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ADMINISTRATION OF COMMERCIAL RECREATION
IN THE SOUTH ISLAND MOUNTAINLANDS:
A CASE STUDY OF THE UPPER WAITAKI

Presented in partial fulfilment of the requirements for the Degree of Master of Science in the University of Canterbury

by

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ABSTRACT

Outdoor recreational activities constitute a major use of the South Island mountain lands. The commercial recreational industry has a key role in servicing the needs of both overseas and New Zealand recreationists. The industry has experienced rapid growth in the past and has the potential for further growth. At present the administrative framework within which the industry operates is in some aspects a source of dissatisfaction to both the industry and administrators alike.

This study principally identifies issues of controversy stemming from current administrative policy and practice. The development of the study requires a comprehensive review of existing commercial operations within the industry, something that has not previously been undertaken. The study also has involved the setting down of the major features of existing policy and administrative practice. This has been undertaken at two levels.

Part One of the study identifies the principal administrative issues facing the industry. An overview is presented of both services provided by, and public administration of, commercial recreational enterprises in the South Island mountain lands. From the overview the industry emerges as already extremely diverse in character and expanding in overall scale and complexity. Public sector administration of the industry appears as exceedingly generalized, piecemeal and, in many regards, failing to keep abreast of the industry's development.

In Part Two issues of possible controversy raised by the overview are subject to detailed examination in the context of a case study. They are assessed by means of detailed personal interviews with people directly involved in either administering or operating commercial recreational enterprises within the Upper Waitaki Basin. Interview results indicate that five administrative issues in particular stand out both as having policy implications and requiring further administrative attention. The issues are:

- the level of co-ordination and representation of all bodies involved in the industry;
- the extent of administrative involvement in regulating particular aspects of the industry;
- the establishment of length of licence tenure;
- the setting of licence fees; and,
- the consideration of respective rights of commercial and private recreationists, particularly in regard to public facility use.

The study concludes by identifying guidelines against which both existing and developing administrative policy might be reviewed.
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CHAPTER ONE

INTRODUCTION

The South Island mountain lands provide the people of New Zealand with a multiple use resource. One important use of mountain lands is as a setting for outdoor recreational activities. Increasingly, recreationists from both within and beyond New Zealand are taking advantage of services provided by a broad range of commercial recreational enterprises. Provision of commercial services generates substantial economic and social benefits. At the same time, commercial services have the potential to negatively affect the physical environment, private recreationists and other users of the mountain land resource.

At present, administration of commercial recreational enterprises by the many agencies involved appears less than optimal. Effective administration requires both the promotion and regulation of the industry so that its social and economic benefits are maximized, and any negative effects and conflicts are minimized respectively. Minimization of the resources expended in the administrative process is another prerequisite of effective administration. There are indications that none of these broad administrative goals are being fully realised at present.

Difficulties in administration of commercial recreation in the South Island mountain lands appear to be a consequence of three contributory factors: - there has been a lack of research and thus lack of knowledge concerning the industry's characteristics and the consequent management implications; - the diverse, complex and changing nature of the industry itself; and, - the complexity and fragmentation of administrative control.

Current administration of the commercial recreational industry is, therefore,
the central focus of the study.

Effective administration of any industry must be founded upon detailed understanding of the industry, together with an appreciation of its problems and possibilities at any point in time. Due to the paucity of existing research on commercial recreational ventures, the secondary focus of the study thus has been to outline the scope and nature of the industry. Specifically, descriptive facts and figures have been sought which provide an overview of the current structure of the industry and the trends within it. Attention also has been paid to the identification of existing and potential impacts and conflicts generated by the industry that may be of administrative significance.

The study has been conducted at two levels (Figure 1). Part One represents a general overview of both commercial recreational administration and of those commercial recreational services located throughout the South Island mountain lands which are provided primarily outdoors and off road. More specifically, Part One discusses the mountain land setting, changing trends in the recreative market, general features of the commercial recreational industry and relevant administrative legislation and policy directives.

The overview of the industry and its administration developed in Part One provides a background to the second phase of the study. From Part One the administrative issues that appear to be significant are carried over into an assessment of the interplay between the commercial recreational industry and its administration in a case study situation. A suitable location for such a study, containing a representative range of commercial recreational enterprises, was found in the Upper Waitaki basin.

In the Upper Waitaki case study, apparent administrative issues are consid-
# INTRODUCTION
Chapter One

## PART ONE: SOUTH ISLAND MOUNTAIN LANDS OVERVIEW

### The Resource Base

- Chapter Two: the mountain lands setting
- Chapter Three: the recreative market

### The Industry

- Chapter Four: overview of the commercial recreational industry

### Current Administration

- Chapter Five: national to local level administration of the industry

### Main Sources:
- Publicity information published by the Tourist and Publicity Department and the industry
- Policy directives and legislation
- Existing literature

## PART TWO: UPPER WAITAKI CASE STUDY

### The Case Study

- Chapter Six: the case study and its setting

### The Interview Schedule and Responses Generated

- Chapter Seven: characteristics of the Upper Waitaki industry
- Chapter Eight: administrative issues associated with the industry

### Issues and Implications

- Chapter Nine: administrative issues and implications

### Main Sources:
- Interviews with key personnel
- Interviews with key personnel and existing literature

# CONCLUSION
Chapter Ten

*Figure 1: The Study Format*
administration of the industry and the operation of commercial recreational ventures. At the same time a data base on the current structure of the industry was assembled. Both the descriptive data base and the discussion of personal perspectives on administrative issues facing the industry were prepared from wide-ranging interviews with industry and administrative personnel.

Those administrative issues which proved to be of particular controversy from this primary research are then examined further. Finally, tentative recommendations are made for possible incorporation into future administration of the industry.
PART ONE: SOUTH ISLAND MOUNTAIN LANDS OVERVIEW

CHAPTER TWO

THE SOUTH ISLAND MOUNTAIN LANDS

2.1 INTRODUCTION

The South Island mountain lands constitute the resource on which the commercial recreational industry is founded. At the same time, its physical and social characteristics account for many of the boundary limitations within which the industry must operate. It is therefore worthwhile to outline the features of this environment.

The South Island mountain land designation is interpreted in Figure 2 and its general features are outlined below.

2.2 PHYSICAL CHARACTERISTICS

South Island mountain lands constitute a resource of very great scenic and recreational value. At the same time it is a harsh environment of physical extremes. The landscape is dominated by the Southern Alps. This mountain range, which runs the entire length of the South Island, varies considerably in topography - from block, to steep faced, angular mountain peaks. Between the ranges are large inter-montane basins, braided river valleys, river gorges and glacial formed lakes and fiords.

The ranges influence a climate characterized by extremes. They transect the path of the prevailing wind. Consequently, a sharply falling rainfall gradient from west to east characterizes annual precipitation patterns. The temperature regime is generally sub-continental. Winters, therefore,
Figure 2: South Island Mountain Lands

(Author's interpretation derived from the research of Smith, Davison and Geden, 1980.)
are usually severe and even during the summer period warm days of up to 35°C are punctuated with very cold periods (Molloy, 1980). A high prevalence of strong gusty winds is another predominant feature of the climate.

Mountain land soils correspond closely with the topography and climatic factors. They tend to be weakly weathered and of low to medium fertility. They are usually very susceptible to erosion and are therefore of low potential productivity (Molloy, 1980).

The vegetation cover reflects an ecological balance with the physical factors (and in some cases, human intervention). It varies from open tussock grasslands in the extensive lower rainfall eastern zone, to alpine barrens in the high altitudinal areas and rain forests in the per-humid western zone.

As a result of these physical factors, use of the resource requires both foresight and sensitivity.

2.3 LAND USES AND SOCIAL CHARACTERISTICS

The commercial recreational industry utilizes the mountain lands resource, outlined above, in conjunction with other uses. The most significant land uses with which the industry must work in conjunction are: pastoral farming; nature conservation; hydro-electric power generation; and, non-commercial recreational uses. Production forestry and agriculture also are developing into significant land users in some areas. In most instances the commercial recreational industry resource requirements overlap those of other users. It has the potential, therefore, to both positively and negatively affect such users, (Appendix 4). To an extent,
these other users contribute to the limitations within which the industry must work. At the same time, the total range of mountain land uses together produce the social environment with which the commercial recreation industry is associated.

The mountain land social environment is characterized by a very small scale and isolated population. Most of the area is either uninhabited, or settled by a very sparse, low density rural population. These rural inhabitants are associated mostly with extensive pastoral farming uses and are thus located at run homesteads. This low density rural pattern is interspersed with service centres which range in size from the very small, to larger centres such as Wanaka and Queenstown.

Many of the larger centres have developed in recent decades due to either hydro-construction developments, or more usually, growth of the recreational market. Both hydro-construction and recreational developments have influenced the social environment considerably, due to the increased number of people drawn to the area in pursuit of employment opportunities. Increased population numbers have resulted in both community services and the infrastructure being improved.

However, despite these changes, commercial enterprises are faced with both the benefits and limitations of operating in a social environment which generally is characterized by isolation and low density of population.

Both of these social features, together with the physical features previously outlined, govern the form of the present industry to a considerable extent.
CHAPTER THREE

THE RECREATIONAL MARKET

3.1 INTRODUCTION

In establishing a commercial recreational venture, the prospective operator's principle objective is the achievement of profitability. This prospect is dependent to a considerable degree on market demand. Through an understanding of market demand trends, therefore, administrative agencies are able to anticipate changes in the commercial recreational industry itself. A capacity to anticipate developments can be an advantage in the administering of the industry. Consequently, in the sections that follow general trends in recreative use of the South Island mountain lands are outlined. Most current background sources of information on recreative uses treat overseas and domestic recreationists separately. Regretably, therefore, it has been necessary to adopt this division in the outline that follows.

3.2 RECREATIONAL MARKET TRENDS - OVERSEAS USERS

Overseas recreationists constitute a considerable proportion of the market for many commercial enterprises. Consequently, changing trends in the use of the South Island mountain lands by overseas visitors has a significant influence on the industry. Three types of trends in the overseas recreational market are now considered:

- change in overall visitor numbers;
- change in nationality; and,
- changes in the relative popularity of different forms of holidays.

In the last few years overall growth rates in total overseas visitor
numbers have been declining. The half million arrivals last year represented only a two percent increase over 1981 figures. This slow growth rate is in marked contrast to the average fifteen percent increase per annum experienced between the 1960 and the late 1970's (Tourist and Publicity Department, 1982). The relative proportion of different nationalities contributing to this figure also are changing. These trends can be summarized as follows:

- Australians account for forty percent of international visitors, but growth in this sector is minimal;
- North American visitors account for twenty percent of the market and this sector is experiencing gradual expansion;
- Asian visitors are rapidly increasing in number and their market share is now thirteen percent; and,
- the Western European sector is experiencing a steady growth rate. Its market share is currently also thirteen percent.

(Tourist and Publicity Department, 1982)

These trends are very important for the commercial recreational industry due to the association between visitor nationality and different travel characteristics. Japanese and South East Asian tourists are characterized by high rates of expenditure per day, trips of very short duration and a strong preference for highly organized group travel. Both nationalities consequently tend to have very little time available for impromptu use of commercial recreational activities. Australians, in comparison, tend to favour economy coach tours of much longer duration. The travel patterns of North Americans and West Europeans fall somewhere between the two extremes.

Trends also are occurring in the relative popularity of different holiday forms. With the exception of Asian recreationists, there recently has been
Significant trends towards:
- more flexible independent travel arrangements;
  and,
- 'adventure' package holidays.

The increasing number of independent travellers is of considerable interest to the commercial sector, as a consequence of both their higher degree of discretionary spending and more flexible travelling schedules. The independent traveller, therefore has comparatively more opportunities in which to engage in activities such as guided tramping, heli-skiing and raft trips.

The changing trend within the tour market (towards more 'adventure' holiday packages) is having a considerable influence on associated commercial operations. The influence is mainly attributable to the large scale of the organized and 'pre-paid' tour sector. The most rapid increase has been in winter skiing packages. However, action holidays incorporating other outdoor recreational uses also are becoming increasingly popular.

These trends suggest that those international sectors on which the commercial recreational industry services are dependent, are increasing at a much more rapid rate than the international tourist market generally. This especially reflects the recent trends towards independent travel and 'adventure' holidays. It also appears likely that these trends will continue. On this basis, the most rapid growth rates can be expected in those commercial recreational enterprises that service primarily the independent travel and 'adventure' markets.
RECREATIONAL MARKET TRENDS - DOMESTIC USERS

The domestic recreational market is of considerable importance for many commercial recreational sectors, as a result of both its substantial size and its proximity to the mountain land resource. The general significance of this market has only been appreciated recently by marketing and administrative agencies. Little information therefore is available on current trends and patterns amongst domestic users.

However, some approximate trends can be identified from a comparison of the nationwide New Zealand Recreational Survey (Robb and Howorth, 1977), conducted in 1975, and the New Zealand Forest Service four centres study (Murphy, 1981), conducted from 1979 to 1980. Trends apparent from a comparison of the two reports, together with additional research contributed by Aukerman and Davison (1980), provide an indication of those domestic recreational trends which are related to use of the South Island mountain lands. From this comparison three trends emerge which are of particular significance to the commercial recreational industry.

The three trends are:

- outdoor recreational activities in general are increasing in popularity;
- informal recreational activities are growing at the expense of more formalized activities such as sport; and,
- of the activities engaged in on an informal basis, those which require active participation are experiencing the most rapid increase (eg skiing, canoeing, tramping).

(Aukerman and Davison, 1980; New Zealand Council for Recreation and Sport, 1982)

The three trends are of importance for the commercial recreational industry located in the mountain lands because in a number of the more active
pursuits, domestic recreationists are dependent on its services. Dependence on commercially offered services reflects the inherent requirements of many active mountain land pursuits. Many of the activities currently engaged in such as ski touring, rafting and mountain climbing require the provision of specialized equipment and considerable expertise. Some activities also require access by sophisticated modes of travel such as helicopters and fixed wing aircraft.

The commercial recreational industry as a result is associated with the domestic recreational sector experiencing the most rapid growth. It thus appears likely that those commercial enterprises servicing the active, outdoor domestic recreational market are likely to continue expanding in the near future.
CHAPTER FOUR

AN OVERVIEW OF THE COMMERCIAL RECREATIONAL INDUSTRY

4.1 INTRODUCTION

The commercial recreational industry, in its many diverse forms, is an integral part of recreational uses in the South Island mountain lands. A review is presented in this chapter of those commercial recreational operations which are provided at sites that are primarily off-road and outdoors. Not included in the review are accommodation and associated facilities, indoor recreational services and on-road transport services. The exclusion of these has enabled the more active and more directly resource related pursuits to be given due attention.

4.2 BACKGROUND INFORMATION SOURCES

To date there has been very limited research completed on the commercial recreational industry. Therefore, due to the general paucity of background research, this chapter has been based on primary data. Material published by the Tourist and Publicity Department and the commercial operators represents the major data source. This background information has been both cross-checked and augmented (where possible) by informal interviews with knowledgeable individuals. These individuals include government employees, 'locals', and a number of operators.

4.3 OUTLINE

The following section introduces a brief overview of the features characterizing the commercial recreational industry. It is based upon sources identified above. Detailed information on which this section is based is
presented in Appendices 3 and 4. In Appendix 3, all identified commercial recreational ventures are grouped according to activities offered. The activity sectors tend to share certain common characteristics in regard to description, scale, development ... etc. In Appendix 4, those characteristics are considered on a sector, by sector, basis. The same characteristics are discussed in this chapter, but both in more general terms and in relation to the industry as a whole.

4.3.1 Description

Commercial recreational enterprises offering services in the South Island mountain lands are highly diverse in nature. Examples of their scope include hot air ballooning, farm tours, down hill skiing, and hydrofoil trips. Consequently, both the inherent characteristics of the operations and some of the associated effects usually are very different. The extreme diversity of the industry, and the implications of that diversity, is a major theme that will be developed in this study.

Despite its diversity, however, the industry does show certain overall similarities. Examples include:

- the very high labour content of all operations;
- the seasonality of most operations;
- their general ability to earn overseas funds; and
- the extent of ties of ownership and operation between enterprises.

The high degree of inter-relationship between the enterprises reflects the complimentary nature of many of the services offered and the overlap in market segments being serviced.

4.3.2 Scale

Enterprises range from multi-million dollar developments catering for
thousands of recreationists annually to part time, seasonal services catering for a few groups of users. In some sectors such as scenic flights and launch cruises, a semi-monopoly situation exists effectively, due to domination of the market by large scale operations. In other services - fishing, jet boating and mountain climbing - enterprises tend to be both smaller and of a much more uniform size.

4.3.3 Development

The industry has a long history. Services such as guided climbing, skiing, walking, and launch trips were first established in the early 1900's. Substantial development of these more traditional activities has occurred, along with significant expansion into a wider range of services. The period of most rapid expansion was during the mid 1960's, to late 1970's, reflecting the correspondingly rapid development of international tourism at that time. More recently, expansion and growth of the industry has continued, but at a decreased rate. The one exception is the skiing sector which is still experiencing rapid development.

4.3.4 Location

Commercial services are offered at scattered locations. Patterns do exist, however, as some services are located adjacent to their physical resource requirements (eg skiing, mountain climbing enterprises). The establishment of other services is more strongly influenced by the siting of tourist servicing centres.

The majority of services are located on Crown lands. Usually, there exists a relationship between the type of service offered and the land designation involved. For example, the major climbing schools and scenic flight operations are based in national park areas, whereas guaranteed hunting operations are located on pastoral lease designations.
4.3.5 Licences

Many commercial operations hold recreational licences with one of two administrative agencies - the Department of Lands and Survey, or the New Zealand Forest Service. Operations based on either navigable waterways, or free hold land, are outside the general jurisdiction of the two land administering authorities.

The Ministry of Transport is responsible for licensing all boats over 4.87 metres and also for administering a range of other land and air service vehicle licences. All enterprises involving craft under this length are not licensed.

Many of the small scale services in other recreative sectors also are not licensed. Common examples include casual fishing and hunting guide services.

In specific sectors a range of other permits and approvals may be associated (Chapter Five).

4.3.6 Ownership

Ownership of commercial enterprises usually is highly correlated with scale factors. Public companies tend to own the larger enterprises and the smaller scale services are usually controlled by either private companies, or run as less structured, owner-operator enterprises. However, exceptions do exist as some larger companies also are privately owned.

The degree of foreign ownership in the commercial recreational industry currently is very small - Cecil Peak Station is the only example noted.
4.3.7 Facilities
Most operations require set facilities. The facilities required, which can include air strips, hut accommodation and wharves, are usually owned by the operators. However, in a few cases public facilities are used. Both climbing schools and some of the smaller scale trekking operations, for example, rely on public huts for overnight accommodation.

4.3.8 Impacts
Environmental and socio-economic impacts associated with the recreational enterprises correspond with the type, scale and concentration of services being offered (Appendix 4). Policy directives of national and local level administrative agencies also influence the effects of different enterprises.

In the chapter which follows, the respective roles of administrative agencies with responsibilities in the industry are discussed.
5.1 INTRODUCTION

The current character of the commercial recreational industry reflects in part the application of administrative policies. It is therefore important to understand basic intentions and implementation of relevant policies, before proceeding to an examination of the administrative issues introduced by the Upper Waitaki case study.

Most commercial recreational enterprises are located on Crown Land. Four central governmental agencies are responsible for their administration: the Land Settlement Board; National Parks and Reserves Authority; New Zealand Forest Service; and, the National Water and Soil Conservation Organization. The policies formulated by the Ministry of Transport and the Air Services Licensing Authority also influence the activities of some operations. The Ministry of Agriculture and Fisheries and the Wildlife Division, Department of Internal Affairs are also involved when fisheries and wildlife resources are involved.

Joint policy statements have been produced by two or more agencies when areas of responsibility overlap. Two examples are the Department of Lands and Survey and the New Zealand Forest Service joint policies on ski field development and wilderness areas. Joint policies have not been reviewed because their basic concepts are incorporated into the general policy statements of each agency (Appendix 5).
policies are usually implemented by national agencies as licence, permit or lease agreements. Recreational leases are generally issued for very limited and specific areas (e.g. building sites), because a lease agreement gives the leasee exclusive rights to the land concerned. The associated public access restrictions often conflict with other policy objectives of the management body. With a licence or permit, the holder is granted authority to carry out an activity mutually agreed to by the licencee and the licensing body. Usually, non-exclusive rights are given, some form of fee is involved and stipulations are included regarding scale and areas of operation, public safety and environmental protection.

At the regional and district levels many territorial and ad hoc authorities also have important administrative roles which affect the industry. In the Upper Waitaki case study area three authorities currently are responsible for regional and district planning: the Waitaki Catchment Commission and Regional Water Board; and, the MacKenzie and Waitaki County Councils (Appendix 5). The Waitaki Catchment Commission and Regional Water Board has an indirect statutory responsibility for some commercial recreational activities, under the Soil Conservation and Rivers Control Act (1941) and the Water and Soil Conservation Act (1967). Under this legislation the Board influences commercial developments by stipulating standards with regard to soil and water values and by providing advisory services for both entrepreneurs and the land administrative authorities. The District Councils influence the commercial sector by stating in their respective district schemes both which areas and under what conditions activities can be undertaken. When facilities are required with the recreational enterprises, additional permits and consents also have to be obtained from the Councils.

The administrative role and policy objectives of both national and local
level agencies will now be reviewed in greater detail. However, it first needs to be stressed that these agencies are themselves influenced by the attitudes and directives of many other governmental agencies, local authorities and special interest groups. The main groups with supplementary management and advisory roles in commercial recreation are listed in Appendix 6.

5.2 NATIONAL LEVEL ADMINISTRATION - SOUTH ISLAND MOUNTAIN LANDS

5.2.1 Introduction

National level administration of the commercial recreational industry is the responsibility of both central Government and a range of authorities with jurisdiction in land, soil and water, transportation and wildlife management. The main authorities involved in the actual issuing of recreative licences are: the Land Settlement Board; National Parks and Reserves Authority; and, the New Zealand Forest Service. Other national level agencies with an administrative and monitoring role in the industry are: the National Water and Soil Conservation Organization; Ministry of Transport; Air Services Licensing Authority; Ministry of Agriculture and Fisheries; and, the Wildlife Division of the Department of Internal Affairs.

The particular involvement of Government and each of these national level agencies is now outlined.

5.2.2 The New Zealand Government

The New Zealand Government administers the commercial recreational industry through its departments and agencies. By endorsing the policy statement entitled "Deciding The Use Of High Mountain Resources" (Department of Lands and Survey, 1979), Government has provided overall guidelines for future land use administration in this area. With regard to recreation and
tourism this statement directed that all future policies should address two goals:

- "To seek fulfillment of human needs and aspirations for a wide variety of types of mountain based recreation, passive and active" (S.7.a); and,
- "To provide for the carefully controlled development of the tourist industry appropriate to the mountains and contributing to the national economy" (S.2.7.b), (Department of Lands and Survey, 1979).

Government is clearly advocating that a wide range of recreative developments should be allowed as long as they are both in keeping with the mountain environment and contribute to the national economy.

5.2.3 The Land Settlement Board

The Land Settlement Board is serviced by the Department of Lands and Survey. It is responsible under the Land Act (1948) for the administration of leased and unalienated Crown Land areas.

Traditionally it has shown little interest in recreative uses of the mountain areas under its jurisdiction. However the developing controversy in the early 1970's over the establishment of safari hunting, ski fields and other tourist operations on pastoral leases, coupled with pressure for clarification of the Board's policy on the future use of areas retired from grazing has led to more recent policy statements incorporating tourism and recreative references (Molloy, 1977).

