

29 May 2025

Tēnā koe [REDACTED]

Thank you for your request to the Department of Conservation (DOC), received on 1 April 2025, in which you asked a range of questions relating to *proposed changes to hut and campsite fees, funding models for DOC huts, and the wider management of New Zealand's public backcountry hut network*.

We have considered your request under the Official Information Act 1982 (the OIA).

Your request for information is wide ranging and complex. On 1 May 2025 we extended the timeframe to respond to your request to 30 May 2025, due to the large quantity of information sought.

On 1 and 2 of May 2025 during telephone discussions with Steven Kerr, Principal Commercial and Revenue Advisor, you clarified and refined your request. I have detailed the refinements in my response to each of your questions.

Background information and context

DOC provides recreation opportunities (or experiences) for the public on Public Conservation Land throughout the country. These experiences are largely underpinned by assets (e.g. huts, bridges), and collectively described as the "Visitor Network". The Visitor Network is very large and consists of over 14,000 km of track, over 13,000 structures, over 900 huts, over 330 campsites, over 3,500 amenity areas, and over 30 cottages and houses that DOC looks after.

DOC must work within a funding envelope set by the government, referred to as the "Recreation Opportunities Appropriation". User charges from facility fees make up a small but important part of this Appropriation. Providing recreation opportunities requires balancing a wide range of matters, such as DOC's statutory remit (that includes [statutory planning documents](#) as well as the primary legislation), operating practicalities, operating laws/regulations, and its funding allocation. This is a significant ongoing challenge for DOC.

There are two key elements in operating the Visitor Network – the day-to-day operations that include asset management (maintenance and replacement) and service delivery (e.g. Visitor Centres and Hut and Community Rangers). The day-to-day maintenance and service delivery is provided by regional operations field staff and supported by national specialist functions such as finance, asset management, visitor safety and others. You can find more about DOC's operations and funding by reading its [Annual Reports](#).

User fees account for about 10% of the Recreation Opportunities Appropriation and therefore all facilities and tracks are heavily subsidised or supported by taxpayer funds. The fee structure for huts is mostly based on hut categories (e.g. Serviced, Standard, etc.), and with a small set of facilities such as Great Walks and those in 'high demand' having bespoke or individual fees. The fee structure can be viewed on DOC's [hut fees webpage](#).

DOC reviews its fees (e.g. Great Walks, huts, campsites) on an ongoing three-yearly cycle – all facility fees are not reviewed each year due to resourcing. The reports provided to you under this request are examples of these reviews. To outline DOC's pricing approach, I have decided to release a briefing to DOC's Senior Leadership Team listed as item 10 in the Document Schedule at the end of this letter.

The Minister of Conservation has directed DOC to look to increase income from other sources such as user fees and [charging for access](#) to address shortfalls in operating expenses shortfalls and the increasing costs associated with operating the Visitor Network. To help get more done within its funding envelope, DOC works with volunteer organisations such as *Permalot* and the *Backcountry Trust* to maintain some of its huts and tracks that we could not otherwise afford to maintain. In addition, the Future Visitor Network (FVN) review is a significant programme to review and address the balance and scale of the Visitor Network in response to changing visitor needs and financial pressures. As the FVN work progresses, DOC will be engaging with the public on its findings and recommendations.

Your request

Your questions and our responses are listed below:

1.1 A copy of the internal consultation paper or briefing referred to in The Press article dated 6 January 2025, "Remote huts could cost 'ludicrously' high \$57 a night under 'dangerous' DOC plan" <https://www.thepress.co.nz/nz-news/360536369/remote-huts-could-cost-ludicrously-high-57-night-under-dangerous-doc-plan>

I have decided to release the document titled *Consultation paper: Charging options for Basic and Bivvy Huts* in full, referred to as item 1 in the Document Schedule at the end of this letter. This paper was supplied to stakeholders as part of the review of the Basic and Bivvy Hut fees.

1.2 All drafts, consultation documents, or summaries relating to fee changes for backcountry huts and campsites considered as part of the Future Visitor Network Review, including those proposing increased fees, downgrading or divestment of huts, and changes to hut categorisation or servicing.

As discussed with you on 1 May 2025, the FVN review does not cover fee reviews. Therefore, this aspect of your request is refused under section 18(e) as the documents requested do not exist.

Information relating to fee reviews are addressed under your question 1.3 below.

1.3 Any internal or external risk assessments or policy papers produced since January 2023 evaluating revenue-generating models for backcountry hut and campsite infrastructure.

