

Submission 1

From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Tuesday, 25 August 2026 5:33:14 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Ivan Krippner
Contact person : [REDACTED]
Email : [REDACTED]
Alternative contact : N/A
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential : Yes
Name of submitter : Ivan Krippner
Organisation : Confidential
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : Form 5a filming pg 104-123 the use of drones within a 4km radius of any known aircraft or helicopter take off or landing zone
Reasons : Flying an drone within 4kms of an aerodrome is not permitted under CAA rules unless certain criteria are met. Consent from the aerodrome operator is one of them, and that is something that we will not do. We have at least four aerodromes within the bounds of the Te Anau lake front, one of these is an instrument helicopter approach. Furthermore, and more importantly, we already have a problem with general public flying drones at the Te Anau lake front legally, there have been several near misses already. I am positive that if public or tourists see a drone flying at the lake front, they will be inclined to join in not realising the complications. The floatplane at Te Anau is a non scheduled Pt 135 operation, meaning there is no set times for takeoff or landing, utilizing many different spots over Lake Te Anau and beyond, and it has been doing so since 1963. To grant this approval with my knowledge would be foolish, and go against all risk adversion protocols. Te Anau lake front, Dome Islands and Gorge Burn falls, are all spots the the floatplane lands, however 4kms north of the Dome Islands up to the Glow Worm Caves we have no issue with. Drones 4km from aerodromes caa In New Zealand, drones must be kept 4km away from all aerodromes to ensure safety and compliance with civil aviation rules. This includes helipads at hospitals and those used by sightseeing aircraft. Within 4km of all aerodromes, you must: Possess an appropriate qualification or be under the direct supervision of someone who does. Never fly over a runway strip or aircraft manoeuvring area. obtain consent from the Aerodrome Operator; and have an observer to maintain situational awareness of surrounding airspace.
Outcomes : I have no problem with the rest of the application other than the potential risk presented by flying a drone in proximity to maned aircraft operating area
File upload :

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From: [kylie \[REDACTED\]](#)
To: [DNSubmissions](#)
Subject: 126048-WAT: Real Journeys Ltd
Date: Wednesday, 26 August 2026 9:03:50 am
Attachments: [Screenshot_20260825_165922_RWY.jpg](#)
[Screenshot_20260825_165556_Chrome.jpg](#)

You don't often get email from [REDACTED] [Learn why this is important](#)

To Whom It May Concern

I have tried many times to submit on the DOC online form but it keeps becoming unresponsive so apologies if this email is a double up.

As the Wings and Water Te Anau Limited CEO, I am submitting against the Real NZ application to operate a drone.

Reasons to support my submission:

1. The floatplanes have been operating off the lakefront on an unscheduled passenger transport service since 1961. It is widely known that the front country is our maneuvering area and where the planes take off and land. Due to the protection provided by Blue Gum Point, this is the only area available to execute take off and landing safely on Lake Te Anau eg. we have limited flexibility to do so elsewhere on the lake as it is exposed to the wind and swell.

2. Permission must be sought under Civil Aviation Rule Part 101 to operate a drone within 4km of a 'runway' or helipad. Where the proposed applicant is planning to film using a drone is within 4km of four separate runways & heliports. This introduces an unacceptable risk to our and others aviation operations. Next to us is Southern Lakes Helicopters helipad, the instrument approach for the medivac Heli Otago machines heading in and out from the Fiordland Medical Centre and the Deaker's strip. The last thing any of us need is a drone appearing in the windscreen to take some marketing footage. The work load of a pilot is greatest when taking off, landing and low and slow. Having to look at drone timings and for the drone itself is an unreasonable expectation for the pilot. And for the floatplane pilot he/she must, in addition watch for boats, boat wake and passive recreational lake users and the avoidance of birds. Birds are a recognized hazard to aircraft, they are moving a lot slower than the potential head-on closing speed of an aircraft and drone. The effect of a drone hitting and passing through into a turbine engine, propeller blade or windscreen would have an immediate and disastrous outcome.

The areas of the Dome Islands and the head of the South Fiord of Lake Te Anau (Gorgeburn Falls) are also areas that the floatplane may be taking off and landing. These areas are also unsuitable locations for drone activity. There is regular helicopter activity between the lakefront and 6 miles north of Te Anau up to and from Luxmore Hut. This flight path should be kept clear of drone activity.

3. It is evident in our safety meetings that there is an increasing number of incursions the past two years involving drones interacting with or close to our aircraft. These incidents are all in the vicinity of the lakefront posing a real threat of collision with aircraft and passengers..

There is concern that the high profile location of where the RealNZ's vessels

launch and proposal to film there is visible to pedestrians and people staying in the hotels, motels and backpackers, beach-goers and Lions Park users. 'Monkey see, monkey do' will increase the number of drone users who will see a drone up and think that it is permitted that they can also fly their drone around the aircraft and within 4km of the aforementioned runways/heliports.

4. Please look at and take into consideration the two links here of drone vs aircraft results;

<https://youtu.be/QH0V7kp-xg0?si=wK6b-4SOwLRPeffo>

Source: Instagram <https://share.google/urlwz93PrKljWFVbC>

The best outcome for this application is that the decision maker(s) put the operators' and public safety as the first and foremost consideration. To grant this application would be similar in risk severity and probability to putting toddlers onto a traffic island of a busy road, it is not a matter of if, but when, the accident will occur. And to grant such a permission would be negligent therefore must be denied.

Feel free to contact me further should you require any information regarding the floatplane operations.

Regards
Kylie Krippner
CEO
Wings and Water Te Anau Limited
PO Box 222
65 Lakefront Drive
Te Anau 9640
Tel [REDACTED] mob [REDACTED]
wingsandwater@xtra.co.nz
www.wingsandwater.co.nz



Boating is a popular activity for many Southlanders and there are a number of areas ideally suited to boating activities. We want everybody to enjoy their time on the water, but there are a few navigation safety rules that apply to ensure everyone stays safe.

Safety information

Wear a lifejacket

All vessels must have suitable lifejackets, easily accessible, for each person on board. They must be worn at all times on vessels 6 metres and under and at times of increased risk on all other vessels.

Communication

Make sure somebody knows where you are going and when you are expected back. Contact Bluff Fishermen's radio on VHF Ch 63. Take at least two forms of communication with you - VHF radio, flares, cellphone in a waterproof bag, EPIRB.

Be prepared

Make sure you have the necessary equipment - anchor, bailer, oars, spare fuel, torch, first aid kit and warm clothes.

Take care

Use caution and ensure you have plenty of room on the water when towing. Watch out for anyone in the water. Lake swimming is becoming more popular in all seasons, so be aware.

Avoid alcohol when boating.

Know the rules

- All vessels, including jet skis, cannot exceed 5 knots within 200 metres of shore. Buoys are in place on Lake Te Anau to mark the 5 knot area.
- Be aware of the take-off and landing of floatplanes - it is your responsibility to keep out of their way.
- It takes three to ski - a boat skipper, skier and an observer (who must be 10 years or older).
- A person under 15 years of age is not permitted to operate a vessel capable of exceeding 10 knots unsupervised.
- Keep to designated ski access lanes. Move in an anti-clockwise direction in the ski access lanes.
- To ensure the area is kept free for everybody to enjoy, don't park your vessel in the ski access lane.
- Access to waterways, wharves or boat ramps must be kept clear.
- Keep to the starboard (right) side of a river channel and if going upstream on a river, give way to a vessel coming downstream.
- If you are involved in a collision or accident, you must notify the harbourmaster and Maritime New Zealand.
- It is your responsibility to ensure you know the navigation safety rules. You may be subject to an infringement fee for offences against the Southland Regional Council Navigation Safety Bylaws 2009 (revised 2015) for breaching any of the rules. Full details can be found at www.es.govt.nz

Published by Environment Southland, September 2021



Navigation Safety Guidelines

Lakes Te Anau & Manapouri



ENVIRONMENT SOUTHLAND
For now & our future

0800 76 88 45 | service@es.govt.nz | www.es.govt.nz
facebook.com/enviromentsouthland



Waterski lanes

- Waterski access lanes on Lake Te Anau at Blue Gum Point, Dock Bay and Broad Bay are marked with black and orange posts on the shore and buoys on the lake.
- Waterski access lanes on Lake Manapouri at Surprise Bay and Frazers Beach are marked with black and orange posts on the shore and buoys on the lake.

Floatplanes

- Watch out for floatplanes taking off and landing on Lake Te Anau.



BOATING NAVIGATION TIPS

Vessels overtaking: Every overtaking vessel gives way, including sailing boats.



Power vessels head on: Both alter to starboard (right).



Power vessels crossing: Power vessels give way to others on their starboard (right) side. Give way boats should cross behind (sailing boats have different rules).



Speed limits

Watch your speed near the shore, wharves and jetties. Do not exceed 5 knots within:

- 200m of the shore or any structure
- 50m of another vessel
- 50m of a person in the water

Waiau River - Between Lakes Te Anau and Manapouri

- 5 knots from The Outlet to 1.6km downstream.
- From 1.6km downstream of Lake Te Anau to Lake Manapouri from sunrise to sunset - speed up-lifting.

Waiau River - Downstream of Lake Manapouri

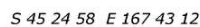
- 5 knots from Pearl Harbour to the Mararoa Weir.

Lake Te Anau

- Slow through the Dome Islands - 5 knots.



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Submission 3

From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Thursday, 3 September 2026 5:18:04 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Cruise Te Anau Ltd
Contact person : Chris Musgrave
Email : info@cruiseteanau.co.nz
Alternative contact : [REDACTED]@cruiseteanau.co.nz
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential : Yes
Name of submitter : Chris Musgrave
Organisation : Cruise Te Anau Ltd
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do wish to be heard in support of this objection or submission at a hearing
Specific parts : All parts except the Glow Worm cave excursions
Reasons : As attached
Outcomes : As attached
File upload : [Cruise_Te_Anau_Submission_on_RealNZ_Concession_Application.pdf](#)

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SUBMISSION

Real Journeys Limited concession application

Lake Te Anau / Te Ana-au and Fiordland National Park

Submitter	Cruise Te Anau
Owners/operators	Erica and Chris Musgrave
Date	22 August 2026
Application	Application from Real Journeys Limited
Position	Support continuation of existing core access; oppose the proposed expansion unless substantially restricted and independently assessed

Relief sought

Retain RealNZ's established Glowworm Caves transport and necessary wharf activities, but decline or materially narrow the new authority for up to 960 scenic/charter trips per year across Lake Te Anau, including South Fiord, and do not grant a broad 30-year drone filming authority. Require route-specific wake, navigation, wildlife, visitor-experience and aviation assessments before any expansion is authorised.

1. Executive summary

Cruise Te Anau supports responsible tourism and recognises RealNZ's long-established role in carrying visitors to the Te Ana-au Glowworm Caves. Our concern is not the continuation of that core service. It is the scale and breadth of the additional rights sought: scenic and charter cruising anywhere in the relevant front-country and northern backcountry settings, a maximum party size of 99 passengers plus crew and staff, up to 960 scenic/charter trips each year, additional or replacement vessels, South Fiord operations, and promotional drone activity over a 30-year term.

The application treats these activities largely as an extension of existing lake use. In South Fiord, however, the operating environment and visitor use are materially different. It is narrower, more enclosed and valued for quiet, low-volume experiences. Cruise Te Anau's guests may be on a small vessel, stationary close to waterfalls or beaches, walking ashore, fishing, or transferring to a floatplane. Wake and noise that may be tolerable on an open-water transit route can create significant safety, ecological and experiential effects in this setting.