In "High Country Policy", published in 1980, the Board set out goals and specific policies which relate to both general tourism and recreation, and to two particular recreative sectors - safari hunting and skiing operations.

The pastoral bias in the Board's approach to recreation and tourism is very
apparent in its policy requirements. This is demonstrated by the Board
making it a possible prerequisite to the granting of a recreational permit,
that any land held under pastoral lease or occupation licence be surrendered
if unsuitable for grazing (S.20.3.b).

When referring to commercial recreational developments, the Board stresses
the importance of protecting public safety, natural values and soil
conservation and water management (S.20.3.b). To ensure this is done
for ski field developments, the Board states that all applications must be
accompanied by a suitable environmental impact assessment and it expects
satisfactory arrangements to be made for public health, public safety,
soil conservation and water management requirements, landscape aesthetics,
and financial aspects (S.20.5.b).

The Board also attempts to balance general rights of public access with the
entrepreneurs' needs for an equitable return. To protect recreationists
not wanting to use commercially provided services in an area, it
stipulates that "Any special lease approved will be granted only over
an area sufficient for building purposes, and easements will be granted
to provide access, for ski tows, for ancillary equipment, etc. ..."
(S.20.3.c). With the single exception of safari hunting which requires
exclusive rights to an area, this policy applies to all recreational
ventures.

The Board clearly specifies that all recreational developments will be
charged for their use of public lands. It suggests that fees could be
assessed according to the merits of each case, apart from ski fields which
should be levied a percentage of average gross revenue earnings. With
respect to leasehold areas this policy is inconsistent because alternative
forms of farm diversification are not levied (e.g. forestry).
The brief overview of Land Settlement Board policy is based on policy statements which vary considerably in detail, contain notable omissions and are generally lacking in clarity. The inclusion and content of the policy section entitled "Recreation and Tourism" does, however, imply that the Board is beginning to take a more active role in managing recreational enterprises located on unalienated and leasehold areas.

5.2.4 The National Parks and Reserves Authority

This Authority is serviced by the Department of Lands and Survey. It is responsible under the National Parks Act, 1980 and the Reserves Act, 1977 for policy formulation in national parks and reserves. The two recent acts provide a completely new basis for management of both areas. Park and reserve administration is now the direct responsibility of the Department of Lands and Survey and the National Parks Concession Policy, 1970, no longer applies to commercial recreational developments.

A new draft general policy for national parks is now available. It provisionally sets out future guidelines for commercial recreational administration. A companion volume to cover areas with a reserve designation has not yet been prepared.

The 1982 draft policy reaffirms that the main aim of national park administration is to achieve an appropriate balance between, "preservation in perpetuity" and "public access and enjoyment" (S.4., National Parks Act, 1980), but these two concepts are never actually incorporated as policy statements. It then details certain policies, some of which are of direct relevance to commercial recreative enterprises. In the section entitled "Commercial Concessions", the Authority emphasizes that "while a paramount consideration is the right of park users to appreciate and enjoy national parks, the means of doing so and the facilities to be provided, necessarily
need to be related to the sensitivity of the environment ..." (S.25.0). It therefore stipulates that developments must conform to the park management plan. They must "be in harmony with the predominant park values and protect the environment ... to the greatest degree possible ..." (S.25.1). Ensuring visitor safety and comfort are also stressed in introductory comments to the policy section. The Authority also states that applications for licences must be supported with full proposal details including previous experience, bank references, and an assessment of the economic viability of the proposal. Multiple concessions for the same or similar activity generally will not be granted and an opportunity to expand existing facilities should be given first to the incumbent operator.

Many other references in this policy are also relevant to the commercial sector. With regard to "Aircraft and Airspace", the Authority emphasizes the need to balance the benefits of scenic flights with the adverse noise effects produced. Higher minimum flight attitude over wilderness and specially protected areas, limited number and location of landing places, and the prohibition of airdrops and recreational landings in wilderness and special purpose areas are therefore proposed. In this draft policy the Authority also makes the significant stipulation that wherever possible concessionaires should be accommodated outside the park areas.

This brief review shows that the National Parks and Reserves Authority is developing some quite definite policies on various aspects of concessionaire management. At the same time the draft document fails to address many central management questions - for example, what forms of recreative developments are appropriate in national parks? Questions such as this assume very real relevance when the Authority stresses factors like ensuring visitor "comfort" (S.25.0). Many aspects of the policy statement
are also very generally phrased. With regard to concessionaires few distinctions are made between: commercial recreational facilities; commercial recreational services; resident concessionaires; and, non-resident concessionaires, yet there are very different management implications associated with each category.

5.2.5 New Zealand Forest Service

Forest Service recreational responsibilities in the mountain lands fall into two categories: those which operate irrespective of tenure, and those related only to state forest areas. Under the Wild Animal Control Act, 1977, the service is responsible for regulating recreative hunting operations on all land tenures. Safari hunting operations are permitted by this statute, providing both the relevant land owners grant permission and a hunting permit has been issued to each member of the party from either the District Commissioner of Crown Lands or the Conservator of Forests. Permits issued for free-range hunting are non-exclusive and they treat the operator in the same way as private hunters. Under this system game management by concessionaires is prohibited and the Forest Service retains ultimate control.

Recently it has also become possible for operators to manage wild animals on their own properties for guaranteed trophy hunting. The Forest Service and the Land Settlement Board now agree that it is acceptable for wild animals to be managed as part of a tourist operation, provided the animals are adequately fenced, the enclosed area lies within the species feral range and it is not erosion prone (S.12., Wild Animals Control Act, 1977). If leasehold land is involved, a recreational licence has to be acquired for an enclosed operation from the Land Settlement Board (S.17.3, High Country Policy, 1980). Both guided hunting types are also subject to the concession policy specifications of the particular land administering agencies involved.
Under the Forests Act (1949) the New Zealand Forest Service has statutory authority for all matters that relate to areas designated: state forest; state forest park; open indigenous state forest; and, forest recreational areas. Since the passing of the Forests Amendment Act (1976) its recreational responsibilities have been elevated to the same level as its production functions.

The current philosophy of the Forest Service is outlined in the new "Draft Policy Statement for State Forests". The draft policy stresses management according to multi-use principles and provides for many uses, including concession activities. More recently, the Service has further interpreted this policy by developing a general set of criteria with which to assess commercial recreative proposals. This document is slanted predominantly towards forest parks, but its general tenure applies to all state forests (Bignell, 1982).

In the draft document "Concessions in State Forests", the Service highlights possible areas of conflicts, lists policy criteria which should be emphasized and suggests means of incorporating these into licensing procedures. It is stressed that although the general criteria should be applied, each concession application must be examined on the merits of its particular case. In accepting an application the Service requires that the proposed concession is compatible with management objectives and it stipulates that proposed activities should add to the overall public enjoyment of the forest. Applicants are required to prove demand and operator experience, and to demonstrate that the proposal is a sound business venture, particularly if permanent structures are to be built or the forest is to be altered in some way. Client safety is held to be the responsibility of the operator. The Service also stresses that if facilities are built by the commercial operator, under the authority of a recreational licence
or permit, then the concessionaire does not necessarily have the right to refuse the general public access to the facility. This potential source of conflict can be avoided in areas designated 'state forest' because leases are able to be granted for specific sites. The Service suggests that concessions will not necessarily be offered on an exclusive basis but concurrently it reserves the right to offer further concessions to existing operators.

With regard to all private commercial operations the document makes it clear that a licence fee will be charged. It suggests that the fee charged should include a set amount for issuing the permit and a percentage of gross income, to be determined on the basis of capital investment involved and risk to either party.

Overall, this draft policy "Concessions in State Forests" clearly outlines proposed Forest Service policies for commercial recreative activities. This is in contrast to the actual "Draft Policy Statement for State Forests", which only contains very basic and generalized policies on this sector. The draft policy does however make it clear that the Service will "grant authority to individuals or organisations to provide services" (S.5.1.1) and that "it will permit, and where desirable, encourage tourist and public use through provision of a range of facilities under either the control of either the Forest Service or concession operators" (S.3.4.2).

The very generalized format of these brief policies referring to concessionaires is perhaps inappropriate when the diversity of possible concessionaire operations (e.g. guided tramping, lodge accommodation, ski fields, rafting) and the overall scale of the industry is considered.
5.2.6 National Water and Soil Conservation Organization

The functions and statutory responsibilities of the National Water and Soil Conservation Organization are embodied in two acts: the Soil Conservation and Rivers Control Act (1941); and, the Water and Soil Conservation Act (1967). Both its key role in promoting the conservation of the soil and water resources in the South Island mountain lands and the organization's policies have wide implications for some commercial recreational uses. The current "Hill and High Country Policy" (1981), of which this Organization, Lands and Survey and the New Zealand Forest Service are joint signatories, acknowledged "recreation as an acceptable use of hill and high country lands provided it is compatible with soil conservation and water management objectives" (S.16.1). In this policy it also is recommended that "areas unsuitable for grazing should be destocked and surrendered from Crown lease when any rights of use for commercial recreative purposes are approved" (S.16.2); this is closely in keeping with Land Settlement Board policy.

The Organization is therefore clearly stipulating that protection of the soil and water resources is fundamental to their approving recreative developments.

5.2.7 Ministry of Transport and Air Services Licensing Authority

Under current legislation, the Ministry of Transport has an important licensing and administrative function in many commercial recreational sectors. It is responsible for setting and monitoring vehicle and operator standards. In some situations it also has a significant role in influencing the commercial recreational licensing decisions of the land administering agencies. This is demonstrated by the Land Settlement Board's licensing procedures for heli-skiing and ski-plane operations, where in its final decision the Board has regard to any conditions imposed in terms of the
Civil Aviation requirements (Land Settlement Board, 1980).

Licensing responsibilities in the Ministry are associated with three divisions and their respective roles in commercial recreational management are set out below.

The Road Transport Division is responsible for administering passenger transport on land under the Transport Act (1962) and the Transport Licensing Regulations (1963). All operations must be licensed whether they travel off-road or on-road, and when paying passengers are carried a passenger service licence is also required. In decisions to grant this licence the Division considers many matters including: the operators' financial stability; evidence of demand; relevant support; and, the quality of the service being proposed.

Under the Harbours Act (1950), the Marine Division administers all activities on the sea, navigable lakes and rivers and foreshore zones. All boats over 4.87 metres (16 feet) are required by law to be surveyed and licensed, and craft operators have to obtain launch master's certificates. Any foreshore developments (e.g., boat ramps, wharves) must also have this Division's approval. Boats under this length are not within its jurisdiction, but in some situations the Marine Division has joined with small craft operators (e.g., rafting, jet boating) in setting up 'Codes of Practice'. In the Queenstown area all commercial jet boat operators now abide by certain operational standards, although there is no legal necessity for them to do this.

The Civil Aviation Division is responsible for administering many aspects of airborne recreative services under the Civil Aviation Act (1964) and the Hovercraft Act (1971). Actual licensing of commercial air transport
operations is, however, the responsibility of the independent Air Services Licensing Authority under the Air Services Licensing Act (1951).

As of 1982, a new "Domestic Air Services Policy" has come into effect and this represents a significant change in approach to licensing by the Authority. From 1984 onwards, new applicants will no longer have to prove demand, and limitations on aircraft capacity and geographical boundary designations will be discontinued. This policy therefore proposes that as long as qualitative aspects are met (e.g., operation experience, safety standards), commercial air services should be left to market forces.

The deregulation trend in commercial air services is in marked contrast to both the increasing degree of regulation and the protectionist policies being advanced by many other administrative agencies. It is also at variance with the Ministry of Transport's approach to granting a land enterprise a passenger service licence, because in this situation demand has to be proved.

Overall there appears to be little consistency in the commercial recreational licensing activities of the land administering authorities and the transportation licensing authorities. Air services are the exception here, as the air administering authorities are usually consulted in the administration of this sector. Yet both types of authorities have overlapping responsibilities in the commercial recreational area.

5.2.8 Ministry of Agriculture and Fisheries and the Wildlife Division, Department of Internal Affairs

Both agencies influence guided fishing enterprises due to their respective responsibilities in fresh water fisheries management under the Fisheries Act (1908) and the Wildlife Act (1953). The Fisheries Act provides for the administration of fresh water fisheries by acclimatisation societies,
(which are locally elected management organizations under the Wildlife Act, 1953). The protection, preservation and development of fresh water fisheries is stressed by the two agencies and licensing procedures are used by the acclimatisation societies to implement these objectives.

Commercial fishing guides are currently required to obtain licences for themselves and their clients in the same manner as the general fishing public. It appears therefore that neither department has any particular policy relating to commercial fishing guides using this resource.

The Ministry of Agriculture and Fisheries is also involved through the Animals Protection Act (1960) and the Animals Act (1967), in authorizing both deer farming in captivity for the purposes of safari hunting and horse riding. Decision making with regard to deer farming is, however, more directly the preserve of the New Zealand Forest Service.

5.3 REGIONAL AND DISTRICT LEVEL ADMINISTRATION - UPPER WAITAKI AREA

5.3.1 Introduction

Administration of commercial recreative enterprises at a more local level is the responsibility of a wide range of governmental branches, ad hoc bodies and territorial authorities. Administration at this level generally reflects the goals and specific policies established at the national level. At the same time, local level administration is quite distinctive in that it requires the interpreting of these national level directives with regard to the individual characteristics and needs of the local area. In some cases local agencies act more as administrative extensions of central agencies, but in other situations they are planning and policy making bodies in their own right.
In the Upper Waitaki, three agencies in particular have influential planning roles in the commercial recreational industry. At the regional level the Waitaki Catchment Commission and Regional Water Board has become a significant planning force both at the encouragement of the National Water and Soil Conservation Organization and in the current absence of regional planning by the United Councils. Therefore, despite any statutory responsibility in recreational planning the Board has by default become involved in this area. The Waitaki and the MacKenzie County Councils are both responsible for planning and directing development in the Upper Waitaki at the district level. The general purpose of planning at this level "is to secure economic and social benefits for the community as a whole" (Waitaki County District Scheme, 1981 and Tekapo (proposed) District Scheme, 1981). Although neither Council directly addresses the commercial recreational sector in its respective district scheme, the stated objectives and specific policies regarding general recreation and tourism are of considerable relevance to this industry. In the small freehold areas of the Upper Waitaki, the Council's zoning and ordinance regulations are of particular importance in regulating commercial recreative development, as the national land administering authorities have only limited statutory authority in freehold areas. The planning and administrative roles of these three local level agencies will now be examined in greater detail.

5.3.2 Waitaki Catchment Commission and Regional Water Board

Under current legislation this regional authority has statutory responsibility for soil erosion, rivers control and water quality management in the Waitaki catchment.

From this perspective the Commission comments on the suitability of sites for recreative developments and on applications for recreational permits
by the commercial sector. It has substantial influence in decisions regarding ski field developments and contributes to administrative assessments of other recreational proposals in the Upper Waitaki area (e.g. safari hunting and jet boating). The Commission advises on matters in respect to two policy objectives: to protect water and soil resources from recreational developments; and, conversely, to protect recreational developments and activities from the impacts of water and soil hazards. This is in accordance with its own "Manual of Objectives and Policies" and the directives of the National Water and Soil Conservation Organization.

5.3.3 The MacKenzie and Waitaki County Councils

Under the Town and Country Planning Act (1977) and the Local Government Act (1974), both the above councils have jurisdiction for district planning in the Upper Waitaki. The councils influence commercial recreational developments by stipulating in their respective district planning schemes what land uses are allowable in each part of the district, and by imposing ordinances for the designated zones. In the two schemes recreation is treated as a predominant use in parks and reserves and as a conditional use in all other zones. On hearing an application under this ruling, the councils will only grant a recreational proposal planning consent if land productivity, scenic values and water and soil conservation values are not jeopardized. It is apparent that the councils have a strong farming bias in this decision making as the Waitaki and MacKenzie District Schemes contain the following policies respectively: "To avoid where possible, any conflict between farming and recreational uses by requiring that recreational uses in rural zones be treated as conditional uses". (S.13.b); and, "to provide for ... land based recreational uses within most parts of the county, but to avoid any potential conflicts with farming or conservational uses by making active recreational uses conditional in
When facilities are needed with recreative ventures, planning consents also have to be obtained from the councils for such matters as building standards, access, sanitation and drainage.

The councils also influence commercial recreational development by advising national administering agencies as to the appropriateness of a proposed enterprise for the district. From the district scheme statements it appears that both councils generally favour recreational developments provided productivity, landscape and soil and water values are protected. This is demonstrated by the Waitaki County's policy that in most rural areas "the land owners should be encouraged to provide and maintain recreative areas .... by permitting the use of land and buildings for recreational purposes subject to appropriate conditions ..." (S.13.b).

In general, apart from land zoning and amenity stipulations, the councils have limited involvement in the actual administration of commercial recreational ventures. This is a consequence of most county areas being designated Crown lands under the direct responsibility of the Department of Lands and Survey and the New Zealand Forest Service. However, the district scheme general recreational policies are still the main regulatory influence on many commercial developments in freehold areas. Therefore if land tenure changes do occur in the two districts in response to the "Report of the Committee of Inquiry" (1982) findings, the recreational policies will necessitate close scrutiny to determine their effectiveness in procuring community benefits from commercial recreational developments.
5.4 SUMMARY

Commercial recreational administration in the South Island mountain lands is currently carried out in a very piecemeal manner. Some of the important policies in this area are still in draft form and many of the agencies involved appear both uncertain of their responsibilities and unsure over what approach they should adopt to this rapidly expanding industry.

The three main agencies with policy making responsibilities in commercial recreation are the Land Settlement Board, National Parks and Reserves Authority, (both administered through the Department of Lands and Survey) and the New Zealand Forest Service. Many other national and local level agencies are also involved in aspects of the industry. Involvement by these agencies usually reflects either their roles in general land management or their more specific responsibilities in related management areas (i.e. wildlife, transport and water and soil conservation).

Commercial recreational administration is fragmented amongst these bodies; this has resulted in some commercial sectors being heavily regulated while other sectors are ignored. A good example of administrative overlap is the range of approvals needed by an enclosed safari hunting operation on leasehold land. Authorization is required from: the New Zealand Forest Service; the Ministry of Agriculture and Fisheries; the Land Settlement Board; and, the local catchment authority (S.12, Wild Animal Control Act, 1977 and S.17, High Country Policy, 1980). If lodge accommodation is included, or guided clients are transported by vehicle, licences and permits are also required from the local county council and the Ministry of Transport, respectively. At the same time small craft operations and guided fishing activities are usually not licensed as commercial ventures.
In fact jet boats, rafts and canoes do not require any form of licensing if they operate outside of national park areas.

The administrative situation is generally more straightforward in freehold areas because many of the governmental departments associated with commercial recreation have no direct responsibilities under the land designation.

The agencies involved exhibit varying attitudes towards commercial recreational use. These differences in part reflect the individual statutory responsibilities which each agency has. In comparing the New Zealand Forest Service and the National Parks and Reserves draft policy statements, it is evident that within their respective areas of jurisdiction, these bodies have adopted different stances on the administration of commercial recreational developments. Due to the national parks' dual function of environmental preservation and public access (S.4., National Parks Act, 1980), the Authority stipulates that "Any proposed development within national parks must be carefully evaluated both to its necessity and its impact ... on the park environment ..." (S.8.5). In comparison, Forest Service policy is to expand uses in state forests "By permitting, and wherever desirable encouraging tourist and public use through provision of a range of facilities under the control of either the Forest Service, or concession operators" (S.3.4). Management agencies involved in licensing the industry also have diverse policies in respect to more specific management issues and these include: appropriate number of concessionaires; responsibility for client safety; construction and use of public facilities; and, matters needing consideration in licence applications.
policy statements also differ greatly in content depending on whether they are made at national, regional, or district administrative levels. Central governmental policy is, for instance, directly concerned with the effects of a development proposal on the national economy, while a district county is much more interested in the direct effects on the local community.

Yet at the same time all policy statements relevant to the commercial recreational industry have a number of inherent similarities. All management bodies clearly agree that landscape, soil and water values and rights of the general recreational public should be impacted to the minimum extent possible. There also exists broad agreement that commercial operators should pay some form of fee when they utilize public land resources for private gain. However, the most notable similarity in approaches between these agencies is the very generalized manner in which the commercial recreational industry is regarded. In some cases it is not differentiated at all from general recreation and tourism and in most instances few distinctions are made between the component sectors. Therefore, even in situations where management bodies have developed specific policies on concessionaire management, little thought appears to have been given to the large scale differences in social and environmental impacts which are associated with its potential forms.

The attitudes of local level administrators and commercial recreational operators in the Upper Waitaki to the implementation of these generalized policies will now be examined as part of the case study.
PART TWO : THE UPPER WAITAKI CASE STUDY

CHAPTER SIX

INTRODUCTION TO THE CASE STUDY

6.1 INTRODUCTION

In preceding chapters of this study, general features of commercial recreation in South Island mountain lands have been described. The nature of the resource has been outlined, together with features of the industry that utilizes the resource and the characteristics of the industry's recreational market. Administrative frameworks that the industry must work within have been identified. Major themes developed in Part One include:
- the diversity and fragmentation of the industry;
- the diversity and fragmentation of current administration;
- the ongoing growth and expansion of the industry; and,
- the failure of administrative agencies to establish clearly formulated management strategies with which to keep abreast of the industry's development.

Further elaboration of the issues raised by the study requires more detailed examination of the industry itself, and of the relationship between existing operators and existing policy and administrative arrangements. This is undertaken in the context of a case study of commercial recreation and its administration in the Upper Waitaki area.

In the following chapters the Upper Waitaki setting is introduced and the features characterizing the commercial operations are described briefly. This understanding of the industry is needed as a basis for appreciating
associated administrative issues. Administrative issues central to policy directives and licensing stipulations are then examined in greater depth. In examining these issues the attitudes of individuals with occupational involvement in the industry have been incorporated through the use of structured personal interviews. Individuals interviewed include both public sector administrators who have designated management responsibilities in commercial recreation, and the commercial operators located in the Upper Waitaki areas. Policy issues and questions which appear either particularly controversial or of central importance to the future of the industry are then identified and discussed further. The case study concludes with the introduction of a series of tentative recommendations that could possibly be incorporated into the administrative framework regulating the South Island mountain lands commercial recreational industry.

6.2 THE UPPER WAITAKI SETTING

6.2.1 Introduction

The case study setting is a large inter-montane area located in the centre of the South Island (Figure 2). Its boundaries coincide with those of the Upper Waitaki basin (Figure 3). The catchment lies to the west of the Waitaki Dam and is bounded by the Kirliston, Two Thumbs, St Bathans and Hawdon Ranges, and the Main Divide. In the sections which follow, the basin is described briefly according to its physical environment, land tenure, land use, and demographic and settlement patterns.

6.2.2 The Physical Environment

The physical features of the case study area closely resemble those of South Island mountain lands generally. The area is characterized by both extremes in topography and climate, and general environmental instability. The steep glacial mountains lying to the west fall to gently rolling terrain in the central basin area. Due to the influence of the Southern
Figure 3: Upper Waitaki Area - Land Tenure
Alps, annual precipitation rates decline over the basin as distance from
the Alps increases. Air temperature patterns characteristically are
sub-continental and thus significant seasonal and daily variations occur.
Strong gusty winds are another notable feature of the basin's climate.