As agreed with you on 1 May 2025, “revenue-generating models” means fee reviews. I have decided to release the reports or presentations containing analysis, recommendations and decisions relating to *backcountry hut and campsite infrastructure* since January 2023 to the date your request was received. These documents are listed from 2-8 in the Document Schedule at the end of this letter.

1.4 *Any minutes or correspondence from DOC's Heritage and Visitor Strategy steering group or internal leadership meetings relating to the above matters.*

The Future Visitor Network review is currently being developed. Minutes and correspondence related to the FVN are withheld under the following sections of the OIA:

- advice still under consideration, section 9(2)(f)(iv) – to maintain the current constitutional conventions protecting the confidentiality of advice tendered by Ministers and officials,
- free and frank expression under section 9(2)(g)(i) – to maintain the effective conduct of public affairs,
- preventing undue pressure on officials, under section 9(2)(g)(ii) – to protect Ministers, officials, or employees from improper pressure or harassment.

Facility fee decisions are made by the Deputy Director General, Biodiversity, Heritage and Visitors under delegated authority. Decisions regarding fee reviews have been released in response to your question 1.3.

2.1 *Has the Department updated or implemented new funding models for huts and campsites since 2023? Please provide details, including any fee-setting methodologies, targeted fee tiers (e.g. for standard vs basic huts), and criteria for introducing charges to currently free assets.*

You agreed with Steven Kerr on 1 May that the information requested in this question is the same as that for your question 1.3.

2.2 *Details of any proposals or decisions to:*

- Remove huts from the public network
- Downgrade hut classifications (e.g. standard to basic)
- Transfer hut ownership or maintenance responsibility to other parties (e.g. trusts or private individuals)

2.3 *If these changes are proposed or underway, please provide associated timeframes, decision-making criteria, and public consultation processes (if any).*

As discussed with Steven Kerr on 1 May, information related to the above questions are still under consideration as part of the FVN Review and information associated with it is withheld for same reasons outlined in our response to question 1.4.

2.4 *A copy of any internal or external review evaluating whether demand-driven asset management appropriately captures the value of remote or low-use huts.*

As discussed with you on 1 May, we have not undertaken any review described in the above question. However, we do consider that demand and levels of use are important factors in understanding the value of DOC's visitor facilities and this is founded on well understood economic and commercial concepts.

We have developed 'thresholds' to understand what high demand may look like for DOC's visitor facilities. I have decided to release the document titled *Occupancy Thresholds for DOC Recreation Facilities*, referred to as item 9 in the Document Schedule at the end of this letter.

3.1 The total number of huts DOC currently manages, and the number within each classification (serviced, standard, basic, heritage).

I have set out the number of huts open to the public by service category that "DOC currently manages" in the table below. This information separates 'DOC owned' huts from those owned by third parties on Public Conservation Land that are available to the public.

Please note that there are agreements in place for DOC to 'manage'/maintain some third-party huts and for third parties to manage 'DOC owned' huts. Accordingly, the term "manage" has some subjectivity and assumptions are required to provide the data you requested. Given that the information on these agreements is not kept in one place, and due to the time involved to extract and collate the required data, we have not broken it down further. Therefore, you should refer to the "DOC owned" column in the table as an indication of the number of huts "DOC currently manages".

Hut Category	No. of huts		Heritage* – actively managed
	DOC owned	Third party owned	
Great Walk	33	2	1
Serviced	97	3	6
Standard	406	12	24
Serviced Alpine	7	9	2
Basic/Bivvy	362	35	37
Total	907	61	70

* subset of DOC owned huts.

Note: there are some data entry errors in our database, which has required some interpretation and adjustments to the output. Therefore, it is possible that the data in the above table may differ from the numbers in other reports or information prepared by DOC.

3.2 The total allocation from Treasury to DOC for hut maintenance, upgrades, or replacements in each of the last five financial years.

As discussed with you on 1 May, Treasury does not allocate funds to DOC specifically for hut maintenance, upgrades, or replacements. It generally allocates the funding based on specific "Appropriations". The "Recreation Opportunities Appropriation" covers recreation or visitor facilities (and other assets) from which DOC allocates funding to "hut maintenance, upgrades, or replacements". The last 5 years of this appropriation is set out in the table below. Much of this information can be found in DOC's [Annual reports](#).

Financial Year	19/20	20/21	21/22	22/23	23/24
Recreation Opportunities Appropriation (\$M)	193.64	194.454	188.64	186.12	231.81

3.3 The proportion of DOC's deferred maintenance backlog (\$300 million as of 2023) attributable specifically to huts.

I note the \$300 M is the replacement backlog and not deferred maintenance. The replacement backlog at year end 2023 attributable specifically to huts, is in the order of \$11 M (based on approximately 100 huts with a Net Book Value of \$0). This is about 4% of value of the total backlog. This does not include the backlog for structures and other assets that are on tracks that may lead to these huts.

