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Submission on exploring charging for access to some public conservation land

Introduction

As one of the leading environmental Non-Governmental Organisations (eNGOs) in New Zealand, World Wide Fund for Nature New Zealand (WWF) supports science-based, pragmatic solutions that can deliver a future where humanity lives in harmony with nature. WWF appreciates the opportunity to make a submission on exploring charging for access to some Public Conservation Land (PCL).

In summary, WWF does not consider that the consultation document adequately canvasses the issues or the solutions for addressing pressures on the system from international visitors. It appears to be a quick fix solution to generate revenue without consideration of alternative funding mechanisms, nor acknowledgment of the systematic failures that hinders the Department's financial stability. It raises fundamental questions about the role of PCL and long-standing expectations that free public access is a guaranteed right. It is missing broader context that rationalises how the approach fits within a longer-term plan to increase sustained investment for the Department and why access charging is preferred over other options to manage tourism pressures.

We generally support exploring different mechanisms for managing tourism impacts and increasing revenue for core conservation services, however, we do not feel that this discussion document facilitates the right conversations to address those problems. With that in mind, we offer some considerations for policy development on this matter.

We can no longer afford a deficit mindset for nature

We are in the midst of a global biodiversity crisis with New Zealand having one of the highest rates of extinction per capita. Biodiversity in Aotearoa New Zealand is unique and essential to our culture, identity, and wellbeing. As of 2023, 94% of our reptile species, 82% of bird species, 80% of bat species, 76% of freshwater fish species, 22% of marine mammal species and 46% of vascular plant species are either facing extinction or are at risk of being threatened with extinction.¹ The major decline in our indigenous biodiversity is largely the result of the substantial reduction in the extent and quality of natural habitats. Pressures on our environment continue to degrade ecosystems including pressures of land-use change and intensification, pollution, natural resource use, climate change, and invasive species.²

¹ <https://www.stats.govt.nz/indicators/extinction-threat-to-indigenous-species/>

² Ministry for the Environment & Stats NZ (2022). New Zealand's Environmental Reporting Series: Environment Aotearoa 2022. Retrieved from [environment.govt.nz](https://www.environment.govt.nz)

The Department of Conservation (DOC) manages one third of the country in the form of PCL, the largest heritage portfolio in the country, and all our native species on less than 1 percent of New Zealand's Gross Domestic Product (GDP). And yet, successive governments have significantly underinvested in the Department and core conservation work for decades. This underinvestment has left the Department with a structural deficit and an inability to adequately fulfil its obligations to protect its natural and historical heritage for future generations. Last year, the Department was directed by the Government to cut an additional 6.5% of its budget, further reducing certain programmes and staff levels.

Our economy including primary industries and tourism are heavily reliant on a healthy natural environment. Primary industries in Aotearoa New Zealand make up 7% of our economy and earn annual export revenue of \$54.6 billion (2024).³ Tourism expenditure generated \$13.3 billion of direct value added, representing a 3.7% contribution to GDP (2024).⁴

The public conservation estate and the ecosystem services it provides is the cornerstone of Aotearoa New Zealand's economy. PCL provides ecological services like water storage and retention, nutrient cycling, healthy soils and pollinators – upon which the vast majority of primary industries rely. According to a recent NZIER report, the ecosystem services on PCL generate a gross value of \$16.42 billion per year through provisioning services, cultural services, regulating services and supporting services.⁵ Millions of visitors come to Aotearoa each year to see our stunning national parks and to recreate on PCL, contributing over \$8 billion to our economy. It is clear that nature is one of our biggest economic drivers and is inseparable from economic growth and prosperity.

To that end, significant investment should be directed towards core conservation objectives from access charging revenue. We acknowledge that revenue generation is difficult to ringfence; however, we consider there needs to be transparency to the payees and the public about what the money is intended to support. We propose establishing an agreed upon proportional split (much like the original International Visitors Levy) that favours biodiversity objectives and would provide greater transparency and accountability on the relative balance between addressing pressures from tourism and critical conservation services.

We need a long-term strategic plan for investing in nature

Our recent *Nature Positive Aotearoa* report shows that protecting nature could bring a net benefit to New Zealand's economy of more than \$270 billion over the next 50 years.³ The report also shows that investment in nature needs to increase by approximately 6.5 times the current spend - roughly \$22.5 billion per year – if we are to meet key targets under the Global Biodiversity Framework.

Investing in nature protects Aotearoa New Zealand's reputation internationally, as well as our appeal as a tourist attraction to have positive experiences with nature. International visitors come to New Zealand to experience our natural treasures and cultural heritage, which would suffer in the long run if there were no meaningful investment in nature beyond maintenance.