Due to climatic and topographical factors, soils within the basin tend to
be shallow, weakly leached and highly susceptible to erosion.

These physical factors, plus human interference, account for approximately
ninety percent of the case study area being covered in both alpine barrens
and unimproved tussock grasslands. The balance is made up of small areas
of improved pasture, indigenous beech forest and water bodies.

6.2.3 Land Tenure
Almost the entire basin area described above is designated under public
ownership (Figure 3). Most is held under leasehold tenure for pastoral
farming purposes. The Land Settlement Board administers both leasehold
land and the high mountain areas designated as unalienated Crown land.
Other areas in public ownership include the Mt Cook National Park and the
remnant beech forests. These are administered respectively by the
National Parks and Reserves Authority and the New Zealand Forest Service.

6.2.4 Current Land Use
The Upper Waitaki resource currently is of particular importance for four
overlapping uses:
- extensive pastoralism, supplemented by small scale intensive pastoral
development, accounts for much of the land area used;
- hydro-electric power generation is the most significant use of the basin's
water resource, in terms of quantity;
- wildlife habitats are of significance for many indigenous and exotic
Recreational use of the basin is now considered in more detail.

Large numbers of overseas and domestic recreationists visit the area each year to pursue recreational activities. During the 1981 to 1982 season, estimates put the number of recreationists spending at least one night in the basin at around 200,000 (Hewson and Houghton, 1982).

Recreational use of the Upper Waitaki area takes two main forms:
- scenic touring during the summer season (the area is part of the main South Island 'tour circuit'); and,
- outdoor recreation pursuits during both summer and winter periods.

Both forms overlap to an extent, as scenic tour recreationists also pursue outdoor activities during their relatively short stays in the Upper Waitaki region.

As a result of specific resource requirements, most outdoor recreational pursuits are seasonal in nature. During the summer months water based activities such as fishing, boating and water skiing are very popular. They usually are associated with camping and general relaxation. Mountain based activities such as climbing, tramping and short walks are also commonly engaged in. In the winter months both on-field and off-field skiing are the predominant recreative pursuits. The Upper Waitaki resource also is popular for a wide range of additional recreational activities (eg hunting, gliding). Many of the activities outlined above are associated in some form with the provision of commercial recreational services (Appendix 7).
6.2.5 Demographic and Settlement Patterns

Current demographic and settlement patterns reflect the employment requirements of the land uses outlined above.

The rural population associated with pastoralism is both very small in number and scattered in location. Hydro-development of the basin currently is nearing completion. However, this activity still accounts for a large temporary work force located at Twizel. In addition to its hydro-development servicing role, Twizel is the basin's major service centre for other local inhabitants.

Upper Waitaki residents involved in the recreational industry are located at the four smaller service centres - Mt Cook, Tekapo, Omarama, and Otematata. The number of permanent employees associated with this use is relatively small due to the seasonality of the recreational market. Consequently, the sizes of these centres tend to fluctuate considerably on a seasonal basis.

6.2.6 Summary

Commercial recreational enterprises established within the Upper Waitaki basin (Appendix 4) are located in an area featuring a harsh and delicately balanced physical environment. The recreational industry utilizes this resource in association with a range of overlapping other uses. These uses together have produced the basin's current social characteristics - a sparse rural population and small scattered service centres. All such features require consideration in both generally understanding and administering the Upper Waitaki commercial recreational industry.
CHAPTER SEVEN

IMPLEMENTATION OF THE INTERVIEW SCHEDULE
AND RESEARCH FINDINGS ON THE UPPER WAITAKI COMMERCIAL RECREATIONAL INDUSTRY

7.1 INTERVIEW SCHEDULE DEVELOPMENT AND USE

This study is directed towards an evaluation of public administrative policy and practice that is relevant to the commercial recreational industry. Effective administration of an industry must be founded upon detailed understanding of the industry, together with an appreciation of its effects.

Very little background information currently is available on the Upper Waitaki commercial recreational industry. Consequently, in the development of this study it was necessary to find and set down the primary data needed to understand both the industry's characteristics and the effects of policy directives and administrative procedures. Structured interviews with a range of industry and administrative personnel were used to elicit the required information and perceptions.

The twenty-eight respondents selected included both public sector administrators with designated responsibilities in commercial recreational management and commercial recreational operators (Appendix 1). The administrators interviewed come from a range of different administrative levels - planning, implementation, etc. within statutory bodies. All commercial recreational sectors were represented in operator interviews with the exception of commercial jet boating, as there are no jet boat enterprises in the Upper Waitaki area. The operators interviewed come from different levels of management within the enterprises. They included
owner-operators, company directors and administrative staff. Therefore, in considering the following responses both the diversity in respondents' background experience and perspectives need to be appreciated.

A structured interview schedule was developed to provide a common format for all interviews. 'Structured' in this context means that the interview schedule consisted of a series of question headings, together with additional prompts (only some of which were selected for use in a given interview). Each individual interview could then be tailored to suit the respective type and extent of the respondent's involvement with the industry. Through the use of prompts respondents were encouraged to respond to the predetermined questions with factual and opinion related answers. Where appropriate, answers were followed up with impromptu questions in order to generate additional sources of information.

The interview schedule concentrated on eliciting information on four main aspects of commercial recreation:
- trends in both commercial and non-commercial recreational use;
- the characteristic features of the commercial recreational sector;
- costs and benefits associated with the industry; and,
- attitudes to particular policy stipulations and licensing procedures.

Descriptive information characterizing the industry (generated by questions dealing with the first three topic headings above) was needed to understand respondents' perspectives towards regulative issues. The interview schedule is presented in Appendix 2.

Implementation of the questionnaire involved three stages:
- selection of suitable respondents, who were then contacted by letter;
- visits to respondents who were available for personal interviews; and,
- telephone interviews with respondents unable to be contacted personally.
Contact was made eventually with all respondents. With the exception of four telephone contacts, most interviews were of several hours' duration. The considerable length of interviews reflected the concern many respondents had for the issues being addressed and their (often stated) hope, that through this study national level administrators would be made much more aware of the practical implications of policy directives and administrative procedures.

Summarized accounts of responses are presented in both this chapter and the chapter following. Respondents' comments concerning recreational growth rates, the industry's general features and effects are discussed below. In Chapter Eight respondents' attitudes towards administrative issues are outlined.

7.2 RECREATIONAL TRENDS IN THE UPPER WAITAKI

7.2.1 Introduction

Change in the commercial recreational industry is to a considerable extent pre-determined by change in the total recreative market. Understanding recreational trends therefore is useful in enabling anticipatory planning and administration for the industry. In Part A of the Interview Schedule (Appendix 2) respondents consequently were asked to comment on general trends in recreational use of the Upper Waitaki area.

Distinctive trends were apparent from the responses given. These trends usually corresponded with both seasonality - summer/winter - and origin of the recreationists - domestic/international. The trends outlined will be discussed under these categories.
7.2.2 **Overseas Recreationists - Summer Season**

Predominant trends currently occurring in summertime use of the Upper Waitaki area by overseas visitors include:

- a very gradual increase in overall numbers of visitors coming into the area due to minimal growth in the major sector (ie coach tour recreationists staying in hotels);
- changes in the nationality of overseas visitors;
- changing levels of discretionary spending amongst the 'up-market' sector generally; and,
- marked trends towards both 'economy' and more independent holidays.

Both these trends and their implications will now be considered in more depth.

The minimal increase overall in overseas visitors coming into the area during the summer months is a consequence of the very 'quiet' state of the hotel based, coach tour market. The minimal growth in this 'up-market' segment in recent years is of significance due to its large size. One administrator estimated, for example, that this sector accounts for seventy-five percent of all bed nights occupied in the Mt Cook National Park during the summer season.

Respondents also commented on changes in the nationality of overseas summer visitors. With the exception of the camping tour market, most agreed that both the percentage of Australians was declining, and that North American and Japanese visitors were increasing in number. Several operators suggested the trend was a beneficial one. One estimated that of the Japanese and North Americans who stayed overnight in the area, a higher percentage took advantage of his service than did Australian visitors. Two features of non-Australian visitors were mentioned in this connection:
- high discretionary spending levels on a daily basis; and,
- more time spent in the area due to greater use of flights to Mt Cook (as opposed to coaching) while on tour.

Australians, however still remain the major 'up-market' sector, and therefore a very important component for the commercial recreational industry.

Another trend noted amongst the hotel based, coach tour market was a general decrease in levels of discretionary spending. To compensate for this factor Mt Cook Lines, for instance, have introduced a shorter economy scenic flight.

At the same time two sectors within the overseas summer market are experiencing significant growth rates:
- the 'economy' camping tour sectors; and,
- the 'free independent travel' sector.

Growth in both areas is of considerable importance for many commercial enterprises. The majority of people on camping tours are young Australians, and according to many operators, they provide a ready market for 'adventure' activities. Several operators suggested independent travellers were becoming an important market segment also. Apparently, these recreationists engage in more commercially provided services per person than usual for overseas recreationists. This was believed to be due to two factors:
- a proportionally higher ratio of discretionary spending to total spending; and,
- a tendency to stay longer at particular locations than their coach tour counterparts.
7.2.3 Overseas Recreationists - Winter Season

Winter recreational trends are quite different to those outlined for the summer months. The number of overseas visitors coming into the area during the winter season is increasing rapidly. Promotion of the Upper Waitaki by the 'Mt Cook Ski Region' association was suggested frequently as one of the main reasons for this trend. With the exception of the Tekapo Ski Field operator, all ski season operators indicated that they were benefiting from the increase. Greatest benefit was accruing to the more 'up-market' services - heli-skiing and glacier skiing.

According to respondents this developing wintertime market comprises mainly young Australians, although North Americans also are becoming a significant sector. Independent travel and self-drive package tours are the most popular modes of travel. They are an important group for the hotel industry as they usually stay in more 'up-market' accommodation. Fifty to seventy-five percent of Mt Cook Hermitage patronage, for example, was estimated to originate from this sector during the winter months. It was noted also that during the winter months overseas recreationists tend to spend longer in the Upper Waitaki area. This was considered due to outdoor activities (rather than scenic touring) being the major attraction during the winter season.

7.2.4 Domestic Recreationists - Summer Season

Numbers of New Zealanders holidaying in the Upper Waitaki area during the summer season are steadily increasing. Growth, however, has been limited mainly to the economy accommodation sectors. Higher usage rates therefore are being experienced, particularly by the camp grounds. According to several respondents, these recreationists also appear to be staying longer at over night destinations, and consequently touring less. The steady growth rate in this sector, however, has little influence on the commercial
industry as only a small percentage of domestic summertime visitors utilize commercial recreational services.

7.2.5 Domestic Recreationists - Winter Season

domestic recreational use of the Upper Waitaki area is increasing rapidly in the winter season. This reflects the growth in popularity of skiing activities generally. With the exception of the 'up-market' skiing services (which have a very low percentage of domestic patronage), most other commercial services are being influenced significantly by the increase. Hotel and motel accommodation sectors also appear to be sharing in this increase to a much greater extent than during summer months. Both climatic factors and the relatively greater spending power of the skiing populace were suggested as two reasons for this factor. According to one operator, there also has been a growing trend in recent years for skiers to tour between fields.

7.3 THE UPPER WAITAKI COMMERCIAL RECREATIONAL INDUSTRY

7.3.1 Introduction

Features of the commercial recreational industry located in the case study area are briefly outlined in the sections which follow. The outline is based on the responses generated by Part B of the Interview Schedule (Appendix 2). These responses have been tabulated in Appendix 7 for each individual enterprise under a range of headings. The information in Appendix 7 is further summarized here and applied to the industry as a whole.

7.3.2 Commercial Services Available

With the exception of scenic jet boat touring, all recreative services common to the South Island mountain lands are offered in the case study area (Figure 4). The Upper Waitaki does, however, have both a higher incidence of winter alpine activities and fewer boating services than the
Figure 4: Upper Waitaki Area
- Commercial Recreational Enterprises

1. Air Safaris & Services (NZ) Ltd
2. Alpine Adventures (L. Tekapo)
3. Alpine Guides (Mt. Cook) Ltd.
4. Alpine Recreation Canterbury
5. Benmore Charter Service
6. Glentanner Park (Mt. Cook) Ltd.
7. Horse Rides (G. Simpson)
8. Lake Ohau Ski Field Ltd.
9. Lilybank (Trophy Guide Service) Ltd.
10. McKenzie Country Safaris
11. Mt. Cook Lines
12. New Zealand Fly Fishing
13. Omarama Safari Tours
14. South Canterbury Fishing Safaris
15. Tekapo Ski Field Ltd.
16. Tramper Service
South Island as a whole.

7.3.3 Central Base
With the exception of several fishing guides and one guided trekking operator, all enterprises have a central base within the Upper Waitaki, Mt Cook, Glentanner Park and Tekapo being the most popular locations.

7.3.4 Location of Services
The actual services offered are provided throughout the case study area. Some services tend to have very specific resource requirements and they are therefore associated with specific terrain (eg climbing). Other services are able to operate over a much wider range of areas.

The scale of area utilized by the different services also varies. Enterprises with fixed facility requirements (eg ski fields) are associated with relatively small areas. Again, other operations are able to be much more free ranging. The guided climbing, tramping, fishing and scenic flight services, for example, all extend into areas adjacent to the Upper Waitaki basin.

7.3.5 Years in Operation
Guided climbing and nordic skiing were the first commercial activities to be established in the Upper Waitaki area. They were established during the 1880's and 1910's respectively. Scenic flight services, the mountain-eering school and ski fields were the next main enterprises to develop. Recently these services have been both expanded and joined by a wide range of additional services. Most of the more recent enterprises are small scale, summertime operations.
7.3.6 Months of Operation

With the exception of scenic flight and private guided climbing services, all other enterprises are seasonal. Three different types of 'seasons' are common:
- the December to February summer holiday period;
- an extended spring to autumn period; and,
- the mid-winter to spring skiing season.

The particular months that a service is operational depends on many factors; for example its climatic requirements, any wildlife licensing stipulations and the number of recreationists in the area.

7.3.7 Weather Dependency

Most operations are very weather dependent. The most highly weather dependent include climbing, skiing, scenic flights and fishing. Mt Cook Lines has only fifty percent of flight time available on average each month. Due to the climatic extremes characteristic of the basin, this feature often significantly influences the economic viability of operations.

7.3.8 Service Length

Services offered range in length from several weeks to fifteen minutes. The shortest services provided are all highly mechanized. Those extending over a day in length include guided climbing, trekking, safari hunting, kayaking and nordic skiing.

7.3.9 Investment Levels

The amount of capital investment involved differs considerably depending on the type and scale of operation, and ranges from more than a million dollars to less than one thousand. The most capital intensive services are ski fields and air services. Comparatively low levels of investment are associated with the smaller guiding operations.
Ongoing costs are substantial with most operations. With the exception of air services, which have extremely high fuel costs, the two major costs are usually labour and advertising expenses. Staff wages normally comprise a high proportion of total costs due to these service industries being very labour intensive. Advertising costs are substantial. It was estimated, for example, that the 'Mt Cook Ski Region' has invested over $250,000 on marketing in recent years.

7.3.10 Use of Public Facilities
Publicly owned mountain huts are used by guided climbing, nordic skiing and tramping operations. Some services also utilize publicly maintained tracks and roads to a considerable extent (eg Mt Cook Airport access road). Within the national park, accommodation is required by both Alpine Guides (Mt Cook) Ltd and Mt Cook Group Ltd.

7.3.11 Client Numbers
The numbers of recreationists employing each service range from 'tens of thousands' to under twenty people annually. There is usually a close association between the numbers of clients catered for by a service and both the level of capital investment and number of staff involved.

7.3.12 Client Nationality
The more 'up-market' and 'specialized' commercial recreational services are employed mainly by overseas visitors. In contrast, New Zealanders tend to make greater use of the 'mass market' operations such as ski fields and launch trips. More domestic recreationists therefore are serviced by the industry overall, despite a greater number of enterprises being dominated by overseas patronage.
7.3.13 Client Age and Sex Profiles

Both age and sex characteristics appear to be influenced by three main factors:
- the physical expertise requirements of the service;
- the type of accommodation in close proximity; and,
- the traditional association of an activity with a particular sex.

As the activities become more specialized and physically demanding the range of age groups involved usually narrows. The influence of nearby accommodation types on participation patterns is apparent from the differing clientele of the two scenic flight operations. Mt Cook Lines is located near to the Mt Cook hotel complex and Air Safaris and Services (NZ) Ltd is based near two camp grounds. Their major markets are thus respectively fifty to sixty year old hotel staying visitors, and under thirty year old camping tour recreationists.

Most services are patronized equally by males and females. Exceptions include fishing, hunting and climbing activities which are male dominated, and kayaking which is especially popular amongst young females.

7.3.14 Trip Form

While in the Upper Waitaki area recreationists travel either independently or on organized trips. Both groups make approximately equal use of the commercial services available. Most services dominated by independent travellers have a high proportion of domestic users. Others tend to be either very 'up-market', or of long duration (eg guided climbing, skiing trips) if utilized mainly by overseas visitors travelling independently.

7.3.15 Travel Mode

Recreationists journey by a range of public and private transport modes. There is a degree of association between the transport modes used
and the commercial activities engaged in by overseas visitors. Overseas recreationists who travel predominantly by rental vehicle or scheduled public transport tend to utilize:

- very specialized recreative services;
- services which are of long duration; and,
- services which are commonly engaged in as part of a circuit (eg skiing).

By comparison, New Zealanders usually travel by private vehicle irrespective of the commercial activities they engage in.

7.3.16 Accommodation

Most commercial services are associated with a particular accommodation form - hotel, motel, camping grounds or private accommodation. This characteristic usually reflects two factors:

- the proximity of a service to a particular type of accommodation; and,
- the relative pricing levels of both the accommodation and the service being offered.

7.3.17 Growth Rates

Growth rates associated with individual enterprises range from a slight decline in numbers to a rapid increase. The most rapid increases are in both skiing activities and services associated with the summer camping tour sector. Off-field skiing activities, however, are the only sector experiencing "phenomenal" growth rates reminiscent of the 1960's. Between the 1980 to 1982 seasons, for example, numbers skiing the Tasman Glacier and heli-skiing increased from 200 to 1300 people, and 250 to 600 people respectively.

7.3.18 Ownership Form

There is again, a close association between the form of enterprise ownership and scale factors. Both the small and recently established enterprises
usually are owned and operated on an unstructured basis. The larger operations are all company owned. With the exception of Whirlwide Ltd and Mt Cook Group Ltd, none of these companies have branches outside of the Upper Waitaki area.

In some cases ownership structure is complicated by the high degree of inter-relationship between particular operations. Examples include:
- Heliski Ltd which is a joint subsidiary of Glentanner Park (Mt Cook) Ltd and Whirlwide Ltd;
- Alpine Guides (Mt Cook) Ltd whose shareholders include Mt Cook Group Ltd and the Tourist Hotel Corporation of New Zealand; and,
- the two tiered ownership system at Glentanner Park. (In this situation, Glentanner Park (Mt Cook) Ltd is in effect subcontracting as several operators have established services under the auspices of the Glentanner Park (Mt Cook) Ltd licensing agreement.)

7.3.19 Employment

The commercial recreative services provide considerable direct and indirect employment. With the exception of the air service companies most employment is offered on a seasonal basis only. However, much of the seasonal work provided is complimentary and thus some individuals are able to find work in the basin during much of the year.

The labour requirements of the different enterprises differ considerably. The Lake Ohau and Tekapo ski fields, for instance, require up to thirty and forty-five temporary staff respectively. This is in marked contrast to the very limited part time employment associated with some of the smaller scale guiding services. Considerable indirect employment is also generated by the enterprises in the associated service sectors such as accommodation and transportation.
7.3.20 Land Tenure
In non-national park designations there appears to be no great association between the location of commercial enterprises and land tenure (Figures 3 and 4). Other significant factors such as resource requirements and availability of the market appear to have a much greater influence. Conversely, in the national park area the limited number and range of enterprises currently operating is directly attributable to the land tenure and related policy stipulations.

7.3.21 Licence Agreements
Most of the enterprises within the Upper Waitaki basin have been licensed in some form as a condition of their providing commercial recreative services. The main agencies involved in recreational licensing within the basin are the Department of Lands and Survey, the Air Services Licensing Authority, and the Ministry of Transport (Chapter 5). The New Zealand Forest Service has administrative responsibilities for both the safari hunting operation at Lilybank and the two small tramping enterprises which utilize the Lake Ohau State Forest area.

Approvals are required in some cases too from the Waitaki Catchment Commission and Regional Water Board and the two respective county councils.

7.3.22 Dealing Between Enterprises
During the summer months most operations offer services on an independent basis. According to the operators this reflects the more direct competition between enterprises in the summer period. However, a limited degree of co-operation does exist. The enterprises based at Glentanner Park work together to some extent. Air services are employed by the guided climbing and tramping enterprises in some trips and both Mt Cook Lines and Alpine Guides (Mt Cook) Ltd work together with their Westland counterparts.
In the winter season the situation is totally different. Most services are complimentary and operators consequently work closely together for this reason. The three main recreative sectors that work together are the ski fields, the air services, and the alpine guiding services. Due to the high degree of interdependence between both these and other winter season recreative sectors, nine operators have joined forces on an official basis recently to promote the 'Mt Cook Ski Region' as a winter destination.

7.3.23 Proposed Changes

All operators stated that they wished to expand their businesses. Three main methods were suggested of accomplishing this:

- offering new services;

- operating from more locations; and,

- expanding the services already provided to cater for a wider range of client age groups and capabilities.

Changes proposed more specifically in regard to individual enterprises are outlined in Appendix 7.

7.4 BENEFITS AND COSTS ASSOCIATED WITH THE UPPER WAITAKI COMMERCIAL RECREATIONAL INDUSTRY

7.4.1 Introduction

Commercial recreational enterprises generate both beneficial and negative effects. In Part C of the Interview Schedule (Appendix 2) respondents were asked to identify impacts deriving from the Upper Waitaki enterprises. Those benefits and costs specified by respondents are presented in summarised form below.
7.4.2 Benefits

Benefits deriving from the Upper Waitaki commercial recreational industry as a whole flow to four main spheres:

- the national economy;
- the Upper Waitaki region itself;
- recreationists generally; and,
- recreationists employing the commercially provided services.

Both the general benefits associated with these groupings and additional benefits derived from particular commercial recreative sectors are now discussed in turn.

The main benefit for the national economy frequently was suggested to be the industry's generation of foreign exchange earnings. Respondents considered overseas funds were generated by two means:

- attracting overseas recreationists to New Zealand (by the featuring of commercial enterprises in overseas advertising); and,
- providing services on which overseas 'dollars' are spent.

Two additional national economic benefits also were considered to stem from the industry. These were the stimulation of the domestic economy generally and the diversification of the economy from a traditional reliance on primary production.

At the regional level, respondents believed increased employment opportunities and stimulation of the regional economy were of major significance. The industry was suggested as producing these impacts by both attracting more recreationists to the Upper Waitaki area and encouraging recreationists to stay longer. The beneficial effects of increased employment opportunities and stimulation of the economy are derived in two ways:
- directly, stemming from the actual provision of recreative services;
and,

- indirectly, stemming from both the personal expenditure of recreative employees and the purchase of goods and services required in the provision of recreative activities.

These beneficial economic effects, and subsequent social implications of the industry, therefore enable a higher than otherwise possible level and scale of community services and infra-structure to be maintained in the Upper Waitaki region. This factor is of direct benefit for Upper Waitaki residents and visiting recreationists.