The application's wake evidence is principally historic and does not assess the proposed South Fiord route, cumulative traffic, close-quarter interactions with small craft, or the effects of repeated large-vessel wake at landing places, beaches, river mouths and wildlife habitat. Its drone mitigation also does not adequately address low-level floatplane operations associated with Cruise Te Anau's Cruise & Fly product.

2. Cruise Te Anau and our direct interest

Cruise Te Anau is a Te Anau owner-operated business run by Erica and Chris. We operate commercially surveyed vessels on Lake Te Anau and have achieved Qualmark Silver within 12 months of taking over the business. Between us, our operational knowledge includes more than 45 years of boating and marine experience, energy sector compliance, monitoring and inspections, marine excellence, training, safety consultancy, environmental monitoring, DOC-approved guiding, Coastguard experience and search-and-rescue work in New Zealand and abroad

Our business is deliberately small-group, flexible and low impact. We operate from the Kepler Water Taxi Wharf and take visitors into South Fiord, approximately 10 minutes from the Te Anau lakefront. Our trips include:

- Flyby Explore (about 1 hour): a short small-group introduction to South Fiord for guests with limited time.
- Discovery Cruise (about 2 hours): South Fiord, mountain and bluff scenery, beaches and a guided native-forest walk to Hidden Lakes, an area reached by boat.
- Waterfall Adventure (about 3 hours): travel deeper into South Fiord, beach and waterfall experiences, and the short bush approach to Gorge Falls.
- Private and custom charters: photography, fishing, family and corporate trips, proposals, wilderness experiences and other itineraries planned around conditions and guest interests.
- Cruise & Fly: a combined boat and floatplane experience in which a seaplane collects guests in the South Fiord area for the onward flight.

Our passengers are often stationary or moving slowly in precisely the places that would be affected by a large passenger vessel entering South Fiord. Unlike a timetable-only operation, we adapt our route to weather, waterfalls, wildlife, other lake users and safe access on the day. We therefore have a direct operational, safety, environmental and commercial interest in the decision.

3. What the application seeks

The Real Journeys application seeks, among other matters:

- up to 12 return Glowworm Caves transfers per day (4,380 return trips per year), plus staff and vessel movements;
- up to 960 scenic and/or charter cruises per year from the Te Anau lakefront to anywhere within the specified front-country and northern backcountry settings, with the proposed route map extending into South Fiord, including landing on the hidden lakes jetty which will not support the high displacement and windage of the large ferry class vessels;
- a maximum party size of 99 passengers plus crew and staff (stated maximum party size 107);
- use of Luminosa, Fiordland Flyer, Fiordland Express, a Fiordlander-class vessel, a replacement vessel new to Lake Te Anau, and a further supplementary passenger vessel;

- filming and photography, including a DJI Air 3 or replacement/contractor/influencer drone, along the South Fiord scenic/charter route; and
- a 30-year term.

The application says scenic cruises may initially substitute when the caves or Milford Road are closed, but it also expressly seeks the ability to operate an additional vessel because RealNZ sees potential for a supplementary lake excursion. The decision must therefore assess the full authorised envelope, not only the applicant's present intention.

4. Navigation safety and wake effects

4.1 Maritime requirements are effects-based

Maritime New Zealand states that vessels must travel at a safe speed for the conditions, must not exceed five knots within 200 metres of shore or a structure and within 50 metres of another boat or a swimmer, and must always check the effect of their wake. A wake must not cause unnecessary danger to other boats or people. Maritime NZ also treats serious harm caused by exposure to a ship's wash (wake) as a notifiable maritime accident. These requirements matter in South Fiord because the hazard is not limited to shoreline erosion; it includes the immediate effect on people, small vessels, landing operations and passengers near the water.

Cruise Te Anau's operations place guests in small craft and at low-speed or stationary locations. A large catamaran wake can cause abrupt rolling, passengers losing balance, lines or equipment shifting, a vessel being pushed toward rocks or a beach, disruption to embarkation or disembarkation, and risk to people walking or standing at the water's edge. A skipper staying outside the numerical five-knot distances does not by itself answer whether the resulting wake is safe in the actual circumstances.

4.2 The application's wake evidence is not route-specific

The application relies on reports from 1989, 1997, 1999 and 2007. The Luminosa observations described in the application were made at Bluegum Point while the vessel was travelling about 24 knots and about 400–500 metres offshore. The application records wake events lasting about four minutes, with initial waves up to about 30 centimetres high. That evidence does not adequately model or observe:

- the narrower, enclosed geometry of South Fiord and reflections from steep shorelines;
- river mouths, beaches, shallow margins and landing locations used by people and wildlife;
- close-quarter encounters with Cruise Te Anau, Fiordland historic cruises, recreational boats, kayaks, fishing craft or floatplane operations;
- cumulative exposure from up to 960 scenic/charter trips per year in addition to other lake movements;
- different loading, displacement, hull form and operating speeds of any replacement or additional vessel; or
- the effect on a small craft that is stationary, landing, boarding or close to a waterfall or beach.

A condition requiring a new vessel's shoreline wake to be "comparable to or lesser than Luminosa" is not an adequate performance standard without an independently verified test method, route-specific thresholds, operating speeds, loading conditions, measurement locations and consequences for non-compliance.

4.3 Environmental effects of repeated wake

In South Fiord, repeated vessel wake may mobilise sediment, disturb shallow-water habitat, alter beach and river-mouth margins, affect water clarity locally, dislodge shoreline material and interact with natural wave action. Even if a historic study found no net erosion at a monitored open-lake beach, that does not establish that repeated large-vessel wake is ecologically insignificant at every South Fiord location. A precautionary, location-specific assessment is required before authorising the full scale sought.

5. Wildlife and habitat values

5.1 Whio / blue duck at the end of South Fiord

Whio have been observed by Cruise Te Anau at the end of South Fiord. DOC describes whio as an endemic river specialist that lives within river channels and nests along riverbanks, including under riverside vegetation and in log jams. DOC also notes that floods can destroy nests, reshape rivers, separate families and wash away food sources. This sensitivity makes the river–lake interface and adjacent margins particularly important when considering repeated wake, vessel approach, people going ashore, noise and drone filming.

The application’s incidental list of lake birds does not identify or assess the South Fiord whio observation. Before any expanded route is approved, DOC should verify current whio presence and seasonal use with its biodiversity staff, map avoidance areas and impose conditions that protect feeding, nesting and brood-rearing locations. Cruise Te Anau is willing to provide operational observations to assist that work.

5.2 Takahē near the McKenzie / Mackenzie River–Burn area

A takahē has been reported near the McKenzie (often written Mackenzie) River/Burn area. DOC’s published research provides independent evidence that this is plausible habitat: its study of long-term changes in takahē winter feeding grounds records fresh takahē sign collected from McKenzie Burn in winter 2000. DOC also states that the Murchison Mountains are the home of the largest wild takahē population (estimated at around 240 birds as at 2024), and asks that wild sightings be reported, including sightings outside the Special Takahē Area.

We do not ask DOC to treat a reported sighting as a confirmed current territory without verification. We do ask that it trigger a current biodiversity check before an expanded high-frequency vessel and drone authority is granted. DOC’s own field teams work to minimise disturbance because of the risk to breeding birds. Any concession should include mapped and seasonal buffers, a wildlife reporting protocol, immediate cessation requirements if protected wildlife shows disturbance, and the ability for DOC to vary or close routes in response to monitoring.

6. Drone use and the Cruise & Fly operation

6.1 Are drones legally able to be used?

Yes, but only subject to the required permissions and aviation rules. DOC states that drones are aircraft and that all aircraft operating on conservation land need a permit. The Civil Aviation Authority states that Part 101 applies to recreational and commercial drone users; operators must minimise hazards,

check airspace restrictions, obtain relevant consent, maintain the required visual operation, remain below 120 metres unless an exception applies, give way to all manned aircraft and land immediately if a manned aircraft approaches. Operations outside Part 101 require Part 102 certification. The Conservation Act 1987 concession regime also requires potential effects and proposed avoidance, remediation or mitigation to be assessed, and requires consistency with the relevant conservation management strategy or plan.

6.2 RealNZ's proposed mitigation is insufficient for South Fiord

The application proposes coordination with Te Anau-based aircraft operators and a drone height below 75 metres, reasoning that helicopters generally fly higher. This does not adequately assess floatplane operations. Cruise Te Anau's Cruise & Fly product involves a manned floatplane approaching, landing on and departing from the water in the South Fiord area. By definition, that aircraft must descend through low altitude and operate at water level. Terrain, wind, cloud, glare, radio coverage and the confined visual environment can all affect the arrival path and timing.

The legal duty for a drone to give way and land when a manned aircraft approaches is important but reactive. It does not justify overlapping planned operations or rely safely on the floatplane pilot detecting a small drone. A broad filming approval for RealNZ, its contractors and influencers over a long term also increases variability in pilot competence, equipment, communications and situational awareness.

6.3 Conditions required if drone activity is authorised

If DOC authorises any drone activity on the proposed route, Cruise Te Anau requests at minimum:

- no blanket 30-year operational approval; each filming event or tightly defined campaign should require prior written approval or notification under a DOC-controlled protocol;
- no drone launch, flight or recovery in South Fiord while a floatplane or other manned aircraft operation is planned, inbound, on the water or departing;
- direct pre-flight coordination with all known local aircraft and vessel operators, including Cruise Te Anau and the Cruise & Fly floatplane operator, using named contacts and positive confirmation rather than a general notice;
- a defined exclusion window before and after scheduled or notified floatplane activity, plus immediate landing on any unplanned manned-aircraft approach;
- compliance with the current Part 101/CATI 101-1 requirements or evidence of Part 102 authority where relevant, and all required airspace and property/administering-authority consents;
- no flight over non-consenting passengers, vessels or operators;
- wildlife buffers, seasonal no-fly areas and prohibition on following, circling or approaching wildlife;
- a flight log supplied to DOC on request, including date, time, route, pilot, aircraft, purpose, coordination undertaken and any wildlife or aviation interaction; and
- a clear complaints, incident and suspension mechanism.

7. Visitor experience, cumulative effects and fair use

South Fiord is not simply unused capacity on a large lake. Its value lies in quiet, scale and the feeling of entering genuine wilderness close to Te Anau. Cruise Te Anau has built its products around small groups, owner-skippers, low-volume access, flexibility and places that cannot be reached by road. Guests choose these trips specifically to avoid a large commercial cruise experience.

A vessel carrying up to 99 passengers, operating at the frequency sought, would change the visitor setting even if each transit were temporary. Effects include engine noise and wake, visual dominance, congestion at beaches or waterfalls, loss of solitude, conflict between large and small vessels, and displacement of an existing local operator whose product depends on the area's low-volume character. These effects should be assessed cumulatively, not treated as absorbed merely because boats already operate somewhere on Lake Te Anau.

The breadth of “anywhere” within the identified visitor zones, together with the ability to substitute vessels for 30 years, makes it difficult for other operators and the public to know what future use is actually being authorised. A concession should define routes, frequencies, vessel parameters, landing locations and operating conditions with enough precision to assess effects and enforce compliance.

