivers quality experiences. 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. Law change is needed so that more visitors who benefit from using public conservation land can help pay for its upkeep and improvement. This could help the Government to maintain a high-quality visitor network that deepens visitors' connection to nature.

This part discusses how fair current visitor charges are, before addressing funding pressures related to the visitor network and biodiversity decline.

3.1 Costs could be more fairly shared among visitors

Short walks and day walks are increasing in popularity, particularly for international visitors. Between July 2023 and July 2024, nearly 64% of international visitors did a walk or tramp while in the country, 47% of these did a short walk between 30 minutes and 3 hours long.¹⁴ Of the New Zealanders who visited public conservation land, 42% did a short walk (less than 3 hours long).¹⁵

Maintaining facilities such as tracks, bridges and toilets is a significant cost for DOC. Tracks used for short walks and day walks tend to cost more annually compared with tramping tracks because they are maintained to a higher standard. For example, DOC estimates that a short walk like the Hokitika Gorge Walk costs around seven times more per kilometre than a standard tramping track in yearly maintenance.¹⁶

No clear legal framework exists across the Conservation Act, National Parks Act and Reserves Act to charge visitors who do not use an overnight facility or concessionaire (e.g. shuttle). This has led to various approaches being used across the country, often with inequitable outcomes. For example:



Busy car park, Aoraki Mount Cook.
Photo: David Dittmer

- Approximately 25% of walkers doing the Tongariro Alpine Crossing (Tongariro National Park) use private transport and are not required to pay any fee for the use of any facilities, such as the track and toilets. The other 75% of visitors use a commercial shuttle service and must pay a \$3 community contribution fee that partly contributes towards facilities.
- Over three-quarters of summer visitors to Mueller Hut (Aoraki Mount Cook National Park) are day walkers who are not required to pay to use the hut facilities such as the toilet. An adult visitor staying overnight is required to pay \$50 per night. An additional helicopter trip was required to empty the toilet at Mueller Hut in February 2024, at a cost of over \$18,000.
- Roughly 17% of visitors using the Heaphy Track (Kahurangi National Park) are mountain bikers. A mountain biker on the Heaphy Track can complete the Great Walk in 1 or 2 days, so they might contribute up to \$44 in hut fees. Walking the Great Walk takes up to 5 days, costing a visitor up to \$264 in hut fees. Significant investment has been made in the Heaphy Track in the past decade to cater for mountain bikers, such as the installation of larger bridges and upgrading the track.

¹⁴ MBIE. (2024). International Visitor Survey.

¹⁵ Department of Conservation. (2024). Understanding 2023/24 Summer Activity. www.doc.govt.nz/globalassets/documents/about-doc/role/visitor-research/understanding-2023-2024-summer-activity.pdf.

¹⁶ This estimate is based on an averaged annual cost over 10 years. Includes personnel costs, expenses and depreciation. It does not include costs associated with bridges and other structures.

3.2 Looking for smarter ways to address growing pressure on DOC's ageing visitor network and biodiversity work

3.2.1 International visitor numbers have increased dramatically since 1987

New Zealand's natural environment is a big drawcard for international visitors. When DOC was created in 1987, New Zealand had 844,000 international arrivals. This number has grown by roughly 250%. In 2023, New Zealand had 3 million international arrivals, a number trending towards the 2019 pre-COVID-19 peak of 3.9 million international visitors.¹⁷ Around half of all international tourists will visit a national park during their stay. Visits tend to be concentrated in a few highly popular spots, with many international visitors preferring to travel in summer. For example, 18% of international visitors between July 2023 and July 2024 reported going to Te Rua-o-Te-Moko Fiordland National Park and 21% went to Aoraki Mount Cook National Park.¹⁸ International visitors also generally have higher expectations for the quality of facilities.

Many DOC facilities are not set up to deal with the summer peaks now being experienced, leading to negative impacts on natural, cultural and heritage values. Overcrowding also degrades the quality of the visitor experience.

3.2.2 Severe weather events and their impact on DOC facilities is increasing

Climate change is both increasing the frequency of extreme weather such as heavy rainfall and flooding, and the intensity, making weather more severe.¹⁹ Because of this the Government expects costs associated with extreme weather to continue to increase, requiring money to be reprioritised from other conservation work.

For example, following the severe storms that hit the North Island in 2023 around 42% of DOC's sites in the affected regions required repair or replacement. This included damage to more than 450 visitor sites, and 18,000 assets including signage, tracks, car parks and boardwalks. As a result, DOC's storm damage costs rose to around \$5 million in 2023 and \$7.1 million in 2024, compared with \$1.2 million on average in the 4 years before 2023. Severe weather also cost us \$1.6 million in lost revenue from booking cancellations.



Diggers Hut after a storm. Photo: Benjamin Pigott

¹⁷ MBIE. (2024). International Visitor Survey.

¹⁸ MBIE. (2024). International Visitor Survey.

¹⁹ Ministry for the Environment. (2023). The science linking extreme weather and climate change. Retrieved October 8, 2024, from <https://environment.govt.nz/news/the-science-linking-extreme-weather-and-climate-change/>.

3.2.3 Assets are more costly to replace

DOC does not have enough funding to maintain the assets it has, even with the help of community partners. DOC is behind in the renewal and replacement of assets by around \$25 million per year. Around 50% of huts are more than 30 years old.

The cost to replace assets is now far higher than when they were constructed, even when adjusted for inflation. This is due to factors such as technological advancements, higher building standards, increased construction costs and stricter safety requirements. Examples of higher standards introducing new costs include double glazing and swing bridge redundancy.²⁰

Historic underinvestment in DOC's assets means more maintenance and replacements will be needed in future, at a higher cost. For example, the Milford Opportunities Project Business Case estimated that updating and replacing basic utilities and visitor infrastructure in Milford Sound Piopiotahi is going to cost over \$110 million in the next decade.²¹

3.2.4 Declining biodiversity

Experiences with nature, including with our unique plants and animals, is a key part of a visitor's experience on public conservation land. New Zealand's ecosystems are declining and nearly 4,000 native species are either at risk or threatened with extinction. This is being driven by invasive species, climate change, land use shifts and pollution.

DOC is only just 'holding the line' at present and cannot do this everywhere. More investment is needed to see nature on public conservation land thrive rather than decline. If nothing changes, New Zealand might lose some of its unique species and ecosystems, significantly degrading the value of visiting public conservation land for everyone.

3.3 Consultation questions

#	Questions
1.	Do you agree with the issues and how they have been presented?
2.	a. Have any issues been missed? b. Do you have any examples or data that demonstrate your view on the issues?

²⁰ Cable structures (i.e. swing bridges) are now required to have additional cabling (providing structural redundancy) to reduce safety risks to users, this affects new bridges and existing bridges. New huts are required to have double glazing installed rather than traditional single glazing.

²¹ These projects include upgrades to wastewater and potable water, the electricity cable and power supply; new visitor protection refuges; new toilets; decontamination of the Cleddau Flat; and roading improvements at Cleddau Flat. The projects were expected to be completed between 2027 and 2034.

Part 4

Access charging – part of the solution?

This part outlines options considered to address the issues outlined in Part 3 (including those available without law change). It then provides examples of how access charges have been used overseas and evidence that suggests they could be a useful tool for New Zealand.

4.1 Law change offers the biggest potential benefits

The Government assessed three options to address the issues in Part 3:

- **Option A: concessionaire-based access charges** – visitors are required to pay an access charge when using a concessionaire at relevant sites (possible now).
- **Option B: voluntary access charges** – visitors are encouraged to make a voluntary contribution at the trailhead or when booking (possible now).
- **Option C: compulsory access charges** – visitors are required to pay an access charge at relevant sites (law change required).

