

In Confidence

Office of the Minister of Conservation
Cabinet Economic Policy Committee

Charging for access to some public conservation land

Proposal

- 1 This paper seeks agreement to enable the Department of Conservation (**DOC**) to charge international visitors for access to some public conservation land (**PCL**).

Relation to government priorities

- 2 The proposals in this paper support economic growth by facilitating greater investment in tourism and conservation opportunities on PCL, including our world-class visitor experiences.

Executive Summary

- 3 The Department of Conservation (**DOC**), and the visitor experiences it offers, plays a critical role in supporting tourism and the Government's goal to grow the economy. Conservation tourism is estimated to be worth \$3.4 billion a year and is growing. Around 45% of international visitors visit national parks.¹
- 4 Currently, DOC does not have the legislative tools to charge visitors for access, as it is prohibited in conservation legislation.² Enabling charging for access and for the use of paths and tracks in conservation legislation would expand DOC's toolkit to cost recover and raise revenue for conservation activities at highly visited sites.
- 5 International tourists should contribute financially towards some of the experiences they are undertaking. While the International Visitor Conservation and Tourism Levy (**IVL**) goes some way to international visitors contributing to tourism and conservation outcomes, it only applies to around half of international visitors, as Australians (and visitors from some other countries) are exempt. Many international visitors undertake day walks or similar activities on PCL but cannot be charged due to the current prohibition on access and track charges.
- 6 I recommend that access charges are:
 - 6.1 set up as a new levy with revenue ringfenced for conservation, to deliver improved visitor experiences, and investment is prioritised in the locations where charges are introduced;
 - 6.2 enabled for international visitors only, with New Zealanders (citizens and ordinary residents) exempt, with a commitment to revisit this decision after the first five years;
 - 6.3 only introduced at sites with high international visitor numbers, or high infrastructure/facility costs for DOC, and where benefits of access charging exceed implementation costs; and

¹ International visitor survey, MBIE, 2024 year.

² Sections 17(1) & (2) of the Conservation Act 1987 and 4(2)(e) of the National Parks Act 1980.

- 6.4 initially investigated and consulted on at four popular sites which have the highest international visitor revenue potential – Milford Sound / Piopiotahi, Aoraki / Mount Cook, Cathedral Cove / Mautohe, and the Tongariro Alpine Crossing.
- 7 DOC estimates that introducing access charging for international visitors at the above four sites could raise \$62 million annually, based on a \$40 charge at larger sites and \$20 charge at smaller sites.
- 8 While access charging would be enabled through amendments to the Conservation Act and associated legislation, the specific sites and fees would be set through Order in Council. I do not anticipate access charges would be used at more than ten sites.

Background

The conservation system is facing considerable funding challenges

- 9 In August 2024, Cabinet agreed to my priorities for the conservation portfolio for this term, including to ‘Generate new revenue and recalibrate costs’ [ECO-24-MIN-0154] and my Revenue Action Plan to increase funding for conservation, diversify DOC’s revenue sources and grow the financial contributions from users [ECO-24-MIN-0152].³
- 10 DOC is facing considerable funding challenges from growing cost pressures, environmental risks such as climate change, ageing infrastructure and higher building costs due to remote locations. DOC receives funding from third-parties, as noted in Table One below, but most funding is provided by the Crown.

Table One: Examples of third-party revenue

	2023/24 \$ million	% of DOC’s total revenue
Recreational and tourism charges, and retail (includes huts/campsites/lodges (\$14.1m), Great Walks (\$8.9m) and retail sales (\$2.4m))	25.4	3.5%
Concessions, leases and licences and cost-recovery fees	29.3	4%
International Visitor Conservation and Tourism Levy (IVL)	35.6 ⁴	5%

- 11 The IVL has provided an additional revenue source, but it is not sufficient to deliver the desired scale of investment. The IVL is a more general charge of \$100 per person that applies at the border and does not apply to Australians, who make up around 40% of our international visitors. By contrast, New Zealanders who visit iconic sites in Australia, such as Uluru, are required to pay.

Legislation currently prohibits charging for access, despite being common overseas

- 12 Currently, DOC does not have the legislative tools to charge visitors for access, as it is prohibited in conservation legislation.⁵ Amending conservation legislation to enable charging for access and for the use of paths and tracks would expand DOC’s toolkit.

³ This includes actions already underway to increase revenue such as: trialling carpark charging, promoting greater donations, reviewing concession and hut pricing, and increasing the value of DOC’s partnerships.

⁴ In 2025/26, the IVL net contribution grows to \$55m (total contribution to DOC will be \$95m, but with a decrease from other Crown contributions of \$40m, resulting in a net increase of \$19.4m in 2025/26.)

⁵ Sections 17(1) & (2) of the Conservation Act 1987 and 4(2)(e) of the National Parks Act 1980.

- 13 For example, day walks are particularly popular with international visitors, and upgrading the quality and accessibility of tracks and paths can improve the visitor experience. Due to the current prohibition, DOC cannot charge for these experiences.

New Zealand's natural environment is central to its appeal as a tourist destination

- 14 Research shows that New Zealand's natural environment is central to its appeal as a tourist destination. Tourists are drawn to the pristine landscapes, rich biodiversity, and world-class outdoor experiences.
- 15 Approximately 45% of international visitors to New Zealand visit a national park and around 65% of visitors will do a walk or tramp while they are here. International tourists make up high proportions of visitors in some locations, e.g. 75% of visitors to Cathedral Cove / Mautohe, 88% to Aoraki / Mount Cook, and 80% to the Tongariro Alpine Crossing.

New investment can boost international tourism and regional economic growth

- 16 Generating greater revenue from international visitors will play a key role in enhancing visitor experiences. Some of our iconic tourist locations which draw significant visitor numbers are under pressure and require further investment to ensure these places remain world-class experiences.
- 17 The requirement to replace the No. 2 Bridge on the Hooker Valley Track has meant that this popular walk (attracting 150,000 plus visitors annually) will be closed until Autumn 2026. Visitors are unable to experience what is considered to be the most iconic walk in Aoraki Mount Cook National Park. DOC is finding visitors walking off track through fragile vegetation and rocky terrain taking photos, causing damage to the environment and putting themselves at risk. The new bridge is a significant investment in the future resilience of the Hooker Valley Track.
- 18 The closure of the Cathedral Cove walkway between February 2023 and December 2024 had a significant impact on the local community, with many of the annual 250,000 visitors likely choosing to visit other places. The reopening of Cathedral Cove has been an important part for the recovery of the region's tourism industry, with visitors bringing an estimated \$12 million into the region annually. \$5 million from the IVL has already been invested, and further investment is required to further strengthen and improve Cathedral Cove's infrastructure.
- 19 Milford Sound / Piopiotahi sees 1.1 million tourists visiting each year, contributing around \$200 million to the local economy. However, it has ageing and cluttered infrastructure which creates health and safety issues, tarnishes the visitor experience, and impacts the local environment. Cabinet has recently agreed to progress elements of the Milford Opportunities Project to transform the region into a world-class tourism drawcard. This requires significant investment, which is more likely with an access charge to fund it.

Public consultation revealed support for charging international visitors

- 20 Public consultation on access charging took place between 15 November 2024 and 28 February 2025 [ECO-24-MIN-0236]. Over 7,400 submissions were received including approximately 4,800 form submissions. The majority of submitters (63%) opposed charging for access. Key reasons cited were that freedom of access to PCL is

a basic right of New Zealand citizens, people already contribute to DOC through their taxes, and charges will create a financial barrier to access.

- 21 However, when asked who to charge, most submitters supported charging international visitors (72%). Submitters highlighted they would only support a charge if the revenue was ‘ringfenced’ as additional funding for conservation, and not substituted for existing Crown funding.
- 22 Feedback from tangata whenua groups emphasised that Iwi members and those with ahi kā connections to whenua should be involved in access charging decisions in their rohe, and that they supported either exempting all Māori from paying, or Iwi with mana whenua in that rohe.

Access charging is common internationally

- 23 The use of access charges for protected areas is common internationally with around 60 countries using them.⁶ This includes, for example, a \$13 day pass to Banff National Park in Canada, \$32 for a day pass to Yellowstone National Park, or a \$25 day pass to Freycinet National Park in Tasmania, Australia. Many international visitors expect to pay for entry to national parks or World Heritage Areas when they are visiting other countries.
- 24 Since September 2024, Te Papa has charged a \$35 entry fee for international visitors (16 years plus).

Enabling access charging for some areas of PCL

- 25 I propose that we enable DOC to charge international visitors to access some selected and popular areas of PCL, where charges can be practically implemented. This will support a fairer user pays system where international visitors contribute towards experiences they benefit from – for several of our iconic experiences, international visitors make up approximately 80% of all visitors.
- 26 An access charge will generate revenue that can be invested to improve visitor experiences, with flow on benefits to tourism and regional economic development. It aligns with Cabinet’s agreed principles for growing DOC’s third-party revenue: consistency with Government strategy and priority conservation outcomes; good return on investment; long-term sustainability; and simplicity in implementation [ECO-24-MIN-0152].

Access charges should be a levy with revenue ringfenced for improved visitor experiences

- 27 I propose access charges are implemented as a new levy and that revenue is ringfenced for improving the visitor experience within conservation land.
- 28 The purpose of this levy would be to fund the maintenance and enhancement of visitor experiences on conservation land controlled or managed by the Crown.⁷ This will enable the government to fund visitor infrastructure and services, and conservation work that contributes to international visitors’ overall experiences (e.g. activities to improve the opportunities for wildlife encounters, such as habitat restoration).

⁶ Parliamentary Commissioner for the Environment (2021) – “Not 100% - but four steps closer to sustainable tourism”

⁷ Conservation land includes land under the Conservation Act 1987, National Parks Act 1980 or Reserves Act 1977.

- 29 I will prioritise reinvesting levy revenue in and around the locations where it was generated, which is important for creating social license for the levy and ensuring delivery of high-quality visitor experiences. However, once investment needs at-place are met, the levy revenue can also be reinvested into the region where it was collected. Consideration will need to be given to how investment from the access levy sits alongside investment from the IVL. I propose to work with the Minister for Tourism and Hospitality to ensure there is alignment and minimal duplication.
- 30 To guide the allocation of revenue, I will develop investment principles to inform the high-level direction and priorities for access levy expenditure, which I will confirm with Cabinet. The Director-General of Conservation will manage day-to-day spending.
- 31 I recommend that all revenue raised from the levy be appropriated in full to DOC and that charges are administered by DOC. Having one accountable party (the Director-General of Conservation) that is responsible for reporting on expenditure (and changes in visitor outcomes) is the most efficient way for ensuring transparency and robust reporting on revenue and expenditure.
- 32 While DOC will be responsible for collecting the levy, other parties will be able to collect on DOC's behalf where it makes sense for administrative simplicity (e.g. concessionaires collecting the visitor's access levy as part of their fee for services in those areas).

I propose exempting New Zealanders, with a commitment to review in five years

- 33 I propose that we enable access charges only for international visitors in primary legislation, with New Zealanders (New Zealand citizens and those ordinarily resident) being exempt.⁸ Charging New Zealanders would require further legislative amendments, and therefore Parliamentary consent, if a future Government decided to pursue this.
- 34 Exempting New Zealanders from the levy ensures that they can continue to freely access PCL ^{9 (2) (g) (i)} [REDACTED]
[REDACTED] It also aligns with submission feedback that if an access levy was introduced, it should only apply to international visitors.
- 35 Exempting New Zealanders from the levy will result in slightly lower revenue (an estimated \$5 million less annually for the four initial sites) based on an assumption that New Zealanders would pay less than international visitors and make up a smaller percentage of overall visitors to the four sites identified for access charging.
- 36 There may be some justification for offering a levy discount or exemption for some groups of international visitors (e.g. children or disabled people) or providing a one-off waiver of the levy (e.g. visiting international science team). I am recommending the ability to set discounts, exemptions and waivers is enabled through primary legislation, with the specifics of discounts/exemptions and levy charges in regulations.

⁸ This is the current eligibility criteria for Great Walks facility fees. For someone to be 'ordinarily resident' in New Zealand they need to have lived in New Zealand for 6-months or more.

- 37 I propose that there is a review of the levy after five years to consider who the levy applies to. This would enable the Government to draw on the knowledge and data generated by the first five years of the international visitor access levy to consider whether changes are required.

Access charges for international visitors can raise revenue to support world-class visitor experiences

- 38 Based on a conservative access levy per international visitor of \$40 at larger sites and \$20 at smaller sites, a levy could generate an estimated yearly revenue of \$34 - \$83 million (with a midpoint of \$62 million) at the proposed initial four sites. For context, \$62 million equates to nearly 9% of DOC's current operating budget in 2025/26.
- 39 Operational costs are estimated at 9 (2) (i), with initial capital expenditure of 9 (2) (i). Collection of the access charge could be operationalised differently depending on the location. Initial costs will be met through DOC baselines, but ongoing costs, including administration, will be self-funded through the levy. The net present value of an access levy at these four sites is 9 (2) (i) for five years (with the first year being implementation with zero revenue). Further information on cost benefit analysis undertaken and related assumptions can be found in Appendix 1.
- 40 Improved facilities and experiences will likely attract more visitors in the longer term. International experience, and analysis from the Milford Opportunities Project, suggests an access charge (similar to international rates) would have little impact on visitor demand for iconic sites.⁹ International visitors are much more likely to pay if revenue is reinvested in the place it was generated.

I propose applying criteria to limit the use of access charges to specific parts of PCL

- 41 Access charges will not be appropriate or effective in every, or even most, parts of PCL. In many areas, implementation costs may outweigh the revenue raised due to low visitor numbers and/or high monitoring and enforcement costs.
- 42 I propose that there are criteria for where we would introduce an access levy, and that these criteria are included in legislation:
- 42.1 sites that are iconic and popular, with high international visitor numbers; or
- 42.2 sites that have high visitor infrastructure and facility costs; and
- 42.3 where the benefits of introducing access charges exceed operational costs.
- 43 Using these criteria, which were supported in public feedback, I propose investigating four initial sites for access charging, as outlined in Table Two below. Based on initial modelling, these four sites will generate significant net revenue.

Table Two: Initial proposed sites for implementing access charges

Site	Annual visitor numbers	Percentage of internationals
Aoraki / Mt Cook	1m	88%
Milford Sound / Piopiotahi	1.1m	90%

⁹ Research shows that 80% of international visitors would be willing to pay an access fee of \$90-110 to enter Milford Sound. The percentage rises close to 100% as the charge lowers to \$50.

Cathedral Cove / Mautohe	250k	75%
Tongariro Alpine Crossing	100k	80%

- 44 Further sites can be investigated and may be added over time, 9 (2) (f) (iv) [REDACTED]
[REDACTED] I do not anticipate we would have access charging at more than ten sites total.

Implementation

- 45 Alongside the legislative process, DOC will investigate the introduction and design of access charges at the first four proposed sites.
- 46 This will include market research, price sensitivity analysis, business cases, costings for implementation options, and considering interactions with any other existing charges (e.g. concessions, carpark charging). I will also consult with the Minister for Treaty of Waitangi Negotiations as part of this process, to avoid prejudicing any current or future negotiations. There will then be targeted consultation with concessionaires, local communities and Iwi for feedback on implementation considerations, as required for the development of regulations.
- 47 I propose the introduction of an infringement offence in legislation for levy-related infractions by visitors (e.g. entering an area with a levy without paying). The infringement fee will be determined in regulation as part of implementation design. It will supplement DOC's existing compliance tools and methods, which focus on education and communication in the first instance.
- 48 Implementation, administration and operational costs associated with the levy are estimated to be 9 (2) (i) [REDACTED] over the first five years. These estimates will be refined as part of site investigations.
- 49 9 (2) (f) (iv) [REDACTED]
- 50 Relevant planning documents, including the National Conservation Policy Statement (NCPS) and area plans, will be drafted to reflect access charging being enabled.
- 51 DOC will also consider whether stronger visitor management tools are needed to address visitor pressures in these locations, using existing legislative settings. These tools could include capping visitor numbers at certain times of the day or year, introducing booking systems, or other measures. Using visitor management measures alongside charging will help ensure that DOC continues to provide quality experiences, and the natural environment is protected.

10 9 (2) (g) (i) [REDACTED]

Next steps

- 52 If Cabinet agrees to the recommendations in this paper, officials will work with the Parliamentary Counsel Office (**PCO**) to draft provisions to go into the Conservation Amendment Bill in the second half of this year. These changes will be included in the Bill making wider changes on Modernising Conservation Land Management processes recently considered by Cabinet [ECO-25-MIN-0096 refers].
- 53 I will seek Cabinet decisions on secondary legislation for the access levy next year, as well as levy design settings, allocation of revenue, and whether to proceed with introducing an access levy at the four proposed locations.

Cost-of-living Implications

- 54 There are no cost-of-living implications for New Zealanders.

Financial Implications

- 55 Introducing an access levy at four popular locations in New Zealand could raise an estimated \$34 - \$83 million (with a midpoint of \$62 million) per year of gross revenue for conservation. Upfront implementation costs of this proposal will be met from DOC's existing baseline. Once implemented, the scheme will be effectively 'self-funding'.
- 56 The Minister of Conservation and Minister of Finance will agree on the financial mechanisms to give effect to setting up the levy. The mechanism will track the revenue and expenditure of the proposed levy. I will report back on this at the same time as seeking agreement to secondary legislation.

Legislative Implications

- 57 These policy decisions will be included in the broader Conservation Amendment Bill [ECO-25-MIN-0096 refers], which holds a category 5 priority on the 2025 Legislation Programme (to be referred to select committee within the year) and will bind the Crown.

Impact Analysis

Regulatory Impact Statement

- 58 Cabinet's impact analysis requirements apply to these policy proposals. A Regulatory Impact Statement (**RIS**) has been prepared by DOC and is attached in Appendix 2.
- 59 The Regulatory Impact Analysis Panel, which includes members from the Department of Conservation, the Ministry for Regulation, and the Ministry of Transport, has reviewed the RIS titled "Charging for Access to Some Public Conservation Land," dated 9 July 2025. The panel considers that the RIS partially meets the Quality Assurance criteria.
- 60 While the RIS identifies some options for aligning revenue streams with cost drivers, it does not explore the full range of possibilities, as certain options were excluded by Ministerial direction. Additionally, the presentation of costs and benefits for each option could be more balanced. The RIS also notes that substantial information gaps exist, making it challenging to compare options comprehensively, and that time constraints limited the ability to address these gaps.

- 61 To ensure that the preferred options represent a more efficient solution for the Crown compared to the status quo, it will be important to conduct further careful analysis and gather more robust quantitative information in subsequent stages of the RIS. This will help provide Ministers with the confidence that the benefits of imposing a levy on any specific site outweigh the potential costs and implementation risks.

Climate Implications of Policy Assessment

- 62 The policy proposals in this paper do not have any climate implications.

Population Implications

Rural communities

- 63 Improving infrastructure and experiences through investment of levy revenue will likely increase international tourism receipts and boost regional development opportunities.

Human Rights

- 64 My proposal does not include a prohibited ground of discrimination under the Human Rights Act 1993, making it consistent with section 19 of the Bill of Rights Act 1990 (BORA). It is also consistent with the right to freedom of movement under section 18 of BORA. Even if it was viewed as an infringement of rights under BORA, I consider such limits would be found to be reasonable. International visitors are contributing towards costs they impose, and the upkeep and improvement of the experiences they enjoy.

Use of External Resources

- 65 Consultants from MartinJenkins assisted with submissions processing and analysis.

Consultation

- 66 Public consultation took place from November 2024 to February 2025.
- 67 The following agencies were consulted on this Cabinet paper: the Treasury, Ministry of Business Innovation and Employment (Tourism), Ministry for the Environment, Department of Prime Minister and Cabinet, Land Information New Zealand, Ministry for Primary Industries, Te Puni Kōkiri, Te Arawhiti, Ministry for Regulation, Ministry of Transport, Department of Internal Affairs, Ministry of Justice, and Ministry of Foreign Affairs and Trade.

Communications

- 68 I intend to make an announcement regarding the reforms to modernise Conservation land management and access charging within the next week.

Proactive Release

- 69 I intend to proactively release this paper within 30 business days of decisions being confirmed by Cabinet, subject to redaction as appropriate under the Official Information Act 1982.

Recommendations

The Minister of Conservation recommends that the Committee:

- 1 **note** the Cabinet Economic Policy Committee invited the Minister of Conservation to report back in 2025, following public consultation, to seek final policy decisions for access charging and agreement to issue drafting instructions [ECO-24-MIN-0236];
- 2 **agree** to amend conservation legislation (Conservation Act 1987, National Parks Act 1980, and Reserves Act 1977) to enable the Department of Conservation to charge international visitors (non-citizens and those not ordinarily resident) for access to some public conservation land that is administered and managed by the Crown, by:
 - 2.1 removing or amending any provisions that guarantee free public access to public conservation land;
 - 2.2 removing any prohibitions on the Crown charging for tracks and paths;
- 3 **agree** to establish access charges as a new levy, with revenue ringfenced for the purpose of maintaining and enhancing the visitor experience on conservation land;
- 4 **agree** to revisit who is required to pay the levy in five years, based on the data and experience from international visitors, to determine whether New Zealanders should continue to be exempt, and consider any other required changes;
- 5 **agree** the following criteria are included in primary legislation as the basis for the Minister of Conservation proposing sites to introduce an access levy:
 - 5.1 sites that are iconic and popular, with high international visitor numbers; or
 - 5.2 sites with high visitor infrastructure and facility costs; and
 - 5.3 the benefits of introducing the levy exceed the costs;
- 6 **agree** that an access levy will be investigated at the following initial four sites, and this investigation will include consultation with Iwi, local communities and concessionaires: Piopiotahi / Milford Sound, Aoraki / Mount Cook, Mautohe / Cathedral Cove and Tongariro Alpine Crossing;
- 7 **agree** the following levy-making and collection powers be included in primary legislation:
 - 7.1 regulation-making powers to enable key aspects of levy implementation including: the levy payable by different visitor groups, locations where the levy will apply and the rates payable, and the collection of revenue by other parties (such as concessionaires) on behalf of the Director-General;
 - 7.2 allowing the setting of exemptions and discounts for different types of visitor groups (with details set out in regulations);
 - 7.3 requiring the Director-General of Conservation to collect (or authorise others to collect) the levy on behalf of the Crown;
 - 7.4 requiring the Department of Conservation to undertake targeted engagement with Iwi, local communities and concessionaires on regulations to establish access charges at new locations and to make any major changes or updates to

- access charges once they are in place (with no consultation requirement for minor or technical changes, such as boundaries or CPI adjustments);
- 7.5 requiring the Minister of Conservation to review the levy and associated secondary legislation every five years;
- 7.6 requiring the Director-General of Conservation to report on revenue collection and expenditure every year;
- 7.7 allowing the Director-General of Conservation to waive (in total or part) payment of the levy by any groups or persons; and
- 7.8 giving the Department of Conservation the power to monitor the payment of the levy by visitors and enabling new enforcement options, including new infringement offences related to entering an area with an access levy without paying;
- 8 **invite** the Minister of Conservation to issue drafting instructions to Parliamentary Counsel Office for a Bill that amends conservation legislation as required to implement these recommendations;
- 9 **note** the Conservation Amendment Bill holds a category 5 priority on the 2025 Legislation Programme (to be referred to select committee within the year);
- 10 **authorise** the Minister of Conservation to make decisions consistent with these recommendations on any minor or technical matters that may arise during the legislative drafting process;
- 11 **note** the Minister of Conservation will amend any relevant conservation general policy, (e.g. new National Conservation Policy Statement and area plans) to reflect the introduction of charges, once agreed, without the normal consultation requirements;
- 12 9 (2) (f) (iv) [REDACTED]
- 13 **note** the Minister of Conservation will consult with the Minister for Treaty of Waitangi Negotiations before confirming sites for the access levy;
- 14 **note** the Minister of Conservation will seek Cabinet decisions on secondary legislation for the access levy next year, as well as levy design settings, allocation of revenue, and whether to proceed with introducing an access levy at the four proposed locations.

Authorised for lodgement

Hon Tama Potaka

Minister of Conservation

Appendix 1 – Cost benefit analysis and assumptions

High-level estimates of levy revenue and costs

This cost benefit analysis is based on the four sites proposed for initial investigation for an access levy (**Table A**) and considers two options: charging all visitors (both New Zealand and international visitors) or charging only international visitors (proposed).

Table A: Proposed initial access levy locations and annual visitor numbers*

Likely initial levy location		New Zealand visitor numbers (000s)	International visitor numbers (000s)	Total Visitors (m)
Larger	Piopirotahi/Milford Sound	110	990	1.1m
	Aoraki/Mount Cook	120	880	1.0m
Smaller	Mautohe/Cathedral Cove	63	188	0.3m
	Tongariro Alpine Crossing	20	80	0.1m
Total				2.5m

*Based on 2020 – 2024 visitor numbers

Indicative levy amount and estimated levy revenue

No decisions have been made on levy amounts. However, existing willingness-to-pay data like that collected by the Milford Opportunities Project and international examples provide a guide for the potential range of the levy.¹¹ International examples of national park entry fees include: China (\$58), Nepal (\$46), Argentina (\$45), USA (\$23) and Australia (\$10).¹²

The following range of levy amounts have been used to provide an annual gross revenue estimate (**Table B**). International visitors are assumed to pay twice the levy amount of New Zealand visitors (a two-times differential price). These were then adjusted by $\pm 50\%$ to provide a range for the revenue estimates in **Table C**.

Table B: Assumed levy amounts

	New Zealand citizens and ordinarily residents			International visitors		
Levy amount range	50%	0	150%	50%	0	150%
Smaller experiences	\$5	\$10	\$15	\$10	\$20	\$30
Larger experiences	\$10	\$20	\$30	\$20	\$40	\$60

Table C: Gross annual revenue estimates

	Charging New Zealand and international visitors			Charging international visitors (Proposed)		
Levy amount range	50%	0	150%	50%	0	150%

¹¹ See Kantar. (2021). *Milford Opportunities Project masterplan: International consumer insights*. <https://www.milfordopportunities.nz/assets/Milford-Opportunities-Project-Masterplan-International-Consumer-1.pdf>.

¹² Adjusted for inflation and converted to NZD from USD. See Van Zyl H, Kinghorn J & Emerton L (2019) National park entrance fees: A global benchmarking focused on affordability. *PARKS*, 25(1). https://www.parksjournal.com/wp-content/uploads/2019/05/PARKS-25.1-Van-Zyl-10.2305-IUCN.CH_2019.PARKS-25-1HVZ.en_-1.pdf

Gross annual revenue estimate	\$36m	\$67m	\$90m	\$34m	\$62m	\$83m
Visitor numbers	2.4m	2.3m	2.0m	2.4m	2.3m	2.0m

Assumptions underlying the annual gross revenue estimates

The annual gross revenue estimates in **Table C** are preliminary and are based on the following assumptions: levy sites in **Table A** and levy amounts in **Table B**; 70% of visitors (New Zealand and international) being willing to pay \$100 to access larger experiences and \$50 to access smaller experiences;¹³ inelastic demand within the levy amount range given; no induced demand from spending revenue; non-compliance of 15% by visitors.

Indicative implementation, administration and operational costs

Net revenue is challenging to estimate before detailed implementation planning. Some costs are highly site specific and will depend on interactions with DOC's existing visitor management interventions. Preliminary costs are estimated in **Table D** for the implementation, administration and operation of the levy.

Table D: Estimate of levy costs and revenue (based on the levy price in Table B above)

	5-Year Present Value of access levy (\$ millions)	
	Charging New Zealand and international visitors	Charging international visitors
Operating expenditure (OPEX)	9 (2) (i)	9 (2) (i)
Capital expenditure (CAPEX)	9 (2) (i)	9 (2) (i)
Gross levy revenue	254.8	236.6
Net present value revenue	9 (2) (i)	9 (2) (i)

9 (2) (i)

[REDACTED]

¹³ See Kantar. (2021).

9 (2) (i)

9 (2) (i)

Appendix 2 – Regulatory Impact Statement



Cabinet Economic Policy Committee

Minute of Decision

This document contains information for the New Zealand Cabinet. It must be treated in confidence and handled in accordance with any security classification, or other endorsement. The information can only be released, including under the Official Information Act 1982, by persons with the appropriate authority.

Charging for Access to Some Public Conservation Land

Portfolio Conservation

On 16 July 2025, the Cabinet Economic Policy Committee (ECO):

- 1 **noted** that in August 2024, ECO approved public consultation on charging for access to some public conservation land and invited the Minister of Conservation (the Minister) to report back to seek agreement to final policy decisions [ECO-24-MIN-0236];
- 2 **agreed** to amend conservation legislation (Conservation Act 1987, National Parks Act 1980, and Reserves Act 1977) to enable the Department of Conservation (DOC) to charge international visitors (non-citizens and those not ordinarily resident) for access to some public conservation land that is administered and managed by the Crown, by:
 - 2.1 removing or amending any provisions that guarantee free public access to public conservation land;
 - 2.2 removing any prohibitions on the Crown charging for tracks and paths;
- 3 **agreed** to establish access charges as a new levy, with revenue ringfenced for the purpose of maintaining and enhancing the visitor experience on conservation land;
- 4 **agreed** to revisit who is required to pay the levy in five years, based on the data and experience from international visitors, to determine whether New Zealanders should continue to be exempt, and consider any other required changes;
- 5 **agreed** that the following criteria be included in primary legislation as the basis for the Minister proposing sites to introduce an access levy:
 - 5.1 sites that are iconic and popular, with high international visitor numbers; or
 - 5.2 sites with high visitor infrastructure and facility costs; and
 - 5.3 the benefits of introducing the levy exceed the costs;
- 6 **agreed** that an access levy be investigated at four initial sites: Piopiotahi / Milford Sound, Aoraki / Mount Cook, Mautohe / Cathedral Cove and Tongariro Alpine Crossing, and that this investigation include consultation with Iwi, local communities and concessionaires;

- 7 **agreed** that the following levy-making and collection powers be included in primary legislation:
- 7.1 regulation-making powers to enable key aspects of levy implementation, including: the levy payable by different visitor groups, locations where the levy will apply and the rates payable, and the collection of revenue by other parties (such as concessionaires) on behalf of the Director-General of Conservation (Director-General);
 - 7.2 allowing the setting of exemptions and discounts for different types of visitor groups (with details set out in regulations);
 - 7.3 requiring the Director-General to collect (or authorise others to collect) the levy on behalf of the Crown;
 - 7.4 requiring DOC to undertake targeted engagement with Iwi, local communities and concessionaires on regulations to establish access charges at new locations and to make any major changes or updates to access charges once they are in place (with no consultation requirement for minor or technical changes, such as boundaries or CPI adjustments);
 - 7.5 requiring the Minister to review the levy and associated secondary legislation every five years;
 - 7.6 requiring the Director-General to report on revenue collection and expenditure every year;
 - 7.7 allowing the Director-General to waive (in total or part) payment of the levy by any groups or persons;
 - 7.8 giving DOC the power to monitor the payment of the levy by visitors and enabling new enforcement options, including new infringement offences related to entering an area with an access levy without paying;
- 8 **invited** the Minister to issue drafting instructions to the Parliamentary Counsel Office for a Bill that amends conservation legislation as required to implement the above paragraphs;
- 9 **noted** that the Conservation Amendment Bill holds a category 5 priority on the 2025 Legislation Programme (to be referred to select committee by the end of 2025);
- 10 **authorised** the Minister to make decisions consistent with the above paragraphs on any minor or technical matters that may arise during the legislative drafting process;
- 11 **noted** that the Minister will amend any relevant conservation general policy, (e.g. new National Conservation Policy Statement and area plans) to reflect the introduction of charges, once agreed, without the normal consultation requirements;
- 12 **9 (2) (f) (iv)**
- 13 **noted** that the Minister will consult with the Minister for Treaty of Waitangi Negotiations before confirming sites for the access levy;

- 14 **noted** that the Minister will seek Cabinet decisions in 2026 on secondary legislation for the access levy, as well as levy design settings, allocation of revenue, and whether to proceed with introducing an access levy at the four proposed locations.