8. Requested decision and conditions

Cruise Te Anau respectfully asks DOC to:

1. Approve continuation of RealNZ's established Te Ana-au Glowworm Caves passenger transfers and the wharf, maintenance and safety activities reasonably necessary for that core operation, subject to appropriate conditions.
2. Decline the proposed general authority for up to 960 scenic/charter cruises per year across the broad requested area, including South Fiord, unless and until a contemporary independent assessment has addressed route-specific wake, navigation, ecological, visitor-setting, aviation and cumulative effects.
3. Exclude South Fiord—or at minimum the sensitive end-of-fiord, Gorge Falls, McKenzie/Mackenzie River–Burn, Hidden Lakes and identified wildlife/landing areas—from the broad authority. Any later access should be considered through a specific, limited application with mapped routes and sites.
4. Set a substantially lower, staged trip cap and a smaller maximum vessel/party size for any scenic trial; require annual reporting and a formal review after the first season before any increase.
5. Require DOC biodiversity verification and monitoring for whio and takahē, mapped and seasonal avoidance areas, wildlife encounter reporting and adaptive closure powers.
6. Treat drone use as a distinct activity with short, event-specific or tightly bounded permissions. Apply the aviation, floatplane coordination and wildlife conditions requested in section 6.3.
7. Require an operational liaison protocol among RealNZ, Cruise Te Anau, floatplane operators and other regular commercial users, covering VHF channels, trip notifications, route conflicts, drone activity, incidents and complaints.
8. If a long concession term is granted for existing infrastructure, separate that term from any new scenic-cruise or drone authority. New activities should have shorter reviewable terms and clearly defined conditions.

9. Conclusion

Cruise Te Anau is not asking DOC to prevent RealNZ from continuing its established Glowworm Caves operation. We are asking DOC to distinguish that existing use from a major new scenic-cruise and filming entitlement. South Fiord's narrow waterways, quiet visitor setting, small-craft use, floatplane operations and sensitive wildlife require more than open-lake historic wake studies and general assurances.

The presence of whio at the end of South Fiord, the reported takahē near the McKenzie/Mackenzie area and DOC's own evidence of takahē use of McKenzie Burn reinforce the need for current field verification

and precautionary conditions. The proposed 30-year scale also means that uncertainty today could become a long-lived management problem. A specific, evidence-based and reviewable decision will better protect Fiordland National Park, lake users and the diversity of locally operated visitor experiences.

Cruise Te Anau welcomes the opportunity to meet with DOC, demonstrate the affected locations from the water and provide practical operational information about South Fiord, wildlife observations and Cruise & Fly procedures.

References

1. **Real Journeys Limited.** Application from Real Journeys Limited (uploaded concession application), particularly Form 4b – Watercraft, pp. 2–5 and 20–28; Form 5a – Filming, pp. 1–10; and drone application material. Accessed 22 August 2026.
2. **Maritime New Zealand.** Rules on the water – safe speed, five-knot distances and wake duties. [Source](#)
3. **Maritime New Zealand.** What must be notified – serious harm caused by exposure to ship wash (wake). [Source](#)
4. **Department of Conservation.** Blue duck/whio – habitat, nesting and flood sensitivity. [Source](#)
5. **Department of Conservation.** Establishing long-term changes in takahē winter feeding grounds in Fiordland (Science for Conservation 228), including fresh sign from McKenzie Burn. [Source](#)
6. **Department of Conservation.** Takahē – Murchison Mountains population, habitat and conservation context. [Source](#)
7. **Department of Conservation.** Visit a takahē – Murchison Mountains wild population information (including 2024 estimate). [Source](#)
8. **Department of Conservation.** Report takahē sightings – records of birds outside the Special Takahē Area and request to report sightings. [Source](#)
9. **Department of Conservation.** Drone use on conservation land – aircraft permit/concession requirements. [Source](#)
10. **Civil Aviation Authority of New Zealand.** Intro to Part 101 rules for unmanned aircraft – current operational requirements. [Source](#)
11. **Civil Aviation Authority of New Zealand.** Your drone questions answered – conservation land permission, manned-aircraft priority and operating constraints. [Source](#)
12. **New Zealand Legislation.** Conservation Act 1987, especially Part 3B (concessions), ss 17S, 17W and 17X. [Source](#)

Submission details

Submitted by Cruise Te Anau, Te Anau, Fiordland, New Zealand.

Owners/operators: Erica and Chris Musgrave

Contact details: info@cruiseteanau.co.nz

SUBMISSION ON CONCESSION APPLICATION

Real Journeys Limited – Lake Te Anau Jetties, Vessels and Cruise Activities

On behalf of Lake Te Anau residents and recreational users

To: Director General

Department of Conservation, Te Anau District Office (permissions@doc.govt.nz)

From: Peter Stewart, on behalf of the residents, ratepayers, and recreational users of Lake Te Anau who have used the lake for swimming, sailing, water-skiing, and fishing for over 60 years.

Re: Concession application by Real Journeys Limited for continued and expanded occupation of the Te Anau Lakefront Jetty and Te Ana-au Glowworm Caves wharf, an additional passenger vessel, expanded cruise routes across Lake Te Anau, and a 30-year term.

1. Who We Are and Why We Are Writing

We are long-standing local residents and recreational users of Lake Te Anau. For more than 60 years our families have swum, sailed, water-skied, and fished on this lake. Lake Te Anau is not simply a backdrop for a tourism business – it is the heart of the community that lives around it, used daily by locals for exactly the same reasons Real Journeys' founder once described so well.

“Today I am more convinced than ever before that conservation is the real cornerstone of New Zealand's tourism industry. Tourism and conservation need each other for mutual survival and the right direction to go is to take more notice of conservation issues, not less.”

– Les Hutchins, founder of Real Journeys, 1998

Les Hutchins built this business from Te Anau, on the understanding that tourism on this lake had to answer to conservation and to the community first. This submission asks the Department to hold his corporate successor, Real Journeys Limited (trading as RealNZ), to that same standard – because on our reading of this application, that standard has not been met.

2. What Real Journeys Is Actually Asking For

This is not a routine renewal. Having reviewed the application, the scale of what is being sought is substantial, and includes:

- A concession term of 30 years – locking in the terms of commercial access to a public lake for a generation, well beyond the tenure of any current council, community board, or DOC officer who might otherwise review it.
- Continued occupation and physical extension of both the Te Anau Lakefront Jetty and the Te Ana-au Glowworm Caves wharf, including extending at least six wharf piles along the outer edge of the Lakefront Jetty.
- Approval for an additional passenger vessel – beyond the existing “Luminosa”, “Fiordland Flyer” and “Fiordland Express” – to run scenic and charter cruises “to anywhere within Lake Te Anau”, including the South Fiord and northern backcountry zones.
- Up to 960 scenic/charter cruise trips per year, plus up to 230 vessel-transfer trips per year, plus up to roughly 4,380 return passenger transfer trips per year between the Lakefront Jetty and the Caves wharf – a near-continuous volume of commercial vessel movement on the lake.
- An explicit statement that RealNZ “believes there is potential to operate an additional vessel” and, more broadly, flags further expansion of Te Anau-based visitor activity during the life of the concession.

Individually, some of these may be modest. Taken together, over a 30-year term, they represent a dramatic and largely irreversible increase in commercial access to, and use of, a lake that the wider community also relies on and loves.

3. This Scale of Change Has Not Been Shared With the People Who Use the Lake

We note the application itself acknowledges that a concession term exceeding 10 years must be publicly notified. That is welcome, but it is a statutory minimum, triggered only because RealNZ chose to seek 30 years rather than a shorter term. It is not the same thing as genuine community engagement.

Before this application was lodged, there was no meaningful attempt to share these proposed changes with the people who actually use Lake Te Anau day to day: the Marakura Yacht Club and its sailing regatta community, the Te Anau-Manapouri Fishing Classic organisers and recreational anglers, water-skiers, swimmers, kayakers, paddle boarders, and the boat harbour users who launch from the lakefront every summer. A 123-page technical application, describing a 30-year commercial arrangement, should not be the first time this community learns the scale of what is proposed. We ask that the Department treat this absence of prior engagement as directly relevant to how this application is now processed.

4. Effects on Lake Users That Must Be Properly Assessed

We ask DOC to ensure the following effects on recreational lake users — not just on Real Journeys' own operations — are independently and thoroughly assessed before any decision is made:

- Cumulative vessel traffic: the combined effect of near-daily scenic cruises, passenger transfers, staff and tender transfers, and vessel relocations, layered on top of existing recreational boating, sailing, and water-skiing, particularly during the busy summer months when both commercial and recreational lake use peaks.
- Wake and safety near swimmers and sailors: the application itself refers to a 50-metre buffer from a person swimming and to changes near Deadman's Point, close to the sailing line used by the Marakura Yacht Club. Any increase in vessel numbers, size, or route range through these areas needs assessment specific to swimmer and small-craft safety, not just to shoreline erosion.
- Permanent infrastructure growth: extending wharf piles and jetty structures at the town's main lakefront — described in the application as “an invaluable asset to the town” for recreation — increases the permanent commercial footprint on a foreshore locals also use for launching, swimming, and gathering.
- Expanded cruise range: extending scenic and charter cruises into the South Fiord and northern backcountry zones brings commercial vessel traffic into areas currently used by locals for quieter recreation and fishing, and this expansion deserves the same scrutiny as the jetty infrastructure itself.
- Precedent for further growth: the application flags a further “additional vessel” and further Te Anau-based visitor activity as likely during the term. A 30-year concession should not become an open door to incremental expansion without the community being consulted again at each step.

5. What We Are Asking the Department to Do

- Provide a genuine, well-publicised opportunity — beyond the statutory minimum — for lake residents, ratepayers, the yacht club, angling groups, and other recreational users to review the full application, including all technical reports (e.g. wake assessments), and to make submissions.
- Allow adequate time to do so, given the size and technical complexity of this application (123 pages across multiple concession forms) and the fact that affected local groups were not briefed on it before lodgement.
- Commission or require independent assessment of the cumulative effects on recreational lake users specifically — swimmers, sailors, water-skiers, kayakers and anglers — rather than relying solely on the applicant's own effects assessment.

- Reconsider whether a 30-year term is appropriate at all, or whether a materially shorter, periodically reviewable term would better protect the community's ability to have a say as circumstances change.
- Require that any further expansion flagged in this application (the additional vessel, additional attractions, extended cruise routes) be subject to its own distinct, publicly notified process – not folded into this concession as an open-ended allowance.

6. Closing

Real Journeys grew out of a family business built on the belief that tourism must answer to conservation, and – we would add – to the community that conservation is meant to serve. We are not opposed to Real Journeys operating on Lake Te Anau; it has done so successfully for decades, and we recognise the jobs and economic contribution it brings to Te Anau. What we are asking for is proportionate: that a proposal of this scale and duration be shared openly with the people who live beside and use this lake, before it is locked in for the next 30 years.

“Tourism and conservation need each other for mutual survival and the right direction to go is to take more notice of conservation issues, not less.”

– Les Hutchins, 1998

We ask the Department of Conservation to hold this application to that same standard, and to ensure that the people of Te Anau who use this lake are given a genuine seat at the table before any decision is made.

Respectfully submitted,

Peter Stewart

On behalf of Lake Te Anau residents and recreational lake users



Submission 5

From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 10:30:39 am

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Laura Grigg
Contact person : As above
Email : [REDACTED]
Alternative contact :
Phone/Mobile :
New form element : [REDACTED]
Keep my contact details confidential : Yes
Name of submitter : Laura Grigg
Organisation :
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : Term of concession. Size of concession . Negative impact on other lake users
Reasons : 30 years is too long The scope of what is proposed is too large and vague Large boats operating have already had a negative impact on other lake users. Large wake makes it not safe for tamariki to be on the water while their current vessels are going up and down the lake. The sound pollution is offensive from engine noise to the noise of the commentary
Outcomes : 10 year term would be more palatable. Limits on size of vessel, engine size, db produced
File upload :

Do not reply to this email. This email was generated by the DOC website. Address any replies to the submitter's email listed above.

