



4 August 2016.

Mark Davies  
Director, operations, western South Island  
Department of Conservation.

Dear Mark,

**Re: Paparoa National Park Management Plan draft**

Federated Mountain Clubs (FMC) was founded in 1931 and advocates for New Zealand's backcountry and outdoor recreation on behalf of 20,000 members. This core function has seen our organisation's close involvement in conservation and recreation planning since its own - and the Department of Conservation's - inception.

FMC welcomes involvement in the development of a fresh management plan for Paparoa National Park (PNP) and is pleased to see elements of our earlier korero with planners included in the draft. In this submission, we comment only on aspects of the draft we would like changed.

In constructing this submission, FMC has referred closely to the principles of the National Parks Act 1980:

**Section 4**

- (1) It is hereby declared that the provisions of this Act shall have effect for the purpose of preserving in perpetuity as national parks, for their intrinsic worth and for the benefit, use, and enjoyment of the public, areas of New Zealand that contain scenery of such distinctive quality, ecological systems, or natural features so beautiful, unique, or scientifically important that their preservation is in the national interest.*
- (2) It is hereby further declared that, having regard to the general purposes specified in subsection (1), national parks shall be so administered and maintained under the provisions of this Act that-*
- (a) they shall be preserved as far as possible in their natural state:*

*(b) except where the authority otherwise determines, the native plants and animals of the parks shall as far as possible be preserved and the introduced plants and animals shall as far as possible be exterminated:*

*(c) sites and objects of archaeological and historical interest shall as far as possible be preserved:*

*(d) their value as soil, water, and forest conservation area shall be maintained:*

*(e) subject to the provisions of this Act and to the imposition of such conditions and restrictions as may be necessary for the preservation of the native plants and animals or for the welfare in general of the parks, the public shall have freedom of entry and access to the parks, so that they may receive in full measure the inspiration, enjoyment, recreation, and other benefits that may be received from mountains, forests, sounds, seacoasts, lakes, rivers, and other natural features.*

FMC expects that the Paparoa National Park Management Plan (PNPMP) will align with the General Policy for National Parks, established under Section 44 of the Act, and with the Act itself, in spirit and resolve. It should also be consistent with the West Coast Conservation Management Strategy, and sections of the Conservation Act 1987 where required.

## **Vision for Paparoa National Park**

FMC questions the inclusion of the sub-section titled “Vision for New Zealand/Aotearoa”, which is focussed on the Department’s Outcomes Model, with its “greatest living space on Earth” vision statement. There is no statutory driver for its inclusion, hence it is an irrelevant consideration; additionally, FMC believes that the Model’s vision statement, lacking the serious far sight required of the nation’s leading conservation agency, is not appropriate for a national park management plan.

### **Recommendations:**

**\* that the sub-section titled “Vision for New Zealand/Aotearoa” be removed.**

## **1. Te Wao Nui**

As referenced in Vision for Paparoa National Park, PNP does indeed have a “unique”, rich history. Much of it is described in Te Wao Nui, but there are substantial gaps also.

In particular, the work of the groups and individuals urging the park’s creation - possibly including the West Coast Accord - should be described and acknowledged appropriately.

The Cave Creek disaster, although occurring marginally outside PNP, is inextricably part of the park’s history. It should be described and acknowledged appropriately.

There is a significant opportunity presented by this plan review to initiate a pathway for inclusion of adjacent conservation areas with appropriate values, under Sections 7 and 8 of the Act. The Journey - the draft’s introductory statement - deliberately sets the matter aside, and Te Wao Nui’s

silence on the work of those who drove the park's establishment - and had advocated for inclusion of a much larger area of national park quality - affirms its marginalisation. This should not be so.

PNP has grown, but is still just one third of the area initially proposed for national park status on the strength of its values. The plan should set out a clear route for redesignation of surrounding conservation land of national park quality. Reclassifications should take place within the new PNPMP's operative life. They may include Bullock Creek Farm Conservation Area, Charleston Conservation Area, the Paparoa Wilderness Area, Tiropahi Ecological Area, the Nile River Conservation Area, or any others.

