



A. Permission Application Number and Name of Applicant **SUB 424**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Sonia Harper
Organisation	
Date	09-02-2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

- Granting of 10 year licence term
- Removal of Nga Wai Heke
- Removal of further lifts and replacement with only 2 main lifts
- Splitting of Mt Ruapehu skifield operations at Turoa and Whakapapa
- Introduction of gates and parking fees for carparks

My reasons for my objection or submission are:

- I am in support of granting a DoC license to operate to Pure Turoa Limited to operate the Turoa skifield.
- I am not in support of the short-term nature of the license as it will discourage investment into the mountain facilities. The license period should be the same as currently held by RAL.
- I am not in support of the removal of the Nga Wai Heke and future planned lift reductions as this will decrease the total accessible terrain within the ski field boundary and lead to congestion in the remaining ski area accessible terrain.
- I am not in support of the splitting up of the Turoa and Whakapapa with the two sides of the mountain being run by separate companies.
- I am not in support of the selling of the ski fields to private profit making entities that will look to have a return on their investment removed from the entity instead of the current public benefit entity where all profits must be reinvested into the existing entity
- I am not in support of gates being installed to limit access to the carparks or a fee for parking being introduced as free access to a National Park area is essential; for the wellbeing of every New Zealander.

The outcomes that need to be addressed by this application are:
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

- My preference would be to retain the current license with RAL and that the crown forgive their debt to RAL to allow continued operations as the current license holder on both ski field areas.
- I support the granting of a new license to PTL only as an alternative to RAL continuing to hold the concession to operate to ensure skiing/snowboarding remains on the Turoa side of Mt Ruapehu
- I do not support the reduction of total skiable area being serviced by a reduced number of lifts.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

How do I submit my objection or submission?

A. Permission Application Number and Name of Applicant **SUB 425**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	SUSAN HARRIS
Organisation	
Date	9/02/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

My reasons for my objection or submission are:

The outcomes that need to be addressed by this application are:
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

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How do I submit my objection or submission?

Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.

A. Permission Application Number and Name of Applicant **SUB 426**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Matt Lake
Organisation	
Date	

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The profound economic benefits for Ohakune and the wider Central Plateau area.
The unique heritage and value of the mountain to Maori.
The passion, and business plan displayed by PTL in their proposal to manage and operate Turoa Ski Field.

My reasons for my objection or submission are:

Turoa ski area currently brings in thousands of people into the Ohakune area, which bring massive economic benefits, to accommodation, hospitality and activity businesses alike. Without this demand, many businesses in Ohakune would likely close.

The maunga has protected the local tribe of Ngati Rangi for centuries, and provided PTL works in partnership with the iwi (per te tiriti), this brings benefit to the indigenous population of the area. As a New Zealander of Maori descent, I believe that Maori have a right to see their taonga respected and cherished by all, and to be successful and prosperous in sharing their mountain with New Zealand and overseas guests alike. This is best achieved with a concession, allowing people to experience the mountain from on high, as well as from afar.

In examining the business plan of Pure Turoa Limited, I am excited for the future in what they plan to bring. They display a certain passion and business savy that I have not seen in some time. I understand their proposal to remove lifts may be controversial, however, I believe this is the right decision. Sec 9(2)(a)

makes me aware that the Nga Wai Heke is barely used, but requires a full operational setup, often for only a handful of people every day. I understand that Park Lane and Giant chairs are both well past their use-by date, noting that the machinery is around 50-years-old and relies on old, outdated technology. I also agree that the Movenpick chairlift needs to be replaced, as it can only safely operate at a speed of 2.0 meters per second, which is slow and does not carry as many passengers per hour as a detachable chairlift, which can run at up to 7.0 meters per second. Furthermore, I believe that these two lifts are already redundant, as they run in parallel with each other (something that makes us a laughing stock overseas). Finally, the replacement and removal of these lifts will also correct an unusual situation involving overcrowding, caused by two slow lifts loading adjacent to each other.

I believe that a DOC concession to Pure Turoa is the only way forward, noting that the current not-for-profit setup has clearly failed, and a new solution is needed. Pure Turoa is the most likely solution, with the ability bring Turoa Ski Area into the 21st century.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Grant Pure Turoa Limited a concession to operate a ski field on Mt Ruapehu.

G. Attachments

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How do I submit my objection or submission?

Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



A. Permission Application Number and Name of Applicant **SUB 427**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Sam Bunge
Organisation	
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

My reasons for my objection or submission are:

The outcomes that need to be addressed by this application are:
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

G. Attachments

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OBJECTION OR SUBMISSION

A. Permission Application Number and Name of Applicant **SUB 428**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter

Roger Boyd

Organisation

Liquidation Committee of RAL

Date

6/2/24

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Please see the enclosed
Submission from the Liquidation Committee.

My reasons for my objection or submission are:

Please see the enclosed
Submission from the Liquidation Committee.

The outcomes that need to be addressed by this application are:
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Please see the enclosed
Submission from the Liquidation Committee.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
'Submission'		Contains all points raised by the Committee
PWC 6-Monthly Report 'Attachment A'		Liquidator's Report on RAL

How do I submit my objection or submission?

Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.

6 February 2024

Director General
Department of Conservation
Permissions Hamilton
Private Bag 3072
Hamilton 3240

Attention: Lynette Trewavas, Senior Permissions Advisor

Submission on the Application by Pure Turoa Limited to operate Turoa Ski Area on Mount Ruapehu

From: The Liquidation Committee of Ruapehu Alpine Lifts Limited (in Receivership and in Liquidation) – (hereafter ‘RAL’)

Major Summary Points:

- The Committee opposes the granting of a concession to Pure Turoa Limited (hereafter ‘PTL’).
- The Committee wishes to be heard at any hearing called to consider the application by PTL.

About the Liquidation Committee

- The Liquidation Committee was formed at a creditor’s meeting held via postal ballot on 31 July 2023. The confirmation of John Fisk and Richard Nacey (both employees of PricewaterhouseCoopers) as Liquidators of RAL was confirmed at the same meeting.
- Liquidation Committees are legally constituted entities formed under the Companies Act 1993.
- Section 315 (2) of the Companies Act sets out the various powers of the Committee. Of note is 315 (2) (a) which confers the power to ‘call for reports from the liquidator on the progress of the liquidation’; and 315 (2) (d) which confers the power to ‘assist the liquidator as appropriate in the conduct of the liquidation.’
- The Committee takes its duties and powers under the Companies Act very seriously. To this end, the Committee is currently engaged in legal action in the High Court against the Liquidators. The dominant purpose of this action is to establish the principle that all Liquidation Committees are entitled to legal funding from funds held by the Liquidators. Subsequent to the filing by the Committee, the Liquidators and Receivers of RAL filed proceedings opposing the action by the Committee.

- The current legal action in the High Court is not likely to be settled for several months. A final ruling in favour of the Committee is very likely to very significantly alter the type of entity that could be established to operate both skifields on Mount Ruapehu, and this entity in the Committee's view would be both more financially viable, and confer greater public benefits, than the proposal by PTL. We therefore consider a decision in favour of any applicant for a new concession is inappropriate and unwise until, at the very least, the outcome of the current legal action involving the Committee is determined.

Objections – Financial

- Liquidation Committees are legally composed of creditors or shareholders of the relevant company, and have the duty of protecting the interests of unsecured creditors. Therefore the Committee's orientation is inevitably financial.
- However, it should be noted the sole reason we are in the current process with RAL of administration, receivership, liquidation, and now receivership and liquidation, is also solely financial. RAL failed financially. After 70 years of continuous operations. A remarkable feat of operational endurance. No others factors materially impacted the failure. Not environmental, not cultural. Therefore, the major and critical hurdle for any prospective new operator is whether the operation will be financially viable? Whether it is likely to be able to commercially survive?
- Likely commercial viability is specifically mentioned in the matters to be considered by the Minister in considering an application for a concession. At 17U of the Conservation Act 1987 'Matters to be considered by the Minister': (1) In considering any application for a concession, the Minister shall have regard to the following matters:

17U (6) (c) 'the competent operation of the activity concerned'; and related to this:

(7) 'For the purposes of subsection (6), the competent operation of an activity includes the necessity for the activity to achieve adequate investment and maintenance'. In other words, commercial viability.

