

Submission on: Department of Conservation (DOC) Discussion Document
Exploring charging for access to some public conservation land

Submitted by:

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Introduction

The Nelson Tasman Climate Forum (NTCF) is a community led initiative that aims to weave the Nelson Tasman communities together around urgent, strategic action on climate change. The Nature and Climate Group has a particular focus on the impacts of climate change on biodiversity and ecosystems.

Executive Summary

The government needs to **increase the baseline funding** for DOC to a level that allows for the sustainable management of the conservation estate, both now and into an ever-warming future. Any new revenue collected by a charging system must **NOT** be used to top-up baseline funding for business-as-usual activities. Instead, new revenue must be set-aside for new initiatives that enhance conservation and the visitor experience. The most effective and efficient way to raise new additional revenue is through a Parks-pass system for international adult visitors. We do not support any charges for New Zealand citizens and residents to visit any areas of the conservation estate.

Q1 and 2: Issues

Funding Adequacy

The underlying issue is that the Department of Conservation (DOC) is underfunded by government, with recent cuts to its budget exacerbating a fundamental revenue shortfall. The Department requires a **sustainable and sufficient budget in the long term**, in order to undertake the conservation work essential to ensuring the unique biodiversity and ecosystems of Aotearoa thrive in the face of a changing climate. This is the priority of the Department, after all, it's in the name.

Maintaining visitor services is also key to DOC's mandate, which involves maintaining safe, accessible and fit-for-purpose facilities and assets. As the discussion document notes, historic and ongoing underinvestment in these facilities and assets is problematic. Again, it is imperative that the government ensures baseline funding is sufficient to maintain these now, and into the future.

Climate Change

The discussion document notes that the costs of repairs after severe weather events is increasing, and it will continue to increase as the frequency and severity of these events increase with climate change. This is a significant issue that will require increasing funding to ensure DOC assets are maintained to the required standards.

However, the document did not acknowledge other impacts of climate change across our public conservation land (PCL). Severe weather events will affect assets, but may also imperil some threatened species, depending on their location and habitat requirements.

Changes in rainfall patterns and increasing drought and dry periods will also add pressure to native biodiversity and ecosystems, including wetland, freshwater and riparian ecosystems. For species already at risk, a prolonged drought may become the final nail in the coffin of extinction.

Increasing global temperatures are already increasing threats to native biodiversity, particularly the threats posed by invasive species (weeds and animal pests). Many invasive species are increasing both current populations and their range, exacerbating the threats they pose to indigenous species and ecosystems. This is particularly problematic for threatened alpine species that cannot retreat to higher areas (as these areas don't exist) to avoid predators that are increasing their altitudinal range with warming conditions.

As yet, it is unknown what impacts increasing global temperatures are having on the reproductive fitness of native species, but in elsewhere in the world, increasing temperatures in spring have led to mismatches in timing between pollinators and flowering. This leads to decreased reproductive output in plants (viable seeds/fruit) and decreased food resources for pollinators. Any climate change-related impacts on the production of viable seeds by native plants in Aotearoa is likely to result in less natural recruitment and replacement of key species within ecosystems, impacting trophic cascades as well as long term ecosystem viability.

Coastal ecosystems are particularly vulnerable to climate change with sea level rise and increasing storms and storm surges. Many of our coastal and shore birds are already under significant threat and may not be able to survive the significant changes in our coastal ecosystems as the climate changes. Other species specialised to these ecosystems (both flora and fauna) may also struggle to thrive.

All of these impacts from a rapidly changing climate will impact on DOC's ability to manage biodiversity and ecosystems on PCL, especially those already under threat. More resources will be required to effectively manage these impacts.

Q3 – 11: Access Charging

Site-based Charges

We do not agree with access charging at specified sites for visitors. This option has a number of potential problems:

- relatively high costs to collect and administer revenue;
- requirement for very limited access points to each area to ensure everyone pays as they enter;
- potential to shift visitor pressure to areas not attracting an entrance fee, which may not be able to sustain increased visitation (either because of facilities and/or biodiversity/ecosystem constraints).

Estate-based Charges

We believe the "Parks-pass" approach (Section 6.2) to charging for access to PCL is the most effective, efficient and sustainable model.

This allows for a one-time payment to access all and any areas of the conservation estate, as appropriate. The pass should be readily available on-line, particularly at the point of flight bookings and payment of the International Visitor levy (IVL), and at DOC offices and information centres. Collecting revenue therefore becomes streamlined and efficient.

