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Date: 18 February 2019

Attention: Permissions Team/Wayne Costello

Application for Guiding Concession Licence

1. Introduction

1.1 Background to Concession

Alpine Guides Fox Glacier Limited ("AGFG") currently holds a concession to conduct public guided excursions on the Fox Glacier/Te Moeka o Tuawe; and to provide mountaineering, ski mountaineering and tramping guiding services in the Tai Poutini Westland National Park ("WNP") under **Guiding Concession WC/001/Gui**. The concession allows AGFG to use Park huts on a non-exclusive/non-preferential basis and to install a small emergency food locker in any of those huts, on an approved basis. The concession was varied in 2006 to include the ability to take commercial photographs of customers; and in 2017, to include a co-siting provision ("Guiding Concession"). AGFG has held the Guiding Concession since 1984 and it expires in 2024.

AGFG also holds a related concession, which permits it to land 60 aircraft per day at Victoria Flat (only while no safe, reliable foot access at the terminal face is available) under Landing concession 39396-AIR. This concession was varied in December 2017 to allow AGFG to carry out 8 landings per day at Victoria Flat for the purpose of conducting helihikes (collectively referred to as the "landing rights concession").

Both AGFG's Guiding and Landing Rights Concessions are subject to the Concession Allocation in Limited Supply Agreement, entered into between the Department, the Tourism Industry Association and the Ministry of Tourism in July 2008 ("PRA Agreement").

This application seeks to replicate the rights conferred by the current Guiding and Landing Rights Concessions; and to include some minor additional rights, detailed in section 4 below. The application is made pursuant to the rights conferred by the PRA agreement.

1.2 Statutory Framework

1.2.1 WNP: Management Issues

Glacier Guiding: The challenge for the Department is to achieve an appropriate balance between allowing as many people to enjoy the park as possible, without adversely

impacting the visitor experience or compromising natural heritage values including the natural appearance of the glaciers.

Aircraft: The primary concern for departmental management is the adverse effects of aircraft noise on the experience of walkers in the valley floors. The effects are assessed through regular monitoring.

Management intervention is recommended when more than 25% of surveyed visitors report annoyance with aircraft. The current monitoring methodology and thresholds are being reviewed as part of the National Park Plan review. New approaches including measurement of soundscapes are being evaluated as future monitoring mechanisms.

1.2.2 WNP: Plan Policies

Visitor Access: The visitor access policy suggests that the Department is required to foster public use of the park provided landscapes and natural features are preserved; people are kept safe; and conflict between visitor groups is minimised. We understand that in this context 'conflict' means visitor "...dissatisfaction attributed to another individual's or group's behaviour" (Manning, 2011, p.208). Hence, the Department is required to achieve an appropriate balance between the sometimes-competing interests to ensure that all visitor experiences (in the air, on the glacier, in remote park areas and in the valley for freedom walkers) are high quality. The Plan provides for limiting numbers and access as a mechanism for achieving safe, quality experiences.

Aircraft Access: The policy recognises that although aircraft landings can enhance the appreciation of visitors who would not otherwise be able to experience the glaciers and snowfields, aircraft can also detract from the park's general amenity values of quietness and remoteness and the experiences of other visitors. Therefore, all aircraft landings in the park must be authorised through concessions, which are the Department's mechanism for controlling the effects of noise and managing the balance of competing interests of different users of the Park.

The Plan policy allows for 25 landings per day at Fox Glacier, below the 900 metre contour line, plus an additional 60 landings per day when foot access is not available onto the lower glacier.

Visitor monitoring continues to be the key tool for measuring the effects of aircraft activity on recreational users of the Fox Glacier Valley. A breach of the current 25% annoyance threshold may lead to the Department imposing changes including reducing the number of landings allowed; increasing the flight altitude; changing flight paths; or restricting flight and landing times to allow for quiet periods.

It is noted that when the WNP was first approved in 2001, there were fewer visitor numbers to the region and lower demand. Also, the glacier environment has changed since then, with additional landings substituting the rights to guide on the lower glacier. Given the current rate of glacial recession, it is likely aircraft will be the main source of access for the foreseeable future.

Glacier Guiding: This policy relates to guiding on the Fox Glacier/Te Moeka o Tuawe below the 900-metre contour line. It contemplates the changing nature of the glacier environment and the cumulative effects of congestion, crowding and safety issues in all scenarios, whether the glacier may be advancing or retreating. It also requires that policy decisions should contemplate the need to get groups off the glacier when poor weather sets in or providing appropriate shelter for them on the glacier if the concessionaire can't evacuate people safely.

2. Proposed Activity

2.1 Guiding Products

2.1.1 Products accessed from the valley Floor

The first three products described below are not currently offered by AGFG. In 2014, when environmental conditions in the Fox Glacier valley changed, access on to the ice from the valley floor, became unsafe. Accordingly, only Terminal walks are currently being offered.

However, all product descriptions are included in the application because AGFG will seek to re-institute guided trips from the valley floor if environmental conditions change again to afford safe reliable foot access.

Half Day – approximately 3.5 hours duration and 1-hour ice time; up to 8 departures per day between the hours 8am and 7pm (summer) and 9am and 5.30pm (winter). Maximum 2 guided groups per departure. Guide to client ratio is 1:15

Full Day – approximately 7 hours duration and 4 hours ice time; up to 6 departures per day between the hours 8am and 6pm (summer) and 9am and 5pm (winter). Maximum 2 guided groups per departure. Guide to client ratio is 1:12

Ice Climbing – approximately 9 hours duration and 6 hours ice time; up to 2 departures per day between the hours 8am and 5pm (summer and winter). Maximum 4 guided groups per departure. Guide to client ratio is 1:4

Terminal Walk – approximately 2 hours duration; 8 departures per day between the hours 7am and 7pm (summer) and 8am and 4pm (winter). Maximum 3 guided groups per departure. Guide to client ratio is 1:15

The WNP Plan currently allows up to 450 customers per day to be guided on the Fox Glacier from the valley floor. Before ceasing operations in 2014, whilst AGFG never reached capacity, it did come close at the height of busy summer periods.

2.1.2 Products Accessed by Helicopter

The following products are currently offered by AGFG.

Heli Hike – approximately 4 hours duration and 3 hours ice time; 9 departures per day between the hours 6.30am and 3pm (summer) and 7.30am and 2pm (winter). Maximum 3 guided groups per departure. Guide to client ratio is 1:11

Full day Heli hike — approximately 8 hours duration and 6 hours ice time; 1 departure per day between the hours 8am and 5pm (summer and winter). Maximum 2 guided groups per departure. Guide to client ratio is 1:5

Ice Climbing – approximately 8 hours duration and 6 hours ice time; 1 departure per day between the hours 8am and 4pm (summer and winter winter). Maximum 3 guided groups per departure. Guide to client ratio is 1:4

Chancellor Hut – offer day and overnight trips to Chancellor Dome, staying at Chancellor Hut. Offered only in the summer months. Maximum 3 guided groups per departure. Guide to client ratio is 1:4

The WNP Plan does not currently set limits on guiding numbers at Victoria Flat through the Guiding Concession mechanism. Rather, it uses aircraft landing rights as the mechanism for doing so. Currently the WNP Plan, through landing rights concessions issued, provides for a maximum of 25 aircraft landings per day for positioning glacier guiding concession clients below the 900 metre contour line; plus an additional 60 landings per day when foot access onto the glacier is not available or is unsafe, provided that the increased aircraft activity does not result in 25% or greater proportion of visitors on the glacier valley floor walks reporting annoyance with aircraft resulting from survey monitoring.

The landings rights infer that a maximum of 309 customers can be guided on the ice per day, given AGFG's optimised trip schedule. AGFG regularly reaches capacity, particularly during the busy summer periods.

AGFG contracts in helicopter services; and relies on one other aircraft operator's landing rights to be able to service is customers. Principally the contracted operators use Squirrel helicopters, plus limited use of Hughes 500's. A squirrel carries six passengers per load and the Hughes 500, 4 passengers.

Departures are scheduled back to back. The first departures of the day fly the first group of visitors (and guides) up to the glacier and return empty. The 2nd departures transport the second group of visitors (whilst guides remain on the ice) and return with first departure visitors. This process repeats until the last trip of the day. For the last trip, the helicopter goes in empty and returns with the final group of customers. Up to a maximum of 33 customers are transported at each departure time. This equates to three guided groups (11 customers per group). The full logistical schedule for helihike and other currently operated trips is as set out in Appendix A.

Ice Climbing and Chancellor Trips are more niche offerings. In the busy season, typically there will be 2 groups of ice climbers per day and in terms of Chancellor, a handful of trips per annum.

2.2 Equipment, Track and Logistics

Equipment: Most guiding equipment for clients and guides is kept at the AGFG base building in town. It is carried in and out daily, on an as required basis. However, some equipment is stored on the ice, out of site of customers. This includes:

- 7 x 200 litre barrels & 3 x 400 litre boxes. Stored in these are tents, food, stoves and pots, LPG cooking gas, sleeping bags and mats. All of this is emergency equipment for shelter, food and warmth;
- 2 Portaloos, full containment type, for toileting. The location and photos of this gear is set out in Appendix B.

Permission to store this equipment has never been expressly included as a term of AGFG's concession, but has always been permitted by the Department, for safety and operational reasons.

AGFG also keeps a locker at Chancellor hut in which it stores overnight equipment (i.e. stoves and cooking equipment as well as sleeping bags). This is done with the permission of the Department.

Tracks: To conduct guiding safely, AGFG is required to form and maintain temporary track structures on the ice. This ensures good route selection and mitigates safety risk. Because of the nature of the glacier (moving and melting) the tracks require daily maintenance and/or reconstruction. Mostly the tracks require cutting of ice steps, placement of handlines and ropes and on occasion, installation of temporary bridges (using aluminium ladders). The tracks are prepared by guides before the trips start for the day and maintained by guides using them.

Prior to 2014, on the lower glacier, AGFG also built tracks to allow access onto the glacial ice. The locations would depend on ice conditions at the time. At times, the routes could be established directly from the valley floor on to the ice; and at other times, walking tracks and steps would be cut in the hillside on the true right side of the glacier, to allow access from the side. None of these tracks are currently in use.

Landing Pads: AGFG operates up to two helicopter landing pad structures at Victoria Flat, currently located at the positions set out in Appendix C. Two pads allow AGFG to maximise efficiency and deliver a better, safer, customer experience. The pads are carved from the ice. Appropriate terrain is identified; a flat landing pad is cut; stones and other debris are removed; and the ice is chipped to provide grip on the pad for both helicopters landing and people walking on it. For safety reasons, AGFG also uses several barrier structures to direct customers from the helicopter to the safe assembly area. Like the formed ice tracks, landing pads require constant maintenance; and periodically need to be relocated. AGFG has the permission from the Department to use chainsaws as and when required (letter of permission attached in Appendix H) Located at each landing pad are 6 crampon storage boxes. Photos are set out in Appendix C.

Logistics: The issuing of customer equipment and safety briefings takes place at the AGFG base building. Helihike customers are then transported by bus to the helicopter operator's hangar; and transported to the glacier by way of a short 6-minute flight. Terminal walk customers are transported by bus to the Fox Glacier valley car park. AGFG generally only has one bus in the car park at any time (under current glacier conditions i.e. no safe reliable foot access).

2.3 Filming

From time to time, AGFG carries out film work for marketing and promotional purposes (eg: videos for website, photos for brochures) relating to its business and promotion of the broader region. Commercial photographers are responsible for obtaining permits to carry out this work; but AGFG is also required to seek approval from the Department on each occasion this takes place.

2.4 Webcams

Currently, AGFG has installed mostly at its cost, webcams (and associated repeaters) at both Cone Rock and Victoria Flat. It uses these web cams principally to monitor weather conditions on the ice, which significantly mitigates safety risk. AGFG also provides free access to the webcams for the Department, helicopter operators and others, as part of its service to the community. Since installation of the webcams, weather call accuracy has improved significantly. It is considered an integral part of AGFG's safety management system. The locations of these are set out in Appendix I.

3. Place where activity will be carried out

Helihiking and Heli-ice Climbing: Customers are dropped off and picked up at Victoria Flat. Currently, guiding takes place in the zone marked on the Appendix D map. From a geotechnical perspective, this is the current safe guided terrain area. Routes within the area change (often daily) depending on ice conditions and location of interesting features (eg: caves). The zone itself also changes periodically depending on glacier conditions. Victoria Flat has a "back country with facilities" management setting in the current WNP Plan.

Chancellor trips: Helicopters drop off and pick up customers from the Chancellor Hut landing pad. Day trip customers generally walk to Chancellor Dome and back to the Hut before returning to base. Overnight trip customers walk to Chancellor Dome and return to the Hut for the night. The next morning, they walk down a rough route on the true right moraine of the glacier, climb onto the glacier and then are picked up at the Victoria Flat helihike site. Chancellor trips take place in an area with "remote experience" management setting in the current WNP Plan.

Terminal Walks: Customers are transported to the Fox Glacier/Te Moeka o Tuawe public car park and are guided up to the terminal face of the Glacier, or appropriate current look out points, using the public tracks available. The Fox Glacier valley, up to the Terminal Face of the glacier, has "front country with facilities" management setting in the current WNP Plan.

Half day and full day walks: These are not currently operating but involve walking up to the terminal face of the Glacier (as for Terminal walks) and then ascending onto the glacier either directly from the terminal face, or via AGFG built tracks on the true right side of the valley. Beyond the terminal face (ie: the access tracks and the lower part of the glacier) has a "back country with facilities" management setting in the current WNP Plan.

The Fox Glacier valley floor is an "intense interest site" under the WNP Plan management settings and an Icon Destination in the Department's destination management framework.

This means it is a high-profile, popular destination that is managed to support the growth of domestic and international tourism and provide memorable visitor experiences in New Zealand.

4. Type of Concession for which applicant is applying

AGFG seeks a concession in the form of a licence:

- 1. To carry our guided trips on Fox Glacier/Te Moeka o Tuawe below the 900 metre contour lines and on the valley floor;
- 2. To provide mountaineering, ski mountaineering and tramping guiding services in the Tai Poutini Westland National Park (WNP);
- 3. To use Park huts subject to reasonable conditions the Department may impose; and to install an AGFG locker in Chancellor Hut;
- 4. To take commercial photographs of customers;
- 5. which includes a co-siting clause;
- 6. To carry out 8 aircraft landings per day at Victoria Flat for the purpose of conducting helihikes and to carry out a further 60 aircraft landings per day at Victoria Flat only when no safe reliable foot access is available on the lower glacier;
- 7. to install, maintain and operate webcams at Cone Rock and Victoria Flat (and associated repeaters at Mt Fox) or in any other location in the Fox Glacier Valley as agreed from time to time with the Department;
- 8. to store emergency equipment barrels and portable toilets on the glacier in a manner agreed with the Department. Note, the equipment is stored for safety and emergency purposes including if customers get trapped on the glacier overnight;
- 9. to carry out film work within the boundaries of its concession operating area, for marketing and promotional purposes;
- 10. to host overnight camping trips at Victoria Flat, for a maximum of 14 pax (2 guides, 12 customers).

It should be noted that the matters listed in 1-6 above are terms already contained in AGFG's existing concessions. This application seeks to repeat those terms in the proposed new concession.

Items 7 and 8 are currently permitted in the existing concession regime, not as a strict term of the concession, but by side agreement with DOC. AGFG considers these are both critical to the safe operation of its business. It seeks to formalise them into the new concession to avoid the need to make formal applications to the Department throughout the period of the concession term and create unnecessary administration for both parties.

Item 9 is also currently permitted by DOC as and when required. AGFG seeks to formalise this into the new concession to avoid the need to make formal applications to the Department throughout the period of the concession term and create unnecessary administration for both parties.

Item 10 relates to a proposed new activity. AGFG proposes that:

- this would be a niche product offering, no more than one group per night, of no more than 14 customers. It is likely this trip would be operated principally in summer months and for niche "one-off" groups of customers. Weather variability would likely preclude a regular scheduled service;
- Overnight guests would use camping equipment that is currently located on Victoria
 Flat 11 tents (3 x 5 person and 6 x 8-person tents), a frame structure, stove and
 cooking equipment, sleeping bags and 2 x portable toilets with surrounding tent of
 approximately 1sqm. Photos of tents are set out in Appendix J. Tents would be
 taken down at the end of each overnight stay.
- This equipment is already stored on the glacier for emergency purposes in case groups get stuck overnight. In other words, there would be a negligible incremental impact from this activity on the environment;
- The groups would fly in with the last Helihike pick up at 6.00pm (which currently flies in empty) and fly out the following morning at 9.30am after the first helihikers have been dropped off (which flight currently flies out empty). In other words, there would be no incremental impact from helicopter activity.
- All food and other waste would be removed from the glacier after every trip.
- The activity is currently included as mountaineering and forms part of the current safety audit certificate issued by AdventureMark.
- The location of the activity would be as per the guiding zone in Appendix D and most likely take place close to where the storage boxes containing the equipment are stored (see photos and map in Appendix B). Exact site location would of course depend on current ice conditions and what is considered the most suitable and safest location.

The PRA Agreement provides that an incumbent may apply for a limited supply concession on fundamentally the same terms as the existing concession i.e. for the same activity; in the same location and of a similar scale (within 10% of existing use).

We read "fundamentally" to mean that the concession applied for must be essentially the same as the current concession, but that small variations can be agreed to as part of the process. The current concession includes all the accumulated variations of the original concession. We consider that the additional terms requested represent only minor changes to the current concession activity conducted by AGFG.

5. Potential Effects of the Proposed Activity

5.1 General: Short and overnight guided walks and guided climbing are recognised as low impact activities within the Departments Guide for "Preparing your Environmental Impact

Assessment". Also, Fox Glacier *Te Moeka o Tuawe,* is recognised in the Conservation Management Strategy Appendix 6 as a site of International Scientific Importance with a vulnerability rating of 3, meaning it is unlikely to be damaged by humans.

In other words, the Department has recognised that the proposed activity will have little physical impact on the natural environment. It is submitted that the key potential impact will be social.

5.2 Geographic: Fox Glacier/Te Moeka o Tuawe is a dynamic landscape and changes continuously. The ice moves at a rate of approximately 1 metre per day – melting, freezing, advancing, receding, with ice breaking off, moulins being created and rock fall occurring. AGFG cuts tracks and landing pads on the ice, but these structures represent a very temporary impact on the landscape. A few days of ice melt and these structures entirely disappear.

Overall, AGFG's physical impact on the glacier is minor to negligible.

- The only equipment and structures stored on the glacier includes emergency equipment barrels at Victoria Flat and barriers for controlling customers at landing pads. These are stored out of sight of customers.
- AGFG stores portable toilets on the glacier. These are for "emergencies" and are not used a lot in practice. Customers are encouraged to use toileting facilities before they leave town. All human waste is removed in sealed cartridges.
- Structures and facilities include tracks and landing pads, all of which are cut into the ice and eventually melt away. Some temporary bridge structures (aluminium ladders) are used to allow customers to cross crevasses. AGFG minimises use of these where possible, by finding alternative routes.
- None of the structures or facilities can be seen from the glacial valley and arguably, not from the air either, except when aircraft are coming in to land. Overall, the physical and visual aesthetic impact is very low.
- AGFG checks for and collects any rubbish that might be dropped by customers as part of its daily maintenance schedule.

The glacier valley is also dynamic. It rests on a major fault line and is constantly releasing rock fall into the valley which was once a solid mass of ice. The Fox river is created by glacial and snow melt and by rainfall collection from a large catchment in one of New Zealand's highest rainfall locations. The river deposits transient glacial moraine into the glacier valley and like the glacier, the valley floor is constantly changing. Human effects have little permanence.

AGFG uses the public track to access the terminal face of the glacier. The track is hard packed and requires repair or re-establishment from time to time as the glacial valley changes and rock fall or flooding cause damage. AGFG's physical impact on these tracks is nil to negligible.

AGFG has also formed tracks on the moraine wall of the glacier valley, in order to access the lower part of the glacier for half day and full day walking. These tracks are hidden from public view and not currently in use. The environmental impact of these tracks is minor.

Generally, there is little evidence of human occupation or activity in the valley. Some examples exist (DOC car park and toilets, Cone Rock and Chalet Lookout tracks, as well as AGFG's decommissioned bluff track) but generally the physical impact of tourism activities over the last 50-60 years on the environment has been minimal. Many sites which did exist have been destroyed by mother nature.

5.3 Flora and Fauna: The Glacier itself is not home to flora and fauna, but the surrounding mountains and hillsides are.

Helihikes: All trips which are accessed by helicopter at Victoria Flat are contained to the ice itself. There is no impact of these trips on flora and fauna.

Chancellor Hut: these trips do operate in areas where sensitive flora like the Ranunculus Lyallii (Mt Cook Lily) and the Celmisia Semicordata (Mountain Daisy) grow and customers interact with it as part of the guided experience. Occasionally, they may also spot a Chamois in the distance. Guided numbers on these trips are small (usually 2-4 people) so the interaction is closely managed and the impact, minor.

Glacier valley: this is home to a range of vegetation and there is potential for human impact. However, guided groups are confined to the hard packed, formed public walkway, having no negative impact on the flora. Similarly, when day walking was possible, guided groups were confined to the AGFG built tracks (which are now decommissioned), having no negative impact on the flora. The tracks themselves have a minor impact on the glacier valley and were built to have regard for flora and minimise any visual impact for other park users. Dynamic environmental change has a far more significant impact than humans do. The effect of slips, rock fall and flooding are well evidenced in the valley. Wildlife is rarely encountered with only the occasional interaction with Kea's or sighting of Chamois. Apart from worms/midges, there is little insect life of note.

5.4 Social

5.4.1 CMS: The CMS identifies the Fox Glacier/Te Moeka o Tuawe car park and glacial valley (up to the terminal face) as an intense interest site. It is in the front country with facilities visitor management setting. It is an area where very high public use occurs and should be expected, within a relatively confined area. The CMS is relevant to AGFG's terminal walks.

The Glacier (from the terminal face to the 900m contour line) is in the Backcountry-with facilities management setting and relevant to AGFG's half day and full day walking products as well as helihikes and ice climbing. Visitors here expect a considerable degree of physical challenge, self-reliance and isolation. The WNP Plan specifically contemplates use in that area by backcountry comfort seekers, which means frequent guiding opportunities can be expected to be offered and specialist equipment provided, allowing for the higher level of use. Group sizes should not exceed 15 people and interaction with other groups may vary between 0-10 groups per day.

The upper neve is in a Remote Experience management setting and is relevant to AGFG's Chancellor trips. The WNP Plan provides there is a high probability that visitors will experience isolation from the sights and sounds of humans and experience a closeness to nature. Group sizes are usually small and generally do not exceed eight people. Visitors may expect limited interaction with other groups in this zone within any one day.

These settings provide the context for considering the social effects of the proposed activity.

5.4.2 Visitor Experience: Nearly five hundred thousand visitors per annum visit the Fox Glacier every year. Some seek only a remote view of the glacier, some will walk to public lookout points from the valley car park and some will opt for a guided trip onto some part of the glacier. All visitors interact in some sense and have a social effect on one another.

The potential adverse social effect on visitors is recognised and AGFG understands it has an obligation to mitigate these.

5.5 Mitigation:

- **5.5.1** Front country with facilities setting: Currently, AGFG only offers Terminal face walks in this setting (for reasons explained above). Approximately 5000-6000 customers purchase this product each year. This constitutes about 1% of the total estimated 500,000 valley walkers per annum. Also, because all visitors to the valley either walk as freedom walkers or take an AGFG trip, it is likely that any customer acquired by AGFG merely displaces a freedom walker in the valley. In other words, the net social effect of AGFG activity is minor to negligible.
- **5.5.2** Back country with facilities setting Lower Glacier Walks: When day walking on the lower ice was possible, AGFG guided, at the peak, approximately 46,000 visitors per annum, 9% of the overall numbers walking in the valley. In the context of this social impact, AGFG notes the following:
 - The valley floor is an intense interest site, so a high level of interaction is expected;
 - Group size for day walking was a maximum of 15. No large groups were guided;
 - All visitors to the valley either walk as freedom walkers or take an AGFG trip. It is likely that any customer acquired by AGFG displaces a freedom walker in the valley.
 In other words, the net social effect of AGFG activity is negligible; and indeed AGFG groups were spread out throughout the day;
 - As AGFG walking groups arrived at the terminal face, they literally disappeared into the bush, to be guided up the AGFG formed tracks. The impact of these groups at that point, on other visitors to the park, was minor to negligible;
 - AGFG managed both group timing and access routes to ensure that in most cases, groups minimised their contact with each other.
- **5.5.3 Back country with facilities setting Helihiking:** This takes place at Victoria Flat. The key potential adverse effects can be from guiding (customers may feel crowded or congested because of other AGFG customers) and from aircraft noise (the noise can detract from the amenity values of quietness and remoteness for other visitors). We deal with each in turn.