3.4 Any requests by DOC to Treasury for additional funding to address this hut-related maintenance backlog, including Treasury's responses.

DOC requested additional funding to address deferred asset maintenance through Budget 2022. From Budget 22, DOC received \$60 M over four years for Visitor Asset Management (22/23 – 25/26), which includes huts, and \$7 M of ongoing funding (26/27 and beyond). This amount did not cover all of DOC's financial needs for the ongoing management of its visitor assets (including huts).

3.5 The breakdown of DOC's visitor asset funding allocations over the last five years between huts, tracks, campsites, and other infrastructure.

DOC's financial system does not breakdown the costs and funding allocations by asset class (e.g. huts, campsites, tracks). Consequently, we are unable to provide this level of information, and this aspect of your request is refused under section 18(g) of the OIA as the information is not held.

3.6 Total volunteer hours contributed to hut maintenance (internal and external groups), and the number of huts that received:

- **DOC internal volunteer support (e.g. wardens)**
- **Maintenance from partner organisations (e.g. Backcountry Trust)**
- **Material or labour donations from the public**

Our systems do not record volunteer hours in a manner that allows us to report on the questions listed above. Therefore, this aspect of your request is refused under section 18(g) of the OIA as the information is not held.

The only data we have on volunteer hours contributed to hut maintenance is from the Backcountry Trust. It's [Annual Performance Report](#) states that it contributed 3,500 hours of volunteer work on 30 huts in 2023/24. A link to that report is provided.

4.1 Any assessments undertaken on how fee changes may affect usage patterns, accessibility, or safety outcomes across different user groups (e.g. local residents, students, tourists, low-income trampers).

4.2 Any internal analysis on the risk that higher hut fees may:

- **Reduce use of huts in favour of unsafe practices (e.g. camping in hazardous locations)**
- **Deter reporting of maintenance/safety issues**
- **Limit the effectiveness of public feedback loops for remote asset management**

As discussed with you on 1 May, any analysis or assessment of the matters you raised in these two questions would be contained in the fee review reports referred to and provided in response to question 1.3. I note you agreed to limit these reports to commencing January 2023.

4.3 Has DOC examined social equity or affordability issues relating to fee increases, and the viability of lower-cost or subsidised models (e.g. student or volunteer discounts, donations-based models, or tiered pricing by hut category)?

Yes, DOC considers the issues you raised in reviewing and setting fees and has policy guidance on this (refer question 5.3). As Steven Kerr discussed with you on 1 May, if any analysis or assessment of the matters you raised in this question was undertaken, it would be contained in the fee review reports. These reports are provided in response to question 1.3 and I note you agreed to limit these reports to the period commencing January 2023.

5.1 How does DOC interpret its obligations under:

- **Section 6(e) of the Conservation Act 1987 (duty to foster recreation)**
- **The Occupiers' Liability Act 1962 as it applies to users of backcountry huts**
- **The Building Act 2004 and Building Code exemptions for backcountry huts**
- **The Heritage New Zealand Pouhere Taonga Act 2014 for heritage huts**

DOC's interpretation of its obligations regarding the above Acts of Parliament are set out in the various documents as follows:

Legislation	Documents interpreting the obligations
s6(e) of the Conservation Act 1987 (duty to foster recreation)	Conservation General policy* General Policy for National Parks* The DOC Strategy* Heritage and Visitor Strategy*
The Occupiers' Liability Act 1962	Visitor Risk Management Policy
The Building Act 2004 and Building Code exemptions for backcountry huts	Hut Procurement Manual for Backcountry Huts*
The Heritage New Zealand Pouhere Taonga Act 2014 for heritage huts	DOC does not currently have any documents on interpreting its obligations under this Act. A brief

Legislation	Documents interpreting the obligations
	<p>explanation of how we interpret our obligations is below.</p> <p>DOC complies with the archaeological provisions of the Act where groundworks are required around a pre-1900 hut. Each situation is assessed on a case-by-case basis, recognising the circumstances at place and the facts in hand. Heritage NZ is consulted when work is undertaken on a hut listed under the Act's requirements.</p>

The documents denoted with an “**” are available on the internet and links have been provided; the other documents are attached. Refer to items 11-15 and 17 in the Document Schedule at the end of this letter.