While concessionaire-based and voluntary access charges could boost conservation revenue, they don't solve equity issues or provide a clear, consistent framework across conservation legislation. Therefore, the Government is focusing on compulsory access charges but still sees potential short-term benefits in the other methods (for avoidance of doubt, references to access charges in the rest of this document refer to compulsory access charges).

4.2 Access charges are common globally

Table 2 shows how governments around the world use access charges to help fund the upkeep and improvement of natural visitor attractions.



Table 2: International examples of access charges to national parks

Location and description	Type of charge and rate (NZ\$) ²²
<p>Uluru-Kata Tjuta National Park located in Australia's Northern Territory is a UNESCO World Heritage Site renowned for its natural landmarks, including the iconic Uluru rock formation. The park attracts over 250,000 visitors annually.</p>	<p>Per person (18 years and over): \$41 for three-days or \$54 for an annual pass.</p> <p>Vehicle of a Northern Territory resident: \$119 for an annual pass (includes driver and all passengers in the car).</p>
<p>Freycinet National Park in Tasmania is renowned for its landscapes and the iconic Wineglass Bay. The park has more than 300,000 visitors annually.²³</p>	<p>Per person (5 years and over): \$25 per day for all parks in Tasmania, excluding Cradle Mountain.</p> <p>Per vehicle (up to 8 passengers): \$51 per day or \$101 for two-months.</p>
<p>Fuji-Hakone-Izu National Park is Japan's most visited national park, encompassing the famous volcanic peak of Mount Fuji. The park has around 5 million visitors per year, of these around 300,000 visitors make it to the summit of Mount Fuji.²⁴</p>	<p>Per person: \$23 per day to climb Mount Fuji.²⁵</p> <p>All international visitors to Japan must also pay an \$11 departure tax to fund national parks, airport infrastructure and regional tourism promotion.</p>
<p>Banff National Park located in the Canadian Rockies is Canada's oldest national park and a UNESCO World Heritage Site. It attracts over 4 million visitors annually.</p>	<p>Per person (18 to 64 years): \$13 per day or \$89 for an annual pass.²⁶</p> <p>Private car: \$26 (for the driver and up to six passengers).</p>
<p>Yellowstone National Park located in America is famous for its geothermal features. It was the world's first national park and attracts over 4.5 million visitors each year.</p>	<p>Per person (16 years and over): \$32 per day.</p> <p>Private car: \$56 (for the driver and all passengers) per day.</p> <p>Annual pass: \$113 (for the passholder and passengers in the same car, or the passholder and up to three other people).²⁷</p>
<p>Kruger National Park, one of Africa's largest game reserves located in South Africa, is renowned for its diverse wildlife. It receives nearly 1 million visitors annually.</p>	<p>Per person (12 years and over):</p> <p>South African citizens and residents: \$11 per day.</p> <p>Southern African Development Community residents: \$22 per day.</p> <p>International visitors: \$44 per day.</p>

22 The table used currency exchange rates as at 3 September 2024. The amounts are rounded to the nearest dollar.

23 The Tasmania Parks and Wildlife Service also offers unlimited admission to all its national parks in two-month, annual, or biennial passes. It also has discounts for its annual and two-year passes for visitors with an Australian government-issued Seniors Card, Pensioner Concession Card, Health Care or DVA card.

24 The charge covers the use of the popular Yoshida Trail that leads to the summit of Mount Fuji and was introduced in 2024. In 2012 more than 2.3 million people visited the 2,400-metre-high fifth stage.

25 See Mt Fuji Climbing. Retrieved October 8, 2024, from <https://www.fujisan-climb.jp/en/index.html>.

26 The Parks Canada Discovery Pass also offers unlimited admission for 12 months to over 80 national parks, national historic sites and national marine conservation areas.

27 The National Parks Service also offers an America the Beautiful Pass, which gives access to 2,000 federal sites in the United States of America.

4.3 The opportunities and challenges of access charging

The Government has used international research on overseas access charges to support its initial thinking on the potential opportunities and challenges of access charging. A high-level summary is given in Table 3, but in most cases the impact of an access charge depends on its design and implementation.

Table 3: Potential opportunities and challenges of access charges

Potential opportunities	Main considerations
<ul style="list-style-type: none"> Supporting a fairer user-pays system: access charges could create a fairer system, where more visitors contribute towards maintaining and improving the places they visit.²⁸ Growing conservation funding: access charging could increase the funding Department of Conservation (DOC) receives to invest in the visitor network and to protect biodiversity, leading to better conservation outcomes.^{29,30} Improving visitor experiences: access charges could reduce crowding and littering, poor quality facilities, wear and tear, and the negative effects associated with high numbers of visitors on nature and wildlife. It could also improve DOC's ability to monitor the number and the effects of visitors at-place.^{31, 32, 33, 34} Increasing simplicity and transparency: a clear framework to charge for access under the Conservation Act 1987, National Parks Act 1980 and Reserves Act 1977 could be easier for visitors and concessionaires to understand and potentially cheaper to administer. 	<ul style="list-style-type: none"> Ensuring New Zealanders are not priced out of public conservation land: introducing access fees has the potential to increase the financial barriers to people getting outdoors and connecting with nature.³⁵ DOC's trial of differential pricing for international visitors on the Great Walks found that use of a pricing mechanism improved access for New Zealanders.³⁶ Government's obligations under Te Tiriti o Waitangi / Treaty of Waitangi: these are discussed in detail in Part 8 of this document. Investment into the visitor network needs to be consistent with conservation outcomes: access charges might enable DOC to manage more visitors at a site, but that might not be appropriate due to the potential environmental impact visitors might have on that place. Cumulative effect on tourism: the combined effect of charges on international visitors should not be unreasonable. A 2023 study found that long-haul tourism demand is relatively resistant to price changes in the short run.³⁷ Price sensitivity varies country to country, a 2011 study found that visitors from Asia tend to be more price sensitive (i.e. elastic demand) compared to visitors from Australia, UK and Germany (i.e. inelastic demand).³⁸

28 Shultz, S., Pinazzo, J., & Cifuentes, M. (1998). Opportunities and limitations of contingent valuation surveys to determine national park entrance fees, evidence from Costa Rica. *Environment and Development Economics*, 3, 131–149. <https://doi.org/10.1017/S1355770X98000072>.

29 Buckley, R.C. (2003). Pay to Play in Parks: An Australian Policy Perspective on Visitor Fees in Public Protected Areas. *Journal of Sustainable Tourism*, 11(1), 56–73. <https://doi.org/10.1080/09669580308667193>.

30 Manning. (1999). as cited in Lal, P. et al. (2017). Valuing visitor services and access to protected areas: The case of Nyungwe National Park in Rwanda. *Tourism Management*, 61, 141–151. <https://doi.org/10.1016/j.tourman.2017.01.019>.

31 Cessford, G.R. (2000). Wilderness science in a time of change conference. *Volume 3: Wilderness as a place for scientific inquiry, Missoula, Montana, USA, 23-27 May 1999*. Proceedings-Rocky Mountain Research Station, USDA Forest Service, 231–238. https://www.fs.usda.gov/rm/pubs/rmrs_p015_3/rmrs_p015_3_231_238.pdf.

