



Keeping New Zealand Climbing

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Aotearoa Climbing Access Trust Submission on the National Conservation Policy Statement

1. INTRODUCTION

- 1.1 Aotearoa Climbing Access Trust (ACAT) thanks you for the opportunity to comment on the National Conservation Policy Statement (NCPS).
- 1.2 We wish to be heard in support of our submission.
- 1.3 This submission is structured as follows:
 - (a) Executive Summary (section 2)
 - (b) ACAT and our national-level policy work (section 3)
 - (c) The need for a recreation voice in the conservation planning system (section 4)
 - (d) Consultation questions: Directing content of area plans (section 5)

2. EXECUTIVE SUMMARY

- 2.1 The Aotearoa Climbing Access Trust is a national organisation that represents the interests of New Zealand's rock climbing community. It has become an established and effective voice in national recreation policy, including successful interventions to reform health and safety laws in a sensible way that benefits the entire outdoor recreation sector and even DOC.
- 2.2 Our central submission is that outdoor recreation, although given high priority in the Conservation Act and included within the statutory definition of conservation itself, is not adequately represented within the conservation planning system. Unlike conservation values and mana whenua interests, recreation has few statutory avenues for input, is often conflated with tourism under the generic label of 'visitors', and involves specialist knowledge that DOC cannot reasonably be expected to hold in-house for specialised activities such as rock climbing.

- 2.3 National organisations like ACAT are well placed to fill this gap, and we recommend that the NCPS explicitly recognise recreation outcomes and treat national recreation organisations as key stakeholders to be consulted early in the drafting of planning instruments.
- 2.4 Regarding the specific consultation questions on area plans, we consider that visitor zones are not a suitable framework for capturing recreational climbing values or setting related objectives. With this in mind, we recommend that:
- (a) Area plans must (not merely may) describe existing recreational climbing opportunities, developed through adequate consultation with the climbing community; and
 - (b) Area plans should retain the flexibility to set independent recreational objectives even where visitor zones are in place.
- 2.5 Giving effect to these recommendations would allow DOC to better fulfil its statutory function of fostering recreation.

3. ACAT AND OUR NATIONAL-LEVEL POLICY WORK

About ACAT

- 3.1 The Aotearoa Climbing Access Trust is a national organisation and charitable trust that represents the interests of New Zealand's rock climbing community. ACAT works collaboratively with landowners, iwi and public land managers to support sustainable access arrangements that respect both the needs of rock climbers and the people who care for the land. Our work is focused on ensuring that climbing opportunities in our great outdoors remain available not only for today's climbers, but for future generations.
- 3.2 Climbing is a rapidly growing sport in New Zealand and internationally, so much so that it is now in the Olympic Games and has featured NZ competitors. ACAT's purpose is promote public access to rock climbing areas ("craggs") in Aotearoa, and to promote conservation and safe and responsible use of the climbing environment.
- 3.3 The community we serve are a broad demographic of recreational climbers, including families, youth, and adults of all ages and experience levels, who climb throughout Aotearoa and value the opportunity to connect with the natural environment through climbing. We are supported by hundreds of regular donors, alongside volunteers, climbing clubs and industry partners.

ACAT's national role in developing sensible recreation laws

- 3.4 In a short few years, ACAT has established itself as a leader in the recreation sector and a driver of sensible policy and legislation that aligns with DOC's role in fostering recreation.
- 3.5 We intervened in the leading case of *Whakaari Management Limited v WorkSafe NZ* to represent the interests of New Zealand's outdoor community, helping draw the court's attention to the chilling effect that landowners' liability concerns can have on recreational access, which resulted in a positive outcome.

- 3.6 We also instigated and authored a joint recreation-sector call for government action to clearly remove recreational activities from the Health and Safety at Work Act 2015. This was successful and the Health and Safety at Work Amendment Bill, containing an explicit recreation exception, passed into law last week.
- 3.7 These law changes benefit not only climbers but all recreationists and even the Department of Conservation, helping to clarify the Department's functions and set clear limitations on its legal responsibilities.
- 3.8 ACAT also helped to instigate, and we are a member of, the joint submission on the Conservation Amendment Bill made by 10 leading recreation sector organisations.
- 3.9 Our concern is to ensure that recreational interests and values are, in a practical sense, represented in the conservation planning process to an extent that satisfies DOC's statutory role in fostering recreation.