The general commercial uncertainty or fragility of an applicant is also covered by:

(8) Nothing in this Act or any other Act requires the Minister to grant any concession if he or she considers that the grant of a concession is inappropriate in the circumstances of the particular application having regard to the matters set out in this section.

- The written material supplied by PTL in its application runs to around 280 pages. Of this, the company's financial projections, contained in Appendix 7, run to just one page, and indeed could easily be fitted in about half of a standard page. There is a Profit and Loss statement, covering the three years 2024 to 2026, containing just four line items. There is also a Funding Statement, covering the same years, which has just three line-items. All of the figures have been obscured, and therefore cannot be viewed by other parties.
- The supplied financial material is totally inadequate to judge the commercial viability of the PTL proposal. The Committee contains members with many years experience of assessing new business proposals. At the heart of those proposals is always the financial projections. Which generally run to many pages. And the key variables looked at are the assumptions underlying the summary line-items. PTL has supplied no information to credibly enable a financial assessment of its proposal. Nothing at all.
- For many decades, selling Life-Passes was the major funding mechanism for RAL. There are now around 14,000 Life-Pass Holders. The original PTL proposal presented in mid-2023 did not honour Life-Passes, and our understanding is this has not changed. Life-Passes were able to be used on both Whakapapa and Turoa in 2023. It is a rule of thumb that skifields move into profit by the sale of food and beverage, lessons, and rental equipment. If their passes are not honoured in 2024 by PTL, it will be the first ever year this has happened. Life-Pass Holders are likely to stay away from Turoa in their thousands, significantly denting the company's cash flows.
- Recent trading results for Turoa seen by the Committee suggest that Turoa as a stand-alone entity is a financially marginal operation. It needs Whakapapa to survive. Uncoupling it from Whakapapa, and adding in the likely drop-off in revenue from Life-Pass Holders, suggests Turoa under PTL would likely be a loss-maker from Day 1, requiring regular capital injections.
- PTL's company structure consists of two Directors and one Shareholder, an Advisory Board, and an eight-person Management team. None of these people can be publicly identified as all have been obscured in the application. It is curious why these individuals would want to remain unidentified with their own proposal, given how much merit they argue it has.
- New Zealand has two major commercial ski operators: NZ Ski and Real NZ. Both had long experience in either the ski industry, or tourism, or both, before entering the ski market. The terrain at Turoa is an order of magnitude greater than anything those companies have to deal with. It requires people with deep experience and expertise in the ski industry. PTL was only formed in 2023. What little has emerged about it suggests the people behind it appear to lack the required experience and expertise.

- By contrast with PTL, credible financial results are available for RAL. These are contained in Appendix B and D of the 'Liquidators First Six Monthly Report for Ruapehu Alpine Lifts Limited (in Receivership and in Liquidation)', released by PWC in late January 2024 (attached as 'Attachment A'). This financial information covers the period 21 June 2023 to 20 December 2023. In other words, the 2023 ski season.
- The most revealing information about the current financial state of RAL is presented on page eight of the PWC report. This is called 'A Statement of Receipts and Payments.' It is not therefore a traditional Company Profit and Loss Statement, but a mixture of a Profit and Loss and a Cash Flow Statement, appropriate for a Liquidator's Report. However, it can easily be reconfigured to a Profit and Loss Statement by removing the items that never appear in a Profit and Loss Statement. This gives an accurate picture of the current trading profitability of RAL. So:

RAL Profit and Loss Statement – 21 June 2023 to 20 December 2023

-From **Receipts** remove 'Funding from Secured Creditors' \$3,000,000
 This reduces 'Total Receipts' by this amount, \$3,000,000
 What remains is solely 'Trading Receipts'. A total of \$22,157,000

-From **Payments** remove:

Voluntary Administration Costs	\$1,535,000
Liquidation Costs	\$ 568,000
Maintenance and Capex 2024 Prepayments	\$3,035,000
Transfer to Receivers	\$2,500,000
<u>Total of Items Removed</u>	<u>\$7,638,000</u>

This gives:

Trading Receipts	\$22,157,000
Trading Payments	\$12,553,000
<u>Trading Profit</u>	<u>\$ 9,604,000</u>

RAL is a public benefit entity, and as such does not pay tax. Therefore the Trading Profit figure of \$9,604,000 is the final Net Profit figure for RAL over the period 21 June 2023 to 20 December 2023. By any measure, RAL is solidly profitable as a trading entity. Profitability should rise further as skiers and snowboarders return in increasing numbers once they are secure in the knowledge the company will survive, and RAL consequently starts selling season and discounted passes in October and November like its South Island competition, rather than currently in April or later.

Of note in the current period is that the greatest drain on the profitability of RAL is the cost of the Voluntary Administration, Liquidation and Receivership, a combined total of \$4,603,000.

The prior information shows RAL to be solidly, even highly profitable, on a traditional Profit and Loss basis. However, cash flows are also important as they, among other things, take account of payments when they are actually made, rather than whether they are appropriate to a particular accounting period. On this basis a Cash Flow Statement for RAL for the period can be constructed from the information supplied by PWC:

RAL Cash Flow Statement 21 June 2023 to 20 December 2023

The only item to be added back to the previous Profit and Loss Statement are '2024 Maintenance and Capex Prepayments', a combined total of \$3,035,000. This gives:

Trading Cash Flows	\$22,157,000
Less Operating Cash Flow Expenses	\$15,588,000
<u>Net Operating Cash Flows</u>	<u>\$6,569,000</u>

Once again, RAL emerges as currently a solidly financially sound entity.

- In their Six Monthly Report PWC, at page 10, also include what they term a 'Statement of Affairs'. This is not a traditional Balance Sheet. It is very much a Liquidator's version of a traditional Balance Sheet. It takes the book value of assets, while remaining silent on the likely realisable value of those assets, and measures that figure against the claim on the assets. It produces these numbers:

Surplus after accounting for preferential creditors	\$22,605,000
Less amounts owed to unsecured creditors	\$44,643,000
<u>Total Shortfall to all Creditors</u>	<u>\$22,038,000</u> (1)

- (1) Technical Note: The PWC report states the shortfall as \$22,037,000. But this figure is incorrect based on the figures provided.

Amongst unsecured creditors, the claims of Life-Pass Holders are put at \$32,063,000. The Liquidators provide no detail as to how they arrived at this figure. However, this number assumes RAL is liquidated. On the basis this does not occur, and Life-Passes continue to be honoured, this claim against RAL disappears, producing a **surplus** of \$10,025,000. While the 'Statement of Affairs' is not a traditional Balance Sheet, it suggests there is some strength in the RAL asset position on a going-concern basis.

- With the ‘sale’ of the ANZ’s debt to CRHL, well over half of the debt of RAL (which has low book Balance Sheet equity) is owned by the Government. With this level of debt, the debt is effectively equity. The Government therefore is already the de facto owner of RAL. Given that, RAL’s Balance Sheet can be regarded as being very strong, the same as any other Government-backed entity.

Objections –Operational

- PTL plans to remove the Nga Waiheke lift and not replace it. This removes a massive amount of terrain to the right of the main lifts, and will dramatically reduce the quality of skier experience at Turoa.
- PTL also intends to remove two other main lifts. This will also significantly lower skier experience on Turoa. These lifts also play an important part in skier safety, given the extreme conditions experienced on Turoa. With only two lifts on the mountain, the public will be dangerously exposed in the event of lift failure during severe weather events.
- The near 20% reduction in maximum ski numbers on Turoa planned by PTL will significantly reduce the number of people who can enjoy the mountain, and will have negative effects on local businesses.
- Successful ski fields are characterised by adding more lifts and terrain, not reducing them. For instance, Australasia’s most financially successful skifield, Cardrona in the South Island, added a fourth lift to the existing three in 2022, and has announced it will be adding a fifth lift for the 2025 season. Both additional lifts are in new terrain, doubling Cardrona’s total skiable area.
- PTL’s plans for Turoa offer skiers a much diminished experience over what exists currently.