Rachel Clarke
Committee Secretary

Present:

Hon David Seymour
Rt Hon Winston Peters
Hon Nicola Willis (Chair)
Hon Simeon Brown
Hon Shane Jones
Hon Erica Stanford
Hon Paul Goldsmith
Hon Louise Upston
Hon Dr Shane Reti
Hon Tama Potaka
Hon Chris Penk
Hon Penny Simmonds
Hon Andrew Hoggard
Hon Mark Patterson
Hon James Meager
Hon Scott Simpson
Simon Court MP

Officials present from:

Office of the Prime Minister
Office of Hon Erica Stanford
Officials Committee for ECO

Regulatory Impact Statement: Charging for access to some public conservation land

Decision sought	Cabinet agreement to amend legislation to introduce the ability to charge for access to some public conservation land
Agency responsible	Department of Conservation
Proposing Ministers	Hon Tama Potaka, Minister of Conservation
Date finalised	10 July 2025

Description

The Government intends to amend the visitor charging powers provided in the Conservation Act 1987, National Parks Act 1980 and Reserves Act 1977, to introduce the ability to charge a levy for access to defined areas of public conservation land with visitor facilities.

Summary: Problem definition and options

What is the policy problem?

With growing visitor numbers and increasing risks to biodiversity, current funding for the Department of Conservation (**DOC**) is inadequate to manage the upkeep of public conservation land (**PCL**).

The policy problem has two elements:

- **Funding** – DOC’s funding is insufficient to meet its medium- to long-term obligations. This limits its ability to deliver and maintain conservation outcomes and other societal benefits. DOC will have to reduce its activities to match available funding (e.g. less pest-control, scale back recreational facilities that support access to PCL). This has negative impacts for conservation, recreation, tourism and economic growth.
- **Equity** – Current legislation prevents DOC from charging for access to tracks and paths. This means only some visitors (e.g. those using huts) pay fees, while others (e.g. day walkers) still use resources but do not contribute. This results in unfair cost distribution between some visitors and the Crown.

What is the policy objective?

The primary objectives of this proposal are to:

- provide DOC with the tools to charge visitors in a more equitable way, so visitors contribute towards the experiences they enjoy the benefit from
- improve visitor experiences on PCL, funded from increased visitor revenue.

The secondary policy objectives are to:

- uphold the Crown's obligations under the Treaty of Waitangi
- ensure that the benefits of recreation and tourism on PCL, such as economic, health, wellbeing, and cultural benefits, are maintained and improved over time.

What policy options have been considered, including any alternatives to regulation?

Option 1 – Status Quo

The current balance of Crown and user funding within Vote Conservation is maintained, with continued implementation of the Government's Revenue Action Plan for Conservation, as discussed in *Section 1*. Charging for access to PCL continues to be restricted.

Option 2 – Voluntary charges (non-regulatory)

Visitors are encouraged to make a voluntary contribution at the trailhead or when booking. Charging for access to PCL would continue to be restricted.

Option 3 – Increase and expand existing facility charging powers (non-regulatory)

Expand the use of existing facility charging powers and increase prices significantly where charges are already in place (e.g. huts and campsites). For example, this could be an expansion in the planned carpark charging pilot, increasing from the three planned pilot sites to cover many more sites around New Zealand. Charging for access to PCL would continue to be restricted.

Option 4A [DOC preferred] – Introduce a new levy power to charge visitors for access (regulatory)

The Conservation Act, National Parks Act and Reserves Act are amended to introduce a levy making power for access. This levy would fund the maintenance of PCL and enhancement of visitor experiences. Differential pricing, exemptions and discounts would be enabled in regulations.

Option 4B [Minister preferred] – Introduce a new levy power to charge only international visitors for access (regulatory)

Same as Option 4A, but the levy would apply only to international visitors, with New Zealand citizens and individuals ordinarily resident in New Zealand ("New Zealanders") not subject to the charges. This distinction would be clearly established in primary legislation. For someone to be ordinarily resident in New Zealand they need to have lived in New Zealand for six-months or more. This option could be combined with a variation of voluntary payments (Option 2) for New Zealand citizens and individuals ordinarily resident.

What consultation has been undertaken?

Public consultation on charging for access to some public conservation land ran from November 2024 to February 2025. DOC held 25 hui with Iwi, four stakeholder meetings, and four public sessions, receiving 7,412 submissions. Most submitters opposed charging New Zealanders but supported charging international visitors. Further consultation will be undertaken as part of developing regulations.

Is the preferred option in the Cabinet paper the same as preferred option in the RIS?

No, DOC prefers Option 4A. The Minister's preferred option in the Cabinet paper is Option 4B.

Summary of preferred options

Option 4A and 4B: Monetary cost benefit table

Present value (\$ millions)		
Five year total	Option 4A (DOC preferred)	Option 4B (Minister preferred)
Cost	9 (2) (i)	9 (2) (i)
Gross revenue	254.8	236.6
Net present value	9 (2) (i)	9 (2) (i)

See *High-level estimates of levy revenue and costs* on page 34 for the full list of assumptions for net revenue figures and cost benefit analysis.

DOC's preferred – Option 4A Introduce a new levy power to charge visitors for access

Benefits (dependant on levy spending / revenue allocation decisions)	
Department of Conservation (the regulator)	Benefits from collecting an estimated gross revenue of \$36–90 million per year from visitors. This is based on inelastic demand. If demand is elastic, higher charges could lead to a reduction in visitor numbers, resulting in lower-than-expected revenue.
Visitors (regulated party)	Benefit from levy spending on higher quality facilities and greater connection to nature due to biodiversity improvement programmes funded by levy revenue.
Concessionaires	Benefit from levy spending on a higher number of experiences on PCL that are desirable (and suitable) for a wider range of visitors, providing an increased number of clients and potentially increasing their willingness to pay.
Iwi and Hapū	Could benefit from levy spending on increasing their cultural presence on PCL (e.g. signs with storytelling).
The environment	Benefits from levy spending on biodiversity improvements. This could include initiatives such as breeding programmes and pest control. Also potential benefit from levy spending on visitor facilities that reduce environmental impacts (e.g. boardwalks to protect wetlands).
Costs	
Department of Conservation (the regulator)	Would be responsible for the implementing, administering and enforcing the levy. Implementation costs could either be covered by the International Visitor Conservation and Tourism Levy (IVL) or through existing conservation funding. Until sufficient levy revenue

	accumulates to cover ongoing administration and enforcements costs, these costs would be met through existing funding. Operational and capital expenditure to implement, operate and administer the levy under Option 4A is estimated at 9 (2) (i) over five years.
Visitors (regulated party)	Would pay the cost of the levy, estimated to be a financial transfer of \$36–90 million per year from visitors to DOC. If visitors are dissuaded from visiting PCL, any foregone personal benefits from their potential visit are also lost alongside wider public benefits such as to national identity and culture.
Concessionaires	May pay some costs associated with ensuring client compliance and meeting any reporting requirements. However, these are expected to be minimal as they would be incorporated into existing concession processes. Potential for reduced profits due to lower visitor numbers in the short to medium term, and/or visitors having less disposable income.
Iwi and Hapū	Iwi and Hapū may find it more difficult to maintain their kaitiaki relationships on PCL due to additional price and administrative barriers (non-monetary cost). They may also incur some costs associated with engagement with DOC on levy settings.
Businesses (excluding concessionaires)	Potential for reduced profits due to possible lower international arrival numbers if New Zealand is viewed as a higher cost tourism destination, and/or international visitors having less disposable income.
Balance of benefits and costs	
As demonstrated in the summary table, the benefits of Option 4A would outweigh the costs. 9 (2) (i). Whether monetary benefits outweigh non-monetary costs will depend on the decision makers' weighting of non-monetary costs.	

Minister's preferred option – Option 4B Introduce a new levy power to charge only international visitors for access

Benefits (that are different from Option 4A) (dependant on levy spending / revenue allocation decisions)	
Department of Conservation (the regulator)	Benefits from collecting an estimated gross revenue of \$34–83 million per year from international visitors. This is based on inelastic demand. If demand is elastic, higher charges could lead to a reduction in visitor numbers, resulting in lower-than-expected revenue.
Costs (that are different from Option 4A)	
Department of Conservation (the regulator)	Operational and capital expenditure on the levy under Option 4B is estimated to cost 9 (2) (i) over five years.

International visitors (regulated party)	Would pay the cost of the levy, estimated to be a financial transfer of \$34–83 million per year from international visitors to DOC.
New Zealand visitors (regulated party)	No cost.
Iwi and Hapū	No cost.
Balance of benefits and costs	
As demonstrated in the summary table, the benefits of Option 4B would outweigh the costs. 9 (2) (i) . Whether monetary benefits outweigh non-monetary costs will depend on the decision makers weighting of non-monetary costs.	

Implementation

If the Government progresses with legislation that enables DOC to charge for access to PCL, this would be implemented through new regulations. DOC would be responsible for its ongoing operation and enforcement. The levy could be collected online, on site and/or through a concessionaire. The details of any new levy and associated regulations will be analysed in subsequent regulatory impact statements (RIS).

There are risks to the successful implementation of Option 4A/Option 4B to satisfy the objectives outlined in this RIS. They include:

- **Lack of public buy in** – resulting in low compliance and risks to staff health and safety and infrastructure vandalism.
- **Negative impacts on DOC's relationships with local Iwi and stakeholders** – potentially resulting in more difficult implementation, legal challenges, and delays.
- **Visitor impacts and redistribution** – risk that prices may deter visitors from visiting PCL, or push visitors to less-prepared or more ecologically sensitive areas.
- **Reduction in Crown funding** – partially or fully offsetting levy revenue, negating the benefits from improved conservation outcomes and visitor facilities.

Additional risks could include congestion, lack of authority over adjacent areas (roads, foreshore), integration issues, and unexpected costs.

All the risks identified above could be mitigated through careful design of regulations, clear communication with stakeholders, pricing strategy, and evaluation and review of any proposed changes. Full consideration of the implementation risks will be conducted as part of the assessment of any future regulations that will give effect to the new levy.

Limitations and constraints on analysis

A key constraint on the analysis is that a full assessment of the options requires balancing technical considerations (monetary value) with non-monetary value (e.g. heritage, psychological wellbeing, social license). Costs and benefits associated with non-monetary value are difficult to quantify and depend on how the decision-maker weights this type of value. This RIS focusses on the technical and quantifiable aspects of any legislative change and how they meet objectives. Where possible, DOC has identified areas of non-monetary value to aid decision makers and the public to understand the potential impact of the options. Different decision-makers may weigh the values-based criteria in this RIS differently (e.g. Treaty of

Waitangi, supports recreation). In turn, this may impact their assessment of the appropriate balance between the costs and benefits of each option.

The cost benefit analysis in this RIS assumes that levy revenue will be additional to existing Crown funding and will be spent in line with the levy purpose.

There is limited evidence of:

- **the monetary and non-monetary value of access to PCL.** This has made it difficult to assess the relative cost associated with price barriers. However, we know that non-monetary value exists, including physical, psychological, personal and spiritual factors.¹ The evaluation of options by a decision-maker may differ depending on how they weigh non-monetary costs.
- **the willingness to pay data of visitors to PCL.** Some willingness to pay data exists for a potential access charge for international visitors to Milford Sound (refer to options analysis in Section 2). This evidence gap makes it difficult to assess the potential impact of the proposed levy. When site specific regulations are progressed willingness to pay surveys will be undertaken.
- **the cost of implementation and administering the levy.** DOC will engage with international counterparts and private vendors to gain a better understanding of what implementation options and associated costs will be, as regulations are developed. This will inform the next RIS.
- **non-users and international visitors' views.** Our analysis of submissions indicates it is likely that the majority of the feedback on the public consultation came from New Zealand users of PCL. This has made it difficult to determine what the potential impacts might be on non-users or potential future users.
- **potential visitor impact on sites.** Indicative sites have been used for this analysis, so actual impacts may vary once sites are finalised. Impacts for specific sites will be assessed in a separate RIS when site-specific regulations are progressed.

Due to time constraints, analysis and data collection to fill the information gaps has been limited. As a result, the analysis of this RIS has been limited to considering the introduction of an access levy power. Business cases and detailed site specific RIS(s) will follow, supported by additional evidence.

The options are also limited by the Government's decision to rule increases to the IVL out of scope. The Government recently increased the IVL amount from \$35 to \$100 per person in October 2024. Changes to include Australians within the IVL are also out of scope for the same reason.

¹ For example, see "What makes an outdoors place special" - Department of Conservation. (2020). *Survey of New Zealanders 2020*. <https://www.doc.govt.nz/globalassets/documents/about-doc/role/visitor-research/survey-of-new-zealanders-2020.pdf>.

I have read the Regulatory Impact Statement and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the preferred option.

Responsible Manager(s) signature:

9 (2) (a)



James Johnson
Budget and Funding Policy
Department of Conservation

10 July 2025

Quality Assurance Statement

Reviewing Agency: The Department of Conservation, Ministry for Regulation and Ministry of Transport

QA rating: Partially meets

Panel Comment:

The Regulatory Impact Analysis Panel, which includes members from the Department of Conservation, the Ministry for Regulation, and the Ministry of Transport, has reviewed the Regulatory Impact Statement (RIS) titled “*Charging for Access to Some Public Conservation Land*,” dated 9 July 2025. The panel considers that the RIS partially meets the Quality Assurance criteria.

While the RIS identifies some options for aligning revenue streams with cost drivers, it does not explore the full range of possibilities, as certain options were excluded by Ministerial direction. Additionally, the presentation of costs and benefits for each option could be more balanced. The RIS also notes that substantial information gaps exist, making it challenging to compare options comprehensively, and that time constraints limited the ability to address these gaps.

To ensure that the preferred options represent a more efficient solution for the Crown compared to the status quo, it will be important to conduct further careful analysis and gather more robust quantitative information in subsequent stages of the RIS. This will help provide Ministers with the confidence that the benefits of imposing a levy on any specific site outweigh the potential costs and implementation risks.

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Section 1: Diagnosing the policy problem

Context

Overview of Te Papa Atawhai / the Department of Conservation

2. The Department of Conservation (DOC) is a medium-sized government department. DOC leads the government's work in the conservation system and administers public conservation land (PCL). DOC manages a third of New Zealand's land mass, including national parks, and marine reserves.
3. Most people who live in, or visit, New Zealand are likely to have come across DOC's iconic green and yellow signs. In 2023/24, around 80 per cent of New Zealanders visited PCL at least once, and around half of New Zealanders visited at least once a month. Over 2024 around 65 per cent of international visitors did a walk or tramp and 45 per cent said they visited one or more national parks during their time in New Zealand. DOC has staff placed in over 100 locations across New Zealand to maintain the large workload across the country. Its roles include:
 - **Management of Natural Heritage**, for maintaining, restoring and protecting ecosystems, habitats and species across PCL and waters.
 - **Management of Recreational Opportunities**, for the maintenance and management of recreational facilities and services including more than 2,000 buildings and huts, 300 camp sites, 13,000 structures and 14,600 kms of tracks, and the management of business concessions.
 - **Management of Historic Heritage**, to protect and conserve New Zealand's 300 actively conserved heritage sites.
 - **Conservation with the Community**, to improve public awareness and educational services, and grow conservation through building partnerships with others, including Iwi, councils, community groups, businesses, and individuals.
 - **Statutory Planning and Services to Ministers and Statutory Bodies**, to provide policy advice and other services to Ministers and other parties.
 - **Crown Contribution to Regional Pest Management**, to help control weeds and animal pests on lands administered by DOC to meet statutory obligations.

The value of public conservation land

4. PCL is Crown-owned land managed for conservation purposes. It makes up approximately a third of New Zealand's land area (over 8 million hectares). PCL is primarily administered under the Conservation Act 1987, the National Parks Act 1980, and the Reserves Act 1977. PCL is a highly valuable resource for New Zealand. This value takes many forms:²
 - current use value from environmental services directly used
 - current use value from environmental services indirectly used
 - future use value in retaining the option to use an environmental service

2 New Zealand Institute of Economic Research. (February 2018). *What's the use of non-use values? Revised NZIER report to The Treasury*. <https://www.treasury.govt.nz/sites/default/files/2018-08/LSF-whats-the-use-of-non-use-values.pdf>.

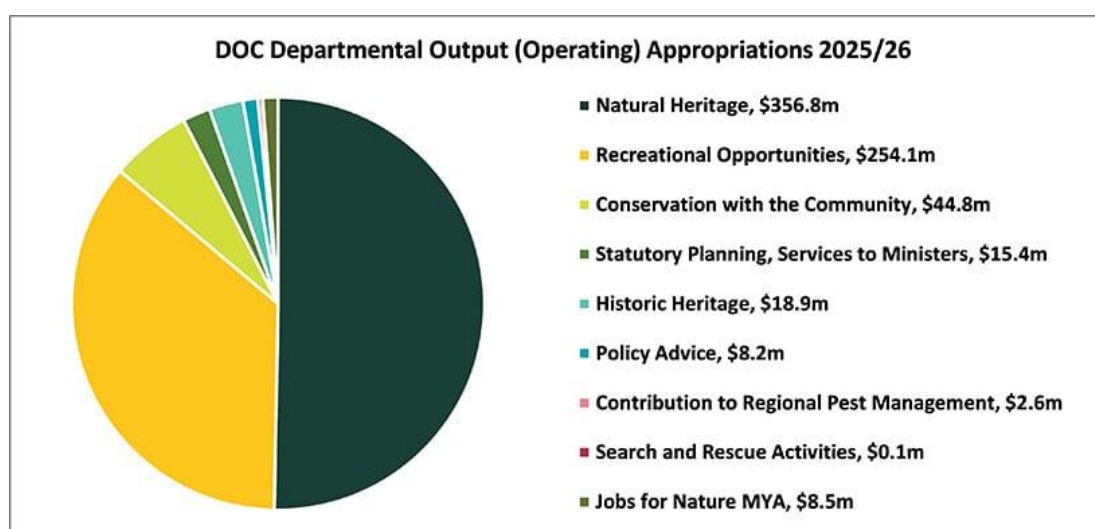
- non-use or passive use value (e.g. people get value from knowing kākāpō exist on offshore islands, even though they may never see one).
5. In 2024 DOC commissioned the New Zealand Institute of Economic Research to report on the total value of PCL. The report estimated the net value of ecosystem services provided by PCL to be around \$11 billion per year. The report also found that the natural and physical capital (assets) on PCL are worth \$134 billion, and that national parks have an intrinsic (non-use) value for New Zealanders of \$12.6 billion. These services underpin significant parts of our economy and contribute to the wellbeing of New Zealanders, for example:
- water provisioning services (water for drinking, agricultural and industrial processes) were valued at \$2.5 billion per year
 - waste treatment services (detoxifying excess nutrients and compounds in the environment) were valued at \$3 billion per year
 - disturbance regulation (an environment's ability to withstand things like storms, floods and drought) were valued at over \$1.7 billion per year
 - recreation activities linked to PCL were valued at almost \$500 million per year. This includes non-market benefits for New Zealanders (health, quality of life, education and research, socialisation) of \$448 million.
6. These figures are likely to be a conservative estimate due to:
- data limitations, for example the lack of New Zealand-specific data means that no economic value was placed on cultural heritage or culturally specific benefits from ecosystems
 - the difficulty of valuing things like health or cognitive benefits
 - the exclusion of the economic flow on effects of commercial activities on PCL (e.g. tourism, mining).

The Department of Conservation's budget

7. DOC's budget for its functions (outlined in paragraph 2) is bound by the Public Finance Act 1989. In 2025/26 DOC has a total operating budget of \$709 million, up from \$664 million in 2024/25. This is largely due to an increase in International Visitor Conservation and Tourism Levy (IVL) contribution allocated to DOC by the Government, which will provide an additional \$55 million.³
8. The Crown, through DOC, undertakes activity and provides services on PCL to improve conservation outcomes and generate wider benefits for society. This increases the value of PCL and wider biodiversity for New Zealand. A breakdown of budgets for DOC's different functions is included in Figure One below.

³ The total new contributions from the IVL allocated to DOC in 2025/26 is \$95 million. However, the Government decreased other Crown contributions to DOC by \$40 million. Factoring in this decrease, the total new additional contribution from the IVL to DOC is \$55 million.

Figure One – DOC Departmental Output (Operating) Appropriations 2025/26⁴



Charges are a small but important contributor to DOC's budget

9. General taxation funded the majority of DOC's budget in 2023/24. This was supported by fees, levies, royalties and payments for goods and services. For 2023/24 this included, but was not limited to:
 - **Facility fees and retail:** \$25.4 million (4 per cent). DOC charges users of facilities (mostly huts and campsites) for the use of those facilities. In addition, DOC gets revenue from selling goods from its visitor centres.
 - **Concession fees:** \$2.4 million from cost-recovery fees (< 1 per cent) and \$26.8 million from activity fees (i.e. royalties) (4 per cent) associated with concessions. Most activities on PCL require regulatory authorisation in the form of a concession. Exceptions to this include non-commercial recreation and mining (regulated separately under the Crown Minerals Act 1991).
 - **International Visitor Conservation and Tourism Levy:** \$35.6 million (5 per cent) for 2023/24 (forecasted to increase to \$95 million annually). A levy paid by just over half of all international visitors to New Zealand (excludes Australians and visitors from some Pacific islands).

DOC's existing charging framework

DOC uses various user charges to fund the conservation system. This includes facility fees, which are paid by individuals to cover the cost, and acknowledge their private benefit, from their use of a facility (e.g. hut, campsite).

Unlike fees elsewhere in the public sector, conservation facility fees are not set based on cost recovery (as defined in Treasury's 2017 *'Guidelines for Setting Charges in the Public Sector'*). Instead, they are set based on what DOC (as the delegate of the Minister of Conservation) considers to be 'reasonable'.⁵

DOC's interpretation of this legislative requirement is outlined in its internal *'Recreation facilities and services pricing policy'*. This interpretation includes ensuring

4 MYA stands for multi-year appropriation.

5 See Conservation Act 1987, s 17(2), s 60D; National Parks Act 1980, s 49(3); Reserves Act 1977, s 59A(2).

DOC considers the following when setting fees:

- its legislative powers (and its limits) to charge
- its role as a government agency with broad conservation, recreational and tourism policy drivers which are set out in its management plans and policies for national parks, conservation areas and reserves
- its monopoly position in the provision of goods and services
- the array of commercial (market) and non-market pricing techniques available
- the role user charges can play in influencing use and demand for facilities
- the views of its partners, stakeholders and visitors.

Visitors potentially exceed carrying capacity at several sites

10. Carrying capacity is the maximum use that an experience can sustain before impacts on people and the environment become unacceptable or unmanageable. Increases in visitation beyond carrying capacity have a negative impact on:
 - **the environment** because of physical damage (e.g. trampling, erosion and damage of geological features), as well as ecological damage (e.g. disruption of wildlife, introduction of pest plant species).
 - **the visitor experience** due to factors such as compromised wilderness values (e.g. solitude, remoteness), social impacts (e.g. crowding, displacement) and environmental impacts.
11. Visitor numbers at some sites are already at risk of exceeding carrying capacity during some times of the year.

Case study – The Tongariro Alpine Crossing

The Tongariro Alpine Crossing (**TAC**) in Tongariro National Park is a 20.2 kilometre walk that takes between six and eight hours to complete. It traverses between the peaks of Tongariro, Ngāuruhoe and Ruapehu in an area of high cultural and spiritual significance for local Māori. In 1992/93 around 10,000 visitors walked the crossing annually. By 2018/19 this peaked at 155,000 visitors.

Surveys undertaken between 2007 and 2024 found that at peak times perceptions of overcrowding and lack of access to clean toilet facilities resulted in negative visitor satisfaction. Separately, in 2017 Iwi raised concerns about the management of the significant amounts of human waste being generated close to their sacred sites.

The large growth in visitor numbers has necessitated several management interventions, such as car parking restrictions and the development of additional facilities. While additional facilities can increase carrying capacity, they can also negatively impact wilderness values and are not always environmentally or culturally appropriate. Additional facilities also create new costs, with funding reprioritised from elsewhere. Current annual operational expenditure on TAC facilities is around \$0.1 million.

Visitors currently contribute through a \$3 community contribution fee applied through concessionaires (e.g. commercial shuttles and guides). This is forecast to generate

\$0.3 million per year by 2027, to fund manaaki rangers, undertake annual wānanga and to provide for facility maintenance as required.

Other prominent examples of PCL exceeding, or at risk of exceeding, carrying capacity include Piopiotahi Milford Sound, Aoraki Mount Cook and Mautohe Cathedral Cove.

How the status quo is expected to develop

DOC's growing financial and environmental pressures:

12. DOC is facing growing challenges with visitor management, infrastructure and biodiversity protection. These are outlined below.

A significant increase in international visitors since 1987

13. When DOC was established with the passing of the Conservation Act in 1987, New Zealand had 844,000 international arrivals. This number has grown by roughly 250 per cent. In 2024, New Zealand had 3.3 million international arrivals, trending towards the 2019 peak of 3.9 million arrivals. Around half of all international tourists will visit a national park during their stay. This puts pressure on facilities, resulting in higher costs for visitor management and maintenance (e.g. emptying toilets).⁶

Increasing impact of severe weather events

14. Climate change is increasing both the frequency and intensity of extreme weather. Because of this, costs associated with extreme weather continue to increase. For example, following the severe storms that hit the North Island in 2023 around 42 per cent of DOC's sites in the affected regions required repair or replacement. As a result, DOC's storm damage costs rose to around \$5 million in 2023 and \$7.1 million in 2024, compared with \$1.2 million on average in the four years before 2023. DOC expects the cost associated with weather events will continue to increase.

DOC's assets are ageing, and the cost of replacements is growing

15. DOC is behind in the renewal and replacement of assets by around \$25 million per year. The cost to replace assets is now far higher than when they were constructed, even when adjusted for inflation. This is due to factors such as technological advancements (e.g. solar panels, double glazing), higher building standards, increased construction costs and stricter safety requirements. Historic underinvestment in DOC's assets means more maintenance and replacements will be needed in future, at a higher cost. Forecasts show that an additional \$320 million of capital expenditure will be required over the next 10 years to replace assets at the end of their financial life. This will also require associated operating expenditure.

Biodiversity is declining, requiring investment to maintain previous gains

16. Experiences with nature is a key part of a visitor's experience on PCL. New Zealand's ecosystems are declining and over 4,300 native species are either at risk or threatened with extinction. This is being driven by invasive species, climate change, land use shifts and pollution. New Zealand is at risk of losing some of its unique species and

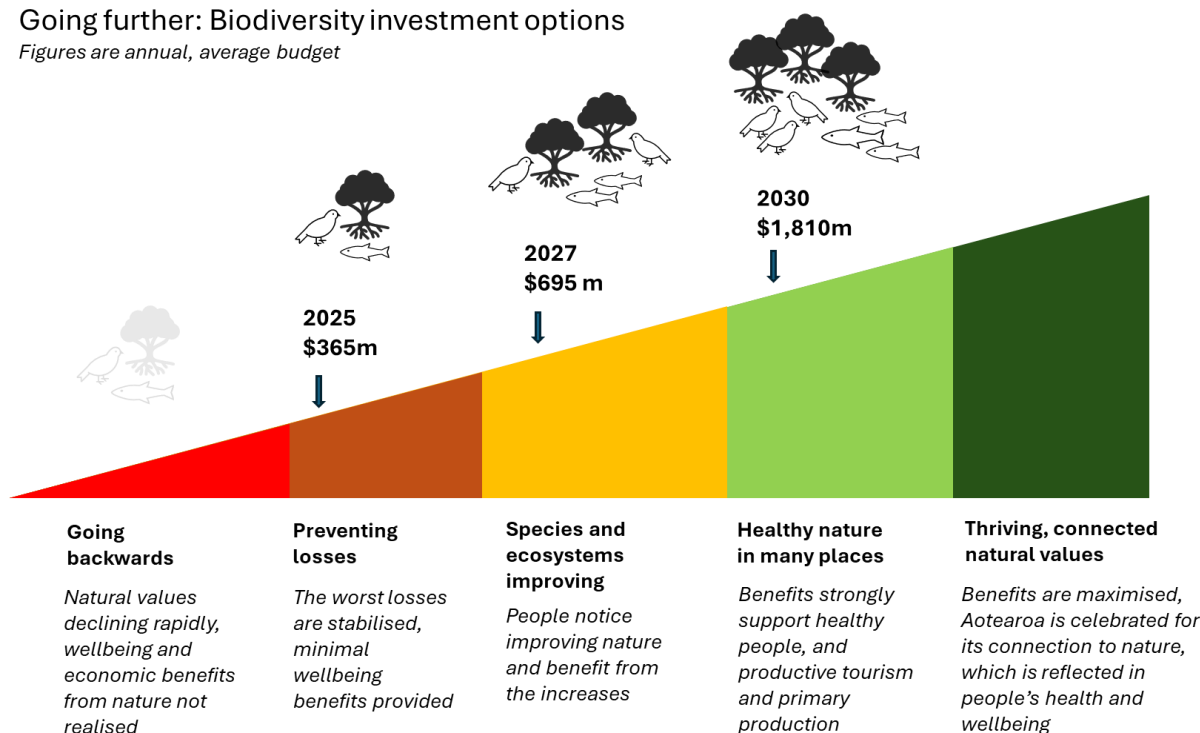
6 For example, high numbers of international day visitors to Mueller Hut in Aoraki Mt Cook National Park in 2023/24 resulted in additional helicopter waste removal trip being required, costing an extra \$18,000 beyond what was budgeted.

ecosystems, significantly degrading the value of visiting PCL and the non-use value of biodiversity. An additional \$67 million of investment into biodiversity would mean active protection of an additional 250 species.⁷ The scale of biodiversity funding needed is represented in Figure Two below.

Figure Two: Annual estimated budget need to improve biodiversity outcomes (DOC, 2025)⁸

Going further: Biodiversity investment options

Figures are annual, average budget



Under the status quo, work is underway to address financial challenges, but it is limited in magnitude

17. The Minister of Conservation has outlined a priority to grow revenue and recalibrate costs.
18. To deliver on this priority, DOC is progressing initiatives from the Government's Revenue Action Plan for Conservation, which aim to grow funding for conservation. Initiatives include:
 - creating new visitor charges under existing legislative powers (e.g. car park charges) and reviewing existing ones
 - creating new charges for commercial activity, reviewing existing charges for concessionaires and improving cost recovery
 - expanding commercial partnerships and donations.
19. DOC also has other workstreams underway that aim to improve the effectiveness and efficiency of DOC's spending. These include:

⁷ This figure is based on species management plans that are currently being reviewed and improved. Plans incorporate modelled costs where we have not yet calculated the detailed, specific cost, and they do not reflect efficiencies where we work on multiple species and ecosystems at the same locations.

⁸ Figures represent different funding scenarios, averaged over a 4-year period.

- **Future Visitor Network** - aims to review what facilities make up DOC's visitor network, to ensure it continues to meet visitor needs and to improve its financial sustainability.
- **Proposals to modernise conservation land management** - aims to make PCL management more effective and efficient through improvements to management planning, concessions, amenities areas and land exchange and disposal.

Defining the policy problem and the opportunity

20. With growing visitor numbers and increasing risks to biodiversity, DOC's current funding is inadequate to manage the upkeep of PCL.
21. The policy problems can be split into two parts:

Funding	DOC's funding is inadequate to meet its statutory obligations over the medium to long term, limiting its ability to deliver and maintain conservation outcomes and wider societal benefits. Inadequate funding limits DOC's ability to undertake core conservation activities, such as pest control, and maintenance of the visitor network. Biodiversity outcomes are declining, and DOC must reduce the size of its visitor network. This has negative impacts for tourism and economic growth. ⁹
Equity	DOC's ability to recover costs from visitors is limited by legislation, which prohibits charging for tracks, paths and access. As a result, there is inequitable charging across user groups, with those using huts and campsites paying fees, while day-walkers or short-term visitors often not contributing. The lack of a financial contribution from these groups results in other paying users, or the Crown, contributing an 'unfair' share of the costs of the facilities they're using.