32 Manning. (1999).

33 Buckley, R.C. (2003).

34 Riley et al. (2006) as cited in Kaffashi, S., Yacob, M.R., Clark, M.S., Radam, A., & Mamat, M.F. (2015). Exploring visitors' willingness to pay to generate revenues for managing the National Elephant Conservation Center in Malaysia. *Forest Policy and Economics*, 56, 9–19. <https://doi.org/10.1016/j.forpol.2015.03.004>.

35 Miller, Z.D., Jorgenson, J., Nickerson, N.P., & Pitas, N.A. (2018). A cognitive hierarchy approach to understanding fee increases in the national parks of the United States. *Journal of Outdoor Recreation and Tourism*, 22, 18–25. <https://doi.org/10.1016/j.jort.2018.02.001>.

36 Department of Conservation. (2020). Great Walks Differential Pricing Trial – 2019/20 Season Evaluation (Mid-Season Report). <https://www.doc.govt.nz/globalassets/documents/about-doc/news/issues/great-walks-differential-pricing-trial-evaluation-report-2019-20.pdf>.

37 Vatsa, P. & Balli, F. (2024). How important are prices in long-haul travel? Evidence from New Zealand. *Tourism Economics*, 30(6), 1492–1507. <https://doi.org/10.1177/13548166231215382>.

38 Schiff, A. & Becken, S. (2011). Demand elasticity estimates for New Zealand tourism. *Tourism Management*, 32(3), 564–575. <https://doi.org/10.1016/j.tourman.2010.05.004>.

4.4 Access charging could be done in different ways

The Government is seeking feedback on the core design principles that could underpin the Government's use of access charges.

- **Who should be charged** (Part 5) – New Zealand visitors, international visitors, or both?
- **Where should access charges be used** (Part 6) – what 'types of places' on public conservation land would be suitable for access charging, and what should be excluded?
- **How should the money be used** (Part 7) – where should spending of revenue from an access charge be focussed?

The Government is not consulting on the rate for any potential access charge at this time or the specific locations, because it wants to better understand views and further evidence that may be provided on access charging first. The setting of a rate, and other more detailed design questions, would be consulted on at a later date if the Government decides to progress access charging.

4.5 Consultation questions

#	Questions
3.	<ol style="list-style-type: none">Do you support the Government introducing the ability to charge for access to some parts of public conservation land?Why or why not?Could you share any evidence or data that has informed your opinion?
4.	Are there any international examples available that you think the Government could learn from?
5.	Do you agree with the assessment of voluntary and concessionaire-based access charges?



Part 5

Who should pay an access charge?

One main question for any charge is who should have to pay. A mix of approaches are used internationally for access charges, especially regarding to domestic versus international visitors (see Table 2).

Who has to pay an access charge will affect how much funding is collected, how its implemented and its effect on wider objectives, like supporting access to the outdoors. For example, if more people are charged, more areas might be able to be maintained, and to a higher standard.

The approach to who should pay an access charge could be different at different places. For example, even if the Government decides to charge only international visitors at popular sites, places may exist in the network where charging all users would maintain access, for example isolated roads that otherwise might not be maintained.³⁹

5.1 Three potential approaches for who should be charged

Three potential approaches are outlined below with possible advantages and disadvantages given in Table 4 (potential discounts and exemptions are covered in Part 5.2):

- **Option A: Charge all visitors the same** – everyone would be charged an equal amount to access public conservation land.
- **Option B: Charge everyone but charge New Zealanders less than international visitors** – everyone would be charged to access public conservation land. New Zealand citizens and people ordinarily resident in New Zealand would pay a lower charge, consistent with DOC's policy for the Great Walks.⁴⁰
- **Option C: Charge only international visitors** – only people who do not live in New Zealand would pay an access charge.

Potential gross revenue from these options is estimated in Part 7.1 (Figure 2).



Giant Gate Falls, Milford Track.
Photo: Graham Dainty

Differential pricing on the Great Walks improved take up by New Zealanders

Between 2018 and 2019 DOC trialled the use of higher prices for international visitors on four of New Zealand's Great Walks (Milford, Routeburn, Kepler and Abel Tasman) during the peak season. The trial fees for international visitors to use huts and campsites were double the rate for New Zealand citizens and people ordinarily resident in New Zealand. Evaluation of the trial found that during the trial period using higher prices for international visitors resulted in:

- **more New Zealanders experiencing the Great Walks**, New Zealander bednights increased by 21% compared with the year before (likely due to less 'crowding out' by international visitors)
- revenue from international visitors increasing by \$0.66 million.⁴¹

Following the success of the trial, the Government increased hut fees for international visitors (to 1.5x the New Zealander rate) for all the Great Walks (excluding the Whanganui Journey and Waikaremoana).

39 For example, in places like No Man's Road (Ruahine Forest Park) where access routes are maintained for defined user groups. Infrastructure to support access such as roads and bridges is expensive for DOC to maintain, especially with ongoing damage from storms, and the benefit is mostly to the user groups. Enabling user groups to contribute towards the cost of the access routes they use could help us keep these access routes open.

40 To be ordinarily resident in New Zealand someone must have lived in New Zealand for at least 6 of the 12 months immediately before their booking; hold a residence class, student, or work visa; and have New Zealand as their primary place of established residence. More information can be found here: <https://www.doc.govt.nz/about-us/our-role/managing-conservation/recreation-management/great-walks-management/eligibility/>.

41 Department of Conservation. (2020).

Table 4: Potential advantages and disadvantages of access charges - who should be charged

Options	Potential advantages	Potential disadvantages
Option A: Charge everyone the same	<ul style="list-style-type: none"> • Most consistent with the idea that visitors should contribute towards the upkeep and improvement of the places they visit. • Having no differential pricing or exclusions based on nationality would be cost-effective, easier to implement and simpler overall. • Enables use of price as a volume management tool if desired. 	<ul style="list-style-type: none"> • The need for New Zealanders to pay to visit public conservation land may be a barrier to connecting with nature. • May negatively affect the ability of Iwi members to fulfil their roles as kaitiaki, to engage in cultural practices, to exercise tikanga and other responsibilities.
Option B: Charge everyone but charge New Zealanders less than international visitors	<ul style="list-style-type: none"> • Consistent with the idea that visitors should contribute towards the upkeep and improvement of the places they visit. • Recognises somewhat that New Zealanders contribute via their taxes. • Allows use of price as a volume management tool if desired. • Would offer better data on visitors. • May improve access for New Zealanders due to less overcrowding. 	<ul style="list-style-type: none"> • Differential pricing would make the system more complicated and may increase administrative costs. • The need to pay to visit public conservation land may be somewhat of a barrier to New Zealanders connecting with nature. • May negatively affect the ability of Iwi members to fulfil their roles as kaitiaki, to engage in cultural practices, to exercise tikanga and other responsibilities.
Option C: Charge only international visitors	<ul style="list-style-type: none"> • International visitors make a fair contribution. • Recognises that New Zealanders contribute via their taxes. • Allows use of pricing as volume management tool for international visitors if desired. • Does not limit New Zealanders' ability to connect with nature on public conservation land. • Does not affect the ability of Iwi members to fulfil their roles as kaitiaki, to engage in cultural practices, to exercise tikanga and other responsibilities. 	<ul style="list-style-type: none"> • Exclusions may significantly increase administrative costs.⁴² • Does not provide for all visitors to pay, despite the impact being the same irrespective of nationality. • Would provide incomplete data on visitor numbers.

5.2 Discounts and exemptions

Under all options, the Government could exempt some visitors from charges or offer reduced fees, like for children. Existing discounts DOC offers include no fees for infants (aged up to 4 years), a 50% discount for children/youth (aged 5–17 years) and a 25% discount for adult Community Services Card holders.⁴³ DOC also provides discounts as an incentive for groups that help DOC with conservation and recreation work. Exemptions could also be given for people working or volunteering within the area where access charges are used.