From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 10:36:17 am

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Carl McNeil
Contact person : Carl McNeil
Email : [REDACTED]
Alternative contact :
Phone/Mobile : [REDACTED]
New form element : c/o [REDACTED]
Keep my contact details confidential : Yes
Name of submitter : Carl McNeil
Organisation :
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : Continued occupation and physical extension of both the Te Anau Lakefront Jetty and the Te Ana-au Glowworm Caves wharf, including extending at least six wharf piles along the outer edge of the Lakefront Jetty. • Approval for an additional passenger vessel — beyond the existing “Luminosa”, “Fiordland Flyer” and “Fiordland Express” — to run scenic and charter cruises “to anywhere within Lake Te Anau”, including the South Fiord and northern backcountry zones. • Up to 960 scenic/charter cruise trips per year, plus up to 230 vessel-transfer trips per year, plus up to roughly 4,380 return passenger transfer trips per year between the Lakefront Jetty and the Caves wharf — a near-continuous volume of commercial vessel movement on the lake. • An explicit statement that RealNZ “believes there is potential to operate an additional vessel” and, more broadly, flags further expansion of Te Anau-based visitor activity during the life of the concession.
Reasons : Keeping in mid that this proposal impacts Fiordland National Park, the broader community and ALL users: The cumulative vessel traffic: the combined effect of near-daily scenic cruises, passenger transfers, staff and tender transfers, and vessel relocations, layered on top of existing recreational boating, sailing, and water-skiing, particularly during the busy summer months when both commercial and recreational lake use peaks. Wake and safety near swimmers and sailors: the application itself refers to a 50-metre buffer from a person swimming and to changes near Deadman's Point, close to the sailing line used by the Marakura Yacht Club. Any increase in vessel numbers, size, or route range through these areas needs assessment specific to swimmer and small-craft safety, not just to shoreline erosion. Permanent infrastructure growth: extending wharf piles and jetty structures at the town's main lakefront — described in the application as “an invaluable asset to the town” for recreation — increases the permanent commercial footprint on a foreshore locals also use for launching, swimming, and gathering. Expanded cruise range: extending scenic and charter cruises into the South Fiord and northern backcountry zones brings commercial vessel traffic into areas currently used by locals for quieter recreation and fishing, and this expansion deserves the same scrutiny as the jetty infrastructure itself.
Outcomes : That increased commercial activity within a National Park be declined
File upload :

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Submission 7

From: [REDACTED]
To: [DNSubmissions](#)
Subject: 126048-WAT: Real Journeys Ltd
Date: Friday, 4 September 2026 10:36:28 am

You don't often get email from [REDACTED] [Learn why this is important](#)

Kia ora,

The deadline on this submission needs to be extended and the details need to be clearly laid out for local lake users to have a say.

Submission 8

From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 10:43:38 am

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Renee Patino
Contact person : Renee Patino
Email : [REDACTED]
Alternative contact :
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential : Yes
Name of submitter : Renee Patino
Organisation :
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : No community engagement Increased safety risk to recreational lake users
Loss of community use due to increased commercial infrastructure. Length of application
Reasons : Approval of this application will have a huge impact on community use of the lake. Currently our family enjoys water sports, fishing, kayaking and spending time in the peace offered by the lake. Introducing commercial use at this level changes the whole nature of the lake. It is already problematic with the glow worm boat needing to be dodged by recreational users. I fear when my kids fall off the kneeboard that another boat, especially a large commercial boat won't see them in time. Increased commercial activity on the lake will dramatically increase the risk to the safety of recreational users. Even just the wake from the glow worm boat can cause havoc for small children who thought they were safely playing in the pontoon area - the waves make the whole area unsafe. The lake, especially the arms, should remain non-commercial, its not fair to take away the natural peace, its the whole reason we live here. You will drive away locals.
Outcomes : There needs to be no increase to commercial activity on the lake. It's not safe! The number of commercial boats will vastly affect recreational use of the lake, and this is why we live here! There shouldn't be any change to the town foreshore for additional commercial activity without vast community consultation. The length of the term (30 years) is ridiculous, we have no idea if this will be suitable for our town so far down the track.
File upload :

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Submission 9

From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 10:46:22 am

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : William Ferris
Contact person : N/A
Email : [REDACTED]
Alternative contact :
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential : Yes
Name of submitter :
Organisation :
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : Wake damage/nuisance/risk. Particularly increased traffic and in "Back country" cruises..
Reasons : The wakes produced by Real NZs current fleet may look small, but are an absolute menace to most lake users. Particularly small watercraft and children.
Outcomes : Number of allowed trips to back country areas should be limited further, on a daily basis. This could easily ruin a lot of users experiences on the lake, particularly summer holidays, having large vessels constantly moving through the "back country". There are thousands of people using these waterways during the nicer weather, which coincides with more visitors allowing Real NZ to potentially fill multiple cruises on the very few nice days many people spend in these waters. An example of an issue the wakes can cause occurred on the 1/1/26. In extremely lucky circumstances, I noticed a dinghy with an older man and 3 children approximately 250m off shore had disappeared after wakes from the MV Titiroa passed on Lake Manapouri. I was able to locate and assist the occupants. On an otherwise fine day these wakes had compromised the small boats freeboard and it capsized.
File upload :

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4 September 2026

Director General,
Department of Conservation,
Te Anau District Office
Email: DNSubmissions@doc.govt.nz

To Whom It May Concern,

Re: Concession application by Real Journeys Limited for continued and expanded occupation of Lake Te Anau infrastructure, an additional passenger vessel, expanded cruise activities and a 30-year concession term.

I am submitting on the application by Real Journeys Limited (RealNZ) relating to its commercial activities on Lake Te Anau.

I am not opposed to commercial tourism activity on Lake Te Anau. RealNZ has operated successfully in the area for many years and tourism makes an important contribution to the local economy, however, the application represents a significant expansion and long-term commitment to commercial use of a publicly accessible lake and its foreshore. In my view, the scale, duration and potential future expansion of the concession warrant considerably greater scrutiny than a routine concession renewal.

Scale of proposed commercial use

The application seeks substantially more than simply continuing existing operations. It includes:

- a 30-year concession term;
- continued occupation and extension of the Te Anau Lakefront Jetty;
- continued occupation and extension of the Te Ana-au Glowworm Caves wharf;
- additional wharf piles along the outer edge of the Lakefront Jetty;
- an additional passenger vessel;
- scenic and charter cruises to locations across Lake Te Anau, including the South Fiord and northern areas;
- up to approximately 960 scenic/charter cruise trips per year;
- up to approximately 230 vessel-transfer trips per year; and
- up to approximately 4,380 return passenger transfer trips per year between the Lakefront Jetty and the Caves wharf.

Taken together, these activities represent a substantial commercial use of Lake Te Anau.

The Department should therefore assess the proposal as an expansion of commercial use of a public natural resource, rather than simply as a continuation of an existing business operation.

A 30-Year term requires particular scrutiny

I strongly oppose a 30-year concession. A significantly shorter term, with meaningful periodic reviews, would allow DOC to reassess whether the scale of commercial activity and its environmental, recreational and community effects remain acceptable. In my view, a concession term of 10 years, with periodic review provisions, would provide reasonable commercial certainty while preserving DOC's ability to reassess the appropriateness of the concession.

The justification provided by RealNZ for the proposed 30-year term is inadequate. The application states that a long term is needed to support possible future investment in replacement electric, hybrid or hydrogen-powered vessels and in upgrades to associated wharves, the lakefront mooring and Tawera Slip. However, it provides no evidence demonstrating why those investments require a 30-year concession rather than a shorter term with renewal rights and meaningful review points.

In particular, the application does not identify the likely scale or timing of the proposed investment, expected asset lives, capital expenditure, financing requirements, payback periods or any other information that would allow DOC or the public to assess whether a 30-year term is necessary. Its reasoning amounts to an assertion that RealNZ wants sufficient time to obtain a return on investments that may be made at some point in the future.

More fundamentally, the proposed investments are expressed only as possibilities. The application does not commit RealNZ to purchasing a lower-emission vessel, undertaking any specified infrastructure upgrade, invest a minimum amount, or complete any investment by a particular date as a condition of receiving the 30-year term. RealNZ could therefore obtain the benefit of a 30-year concession without making the investments relied on to justify it. Any longer term linked to future investment should be conditional on clear, enforceable investment commitments, milestones and review rights, with consequences if those commitments are not met.

Commercial certainty may be desirable for the applicant, but it does not establish that granting extensive commercial rights over a public natural resource for three decades is necessary or appropriate. In the absence of supporting evidence, the proposed term appears to be based on commercial preference rather than demonstrated need. DOC should require a properly evidenced business case before considering a term of this length. If a shorter term would genuinely prevent the proposed investments from proceeding, the applicant should provide evidence demonstrating this.

Over 30 years, recreational use, tourism demand, vessel technology, environmental conditions, community expectations and the management of Fiordland National Park may change substantially.

A concession of this duration could effectively establish a long-term commercial entitlement to occupy and use parts of the lake and lakefront while limiting the ability of future decision-makers to respond to changing circumstances.

If DOC nevertheless considers a longer-term concession appropriate, it should grant no more than the minimum term justified by evidence and include meaningful periodic reviews, enforceable limits on future expansion, and an ability to revisit the concession conditions and financial return if the scale or nature of the operation changes.

Effects on recreational lake users

Lake Te Anau is a shared resource. Commercial operators and recreational users need to be able to coexist safely and reasonably.

The application should therefore be assessed for its effects on the full range of recreational users.

Cumulative vessel traffic

The assessment should consider the cumulative effect of all proposed commercial movements rather than considering each category of vessel movement in isolation.

This includes scenic cruises, charter trips, passenger transfers, vessel relocations and other commercial movements.

The relevant question is not simply whether an individual additional trip has a minor effect. It is whether the total volume and frequency of commercial vessel activity will materially change the character, safety and usability of the lake for recreational users, particularly during peak summer periods.

Permanent infrastructure

The proposed extension of the Lakefront Jetty represents a further permanent commercial occupation of the lakefront which I do not support.

If DOC considers the extension appropriate, RealNZ should pay commercially appropriate rates for the access and use granted, including occupation and use of the jetty and associated infrastructure. The return should reflect the value, extent, frequency and duration of the rights granted, including any expansion under the concession and not be 'peppercorn' in nature.

Expansion into other areas of Lake Te Anau

The proposal to allow scenic and charter cruises to operate across Lake Te Anau, including the South Fiord and northern backcountry areas, is significant and one that I strongly oppose.

I do not own a boat and have no practical means of accessing these remote parts of the lake. Nevertheless, I strongly support keeping them as pristine, quiet and undeveloped as possible, preserving their natural character for future generations and maintaining conditions that reflect, as closely as practicable, the way these areas existed hundreds of years ago.

RealNZ already has extensive commercial access to and use of Lake Te Anau. In my view, the South Fiord and northern backcountry areas are different in character from the existing core operating areas associated with the Glowworm Caves and Te Anau township. These areas should be protected rather than regarded as an opportunity for further commercial expansion.

Once commercial cruise operations become established in relatively undeveloped areas, it can become increasingly difficult to resist future increases in vessel numbers, frequency, capacity or operating areas. DOC should therefore consider not only the immediate effects of the proposal but also the precedent that would be created by authorising regular commercial cruise activity in these parts of the lake.

A 30-year concession combined with authority to operate in the South Fiord creates the potential for commercial use to become normalised in areas that have historically remained relatively free from such activity. That is a significant change and should not be authorised without compelling justification.

