



SUBMISSION ON THE MODERNISING CONSERVATION LAND MANAGEMENT DISCUSSION DOCUMENT

TO: Department of Conservation
PO Box 10420, Wellington 6143

Attention: Modernising conservation land management consultation submissions
By email: landlegislation@doc.govt.nz

Name of submitter: **Aotearoa Climbing Access Trust**
Type of submitter: **Not-for-profit organisation**
Release of information: **No part of this submission is confidential**

1. INTRODUCTION

The Aotearoa Climbing Access Trust

- 1.1 Thank you for the opportunity to submit on this process. The Aotearoa Climbing Access Trust ("ACAT") is a national organisation that represents the interests of New Zealand's rock climbing community. Sir Graeme Dingle (KNZM, MBE) is ACAT's patron.
- 1.2 Climbing is a rapidly growing sport in New Zealand and internationally, so much so that it is now part of the Olympic Games and has featured NZ competitors. Climbing is a form of active recreation with positive benefits for mental and physical health and wellbeing. Participation in the sport encourages Kiwis to get out into the great outdoors, connect with nature and community, and stay fit and healthy.
- 1.3 ACAT's purpose is promote public access to rock climbing areas in New Zealand, and to promote conservation and safe and responsible use of the climbing environment.

Structure of this submission

- 1.4 This submission is structured as follows:
 - (a) Recreational climbing in New Zealand's conservation estate (section 2);
 - (b) How conservation land management impacts on rock climbing on PCL (section 3);
 - (c) Key submission points (section 4).

2. RECREATIONAL CLIMBING IN NEW ZEALAND'S CONSERVATION ESTATE

- 2.1 Famous New Zealanders have cemented climbing as part of the New Zealand culture and identity, including Sir Edmund Hillary and in a later generation Sir Graeme Dingle, founder of the Graeme Dingle Foundation (and patron of ACAT) and Lydia Bradey (the first woman to reach the summit of Everest without oxygen).
- 2.2 Thousands of New Zealanders and international tourists climb in New Zealand, and recreational climbing also contributes to the domestic tourism and international tourist industry. Commercial climbing guides that provide safe climbing experiences for tourists to hone their skills in recreational climbing areas.
- 2.3 Climbers, like other recreationalists are also part of conservation efforts on the conservation estate, from tree planting and track maintenance to species identification.
- 2.4 Outdoor rock climbing areas (known as "craggs") are spread across a variety of types of land in New Zealand. This includes public conservation land in National and Forest Parks, Stewardship land, reserves and other crown-owned land, as well as private land including farms and Māori land. Rock climbing does not require significant amounts of public funding, as it generally relies on access to naturally occurring rock features.
- 2.5 However, in many areas of the country, rock climbing is only possible on land administered by DOC. Rights of public access for recreation, and proper management of conservation land, are crucial to the survival and flourishing of the sport in New Zealand.

3. HOW CONSERVATION LAND MANAGEMENT IMPACTS ON ROCK CLIMBING ON PCL

- 3.1 DOC's management of PCL has significant implications for the climbing community. Climbers use public roads and DOC facilities including tracks and huts to access climbing areas. Climbers and other recreationists often have very different needs to those of tourists; we visit PCL more frequently, stay for longer, and venture to more remote areas. The needs of recreationists need to be taken into account – and prioritised – in the management of PCL.
- 3.2 Many climbers also volunteer on recreation and conservation-related initiatives on PCL, such as maintaining tracks, planting native trees and maintaining traplines in the areas around crags. The climbing community is deeply invested in conservation and values good conservation outcomes.
- 3.3 Most importantly, climbing activities on PCL are directly affected by conservation management strategies and plans. Climbing has some associated environmental effects, including the placement of fixed anchors for safety. While these are generally too minor to cause issues, they need to be properly addressed in the relevant planning documents to provide clarity.
- 3.4 Currently, climbing is mentioned in a handful of CMPs and NPMPs in an ad hoc and inconsistent manner, with no national guidance in the higher-level documents. Any issues arising are addressed by regional DOC offices, again with no consistent approach taken to climbing and its effects generally, and no national-level guidance to draw on.
- 3.5 The climbing community has successfully developed positive relationships with DOC, iwi, and other stakeholders in some regions, but the lack of consistency nationally means that we keep having to address the same queries repeatedly, which is challenging for our volunteer network and is a waste of time and resources.