⁴² Based on feedback on the cost of entry fee exemptions from Parks Australia, given during an online context-sharing session.

⁴³ More information on DOC's existing discount policy can be found here: <https://www.doc.govt.nz/about-us/our-policies-and-plans/discount-policy-for-recreational-facilities/>.

5.3 Consultation questions

#	Questions
6.	To what extent do you support: <ul style="list-style-type: none">a. Option A: Charging everyoneb. Option B: Charging everyone but charging New Zealanders less than international visitorsc. Option C: Charging only international visitors
7.	<ul style="list-style-type: none">a. Is there anything else the Government should consider when thinking about who should pay an access charge?b. Are there any other groups the Government should consider charging for access to some public conservation land?

Part 6

Where should access charging be used?

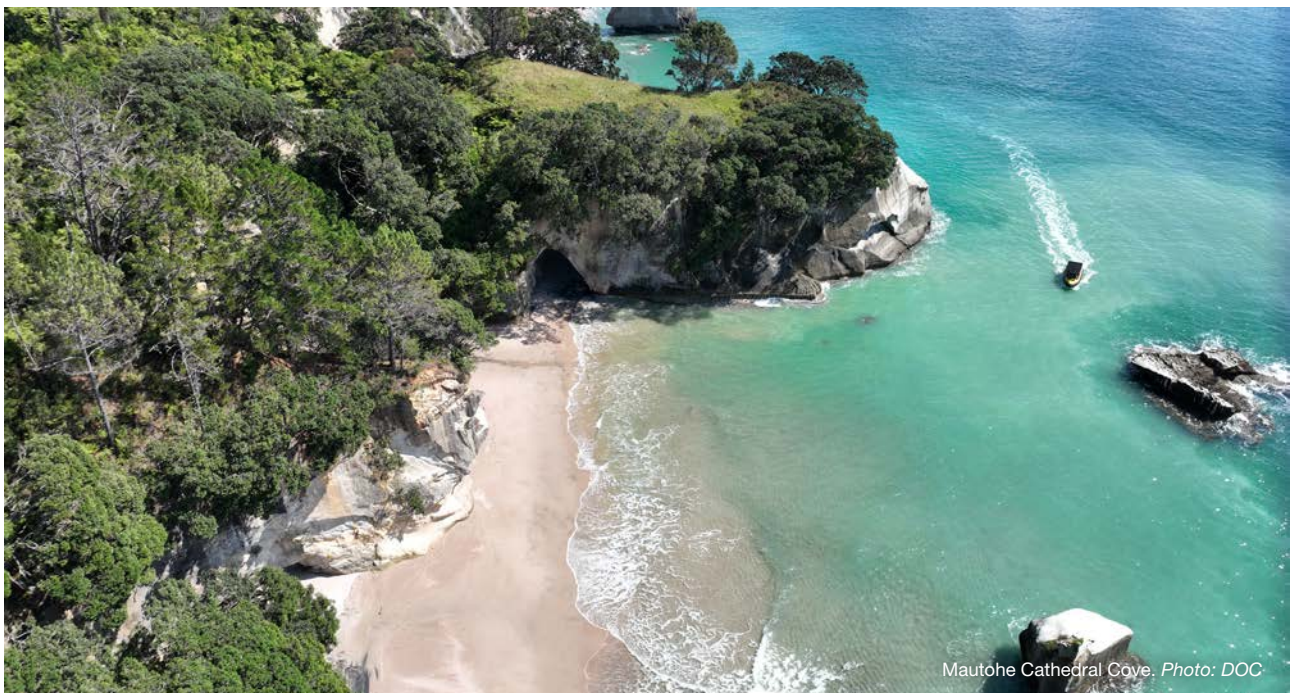
Another important decision is where access charges should be applied. **The Government does not consider access charging would be a practical or desirable tool for most public conservation land.**

6.1 Potential features of a site or location where access charges could be suitable

Research suggests that access changes are most effective when they are strategically used and are supported by the local community. If access charges are introduced, the Government would like to understand where they would be best used. Listed below are characteristics that the Government expects could be relevant to selecting sites suitable for access charges (a site could have one or more of them).

- a. **Places facing unsustainable pressure from visitors** – more visitors mean higher maintenance and servicing costs for things like toilets, tracks, roads, bridges and car parks; and greater potential impacts on nature.
- b. **Places popular with international visitors** – many international visitors do not contribute to the costs of maintaining and improving the places they visit.
- c. **Places with high biodiversity and scenic values** – people could be more willing to pay in these places (e.g. national parks) and they often require greater levels of investment (e.g. toilets, rubbish collection, trapping rodents) to sustain these values.
- d. **Places where user groups are defined** – some places have defined user groups (e.g. Te Araroa walkers). Because these groups benefit more, it could be equitable to ask them for a higher contribution.⁴⁴

The Government expects that engagement with Iwi (and Hapū) and local communities would be an important part of any process to set an access charge. Engagement would help us ensure access charges can be implemented successfully and provide benefits to the local community, while minimising any downsides.



⁴⁴ A Trail Pass was introduced in 2024 for the Te Araroa Trail. The \$195 pass is retailed by the Te Araroa Trust. It entitles holders to stay in most DOC huts and campsites along the trail, but is not required to walk on the trail itself.

6.1.1 Examples of places that might have these characteristics

Table 5 sets out several places that could satisfy the characteristics outlined above. These places are all popular with international visitors. For example, nearly 80% of visitors to Milford Sound Piopiotahi and the Tongariro Alpine Crossing are international visitors.

Table 5: Potential sites that might be suitable for access charges

Potential sites	Annual estimated visitors
Mautohe Cathedral Cove	208,000 ⁴⁵
Tongariro Alpine Crossing	118,000
Kā Roimata o Hine Hukatere Franz Josef Glacier	510,000
Piopiotahi Milford Sound (including boat passengers)	750,000
Aoraki Mount Cook	1,040,000
Total	2,626,000

6.2 Parks pass

Another approach to access charging could be to implement a ‘park pass’. For example, in the USA the NZ\$130 *America the Beautiful Pass* provides access (including basic amenities) to over 2,000 federal recreation sites, including national parks, forests, and wildlife refuges.⁴⁶ Such an approach could have many advantages including providing a stable revenue stream, improving administrative efficiency and streamlining visitor experience.

6.3 Consultation questions

#	Questions
8.	<p>a. Do you agree that the use of access charges should be limited to some areas of public conservation land?</p> <p>b. If you strongly agree or agree, where should these places be?</p>
9.	<p>a. We have identified the types of locations where access charges could be effective, which may include one or more of the following:</p> <ul style="list-style-type: none">• Places facing unsustainable pressure from visitors• Places popular with international visitors• Places with high biodiversity and scenic values• Places where user groups are defined <p>Do you agree with the features identified for where access charging could be used?</p> <p>b. Are there any additional features we should consider?</p>
10.	Are there any features of a place that would mean access charging should not be introduced there?
11.	To what extent do you support the ‘parks pass’ approach?

⁴⁵ Note that the access track to Mautohe Cathedral Cove was closed in 2023 due to storm damage. This estimate was based on 2022 visitor numbers. The track is expected to reopen by 2025.

⁴⁶ United States National Parks Service. Entrance Passes. Retrieved October 8, 2024, from <https://www.nps.gov/planyourvisit/passes.htm>.