Respondents also suggested other benefits stemming from the industry for recreationists generally; namely, the provision of commercial services in the Upper Waitaki basin increases public recognition of the area's recreative resources. This suggestion is verified by the area's history of recreational uses. Most initiative for the earlier established activities of skiing, climbing and glacier walks came from the commercial sector (Pearce, 1972). More recent activities such as rafting and canoeing also have been introduced into the area by commercial entrepreneurs.

Another positive aspect of the industry relates to those recreationists employing the commercial services. Commercial services fulfil individuals' recreative needs by enabling a much wider range and increased number of people to enjoy both the mountain land environment and particular recreative experiences. Scenic flight operations, for example, enable thousands of recreationists each year to view the high glacial regions of the central Southern Alps. Another example is the less experienced and physically able recreationists who are able to safely enjoy 'wilderness' areas due to the availability of guided treks.
Additional benefits associated with particular commercial recreational sectors now are discussed.

Air service operators suggested the following additional benefits for Upper Waitaki residents due to the location of their recreative services in the basin:
- availability of aircraft for use in emergencies - search and rescue, ambulance work, sheep spotting, fire fighting and supply drops;
- availability of aircraft for use in non-recreative sectors (eg pastoralism);
- availability of scheduled flights service to other centres by Mt Cook Lines; and,
- availability of Air Safaris and Services (NZ) Ltd private airstrip for use by the general public.

The guided climbing and tramping operators suggested additional benefits stemming from their sector included:
- education of clients in safety standards, environmental protection and in hut behaviour;
- assistance to private recreationists encountered in potential problem situations; and,
- the ready availability of guides for search and rescue attempts.

One operator also emphasized that the provision of commercial guiding employment encouraged the best guides to stay in New Zealand and that this benefited climbers generally.

Operators providing other guided services such as fishing, shooting and kayaking suggested that they too had a very important educative role in their respective services. This was particularly in respect to safety and environmental protection matters.
7.4.3 Costs

Commercial recreational enterprises within the Upper Waitaki also produce negative effects. With the exception of public agency administrative costs, most costs incurred by the industry are associated with particular sectors. The general administrative costs incurred, and the negative effects associated with particular sectors are examined below.

Public agency administrative costs are produced by the industry as a whole because the commercial recreational sectors require regulating and monitoring to ensure the interests of the general public are safeguarded. Administrative involvement is necessary as many of the enterprises both introduce recreationists to potentially high risk situations and in this process have the potential to negatively effect the physical environment and other user groups. Additional public expenditure costs sometime also stem from those enterprises utilizing public facilities. This reflects the provision and maintenance of public facilities being the financial responsibility of the public sector.

The negative effects associated with particular recreational sectors within the commercial recreational industry now are discussed in regard to three spheres of influence:
- private recreationists;
- non-recreational user groups and local communities; and,
- the physical environment.

Respondents believed that the conflicts between some commercial and private recreationists were of considerable significance. The noise impact of enterprises using mechanized transport, especially helicopters, aeroplanes and jet boats was considered to have a substantial impact upon recreationists wishing to enjoy a 'wilderness experience' in the same area. Conflict
over the use of public facilities was another source of tension between private recreationists and those particular commercial services utilizing public facilities. This was viewed as a significant problem, especially in regard to public hut use in the Mt Cook National Park. Several respondents considered that the land use requirements of some sectors was a cost for private recreationists also, because it resulted in access to certain areas being restricted. The Lilybank safari hunting operation, for example, was suggested as representing an erosion of private hunters' 'traditional right of access' to mountain land areas.

Commercial enterprises were suggested by some respondents as producing negative effects for non-recreactive user groups and the local communities. Fire risks and stock disturbance were viewed as potential problems stemming from those commercial services requiring access through pastoral lease areas. Noise pollution associated with commercial air services was viewed as another problem for Upper Waitaki residents. Several respondents suggested also that the temporary employment generated by the larger operations produced significant social problems for the local communities. According to those particular respondents, the large proportion of employees being young, single and transient results in the communities servicing the industry being fragmented and unsettled.

Negative environmental impacts associated with the industry mainly stem from access requirements. An example is the bad scarring caused by the Ohau Ski Field access road. Several respondents suggested that the facility and access requirements of enterprises located in the national park were also a cost because they detracted from the natural landscape.
The Upper Waitaki recreational industry is continuing to increase both in overall scale and in the range of services being offered. Most rapid growth currently is associated with the summer camping tour market and the winter ski market. It appears likely that expansion will continue to be centred on these areas.

Already the recreational industry is diverse both in the types and scale of the enterprises being offered. General features of the individual enterprises, therefore, are very different in regard to user characteristics, location, etc. Overall, the services do tend to be, however, highly weather dependent, very seasonal and labour intensive. The operations in many cases also exhibit a high degree of interdependence on a regional basis.

Both benefits and costs are associated with the existence and continued expansion of the industry. Benefits are generated for the national economy, the local communities and recreationists employing the services. At the same time enterprises negatively impact private recreationists and the local communities.

Administrative agencies therefore have a very important role in deciding what level of environmental and social costs are acceptable, considering both the land resource involved and the benefits that result. Through weighing up these factors the appropriateness of particular enterprises in an area can be gauged. Certain administrative issues are addressed in making such appraisals. Chapter Eight examines central administrative issues from respondents' perspectives.
CHAPTER EIGHT

PERCEPTIONS OF ADMINISTRATIVE ISSUES BY PEOPLE
IN THE INDUSTRY

8.1 INTRODUCTION

Administrative issues central to commercial recreational administration are reviewed in this chapter. Administrative issues that were judged to be potentially controversial were explored in Part D of the Interview Schedule with both administrators involved in the industry and recreational operators located in the Upper Waitaki (Appendices 1 and 2).

In examining the various administrative issues outlined in the interview schedule, questions centred on two matters, firstly how satisfied the respondents were with the present administrative system and secondly their recommendations, if any, for future policy directives and licensing. The questions and summarized responses are discussed below in turn and relevant implications are then considered.

8.2 ADMINISTRATIVE ISSUES

8.2.1 Licensing Necessity

Question One attempted to determine two factors:
- respondents' attitudes to administrative agencies' licensing involvement in the industry; and;
- the positive and negative effects of licensing, per se.

Question One: Do you think licensing is necessary in the commercial recreational industry, and if so, why?
replies generated by the question largely reflected respondents' individual roles in the industry. All administrators believed recreational licensing was necessary. Operators' responses, by contrast, ranged from "yes, definitely", to "totally unnecessary". The few operators who disagreed with licensing of recreational activities considered their services were currently either too small to warrant licensing, or sufficiently regulated under alternative administrative controls. Those who agreed with recreational licensing believed it was necessary for three main reasons:
- to protect the environment;
- to ensure client safety; and,
- to protect the rights of the general public.
Some respondents also suggested licensing was important because it both "ensured professionalism" and "provided operators with a degree of protection" (in the case of an accident and in respect to non-licensed competition). The degree of security associated with licensing was considered important for protecting existing investments and providing some level of stability in future planning. Respondents therefore were in some cases asking for the privileges associated with private enterprises, but at the same time protection from its implications - namely competition. One administrator added that licensing both provided a means of monitoring events in the industry generally, and was essential in collecting revenue from operators.

Administrators, and most operators, therefore agreed that recreational licensing was an appropriate means of ensuring operator responsibility. The process does require, however, that considerable effort and finance be expended by both operators in achieving acceptable licensing standards and by administrators in developing and applying licensing procedures. Administrators consequently need to ensure that this process fulfills licensing objectives and that licensed operators are receiving protection.
from unlicensed competition as expected.

8.2.2 Delegation of Administrative Responsibilities

Administrative responsibilities are currently divided between a number of agencies. Question Two was concerned with respondents' views towards three aspects of this delegation:

- the appropriate roles of administrative agencies currently involved in the industry;
- the suitability of the levels at which decisions presently are being made (eg national, regional and district); and,
- what role, if any, should the industry itself have in administration.

Question Two: What agencies should be responsible for administering the commercial recreational industry?

The question drew a wide range of very differing responses. This reflects to a considerable extent, the extreme diversity of enterprises in the commercial recreational industry.

All air service operators believed licensing in their sector should be left to the Air Services Licensing Authority and the Ministry of Transport. The operators accordingly suggested other authorities should work through both bodies if they wished to impose additional controls. Should land administering agencies want to implement regulations independently, they proposed that the authorities concerned should restrict their involvement to land use matters only. Some administrators agreed with this general approach, provided the land administering authorities had overriding control in matters such as landings and air drops. Such control was considered particularly necessary in national parks. Other administrators disagreed as they wanted more substantial influence over other aspects such as: flying heights; number of passengers carried, ... etc.
Several launch, four-wheel drive and fishing operators also stated that
the Ministry of Transport, and not the land administering authority, should
be responsible for recreative licensing when vehicle use was central to the
enterprise.

In the case of game animals and fish being involved, two operators suggested
recreational licensing should be the joint responsibility of a professional
operator's association and a "game management" department.

The most popular response by both operators and administrators, however, was
that licensing responsibilities should be designated to both the relevant
land administering authority and where possible, the appropriate national
operators' groups. Respondents favoured involvement of the operator groups
in advisory and monitoring roles. This was to ensure representation of
the industry's perspective in management decisions to a much greater extent
than that occurring in the past. Disagreement existed, however, as to what
level of influence the land administering bodies and the professional
operator associations should have respectively. Some respondents were
reluctant to accept that the land administering authorities should have
final legal sanction, as they considered these agencies had insufficient
understanding of the commercial recreational industry. Conversely, other
respondents strongly believed that the national operator groups should not
have any absolute control. This was to prevent them gaining the opportunity
to both interpret and apply regulative standards to their own advantage.

To expect private sector operators to deal without bias in assessing
prospective enterprises which would (if permitted) become competition was
considered unrealistic. In the absence of monitoring controls, consideration
of issues on a joint basis was also considered to pose risks to the general
public. For example, operators could agree within the auspices of a
professional association to jointly increase the prices of their services.
Other respondents believed that none of the above options were suitable due to the ongoing administrative fragmentation that would result. The two options suggested as alternatives were a government agency specializing in concessionaire management and a 'watch dog' board with overriding administrative influence in the industry. The administrator who supported the 'watch dog' board option envisaged it would monitor the industry on behalf of the general public, and be composed of members from existing bodies such as the New Zealand Mountain Safety Council and the Federated Mountain Clubs of New Zealand Inc.

Both of the above recommendations arise out of concern for the deficiencies in current administrative structure and practice. Two particular problems, frequently commented on by respondents, were the over regulation of some recreational sectors and the total disregard of other sectors, both of which are attributable to the present degree of administrative fragmentation. One scenic flight operator, for example, considered the present degree of licensing overlap between air services and land administering authorities was 'ridiculous'. Another administrator considered it ironic that despite the number of national level departments and agencies which have established policies and planning stipulations for ski fields, no one agency has accepted responsibility for monitoring overall quality and safety standards.

The administrative levels at which decisions currently are being made was also criticized. Several respondents suggested many decisions were being made too centrally, and as a result both local bodies and local branches of government agencies were having insufficient influence in decisions. Respondents with this view believed many decisions required the more discriminatory approach possible with local level administration, due to the very diverse and localized nature of many impacts associated with the enterprises.
The diversity in responses to Question Two demonstrates that appropriate designation of administrative responsibilities is a complex matter. Responses suggest that current procedures are not ideal and the current arrangements may not be capable of being made ideal without substantial modification. Possible modifications include:
- centralization of commercial recreational administration under one agency;
- redistribution of some licensing and monitoring responsibilities from present administrative authorities to the representative operator associations;
- increased involvement of local government branches and bodies in decision making; and more simply,
- greater co-ordination between those agencies which currently have administrative responsibilities in the industry.

8.2.3 Satisfaction With Current Administrative Procedures
An understanding of both the positive aspects and the problems associated with ongoing licensing and management procedures is of administrative value. Question Three therefore attempted to establish both how satisfied operators and administrators were with the present system and what particular aspects, if any, were causing discontent.

Question Three: How satisfied are you with licensing and administrative procedures?

Overall respondents appeared reasonably satisfied with ongoing licensing and administration. However, particular aspects were criticized. Notably:
- the inclusion of unsuitable licence clauses;
- lack of administrative appreciation of the enterprises' financial characteristics;
- insufficient control being given to the entrepreneurs.
- unnecessary difficulties in obtaining licences; and,
- the lack of equity in administrative procedures and licensing generally.
Each of these sources of dissatisfaction will now be referred to briefly in turn.

Respondents considered most licences contained clauses which were unsuitable. Particular clauses were described by both operators and administrators as - "petty", "irrelevant", "confusing", "unenforceable", and "unadministrable". An example is the stipulation in one licence that the national park board must approve all advertising agents. This stipulation has proved unrealistic as many advertising agencies are located overseas. In another case, it is stipulated in a licence issued for safari hunting purposes that "the agent shall not carry on any noxious, noisome, dangerous or offensive trade or business", yet safari hunting is considered all of these by some people.

The present inclusion of unsuitable clauses in licence agreements was viewed seriously by respondents. This reflects the severity of potential administrative repercussions which can be enforced in situations of non-compliance. Administrative agencies usually have official recourse to two procedures - imposition of financial penalties and termination of the licence contract. In the case of ski fields under Land Settlement Board jurisdiction, for example, the stipulated procedure in a situation of non-compliance is non-reduction of the licence fee of five percent to two and a half percent of annual gross receipts (S.20.4.b, Land Settlement Board, 1980). According to one administrator "imposing measures such as these in regard to many of the licence clauses would be totally ridiculous".

Lack of administrative understanding of both the financial structure and viability of operations was criticized by some respondents. It was suggested, for example, that the current system of levying enterprises a
Set percentage of annual gross receipts showed insufficient regard for the large differences in ratios of gross to net revenue earnings characteristic of the different enterprises. Several respondents also suggested that the high risk, low profit nature of their particular businesses was not being taken into account sufficiently.

In some cases licence agreements were criticized as being overly restrictive. Several operators suggested that as a result they were not able to either utilize their respective judgements to an appropriate extent, or to control their operations sufficiently. The stipulations in current ski field licensing policies were quoted as an example. Due to ski field leases and easements only being issued now for building sites, tow lines and access roads, ski field operators have very limited jurisdiction over the actual ski field basins. Several operators and administrators suggested that this lack of effective control over the ski basin was resulting in "a potentially dangerous situation being exacerbated". Therefore in this particular case, one administrator stipulated that safety matters (in the form of increased administrative control) needed to be given more weighting in contrast with public right of access.

The inherent difficulties involved in obtaining licences also were criticized in some instances. The majority of operators were dissatisfied with the time it took to obtain a licence - up to five years in one case. It was suggested that this unsatisfactory situation clearly indicated administrative agencies needed to both formulate policy directives for commercial recreative uses and streamline licensing procedures. Several respondents also suggested that some licences were unnecessarily difficult to acquire. Passenger service licences were commonly quoted as an example. This reflected the two aspects of 'quality of service' and 'market demand' having to be proven by the prospective operator.
Lack of uniformity and equity in licensing procedures was another source of criticism by both operators and administrators alike. This was suggested as lacking within the administration of both different sectors, and enterprises within a sector. The difference in regulative burden carried by guided trekking operations, in comparison with guided fishing operations was quoted as an example of how administrative uniformity is lacking between sectors. An example of lack of parity in administration of similar type operations is the application of different fee levy systems. Some ski fields, for example, are levied a set percentage of annual gross receipts and others are levied a flat fee per annum.

From responses to Question Three it is apparent that both operators and administrators are dissatisfied with particular licensing stipulations and administrative procedures. Revision of both licensing agreements and general commercial recreational administration therefore appears warranted.

8.2.4 Licence Detail

Licence contracts can be drawn up to different levels of complexity. Question Four was interested in which option respondents preferred, either very detailed contracts that attempted to account for all possibilities, or agreements that provided more of a framework within which ongoing licensing decisions could be made.

Question Four: How detailed should licence agreements be?

Most respondents agreed that licences should be as simple as possible, but they did so for two very different reasons. Some operators preferred less detailed licences as they assumed less administrative interference into their businesses would result. Other administrators and operators favoured general agreements because they considered "a simple framework of controls" applied specifically to each enterprise would enable more administrative
flexibility. Even those administrators who assumed their "management jobs would be harder" if licences were couched in more general terms agreed this flexibility was needed to accommodate ongoing changes in the commercial recreational industry. Decreased administrative control was not considered likely to result from less detailed contracts as both some clauses and level of clause detail were viewed as readily expendable in many agreements.

At the same time, respondents emphasized that the intended meaning of administrative policy directives, on which licence clauses were based, needed to be made clear in the context of practical application. This would ensure both initial licensing clauses and later formulated licensing details were developed in accordance with overall policy directives.

Responses suggest that future licensing would benefit by contracts being established more as licensing frameworks. This in itself is of negligible value, however, unless licence values are both more directly attuned to the individual operations and formulated more specifically to achieve policy objectives.

8.2.5 Administrative Regulation of Licensing Aspects

In licensing procedures, administrative agencies can choose either to regulate, or leave a range of operational aspects to the influence of market forces. Question Five was interested in what aspects respondents considered needed regulating.

*Question Five: What aspects should be considered in granting a recreational licence?*

With few exceptions, three factors: potential environmental impacts; effects on the general public; and, safety matters including operator experience, drew a uniform response. Most respondents generally agreed that these factors should
be considered in all licensing procedures.

Quality and pricing standards were generally considered together as they contribute jointly to the value of the service provided. Most operators believed quality and pricing of services should be left to market forces, except in a monopoly situation. According to one operator, both users themselves and tour group companies are very discerning about the value of a service offered. Administrators and several operators disagreed, believing administrative agencies should protect the public by making decisions on both pricing and quality levels.

The question of administrative appraisal of market demand and financial viability provoked considerable controversy. Views differed significantly as to whether these factors needed to be proven by the applicant. Most operators believed both factors should not be considered in a licensing application. Several operators emphasized that it was very difficult to prove demand because clients often came from diverse overseas markets and it sometimes took years to build up numbers. Some respondents suggested that these matters should be assessed, but only if the environment was to be permanently modified. Others believed they should be considered when facilities were required.

Many administrators took a contrasting stance. They suggested both demand and financial viability needed to be assessed in most cases, and particularly in situations where either a trial period was not possible, or national park areas were involved. One administrator emphasized, for example, that financial appraisals were needed to ensure "prime sites" were not locked up by entrepreneurs who had limited capital with which to develop them. In the context of national park areas, it was suggested that both existing, as opposed to potential, demand needed to be proven due to national park
policy directives. It was also suggested that the demand should relate directly to park appreciation.

If financial viability had to be proven, one operator suggested it should be subject to an independent appraisal by a recognised chartered accountant, and not left to the judgement of a land administering authority.

A range of opinions also was expressed as to whether the continuing viability of existing operations needed to be considered during assessment of an application. Some operators believed the viability of existing enterprises should be a central issue in assessing any future application. This was due to both the considerable financial investment involved, and their need for security in obtaining additional development finance. Most operators with this attitude supported the two concepts of exclusive operator areas and existing concessionaires having preferential rights to new developments. Other operators firmly disagreed with a "protectionist" approach as they believed efficiently run recreational enterprises should not require protection as a matter of policy.

Administrative views towards this issue depended to a considerable extent on the land designation involved. In non-national park areas, administrators differed in their views regarding the appropriate approach. Some believed existing operations should be protected if large scale investment was involved, while others did not accept this as being sufficient reason to stifle new developments. In national park areas, administrators generally supported the concept of protected 'prime concessionaires'. They favoured this option more as a means of both simplifying park management and controlling development, than of protecting the actual viability of enterprises. At the same time, most administrators and a few operators agreed that a 'second tier' of commercial operators should be allowed into national park areas in those activities which were
acceptable in amateur form (eg climbing, trekking, canoeing). This was providing the operators were both non-resident in the parks, and could prove demand beyond that being catered for by any existing concessionaires. They were also expected to be either self sufficient, or restrict their use of public facilities to those that were under-utilized.

The wide range of responses generated by the question reflect the diversity within the industry itself. They suggest that whether particular aspects need to be regarded in a licence application depends on both the characteristics of the operation proposed and the land designation involved. Administrators therefore need to differentiate in the way they assess commercial recreational proposals according to these two factors.

8.2.6 Licence Fees
Licensed commercial operators traditionally have been levied some form of fee. Question Six identified respondents attitudes towards:
- the levying of a fee itself;
- the rationale behind fee establishment; and,
- the appropriateness of different systems of fee computation.

Question Six: Should licence fees be set, and if so, how should they be established?

Most respondents supported paying a recreational licence fee. However, there was significant disagreement both as to what the fee should cover and how it should be set. Many operators believed it should relate to administrative costs only, and not be used as an additional tax. On this basis two operators considered it appropriate that fees were higher in national park areas due to the correspondingly higher administrative costs incurred in these areas.
Other respondents supported the alternative view that recreational licence fees should be used to generate public revenue. Reasons given were that the enterprise capitalized on the land resource and sometimes this process negatively impacted both the environment and the experience of other user groups.

At the same time, most respondents suggested the fee set should not be unreasonable and so act as a disincentive to the further development of the industry. This perspective reflects the public benefits generated by the industry:
- foreign exchange earnings;
- increased diversification in mountain areas; and,
- the fulfilment of public recreative demands.

Under the present system, small scale and recently established enterprises are charged a flat annual rate. Larger enterprises are charged a percentage of gross receipts. In many sectors the amount levied is, in theory, five percent reducible to two and a half percent of average gross revenue earnings in the preceding three years. Respondents frequently questioned the administrative rationale for levying such a set percentage of gross receipts.

According to respondents the present system does not appear to be working, despite being simple and easily verifiable. Most operators are, for a range of reasons, currently being levied at either a lower scale than that suggested in policy statements, or they are continuing to pay a set fee. Due to the financial characteristics of many enterprises the percentage of gross revenue payment has had to be deferred for long periods - up to twenty years in one case.
Many respondents also were highly critical of the present system. The major criticism of this system was its lack of equity as it takes no account of the ratio of net to gross earnings when applied. One inherent inequality, for example, is the lower fee that licensed operators face when they subcontract out services on a commission basis. Subcontracting results in a lesser proportion of gross revenue being derived from the licensed undertaking, and hence a lower levy.

Air service enterprises in particular were highly critical of this method. Several stated that a levy such as two and a half percent of gross receipts was a "ridiculous" amount in regard to their sector as it was totally out of proportion with the privilege of landing on an airstrip. In commenting on this matter three factors were emphasized:
- very little revenue is generated from the actual landing strip itself;
- non-recreational services account for part of the gross revenue earned; and,
- twenty to twenty-five percent of gross revenue was already being paid to the Ministry of Transport and the Air Services Licensing Authority in airport dues, domestic air travel taxes, aviation fuel taxes, ... etc.

Some operators offering other types of recreational activities also agreed that in their sectors levying a percentage of gross receipts was inappropriate. Several respondents criticized this system on the general basis that it did not relate to the value of the land resource being used, but instead to their expertise and efficiency in utilizing the resource. They therefore believed the levy was acting as a disincentive to further development.

The existing levy was also criticized because it did not take adequate account of revenue generated outside of the mountain lands. One operator cited, for example, that in his particular operation a proportion of gross receipts related to costs incurred in hotel expenses, travel to the mountain
land areas ... etc. Respondents therefore emphasized that the fee levied should relate to both the value and use of the public land area only.