Climate change is affecting and will affect PNP. DOC, as the nation's leading conservation agency, arguably has an unequal responsibility to take action to reduce contributions to it, and to promote action that reduces contributions to it. This is in keeping with the Act's focus on preservation of natural values present. FMC suggests that DOC should promote low-carbon recreational activity, and actively restrict high-emissions activity in the PNPMP. These intentions and their *raison d'être* should be stated clearly in the plan.

\*\* Unless FMC makes special comment on particular objectives, policies, or milestones in development of or departure from any of the above points, the following recommendations should be applied to all relevant parts of the PNPMP.

**Recommendations:**

- \* **that the work of groups and individuals behind PNP's creation should be appropriately acknowledged in Te Wao Nui.**
- \* **that the story of the Cave Creek disaster should be included in Te Wao Nui.**
- \* **that the PNPMP set a pathway for inclusion of adjacent conservation land of national park quality, with redesignations to take place within its operative life.**
- \* **that the PNPMP take an explicit and active stance on climate change. Low-emissions recreational activity should be actively fostered and high-emissions activity should be actively restricted within PNP.**

## **2. Paparoa National Park - values**

Draft policies use very vague verbs and commit DOC to very little (for example, *Work with, Seek, Deliver conservation messages*). FMC understands the need for some flexibility, but, in general, the plan should be re-worked to express a Departmental attitude of greater resolve to act and achieve measurable results in line with national park principles as set out in the Act.

It is hard to see how core natural and historic conservation action - essential to the principles of the Act - is triggered by this draft plan. Commitment by the Department to performing such fundamental work as pest plant and animal control, monitoring, the study of pest ecology, and the general application of its pool of expertise, is hard to find.

National park values are trivialised by the suggestion that responsibility for a significant quantity of core work should be handed to community groups of uncertain skill and commitment. Such groups and individuals should be made welcome, but the PNPMP should commit the Department unequivocally to the primary care of the park's natural values. Significant decreases in plant and animal pests' ranges and populations should be explicit aims.

Recreation values are catered for adequately only, aside from the obvious example of the Pike<sup>29</sup> proposal. Non-Departmental groups' contributions to recreation opportunities are welcome, but such groups should not be relied on to provide core facilities. For the Department to actively foster recreation will require more than working to "demand" as recreationists generally demand only what is already supplied and known about.

Existing recreational facilities should be properly maintained. The Department should plan for an Inland Pack Track hut, as well as a network of small huts and small, cleared camping areas with basic facilities, to encourage and support low-impact recreation. There should be contingency for timely maintenance for any recreational facilities damaged by extreme weather.

Great care should be taken around business engagement in core conservation activity: DOC has the statutory obligation to look after the national park to stated principles; it is unreasonable to expect many commercial entities to perform, and continue performing, basic conservation functions to high standards in areas other than those where their efforts are visible.

Many groups and individuals not necessarily represented by Ngai Tahu or the West Coast Conservation Board have deep relationships with, and knowledge of, the park. Consultation about activities in PNP should involve any known appropriate groups and individuals as well as Ngai Tahu and the West Coast Conservation Board.

\*\* Unless FMC makes special comment on particular objectives, policies, or milestones in development of or departure from any of the above points, the following recommendations should be applied to all relevant parts of the PNPMP.