22. Currently, DOC is largely reliant on the Crown for its baseline funding and any funding increases required to cover cost pressures. However, in the current constrained fiscal environment, additional Crown funding in the short to medium term is unlikely.
23. Due to inadequate funding, DOC is having to reduce its activities (e.g. providing recreational facilities, undertaking biodiversity work). Work is underway to identify lower value visitor experiences that will have future funding deprioritised as DOC looks to divest these to third parties. The scope and scale of biodiversity work delivered by DOC must be reprioritised, potentially leading to loss of prior biodiversity gains made through earlier Crown investment. Even if additional Crown funding becomes available in the future, recouping any losses will take time and cost significantly more.
24. Additional revenue from an access charge could be invested in maintaining and improving existing experiences on PCL. Managed carefully with visitor management tools to avoid unsustainable peaks, this would result in higher utilisation of PCL, leading to wider economic growth and societal benefits (e.g. health).

9 For example, see Department of Conservation. (2024). *Tourism Economy on public conservation land and waters 2024*. <https://www.doc.govt.nz/about-us/our-role/managing-conservation/assessing-the-value-of-public-conservation-land/>.

Lack of legislative flexibility in the charging regime is creating inconsistent and unfair outcomes

25. Although the Conservation Act, National Parks Act, and Reserves Act provide some powers to charge visitors for the use of facilities, these are constrained by provisions prohibiting charges for the use of tracks and paths. The Conservation Act goes further and explicitly guarantees that access to conservation areas will be free to the public.¹⁰ Concessionaires can also be charged a range of fees under Part 3B of the Conservation Act, which are often passed on to their clients. This means that visitors are only charged if they use overnight facilities (e.g. campsites, huts) or use the services of a concessionaire.
26. This lack of legislative flexibility is creating issues as the popularity of the activities visitors undertake on PCL changes. Shorter experiences that do not rely as much on overnight facilities are becoming more popular. This includes short walks, day walks and mountain biking.¹¹ The track standard for these experiences is often significantly greater than that of most overnight tramps, being up to seven times more expensive per kilometre.

Case studies	
<i>Day walkers to Mueller Hut Aoraki / Mount Cook National Park</i>	<i>Mountain bikers on the Heaphy Track Kahurangi National Park</i>
Over three-quarters of summer visitors to Mueller Hut are day walkers. Day walkers are not required to pay to use the hut facilities such as the toilet. An adult visitor staying overnight is required to pay \$50 per night.	About 17 per cent of Heaphy Track users are mountain bikers. Mountain bikers can finish the track in one to two days, paying up to \$44 in hut fees. Trampers take up to five days and pay up to \$220 in hut fees. The track has seen significant upgrades in the past decade, including larger bridges and a wider path to accommodate mountain biking.

International tourism on PCL also raises equity issues

27. Equity issues are also raised by the prevalence of international tourism at some sites on PCL. The majority of the costs of these experiences are funded by the Crown through general taxation. International tourists contribute to costs via the IVL, GST, and where they pay for the use of specific facilities. This still makes up a small proportion of total costs and means, in many cases, New Zealand taxpayers are effectively 'subsidising' the experiences of international visitors on PCL.

¹⁰ See Conservation Act 1987, s 17; National Parks Act, s 49; and Reserves Act 1977, s 59A.

¹¹ When the Conservation Act was passed in 1987 mountain biking was in its infancy, with the first mountain bikes imported to New Zealand in 1984. Since then, it has seen rapid growth with adult participation sitting at 9.2 per cent in 2014. See Sport New Zealand. (2015). *Sport and Active Recreation Profile: Cycling & Mountain Biking – Findings from the 2013/14 Active New Zealand Survey*. <https://sportnz.org.nz/media/1530/2013-14-sports-profile-cycling.pdf>.

What objectives are sought in relation to the policy problem?

28. The primary objectives of this proposal are to:
- provide DOC with the tools to charge visitors in a more equitable way, so visitors contribute towards the experiences they enjoy the benefit from
 - improve visitor experiences on PCL, funded from increased visitor revenue.
29. The secondary policy objectives are to:
- uphold the Crown’s obligations under the Treaty of Waitangi
 - ensure that the benefits of recreation and tourism on PCL, such as economic, health, wellbeing, and cultural benefits, are maintained and improved over time.

What consultation has been undertaken?

30. In October 2024, Cabinet agreed to consult on the discussion document *Exploring charging for access to some public conservation land*.
31. Consultation took place from November 2024 to February 2025, alongside proposals to modernise conservation land management.
32. DOC held 25 regional hui with iwi, as well as four stakeholder engagements and four public information sessions during the consultation period.
33. In total, 7,412 submissions were received on the proposal. A breakdown of the submissions received is below. These numbers do not include submissions that were excluded because they were duplicated or blank.

Table One: Summary of submissions received

Type of submissions	Number of submissions	Proportion of total submissions
Forest & Bird form submission	4,836 (1,305 had additional comments)	65 %
Online survey submission	2,339	32 %
‘Unique’ submission	237	3 %
Total submissions	7,412	-

34. The statistics on submissions cited in this RIS come from unique and online survey submissions only. Forest & Bird form submissions did not respond to the specific consultation questions, so could not be used in the statistics. These submissions were included in the overall qualitative thematic analyses of submitters’ views.¹²
35. Not every submitter responded to all consultation questions. The statistics used in this RIS represent the views of those that did respond to the relevant question. Blank answers were not counted in the statistics.

¹² Within the Forest & Bird pro forma submission the key points relevant to this RIS were: “charges should only be used as part of an overall government plan to deliver a net, sustained increase in investment in biodiversity and conservation” and “any charge for access to public conservation land should not deter New Zealanders from connecting with the natural environment of Aotearoa”.

36. Of the online survey and ‘unique’ submissions, roughly 93 per cent came from individuals. The remaining seven per cent was comprised of 28 conservation groups, 6 industry associations, 44 Iwi, Hapū or Māori organisations, 6 local government groups, 39 not-for-profits or clubs, 41 tourism stakeholders and 5 ‘other’.
37. Submissions from individuals and groups have been weighed equally in the statistics below. Note that ‘unique’ submissions were primarily from groups, organisations and businesses.
38. When submitters were asked how they felt about the Government charging for access to some areas of PCL, they gave the following responses:
- Overall, around 63 per cent of submitters opposed charging for access to some areas of PCL.
 - Around 64 per cent of online survey submitters opposed or strongly opposed the Government introducing the ability to charge for access to some parts of PCL, whereas 27 per cent supported or strongly supported the Government doing so.
 - Around 51 per cent of ‘unique’ submitters supported or strongly supported the Government introducing the ability to charge for access to some parts of PCL, whereas 42 per cent opposed or strongly opposed the Government doing so.
39. When asked to what extent they supported charging New Zealanders and/or international visitors, submitters showed strong opposition to charging New Zealanders and the majority supported charging international visitors.¹³ This is summarised in Table Two.

Table Two: Submitters’ views on who should pay access charges¹⁴

<i>Expressed as percentages</i>	Submission type	Oppose, or Strongly Oppose	Neutral	Support, or Strongly Support	Unsure
Charging everyone	<i>online survey</i>	86	5	9	1
	<i>‘unique’</i>	82	2	13	2
Charging everyone, but New Zealanders pay less	<i>online survey</i>	77	6	16	1
	<i>‘unique’</i>	63	5	29	3
Charging only international visitors	<i>online survey</i>	16	12	71	1
	<i>‘unique’</i>	14	8	76	3

13 Some submissions are unclear about whether the submitter opposes *any* access charge and only supports charging international visitors if there was no other option. Conversely, some submitters clearly oppose access charges generally but still support charging international visitors.

14 Percentages are rounded to the nearest whole number. Percentages may not sum due to rounding.

Many Iwi and Hapū supported charging international visitors, but not New Zealanders

40. Views from Iwi, Hapū and Māori organisations varied. Some select key themes are below:
- most expressed conditional support for charging international visitors, depending on how government works with Iwi and Hapū to protect their rights and interests, and the role for Iwi and Hapū in the design and implementation of any access charge
 - most opposed charging everyone, and/or charging everyone, but with New Zealanders paying less
 - strong opposition to charging mana whenua to access PCL within their rohe.

Most stakeholders opposed charging New Zealanders, but some supported charging international visitors

41. Stakeholder views varied, even amongst stakeholders with similar interests. Key themes from stakeholder submissions are below:
- **Recreation, hunting and fishing stakeholders:** broad support for charging international visitors, while most are opposed charging New Zealanders due to concerns about creating a price barrier, equity issues, impacting New Zealanders' ability to hunt, and the perception that free access to PCL is a right for New Zealanders that should not be changed.
 - **Tourism stakeholders:** support charging international visitors, with mixed views about whether New Zealanders should be charged. Some groups are concerned about double charging with concession fees, and/or the IVL.
 - **Conservation boards and environmental groups:** support for charging international visitors, with opposition to charging New Zealanders. Support for charging was largely based on the potential to increase funding for conservation work.
42. A detailed summary of submissions will be released in mid-2025.

Section 2: Options to address the policy problem

Criteria to compare options to the status quo

43. Options for change have been compared to the status quo using the following criteria:

Criteria	Description
Technical criteria	
Net revenue for conservation	Ability to generate sufficient revenue to invest into improving visitor experiences on PCL.
Cost to establish, collect and administer	Estimated cost to establish, collect and administer.
Values-based criteria	
Equity	Making sure the costs of visitor services and facilities are shared equitably between users, and between users and the Crown. This includes considering how much visitors can and are willing to pay.
Treaty of Waitangi	Supporting and upholding the Crown's Tiriti o Waitangi / Treaty of Waitangi obligations, including Treaty settlement commitments.
Supports recreation	Supporting the accessibility of PCL for recreation by New Zealanders.

44. There are potential trade-offs between revenue generation and some of the values-based criteria. Higher revenue options could create price barriers and affect the ability of Māori to maintain kaitiaki relationships on PCL. The weighting of values-based criteria in decision making is highly subjective and will be determined by the values of the decision makers.
45. This RIS assumes that the imposition of a levy will likely decrease the number of visitors to these sites on PCL in the short and medium-term (depending on willingness-to-pay). However, in the long-term visitor numbers will likely increase due to visitors being attracted to higher quality experiences, more accessible facilities and visitors becoming accustomed to paying. If this is the case, there may be associated spillover benefits outside of PCL, such as for regional employment and tourism. Visitors may also redistribute to other experiences on PCL where a levy is not imposed. The impact on visitor numbers, and the desirability of this impact, will be analysed in more detail in site-specific RIS(s) to support regulations development.

Efficiency of implementation is being considered in more detail in site-specific analysis

46. As with any user charge, ensuring that the cost of collection does not exceed the revenue generated is essential and that an unreasonable amount of cost is not imposed on visitors due to inefficient payment systems. User charges should be efficient and deliver a relatively high return-on-investment.
47. Implementation efficiency, return-on-investment and costs will be more fully considered as site-specific levies are progressed, including as part of a subsequent business case and a RIS(s).

Why is a user charge being considered?

Some experiences on PCL are ‘club goods’

48. The Treasury defines public goods as a good with the trait ‘that excluding people from its benefits is either difficult or costly, and its use by one person does not detract from its use by another’.
49. While in many cases experiences on PCL exhibit these traits, there are notable exceptions. In places where the geography allows, non-payers can theoretically be prevented from accessing that experience (e.g. Milford Corridor, Aoraki Mount Cook). Additionally, in areas facing issues with carrying capacity the use by one visitor potentially reduces the enjoyment that others get from the same experience (e.g. Tongariro Alpine Crossing).
50. The situations where charging is being considered more closely resemble club goods – ‘people can be excluded from its benefits at a low cost but its use by one person does not detract from its use by another, at least until the point where congestion occurs’.
51. Regardless of option chosen, where congestion occurs (i.e. ‘rivalry’), DOC will consider the use of its visitor management powers to address this (e.g. booking systems), to improve visitor experience and protect the environment.

Context – Fees, levies and taxes		
Fees	Levies	Taxes
A fee is a charge on a <u>specific person</u> for the provision by the government of a good or service. Fees are targeted, location-based, and reflect the private benefits that individuals receive from a service. They are often used in situations where costs to provide a service are clear, or easy to attribute to users. Commonly used for private or mixed goods.	A levy is a charge on a <u>group of individuals or organisations</u> who benefit from a good, service, or regulation to help fund a particular government objective or function, such as conservation outcomes. They are often used in situations where it is difficult to attribute costs to individual users. Commonly used for club goods.	A tax is a charge imposed by the government on individuals or organisations to fund general public expenditure. Only Parliament has the power to authorise the raising of money through taxes.

What sort of user charge is most appropriate? A fee, levy or tax?

52. A common way of charging for the use of a club good is to apply a levy to users. A levy is considered the preferred approach in this RIS (see Option 4A and 4B), as there is an identifiable group to which the benefits of access accrue – visitors (direct users of PCL). A levy would provide the additional advantage that revenue would be earmarked for the maintenance of PCL and enhancement of visitor experiences, distinguishing it from a tax.¹⁵
53. Funding all of DOC's activities through a levy on visitors is not recommended or viable. PCL and biodiversity provide benefits for society wider than direct users, including the non-use value of biodiversity.
54. This RIS also considers the expansion of existing visitor facility fees (see Option 3).

Discounted types of charges

55. The use of a cost-recovery fee has been discounted because:
- it would be difficult to directly allocate the costs of providing an experience to individual visitors because experiences consist of a package of facilities (e.g. tracks, toilets, shelters) with fixed and variable elements
 - investment is required to improve experiences, and this may be seen as cross-subsidisation across time.
56. While there are some similarities between levies and taxes, the targeted nature and direct link between usage and funding made a levy preferable in this context. The use of a conservation-specific tax was also discounted because:
- it could be found to be contrary to New Zealand's international tax agreements if discriminatory rates were used for international visitors (one of the options the Minister of Conservation has indicated he would like investigated for any regulations)¹⁶
 - it would also not improve conservation outcomes, as revenue would not be ring-fenced for conservation purposes.

The difference between an access levy and a border levy (i.e. the IVL)

57. As previously discussed, international visitors to New Zealand, except for Australians and visitors from some Pacific Islands, are required to pay the IVL. This is required before arrival under section 399A of the Immigration Act 2009.
58. The IVL was introduced in 2019 to address issues with funding infrastructure related to tourism and conservation. The 2018 RIS completed for the IVL identified that the Government at the time considered that a package of funding tools was required to ensure that tourism infrastructure and conservation move to a more sustainable funding package.¹⁷ The RIS also included analysis on the potential need to develop new local visitor levies and user charges for PCL. Around half of submitters to the IVL's public

15 Legislation Design and Advisory Committee. (2021). *Legislation Guidelines: 2021 Edition*. Pages 89 – 90.

16 For example, see *United States - New Zealand Income Tax Convention*, Article 23. Also see *Addy v Commissioner of Taxation* [2021] HCA 31 (Australia).

17 Ministry of Business, Innovation and Employment. (2018). *Regulatory Impact Statement: International Visitor Conservation and Tourism Levy*.

consultation suggested that the IVL should be introduced alongside complementary revenue tools (including local visitor levy, user charges).¹⁸

59. The IVL's RIS makes it clear that it was always intended to be part of a package of funding tools for tourism infrastructure and conservation. There are several differentiating factors between any access levy and the IVL, these are outlined in Table Three. An access levy has additional benefits in that it is targeted to direct use and therefore more equitable.

Table Three: Differences between the IVL and an access levy to PCL

	IVL (broad)	Access levy (targeted)
Purpose	To provide ring-fenced funding towards conservation, tourism infrastructure and tourism initiatives across New Zealand.	To provide ring-fenced funding towards visitor experiences on PCL where charged (e.g. key visitor destinations on PCL). This includes the upkeep and improvement of visitor facilities and biodiversity work that contribute towards the visitor experience.
Who can access levy funds	Ministry of Business, Innovation and Employment, DOC.	DOC.
Who pays	International visitors, excluding Australians and visitors from some Pacific Islands (who make up around 50% of all visitors).	All international visitors, and potentially New Zealanders (see Option 4A and Option 4B).
Where it is paid	Before entry to New Zealand.	On (or before) access to key visitor destinations on PCL. Could also be collected as part of a 'national parks pass' or similar product.

Scope and limitations of the options considered by this RIS

60. To identify gaps in the funding 'tools' available, DOC considered how similar overseas government agencies charge visitors. Access charges are commonly used internationally and are viewed as a significant opportunity to improve funding available for PCL and improve the equity of visitor charges. Based on this advice, Cabinet directed DOC to publicly consult on the use of access charges to inform a full regulatory impact statement (**RIS**) and final policy decisions.
61. While access charges may be used to cover some of the cost of facilities which the Minister of Conservation can currently charge for, a full review of existing facility charging powers has not been considered due to resourcing and timing constraints. Integration with the existing facility charging powers will be considered when regulations are proposed.
62. Simply removing the prohibition on charging for the use of tracks and paths was considered but ultimately discounted, as it would not provide sufficient legal clarity and could be perceived as a proxy access charge.

¹⁸ Ibid. Page 9.

63. The Government has put an increase to the IVL out of scope of this RIS because they recently increased the IVL in October 2024. The Government has also put legislative changes to apply the IVL to Australians out of scope for the same reason.

This RIS assumes revenue from options will be additional to Crown funding

64. The analysis of options in this RIS, including the cost benefit analysis, assume that any revenue created by the options will be additional to existing Crown funding and spent on DOC's activities.
65. If a future Government decides to reduce Crown funding because of additional revenue from visitors, the benefits resulting from increased spending on conservation and visitor facilities will be reduced or eliminated. In that case, the effect of the policy would be to shift some of the cost of conservation work and providing visitor experiences from the Crown (i.e. the taxpayer) to visitors accessing PCL.
66. There could be two consequences:
- a) **reduced economic efficiency** – the imposition of charges on visitors introduces transaction and administrative costs, and potentially discourages potential visitors. If revenue is not spent to create additional value either in conservation or elsewhere, there would be reduced benefits for society.¹⁹
 - b) **improved equity** – the shifting of more costs to visitors, where costs are disproportionately worn by the Crown, acknowledges that they impose costs and receive private benefits. This will remain true if existing Crown funding is reduced. See the 'equity' criteria for further discussion.

Options analysed in this RIS

Option 1 – Status Quo

67. The current balance of Crown and user funding within Vote Conservation is maintained, with work continuing to implement the Government's Revenue Action Plan for Conservation, as discussed in *Section 1*. Charging for access to PCL continues to be restricted.

Option 2 – Voluntary payments (non-regulatory)

68. Visitors are encouraged to make a voluntary contribution at the trailhead or when booking. Charging for access to PCL continues to be restricted.
69. Most survey submitters supported the use of voluntary payments, but many also thought that voluntary payments alone would not be effective, as people could simply choose not to pay.
70. Alongside this, use of already available visitor management tools (non-regulatory and regulatory) would be investigated to address issues with visitor management and ensure a quality visitor experience.

19 For more information see: Senate Environment, Recreation, Communications and The Arts References Committee. (1998). *Access to Heritage: user charges in museums, art galleries and national parks*. Page 52. https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Completed_inquiries/1996-99/access/report/c04.

Option 3 – Increase and expand existing facility charging powers (non-regulatory)

71. Expand the use of existing facility charging powers and increase prices significantly where charges are already in place (e.g. huts and campsites). This could include a step-change in the planned carpark charging pilot to cover many sites around New Zealand. Charging for access to PCL continues to be restricted.
72. Some submitters raised wider use of carpark charges and better charging at busy campsites as an alternative to access charging, to generate revenue for conservation.
73. Alongside this, use of already available visitor management tools (non-regulatory and regulatory) would be investigated to address issues with visitor management and ensure a quality visitor experience.

Option 4A – Introduce a new levy power to charge for access (regulatory)

74. The Conservation Act, National Parks Act and Reserves Act are amended to introduce a levy making power for visitor access.

Purpose of the levy

75. The purpose of this levy would be to fund the maintenance and enhancement of visitor experiences on conservation land controlled or managed by the Crown. This would enable the Government to fund a step change in how visitor infrastructure and services are provided, as well as conservation work that contributes to international visitors' overall experiences (e.g. activities to improve the opportunities for wildlife encounters).

Prioritisation of levy revenue

76. The reinvestment of levy revenue would be prioritised in the locations where it was generated, to maintain social license for the levy and to ensure experiences are appropriately maintained to the expected standard. Once investment needs at-place are met, the levy revenue could be reinvested into the region or in priority national projects to improve visitor experiences.

Visitor management

77. In future, price could also be used as a demand management tool if desired. This would sit alongside existing visitor management tools (non-regulatory and regulatory). As part of site specific analysis the use of all these visitor management tools would be investigated to ensure a quality visitor experience.

Opportunities for bundling of charges

78. Introduction of a levy and removal of the prohibitions would enable new opportunities to bundle existing and new visitor charges. This could include a single pass for entry into an area that cover things such as access, car parking and visitor impact fees (charged to some concessionaires).²⁰

20 A practical example of a different charging model is that used on the Old Ghost Road. For the Old Ghost Road the Mōkihinui-Lyell Backcountry Trust charges a flat \$160 for all users, irrespective if they walk or bike, or how many days they complete the track in. This covers the use of all facilities along the track.

Differential pricing, exemptions and discounts

79. Differential pricing, exemptions and discounts would be enabled in regulations. Feedback on the public consultation indicated the design of differential pricing, exemptions and discounts would heavily influence the social license of any access charge.

Levy site selection

80. Criteria for levy site selection would need to focus on providing certainty and assurance for the public on the type of locations where charges could be used, while providing a degree of flexibility for their use in the future as visitors behaviours and cost drivers change. Sites are proposed to have to meet at least one of the following for a levy to be applied:
- a) sites that are iconic and popular, with high international visitor numbers, AND / OR
 - b) sites that have high visitor infrastructure and facility costs, AND
 - c) where the benefits of introducing an access levy exceed operational costs.
81. Sites that meet these criteria include Aoraki / Mt Cook, Piopiotahi / Milford Sound, Mautohe / Cathedral Cove and the Tongariro Alpine Crossing. There are 2.5 million visitors across the four sites annually.

Option 4B – Introduce a new levy power to charge only international visitors for access (regulatory)

82. Same as Option 4A, but the levy would apply only to international visitors, with New Zealand citizens and individuals ordinarily resident in New Zealand (“New Zealanders”) not subject to the charges. This distinction would be clearly established in primary legislation. For someone to be ordinarily resident in New Zealand they need to have lived in New Zealand for six-months or more.
83. This option could be combined with a variation of voluntary payments (Option 2) for New Zealand citizens and individuals ordinarily resident.

How do the options compare to the status quo?

	Option 1 – Status Quo	Option 2 – Voluntary payments	Option 3 – Expanded and increased facility charges	Option 4A – Visitor access levy, all visitors (DOC preferred)	Option 4B – Visitor access levy, international visitors only (Minister preferred)
Revenue for conservation	0	+	+	+++	++
		Some opportunities for visitors to contribute towards improving visitor experiences at a small scale. However, many visitors may choose not to pay, reducing potential revenue. Reasonably low cost to collect.	Some revenue potential compared to the status quo. Some existing charges may already be at their highest possible limit.	High gross revenue potential compared to the status quo (\$36–90 million). When estimated costs are taken into account, 9 (2) (i) Enables charging for popular tracks and destinations on PCL (e.g. Milford Corridor, Aoraki Mount Cook). Levy revenue will enable greater funding being made available to enhance and expand visitor facilities, tracks and the recreational experience, resulting in an improved visitor/tourism experience. The levy can be used to support biodiversity activities adjacent to popular visitor areas, generating gains for both conservation and tourism outcomes.	Gross revenue \$2–7 million lower than Option 4A (\$34–83 million). 9 (2) (i)

	Option 1 – Status Quo	Option 2 – Voluntary payments	Option 3 – Expanded and increased facility charges	Option 4A – Visitor access levy, all visitors (DOC preferred)	Option 4B – Visitor access levy, international visitors only (Minister preferred)
Cost to establish and collect	0	0 Some minor costs to turn on web functionality for donations and the purchasing of EFTPOS machines. Collected using existing staff.	0 Expansion of existing booking system, negligible additional costs.	- 9 (2) (i)	- 9 (2) (i)
Equity	0	+ Contributions would be voluntary. Would enable the level of donations to align with visitors' ability to pay and the value they derive from the experience (potentially generating larger donations from overseas visitors).	+ Carpark charging may enable the balancing of contributions between users and the Crown. However, increasing existing facility charges may further entrench existing inequities between users.	++ International visitors will pay more than New Zealand visitors, and regulations will enable different groups to be either exempt from the levy payment or pay a reduced charge (e.g. children/young people, disabled people, locals living in the area, hunters and volunteers). Creates a more targeted, 'user pays' approach with people in high-visitor areas contributing more to the quality and quantity of facilities and visitor experience at place (freeing-up Crown funding to contribute to conservation outcomes in areas with no or low visitor numbers and therefore no access levy).	+ Less equitable than Option 4A, as New Zealanders with ability to pay for the services they use will make a windfall gain (i.e. benefiting from something they were able and willing to pay for but received for free).

	Option 1 – Status Quo	Option 2 – Voluntary payments	Option 3 – Expanded and increased facility charges	Option 4A – Visitor access levy, all visitors (DOC preferred)	Option 4B – Visitor access levy, international visitors only (Minister preferred)
Treaty of Waitangi	0	0 Contributions would be voluntary, so this does not impact Treaty obligations.	0 Continuation of the status quo, where all users of facilities are charged for their use. Low risk of unintentionally capturing users undertaking traditional cultural activities.	- 9 (2) (g) (i) Risk that some Iwi members may not be able to access sites that are culturally important due to price or administrative barriers. This risk could be partially mitigated through future policy decisions on the settings in the regulations. These could include discounts, exemptions, or a role in levy revenue allocation.	0 Marginal impact on members of Iwi and Hapū who are not New Zealand citizens or are not ordinarily resident in New Zealand.
Supports recreation	0	0 Visitor access for recreation would not be impacted.	- Increased fees may impact on accessibility by deterring lower-income groups and reducing inclusivity. Differential pricing, discounts and exemptions could help mitigate this impact.	- Levy may impact on accessibility by deterring lower-income groups and reducing inclusivity. Differential pricing, discounts and exemptions could help mitigate this impact.	0 Accessibility for New Zealanders is maintained on the same terms as under the status quo.

Key: Compared to the status quo

+++ significantly better

++ much better

+ better

0 about the same

- worse

-- much worse

Overall assessment of which option is likely to best address the problem

The Minister's preferred option in the Cabinet paper is not the same as the DOC's preferred option

84. DOC prefers to enable charging for all visitors in primary legislation (Option 4A), whereas the Minister prefers to only charge international visitors (Option 4B).

Option 4A is DOC's preferred option

85. While Option 4A and Option 4B scored equally against RIS criteria, DOC considers that Option 4A best balances the policy objectives and delivers the highest net benefits.
86. It scored highest out of all the options for net revenue for conservation (+ + +). It also scored highly for equity (+ +), as it enables a levy that fully recognises the costs imposed and benefits received by visitors.
87. Option 4A has a potential negative impact on supporting recreation (-) and the Crown's obligations under the Treaty of Waitangi (-). It also scored negatively for the cost to collect (-), but this is offset by the strong estimated net revenue (see Table Eight and Figure Three).
88. DOC considers these potential negative impacts of 4A (such as the Treaty and recreation impacts) can be mitigated or eliminated using regulations to provide exemptions, discounts and differential pricing. Because of this, DOC prefers Option 4A over Option 4B.

Option 4B is preferred by the Minister and also scored highly

89. The Minister's preferred option, Option 4B, also scored positively against the criteria. It scored relatively well for supporting recreation (0) and the Crown's obligations under the Treaty of Waitangi (0), as these would remain the same as the status quo.
90. It also scored positively for revenue generation for conservation (+ +). There would be a small but material decrease in estimated revenue (\$2-7 million lower than Option 4A). The access levy scored negatively for the cost to collect (-), but this is offset by the strong estimated revenue (see Table Eight and Figure Three).
91. It scored relatively lower for equity (+) than Option 4A, as only international visitors would directly contribute through the levy towards the experiences they have on PCL.

Commentary on the assessment of options

Treaty of Waitangi / Tiriti o Waitangi implications

92. Section 4 of the Conservation Act states:
- "This Act shall so be interpreted and administered as to give effect to the principles of the Treaty of Waitangi."*
93. **9 (2) (g) (i)**
However, the connection between access to land and cultural identity was a strong

theme heard during the Government's engagement with Iwi (and Hapū) on access charging.

94. As part of the consultation process, many Iwi (and Hapū) representatives expressed that it would be inappropriate to charge members of Iwi (and Hapū) to access PCL within their rohe, as this would interfere with their cultural identity, negatively impact their kaitiaki relationships with their taonga and be seen as a further alienation of their whenua.
95. The Waitangi Tribunal's report WAI 262 *Ko Aotearoa Tēnei* found that Article 2 of the reo Māori text of the Treaty guaranteed kaitiaki would have tino rangatiratanga over their taonga. The Tribunal found that because of this, the relationship between kaitiaki and taonga (such as native wildlife) is entitled to a reasonable degree of protection by the Crown.²¹
96. 9 (2) (g) (i) [REDACTED]
97. At a minimum, exemptions should be provided where they relate to specific rights granted through Treaty settlement.
98. Any exemption specifically for tangata whenua would likely be difficult to implement, likely requiring either self-identification by individuals or involvement of Iwi in the administration of exemptions (perhaps similar to delegations for customary fishing authorisations).²² 9 (2) (g) (i) [REDACTED]

Assessing monetary and non-monetary benefits of access for visitors

99. Many monetary and non-monetary benefits flow from recreation and tourism on PCL, including to the economy, health, wellbeing and culture. For example, prior to COVID-19, conservation-related tourism was worth \$4.3 billion per year, and a more recent estimate has put it at \$3.4 billion per year.²³
100. Non-monetary benefits from access to PCL, such as benefits to health, wellbeing, culture and national identity are harder to quantify. Because of this, it was difficult to determine the cost of the options in terms of lost benefits. The existence of these benefits is well documented.²⁴ Different decision-makers may place different values on non-monetary

21 Waitangi Tribunal. (2011). *Ko Aotearoa Tēnei: A report into claims concerning New Zealand law and policy affecting Māori culture and identity* (WAI 262). Page 703.

22 For example, see Fisheries (South Island Customary Fishing) Regulations 1999, regulation 11.

23 This was an indicative internal estimate of the economic value of tourism activities on public conservation land aggregated from the regions. Estimates were calculated using Ministry of Business, Innovation and Employment databases, which have been discontinued. The updated figure takes into account the period between 2020 and 2023 when international visitor numbers were much lower.

24 For example, see:
IPSOS. (2020). *Survey of New Zealanders 2020*. <https://www.doc.govt.nz/globalassets/documents/about-doc/role/visitor-research/survey-of-new-zealanders-2020.pdf>.
Senate Environment, Recreation, Communications and The Arts References Committee. (1998). Page 44. https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Completed_inquiries/1996-99/access/report/c04.

benefits. In turn this may impact their assessment of the appropriate balance between the costs and benefits of each option.

101. Despite this inherent subjectivity, this RIS still provides some breakdown of these non-monetary costs so they can be factored into the cost-benefit analysis. To assess non-monetary costs, it was assumed that the levy would decrease the total number of visitors and therefore reduce the benefits created.²⁵ Given that assumption:
- Option 2 had no impact on non-monetary benefits as payments are voluntary
 - Option 3 had a moderate negative impact on non-monetary benefits, due to its limited scope
 - Option 4A had the highest negative impact on non-monetary benefits, although this could be mitigated through differential pricing, exemptions and discounts
 - Option 4B had low negative impact on non-monetary benefits, because access by New Zealanders remains free.