5.5.3.1 Guiding:

No on-ice activity is visible to any other public users of the park. One cannot see Victoria Flat from the car park; and if visitors are flying over the glacier on a scenic flight at over 1000 metres (3,000 feet), it is very difficult to make out any groups on the ice. So, the effect of helihiking guiding on other park users, is minor to negligible.

AGFG's business ethos is customer and environment driven. At the core of this is a strong focus on service excellence. The attached survey data (Appendix E), which covers the last three years of AGFG's operation, shows (Slide 3) that service delivery is of a very high standard. AGFG has a strong focus on fun, friendliness, professionalism and education. The survey results show AGFG excels in these areas. The independent customer reviews on Trip Advisor show similar results. Of the 1443 current reviews conducted on AGFG's business, AGFG has received a combined Excellent or Very Good rating of 95%.

Slide 4 shows that customers do not feel crowded during the trips and where they do feel crowded (Slide 5) some do so in the glacial valley, some on the glacier itself and some in our base building when checking in (this is the predominant comment from customers in the category "other").

Delivering outstanding experiences is not only about service, but also about meticulous logistical planning. Over many years AGFG has fine-tuned trip timetables and structures, check in processes, IT and booking systems, pre-trip briefing and "booting up" processes, transport, liaison with helicopter providers, landing pad construction and positioning, route planning and guide management. These must be organised in such a way that customers do not feel congested, crowded, or hurried, at any time, but at the same time, cognisant of being in a wild exposed environment in a way which enables them to appreciate and enjoy it, without being threatened by it. This is difficult to achieve when processing several hundred customers on any given day.

AGFG's strong focus on managing congestion, crowding and satisfaction levels is directly aligned with The Department's objectives for visitor enjoyment documented in the WNP Plan.

5.5.3.2 Aircraft Noise:

The WNP recognises that whilst aircraft landings can enhance the appreciation of visitors to the park, they can also detract from the park's general amenity values of quietness and remoteness, for other visitors. The Department's controls these potential effects through the issuing of concessions, by active management (eg: signage) and by monitoring the effects of aircraft activity (currently using surveys). The WNP provides that a breach of the current 25% annoyance threshold may lead to the Department imposing changes including reducing the number of landings allowed; increasing the flight altitude; changing flight paths; or restricting flight and landing times to allow for quiet periods.

The WNP policy currently allows for 25 landings per day at Fox Glacier, below the 900 metre contour line, plus an additional 60 landings per day when safe reliable foot access is not available onto the lower glacier. AGFG currently holds 8/25 of the permitted landing rights

per day for helihiking and 60/60 of the additional permitted rights when foot access is not available onto the lower glacier. By this application it seeks to replicate those same rights.

The survey data in Appendix E shows that customers are currently satisfied with overhead aircraft noise while they are on the glacier (Slide 3) and that they do not feel crowded during the trips (Slide 4). While AGFG continues to work in these areas to improve the results, it considers overall, customer satisfaction is high.

There is no suggestion that AGFG is in breach the 25% annoyance threshold and it accepts that appropriate mechanisms are in place to address any breach of the threshold should it arise in the future. To this extent AGFG considers appropriate mitigation measures are already effected by the current WNP and concession structure.

5.5.3 Remote Experience setting: AGFG carries out approximately 15 Chancellor Trips per annum, with an average group size of 3 It is a niche offering and well within the bounds of the levels contemplated by the WNP Plan. The social impact is minor.

6. Proposed duration of the Concession

6.1 Term: AGFG seeks a term of 20 years for this concession.

6.2 PRA Agreement: The PRA Agreement provides:

- that in recognition of the realities of running a business, the rate of return, and in order to encourage investment and improvements in such operations, Limited Supply Concessions should have a standard term of 15 or 20 years, with five yearly reviews of all conditions. 15 years for activities such as guided walking, kayaking, etc; 20 years for activities involving larger capital investment, such as buses, aircraft, boats etc.
- terms may be longer where significant infrastructure is located on public conservation land; up to 30 years where significant infrastructure is involved e.g. campgrounds, hotels, ski fields; or up to 60 years in 'exceptional circumstances', as provided for in the Conservation Act 1987.
- while these terms are preferred, the term of every concession is at the discretion of the decision maker.

The Department has recognised that both the guiding and landing rights concessions form part of the PRA Agreement. It did so when it issued Franz Josef Glacier Guides a guiding concession under the PRA process; and Glacier Helicopters a landing rights concession for 17 landings per day at Victoria Flat for the purposes of servicing helihike business.

It is clear from the PRA agreement that AGFG is entitled to a minimum term of 15-20 years. AGFG considers 20 years is appropriate for the following reasons:

6.2.1 Capital Investment:

It requires a significant amount of capital and infrastructure to operate AGFG. The base building which it owns and operates, is valued at \$2.5 million and currently requires a further capital injection to keep it current and able to meet the demands of its customers; and the 16 houses/units that it or its shareholders own and supply for staff housing, have a

value in excess of \$3.5 million. In addition, AGFG spends well over \$100,000 per annum on rates, insurance, maintenance and management costs to manage its property infrastructure.

The AGFG housing stock is of an extremely high quality, in sharp contrast to some accommodation offered on the West Coast. Also, rents charged to staff are at levels lower than rates for similar level properties. AGFG employs a dedicated resource to manage housing.

AGFG also invests many hundreds of thousands of dollars in its bus fleet, vans and specialised guiding equipment. Whilst the vans and buses can be sold and have alternative uses, the specialised equipment does not. Servicing of these vehicles is done locally.

6.2.2 Investment in Property Infrastructure is a sunk cost:

Unlike capital investment in boats, buses and aircraft, AGFG's property related investments are a sunk cost into the township of Fox Glacier. If AGFG ceased operations, any alternative use for its base building and housing capital, or its ability to sell these assets, would be extremely limited:

- The base building has been purpose built for AGFG's guiding operation. Because of its size, configuration and its Fraemohs construction, its usefulness to other commercial businesses in Fox Glacier would be limited. The only realistic potential purchaser would be a replacement guiding company and as the only purchaser, AGFG's negotiating power with that party would be extremely weak;
- The sheer volume of the housing built and owned by AGFG and its shareholders, relative to the town's overall population and needs, means most of the housing infrastructure has a limited alternative use. The company and/or its shareholders own 16 houses/units in Fox, in a market where only 2-3 houses may sell every year. Furthermore, the only company that needs this much housing is AGFG. So, it is likely that in AGFG's absence, there would be very little demand to lease or buy these houses. The only realistic potential purchaser or lessee, would be a replacement guiding company, leaving AGFG in an extremely weak negotiating position.

On this basis, it is submitted that for all practical purposes, the building infrastructure owned by AGFG and its shareholders, is inextricably linked to the AGFG business and concession, much in the same way that ski field base buildings are linked to the business and concessions relating to skiing. In this regard, the PRA Agreement recognises that at a 30-year concession term may be appropriate where significant capital or infrastructure has been invested in the business on public conservation land.

AGFG considers that notwithstanding its infrastructure is not technically on public conservation land, the peculiar characteristics of it (significant amount of capital, sunk into single purpose buildings and housing, with limited alternative use and/or resale ability and inextricably linked to the guiding concession), it is arguably entitled to the grant of up to a 30-year concession.

Notwithstanding this, it is applying for a term of 20-years.

It is acknowledged that checks and balances can be included in the concession contract through review clauses, to ensure that quality and environmental standards are maintained and that AGFG remains compliant with concession terms.

6.2.3 Investment in the Community:

AGFG has chosen not to take the concession privileges it has for granted, but rather to take a long-term view of its place in the community and invest back in it. It also promotes and facilitates a culture of "giving back" amongst its staff, which compounds the effectiveness of the community work AGFG carries out.

The contribution AGFG makes has significant monetary value, but perhaps more importantly, delivers important (and some critical) services to the community. The Fox Glacier community would be crippled without its Ambulance, Fire and Search and Rescue services. An extended secure tenure for AGFG will benefit local residents through on-going support for these services, without which, there would be serious negative consequences for the Fox Glacier community.

Detail of this contribution is set out in 7.3 and 7.4 below.

AGFG also contributes significantly to the local Fox Glacier consumer economy, with shops, restaurants and bars all supported by the business and its staff. The extent of AGFG's contribution is particularly significant because it makes up such a large proportion of the local economy. It follows that the impact of a withdrawal of services by AGFG, would also have a very significant impact on this community, much more so than say in a bigger town like Franz Josef, where no single business has the same dominant impact on the town.

If AGFG were not concessionaire, or only had an expectation of short tenure, not only might support for critical services be withdrawn, but there would be a broader impact on consumption (if say large parts of the business were managed from a different city); lower local employment opportunities; potential impact on the school role and potential impact on housing values. This dynamic is arguably unique to AGFG and Fox Glacier and forms part of the rationale for this application.

AGFG considers that the nature of the investment made and the critical nature of the services to the community, constitutes a "specific local issue" (as defined in the PRA Agreement) which warrants the suggested approach to the granting of a 20-year concession term. AGFG considers it is reasonable to expect that its contribution and the impact on the community if it were to lose the concession or only be granted a short term, be recognised by the granting of a term which reflects the long term view it has adopted.

6.2.4 Quality Operation:

The statutory framework for management of the WNP Plan provides that the Department must allow as many people to enjoy the Park as possible, without adversely impacting the visitor experience (including minimising conflict, congestion and crowding) or the natural appearance of the glaciers. In addition, people must be kept safe.

By this application (including in section 7.3 below), AGFG considers it demonstrates how it supports the Department to deliver its objectives - by taking a partnership approach; by

respecting the environment it operates in; by delivering outstanding customer experiences; and by having an outstanding safety record. AGFG, by its actions, makes the job of managing issues in the Park easier for the Department. It saves management time and money.

AGFG's Shareholder Directors, Management and staff are passionate about what they do and are strong advocates of the environment they operate in. This, together with AGFG's high quality operating performance over time and its partnership style of operating, are factors which should be considered in granting a longer, rather than a shorter-term concession.

6.2.5 Precedent and Policy:

The PRA Agreement was entered between the Department, the Tourism Industry Association of New Zealand, and the Ministry of Tourism on 5 August 2008, committing the three organisations to a framework in relation to concession allocation in limited supply situations. The Agreement was implemented because of the Department's wish "to implement a process to better manage the allocation and re-allocation of limited supply concessions".

Applying the PRA Agreement, Franz Josef Glacier Guides ("FJGG") was granted a 20 year term, for a near identical concession to AGFG's. This has precedent value. In considering the PRA Agreement in the FJGG case, DOC concluded:

The Department considers that the applicant meets the PRA [Preferential Right to Apply contained in the Agreement] qualifying criteria. While the WNPMP [Westland National Park Management Plan] recommends that the term granted should not exceed 10 years, this is discretionary, and a 20-year term is consistent with the CALSS agreement [the Agreement] outlined above, therefore, it is considered that a 20 year term is appropriate.

Application of the PRA Agreement is also recognised in the West Coast Conservation Management Strategy, which contains the following policy statement:

The Department should apply the 'Concession allocation in limited supply situations guideline', developed in conjunction with the Ministry of Tourism and Tourism Industry Association New Zealand, in order to ensure the best outcome is achieved for natural, historical and cultural heritage values and recreational opportunities.

The relevance of the policy was referenced in the Department's recommendation/decision in the FJGG case.

AGFG submits that the West Coast Conservation Management Strategy policy together with the Franz Josef Glacier Guides Decision, creates a precedent and a legitimate expectation for AGFG to be granted a term of 20 years.

7. Other relevant Information Relating to the Applicant

7.1 Concession and Statutory Compliance

AGFG has never breached any term of its concession, or any provision of the related legislation.

None of AGFG's owners or key employees have ever had a criminal conviction or infringement action taken against them under the Conservation Act or associated Acts of Parliament.

7.2 Keeping People Safe

AGFG has an outstanding safety record. Since 1974, it and its predecessor have guided more than 1.3 million customers, in an extremely hazardous environment, with no fatalities and only two serious injuries. While AGFG always aims for zero harm, it submits this is an impressive record.

The safety system which delivers results of this magnitude is sophisticated, complex and is made up of many parts:

- Technical Training: AGFG sets high standards for technical training. All guides are trained to meet the minimum guiding standards set out in AGFG's Safety Management System and in doing so, follow a pathway to a New Zealand Mountain Guides Association (NZMGA) Hard Ice Guide (HIG) qualification. The full training process takes about 2 years. AGFG encourages (and funds) guides to seek qualifications beyond the basic requirements to guide on Fox Glacier; and financially supports guides to undertake offshore adventures in the off season, in the hope that they will travel, develop their skills and return, stronger guides for the experience.
- Guiding Culture: With his early training as a mountain guide with some of NZ's "greats", Mike Browne (founder of Alpine Guides Fox Glacier 1974 and remains a shareholder and Director) brought a set of core values to the industry of glacier guiding humility, respect for the environment and respect for those that have guided before us. These values remain entrenched in the culture of AGFG:
 - Knowledge is passed down: The early West Coast guides (including Peter McCormack, Harry Ayres and Frank Alack) were regular visitors to Fox and Mike ensured their knowledge and wisdom was passed down to his team. This culture endures, with long serving guides continuing to return, for short or long stints of guiding, to pass on their knowledge and wisdom. Some, like Gary Dixon, an International Mountain Guide, return regularly to Fox, to train and assess the next generation of guides.
 - Continuity of stewardship: Staying true to its values is assisted by Mike and Carrol's continuity of ownership; as well as AGFG's ability to retain key staff over the long term (Rob Jewell, AGFG's CEO, has been with the business for

- 12 years; and Marius Bron, AGFG's Operations and Risk Manager, has been with the business for 19 years).
- Systemising Knowledge Transfer: AGFG has developed systems to institutionalise historical lessons. An example includes diary logs and databases dating back many years, which record changes in the history of the glacier and pin point risk issues and hazards which have arisen over time. The data gathered is used to influence risk management decision making.
- Systems and Compliance: AGFG has a comprehensive Safety Management System,
 which is continuously being developed through internal review. In addition, AGFG
 enlists external support to review and test the efficacy of its systems and seek ways
 in which to improve practices.
- Cumulative Experience: AGFG has seen many changes to the glacier over decades of operating, including advances, retreats, rock fall and unexpected incidents. Each has taught something about how the glacier environment can behave. AGFG has methodically logged, analysed and learned from, these events. This has created a snowball effect of cumulative operating knowledge which improves its risk management and judgement.
- AGFG is Qualmark Accredited (current certificate attached at Appendix F) and certified to operate under the Adventure Activities Regulations 2011 (current certificate attached at Appendix G).

AGFG's emphasis on keeping people safe directly aligns with WNP Plan objectives.

It is submitted the safety culture carefully crafted over 45 years of operating; the institutional knowledge garnered about the Fox Glacier environment over this period; and the cumulative knowledge and experience of the people in the business, makes AGFG uniquely qualified to operate this business.

7.3 Partnership with the Department of Conservation:

A history of corporate social responsibility is a valid criterion to include in the conditions governing the selection of preferred recreation providers in the Park. AGFG has an established record of effective working relationships with the Department, and the company's corporate responsibility and wider contribution to the Glacier community is clearly set out in section 7.4.

In addition to paying more than \$1 million per annum in concession fees, AGFG makes many other significant financial and expert technical contributions to The Department, above and beyond its contractual obligations:

- Rockfall data: AGFG collects all rockfall data on behalf of the Department in the glacier valley (at no cost to the Department). This data is provided to the Departments geotechnical consultants and forms the basis for the Department's decision making around risk management in the glacial valley;
- Facilities maintenance: AGFG staff accompany Department staff several times per annum to clean out the toilet facilities and replace waste cartridges at Pioneer hut

(at no cost to the Department). AGFG staff manage safety on these trips and assist with the not particularly pleasant work. This is notwithstanding AGFG does not guide in this area;

- **Hut Inspections**: AGFG staff accompany Department staff on regular hut inspections, throughout the Park, outside of AGFG's operating area, providing guiding and safety management services (at no cost to the Department);
- Chancellor Hut maintenance: AGFG is largely responsible for all maintenance work carried out at Chancellor Hut (AGFG's contribution at no cost);
- **Helicopter Services:** While the helicopters used to carry out the work mentioned above are typically paid for by the Department, the Department will sometimes 'piggy back' on helicopter services paid for by AGFG. It should be noted that it is AGFG and not the helicopter company concessionaires, who fund these flights;
- Webcam: The current webcam at Cone Rock cost approximately \$15,000 to install and AGFG contributed 50%. The webcam gives the Department and other aircraft users of the Park access to real time footage of the glacier, allowing them to monitor changes to the glacier environment and make better weather calls. All maintenance work on the webcam is carried out and paid for by AGFG. The webcam installed at Victoria Flat in 2018, at a cost of \$20,000, was 100% funded by AGFG. The Department has access to camera images at no cost. The ongoing maintenance and data costs are funded by AGFG at an estimated cost of \$3,000 per annum.
- Conservation Governance: One of AGFG's Shareholder Directors, Mike Browne, has served on the Boards of both The West Coast Conservation Board as well as the New Zealand Conservation Authority.

7.4 Contribution to the Fox Glacier/West Coast Community

In addition to the work it does with the Department, AGFG also makes a significant contribution to the West Coast Community.

AGFG employs more than 60 people at the height of each season (20% of the population of Fox Glacier) and spends \$400,000 per annum on marketing AGFG, Fox Glacier and the West Coast region to the world. Local businesses directly benefit from this marketing investment.

Furthermore, AGFG and its staff are actively involved in the local community:

- Fire service: Currently, two of AGFG's senior staff are volunteer fire officers at Fox Glacier. Volunteers give up their time. AGFG contributes by paying staff full wages for call outs (estimated cost to AGFG \$6,000 per annum).
- Ambulance service: 4 out of the current 6-7 ambulance volunteers at Fox Glacier are AGFG staff. Volunteers give up their time. AGFG contributes by paying staff full wages for call outs (estimated cost to AGFG \$10,000 per annum).
- Search and Rescue: Almost the entire South Westland Search and Rescue team and Alpine Cliff Rescue team are made up of AGFG staff. Volunteers give up their time. AGFG contributes by paying staff full wages for call outs and allows the SAR team to use its technical equipment (estimated cost to AGFG \$25,000 per annum). AGFG also recently donated \$10,000 to help build the emergency services building at Fox Glacier.

- The critical nature of this service was recently highlighted when in November 2015 the Fox team responded to the incident where seven people were killed on a Fox Franz Josef Heliservices scenic flight. The Fox team took a leadership role on behalf of the community, fronting the media and helping with the recovery of bodies and helicopter fragments. The estimated cost to the business for this incident, in wages alone, was approximately \$20,000, notwithstanding the incident had nothing to do with AGFG.
- Fox Glacier Community Centre: AGFG made a \$60,000 contribution as seed funding for the recently built Fox Glacier community centre. AGFG was told that without its commitment, the centre would never have attracted the required funding from the West Coast Development Trust and would not have been built. In addition, one of its staff and one of its Shareholder/Directors serve on the Community Council which manages the facility.
- Glacier Country Tourism: Mike and Carrol Browne were foundation members of the Glacier Country Tourism Group and were similarly instrumental in the establishment of the Tourism West Coast Regional Tourism Organisation many years ago. They also both served on the governing bodies of these organisations for many years. Until very recently, the CEO of AGFG, Rob Jewell, chaired the Glacier Country Tourism Marketing Board, a position he held for 9 years. The job absorbed a significant amount of the CEO's work and personal time (at an estimated cost to AGFG \$20,000 per annum).
- Canterbury University Research: AGFG makes a significant contribution to Canterbury University's ongoing research programme into the West Coast glaciers. It plants and moves snow stakes, records data and sends the same to the researchers at the University. In addition, it provides helicopter transport to the researchers when they periodically visit Fox Glacier to conduct their work. It also gives the University access to time lapse camera photos taken from the webcam on the glacier (estimated annual cost to AGFG \$2,500 per annum).
- Fox Village: For 30 years and until very recently, as a service to the community, AGFG provided the post office facility for the town. It received an annual payment from NZ Post to carry out this service, which only partially covered costs (estimated cost to AGFG \$10,000 per annum). In addition, AGFG currently acts as a collection point for the delivery of all pharmacy medicines and prescriptions for the townsfolk of Fox Glacier. There is no charge to locals for this service.
- Operating Base: AGFG's operation is based in Fox Glacier. This means that as far as is practicable, AGFG employs locally, houses its staff locally, consumes locally and creates an environment where its staff are available and personally invested in giving back to the local community. Because AGFG makes up 20% of the population of Fox Glacier, its impact on the local economy is extraordinarily high. An alternative concessionaire, with a head office in another city, is unlikely to have the same level of investment in the local community. Numbers employed would be lower, consumption spend would be lower, the degree of care or awareness about local issues would be lower and even factors such as school roles and housing values could be affected.

In total, AGFG has contributed \$70,000 towards one-off projects over the last three years. It also contributes on an ongoing basis, an estimated \$75,000 per annum to the Fox Community (as detailed above) because it values its long-term place in the community.

Perhaps as significant as the direct financial contribution made by AGFG, is that AGFG enables its staff to give up their own time to contribute to the community. A culture of "giving back" is promoted and some job flexibility is provided to facilitate these personal contributions. The level of combined contribution far exceeds that of any other commercial tourism business on the West Coast. The benefit to the community is profound and demonstrates an extremely high level of corporate social responsibility. AGFG considers this factor relevant to this application.

8. Conclusion

AGFG has demonstrated by this application that it takes a long-term view of its place in the Fox Glacier and Department of Conservation communities and has invested and continues to invest accordingly. It seeks 20-year concessions on the terms set out in section 4 above.

Please do not hesitate to contact the writer if you have any questions.

Regards

Rob Jewell

CEO

Fox Glacier Guiding

Appendix A: Daily Trip Schedule for Products Currently Offered

Appendix B: Photos and Location of Equipment on the Ice

Appendix C: Landing pad Location

Appendix D: Guiding Zone Map

Appendix E: Customer Survey Results

Appendix F: Qualmark Endorsement

Appendix G: Adventure Activities Regulations Certificate

Appendix H: Chainsaw approval

Appendix I: Webcam map

Appendix J: Photos of tents





Applicant Information Form 1a Notified or Non-notified process

We recommend that you contact your usual permissions advisor, or the <u>appropriate Department of Conservation Office</u> to discuss the application prior to completing the application forms - see appendix for contact details.

Please provide all information requested in as much detail as possible. Applicants will be advised if further information is required before this application can be processed by the Department.

This form must be completed for all longer term applications (ie not one-off applications), then please fill in and attach the form(s) for the activities you wish to undertake. If extra space is required for answering please attach and label according to the relevant section.

Once you have filled in your application form, please complete this checklist to ensure that all components of your application form are complete. This will help prevent any possible delays in the processing of your application:

- € Legal status registration number (if not an individual)
- € Written testimonials (if required)
- € Written consultations (if applicable)
- € All appropriate activity application forms for concessions we require the applicant information form and relevant activity form(s)
- € Supporting evidence for Environmental Impact Assessment (if required)
- € Supporting information and detail including maps, site plans, building plans as required in activity forms. **Note some applications require GPS Co-ordinates**
- € Supporting evidence for details of activity forms
- € Have you read the section regarding the liability of the applicant for payment of fees?
- € Have you signed your application?