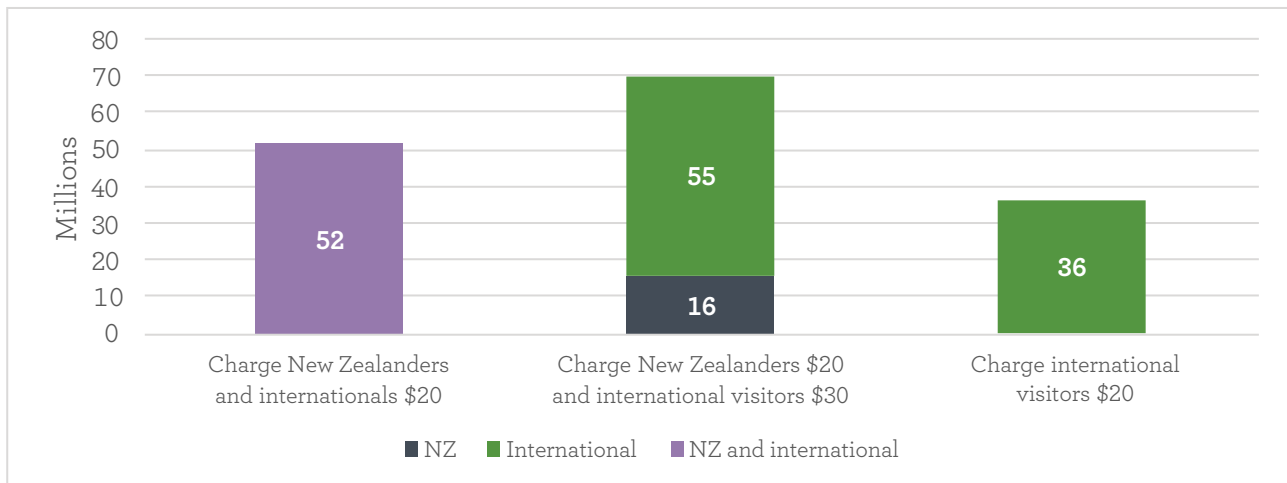
Part 7

How should the additional revenue be used?

7.1 Access charging could raise up to \$70 million a year for conservation

The Government estimates that if it introduced access charging at five popular sites across New Zealand it could generate additional funding per year for conservation from between \$36 million to \$70 million. Costs would also be involved in implementing access charging. Figure 2 shows estimated revenue potential using a placeholder base rate of \$20 per person.

Figure 2: Potential gross annual revenue from access charging options



Assumptions

Total visitors: 2.6 million annually

- Placeholder \$20 base rate. Differential rate for the second scenario of \$30 (1.5x).
- Based on sites identified as having some of the features in Part 6.
- Each year, 2.6 million visitors would be charged to access the 5 sites. This includes all types of visitors (New Zealanders, international visitors, locals). Note that visitor numbers at these sites peaked at a combined 3.3 million before the COVID-19 pandemic.
- Assumes 70% of visitors to these sites are international (not ordinarily resident in New Zealand).
- The projected annual revenue is gross (not net) revenue. DOC estimates that the second two options will have higher costs due to the increased complexity and therefore lower net revenue.
- The number of visitors required to pay, and projected annual revenue does not consider any change in demand as a result of price (elasticity). This may occur for example, if visitors choose not to visit these sites due to the requirement to pay.

7.2 Three approaches for where the revenue from access charges could be spent

The Government has identified three broad approaches below that draw on how other countries invest access-charging revenue.

All approaches allow flexibility for the Government to apply revenue to its highest value use and it is possible to have a combination of approaches to ensure investments have the greatest impact across the country.

- **Option A: More of the money should be invested at the place it is collected in** (i.e. within the park or local area) – focus on spending revenue collected within the national park, conservation area or reserve it was collected in.
- **Option B: More of the money should be invested within the region it is collected in** – this would be based on DOC’s regional structure, for example Northern North Island, Hauraki-Waikato-Taranaki, Western South Island.⁴⁷
- **Option C: Invest the money in priority projects across New Zealand, regardless of where it is collected** – all money collected would be spent on priority projects and not be geographically tied to a specific area in New Zealand. This is the current situation for existing facility charges (e.g. hut fees).

The Government is committed to ensuring that revenue collected through access charges improves the visitor network and biodiversity outcomes. Reporting on how much revenue is collected from access charges, and how it is being spent, is critical for transparency and accountability.

The Government received feedback on the recent IVL amount increase consultation that people thought that transparency around resulting revenue was going to be used was important to them, and that it should be spent on improving visitor experiences. This is aligned with recent research conducted by Kantar found that New Zealanders and international visitors had ‘a strong expectation’ that any money raised by an access charge to visit Milford Sound Piopiotahi is invested into conservation at-place, and that the ‘investment is clear and visible’.

Choices around revenue spending might also influence decisions on the charge amount. For example, the smaller the area that revenue is applied to, the smaller the potential rate might be.

Table 6 sets out the potential advantages and disadvantages of the three options for where the money could be spent.

⁴⁷ For a full list of DOC operational regions see: <https://www.doc.govt.nz/about-us/our-structure/business-groups/>.

Table 6: Potential advantages and disadvantages - where revenue could be spent

Options	Potential advantages	Potential disadvantages
<p>Option A: More money is invested at-place</p>	<ul style="list-style-type: none"> • Visitors would be contributing directly towards the upkeep and improvement of the places they visit. • Could support the social licence of the charge, because visitors would know where the revenue is being invested. • May enable visitor experiences to be enhanced where the charge is used. • Simplest approach to understand and transparent. 	<ul style="list-style-type: none"> • Places where the Department of Conservation cannot charge would be excluded from any benefits. • Administratively difficult to implement. • May lead to the allocation of funding to lower priority projects. • Does not support the widest possible network being made available for New Zealanders, where popular sites would subsidise less popular sites.
<p>Option B: More money is invested within the region it is collected in</p>	<ul style="list-style-type: none"> • Visitors would be contributing directly towards the upkeep and improvement of the regions they visit. • Could support the social licence of the charge, as visitors would know the region where the revenue is being invested. • May enable visitor experiences to be enhanced where the charge is used, while maintaining the ability to prioritise visitor investment on a regional level. • Simple approach to understand and more transparent. • May be easier to implement. • Somewhat supports a wider network of experiences being provided to New Zealanders, with popular sites subsidising less popular sites. 	<ul style="list-style-type: none"> • Regions where there are fewer opportunities to charge for access would see less benefits.
<p>Option C: Money does not have to be invested in a particular area</p>	<ul style="list-style-type: none"> • Enables visitor experiences to be enhanced where the charge is used, while maintaining the ability to prioritise visitor investment on a national level. • Would be easiest to implement. • Best supports a wider network of experiences being provided to New Zealanders, with popular sites subsidising less popular sites. 	<ul style="list-style-type: none"> • Revenue may not directly benefit where it was collected, detracting from the social license of a charge. • More difficult approach to understand and potentially less transparent.

7.3 Different countries have different ways of spending access charges

Table 7 below lists approaches taken overseas to the allocation of money generated by access charges in protected natural areas. These examples show it is often a balance between the different approaches outlined above.