Before jumping to quick fix solutions for pricing mechanisms, it would behove the government to endeavour to develop a comprehensive approach to increasing sustainable financing for the Department over a 30-year period. This would enable wider conversations about how to unlock the economic potential of PCL in ways that are regenerative rather than extractive and can more strategically target sustainable finance solutions. Just focussing on access charging will not address

³ <https://www.wwf.org.nz/sites/default/files/2024-11/A%20Nature%20Positive%20Aotearoa.pdf>

⁴ <https://www.stats.govt.nz/information-releases/tourism-satellite-account-year-ended-march-2023/#:~:text=Total%20tourism%20expenditure%20increased%2039.6,3.7%20percent%20contribution%20to%20GDP.>

⁵ NZIER. 2024. The value of public conservation land. A report to the Department of Conservation.

many of the systematic issues that hinder DOC's ability to manage tourism pressures and to deliver core conservation outcomes. A discussion hyper-focused on one lever distracts from other transformative and enduring approaches that may be available.

Access charging shouldn't limit New Zealanders' access to nature

Aotearoa New Zealand has many unique landscapes and many iconic wild places that are deemed national treasures. New Zealanders deeply care about our environment, which is evidenced by the large number of community driven conservation efforts all over the country. As identified in the discussion document, the ability for people to connect to nature is incredibly important - providing conservation benefits, economic benefits, improved health and wellbeing and a strong sense of national identity.⁶ Access to nature has proven physical and mental health benefits. If fees are imposed, fewer people—especially those from disadvantaged backgrounds—will engage in outdoor activities such as hiking, camping, and wildlife observation. This could lead to equity issues and poorer health and wellbeing outcomes, including a lost sense of connection to nature.

We caution against the deployment of access fees that create barriers for lower-income individuals and families, or otherwise reduce their ability to enjoy nature and benefit from outdoor recreation. Discounts and exemptions could be a tool to mitigate this issue, but not without significant administrative overheads. It is also important that tangata whenua can freely exercise cultural connections with ancestral lands as kaitiaki and any approach to access charging needs to uphold section 4 of the Conservation Act and existing Treaty settlements.

The International Visitors Levy (IVL) is a straightforward and efficient mechanism

Access charging may impose new administrative burdens and costs. Implementing and enforcing an access fee system requires infrastructure, resources and staff. These additional costs may outweigh the revenue gained and redirect funds away from important conservation work of DOC.

The IVL is a straightforward, elegant tool for generating revenue to address tourism pressures and delivering biodiversity outcomes. It was recently increased from \$35 to \$100 per person and applies to all international visitors to New Zealand, except people from Australia and the Pacific Islands. In 2023/24, the IVL raised \$62.5 million, and the revenue was split 50:50 between tourism and conservation.

WWF considers the IVL to be fit-for-purpose as it's easy to administer, was intended to address the problems identified and will not require additional compliance and monitoring costs. It could also be expanded to apply to people from Australia. Ideally, more IVL revenue would be ringfenced for conservation and should not come at the expense of decreased government funding. However, we also acknowledge there may be some place-based considerations where access charging should apply and we think that taking a seasonality approach might make sense in highly trafficked areas.

Access charging may have unintended consequences

WWF has concerns regarding the environmental carrying capacity of sites. As a result of some sites charging for access, more people may opt instead to visit the free access sites, creating overcrowding and having negative impacts on those environments. People may also attempt to access conservation land through unofficial and potentially harmful routes to avoid fees, increasing environmental damage and safety risks. Charging for access could fundamentally undermine the principles and purpose of PCL – that it is a public good and available to everyone.

⁶ Discussion Document 2.3

Conclusion

WWF New Zealand supports the exploration of access charging for PCL but emphasises that any new charges must be strategically implemented as part of a broader plan for long-term sustainable funding for biodiversity restoration and management. While charging could help generate revenue for conservation efforts, it is not a standalone solution to the chronic underfunding of DOC. WWF stresses the need for substantial government investment in nature, recognising the biodiversity crisis and the critical role of conservation in maintaining New Zealand's environment, economy, and global reputation.

Public access to nature must be preserved, with fees applied sparingly to avoid barriers for low-income individuals and to uphold principles of conservation, equality, and the public good. Any funds collected should be directed toward conservation efforts, and careful consideration must be given to the equity of charging models, ensuring that Māori lands remain freely accessible to mana whenua and historically significant sites remain freely accessible to all. Additionally, WWF highlights potential risks, such as shifting visitor pressures to uncharged sites, administrative burdens, and the commercialisation of natural spaces.

WWF, therefore, advocates for a balanced approach that ensures sustainable funding for conservation while maintaining broad public access to Aotearoa's New Zealand's natural, cultural and historic heritage.