All efforts in putting together a detailed application are greatly appreciated and will allow the Department to effectively and efficiently process your application.

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A. Applicant Details

Applicant Name (full name of registered company or individual)

Alpine Guides Fox Glacier LTD

Legal Status of applicant (tick)

Individual

Registered Company

1

Trust

Incorporated Society

Other (please specify full details)

Please supply the company, trust or incorporated society registration number: 1688836

If an individual please supply your date of birth (this is a unique identifier for you):

Trading Name (if different from Applicant name)

Fox Glacier Guiding

Postal Address

P O Box 38, Fox Glacier 7859

Street Address (if different from Postal Address)

44 Main Road, Fox Glacier 7859

Registered Office of Company or Incorporated Society (if applicable)

Crowe Horwath, 13 Camp Street, Queenstown

Phone

03 7510 825

Website

www.foxguides.co.nz

Contact Person and role

Rob Jewell CEO

Phone

03 7510 825

Cell Phone

0275 975 049

Email

ceo@foxguides.co.nz

Contact Person and role

Phone

Cell Phone

Email

B. Activities applied for

Please fill in all the forms that are applicable in order to cover all the activities the applicant wishes to undertake on public conservation land. Please tick below the forms that have been completed, and attach.

| ACTIVITY | | FORM | 1 |
|-------------------------------|---|----------------|---|
| Grazing | | 2a | |
| Land use: | | | |
| A. B. C. | Tenanting and/or using existing DOC facility/structure Use of public conservation land for private/commercial facility/structure Easements across public conservation land including right of way, stock access, convey electricity, drain sewerage, waterpipes etc | 3a 3b 3c | |
| Guiding/Tou A. B. C. | rism/Recreation: Walking/Hiking/Tramping/Hunting/Fishing/Horses/4WD activities etc Watercraft activities Aircraft activities | 4a 4b 4c | ✓ |
| Filming | | 5a | |
| Sporting Eve | ents | 6a | |
| | | | |

C. Background Experience of Applicant

Please provide relevant information relating to the applicant's ability to carry out the proposed activity (e.g. details of previous concessions, membership of professional organisations and relevant qualifications). Attach details and label Attachment 1a:C.

The applicant is an existing concessionaire (WC/001-Gui) conducting glacier activities at Westland Tai Poutini National Park since 1974

Has the Applicant or any of the company directors, trustees, partners, or anyone involved with the Application been convicted of any offence? Does the Applicant or any of the company directors, trustees, partners, or anyone involved with the Application have any current criminal charges pending before the court? If yes, please supply details.



D. Testimonials

Please attach two written testimonials, together with the names, occupations, addresses and phone numbers of two people who will vouch for the proficiency of the applicant in the proposed activity. At least one testimonial should contain information in relation to the financial viability and standing of the applicant. These testimonials are to be labelled Attachment 1a:D.

E. Consultation Undertaken

Most applications require consultation with whanau/hapu/iwi (local Maori), and other interested parties. Please read the information on the DOC website and contact the nearest Department of Conservation office to discuss what is required. Written expert views, advice or opinions concerning your proposal may also be attached to support the application. Attach any proof of consultation to the application and label Attachment 1a:E.

F. Insurance

Concessionaires are required to indemnify the Minister against any claims or liabilities arising from their actions. If this application is approved, the applicant will be required to hold Public Liability, and possibly Statutory Liability and/or vehicle insurance. The level of cover will depend on the nature of the activity. Please contact the nearest Department of Conservation office to discuss what is required.

G. Public Notification

Some activities and/or types of concession applications require public notification if the Department forms an intent to grant the concession. This increases the time and cost of processing the concession. The usual circumstances when public notification is required are thus:

- The Application is for exclusive use of public conservation land (ie a lease);
- The Application is for a licence for a term longer than 10 years;
- Other concessions do not require public notification unless the adverse effects of the activity are such that it is required.

A permissions advisor can advise you as to the type of concession your activity requires and whether or not it needs notification.

H. Fees and costs

Processing Fees:

Section 60B of the Conservation Act contains the statutory provisions regarding processing fees.

The Department recovers all direct and indirect costs to process a concession application from Applicants regardless of whether the application is approved or declined. The cost of processing a concession depends on whether the application needs to be notified or not (see Public Notification section above), and/or whether the application is a standard application or is complicated/complex.

The cost of processing a standard non-notified concession is likely to be between \$2065 and \$2565 plus GST. If the application is assessed as complex, covers multiple regions, or includes more than 20 individual locations, this fee is likely to be higher. The Department will send an estimate of costs to the Applicant once the application has been assessed.

The cost of processing a standard notified concession is likely to be between \$3500 and \$5500 plus GST. This fee is likely to be higher if the application is assessed as complex, covers multiple regions, or if a hearing is required. The Department will send an estimate of costs to the Applicant once the application has been assessed. The Department will re-estimate the cost and provide this to the Applicant if further costs are likely due to significant public interest during the public notification process.

Applicants are entitled to request an estimate of costs at any point but the Department may impose a charge for preparing such an estimate. Estimates are not binding.

The Department will ordinarily invoice the Applicant for processing fees after a decision has been made on the application but in some cases interim invoices will be issued. If at any stage an application is withdrawn the Department shall invoice the Applicant for the costs incurred by the Department up to that point. Applicants are required to pay the processing fees within 28 days of receiving an invoice. The Director-General is entitled to recover any unpaid fees as a debt.

The Director-General of Conservation has discretion to reduce or waive processing fees. If your application is for landing aircraft for personal recreational use you may be eligible for a reduction of 50% of the processing fee.

The Department may obtain further information either from the applicant or from any other relevant source in order to process the application. The applicant will be advised of any information obtained from other sources. The cost of obtaining such information will be charged to and recovered from the applicant. The applicant will be informed as soon as practicable from receipt of the application if further information is required before this application form can be fully processed by the Department.

Ongoing Fees:

If your application is approved, you will also be required to pay annual fees throughout your concession. These are:

- Annual management fee to cover administration time; and/or
- Monitoring fee (if required) to cover the cost of monitoring the effects of your activity; and/or
- Activity fee per head (if a recreation concession), or a minimum fee per year; and/or
- Annual rental (if a land use concession eg lease)

Please contact the nearest Department of Conservation office to discuss the applicable fee and processing timeframe for the application.

Terms and Conditions for an Account with the Department of Conservation:

Have you held an account with the Department before? (Please tick)

Yes ✓ No

If yes, under what name: Alpine Guides Fox Glacier LTD

- 1. I/We agree that the Department of Conservation can provide my details to the Department's Credit Checking Agency to enable it to conduct a full credit check.
- 2. I/We agree that any change which affects the trading address, legal entity, structure of management or control of the applicant's company (as detailed in this application) will be notified in writing to the Department of Conservation within 7 days of that change becoming effective.
- 3. I/We agree to notify the Department of Conservation of any disputed charges within 14 days of the date of the invoice.
- 4. I/We agree to fully pay the Department of Conservation for any invoice received on or before the due date
- 5. I/We agree to pay all costs incurred (including interest, legal costs and debt recovery fees) to recover any money owing on this account.
- 6. I/We agree that the credit account provided by the Department of Conservation may be withdrawn by the Department of Conservation, if any terms and conditions of the credit account are not met.
- 7. I/We agree that the Department of Conservation can provide my details to the Department's Debt Collection Agency in the event of non-payment of payable fees.

Declaration

I certify that the information provided on this application form and all attached additional forms and information is to the best of my knowledge true and correct.

Note: The Minister can vary any concession granted if the information given in this application

contains inaccuracies.

Signature (Applicant)

Signature (Witness)

Witness Name

Witness Address

Date

20.02.2019

Date

20-02-2019

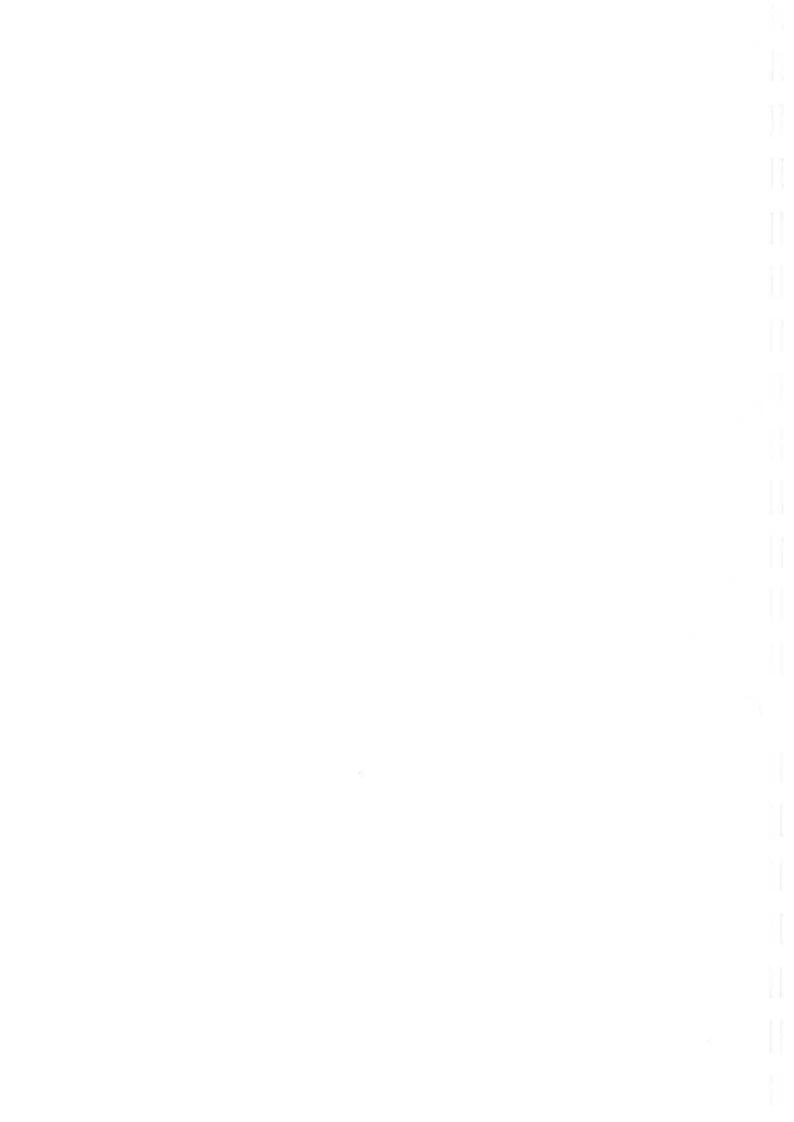
938 COOK Flat Road, Fox Glacier 7859.

This application is made pursuant to Sections 17R and 17S of the Conservation Act 1987 [and (where applicable) Section 49 of the National Parks Act 1980/Section 59A of the Reserves Act 1977].

mitchell

Applicants should familiarise themselves with the relevant provisions of the Conservation Act 1987, the Reserves Act 1977 and the National Parks Act 1980 relating to concessions.

Once the application is complete, the Minister has 20 days within which to advise the applicant whether the application is declined on the grounds that the application does not comply with or is inconsistent with the provisions of the Act or any relevant Conservation Management Strategy or Conservation



Management Plan. If the Minister does not so advise the applicant the application will be processed in accordance with Section 17T of the Conservation Act 1987.

The purpose of collecting this information is to enable the Department to process your application. The Department will not use this information for any reason not related to that purpose.

Applicants should be aware that provisions of the Official Information Act might require that some or all information in this application be publicly released.

| For Departmental use | | |
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| Credit check undertaken | | |
| Comments: | | |
| | | |
| Signed | Name | |
| Approved (Tier 4 manager | Name | |
| or above) | | |





Concession Application Form 4a – Guiding/Tourism/Recreation: Walking, Hiking, Tramping, Hunting, Fishing, Horses, 4WD Activities etc

The Department recommends that you contact the Department of Conservation Office closest to where the activity is proposed to discuss the application prior to completing the application forms. Please provide all information requested in as much detail as possible. Applicants will be advised if further information is required before this application can be processed by the Department.

This form is to be used when the proposed activity involves landbased guiding of clients on public conservation land. Examples may include hiking, walking, hunting, fishing, horse treks, or 4WD activities. This form is to be completed in conjunction with either Applicant Information Form 1a (longer term concession) or Applicant Information Form 1b (one-off concession) as appropriate.

- If your application involves transportation on public conservation land eg kayaking, boat transfers, aircraft landings, please also fill in Form 4b and/or Form 4c as applicable.
- If your application includes building, extending or adding to any permanent or temporary structures or facilities on public conservation land, please also fill in Form 3b,
- If your application includes tenancy of any DOC managed buildings (other than overnight usage of huts) please also fill in Form 3a.

Please complete this application form, attach either Form 1a or Form 1b (as appropriate) and any other applicable forms and information and send to permissions@doc.govt.nz. The Department will process the application and issue a concession if it is satisfied that the application meets all the requirements for granting a concession under the Conservation Act 1987.

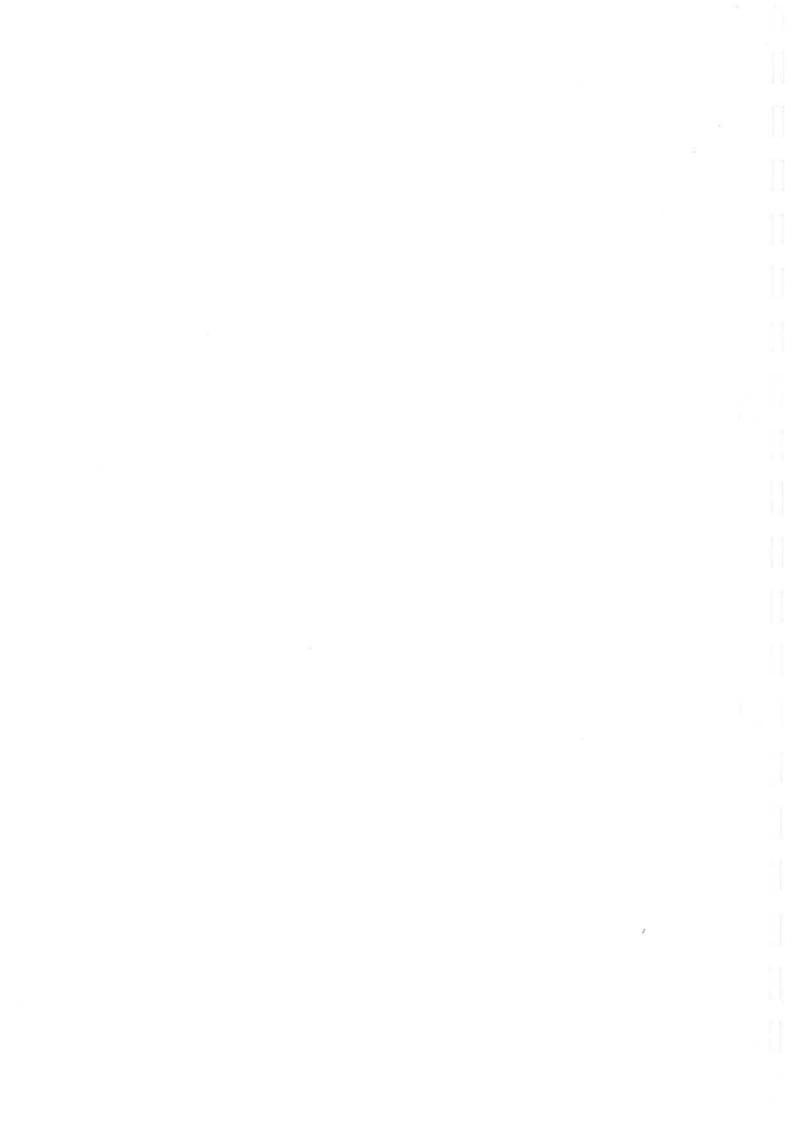
If you require extra space for answering please attach and label according to the relevant section.



A. Location(s) and Activity(ies)

List the areas of your operation, please use NZTM GPS coordinates where possible, and attach a map and label Attachment 4a:A. If you are unable to identify the areas or you do not know them, please seek the assistance of Departmental staff.

| Name of Conservation Area and track | Activity | DOC Facilities (eg huts) or informal campsites | Proposed months/season | Max. Party Size (incl. guides) | Frequency of Use (trips) | Duration of Visit: less than 1 hour; 1 – 4 hours; 4 – 24 hours |
|--|--|--|---------------------------|-----------------------------------|--|---|
| EG: Matiu/Somes Scientific Reserve: Matiu Circuit Track | Guided walk and nature interpretation | n/a | October - April | 6 рах | 6 trips per week Saturdays and Sundays | 1 – 4 hours |
| Westland Tai Poutini National Park, Victoria Flat | Glacier Guiding Helihike | | Year Round | 1 guide to 11 pax per group | | 1-8 hours |
| Westland Tai Poutini National Park, Victoria Flat | Ice Climbing | | Year Round | 1 guide to 4 pax per group | | 4-8 hours |
| Westland Tai Poutini National Park, Chancellor Dome | Guided Walk | Chancellor Hut | Year Round | 1 guide to 4 pax per group | | 4-48 hours |
| Westland Tai Poutini National Park, Fox Valley Terminal Face | Guided Walk | | Year Round | 1 guide to 18 pax per group | | 1 -4 hours |
| Westland Tai Poutini National Park, Lower Icefall Fox Glacier | Glacier Guided Half Day Walk | | Year Round | 1 guide to 15 pax per group | | 1-4 hours |



1 guide to 12 pax per group

Glacier Guided All Day Walk

Westland Tai Poutini National Park, Lower Icefall Fox Glacier



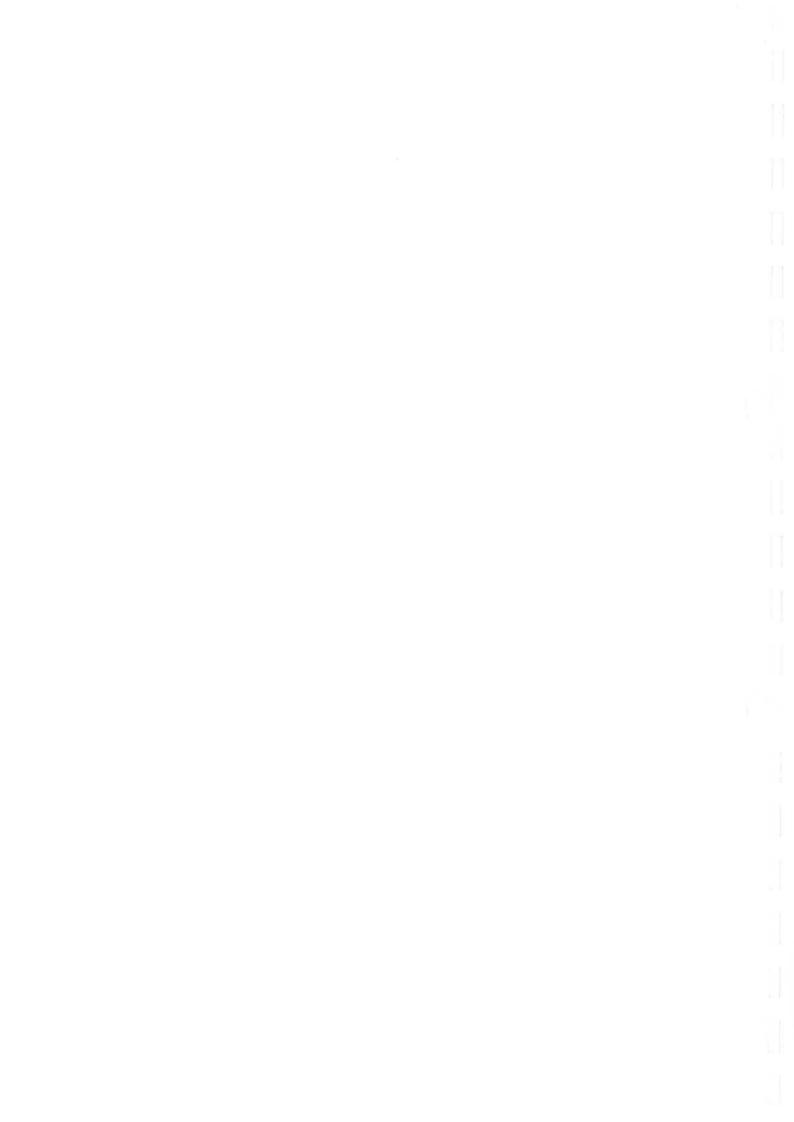
B. Environmental Impact Assessment

This section is one of the most important factors that will determine the Department's decision on the application. Please answer in detail.

In column 1 please list all the locations of your proposal, please use NZTM GPS coordinates where possible. In column 2 list any special features of the environment or the recreation values of that area. Then in column 3 list any effects (positive or adverse) that your activity may have on the values or features in column 2. In column 4 list the ways you intend to mitigate, remedy or avoid any adverse effects noted in column 3. Please add extra information or supporting evidence as necessary and label Attachment 4a:B.

Refer to Steps 1 and 2 in your Guide to Environmental Impact Assessment to help you fill in this section.

| Location on public conservation land | Special feature or value | Potential effects of your activity on the feature or value (positive or adverse) | Methods to remedy, mitigate or avoid any adverse effects identified |
|---|------------------------------------|---|---|
| EG: Matiu/Somes Island Matiu Circuit Track | Endemic geckos, skinks, tuatara | Damage to habitat when walking (adverse) Increase knowledge of native species through guiding interpretation (positive) | Ensure all clients stay on paths |
| Fox Glacier, Victoria Flat | | Permitted Use | Refer to attached application |
| Fox Glacier, Lower Icefall | | Permitted Use | Refer to attached application |
| Fox Glacier, Chancellor Dome | | Permitted Use | Refer to attached application |
| Fox Glacier, Terminal Face | | Permitted Use | Refer to attached applilcation |



C. Term

Please detail the length of the term sought (i.e. number of years or months) and why. If you are applying for a one-off permit please state the specific dates and/or times sought.

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.

20 years as contained in the Concession Allocation in Limited Supply Situations as an incumbent operator and the preferential right to apply as agreed between TIA and DOC in July 2008.

D. Bulk fuel storage

Under the Hazardous Substances and New Organisms Act 1996 (HSNO Act) 'Bulk fuel storage' is considered to be any single container, stationary or mobile, used or unused, that has a capacity in excess of 250 litres of Class 3 fuel types. This includes petrol, diesel, aviation gasoline, kerosene and Jet A1. For more information on Hazardous Substances, go to: http://www.business.govt.nz/worksafe/information-guidance/legal-framework/hsno-act-1996

Do you intend to store fuel in bulk on the land as part of the activity?

YES / NO

If you have answered yes, then please provide full details of how and where you intend to store the fuel, and label any attachments including plans, maps and/or photographs as Attachment 4a:D. If your concession application is approved you will be required to provide a copy of your HSNO compliance certification to the Department before you begin the activity.

E. Safety Plan

The Department requires that all concessionaires holding concessions for recreation or tourism activities have a safety plan which has been audited by an external expert.

If your activity is covered by the Health and Safety in Employment (Adventure Activity) Regulations 2011 proof of that audit is sufficient. If your activity is **not** covered by the Adventure Activity Regulations, please read the *Guidelines on the Requirements for Concessionaire Safety Plans* on the Department's website. If you are unsure please go to the WorkSafe website and read their <u>guidance</u>.