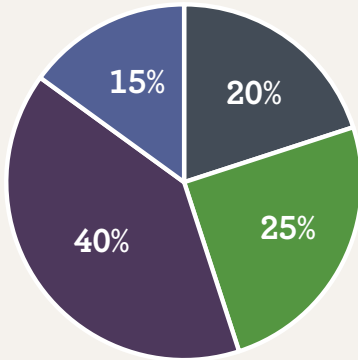
Table 7: International comparison of access charge revenue allocation

Country	Description	A Place-specific	B Region	C National
Australia	The money collected through entrance passes for parks in Australia's six states (New South Wales, Queensland, South Australia, Tasmania, Victoria and Western Australia) is typically reinvested back into the region. Uluru-Kata Tjuta, Booderee and Kakadu national parks are managed at a federal level by Parks Australia. Money collected in these three parks is spent directly at-place.	✓	✓	
Canada (Parks Canada)	The money collected through entrance passes is used across Canadian national parks to ensure all parks can operate effectively. Visitor fees contribute nearly 25% to Parks Canada's operations, with the rest coming from the taxpayer.			✓
United States of America (National Parks Service)	At least 80% of the funding from access fees is invested where it was collected, the rest is used to support parks that do not collect fees or only generate a small amount of revenue.	✓ 80%		✓ 20%

Case study: Uluru-Kata Tjuta National Park, Australia

All revenue collected through access passes is invested back into the Uluru-Kata Tjuta National Park

The access fee helps preserve Uluru-Kata Tjuta's World Heritage-listed natural and cultural sites and provides better services and facilities for visitors. The money is split in four ways.⁴⁸



25% Traditional owner lease payments

This money goes directly to Anangu, supporting homelands, investments, training and business development.

40% Operations

Visitor site preparation, incident response, delivery of fire, feral animal and weed management training and mentoring opportunities for local Anangu on country.

15% Ranger and cultural activities

Visitor centres, education, events, permits and park pass compliance.

20% Natural and cultural preservation

Rock art preservation, on country workshops, collection of oral histories, joint management, biodiversity management (threatened species, flora and fauna surveys).

7.4 Consultation questions

#	Questions
12.	To what extent do you support: a. Option A: More of the money should be invested at the place it is collected in b. Option B: More of the money should be invested within the region it is collected in c. Option C: Invest the money in priority projects across New Zealand, regardless of where it is collected d. If you have not already, please explain why this is your preferred approach or combination of approaches.
13.	Are there any international approaches to spending money from access charging that you think the Government should consider?

⁴⁸ Parks Australia. Uluru-Kata Tjuta park passes. Retrieved October 8, 2024, from <https://parksaustralia.gov.au/uluru/plan/passes/>.

Part 8

Working with Iwi (and Hapū)

8.1 Iwi have responsibilities, rights and interests in conservation land

Iwi have deep and enduring connections with public conservation land. For example, some Iwi members consider features of the land to be tūpuna (ancestors). Having access to public conservation land, waters and other taonga is important to Iwi members. Some Iwi (and Hapū) also have legal rights in conservation land, including through Treaty settlement legislation. For example, the Ngāi Tahu Claims Settlement Act 1998 granted the Iwi 'nohoanga entitlements'. These are specific areas of Crown-owned land adjacent to lakeshores or riverbanks (often public conservation land) that can be used on a temporary, but exclusive basis to facilitate the gathering of food and other natural resources by Ngāi Tahu Whānui.

8.2 The Government has a duty to protect these rights and interests

Under the Conservation Act, the Government's policies, planning and decision-making processes need to give effect to Treaty principles.⁴⁹ The following principles are likely to be the most relevant to charging for access:

- **Partnership:** both parties to the Treaty must act towards each other reasonably and in good faith. This principle emphasises that both parties must work together in a cooperative and respectful manner.
- **Participation:** both parties to the Treaty need to understand each other's interests and views. The Government needs to ensure it is fully informed before making decisions that affect Māori. Māori also need complete information to enable them to meaningfully engage with the Government.
- **Active protection:** the Government must actively protect Māori rights and interests. This includes safeguarding their tino rangatiratanga (authority) and taonga and commitments made through Treaty settlements. Active protection means making informed and reasonable decisions based on the situation.
- **Redress:** the Government must remedy past Treaty breaches and must not foreclose in advance available means of redress without the agreement of its Treaty partner.

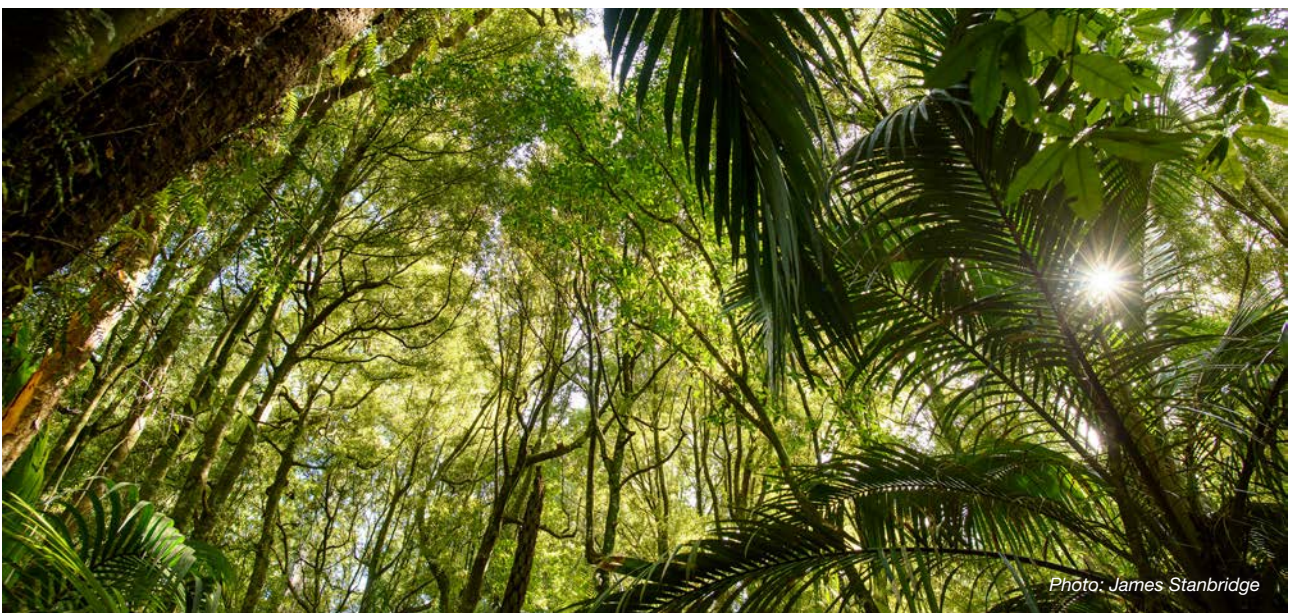


Photo: James Stanbridge

⁴⁹ Section 4, Conservation Act 1987.

8.3 How the Government intends to give effect to the Treaty principles

The Government wants to understand the effect that access charges could have on Iwi responsibilities, rights and interests. The views of Iwi are likely to differ across the country. Engaging with Iwi will be an important part of further investigating the introduction of access charges.

As part of this consultation process, DOC will meet with Iwi to understand:

- their views on access charging
- what effects these potential charges could have
- whether there are ways to address any concerns.

8.4 Consultation questions

#	Question
14.	How can the Government best meet its Treaty obligations in designing and implementing access charging?

Part 9

Other design questions

9.1 Application to land with conservation values administered by others

Groups like councils, not-for-profit organisations and Iwi also administer land with conservation values. For example:

- most councils and many Iwi administer reserves under the Reserves Act
- since 2009 Matiu Somes Island has been owned by Port Nicholson Block Settlement Trust (Taranaki Whānui ki Te Upoko o Te Ika) but is managed by DOC.