In commenting on this issue some operators suggested their attitude towards a recreational fee would be totally different if the income generated from levies was made available to the industry as some form of development finance. This reflected the significant problems many operators were experiencing in obtaining development finance both from finance bodies generally and the Development Finance Corporation.

However, several operators were satisfied with the present system. In most cases these particular entrepreneurs controlled operations which either had a very low ratio of gross revenue to net revenue earnings, were too small to be levied in this manner, or required exclusive land areas.

Respondents also suggested other ways of determining levies. Alternatives suggested to levying a percentage of gross receipts included charging:

- a set fee per annum (adjusted for inflation);
- a percentage of annual net revenue earned;
- a flat fee either per client or per client day (adjusted for inflation);
- a percentage of the service fee charged; and,
- a set percentage of guide wages.

In establishing the actual amounts to be levied, some respondents suggested 'a sliding scale' should be used. The scale could be set according to factors such as: profit margins; public facilities used; maintenance costs; administrative costs; environmental impacts; and, direct effects on the general public.
Directly relating the fee levied to the land value was another approach suggested especially for areas designated 'leasehold' and 'unoccupied crown land'. The usual commercial rental rate could be used, for example, in establishing a fee on a land value basis. Two administrators, however, suggested that a separate recreational fee would not be necessary as it could be incorporated into the general leasehold rental. This proposal reflects the policy change outlined in the Land Act Amendment (1979) as under the Amendment leasehold areas are rented now on a 'land exclusive of improvement' basis, instead of on stock carrying capacity.

It is apparent from respondents comments that there is a considerable degree of dissatisfaction with the present system of levying recreational fees. This is attributable to the present system proving to be both inappropriate, and inequitable in many instances. Prior to implementing recreational fees, administrators therefore need to firmly establish both what their objectives are in levying the industry, and to differentiate to a much greater extent between commercial recreational sectors according to their respective financial structures. On this basis it can then be established which system of levying fees is the most equitable and appropriate in a particular situation.

8.2.7 Licence Tenure

Length of tenure is a significant issue. It determines when administrative agencies are able both to alter licensing stipulations in response to changing circumstances, and to terminate the operations of conforming concessionaires. In this context, Question Seven explored the basis on which respondents believed licence length should be set and for what reasons, if any, preferential rights of renewal should be granted.
Question Seven: What are the appropriate lengths of trial periods, review periods and licence contracts, and what is your attitude to rights of renewal?

In replying to this question, respondents tended to differentiate between large and small scale operations. This reflected general agreement amongst respondents that licence length should correspond with the level of financial investment involved. With the exception of trial periods, comments concerning the three other aspects of licence tenure tended to be very interrelated (eg regular review periods were usually recommended in association with long licence agreements). The question also elicited rather different responses from the administrative and operator sectors, particularly in regard to contract lengths for large scale enterprises. These differences in attitude are outlined in the discussion which follows.

The issue of trial periods generated the most uniform responses. With few exceptions, respondents favoured the implementation of trial periods in all suitable cases. Terms suggested ranged from one to five years, depending on the size of the enterprise involved. Trial periods were supported as a useful means of assessing enterprise demand and viability at a stage when there were fewer difficulties involved in cancelling licence agreements if this proved necessary. In some commercial operations, however, assessment stages were not considered feasible. This was due to either requirements for permanent facilities, the involvement of large scale investment, or the need for permanent modification to the environment. One administrator suggested that in those situations some form of bond should be imposed to ensure compliance with development conditions.

Administrators and operators both had similar approaches to the questions of actual length of licence agreements and rights of renewal in regard to small scale enterprises. A licence length of approximately five years was
suggested by many administrators as appropriate for those smaller scale enterprises which did not either require facilities, or produce permanent environmental effects. Most operators agreed with this general approach, although they suggested licence terms needed to be longer when considerable investment was involved in vehicles and equipment. Licence terms of seven to ten years were proposed in this instance. Both sectors did not consider small scale businesses required either review periods or preferential rights of renewal. This reflected both the relatively short lengths of licence tenure and the value of the business depending mainly on the 'good will' established, respectively.

With large scale enterprises responses differed considerably regarding both the length of licence agreement which was appropriate and the question of automatic rights of renewal. Most administrators supported long licence periods, ranging from twenty to thirty years. This was provided agreements were subject to review every three to seven years and no automatic rights of renewal existed. Short term review periods were considered necessary to account for the current high rates of inflation and the rapid changes in recreational and tourism patterns. Operators differed amongst themselves as to the preferable approach for those large scale enterprises requiring substantial investment and fixed facilities. Most favoured shorter licence periods, between five to ten years with permanent rights of renewal. Operators proposed that with this approach, periodic reviews generally should not be necessary, (but if they were undertaken they should occur approximately every three to five years). Other operators wanted both long licence periods and automatic rights of renewal. A few, however, disagreed with the granting of rights of renewal on an automatic basis. They suggested it would both encourage operators "to sit on their laurels" and result in public land areas being locked up indefinitely.
Despite these differences in approaches, it is apparent that both operators and administrators are aware of the importance of licence contracts in providing operators with a level of ongoing security. This is needed to both encourage private sector development of facilities, and to enable development finance to be obtained. One operator stipulated, for example, that a ten year lease contract was the minimum necessary before it could be used as a security asset in raising development finance.

Together the responses suggest that in establishing licence terms, administrative agencies should carefully balance the operators' requirements for security with their own need to retain control. In this process agencies also need to ensure they retain sufficient licencing flexibility so that they are capable of modifying licence agreements in response to changing circumstances.

8.2.8 Access Rights

Both private and commercially guided recreationists utilize publicly provided facilities. Respondents therefore were questioned about what the respective access rights of these two sectors should be.

Question Eight: What is the appropriate administrative approach towards private sector use of public facilities?

Both operators and administrators agreed that private sector use of public facilities, such as wharves, roads, tracks and huts, should not be to the detriment of the general public. Views however diverged as to what this concept meant in the context of specific cases. In particular, two popular topics of conversation - the Mt Cook airport access road, and use of public huts - were often referred to.
The central controversy concerning the airport access road involves responsibility for its maintenance. Specifically, should it be maintained by Mt Cook Lines, because this company generated almost all the traffic using the road, or the land administering authority, which owned the land? This conflict suggests that private sector maintenance responsibilities for public facilities used need to be clearly stipulated in licence agreements.

The appropriateness of actual private sector use of public facilities was considered in regard to the public hut use issue. The stances of operators and administrators on this issue differ significantly, and these are outlined in turn.

The guiding operators involved believed they should be able to use public huts on the same basis as the general public. Their reasons were that their clients were either New Zealand citizens with a right to use the facilities, or they were overseas visitors bringing valuable foreign exchange into New Zealand. If overcrowding of huts became a problem, operators suggested they should be able to provide alternative private facilities. Other less favoured suggestions included the implementation of either some form of booking system, or limitations upon the size of commercial parties.

Most administrators also supported the concept of private sector use of public facilities. However, with regard to the specific issue of hut use, their views diverged. They ranged from the belief that commercial operators should have equal rights of access as long as overcrowding problems did not occur, to the stipulation that public huts should only be used in emergencies. If overcrowding became a source of conflict with non-commercial recreationists, most administrators agreed that operators should be permitted to construct their own facilities, provided they were not to be located in national and state forest parks. Within park areas, administrators suggested private
facilities should only be permitted if they were judged, "both appropriate and necessary" and if the general public gained in some way from the development.

Responses suggest that administrators, when licensing an operation, should clearly state what maintenance responsibilities an operator has in regard to any public facilities used. Administrators also need to assume at the licensing stage that the activity proposed will increase in scale. They might also wish to consider whether the activity will still be an 'appropriate' use for the land designation on a larger scale. This is important because licences are usually very difficult to revoke once the service is operational. Further, they need to have considered at the licensing stage what alternatives are acceptable if conflicts do occur in the use of public facilities. In making this decision both the issues of both private sector use of public facilities and private provision of facilities in public areas should be considered together. This is particularly important in operations such as guided climbing and nordic skiing, as temporary accommodation is not a viable option and management options thus are very limited when crowding problems occur.

8.2.9 Commercial Service Provision

Both public and private sectors offer recreative services in the South Island mountain lands. This final question sought respondents' attitudes on direct involvement in the industry by the two sectors.

Question Nine: What is your attitude towards both public and private provision of commercial recreational services?

All respondents were against public agencies having any preferential role in the provision of commercial recreational services. They favoured private sector involvement in the industry and suggested public provision of services
should be limited to those areas where it was in the national interest for services to be provided, but not economical for the private sector to do so.

Reasons for this included the beliefs that:
- the public agencies would be placed in a privileged position and unfair competition would result;
- public bodies have much less pressure on them to be efficient;
- many services require very specialized management expertise; and,
- most services are more suited to the "personal front approach" associated with small scale operations.

Most operators also considered existing governmental owned activities should be returned to the private sector as soon as they proved viable. A few operators, and some administrators, disagreed however. They did not perceive any additional benefit from a return to private ownership.

The implication of responses is that it is clearly inappropriate for Government to continue favouring Tourist Hotel Corporation involvement in the industry, as allowed for under the Tourist Hotel Corporation Act, 1963. Under this act the Corporation has jurisdiction to establish launches, mountain huts, guiding services, ski tows and other commercial recreational facilities on behalf of the Crown (S.7.2, Tourist Hotel Corporation Act, 1963).

8.3 IMPLICATIONS

Respondents' comments suggested that many aspects of current administration are inappropriate. In most cases this reflects administrative agencies generally failing to appreciate the complex and changing nature of the industry. Further, when implementing regulative procedures administrative
agencies sometimes do not appear to relate those procedures sufficiently to their respective policy objectives, and even in some cases to the practical effects of application. Certain administrative issues now will be examined further:

(i) **Co-ordination and Representation** - the current sufficiency of both in administration of the industry.

(ii) **Degree of Regulation** - what level is appropriate in the industry? Both which, and in what situations should particular aspects be either regulated or left to market forces?

(iii) **Length of Tenure** - what terms of trial and review periods, actual licence contracts and access to rights of renewal are suitable?

(iv) **Licence Fees** - should fees be levied and, if so, on what basis and by which method?

(v) **Conflict between Commercial and Private Recreationists** - what should their rights be respectively and how should conflicts be resolved?

In Chapter Nine each of these issues is discussed in greater detail and recommendations are made.
CHAPTER NINE

ISSUES AND IMPLICATIONS

9.1 INTRODUCTION

The principle issues facing management of the commercial recreational industry have been identified in the previous section. Several of these issues are now taken up and considered in greater detail. In developing the sections that follow, responses to survey questions have been further extended by discussions with individuals in industry and in administrative positions. The information and opinions provided from both the case study research and these further discussions have guided the development of the following sections.

Commercial recreative activities are not unique to New Zealand. A number of other countries (notably the United States of America) have experienced the difficulties associated with effective management of commercial recreation. Some overseas experiences are instructive. When appropriate, therefore, discussions of relevant overseas experience also have been included in the following chapter.

9.2 ADMINISTRATIVE ISSUES

9.2.1 Issue One: Existing Regulation Lacks Co-ordination and Industry Representation

A large number of public agencies influence the commercial recreational industry. The fragmentation of authority between these agencies has resulted in two problems: insufficient co-ordination between agencies and lack of adequate and appropriate involvement by some sectors in decision making. The resulting problems are most apparent in four areas:
- co-ordination is lacking between national level agencies with marketing, administrative and financial influence in the industry;
- co-operation is lacking between administrative agencies per se, and this is particularly apparent at the regional level;
- local level administrators have insufficient direct involvement in decision making; and,
- the industry itself lacks sufficient involvement in an advisory capacity.

Each of these four areas requiring administrative attention will be discussed in turn.

First, effective co-ordination is needed between those national level agencies that have a significant capacity to influencing marketing, financing and administration of the commercial recreational industry. This is to ensure that respective goals are complimentary and to lessen any likelihood of the agencies working at cross purposes.

At present, there is minimal contact between these agencies with the exception of "informal advice swapping". There is, for example, very limited communication between the Departments of Lands and Survey and Tourist and Publicity despite the Tourist and Publicity Department's role in generating a significant proportion of national park use. It also seems inappropriate that while the Tourist and Publicity Department continues to market New Zealand's recreative opportunities overseas, many operators are having difficulty in raising the finance necessary to develop these same recreative services to acceptable overseas standards. Marketing, administration and financing are only three aspects of the existing industry that require co-ordination of policy and action by a range of departments.

Lack of co-ordination is also a characteristic feature of the administrative agencies per se. The two main agencies involved in administering the
commercial recreational industry are the New Zealand Forest Service and
the Department of Lands and Survey. Other agencies involved include: the
National Parks and Reserves Authority; Land Settlement Board; National
Water and Soil Conservation Organization; Wildlife Service of the Department
of Internal Affairs; Ministry of Transport; Ministry of Agriculture and
Fisheries; Air Services Licensing Authority; regional catchment authorities;
regional councils; and, local councils.

The large number of agencies involved in administration reflects both the
industry's inherent diversity of component enterprises and the very 'ad hoc'
manner in which responsibility for regulation has been designated.

The high degree of fragmentation in administration inevitably has encouraged
limited co-operation, and in many cases, actual conflict between those
agencies involved in recreational management (Aukerman, 1979). Lack of
administrative co-operation simultaneously has resulted in some industry
sectors being heavily regulated, and others being disregarded. Sectors in
which administrative responsibilities appear to overlap include scenic
flights, heli-skiing and safari hunting. This has resulted in both
frustration for the operators and a potential source of conflict for the
administrative agencies involved. At the same time, potentially high
risk activities such as jet boating and rafting currently are not subject
to any mandatory administrative procedures. In regard to both effects,
agencies therefore need to:

- clarify their respective areas of jurisdiction;

- ensure all enterprises requiring public administration are in fact
  regulated; and

- ensure that their policies and administrative procedures are complementary
  with those of other agencies involved in the industry.
These observations also suggest that the current manner in which individual departmental policies are formulated independently of other involved regulatory bodies is no longer appropriate. The land administering agencies, for example, do not appear to have made any contribution to the Domestic Air Services Policy (1982), yet scenic flight services have considerable impact in land areas such as national parks.

Greater co-operation between agencies is required especially on a regional basis, for three reasons:
- the multiple land designations applied to areas used by many services;
- the extent of interdependence within the industry on a regional basis; and,
- the regional scale impacts of larger operations.

Administrative co-operation at a regional level is particularly significant in ensuring that those land areas with more restrictive designations such as national parks are protected from activities in adjacent areas. A more co-ordinated 'over-view' approach in administering the industry therefore would be of benefit at this level.

One important component of providing a regional emphasis to regulation is by empowering local agencies, such as local authorities and local branches of government departments, with greater responsibility for the management of commercial recreation. The high level of diversity within the industry also is more likely to be taken into account through greater decentralization, as local level agencies have more direct contact with the actual enterprises. If this is to be done, local level agencies will require more direct influence upon national level policy generation, and it may ultimately be more appropriate for administrative details (such as details of licence agreements) to be formulated at a local level.
It also is apparent from the information presented in this study that current administration of the commercial recreational industry would benefit from increased involvement of the industry itself, particularly in the form of professional operator associations. Representation is needed to ensure that two key characteristics of the industry identified here are adequately catered for, both in policy and in practice. The key characteristics are the great diversity of activities provided, and the very specialised nature of many of those activities. Appropriate tasks for industry representatives include the formulation and monitoring of standards for such things as experience and client safety. In Alaska, for example, the professional hunting guides association assesses the guides' level of proficiency by monitoring clients' complaints.

However, it is also important that the private sector contribution is restricted to advisory and monitoring roles only. It is unrealistic to expect operators to be unbiased in their judgements of competitors' operations; a factor which has been confirmed by past overseas experiences, especially in the United States. For example, during the 1970's, concessionaires became directly involved in concessionaire planning in two North American parks - Yosemite and Crater Lake. Direct involvement led to the concessionaires promoting their own interests in assessing proposed park development. This was later judged to be at the expense of a wide spectrum of both current and future park users (Mantell, 1979). The Comptroller General accordingly recommended that concessionaires should not have more influence in park planning than either the general public or special interest groups (General Accounting Office, 1980).

**Implications**

(i) More contact is needed between government departments and corporations with influence in the industry to ensure their roles are co-ordinated.
(ii) Greater co-ordination is needed between the administrative agencies per se, to ensure that:
- administrative responsibilities do not overlap;
- all sectors of the commercial recreational industry are adequately administered; and,
- decisions made by individual departments are complementary on a regional basis.

(iii) A greater contribution to decision making is needed from local level agencies due to the considerable local impacts of many enterprises.

(iv) More official involvement of professional associations is warranted in both advisory and monitory capacities due to the complex and specialized nature of the industry.

(v) The involvement of professional associations should not extend to actual planning because the agencies have a strong inherent bias towards commercial recreational development.

9.2.2 Issue Two: Extent of Administrative Involvement

Many aspects of the commercial recreational industry are assessed and monitored by administrative agencies. Aspects of the industry in which administrative agencies frequently are involved include: environmental protection; operator experience; safety standards; impacts on other user groups; relationship to environmental appreciation; finance availability; market demand; quality standards; pricing levels; and, effects on existing operators.

Administrative responsibilities in these areas are usually designated when market forces are judged to be either an unsuitable form of regulative control, or incapable of adequately regulating particular aspects of the industry.
The aspects regulated in individual cases depend to a considerable extent on the nature of the actual enterprise and the land designation involved. The issue of environmental appreciation usually is considered, for example, in regard to national and state forest parks only.

In assessing whether to regulate particular aspects, administrative agencies need to relate potential public gains (e.g., safer services, minimized environmental damage), with their very real costs associated with regulation. One substantial cost incurred as a result of administrative involvement is the expenditure of management resources in both licensing development and subsequent monitoring. Another is the potential impediment to private sector development which can result from the application of superfluous regulations.

Therefore, in regard to each of the many aspects of commercial recreational enterprises outlined above, a degree of controversy exists regarding the appropriate level of public sector involvement. Three aspects in particular emerge from this study as being contentious. They are, administrative:

- consideration of development finance availability and consumer demand at the licensing stage;
- regulation of quality and pricing standards; and,
- protection of existing operations.

Administrative involvement in each of these three areas will now be discussed in turn.

Assessment of Development Capital and Recreational Demand

Attitudes to administrative assessment of the related issues of market demand and finance availability range from totally against, to totally favouring this form of involvement. Those who consider assessments unnecessary argue that both factors are more appropriately left to regulation by the market
place. Many operators, in particular, stress that entrepreneurs are not going to invest in a development unless they have the necessary finance available and are assured market demand is adequate. Those who favour regulation argue that the public sector has a responsibility to assess both factors as a consequence of its general 'guardianship' role in the mountain lands. Consequently, it is argued, available finance should be reviewed to ensure enterprise proposals are capable of being developed as proposed in licence applications.

Assessment of potential market demand is favoured for more complex reasons. Its assessment is considered necessary to ensure that:
- the prospective enterprise is likely to be financially viable;
- the demand generated will not exceed the 'psychological and physical carrying capacity' of a particular area; and,
- the meeting of market demand in a particular area is in keeping with associated policy objectives.

Many of the points made both in favour of and against regulation of this kind appear to have merit. In balancing these points of view it therefore appears reasonable to propose that availability of finance and potential demand should be considered in certain situations, irrespective of land tenure. They should be assessed whenever either permanent modifications to the environment are involved in a proposal, or 'prime' sites are to be effectively 'locked up' by a development. If this were done, it would permit operators to be free of regulative control of both aspects, except in situations where substantive costs could be incurred.

Administrative assessment of development capital and recreational demand appears necessary in these two situations to ensure that both the environment is not modified by developments unlikely to become either fully
operational, or financially viable, and valuable recreative land resources are not under-utilized. Assessment of both factors prior to actual development also would lessen the risk of public resources having to be expended in 'cleaning up' after failed operations.

In national park areas the matter of market demand required administrative assessment for further reasons. Existing national park policy directives require that proposed developments be evaluated as to their necessity (S.8.5, National Parks and Reserves Authority, 1982), and that public access to parks be for the enjoyment of 'natural features' only (S.4.e, National Parks Act, 1980). On this basis existing, as opposed to potential, demand for a service must be proven. Qualitative aspects of recreational demand must also be considered. This is to ensure both the 'necessity' of the proposed service and its 'appropriateness' in facilitating the enjoyment of 'natural features'. Mantell (1979) acknowledges this point in his recommendation that commercial activities should only be permitted if they fulfil demands which relate to the park environment itself, and not primarily to either constructed facilities, or mechanized transport.

**Implications**

(i) Finance availability and market demand require assessment at the licensing stage in two situations:
- when environmental modifications are associated with the proposal; and,
- when land areas are required on an exclusive basis by a prospective enterprise.

(ii) Demand aspects also need general consideration to ensure both the scale and type of use generated is compatible with the land designation. This particularly is needed in areas designated as national parks.
Assessment of Quality and Pricing Standards

Involvement of administrative agencies in monitoring service quality and pricing is another area of controversy. There are two circumstances, however, when this appears to be necessary in order to protect the interest of the general public:

- when operators are unable to compete freely due to protectionist administrative policies; and,

- when market place competition is incompatible with policy objectives of the land designation.

In national park areas, for example, administrators have a strong case for regulating both quality and pricing because both situations above apply. Operators are unable to compete freely as only a limited number of concessionaires are granted licences. The two main policy objectives for park managers, 'preservation in perpetuity' and 'public use' (S.4 National Parks Act, 1980), are incompatible with market force regulation.

In the United States of America, administrative regulation of concessionaire pricing and quality has been recommended (Mantell, 1979; Frome, 1981; Williams, 1981). The emergence of this recommendation reflects an era of high priced, low quality services being offered by some concessionaires in the absence of both adequate service competition and monitoring. Frome (1981) and Williams (1981) both cite examples in three American national parks where substantial concessions have developed in the absence of adequate administrative regulation.

In New Zealand's non-national park areas quality and pricing levels usually are left to the market place. However, in these areas also, administrators have a case for retaining a right to ensure that market forces are acting in a suitably regulatory manner. With the emergence of professional operator
groups in New Zealand, for instance, it is apparent that operators are now tending to co-operate to a greater extent. Co-operation has the potential to lead towards standardisation of levels of both price and quality. This in turn may lead towards a reduction in market place competition which may not necessarily be to the benefit of the general public.

In situations where administrative agencies are responsible for quality and pricing levels, a clear understanding is required of the needs, wants and desires of the different recreative sectors. Sectors have very differing views as to what quality and price of a service constitute acceptable value. According to Aukerman and Davison (1980), "While the popular image is a demand for sophistication and expensiveness, there may also be a demand for simplicity of style." These views need to be understood - and implemented where appropriate - through administrative policy. Therefore, in situations where it is desirable that administrative agencies take a 'watch dog' role in pricing and quality standards, it is important that the diverse nature of the market being provided for is recognised and understood.

**Implications**

(i) Pricing and quality levels needs to be controlled either when operations are unable to compete freely, or when market place determination is incompatible with policy objectives.

(ii) In regulating these factors due regard should be given to the wide ranging needs of the different recreative sectors.