Objections – General

- In approving the acquisition of Turoa by RAL in 2000 the Commerce Commission stated combining the two skifields would produce a public benefit. It follows that separating them will produce a public harm.
- All of the major changes outlined by PTL occur in years five to ten. The company essentially intends doing nothing in the first five years. The proposal therefore carries an aroma of simply ‘having a go’ for a few years and seeing if things work out. If not, pull the plug. And if things don’t go well, it might be the last-ever time any lifts run on the Turoa Ski Area.
- PTL’s timeline includes a review after three years. But this is just a check against a few pre-identified non-operational matters. If the pre-selected benchmarks are met, it’s an automatic pass mark. This looks like an avoidance of genuine scrutiny.

Summary, Conclusions, and Recommendations

- The Liquidation Committee takes its statutory role as the guardian of the interests of unsecured creditors very seriously. The Committee's current Court actions involving the Liquidators and Receivers is evidence of that. The Liquidator's First Six-Monthly Report details that Life-Pass Holders at \$32,063,000 constitute 72% of all unsecured creditor claims, and are the biggest class of creditors of RAL at 42.3% of all creditor claims.
- The PTL proposal offers nothing to Life-Pass Holders. The Liquidation Committee has no intention of sitting idly by while the claims of the biggest creditor class of RAL are extinguished. It should be borne in mind that Life-Pass Holders have been the longest and most reliable source of funding for RAL.
- In his role as Voluntary Administrator, John Fisk from PWC has acknowledged that if Life-Pass Holder claims should ultimately be accorded no value, he expected individual and class-action legal claims would be filed by Life-Pass Holders.
- The critical factor in considering the PTL proposal is assessing whether it is financially viable. PTL however has provided no public information, nor it seems any substantial private information, to credibly decide that issue. Impacting the financial, the company has also provided no public information on its key personnel to enable an assessment of their suitability to run a challenging business.
- If PTL is receiving preferential financing from the Government on non-commercial terms, the details of that financing need to be made public. The commercial viability of the PTL proposal needs to be assessed as if such financing were not in place, as it may be short-lived.
- Operationally, the proposal will produce a lower customer experience than what is offered currently, and potentially raises the risks to skiers through the removal of key lifts.
- By contrast, the current skifield operator, RAL, has publicly produced information that shows it is trading profitably. It has 70 years experience of trading in the environment of Mt Ruapehu. It also provides the public benefit of keeping Turoa and Whakapapa Skifields under the umbrella of the same company. The 'perfect storm' of factors that have produced the current situation (covid, a 'no-snow' season, arguably inappropriate management decisions), are not likely to recur.
- The Committee acknowledges that the current application by PTL may be problematic for DOC. The applicant is the preferred bidder of a Government agency, and the proposal will apparently be 25% funded by the Government. DOC is a Government agency, and it is our understanding DOC has been directly involved in the RAL receivership/liquidation process.

- In the chapter on Ruapehu in his book ‘Snow Business: Sixty Years of Skiing in New Zealand’ author Ralph Markby says this:

‘During the long history of Mt Ruapehu’s development as an alpine playground, the Tongariro National Park Board stands out as a good administrator and environmental watchdog. As times have changed it has responded appropriately, doing the best it could at the Whakapapa Ski Area, benefiting from hindsight at Turoa, and stopping commercial development altogether at Tukino.’

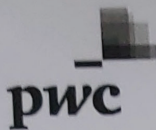
That is a proud legacy for DOC to uphold. But the Committee is confident the Department has the same even-handedness, values, and genuine concern for the best long-term interests of Ruapehu as that of its predecessor agency.

- It should be emphasised that both PTL and RAL are, to differing degrees, owned by the Government. PTL has received significant Government funding, and the Government is apparently taking a 25% equity stake in the company. RAL is already effectively owned by the Government. It is wrong to think one is a private company, and the other something else. They both have significant Government involvement.
- The Liquidation Committee is currently actively pursuing better options for Turoa than that of the PTL proposal. These centre around reviving RAL, with appropriate changes in funding, governance, and management.
- There are a number of decisions that could be made on the PTL application:

-The application could be declined under 17U(2)(a) of the Conservation Act on the grounds the information supplied by PTL is insufficient to enable a decision to be made. This is the Liquidation Committee’s preference for what should occur. PTL could reapply at a later stage.

-Under 17SD the Minister could require PTL to provide further information, or under 17SE commission a report or seek advice. The Liquidation Committee believes this is the minimum that needs to occur.

- The decision on whether to grant PTL a concession may be the most significant in the history of skiing on Mt Ruapehu. A bad decision might well prove irreversible. RAL is trading profitably. The Liquidation Committee strongly believes more time is required to allow other, and potentially much better proposals for Turoa to emerge. We consider it is far more appropriate for RAL to continue to operate Turoa in the 2024 season. A better time to consider an application from a new entrant would be in early 2025. The long-term future of Turoa must come first.



Attachment A

Liquidators' First Six Monthly Report for Ruapehu Alpine Lifts Limited (In Receivership and In Liquidation) - (the Company)

Company Number: 8273
Company NZBN: 9429040950211

Introduction

As you may be aware, Richard Nacey and John Fisk were appointed joint and several Voluntary Administrators of the Company on 11 October 2022 pursuant to section 239I of the Companies Act 1993 ("the Act").

The Watershed Meeting of Creditors to decide the Company's future was held on 20 June 2023. The outcome of the meeting was that neither a resolution to execute a Deed of Company Arrangement, or a resolution to appoint a Liquidator was passed. As a result, control of the Company was returned to the Directors, and the Voluntary Administration came to an end.

Prior to the Watershed Meeting, the Directors of the Company filed an application in the High Court (to be heard after the Watershed Meeting), to place the Company into liquidation if neither the resolution to execute a Deed of Company Arrangement, nor the resolution to place the Company into liquidation were passed at the Watershed Meeting. The reason for the application was that the Company was insolvent (with liabilities significantly exceeding the realisable value of its assets) and the Company had insufficient cash to pay its debts as they fell due. The funding available to the Administrators to trade the Company was not available to the Directors, and the Company would not have any other source of funding. The best course of action available to the Directors was to have the Company placed into liquidation.

The Company was placed into liquidation by the High Court at Auckland pursuant to section 241(2)(c) of the Act at 10:09 am on 21 June 2023. Richard Nacey (Insolvency Practitioner Registration No. 69) and John Fisk (Insolvency Practitioner Registration No. 18) were appointed joint and several Liquidators.

Restrictions

This report is based on information currently available to the Liquidators and is subject to the Restrictions in Appendix A. Liquidators' reports are sent out one month after the appointment of Liquidators, once every six months and upon completion of the liquidation.

Statement of Affairs

Attached as Appendix D to this report is the statement of affairs for the Company as at 21 July 2023 (together with a list of all known creditors at that date, at Appendix G) that were previously provided with our first report to creditors.

An updated statement of affairs as at 20 December 2023 is provided at Appendix D. A statement of receipts and payments to 20 December 2023 is provided at Appendix B. A summary of the Liquidators fees and expenses paid in the period to 20 December is included at Appendix C.

Conduct of the liquidation in the Preceding Six Months

Shortly following appointment the Liquidators determined that the best outcome for creditors was likely to be a sale of the business and assets of the Company as a going concern. In order to preserve the value of the business, the Liquidators made the decision to continue to trade the business through the 2023 winter season while a sales process was carried out.