**Recommendations:**

- \* **that policies are re-worded to express commitment to extensive action and measurable results benefitting conservation and recreation.**
- \* **that DOC commit to administering core natural values conservation functions in PNP, in line with the principles of the Act, and welcome community groups' assistance over and above that.**
- \* **that DOC commit to significantly decreasing plant and animal pest ranges and populations.**
- \* **that DOC commit to actively maintaining existing recreational facilities, building an Inland Pack Track hut, and developing networks of basic huts and camping areas.**
- \* **that the plan acknowledge and commit to action on DOC's responsibility to national park principles, including provision of recreation opportunities, and welcome appropriate business and other engagement over and above that.**

**\* that consultation about activities in PNP involve known appropriate groups and individuals in addition to Ngai Tahu and the West Coast Conservation Board.**

### **3. General policy for national parks and policy requirements for authorisations and activities**

Policy 3.3 should be clear about what is meant by “restriction”. FMC suggests that “scientific” replace “restricted” where there are scientific grounds for some kind of restriction, and that where caves are gated, permits may be sought; in all other situations, the default position - that caving is permitted - should apply.

Policy 3.3.2 should be changed to reflect the high levels of technical knowledge and understanding of cave systems within the New Zealand Speleological Society (NZSS), the technical knowledge within the New Zealand Alpine Club (NZAC), and that the ability to place protection has a strong influence on safety in caving. All types of protection should be termed “safety anchors”, which should be allowed where they minimise risk to life. FMC proposes appendicising the NZSS’ code of ethics, as well as recreation development guidelines applicable to both caving and climbing (see below pp 5-8) that would be updatable without triggering a plan change.

Policy 3.4 should begin: “Climbing is permitted in Paparoa National Park.” It should be stated that the only exception will be where there is closure to all public access.

If fixed anchor placement for climbing is an issue, then that type of climbing should be distinguished from other aspects of movement through PNP (for example, bouldering or tramping). It should also be acknowledged that this distinction is not necessarily clear-cut or that there is a clear relationship between climbing with fixed anchors and environmental harm, for example, it is possible for there to be little difference between steep tramping and climbing, a route may need very few fixed anchors, and placement of a single fixed anchor may obviate the need for significant vegetation clearance. Policy relating to climbing should show understanding that essential-only fixed anchor placement and minimal environmental impact are fundamental to modern climbing practice.

The capitalised concept ‘Climbing Area’ of Policy 3.4.1 should be removed from the plan, in part because it confuses climbing that uses fixed anchors with climbing per se, but mainly because any attempt to confine climbing with fixed anchors to one part of PNP is unrealistic, with strong potential for users to ignore directives or resort to environmentally-harmful alternatives to fixed anchors.

As the NZAC welcomes involvement in maintenance and development of low-impact climbing, is interested in establishing a separate document working-titled Recreational Development Guidelines (RDG) for appendicising to the PNPMP, and as an independent body cannot be managed in the way Policy 3.4.3 suggests, FMC proposes that policies around climbing be rewritten to address the concerns explained above.

Climbing policy should aim to increase awareness of potential adverse effects of some climbing practices on national park values, including to Ngai Tahu values.

Climbing policy should embrace the RDG which FMC suggests should be co-endorsed by the NZAC, the Department, and Ngai Tahu, and would be reviewable as necessary. A Memorandum of Understanding should specify the scope and endorsement process for the RDG, and the RDG should be publicised and disseminated appropriately and referenced appropriately within the PNPMP (to avoid a change to the RDG being deemed to be an amendment to the PNPMP under the Act).

The PNPMP should separate matters such as “adverse effects of tracks required to access the climbing areas and associated campsites” from climbing activities and deal with them appropriately.

Climbing policy should include monitoring of activities’ effects, provision to remove fixed anchors should adverse effects be considered unacceptable, and provision to consider an area’s closure to fixed anchor placement should adverse effects be considered unacceptable.

FMC strongly urges reconsideration of inclusion of Policy 3.7 and all directives falling from it. Construction and maintenance of tracks suitable for non-powered vehicles (FMC includes e-bikes here) is financially costly. Their engineering means they have a more strongly negative impact on landscape values than tracks developed for walkers and capable of greater consonance with the environment. The uniform hard flatness of tracks suitable for non-powered vehicles also tends to be more jarring and less rewarding for walkers than the surfaces of tracks built to blend with the environment and most suitable for walkers.