**Concessionaire Protectionism**

The protection of existing concessionaires by administrative agencies is the third major source of controversy. Administrative protection ranges from preferential treatment of existing operations on an informal basis, to actual policy directives that existing concessionaires be protected
To some extent, protection is associated with all mountain land designations, however, it is mainly associated with national park areas. This following discussion therefore focuses on concession management within the national park setting. In national parks the favouring of 'prime' concessionaire management recently has been proposed (S.25.5 National Parks and Reserves Authority Draft general policy, 1982). If implemented, this proposal would result in the protection of existing concessionaires being a policy directive. In considering the implications of such a directive, the following aspects of concessionaire protectionism now are discussed:

- administrative methods used to protect (and to actively promote) existing concessionaires;
- the potential costs and benefits stemming from administrative involvement;
- North American experience in concessionaire protectionism, particularly in the form of 'prime' concessionaire promotion; and,
- the appropriateness of promoting 'prime' concessionaires in New Zealand's national parks as a matter of policy.

The most common methods currently employed to both protect and promote existing concessionaires include:
- making prospective operators prove demand over and above that already being catered for;
- giving incumbent operators first opportunity to provide new or expanded services;
- offering preferential financial measures (eg reduction of franchise fees, granting of possessory rights);
- granting preferential rights of contract renewal; and,
- granting exclusive rights of service provision.
The use of any, or all of these administrative practices has the potential for widespread implications, including both positive and negative effects. All parties involved in commercial recreation - public administrators, operators and clients - can be affected by protectionist policies.

Potential benefits from the protection of existing concessionaires include:
- greater continuity and regularity of services provided to the public;
- less fragmentation and duplication of 'back up' services and facilities required, (this only applies when resident concessionaires are associated);
- less administrative problems as a result of fewer operations and increased continuity of services offered; and,
- increased security for operators and thus encouragement of private sector investment.

Potential costs associated with the reduction in 'market mechanisms' resulting from concessionaire protection include:
- stifling of private sector initiative;
- retention of inefficient and marginal services;
- lack of choice in services available to users;
- increased probability of both low quality and over-priced services being provided; and,
- the potential for growth of large, monopolistic companies with enough power and influence to create 'management' problems for regulative agencies.

Larger operations usually acquire a degree of 'political' influence. This influence can detract from the extent of effective control which administrative agencies have over smaller enterprises.

In balancing the many benefits and costs associated with administrative protection of concessionaires, North American experience is instructive.
In the United States of America, concessions are protected to a considerable degree from both direct competition with prospective concessionaires and financial loss. The Concessions Policy Act (1965) authorizes the National Park Service to have a single concessionaire operating all similar services and facilities in a given park area. Significant administrative problems have developed since the introduction of this act (Mantell, 1979; Fromé, 1981; General Accounting Office, 1980). The resulting absence of competition has caused, in some instances, low quality and high priced services to be offered to the public. Yet due to the large size of the concessionaire conglomerates that have resulted from these policies, the National Park Service has often been unable to enforce licence contracts. Frequently, the only solution has been to terminate the contract. Termination of large conglomerate contracts has proved to be expensive, time consuming and disruptive of visitor services (General Accounting Office, 1980). As a result of these experiences, the Comptroller General recommended that concessionaires should not be protected and given preferential rights as a matter of policy (General Accounting Office, 1980).

Some understanding of North American experience with 'prime' concessionaires is of value in formulating national park policies in New Zealand. It suggests that New Zealand administrators may need to give greater consideration to the potential problems associated with policies that provide protection for existing operations.

In addition to the problems outlined above, a general policy of protecting concessions suffers from the difficulty that it is a broad and significant criterion applied to an industry characterized by extreme diversity. The point has already been made here that the diversity within the commercial recreational industry requires a matching diversity of policy and administration. It is therefore unlikely that any single policy item as far
reaching in its implications as that of protection of 'prime' concessionnaires will be in the best interests of administration, the industry's clients and the industry as a whole.

On this basis it appears appropriate that protection of existing operations in national park areas be considered in a more flexible manner than that currently being proposed in the National Parks and Reserves Authority Draft Policy Statement (1982).

Implications

(i) A natural area intending to be preserved is not the proper place for rigorous market place competition. However, protecting existing operators, and the associated issue of promoting 'prime' concessionaire management should be undertaken in a flexible manner. Each situation requires evaluation independently due to the complex nature of the industry per se, and the wide range of potential costs and benefits associated with administrative protection.

9.2.3 Issue Three: Length of Tenure

Length of licence tenure is a significant issue in the administration of the commercial recreational industry. To an extent, it determines the flexibility in ongoing administrative control by regulating when conforming licence contracts are able to be either modified, or terminated.

Length of tenure is an equally significant issue from the industry's perspective. In particular it has a profound influence upon the financial security of commercial recreational enterprises.
Any attempt to resolve these public and private sector needs for flexibility and security respectively requires careful consideration of the four contributory issues - trial periods; length of actual licence agreements, review periods, and access to rights of renewal.

In establishing tenure length, administrative agencies have four main objectives:
- to retain licensing flexibility so that effective control over the industry is ensured despite changing circumstances;
- to optimise the administrative resources spent on reassessing and renewing licence agreements;
- to enable, and in some cases encourage, both private sector development and investment in recreative services and facilities; and,
- to encourage continuity in the provision of recreative services.

At the same time, operators are primarily concerned with maximizing their level of licence security. They require security for three main reasons:
- to protect resources currently invested in their respective enterprises;
- to enable confident forward planning of operations; and,
- to enable development capital to be raised to finance any further expansion and upgrading of facilities and services.

All four components of licence tenure: trial periods; actual contract length; review periods and preferential rights of renewal have different roles in meeting these respective objectives outlined above. Each component is now discussed in turn.

**Trial Periods**

Trial period implementation is favoured (wherever possible) due to the inherent regulative flexibility of this form of licensing. In implementing
trial periods, administrative agencies obtain an opportunity to assess an enterprise at a stage when termination is less damaging for all parties should it prove necessary. It also provides operators with an opportunity to 'prove their case'.

The extent of flexibility provided by trial periods, however, is deceptive. Once an operation is licensed, even if only for a trial basis, the onus is placed on the administrative agency to justify termination. Trial periods, therefore, are not appropriate when employed as an administrative device to avoid making immediate decisions.

In fact, there are only limited situations in which trial periods can be appropriately applied. Licensing on a trial basis is not a viable option when prospective enterprises require either modifications to the environment, or substantial capital investment. Ski field entrepreneurs, for example, are not going to invest substantial capital on a trial period basis as the licensing security provided is not commensurate with the investment risk.

In situations where trial periods are considered a viable option, length of tenure could be established according to:
- the proposed level of investment; and,
- the period needed to provide a clear indication of the potential viability and effects of an operation.

Together, both criteria suggest that trial periods should be of several years' duration in most cases. This factor reflects the industry's characteristics. Considerable investment usually is involved in all enterprises, even those operated on a small scale. Most operations take a long time to become established. This reflects both prospective clients being scattered in New Zealand and overseas, and 'word of mouth'
advertising being important in many sectors. The high level of weather dependency of most enterprises also results in client number often fluctuating significantly on an annual basis. These factors, therefore, suggest that relatively long periods are required in which to accurately assess most operations.

**Implications**

(i) Trial periods appear useful in assessing those enterprises that require neither substantial investment nor environmental modifications.

(ii) When trial periods appear appropriate in terms of (i) above, the length of the trial should be commensurate with both the financial risk undertaken by the developer and the regulative agencies requirements for an 'accurate' assessment.

(iii) Trial periods are not an effective substitute for careful evaluation of enterprises at the initial licensing stage.

**Length of Licence Agreements**

The length of tenure of licence agreements is an important issue for both administrative agencies and operators, as outlined previously. However, licence length appears to be of relatively greater significance for the industry. This reflects administrative agencies being able to procure their particular needs for licensing flexibility through other means - trial and review periods.

The industry's security needs differ considerably depending on the level of investment associated. On this basis the following licensing terms have been tentatively suggested as commensurate with the financial security requirements of different scale enterprises:
- five year terms for enterprises requiring low levels of investment, no permanent facilities;
- seven to ten year terms for enterprises requiring medium levels of investment (eg in vehicles, expensive equipment), no permanent facilities; and,
- twenty to thirty year terms for enterprises requiring high levels of investment, permanent facilities and in most instances environmental modification.

**Implications**

(i) Licence periods should differ in length according to the security needs, and thus the different levels of investment involved in respective enterprises.

(ii) At the same time, to ensure regulative flexibility is not lessened unnecessarily, administrative agencies need to make certain the length of tenure granted does not exceed the financial security requirements of the enterprise concerned. Security requirements, therefore need to be further researched.

**Review Periods**

In longer licence contracts the regulative flexibility provided by review periods is vital. They are a particularly important means of preventing licence fees levied from declining in real value over time. Their implementation also is useful in monitoring the industry generally (eg proposals for further expansion, emerging conflicts with other user groups).

In establishing review period length 'a trade-off' is made between the level of licensing flexibility desired and the expending of administrative resources. On this basis, and in regard to the high rates of inflation
currently being experienced, review periods at three to seven year intervals appear warranted.

Implications

(i) Review periods are needed at regular intervals to ensure a level of administrative flexibility is retained.

(ii) Review assessments also are required in maintaining the real value of any fees levied.

Access to Rights of Renewal

Operators often stress that preferential rights of contract renewal are needed for financial security reasons. However, it appears that granting this level of security as a matter of policy is not in the best interests of the New Zealand public. Granting preferential rights on an automatic basis potentially could result in:

- loss of administrative flexibility in land use decisions as sites would be locked up on an indefinite basis;
- discouragement and elimination of competition from other operators; and,
- less incentive for existing operators to maintain their businesses to suitable standards, due to assurance of contract renewal.

These factors, plus the very real need for New Zealanders to maintain flexibility in future land use options, suggest that in applications for rights of renewal each operation should be considered individually.

Implications

(i) The importance of the mountain lands as a resource base for both recreative and other uses is increasing. Automatic rights of renewal therefore should not be granted,
9.2.4 **Issue Four : Application of Licence Fees**

Most commercial recreational enterprises currently are levied some form of licence fee. In the case of small and recently established operations an annual flat fee is usual. Larger scale operations are normally charged a set percentage of their annual gross receipts.

The present two tier system, however, is proving to be inconsistent and inequitable when applied. This appears to reflect both a lack of clear rationale behind establishing fees and a lack of understanding of financial characteristics of the different commercial recreational sectors. The following question therefore needs further consideration:

*What factors, if any, should be taken into account in levying licence fees, and stemming from this, how can these factors be incorporated into fee computation?*

In examining this issue four aspects are discussed:
- the current objectives in levying fees;
- the suitability of the present system in meeting these objectives;
- North American experience in fee computation; and,
- alternatives which exist to the present system.

Currently, there appears to be two common rationales cited for the imposition of fees upon commercial recreational enterprises. These are, firstly the maximizing of public revenue generated, and secondly, compensation for public costs incurred. Those emphasizing the first objective believe that as concessionaires are using public land area for private gain, they should return to the public purse as much as is feasible. Others argue that the use of licence fees as a compensatory 'tax' is both inappropriate and does little to maximize public benefits.
They cite the wide range of direct and indirect benefits to the public which derive from the commercial provision of recreative services. Benefits include:

- an increase in recreative opportunities available;
- the earning of overseas funds;
- the stimulation of regional economies; and,
- the provision of employment opportunities in often 'slow growth' isolated areas.

As a consequent of these benefits (it is argued) licences fees should relate to costs incurred only. Costs associated with commercial provision of recreative services include:

- negative impacts on the environment and other user groups (eg noise pollution, access road damage);
- the foregoing of other land use options (ie opportunity costs); and,
- a need for administrative regulation.

Under the present two tiered fee system, it would appear that neither the objective of maximizing public revenue generated, or that of compensation for direct costs incurred, is being met. Neither method of levying larger enterprises percentage of annual gross receipts and small enterprises a flat annual fee relate either to the impacts derived from an enterprise, or to the financial privileges gained from procuring a recreational licence. A levy on gross receipts, for example, has little bearing on profitability. This is a significant factor in levying the industry due to the very real differences in financial structure of operations. The ratio of gross to net revenue generated, for example, differs greatly according to the service offered. Disregard for this ratio suggests inequity in existing fees being set.
In the United States of America, the concessionaire fee system is very similar to that currently operating in New Zealand. Large enterprises are levied a set percentage of gross receipts, and small enterprises are charged a flat fee. It too has been criticized. Mantell (1979) and the General Accounting Office (1980) proposed that the franchise fee structure established under the Concessions Policy Act (1965) should be revised. Their major criticisms are that the set fee charged appears to have little justification, and that charge rates bear little relationship to the values of the privileges granted. The General Accounting Office is also of the opinion that fees should be set more in accord with the economic structures of individual enterprises. It notes that criteria will need to be established which will, "take account of economic factors such as acceptable rates of return on gross sales and investment, and on the relative importance of gross sales, net profit and returns on investment as these may warrant a longer or higher franchise fee being charged", (General Accounting Office, 1980).

Clearly, a range of alternative approaches to the determination of fees are available to New Zealand administrators. The existing system can either be modified, or it can be replaced by other systems. If it is to be retained, useful revisions could include greater flexibility in the flat annual fees and percentages of gross receipts charged. If it is to be replaced in recreational sectors, alternatives include:

- levying larger operations a flat annual fee also;
- levying a percentage of net annual receipts;
- applying a set charge on a per client basis; and,
- calculating a fee on the basis of the land site value.

In evaluating alternative methods of determining fees, each method could be rated according to the following criterion:
- general equity in application;
- extent to which it is economically realistic in regard to the different economic structures of enterprises;
- ability to be easily verified by administrative agencies; and,
- correlation with both costs incurred and licensing benefits acquired.

Setting appropriate licence fees, therefore, is a very difficult undertaking. However, the inherent difficulties involved do in no way justify the ongoing arbitrary designation of licence fees as some form of extra tax.

Implications

(i) Clear rationalization of the objectives inherent in levying fees.

(ii) Differentiation of recreative sectors to a much greater extent to ensure fees are applied more equitably. This would involve identification of:
- any public costs incurred;
- the financial value of obtaining licensing privileges; and,
- the economic structure of the different types of enterprises involved.

9.2.5 Issue Five: Conflicts Over Recreative Facilities

Uses of the South Island mountain lands by both private and commercial recreationists is increasing. In recreative activities requiring facilities such as huts, tracks and wharves, increasing use is resulting in growing conflict between the private and commercial recreational sectors. Increasingly, administrators are faced with the following issue: What is the appropriate approach in alleviating these conflicts?

In examining this issue outlined, greatest attention will be paid to the problem of use and provision of huts. This particular problem is both
Public administrators usually stipulate that private operators may use public huts, provided this is not to the detriment of the 'general public'. However, by adopting this stance those administrators are failing to accept that private sector clients also are members of the general public and as such, there exists little rationale for automatically regulating them to 'second class' status.

This ideal of equal rights of access, however, results in decision making being made much more complex when overcrowding problems occur as the simple solution of banning commercial users is no longer appropriate. Instead administrative agencies have two main options:

- restrict recreational use generally (eg by the implementation of a booking system); or
- provide more facilities.

If the facility development option is accepted, administrative agencies have three choices of action:

- public provision of extra huts for use by both recreative sectors;
- public provision of extra huts to be used by concessionaires; and,
- private provision of huts by concessionaires for their own use.

Each of these options incurs both benefits and costs for the administrative agencies involved. Private provision of huts, for example, is of benefit in that private sector finance is invested in the development, and maintenance of hut facilities is more directly the concessionaires' responsibility. Less effective administrative control of the facility is the main cost associated. A reversal of benefits and costs stem from public provision of facilities.
In the United States of America, problems stemming from less effective administrative control of privately owned facilities have resulted in the Comptroller General recommending that in national park areas, "Government should finance future construction of park service concession facilities" (General Accounting Office, 1982).

This option may also be preferable in the New Zealand mountain land areas that require more sensitive administration.

Implications

(i) The ceasing of administrative discrimination against the 'general public' employing commercially provided services on the basis of private sector involvement. Instead, assessment of all recreational activities - commercial and non-commercial - should be according to their 'appropriateness' for the particular land area concerned.
CHAPTER TEN
CONCLUSION

The commercial recreational industry emerges from this study as both a significant and growing user of the mountain lands. In conjunction with other recreational servicing sectors it is responsible for attracting thousands of overseas and domestic recreationists to the mountain lands each year. The requirements of recreationists employing its services differ greatly and thus the commercial recreational industry is characterized by extreme diversity in both scale and range of composite enterprises. Services currently offered by this fragmented, but interdependent industry vary in type from the passive to the highly active, and from the mass market to the very specialized.

In offering these services the industry utilizes the mountain land resource in conjunction with other land uses, both recreative and non-recreative. Commercial recreative activities consequently are affected by, and in turn affect, both other overlapping land uses and the mountain land environment itself. The most important effects stemming from the industry include:

- the accruing of substantial foreign exchange earnings to the New Zealand economy;
- stimulation of the domestic economy and provision of increased employment opportunities, particularly at the regional level;
- fulfilment of recreational requirements and promotion of mountain lands as a recreative resource; and,
- the potential generation of conflicts and negative impacts for private recreationists, other users of mountain lands and mountain lands per se.
Most enterprises within the industry cater for the more rapidly expanding domestic and overseas recreational market segments. Thus the generation of such beneficial and negative effects can be expected to increase in both scale and complexity. Administrative guidance and regulation therefore will become increasingly important in ensuring the potential benefits stemming from the industry are maximized with minimum production of social and environmental costs.

Current administration of the industry emerges from this study as being overly fragmented, unnecessarily complex and reactive in character. In part, the current situation reflects division of administration responsibilities for the industry both between land administering agencies and a wide range of other national and local level agencies with more specific responsibilities in related management areas. It also reflects the inherent difficulty of developing an administrative framework around an industry characterized by considerable diversity, fragmentation and expansion.

Together these characteristics result in equitable and effective 'long term orientated' administration being a very difficult task. This task is made more challenging by the small scale of many of the diverse sectors requiring administrative attention. It is thus difficult for agencies to cater adequately for the diversity within the industry while at the same time expending only the level of administrative resources warranted. With newly emergent recreational sectors it is also extremely difficult for administrative agencies to balance the prospective operator's need for 'room to manoeuvre' against the potential risk of unacceptable environmental and social effects being generated. Therefore, despite existing administrative arrangements being clearly less than optimal, it is worthy of note that no major deleterious consequences have been attributed to the industry to date.
Principle sources of dissatisfaction with present administration identified in this study are these: First, and probably foremost, there is a lack of co-ordination of policy and practice amongst the many administrative agencies involved. Specifically, there is insufficient co-ordination and co-operation between:
- agencies involved in administering, financing and marketing the industry;
- administrative agencies and the commercial recreational industry itself; and,
- administrative agencies per se.

The fragmentation of administrative responsibilities which currently exists is resulting in some commercial recreational sectors appearing to be overly regulated and in others operating without any formalized administration at all. Administrative fragmentation is also a source of delay (and thus frustration) at the licensing stage due to the number of agencies whose approvals often have to be sought.

In part at least, administrative delay at the licensing stage is a product of the apparent reactive nature of present administration. In many instances decisions on submitted proposals are delayed, (sometimes for years) while administrative agencies formulate their respective policy stances and licensing procedures.

This form of delay shows a lack of appreciation for the very real financial constraints within which private sector enterprises must operate.

Another administrative shortcoming identified by the study is the lack of influence by both local level administrative agencies and the industry itself in the administrative process. A more direct influence by local level administration in the formulation of licensing details is needed,
due to the marked effects of the enterprises at a local level. Greater involvement of the industry in an advisory role is important to ensure that the diversity and specialization of the industry are accounted for to a much greater degree than at present.

Lack of adequate administrative appreciation of the diversity within the industry is readily apparent from the study. It is shown by both the generalized appraisal of some licensing aspects irrespective of either the commercial recreational sector, or land tenure involved, and the total disregard of particular types of commercial recreational sectors in policy statements.

The study also indicates that only certain aspects need to be considered as general policy. With the exception of environmental protection, client safety and impacts on other user groups, other aspects are more appropriately regarded on a flexible basis. For example administrative involvement in establishment and subsequent monitoring of pricing standards only appears warranted when either operators are unable to compete freely in the market place, or when market place regulation is incompatible with policy objectives for the land tenure in question. With respect to development capital and recreational demand, assessment appears needed in all land tenures in two situations - when either permanent modifications to the environment are proposed, or recreational sites are to be 'locked up' by the proposed enterprise.

National park areas emerge as a special case in that this land designation is governed by much more stringent policy objectives. Hence, in fulfilling recreational demands in national park areas both the scale and nature of that demand and the means of meeting it require more detailed administrative assessment. In such areas limited establishment of commercial recreational
enterprises is favoured. The resultant protection of existing concessionaires is, however, another aspect of current administrative practice which requires more flexible application. This principally reflects the diversity in types of commercial recreational enterprises and thus in impacts generated.

It is also apparent that existing administration inadequately accounts for the differing financial structures and security requirements of dissimilar commercial operations. For example, the very generalized and inflexible manner in which licence fees are levied appears inequitable. The current system does in no way account for the differences in financial structure of the enterprises, let alone for any public costs incurred or privileges gained from the acquisition of a licence. Insufficient regard for the differing security requirements of enterprises is shown by the 'ad hoc' manner in which the length of licence tenure periods are set. Thus in establishing guidelines for both the levying of fees and length of licence tenure greater administrative understanding of the diverse characteristics and impacts of different sectors within the industry is necessary.

Finally, the apparent administrative differentiation in treatment of commercial and private recreationists on the basis of private sector involvement appears unwarranted, as both groups are legitimate mountain land users. Instead, the long term appropriateness of particular recreational uses and magnitude of recreational use in mountain land areas appear to warrant much greater attention.

Taken together, the apparent problems with existing administrative policy and practice outlined above suggest that optimal administration of the industry will require change. Future administration of the industry would benefit by being more co-ordinated, more specifically related to the individual commercial recreational service sectors and much more anticipatory in outlook.
At the time of writing a number of administrative policies relevant to commercial recreation are in the process of either initial formulation or review. It seems appropriate, therefore, to conclude this study by briefly presenting a series of guidelines against which developing policy statements might be regarded.

Guideline One: Complementarity

The proposed policy statement should not contradict or overlap existing policies generated by associated agencies with responsibility in the commercial recreational industry. This includes those policies established both within the same administrative level and at differing levels - national, regional and district. In particular, complementarity needs to be carefully assessed both in regard to policies designated by land administering authorities with responsibilities in adjoining land areas, and when land and transport administrative authorities responsibilities are likely to overlap.

Guideline Two: Comprehensiveness

All type of commercial recreational sectors within the respective authorities' spheres of influence should be accounted for to a degree commensurate with their scale and potential effects.

Guideline Three: Appropriateness of Administrative Level

Many aspects of administration are not suited to assessment at the national level due to the high degree of diversity and specialization within the industry. Thus national level responsibilities should be expressed more in terms of broad principles. Local level agencies should have designated responsibilities which relate more specifically to the commercial recreational ventures within their respective areas of jurisdiction.
Guideline Four: Attention to Key Aspects

Irrespective of either land tenure, or the commercial recreational sector involved, three aspects of commercial ventures require consideration in all policy statements. These are environmental protection, safety standards - including operator experience - and potential impacts on other user groups.

Guideline Five: Inclusion of Licence Fee and Length of Tenure

Stipulations

Guidelines for levying fees and setting licence tenure generally are both appropriate matters for inclusion in policy directives. Such guidelines must however be flexible in application and directly related to the particular circumstances and characteristics of individual ventures.