4. KEY SUBMISSION POINTS

- 4.1 We have read the Federated Mountain Clubs' (FMC) excellent submission on the proposals and we endorse the positions taken. FMC has done a great job of assessing the proposals in a well-considered manner and providing high quality feedback, which if implemented, would improve outcomes for conservation and recreation. We strongly encourage DOC to take FMC's recommendations on board and work closely with them throughout the design and implementation process.
- 4.2 We would like to emphasise and expand on the following key points from FMC's submission, as these have significant implications for climbing on PCL:
- (a) We support simplifying the management planning structure by removing layers as set out in the proposals. This will make it easier for the public and small nonprofit organisations like ACAT to engage effectively in conservation management.
 - (b) We oppose removing substantial powers from the NZCA and conservation boards. We agree with FMC that these independent bodies have significant expertise and are crucial to the development of conservation management policy that survives political cycles, ensuring adherence to the conservation-led hierarchy of the Conservation Act.
 - (c) We strongly support FMC's emphasis on the hierarchy of conservation values; first conservation, then recreation, and thirdly tourism. ACAT was deeply involved in consultation on the Milford Opportunities Project, which the current proposals are informed by. It was striking that the first draft of the MOP, which was developed without input from any recreational organisations, contained approximately two references to recreation in the entire plan and did not cater to the needs of recreationists, with almost all of the focus on tourism. In depth engagement with recreation bodies was needed in the later stages to ensure that recreational interests were appropriately considered.
 - (d) Overall, we consider that a greater focus on conservation and recreation, rather than economic activity, is needed in the proposals, in line with the above hierarchy.
 - (e) We support concessions charging processes that provide a fair return to the government, including the competitive allocation processes proposed. ACAT and recreationists are not generally involved directly in concessions processes, but we are concerned to ensure that DOC is well funded to carry out its work supporting conservation and recreation on PCL, and wish to ensure that the effects of concessionaires' activities on the environment are appropriately limited. Keeping economic activity within the conservation estate within strict overall limits and getting the best possible financial return through competitive allocations would be positive for conservation and recreationists.
 - (f) We support the development of national-level guidance documents for specific activities such as climbing. The New Zealand Alpine Club already has a set of high quality documents that are relevant and are frequently referenced in DOC's planning instruments; the Code of Conduct for Rock Climbers, and the Bolting Philosophy and Standards. ACAT also has significant experience in helping to manage climbing-related access issues and a history of developing positive win-win solutions for all stakeholders. We would be happy to work with DOC and Treaty Partners to assist with the development of national guidance for climbing on PCL.

- (g) We strongly oppose the proposed liberalisation of the process for exchanges and disposal of conservation land. These are a significant threat to the integrity of the conservation estate, with poorly defined criteria and insufficient safeguards. Overall, there is a strong likelihood that these proposals would have a detrimental effect on conservation.
- (h) Currently New Zealand, unlike many other countries, has no protections or right of access to wilderness places on private land. Many countries have guaranteed access for recreational, and hunting or gathering activities. In New Zealand this is currently limited to PCL. Any changes that risk limiting this access or reducing the extent of PCL (such as through disposals) should be reconsidered given New Zealand's treasured culture of outdoor adventure, recreation, and connection with nature.
- (i) We support the proposals being properly assessed and amended to factor in the effects of climate change. For example, even areas of conservation that are currently assessed as having low conservation values could make important contributions to the conservation estate as landscapes change in the context of climate-impacted ecosystems and more frequent and violent storms.
- (j) We support FMC (and other recreation bodies) being involved in the design stage of the national-level planning documents. The Milford Opportunities Project experience showed that when independent voices for recreation are excluded from the development of new strategies from the outset, the needs of recreationists tend to be sidelined by a focus on tourism.

Dated at WĀNAKA this 28th day of February 2024

AOTEAROA CLIMBING ACCESS TRUST



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