I am particularly concerned that the application seeks authority through broad operational wording rather than clearly defined and tightly constrained activities. If DOC is minded to authorise any activity in these areas, the locations, frequency, vessel numbers and nature of the permitted activity should be precisely defined and should not provide scope for future expansion without further public consultation and assessment.

Appropriate financial return for commercial use of a public resource

A further matter that I ask DOC to consider carefully is the financial return payable by RealNZ for the occupation and commercial use of Lake Te Anau and its associated public infrastructure and natural environment.

RealNZ derives commercial revenue from operating passenger and charter services on the lake. The application seeks to increase the extent and frequency of that commercial use and to secure access for a period of up to 30 years.

The public should receive an appropriate return where a commercial operator is granted an exclusive or preferential right to occupy infrastructure and conduct substantial commercial activity within a public natural resource.

The proposed lease or concession terms have not been provided. Without those terms, it is difficult for the public to assess the trade-off between the extent, duration and exclusivity of

the commercial access being granted over public areas and the financial return, safeguards and public benefits DOC proposes to secure in exchange.

Accordingly, any concession fee should properly reflect:

- the extent of the lake and lakefront occupied;
- the scale and frequency of commercial vessel movements;
- the number and capacity of vessels;
- the commercial value of the operating rights being granted;
- the duration of the concession;
- the use of permanent infrastructure;
- any preferential access provided to the operator; and
- the additional rights and activities being sought under this application.

If the proposed concession represents a material increase in RealNZ's access to and commercial use of Lake Te Anau, the financial consideration should increase accordingly.

The Department should also consider whether the proposed concession arrangements provide an appropriate return to the public over the full 30-year period, rather than simply establishing a fee based on historic levels of activity.

In my view, greater commercial access and use should result in a proportionate increase in the financial return to the public.

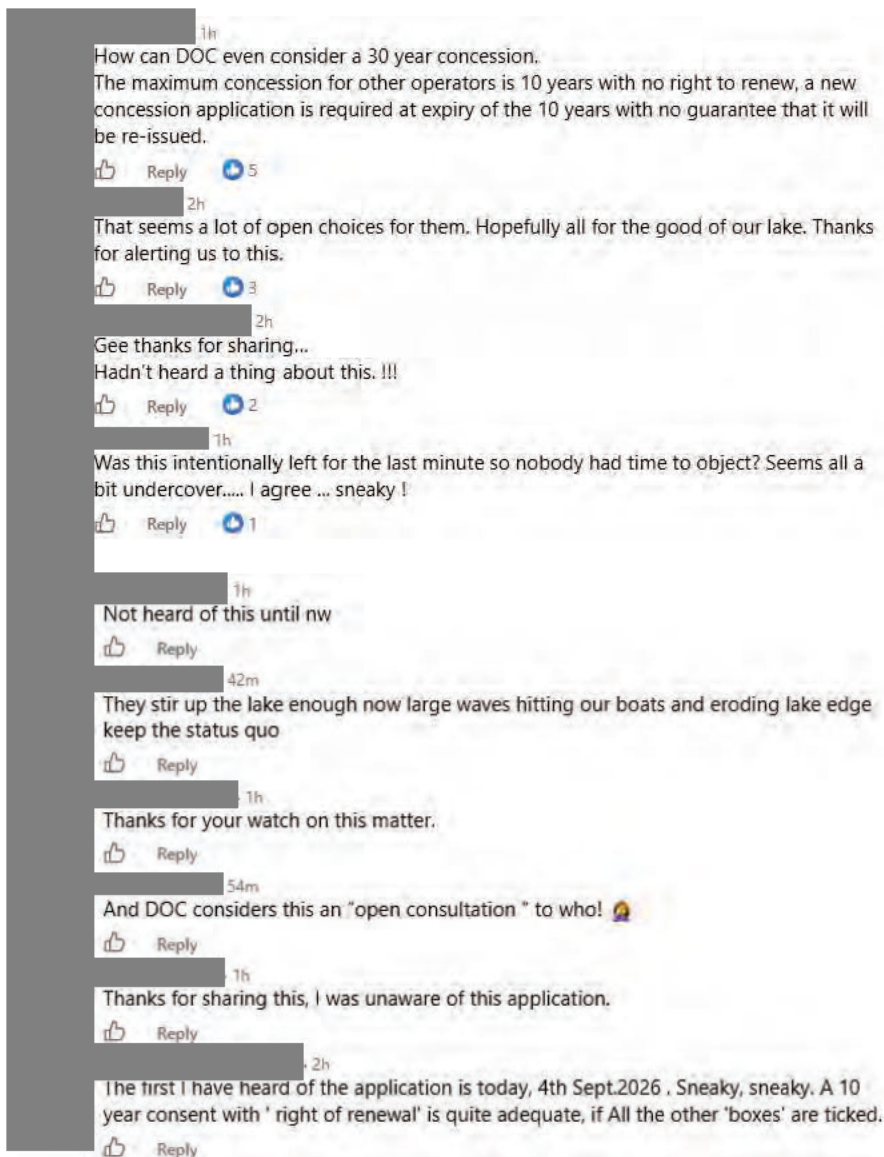
Meaningful public consultation has not occurred – the community should have been proactively informed

The scale and significance of the proposed changes make meaningful public consultation essential. In my view, that standard has not been met.

The application proposes additional vessel capacity, increased movements, wider operating areas, permanent lakefront infrastructure changes and a concession of up to 30 years. These are significant changes, not merely a continuation of existing activities.

I am also concerned that the proposal was described publicly as the continuation of passenger transfer and cruise activities on Lake Te Anau. Having reviewed the application, I do not consider that description accurately reflects the scope of what is being sought. The application includes additional vessel capacity, increased activity, expanded operating areas, additional infrastructure and a 30-year concession term. These matters go well beyond a routine continuation of existing operations and should have been clearly communicated to the public from the outset.

The limited awareness of this consultation within the local community is concerning. Comments from members of the Te Anau community, including those shown below from the Te Anau community Facebook page, indicate that other members of the public were unaware of the consultation.



This is a forum that DOC could reasonably have used, alongside other appropriate channels, to proactively advise the local community that a consultation of this significance was underway.

For a proposal involving a potential 30-year commercial concession and a material expansion of commercial activity on Lake Te Anau, DOC should not rely solely on a passive approach to notification and expect the affected community to discover and navigate the process themselves.

Consultation should be meaningful, not merely procedural

I acknowledge that DOC may have complied with the minimum statutory requirements for notifying the application. However, meeting a minimum notification requirement is not the same as conducting meaningful consultation.

Meaningful consultation requires that affected people have sufficient information, sufficient time and a genuine opportunity to understand the proposal and provide an informed response. That has not occurred here.

The combination of a short summary, the technical nature and breadth of the application, the proposed 30-year term, and the lack of proactive communication with the wider lake-user community significantly restricted meaningful participation.

Given this context, I request the following:

- extend the consultation period to allow the community adequate time to properly understand and consider the proposal;
- proactively publicise the extended consultation through appropriate local channels, including community noticeboards, local organisations and relevant community forums;
- provide the proposed lease or concession terms so the public can assess whether the extent, duration and exclusivity of the commercial access granted over public areas is appropriately balanced by the financial return, safeguards and public benefits secured in exchange;
- provide access to all relevant supporting and technical assessments, including assessments of vessel traffic, wake, safety, infrastructure and recreational impacts;
- provide a plain-language explanation of the full scope of the commercial rights sought, the principal changes from existing operations, and the evidence relied on to justify a 30-year term;
- allow a further reasonable opportunity for submissions after the full scope of the application and the proposed concession conditions have been clearly communicated; and
- ensure that submissions received are genuinely considered before any decision is made.

The proposed 30-year term makes these matters particularly important. A decision made now could affect access, recreational use, commercial activity and the character of Lake Te Anau for an entire generation.

This is too significant a change to be dealt with through a minimal or purely procedural consultation process. The community deserves the opportunity to understand what is being proposed before these rights are potentially granted for 30 years.

I also wish to record that I support the submission made by Peter Stewart on behalf of Lake Te Anau residents and recreational lake users, and my submission should be read alongside his submission.

Summary

In addition to my request regarding further public consultation, I ask the Department of Conservation to carefully consider:

- the cumulative impact of increased commercial vessel activity on recreational users;
- the expansion of permanent commercial infrastructure on the lakefront;

- the proposed 30-year term and whether it has been adequately justified;
- the fact that the future investments relied upon to support the 30-year term are not mandatory commitments and may never occur;
- the potential for further commercial expansion during the concession term, particularly in relation to vessel numbers, operating areas and infrastructure;
- the expansion of commercial activity into the South Fiord and northern backcountry areas and its implications for remoteness, tranquillity and wilderness values;
- the precedent that may be set by granting commercial operating rights in areas that have historically experienced relatively low levels of commercial activity;
- the extent of any exclusive or preferential commercial access being granted over public infrastructure and public space; and
- an appropriate, commercially based financial return for the increased occupation and use of this public resource.

For the reasons outlined above, I respectfully submit that the application should not be approved in its current form. In particular, I do not support the proposed 30-year concession term or the expansion of commercial activity into the South Fiord and northern backcountry areas.

Helen Keir

Submission 11

From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 11:08:03 am

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Scott Darnill
Contact person : Scott Darnill
Email : [REDACTED]
Alternative contact :
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential : Yes
Name of submitter : Scott Darnill
Organisation :
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : Expansion of current jetty and unlimited use of Lake Te Anau fir a 30 year term
Reasons : 30 years is too long for this type of operation.
Outcomes : If RealNZ wish to operate a environmentally friendly operation then leases of 5 yer terms appears to be more practical. This RealNZ will ensure they operate correctly and environmentally. The longer term can create issues in the future.
File upload :

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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 11:13:52 am

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Wendy Holder
Contact person : Wendy
Email : [REDACTED]
Alternative contact : [REDACTED]
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential : Yes
Name of submitter : Wendy Holder
Organisation :
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do wish to be heard in support of this objection or submission at a hearing
Specific parts : The expansion of cruises to other parts of Lake Te Anau, expanded jetties, and infrastructures on the edge of the lake and within the lake.
Reasons : Real NZ owns and operates many tourist attractions within Southland and Otago currently. From ski fields, Fiord cruises, Wakatipu cruises, and the Glow worm caves access. I do not see this application as a need for financial, and employee, necessity to keep the the business running. However, the main reason is to keep Te Anau and lake Te Anau as the wild and natural space it is, and not just become a venture for bus loads of tourists to jump off a bus, or boat. There is no debate regarding the loss of natural beauty and serenity that has already happened in Milford sound, and becoming more so in Doubtful sound. Watching hundreds of people on five or six cruise boats going up and down Milford sound, has destroyed a big part of its beauty. Already we see the similar destruction begining in Doubtful Sound, and with already multiple trips a day to the glow worm caves, any more cruises, especially throughout the lake will destroy Te Anau as an adventurers access to raw natural NZ. The Lake front area seems to be up for grabs over and over. No! to any further development on the lake edge or front of Lake Te Anau. If you do not value wilderness, quiet, serenity, and nature adventures then take a look at Wanaka and Queenstown, there is plenty of commercial action over there. I appreciate Real NZ began in Te Anau by a local family, but I don't think there are many in Te Anau or Southland who would see this further commercial growth as a positive. The love of money is the root of all evil. It is right to allow access to the public and tourist to the beauty that surrounds us, but Te Anau and the lake are valued for there natural beauty, great walks, quiet serenity. To become another Wanaka or Queenstown would destroy the reason people live in and venture to Te Anau.
Outcomes : I have no problems with Real NZ continuing the established tourism opportunities they have in the Te Anau area, and the furthering of that part of this application. However there is no need to extend this, at the detriment of our natural environment, quiet, and serenity. Opportunity to change the nature of Te Anau will do us and all adventurers a disservice, also the wild life, and infrastructure will be at risk.
Remove all, parts around expansion of the existing business into further areas of Fiordland.
File upload :

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-----Original Message-----

From: [REDACTED]
Sent: Friday, 4 September 2026 11:41 am
To: permissions <permissions@doc.govt.nz>
Subject: SUBMISSION ON CONCESSION APPLICATION

[You don't often get email from [REDACTED] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification>]

Real Journeys Limited – Lake Te Anau Jetties, Vessels and Cruise Activities

To: Director General, Department of Conservation, Te Anau District Office

From: Anna Simmonds, [REDACTED]

Re: Concession application by Real Journeys Limited — Te Anau Lakefront Jetty and Caves wharf, additional vessel, expanded routes, 30-year term.