Appendix D

Ruapehu Alpine Lifts Limited (In Receivership and In Liquidation)

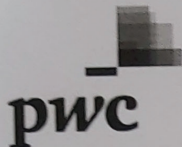
Statement of Affairs as at 20 December 2023

	(\$'000's) Notes	Book Value (\$)	Estimated to Realise (\$)	Updated Estimated to Realise (\$)
Assets available for specific secured creditors		0	0	0
Less amounts owing to specific secured creditors	1	82	Unknown	Unknown
Surplus to specific secured creditors		0	Unknown	Unknown
Assets available for general secured creditors	2	52,829	Unknown	Unknown
Plus surplus available following payment of specific secured creditors		0	Unknown	Unknown
Less amounts owing to general secured creditors	3	31,173	Unknown	44,943
Surplus to general secured creditors		21,656	Unknown	Unknown
Assets available for preferential creditors	4	753	Unknown	Unknown
Surplus available following payment of general secured creditors		21,656	Unknown	Unknown
Fixed assets not subject to security	2	0	Unknown	Unknown
Funds held in bank on day of appointment	5	0	0	0
Accounts receivable & outstanding retentions	6	227	Unknown	227
Overdrawn shareholder current account	1	0	0	0
		22,635	Unknown	Unknown
Less amounts owed to preferential creditors				
Applicant creditor costs	7	0	0	0
Employees	8	0	0	0
Inland Revenue	9	30	Unknown	30
		30	Unknown	Unknown
Surplus after accounting for preferential creditors		22,605	Unknown	Unknown
Less amounts owed to unsecured creditors (General)	1	12,580	12,580	12,580
Less amounts owed to unsecured creditors (Life Pass Holders)	10	32,063	32,063	32,063
Total amount owing to unsecured creditors	11	44,643	44,643	44,643
Total shortfall to all creditors		-22,037	Unknown	Unknown

This statement is subject to the costs of the liquidation.

Notes

- Book value is based off the Company's management accounts as at 11 October 2022.
- The receivers are now undertaking the sale of the business and assets, so the Liquidators are not in a position to provide an estimated realisation.
- Estimated to realise general secured creditor debt includes lending made to the Company by CRHL and ANZ during the Voluntary Administration and Liquidation, less any repayments made. Amount also includes \$13.5m debt to Bondholders in respect of the Sky Waka Gondola.
- Book value is based off the Company's management accounts of inventory on hand as at 21 June 2023. Liquidators have sold \$377k (at cost) through trading during the winter 2023 season. Residual inventory is controlled by Receivers as preferential claims have been paid in full.
- Funds held in the bank account on day of appointment were secured to CRHL and ANZ or subject to preferential claims by the voluntary administrators.
- Book value is based off the Company's management accounts of accounts receivable as at 21 June 2023. The liquidators collected these amounts in full.
- As confirmed in the Court Order placing the Company into liquidation.
- Employee preferential entitlements of \$663k were paid in full by the voluntary administrators.
- Proof of Debt received upon our appointment as liquidators. Inland Revenue has received a full distribution of its preferential claim.
- This is a contingent liability, and based on the valuation undertaken by the voluntary administrators.
- This amount excludes any potential or contingent claim from the Department of Conservation (DoC) for remediation costs that DoC may claim pursuant to the concession agreements with the Company.



Appendix B

Ruapehu Alpine Lifts Limited (In Receivership and In Liquidation)

Statement of receipts and payments

For reporting period 21 June 2023 to 20 December 2023 \$'000s

Receipts	
Funding from Secured Creditors	3,000
Trading receipts	22,157
Total receipts	25,157
Payments	
Payroll Costs (including PAYE)	(6,756)
Stock purchases	(1,681)
Insurance	(841)
Property leases	(29)
Maintenance expenditure incl 2023 indents	(633)
Supplier Payments	(2,582)
VA costs - PwC fees	(864)
VA costs - Legal fees	(295)
VA costs - Repayment to ANZ	(376)
Liquidator Costs - PwC fees	(301)
Liquidator Costs - Disbursements	(25)
Liquidator Costs - Legal fees	(242)
Cash withdrawal (for cash held onsite for floats)	(30)
FY24 maintenance indent prepayments	(622)
FY24 capex prepayments (including Doppelmayr contract)	(2,413)
Transfer to Receivers	(2,500)
Total payments	(20,191)
Net Receipts and Payments	4,966
Opening bank balance	nil
Net Cash Movement	4,966
GST collected and not yet paid (received)	(176)
Closing bank balance	4,790

Note: the Statement of Receipts and Payments does not include the balance of funds drawn down under the CRHL facility and immediately paid to the receivers (\$2.0m), as these funds were never available for use by the liquidators.



A. Permission Application Number and Name of Applicant **SUB 429**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Nikki Ross
Organisation	
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

My reasons for my objection or submission are:

The outcomes that need to be addressed by this application are:
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

How do I submit my objection or submission?

Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



A. Permission Application Number and Name of Applicant **SUB 430**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Stephen Prednergast
Organisation	
Date	09 February 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Refer to Attached Document

My reasons for my objection or submission are:

Refer to Attached Document

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Decline the application.

If the Dept chooses not to decline then comprehensive and specific documentation needs to be developed by the Applicant to enable a proper consideration of an amended Application.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
Turoa Submission – 2024-01	PDF	Multi page PDF document encompassing my submission.

How do I submit my objection or submission?

Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.

“What’s the hurry to get things wrong? You want to take your time to get it right.”

Ruapehu district councillor Fiona Kahukura-Chase – *Newsroom*, 20 June 2023

I wish to initially address the role DOC has played.

DOC has fatally prejudiced it’s regulatory role

It is my view that DOC is unable to objectively consider this application because of the following conflict :

- DOC served as the government creditor during the watershed meeting and in that capacity voted in support of PTL. In usual circumstances DOC by it’s own admission would abstain from participation. It did not on this occasion officially because of Cabinet instruction, but at the behest of MBIE and Treasury.
- In doing so it has pre determined its position for this matter.

DOC cannot objectively make a recommendation on this Application let alone act in delegation for the Minister. It’s administration of the Application process may be sufficient to render it invalid.

DOC is not responsible for Regional Development considerations, those lie squarely with MBIE and other parties.

I make this submission opposing the PTL application for the reasons I will set out below.

The Application has been hastily constructed

- It’s clear from DOC emails that as recently as 30 November DOC was still advising PTL on the substance of what was required to be included in the application.
- There are 54 references to RAL in this application. The bulk of them arise by reliance on historical documents. It is unclear how the passage of time and events has treated these documents and if they are still reliable.
- Given the nature and significance of the concession this degree of, largely avoidable, haste leaves an application littered with contradictions.
- It lacks a number of important and specific components.
 - There is no CIA. It was a notable omission from the 2016 RAL application. It continues to be absent. Indeed the “C” on this application may well be read as meaning commercial.
 - The IDP bares a substantial degree of similarity to the DRAFT 2017 RAL Turoa IDP. Notwithstanding that DOC had specified that PTL would need to provide it’s own assessment. It has not. Cosmetic updates to a draft IDP do not meet the requirement to produce a suitable IDP.
 - The financial modelling supplied covers 18 months this modelling is too short for a licence that has a period of 10 years.
As noted above the cosmetic updates to the original (RAL) draft IDP still rely on longer timeframes, to justify the forecast capital outlay.

- Given the tenuous proposition of MBIE funding there is no guarantee this will eventuate or be reliable in the future. Indeed based on the reportage of the WHL bid being withdrawn, the taxpayer contribution has already started to erode.
- The applicant refers (p28) to RAL behaviour as an indication of compliance with policy. RAL is not the applicant and this reliance provides no comfort that the applicant will behave as required. Indeed it further indicates that the applicant has some way to go before it properly digests and understands the responsibilities of the concession.

The applicant should display capability in the Application

- This is a new application by an untested operator, it should be well constructed – it is not.
- The Application explicitly describes itself as a “like for like replacement” of the existing licence.

This is not born out by :

- Governance considerations which are yet to be disclosed and may not even be confirmed.
 - the duration sought
 - the fundamental considerations, that in 2016 were subordinated by similar assessments for the earlier Whakapapa application
 - the untested nature of the operator or
 - the commercial aspects compared to the public benefit entity status of RAL.
- The heavy reliance on legacy documents and artefacts, as well as management and staff, provides a façade of continuity. However as I note above this is a new operator.
- In the proposed commercial scenario there will be no ability to rely on diversification when either financial or operational difficulties arise.
- It is likely that Treasuries summation of execution risk (TSY Ref 20230471) identifies a very high probability of operator failure. This is also reflected in later Cabinet documents.

A high degree of **independent** scrutiny is required to provide confidence that the applicant has both the management and governance experience required. There is no evidence in the application, or in the publicly available information for PTL in lieu.