Guideline Six: Avoidance of Unnecessary Regulation

Many other aspects of commercial recreational ventures can be left appropriately to regulation by market forces. Therefore, aspects such as quality and pricing standards, capital availability and market demand only require administration in specific circumstances and not as a matter of general policy. The need for flexible regulation in regard to such aspects reflects the diversity in type and in impacts of commercial enterprises.

Guideline Seven: Forward-Looking

Finally and perhaps most importantly, the policy statement must be in harmony with the long term goals for New Zealand's mountain lands. Specifically, both the commercial recreational industry's inherent potential for growth and the increasing demands upon mountain lands by other recreative and non-recreative sectors require recognition, irrespective of the policy statement involved.
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APPENDICES
APPENDIX 1

CASE STUDY RESPONDENTS

1.1 COMMERCIAL RECREATIONAL ENTERPRISES AND ADMINISTRATIVE AGENCIES REPRESENTED IN INTERVIEWS

1.1.1 Commercial Recreational Enterprises

Air Safaris and Services (NZ) Ltd
Alpine Guides (Mt Cook) Ltd
Alpine Recreation Canterbury
Alpine Adventure (Lake Tekapo)
Benmore Charter Service
Glentanner Park (Mt Cook) Ltd
  - High Country Charters
  - Horse Treks
Heliski Ltd/Whirlwide Ltd
Lake Ohau Ski Field Ltd
Lilybank (Trophy Guide Services) Ltd
MacKenzie Country Safaris
Mt Cook Lines
New Zealand Fly Fishing
Omarama Safari Tours
South Canterbury Fishing Safaris
Tekapo Horse Rides
Tekapo Ski Field Ltd
Tramper Service
1.1.2 Administrative/Advisory Agencies

Department of Lands and Survey
- Christchurch District Office
- Timaru District Office
- Mt Cook National Park
- Aorangi National Parks and Reserves Authority

New Zealand Forest Service
- Christchurch Conservancy Office
- Geraldine Conservancy Office

Ministry of Works and Development

Waitaki Catchment Commission and Regional Water Board

MacKenzie County Council

1.2 OTHER AGENCIES CONTRIBUTED

1.2.1 Agency

Ministry of Transport

Tourist Hotel Corporation of New Zealand

Tourist and Publicity Department

Department of Lands and Survey
- Wellington Head Office
- Dunedin District Office
- Mt Aspiring National Park
- Queenstown Reserves

New Zealand Forest Service
- Wellington Head Office

MacKenzie Branch - Federated Farmers

Australia and New Zealand Travel Ltd

Centre for Resource Management
APPENDIX 2

INTERVIEW SCHEDULE

Introductory Comments: I would like to talk with you about the commercial recreational industry. I am interested in gaining a better understanding of this industry's characteristics, particularly administrative.

Although I am interested in the whole of the South Island mountain lands, research is focused directly on use of the Upper Waitaki area. Consequently all questions are concerned with the Upper Waitaki area only.

When I talk about the commercial recreational industry, I am referring to operations such as - commercial ski fields, safari hunting, guided walks and scenic flights. Accommodation, associated facilities and transportation services are subsequently outside the bounds of the study.
PART A

COMMERCIAL and NON-COMMERCIAL

RECREATIONAL TRENDS

(Administrators and Operators Perspectives)

1. What are the major recreational trends in the Upper Waitaki, both commercial and non-commercial? (prompts: overall numbers; percentage domestic/overseas; nationality of overseas recreationists; grouping (e.g. family, friends); age groups; mode of travel; form of trip (e.g. organised, independent); type of accommodation).

2. Are there any particular comments you would like to make regarding any of these trends?
1. I would like to obtain some information and judgements from you about various aspects of your operation.

(i) Outline of activities provided?
   (prompts: type; scale; location; weather dependency; length of services; seasonality; public facilities used; recent changes)

(ii) Description of users?
   (prompts: number; age groups; nationality; groupings; travel mode; accommodation)

(iii) Ownership and institutional agreements involved?
   (prompts: form of ownership; number of employees; land tenure; licences/permits required; length of tenure/ licences)

(iv) Dealing with other administrative agencies/operators?
   (prompts: formal/informal agreements other operator; dealings with district, regional, national agencies)

(v) Future trends?
   (prompts: market trends; administrative changes; expansion of services (range, scale)
1. I would like to obtain some information from you about the commercial recreational services with which you are familiar.

(i) Operation descriptions?

(prompts: characteristics (e.g. location, ownership, activities provided, years in operation, tenure, licences, permits, scale, number of employees, user numbers, user characteristics, seasonality, recent and proposed changes)

(ii) What are your judgements about the appropriateness of the services?

(prompts: for the area; user requirements)

(iii) What dealings does the agency you represent have with the operations?

(prompts: institutional agreements (i.e. land tenure, licences, agreements, permits); informal dealings)

2. With regard to commercial recreation generally, what dealings does the agency you represent have with other agencies?

(prompts: district; regional; national)
PART C  

COSTS AND BENEFITS  

(Operators Perspective)  

1. What are the benefits association with your operation?  
   (prompts: employment; infrastructure development)  

2. What are the negative effects of your operation?  
   (prompts: environmental effects; public access; conflicts with other recreationists/non-recreationists)  

(Administrators Perspective)  

1. What are the benefits of the commercial recreational industry?  
   (prompts: employment; infrastructure)  

2. What are the negative effects of the industry?  
   (prompts: environmental effects; public access; conflicts with other recreationists/non-recreationists)
1. How satisfied have you been with the licensing and administrative procedures that have operated in the past? (prompts: best points; problems)

2. Do you think licensing is necessary in the recreational industry, and if so why?

3. What recommendations would you make for future administrative policies and licensing? (prompts: length of tenure; rights of renewal; safety standards; licence fees; acceptance criteria (e.g. availability of finance, effects on existing operators, public demand); operator experience; quality standards; level of licensing detail; monitoring responsibilities; use of public facilities; public versus private provision of facilities)
## APPENDIX 3 - COMMERCIAL RECREATIONAL ENTERPRISES IN THE SOUTH ISLAND MOUNTAIN LANDS

### SKIING (SKI FIELDS)

<table>
<thead>
<tr>
<th>Activity</th>
<th>Name of Service</th>
<th>Operator</th>
<th>Nearest Centre</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Skiing (Ski field)</td>
<td>Rainbow Valley</td>
<td>Rainbow Ski Field Developments Ltd</td>
<td>Blenheim</td>
<td>Rainbow Valley - Private Company</td>
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<tr>
<td></td>
<td></td>
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<td></td>
<td>- Recreational Licence (NZFS)</td>
</tr>
<tr>
<td>Skiing (Ski field)</td>
<td>Porter Heights</td>
<td>Porter Heights Development Ltd</td>
<td>Springfield</td>
<td>Craigieburn Range - Public Company</td>
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<td>- Recreational Licence (Dept L&amp;S)</td>
</tr>
<tr>
<td>Skiing (Ski field)</td>
<td>Mt Hutt</td>
<td>Mt Hutt Ski &amp; Alpine Tourist Co Ltd</td>
<td>Methven</td>
<td>Mt Hutt - Public Company</td>
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<tr>
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<td></td>
<td></td>
<td></td>
<td>- Recreational Licence (NZFS) - Heli-skiing offered</td>
</tr>
<tr>
<td>Skiing (Ski field)</td>
<td>Erewhon</td>
<td>Erewhon Park Ltd</td>
<td>Mt Somers</td>
<td>Two Thumbs Range - Private Company</td>
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<td></td>
<td></td>
<td>- Recreational Licence (Dept L&amp;S)</td>
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<tr>
<td>Skiing (Ski field)</td>
<td>Mt Dobson</td>
<td>Mt Dobson Ski Field Ltd</td>
<td>Fairlie</td>
<td>Ben McLeod Range - Private Company</td>
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<td>- Special lease (Dept L&amp;S)</td>
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<tr>
<td>*Skiing (Ski field)</td>
<td>Tekapo</td>
<td>Tekapo Ski Field Ltd</td>
<td>Tekapo</td>
<td>Two Thumbs Range - Private Company</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>- Special lease (Dept L&amp;S) - Heli and Fixed-wing Skiing offered</td>
</tr>
<tr>
<td>*Skiing (Ski field)</td>
<td>Lake Ohau</td>
<td>Lake Ohau Ski Field Ltd</td>
<td>Omarama</td>
<td>Barrier Range - Public Company</td>
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<td>- Recreational Licence (Dept L&amp;S)</td>
</tr>
<tr>
<td>Skiing (Ski field)</td>
<td>Cadrona</td>
<td>Cadrona Ski Field Ltd</td>
<td>Wanaka</td>
<td>Harris Mountains - Public Company</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>- Special lease (Dept L&amp;S) - Heli-skiing available</td>
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<tr>
<td>Skiing (Ski field)</td>
<td>Coronet Peak</td>
<td>Mt Cook Group Ltd</td>
<td>Queenstown</td>
<td>Coronet Peak - Public Company</td>
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<td>- Recreational Licence (Dept L&amp;S)</td>
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<td></td>
<td></td>
<td>- Heli-skiing, Cresta-run slide available</td>
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<td></td>
<td></td>
<td>- Field open year round for scenic tours</td>
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# SKIING (NON-SKI FIELDS)

<table>
<thead>
<tr>
<th>Activity</th>
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<th>Operator</th>
<th>Nearest Centre</th>
<th>Location of Activities</th>
<th>Comments</th>
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</thead>
</table>
| *Alpine and Nordic Skiing       | Alpine and Alpine Recreation | Alpine Recreation Canterbury | Christchurch based | Mid-Canterbury Southern Alps | - Private Company  
- Recreational Licences (Dept L&S and NZFS) |
| *Alpine and Nordic Skiing       | Alpine Ski Alpine Guides (Mt Cook) Ltd | Alpine Guides (Mt Cook) Ltd | Mt Cook | Mt Cook National Park | - Private Company  
- Recreational Licence (Dept L&S) |
| Alpine Heli-skiing              | Helicopter Skiing | Ski Guides (NZ) Ltd | Wanaka | Harris Mountains | - Private Company  
- Recreational Licence (Dept L&S) |
| Alpine and Glacier Skiing       | Alpine Ski Alpine Guides (Westland) Ltd | Alpine Guides (Westland) Ltd | Fox Glacier | Fox and Franz Josef Glaciers (Westland National Park) | - Private Company  
- Recreational Licence (Dept L&S) |
| *Glacier Skiing                | Ski Tasman Alpine Guides (Mt Cook) Ltd and Mt Cook Lines | Alpine Guides (Mt Cook) Ltd and Mt Cook Lines | Mt Cook | Tasman Glacier (Mt Cook National Park) | - Unofficial Association of Mt Cook Lines, (Public Company) and Alpine Guides (Mt Cook) Ltd, (Private Company)  
- Recreational Licence (Dept L&S) |
| *Ski Touring                    | Adventure Skiing | Alpine Adventure (Lake Tekapo) | Tekapo | Two Thumbs Range | - 4-wheel Drive/Fixed Wing Access Optional  
- Associated with Air Safaris and Services (NZ) Ltd |
| *Heli-skiing                    | Heli Ski        | Heliski Ltd | Mt Cook | Ben Ohau Range | - Private Company  
- Operated in association with Alpine Guides (Mt Cook) Ltd  
- Recreational Licence (Dept L&S) |
| Ski Touring                     | Ski Mountaineering | Mountain Recreation | Wanaka | Mt Aspiring and Fiordland National Parks | - Recreational Licence (Dept L&S)  
- Private Company |
| Heli-skiing                     | Heli-Skiing     | Doug Hood Ltd | Methven | Mt Hutt area | - Private Company  
- Recreational Licence (NZFS) |
| Heli-skiing                     | Heli-Skiing     | Whirlwide Heli-Skiing Helicopter Ltd | Queenstown | Remarkables area | - Private Company  
- Recreational Licence (NZFS) |
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<th>HIGH MOUNTAIN GUIDING/CLIMBING SCHOOLS</th>
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<td>School</td>
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<td>High Mountain Guiding</td>
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<td>School</td>
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<th>VALLEY GUIDING/GUIDED WALKS</th>
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<tr>
<td>Activity</td>
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</tbody>
</table>
| *Launch trip | Benmore Charter Service | A. Walsh | Omarama | Lake Benmore | - Owner/Operator  
- Fishing offered |
| Launch trip | Wanaka Lake Services | Miller Brothers | Wanaka | Lake Wanaka | - Private Company  
- Fishing offered |
| Launch trip/ Farm visits | Lake Excursions | Fiordland Travel Ltd | Te Anau Queenstown Milford | Lakes Te Anau and Manapouri, Milford and Doubtful Sounds | - Private Company  
- Mt Nicholas Station, Milford Park Farm Ltd, Fiordland Waipiti Park Ltd, Walter Peak Station visits associated  
- Recreational Licence (Dept L&S) |
| Launch trip | Scenic Cruises | Fiordland Cruises Ltd | Manapouri | Dusky and Doubtful Sounds | - Owner/Operator  
- Recreational Licence (Dept L&S)  
- Sea fishing, live deer capture offered |
<p>| Launch trip | Red Ride Cruises | Tourist Hotel Corporation of New Zealand | Milford | Milford Sound | - New Zealand Government owned |
| Launch trip | - | Takitimu Tours | Te Anau | Lake Te Anau | - Owner/Operator |
| Launch trip | - | Simon Vogel | Te Anau | Lake Te Anau | - Owner/Operator |
| Launch trip | - | H.G. Thompson | Te Anau | Lake Te Anau | - Owner/Operator |
| Launch trip | - | V.J. McKay | Te Anau | Lakes Hauroko and Monowai | - Owner/Operator |
| Hydrofoil trip | - | - | Queenstown | Lake Wakatipu and surroundings | - Owner/Operator |</p>
<table>
<thead>
<tr>
<th>Activity</th>
<th>Name of Service</th>
<th>Operator</th>
<th>Nearest Centre</th>
<th>Location of Activities</th>
<th>Comments</th>
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<tbody>
<tr>
<td>Rafting</td>
<td>Raft Tour</td>
<td>Alpine River Tours Ltd</td>
<td>Christchurch</td>
<td>Waimakariri River</td>
<td>- Private Company</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>- Jet Boat associated</td>
</tr>
<tr>
<td>Rafting</td>
<td>Rafting</td>
<td>Alpine Safaris Ltd</td>
<td>Christchurch</td>
<td>Hurunui, Clarence and Rakaia Rivers</td>
<td>- Private Company</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>- Jetboating, Canoeing associated</td>
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<td>*Rafting</td>
<td>Tasman River Rafts</td>
<td>Alpine Guides (Mt Cook) Ltd</td>
<td>Mt Cook</td>
<td>Tasman River (Mt Cook National Park)</td>
<td>- Private Company</td>
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<td></td>
<td></td>
<td>- Recreational Licence (Dept L&amp;S)</td>
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<tr>
<td>Rafting</td>
<td>West Coast Rafts, Heli-Rafts</td>
<td>P. Bruce</td>
<td>Franz Josef</td>
<td>Waiho River</td>
<td>- Owner/Operator</td>
</tr>
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<td></td>
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<td></td>
<td>- Heli-Raft option, Mt Cook Lines associated</td>
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<tr>
<td>Rafting</td>
<td>White Water Rafts, Kon Tiki Rafts</td>
<td>Value Tours Queenstown Ltd</td>
<td>Queenstown</td>
<td>Shotover, Kawarau and Landsborough Rivers</td>
<td>- Private Company</td>
</tr>
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<td></td>
<td></td>
<td></td>
<td>- Jetboat/raft option</td>
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<tr>
<td>Rafting</td>
<td>Danes Back Country Experiences</td>
<td>Danes Back Country</td>
<td>Queenstown</td>
<td>Hunter, Shotover, Landsborough, Dart, Kawarau, Matukituki, Waitoto Rivers</td>
<td>- Private Company</td>
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<td>- Hiking, fishing, 4-wheel drive, scenic flights associated</td>
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<tr>
<td>Rafting</td>
<td>Raft Trips</td>
<td>Rapid Travel Ltd</td>
<td>Te Anau</td>
<td>Waiau River (Fiordland National Park)</td>
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<td></td>
<td>- Jetboat associated</td>
</tr>
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<td>Rafting</td>
<td>Raft Cruising</td>
<td>Wanaka Tourist Craft Ltd</td>
<td>Wanaka</td>
<td>Clutha River</td>
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<tr>
<td>Jet Boating</td>
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<td></td>
<td></td>
<td>Lakes Rotoiti and Rotoroa (Nelson Lakes National Park)</td>
<td>- Owner/Operator</td>
</tr>
<tr>
<td>Jet Boating</td>
<td></td>
<td>Hammer Jet Boat Tours Ltd</td>
<td>Murchison</td>
<td>Waiau River</td>
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<td>Jet Boat Tours</td>
<td>Alpine River Tours Ltd</td>
<td>Hammer Springs</td>
<td>Waimakarari River</td>
<td>- Owner/Operator, Fishing offered</td>
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<td>Jet Boating</td>
<td>Jet Services</td>
<td>Windwhistle Motors Ltd</td>
<td>Windwhistle</td>
<td>Rakaia River</td>
<td>- Owner/Operator, Fishing offered</td>
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<td>Jet Boating</td>
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<td>Haast Pass Tourist Services Ltd</td>
<td>Makaora</td>
<td>Wilkins River (Mt Aspiring National Park)</td>
<td>- Owner/Operator, Associated with Southern Alps Air Charter Ltd - Recreational Licence (Dept L&amp;S)</td>
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<td>Jet Boating</td>
<td>Shotover River</td>
<td>Shotover Gorge Jet Boats Ltd</td>
<td>Queenstown</td>
<td>Shotover River</td>
<td>- Private Company</td>
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<td>Jet Boating</td>
<td>Goldstream Jet Service</td>
<td>Goldstream Jet</td>
<td>Queenstown</td>
<td>Kawarau River</td>
<td>- Owner/Operator</td>
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<td>Twin River Jet</td>
<td>Twin River Jet</td>
<td>Queenstown</td>
<td>Shotover and Kawarau River</td>
<td>- Private Company</td>
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<tr>
<td>Jet Boat Hire</td>
<td>U-Drive Jet Boats</td>
<td>Marine Enterprises Ltd</td>
<td>Queenstown</td>
<td>Lake Wakatipu</td>
<td>- Private Company</td>
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<td>Kawarau Jet Service</td>
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<td>Kawarau River</td>
<td>- Owner/Operator</td>
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<td>Alpine Jet</td>
<td>Alpine Jets Ltd</td>
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<td>Kawarau River and Lake Wakatipu</td>
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<td>Makaora River Tours Ltd</td>
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<td>Rakaia Gorge Jet Boat Safaris Ltd</td>
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<td>U-Drive Boats</td>
<td>Wanaka Lake Services</td>
<td>Wanaka</td>
<td>Lake Wanaka</td>
<td>- Private Company - Canoes, rowboats available</td>
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<td>Jet Boating/ Helicopter ride</td>
<td>Helijet</td>
<td>Helijet Adventures Ltd</td>
<td>Queenstown</td>
<td>Kawarau River</td>
<td>- Private Company - Alpine Helicopters Ltd associated</td>
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<td>Jet Boating</td>
<td>Lower Shotover Jet Boating</td>
<td>Lower Shotover Jet Boat</td>
<td>Queenstown</td>
<td>Kawarau and Shotover Rivers</td>
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<td>Jet Boat Hire</td>
<td>Jet Boat Hire</td>
<td>Invercargill Boat Hire</td>
<td>Invercargill based</td>
<td>Lower South Island Lakes, Rivers</td>
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<td>Jet Boating, Jet Boat Hire</td>
<td>Scenic and Fishing Trips, Water Taxi, General Hire</td>
<td>Rapid Travel Ltd</td>
<td>Te Anau</td>
<td>Te Anau area and Fiordland National Park</td>
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**CANOEING/KAYAKING**

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<td>Kayak Safari</td>
<td>Over Alp Alpine Excursions</td>
<td>Christchurch based</td>
<td>Rakaia/Ashburton Rivers</td>
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<td>Kayaking</td>
<td>Kayak Clinic</td>
<td>Danes Back Country</td>
<td>Queenstown</td>
<td>Lake Wakatipu, Shotover and Kawarau Rivers</td>
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<td>*Kayaking</td>
<td>Kayak Adventure</td>
<td>Alpine Adventure (Lake Tekapo)</td>
<td>Tekapo</td>
<td>Lake Tekapo</td>
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<td>Canoe Safaris</td>
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<td>Queenstown</td>
<td>Kawarau River</td>
<td>- Owner/Operator</td>
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| Helicopter   | Helitours       | Whirlwide Helicopters Ltd | Mt Cook        | MacKenzie Basic         | - Private Company  
| Flights      |                  |                         |                |                          | - Helipad - Glentanner Park  
|              |                  |                         |                |                          | - Fishing Charters offered         |
| Helicopter   | Helitours       | Alpine Helicopters Ltd  | Queenstown     | Queenstown,  
| Flights      | Helijet         |                         |                | Wanaka, Te Anau areas    | - Private Company  
|              |                  |                         |                |                          | - Helipad - Queenstown Airport  
|              |                  |                         |                |                          | - Jet Boating, Fishing Charters associated |
| Helicopter   | Helicopter      | Mt Cook Group Ltd       | Franz Josef    | Westland National Park  | - Public Company  
| Flights      | Excursions,     |                         | Glacier        |                          | - Helipad - Franz Josef  
|              | Heli-Hike       |                         |                |                          | - T.H.C. associated in Heli-Hike         |
| Helicopter   | Helicopter      | Glacier Helicopters Ltd | Fox Galcier    | Westland area            | - Private Company  
| Flights      | Flights         |                         |                |                          |                                |
| *Aeroplane   | Air Safaris     | Air Safaris and Services (NZ Ltd) | Tekapo | Mt Cook and Westland National Parks and Southern Lakes and Sounds area | - Private Company  
| Flights      |                  |                         |                |                          | - Recreational Licence (Dept L&S)  
|              |                  |                         |                |                          | - Operates from Glentanner Park and Tekapo Air strips |
| *Aeroplane   | Float Plane     | Mt Cook Group Ltd       | Mt Cook, Te Anau, Milford, Queenstown, Franz and Fox Glaciers | Fiordland, Westland, Mt Cook National Parks, and Southern Lakes area | - Public Company  
| Flights      | and Ski Plane   |                         |                |                          | - Recreational Licence (Dept L&S)  
|              | Adventures,     |                         |                |                          | - Large scale operation  
|              | Flight-seeing   |                         |                |                          | - Some airstrips within National Parks |
| Aeroplane    | Alpine Flights  | Alpine Scenic Flights Ltd | Christchurch based | The Glaciers, Southern Lakes and Sounds area | - Private Company  
| Flights      |                  |                         |                |                          | - Associated with Air Charter Christchurch Ltd |
| Aeroplane    | Fiordland Air   | Fiordland Aero Club (Inc) | Te Anau        | Fiordland National Park, Te Anau area |                                |
| Flights      | Services        |                         |                |                          |                                |
### SCENIC FLIGHTS contd