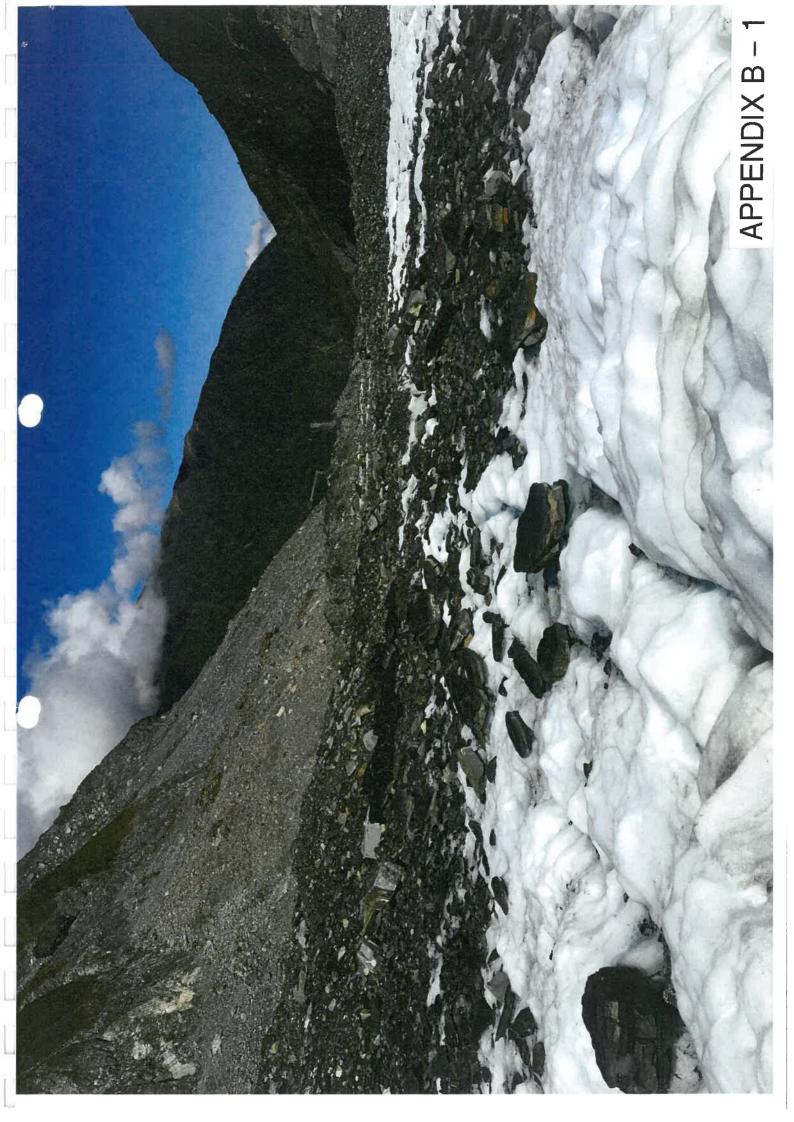
If your concession application is approved, you will be required to provide a copy of an independent auditor's approval of your safety plan to the Department before you begin the activity.

F. Other

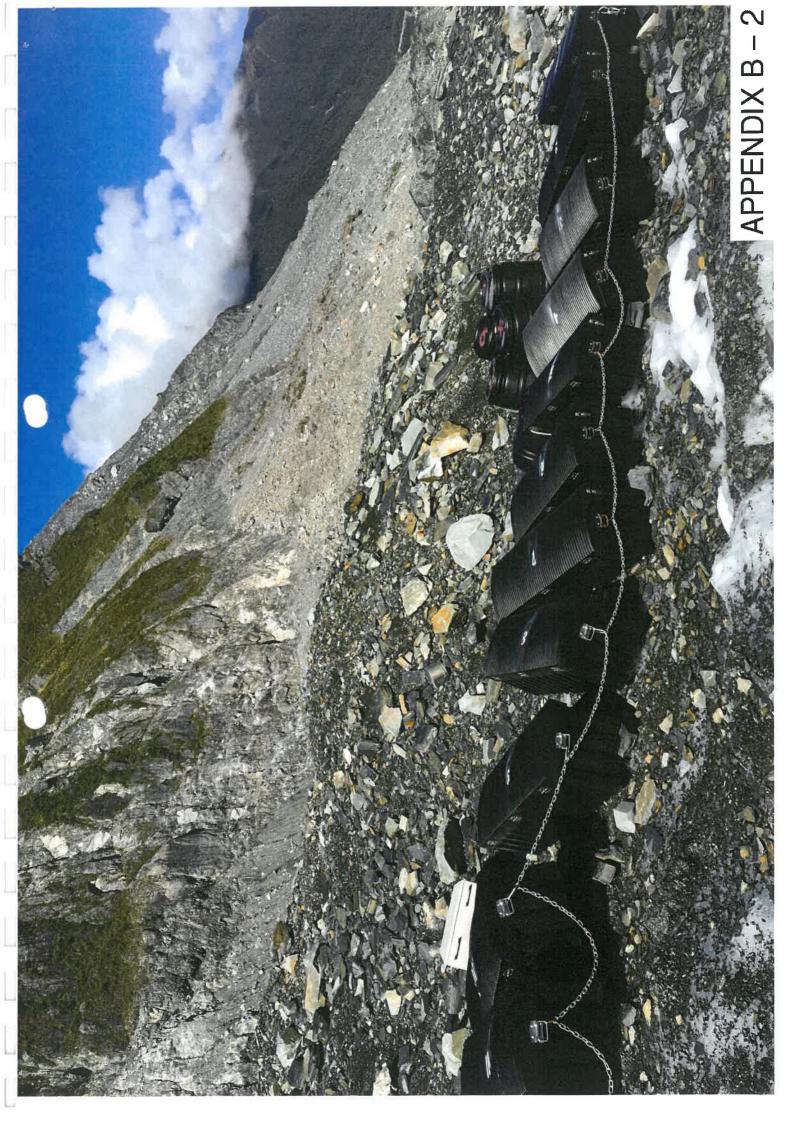
Is there any further information you wish to supply in support of your application? Please attach if necessary and label Attachment 4a:F.

| | 2018/2019 | Total daily flight time 10 hours & 24 | s and the same and | 8:15am Fox Trail | | 9:10am | 10:00am | | | | | | | | | | 5:00pm Fox Trail | | |
|-------------|-------------------------|--|--|------------------------------------|-----------------|------------------|--------------------|-----------------|------------------|--------------------------------------|------------------|------------------|-------------------------------------|------------------------------------|------------------------------------|----------------|------------------|----------------|-----|
| | Track | 2 loads = flight time 18 minutes | | Fly time 7:15am | | | | | | | | | | Fly out 3pm | | | | | |
| | IC/Extreme Fox 3 Guides | 12 pax 6 loads = flight time 48 minutes | | Check in 8:00am | Fly time 9:00am | | | | 10 ACT | | | | | | | Fly out 4:30pm | | | |
| Layer 1 | Flying Fox 3 Guides | 33 Pax/trip 99/day Up to 24 loads = flight time 3 hours & 12 | indres. | | | Check in 8:50 am | riy unite occupant | | | | Check in 11,50am | Fly time 12:30pm | | | Check in 2:50pm Fly time 3:30pm | | | Fly out 6:00pm | |
| Layer 2 | Flying Fox 3 Guides | 33 Pax/trip 99/day Up to 24 loads = flight time 3 hours & 12 | CONTRACTOR | | Check in 7:50am | Fly time 8:30am | | | | Check in 10:50am Fly time 11:30am | | | | Check in 1.50pm Fly time 2:30pm | | | Fly out 5:30pm | | |
| Layer 3 | Flying Fox 3 Guides | 33 Pax/trip 99/day Up to 24 loads = flight time 3 hours & 12 | Illinutes Inchilin Cifornia | Check in b:suam Fly time 7:30am | | | | Check in 9:50am | Fly time 10:30am | | | | Check in 12:50pm Fly time 1:30pm | | | Fly out 4:30pm | | | |
| Trip Timing | Schedule F19 | Flights time based on 8 minutes | 7:00am | 8:00am | | 9:00am | 10:00am | | 11:00am | 12 noon | | Ipm | 2pm | 3pm | 4pm | | Spm | 6pm | 7pm |

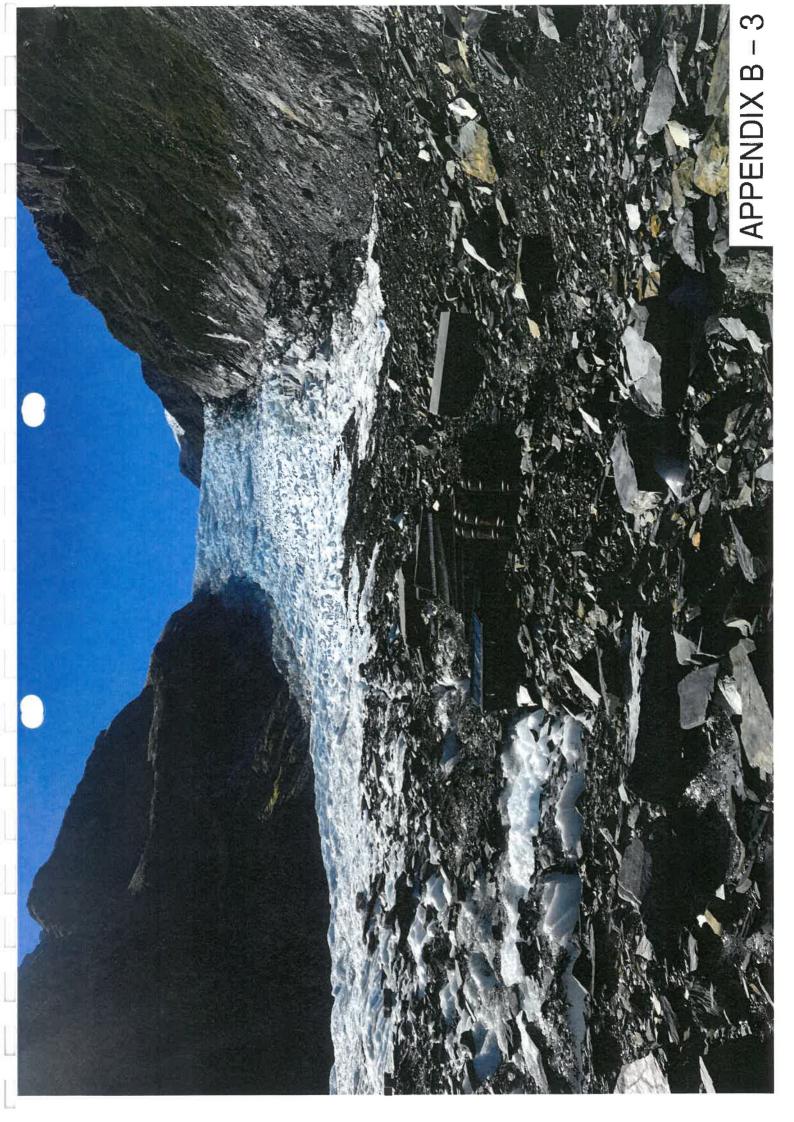
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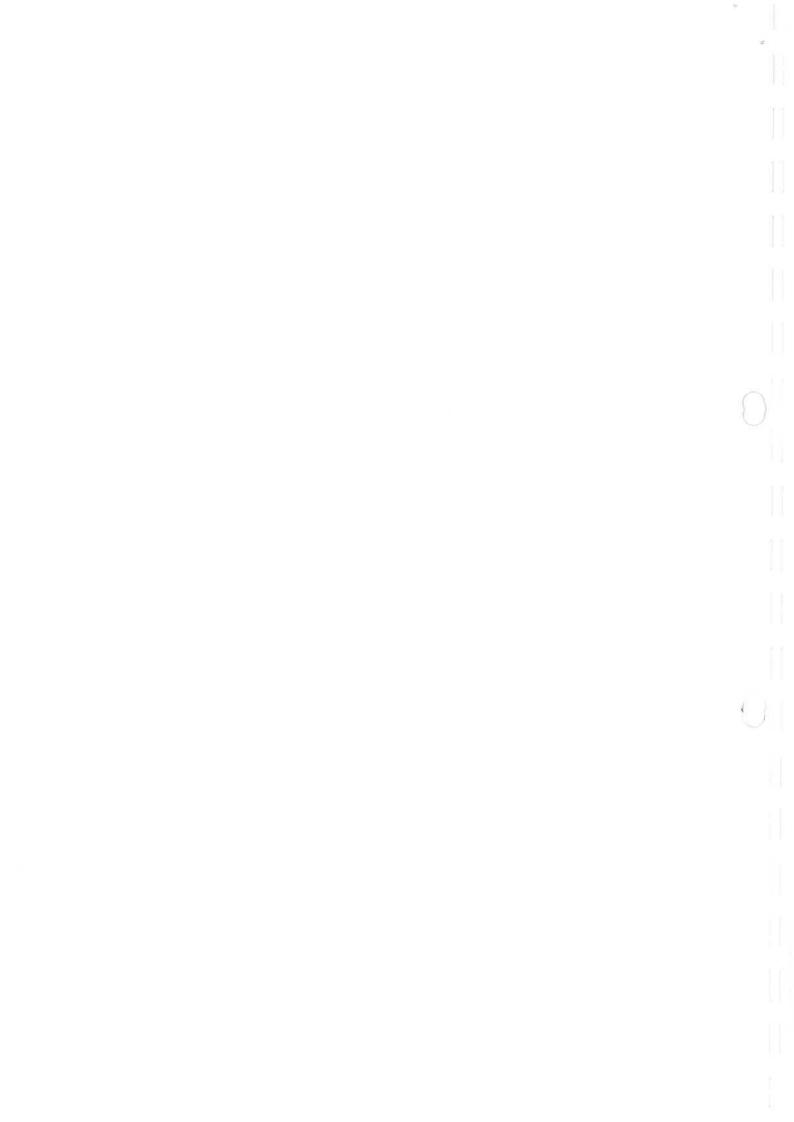


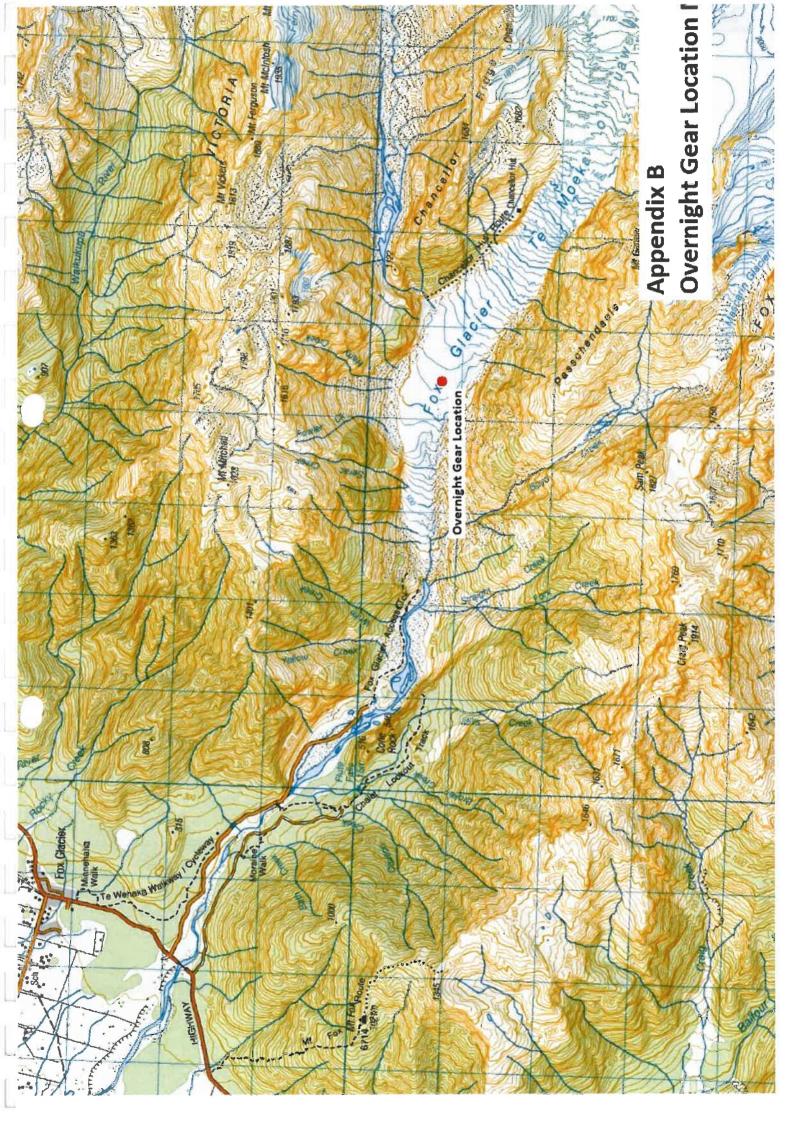
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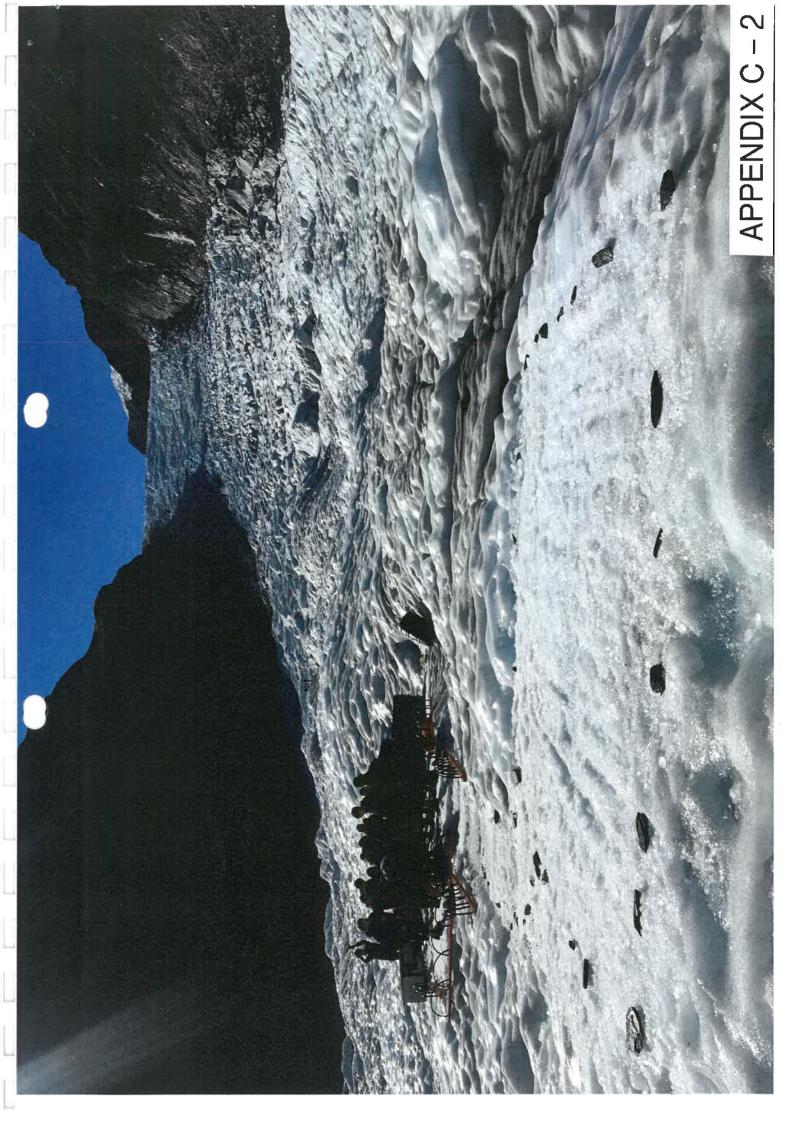