5.2 *Has DOC conducted or commissioned any legal review into how its statutory mandate applies to:*

- ***Backcountry hut closures or downgrades***
- ***Demand-based funding models***
- ***The classification of huts as "historic resources"***

DOC has not commissioned any legal reviews regarding the above matters.

5.3 *Please provide DOC's internal guidance documents (if any) that outline how it balances conservation obligations with fostering recreation and tourism in decision-making on huts.*

DOC has a wide range of internal documents that guide decision-making regarding huts we manage on Public Conservation Land. Each case requires considerable expert analysis interpreting the documents set out below. We have not named or provided all the internal documents as this would require substantial collation; therefore, I have provided what we consider the key and overarching documents:

- the documents referred to in question 5.1, 4.3 and 2.4
- the “Business Planning Directions” provided by Heritage and Visitors Directorate to the business (from 2022 to 2024¹)
- Strategic Directions for Heritage and Visitor Capital Expenditure
- DOC Asset Management Strategy
- Recreation facilities and services discount policy
- Recreation facilities and services pricing policy
- Asset Management Policy.

¹ This is to match the period for the fee review documents we provided under earlier questions.

These documents are attached and listed as items 17-24 in the Document Schedule at the end of this letter.

5.4 *How are Treaty of Waitangi obligations incorporated into hut-related decisions, especially in areas where iwi or hapū may oppose Crown-built infrastructure?*

There is no specific framework guiding DOC on incorporating Treaty of Waitangi obligations into “hut related decisions”. The consideration of these obligations is on a case-by-case basis, recognising the circumstances at place and the case in hand.

6.1 *Has DOC considered a backcountry rugby tournament as a revenue-raising or community engagement initiative?*

6.2 *Did the individual or team who proposed a \$57/night charge for basic huts play rugby, and if so, at what level?*

As discussed on 2 May with Steven Kerr, you have withdrawn questions 6.1 and 6.2.

I have considered the public interest as required in section 9(1) of the OIA and determined there are no public interests that outweigh the grounds for withholding.

You are entitled to seek an investigation and review of my decision on your request by writing to an Ombudsman as provided by section 28(3) of the OIA.

Please note that this letter (with your personal details removed) and attached documents may be published on DOC’s website.

If you would like to discuss this response with us, please contact Steven Kerr by email to skerr@doc.govt.nz.

Nāku noa, nā



Catherine Wilson
Director, Heritage and Visitors
Department of Conservation
Te Papa Atawhai

Document schedule

Item	Date	Document description	Decision
1.	Nov 2024	Consultation paper: Charging options for Basic and Bivvy Huts	Released in part – section 9(2)(a).
2.	Dec 2023	Great Walks Pricing Review (2023)	Released in full
3.	Dec 2023	Great Walks Price Review decision (2023)	Released in part – section 9(2)(a).
4.	Feb 2023	Pricing Performance Review (2023)	Released in full.
5.	March 2023	Pricing Performance Review decision (2023)	Released in part – section 9(2)(a).
6.	March 2024	Pricing Performance Review (2024)	Released in full.
7.	March 2024	Pricing Performance Review decision (2024)	Released in part – section 9(2)(a).
8.	Jan 2025	Campsite Price Review (2025)	Released in full.
9.	July 2022	Occupancy Thresholds for DOC Recreation Facilities	Released in full.
10.	Oct 2023	Briefing to SLT – Understanding pricing for facility user fees	Released in full.
11.	2019	Conservation General Policy (revised edition)	Publicly available.
12.	April 2005	General Policy for National Parks	Publicly available.
13.	May 2025 ²	The DOC Strategy	Publicly available.
14.	Jan 2021	Heritage and Visitor Strategy	Publicly available.
15.	Mar 2009	Hut Procurement Manual for Backcountry huts	Publicly available.
16.	Aug 2023	Visitor Risk Management Policy	Released in full.
17.	Jan 2024	Recreation facilities and services discount policy	Publicly available.
18.	April 2022	Recreation facilities and services pricing policy	Released in full.
19.	April 2022	Heritage and Visitors Business Planning Direction 2022	Released in full.
20.	Jan 2023	Heritage and Visitors Business Planning Direction 2023-24	Released in full.
21.	May 2024	Heritage and Visitors Business Planning Direction 2024	Released in full.
22.	Nov 2021	Strategic Directions for heritage and visitor capital expenditure	Released in full.
23.	Dec 2023	DOC Asset Management Strategy	Released in full.
24.	June 2024	Asset Management Policy	Released in full.

² Date the link was inserted into this letter.