Any support derived from MBIE assurances cannot be relied upon. Without evidence of the Calibre instructions it is not possible to consider their assessment as either independent or reasonable. This requires much greater transparency than has been displayed to date.

Application documentation does not support investment within a 10 year term

- Given the explicit capability in the Act it is surprising DOC did not return the Application to the applicant for correction of the 10 + 20 proposition.
- Section 17Z of the Conservation Act states
“A lease or a licence may be granted for a term (which term shall include **all renewals** of the lease or licence) “
- PTL requires a much longer term to execute it’s infrastructure plans. The Executive Summary (page 6) states

“To progress these infrastructural upgrade plans, PTL seeks licence certainty through the application for 10 + 20 years.” It continues (page 9)

“Accordingly, the duration of the licence sought is considered appropriate for the level of investment required and in consideration of the long period required before any commercial return on the investment is achieved.”

DOC’s clarification email and the PTL response is in contradiction to the submission. Indeed the reviewer must read this to indicate that the applicant provides no certainty regarding investment within the 10 year licence period. This is relevant to Competent Operation.

Lift replacement and associated capital investment is a cornerstone of this application, and the applicant is saying it is not justified. As noted above this is a commercial operator, who cannot credibly make the case that they are not proposing a commercial return.

Indeed lack of commercial viability is one of their key criticisms of the RAL operating and capital structure, including the life pass model.

Competent Operation

- DOC is explicitly required to consider the competent operation test. The terminology is expansive.
- Does an operator who applies for a 10 year concession using a 30 year investment envelope meet that expansive consideration ?
- I submit that the PTL application does not meet the thresholds required by this test because :
 - The required maintenance and capital investment is not commercially viable inside the licence period, and as noted above, subject to unreliable funding sources.
 - The reduction in facilities proposed in the submitted IDP will result in an unacceptably high risk rating for the remainder, when any of the remaining lift infrastructure becomes disabled by a weather or avalanche event, or mechanical/electrical failure. These events are an accepted part of ski field operation and generally managed by increased loading on secondary infrastructure. Much of that is forecast to be removed by DOC at year 3, at the behest of PTL.
- The cashflow forecast provided by PwC during the Administration process identifies that Turoa has net negative income forecast for the next 10 years. For other forecasts to be acceptable they would need to (a) repudiate the underlying financial data model, which came directly from long term RAL operations and (b) dismiss the economy of grouped resources across both fields.
- There appears to be insufficient consideration of the appropriate corporate process and business systems. These are fundamental to competent operation. At some point in time PTL would need to provision and support a range of corporate applications and infrastructure which are essential to modern business operations. Suitable systems are likely to have a price tag reaching into the million dollar range, with an annual commitment of 1 -2 hundreds of thousands of dollars.

In its 2021 (last) Annual report RAL documented Corporate Support & services of \$496,000 (2020) reducing to \$322,000 (2021). This does not include Software Fees & IT services and supplies of \$633,000 (2020) and \$618,000 (2021) . *RAL Annual Report 2021* .

There is no evidence that this has been considered. It would be a significant oversight.

Impact on Whakapapa and Tongariro National Park

- In the event of any temporary, or longer, closure event due to the above the impact on Whakapapa is likely to result in overcrowding, over loading of slope capacity and unmanageable visitor numbers. RAL exceeded it's maximum carrying capacity on numerous occasions, in the tenure of all of its recent CEOs. *Copland direct communication 2017, similar reportage 2019.*
- These impacts will also be reflected in other parts of TNP, such as roading and vehicle movements, management of sewerage and rubbish, as well as the constraining of Park access to members of the public who are not partaking of the facilities offered by a concessionaire.
- Addressing parking the application forecasts a number of changes. The introduction of barriers, a booking system and car park charges. These changes have been implemented at Whakapapa. It is clear from the public conversation during that period that many people oppose these changes. They replace publicly available opportunities with fee based access, locking out other Park users, they introduce inequities into a historically efficient first in first served system, and they are generally only operationalised for peak weekends. This appears to be an inefficient use of capital.
- In response to 5.2.14 (p28) the Application does not address how public access will be maintained or how the above changes will impact public access for those TNP visitors who are not utilising the facilities provided by the applicant. This was raised as an issue at Whakapapa when bookable parking was introduced.
- In other ski fields, such as Treble Cone, there are incentives applied to assist in maximising car seat utilisation. Cars / vehicles with a full passenger loading are parked closer to the base. This appears simple to understand, and relatively flexible – with a low barrier to implementation. This would also favour families who are introducing future generations of skiers / riders or alpinists.
It's clear that this applicant regards it's proposed solutions as a useful income stream, when other equally and more publicly accepted options exist.

Conclusion

- Being a concession holder in TNP is a privilege and with privilege comes great responsibility. That understanding is not adequately demonstrated in the Application.
- I have provided sufficient grounds to decline the application in its current state.
- There is a reason these applications normally span a number of years. The issues are complex and the required detail is rigorous.
- PTL may be able to achieve sufficient maturity to subsequently apply for a concession, in a more coherent application. That should be the target outcome.

A. Permission Application Number and Name of Applicant SUB 431

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Peter Randy Ilano
Organisation	PowderHorn Chateau
Date	feb.9,2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

My reasons for my objection or submission are:

i support this because ohakune needs the mountain in order to continue all the business around it.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

How do I submit my objection or submission?

Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.

A. Permission Application Number and Name of Applicant **SUB 432**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Steve Tunnicliffe
Organisation	
Date	8/2/24

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. The treaty claims have not been negotiated or settled.
2. The length of the concession is only 10 years.
3. Not enough information to know if Pure Tūroa Limited (PTL) will be financially sound.
4. Reduced access to the mountain if the concession goes ahead.
5. The concession excludes Whakapapa.
6. Very short negotiation and consultation period.
7. Redaction of important information, including parties involved and who owns / controls the company.

My reasons for my objection or submission are:

1. Treaty claims will likely lead to litigation costs & provide no certainty. There is a high risk of subsequent conflict and uncertainty for the ski field depending on the outcome of the treaty claims.
2. The short length of the concession shows a clear lack of a long-term commitment to the operation, to the wider area and increases the risk of asset stripping. It also shows an imbalance between commercial priorities and public interest. Also environmentally, the longer the commitment to a place, the more invested a party is in the sustainability of a place. The PTL concession suggests this is a short turn operation only. Currently there is an existing concession on the site for 60 years.
3. It is difficult to tell if the business will be financially sustainable. There is no information on what DOC and MBIE will need to pay to remove infrastructure from the mountain if the business fails.
4. Increased costs and decreased mountain capacity will make Tūroa less accessible to New Zealanders. The reduction in capacity with the removal of the Nga Wai Heke chair, Giant Chair, and the Wintergarden Platter & the lower capacity of 4500 will increase demand, leading to subsequent price increases which make the cost of accessing this natural resource beyond the reach of most New Zealanders.
5. Competing business interests with Whakapapa and lack of complementary business operation. With no synergy between the two ski fields lowers the chance of mitigating closures / lack of snow across the Mountain – further reducing access for those who have travelled some distance to access the mountain.
6. Previous concessions negotiations took around four years. The short period of time between the consultation period and opening of the 2024 season means that there cannot be full consideration of important aspects.
7. Key information has not been provided. The extensive redaction of names (e.g. Directors of PTL), this information is a matter of public record and should not be redacted.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Reject the application as the concession needs to be for a longer period of time (minimum 30 years).
Any concession needs to show partnership and/or endorsement from local iwi.

Keep the existing RAL concession in place as it provides a safe working relationship while the treaty claims are being negotiated.

Reject the application as any concession should be for the whole mountain, both Whakapapa and Tūroa.
Any concession needs to show active consideration of ongoing accessibility to the Operation within this National Park. Especially as a non-profit operator is seen as being more compatible with public access to a National Park environment.

G. Attachments

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How do I submit my objection or submission?

Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



A. Permission Application Number and Name of Applicant **SUB 433**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter

Sara Nikora

Organisation

Date

8/2/24

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Pure Turoa are locals who know the area + maintain well, as well as being businessmen if they go ahead it will be good for all businesses in town

My reasons for my objection or submission are:

~~My~~ I agree with the submission for pure turoa to go ahead.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

[Empty text box for outcomes to be addressed]

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

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Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



A. Permission Application Number and Name of Applicant **SUB 434**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Hamish Nikora
Organisation	—
Date	8/2/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I want to see Ohakune and its businesses thrive under the ownership of Pure Turoa.

My reasons for my objection or submission are:

To help build the case for Pure Turoa to get the mountain. It will be great for Ohakune businesses.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

How do I submit my objection or submission?

Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



A. Permission Application Number and Name of Applicant **SUB 435**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Rose Jayne Ilano
Organisation	PowderHorn Chateau
Date	Feb.9,2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

My reasons for my objection or submission are:

I support this application. and my reason is Ohakune needs the mountain to continue its life,business around it. The Mountain is the center of Ohakune, the MOUNTAIN gives life to all here.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

How do I submit my objection or submission?

A. Permission Application Number and Name of Applicant **SUB 436**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Richard Neeson
Organisation	Self
Date	9/2/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Part 2.2
Part 2.5
Part 4.2

My reasons for my objection or submission are:

Part 2.2. There is a current concession in place that can operate Turoa Skifield until 2042. Ending that concession will and compromise RAL Creditors. It will diminish the present customer experience by narrowing the scope of the products offered, that is, access to one skifield instead of two, when purchasing season passes or multi day and multi season passes. Compromising customer experience and services may negatively effect financial returns to the skifield operator and effect spending in the surrounding towns.

Part 2.5. The removal of ski lifts and lessening of capacity will negatively effect customer experience and financial returns. These are both critical to the success of any operator of the Turoa skifield.

The planned construction of a new lift to replace the Movenpick is ideal, however the financial burden of raising \$25m to furnish this will be huge strain on the financial viability of any operator there.

Part 4.2. Collectively iwi of the Maunga oppose the sale of any of the skifields to private ownership until their Treaty claims over the Tongariro National Park are settled. Until that position of iwi changes I can not support a process that ignores their position.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Part 2.2. Continue operating the two skifields under one entity that will be supported by present RAL creditors and a wider customer base due to a wider range of products being available.

Part 2.5. Have the ski lifts due for removal assessed for soundness and integrity by independent industry experts, to determine if the lifts for removal can be utilised beyond the 10 year timeframe. Thereby avoiding the need for extensive costs of a new lift. Costs that could put such financial stain on the operator that the skifield that they go broke. As is the case presently.

Part 4.2. Determine when and under what terms iwi will collectively agree to new concessions being granted for private ownership of the skifields. Once that is determined that will be the appropriate time to consider new concessions. Not before, in order to respect iwi and their desires over the maunga and for the well being of future relationships to all parties that wish to enjoy the Tongariro National Park.

G. Attachments

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Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.

A. Permission Application Number and Name of Applicant **SUB 437**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Bridget Dougherty
Organisation	
Date	8/2/24

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

All parts. I **support** the granting of concessions to Pure Turoa Ltd.

My reasons for my submission are:

I **support** the granting of concessions to Pure Turoa Ltd because:

- Turoa is what has brought us to Tongariro National Park and the mountains and by extension to Ohakune. As a family we have been visiting and enjoying the area for 25 plus years ^{Sec 9(2)(a)} [REDACTED] Skiing off the high noon and looking up at the summit and around at expansive open terrain is a special and spiritual experience that you don't get at any other field in New Zealand.
- As noted on p35 of the Tongariro National Park Management Plan (2006) Mt Ruapehu is 'nationally important' for skiing as it is the only place in the North Island where lift-serviced alpine snow sports can be provided (notwithstanding a small club field at Taranaki). Given the failure of Ruapehu Alpine Lifts, it is important to ensure that another entity takes over immediately. Snow sports account for about half of all TNP visitors according to the TNPMP.
- The proposal is within the amenity area of Turoa Ski Area identified in the TNPMP and is generally consistent with the TNPMP's objectives.
- Granting the concession would **foster recreation** and therefore be consistent with section 6(e) of the Conservation Act, which states:
"to the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism."
- While there are reasons to consider delaying the granting of concessions until after Te Tiriti o Waitangi claims have been settled, I believe that the applicant's growing relationship with Ngāti Rangī and others, combined with the relatively short term sought (compared with the current RAL concession's 60 years) and the proposal to eventually remove and replace the Ngā Wai Heke, Park Lane, Wintergarden and Giant lifts with one gondola or high capacity chair with a mid-station, plus the fact that the infrastructure will be damaged by ice if not operated each winter, mean granting the concession now and then working with iwi collaboratively is the best approach.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I submit that the Department of Conservation:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area
2. Consider how the term of the concession can be extended to provide sufficient time for payback of the capital investment required to remove and replace some of the lifts as shown in the indicative development plan, while also respecting and providing for collaboration with Ngāti Rangī and any other relevant iwi so that the outcomes of their treaty settlement can be recognised and provided for by the applicant and DOC when the time comes.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 438**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Toby Jacob
Organisation	
Date	08.02.24

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. Increasing the financial risk to DOC who are liable for the estimated \$100,000,000 cost of removing all buildings and infrastructure on Mt Ruapehu if ski field operations on both sides of the mountain fail.

My reasons for my objection or submission are:

1. By separating the Turoa Skifield from the Whakapapa Skifield and operating the two skifields independently more than doubles the very real risk of one or both skifields failing financially. Independent operators do not have the following:
 - Economies of scale, to share staff, leverage purchasing power with suppliers
 - Ability to appeal to the wider group of North Island skifield users. Many Ruapehu Skifield users will not see the flexibility of value they have enjoyed for the last 20+ years and therefore go to other (South Island or international) skifields instead.
 - The ability to absorb the lower revenue days when one side is not open (due to weather or poor snow conditions).
2. DOC is then responsible for managing and funding the cost of removing buildings and infrastructure from the Maunga. This will take years and over \$100,000,000.
3. DOC, the government and the NZ taxpayers cannot afford this cost.
4. Furthermore, the annual revenue of approx \$100,000,000 to the local economy will be lost.
5. All conservation activity costs money. Without the Ruapehu Skifield Revenue, returns to DOC through Concession Fees, Taxes, employing the local community and all the goodwill generated by their operation allows DOC to benefit financially, develop Conservation Activities and improve access and management of the Tongariro National Park.
6. It's likely Iwi groups will restrict or block the Concessions for Turoa and/or Whakapapa, resulting in long, and expensive court proceedings which benefit no-one.
7. The granting of a new Concession to PTL and then a separate Whakapapa Operator will be prejudicial to Tongariro National Park (TNP) treaty claim(s) lead to further court action.
8. There currently remains an existing concession on the site of 60 years for both Turoa and Whakapapa Skifields. It should be kept this way to allow RAL or other single entity to run both skifields.
9. The best way forward is maintain the existing 60 year Concession and work closely with RAL or the new skifield operator to develop Conservation activities and priorities. This is a much safer and prosperous way forward for everyone - DOC, the Skifields, the Skifield users, Iwi and the wider community.
10. **The power is in your hands to make the right decision for all parties and future generations.**

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Please do not approve the concession for PTL. Keep the current Concession in place for one single entity (RAL or other) to operate both Turoa and Whakapapa together.

Keeping the existing RAL concession in place provides a safe working relationship while the TNP treaty claims are being negotiated between the Government and various iwi interests over coming years.

Any concession needs to show active consideration of ongoing accessibility (including socio-economic) to the Operation within this National Park. Especially as a non-profit operator is seen as being more compatible with public access to a National Park environment.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

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How do I submit my objection or submission?

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5. A. Permission Application Number and Name of Applicant

Pure Tūroa Limited 109883-SKI

6. B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

7. C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Peter Collier
Organisation	NA
Date	9/02/2024

8. D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

9. E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

10. F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I object to the proposal to remove the Ngai Whai Heke chairlift.