Non-monetary value for non-users

102. Although feedback on the consultation from non-users was low, two impacts can be anticipated on the non-monetary value derived from PCL by non-users. These are:
- lower regional spending from lower visitation (assuming visitors do not choose a substitute experience in the same region)
 - potentially lower existence value for non-users that value people visiting PCL, but higher existence value for non-users that value the biodiversity gains funded by levy revenue.
103. It is worth noting that inaction may also result in non-monetary costs, such as the degradation of non-use values (e.g. biodiversity) through insufficient funding (for facilities and pest control) or visitor pressure.

Balancing the benefits from revenue with the cost to access

104. Potential monetary and non-monetary costs need to be weighed against the potential benefits that could be created through the revenue generated. These could include higher visitor enjoyment due to improved facilities and biodiversity gains from pest-control programmes. As explained above, this balancing exercise is difficult because potential revenue is easier to quantify than the non-monetary cost, and is inherently subjective.
105. The assumptions outlined in this RIS has led DOC to conclude, on balance, that Option 4A should be the preferred option. However, it is worth reiterating that decision-makers may place more emphasis on non-monetary benefits from access to PCL and on Treaty considerations, which may then lead them to a different conclusion.
106. Monetary benefits and costs are discussed in the next section.

25 This will depend on visitor willingness to pay. In the long-term visitor numbers may increase due to visitors being attracted to higher quality experiences, more accessible facilities and visitors becoming accustomed to paying. Visitors may also redistribute to other experiences on PCL where a levy is not imposed. The impact on visitor numbers will be analysed in more detail when regulations are developed.

Other design features to achieve objectives

Eligibility for differential pricing, discounts and exemptions

107. If differential pricing (potential under Option 4A) or exemptions (Option 4B) are offered to New Zealand citizens and those ordinarily resident, this will need some level of verification. DOC currently requires visitors wanting to access lower differential prices to show a piece of documentation listed in Table Four below. The presence or absence of the listed documents alone won't be determinative. Each case will be judged based on the evidence provided.

Table Four: Acceptable eligibility proof for the New Zealand rate (Great Walks)²⁶

Eligibility	Copies of one of the following
New Zealand citizen	• New Zealand driver's licence • Birth certificate • New Zealand passport
New Zealand ordinary resident	• New Zealand driver's licence OR name and address on letter from: • an employer or employment records • a New Zealand bank • government agency, i.e. Inland Revenue Department, Ministry of Social Development • local council – rates/water bill • mortgage/tenancy documents agreements • a utility company invoice with your name and address on it • 'official' correspondence addressed to you at your New Zealand address • documents showing that your household effects have been moved to New Zealand.

108. Proof of the documentation above could be requested during spot checks, or by requiring eligible visitors to register for access even if no cost is associated (i.e. they are exempted from levy payment).

Regulation making powers

109. Amendment to existing primary legislation is required to introduce a new access levy. However, most of the levy details would be in regulations. These regulations would be accompanied by a further RIS and a stage 2 CRIS where relevant.
110. Examples of necessary regulations include specifying the location for each charge, the specific amount of the charge, and any exemptions, discounts, differential pricing, and criteria for waivers.

26

See DOC's website for more information: <https://www.doc.govt.nz/about-us/our-role/managing-conservation/recreation-management/great-walks-management/eligibility/>.

Compliance

111. As part of any option, a graduated compliance approach is proposed, following the VADE model:

- **Voluntary behaviour** - encourage compliance through clear information, education, and engagement, making it easy for visitors to comply
- **Assisted behaviour** - when voluntary compliance is not sufficient, assistance is provided, such as information, guidance, and support to help visitors understand and meet their obligations
- **Directed behaviour** - if assisted compliance fails, DOC may direct specific actions or changes to be made by the visitor to achieve compliance
- **Enforced behaviour** - the final stage involves enforcement actions, which may penalties, or even legal proceedings, when a visitor is unwilling to comply with the previous steps.

112. The VADE model emphasises a proactive and tailored approach to compliance, recognising that most visitors are likely to be willing to comply and that enforcement actions are a last resort. It allows for a graduated response, moving from education and assistance to more serious measures as needed and that that compliance interventions are proportionate to the level of non-compliance.

113. As part of implementing a VADE model, regulations would need to specify relevant infringement offences to enable the enforcement of payment should the earlier interventions be insufficient to change behaviour.

High-level estimates of levy revenue and costs

114. This RIS assumes that if Option 4A or Option 4B are progressed then an access levy will likely be implemented first at the locations in Table Five.

*Table Five: Likely initial access levy locations and annual visitor numbers**

Likely levy location		New Zealand visitors (000)	International visitors (000)	Total visitors (m)
Larger	Piopiotahi Milford Sound	110	990	1.1
	Aoraki Mount Cook	120	880	1.0
Smaller	Mautohe Cathedral Cove	63	188	0.3
	Tongariro Alpine Crossing	20	80	0.1
Total				2.5

**Based on 2020 – 2025 visitor numbers*

Indicative levy amount and estimated levy revenue

115. No decisions have been made on levy amounts. However, existing willingness-to-pay data like that collected by the Milford Opportunities Project and international examples provide a guide for the potential range of the levy.²⁷ International examples of national park entry fees include: China (\$58), Nepal (\$46), Argentina (\$45), USA (\$23) and Australia (\$10).²⁸
116. Table Six outlines the range of levy amounts used to provide an annual gross revenue estimate. These were then adjusted by ± 50 per cent to provide a range for the revenue estimates in Table Seven. A two-times differential price has been assumed for international visitors.

Table Six: Levy amounts for sensitivity analysis

	New Zealand citizens and people ordinarily resident			International visitors		
Levy amount range	50%	Base	150%	50%	Base	150%
Larger experience (e.g. Milford, Aoraki)	\$10	\$20	\$30	\$20	\$40	\$60
Smaller experience (e.g. Cathedral Cove, Tongariro Alpine Crossing)	\$5	\$10	\$15	\$10	\$20	\$30

Table Seven: Gross annual levy revenue estimates and sensitivity analysis (levy amount)

	Option 4A (DOC preferred)			Option 4B (Minister preferred)		
Levy amount range	50%	Base	150%	50%	Base	150%
Estimated gross annual revenue	\$36m	\$67m	\$90m	\$34m	\$62m	\$83m
Visitor numbers	2.4m	2.3m	2.0m	2.4m	2.3m	2.0m

27 See Kantar. (2021). *Milford Opportunities Project masterplan: International consumer insights*. <https://www.milfordopportunities.nz/assets/Milford-Opportunities-Project-Masterplan-International-Consumer-1.pdf>.

28 Adjusted for inflation and converted to NZD from USD. See Van Zyl, H., Kinghorn, J., & Emerton, L. (2019). National park entrance fees: A global benchmarking focused on affordability. *PARKS*, 25(1). https://www.parksjournal.com/wp-content/uploads/2019/05/PARKS-25.1-Van-Zyl-10.2305-IUCN.CH_2019.PARKS-25-1HVZ.en_-1.pdf.

Assumptions underlying Table Seven

117. The annual gross revenue estimates in Table Seven are preliminary and are based on the following major assumptions:
- Levy is implemented at the sites identified in Table Five and at the amounts set out in Table Six.
 - 70 per cent of visitors (New Zealand and international) are willing to pay \$100 to access larger experiences and \$50 to access smaller experiences.²⁹
 - Demand is inelastic within the levy amount range given.
 - No induced demand as a result of the additional revenue spend, and visitor numbers cannot grow beyond the number when there is no access levy.
 - No discounts/exemptions (despite these being anticipated), and a two-times differential price for international visitors.
 - Non-compliance by 15 per cent of visitors.
118. The gross revenue estimates will be sensitive to changes in these assumptions. New Zealanders' willingness to pay may be significantly lower than that of international visitors because the levy would likely make up a larger proportion of total trip cost for New Zealanders³⁰ and the potential for New Zealanders to respond to the levy by substituting out experiences on PCL for recreation alternatives (due to a greater availability of alternatives compared to international visitors).³¹
119. Cost is already a significant barrier to many New Zealanders accessing iconic experiences on PCL, with this being a key theme of submissions we received from groups such as hunters and trampers. A survey from 2023 found that it was the biggest barrier to visiting Piopiotahi Milford Sound for 51 per cent of New Zealanders surveyed.³²
120. The assumption of inelastic demand fits the willingness to pay assumption. However, the elasticity assumption is likely unrealistic for higher levy amounts. Visitor numbers may rapidly decline if the levy amount exceeds the \$100 used as a benchmark in the assumptions. The further the levy amount is below or above this benchmark, the more uncertainty there is in the resulting revenue estimate. If demand is actually elastic, higher charges could lead to a reduction in visitor numbers, resulting in lower-than-expected revenue. Further willingness to pay data will be required for greater certainty of the impact of the levy on demand.
121. Preliminary sensitivity analysis has been undertaken on willingness to pay assumptions. To do this the proportion of visitors willing to pay \$100 to access larger experiences and \$50 to access smaller experiences was adjusted by $\pm$ 20 per cent. This returned a range of \$46.8 - \$72.5 million estimated gross annual revenue, both of which return positive net present value over five-years.

29 See Kantar. (2021).

30 Because travel costs for New Zealanders are likely to be lower.

31 Peterson, G. L., Stynes, D. J., Rosenthal, D. H., & Dwyer, J. F. (1984, March 22-23). Substitution in recreation choice behaviour. In *Proceedings of the Recreation Choice Behaviour Symposium*, Missoula, MT.
https://www.fs.usda.gov/rm/pubs_int/int_gtr184/int_gtr184_019_030.pdf.

32 Kantar. (May 2023). *Consumer insights to support development and implementation of the Milford Opportunities Project Masterplan: New Zealand market insights*. <https://www.milfordopportunities.nz/assets/Final-Milford-Opportunities-Project-Masterplan-Domestic-Consumer-v2.pdf>.

122. Revenue estimates will also vary depending on the total number of sites where access charges are introduced; while we recommend piloting an access levy at four sites, there may be a case for a wider use of access levies should the pilots prove successful.

Gross revenue estimates are relatively significant

123. The estimated gross revenue is significant when compared to the size of DOC's total operating budget of \$709 million (2025/26). Option 4A's estimated gross revenue of \$67 million equates to 9.5 per cent of DOC's 2025/26 budget and Option 4B's estimated \$62 million equates to 8.7 per cent. Beyond ensuring current visitor and biodiversity outcomes are appropriately funded, revenue of this scale provides an opportunity to increase the number of threatened species managed (\$67 million equates to an additional 250 species managed) and improve visitor experiences. Initial visitor projects could include updating and replacing utilities and visitor infrastructure in Milford Sound, which the Milford Opportunities Business Case estimated would cost over \$110 million in the next 10 years.³³
124. Locations and levy amounts would be subject to further consultation and analysis before they are specified in regulations.

Indicative implementation, administration and operational costs

125. To meet the primary objective in this RIS of improving conservation outcomes and visitor experiences through increased net revenue for conservation, levy revenue must exceed costs. Net revenue is challenging to estimate before detailed implementation planning. Some costs are highly site specific and will depend on interactions with DOC's existing visitor management interventions. When further information and evidence is available during the development of the next RIS(s) net revenue will be recalculated.
126. Rough-order costs are estimated in Table Eight for the implementation, administration and operation of the levy.

Table Eight: Rough-order estimate of cost to implement, administer and operate the levy, and indicative five-year net present value

Present value (\$ millions)		
Five year total	Option 4A (DOC preferred)	Option 4B (Minister preferred)
OPEX	9 (2) (i)	9 (2) (i)
Gross revenue	254.8	236.6
Net present value	9 (2) (i)	9 (2) (i)

33 *Milford Opportunities Ministerial Advisory Group.* (June 2024). Milford Opportunities Project Business Case: A feasibility assessment using Better Business Case methodology. Projects include upgrades to wastewater and potable water, the electricity cable and power supply; new visitor protection refuges; new toilets; decontamination of the Cleddau Flat; and roading improvements at Cleddau Flat. The projects were expected to be completed between 2027 and 2034.

[Redacted]

9 (2) (i)

[Redacted]

[Redacted]

[Redacted]

- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]
- [Redacted]

34 This discount rate is known as the “social rate of time preference” rate. It has been used here as the option has mainly non-commercial costs and benefits, valuing long term impacts. Preliminary sensitivity analysis was also conducted for a discount rate of 8 per cent, known as the “social opportunity cost of capital” rate. This rate is used when costs and benefits are mainly commercial, involving more risk. This rate also returned a net positive return on investment. See <https://www.treasury.govt.nz/information-and-services/public-sector-leadership/guidance/reporting-financial/discount-rates>, and <https://www.treasury.govt.nz/sites/default/files/2024-10/treasury-circular-2024-15.pdf>.

35 9 (2) (i)
36 9 (2) (i)

- 9 (2) (i) [REDACTED]
- [REDACTED]³⁷

128. If Cabinet progresses with an access levy, DOC will engage with international counterparts and vendors to better understand implementation options and associated costs will be. This will inform the RIS to accompany site specific regulations.

37 The more complex and extensive the access charging exemption system, the higher the ongoing administrative/operational costs.

Cost benefit analysis – Option 4A (DOC’s preferred option)

Affected groups	Comment	Impact	Evidence certainty
Additional costs of the preferred option compared to taking no action			
Visitors <i>Regulated parties</i>	Cost associated with paying the levy. Reduced visitor numbers due to the levy amount.	High \$36–90 million per year (see Table Seven).	Medium Levy amounts and locations will be determined in regulation.
Department of Conservation <i>Regulator</i>	Costs associated with implementation, administration and operation of the levy.	Medium 9 (2) (i) over 5 years expressed in present value.	Low Additional contingency of 50 per cent added to account for low evidence certainty.
Iwi, volunteers, locals <i>Other</i>	Potential cost associated with engagement on setting levy. Potential non-monetary cost associated with price barriers to accessing PCL.	Low	Low
Concessionaires <i>Other</i>	Costs associated with ensuring client compliance with levy requirements and complying with any exemption requirements. Potential reduced profits due to lower visitor numbers in the short to medium term, and/or visitors having less disposable income.	Low	Low
Businesses (excluding concessionaires) <i>Other</i>	Potential for reduced profits due to possible lower international arrival numbers if New Zealand is viewed as a higher cost tourism destination, and/or international visitors having less disposable income.	Low	Medium
Total monetary costs		9 (2) (i) over 5 years expressed in present value.	Low
Non-monetary costs		Medium	Low

Affected groups	Comment	Impact	Evidence certainty
Additional benefits of the preferred option compared to taking no action			
Visitors <i>Regulated parties</i>	Would benefit from levy spending, including from investment into conservation projects adjacent to the visitor experience and improved facilities for visitor experiences.	High	Medium
Department of Conservation <i>Regulator</i>	Benefits from collecting an estimated gross revenue of \$36–90 million per year from the four locations in the Cabinet paper. Actual revenue will be dependent on design choices such as price, discounts and exemptions, as well as the assumptions outlined earlier in this section (such as demand being inelastic). Note the spending of revenue will also result in non-monetary benefits.	High \$36–90 million per year (see Table Seven).	Medium
Iwi, Hapū and whānau <i>Other</i>	Could benefit from levy spending, including potential increased cultural story telling at site (e.g. increased signage and artwork).	Low	High
Concessionaires <i>Other</i>	Would benefit from levy spending, from DOC offering a higher number of experiences that are desirable (and suitable) for a wider range of visitors, providing an increased number of clients and potentially increasing their willingness to pay.	Low	High
The environment <i>Other</i>	Would benefit from levy spending, resulting in enhanced investment in biodiversity. This could include initiatives such as breeding programmes and pest control. Also potential benefit from levy spending of decreased environmental degradation because of investment in facilities (e.g. boardwalks to protect wetlands).	High	Medium
Total monetary benefits		\$36–90 million per year (see Table Seven).	Medium
Non-monetary benefits		Medium	High

Cost benefit analysis – Option 4B (Minister’s preferred option)

Affected groups	Comment	Impact	Evidence certainty
Additional costs of the preferred option compared to taking no action			
Visitors <i>Regulated parties</i>	Cost associated with paying the levy. Reduced visitor numbers due to the levy amount.	High \$34–83 million per year (see Table Seven).	Medium Levy amounts and locations will be determined in regulation.
Department of Conservation <i>Regulator</i>	Costs associated with implementation, administration and operation of the levy. May have a relatively higher ongoing cost compared to Option 4A due to the need to administer an exemptions system.	Medium 9 (2) (i) over five years expressed in present value.	Low Additional contingency of 50 per cent added to account for low evidence certainty.
Iwi, volunteers, locals <i>Other</i>	Potential cost associated with engagement on setting levy.	Low	Low
Concessionaires <i>Other</i>	Costs associated with ensuring client compliance with levy requirements and complying with any exemption requirements. Potential reduced profits due to lower visitor numbers in the short to medium term, and/or visitors having less disposable income.	Low	Low
Businesses (excluding concessionaires) <i>Other</i>	Potential for reduced profits due to possible lower international arrival numbers if New Zealand is viewed as a higher cost tourism destination, and/or international visitors having less disposable income.	Low	Medium
Total monetary costs		9 (2) (i) over five years, expressed in present value.	Low
Non-monetary costs		Medium	Low

Affected groups	Comment	Impact	Evidence certainty
Additional benefits of the preferred option compared to taking no action			
Visitors <i>Regulated parties</i>	Would benefit from levy spending, including from investment into conservation projects adjacent to the visitor experience and improved facilities for visitor experiences.	High	Medium
Department of Conservation <i>Regulator</i>	Benefits from collecting an estimated gross revenue of \$34–83 million per year from international visitors at the four locations in the Cabinet paper. Actual revenue will be dependent on design choices such as price, discounts and exemptions, as well as the assumptions outlined earlier in this section. Note the spending of revenue will also result in non-monetary benefits.	High \$34–83 million per year (see Table Seven).	Medium
Iwi, Hapū and whānau <i>Other</i>	Could benefit from levy spending, including benefits associated with potential increased cultural story telling at site (e.g. increased signage and artwork).	Low	High
Concessionaires <i>Other</i>	Would benefit from levy spending, from DOC offering a higher number of experiences that are desirable (and suitable) for a wider range of visitors, providing an increased number of clients and potentially increasing their willingness to pay.	Low	High
The environment <i>Other</i>	Would benefit from levy spending, resulting in enhanced investment in biodiversity. This could include initiatives such as breeding programmes and pest control. Also potential benefit from levy spending of decreased environmental degradation because of investment in facilities (e.g. boardwalks to protect wetlands).	High	Medium
Total monetary benefits		\$34–83 million per year (see Table Seven).	Medium
Non-monetary benefits		Medium	High

Section 3: Delivering an option

Implementation

129. New legislation would be required to empower DOC to collect the levy, and DOC would be responsible for its ongoing operation and enforcement. The levy could be collected online, on site and/or through a concessionaire (noting that visitors not using a concessionaire would have to pay online or at site).
130. If the legislative amendments to enable Option 4A or Option 4B regulations would be developed with the details necessary to implement and enforce the levy. This would be accompanied by a further RIS and a stage 2 CRIS. This subsequent analysis will include robust quantified information on implementation costs and visitor willingness to pay. If legislative amendments are progressed, statutory plans and policies such as the Conservation General Policy will need to be updated.
131. Actual implementation of the levy is estimated to take place by the end of 2027 at the earliest. This will provide time for DOC to:
- investigate detailed options for implementation on site (e.g. barrier arms over road, spot checks, online booking)
 - develop a communications plan
 - undertake targeted consultation with stakeholders and engage with Iwi
 - secure implementation funding
 - install any infrastructure to assist with levy collection
 - hire additional staff to undertake functions related to the levy (e.g. compliance and administration)
 - start levy collection.
132. As stated above, implementation will require capital and operational funding. Options for sourcing this funding are being explored, including baseline reprioritisation and IVL funding. Ongoing funding for compliance and administration would be funded from the levy fund itself.

Implementation risks

133. There are risks to the successful implementation of Option 4A/Option 4B to satisfy the objectives outlined in this RIS. These implementation risks will be analysed in more detail in the subsequent RIS(s). They include:
- **Lack of public buy in** – resulting in risk to staff health and safety, infrastructure vandalism and levy-avoidance (i.e. low compliance). This can be mitigated through exemptions and discounts, alongside careful site selection.
 - **Negative impacts on DOC's relationships with local Iwi and stakeholders** – potentially resulting in more difficult implementation, legal challenges, and delays. This can be mitigated through exemptions and discounts, as well as through engagement with Iwi and stakeholders.
 - **Visitor impacts and redistribution** – risk that prices may deter visitors from visiting PCL, or push visitors to less-prepared or ecologically sensitive areas. This will be mitigated by commissioning further willingness to pay studies.

- **Reduction in Crown funding** - partially or fully offsetting levy revenue, negating the benefits from improved conservation outcomes and visitor facilities.
- **Congestion** – risk of poor visitor flow (congestion) along roadways, in car parks, and along tracks. This will be mitigated through visitor monitoring and visitor management.
- **Lack of authority over adjacent areas** – risk relating to private land, public roads and foreshore enabling visitors to bypass compliance measures, undermining the effectiveness of levy collection. This will be mitigated by identifying existing issues and ensuring these are considered by drafters.
- **Integration issues** – risk of poor visitor experience or double charging from poor integration with existing systems. This will be mitigated by considering all existing systems during implementation.
- **Weather conditions and environmental factors** – risk of delay of the installation of infrastructure or unexpected visitor behaviour (e.g. closure of the Hooker Valley Bridge in Aoraki / Mount Cook National Park in 2025 due to erosion, closure of Cathedral Cove walkway). This will be mitigated by factoring in this uncertainty into implementation timelines.
- **9 (2) (g) (i)** [REDACTED]
- **Insufficient funding** – risk of inadequate funding being available as unexpected costs arise. This will be mitigated by working in contingencies into implementation budgets.

Monitoring, evaluation, and review

Collection and expenditure

134. Feedback on the public consultation showed a strong desire for transparency and accountability with regards to the collection and expenditure of the proposed levy. The Government proposes to do annual reporting on the levy revenue and expenditure.
135. Appropriate review and evaluation processes will be established for expenditure programmes, as part of final expenditure decisions.
136. DOC will continue to engage with other agencies in New Zealand and overseas to improve the effectiveness of our management of the levy.

Consultation and review

137. Before implementation, local stakeholders would be consulted, and Iwi would be engaged on the proposed levy. This would provide them with an opportunity to input into the design of the levy and how it is collected, reducing the risk of unforeseen consequences.
138. The Government proposes a maximum period between reviews of five years. This would ensure that there is certainty for visitors and concessionaires on what visitors will need to pay while ensuring that the system is operating well. If these reviews result in any

significant proposed changes to the levy (e.g. beyond inflation adjustment), further consultation with local stakeholders and engagement with Iwi would be required.

Visitor numbers and satisfaction

139. DOC would monitor visitor numbers at sites where the levy is applied through track and road counters. Future installation of cameras may be contemplated to improve the accuracy of data collected. Qualitative data on visitor satisfaction would also be collected through visitor surveys, such as the 'Public Pulse of Conservation' and the 'International Visitor Survey'.
140. Success would look like high visitor satisfaction reported through surveys and continued demand for the experience at the pilot sites. If visitor numbers or visitor satisfaction declines unexpectedly due to the levy, this may prompt an earlier review of the levy. Other early prompts for review include unexpected distribution impacts, decline in environmental indicators or issues with visitor management.
141. Sites where charges are not used would be monitored for two reasons:
 - to provide a control to compare the impact of the charges
 - to prevent potential adverse impacts from the substitution behaviour of visitors and ensure they are being directed to locations with appropriate facilities



Briefing: Access charging – types of charges and who they apply to

To	Minister of Conservation	Date submitted	9 April 2025
Action sought	Confirm your preferred option to present to Cabinet to take forward access charges for some public conservation land.	Priority	High
Reference	25-B-0124	DocCM	DOC-10231819
Security Level	In Confidence		

Risk Assessment	High	Timeframe	14 April 2025
Attachments	Attachment A: Deep dive slides Attachment B: Pros and cons of options and revenue estimates		

Contacts	
Name and position	Phone
Ewan Delany, Acting Deputy Director-General, Policy and Regulatory Services	9 (2) (a)
Siân Roguski, Director, Policy (Biodiversity, International and Funding)	9 (2) (a)
James Johnson, Manager, Budget and Funding Policy	9 (2) (a)

Executive summary – Whakarāpopoto ā kaiwhakahaere

We recommend enabling access charging for New Zealanders and international visitors, but putting policy settings in place to limit the impact on access

1. Access charging is a significant opportunity to deliver on your priority to generate new revenue and recalibrate costs in the conservation portfolio.
2. In light of feedback from public consultation, we have developed three options for how you could progress access charging. The key policy decisions are whether New Zealanders should be charged and, if so, how much.
3. We recommend taking forward the broadest option, **Option 1**, that enables the charging of international visitors and New Zealanders at entry to a prescribed area of PCL and for the use of tracks. The other options are:
 - **Option 2**: enable charging of international visitors for entry and use of tracks, and enable charging of New Zealanders for tracks only (i.e. not for 'entry to an area')
 - **Option 3**: enable charging of international visitors for entry and use of tracks and not enable/introduce new charges for New Zealanders.
4. Option 1 would generate the most net revenue to help maintain and improve visitor experiences on public conservation land (PCL) (9 (2) (g) (i)) and would give the Government significant flexibility in how access charges are implemented now and in the future.
5. Option 2 generates slightly less revenue and reduces the Government's flexibility to charge New Zealanders in the future. It could also have fewer implications for maintaining New Zealanders' access to public conservation land and Treaty of Waitangi / Tiriti o Waitangi (**Treaty**) considerations given its focus on charging New Zealanders for use of track infrastructure provided by the government.
6. You have a range of levers to mitigate any negative impacts from access charges. We consider that the potential negative impacts of applying access charges to New Zealanders (see Options 1 and 2) could be mitigated through policy settings, such as:
 - targeting charges to a small number of highly visited places
 - using differential pricing, discounts and exemptions for New Zealanders or user groups (e.g. hunters)
 - determining details of each charge on a case-by-case basis, in consultation with local communities and Iwi (and Hapū).
7. Further, Cabinet will need to consider the Crown's Treaty obligations, including section 4 of the Conservation Act, when making decisions on access charging. (9 (2) (g) (i))
8. (9 (2) (g) (i))
 - (9 (2) (g) (i))
 - (9 (2) (g) (i))
 - (9 (2) (g) (i))
9. Advice on these will be covered in more detail in upcoming briefings **25-B-0125** and **25-B-0126**.

We recommend that you ... (Ngā tohutohu)

		Decision
a)	Note that most submitters opposed New Zealanders being charged for access to public conservation land, but the majority supported charging international visitors.	<i>Noted</i>
b)	Indicate your preferred option to recommend to Cabinet: EITHER i) Option 1 (recommended): enable the charging of international visitors and New Zealanders at entry to a prescribed area of PCL <u>and</u> for the use of tracks OR ii) Option 2: enable charging of international visitors for entry and use of tracks, and enable charging of New Zealanders for tracks only (i.e. not for 'entry to an area') OR iii) Option 3: enable charging of international visitors for entry and use of tracks and not enable/introduce new charges for New Zealanders.	Yes / No Yes / No Yes / No
c)	Note that Options 1 and 2, which involve charging New Zealanders, have implications for access and for the Crown's Treaty of Waitangi / Tiriti o Waitangi obligations, which can be partially mitigated through policy settings.	<i>Noted</i>
d)	Agree to forward this briefing to the Minister of Finance, Minister of Transport, Minister of Tourism and Hospitality, Minister for Hunting and Fishing and coalition partners to test their views on your preferred option ahead of circulating your Cabinet paper for Ministerial consultation.	Yes / No

9 (2) (a)

Ewan Delany
Acting Deputy Director-General,
Policy and Regulatory Services

9/14/25

Hon Tama Potaka
Minister of Conservation

Date: / /

Purpose – Te aronga

To provide advice and seek direction to inform the drafting of your Cabinet paper on introducing access charges, focussed on the types of charges and for whom.

Background and context – Te horopaki

1. This is the first paper in a series of briefings to get your decisions on how you would like to take your proposal to charge for access to some parts of public conservation land (**PCL**) forward, following public consultation.
2. The timing of these papers aims to achieve your intent of passing legislative reforms within this parliamentary term. We recommend you deliver a paper to Cabinet for their consideration and approval on 30 June 2025. **Table 1** sets out the forward plan of these briefings leading to the development of your Cabinet paper.

Table 1: Forward timeline of advice/decisions

Date	Briefings: focus of advice and the decisions we will seek from you
9 April 2025	• Potential types of charges • Who these charges apply to
Mid-April 2025	• Specific changes needed now to primary legislation for area-based access charges and track charges
Early May 2025	• Where to use charges
15 May 2025	• Draft Cabinet paper • Draft summary of submissions

3. On Thursday 3 April 2025 we had a ‘deep dive’ session with you on your access charging proposal. Slides from this session are included in **Attachment A**. Key takeaways included that you:
 - indicated a preference for charging international visitors and charging New Zealanders in some situations
 - thought it was important that any charges were proportionate to the services being charged for
 - wanted further information on potential sites, including visitor demographics.

Initial results from public consultation and stakeholder engagement provide a mixed view of support for introducing charges

Survey submitters supported charging international visitors and opposed charging New Zealanders

4. As we are still analysing the 7,473 submissions we received, our advice primarily draws upon the 2,393 online survey submissions and submissions from some key stakeholders, as data could readily be drawn from these. We will provide you with a summary of submissions alongside the draft Cabinet paper on 15 May 2025.

5. Around 64 per cent of survey respondents opposed the Government introducing the ability to charge for access to some parts of PCL. However, when asked to what extent they supported charging New Zealanders and/or international visitors, respondents showed strong opposition to charging New Zealanders and the majority supported charging international visitors.¹

Table 2: Survey feedback on who should pay access charges

	Strongly oppose	Oppose	Neutral	Support	Strong support
Charging everyone	74%	12%	5%	5%	4%
Charging everyone, but New Zealanders pay less	60%	18%	6%	8%	8%
Charging only international visitors	9%	7%	12%	22%	50%

6. This is consistent with themes from our engagement with Iwi (and Hapū) and feedback on the public consultation from stakeholders.

Iwi and Hapū supported charging international visitors and had mixed views on charging New Zealanders

7. We heard the following themes from our regional hui with Iwi (and Hapū):
- strong support for charging international visitors
 - mixed views on charging New Zealanders
 - mixed views on exempting all Māori from access charging, or just members of Iwi with mana whenua in that rohe (both views were commonly expressed)
 - views that Iwi and those with ahi kā connections to whenua should be involved in access charging decisions in their rohe.

Stakeholders supported charging international visitors and had mixed views on New Zealanders

8. We identified the following themes from our initial analysis of stakeholder submissions:
- Recreation, hunting and fishing stakeholders: broadly support charging international visitors, while most are opposed charging New Zealanders due to concern about creating a price barrier, equity issues, impacting New Zealanders' ability to hunt, and feeling that PCL belongs to all New Zealanders. Targeted charges for specific facilities are seen as more palatable than charging for access.
 - Tourism stakeholders: support charging international visitors, with mixed views about whether New Zealanders should be charged. Some groups are concerned about double charging with concession fees, and/or the International Visitor Conservation and Tourism Levy (IVL).
 - Environmental NGOs: support charging international visitors, with mixed views about charging New Zealanders. Support for charging was based on the potential to increase funding for conservation work.

¹ Some submissions are unclear about whether the submitter opposes *any* access charge and only supports charging international visitors if there was no other option. Conversely, some submitters clearly oppose access charges generally but still support charging international visitors.