If non-powered vehicles are to be allowed to some extent, the only e-bikes allowed should be those whose auxiliary propulsion motors’ combined maximum power output does not exceed 300 watts.

Policy 3.7.1 should put very conservative limits on concession and client numbers for guided mountain biking in PNP. No concessions for mountain bike events on the Pike29 should be granted due to the potential for negative effects on other users’ enjoyment.

To support national park values in PNP, Policy 3.8 should strongly restrict the use of drones.

Assessment of effects of all aircraft activity should occur under policy 3.8; activity tolerance of residents and local, national, and international recreational users should be included as confounding variables in each assessment.

Policy 3.8.1 should be much stronger. Use of aircraft is an unusual privilege in a national park setting and operators should commit to support of national park values, including natural quiet.

Flight paths should avoid known areas of recreational activity such as tracks and huts, and judicial grade global positioning system tracking should be compulsory.

Policy 3.8.2 should be much stronger. If a code of conduct for aircraft operators is worth having, its principles should be deferred to compulsorily, not voluntarily.

Policy 3.8.3(b) should specify judicial grade global positioning systems tracking for aircraft landing concessions; use of aircraft in a national park is an unusual privilege and operators should be able to account for all their activities in PNP.

Policy 3.8.4(b) should specify that any research, monitoring, or collection of material supported by aircraft must be conservation-related; this policy should not be able to be used to allow de facto tourism concessions.

Policy 3.8.4(c) should be for cultural-purposes concessions that are explicitly non-commercial only; this policy should not be able to be used to allow de facto tourism concessions.

Policy 3.8.5(a) should specify a conservative number of aircraft landing concessions, per site, and within the zone, in support of national park values, including natural quiet.

Policy 3.8.7 should not be included as it has high potential to be a default route to unnecessary aircraft concessions where other avenues are closed; degradation of national park values would likely result.

Policies 3.10.1 and 3.10.2 should concern themselves with genuine filming enterprises only; they should not be able to be used to allow de facto tourism concessions.

Policy 3.11.1 should allow only those concessions that are consistent with national park values.

Policy 3.11.2 should allow emergency services aircraft activity only, to support national park values including natural quiet as far as possible.

Policy 3.11.5 should indicate what sanctions or support would ensue from proposed monitoring of any sporting or other competitive events taking place in PNP.

Policy 3.12.5 should retain openness in the PNPMP for admission of animals that have potential to benefit the park, for example, bio-control animals, or tiger worms, which may, in the future, be able to be used in worm farms in PNP to degrade putrescible waste.

Policy 3.15 should explicitly protect the species of juvenile fish known as whitebait, and their habitats.

Policy 3.16 should state explicitly that mining for any material, unless needed for public track and road maintenance, coastal erosion control, or other public construction purposes, in or adjacent to the park, will not be allowed.

Policy 3.18 should state that concessions and permits are part, only, of the solution to wild animals in PNP, and that the Department has the primary duty of reducing wild animal ranges and populations.

A policy should be established for canyoning. It should state: "Canyoning is permitted in Paparoa National Park." The New Zealand Canyoning Association should be acknowledged as the liaison body.

\*\* Unless FMC makes special comment on particular objectives, policies, or milestones in development of or departure from any of the above points, the following recommendation should be applied to all relevant parts of the PNPMP.

**Recommendation:**

**\* that the above proposed actions and alterations to the draft PNPMP be adopted.**

#### **4.1 Nikau Place**

FMC understands the difficulties presented by Bullock Creek Road's vulnerability to extreme weather and its multi-agency maintenance agreement. However, keeping its full length in a usable condition would retain the Mt Bovis walk - rare in the park as a single-day, marked route to a summit - as a one-day trip. The road's present shorter length necessitates an overnight stay for some recreationists climbing Mt Bovis; this can be undesirable for users, and magnifies issues around camping. Maintenance of Bullock Creek Road's full length, including timely restoration after damage by extreme weather, should be negotiated.