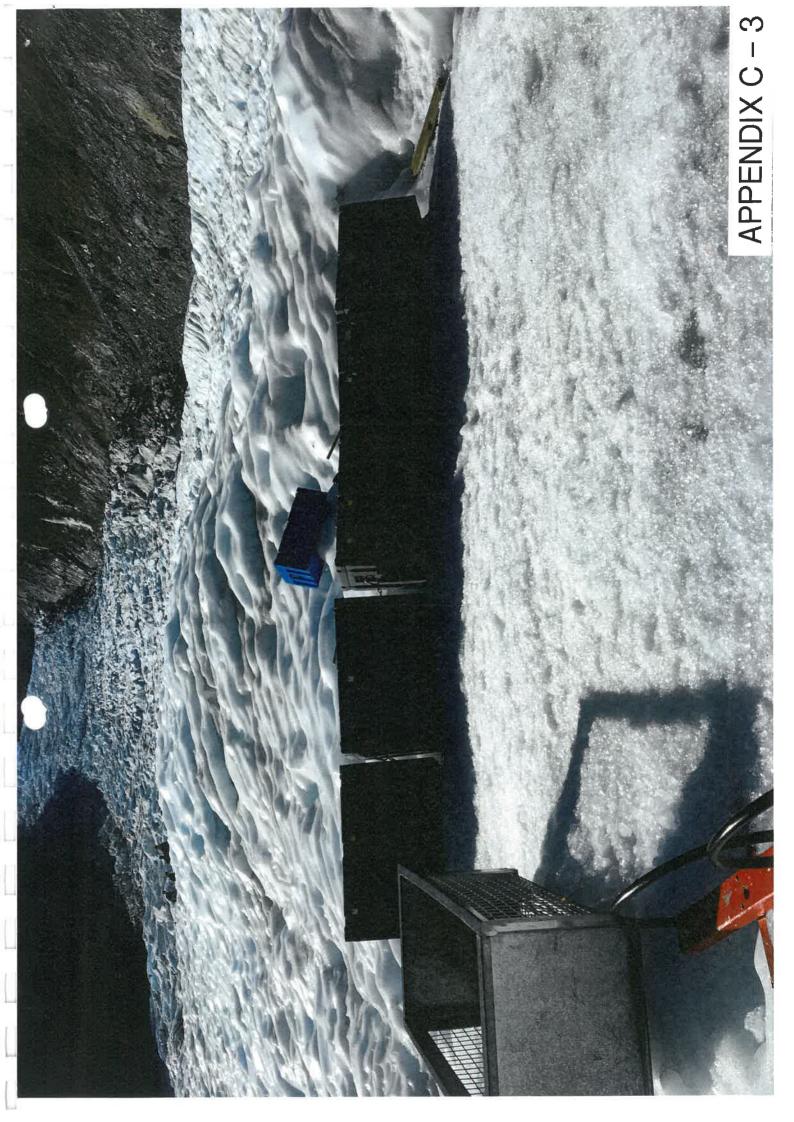




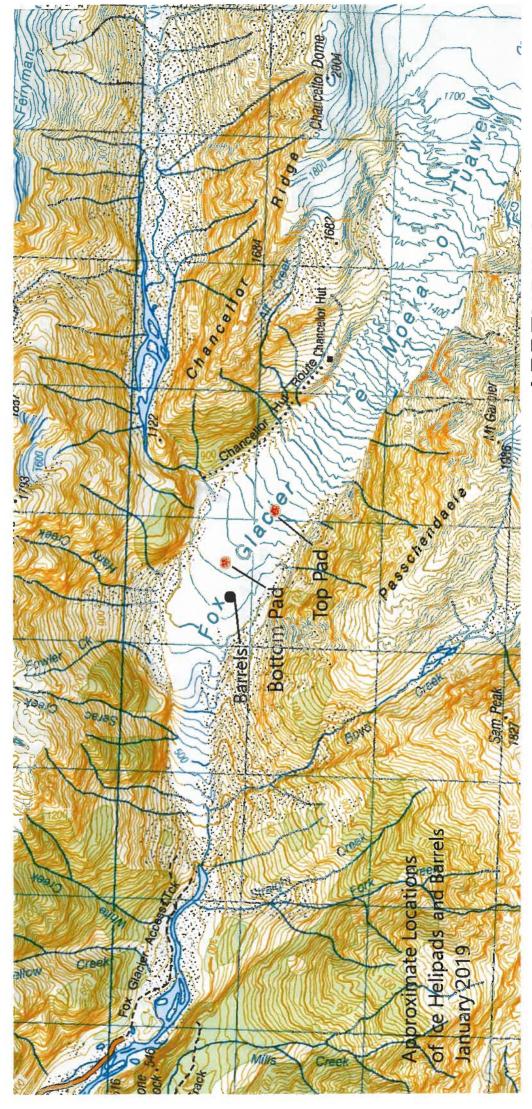




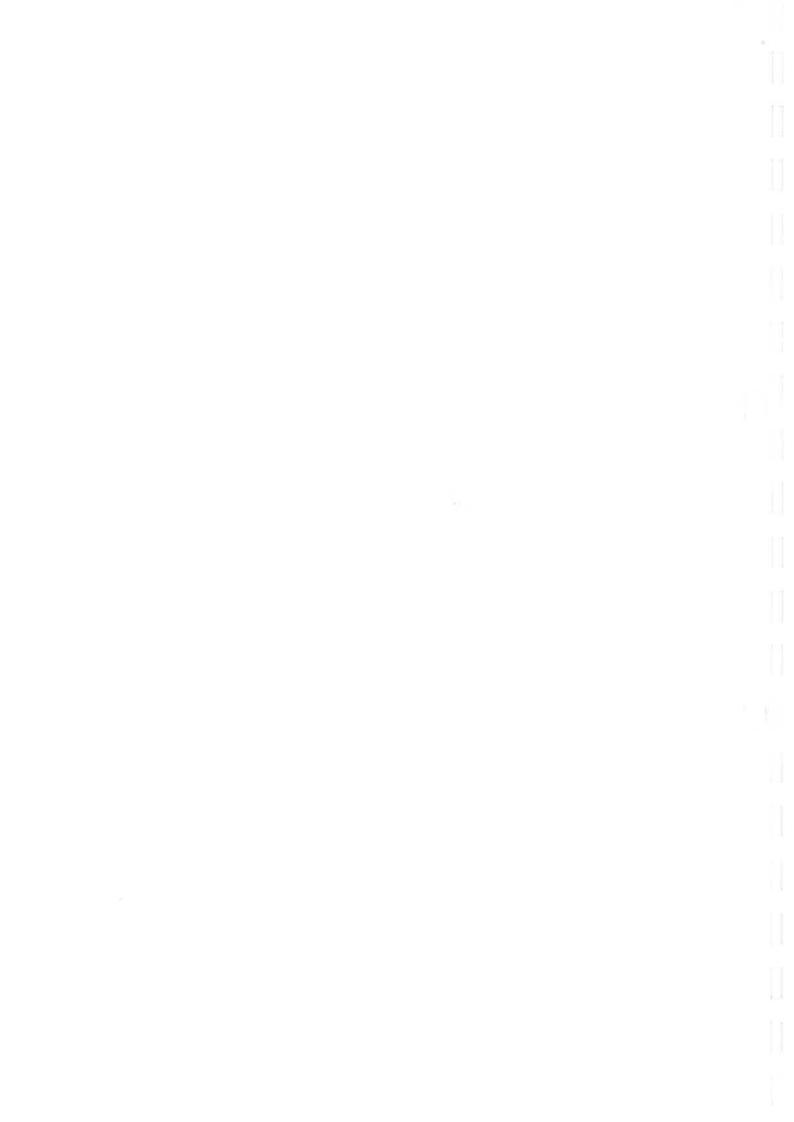
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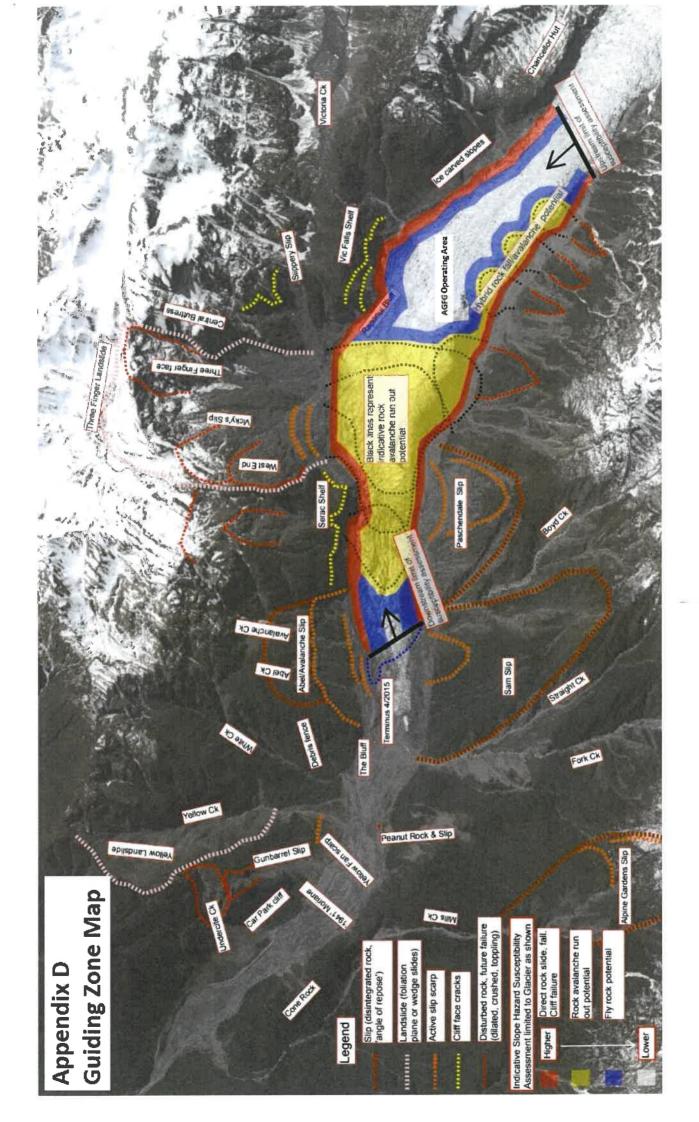


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APPENDIX C - Landing Pad







APPENDIX E - Slide 3

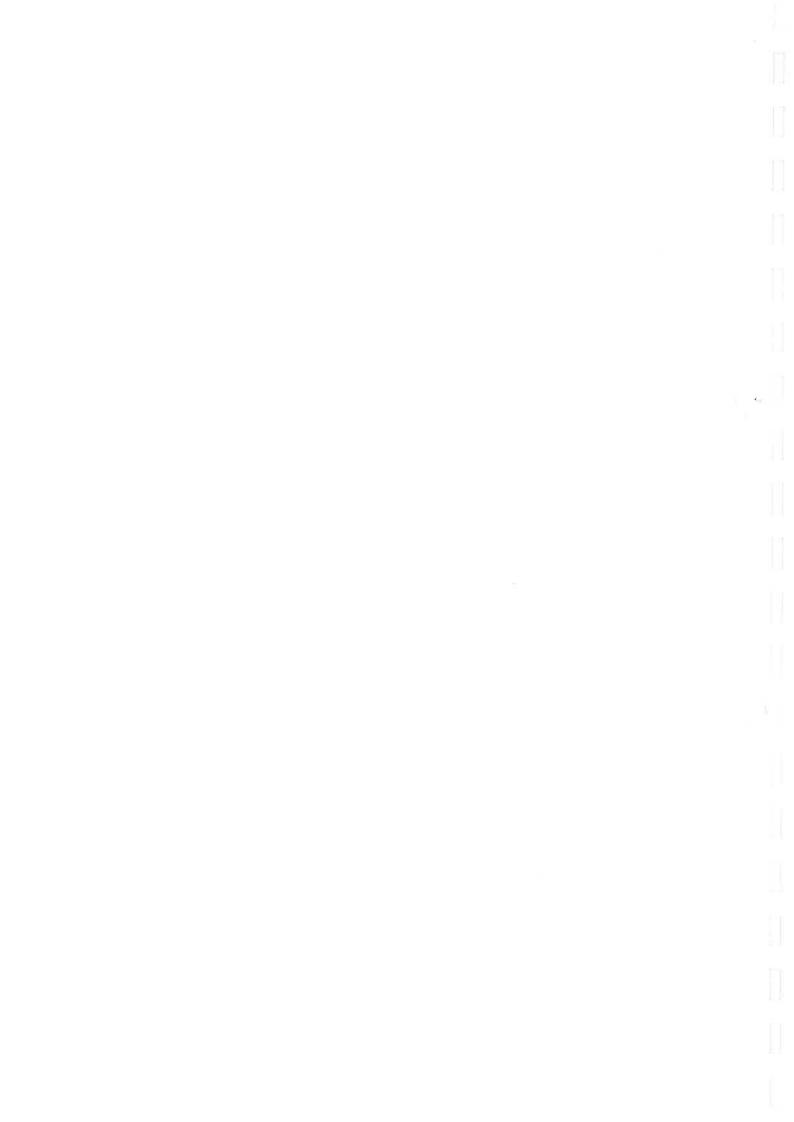
Please rate the quality of your experience with us in the following areas: **Customer Service Feedback**

| | Far Worse than Expected | | Worse than Expected | | As Expected | | Better than Expected | | Far better than Expected | ua u | Total |
|---|----------------------------|------|------------------------|----|-------------|-----|-------------------------|-------|-----------------------------|------|-------|
| For bookings reserved directly with Fox Glacier Guiding, the quality of service | 0.24% | 4 | 0.97% | 16 | 37.0% | 809 | 36.6% | , 109 | 25.2% | 415 | 1644 |
| The quality of service received from sales staff at check in was. | 0.39% | - | 171% | | 44.5% | 208 | 32.9% | 396 | 20.5% | 372 | 1813 |
| The quality of the pre trip briefing (which is intended to prepare you fully for th | 0.33% | 9 | 131% | 24 | 31.8% | 585 | 42.3% | 111 | 24.3% | 447 | 1839 |
| The quality of the information and education you received from the guides was | 0.71% | 22 | 1.30% | 74 | 16.2% | 862 | 37.8% | 169 | 44.0% | 810 | 1842 |
| The level of safety and risk management by the guides was: | 0.22% | 4 | 0.87% | 16 | 21.2% | 389 | 34.4% | 83 | 43.3% | 796 | 1838 |
| The friendliness, sense of fun and professionalism of the guides was: | 0.54% | 2 | 1.03% | 19 | 86.6 | 183 | 29.8% | 549 | 28.7% | 1080 | 1841 |
| The quality and range of equipment provided was: | 0.22% | 4 | %86.0 | 18 | 27.4% | 205 | 39.5% | 724 | 32.0% | 287 | 1835 |
| The amount of aircraft noise overhead while you were on the glacier was: | 0.84% | sa T | 4.21% | 22 | 46.3% | 826 | 27.3% | 486 | 21.4% | 381 | 1783 |
| Overall, the experience was: | 0.54% | 2 | 2.34% | 43 | 10.6% | 194 | 36.4% | 699 | 50.1% | 921 | 1837 |

Customer Feedback

During the trip did you feel at all crowded during any part of your visit?

| Answer Choices | | |
|--------------------|------|--------|
| Not at all crowded | 1260 | 89.89 |
| Slightly Crowded | 437 | 23.81% |
| Moderately Crowded | 113 | 6.16% |
| Extremely Crowded | 25 | 1.36% |
| | 1835 | |



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this occurred:

| Answer Choices | Responses | | |
|--|-----------|-----|-------|
| In the glacier car park | 18.18% | 16 | 6.87 |
| On the public track leading up to the glacier | 14.77% | 93 | 21.03 |
| At the rope barrier | 10.23% | 6 | 3.86 |
| On our private track leading up to the face of the glacier | 10.23% | 33 | 9.87 |
| On the glacier itself | 39.77% | 104 | 44.64 |
| Other (please specify) | 29.55% | Ľ | 30,47 |
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SILVER LEVEL OF CERTIFICATION

This is to certify that

Fox Glacier Guiding

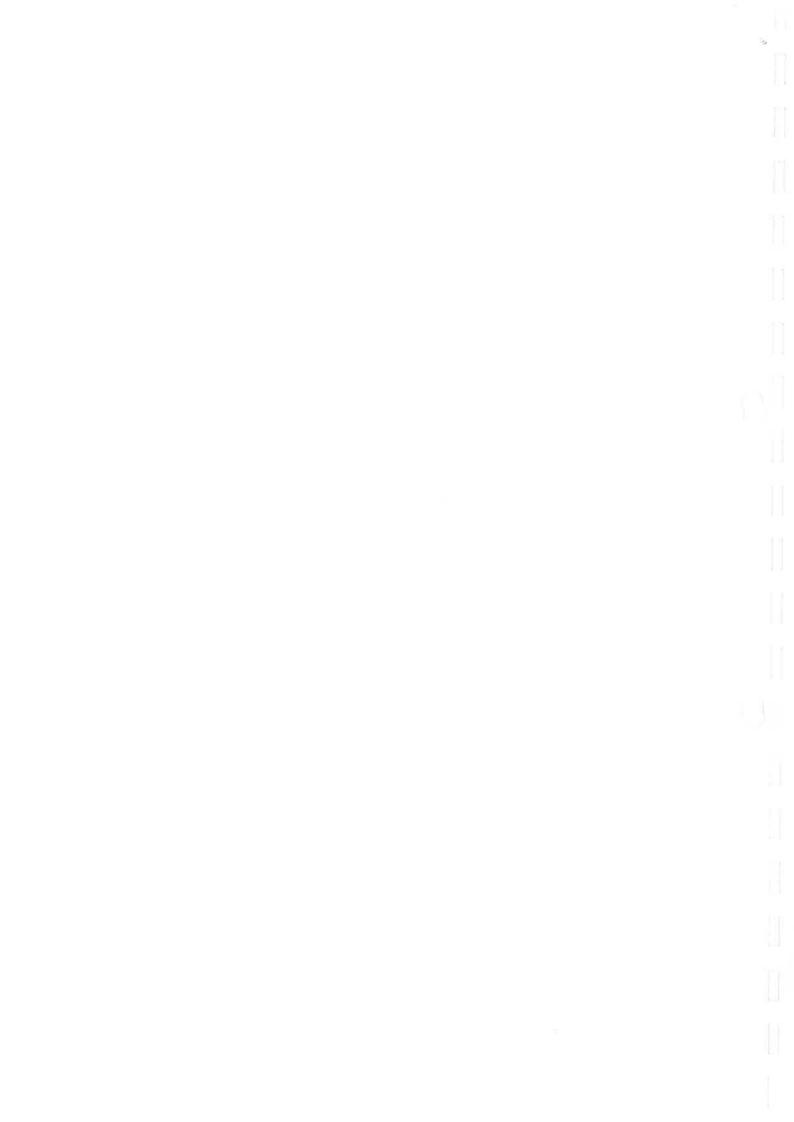
has been endorsed by Qualmark,
and awarded Silver under the Sustainable Tourism Business criteria.
The licence is held by Rob Jewell.

It has also been classified as:

Endorsed visitor activity

Date of evaluation: 06 July 2018 Gregg Anderson, General Manager Qualmark New Zealand Ltd





AdventureMark

SAFETY AUDIT CERTIFICATION

| This is to certify that ALPINE GUIDES FOX G Guiding and Mount Co | BLACIER LIMITED trading as Fox Glacier ok Glacier | | | | | | |
|--|--|--|--|--|--|--|--|
| At 44 Main Road, Fox Glacier | | | | | | | |
| has successfully demonstrated conforman | ce with the requirements of the | | | | | | |
| NEW ZEALAND SAFETY AUDIT STANDA | RD FOR ADVENTURE ACTIVITIES (2017) | | | | | | |
| and is certified to conduct the following ac | ctivities: | | | | | | |
| ADVENTURE ACTIVITY | LOCATION | | | | | | |
| Glacier Guiding, Mountaineering and Ice Climbing | Tai Poutini/Westland National Park | | | | | | |
| Glacier Guiding, Mountaineering and Ice Climbing | Aoraki/Mount Cook National Park | | | | | | |
| Ski Touring | Tai Poutini/Westland National Park Aoraki/Mount Cook National Park | | | | | | |
| Issue date 26 October 2018 | Expiry date 16 June 2021 | | | | | | |
| Original certification date 17 June 2018 Lemi Librate | Certificate number AAO 113 | | | | | | |



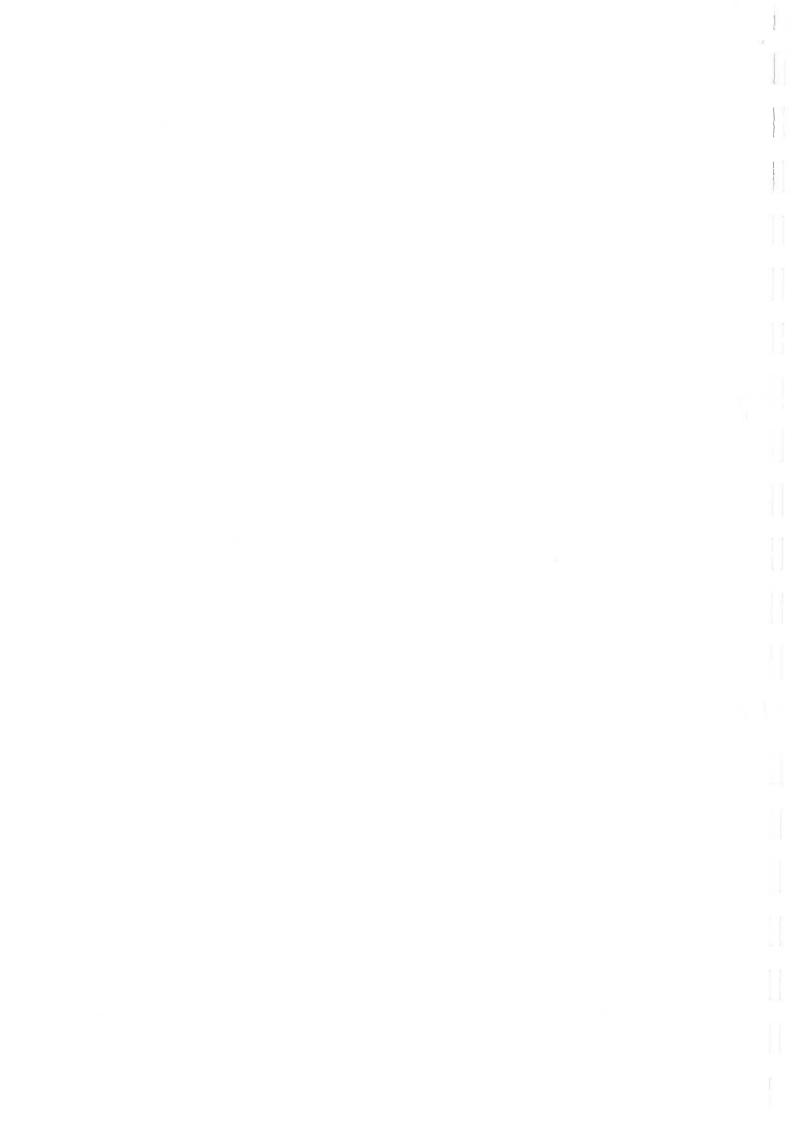
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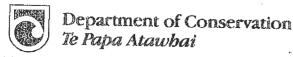
Hemi Morete

Certified by **AdventureMark®** Ltd and subject to **AdventureMark®** Ltd terms and conditions for certification, as detailed on **www.adventuremark.co.nz**

While all due care and skill was exercised in carrying out this safety audit, **AdventureMark®** Ltd accepts responsibility only for proven negligence. To verify that this certificate is current, please refer to the Worksafe NZ Register of Adventure Activity Operators.







22 November 2005

Marius Bron Alpine Guides PO Box 38 Fox Glacier

Dear Marius

USE OF A CHAINSAW ON FOX GLACIER

Further to my letter of 17 November regarding Alpine Guides use of chainsaws on the Fox Glacier, I have now considered further your request to continue using chainsaws as part of your track forming process in the long-term. I can advise that I authorise the use of chainsaws on the Fox Glacier by Alpine Guides Fox Glacier subject to the following conditions:

1 The saw must be used only by people who have a minimum of NZQA units 6916 (Demonstrate knowledge of the Code of Practice relating to chainsaw use), 6917 (Operate a chainsaw) and 43 (Maintain a chainsaw), or any units that may replace these in future.

Operators will wear steel toe capped boots, chainsaw chaps, helmet, eye and ear protection.

3 The saw must not be refuelled on the ice.

Fuel and lubricants for the saw must be securely stored in small quantities (max. 5L) off the ice.

No use of the saw after 9.30 a.m. on any day and must not be used within sight or hearing of the general public at the terminal face of the glacier.

The saw and all associated equipment is to be stored with a bar cover on and away from public view during the day.

When the saw is being transported to and from the glacier it is to be kept from public view by being carried in a bag or similar covering.

Bar lubricant must be vegetable oil based and not leave stains on the ice.

The chainsaw is not to be the first option for cutting. The saw is only to be used to establish notches and ledges and only then when Alpine Guides consider the time saved will be beneficial to both client and guide safety.

10 Use of the saw in front of the guided clients and the general public is to be avoided where possible.

11 That the current SOP will be amended to include these conditions and Alpine Guides will include the procedures in its overall guiding safety plan.

12 That should issues of safety or general public dissatisfaction becomes an issue, the Department has the right to suspend this agreement until the issue has been resolved.

If any of these conditions require clarification, please contact either myself or Kim Patterson.

Yours sincerely

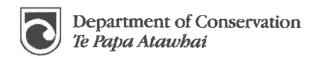
Mere Mokoraka

Area Manager

South Westland Webeka Area Office

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P.O. Box 9, State Highway 6, Fox Glacier, New Zealand Telephone 03-751 0807, Fax 03-751 0858 www.doc.govt.nz



19 June 2006

Marius Bron Alpine Guides PO Box 38 Fox Glacier

Dear Marius

EXTENSION TO HOURS OF USE OF A CHAINSAW

Thank you for your letter of 8 June 2006, requesting to extend the current hours of chainsaw use on the Fox Glacier. As outlined in your letter, I understand the conditions of the advancing glacier combined with the shorter winter daylight hours are resulting in the need for hours of use to be extended from the current 9.30am completion time. I hereby grant an extension to the hours that the chainsaw maybe used on the Fox Glacier to 11.00am for the months of May to August (inclusive).

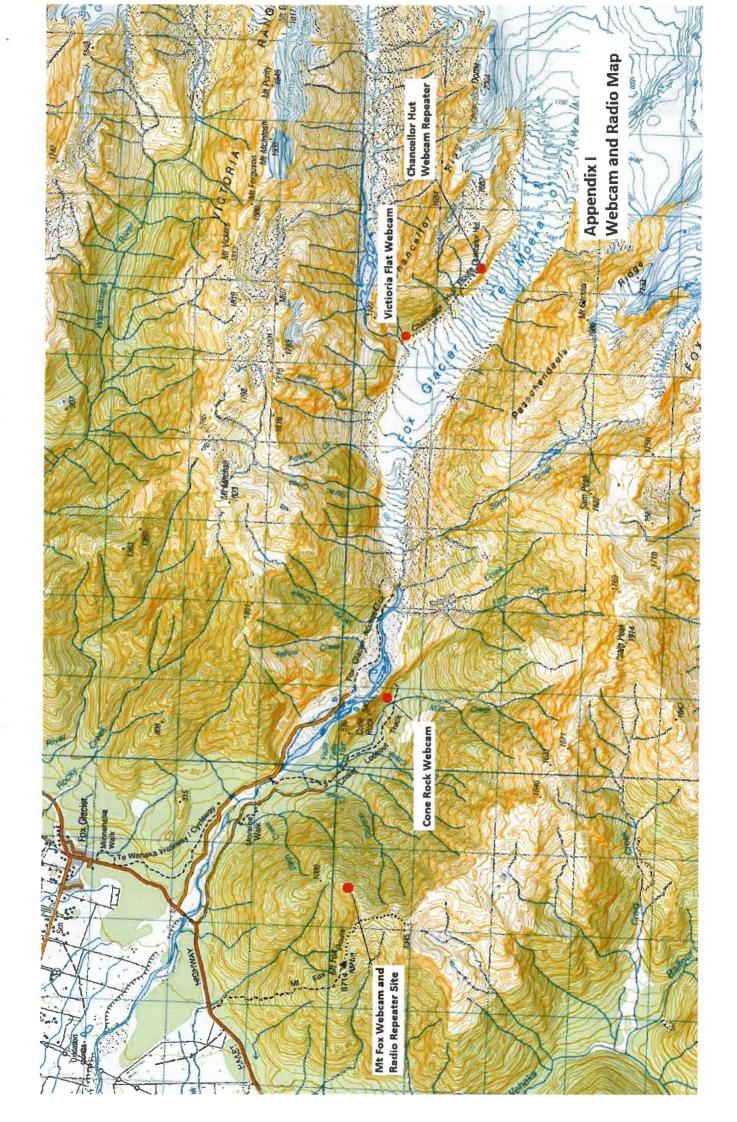
If you have any further concerns, please do not hesitate to contact me.