My reasons for my objection or submission are:

This is because it combined with the High Noon provides an elevation of 609 m (2,000 ft) of uninterrupted run. The unfortunate view that the lift is underutilised is that on most open days some early part(s) of Blue Holiday are not adequately groomed during the day. In fact these parts represent a hazard that puts potential users off.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Given that it is the unmovable intent of PTL, DOC and Iwi to remove the Nga Whai Heke Chairlift, it is therefore a done deal.

An ideal compromise exists, why not reposition the NWH back to its original position when it was the High Flyer. The Top bullwheel will need to be moved downhill slightly to avoid conflict with the High Noon chairs. Otherwise the original tower anchors are still there.

Having restored what was an ideal intermediate/advancing beginner lift between Blyth Flat and the Giant Cafe is a badly needed improvement for improving skiers given the inevitable removal of the giant chair and acknowledged early seasonal receding of snow levels making the riding trails serviced by the Movenpick lift.

Failure to provide upper mountain facilities for beginner/intermediate skier/riders is likely to result in significantly reduced patronage numbers given that the High Noon is largely advanced terrain above the Giant Cafe and often conditions do not permit the High Noon to operate anyway.

Repositioning the NWH up hill to its near original position should be considered as a positive move, if the other proposed removal/demolishments proposed by Pure turoa are proceeded with,

11. G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

How do I submit my objection or submission?

Complete this form and email to mtruapehusubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.

A. Permission Application Number and Name of Applicant **SUB 440**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Liam Buck
Organisation	
Date	8/2/24

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

All parts. I **support** the granting of concessions to Pure Turoa Ltd.

My reasons for my submission are:

I **support** the granting of concessions to Pure Turoa Ltd because:

- Turoa is what has brought us to Tongariro National Park and the mountains and by extension to Ohakune. As a family we have been visiting and enjoying the area for 25 plus years ^{Sec 9(2)(a)} [REDACTED] Skiing off the high noon and looking up at the summit and around at expansive open terrain is a special and spiritual experience that you don't get at any other field in New Zealand.
- As noted on p35 of the Tongariro National Park Management Plan (2006) Mt Ruapehu is 'nationally important' for skiing as it is the only place in the North Island where lift-serviced alpine snow sports can be provided (notwithstanding a small club field at Taranaki). Given the failure of Ruapehu Alpine Lifts, it is important to ensure that another entity takes over immediately. Snow sports account for about half of all TNP visitors according to the TNPMP.
- The proposal is within the amenity area of Turoa Ski Area identified in the TNPMP and is generally consistent with the TNPMP's objectives.
- Granting the concession would **foster recreation** and therefore be consistent with section 6(e) of the Conservation Act, which states:
"to the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism."
- While there are reasons to consider delaying the granting of concessions until after Te Tiriti o Waitangi claims have been settled, I believe that the applicant's growing relationship with Ngāti Rangī and others, combined with the relatively short term sought (compared with the current RAL concession's 60 years) and the proposal to eventually remove and replace the Ngā Wai Heke, Park Lane, Wintergarden and Giant lifts with one gondola or high capacity chair with a mid-station, plus the fact that the infrastructure will be damaged by ice if not operated each winter, mean granting the concession now and then working with iwi collaboratively is the best approach.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I submit that the Department of Conservation:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area
2. Consider how the term of the concession can be extended to provide sufficient time for payback of the capital investment required to remove and replace some of the lifts as shown in the indicative development plan, while also respecting and providing for collaboration with Ngāti Rangī and any other relevant iwi so that the outcomes of their treaty settlement can be recognised and provided for by the applicant and DOC when the time comes.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

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A. Permission Application Number and Name of Applicant **SUB 441**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter

Organisation

Date

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The fields should not be sold to private parties.
The maunga will be subject to treaty claims, so private ownership is unethical.
PTL's proposal reduces the number of lifts.
The concessions applied are for a very short time scale

My reasons for my objection or submission are:

I believe there is no need to privatise either Turoa or Whakapapa ski fields - They should remain publicly owned to ensure access for all New Zealanders long-term.
RAL already holds long-term concessions, so a far safer approach would be to keep RAL operating under improved management.
The concession time applied for is very short.
The maunga will be subject to treaty claims, so private ownership is unethical.
PTL's proposal reduces the number of lifts which will compromise the safety (crowded slopes) and enjoyment. Bottlenecks and long lift queues will badly compromise the experience.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Public/Not-for-profit ownership should continue with debt forgiven to keep a level playing field with offers to private investors.
The fields should both be retained and run by an improved RAL to give the best chance at longevity and at a cost more attainable by the average New Zealander.
Iwi already have a longstanding and beneficial relationship with RAL. Negotiating with separate private entities risks the fields not being accessible or sustainable long term for anyone.
It is imperative the fields have a stable and long term concession to give management the confidence to invest in maintaining and improving infrastructure.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 442**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Romay Rundgren
Organisation	The Lines Company Limited
Date	9 February 2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

This submission relates to the entirety of the application put forward by the Applicant, Pure Turoa Limited.

My reasons for my objection or submission are:

The reason for our submission is to support the Applicant's intention to continue the skiing and recreational operations on the Turoa Ski Area. The continuance of these operations is not only vital for the economic prosperity of the alpine tourism and snow sport industries located in the Ruapehu region but also the local business community who are reliant on the income derived from these industries. The continuance of these operations will also be of great flow-on benefit to the health and wellbeing of the community as a whole.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

N/A

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

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A. Permission Application Number and Name of Applicant **SUB 443**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Vivien Wynne
Organisation	N/A (Individual)
Date	9/2/24

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. The duration of the concession is only 10 years.
2. The Tongariro National Park (TNP) treaty claim(s) have not been negotiated or settled.
3. Not enough information to know if Pure Tūroa Limited (PTL) will be financially sound.
4. The decreased access to the mountain if the concession is awarded.
5. The concession excludes wider alpine snow sports assets on Mt Ruapehu, specifically Whakapapa.
6. Compressed negotiation and consultation period.
7. Redaction of important information, including parties involved and consulted.

My reasons for my objection or submission are:

1. There currently remains an existing concession on the site of 60 years.

The short length of the concession sought indicates a clear lack of a long-term commitment to the operation, to the wider area and opens the door for asset stripping and an imbalance between commercial priorities and public interest. Environmentally, the longer the commitment to a place, the more invested a party is in the sustainability of a place. The PTL concession falls short on this front.

2. Tongariro National Park (TNP) treaty claim(s) may lead to immediate litigation costs.

The well publicised interests of other parties (including those under a Treaty claim) in the existing concession and RAL assets mean that should this PTL concession be awarded at this time, there is high risk of conflict and subsequent litigation which will bleed resources which could otherwise be used to enable and ensure equitable access to the assets and the ski field.

3. It is difficult to tell if the business will be financially viable.

Appendix 7 cash flow model makes it difficult to tell if the business makes commercial sense.

Information provided excludes information on what DoC and MBIE will need to pay to remove infrastructure from the mountain if the business fails.

4. Increased costs and decreased mountain capacity will make Tūroa less accessible to New Zealanders.

The reduction in capacity with the removal of the Nga Wai Heke chair, Giant Chair, and the Wintergarden Platter and less operational days, longer inactive vs active time on the mountain and lowered accessibility to the Maunga during the operating season. The lower capacity of 4500 would see increased demand, leading to price increases which will take the cost of utilising this natural resource beyond the reach of most New Zealanders.

5. Competing business interests with Whakapapa and lack of complementary business operation.

A lack of synergy between the other snow sports assets on Mt Ruapehu lowers the chance of mitigating partial operational closure across the Maunga – further reducing access for those who have travelled some distance to stay and experience the thrill and majesty of Mt Ruapehu.

6. Past concessions negotiations took around four years.

The short period of time between the consultation period and opening of the 2024 season means that there cannot be full consideration of important aspects.

7. Key information has not been provided.

The extensive redaction of names (e.g. Directors of PTL), this information is a matter of public record and should not be redacted.

Iwi engagement has been completely redacted.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Any concession needs to be for a longer period of time (minimum 30 years).

Any concession needs to show partnership and/or endorsement from mana whenua. Cease ignoring iwi and retract from seeking new concessions, as they have said they will not approve new concessions until Treaty claims are settled on the Maunga.