I'm a lake user, not a lobby group — I swim, boat and fish on Lake Te Anau, and I'm writing on my own account to add an independent voice to what's already been raised about this application, because I have concerns around the democratic process surrounding this application.

What strikes me most isn't any single item in the application — it's the term. Thirty years is longer than most of the people who'll actually make this decision will be in their jobs. Once it's signed, there's no natural point where the community gets asked again, no matter how the numbers grow in the meantime. RealNZ itself flags in the application that it expects to want more — another vessel, more Te Anau-based activity — during the life of the concession. That tells me the 30-year term isn't just about certainty for the operator, it's about avoiding future scrutiny. I don't think DOC should grant that without a much harder look.

The second thing I want on record is what a 30-year lock-in does to accountability for effects that are hard to measure in a single report — cumulative wake and boat traffic at summer peak, when recreational and commercial use are both at their busiest, and the safety margin for swimmers and small craft near known pinch points like Deadman's Point. Those are the kind of effects that get assessed once, at the start, and then stop being anyone's responsibility for three decades. If DOC is going to grant a term this long, it needs to be tied to periodic review, not a one-off assessment that has to hold for a generation.

I ask the Department to:

- Treat the 30-year term as the central question of this application, not a formality — and seriously consider a shorter, periodically reviewable term instead.
- Require independent, not applicant-supplied, assessment of cumulative vessel traffic and swimmer/small-craft safety at peak season.

- Make sure any further vessel or activity expansion RealNZ has flagged goes through its own separate notified process later, rather than being pre-approved inside this one.
- Give lake users real time and visibility into the technical reports before submissions close — this wasn't shared with the people who use the lake before it was lodged.

Real Journeys has operated here successfully for decades and I've got no issue with that continuing. My concern is narrower: that a decision this size, for this long, shouldn't be made without a mechanism for the community to be heard again as things change — not just once, now.

Anna Simmonds



“The nation that destroys its soil destroys itself.” Franklin D. Roosevelt

From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 11:42:37 am

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Carolyn Henshaw

Contact person : Carolyn Henshaw

Email : [REDACTED]

Alternative contact :

Phone/Mobile : [REDACTED]

New form element :

Keep my contact details confidential :

Name of submitter : Carolyn Henshaw

Organisation :

Support oppose or neutral : I Oppose this Application (I am making an objection)

Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.

Specific parts : The amount of extra traffic that will be on the Lake, especially in the quieter res where people fish and escape from the busier parts. The extended jetty at the main lakefront where people launch boats and swim. It will take up a large area.

Reasons : There is enough tourism now. Why spoil why people come to this area. The increase in tourist boat traffic will spoil the beauty of the Lake.

Outcomes : Do t allow this to go through. Greed is not always good.

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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 11:53:21 am

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Tom Clayton
Contact person : Tom Clayton
Email : [REDACTED]
Alternative contact :
Phone/Mobile :
New form element :
Keep my contact details confidential : Yes
Name of submitter :
Organisation :
Support oppose or neutral : I Support this Application (I am making a submission)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts :
Reasons :
Outcomes :
File upload :

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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 12:20:17 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Michael Dodd
Contact person : Michael Dodd
Email : [REDACTED]
Alternative contact :
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential : Yes
Name of submitter :
Organisation :
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : The 30 year time frame what is wrong with their 10 year time frame and why is this the first thing most residents of Te Anau has heard of this very sneaky releasing it on the last day of submissions
Reasons : My reasons are 30 years is to long it effects all other lake users and residents of Te Anau
Outcomes :
File upload :

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From: [Jess Henwood](#)
To: [DNSubmissions](#)
Subject: 126048-WAT Real Journeys Ltd
Date: Friday, 4 September 2026 12:22:46 pm

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Hi there

Below is our submission against the application for Real Journeys consent

Over the past 10 years of owning boats and regularly using the lake, we have had numerous encounters with the glowworm cave boat. On every occasion, its wake has significantly interrupted our time on the lake.

Fortunately, after years of experience, we now know how to anticipate and deal with the bow waves created by the vessel. However, there have been occasions when the waves have been as large as the side wells of our boat, and we have genuinely felt that we were not far from capsizing. We were fortunate to be experienced boat users and prepared to deal with the conditions.

Our concern is not simply about inconvenience or the enjoyment of recreational boating. It is about the safety implications of having larger and faster commercial vessels operating in more remote areas of the lake, particularly when there may be smaller or unattended boats in those areas.

We understand that the company purchased the catamaran with the intention of reducing the wake and minimising its impact on other lake users. However, our experience has been that the vessel now travels at a greater speed, and as a result, the wake it creates can still be just as significant for other boats and lake users.

The company needs to be much more aware of where other people are using the lake and where boats are being left on the beaches, particularly at popular locations such as Honeymoon Beach, the Dome Islands, Moonlight Beach and Garden Point.

A particular concern is boats that have been pulled up and parked on the beach while their owners are away. These boats are often completely unattended, meaning there is nobody there to see a large wake approaching, move the boat, adjust its position or protect it from being damaged. A large wake hitting a boat sitting on or near the shoreline can cause it to move, drag its anchor, be thrown around on the beach or sustain damage.

We believe there should be clear rules and operating procedures requiring commercial vessels to slow down well before reaching these areas and to minimise their wake when approaching beaches where boats are known to be parked or anchored. This should not just apply to passing boats with people on board — particular consideration needs to be given to unattended boats where the owner has no opportunity to respond to the wake.

People should be able to leave their boat safely parked on a beach while they walk, camp, fish or explore without having to worry that a commercial vessel travelling past at speed is going to send a large wake into the shoreline and potentially damage it.

We are not opposed to tourism or commercial operators using the lake. We simply believe that commercial operators have a responsibility to be aware of the impact their vessels and speed have on everyone else using the lake, including people who are not necessarily visible from the water.

With increasing commercial activity and more boats operating in remote areas of the lake, we believe proper speed and wake-management rules are necessary to protect other lake users and their boats.

Thanks for taking your time to read our submission

Kind regards

Ethan and Jess Henwood



[Yahoo Mail: Search, organise, conquer](#)

From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 12:28:04 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Withheld due to fear of retaliation.

Contact person : Withheld due to fear of retaliation.

Email :

Alternative contact :

Phone/Mobile :

New form element :

Keep my contact details confidential : Yes

Name of submitter :

Organisation :

Support oppose or neutral : I am Neutral on this Application (I am making a submission)

Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.

Specific parts : Scenic cruises / charters outside of existing operations as an expansion to current Lake Te Anau activities.

Reasons : These activities are already catered for by existing operator's namely Cruise Te Anau and Fiordland Historic Cruises. These operations provide authentic, small scale activities that meet true low impact values and high visitor quality of experience. While I feel new, unique and diversified Lake Te Anau water use activity should be considered, the application appears to misrepresent or ignore that such access and small scale activity is already catered for by small scale owner / operators personally invested in delivering the extended scope of activity sought, namely private charters, extended scenic cruising and hidden lakes walks. Considering the applicants vast exclusive use already existing of Lake Te Anau and associated land based activity, I feel that this expansion of activity request approaches a threshold of full location - single company dominance intent.

Outcomes : Why existing operations are not enough. Acknowledging that other local companies already provide the expanded scope of activity sought. The impacts of mass tourism / mass people movement within the National Park - namely hidden Lakes walks, is not adverse to the wilderness values of visitors already catered to by existing companies operating guided activity at this location.

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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 12:58:28 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Ebel Kremer
Contact person : Ebel Kremer
Email : [REDACTED]
Alternative contact :
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential : Yes
Name of submitter : Ebel Kremer
Organisation : Private resident living in [REDACTED]
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do wish to be heard in support of this objection or submission at a hearing
Specific parts : Objection to application to go anywhere on lake Te Anau. Support ability to be able to travel up the south arm but no further.
Reasons : Intrusion of commercially vessels traveling all over the lake becomes intrusive to the environment, visual pollution , noise pollution, shore line damage. The lake and immediate shore line are such a major part of our Fiordland national park, let's not destroy or have any negative impact on this area. Let's retain most of the lake for individuals to enjoy and experience the environment without having to see or hear commercial operators all over the lake. Should this application be approved it will result in more commercial operators seeking to operate anywhere on the lake, such additional application would be difficult to be declined if one commercially operator has such permissible activities all ready in place. Risk of additional vessels operating all over the lake. Would destroy the experience of lake Te Anau and Fiordland.
Outcomes : Decline the application! Or at least limit the areas commercial operators can run their business on the lake, south arm and across the lake towards the mouth of upakaroa river. Noise/ visual pollution to the environmentally fragile areas!
File upload :

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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 1:39:45 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Catherine Brimecombe
Contact person : N/A
Email : [REDACTED]
Alternative contact : [REDACTED]
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential :
Name of submitter : Catherine Brimecombe
Organisation : N/A
Support oppose or neutral : I am Neutral on this Application (I am making a submission)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : I do not oppose the application but I do have concerns around the access to all areas of the lake by larger vessels.
Reasons : Larger vessels affect small boats including sailing dinghies, kayaks and paddle boards with their wash, and the amplified commentary does not stay on the boat. I believe some areas should be closed to larger vessels to preserve the wilderness experience of other users.
Outcomes : Some areas of the lake should be out of bounds for large vessels in order to maintain the wilderness experience for, and protect the safety of, other users, especially in areas where wash generated by larger vessels could impact their experience. As per page 76 of the application - 'Scenic cruises and/or charter cruises ex Te Anau Lakefront jetty to anywhere within Lake Te Anau (including via Te Anaau Glowworm Caves) that is zoned as front country and northern backcountry in the Fiordland National Park' (up to 960 additional trips per year) Also, on page 35 - H4. Effects on ecosystems and habitats - In my experience decks need frequent hosing and scrubbing with a solvent detergent to remain clean and this water runs off the decks into the sea or lake. During the busiest times of year, when deck scrubbing is needed at least daily, my concern is that the detergent could effect waterfowl and lake biodiversity in the immediate area. Maybe changes have been made to deck cleaning since I was last involved in this kind of work, but I would to know more about how this pollution will be managed.
File upload :

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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 1:47:30 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Nick Keizerwaard

Contact person : Nick Keizerwaard

Email : [REDACTED]

Alternative contact :

Phone/Mobile : [REDACTED]

New form element : [REDACTED]

Keep my contact details confidential : Yes

Name of submitter : Nick Keizerwaard

Organisation :

Support oppose or neutral : I Support this Application (I am making a submission)

Hearing request(2) : I Do wish to be heard in support of this objection or submission at a hearing

Specific parts : I am generally supportive of this application. Te Anau has real potential for greater activation of the lake, and I see genuine economic benefit for the region in opening up cruising into South Fiord and other currently underused parts of the lake — Real Journeys has operated marine-based tourism responsibly here for decades. My support is conditional on this not coming at the cost of public access, and on any associated infrastructure not occupying public space inappropriately. My support is also conditional on the applicant's stated intention to transition to a non-diesel vessel (electric, hybrid or hydrogen) actually being upheld, rather than simply used as a rationale for the length of term sought.