There would still be a requirement for checking of passes within PCL, but this requires considerably less personnel time and investment in infrastructure than collecting access fees at the site level.

Who to Charge? (Section 5)

NO Charges for New Zealanders

We very strongly advocate for NO access charges for citizens and residents of Aotearoa New Zealand. The conservation estate is critical to our identity as a nation and as individuals, and we must ensure that the conservation estate is accessible to all who live here (and who pay tax here).

Introducing access charges for New Zealanders will impose barriers to access for many groups in society, and all should have equal right of access to PCL, regardless of economic status. We all have a responsibility to nurture the whenua and to nurture ourselves through spending time in unmodified, biodiverse ecosystems, communing with te taiao and Papatūānuku.

Instead, we strongly advocate for a **Parks-pass system** for **adult overseas visitors**.

It would be an additional charge to access PCL, over and above the IVL. (It is unclear why visitors from Australia are not required to pay the IVL, despite a high proportion visiting PCL. The missed opportunity of up to \$100m per annum in revenue is regrettable.)

The Parks-pass should also be additional to the fees paid by those using the Te Araroa (TA) trail, but the option for a discount for TA users could be explored.

The Parks-pass could be designed to in tiers, with a pass for a week costing \$x, a month costing \$2x, and a year's pass costing \$3x, for example. It would give visitors the flexibility to visit PCL as and when they choose.

The price of the Parks-pass should reflect the value of the PCL in Aotearoa, which, after all, is a major drawcard for international visitors. It must be high enough to generate sufficient revenue to achieve the key goal of enhanced biodiversity and ecosystem conservation, and to sustain visitor facilities and assets.

Pricing the pass at the upper end of the spectrum is recommended. After all, if a visitor can afford an airfare and associated costs to visit Aotearoa, then the additional charge of a Parks-pass is unlikely to be a barrier to travel. The cost needs to reflect the unique value of the biodiversity, ecosystems and landscapes of Aotearoa, and the resources required to manage the conservation estate.

Creative Thinking: Carbon Offsetting

In addition to a compulsory Parks-pass for international visitors wanting to spend time in areas of PCL, we suggest that DOC teams up with a reputable carbon accounting business to offer

international visitors the option of offsetting their travel carbon footprint through buying credits that fund activities in the conservation estate that increase rates of carbon sequestration.

This offsetting should pay the true cost of sequestration and not a nominal, feel-good cost that bears no resemblance to the actual on-ground costs.

Examples of packages could include:

- for \$x we will undertake an additional y ha of ungulate/possum control in a particular location to enhance carbon uptake;
- for \$y we will undertake revegetation in an area of PCL requiring restoration;
- for \$z we will restore a wetland.

Q12 and 13: Using the Additional Revenue

Option C is the only obvious outcome of instituting a Parks-pass system, i.e. all revenue raised is distributed across the conservation estate, based on need.

We reiterate our **STRONG DISAPPROVAL** of any additional revenue raised by a Parks-pass system being treated as a substitute for appropriate levels of **core government funding** to ensure the conservation estate is healthy and thriving in the face of climate change. The government has a responsibility to fund DOC at a level that allows the department to manage PCL for the highest conservation outcomes now and into the future.

The revenue raised by a Parks-pass system and an associated carbon offsetting scheme should be targeted at advancing conservation outcomes more rapidly than is currently the case, and at enhancing the resilience of our biodiversity, ecosystems and facilities in the face of a rapidly changing climate.

Examples of work funded by a Parks-pass system include:

- restoring corridors across fragmented landscapes to rejoin areas of significance for threatened or vulnerable biodiversity and ecosystems;
- supporting scholarships for research projects to enhance knowledge on the management of threatened species or new techniques to manage invasive species;
- enhancing the utility and resilience of built infrastructure, for example by installing solar panels on frequently used structures in more remote areas or installing more efficient waste treatment systems;
- developing new education and interpretation resources to increase the opportunities for visitors to learn about, and more deeply appreciate, the importance of a healthy Te Taiao.

Q14: Working with Iwi

Tangata whenua obviously have a huge role to play in managing PCL and instituting a Parks-pass system will not change that. It would be expected that consultation with Iwi on spending of revenue raised by the system would be an implicit part of the system.