Keeping the existing RAL concession in place provides a safe working relationship while the TNP treaty claims are being negotiated between the Government and various iwi interests over coming years.

Any concession should be for the whole mountain, being Whakapapa and Tūroa.

Any concession needs to show active consideration of ongoing accessibility (including socio-economic) to the Operation within this National Park. Especially as a non-profit operator is seen as being more compatible with public access to a National Park environment.

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 444**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Timothy Chaplin
Organisation	-
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Environment, cultural & economic benefits

My reasons for my objection or submission are:

Ripping out all the infrastructure that is perfectly working is a huge waste of public money. Ski field has a long running partnership with the local iwi plus iwi are aware of the massive link between the working ski field and the knock on effects of there being no ski field.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Amend as needed

G. Attachments

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Printed name of submitter or person authorised on behalf of submitter	Tony Workman
Organisation	
Date	9.2.24

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Support local businesses and are going to have a positive impact on the environment

My reasons for my objection or submission are:

I support all applications involved with the pure turoa bid

The outcomes that need to be addressed by this application are:
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

G. Attachments

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C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Helen Riden
Organisation	-
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Environment
Cultural
Economic benefits

My reasons for my objection or submission are:

Removal of the ski field assets will be huge in environmental and economic costs.

Skiing has great cultural pulls to all of NZers

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Amend as you feel you need

G. Attachments

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A. Permission Application Number and Name of Applicant **SUB 447**

Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Danielle Robinson
Organisation	Kings Ohakune
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Pure Turoa operating a lease for 10 years

My reasons for my objection or submission are:

Support their application to be leaseholders for the next 10 years

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

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Printed name of submitter or person authorised on behalf of submitter

Organisation

Date

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

We are in favour of Pure Turoas application as we do not want the mountain to close!

My reasons for my objection or submission are:

We ^{Sec 9(2)(a)} are avid skiers. We want to keep the mountain, town, and community alive. It would be a massive loss to the Ruapehu district if the skiing facilities were no longer available.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

We are deeply troubled by the proposed elimination of specific chairlifts. Such a decision could significantly compromise the integrity of the ski resort and pose potential safety hazards for both skiers and snowboarders. Without these essential lifts, individuals may be compelled to navigate the terrain without proper means of transportation back to the base, raising concerns for their well-being. Moreover, the absence of these lifts would raise questions about the effectiveness of patrolling and managing the area, potentially exacerbating the risk of accidents. Not to mention, longer lift line wait times.

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C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Willie Aitken
Organisation	Individual
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

All parts. I support the granting of concessions to Pure Turoa Ltd.

My reasons for my objection or submission are:

I support the granting of concessions to Pure Turoa Ltd because:

- My family have had strong links to the Ruapehu area especially Ohakune and Raetihi. Since the early 1980's. There are five life passes in our immediate family, although Pure Turoa acquiring Turoa means the end of our life passes it is about much more than our life passes. This is about much more than our life passes its about the future of Ohakune and Turoa. Pure Turoa is the only realistic option for Turoa moving forward. Pure Turoa is led by ^{Sec 9(2)(a)} they are both very successful savvy businessmen, passionate respectful mountain users and are very passionate about Ohakune and the surrounding communities. Pure Turoa has a lot of support in the Ohakune area including long standing successful business.
- As noted on p35 of the Tongariro National Park Management Plan (2006) Mt Ruapehu is 'nationally important' for skiing as it is the only place in the North Island where lift-serviced alpine Snowsports can be provided (notwithstanding a small club field at Taranaki). Given the failure of Ruapehu Alpine Lifts, it is important to ensure that another entity takes over immediately. Snow sports account for about half of all TNP visitors according to the TNPMP.
- The proposal is within the amenity area of Turoa Ski Area identified in the TNPMP and is generally consistent with the TNPMP's objectives.
- Granting the concession would **foster recreation** and therefore be consistent with section 6(e) of the Conservation Act, which states:

"to the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism."
- While there are reasons to consider delaying the granting of concessions until after Te Tiriti o Waitangi claims have been settled, I believe that the applicant's growing relationship with Ngāti Rangī and others, combined with the relatively short term sought (compared with the current RAL concession's 60 years) and the proposal to eventually remove and replace the Ngā Wai Heke, Park Lane, Wintergarden and Giant lifts with one gondola or high capacity chair with a mid-station, plus the fact that the infrastructure will be damaged by ice if not operated each winter, mean granting the concession now and then working with iwi collaboratively is the best approach.
- While the prospect of lifts being removed does not fill me with joy Pure Turoa have been left with very little choice. The Parklane was installed in 1978, The Giant in 1979 and the Movenpick in 1987. All three lifts have been loyal servants with the Movenpick being the main work horse since it was installed. Unfortunately, RAL decided to defer maintenance and neglect these lifts over the last ten years. Millions of dollars are currently being spent on the Parklane and Movenpick however this will only give the lifts about five years of life before they need to be removed. This seems to be a fact lost on the Ruapehu Ski fields Stake Holders Association (RSSA).
- Pure Turoa are respecting the wishes of Iwi by reducing the footprint of the ski area by removing the Nga Wai Heke chairlift, this has been heavily criticised by the RSSA and their "executive" Pure Turoa would rather not remove the Nga Wai Heke but they will respect the wishes of Iwi. The RSSA have made it very clear that should the current 60 year concession be retained the Nga Wai Heke will not be removed and will continue to be operated. This stance goes against the wishes of Iwi.

The outcomes that need to be addressed by this application are:
 Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I submit that the Department of Conservation:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area.

2. Consider how the term of the concession can be extended to provide sufficient time for payback of the capital investment required to remove and replace some of the lifts as shown in the indicative development plan, while also respecting and providing for collaboration with Ngāti Rangī and any other relevant iwi so that the outcomes of their treaty settlement can be recognised and provided for by the applicant and DOC when the time comes.

3. Note that climate change will potentially render commercial ski areas on Mt Ruapehu economically unviable at some point during this century if the 2,300m elevation remains the upper limit for development, so allowing lift development in the 1,900m – 2,300m zone within the current ski area boundary may be desirable to ensure that popular and rewarding lift-serviced alpine snow sports can continue on the mountain for as long as possible.

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Pure Tūroa Limited 109883-SKI

B. Name of Proposed Activity and Location(s)

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C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter	Patrick Aitken
Organisation	Individual
Date	09/02/2024

D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
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My reasons for my objection or submission are:

I support the granting of concessions to Pure Turoa Ltd because:

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- As noted on p35 of the Tongariro National Park Management Plan (2006) Mt Ruapehu is 'nationally important' for skiing as it is the only place in the North Island where lift-serviced alpine Snowsports can be provided (notwithstanding a small club field at Taranaki). Given the failure of Ruapehu Alpine Lifts, it is important to ensure that another entity takes over immediately. Snow sports account for about half of all TNP visitors according to the TNPMP.
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- Pure Turoa are respecting the wishes of Iwi by reducing the footprint of the ski area by removing the Nga Wai Heke chairlift, this has been heavily criticised by the RSSA and their "executive" Pure Turoa would rather not remove the Nga Wai Heke but they will respect the wishes of Iwi. The RSSA have made it very clear that should the current 60 year concession be retained the Nga Wai Heke will not be removed and will continue to be operated. This stance goes against the wishes of Iwi.



The outcomes that need to be addressed by this application are:
 Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I submit that the Department of Conservation:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area.

2. Consider how the term of the concession can be extended to provide sufficient time for payback of the capital investment required to remove and replace some of the lifts as shown in the indicative development plan, while also respecting and providing for collaboration with Ngāti Rangī and any other relevant iwi so that the outcomes of their treaty settlement can be recognised and provided for by the applicant and DOC when the time comes.

3. Note that climate change will potentially render commercial ski areas on Mt Ruapehu economically unviable at some point during this century if the 2,300m elevation remains the upper limit for development, so allowing lift development in the 1,900m – 2,300m zone within the current ski area boundary may be desirable to ensure that popular and rewarding lift-serviced alpine snow sports can continue on the mountain for as long as possible.

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