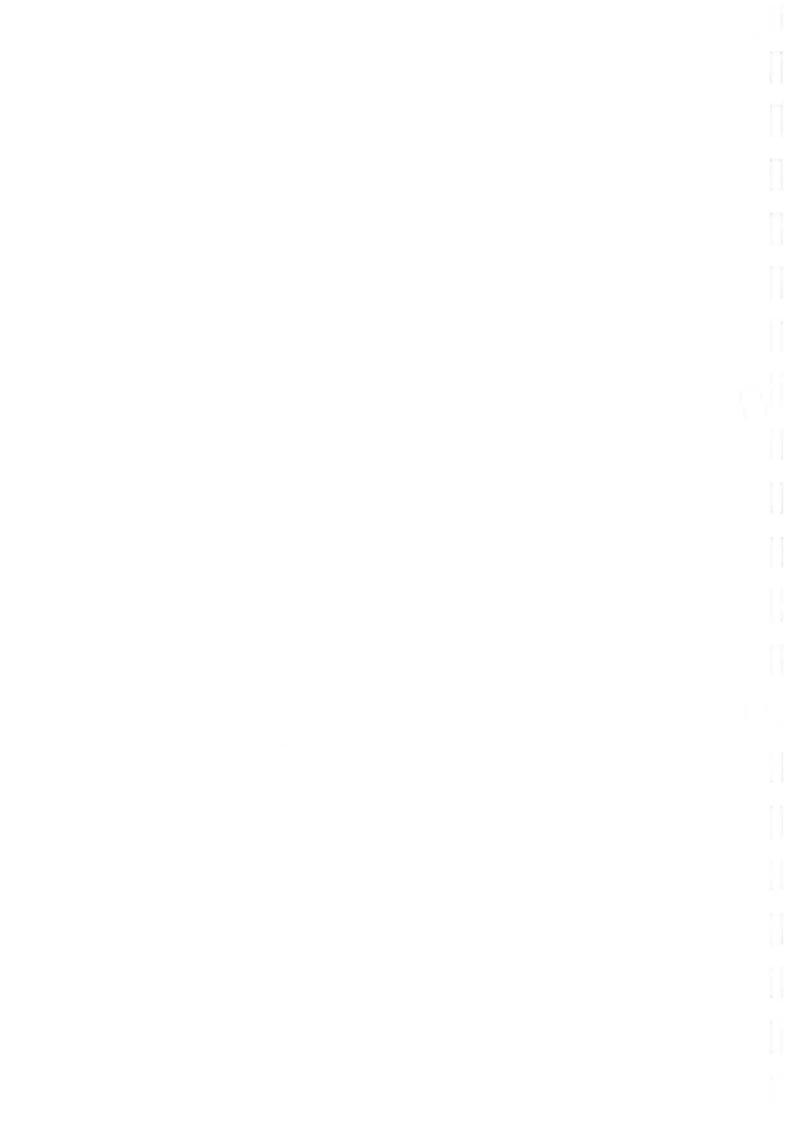
Yours sincerely

Mere Mokoraka Area Manager

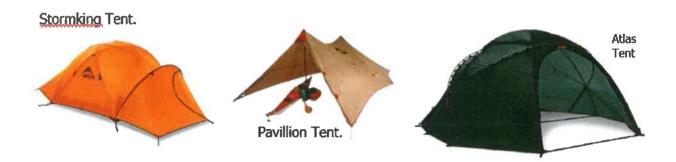
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Appendix J



The Operations Manager

Department of Conservation

PO Box 14

Franz Josef

Attention: Permissions Team/Wayne Costello

Application for Guiding Concession Licence

1. Introduction

1.1 Background to Concession

Alpine Guides Fox Glacier Limited ("AGFG") currently holds a concession to conduct public guided excursions on the Fox Glacier/Te Moeka o Tuawe; and to provide mountaineering, ski mountaineering and tramping guiding services in the Tai Poutini Westland National Park ("WNP") under **Guiding Concession WC/001/Gui**. The concession allows AGFG to use Park huts on a non-exclusive/non-preferential basis and to install a small emergency food locker in any of those huts, on an approved basis. The concession was varied in 2006 to include the ability to take commercial photographs of customers; and in 2017, to include a co-siting provision ("Guiding Concession"). AGFG has held the Guiding Concession since 1984 and it expires in 2024.

Date: 18 February 2019

AGFG also holds a related concession, which permits it to land 60 aircraft per day at Victoria Flat (only while no safe, reliable foot access at the terminal face is available) under Landing concession 39396-AIR. This concession was varied in December 2017 to allow AGFG to carry out 8 landings per day at Victoria Flat for the purpose of conducting helihikes (collectively referred to as the "landing rights concession").

Both AGFG's Guiding and Landing Rights Concessions are subject to the Concession Allocation in Limited Supply Agreement, entered into between the Department, the Tourism Industry Association and the Ministry of Tourism in July 2008 ("PRA Agreement").

This application seeks to replicate the rights conferred by the current Guiding and Landing Rights Concessions; and to include some minor additional rights, detailed in section 4 below. The application is made pursuant to the rights conferred by the PRA agreement.

1.2 Statutory Framework

1.2.1 WNP: Management Issues

Glacier Guiding: The challenge for the Department is to achieve an appropriate balance between allowing as many people to enjoy the park as possible, without adversely

Glacier Guiding: This policy relates to guiding on the Fox Glacier/Te Moeka o Tuawe below the 900-metre contour line. It contemplates the changing nature of the glacier environment and the cumulative effects of congestion, crowding and safety issues in all scenarios, whether the glacier may be advancing or retreating. It also requires that policy decisions should contemplate the need to get groups off the glacier when poor weather sets in or providing appropriate shelter for them on the glacier if the concessionaire can't evacuate people safely.

2. Proposed Activity

2.1 Guiding Products

2.1.1 Products accessed from the valley Floor

The first three products described below are not currently offered by AGFG. In 2014, when environmental conditions in the Fox Glacier valley changed, access on to the ice from the valley floor, became unsafe. Accordingly, only Terminal walks are currently being offered.

However, all product descriptions are included in the application because AGFG will seek to re-institute guided trips from the valley floor if environmental conditions change again to afford safe reliable foot access.

Half Day – approximately 3.5 hours duration and 1-hour ice time; up to 8 departures per day between the hours 8am and 7pm (summer) and 9am and 5.30pm (winter). Maximum 2 guided groups per departure. Guide to client ratio is 1:15

Full Day – approximately 7 hours duration and 4 hours ice time; up to 6 departures per day between the hours 8am and 6pm (summer) and 9am and 5pm (winter). Maximum 2 guided groups per departure. Guide to client ratio is 1:12

Ice Climbing – approximately 9 hours duration and 6 hours ice time; up to 2 departures per day between the hours 8am and 5pm (summer and winter). Maximum 4 guided groups per departure. Guide to client ratio is 1:4

Terminal Walk – approximately 2 hours duration; 8 departures per day between the hours 7am and 7pm (summer) and 8am and 4pm (winter). Maximum 3 guided groups per departure. Guide to client ratio is 1:15

The WNP Plan currently allows up to 450 customers per day to be guided on the Fox Glacier from the valley floor. Before ceasing operations in 2014, whilst AGFG never reached capacity, it did come close at the height of busy summer periods.

2.1.2 Products Accessed by Helicopter

The following products are currently offered by AGFG.

Heli Hike – approximately 4 hours duration and 3 hours ice time; 9 departures per day between the hours 6.30am and 3pm (summer) and 7.30am and 2pm (winter). Maximum 3 guided groups per departure. Guide to client ratio is 1:11

- 7 x 200 litre barrels & 3 x 400 litre boxes. Stored in these are tents, food, stoves and pots, LPG cooking gas, sleeping bags and mats. All of this is emergency equipment for shelter, food and warmth;
- 2 Portaloos, full containment type, for toileting. The location and photos of this gear is set out in Appendix B.

Permission to store this equipment has never been expressly included as a term of AGFG's concession, but has always been permitted by the Department, for safety and operational reasons.

AGFG also keeps a locker at Chancellor hut in which it stores overnight equipment (i.e. stoves and cooking equipment as well as sleeping bags). This is done with the permission of the Department.

Tracks: To conduct guiding safely, AGFG is required to form and maintain temporary track structures on the ice. This ensures good route selection and mitigates safety risk. Because of the nature of the glacier (moving and melting) the tracks require daily maintenance and/or reconstruction. Mostly the tracks require cutting of ice steps, placement of handlines and ropes and on occasion, installation of temporary bridges (using aluminium ladders). The tracks are prepared by guides before the trips start for the day and maintained by guides using them.

Prior to 2014, on the lower glacier, AGFG also built tracks to allow access onto the glacial ice. The locations would depend on ice conditions at the time. At times, the routes could be established directly from the valley floor on to the ice; and at other times, walking tracks and steps would be cut in the hillside on the true right side of the glacier, to allow access from the side. None of these tracks are currently in use.

Landing Pads: AGFG operates up to two helicopter landing pad structures at Victoria Flat, currently located at the positions set out in Appendix C. Two pads allow AGFG to maximise efficiency and deliver a better, safer, customer experience. The pads are carved from the ice. Appropriate terrain is identified; a flat landing pad is cut; stones and other debris are removed; and the ice is chipped to provide grip on the pad for both helicopters landing and people walking on it. For safety reasons, AGFG also uses several barrier structures to direct customers from the helicopter to the safe assembly area. Like the formed ice tracks, landing pads require constant maintenance; and periodically need to be relocated. AGFG has the permission from the Department to use chainsaws as and when required (letter of permission attached in Appendix H) Located at each landing pad are 6 crampon storage boxes. Photos are set out in Appendix C.

Logistics: The issuing of customer equipment and safety briefings takes place at the AGFG base building. Helihike customers are then transported by bus to the helicopter operator's hangar; and transported to the glacier by way of a short 6-minute flight. Terminal walk customers are transported by bus to the Fox Glacier valley car park. AGFG generally only has one bus in the car park at any time (under current glacier conditions i.e. no safe reliable foot access).

2.3 Filming

This means it is a high-profile, popular destination that is managed to support the growth of domestic and international tourism and provide memorable visitor experiences in New Zealand.

4. Type of Concession for which applicant is applying

AGFG seeks a concession in the form of a licence:

- 1. To carry our guided trips on Fox Glacier/Te Moeka o Tuawe below the 900 metre contour lines and on the valley floor;
- 2. To provide mountaineering, ski mountaineering and tramping guiding services in the Tai Poutini Westland National Park (WNP);
- 3. To use Park huts subject to reasonable conditions the Department may impose; and to install an AGFG locker in Chancellor Hut;
- 4. To take commercial photographs of customers;
- 5. which includes a co-siting clause;
- 6. To carry out 8 aircraft landings per day at Victoria Flat for the purpose of conducting helihikes and to carry out a further 60 aircraft landings per day at Victoria Flat only when no safe reliable foot access is available on the lower glacier;
- 7. to install, maintain and operate webcams at Cone Rock and Victoria Flat (and associated repeaters at Mt Fox) or in any other location in the Fox Glacier Valley as agreed from time to time with the Department;
- 8. to store emergency equipment barrels and portable toilets on the glacier in a manner agreed with the Department. Note, the equipment is stored for safety and emergency purposes including if customers get trapped on the glacier overnight;
- 9. to carry out film work within the boundaries of its concession operating area, for marketing and promotional purposes;
- 10. to host overnight camping trips at Victoria Flat, for a maximum of 14 pax (2 guides, 12 customers).

It should be noted that the matters listed in 1-6 above are terms already contained in AGFG's existing concessions. This application seeks to repeat those terms in the proposed new concession.

Items 7 and 8 are currently permitted in the existing concession regime, not as a strict term of the concession, but by side agreement with DOC. AGFG considers these are both critical to the safe operation of its business. It seeks to formalise them into the new concession to avoid the need to make formal applications to the Department throughout the period of the concession term and create unnecessary administration for both parties.

Assessment". Also, Fox Glacier *Te Moeka o Tuawe*, is recognised in the Conservation Management Strategy Appendix 6 as a site of International Scientific Importance with a vulnerability rating of 3, meaning it is unlikely to be damaged by humans.

In other words, the Department has recognised that the proposed activity will have little physical impact on the natural environment. It is submitted that the key potential impact will be social.

5.2 Geographic: Fox Glacier/Te Moeka o Tuawe is a dynamic landscape and changes continuously. The ice moves at a rate of approximately 1 metre per day – melting, freezing, advancing, receding, with ice breaking off, moulins being created and rock fall occurring. AGFG cuts tracks and landing pads on the ice, but these structures represent a very temporary impact on the landscape. A few days of ice melt and these structures entirely disappear.

Overall, AGFG's physical impact on the glacier is minor to negligible.

- The only equipment and structures stored on the glacier includes emergency equipment barrels at Victoria Flat and barriers for controlling customers at landing pads. These are stored out of sight of customers.
- AGFG stores portable toilets on the glacier. These are for "emergencies" and are not used a lot in practice. Customers are encouraged to use toileting facilities before they leave town. All human waste is removed in sealed cartridges.
- Structures and facilities include tracks and landing pads, all of which are cut into the ice and eventually melt away. Some temporary bridge structures (aluminium ladders) are used to allow customers to cross crevasses. AGFG minimises use of these where possible, by finding alternative routes.
- None of the structures or facilities can be seen from the glacial valley and arguably, not from the air either, except when aircraft are coming in to land. Overall, the physical and visual aesthetic impact is very low.
- AGFG checks for and collects any rubbish that might be dropped by customers as part of its daily maintenance schedule.

The glacier valley is also dynamic. It rests on a major fault line and is constantly releasing rock fall into the valley which was once a solid mass of ice. The Fox river is created by glacial and snow melt and by rainfall collection from a large catchment in one of New Zealand's highest rainfall locations. The river deposits transient glacial moraine into the glacier valley and like the glacier, the valley floor is constantly changing. Human effects have little permanence.

AGFG uses the public track to access the terminal face of the glacier. The track is hard packed and requires repair or re-establishment from time to time as the glacial valley changes and rock fall or flooding cause damage. AGFG's physical impact on these tracks is nil to negligible.

The upper neve is in a Remote Experience management setting and is relevant to AGFG's Chancellor trips. The WNP Plan provides there is a high probability that visitors will experience isolation from the sights and sounds of humans and experience a closeness to nature. Group sizes are usually small and generally do not exceed eight people. Visitors may expect limited interaction with other groups in this zone within any one day.

These settings provide the context for considering the social effects of the proposed activity.

5.4.2 Visitor Experience: Nearly five hundred thousand visitors per annum visit the Fox Glacier every year. Some seek only a remote view of the glacier, some will walk to public lookout points from the valley car park and some will opt for a guided trip onto some part of the glacier. All visitors interact in some sense and have a social effect on one another.

The potential adverse social effect on visitors is recognised and AGFG understands it has an obligation to mitigate these.

5.5 Mitigation:

- **5.5.1 Front country with facilities setting:** Currently, AGFG only offers Terminal face walks in this setting (for reasons explained above). Approximately 5000-6000 customers purchase this product each year. This constitutes about 1% of the total estimated 500,000 valley walkers per annum. Also, because all visitors to the valley either walk as freedom walkers or take an AGFG trip, it is likely that any customer acquired by AGFG merely displaces a freedom walker in the valley. In other words, the net social effect of AGFG activity is minor to negligible.
- **5.5.2** Back country with facilities setting Lower Glacier Walks: When day walking on the lower ice was possible, AGFG guided, at the peak, approximately 46,000 visitors per annum, 9% of the overall numbers walking in the valley. In the context of this social impact, AGFG notes the following:
 - The valley floor is an intense interest site, so a high level of interaction is expected;
 - Group size for day walking was a maximum of 15. No large groups were guided;
 - All visitors to the valley either walk as freedom walkers or take an AGFG trip. It is likely that any customer acquired by AGFG displaces a freedom walker in the valley. In other words, the net social effect of AGFG activity is negligible; and indeed AGFG groups were spread out throughout the day;
 - As AGFG walking groups arrived at the terminal face, they literally disappeared into the bush, to be guided up the AGFG formed tracks. The impact of these groups at that point, on other visitors to the park, was minor to negligible;
 - AGFG managed both group timing and access routes to ensure that in most cases, groups minimised their contact with each other.
- **5.5.3** Back country with facilities setting Helihiking: This takes place at Victoria Flat. The key potential adverse effects can be from guiding (customers may feel crowded or congested because of other AGFG customers) and from aircraft noise (the noise can detract from the amenity values of quietness and remoteness for other visitors). We deal with each in turn.

per day for helihiking and 60/60 of the additional permitted rights when foot access is not available onto the lower glacier. By this application it seeks to replicate those same rights.

The survey data in Appendix E shows that customers are currently satisfied with overhead aircraft noise while they are on the glacier (Slide 3) and that they do not feel crowded during the trips (Slide 4). While AGFG continues to work in these areas to improve the results, it considers overall, customer satisfaction is high.

There is no suggestion that AGFG is in breach the 25% annoyance threshold and it accepts that appropriate mechanisms are in place to address any breach of the threshold should it arise in the future. To this extent AGFG considers appropriate mitigation measures are already effected by the current WNP and concession structure.

5.5.3 Remote Experience setting: AGFG carries out approximately 15 Chancellor Trips per annum, with an average group size of 3 It is a niche offering and well within the bounds of the levels contemplated by the WNP Plan. The social impact is minor.

6. Proposed duration of the Concession

6.1 Term: AGFG seeks a term of 20 years for this concession.

6.2 PRA Agreement: The PRA Agreement provides:

- that in recognition of the realities of running a business, the rate of return, and in order to encourage investment and improvements in such operations, Limited Supply Concessions should have a standard term of 15 or 20 years, with five yearly reviews of all conditions. 15 years for activities such as guided walking, kayaking, etc; 20 years for activities involving larger capital investment, such as buses, aircraft, boats etc.
- terms may be longer where significant infrastructure is located on public conservation land; up to 30 years where significant infrastructure is involved e.g. campgrounds, hotels, ski fields; or up to 60 years in 'exceptional circumstances', as provided for in the Conservation Act 1987.
- while these terms are preferred, the term of every concession is at the discretion of the decision maker.

The Department has recognised that both the guiding and landing rights concessions form part of the PRA Agreement. It did so when it issued Franz Josef Glacier Guides a guiding concession under the PRA process; and Glacier Helicopters a landing rights concession for 17 landings per day at Victoria Flat for the purposes of servicing helihike business.

It is clear from the PRA agreement that AGFG is entitled to a minimum term of 15-20 years. AGFG considers 20 years is appropriate for the following reasons:

6.2.1 Capital Investment:

It requires a significant amount of capital and infrastructure to operate AGFG. The base building which it owns and operates, is valued at \$2.5 million and currently requires a further capital injection to keep it current and able to meet the demands of its customers; and the 16 houses/units that it or its shareholders own and supply for staff housing, have a

It is acknowledged that checks and balances can be included in the concession contract through review clauses, to ensure that quality and environmental standards are maintained and that AGFG remains compliant with concession terms.

6.2.3 Investment in the Community:

AGFG has chosen not to take the concession privileges it has for granted, but rather to take a long-term view of its place in the community and invest back in it. It also promotes and facilitates a culture of "giving back" amongst its staff, which compounds the effectiveness of the community work AGFG carries out.

The contribution AGFG makes has significant monetary value, but perhaps more importantly, delivers important (and some critical) services to the community. The Fox Glacier community would be crippled without its Ambulance, Fire and Search and Rescue services. An extended secure tenure for AGFG will benefit local residents through on-going support for these services, without which, there would be serious negative consequences for the Fox Glacier community.

Detail of this contribution is set out in 7.3 and 7.4 below.

AGFG also contributes significantly to the local Fox Glacier consumer economy, with shops, restaurants and bars all supported by the business and its staff. The extent of AGFG's contribution is particularly significant because it makes up such a large proportion of the local economy. It follows that the impact of a withdrawal of services by AGFG, would also have a very significant impact on this community, much more so than say in a bigger town like Franz Josef, where no single business has the same dominant impact on the town.

If AGFG were not concessionaire, or only had an expectation of short tenure, not only might support for critical services be withdrawn, but there would be a broader impact on consumption (if say large parts of the business were managed from a different city); lower local employment opportunities; potential impact on the school role and potential impact on housing values. This dynamic is arguably unique to AGFG and Fox Glacier and forms part of the rationale for this application.

AGFG considers that the nature of the investment made and the critical nature of the services to the community, constitutes a "specific local issue" (as defined in the PRA Agreement) which warrants the suggested approach to the granting of a 20-year concession term. AGFG considers it is reasonable to expect that its contribution and the impact on the community if it were to lose the concession or only be granted a short term, be recognised by the granting of a term which reflects the long term view it has adopted.

6.2.4 Quality Operation:

The statutory framework for management of the WNP Plan provides that the Department must allow as many people to enjoy the Park as possible, without adversely impacting the visitor experience (including minimising conflict, congestion and crowding) or the natural appearance of the glaciers. In addition, people must be kept safe.

By this application (including in section 7.3 below), AGFG considers it demonstrates how it supports the Department to deliver its objectives - by taking a partnership approach; by

7. Other relevant Information Relating to the Applicant

7.1 Concession and Statutory Compliance

AGFG has never breached any term of its concession, or any provision of the related legislation.

None of AGFG's owners or key employees have ever had a criminal conviction or infringement action taken against them under the Conservation Act or associated Acts of Parliament.

7.2 Keeping People Safe

AGFG has an outstanding safety record. Since 1974, it and its predecessor have guided more than 1.3 million customers, in an extremely hazardous environment, with no fatalities and only two serious injuries. While AGFG always aims for zero harm, it submits this is an impressive record.

The safety system which delivers results of this magnitude is sophisticated, complex and is made up of many parts:

- Technical Training: AGFG sets high standards for technical training. All guides are trained to meet the minimum guiding standards set out in AGFG's Safety Management System and in doing so, follow a pathway to a New Zealand Mountain Guides Association (NZMGA) Hard Ice Guide (HIG) qualification. The full training process takes about 2 years. AGFG encourages (and funds) guides to seek qualifications beyond the basic requirements to guide on Fox Glacier; and financially supports guides to undertake offshore adventures in the off season, in the hope that they will travel, develop their skills and return, stronger guides for the experience.
- Guiding Culture: With his early training as a mountain guide with some of NZ's "greats", Mike Browne (founder of Alpine Guides Fox Glacier 1974 and remains a shareholder and Director) brought a set of core values to the industry of glacier guiding humility, respect for the environment and respect for those that have guided before us. These values remain entrenched in the culture of AGFG:
 - Knowledge is passed down: The early West Coast guides (including Peter McCormack, Harry Ayres and Frank Alack) were regular visitors to Fox and Mike ensured their knowledge and wisdom was passed down to his team. This culture endures, with long serving guides continuing to return, for short or long stints of guiding, to pass on their knowledge and wisdom. Some, like Gary Dixon, an International Mountain Guide, return regularly to Fox, to train and assess the next generation of guides.
 - Continuity of stewardship: Staying true to its values is assisted by Mike and Carrol's continuity of ownership; as well as AGFG's ability to retain key staff over the long term (Rob Jewell, AGFG's CEO, has been with the business for

(at no cost to the Department). AGFG staff manage safety on these trips and assist with the not particularly pleasant work. This is notwithstanding AGFG does not guide in this area;

- Hut Inspections: AGFG staff accompany Department staff on regular hut inspections, throughout the Park, outside of AGFG's operating area, providing guiding and safety management services (at no cost to the Department);
- Chancellor Hut maintenance: AGFG is largely responsible for all maintenance work carried out at Chancellor Hut (AGFG's contribution at no cost);
- Helicopter Services: While the helicopters used to carry out the work mentioned above are typically paid for by the Department, the Department will sometimes 'piggy back' on helicopter services paid for by AGFG. It should be noted that it is AGFG and not the helicopter company concessionaires, who fund these flights;
- Webcam: The current webcam at Cone Rock cost approximately \$15,000 to install and AGFG contributed 50%. The webcam gives the Department and other aircraft users of the Park access to real time footage of the glacier, allowing them to monitor changes to the glacier environment and make better weather calls. All maintenance work on the webcam is carried out and paid for by AGFG. The webcam installed at Victoria Flat in 2018, at a cost of \$20,000, was 100% funded by AGFG. The Department has access to camera images at no cost. The ongoing maintenance and data costs are funded by AGFG at an estimated cost of \$3,000 per annum.
- Conservation Governance: One of AGFG's Shareholder Directors, Mike Browne, has served on the Boards of both The West Coast Conservation Board as well as the New Zealand Conservation Authority.