We recommend confirming your objectives for access charging in your Cabinet paper

5. We have used the objectives in **Table 3** to inform our advice on access charges, which draw from the discussion document and key themes from public consultation. We suggest they are included in your Cabinet paper.

Table 3: Objectives for access charging work programme

Objective	Access charging should ...
Creating net benefit	... ensure a positive return on investment. This includes factoring in the anticipated benefits of spending revenue generated (e.g. improved visitor offering, programmes to provide access, better biodiversity) and the anticipated costs, such as implementation costs.
Ensuring access for New Zealanders	... recognise the Department of Conservation's (DOC's) functions set out under section 6 of the Conservation Act 1987 to conserve natural and historic heritage, foster recreation and allow for tourism. Access provides benefits for cultural identity, conservation, health, wellbeing and the economy.
Improving equity	... support a more equitable charging system. Access to experiences on PCL creates private benefits, as well as costs for the Crown. Where appropriate, those that impose cost and receive private benefits should make fair contributions towards their use. This balances equity across different user groups, and between users and taxpayers.

There are two types of charges: Area-based access charges and track charges

9. Using the proposed objectives, we have considered the introduction of two types of charges that are not enabled under the current legislation.

Table 4: Types of access charges

Charge	Explanation
Area-based access charges Charging at entry to a prescribed area of PCL	- A charge for visitors entering a prescribed area containing a range of visitor experiences to fund the maintenance and improvement of those experiences and wider national conservation priorities. - The areas where these charges apply could be set out in regulations, alongside other details such as the price and criteria for future area selection. - Examples potentially include charging for access down the State Highway 98 corridor to Milford Sound (Fiordland National Park) and down State Highway 80 to Aoraki Mount Cook National Park. - Only paying visitors and those who are exempt can access.
Track charges Charging for the use of tracks	- A charge for the use tracks and paths, potentially covering wider facilities (e.g. toilets, shelters, interpretation panels). - This could be useful where visitors are using an experience which requires a relatively high level of facilities in a relatively small area (e.g. Tongariro Alpine Crossing) or their use results in a relatively high impact (e.g. mountain bikers on the Heaphy Track). - The tracks where charges apply could be set out in regulations, alongside other details such as the price and criteria for future track selection. - Track charges still have the potential to negatively impact access but are less likely to capture other users (e.g. hunters) and are closer to existing facility charges, (e.g. for carparks, huts, campsites).

We have assessed three options for these charges

10. We assessed three options for how you could progress enabling the charges above, based on who should be required to pay them.

Table 5: Options for who should pay what type of charge

Option	Explanation	Area-based		Track	
		NZ	Intl.	NZ	Intl.
Option 1 <i>Recommended</i>	Enable charging of international visitors and New Zealanders at entry to a prescribed area of PCL and for the use of tracks.	✓	✓	✓	✓
Option 2	Enable charging of international visitors for entry and use of tracks, and enable charging of New Zealanders for tracks only (i.e. not for 'entry to an area').		✓	✓	✓
Option 3	Enable charging of international visitors for entry and use of tracks and not enable/introduce new charges for New Zealanders.		✓		✓

We recommend Option 1 to provide the greatest flexibility and effectiveness

11. We recommend Option 1 as it is likely to be the most effective at generating revenue to maintain and improve visitor experiences on PCL and would give the Government significant flexibility in how it implements assess charges. This reflects the Government's priority to generate more revenue for conservation.
12. This option also provides the highest amount of flexibility to address equity issues in the current charging system. Enabling significant flexibility would leave the door open to the widest range of implementation options, including introducing a 'parks pass', charges at entry to popular areas or charges for the use of popular tracks. Ensuring the legislation is enabling and flexible would also improve its longevity, as it would be able to adapt as visitor use of PCL evolves.
13. A high-level summary of the pros and cons of each option is included in **Table 6** below. A full summary of the pros and cons of each option, and high-level revenue estimate details, are included in **Attachment B**.

Table 6: Summary of pros and cons of each option

Option	Est. net revenue	Pros	Cons
1	9 (2) (g) (i) [REDACTED]	- Highest net revenue. - Significant flexibility. - Lower system complexity. - Improved equity.	- Contrary to many submissions. - Price could be a barrier for some New Zealanders. - Likely risk of Treaty implications.
2	9 (2) (g) (i) [REDACTED]	- High net revenue. - Some flexibility to charge New Zealanders. - Improved equity. - Consistent with many submissions received. - Lower risk of Treaty of Waitangi implications. - Reduces barriers to access for some New Zealanders compared to Option 1.	- No access charging revenue from New Zealanders visiting places like Milford Sound and Aoraki. - More complex charging system. - Limits future flexibility to introduce charges.

Option	Est. net revenue	Pros	Cons
3	9 (2) (9) (0)	- Moderate net revenue. - Consistent with the majority of submissions received. - Lowest risk of Treaty of Waitangi implications. - Minimises barriers to access for New Zealanders compared to Option 1 and 2.	- No access charging revenue from New Zealanders visiting places like Cathedral Cove, Franz Josef, Tongariro Alpine Crossing, Milford Sound and Aoraki. - Potential inequities not addressed for New Zealanders. - More complex charging system. - Greater risk of perceived overlap with the IVL.

However, we understand from the deep dive that your preferred option is Option 2

14. During our deep dive you indicated a preference for charging international visitors and potentially charging New Zealanders in some situations. While we recommend Option 1, there are benefits to Option 2 as a middle ground. Option 2 would mean charging all visitors for experiences such as the Tongariro Alpine Crossing, while only international visitors are charged to access places like Piopiotahi Milford Sound.
15. Option 2 still has high revenue potential but also acknowledges the benefits of access by New Zealanders and feedback from the public consultation. It also reduces risk related to the Crown's Treaty of Waitangi / Tiriti o Waitangi (**Treaty**) obligations (discussed in detail later).

Supportive policy settings could mitigate some of the downsides of access charges

16. Where access charges are applied to New Zealanders (Option 1 and Option 2), any potential negative impacts could be mitigated through policy settings for the design of the access charging regime, for example:
 - a. charges are targeted to a small number of highly visited places
 - b. the use of differential pricing, discounts and exemptions for New Zealanders or user groups (e.g. hunters)
 - c. determining details of each charge on a case-by-case basis, in consultation with local communities and Iwi (and Hapū).

Treaty principles (section 4) – Ngā mātapono Tiriti (section 4)

17. Section 4 of the Conservation Act states:

"This Act shall so be interpreted and administered as to give effect to the principles of the Treaty of Waitangi."
18. Section 4 does not explicitly prohibit charging tangata whenua for access to PCL. However, the connection between access to land and cultural identity was a strong theme we heard during the Government's engagement with Iwi (and Hapū) on access charging.
19. Many Iwi (and Hapū) representatives expressed it would be inappropriate to charge members of Iwi (and Hapū) to access PCL within their rohe, as this would interfere with their cultural identity, negatively impact their kaitiaki relationships with their taonga and be seen as a further alienation of their whenua.
20. The Waitangi Tribunal's report WAI 262 *Ko Aotearoa Tēnei* found that Article 2 of the reo Māori text of the Treaty guaranteed kaitiaki would have tino rangatiratanga over

their taonga. The Tribunal found that because of this, the relationship between kaitiaki and taonga is entitled to a reasonable degree of protection.²

21. 9 (2) (g) (i) [REDACTED]
22. 9 (2) (g) (i) [REDACTED]
23. These policy settings will be discussed in more detail in forthcoming **briefing 25-B-0125**.
24. If you decide to recommend either Options 1 or 2 to Cabinet, we will provide you with further advice ahead of Cabinet on the interaction between access charges and section 4 of the Conservation Act 9 (2) (g) (i) [REDACTED] and opportunities to reflect the Crown's Treaty obligations in the design of the access charging regime.

Risk assessment – Aronga tūraru

25. The timeframes for getting Cabinet agreement to legislative change to enable access charges within this parliamentary term are tight. To achieve these timeframes requires:
- your feedback on your preferred approach by 14 April 2025, so it can inform the drafting of your Cabinet paper
 - the paper to be considered at Cabinet Economic Committee by 26 June 2025 and Cabinet by 30 June 2025 to ensure drafting instructions are issued to the Parliamentary Counsel Office (**PCO**) no later than the end of July 2025
 - securing time in the House for the legislative process, noting that the Conservation Amendment Bill has an agreed priority of 5 (proceed to select committee in 2025).

Next steps – Ngā tāwhaitanga

26. We will use your direction to inform any further advice and the drafting of your Cabinet paper, which we will provide to you on 15 May 2025.
27. If Option 1 or Option 2 are your preferred options, we will provide you with further advice on the interaction between access charges and section 4 of the Conservation Act, and opportunities to reflect the Crown's Treaty obligations in the design of the access charging regime.

2 Waitangi Tribunal. (2011). *Ko Aotearoa tēnei: A report into claims concerning New Zealand law and policy affecting Māori culture and identity* (Wai 262). Page 703.

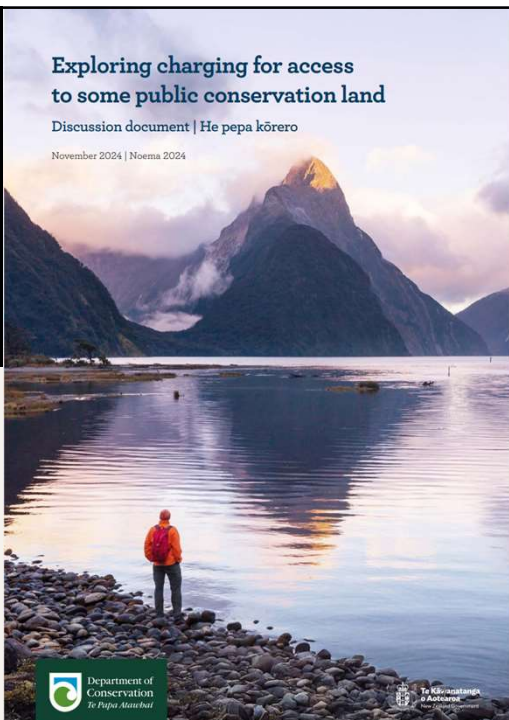
28. We recommend that you discuss your preferred option with your Cabinet colleagues, including the Minister of Finance, Minister of Tourism and Hospitality, Minister of Transport, Minister for Hunting and Fishing and coalition partners to test their views ahead of circulating your Cabinet paper for Ministerial consultation. You could also forward this advice to support your discussions.

ENDS

Deep dive on access charging

Conservation Amendment Bill
2 April 2025



Exploring charging for access to some public conservation land
Discussion document | He pepa kōrero
November 2024 | Noema 2024




1

Agenda

Initial advice on:

- Objectives for access charging
- Initial analysis of submissions
- Where and who to charge
- How we set access charging rates

To note:

- We will provide further detailed advice on how to allocate additional revenue and investment priorities. These issues will not be covered in this session.

2

2

Objectives of access charging proposal

We recommend that your access charging proposal seeks to address three key problems:

- we need more money to maintain our activities
- the costs of funding the conservation system are not fairly shared
- we have problems with too many visitors at some sites

The proposal also must align with DOC's core legislative functions, which include:

- managing land for conservation purposes
- fostering recreation

3

3

Access charging would expand our toolkit, but it's not the only option

- Access charging is part of a suite of tools that could be used to increase revenue for conservation and improve visitor management.
- The best mix of tools or 'model' depends on the outcomes you are seeking and the context. In some contexts, adding access charging into our mixed model approach is likely to improve conservation and visitor outcomes.
- If you do not wish to progress with access charging or if you wish to focus on charging only international visitors, we can look for opportunities within our current model (e.g. expanding where we charge for carpark and donations).

Tools	Current model	Proposed model
<i>Donations</i>	✓	✓
<i>Concession fees</i>	✓	✓
<i>Hut fees</i>	✓	✓
<i>Campsite fees</i>	✓	✓
<i>Carpark fees</i>	✓	✓
<i>Facility passes</i>	✓	✓
<i>Track charge</i>	X	✓
<i>Charge to enter areas of PCL</i>	X	✓

4

4

If Cabinet wishes to progress with access charging...

We need agreement to key policy decisions and the legislative framework for access charges

Today's session focuses on 'who' and 'where' to charge, and the basis for charging

Cabinet's key decisions **needed now** (before the introduction of the Bill) relate to what changes are needed to primary legislation

This includes:

- Purpose of the charge
- Who the charge applies to (today's session)
- How we set the rate of the charge (today's session)
- The scope of what the revenue can be spent on
- Regulation making powers including:
 - Where the charge applies (today's discussion)
 - Where the revenue is allocated

The detail in secondary and implementation planning, can be confirmed later by you and Cabinet (depending on the decisions required)

This includes:

- Where and 'how' to charge (specific areas, methods of collection etc.)
- Specific discounts and exceptions
- The rates for different experiences

We will come back to you with a more detailed timeline on the legislative process and implementation.

5

5

What we asked in the discussion document - related to today's session

We asked for public feedback on:

Who to charge

To what extent do you support:

- Charging everyone?
- Charging everyone but charging New Zealanders less than international visitors?
- Charging only international visitors?

Where to charge

Do you agree that access charges would be effective in the types of places identified in the discussion document?

6

6

Interim analysis of submissions on ‘who’ and ‘where’ to charge

General public

Over **7,400 submissions** were received through the online survey or via email, including **~4,800 form submissions from Forest & Bird members**.

The form submissions are high-level and don't directly answer our consultation questions. We infer they oppose charging New Zealanders.

Early analysis of the online survey results tells us that:

- **64% of respondents opposed charging for access**
- When asked who should be charged,
 - 86% opposed charging everyone
 - 72% supported charging internationals
- When asked where charges should be implemented,
 - 51% agreed that access charges should be limited to some areas of PCL
 - 43% agreed with the features we identified for where access charging could be used (e.g. places facing unsustainable pressure from visitors, etc.)

These statistics exclude pro forma submissions, and submitters who were unsure, or refrained from answering the particular consultation question

Key stakeholders

- Many stakeholders oppose charging New Zealanders because they see free access to PCL as fundamental to our national and cultural identity
- Many stakeholders support charging internationals to mitigate their impact, and because they have different rights to New Zealanders
- More insights on the submissions of specific key stakeholder groups are provided in the appendix.

Treaty Partners

Submissions from Treaty partners are still being analysed. In the meantime, we heard during the regional hui that:

- Iwi and those with ahi kā connections to whenua should be involved in access charging decisions in their rohe
- There was strong support for charging international visitors, and mixed views on charging New Zealanders
- There were mixed views on exempting all Māori, or just Iwi with mana whenua in that rohe – both views were commonly expressed

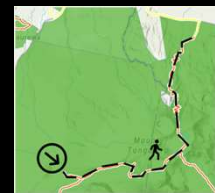
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Where could you introduce charging for international visitors and New Zealanders

Charging for entry to an area of PCL

Charging for the use of tracks



8

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Package 1: Provide DOC with maximum flexibility to charge international visitors and New Zealanders [our initial recommendation]

Enable DOC to charge both international visitors and New Zealanders...
to enter areas of PCL and to use tracks in PCL.

Key implications

- Gives the Government **significant flexibility**, including the option to introduce a 'parks pass' and/or entry to specific popular areas, and to charge for popular tracks.
- **Most revenue potential** and could be simpler to implement and enforce.
- Majority of submitters were **opposed to charging New Zealanders** (because, for example, access should be free on principle and/or that charging would create a cost barrier).
- The impact on access depends on the price and design of the scheme, including whether it includes differential pricing, discounts and exemptions. This option **enables more widespread use of charges**, which could affect many tourists and New Zealanders (depending where you charge).
- **9 (2) (g) (i)**

Example

- All visitors could be charged to enter Milford Sound (e.g. through a parks pass)
- All users could be charged for using the Tongariro Alpine Crossing track (e.g. through a track booking).

Note: you could make the legislation enabling (package 1), but the policy could start with only charging international visitors (package 3).

9

9

Package 2: Provide DOC with maximum flexibility to charge international visitors, and some ability to charge New Zealanders for tracks

Enable DOC to charge international visitors to **enter areas of PCL** and **to use tracks in PCL**.
AND to charge New Zealanders **to use tracks in PCL** (not for general entry to PCL).

Key implications

- Gives the Government **significant flexibility for international visitors**, but constrains where we can charge New Zealanders.
- Still has **high revenue potential** as majority of visitors to popular areas are international. Implementation and enforcement will be more complex due to the need to differentiate between users.
- The impact on access depends on the price and design of the scheme, including whether it includes differential pricing, discounts and exemptions. This option **enables more targeted introduction of charges**, which could affect many tourists but only some New Zealanders (depending where you charge).
- This option may be better received by some New Zealanders because instead of charging for entry (which challenges the principle of free access) it focuses on the specific facility being provided by DOC (i.e. the track).
- **9 (2) (g) (i)**

Example

- International visitors could be charged to enter Milford Sound (e.g. through a parks pass)
- All users (including New Zealanders) could be charged for using the Tongariro Alpine Crossing (e.g. through a track booking).

10

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Package 3: Enable DOC to charge international visitors, and use existing tools for New Zealanders

Enable DOC to charge international visitors **to enter areas of PCL** and **to use tracks in PCL** (not New Zealanders).

Key implications

- Gives the Government **significant flexibility for international visitors**, but we will not be able to charge New Zealanders for access. We can focus on using our existing tools instead (e.g. expanding use of car park fees or increasing donations).
- Still has **medium-high revenue potential** as majority of visitors to popular areas are international. Implementation and enforcement will be more complex due to the need to differentiate between users.
- The impact on access for international visitors depends on the price and design of the scheme. It will not affect the access of New Zealanders.
- **9 (2) (g) (i)**

Example

- International visitors could be charged to enter Milford Sound (e.g. through a parks pass)
- International visitors (not New Zealanders) could be charged for using the Tongariro Alpine Crossing (e.g. through a track booking).
- International visitors and New Zealanders could be charged for car parks at more locations and there is greater use of donations at trailheads.

11

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9 (2) (g) (i)

12

We recommend that you seek Cabinet approval to explore some initial sites for access charging, but that the selection criteria and further sites are confirmed later

13

13

We are seeking your initial direction on how we set the rate for access charging

- We will need to undertake further work to set the rate of the access charge.
- The rate could be different depending on the context and how we implement access charging (e.g. annual passes, single entry tickets per person or vehicle).
- The basis for the rate should be a consistent set of principles, which align with DOC's purpose and role and wider Government policy related to setting of fees and levies in the Public Sector.
- At this stage, we want to confirm
 - a) the basis for the rate (i.e. principles)
 - b) the process we will follow to set the rate for the first time
 - c) the process we will use in the future to update the rate.

14

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9 (2) (g) (i)

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What does this mean in practice?

Once we apply these principles to setting a rate, we are likely to recommend differential pricing for international visitors and New Zealanders.

This is because:

- international visitors are willing to pay more than New Zealanders, as the value of, and demand for, some experiences is very high, and charges are a smaller proportion of their trip costs
- an access charge is more likely to be a barrier to New Zealanders accessing PCL as New Zealanders are more price sensitive and have more alternative options for experiences.

We recommend you confirm price differentiation as above with Cabinet.

We also recommend that you consider discounts and waivers for some groups (e.g. children, lower income groups) – we will provide further advice on this issue.

16

16

Proposed approach to setting the rates, including consultation and approval

Ahead of implementing new access charges:

Step 1: DOC will identify appropriate experiences for access charging and seek your agreement to these

Step 2: DOC will then work to understand the willingness to pay / market rate for each experience

Step 3: DOC will undertake consultation with local communities, stakeholders and Iwi and Hapū.

Step 4: Final rates and locations are agreed by Cabinet, based on advice from you and feedback from communities.

Once charges are in place:

Step 1: DOC reviews access charges every 3 years. This is in line with our current hut and campsite price reviews, and legal requirements for concessions pricing reviews.

Step 2: Cabinet will agree to any price and location changes.

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Coming up

Date	Proposed schedule of advice
Early April	<i>Who charges should apply to Scope of potential charges</i>
Early April	<i>Rate setting Revenue allocation</i>
Mid April	<i>Visitor management and other issues</i>
Mid April	<i>Draft Cabinet paper Draft summary of submissions</i>
Date	Cabinet timeframes
30 April – 14 May	<i>Ministerial consultation</i>
21 May	<i>Cabinet Economic Priorities Committee</i>
26 May	<i>Cabinet</i>

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Appendix

Initial insights from submissions analysis

- Submissions analysis is still ongoing
- Meanwhile, these slides give you a flavour of what we are hearing in submissions
- We include key insights from a small sample of stakeholders
- Where possible, stakeholders representative of wider groups have been chosen
- We will provide you with a comprehensive thematic analysis in future

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Submissions analysis overview

- Public engagement was relatively high - with a total of 7,473 submissions
- Form submissions from Forest and Bird members make up 2/3 of all submissions

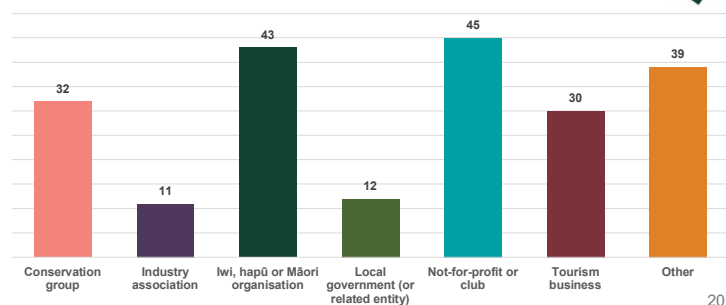
Note – final numbers are TBC, pending final data cleaning.

**7,473
submissions
total**

4,837 from
submissions from
Forest and Bird

2,424 from
interested
individuals

212
from
groups



20

20

Iwi and Hapū

Themes from regional hui on
'who' and 'where' to charge



- Iwi and those with ahi kā connections to whenua should be involved in access charging decisions in their rohe
- Mixed views on exempting all Māori from access charging, or just Iwi with mana whenua in that rohe – both views were commonly expressed
- Further engagement is needed on whether or how access charges apply to Iwi with mana whenua
- Strong support for charging international visitors
- Mixed views on charging New Zealanders

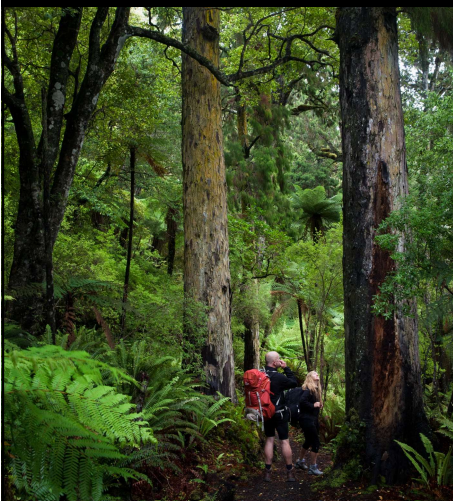
Note: we are still processing submissions from Iwi and hapū, so these viewpoints are based on what we heard during regional hui

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Recreation

Initial insights from key
stakeholder submissions on
'who' and 'where' to charge



Federated Mountain Clubs:

- opposes charging New Zealanders, because PCL belongs to all New Zealanders
- supports charging internationals, but only through the IVL – because it is a simple and efficient way of collecting revenue

The Aotearoa Climbing Access Trust (ACAT):

- opposes charging New Zealanders, because it would introduce a price barrier and create equity issues
- supports charging internationals, because they should fairly contribute to maintaining PCL, like New Zealanders already do via taxes

NZ Cycle Trails:

- supports charging everyone, because users should pay for costs associated with their visit
- supports charging New Zealanders less than internationals because they see free access as a birthright for New Zealanders
- see access charging as an opportunity to improve visitor experiences and fund the delivery of biodiversity objectives

NZ Cycle Trails agreed with the types of places DOC suggested could be effective for access charging (e.g. places facing unsustainable pressure from visitors).

FMC and ACAT said there was no clear rationale for the types of places DOC suggested, and that more clarity on the purpose of access charging is needed.

22

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Hunting & fishing

Initial insights from key stakeholder submissions on 'who' and 'where' to charge



- All three support charging for some specific services or facilities, but have concerns about charging for general access
- NZ Fish and Game and NZDA oppose charging in the backcountry or in areas used for hunting and/or fishing

New Zealand Fish and Game:

- oppose charging for access as it would deter people from PCL and it isn't directly linked to specific costs, unlike hut fees and carpark charges
- support charging for premier huts, and carpark and / or toilet charges in some places

New Zealand Game Animal Council:

- opposes charging everyone, because hunting on PCL should be free and also, hunters are unlikely to use DOC facilities
- any volunteers contributing to PCL, including hunters, should not be charged
- supports charging international hunters (no rationale given)
- supports charging New Zealanders for specific services

New Zealand Deerstalkers Association (NZDA):

- opposes charging New Zealanders, as free access is a cornerstone of New Zealand's outdoor heritage
- supports charging internationals to fund infrastructure needs on PCL without burdening locals
- club members should not have to pay to access their club hut or lodge

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ENGOS

Initial insights from key stakeholder submissions on 'who' and 'where' to charge



Forest and Bird:

- oppose charging New Zealanders, because they consider the ability to engage with nature is fundamental to our national and cultural identity
- tentatively support charging internationals, because of the risk of unintended consequences and complex implementation requirements

WWF NZ:

- expresses some support for charging everyone, as a way to increase revenue for core conservation work, but only if done sparingly and in a way that doesn't inequitably limit access to nature
- access charges must be part of a broader plan for long-term sustainable funding for biodiversity

Environmental Defence Society (EDS):

- supports charging everyone, because it could deliver the best conservation outcomes, e.g. by informing conservation management and destination planning
- supports charging New Zealanders less than internationals because New Zealanders already contribute through taxes
- discounts and exemptions should be used to avoid price becoming a barrier to low-income families
- All submitters highlighted the importance of upholding Te Tiriti, and working with Treaty partners.
- Both EDS and Forest and Bird supported charging only places with the most significant pressures of values (e.g. high-use places) because they have higher management costs

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Tourism / Concessionaires

Initial insights from key stakeholder submissions on 'who' and 'where' to charge



Tourism Industry Association:

- supports charging internationals, because it will improve visitor experiences and is standard practice overseas
- some support for charging New Zealanders (charging either equal to, or less than, internationals), in high-use places with high maintenance needs

Bus and Coach Association:

- support charging everyone, as a useful demand management tool
- adult New Zealanders should pay the same as internationals, because they already pay their fair share and it upholds our culture of hospitality

Trojan Holdings:

- supports charging internationals, to help manage demand and impact
- opposes charging New Zealanders (no rationale given)

RealNZ:

- supports charging everyone, to increase revenue for biodiversity and visitor experiences
- supports charging New Zealanders less than internationals (no rationale given)
- TIA, Trojan Holdings and RealNZ are concerned about double-charging internationals with the IVL – also, Trojan Holdings and RealNZ are concerned about double-charging concessionaires (concession fees)
- Bus and Coach Association and RealNZ submitted that more work is needed on where to charge
- Tourism Industry Association and Trojan Holdings supported access charging in a small number of locations
 - Trojan Holdings suggested pinch points like the Hooker Valley Track to manage demand

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Local councils

Initial insights from local council submissions on 'who' and 'where' to charge



Queenstown Lakes District Council

- supports charging internationals, because they should contribute to the costs created by their visit
- opposes charging New Zealanders, because New Zealanders should be encouraged to access the outdoors

Southland District Council

- supports charging internationals, consistent with 'user pays'
- opposes charging New Zealanders, because they already contribute through taxes and rates – also, they should be encouraged onto PCL
- access to DOC land for community infrastructure should be free
- supports charging at sites where high visitor numbers are impacting local communities and Council infrastructure

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Attachment B: Pros and cons of options and revenue estimates

Table A: High-level analysis of the pros and cons of each option

	Pros	Cons
Option 1 (Recommended)	- Highest net revenue (see table below). - Provides the Government with significant flexibility to enable more widespread use of charges and to try different approaches. - Potentially lower costs due to potential lower system complexity. - Enables a fairer balancing of contributions between user groups.	- Charging New Zealanders is contrary to the majority of submissions received. - Potentially creates additional price barriers for some New Zealanders accessing their natural, cultural and historic heritage. 9 (2) (g) (i)
Option 2	- High net revenue. - Provides the Government with significant flexibility to charge international visitors, and some flexibility to charge New Zealanders. - Enables a fairer balancing of contributions between user groups using tracks. - Leaves door open for using facility fees like carpark and track charges for New Zealanders. - Consistent with many submissions received. - Reduces barriers to basic access for some New Zealanders to their natural, cultural and historic heritage, including premier sites like Milford Sound and Aoraki.³ 9 (2) (g) (i) 9 (2) (g) (i)	- No access charging revenue from New Zealanders visiting places like Milford Sound and Aoraki (~350,000 a year, compared to 1.4 million international visitors). - Limits flexibility on where and how access charges are applied to New Zealanders. - Potentially higher implementation and administration costs due to potentially more complex charging system.
Option 3	- Moderate net revenue. - Provides the Government with significant flexibility to charge international visitors. - Leaves door open for using facility fees like carpark charges for New Zealanders. - Consistent with the majority of submissions received. 9 (2) (g) (i) - Minimises barriers to access for some New Zealanders to their natural, cultural and historic heritage, including premier sites like Milford Sound and Aoraki.	- No access charging revenue from New Zealanders visiting places like Cathedral Cove, Franz Josef, Tongariro Alpine Crossing, Milford Sound and Aoraki (~500,000 a year, compared to 2.6 million international visitors). - Does not enable fairer balancing of contributions between user groups. - Potentially higher implementation and administration costs due to potentially higher system complexity. - Greater risk of perceived overlap with the International Visitor Levy.

³ A survey from 2023 found that it was the biggest barrier to visiting Piopiotahi Milford Sound for 51 per cent of New Zealanders surveyed. Kantar. (May 2023). *Consumer insights to support development and implementation of the Milford Opportunities Master Plan*.

High-level net revenue estimates

Table B shows indicative sites under each option presented. Specific site proposals will be covered in detail in forthcoming **briefing 25-B-0126**.

Table B: Indicative sites for each option

Indicative sites		Option 1		Option 2		Option 3	
		NZ	Intl.	NZ	Intl.	NZ	Intl.
Area-based access	Piopiotahi Milford Sound	✓	✓		✓		✓
	Aoraki Mount Cook	✓	✓		✓		✓
Track charge	Mautohe Cathedral Cove	✓	✓	✓	✓		✓
	Tongariro Alpine Crossing	✓	✓	✓	✓		✓
	Kā Roimata o Hine Hukatere Franz Josef Glacier	✓	✓	✓	✓		✓

9 (2) (g) (i)

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

[REDACTED]

9 (2) (g) (i)

[REDACTED]

4 Milford Opportunities Project. (2021). *Milford Opportunities Project Masterplan: International Consumer Insights*. Pages 59-65. <https://www.milfordopportunities.nz/assets/Milford-Opportunities-Project-Masterplan-International-Consumer-1.pdf>



Briefing: Access charging – legislative design decisions

To	Minister of Conservation	Date submitted	23 April 2025
Action sought	Agree design parameters for access charging in conservation legislation.	Priority	High
Reference	25-B-0125	DocCM	DOC-10227907
Security Level	In Confidence		

Risk Assessment	Medium	Timeframe	28 April 2025
Attachments	Attachment A – Table of policy decisions to enable area-based access charges and track charges Attachment B: Summary of DOC's operational policy for facilities		

Contacts	
Name and position	Phone
Ewan Delany, Acting Deputy Director-General, Policy and Regulatory Services	9 (2) (a)
Siân Roguski, Director, Policy (Biodiversity, International and Funding)	9 (2) (a)
James Johnson, Manager, Budget and Funding Policy	9 (2) (a)

Executive summary – Whakarāpopoto ā kaiwhakahaere

1. On 10 April 2025, you indicated your preference to enable both area-based access charges and track charges for New Zealanders and international visitors (25-B-0124 refers). We now seek your decisions on the design of these new charges and how they will be reflected in conservation legislation. Attachment A sets out our advice and recommendations for these decisions.
2. Our key recommendations are:
 - area-based access charges are set up as a new levy on the basis that it is appropriate for visitors to public conservation land (PCL) to contribute money towards the Government's objective to improve conservation outcomes on PCL (a levy ensures that the revenue is earmarked for conservation).
 - regulations set the rate for charges, criteria for locations where they apply, and any discounts or exemptions
 - track charges are set up as a new facility fee (akin to Department of Conservation (DOC) huts and campgrounds) on the basis that it is appropriate for track users to contribute to the cost of DOC providing the experience (i.e. the track and associated facilities).
3. We consider using a levy alongside targeted fees – fees being used where costs are more identifiable – can best support your policy objectives for access charging, including creating net benefit for conservation, ensuring access for New Zealanders, and improving equity.
4. Your decisions will be reflected in a draft Cabinet paper that we will provide to you on 15 May for lodging on 30 June 2025. We will provide further advice to you in the coming weeks, including on initial recommended locations to introduce charges. Your decisions on recommendations in this subsequent advice will also be reflected in the draft Cabinet paper. Subject to Cabinet approval to progress with access charging, we will provide you with further advice on the details to be set out in regulations.