4. THE NEED FOR A RECREATION VOICE IN THE CONSERVATION PLANNING SYSTEM

- 4.1 Recreation is given a high priority level in the Conservation Act. Fostering recreation within the conservation estate is a core function of DOC, and recreation is even included in the definition of conservation itself. Historically however, this priority level has often not been reflected in the conservation planning system – especially in respect of lesser-known activities like rock climbing.
- 4.2 There are some key reasons for this. First, there are few statutory avenues that provide for a recreation voice to participate in the planning process. Conservation values are reliably represented by DOC, as well as Conservation Boards and the Conservation Authority, and iwi authorities are now habitually consulted at any early stage in new planning processes.
- 4.3 By contrast, there are few statutory requirements for consultation with the recreation community. Recreationists are habitually lumped in with tourists and collectively referred to as 'visitors', obscuring a different set of needs and contributions. Our only opportunity for input is usually within public consultation processes, where recreation interests compete with many other voices for attention.
- 4.4 It is also a practical issue of knowledge and expertise. It is unrealistic to expect DOC to have inhouse expertise on the wide variety of recreational activities that are practiced on PCL, from rock climbing to hang gliding. Building this knowledge requires consultation with external people and organisations that have an in-depth understanding of what is involved.
- 4.5 As a result, while the definition of 'conservation' includes "providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations", the recreation community generally considers that DOC does not adequately represent and provide for recreational interests. How could it, if it doesn't even know what we're up to?
- 4.6 As such, providing the recreation community with a voice in the planning system is, in a practical sense, essential to enable DOC to sufficiently carry out its statutory function of fostering recreation.

- 4.7 That is where national organisations like ACAT and the NZ Alpine Club can help. We have relationships with the various climbing clubs and communities in each region and have access to specialist knowledge about the recreational climbing values around Aotearoa. We would be able to provide DOC with high quality information to inform planning processes, such as the creation of Area Plans – if we are given the opportunity.
- 4.8 Undertaking consultation with the recreation community is not something DOC should be concerned about. In most cases it would be very light touch, as recreationists (unlike tourists) are generally self-sufficient in the outdoors and just want to be left alone to get on with it. In some cases, however, there are genuine issues that need to be addressed, and there need to be pathways for engagement and input.
- 4.9 To enable better outcomes, we recommend that:
- (a) Recreation outcomes be explicitly recognised within the NCPS;
 - (b) National-level recreation organisations like ACAT be treated as key stakeholders in respect of PCL and be consulted regarding recreational values and aspirations at an early stage in the drafting of planning instruments.
- 4.10 How these recommendations can be achieved through the NCPS is addressed through our response to the consultation document questions below.

5. CONSULTATION QUESTIONS: DIRECTING CONTENT OF AREA PLANS

Consultation question 1: Is there additional content you believe should be included or removed within area plans?

- 5.1 Area plans must adequately identify recreational rock climbing values and opportunities, or include a process for such values to be identified and taken into account in decision-making. This is not currently provided for in the Bill or the NCPS, and there is an opportunity to strengthen the planning framework to achieve this outcome.
- 5.2 On page 13 of the NCPS Consultation Document, paragraph 16 states:

16. Area plans may describe existing recreational opportunities within public conservation lands and waters.

Recreational opportunities and visitor zones

Recreational values and objectives are broadly covered by visitor zones (see more detail below), but area plans would be able to describe recreational opportunities to allow for a finer scale of values to inform place-based decisions. These values can also inform the mapping of visitor zones within an area.