Public access to Fox River cave and Xanadu cave should continue, but policy 4.1.9 should not list the caves as they can be dangerous and may be sought by recreationists with inadequate skills.

**Recommendation:**

**\* that the above proposed actions and alterations to the draft PNPMP be adopted.**

#### **4.2 Ti Kouka Place**

The following statements and recommendation are responses to policies 4.2.8, 4.2.9(a), 4.2.9(c), 4.2.11, and 4.2.13 as they stand and take no account of FMC's advice on Policy 3.7 (page 6) or how the Department may choose to use it:

FMC sees no need for Policy 4.2.8 as Policy 3.6.2(a) will allow people with lower fitness to use e-bikes on the Pike29 track. To allow commercial operations to function on the facility would deprive users of the social equality and focus on the land's intrinsic worth that underpin "the distinctive character of recreation in New Zealand national parks" (General Policy for National Parks). Language such as "services" and "opportunities" is semantically devious. Policy 4.2.8 should be removed.

Policies 4.2.9(a) and 4.2.9(c) as they stand would support activity that is abrasive to national park values, particularly natural quiet. They should be rewritten to allow landings at Pike29 huts and the escarpment for conservation management and emergency purposes only.

Policy 4.2.11 would support activity that is abrasive to national park values, particularly natural quiet. Emergency services aircraft activity only should be allowed under this policy.

Policy 4.2.13 should indicate what outcomes would ensue from proposed monitoring of aircraft activity in Ti Kouka Place.

**Recommendation:**

**\* that the above proposed alterations to the draft PNPMP be adopted.**

### **4.3 Manuka Place**

Policy 4.3.3 should be rewritten to allow a concession to function alongside recreational caving requiring permits. The cave is delicate and a level of protection is appropriate, but a private concern should not be essentially given control of Ananui cave to the exclusion of informed and capable recreationists.

Policy 4.3.5 should indicate what sanctions or support would ensue from proposed monitoring of access to cave and karst systems in Manuka Place.

**Recommendation:**

**\* that the above proposed alterations to the draft PNPMP be adopted.**

### **6.1 Milestones**

Milestone 6.1(8) should be that there is "increased abundance and resilience of key species such as taiko (Westland petrel), roroa (great spotted kiwi), and land snails", and not make its achievement dependent on future advances in predator control. The milestone should be reached regardless of the methods used.

Milestone 6.1(11) should state more explicitly what will be achieved, for example, a book, a range of brochures, or updates to DOC's species lists.

It is not for this plan to "benefit local communities" or to say how that might happen, or to assume that communities are in agreement on the nature of benefit. Milestone 6.1(19) should say: "The Great Walk has reached its target visitor numbers. The Department is maintaining the high quality conservation-focussed visitor experience."

FMC appreciates the explicitness of milestone 6.1(22), but suggests that the assumption that all caves in PNP will have been found by 2026 is erroneous. The milestone should be changed accordingly.

Milestone 6.1(28) should be: "The Pike29 Memorial Great Walk is a successful and conservation-focussed experience and valued by visitors."

**Recommendation:**

**\* that the above proposed alterations to the draft PNPMP be adopted.**

## Glossary

The PNPMP's glossary should include: Karst, as it is an important element of PNP; and Federated Mountain Clubs, Native Forests Action Council, and any other groups important to the establishment of PNP, because the fullness of PNP's history - its origins and trajectories - is important, and should be told as accurately as possible

**Recommendation:**

**\* that the above proposed additions to the draft PNPMP be adopted.**

## Appendices

In addition to the NZAC's RDG and the NZSS' code of ethics, any other germane care codes should be appendicised here. The New Zealand Canyoning Association is a new body, at present without such a code; if/when it develops such a code, that code should be appendicised also.

Yours sincerely,

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