We recommend that you ... (Ngā tohutohu)

		Decision
a)	Decide on the charging design recommendations in Attachment A .	Yes / No
b)	Note that the decisions you make in this briefing will be reflected in a draft Cabinet paper on access charging.	<i>Noted</i>
c)	Note that we will advise you separately in early May 2025 on the potential locations for introducing area-based access charges and track charges; discounts and exemptions; and on implementation timing.	<i>Noted</i>
d)	Agree to forward this briefing to the Minister of Finance to test her views on your preferred approach to access charging ahead of circulating your draft Cabinet paper for Ministerial consultation.	Yes / No

9 (2) (a)

Date: 23/4/25

Date: / /

Ewan Delany
Acting Deputy Director-General,
Policy and Regulatory Services

Hon Tama Potaka
Minister of Conservation

Purpose – Te aronga

1. To seek your decisions on the design of area-based access charges and track charges and how they will be reflected in conservation legislation.

Background and context – Te horopaki

2. This is the second paper in a series of briefings seeking decisions on charging for access to some parts of public conservation land (PCL), following public consultation.
3. On 10 April 2025 you made decisions to enable area-based access charges and track charges for both international and New Zealand visitors (25-B-0124 refers). This will require changes to primary legislation as well as the development of secondary legislation (e.g. regulations).
4. This paper provides advice on key policy issues that will require decisions from Cabinet to inform the drafting of a conservation amendment bill to implement these new charges. If Cabinet agrees to progress this proposal, we will provide further advice on the details needed in regulations to support the new charging regime.
5. Table 1 (below) sets out the forward plan of the briefings leading to the development of your Cabinet paper. The timing of these papers aims to achieve your intent of passing legislative reforms within this parliamentary term. We recommend you provide a paper to Cabinet for its consideration and approval on 30 June 2025.

Table 1: Forward timeline of advice/decisions

Date	Briefings: focus of advice and decisions we will seek from you
9 April 2025	• Potential types of charges • Who these charges apply to (25-B-0124 refers)
22 April 2025	• Specific changes needed now to primary legislation for area-based access charges and track charges (this briefing)
Early May 2025	• Where to use charges (next briefing, 25-B-0126, will refer) • Discounts and exemptions • Implementation timing and options
15 May 2025	• Draft Cabinet paper • Draft summary of submissions
30 June 2025	• Cabinet considers proposal for access and track charges

We recommend area-based access charges are set up as a levy in primary legislation so that funding is ringfenced for conservation

6. We recommend that area-based access charges are implemented as a ‘levy’, as opposed to a ‘fee’, ‘royalty’ or ‘tax’¹. A levy is a specific charge on a group of individuals or organisations who benefit from a good, service, or regulation to help fund a particular government objective or function, such as conservation outcomes.
7. Levies are often used when it is difficult to identify the amount of the services that any one individual uses, and what the associated costs are. In this case we consider it appropriate for visitors to PCL to contribute money towards the Government’s objective to improve conservation outcomes on PCL.

¹ Fees apply to individuals, recognising the private benefits they directly receive from a service being provided and the costs to provide that service (e.g. staying in a hut). Royalties are typically paid by users to the owner of a ‘resource’, e.g. royalties paid to the Crown for minerals, and taxes are typically used to fund public services for the benefit of the wider population but are not ring-fenced for specific spending.

8. This is based on the benefits visitors receive from access, and because additional revenue will be used to maintain and improve these visitor experiences over time. A key benefit of levies is that revenue is ringfenced to their legislated purpose.
9. A levy needs a clear purpose statement that justifies what the charge is for and sets the scope of what the revenue can be spent on. We recommend that the purpose of the area-based access charge levy should be to *'generate revenue to maintain and enhance the visitor experience on land held under the Conservation Act 1987, National Parks Act 1980 or Reserves Act 1977'*.
10. This purpose would allow government to spend money on visitor infrastructure and services, as well as biodiversity work that contributes to visitors' experience on PCL. It also ensures that the levy will contribute to your priority of generating revenue from PCL to support conservation outcomes, and reflects a previous Cabinet decision to allocate revenue from access charges to conservation [CAB-24-MIN-0293].

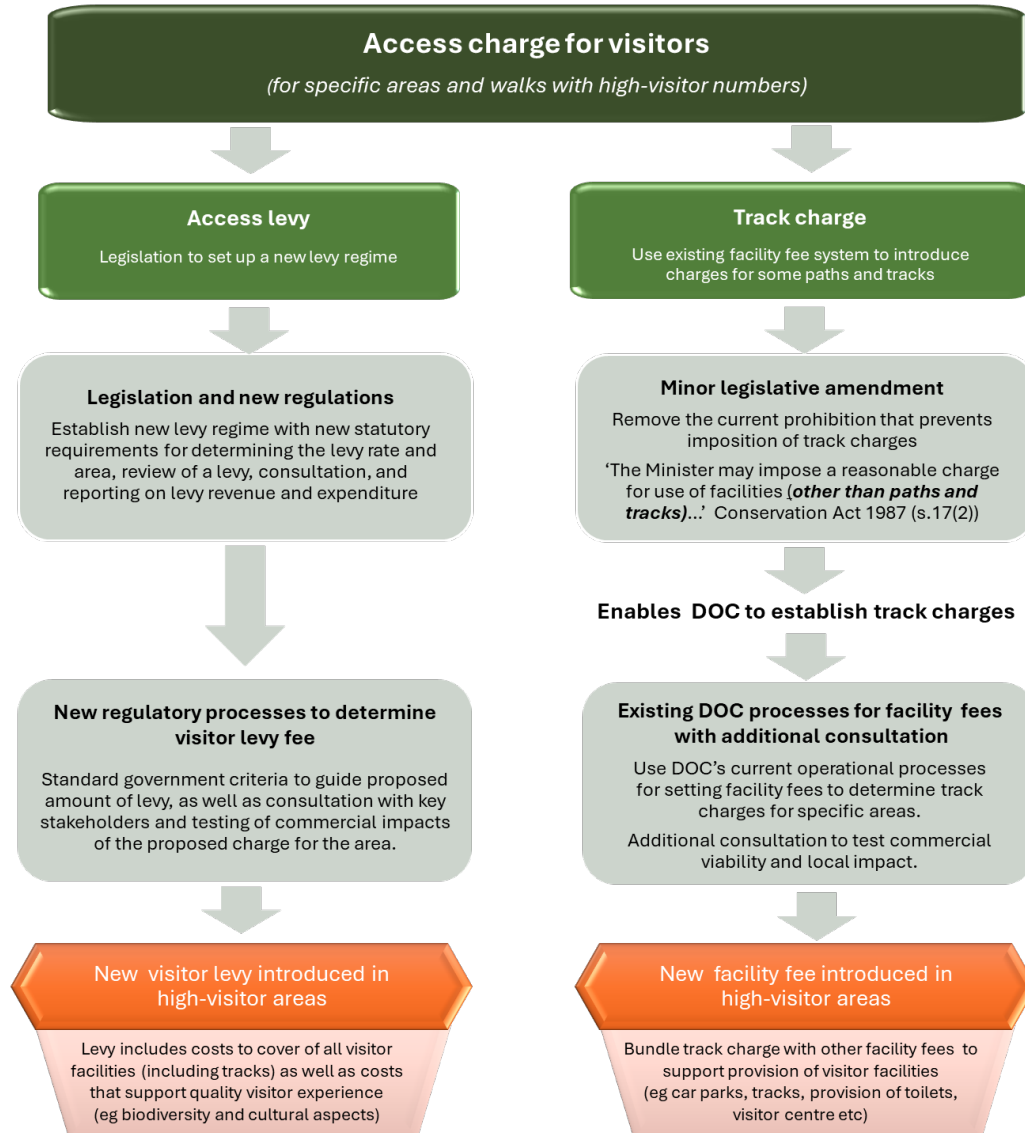
We recommend track charges are set up as a facility fee that focuses on recovering the costs to provide the facility

11. We recommend that conservation legislation is amended to enable the Government to charge for tracks and paths as a facility fee.
12. Fees are a charge on a specific person for the provision of a good or service. Fees are targeted, location-based, and reflect the private benefits that individuals receive from a service. They are often used in situations where costs to provide a service are clear, or easy to attribute to users.
13. Unlike a levy, the key focus of a fee is to recover the costs of an activity (either partially or fully). We already use fees to charge for the use of other facilities, such as campsites and huts.
14. Setting up track charges as fees would enable us to use existing facilities management tools (including existing pricing policies and allocation methods) and to more equitably distribute the cost of services across user groups and between users and taxpayers. Additional revenue from track fees would support us to improve and maintain facilities and contribute to wider conservation outcomes.

There are significant policy decisions to make on area-based access charges and track charges

15. Generally, significant policy decisions should be reflected in primary legislation. For area-based access charges and track charging this includes:
 - setting up the charges as a levy and a fee
 - what the charge rate will be based on
 - who is liable to pay the charges
 - decision-making on the expenditure of the charges
 - who collects the charges
 - consultation requirements
 - review requirements
 - reporting requirements.
16. We recommend empowering provisions are included in primary legislation to authorise secondary legislation such as regulations. We recommend regulations then set out the detailed requirements for how charges are to be implemented and contain the 'technical' details of the charging policy that will require frequent updating, this includes:

- *For area-based access charges*, we recommend that regulations specify the location for each charge, the specific amount of the charge, and any exemptions, discounts, differential pricing and waivers for specific groups.
- *For track charges*, you have a choice about what sits in regulations to align with our approach for the levy, and what is delegated to DOC to determine, in consultation with the Minister of Conservation. The latter would be based on DOC's existing facilities charging framework.



17. We recommend that criteria for where track charges can be used and specific locations are put into regulations, but that other aspects like the amount of specific charges, and exemptions, discounts, differential pricing and waivers use existing operational policy (see Attachment B for details), which would not sit in regulations.
18. It is important that track charges align as much as possible with our existing policies for facility charging, given their similarities and the need for a simple charging framework that is easy for users to understand. However, outlining criteria and locations for track charges in regulations will provide additional reassurance to the public and stakeholders that track charges will only be limited to specified areas.
19. Cabinet would make decisions on regulations based on the recommendations from the Minister of Conservation.
20. **Attachment A** provides advice and sets out the decisions you need to make on the policy issues listed above to inform the drafting of primary legislation.

Risk assessment – Aronga tūraru

Risks associated with future fee changes and baseline funding swaps

21. Cabinet previously agreed that revenue from access charges would be used for conservation [CAB-24-MIN-0293]. Many submitters are concerned that revenue from access charges will not be treated as additional revenue for conservation, but would effectively be used to generate wider Crown savings.
22. Social license for new charges is much more likely to be built and maintained if new funding is used for conservation purposes and seen to be additional to existing conservation funding.
23. Recommendations in this paper to put in place transparent fee and charge setting criteria, consultation and review mechanisms, and public reporting will also help maintain stakeholder confidence in a future charging regime.

Treaty principles (section 4) – Ngā mātāpono Tiriti (section 4)

24. Briefing 25-B-0124 outlined DOC's initial analysis of Treaty of Waitangi implications for introducing access charging.
25. Further, specific considerations around the allocation of revenue, and decisions around how revenue is spent are outlined in more detail in the table in Attachment A.

Consultation – Kōrero whakawhiti

26. DOC consulted the Treasury on the development of this briefing and key feedback included:
 - To use a combination of a levy and fees to better meet the policy objectives. Treasury outlined that levies tend to be more fungible and can support broad outcomes, where fees are more specific, location based and linked to costs.
 - That legislation and regulation making powers be broad and simple. This would ensure that Ministers can make calls regarding resource allocation and reduce consultation complexity.
27. DOC agrees with the Treasury's suggestions and have incorporated them into our advice and recommendations.

Next steps – Ngā tāwhaitanga

28. DOC will use your decisions to inform further advice and the drafting of your Cabinet paper, which we will provide to you on 15 May 2025.
29. We recommend that you discuss this paper with the Minister of Finance to test her views ahead of circulating your Cabinet paper for Ministerial consultation.

ENDS

Attachment A – Table of recommendations on policy decisions to enable area-based access charges and track charges

Proposal	Options	Decision	Analysis and advice
Area-Based Access Charges			
Setting up area-based access charges as a levy	Agree area-based access charges be set up as a new levy in primary legislation. Agree the purpose of the levy is to generate revenue to maintain and enhance the visitor experience on land held under the Conservation Act 1987, National Parks Act 1980 or Reserves Act 1977.	Yes / No Yes / No	We recommend that access charges are implemented as a new levy so that funding is earmarked for conservation outcomes We recommend that area-based access charges are implemented as a new 'levy', as opposed to a 'fee', 'royalty' or 'tax'. A levy is a specific charge on a <u>group of individuals or organisations</u> who benefit from a good, service, or regulation to help fund a particular government objective or function. The purpose of the levy should enable DOC to spend money on visitor infrastructure and services, as well as biodiversity A levy needs a clear purpose statement that justifies what the charge is for and to set the scope of what the revenue can be spent on. We recommend that the purpose of the area-based access charge levy should be to generate revenue to maintain and enhance the visitor experience on land held under the Conservation Act 1987, National Parks Act 1980 or Reserves Act 1977. This broad purpose would enable investment in visitor infrastructure and services, as well as biodiversity work that contribute to visitors' experience on PCL. Note that final wording will be drafted by PCO.
What the levy rate will be based on	Agree the basis for the levy be set in primary legislation. Agree the levy rate will be based on the following principles: <i>rates will be reasonable, given: value, demand, costs to</i>	Yes / No Yes / No	Primary legislation should set out how the levy is determined Legislation Design and Advisory Committee guidelines outline that legislation must set out how the levy should be determined (i.e. how it is calculated) and that there must be a proper relation between the levy amount charged and the particular objective or function concerned. We recommend that the levy rate is determined based on a set of guiding principles

Proposal	Options	Decision	Analysis and advice
	provide current experiences and their ongoing investment, and international comparisons <i>rates will be set at a level that is not a significant barrier to visitors recreating in protected areas</i> <i>rates will be established following engagement with local communities, key stakeholders and Iwi.</i> 5. Note rates will be set in regulations.	Noted	Feedback from public consultation outlined that access charges need to consider the willingness to pay for experiences, the costs to maintain experiences and that price shouldn't be a barrier for entry to conservation lands (in particular for New Zealanders). 9 (2) (g) (i) [Redacted] [Redacted] [Redacted] [Redacted] [Redacted] [Redacted] We recommend that specific rates be set out in regulations and be able to differ by area depending on local circumstances. This requires an empowering provision in the primary legislation that is discussed in more detail below.
Who is liable to pay the levy	6. Agree who pays the levy is outlined in primary legislation.	Yes / No	This recommendation means that primary legislation will outline which groups of people are required to pay the area-based access charges. If Cabinet agrees to your recommendation (25-B-0124 refers), this will apply to international visitors and New Zealand residents. While the legislation will provide for a levy on all visitors, exceptions can be provided for in regulations for each area in which the levy rate is set (discussed below in Recommendation 12).

Proposal	Options	Decision	Analysis and advice
Decision-making on the expenditure of the levy	7. Agree the Minister of Conservation sets high-level direction for expenditure from the levy. 8. Agree the Director-General will have the authority to make day-to-day investment decisions in line with the purpose of the levy and the Minister's priorities.	Yes / No Yes / No	We recommend that the Minister of Conservation sets the priorities for expenditure of levy revenue, while the Director-General approves specific project expenditure We recommend that the Minister of Conservation sets the priorities for levy revenue. This could be through an investment plan (as with the IVL) or a directive to DOC. The Director-General would be responsible for making the day-to-day decisions on spending the revenue in line with the levy's purpose and functions of the Department, guided by the Minister's direction on priorities, and by the proposed national conservation policy statement. This would strike a balance between enabling DOC to manage timely disbursements to address local area issues as these are identified, while ensuring major spending decisions align with ministerial priorities. It is common for the spending of levies to be managed by Departments, rather than Ministers.
Who collects the levy	9. Agree primary legislation will enable the Department of Conservation to collect the revenue on behalf of the Crown.	Yes / No	This is a procedural requirement that ensures DOC can collect revenue on behalf of the Crown.
Empowering provisions that authorise regulations prescribing how the levy is implemented	10. Agree primary legislation create regulation making powers to cover the following implementation details: • where the charges will apply • what the final charge is for each area	Yes / No	We recommend that secondary legislation provide more detailed guidance on how to implement the levy We recommend that the following technical details to impose and collect a visitor levy be set out in secondary legislation, which requires empowering provisions in the primary legislation. • Where the charges will apply - This will outline the criteria behind selecting areas for charging, as well as the specific area that an area-based access charge would apply to (e.g. Milford corridor). This limits the

Proposal	Options	Decision	Analysis and advice
	exemptions, discounts, differential pricing, and waivers for specific groups. 11. Note regulations already enable the prescribing of infringement offences but some minor adjustments might be needed to ensure they will also apply to access charging.	Noted	levy to certain eligible locations. Detail on this will be in the next access charging briefing (25-B-0126 refers). What the final charge is for each area - What the levy charge will be for each area-based access charge. Exemptions, discounts, differential pricing, and waivers for specific groups - This would enable regulations to set out scenarios where certain groups of people might pay less, or wouldn't pay at all, or when certain times of the year would not pay a levy. For example, regulations may outline that children will pay half the price of adult visitors. Cabinet may wish to agree in principle to exemptions before we have developed the regulations. We will provide further advice on this in the next access charging briefing (25-B-0126 refers). We already have a compliance model that can be utilised for access charging Compliance with any area-based access charging system will be important to ensure that levy collection rates are high, confidence is maintained, and the system is functioning correctly. We have an existing infringement notice system, but new infringement offences will need to be created to make non-payment of a levy or fee an infringement offence. We will provide further advice on what specific infringement offences are needed in legislation.
Consultation requirements	12. Agree primary legislation will require consultation with interested parties when setting a levy, or proposing significant changes to a levy for an area.	Yes / No	New area-based access charges will have impacts on local areas and for this reason we recommend that consultation with interested parties be undertaken. This would include iwi, local communities, and interested stakeholders (e.g. local tourism providers). This is common across regulatory regimes. Consultation would allow us to interrogate implementation considerations, the rate being charged, and explore some key priorities for investment in the area. This targeted approach to consultation will provide transparency and accountability whenever an access charge is introduced or major amendments are proposed.

Proposal	Options	Decision	Analysis and advice
Charging policy review requirements	13. Agree primary legislation requires the Department to consider a review of levy-setting regulations every five years to ensure rates, area boundaries for the levy and any exemptions remain relevant. 14. Agree primary legislation enables minor, technical and CPI adjustments of charges or boundaries to occur without formal review and consultation.	Yes / No Yes / No	The levy amount, areas covered by the levy and any exemptions should be considered for review at least every five years (noting that this would not preclude the Director-General reviewing a levy at any time, nor does a full review need to be completed). This will ensure the levy is working effectively and the Director-General has considered the coverage and the appropriateness of the levy rate. The primary legislation should allow for minor or technical changes to levy rates or area without a formal review or consultation (for example, minor changes to the levy rate to reflect Consumer Price Index (CPI) adjustments).
Revenue reporting requirements	15. Agree primary legislation require the Director-General to publicly report on how much revenue was collected each year and what it was spent on.	Yes / No	A requirement should be put into primary legislation that the Director-General must publicly report on how much revenue was collected by the levy that year, and how it was applied. This will maintain transparency and social licence for the levy.
Track Charges			
Setting up track charges as a new facility-type fee	16. Agree track charges are set up as a fee on all types of PCL through an adjustment of existing primary legislation.	Yes / No	We recommend amending conservation legislation to ensure that paths and tracks can now be charged for as a fee on all types of PCL. Fees are a charge on a specific person for the provision of a good or service. Fees are targeted, location-based, and reflect private benefits that individuals receive from a service. They are often used in situations where costs to provide a service are clear or easy to attribute to users. In this instance, the fee would be for the use of a path or track, as well as their associated infrastructure, such as toilets, shelters, and signage. Taking this

Proposal	Options	Decision	Analysis and advice
	recreating in protected areas <i>fees will be established following engagement with local communities, key stakeholders groups and Iwi.</i>		We recommend that rates for track charges are developed using DOC's existing operational policy for facility fees. This would enable us to take a consistent approach to development and pricing of facility experiences. The Minister of Conservation is the final decision maker for fees. Alternatively, the rate for track charges could be based on the same principles we have proposed for the levy Pricing for facilities must be 'reasonable' and there is high crossover between these measures and the new principles for developing levy pricing. For example, both must look at the 'value' of experiences to the users, as well as the costs to DOC to provide them. We consider that ensuring consistency in facility pricing is more important than consistency between track charges and area-based access charges. Setting principles into primary legislation would also mean that DOC would not be able to easily update how it does pricing for track charges if a different approach is needed. For other facilities, we can update and amend our pricing policy as needed with changing contexts. In addition, using different pricing approaches is appropriate as there is a difference between charging for access to a broad area and a wide set of experiences via a levy, versus a specific and targeted facility charge for individuals for one particular experience. Managing them in the same way may raise questions about what the difference is between a track charge and an access charge, and whether they are both in fact charges for 'access'.
Who is liable to pay the fee	18. Agree who pays track charges be set out in primary legislation.	Yes / No	If Cabinet agrees to your recommendation (25-B-0124 refers), this would enable their application to international visitors and New Zealand residents, and aligns with our existing facility charging policy.

Proposal	Options	Decision	Analysis and advice
Decision-making on the expenditure of the fee revenue	19. Agree the Director-General have authority to make day-to-day investment decisions on how the revenue from the fee is spent.	Yes / No	We recommend that existing operational policy is used to allocate track fee revenue We have existing operational policies in place for allocating revenue that is generated from DOC's facilities. Revenue is collected into a 'national pot' then allocated to the regions based on need and priorities, with day-to-day decisions on spend being made by DOC. Priorities for revenue spending are often directed by the government of the day, but there is no formal role for the Minister of Conservation in allocating facility revenue. Fees are designed to cover DOC's cost to provide the facility (and fee revenue is not available for other DOC priorities such as improving biodiversity or increased predator management).
Who collects the fee	20. Agree primary legislation will enable the Department of Conservation to collect the revenue on behalf of the Crown.	Yes / No	This is a procedural requirement that ensures that DOC can collect revenue on behalf of the Crown.
Empowering provisions that authorise secondary legislation prescribing how the fee is implemented	21. A) Agree to utilise existing operational policy without new regulations. OR B) Agree to utilise existing operational policy with some empowering provisions to make regulations. (Recommended) OR C) Agree to align the approach with area-based access charges.	Yes / No Yes / No Yes / No	We recommend track charges draw on DOC's existing operational policies for the use of facilities fees (Attachment B), but with some extra empowering provisions to authorise regulations (option B) We recommend creating regulations for track fees that set out the criteria for where track charges could be applied and the tracks charges currently apply to. This will ensure that track charges are only used in specific locations supported by transparent policy parameters. Specific detail on the criteria will be in the next access charging briefing (25-B-0126 refers). Benefits of this approach include that fees will be relatively easy to implement and update, and it will provide assurance that track charges won't be widespread.

Proposal	Options	Decision	Analysis and advice
			Drawbacks include that there will be limited oversight by Cabinet, and pricing will use DOC's existing pricing policy and the 'reasonable' test which is not as transparent to the public. DOC could utilise existing operational policy for implementing track fees This would mean that we set fees using existing pricing policy, that locations where track fees are used would be limited to our recommendations and agreement from the Minister of Conservation without Cabinet oversight, and any exemptions/discounts would align with existing facility policies. Benefits of this approach include that it would be the simplest to implement and maintains existing systems, and it would be flexible and easy to update charges. Drawbacks include there would be limited oversight by Cabinet, there would be few limitations on locations for track fees, and pricing would only be limited by 'reasonable' test, which isn't as transparent to the public. The third option is to align the approach with that of area-based access charges and use regulations to set out where charges apply, fee rates, and any exemption and discount policies This regulatory approach for prescribing how track charges are implemented would not align with how DOC manages existing facility charges. Benefits of this approach include providing more oversight by Cabinet, providing assurance that charges won't be widespread, and that charges will clearly be set out in regulations and align with how the levy is managed. Drawbacks include that it will require changes to existing systems to implement, it won't align with other facility fees, it will increase implementation timeframes and be harder to update regularly, and risks extending existing operationally-based facility pricing into a new regulatory regime.
Consultation requirements	22. A) Agree changes to track charges rely on existing operational policy, which	Yes / No	New track charges will have impacts on local areas and for this reason we recommend that consultation with interested parties is undertaken. This would include iwi, local communities, and interested stakeholders (for example, local

Proposal	Options	Decision	Analysis and advice
	currently involves targeted consultation. OR B) Agree primary legislation requires consultation with interested parties on proposals to introduce to track charges, or to make significant changes to any existing track facility charges. (Recommended)	Yes / No	tourism providers). DOC is not currently required by primary legislation to consult on changes to fees, but in practice does undertake targeted consultation. Adding a consultation requirement will ensure that DOC continues to undertake good practice on engagement, and will be a key factor in providing transparency and accountability.
Charging policy review requirements	23. A) Agree track charges will rely on existing operational policy, which currently involves reviews every three years, but is not required by legislation. OR B) Agree primary legislation will require DOC to consider a review of track charges every five years to ensure rates and locations remain relevant. (Recommended)	Yes / No Yes / No	The rates and locations for track charges should be considered for review at least every five years. This would ensure that the charges are working as they should, and that pricing can be regularly updated to ensure it is at an appropriate level. Depending on the level of change, further consultation may need to be undertaken. DOC currently reviews facility pricing three-yearly, but this is not required by primary legislation. Requiring this would be an additional factor in providing transparency and accountability.
Revenue reporting requirements	24. Note track charge revenue and expenditure will be reported in the same manner as other existing facility fees in the Department's annual report and financial statements.	Noted	Reporting requirements for the collection of track charges will be covered under the existing financial reporting requirements for other facility charges (which goes into Crown revenue account), and is publicly notified in DOC's annual report. DOC does not propose to introduce a separate requirement for public reporting of track charge revenue and expenditure.

Attachment B: Summary of DOC's operational policy for facilities

Subject	Existing operational policy for facility charges
What type of charge is it?	Fee – on specific individuals for the use of a facility.
Where to charge	Locations limited to those with facilities (excluding paths and tracks).
What the charge is for	Charging for the use of a specific facility (e.g. campsite, hut).
Who is eligible to pay	Internationals and New Zealanders.
Specific rate	Rate set using DOC's internal pricing policy, not based on cost recovery. We consider things such as: • our legislative powers (and their limits) to charge • we are a government agency with broad conservation, recreational and tourism policy drivers • our goods and services are often in a monopoly position • the array of commercial (market) and non-market pricing techniques available • the role user charges can play in influencing use and demand for facilities • the views of our partners, stakeholders and visitors (customers) • the cost of delivery of the experience. Minister sets final price based on recommendations from DOC. Not in secondary legislation (bylaws or regulations).
Exemptions, discounts, differential pricing, and waivers	Outlined by internal discount and differential pricing policy. Differs by product set. Includes: discounts for children (5–17 years) for hut tickets, differential pricing for international visitors staying at Great Walk huts (pay 50% more than New Zealanders).
How to allocate revenue	Revenue is allocated into a national pot as Crown revenue. DOC makes day-to-day decisions on how it is spent, based on need and national priorities.
Consultation	No consultation requirement in legislation. For any new charges, consultation is undertaken. Consultation is no longer undertaken for price updates.
Reporting	Reporting through DOC's annual reports including: • huts, tracks and structures managed to standard • revenue from huts, campsites, Great Walks etc.
Review	Pricing reviewed every three years. Limited consultation on any changes to charges and not required by legislation.



Briefing: Access charging - initial locations for investigation

To	Minister of Conservation	Date submitted	7 May 2025
Action sought	Agree to location selection criteria and the initial locations to announce for investigation for introducing access charging	Priority	High
Reference	25-B-0126	DocCM	DOC-10294752
Security Level	In Confidence		

Risk Assessment	Medium	Timeframe	19 May 2025
Attachments	n/a		

Contacts	
Name and position	Phone
Ruth Isaac, Deputy Director-General, Policy and Regulatory Services	9 (2) (a)
James Johnson, Budget and Funding Policy Manager	9 (2) (a)

Executive summary – Whakarāpopoto ā kaiwhakahaere

1. On 10 April 2025, you indicated your preference to enable both area-based access charges and track charges for New Zealanders and international visitors (25-B-0124 refers).
2. Your discussion document outlined that access charging would likely not be suitable or appropriate for all areas of public conservation land and public feedback supported this. We recommend that announcement of the introduction of charging go hand-in-hand with announcement of the locations the government intends to progress charges.
3. Identifying and selecting locations for charging should balance both:
 - (i) putting clear parameters and limitations on the number and type of locations where access charging can be introduced, to provide certainty and assurance to the public
 - (ii) providing significant opportunity to generate revenue for conservation and focusing investment into high priority conservation outcomes, to deliver on the government's objectives.
4. With this in mind, we recommend the following criteria for location identification (noting that these also align with feedback we received through public consultation):
 - (i) sites that are iconic and popular, with high visitor numbers
 - (ii) sites with a high proportion of international visitors
 - (iii) sites with high infrastructure and facility costs
5. Based on these criteria, we recommend the Government progress further investigation and consultation on the following locations, including cost-benefit analysis:
 - area-based charges at **Aoraki / Mt Cook** and **Piopiotahi / Milford Sound**
 - track charges at **Mautohe / Cathedral Cove** and **Tongariro Alpine Crossing**.
6. 9 (2) (g) (i) [REDACTED]
7. While we have a longer list of other locations with potential, we recommend starting with a smaller number - focusing on those that have the highest revenue potential and where (in some places) existing work has been underway that can be leveraged. We consider this will make it easier and quicker to implement and enable us to evaluate the effectiveness of the scheme and build social license before introducing charges elsewhere.
8. Subject to Cabinet agreement, we will do further investigation of the four sites (including initial cost-benefit analysis), followed by consultation. In terms of process, we (on your behalf) would undertake targeted consultation at the locations, including with local communities, Iwi and key stakeholders.
9. Your decisions in this paper will be reflected in a draft Cabinet paper that we will provide to you on 22 May 2025 for lodging 19 June 2025. Subject to Cabinet approval to progress with access charging and consultation on these sites, we will provide you with further advice on implementation timeframes, which depend on the scope of the new charges agreed by Cabinet.