7.4 Contribution to the Fox Glacier/West Coast Community

In addition to the work it does with the Department, AGFG also makes a significant contribution to the West Coast Community.

AGFG employs more than 60 people at the height of each season (20% of the population of Fox Glacier) and spends \$400,000 per annum on marketing AGFG, Fox Glacier and the West Coast region to the world. Local businesses directly benefit from this marketing investment.

Furthermore, AGFG and its staff are actively involved in the local community:

- **Fire service**: Currently, two of AGFG's senior staff are volunteer fire officers at Fox Glacier. Volunteers give up their time. AGFG contributes by paying staff full wages for call outs (estimated cost to AGFG \$6,000 per annum).
- Ambulance service: 4 out of the current 6-7 ambulance volunteers at Fox Glacier are AGFG staff. Volunteers give up their time. AGFG contributes by paying staff full wages for call outs (estimated cost to AGFG \$10,000 per annum).
- Search and Rescue: Almost the entire South Westland Search and Rescue team and Alpine Cliff Rescue team are made up of AGFG staff. Volunteers give up their time. AGFG contributes by paying staff full wages for call outs and allows the SAR team to use its technical equipment (estimated cost to AGFG \$25,000 per annum). AGFG also recently donated \$10,000 to help build the emergency services building at Fox Glacier.

In total, AGFG has contributed \$70,000 towards one-off projects over the last three years. It also contributes on an ongoing basis, an estimated \$75,000 per annum to the Fox Community (as detailed above) because it values its long-term place in the community.

Perhaps as significant as the direct financial contribution made by AGFG, is that AGFG enables its staff to give up their own time to contribute to the community. A culture of "giving back" is promoted and some job flexibility is provided to facilitate these personal contributions. The level of combined contribution far exceeds that of any other commercial tourism business on the West Coast. The benefit to the community is profound and demonstrates an extremely high level of corporate social responsibility. AGFG considers this factor relevant to this application.

8. Conclusion

AGFG has demonstrated by this application that it takes a long-term view of its place in the Fox Glacier and Department of Conservation communities and has invested and continues to invest accordingly. It seeks 20-year concessions on the terms set out in section 4 above.

Please do not hesitate to contact the writer if you have any questions.

Regard

Rob Jewell

CEO

Fox Glacier Guiding

Appendix A: Daily Trip Schedule for Products Currently Offered

Appendix B: Photos and Location of Equipment on the Ice

Appendix C: Landing pad Location

Appendix D: Guiding Zone Map

Appendix E: Customer Survey Results

Appendix F: Qualmark Endorsement

Appendix G: Adventure Activities Regulations Certificate

Appendix H: Chainsaw approval

Appendix I: Webcam map

Appendix J: Photos of tents



Applicant Information Form 1a Notified or Non-notified process

We recommend that you contact your usual permissions advisor, or the <u>appropriate Department of Conservation Office</u> to discuss the application prior to completing the application forms - see appendix for contact details.

Please provide all information requested in as much detail as possible. Applicants will be advised if further information is required before this application can be processed by the Department.

This form must be completed for all longer term applications (ie not one-off applications), then please fill in and attach the form(s) for the activities you wish to undertake. If extra space is required for answering please attach and label according to the relevant section.

Once you have filled in your application form, please complete this checklist to ensure that all components of your application form are complete. This will help prevent any possible delays in the processing of your application:

- € Legal status registration number (if not an individual)
- € Written testimonials (if required)
- € Written consultations (if applicable)
- € All appropriate activity application forms for concessions we require the applicant information form **and** relevant activity form(s)
- € Supporting evidence for Environmental Impact Assessment (if required)
- € Supporting information and detail including maps, site plans, building plans as required in activity forms. **Note some applications require GPS Co-ordinates**
- € Supporting evidence for details of activity forms
- € Have you read the section regarding the liability of the applicant for payment of fees?
- € Have you signed your application?

All efforts in putting together a detailed application are greatly appreciated and will allow the Department to effectively and efficiently process your application.

A. Applicant Details

Applicant Name (full name of registered company or individual)

Alpine Guides Fox Glacier LTD

Legal Status of applicant (tick)

Individual

Registered Company

Trust

Incorporated Society

Other (please specify full details)

Please supply the company, trust or incorporated society registration number: 1688836 If an individual please supply your date of birth (this is a unique identifier for you):

Trading Name (if different from Applicant name)

Fox Glacier Guiding

Postal Address

P O Box 38, Fox Glacier 7859

Street Address (if different from Postal Address)

44 Main Road, Fox Glacier 7859

Registered Office of Company or Incorporated Society (if applicable)

Crowe Horwath, 13 Camp Street, Queenstown

Phone

03 7510 825

Website

www.foxguides.co.nz

Contact Person and role

Rob Jewell CEO

Phone

03 7510 825

Cell Phone

0275 975 049

Email

ceo@foxguides.co.nz

Contact Person and role

Phone

Cell Phone

Email

B. Activities applied for

Please fill in all the forms that are applicable in order to cover all the activities the applicant wishes to undertake on public conservation land. Please tick below the forms that have been completed, and attach.

| ACTIVITY | | FORM | 1 |
|--------------|--|------|----------|
| Grazing | | 2a | |
| Land use: | | | |
| A. | Tenanting and/or using existing DOC facility/structure | 3a | |
| В. | Use of public conservation land for private/commercial facility/structure | 3b | |
| C. | Easements across public conservation land including right of way, stock access, convey electricity, drain sewerage, waterpipes etc | 3c | |
| Guiding/Tou | rism/Recreation: | | , |
| A. | Walking/Hiking/Tramping/Hunting/Fishing/Horses/4WD activities etc | 4a | ✓ |
| B, | Watercraft activities | 4b | |
| C. | Aircraft activities | 4c | |
| Filming | | 5a | |
| Sporting Eve | ents | 6a | |
| 011 | ties that may not be sufficiently covered in the above forms) | 7a | |

C. Background Experience of Applicant

Please provide relevant information relating to the applicant's ability to carry out the proposed activity (e.g. details of previous concessions, membership of professional organisations and relevant qualifications). Attach details and label Attachment 1a:C.

The applicant is an existing concessionaire (WC/001-Gui) conducting glacier activities at Westland Tai Poutini National Park since 1974

Has the Applicant or any of the company directors, trustees, partners, or anyone involved with the Application been convicted of any offence? Does the Applicant or any of the company directors, trustees, partners, or anyone involved with the Application have any current criminal charges pending before the court? If yes, please supply details.

D. Testimonials

Please attach two written testimonials, together with the names, occupations, addresses and phone numbers of two people who will vouch for the proficiency of the applicant in the proposed activity. At least one testimonial should contain information in relation to the financial viability and standing of the applicant. These testimonials are to be labelled Attachment 1a:D.

E. Consultation Undertaken

Most applications require consultation with whanau/hapu/iwi (local Maori), and other interested parties. Please read the information on the DOC website and contact the nearest Department of Conservation office to discuss what is required. Written expert views, advice or opinions concerning your proposal may also be attached to support the application. Attach any proof of consultation to the application and label Attachment 1a:E.

F. Insurance

Concessionaires are required to indemnify the Minister against any claims or liabilities arising from their actions. If this application is approved, the applicant will be required to hold Public Liability, and possibly Statutory Liability and/or vehicle insurance. The level of cover will depend on the nature of the activity. Please contact the nearest Department of Conservation office to discuss what is required.

G. Public Notification

Some activities and/or types of concession applications require public notification if the Department forms an intent to grant the concession. This increases the time and cost of processing the concession. The usual circumstances when public notification is required are thus:

- The Application is for exclusive use of public conservation land (ie a lease);
- The Application is for a licence for a term longer than 10 years;
- Other concessions do not require public notification unless the adverse effects of the activity are such that it is required.

A permissions advisor can advise you as to the type of concession your activity requires and whether or not it needs notification.

H. Fees and costs

Processing Fees:

Section 60B of the Conservation Act contains the statutory provisions regarding processing fees.

The Department recovers all direct and indirect costs to process a concession application from Applicants regardless of whether the application is approved or declined. The cost of processing a concession depends on whether the application needs to be notified or not (see Public Notification section above), and/or whether the application is a standard application or is complicated/complex.

The cost of processing a standard non-notified concession is likely to be between \$2065 and \$2565 plus GST. If the application is assessed as complex, covers multiple regions, or includes more than 20 individual locations, this fee is likely to be higher. The Department will send an estimate of costs to the Applicant once the application has been assessed.

The cost of processing a standard notified concession is likely to be between \$3500 and \$5500 plus GST. This fee is likely to be higher if the application is assessed as complex, covers multiple regions, or if a hearing is required. The Department will send an estimate of costs to the Applicant once the application has been assessed. The Department will re-estimate the cost and provide this to the Applicant if further costs are likely due to significant public interest during the public notification process.

Applicants are entitled to request an estimate of costs at any point but the Department may impose a charge for preparing such an estimate. Estimates are not binding.

The Department will ordinarily invoice the Applicant for processing fees after a decision has been made on the application but in some cases interim invoices will be issued. If at any stage an application is withdrawn the Department shall invoice the Applicant for the costs incurred by the Department up to that point. Applicants are required to pay the processing fees within 28 days of receiving an invoice. The Director-General is entitled to recover any unpaid fees as a debt.

The Director-General of Conservation has discretion to reduce or waive processing fees. If your application is for landing aircraft for personal recreational use you may be eligible for a reduction of 50% of the processing fee.

The Department may obtain further information either from the applicant or from any other relevant source in order to process the application. The applicant will be advised of any information obtained from other sources. The cost of obtaining such information will be charged to and recovered from the applicant. The applicant will be informed as soon as practicable from receipt of the application if further information is required before this application form can be fully processed by the Department.

Ongoing Fees:

If your application is approved, you will also be required to pay annual fees throughout your concession. These are:

- Annual management fee to cover administration time; and/or
- Monitoring fee (if required) to cover the cost of monitoring the effects of your activity; and/or
- Activity fee per head (if a recreation concession), or a minimum fee per year; and/or
- Annual rental (if a land use concession eg lease)

Please contact the nearest Department of Conservation office to discuss the applicable fee and processing timeframe for the application.

Terms and Conditions for an Account with the Department of Conservation:

Have you held an account with the Department before? (Please tick)

Yes ✓ No

If ves, under what name:

Alpine Guides Fox Glacier LTD

- 1. I/We agree that the Department of Conservation can provide my details to the Department's Credit Checking Agency to enable it to conduct a full credit check.
- 2. I/We agree that any change which affects the trading address, legal entity, structure of management or control of the applicant's company (as detailed in this application) will be notified in writing to the Department of Conservation within 7 days of that change becoming effective.
- 3. I/We agree to notify the Department of Conservation of any disputed charges within 14 days of the date of the invoice.
- 4. I/We agree to fully pay the Department of Conservation for any invoice received on or before the due date.
- 5. I/We agree to pay all costs incurred (including interest, legal costs and debt recovery fees) to recover any money owing on this account.
- 6. I/We agree that the credit account provided by the Department of Conservation may be withdrawn by the Department of Conservation, if any terms and conditions of the credit account are not met.
- 7. I/We agree that the Department of Conservation can provide my details to the Department's Debt Collection Agency in the event of non-payment of payable fees.

Declaration

I certify that the information provided on this application form and all attached additional forms and information is to the best of my knowledge true and correct.

Note: The Minister can vary any concession granted if the information given in this application

contains inaccuracies.

Signature (Applicant)

(Applicant)

Signature (Witness)

Witness Name

Witness Address

Date

20.02.2019

Date

20 02 - 2019

938 COOK Flat Road, Fox Glacier 7859.

This application is made pursuant to Sections 17R and 17S of the Conservation Act 1987 [and (where applicable) Section 49 of the National Parks Act 1980/Section 59A of the Reserves Act 1977].

Applicants should familiarise themselves with the relevant provisions of the Conservation Act 1987, the Reserves Act 1977 and the National Parks Act 1980 relating to concessions.

Once the application is complete, the Minister has 20 days within which to advise the applicant whether the application is declined on the grounds that the application does not comply with or is inconsistent with the provisions of the Act or any relevant Conservation Management Strategy or Conservation

Management Plan. If the Minister does not so advise the applicant the application will be processed in accordance with Section 17T of the Conservation Act 1987.

The purpose of collecting this information is to enable the Department to process your application. The Department will not use this information for any reason not related to that purpose.

Applicants should be aware that provisions of the Official Information Act might require that some or all information in this application be publicly released.

For Departmental use

Credit check undertaken

Comments:

Signed

Approved (Tier 4 manager or above)

Name

Name

Concession Application Form 4a – Guiding/Tourism/Recreation: Walking, Hiking, Tramping, Hunting, Fishing, Horses, 4WD Activities etc

The Department recommends that you contact the Department of Conservation Office closest to where the activity is proposed to discuss the application prior to completing the application forms. Please provide all information requested in as much detail as possible. Applicants will be advised if further information is required before this application can be processed by the Department.

This form is to be used when the proposed activity involves landbased guiding of clients on public conservation land. Examples may include hiking, walking, hunting, fishing, horse treks, or 4WD activities. This form is to be completed in conjunction with either Applicant Information Form 1a (longer term concession) or Applicant Information Form 1b (one-off concession) as appropriate.

- If your application involves transportation on public conservation land eg kayaking, boat transfers, aircraft landings, please also fill in Form 4b and/or Form 4c as applicable.
- If your application includes building, extending or adding to any permanent or temporary structures or facilities on public conservation land, please also fill in Form 3b,
- If your application includes tenancy of any DOC managed buildings (other than overnight usage of huts) please also fill in Form 3a.

Please complete this application form, attach either Form 1a or Form 1b (as appropriate) and any other applicable forms and information and send to permissions@doc.govt.nz. The Department will process the application and issue a concession if it is satisfied that the application meets all the requirements for granting a concession under the Conservation Act 1987.

If you require extra space for answering please attach and label according to the relevant section.

Location(s) and Activity(ies)

List the areas of your operation, please use NZTM GPS coordinates where possible, and attach a map and label Attachment 4a:A. If you are unable to identify the areas or you do not know them, please seek the assistance of Departmental staff.

| Duration of Visit: less than 1 hour; 1 – 4 hours; 4 – 24 hours | 1 – 4 hours | 1-8 hours | 4-8 hours | 4-48 hours | 1 -4 hours | 1-4 hours |
|---|---|---|---|--|---|--|
| Frequency of Use (trips) | 6 trips per week Saturdays and Sundays | , | | | | |
| Max. Party Size (incl. guides) | yed 9 | 1 guide to 11 pax per group | 1 guide to 4 pax per group | 1 guide to 4 pax per group | 1 guide to 18 pax per group | 1 guide to 15 pax per group |
| Proposed months/season | October - April | Year Round | Year Round | Year Round | Year Round | Year Round |
| DOC Facilities (eg huts) or informal campsites | n/a | | | Chancellor Hut | | |
| Activity | Guided walk and nature interpretation | Glacier Guiding Helihike | Ice Climbing | Guided Walk | Guided Walk | Glacier Guided Half Day Walk |
| Name of Conservation Area and track | EG: Matiu/Somes Scientific Reserve: Matiu Circuit Track | Westland Tai Poutini National Park, Victoria Flat | Westland Tai Poutini National Park, Victoria Flat | Westland Tai Poutini National Park, Chancellor Dome | Westland Tai Poutini National Park, Fox Valley Terminal Face | Westland Tai Poutini National Park, Lower Icefall Fox Glacier |

Page 2 of 5

Year Round

Glacier Guided All Day Walk

Park, Lower Icefall Poutini National Westland Tai

Fox Glacier

Page 3 of 5

B. Environmental Impact Assessment

This section is one of the most important factors that will determine the Department's decision on the application. Please answer in detail.

In column 1 please list all the locations of your proposal, please use NZTM GPS coordinates where possible. In column 2 list any special features of the environment or the recreation values of that area. Then in column 3 list any effects (positive or adverse) that your activity may have on the values or features in column 2. In column 4 list the ways you intend to mitigate, remedy or avoid any adverse effects noted in column 3. Please add extra information or supporting evidence as necessary and label Attachment 4a:B.

Refer to Steps 1 and 2 in your Guide to Environmental Impact Assessment to help you fill in this section.

| Location on public conservation land | Special feature or value | Potential effects of your activity on the feature or value (positive or adverse) | Methods to remedy, mitigate or avoid any adverse effects identified |
|---|------------------------------------|--|---|
| EG: Matiu/Somes Island Matiu Circuit Track | Endemic geckos, skinks, tuatara | Damage to habitat when walking (adverse) | Ensure all clients stay on paths |
| | | Increase knowledge of native species through guiding interpretation (positive) | |
| Fox Glacier, Victoria Flat | | Permitted Use | Refer to attached application |
| Fox Glacier, Lower Icefall | | Permitted Use | Refer to attached application |
| Fox Glacier, Chancellor Dome | | Permitted Use | Refer to attached application |
| Fox Glacier, Terminal Face | | Permitted Use | Refer to attached applilcation |

C. Term

Please detail the length of the term sought (i.e. number of years or months) and why. If you are applying for a one-off permit please state the specific dates and/or times sought.

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.

20 years as contained in the Concession Allocation in Limited Supply Situations as an incumbent operator and the preferential right to apply as agreed between TIA and DOC in July 2008.

D. Bulk fuel storage

Under the Hazardous Substances and New Organisms Act 1996 (HSNO Act) 'Bulk fuel storage' is considered to be any single container, stationary or mobile, used or unused, that has a capacity in excess of 250 litres of Class 3 fuel types. This includes petrol, diesel, aviation gasoline, kerosene and Jet A1. For more information on Hazardous Substances, go to: http://www.business.govt.nz/worksafe/information-guidance/legal-framework/hsno-act-1996

Do you intend to store fuel in bulk on the land as part of the activity?

YES / NO

If you have answered yes, then please provide full details of how and where you intend to store the fuel, and label any attachments including plans, maps and/or photographs as Attachment 4a:D. If your concession application is approved you will be required to provide a copy of your HSNO compliance certification to the Department before you begin the activity.

E. Safety Plan

The Department requires that all concessionaires holding concessions for recreation or tourism activities have a safety plan which has been audited by an external expert.

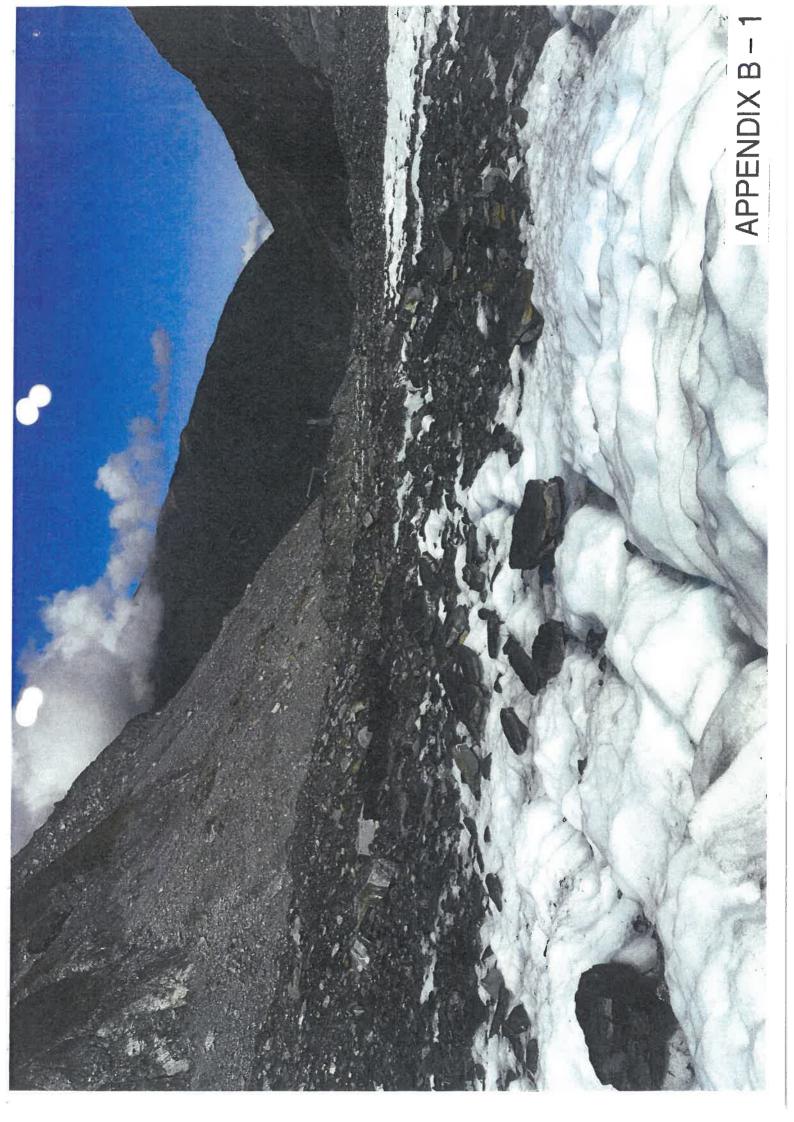
If your activity is covered by the Health and Safety in Employment (Adventure Activity) Regulations 2011 proof of that audit is sufficient. If your activity is **not** covered by the Adventure Activity Regulations, please read the *Guidelines on the Requirements for Concessionaire Safety Plans* on the Department's website. If you are unsure please go to the WorkSafe website and read their guidance.

If your concession application is approved, you will be required to provide a copy of an independent auditor's approval of your safety plan to the Department before you begin the activity.