In maintaining and investing in these places, these groups incur costs. Where this land satisfies the considerations outlined in Part 6, the ability to charge for access could be extended to those other groups. This would acknowledge that they can face the same costs that DOC does.

9.2 Interactions with concession fees

If access charges are progressed, further work will be needed on how charges are collected when visitors use concessionaires and whether the existing system of visitor impact fees could be streamlined with the new charges.

9.3 Consultation questions

#	Question
15.	Some groups other than the Department of Conservation (DOC) manage land with conservation values. Do you think these groups should be allowed to charge people to access this land, if it meets certain characteristics in section 7, to help pay for upkeep and improvements?

Part 10

Summary of consultation questions

#	Questions
Part 3 – Issues	
1.	Do you agree with the issues and how they have been presented?
2.	<ol style="list-style-type: none"> Have any issues been missed? Do you have any examples or data that demonstrate your view on the issues?
Part 4 – Access charging – part of the solution?	
3.	<ol style="list-style-type: none"> Do you support the Government introducing the ability to charge for access to some parts of public conservation land? Why or why not? Could you share any evidence or data that has informed your opinion?
4.	Are there any international examples available that you think the Government could learn from?
5.	Do you agree with the assessment of voluntary and concessionaire-based access charges?
Part 5 – Who should pay an access charge?	
6.	<p>To what extent do you support:</p> <ol style="list-style-type: none"> Option A: Charging everyone Option B: Charging everyone but charging New Zealanders less than international visitors Option C: Charging only international visitors
7.	<ol style="list-style-type: none"> Is there anything else the Government should consider when thinking about who should pay an access charge? Are there any other groups the Government should consider charging for access to some public conservation land?
Part 6 – Where should access charging be used?	
8.	<ol style="list-style-type: none"> Do you agree that the use of access charges should be limited to some areas of public conservation land? If you strongly agree or agree, where should these places be?
9.	<ol style="list-style-type: none"> <p>We have identified the types of locations where access charges could be effective, which may include one or more of the following:</p> <ul style="list-style-type: none"> Places facing unsustainable pressure from visitors Places popular with international visitors Places with high biodiversity and scenic values Places where user groups are defined <p>Do you agree with the features identified for where access charging could be used?</p> Are there any additional features we should consider?
10.	Are there any features of a place that would mean access charging should not be introduced there?
11.	To what extent do you support the 'parks pass' approach?

Part 7 – How should the additional revenue be used?

12. To what extent do you support:
- a. Option A: More of the money should be invested at the place it is collected in
 - b. Option B: More of the money should be invested within the region it is collected in
 - c. Option C: Invest the money in priority projects across New Zealand, regardless of where it is collected
 - d. If you have not already, please explain why this is your preferred approach or combination of approaches.
13. Are there any international approaches to spending money from access charging that you think the Government should consider?

Part 8 – Working with Iwi (and Hapū)

14. How can the Government best meet its Treaty obligations in designing and implementing access charging?

Part 9 – Other design questions

14. Some groups other than the Department of Conservation (DOC) manage land with conservation values. Do you think these groups should be allowed to charge people to access this land, if it meets certain characteristics in section 7, to help pay for upkeep and improvements?

Part 11

Glossary

TERM	EXPLANATION
Biodiversity	Biodiversity is the variety of all living things, including plants, animals and microorganisms, in a particular area or on the entire planet. In the context of this document, it refers only to native animals, insects and plants.
Concession	A type of permission given by the Department of Conservation to a business or organisation to carry out an activity on public conservation land. It can be a lease, licence, permit or easement.
Concessionaire	A business or organisation that holds a concession.
Conservation	The preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations.
Conservation system	The system that supports conservation in New Zealand, including the Department of Conservation, community groups, not-for-profit organisations and volunteers.
Differential pricing	Using different prices for groups with defined characteristics (e.g. international versus domestic).
Great Walk	The Great Walks are the Department of Conservation's premier tracks.
Public conservation land	Public conservation land is land in New Zealand that is protected and managed by the Government to preserve its natural, cultural and historic values.
Protected natural area	An internationally used term to refer to areas protected for their natural, cultural or historic value. Includes places like national parks.
Revenue	Money earned from people paying a charge (e.g. an admission fee).
Social licence	Gaining trust and approval from the public and community to do something.
Taonga	Treasure, anything prized. This is applied to anything considered to be of value including socially or culturally valuable objects, resources, phenomena, ideas and techniques.
Tino rangatiratanga	Authority.
Tūpuna	Ancestors.
User pays	The person who uses a service or product is the one who pays for it.

Appendix: Department of Conservation's preliminary impact analysis

This appendix presents the preliminary technical impact analysis undertaken by the Department of Conservation (DOC).

Constraints and limitations

The Minister of Conservation directed DOC to identify revenue generation opportunities. As part of this exercise, access charging was highlighted as a key opportunity. Proposals within this discussion document have been limited to broad options for the use of charging for access to some public conservation land (PCL). Because of this, the options considered have been limited to that subject. Changes to concessions and land management processes are being considered as part of the 'Modernising Conservation Land Management' discussion document.

To align timeframes with wider legislative changes, there has not been enough time to prepare a separate interim regulatory impact statement and full cost benefit analysis. This appendix is necessary for this document to serve as an interim regulatory impact statement to satisfy the Cabinet Office impact analysis requirements (see Cabinet Office Circular Impact Analysis Requirements (30 June 2020) CO (20) 2). DOC seeks to gain more evidence through the public consultation process to inform the preparation of a full regulatory impact statement and cost benefit analysis, should the Government decide, following consultation, to progress the proposal.

While this document does not seek feedback on potential access charge rates, an arbitrary \$20 rate has been used for the analysis. Revenue estimates assume that price has no effect on demand and do not take into account implementation costs. Cost estimates are based on the best available data, but that data is incomplete and sometimes inconsistent. Work continues internally at DOC to improve this data.

Context on the status quo

This section is intended to complement Part 2 – Context and Part 3 – Issues in the body of this discussion document.

Many people place a high value on the status quo of free public access for private visitors (not using a concessionaire) to most PCL. Free public access reduces financial barriers to visitors, encouraging greater participation in outdoor recreation, consistent with DOC's obligation to foster recreation. However, such access limits the ability for visitors to contribute towards the upkeep and improvement of the places they visit. While DOC does not currently charge for access to most public conservation land, it charges for various other activities and facilities.

No clear legislative framework exists to charge for access to PCL, the power to charge varies across the three principal Acts.

- a. **Conservation Act 1987:** the entry to and use of conservation areas by the public must be free of charge (section 17(1)). The exceptions to this are hunting permits and concessions (section 38 and Part 3B). The Minister of Conservation may impose a reasonable charge for the use of facilities (other than paths and tracks). Departmental fees on concessionaires such as community contributions fees are used in places with high visitation to offset the cost of visitor management interventions (e.g. Tongariro Alpine Crossing, Routeburn Track) (section 17X).
- b. **National Parks Act 1980:** the Minister of Conservation may impose a reasonable charge for the use of any facilities (other than a path or track)(section 49(3)). The Minister may from time to time make bylaws prescribing the conditions on which people shall have access to or be excluded from any park or any part of any park, and fixing charges for the admission of people to any part of any park set apart for any specified public recreation purpose (section 56). Concessions under the Conservation Act can also apply to national parks.

- c. **Reserves Act 1977:** the administering body of a reserve (or the Minister of Conservation) has varying explicit powers in relation to access fees depending on the reserve status. Administrators of historic reserves can charge admission fees (section 58(c)). Administrators of recreation reserves can charge a reasonable fee for the use of a facility such as a footpath. Concessions under the Conservation Act can also apply to reserves.