We recommend that you ... (Ngā tohutohu)

		Decision
a)	Agree to the following criteria for identifying and selecting locations for access charging: • sites that are iconic and popular, with high visitor numbers • sites with a high proportion of international visitors • sites with high infrastructure and facility costs.	Yes / No
b)	Note that starting with a small number of locations will make it quicker and easier to implement, while still generating significant revenue potential.	Noted
c)	Agree to investigate area-based charges at: (i) Piopiotahi / Milford Sound (ii) Aoraki / Mt Cook.	Yes / No Yes / No
d)	Agree to investigate track charges at: (i) Mautohe Cathedral Cove (ii) Tongariro Alpine Crossing.	Yes / No Yes / No
e)	Agree that we undertake targeted consultation on charging at these sites, subject to Cabinet agreement, with local communities, Iwi and key stakeholders.	Yes / No
f)	Note that your Cabinet paper will include a longer list of potential sites to explore if the initial sites prove successful.	Noted
g)	Note we will provide you with further detailed advice on implementation timeframes after Cabinet decisions (given the interdependence of Cabinet decisions on type of charges and location with detailed implementation planning).	Noted
h)	Note that the decisions you make in this briefing will be reflected in a draft Cabinet paper on access charging to be provided to you by 22 May 2025.	Noted

9 (2) (a)

Date: 07/05/2025

Ruth Isaac
Deputy Director-General,
Policy and Regulatory Services

Date: / /

Hon Tama Potaka
Minister of Conservation

Purpose – Te aronga

1. To seek your agreement to criteria for selecting locations for access charging, and initial locations to consult on for inclusion in your June 2025 Cabinet paper.

Background and context – Te horopaki

2. This is the third paper in a series of briefings seeking your decisions on how to take forward your proposal to charge for access to some parts of public conservation land (**PCL**), following public consultation (25-B-0124 and 25-B-0125 refer).
3. This is part of your Revenue Action Plan. We will continue to work on making the most of our existing revenue tools, such as hut fees and concessions revenue.
4. Our timeline aims to achieve your intent of passing legislative reforms within this parliamentary term. We recommend you deliver a paper to Cabinet on 30 June 2025. **Table 1** sets out the forward plan leading up to Cabinet decisions.

Table 1: Timeline leading up to Cabinet

Date	Timeline to Cabinet
7 May 2025	• Briefing - Where to use charges
15 May 2025	• Briefing – Discounts, exemptions, Treaty considerations, third party charging
22 May 2025	• Draft Cabinet paper • Draft summary of submissions
3 – 16 June 2025	• Ministerial Consultation on Cabinet Paper
25 June 2025	• Cabinet Economic Policy Committee
30 June 2025	• Cabinet

5. We will provide a final briefing covering exemptions and discounts, Treaty of Waitangi considerations, and third party charging for access by mid-May 2025 (25-B-0188 refers).

The public will have a strong interest in the locations for access charging

6. The discussion document highlighted that access charges would not be appropriate on all PCL. Feedback from public consultation agreed with this and suggested access charges should be focused on places with high numbers of international visitors, places where visitors are creating large costs through facilities or infrastructure, and places facing unsustainable pressures. Submitters were opposed to introducing charges for backcountry areas and in areas commonly used for hunting or fishing.
7. We recommend criteria are used to identify and select the locations for access charging and these criteria be set in regulations. This will limit where access charges can be introduced, assuring stakeholders and the public that charges won't be applied everywhere on PCL.
8. We recommend that you agree to the following criteria for selecting the locations for access charging:
 - sites that are iconic and popular, with high visitor numbers
 - sites with a high proportion of international visitors

- sites with high infrastructure and facility costs.
9. These criteria align with feedback received during the public consultation. The focus on sites with high visitor numbers balances your objective of increasing revenue with concerns raised during consultation about maintaining access to PCL.
 10. We will do further work to test and refine these criteria including defining what 'high' means. We will then seek yours and Cabinet's final approval of the criteria, before they are included in regulations.
 11. If Cabinet agrees to your recommendation, the introduction of new area-based charges will also be subject to consultation which will give the opportunity for interested parties to raise any concerns around new sites being added. We would also consult on new track charges (25-B-0125 refers).

We recommend beginning by investigating access charging, including completing cost-benefit analysis, at a limited number of locations

12. We recommend you progress access charging by investigating the locations proposed below, including completing cost-benefit analysis. Further sites could be added in the future if they meet the criteria, but beginning with these sites will allow us to assess the effectiveness of the scheme.
13. If these locations represent a good return on investment for the Crown, we recommend that you then undertake targeted consultation on implementation at the locations, including on any issues that might inform the rate of any charge or discounts/exemptions and other local considerations. This could include consulting local communities, Iwi and key stakeholders.
14. We will provide you with further advice by August 2025 on the scope of both the investigation and consultation, and timeframes, following Cabinet decision on whether to progress the scheme.
15. If Cabinet agrees, you could announce the locations for investigation as well at the commitment to consult, alongside the decision to progress with enabling access charging in legislation.
16. This, alongside the criteria for selecting sites, will help to communicate the scope of the proposal to the public and stakeholders.

We recommend you investigate access charging at four locations, which have significant revenue potential

17. We have identified four locations based on the criteria set out above that could be suitable for introducing access charging.
18. The proposed locations are listed in **Table 2** below. The discussion document listed these locations as potential places for access charging.

Table 2 - Proposed sites

Site	Annual visitor numbers	Percentage of internationals
Area based charges		
Aoraki/Mt Cook	1.0 million	88%
Milford Sound/Piopiotahi	1.1 million	90%
Track charges		
Mautohe Cathedral Cove	0.13 million	75%
Tongariro Alpine Crossing	0.10 million	80%

19. 9 (2) (g) (i) [REDACTED] These estimates provide an indication of the scale of revenue potential, with actual revenue being dependent on choices around price, discounts and exemptions, and implementation costs.
20. Tongariro Alpine Crossing, Milford Sound and Aoraki/Mt Cook were the most common suggested sites raised through the public consultation.

We recommend investigating area-based charges at Milford Sound and Aoraki due to their iconic status and high visitor numbers

21. Piopiotahi / Milford Sound and Aoraki / Mt Cook are two of New Zealand's most iconic visitor sites.
22. Milford has approximately 1.1 million visitors a year with around 90 per cent being internationals. We estimate the cost to maintain our current visitor experiences to standard in Fiordland National Park is around \$6.8 million per annum with an additional \$1.3 million for depreciation. Biodiversity expenditure is estimated at \$1.6 million per annum.² The Milford Opportunities Project identified significant additional investments needed to improve the visitor experience.
23. Aoraki has around 1 million visitors a year, with around 88 per cent being international. We estimate the cost to maintain our current visitor experiences in Aoraki / Mt Cook National Park to standard to be \$0.64 million a year with an additional \$0.52 million for depreciation. Biodiversity expenditure is estimated at \$0.29 million per annum. Revenue raised would allow these costs to be met, plus additional investments made to improve the visitor experience and support thriving biodiversity.
24. Both sites would be well aligned with an area-based charge because there are a range of facilities and tracks which visitors use when going to these destinations.
25. Research undertaken for the Milford Opportunities Project showed 79 per cent of international visitors supported an access charge, with willingness to pay in the range of \$90-\$110. Visitors already expect to pay for UNESCO World Heritage Sites and Nationals Parks. Less than 1 per cent would consider it a deterrence to visiting New Zealand.
26. There were strong expectations that funds be invested into conservation at place and strong expectations to manage numbers through a booking system.

We recommend investigating track charges at two of our most popular short walks and day hikes

27. We recommend investigating track charges at Mautohe Cathedral Cove and the Tongariro Alpine Crossing.
28. These tracks have some of our highest visitor numbers and international visitors make up a high proportion of visitors. Prior to COVID Cathedral Cove was attracting over 250 thousand visitors a year, while the Tongariro Alpine Crossing consistently attracts over 100 thousand visitors a year.
29. The tracks have relatively high maintenance costs. As some of our most popular tracks, they are maintained to a higher standard to enable use by visitors with a range of ability and fitness levels.

¹ 9 (2) (g) (i) [REDACTED]

² Biodiversity estimates are based on work done by Regional Operations and does not include nationally managed programmes such as National Predator Control Programme

30. We estimate comprehensive management costs for Cathedral Cove to be \$0.79 million per annum and recently invested \$5 million of International Visitor Conservation and Tourism Levy (**IVL**) funding on repairs following cyclone Gabrielle. Costs for the Tongariro Alpine Crossing are estimated at \$0.21 million per annum, with a further \$1-2 million of capital investment required in coming years.

31. Our advice is to target a small number of our most popular sites. This will be:
- easier and quicker to implement
 - enable us to evaluate the effectiveness of the scheme
 - build social license before introducing charges elsewhere.
32. If the initial locations prove successful, more could be added late and you also raised ideas of other locations. 9 (2) (f) (iv) & 9 (2) (g) (i)
- | | |
|--------------|--------------|
| ■ [REDACTED] | ■ [REDACTED] |
| ■ [REDACTED] | ■ [REDACTED] |
| ■ [REDACTED] | ■ [REDACTED] |
| ■ [REDACTED] | ■ [REDACTED] |
33. The Cabinet paper will list these locations, and they could also be announced to signal where we will look to expand if the initial locations prove successful.

34. We are trialling car park charges in Aoraki/Mt Cook in the summer of 2025/26. As part of the exploration process, we will provide advice about whether to include parking along with an access charge, or to have separate charges. If the charges are kept separate, we will investigate a streamlined payment system which allows both to be paid at the same time.
35. We will also consider the interaction between access charges and concession fees e.g. per person concession charges on buses. We will look to streamline charges and ensure we do not double charge.

36. As visitor numbers continue to increase, having a range of visitor management tools is crucial to maintaining the quality of our visitor experiences, ensuring visitor safety, and protecting conservation values. Visitors' expectations for a quality experience are also likely to be raised if they are required to pay an access charge.
37. We will be doing further work to investigate the most appropriate mix of visitor management tools for any site we introduce charges at.
38. For example, this may include limiting the number of people who can pay to access a site at a given time e.g. through a booking system. While we have not previously imposed limits on numbers of the general public who can access areas of PCL like this, limits have been imposed on numbers accessing sites through concessionaires, and we limit numbers through our hut booking system.
39. The powers to restrict access for visitor management purposes already exist in conservation legislation and we will investigate using them as part of the exploration of the specific sites.
40. Currently the use of these powers must be in accordance with, or not inconsistent with, the relevant general policy, conservation strategy, and management plan. Your

proposed changes to modernise conservation land management will simplify the system and ensure any limits are set appropriately and will impact all users equally.

Risk assessment – Aronga tūraru

41. 9 (2) (g) (i)

Treaty principles (section 4) – Ngā mātaōpono Tiriti (section 4)

42. We will engage with Iwi at each proposed site to seek their input on the proposed charges. Briefing 25-B-0188 will provide more Treaty of Waitangi analysis.

Consultation – Kōrero whakawhiti

43. We have not engaged with other agencies while drafting this paper but will carry out agency consultation on the draft Cabinet paper.

Financial implications – Te hīraunga pūtea

44. Resourcing is required to explore these sites. This will require upfront investment before the sites begin to generate revenue. Your Cabinet paper will need to be clear on funding sources for implementation. We are considering IVL funding as an option and will provide further advice on this for inclusion in the paper.

Legal implications – Te hīraunga a ture

45. Introducing access charges is dependent on legislative changes as described in 25-B-0124 and 25-B-0125.

Next steps – Ngā tāwhaitanga

46. Following your agreement, we will include the proposed sites in your draft Cabinet paper.
47. We will provide you with the draft Cabinet paper by 22 May 2025, with the intention of taking the paper to the Cabinet Economic Policy Committee on the 25 June 2025.
48. We will begin the work on site implementation design and consultation following Cabinet agreement.

ENDS



Briefing: Access charging Cabinet paper

To	Minister of Conservation	Date submitted	27 May 2025
Action sought	Provide feedback on attached access charging Cabinet paper	Priority	High
Reference	25-B-0127	DocCM	DOC-10310609
Security Level	In Confidence		

Risk Assessment	Medium	Timeframe	3 June 2025
Attachments	Attachment A – Draft Cabinet paper		

Contacts	
Name and position	Phone
Ruth Isaac, Deputy Director-General, Policy and Regulatory Services	9 (2) (a)
Angela Bell, Acting Director, Policy (Biodiversity, International, Funding)	9 (2) (a)
James Johnson, Manager, Budget and Funding Policy	9 (2) (a)

Executive summary – Whakarāpopoto ā kaiwhakahaere

1. This briefing seeks your feedback on a draft Cabinet paper (Attachment A) on access charging. The paper reiterates the funding challenges facing the Department of Conservation (DOC) and highlights the difference new revenue could make for conservation outcomes. It summarises feedback from public consultation and seeks Cabinet agreement to the legislative framework for access charging.
2. We previously briefed you on implementing area-based charges as a levy and track charges as a fee, governed by different regulatory requirements (briefing 25-B-0124 refers). Following further consideration, we now recommend implementing both charges via the same levy-making power. This will be simpler to implement, regulate, and communicate to the public. It will also provide Cabinet with more oversight and the public with more opportunity to input.
3. One option for implementing access charges is using roads to charge, which is common in other international jurisdictions. This is not possible under current legislation, so we recommend Cabinet agrees to enable it as an implementation option. We recommend that you discuss this proposal with the Minister of Transport ahead of going to Cabinet.

We recommend that you ... (Ngā tohutohu)

		Decision
a)	Provide feedback on the attached draft Cabinet paper by 3 June	
b)	Agree that area-based charges and track charges be enabled through the same levy-making power	Yes / No
c)	Agree to seek Cabinet approval to enable the collection of access charges via the use of roads as a possible implementation option	Yes / No
d)	Note we will provide further advice on funding for implementation, including possible IVL funding	
e)	Note that to lodge in time for ECO on 25 June, Ministerial consultation will need to start on 5 June	
f)	Note we have provided you with a separate briefing (25-B-0188) on the exemptions and discounts for access charging, which should be read alongside this paper	
g)	Note we suggest you discuss the proposals with the Ministers of Finance, Tourism and Hospitality, and Transport	

9 (2) (a)

Date: 27/05/2025

Ruth Isaac
Deputy Director-General, Policy and
Regulatory Services

Date: / /

Hon Tama Potaka
Minister of Conservation

Purpose – Te aronga

1. To seek your feedback on a first draft of your Cabinet paper on access charging (Attachment A).

The paper covers the key decisions required from Cabinet to enable access charging

2. We recommend that the paper:
 - reiterates DOC's funding challenges and the positive impact new revenue could make on conservation outcomes.
 - summarises the feedback received from public consultation on the proposal.
 - seeks Cabinet approval to:
 - establish access charges as a new levy, with revenue ringfenced for conservation outcomes;
 - enable access charges for both international visitors and New Zealanders;
 - enable discounts and exemptions (with the specifics in regulations) for various groups;
 - the criteria for identifying and selecting locations for access charging; and
 - investigate access charges, including consultation, at four sites: Piopiotahi/Milford Sound, Aoraki/Mt Cook, Mautohe Cathedral Cove, Tongariro Alpine Crossing.
3. We are providing advice on exemptions in briefing 25-B-0188, and we will update the Cabinet paper to reflect your decisions on this briefing.
4. Following your feedback on the Cabinet paper, we are proposing Ministerial and agency consultation takes place from 5 June 2025 to 17 June 2025.
5. This will enable you to lodge the paper for ECO on 25 June and Cabinet on 30 June 2025. This timeline aims to achieve your intent of passing legislative reforms within this Parliamentary term.

The paper reiterates to Cabinet the considerable funding challenge facing conservation in New Zealand, and the potential impact of new revenue

6. The paper frames access charges in the context of the funding challenges facing conservation. Our biodiversity is in crisis and our visitor network is not sustainable at the current size and funding levels.

7. 9 (2) (g) (i)

8. 9 (2) (g) (i)

¹ 9 (2) (g) (i)

The paper sets out what we heard through public consultation and key opportunities to mitigate concerns with access charging

9. Public consultation on access charging was undertaken from 15 November 2024 to 28 February 2025.
10. As you are aware, the majority of submitters (63%) were opposed to access charging. Further submissions analysis has highlighted that the main reasons people are opposed, include that:
 - freedom of access to PCL is a basic right of New Zealand citizens.
 - people already contribute to DOC through their taxes.
 - charges will create a financial barrier to access.
11. Responses from the online survey to the question of who should be charged showed 86% opposed charging everyone, but 72% supported charging international visitors. Submissions analysis showed support for charging international visitors because:
 - they do not contribute as much through taxes.
 - they are financially better off and able to pay.
 - pressure on PCL infrastructure is often caused by high numbers of international visitors.
 - charges are common overseas, and international visitors are used to paying.
12. Submitters highlighted they would only support a charge if the revenue was additional funding for conservation, not a replacement for existing Crown spending, and that it would damage the social license of any charge if the revenue in effect went to other Government portfolios.
13. Submissions from Iwi and Hapū, and feedback from engagement hui, recommended that Māori should be exempt, either in their rohe or across the motu.
14. We have highlighted in the draft paper that limiting the places where access charging can be introduced (by establishing clear criteria for eligible sites) and providing for exemptions and discounts will help to mitigate some of the concerns with the proposal.
15. Resourcing constraints have delayed the full summary of submissions. We will attach the full summary to the Cabinet paper when it is lodged for ECO.

A key decision for Cabinet will be whether to charge New Zealanders or only international visitors

16. Briefing 25-B-0124 set out the broad options for charging international visitors and/or New Zealanders. The Cabinet paper reflects your decision to charge New Zealanders but at a discounted rate.
17. The benefits of this approach are that it:
 - has potential to raise the most revenue for improving conservation outcomes.
 - maintains an equitable approach between different visitors, with users contributing to experience upkeep regardless of their origins.
 - will be simpler to implement and enforce.
 - gives the Government the most flexibility in introducing charges.

18. The paper acknowledges there will be opposition from the public and stakeholders but this can be partially mitigated through the use of discounts and exemptions.
19. Briefing 25-B-0188 provides advice about potential exemptions and we will update the Cabinet paper once you have made decisions on this paper.
20. We are also considering discounts for a range of other groups.
21. The Cabinet paper includes an alternative option of charging only international visitors. Charging only international visitors received more support during consultation but would generate less revenue and would place a higher burden on international visitors using the same experiences as New Zealanders. 9 (2) (g) (i)

22. 9 (2) (g) (i)

After further consideration, we now recommend both area-based and track charges are enabled using the same levy-making power, as it will be simpler to implement

23. In briefing 25-B-0125, we outlined key decisions for you on the design of both area-based access charges and track charges.
24. You agreed to set up area-based access charges as a new levy with key implementation details in secondary legislation, while track charges would be set up as a new facility fee and use existing DOC operational policy for implementation.
25. After further consideration, we now recommend implementing area-based and track charges via the same levy-making power. This will be simpler to implement, regulate, and communicate to the public.
26. This approach will put more safeguards in place for the introduction of track charges, for example by ensuring they are subject to the same consultation, review, and principles on rate as area charges. It will also provide more oversight for Cabinet, who will need to agree the regulations and will ensure that relevant stakeholders can provide input on any new charge.
27. We are seeking your agreement to this revised approach, which we have reflected in the draft paper due to timing constraints.

We may want to charge people for using roads to access some locations, which would require amending transport legislation

28. There are a number of ways to implement access charging, e.g. an online payment system with spot checks at site or a checkpoint on a road. We will provide advice on implementation options after Cabinet has made decisions. The best options will depend on the policy parameters of the scheme, and the sites selected.
29. One option for implementing access charges is to charge visitors for using the road into the location e.g. the roads to Piopiotahi/Milford Sound and Aoraki/Mt Cook. This is a common approach overseas. Both roads are state highways and current legislation does not allow the Government to charge on these roads. At present, tolls can only be put on new roads and where a free alternative road exists.
30. We recommend Cabinet agrees to enable collection of access charges via the use of roads as a possible implementation option. We recommend that you discuss this proposal with the Minister of Transport ahead of going to Cabinet. This does not commit us to using roads to charge but keeps our implementation options open.

We will provide further advice on funding options for implementation

31. Implementing charges will come with upfront costs, before revenue starts being generated. The costs are dependent on Cabinet decisions about the design of the charges. Some of the initial costs of investigating the four locations may be able to be covered by existing programmes of work at those locations.
32. We will provide further advice on funding options, including the use of IVL funding, once the costs are known. The financial implications section of your Cabinet paper reflects this proposed approach.

Risk assessment – Aronga tūraru

33. **9 (2) (g) (i)** [REDACTED]
[REDACTED]
[REDACTED]
34. Limiting where charges can be introduced, and providing discounts and exemptions, are your best option for mitigating these risks if you proceed with charging New Zealanders.
35. The table below outlines possible criticisms of access charging and recommended mitigations:

Criticism	Mitigation
Reduced access to PCL for some people due to creating an additional financial barrier.	Discounts and exemptions can be used to lessen the impact of the financial barrier. The vast majority of PCL will remain free to access, providing plentiful opportunities for New Zealanders to connect with nature.
Reduced demand from international visitors and New Zealanders, impacting tourism and regional economies.	Research for the Milford Opportunities Projects showed less than 1% of international tourists would be put off from visiting New Zealand by an access charge at Piopiotahi/Milford Sound. We will monitor demand at any locations where charges are introduced.
Unintended consequences, such as visitors walking off tracks, parking away from the site, or walking in to avoid access charges.	We will investigate appropriate visitor management tools at any location where access charges are introduced.
Too many charges for internationals	We will streamline concessions charges and access charges to prevent duplication. Access charges will be targeted to users so fairer than further increasing the blanket IVL.

Consultation – Kōrero whakawhiti

36. When developing advice on access charging, we have consulted with the Treasury, the Ministry of Business, Innovation and Employment (MBIE), the Parliamentary Counsel Office, the Legislation Design and Advisory Committee, and the Ministry of Transport.

37. As part of agency consultation, we will share the draft Cabinet paper with: the Treasury, MBIE, the Ministry for the Environment, Land Information New Zealand, the Department of Prime Minister and Cabinet, the Ministry for Primary Industries, Te Puni Kōkiri, Te Arawhiti, the Ministry for Regulation, the Ministry of Transport, the Ministry of Justice, and the Department of Internal Affairs.

Next steps – Ngā tāwhaitanga

38. We are seeking your decisions on the recommendations in this paper and feedback on the attached draft Cabinet paper by 3 June 2025. This will allow us to update the Cabinet paper ahead of getting it back to you on 5 June to begin agency and Ministerial consultation.
39. Ministerial and agency consultation will run concurrently for two weeks until 17 June. Following this, we will incorporate feedback and seek your agreement to lodge the final Cabinet paper on 19 June for discussion at ECO on 25 June, and Cabinet on 30 June.

ENDS



Briefing: Access charging – Discounted rates and revenue allocation

To	Minister of Conservation	Date submitted	27 May 2025
Action sought	Agree to the legislative framework for exemptions and discounts for access charges. Agree to the proposed further work to develop an approach for allocating levy revenue.	Priority	High
Reference	25-B-0188	DocCM	DOC-10337540
Security Level	In Confidence		

Risk Assessment	High	Timeframe	3 June 2025
Attachments			

Contacts	
Name and position	Phone
Ruth Isaac, Deputy Director-General, Policy and Regulatory Services	9 (2) (a)
Angela Bell, Acting-Director, Policy	9 (2) (a)
James Johnson, Manager, Budget and Funding Policy	9 (2) (a)

Access charges – differential charging, exemptions, discounts and waivers

1. Access charges to some areas of the public conservation estate have the potential to raise between \$60 and \$139 million per annum. For reasons of fairness and equity, as well as reward for conservation contributions by some groups and individuals, we recommend allowing some discounts and exemptions as part of the legislative design.
2. Discounts and exemptions from an access charge provide a way of ensuring that certain groups (such as children) can continue to visit conservation areas without facing a cost barrier. Reduced or zero charges for some groups will help support public trust and acceptance for the new charging regime. An important design principle is that the regime must be as simple as possible to implement and enforce.
3. We recommend:
 - a) **Enabling a differential rate for the access levy** for international visitors and New Zealanders, with New Zealanders paying a lower rate. A differential rate is prevalent internationally. Allowing for a differential rate recognises the contribution New Zealanders already make to conservation via general taxation.
 - b) **Enabling an exemption and discount regime**, with the specific detail of the various groups/individuals or periods of year to be set out in regulation. We have provided an indicative list of the various groups that could be considered and recommend you seek Cabinet's agreement later this year on the final list (as part of the development of the access levy regulation).
 - c) **The Director-General has the power to waive the access levy in limited circumstances**, on a case-by case basis, to provide discounts for certain situations. For example, waivers to enable Iwi to undertake specific kaitiaki responsibilities. Criteria to govern the granting of waivers will be specified in regulations (scheduled to be developed early next year).
4. Exemptions for Māori were also suggested by a number of submitters on the consultation. There are several options: to exempt all Māori, or Iwi within their rohe, or have no specific exemption. Māori could also be covered, in part, by general exemptions, such as 'locals living near the area'. There are Treaty considerations.

9 (2) (g) (i)
5. Given the complexity of developing an exemption for Māori, we do not recommend any exemption from access charging for Māori per se. We recommend you consider three practical alternative options to ensure cost is not a barrier for Māori and other New Zealanders:
 - a) Either provide an exemption for all New Zealanders. Exempting all New Zealanders could reduce revenue by 5–10 percent at the four initial sites being considered for a levy.
 - b) Or only charge New Zealanders in the peak tourism season and provide an exemption for all New Zealanders in the off-season.
 - c) Or provide an exemption for all locals throughout the year.

Revenue allocation

6. Some submitters recommended that levy revenue be provided directly to third parties, such as Iwi, and/or that Iwi should have a role in determining how the revenue is spent. We recommend no revenue from access charges should be specifically earmarked for Iwi, councils or other bodies. All levy revenue will be appropriated in full to the Department of Conservation (DOC). The allocation of levy revenue will be determined by the Director-General, based on investment principles to be developed and agreed by you and Cabinet later this year.
7. The legislation will include requirements on the Director-General to report annually on how the levy has been spent. This supports the ongoing social license for the levy by providing transparency on levy expenditure.

We recommend that you ... (Ngā tohutohu)

Access charges – exemptions, discounts and waivers		Decision
a)	Note that many submitters on the access charging discussion document proposed a variety of discounts and exemptions from an access charge for many groups and/or activities.	Noted
b)	Agree that the primary legislation will enable a differential levy, and that New Zealanders will pay a lower rate than international visitors (with the specific rates for all visitors to be set in regulation).	Yes / No
c)	Agree that the ability to provide exemptions and discounts will be enabled in the primary legislation, but the specific eligible categories (people or time periods) will be specified in regulations and agreed by Cabinet in late 2025/early 2026.	Yes / No
d)	Note that we have provided an indicative list of possible exemptions and discounts (Appendix Two) which you may wish to use in any discussions with Ministerial colleagues.	Noted
e)	Agree that the Director-General has the power to waive the charge for entry on a case-by-case basis in limited circumstances and with having regard to specified criteria (to be established in regulation).	Yes / No
f)	Note that Treaty of Waitangi settlements were negotiated when legislation applying to public conservation land guaranteed free access to conservation areas, and that introducing an access charge creates a potential price barrier for Māori to exercise kaitiaki responsibilities, and maintain whakapapa connection to the land and their heritage.	Noted
g)	Note that the options to provide an exemption for Māori introduces Treaty considerations. 9 (2) (g) (i)	Noted

h)	Agree that to keep the system simple, maximise revenue, support access for New Zealanders and acceptability of the scheme, to: a) Either provide an exemption for all New Zealanders (that is, do not charge domestic visitors). b) Or only charge New Zealanders in the peak tourism season, and provide an exemption for all New Zealanders in the off-season. c) Or provide an exemption for all locals throughout the year.	Yes / No Yes / No Yes / No
Revenue allocation		
i)	Agree that the allocation of levy revenue will be determined by the Director-General, based on investment principles and government's high-level priorities for enhancing visitors' experiences in conservation area.	Yes / No
j)	Note we will provide further advice on the levy allocation process, and will seek Cabinet approval for the investment principles that will guide the allocation of levy revenue later this year.	Noted
k)	Agree that to ensure transparency and accountability no revenue from access charges will be automatically provided to Iwi, local authorities, or any other third-parties, with all levy revenue appropriated in full to DOC, who will then make investment decisions on its use in line with Government policy.	Yes / No

9 (2) (a)

Date: 27/05/2025

Ruth Isaac
Deputy Director-General,
Policy and Regulatory Services

Date: / /

Hon Tama Potaka
Minister of Conservation

Purpose – Te aronga

1. This paper seeks your agreement to:
 - the legislative framework for differential pricing, exemptions, discounts, and waivers for access charges (including for Māori or Iwi)
 - how levy revenue will be allocated (including whether Iwi have a role in allocation).
2. These decisions will inform the development of legislation for the new access charging regime, your upcoming Cabinet paper on access charging, and the access charging regulations.

Background and context – Te horopaki

3. This is the fourth (and final) briefing in a series of briefings seeking your decisions on the legislative framework for access charges on some public conservation land (PCL).
4. The previous briefings and forward Cabinet decision timeline to achieve your intent of passing legislative reforms within this parliamentary term are set out in Table One.

TABLE ONE: FORWARD TIMELINE OF ADVICE/DECISIONS TO INFORM CABINET PAPER

Date	Access Charging – Policy for legislative design	Briefing	Decisions
9 April 2025	Types of charges and who the charges would apply to	25-B-0124	Agreed area-based access charges and track charges for both international and New Zealand visitors.
23 April 2025	Key legislative design parameters for area-based access and track charges	25-B-0125	Agreed introducing a new levy for an area, with regulations to set levy rate (and discounts) and the criteria for selecting locations for charging.
7 May 2025	Criteria for selecting locations for access charging, and initial locations to investigate.	25-B-0126	Agreed the criteria for location selection and initial investigation at four sites, with targeted consultation.
27 May 2025	Discounts and exemptions for access charging and levy revenue allocation	25-B-0188	
27 May 2025	Draft Cabinet paper		
5–17 June 2025	Ministerial consultation on Cabinet paper		
25 June 2025	Cabinet Economic Policy Committee		
30 June 2025	Cabinet considers proposal for access and track charges		

Discounts and exemptions to access charging

5. International jurisdictions often provide discounts and exemptions to some groups visiting conservation areas. **Appendix One** provides a summary of the range of groups who receive a discount or exemption in overseas jurisdictions – some common groups are older people, disabled people, veterans, children and students.
6. Exemptions, discounts and waivers of access charges are designed to ensure certain groups/individuals continue to have access to conservation areas due to wider public policy objectives.¹

DOC's current discount policy and access charging

7. The Department of Conservation's (DOC) current discounts policy for use of recreation facilities aims to:
 - incentivise the use of DOC's recreation facilities, and thereby encourage a connection with nature, heritage, and conservation
 - reward the contribution of organisations towards conservation and recreation
 - provide targeted affordable options that facilitate access to DOC's recreation facilities for sections of society with limited resources, to encourage connection with nature.
8. In recognition of this, New Zealanders currently pay less than international visitors for Great Walk huts (known as 'differential pricing'). A wider discount policy also applies for some organisations and visitors booking DOC huts and campgrounds.
9. Access charging has different considerations to charging for use of facilities because:
 - restricting local Iwi access to an area with cultural significance may have Treaty of Waitangi (Treaty) implications
 - people working for concessionaires and their families may live within a park or other areas where an access charge applies
 - people require access to or through conservation areas to deliver services or goods (e.g. DOC staff, emergency workers, workers providing a service such as infrastructure maintenance, Council staff, those regularly delivering goods, and the fishers and those servicing the fleet that operates out of Deep Cove in Milford Sound).