[Emphasis added]

- 5.3 We recommend:
- (a) Changing ‘may’ to ‘must’ in the above policy; and

- (b) Ensuring that the Area Plan drafting process includes adequate opportunities for the climbing community to provide information about existing recreational opportunities.
- 5.4 Our current set of planning documents do not recognise recreational rock climbing values (with a handful of exceptions). There are around 400 individual crags in New Zealand, many of which are located on PCL.
- 5.5 Some of these crags on PCL are unique rock climbing taonga of unparalleled quality, such as the world-class boulder fields in Kura Tāwhiti - Castle Hill Basin, or the adventurous crags scattered through the Darran Mountains in Fiordland. These places are treasured by the NZ climbing community and are coveted destinations for visiting international climbers.
- 5.6 Only a handful of crags are noted in National Park Management Plans and other official documents, usually as a result of consultation with the New Zealand Alpine Club when the plans were written 20 or 30 years ago. These are sorely in need of an update and the process for creating Area Plans must ensure adequate consultation with the recreational climbing community. Information about recreational climbing values is not held by DOC, so consultation with climbers is the only way that this information can find its way into the planning framework.
- 5.7 Failure to include this information could marginalise the burgeoning sport of rock climbing in significant ways:
 - (a) Lack of recognition of recreational rock climbing values around NZ renders the sport invisible to decision-makers, in contrast to its exploding popularity;
 - (b) Visitor zones may not be correctly located if traffic to popular crags is not considered;
 - (c) Recreational objectives in Area Plans may not appropriately reflect the values present.
- 5.8 Additionally, failure to include recreationists in the planning system is a lost opportunity for DOC to facilitate direct, mutually beneficial relationships between us and mana whenua.

Consultation question 2: Do you have views on any transitional policies for area plans that should be considered?

- 5.9 On page 13 of the NCPS Consultation Document, paragraph 19 states that:

19. Area plans may set recreational objectives unless the area plan includes visitor zones.

The relationship between values, threats, and objectives

Objectives must be set in area plans to guide the Department's decision-making, particularly in relation to authorisations.

Objectives would be high-level and based on the values and threats identified at place. Objectives cannot direct the Department's operational activities (but may be considered).

Visitor zones would set recreational objectives. Implementation arrangements are still being worked through, and it may take some time for visitor zones to be fully

operational. To bridge the potential gap, policy 19 allows area plans to set recreational objectives until that area plan has visitor zones.

[Emphasis added]

- 5.10 We recommend preserving the flexibility for Area Plans to set independent recreational objectives even if the plan includes visitor zones.
- 5.11 Recreational rock climbing values will not be adequately reflected by visitor zones, and attempting to set any relevant objectives through the lens of these zones will unnecessarily complicate the plans.
- 5.12 The nature of rock climbing does not generally change based on its proximity to a road. It varies based on the nature of the cliff; for example, traditional climbing using removable pieces of safety gear will be practiced at cliffs where there are adequate cracks and fissures to accommodate the gear, whereas permanent, fixed safety gear will be required on cliffs that lack such cracks and fissures. The type of rock dictates the experience, and the cliff does not care whether it is in a high or low visitor zone.
- 5.13 If an objective in respect of rock climbing were required in an area plan, it would be simpler to apply a single objective across the entire area.

Consultation question 3: Do you have any feedback on the proposed approach to developing visitor zones?

- 5.14 As above, visitor zones are not a good way to establish recreational values and objectives for rock climbing. Other low-traffic, highly specialized activities that revolve around specific natural features, such as canyoning or caving, are likely to be similar.
- 5.15 As recreationists, we go where the natural features are. These activities and locations are often not on DOC's radar, as they are spread widely across the conservation estate instead of concentrated around great walks or tourist attractions.
- 5.16 Rock climbers do not require significant infrastructure to be provided to us, although we will use tracks and huts where these are available.
- 5.17 Rock climbing does require some limited infrastructure such as fixed safety anchors (bolts and other fixtures), which are placed and maintained by climbers and enable our activities to be conducted safely. The need for such equipment arises (or not) based on the nature of the rock, and visitor zones will be irrelevant to this analysis.
- 5.18 As above, we recommend that Area Plans preserve the ability to record recreational values and objectives independently of the visitor zones.

Dated at WĀNAKA this 9th day of July 2026

AOTEAROA CLIMBING ACCESS TRUST



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