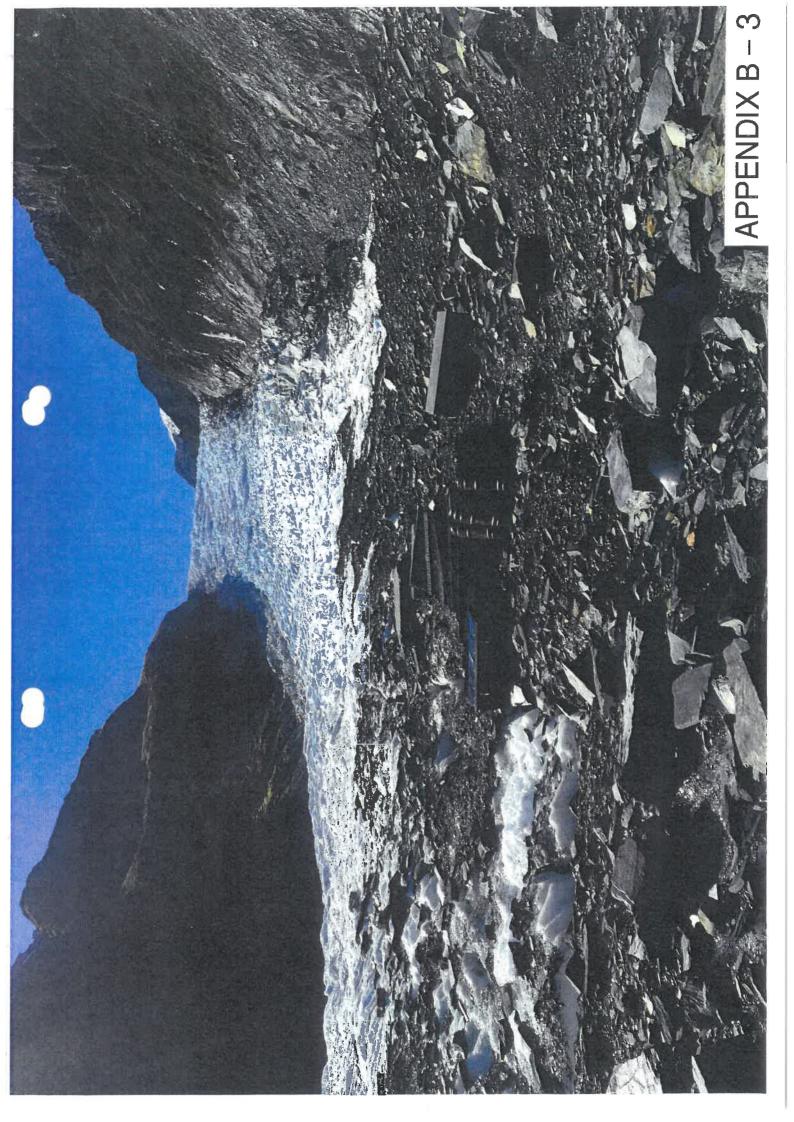
F. Other

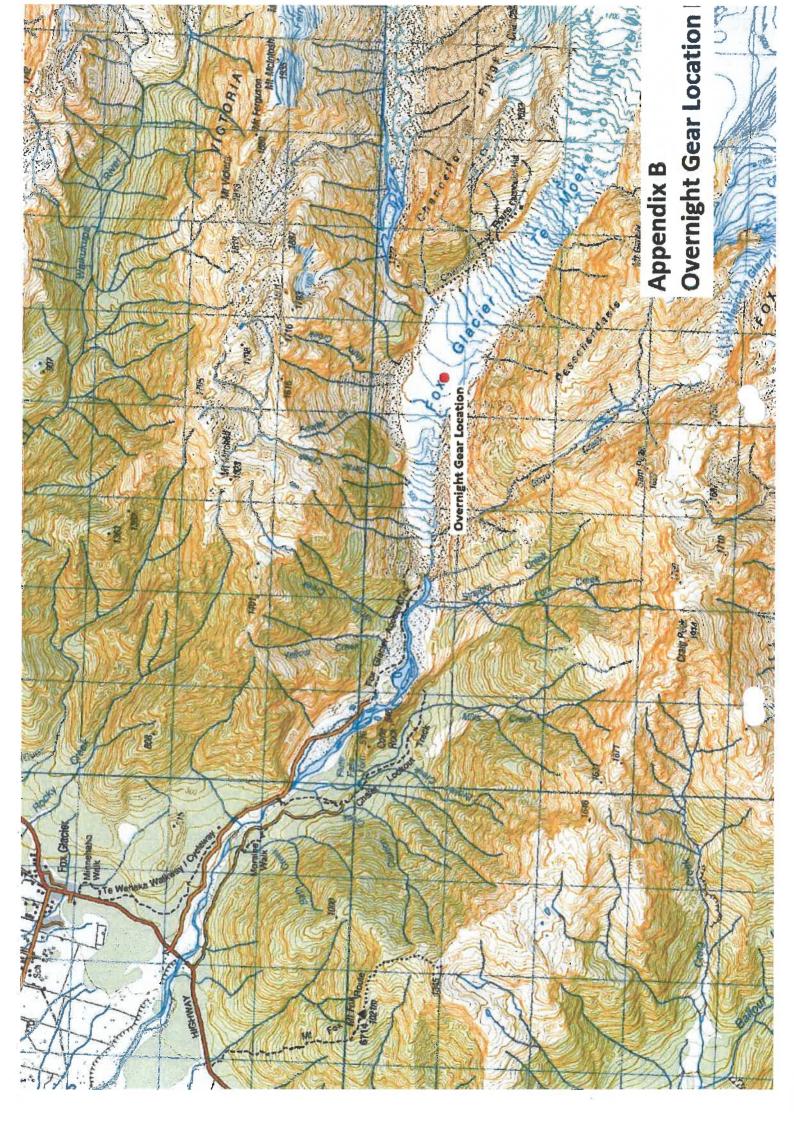
Is there any further information you wish to supply in support of your application? Please attach if necessary and label Attachment 4a:F.

| | 2018/2019 | Total daily flight time 10 hours & 24 minutes | 8:15am Fox Trail | | 9:10am | 10:00am | | | | | | | | | 5:00pm Fox Trail | | | |
|-------------|----------------------------|---|------------------------------------|-----------------|-------------------------------------|---------|-------------------------------------|------------------|------------------|--------------------------------------|-------------------------------------|------------------------------------|------------------------------------|----------------|------------------|----------------|-----|--|
| | Track | 2 loads = flight time 18 minutes | Fly time Z:1Sam | | | | | | | | | Hy out 3pm | | | | | | |
| | IC/Extreme Fox 3 Guides | 12 pax 6 loads = flight time 48 minutes | Check in 8:00am | Fly time 9:00am | | | | | | | | | | Fly out 4:30pm | | 7 | | |
| Layer 1 | Flying Fox 3 Guides | 33 Pax/trip 99/day Up to 24 loads = flight time 3 hours & 12 minutes | | | Check in 8:50 am Fly time 9:30am | | | | | Check in 11:50am Fly time 12:30pm | | | Check in 2:50pm Fly time 3:30pm | | | Fly out 5:00pm | | |
| Layer 2 | Flying Fox 3 Guides | 33 Pax/trip 99/day Up to 24 loads = flight time 3 hours & 12 minutes | | Check in 7:50am | Fly time 8:30am | | | Check in 10:50am | Fly time 11:30am | | | Check in 1:50pm Fly time 2:30pm | | | Fly out 5:30pm | | | |
| Layer 3 | Flying Fox 3 Guides | 33 Pax/trip 99/day Up to 24 loads = flight time 3 hours & 12 minutes | Check in 6:50am Fly time 7:30am | | | | Check in 9:50am Fly time 10:30am | | | | Check in 12:50pm Fly time 1:30pm | | | Fly out 4:30pm | | | | |
| Trip Timing | Schedule F19 | Flights time based on 8 minutes 7:00am | 8:00am | | 9:00am | 10:00am | 11:00am | | 12 noon | 1pm | 2pm | зрт | 4pm | | ELGC C | 9bm | 7pm | |

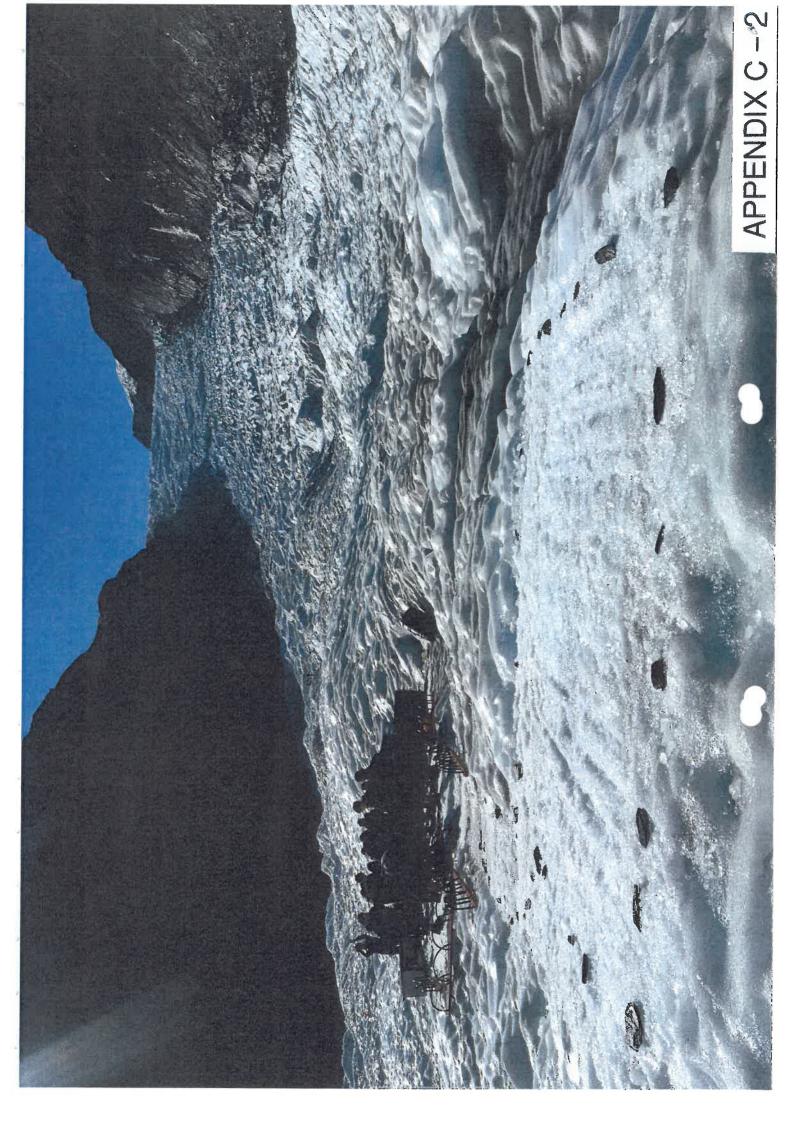


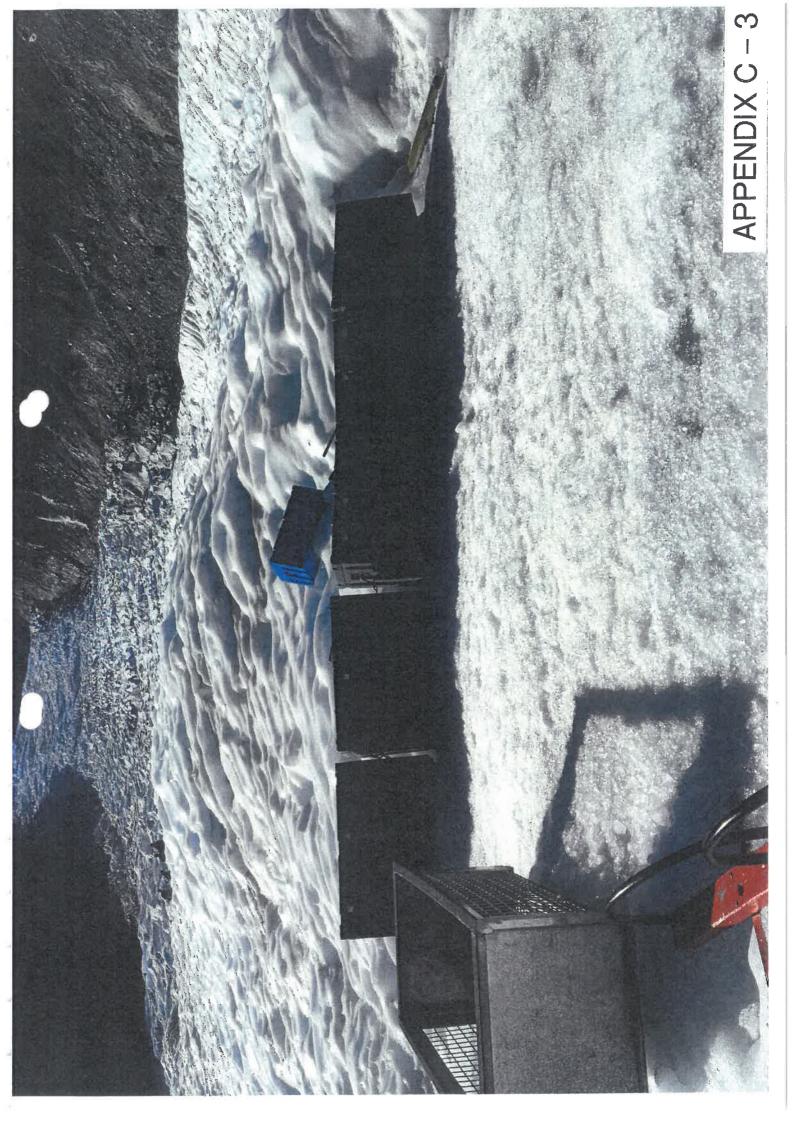


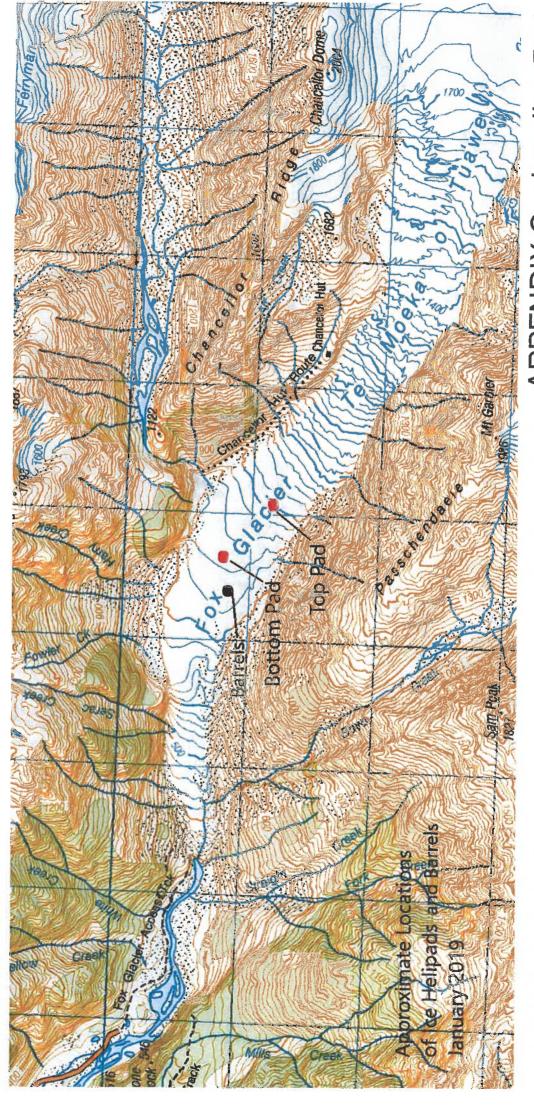




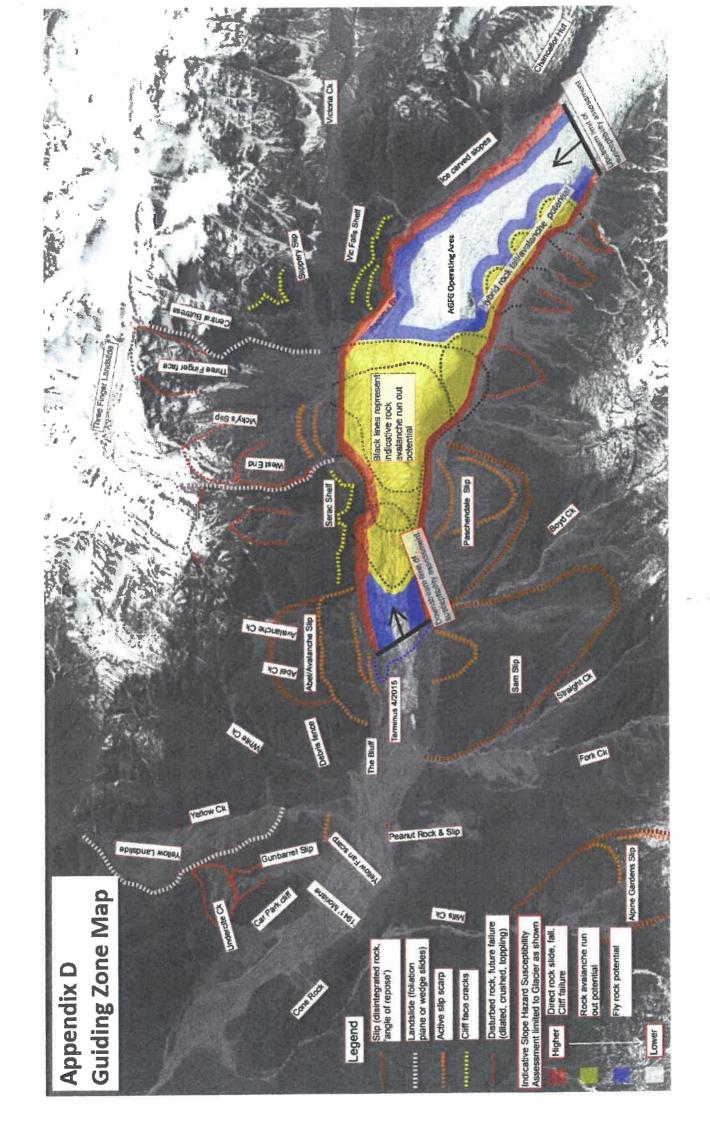








APPENDIX C - Landing Pad



APPENDIX E - Slide 3

Please rate the quality of your experience with us in the following areas: **Customer Service Feedback**

| | Far Worse than Expected | S S | Worse than Expected | As | As Expected | | Better than Expected | | Far better than Expected | | Total |
|---|----------------------------|----------|------------------------|----|-------------|-----|-------------------------|-------|-----------------------------|------|-------|
| For bookings reserved directly with Fox Glacier Guiding, the quality of service | 0.24% | - | 0.97% 16 | | 37.0% | 809 | 36.6% | , 109 | 25.2% | 415 | 1644 |
| The quality of service received from sales staff at check in was: | 0.39% | - | 1.71% 31 | | 44.5% | 208 | 32.9% | 969 | 30.5% | m | 1813 |
| The quality of the pre trip briefing (which is intended to prepare you fully for th | 0.33% | | 1.31% 24 | | 31.8% | 285 | 42.3% | = | 24.3% | 447 | 1839 |
| The quality of the information and education you received from the guides was | 0.71% | m | 130% 24 | | 16.2% | 867 | 37.8% | 697 | 44.0% | 810 | 1842 |
| The level of safety and risk management by the guides was: | 0.22% | 4 | 0.87% 16 | | 21.2% | 389 | 34.4% | 633 | 43.3% | 96/ | 1838 |
| The friendliness, sense of fun and professionalism of the guides was: | 0.54% | 9 | 1.03% 19 | | 9.9% | 183 | 29.8% | 549 | 28.7% | 1080 | 1841 |
| The quality and range of equipment provided was: | 0.22% | 4 | 0.98% 18 | | 27.4% | 205 | 39.5% | 174 | 32.0% | 283 | 1835 |
| The amount of aircraft noise overhead while you were on the glacier was: | 0.84% | 8 | 421% 75 | | 46.3% | 826 | 27.3% | 486 | 21.4% | 381 | 1783 |
| Overall, the experience was: | 0.54% | 10 | 2.34% 43 | | 10.6% | 194 | 36.4% | 699 | \$0.1% | 921 | 1837 |

Customer Feedback

During the trip did you feel at all crowded during any part of your visit?

| Answer Choices | | |
|--------------------|------|--------|
| Not at all crowded | 1260 | %99'89 |
| Slightly Crowded | 437 | 23.81% |
| Moderately Crowded | 113 | 6.16% |
| Extremely Crowded | 25 | 1.36% |
| | 1835 | |

Customer Feedback

If you did feel some element of crowding, please advise where this occurred:

| If you did feel some element of crowding, please advise where this occurred: | | | |
|--|-----------|-----|----|
| | | | |
| Answer Chorees | Responses | | 74 |
| In the glacier car park | 18.18% | 16 | 9 |
| On the public track leading up to the glacier | 14.77% | 57 | 7 |
| At the rope barrier | 10.23% | 6 | co |
| On our private track leading up to the face of the glacier | 10.23% | 23 | 9 |
| On the glacier itself | 39.77% | 104 | 4 |
| Other (please specify) | 20.55% | 11 | 30 |
| | | 222 | |



SILVER LEVEL OF CERTIFICATION

This is to certify that

Fox Glacier Guiding

has been endorsed by Qualmark,
and awarded Silver under the Sustainable Tourism Business criteria.
The licence is held by Rob Jewell.

It has also been classified as:

Endorsed visitor activity

Date of evaluation 06 July 2018 Gregg Anderson, General Manager Qualmark New Zealand Ltd



Adventure Mark

SAFETY AUDIT CERTIFICATION

| This is to certify that | ALPINE GUIDES FOX GLACIER LIMITED trading as Fox Glacier Guiding and Mount Cook Glacier Guiding | |
|-------------------------|---|--|
| | | |
| | | |
| At 44 Main Road, Fox 0 | Blacier | |

has successfully demonstrated conformance with the requirements of the

NEW ZEALAND SAFETY AUDIT STANDARD FOR ADVENTURE ACTIVITIES (2017)

and is certified to conduct the following activities:

| ADVENTURE ACTIVITY | LOCATION |
|---|---|
| Glacier Guiding, Mountaineering and Ice Climbing | Tai Poutini/Westland National Park |
| Glacier Guiding, Mountaineering and Ice Climbing | Aoraki/Mount Cook National Park |
| Ski Touring | Tai Poutini/Westland National Park Aoraki/Mount Cook National Park |
| Issue date 26 October 2018 | Expiry date 16 June 2021 |
| Original certification date 17 June 2018 | Certificate number AAO 113 |
| HemiElBrete | |
| Hemi Morete Certifier | |



AdventureMark® Limited

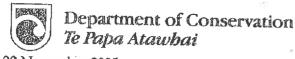


Certified by AdventureMark® Ltd and subject to AdventureMark® Ltd terms and conditions for certification, as detailed on www.adventuremark.co.nz

While all due care and skill was exercised in carrying out this safety audit, AdventureMark®Ltd accepts responsibility only for proven negligence. To verify that this certificate is current, please refer to the Worksafe NZ Register of Adventure Activity Operators.



WWW.JAS-ANZ.ORG/REGISTER



22 November 2005

Marius Bron Alpine Guides PO Box 38 Fox Glacier

Dear Marius

USE OF A CHAINSAW ON FOX GLACIER

Further to my letter of 17 November regarding Alpine Guides use of chainsaws on the Fox Glacier, I have now considered further your request to continue using chainsaws as part of your track forming process in the long-term. I can advise that I authorise the use of chainsaws on the Fox Glacier by Alpine Guides Fox Glacier subject to the following conditions:

The saw must be used only by people who have a minimum of NZQA units 6916 (Demonstrate knowledge of the Code of Practice relating to chainsaw use), 6917 (Operate a chainsaw) and 43 (Maintain a chainsaw), or any units that may replace these in future.

2 Operators will wear steel toe capped boots, chainsaw chaps, helmet, eye and ear protection.

The saw must not be refuelled on the ice.

Fuel and lubricants for the saw must be securely stored in small quantities (max. 5L) off the ice.

No use of the saw after 9.30 a.m. on any day and must not be used within sight or hearing of the general public at the terminal face of the glacier.

The saw and all associated equipment is to be stored with a bar cover on and away from public view during the day.

When the saw is being transported to and from the glacier it is to be kept from public view by being carried in a bag or similar covering.

Bar lubricant must be vegetable oil based and not leave stains on the ice.

The chainsaw is not to be the first option for cutting. The saw is only to be used to establish notches and ledges and only then when Alpine Guides consider the time saved will be beneficial to both client and guide safety.

10 Use of the saw in front of the guided clients and the general public is to be avoided where possible.

11 That the current SOP will be amended to include these conditions and Alpine Guides will include the procedures in its overall guiding safety plan.

12 That should issues of safety or general public dissatisfaction becomes an issue, the Department has the right to suspend this agreement until the issue has been resolved.

If any of these conditions require clarification, please contact either myself or Kim Patterson.

Yours sincerely

Mere Mokoraka Area Manager

South Westland Webeka Area Office

mnoweako

P.O. Box 9, State Highway 6, Fox Glacier, New Zealand Telephone 03-751 0807, Fax 03-751 0858

www.doc.govt.nz



19 June 2006

Marius Bron Alpine Guides PO Box 38 Fox Glacier

Dear Marius

EXTENSION TO HOURS OF USE OF A CHAINSAW

Thank you for your letter of 8 June 2006, requesting to extend the current hours of chainsaw use on the Fox Glacier. As outlined in your letter, I understand the conditions of the advancing glacier combined with the shorter winter daylight hours are resulting in the need for hours of use to be extended from the current 9.30am completion time. I hereby grant an extension to the hours that the chainsaw maybe used on the Fox Glacier to 11.00am for the months of May to August (inclusive).

If you have any further concerns, please do not hesitate to contact me.

Yours sincerely

Mere Mokoraka Area Manager