Reasons : My main reservation is the proposed 30-year term. This appears far longer than necessary to achieve the applicant's own stated goals of vessel replacement and wharf/infrastructure upgrades, and it locks in exclusive occupation of public conservation land for three decades, with no enforceable link between the term length and delivery of the investments used to justify it.

Outcomes : 1. Reduce the concession term from 30 years to 10 years, with a right of renewal conditional on the applicant demonstrating progress against the commitments made in support of a longer term (vessel decarbonisation, infrastructure upgrades). 2. Attach a condition requiring Real Journeys to demonstrably progress towards a low- or zero-emission vessel within a defined timeframe, rather than leaving this as an unenforced aspiration. 3. Ensure any expanded cruise activity (South Fiord and other lake areas) does not impede public access to the lake or place structures/infrastructure in spaces that should remain open to the public.

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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 1:50:50 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : J Arthur

Contact person : J Arthur

Email : [REDACTED]

Alternative contact :

Phone/Mobile :

New form element :

Keep my contact details confidential : Yes

Name of submitter :

Organisation :

Support oppose or neutral : I Oppose this Application (I am making an objection)

Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.

Specific parts : Insufficient time & the local community was not made aware of all the details. I request that submissions be extended & more information provided for the local community.

Reasons : Insufficient notification & information made to the local community, to make an informed decision. Only noticed this on the date of closure.

Outcomes : Extend the deadline for this application. Make public notice of the extent & limitations of this application to the local community & users of the lake. This would be generally done by making announcements on the local area community social pages. (FB) as no newspapers service Te Anau. Also to all rate payers of Te Anau through a local council & user groups of the lake.

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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 1:54:22 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Mark Buckland
Contact person : Mark Buckland. [REDACTED] resident.
Email : [REDACTED]
Alternative contact :
Phone/Mobile :
New form element :
Keep my contact details confidential : Yes
Name of submitter : Mark Buckland
Organisation : [REDACTED] Resident
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : Consent for additional boat trips around other parts of the lake.
Reasons : The lake already has small companies providing tours into other more remote parts. These are carried out in small craft with minimal impact. These are areas of quiet natural beauty that do not need multiple large vessel visits. Delicate shoreline would see impact from large vessel wakes and sand loss from beaches would be an issue. This area is loved by many for it's peace and quiet and relative isolation. I do not believe it is an appropriate place for large scale tourism.
Outcomes : No further large scale commercialization of our remote, quiet and isolated parts of the lake.
File upload :

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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 2:07:39 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Kimberly Cignoli
Contact person : Kimberly Cignoli [REDACTED] Resident
Email : [REDACTED]
Alternative contact :
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential : Yes
Name of submitter : Kimberly Cignoli
Organisation :
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : - The 30-year term duration requested for the entire lease and licence framework. - The lack of explicit spatial parameters regarding the requested larger jetty footprints. - The addition of new scenic operations, specifically the change to existing operations and the proposed South Fiord scenic cruise expansion. - Infrastructure modifications and excavation works, including shoreline dredging and temporary gravel pits. - Future structural allowances hinted at within the documentation regarding hydrogen/electric alternative fuel conversions.
Reasons : As a Fiordland resident, I acknowledge Real Journeys Limited's long history of valued conservation work and their reputation for showcasing our region. I strongly support their proposed infrastructure upgrades and minor roof extension; modernising these structures to ensure structural safety in all conditions is highly responsible, and visually, it will be a major aesthetic improvement. However, protecting our precious environment here in Fiordland requires a long-term, holistic approach to stewardship. A 30-year lease fails to provide this, as it locks in commercial rights for three decades without room for adaptive environmental management. While the new South Fiord scenic cruise is an exciting prospect, any expansion must be subject to an initial trial period, strict carrying-capacity reviews, and environmental caps rather than a three-decade open-ended approval. 1. Town Centre Squeeze & Infrastructure Deficiencies: An increase in vessel trips and overall passenger numbers has complex, compounding impacts on the immediate Te Anau town centre and surrounding businesses—bringing economic benefits but placing massive strain on community infrastructure. Crucially, the current visitor centre footprint is physically unable to safely or comfortably accommodate all passengers waiting during peak times, leading to severe congestion and pedestrian overflow. 2. Omission of Spatial Specs: Despite scouring the public documentation, there is a complete and absolute lack of technical specificity regarding the new jetty dimensions. It is impossible for the community to provide informed feedback on public land when the applicant fails to list the precise square-metre expansions or layout changes. 3. Lack of Spatial and Community Plan Alignment: Because this operation sits directly on public conservation land immediately adjacent to our community, it cannot be evaluated in isolation. The application lacks mandatory alignment with the Local Community Board Improvement Plans and the broader Fiordland Community Spatial Plan, risking disjointed, conflicting development on our shared lakefront. 4. Static "Snapshot" Assessments: The applicant's assessments of public lake traffic, noise pollution (external and internal informational

speaker broadcasts), and ecological loading are based entirely on a current snapshot. They completely ignore long-term regional population growth, expanding recreational lake usage, and cumulative commercial pressure over a 30-year window. 5. Unverified Dredging and Wildlife Risks: The application acknowledges the “potential to disturb terrestrial bird species,” yet provides an inadequate long-term mitigation framework. Furthermore, the extensive dredging proposed for the shoreline lacks an independent, peer-reviewed geological assessment to confirm if the work will structurally destabilize adjacent public lakefront areas or mandate massive retaining walls. 6. The Pending Legislation Clash & Public Sentiment: Granting a 30-year concession completely fails to take into consideration the incoming Conservation Amendment Bill and the first National Conservation Policy Statement (NCPS) currently with the select committee. Locking in a three-decade commercial rights right now isolates this operator from modern regulatory updates and carrying-capacity corrections. Furthermore, the Department of Conservation should be well aware of the strong public and community sentiments expressed in recent NCPS submissions—specifically the widespread demand for a long-term, holistic approach to stewardship and strict loading-limit boundaries on public conservation land. To lock in a 30-year term while these pivotal legislative overhauls are being actively shaped by public feedback is entirely inappropriate.

Outcomes : - Acknowledgment of Responsible Stewardship: The final approval should formally acknowledge Real Journeys Limited's long-standing history of conservation funding in Fiordland. The aesthetic improvements to the existing structures and the minor roof extension should be approved as they pose no visual degradation. - A 10-Year Term Compromise: To balance the operator's need for investment security with the public's need for ecological protection, the term must be capped at 10 years maximum. This provides a necessary block of commercial certainty while preventing a 30-year legal monopoly. - Independent Third-Party Impact Assessments: All environmental, hydrological, and acoustic impact assessments must be explicitly stripped from the applicant's internal data and instead be conducted independently by DOC or a DOC-selected third party. - First-Year Co-Managed Trial Periods: The proposed South Fiord scenic cruise must be subject to an initial one-year trial period, with mandatory, hands-on DOC ranger involvement on the ground to actively study, monitor, and measure the real-time wake impact and terrestrial bird disruptions. - First-Year Co-Managed Lake-Wide Assessment: Separate from individual routes, a formal, co-managed DOC assessment must be executed across the first year of the new lease. This study must actively monitor the cumulative, real-time impacts that the increased daily vessel trips and total passenger numbers will have on the shoreline ecosystem, ecological habitats, and the wider public and recreational users of Lake Te Anau. - Forced Local Board Alignment: A legally binding clause must be added stating that no construction or dredging can begin until the layout is formally aligned with and signed off by the local community board's spatial plans. - Separation of Alternative Fuel Infrastructure: Any future structural modifications to accommodate hydrogen or electric vessels must be completely barred from this approval. It must be treated as a separate, standalone concession application down the track to allow for proper safety and hazard assessments. - Rigorous Dredging & Excavation Parameters: Explicit, non-negotiable construction timelines must be written into the conditions, ensuring the local community and visitors have clear notice of when the lakefront will be inaccessible.

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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 2:40:44 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Monty vass
Contact person : Monty vass
Email : [REDACTED]
Alternative contact :
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential : Yes
Name of submitter : Monty
Organisation :
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : All aspects of this submission
Reasons : Lake te anau and fiordland are an incredible asset for the people of New Zealand and especially the local community that uses the lake for recreational activities -fishing - hunting boating ect. All of these activities and the numerous others that happen in the area are great for people's wellbeing, the locals have an intrinsic sense of place here we love these mountains and valleys and lakesides. and that is why we value this place. Most of us love to get out and explore wild places, - Wild places that will become much less wild if a real journeys boat with 300 tourists onboard can turn up anywhere at any time. There are already other smaller operators that use some / most parts of the lake weather for cruises or fishing or other trips and these smaller operators have much less of a impact on the area (wakes - sound - emissions - or the eye sore of another massive cruise boat) not to mention the amount of incidents and accidents that real Nz has! Most people who live here know that tourism is a driving force behind this town and it's a great thing but we do not one company holding the monopoly on tourism . We also need to value that nature and being in the peace and quiet of it is the reason the tourists come here in the first place and will the (successful) application degrade it for others wishing to enjoy it .
Outcomes : Lake te anau does not need more large scale tourism or infrastructure it is part of the national park and should be protected from over exploitation of companies looking for commercial gain at the cost of the people of New Zealand.
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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 2:58:12 pm

Following phishing URLs are detected by Fortigate:

[REDACTED]

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Peach Lovell

Contact person : Peach Lovell - Individual

Email : [REDACTED]

Alternative contact :

Phone/Mobile : [REDACTED]

New form element : [REDACTED]

Keep my contact details confidential : Yes

Name of submitter : Peach Lovell

Organisation :

Support oppose or neutral : I Oppose this Application (I am making an objection)

Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.

Specific parts : Limited consultation with the public & local community Environmental impact & privacy concerns for utilizing drones/UAV's over the lake Term of concession (30 years)

Reasons : I am writing to formally log my objection to aspects of the comprehensive concession application submitted by Real Journeys Limited (Realnz) regarding their ongoing and expanded operations on Lake Te Anau. While I acknowledge the long-standing history of the operator in the region, I have concerns regarding the scope of the proposal, specific environmental/privacy impacts, and the duration of the requested lease. Limited Consultation with the Local Community The application outlines significant operational expansions, including added commercial scenic cruises, extensive lakebed dredging/gravel extraction right by the town center, and structural additions. These activities directly impact the shared front-country zone of Lake Te Anau. Despite this, there has been insufficient direct consultation with the local community, residents, and other lakefront stakeholders who will bear the daily brunt of these expanded activities and structural footprints. Implications of Utilizing Drones & UAVs Over Lake Te Anau The applicant has requested a 10-year permit to operate commercial drones (specifically referencing a DJI Air 3) over the lakefront jetty, the glowworm caves wharf, and along the primary vessel cruise paths. I strongly oppose the inclusion of this drone permit on the following grounds: Eco-Safety: Lake Te Anau is a vital habitat for indigenous bird species, including the Papango, Paradise Shelduck, Grey Duck, and Australasian Grebe. Regular drone flights risk disturbing these populations, particularly during nesting seasons. Marine & Aviation Safety: The lakefront is a highly active, congested front-country zone especially in the summer months, utilized by recreational boaters, kayakers, swimmers, tourism operators and aviation operators - including the floatplanes and helicopters that operate at low altitudes over the water. Introducing regular UAV flights into this flight path presents an unnecessary safety hazard & indicates to the public that drone usage in the National Park is acceptable. Privacy Invasions: The proposed drone pathways cover the Te Anau Lakefront Jetty immediately adjacent to the town centre and key scenic routes. This presents a potential breach of privacy for local residents living along the lakefront, as well as guests staying in lakefront accommodations who expect undisturbed tranquility. Strong Opposition to the 30-Year Concession Term RealNZ is requesting a 30-year term for their

wharves and watercraft concessions. A three-decade lock-up of public conservation land and water space is in my opinion overstated. It limits the Department's capacity to dynamically manage public assets, reduces competitive equity for other local operators, and outpaces any predictable environmental or technological changes. Any approval granted should be restricted to a standard, significantly shorter term (e.g., maximum 10 years) to allow for regular public/community review and environmental re-assessments. Outcomes : I urge the Department of Conservation to decline the drone and UAV promotional filming permit completely to protect local privacy, wildlife, and lakefront safety and limit the requested 30-year term, capping any structure or watercraft concession to a maximum of 10 years to ensure it remains subject to public notification and regular reviews.