This has led to various approaches being used across the country, with no framework across regions or classifications of PCL, often with inequitable outcomes.

Problem definition

The Government is facing rising costs related to maintaining and improving public conservation land. These costs include sustaining DOC's ageing visitor network and preventing biodiversity decline. Investment is needed to sustain the visitor network so that it is safe, accessible and delivers quality experiences. 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. Law change is needed so that more visitors who benefit from using public conservation land can help pay for its upkeep and improvement. This could help the Government to maintain a high-quality visitor network that deepens visitors' connection to nature.

Objectives

The objectives below have been used to assess the access charging design options in this document. They have derived from the Treasury's Guidelines for Setting Charges in the Public Sector and the Australian Government Charging Framework.

Objectives	Description
Equity	Where identifiable people or groups benefit from public conservation land, they should make a fair contribution towards its upkeep and improvement. This ensures equity between users of public conservation land, and between the taxpayer and users. Equity is also achieved by ensuring that vulnerable people are not disadvantaged through the imposition of a charge.
Enhanced visitor experiences	Access charges should improve and enrich visitor experiences on public conservation land. This includes funding appropriate facilities, educational programmes and conservation efforts to ensure visitors have a high-quality experience and gain a deeper appreciation for the natural and cultural heritage on public conservation land.
Accessibility	Access charges should be considered alongside the Government's wider objective to support New Zealanders to connect with nature and should be used to promote access for New Zealanders where possible. This includes supporting Iwi (and Hapū) to fulfil their ancestral responsibilities in relation to public conservation land.
Simplicity and transparency	Access charges should be straightforward, practical, easy to understand and collect.

Multifactor analysis based on the objectives

Key for multifactor analysis tables on following pages			
++	Much better than the status quo	--	Much worse than the status quo
+	Better than the status quo	-	Worse than the status quo
0	About the same as the status quo		

Access charging – part of the solution? (Part 4)

Objective	Status quo: No clear framework for access charges on public conservation land	Option A: Increased use of concession fees for visitor impact	Option B: Voluntary use of access charges	Option C: Compulsory access charges
Equity	0	- A higher proportion of upkeep and improvement costs would be met by visitors using concessionaires, while others who receive the same benefit are not required to make a contribution.	0 Same as the status quo, contributions would be voluntary. Many visitors would not contribute towards the upkeep and improvement of the places they visit.	+ Subject to other design decisions, visitors would be required to contribute towards the upkeep and improvement of the places they visit.
Enhanced visitor experiences	0	+ Would make more funding available for visitor management (such as Manaaki Rangers at the Tongariro Alpine Crossing). Would only be effective in areas where concessionaires are highly utilised. Would provide fragmented data on visitor numbers.	0 May make more funding available for visitor management, but significantly less than Option A or Option C.	++ Would make more funding available for visitor management. Can use price as volume management tool if desired. Provides data on visitor numbers to support sustainable management.
Accessibility	0	0 Some additional costs on New Zealanders using a concessionaire to access public conservation land - this is unlikely to be a barrier to access given that the access charge is likely to be a small part of the price a visitor pays the concessionaire. Unlikely to negatively affect access for Iwi members to fulfil ancestral responsibilities.	0 Similar to the status quo, may make more money available to support access infrastructure.	- The need for New Zealanders to pay to visit public conservation land may be a barrier to connecting with nature. Would be a barrier for cultural users of public conservation land. May make more money available to support access infrastructure.
Simplicity and transparency	0	0 Charging through the existing concessions framework would make ensuring consistency difficult but would enable existing systems to be used.	+ Simple to implement and easy to understand.	+ Would enable a consistent national approach to be taken that is simple and transparent.

Who should pay an access charge? (Part 5)

	Status quo: No one pays access charges on public conservation land	Option A: Charge everyone the same	Option B: Charge New Zealanders less than international visitors	Option C: Charge only international visitors
Equity	0	<p>+</p> <p>Most consistent with the idea that visitors should contribute towards the upkeep and improvement of the places they visit.</p>	<p>++</p> <p>Consistent with the idea that visitors should contribute towards the upkeep and improvement of the places they visit. Recognises somewhat that New Zealanders contribute via their taxes.</p>	<p>+</p> <p>International visitors make a fair contribution. New Zealanders would not be contributing directly to some sites, such as short walks. Recognises that New Zealanders contribute via their taxes.</p>
Enhanced visitor experiences	0	<p>++</p> <p>More funding to manage visitor impacts. Enables use of price as a volume management tool if desired. Would offer better data on visitor numbers.</p>	<p>++</p> <p>Provides some funding to manage visitor impacts. Enables use of price as a volume management tool if desired. Would offer better data on visitor numbers.</p>	<p>+</p> <p>Provides some funding to manage visitor impacts. Can use price as a volume management tool for international visitors if desired. Would provide incomplete data on visitor numbers.</p>
Accessibility	0	<p>--</p> <p>The need for New Zealanders to pay to visit public conservation land may be a barrier to connecting with nature. May negatively impact access for Iwi members to fulfil ancestral responsibilities. Potentially provides funding to maintain access.</p>	<p>-</p> <p>The need to pay to visit public conservation land may be somewhat of a barrier to New Zealanders connecting with nature. May somewhat negatively impact access for Iwi members to fulfil ancestral responsibilities. May improve access for New Zealanders due to less overcrowding. Potentially provides funding to maintain access.</p>	<p>+</p> <p>Does not limit New Zealanders' ability to connect with nature on public conservation land. Would not negatively impact access for Iwi members to fulfil ancestral responsibilities. Potentially provides funding to maintain access.</p>
Simplicity and transparency	0	<p>++</p> <p>Having no differential pricing or exclusions based on nationality would be cost effective, easier to implement and simpler overall.</p>	<p>-</p> <p>Differential pricing would make the system more complicated and may increase administrative costs.</p>	<p>-</p> <p>Exclusions would make the system more complicated and may increase administrative costs.</p>

How should the additional revenue be used? (Part 7)

	Status quo: No access charges are in place	Option A: A greater share of the revenue is invested within the park or local area	Option B: A greater share of the revenue is invested within the region it is collected in	Option C: Revenue does not have to be invested in a particular area
Equity	0 Visitors would be contributing directly towards the upkeep and improvement of the places they visit. This would support the social licence of a charge.	+	+	- Money contributed may not directly benefit where it was collected. The social licence of this charge may be diminished if visitors cannot see where the revenue is being invested.
Enhanced visitor experiences	0 Would benefit the place where the charge is used – but places where DOC cannot charge may be excluded from any benefits. May lead to the allocation of funding to lower priority projects.	+	+	++ May enable visitor experiences to be enhanced where the charge is used, while maintaining the ability to prioritise visitor investment on a national level.
Accessibility	0 May result in an improved visitor network and conservation outcomes, facilitating a greater connection with nature. Least supports a wider network of experiences being provided to New Zealanders, with popular sites subsidising less popular sites.	+	+	++ May result in an improved visitor network and conservation outcomes, facilitating a greater connection with nature. Best supports a wider network of experiences being provided to New Zealanders, with popular sites subsidising less popular sites.
Simplicity and transparency	0 Simplest approach to understand but may be administratively difficult to implement. Would be more transparent how the funds are being used.	++	++	+ More difficult approach to understand but would be easiest to implement because it aligns with DOC's operational and budget frameworks. Potentially less transparent how funding is used.