Feedback from submitters on exemptions and discounts

10. Most submitters thought only international visitors should be charged for access to PCL. If New Zealanders were charged, many individual and Iwi submitters wanted to see exemptions from access charges for Iwi with mana whenua due to: historical gifting of land to become PCL, Treaty implications of charging, and the need to uphold rights and responsibilities as kaitiaki. In particular, Iwi submitters wanted to see exemptions from access charges when engaging in cultural and customary activities.
11. We received a number of submissions from hunters and hunting organisations that sought an exemption for hunters – to acknowledge their wider conservation work keeping animal numbers in check and maintaining huts and tracks.
12. Many submitters wanted volunteers, volunteering organisations and groups contributing to conservation restoration to receive an exemption. They argued that

¹ In this briefing, an *exemption* means an entry charge will not apply and a *discount* means a reduction from the specified charge (variable for different groups or activities). The eligibility and the rate of discount could be varied from time to time. A *waiver* is an exemption from a charge that would otherwise apply and is granted on a case-by-case basis (by the Director-General).

DOC should be encouraging this behaviour as they're providing a community/public service. Other groups mentioned for exemptions/discounts included: clubs or recreational groups, school groups, community service card holders, pensioners, those with disabilities; and low-income households.

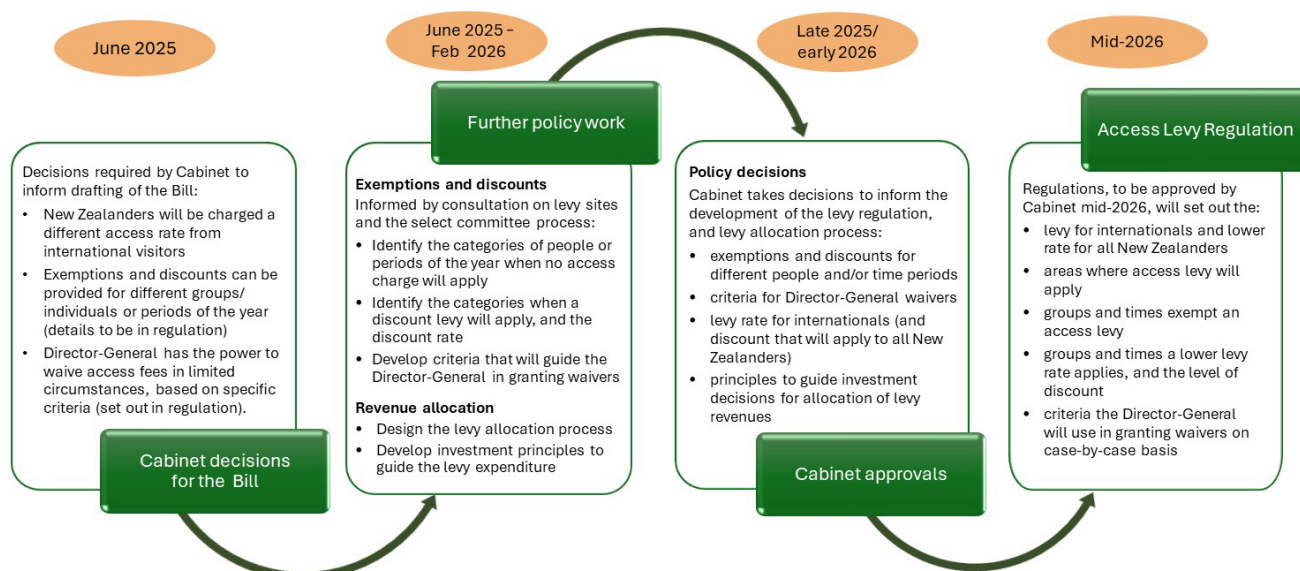
We recommend New Zealanders pay a lower rate

13. You previously decided that New Zealanders and international visitors should both be subject to an access charge to some areas of PCL (25-B-0124 refers).
14. We recommend the primary legislation enable a differential levy – this would enable Cabinet to decide later whether to exempt all or some New Zealanders from the levy, or to pay a lower rate than international visitors. The lower rate and exemptions would be subsequently confirmed in regulations. However, given there is likely to be significant public and media interest throughout the legislative process on the question of whether New Zealanders pay for access, we suggest Cabinet make a policy decision on whether or not to charge New Zealanders now.
15. Differential pricing acknowledges the contribution that New Zealanders make through general taxation. This provides certainty for drafting and would support future public communications.

We recommend exemptions and discounts be enabled in primary legislation but specified in regulations

16. We recommend that primary legislation enables the Minister of Conservation to provide exemptions and discounts for various groups, or time periods or activities, and that these will be specified in regulations.
17. Exemptions and discounts could apply in a variety of circumstances – to different groups of people, particular types of events or activities, or periods during the year (low visitor periods). It is important exemptions/discounts do not create an overly complex pricing regime or implementation model.
18. We will be undertaking further work on discounts and exemptions. Our early thinking on the groups that could receive a discount or exemption is noted in **Appendix Two**, which you may wish to use for any discussions with Ministerial colleagues on the Cabinet paper proposals for an access levy.
19. Regulations provide flexibility by enabling the Minister to recommend to Cabinet the addition, amendment or removal of some discounts and exemptions in the future, as well as adjusting the level of discount for different groups or activities as circumstances evolve.
20. We also recommend that primary legislation provide a discretionary power for the Director-General of Conservation (Director-General) to waive (in full or in part) access charges for groups/individuals for unique circumstances or events. Criteria for Director-General waivers would be set out in access levy regulations.
21. We will provide you with more detailed advice on the regulations for exemptions and discounts and criteria for Director-General waivers later this year. This will include the specific groups, and their level of discount. These will need to be approved by Cabinet. A high-level timeline for the proposed Bill and regulations development process is shown in Diagram One (below).

DIAGRAM ONE: TIMELINES AND KEY DECISIONS FOR LEGISLATION AND REGULATION



Options for exemptions from access charges for Māori or Iwi

22. We provided you with a summary of public feedback on the implications of charging on Treaty partners in Briefing 25-B-0124, and many submitters wanted to see exemptions from access charges for Iwi with mana whenua.
23. Māori have customary responsibilities relating to land and marine spaces, including PCL. Access to PCL is essential to being able to fulfil roles as kaitiaki, to access taonga, engage in cultural practices such as for rongoā, raranga, mahinga kai purposes, to exercise tikanga and other responsibilities.
24. Treaty settlements between the Crown and Māori were negotiated in the context that access was free to whenua in the conservation estate. Requiring Māori to now pay for access to some areas could be a barrier to their connection to the whenua ^{9 (2) (g) (i)}
25. The Waitangi Tribunal has found that Article 2 of Te Tiriti guaranteed that kaitiaki would have rangatiratanga over their taonga,² and that the relationship between kaitiaki and their taonga is entitled to a reasonable degree of protection.
26. Treaty settlements often provide for recognition of particularly significant places, and some provide for connection to whenua so customary uses and practices can be maintained. Any such specific commitments to access under individual Treaty settlements would continue. ^{9 (2) (g) (i)}
27. ^{9 (2) (g) (i)}

2 Waitangi Tribunal (2011): *Ko Aotearoa Tēnei: A report into claims concerning New Zealand law and policy affecting Māori culture and identity* (WAI 262), p 703.

3 ^{9 (2) (g) (i)}

28. There are three options around this issue that we explore in **Appendix Three**:
- a) Māori are exempt from access levy within their rohe
 - b) Māori are exempt from access levy across the motu
 - c) Māori are not provided with any exemption or discount from access levy beyond the general discounts available to all New Zealand residents and citizens.

There are trade-offs between these options...

29. An exemption for Iwi within their rohe, or for all Māori, best preserves the context in which Treaty settlements were agreed (and are currently being negotiated) where access was free. These two options also recognise the significance of the cultural connection of Māori to particular conservation areas and are giving effect to the Waitangi Tribunal's finding in the WAI 262 report.
30. 9 (2) (g) (i) [REDACTED]
31. 9 (2) (g) (i) [REDACTED]
32. An exemption for Māori also poses significant implementation and compliance challenges. 9 (2) (g) (i) [REDACTED]. In Canada, where an indigenous peoples' exemption is provided, there are identity cards to verify eligibility. 9 (2) (g) (i) [REDACTED]

Alternative options to a specific exemption for Māori or Iwi

33. We do not recommend a specific exemption for Māori given the issues noted above. General exemptions could provide avenues for some Māori and Iwi to be able to have free access. For example, 'locals living near the area' would cover local Iwi in the vicinity of the area.
34. This generalised approach, however, is unlikely to result in all Iwi from within their rohe being eligible for a discount, given that a significant portion will likely live elsewhere in New Zealand or overseas.
35. An additional option could be to only charge New Zealanders during 'peak times', which would mean New Zealanders (including Māori) would have free access for most of the year.
36. Given the complexity of these options, you may alternatively wish to revisit your previous decision of charging everyone and simply provide an exemption for all New Zealanders.
37. If all New Zealanders were exempt from the access levy, we estimate a revenue reduction of the order of 5–10 percent in the case of the four sites we are currently exploring for a levy introduction, based on a simple estimate of New Zealanders paying half of the international levy).⁵

4 [Cabinet Office Circular CO \(24\) 5 Needs-based Service Provision](#), 13 September 2024

5 This rough estimate of the revenue impact is highly dependent on the price differential (50% less for New Zealanders) and the numbers of domestic visitors (who make-up just 12% of all visitors at the four sites). We've assumed all visitors will pay the levy, but New Zealanders are probably less willing-to-pay a levy than international visitors. We will be undertaking further work on willingness-to-pay as part of our investigation of the four sites.

38. Establishing a differential levy in primary legislation for New Zealanders provides the opportunity to determine later in the legislative process whether to provide an exemption for all New Zealanders, or for particular groups (such as Iwi). ^{9 (2) (g)}
⁽ⁱ⁾

Revenue allocation

Submissions on revenue allocation

39. Submissions were clear that revenue from access charging should be additional to Crown funding, and that it should be allocated to conservation work – for biodiversity purposes, enhancing visitor experiences and maintaining visitor-related infrastructure. Feedback from engagement hui, and some submitters, outlined that a portion of access charging funding should be used for Iwi initiatives, or allocated directly to Iwi, particularly if it was generated in areas of cultural significance.
40. Most submitters also noted that DOC should work alongside/engage with Iwi/hapū. Some submitters (predominantly conservation groups and Iwi groups) requested that Iwi be involved in decision-making on how funds are used, and some also sought Iwi co-governance for access charging decisions. Most Iwi groups submitting requested that a proportion of revenue is allocated to Iwi.

Allocation of revenue to Iwi and others

41. You have agreed that revenue from the access levy be collected for the purpose of maintaining and enhancing the visitor experience on public conservation lands. Revenue will be hypothecated for that purpose (25-B-0125 refers).
42. All Crown revenue will be appropriated to DOC. We do not recommend directly earmarking a proportion of levy revenue to any third party such as local authorities or Iwi, or to the area where the levy was collected. Earmarking a 'set' percentage in legislation would result in less efficient spending decisions, compared to DOC allocating funding based on Government's high-level priorities and the investment principles that have been agreed by Cabinet (and can be amended more readily).
43. The Director-General can contract with third parties (including Iwi) for the delivery of services to achieve the purpose of the access levy or may choose to have work delivered by third parties funded by a grant⁶ if that is the best way to achieve a conservation outcome.
44. Having one accountable party (the Director-General) who is responsible for reporting on expenditure (and changes in visitor outcomes) is the most efficient way for ensuring transparency and robust reporting on expenditure, which are both critical for gaining and maintaining social license for an access levy.

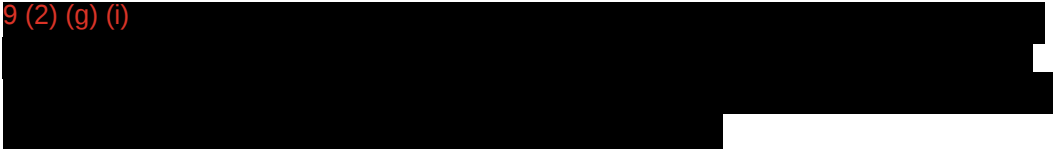
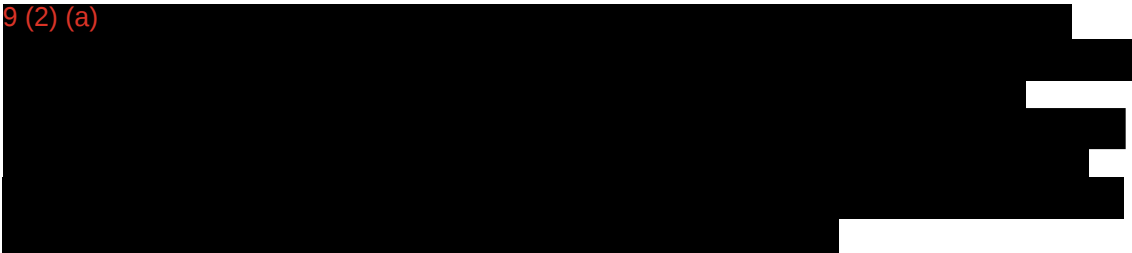
Establishing investment principles to guide allocation of levy revenue

45. You have also previously agreed the Minister of Conservation will set the high-level direction and priorities for expenditure of levy revenue and the Director-General will have the authority for day-to-day operational investment decisions (25-B-0125 refers).
46. The scale of funding raised through the levy is expected to be fairly substantial (estimated to be \$60–\$139 million yearly for the first four sites). While there can be some 'project-based' funding provision, the scale of the fund necessitates development of a robust and consistent approach so DOC can allocate funding efficiently and consistently, year-on-year, without introducing complex administrative and decision-making processes.

⁶ Under the Conservation Act 1987, s.53(2)(i)

47. Clear principles to guide the Director-General's decisions in allocating this sizeable levy fund will be developed for approval by Cabinet. The Director-General's investment decisions will need consider the issues and opportunities faced in managing public conservation land where the levy has been collected, as well as other areas where the visitor experience can be improved.
48. A degree of input from local authorities, concession operators, tourism and other businesses and Treaty partners may be appropriate over major conservation investment decisions proposed in their region from levy funding. We do not recommend creating a statutory requirement to engage and consult over levy allocation decisions, as this would be very time consuming, inefficient and could create expectations about engagement in wider Government expenditure decision-making.
49. The investment decision principles to guide DOC's allocation of levy revenue will cover off consultation requirements, how to determine the proportion that should be allocated to areas associated with where the levy income was generated, and how opportunities to improve visitor experiences will be prioritised. We will provide further advice on the investment principles so that you can seek Cabinet's agreement on them early in 2026.

Risk assessment – Aronga tūraru

50. 9 (2) (g) (i) 
51. 9 (2) (a) 

Consultation – Kōrero whakawhiti

52. We have not engaged with other agencies while drafting this paper, but will carry out agency consultation on the aspects that will be incorporated in the draft Cabinet paper.

Next steps – Ngā tāwhaitanga

53. Following your agreement, we will reflect your decisions in your draft Cabinet paper. We are providing you with the draft Cabinet paper on 27 May 2025, with the intention of taking the paper to the Cabinet Economic Policy Committee on the 25 June 2025 (subject to timing and extent of any Ministerial feedback).
54. Over the next six months we will be undertaking further work on the types of exemptions and discounts that could be included in regulation as well as the developing the process for allocating levy revenue.

ENDS

7 Cabinet Office circular CO (24) 5, issued 13 September 2024: Needs-based service provision.

Appendix One: Summary comparison of international entry free, exemptions and discounts

There are different approaches taken to 'charging for entry' in different countries, and even between states within a country. Given the limitations of information on websites, this summary may exclude some of the variations within a country, and between a 'fee to enter' as opposed to 'fee to use a facility' (such as a carpark).

Jurisdiction	Access charges	Applying to	Comment
Australia			
Queensland	No general access fee	All national parks	Different states have different entry requirements. Where charged, entry fees generally apply to persons in vehicles, not those arriving otherwise (e.g. walking or by bicycle).
Victoria	No general access fee	All national parks	
New South Wales	Daily rate per vehicle	45 of 895 national parks	Exemptions from national park entry fees are primarily available to Australian pensioners and veterans, who can apply for a National Parks Concession Pass. This pass allows for free entry into national parks that charge entry fees, and it can be applied for online. Additionally, children and teenagers under 18 typically have free entry to many national parks.
South Australia	Daily rate per vehicle	55 of 350 national parks	
Western Australia	Daily rate per vehicle or person	35 of 112 national parks	
Tasmania	Daily rate per vehicle or person	All national parks	The entry fee is generally additional to any fee charged for camping or other activities using facilities.
Federally managed parks	Parks pass	All national parks	
United States			
Federally managed parks	Daily rate per person	108 of 400 national parks	The same charge is levied to international as domestic visitors, however, exemptions from national park fees are available for certain individuals and groups which apply more to US domestic visitors than international visitors. These include children 15 years and under, military personnel, veterans, Gold Star Family members, 4th graders, individuals with permanent disabilities, volunteers with more than 250 hours of service and US senior citizens. There are designated fee-free days each year where all national parks waive entrance fees. Additional fees may apply for amenity or user fees for activities like camping, boat launches, or special tours.

Jurisdiction	Access charges	Applying to	Comment
Canada			
Nova Scotia	No general access fee	All provincial parks	In Canada, the same charge is levied to international as domestic visitors.
British Colombia	No general access fee	All provincial parks	
Prince Edward Island	No general access fee	All provincial parks	
New Brunswick	No general access fee	All provincial parks	Several universal exemptions to national park admission fees exist, including free admission for youth under 18 years, active members and veterans of the Canadian Armed Forces and their immediate families, and newcomers to Canada and new Canadian citizens. Additionally, support persons accompanying visitors with disabilities receive free admission.
Alberta	Daily rate per vehicle	All provincial parks	
Ontario	Daily rate per vehicle	Specific provincial parks	
Quebec	Daily rate per person	All provincial parks	Indigenous peoples with valid status cards may access national parks and historic sites in Canada for free to recognise historical and cultural connections with these lands.
Manitoba	Daily rate per vehicle	All provincial parks	
Saskatchewan	Daily rate per vehicle	All provincial parks	
Newfoundland/Labrador	Daily rate per vehicle	All provincial parks	Discounts apply to seniors (65 years and over) and families in a single vehicle. The annual Discovery Pass provides a significant discount if multiple parks are being visited compared to purchase of day passes for each park.
Federally managed parks	Daily rate per person	All national parks	
China			
			In China, national park entry fees are typically exempted for certain categories of individuals, primarily based on age and status. Specifically, free entry is granted to children under 6 years old, individuals 60 years old and above, and active military personnel and law enforcement officers. Additionally, specific national parks may offer free entry to local residents within the park's jurisdiction.
Taiwan (ROC)			
			The entrance fee to Alishan National Forest Recreation Area in Taiwan is NT\$300 (\$NZ16) per person for a full-price ticket. Discounted tickets and free tickets are available for those with disabilities, children under 3 years old, and those arriving by public transport.

Jurisdiction	Access charges	Applying to	Comment
Italy			
			In Italian national parks, exemptions from entry fees generally apply to minors (depending on the specific park, often under 10 or 6 years), elderly individuals (often over 75 years), and individuals with disabilities and their carer-givers. Some parks may also offer exemptions for those with written consent from the park for institutional, cultural, or public interest reasons.
Czech Republic			
			In the Czech Republic, some individuals are exempt from or receive reduced fees for national park entrance, including children, students, and those with disabilities. Specifically, children under 7 years of age are typically free, while students and pensioners might receive a reduced fee. Some exemptions may also be specific to individual national parks.
Chile			
			In Chile, exemptions from national park fees generally apply to children under 18 years and adults aged 60 years and older. These age-based exemptions are common for both Chilean residents and foreigners. Additionally, people with disabilities may also be exempt from park fees. Specific regulations and eligibility may vary by park.
Colombia			
			In Colombia, several groups are exempt from national park entrance fees. These include children under 5 years, Colombian nationals over 65 years, staff of the Natural National Park System and their families, public servants and contractors working for the parks, students and teachers from public institutions in strata 1 and 2, residents of small towns adjacent to parks, volunteer park rangers, researchers working on park projects, individuals with disabilities, and members of indigenous communities within or near protected areas.

Appendix Two: Indicative exemptions and discounts for inclusion in regulations

Exemption (no access charge)		Rationale
Conservation volunteers authorised by DOC to work within an area		Recognising volunteers' contribution to conservation efforts.
Young children (under 5 years of age)		Currently infants have a 100 percent discount under DOC's hut fees policy ⁸ , and this exemption maintains consistency with current settings.
DOC staff (and contractors) while on DOC business		All DOC staff and those working on behalf of DOC to provide services in the area.
Workers in the area: ○ emergency workers (e.g. Police, search and rescue/coastguard, fire fighters) ○ people delivering goods or services		Providing certainty of free access for key personnel and workers who need to enter conservation areas (e.g. biosecurity, aviation or maritime, transport, defence personnel on exercise in the area).
Persons conducting conservation research in the area under a valid research authority (permit) issued by DOC		Recognising the importance of research to support conservation efforts.
Local residents living near the area		Locals (including Iwi) living within a specified distance (say 50 km) of the area.
Discounts (reduced charge)		
Community Service card holders		Discounts to reduce the cost barrier for access to conservation areas for different groups.
Gold Card holders		
Disabled people		
Children and young people		Reduced charges for families, children and young people, school groups, to support recreational activity and engagement in conservation.
Families		
School groups		

⁸ Children and youth (5–17 years of age) receive a 50 per cent discount under DOC's hut fees policy.

Appendix Three: Options for exemptions and discounts for Māori and Iwi

Option	Pros	Cons
(A) Māori exempt from access charges within their rohe	- No entry price barrier to Māori freely accessing places of significance within their Iwi/hapū rohe. 9 (2) (g) (i) - Treats all Māori equally whether they have a Treaty settlement currently or not. 9 (2) (g) (i)	- Māori will probably consider it onerous and unreasonable to be required to present their whakapapa connections and/or relevant rohe boundaries. - This will be challenging to design and enforce – our ability to administer this system efficiently and fairly will be contingent upon the detailed design of the supporting compliance regime. 9 (2) (g) (i) 9 (2) (g) (i) 9 (2) (g) (i) - Does not recognise that places of cultural significance to Māori may be outside their rohe, and does not remove the entry price barrier for those instances.
(B) Māori exempt from access charges across the motu	- As for Option A but in addition this Option recognises that places of significance to Māori may be outside their rohe. - Removes the financial barrier of an entry charge for Māori to freely access places of significance. - Easier to implement than Option A.	9 (2) (g) (i) - Difficult to enforce – Māori will probably consider it onerous and unreasonable to be required to state their identity as Māori if asked. - The ability to administer this system efficiently and fairly will be contingent upon the detailed design of the supporting compliance regime.

Option	Pros	Cons
(C) Māori not provided with any exemption or discount from access charges beyond the general discounts available to all New Zealanders	• Fair to all New Zealanders – all are treated the same. • Easier to implement – DOC staff will not have to ask for a person to identify whether they are Māori during enforcement activities. • 9 (2) (g) (i) [REDACTED] • Maximises revenue. • If approved, the “Discounts for locals” is a partial proxy for a discount for Māori in their rohe. • Free access outside of the peak season also removes cost barriers.	• Potentially creates a price barrier for entry to places of cultural and whakapapa connection for Māori – other potential exemptions (locals, off-peak) can mitigate this. • 9 (2) (g) (i) [REDACTED] • 9 (2) (g) (i) [REDACTED]



Briefing: Revised access charging Cabinet paper for Ministerial consultation

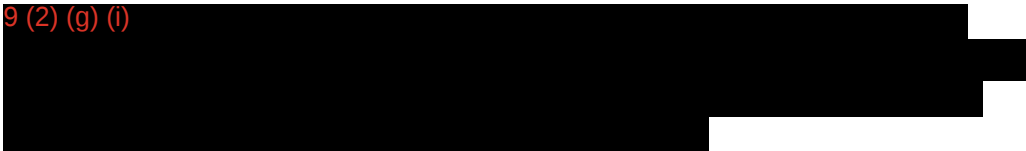
To	Minister of Conservation	Date submitted	18 June 2025
Action sought	Undertake Ministerial consultation on access charging Cabinet paper.	Priority	High
Reference	25-B-0240	DocCM	DOC-10349331
Security Level	In Confidence	Timeframe	23 June 2025
Risk Assessment	Medium		
Attachments	Attachment A – Draft Cabinet paper for Ministerial consultation Attachment B – Summary of Agency feedback		

Contacts	
Name and position	Phone
Ruth Isaac, Deputy Director-General, Policy and Regulatory Services	9 (2) (a)
Angela Bell, Acting Director, Policy (Biodiversity, International, Funding)	9 (2) (a)
James Johnson, Manager, Budget and Funding Policy	9 (2) (a)

Purpose – Te aronga

1. To provide you with:
 - a revised draft of your Cabinet paper on access charging for Ministerial consultation (**Attachment A**),
 - further advice on your recommendations to Cabinet,
 - a summary of feedback received during agency consultation on your cabinet paper (**Attachment B**).

We have revised the Cabinet paper based on your feedback

2. On 27 May 2025, we provided you with a first draft of your Cabinet paper on enabling access charging (25-B-0127 refers). We made the following key changes in response to your feedback:
 - Amended text on the problem definition, our current toolkit and the gap we are trying to address in paragraphs 9-13 of the updated Cabinet paper.
 - Included a table on revenue estimates based on charging only international visitors, or both New Zealand and international visitors, see paragraphs 18 and 19, Table One, and Appendix 1.
 - Emphasised the importance of prioritising investing at the location revenue is collected, paragraph 23 and recommendation 7.1.
 - 9 (2) (g) (i) 
3. You also directed us to revise the recommended option in the paper to enable charging for both international and New Zealand visitors, but to have a blanket exemption for New Zealanders in regulations, with a review in five years' time (see paragraphs 25-27 and recommendation 4). We have updated the Cabinet paper in line with your direction and provide further advice on this approach below.

There are benefits and risks with enabling New Zealanders to be charged in primary legislation, with a blanket exemption in regulations

This option provides for greater flexibility to introduce charges for New Zealanders in the future, but creates more uncertainty

4. Enabling access charging for all visitors in primary legislation, with a five-year review of an exemption for New Zealand visitors, provides flexibility to adjust the access charging framework at a later date. Future governments will have the ability to more easily introduce an access charge for New Zealanders in locations which meet proposed criteria (e.g. that are iconic and popular, with high visitor numbers) – requiring only a Cabinet decision to amend levy regulations, rather than a full parliamentary process to amend conservation legislation.
5. Although the provisions in the legislation are the same whether the access charge is implemented for New Zealanders immediately, or is just enabled for the future with an exemption in place, the way in which this is introduced could have a significant impact on the level of public scrutiny placed on the decision to charge New Zealanders.
6. Enabling access charging with an exemption for New Zealanders risks a negative public reaction because it opens the possibility of future governments charging New Zealanders and being able to do so without further Parliamentary debate. As such, the possibility of future access charges is still likely to be central to submissions and debate at Select Committee. It also creates considerable uncertainty around whether New Zealanders will be charged for access in the future.

7. The Cabinet paper proposes DOC be required to consult local communities on regulations for new access charges, and for any major changes or updates to access charges once they are in place. This will provide the public with more confidence that they will be able to influence decisions on areas with a charge, the amount charged, and any exemptions/discounts available for particular groups (such as locals living near the area). However, you could consider further checks and balances be included in primary legislation, such as specifying the nature of the review process for lifting the exemption on New Zealanders.

This approach reduces but does not remove the Treaty implications of the proposal

8. As articulated in briefings 25-B-0124 and 25-B-0188, the introduction and/or use of a power to charge members of Iwi to access sites of significance to them on PCL could have significant Treaty of Waitangi implications. Enabling access charging for all visitors in primary legislation, with a five-year review of an exemption for New Zealand visitors would delay some of the implications but would not mitigate the associated risk.

9 (2) (h)

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

We can learn from implementing charges from international visitors first, but this approach could also complicate implementation

13. A two-stage approach would allow us more time to bed in charges for international visitors, understand the practicalities of implementing the access charge, and better understand their application and impact before considering charging New Zealanders. However, it could add complexity and cost to implementation (e.g. if we design a more complex solution that can charge everyone, so that it remains fit-for-purpose if New

Zealanders are charged in the future). We will need to do further work on this when we investigate implementation options.

We recommend exempting New Zealanders in primary legislation or introducing charging for both international and New Zealand visitors at the same time

14. An exemption for New Zealanders in primary legislation would more effectively manage the legal risks and concerns raised during the consultation process. The government can publicly commit to a five-year review to reconsider access charges for New Zealanders.
15. 9 (2) (g) (i) [REDACTED] if government decided to proceed with an expansion of the access levy to domestic visitors following the five-year review, it would require a greater commitment of Ministerial and policy resources at that time.
16. Alternatively, and in line with our previous advice (25-B-0188 refers), we recommend that you consider charging both international and New Zealand visitors, supported by an exemption and discount regime that ensures that certain groups can continue to visit conservation areas without facing a cost barrier. This will help support public acceptance for the new charging regime.
17. Given the complexity of developing an exemption for Māori, we recommend that you consider practical alternatives that ensure cost is not a barrier for Māori and other New Zealanders. This includes either:
 - exempting 'locals living near the area' throughout the year; or
 - only charging New Zealanders during 'peak times' which would mean New Zealanders would have free access for most of the year.
18. A local exemption is unlikely to result in all Iwi from within their rohe being eligible for an exemption, given that a significant portion will likely live elsewhere in New Zealand or overseas. 9 (2) (g) (i) [REDACTED]
19. If you agree with either of the above options, we still have time to amend the Cabinet paper, although there will be a slight delay in Ministerial consultation and may require a truncated consultation period (e.g. eight days) to still be able to lodge the paper for ECO on 10 July (see detailed timeline below).

We have also made changes to the Cabinet paper based on agency feedback

20. We have received feedback on the draft Cabinet paper from the Treasury, Ministry of Regulation, Ministry of Transport, Ministry of Justice, Te Puni Kōkiri, Ministry of Business, Innovation and Employment (MBIE), Ministry of Foreign Affairs and Trade, the Parliamentary Counsel Office and Te Tari Whakatau (Office of Treaty Settlements). We have summarised their feedback and how we have addressed it in **Attachment B**.
21. Key feedback included 9 (2) (g) (i) [REDACTED]
 - I [REDACTED]
 - I [REDACTED]
 - I [REDACTED]

22. 9 (2) (g) (i) [REDACTED]
23. 9 (2) (g) (i) [REDACTED]
24. 9 (2) (g) (i) [REDACTED]

Next steps – Ngā tāwhaitanga

25. The table below sets out the current timeline for taking your paper to Cabinet. The next step is to circulate the paper for Ministerial consultation 23 June to 3 July 2025 (noting this is nine rather than the required ten working days to allow us more time to incorporate any feedback before it must be lodged for ECO).

Steps	Dates
Ministerial consultation	23 June – 3 July (or 26 June – 8 July to enable Cabinet paper revisions).
Summary of Submissions provided for your information	3 July
Finalised Cabinet paper and RIS provided to Office	9 July
Lodge finalised papers with ECO	10 July
ECO	16 July
Cabinet	21 July

We recommend that you ... (Ngā tohutohu)

		Decision
a)	Note that we have revised your Cabinet paper to include your recommended option to enable international and New Zealand visitors to be charged for access in primary legislation, with New Zealanders exempted in regulations, with a review in five years' time.	Noted
b)	Note that we recommend providing clarity on the scope of charging New Zealanders sooner, rather than later, to reduce uncertainty and enable a smoother select Committee process.	Noted
c)	Confirm your preferred option for Cabinet agreement: Access charges are enabled for both international and New Zealand visitors in primary legislation, but New Zealanders	Yes / No

Appendix B: Agency feedback

Agency	Substantive feedback	How we have addressed it
9 (2) (g) (i)	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
9 (2) (g) (i)	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
	[REDACTED]	[REDACTED]
		[REDACTED]

Agency	Substantive feedback	How we have addressed it
		9 (2) (g) (i)
	9 (2) (g) (i)	

Agency	Substantive feedback	How we have addressed it
9 (2) (g) (i) [Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]
[Redacted]	[Redacted]	[Redacted]