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Submission 27

From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 3:19:46 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Rosemary Seyb
Contact person : Rosemary Seyb
Email : [REDACTED]
Alternative contact :
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential :
Name of submitter : Rosemary Seyb
Organisation : Individual
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : I object to the number of years for the Concession. I object to the increase of charters on the lake and the lack of restrictions on these charters.
Reasons : This concession will increase activity on the lake and if it is locked in for 30 years the Community and private users are shut out. The lack of public consultation is already an example of how this concession would work
Outcomes : The number of years for the concession. The increase in the number of charters allowed. The lack of restrictions on these charters
File upload :

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4 September 2026

To: Director General, Department of Conservation, Te Anau District Office

Re: Concession application by Real Journeys Limited for continued and expanded occupation of Lake Te Anau infrastructure, an additional passenger vessel, expanded cruise activities and a 30-year concession term.

Dear Sir/Madam

Opposition to 30-year concession for Real Journeys

I oppose the application to grant Real Journeys a 30-year concession.

While I recognise the historical role the applicant plays in local tourism and regional transport, the proposed scale and timeframe present significant environmental and conservation risks that must be heavily scrutinised under the Conservation Act 1987.

I do not consider that Real Journeys has provided an adequate justification for why it considers it needs a 30-year concession.

I am concerned that the DOC website gives a misleading, understated, impression of the nature of the application stating it is “for the continuation of passenger transfer services and cruise activities on Lake Te Anau” whereas the application involves substantial upgrade and increase of the footprint of the Te Anau wharf and substantial uplift in activity.

If the application is approved or approved in modified form, the fees that Real Journeys pay should reflect the commercial value and nature of the activity and should reflect the significant increase in activity (bigger footprint, more ferries and more passengers).

This raises a fundamental fairness issue. If public land is to be used commercially, the public should receive a meaningful financial return.

Key areas of concern

- **Excessive Lease Term:** A 30-year term is exceptionally long for a national park concession. This timeframe reduces the Department of Conservation's (DOC) agility to adapt to future climate realities, changing ecosystems, or shifting biodiversity targets within Fiordland National Park.
- **Ecosystem and Wildlife Disruption:** Continuous vessel operations to and from Te Anau present ongoing risks of shoreline erosion, wake disruption, and reduction in the amenity value of the lakefront.

Lack of adequate justification for why a 30-year concession is needed

The justification for a 30-year concession suffers from ‘maybeism’.

Real Journeys MAY invest in replacement vessel or vessels.

Real Journeys MAY invest in non-diesel technology.

Real Journeys MAY invest in fully electric or hybrid or hydrogen powered vessels if or “when this technology becomes more reliable and readily available.”

Real Journeys MAY upgrade the wharves.

No commitment is made to any of these things. Real Journeys is asking for a 30-year lease on the basis that they MAY make certain investments or they MAY not.

Nor is there any explanation as to how Real Journeys has been able to invest in wharf infrastructure and ferries prior to now and in the absence of a prior 30-year lease but now needs a 30-year lease. What appears to have changed is that Real Journeys want to capitalise the value of a long-term lease (potentially artificially inflated by low or non-commercial annual fees).

F. Term

Please detail the length of the term sought (i.e. number of years or months) and why.

Note: An application for a concession for a period over 10 years must be publicly notified, an application for a concession up to 10 years will not be publicly notified unless the adverse effects of the activity are such that it is required, or if an exclusive interest in the land is required.

30 Years

26

Real Journeys is requesting up to a 30-year concession term to enable investment in replacement vessel or vessels that are not solely diesel powered, when this technology becomes more reliable and more readily available. That is transition to the transport to and from Te Ana-au Glowworm Caves and for Lake Te Anau scenic cruises to either fully electric or hybrid or hydrogen powered vessels. Moreover, during the term of this concession, it is likely that the wharves, the Real Journeys Lakefront mooring (102156-OTH) and Tawera Slip (PAC 14-18-51-01) associated with this application will all require upgrading which will require further investment. Hence sufficient concession term is required to get a return on these proposed investments.

Proposed conditions and recommendations

Should a concession be granted, I request that the following conditions be imposed:

- Reduce the term length from 30 years to a maximum of 10 or 15 years to allow for formal, regular conservation impact reviews.
- Restrict or cap vessel movements within designated backcountry zones to preserve wilderness values.
- Mandate strict carbon-reduction timelines, requiring the operator to transition to low-emission or electric vessels over the lifetime of the concession to align with New Zealand's net-zero targets.

Yours faithfully,

R Allen

Submission 29

From: [Alison MacFadgen](#)
To: [DNSubmissions](#)
Subject: 126048-WAT Real Journeys Ltd
Date: Friday, 4 September 2026 4:12:24 pm

You don't often get email from [REDACTED] [Learn why this is important](#)

As a resident of Te Anau, I strongly object to this consent for Real Journeys to have so much presence on our lake. This would be very invasive to our lake, and the other local lake users!! 30 years! And so many trips, it's hard to believe this is even being considered!! This would be damaging to our area!

From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 4:40:23 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Jane Arthur
Contact person : Jane Arthur
Email : [REDACTED]
Alternative contact :
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential : Yes
Name of submitter : Jane Arthur
Organisation :
Support oppose or neutral :
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : All of it
Reasons : We, as residence of Te Anau were never informed of this far reaching application for concession. Which makes me suspicious that this was the intention of DOC and RealNZ so that it would go through before anyone knew about it. The fact that it has not been freely "advertised for agreement or opposition" by the locals, would imply corruption.
Outcomes : DOC and RealNZ need to extend the time for locals to accept or reject the concession application. ALL residence need to be made aware of RealNZs plans. I swim in the lake and want to know about my safety. My husband fishes in the lake so what about his right to fish in peace & safety? What about the tranquility of lake Te Anau? What about boat emissions into the lake which will increase exponentially? I think this submission for concessions application in stealth mode is disgraceful of both DOC and RealNZ.
File upload :

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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 4:12:52 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Louise Wilson
Contact person : Louise Wilson
Email : [REDACTED]
Alternative contact :
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential :
Name of submitter : Louise Wilson
Organisation :
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : The term of 30 years of the concession. The lack of consultation. The impact on the local community and environment.
Reasons : 1. The term of 30 years for the concession is far too long. It is nothing short of outrageous that a 30 year concession could be considered to be granted in a World Heritage Area and National Park. 2. The lack of consultation with the community is unfair, for Real Journeys to expect to increase their boat volume and tour routes into more remote parts of our lake demands public consultation. 3. The environmental effect of more large boat operations on the lake should require an independent assessment into any environmental issues arising from this. This lake already suffers wave surges from these boats. 4. This is not simply a renewal of concession, the scale of this application has colossal effects on the Te Anau community and recreational users of the lake and as such, should demand community consultation. 5. The safety of all recreational users of the lake with an increase of large boats, this lake is very busy during the summer period and recreational users are entitled to some peaceful areas to fish etc.
Outcomes : 1. Provide a well publicised opportunity for all the local community and lake users to be to make submissions. 2.Reconsider the 30 year term to protect our environment and community. 3.Commission an independent report on the impacts of a. expanding both of the jetties b. expanding the fleet c. expanding tour routes d. increasing the concession from 10 to 30 years
File upload :

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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 11:18:04 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Sam Brewer
Contact person : Sam Brewer
Email : [REDACTED]
Alternative contact :
Phone/Mobile :
New form element :
Keep my contact details confidential : Yes
Name of submitter : Sam Brewer
Organisation :
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : I have opposed a 30 year lease I have also opposed the ability for them to scenic cruise/charter on all parts of Lake Te Anau
Reasons : This goes against Docs fiordland national park management plan for backcountry areas as preferred maximum group size is 15 with maximum numbers seen 40. Most operators only get a 10 year lease so dont think it should be any different for anyone else Keep South Fiord and other parts of lake te anau remote and peaceful There is enough wake undermining the lake front as it is from the company as I t is.
Outcomes : An even playing field for all operators. Do not give them concent to run more trip or have it for 30years. I'm happy if they need to maintain their jetties for all to use even digging the ground out from around them.
File upload :

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From: docwebsite@doc.govt.nz
To: [DNSubmissions](#)
Subject: Real Journeys Limited - Submission summary
Date: Friday, 4 September 2026 9:57:50 pm

The following has been received via the application form for a concession by Real Journeys Limited.

Submitter's name : Michelle Grant
Contact person : Michelle Grant
Email : [REDACTED]
Alternative contact :
Phone/Mobile : [REDACTED]
New form element : [REDACTED]
Keep my contact details confidential : Yes
Name of submitter : Michelle Grant
Organisation :
Support oppose or neutral : I Oppose this Application (I am making an objection)
Hearing request(2) : I Do Not wish to be heard in support of this objection or submission at a hearing.
Specific parts : Firstly I have only just heard about this on the community page 9pm on the date submissions close. This is supposed to be notified and this has been kept so quiet and not given time or even people awareness in the community about this. I think it is really important that you make people aware of this and advertise this if it is notified, it seems to be happening under the radar. I object to the 30 year lease I also object to charter cruise/scenic cruises on any part of lake Te Anau
Reasons : Most concessions are given at 10 year intervals and Im sure most operators could say that they are investing into fuel efficient vehicles or boats if they were guaranteed a 30 year lease but I think are you going to give other local operators the same term length of concession-it has to be fair and if you are going to give Real NZ a 30 year lease then I think you need to do this for smaller businesses too and operate on an even and level playing field. There are parts of Lake Te Anau that are remote and pristinine and in my opinion keep the large tour boats out of that-they can go to Milford or Doubtful. The South Fiord in particular already has 2 small companies-Faith and Cruise Te Anau that use this area and I think having a large boat going down there would ruin the peace and quiet of the place, it is also right next to the Murchison mountains which is the Takahe This also goes against Docs Fiordland National Park management plan of visitor management zones.
Preferred maximum party size for backcountry areas is 15 people. Typical visitor interaction levels for the whole trip encountering other vessels should be 40 or less. Given this I think it's important to keep the back country and remote parts of Lake Te Anau undisturbed by boats with 15 or more people so it fits what is in the management plan for remote areas. I have no objection to Jetty improvements or cave operations (other than 30 year lease)
Outcomes : 30 year lease Keep restrictions on where on Lake Te Anau Real NZ can operate and to object to charter/scenic cruises anywhere on the Lake. Keep to what they do now-Glow worm caves from either Te Anau or Te Anau downs
File upload :

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