<table>
<thead>
<tr>
<th>Activity</th>
<th>Name of Service</th>
<th>Operator</th>
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<tr>
<td>Aeroplane Flights</td>
<td>Scenic Flights</td>
<td>Nelson Aero Club</td>
<td>Nelson</td>
<td>Inland Nelson area</td>
<td>- Private Company</td>
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<tr>
<td>Air Travel Ltd</td>
<td>Scenic Flights</td>
<td>Southern Alps Air Charter Ltd</td>
<td>Makaora</td>
<td>Mt Aspiring National Park and surroundings</td>
<td>- Associated with Haast Pass Tourist Services Ltd - Private Company - Ski landings offered</td>
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<td>Air Charter Ltd</td>
<td>Scenic Flights</td>
<td>Air Travel Ltd</td>
<td>Hokitika based</td>
<td>Central Southern Alps area</td>
<td>- Private Company</td>
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<tr>
<td>Hollyford Air Travel Ltd</td>
<td>Scenic Flights</td>
<td>Te Anau</td>
<td>Fiordland National Park</td>
<td>- Private Company - Associated with Hollyford Tourist and Travel Co Ltd.</td>
<td></td>
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<tr>
<td>Hollyford Air Travel Ltd</td>
<td>Scenic Flights</td>
<td>Rainbow Balloons</td>
<td>Arrowtown</td>
<td>Wakatipu Basin</td>
<td>- Owner/Operator</td>
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### HORSE RIDING

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<thead>
<tr>
<th>Horse Riding</th>
<th>Horse Treks</th>
<th>Hamner Springs Trekking Centre Ltd</th>
<th>Hamner Springs</th>
<th>Hamner Springs area</th>
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<tbody>
<tr>
<td>Horse Riding</td>
<td>Horse Riding and Treks</td>
<td>W. Berryman</td>
<td>Mt Cook</td>
<td>Glentanner Station</td>
<td>- Owner/Operator - Associated Glentanner Park (Mt Cook) Ltd</td>
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<tr>
<td>Horse Riding</td>
<td>-</td>
<td>Gin and Raspberry Stables</td>
<td>Wanaka</td>
<td>Cadrona Valley</td>
<td>- Owner/Operator</td>
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<tr>
<td>Horse Riding</td>
<td>Trial Rides</td>
<td>Moonlight Stables Ltd</td>
<td>Queenstown</td>
<td>Moonlight Valley and Moke Creek</td>
<td>- Private Company</td>
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<tr>
<td>HORSE RIDING contd</td>
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<tr>
<td><strong>Activity</strong></td>
<td><strong>Name of Service</strong></td>
<td><strong>Operator</strong></td>
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<td><strong>Comments</strong></td>
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<tr>
<td>Horse Riding</td>
<td>-</td>
<td>Hunters Horse Excursions</td>
<td>Arrowtown</td>
<td>Arrow River</td>
<td>Owner/Operator - Alpine Helicopter Ltd associated with one trip</td>
</tr>
<tr>
<td>Horse Riding</td>
<td>-</td>
<td>Hillandale Stables</td>
<td>Queenstown</td>
<td>-</td>
<td>-</td>
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<tr>
<td>Horse Riding</td>
<td>-</td>
<td>Erewhon Park Ltd</td>
<td>Mt Somers</td>
<td>Erewhon Station</td>
<td>Owner/Operator</td>
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<tr>
<td>Horse Treks</td>
<td>Horse Treks</td>
<td>G. Simpson</td>
<td>Tekapo</td>
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<table>
<thead>
<tr>
<th>FOUR-WHEEL DRIVING/TRAIL BIKE RIDING</th>
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<tbody>
<tr>
<td>4-Wheel Driving</td>
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<td>4-Wheel Driving</td>
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<td>4-Wheel Driving</td>
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<td>4-Wheel Driving</td>
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<tr>
<td>*Trail Bike Riding *</td>
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## Farm Tours/Wild Life Observation

<table>
<thead>
<tr>
<th>Activity</th>
<th>Name of Service</th>
<th>Operator</th>
<th>Nearest Centre</th>
<th>Location of Activities</th>
<th>Comments</th>
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</thead>
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<tr>
<td>Deer Observation</td>
<td>Deer Park Safaris</td>
<td>Deer Park Heights</td>
<td>Queenstown</td>
<td>Frankton Peninsula</td>
<td>- Value Tours (Queenstown) Ltd associated</td>
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<tr>
<td>Waipiti Observation</td>
<td>Deer Farm Tours</td>
<td>Te Anau</td>
<td>Fiordland Waipiti Park Ltd</td>
<td>- Fiordland Travel Ltd associated</td>
<td></td>
</tr>
<tr>
<td>Farming Tours</td>
<td>Milford Park Farm Ltd</td>
<td>Te Anau</td>
<td>-</td>
<td>- Fiordland Travel Ltd associated</td>
<td></td>
</tr>
<tr>
<td>Farming Tours</td>
<td>Cecil Peak Tours</td>
<td>Alexander Dawson Inc</td>
<td>Queenstown</td>
<td>Cecil Peak Station, Lake Wakatipu</td>
<td>- Company Overseas Owned (USA) - Launch tours, Fishing, Walks, 4-Wheel Driving associated</td>
</tr>
<tr>
<td>Farming Tours</td>
<td>Walter Peak Tours</td>
<td>Walter Peak Tours Ltd</td>
<td>Queenstown</td>
<td>Walter Peak Station, Lake Wakatipu</td>
<td>- Private Company - Launch trips, Guided fishing offered - Reid Developments Ltd associated</td>
</tr>
<tr>
<td>*Farming Tours</td>
<td>High Country Tours</td>
<td>High Country Tours Ltd</td>
<td>Mt Cook</td>
<td>Glentanner Station</td>
<td>- Owner/Operator - Associated Glentanner Park (Mt Cook) Ltd</td>
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## Guided Hunting/Guided Fishing

<table>
<thead>
<tr>
<th>Hunting</th>
<th>Lilybank Safari Lodge</th>
<th>Lilybank Trophy Guide Services Ltd</th>
<th>Tekapo</th>
<th>Lilybank Station</th>
<th>- Recreational Licence (Dept L&amp;S) - Private Company - Hunting behind enclosure - Fishing provided</th>
</tr>
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<tbody>
<tr>
<td>Hunting</td>
<td>The Homestead Lodge</td>
<td>Wildlife Enterprises Ltd</td>
<td>Methven</td>
<td>Mt Hutt Station</td>
<td>- Recreational Licence (Dept L&amp;S) - Private Company - Hunting behind enclosure - Helicopter, jetboating, horse riding associated</td>
</tr>
<tr>
<td>*Hunting</td>
<td>Kehu Guides</td>
<td>Nelson</td>
<td>Nelson/ Marlborough</td>
<td>- Owner/Operator</td>
<td></td>
</tr>
<tr>
<td>Hunting/Fishing</td>
<td>Skyline Travel (Nelson) Ltd</td>
<td>Nelson</td>
<td>Nelson/ Marlborough</td>
<td>- Owner/Operator</td>
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<tr>
<td>Hunting/Fishing</td>
<td>Punga Lodge</td>
<td>Franz Josef</td>
<td>Franz Josef area</td>
<td>- Owner/Operator - Launch Trips associated</td>
<td></td>
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<tr>
<td>Activity</td>
<td>Name of Service</td>
<td>Operator</td>
<td>Nearest Centre</td>
<td>Location of Activities</td>
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<td>Rakaia River Park</td>
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<td>Nelson River Guides</td>
<td>Nelson</td>
<td>Nelson area</td>
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<tr>
<td>Fishing</td>
<td>A.B.C. Tours</td>
<td>A.B.C. Tours Ltd</td>
<td>Christchurch</td>
<td>Canterbury</td>
<td>Associated International Limousine Association</td>
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<td>Fishing</td>
<td></td>
<td>Fishing Tours Alpine River Tours Ltd</td>
<td>Christchurch</td>
<td>- Private Company - Jet boat used</td>
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<tr>
<td>*Fishing</td>
<td>Fishing Safaris</td>
<td>South Canterbury Fishing Safaris</td>
<td>Geraldine Lake Benmore/Rangitata River</td>
<td>Owner/Operator - Jet boat used</td>
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<tr>
<td>*Fishing</td>
<td>Fishing Safaris</td>
<td>MacKenzie Country Safaris</td>
<td>Fairlie MacKenzie Basin</td>
<td>Owner/Operator - 4-Wheel Drive used - Hunting offered</td>
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<tr>
<td>*Fishing</td>
<td>Fishing Safaris</td>
<td>B. Thornton</td>
<td>Twizel MacKenzie Basin</td>
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<td>Fishing</td>
<td></td>
<td>B. Mclay</td>
<td>Dunedin Omarama area</td>
<td>Owner/Operator</td>
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<tr>
<td>Fishing</td>
<td></td>
<td>A. Gray</td>
<td>Wanaka Wanaka area</td>
<td>4-Wheel Drive used Owner/Operator</td>
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<tr>
<td>Fishing</td>
<td></td>
<td>B. Collie</td>
<td>Wanaka Wanaka area</td>
<td>4-Wheel Drive used Owner/Operator</td>
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<tr>
<td>Fishing</td>
<td></td>
<td>P. Cullen</td>
<td>- Southern Lakes</td>
<td>Owner/Operator - Launch used</td>
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<tr>
<td>Fishing</td>
<td></td>
<td>L. Wilson</td>
<td>Wanaka Wanaka area</td>
<td>Owner/Operator - 4-Wheel Drive used</td>
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<tr>
<td>Fishing</td>
<td></td>
<td>P. Miller</td>
<td>Wanaka Wanaka area</td>
<td>Owner/Operator - Associated Wanaka Lake Services</td>
<td></td>
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<tr>
<td>Fishing</td>
<td></td>
<td>Cedar Safaris</td>
<td>Cromwell Queenstown/ Mt Aspiring National Park</td>
<td>Owner/Operator - Recreational Licence (Dept L&amp;S) - Aeroplane, Jet boat, 4-Wheel Drive used</td>
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</tr>
<tr>
<td>Activity</td>
<td>Name of Service</td>
<td>Operator</td>
<td>Nearest Centre</td>
<td>Location of Activities</td>
<td>Comments</td>
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</tr>
</tbody>
</table>
| Fishing  | Moke Lake      | Guthrie and Wallace Enterprises Ltd | Queenstown | Moke Lake              | - Private Company  
- Gold Panning included |
| Fishing  | -              | Trout Safaris | Queenstown | Queenstown area         | - Owner/Operator  
- 4-Wheel Drive used |
| Fishing  | -              | Alpine Fishing Charters | Queenstown | Queenstown area         | - Owner/Operator  
- Jet boat used |
| Fishing  | -              | R. Moss | Queenstown | Queenstown area         | - Owner/Operator  
- Launch used |
| Fishing  | -              | R. Car | Queenstown | Queenstown area         | - Owner/Operator  
- Launch used |
| Fishing  | -              | Southland Safaris | Te Anau | Te Anau area           | - Owner/Operator  
- Helicopter/Float Plane/4-Wheel Drive used |
| Fishing  | -              | B. Speden | Te Anau | Te Anau area           | - Owner/Operator  
- 4-Wheel Drive used |
| Fishing  | -              | Southern Lakes Guide Service | Te Anau | Te Anau area           | - Owner/Operator  
- Launch/4-Wheel Drive used |
| Fishing  | -              | Hollyford Tours and Travel Co Ltd | Te Anau | Fiordland National Park | - Private Company  
- Recreational Licence (Dept L&S)  
- Jet boat/Launch/Aeroplane used |
| Fishing  | -              | Borland Safaris | Te Anau | Fiordland National Park | - Owner/Operator |

(*Commercial recreation services located in the Upper Waitaki case study area.*)
APPENDIX 4

OUTLINE OF COMMERCIAL RECREATIONAL SECTORS

(1) SKIING (SKI FIELDS)

Number/Description

Ten commercial ski fields operate in the South Island and they are all major enterprises requiring fixed facilities and large land area.

Scale

Ski field scale is apparent from the considerable investment involved, (e.g. the new chairlift at Mt Hutt cost $1.1 million and initial development at the proposed Rastusburn field is estimated at $7 million), (Press, 26 May, 1982). Capacity of the fields is on a corresponding scale, ranging from 400 skiers per day at Rainbow Valley, to 3000 per day at Mt Hutt, (Press, 26 May, 1982).

Development

Skiing has "burgeoned" in popularity in recent years, (Aukerman and Davison, 1980) and in the last decade seven commercial ski fields have opened. Both these and the three earlier established fields currently are substantially expanding services and facilities.

Location

Ski fields are located in high montane basins above 1500 metres.

Land Tenure

Tenure includes pastoral lease, unalienated crown land, recreational reserve and state forest.
Licences

Eight fields are administered under either a recreational licence or special lease agreement with the Department of Lands and Survey. Mt Hutt and Rainbow Valley have recreational licences with the New Zealand Forest Service.

Ownership

Ownership ranges from large public companies, to small private companies. This is demonstrated by Coronet Peak and Tekapo Ski Fields which are owned by a large public company with 3000 plus shareholders and a private company of 2 shareholders respectively.

Facilities

Access roads, buildings and tow equipment are needed by all fields.

Impacts

The access road can cause negative visual effects and significant erosion problems. An example is the bad scarring produced by the Ohau access road. Pre-season landscaping and sewage disposal are also potential sources of environmental damage.

The skiing enterprises also produce significant socio-economic impacts due to the large numbers of recreationists they attract and the many casual staff employed in the winter season. Methven, for example, has experienced phenomenal growth in transportation, accommodation and recreational services since the development of the Mt Hutt Ski Field, (Henderson, 1976).

Considerable foreign exchange is generated by skiing enterprises too.
(ii) SKIING (NON-SKI FIELDS)

Number/Description

Nine companies provide guided alpine, nordic and glacier skiing. Most services require either ski plane or helicopter access and there is close association between the guiding and transport services.

Scale

Heli-skiing and glacier skiing have become substantial operations. An example is the 2000 people approximately which participated in off-field skiing activities in the Mt Cook region last year. Nordic skiing is currently on a much smaller scale.

Development

There is currently very rapid expansion in all services.

Location

Skiing enterprises are mainly based around the larger tourist centres.

Land Tenure

Areas used include national parks, state forests, unoccupied crown land and pastoral lease land.

Licences

Most activities are licensed by either the Department of Lands and Survey or the New Zealand Forest Service.

Ownership

Many formal and informal ties exist between the range of services involved. Examples include: one operator hiring the services of another on a contract basis; unofficial associations of the transportation and guiding sectors;
and, formal relationships within a company structure. Most of the companies involved in skiing operations are privately owned and relatively small. This is with the exception of Mt Cook Group Ltd, a large public company that provides helicopter and ski plane access in the Mt Cook and Westland areas.

Facilities
Set heli-pad and landing strip bases are needed for the air services and they are usually located at existing airfields and ski fields. Hut accommodation is also required for the over-night skiing enterprises.

Impacts
Noise pollution is the main environmental effect associated with both glacier and heli-skiing. All the enterprises earn foreign exchange and some provide valuable 'off-season' work for guides and pilots involved during the summer months in mountain guiding and scenic flight operations.

(iii) HIGH MOUNTAIN GUIDING/CLIMBING SCHOOLS

Number/Description
High mountain guiding services and climbing schools are offered by four commercial operations mainly in the summer months. During the winter months operators are all involved in skiing ventures.

Scale
Enterprises differ greatly in size. The largest operation is Alpine Guides (Mt Cook) Ltd and it guided approximately 250 clients during the 1981/82 summer season.

Development
Guided climbing was first offered at Mt Cook in the 1880's and client numbers
have fluctuated greatly since this time. All of the current operations have been established within the last twenty years and presently these are experiencing a gradual increase in bookings.

**Location**

Guided climbing activities are located in the high mountain areas of the mid Southern Alps. The three larger operations are each based in a national park: Mt Cook; Westland; and, Mt Aspiring.

**Land Tenure**

Areas used include national parks and unalienated crown land.

**Licences**

All enterprises have licences with the Department of Lands and Survey.

**Ownership**

Small private companies control all operations.

**Facilities**

Most services require hut accommodation. Alpine Guides (Mt Cook) Ltd. also needs staff housing and an operational base in Mt Cook National Park. Staff housing requirements are contributing to conflicts over the limited space available in the Mt Cook Village zone.

**Impacts**

Potential exists for conflicts with other hut users over space. Positive effects include: local guiding employment; foreign exchange earnings; and, improved mountain safety due to the ready availability of qualified guides and instruction courses.
(iv) VALLEY GUIDING/GUIDED WALKS

Number/Description

Twelve operators provide guided trekking and walking services in the South Island mountain lands. Trips range from wilderness tramps and alpine traverses, to short guided walks on the glaciers.

Scale

Enterprises range from the very small scale, (i.e. a few groups guided annually), to other involving large numbers. An example of a large scale operation is the 3500 people approximated that were guided on the Milford Track during the 1979/80 summer season, (Fiordland National Park statistics, 1980).

Development

Guided treks on the Milford Track and glacier walking were the first established operations and they began in the early 1900's. Participation in guided services has increased rapidly since this date, particularly during the last decade. Many current guiding operations are very recently established and there are a considerable number still in the throes of setting up. This is demonstrated by the eight guiding applications accepted for the Arthurs Pass National Park in 1982.

Location

The earliest operations were all based in national parks - Fiordland, Westland and Mt Cook. More recent operations are scattered throughout the mountain lands.

Land Tenure

Guided treks are located in national parks, state forest parks, state forests, unalienated crown land and reserve areas.
Licences

All guided trekking services have licences with either the Department of Lands and Survey or the New Zealand Forest Service.

Ownership

Ownership of the trekking enterprises corresponds closely with the marked difference in scale. Individual owner-operators usually run the very small enterprises and the large guiding operations are under public company control. The one exception is the Milford Track walk operated by the Tourist Hotel Corporation of New Zealand.

Facilities

The larger scheduled guiding operations need overnight hut accommodation and on the Milford, Routeburn and Hollyford tracks private huts are supplied for guided walkers. Other overnight guiding operations use either public huts, or carry their own tents. Launch, jet boat and air access are also required with some trips.

Impacts

Commercial guiding ventures provide: temporary employment for guides and hut wardens over the summer months; earn valuable overseas revenue; and, enable a much wider range of people to experience off-road areas, especially family groups and older people, (Aukerman and Davison, 1980).

Potential negative impacts include track damage and conflicts over hut space between guided and 'freedom walkers' when public huts are used.
LAUNCH TRIPS/HYDROFOIL TRIPS

Number/Description

Eleven launch cruise enterprises provide a diverse range of services. The large enterprises offer scheduled services all year and the smaller enterprises offer trips on a seasonal, demand basis. Launch cruise enterprises are often associated with farm visits, deer park visits, fishing and trekking activities.

One hydrofoil service is currently also in operation and it offers sightseeing trips around the Queenstown area.

Scale

The operations differ greatly in scale and passenger numbers range from a few hundred per year to many thousands. A large operation, Fiordland Travel Ltd carried approximately 135,000 people in the Fiordland National Park during the 1979/80 season, (Fiordland National Park statistics, 1980).

Development

The first launch enterprise began approximately seventy years ago and since this time there has been both a gradual increase in the number of launch trip operations and a large expansion in the scale of a few enterprises.

Location

Most launch operations and the hydrofoil service are located in the Fiordland National Park and Queenstown areas.

Land Tenure

The lake and fiord locations are administered directly by the Crown.
Licences

All passenger carrying launches are licensed by the Ministry of Transport and those launch services which operate in the national parks have additional recreational licences with the Department of Lands and Survey.

Ownership

The smaller scale enterprises are run as owner-operator type ventures and many of the larger operations are owned by private companies. This is with the exception of Cecil Peak Tours and Red Ride Cruises, which are owned by a large American company, Alexander Dawson Inc. and the Tourist and Hotel Corporation of New Zealand respectively.

Facilities

Wharf facilities are needed and some of the large scale operations also require buildings – booking offices and staff housing. In the Milford area these requirements have resulted in increased congestion in the facilities area and conflict with the commercial fishing industry over wharf space.

Impacts

Considerable employment and overseas exchange are generated by launch and hydrofoil enterprises. They also offer a valuable sightseeing service for many recreationists and a means of access to lake shore areas not serviced by road.

(vi) RAFTING

Number/Description

Eight companies provide rafting activities in the South Island. Jet boating, scenic flights, fishing and four-wheel drive services are offered with some trips.
Scale
Rafting enterprises range in size from small, part time operations, to larger scale operations offering a comprehensive range of scheduled services.

Development
Rafting operations have been set up since the 1970's.

Location
The two larger scale operations are based at Queenstown and both these and other operations use a very wide range of rivers throughout the South Island.

Land Tenure
The river locations are directly under Crown control.

Licences
Rafting operations are only licensed in national park areas.

Ownership
Small scale private companies own the rafting ventures.

Facilities
Vehicle access is needed to the waters edge.

Impacts
River bed damage is a potential environmental effect with some operations due to access requirements. Small scale local employment and overseas revenue are also generated by rafting enterprises.
(vii) JET BOATING

Number/Description

There are approximately twenty commercial jet boating enterprises operating in the South Island mountain lands. Jet boat services offered include - scenic trips, water taxi, fishing charters and general hire. In some instances jet boat tours are associated with bus, raft and helicopter trips.

Scale

Most jet boat enterprises are small scale. This is apart from Queenstown operations which usually have at least two boats and run scheduled services.

Development

Most operations have been set up since the mid 1970's.

Location

Approximately two-thirds of the 'scenic trip' services are based on the Kawarau and Shotover rivers. The remaining jet boat services are at scattered river and lake locations throughout the South Island.

Land Tenure

River and land locations are under direct Crown ownership.

Licences

Licences are only required in national park areas.

Ownership

Jet boat enterprises are run by either small private companies or as owner-operator type arrangements.
Facilities

Vehicle access to the waters edge is needed and landing wharves are required in some cases.

Impacts

The motor noise and water turbulence generated by jet boat services is a source of potential conflict with other recreative users. Potential also exists for damage to access and landing sites. Positive effects include - the earning of overseas dollars, the availability of water access for recreationists generally and employment opportunities.

(viii) KAYAKING/CANOEING

Number/Description

Four operators offer canoe and kayak, guided safaris and instruction courses. Canoes also are offered for hire by several other commercial enterprises.

Scale

The operations are currently run on a very small scale.

Development

All services have been established in the last five years.

Location

The two main enterprises are based at Queenstown and the other two operations are located in the mid Southern Alps area.

Land Tenure

The river and lake locations are directly under Crown control.
Licences
Canoe and kayak operations are not licensed.

Ownership
Services are run mainly on an owner-operator basis.

Facilities
Vehicle access is needed to the lakes and rivers.

Impacts
All impacts are very minimal due to the current small scale of these enterprises. Potential environmental effects include damage from vehicle access.

(ix) SCENIC FLIGHTS

Number/Description
Approximately nine companies and clubs run scenic aeroplane flights. One of these companies, plus three additional companies, offer helicopter sight seeing. A commercial hot air ballooning service also has been recently established.

Many air operations are associated with other commercial recreational activities - skiing, jet boating ... etc., and the provision of services for non-recreational sectors.

Scale
Air operations range from small companies and aero clubs offering scenic services on a part time basis, to the large scale operation of Mt Cook Group Ltd. It provides a comprehensive range of access and scenic flight services from many air strips.
Development
Most scenic flight services began operating in the later 1960's to 1970's period. The hot air balloon operation has been developed much more recently in February, 1983.

Location
Scenic flight enterprises operate from a wide range of locations scattered throughout the South Island mountain lands.

Land Tenure
Most services are based in national park areas, although adjoining areas held under a wide range of tenures usually are flown over also.

Licences
The Department of Lands and Survey has licences with those services landing in national parks, pastoral leasehold area and unalienated crown land. All operators also have licences with the Ministry of Transport.

Ownership
With the exception of Mt Cook Group Ltd and the aero clubs, ownership of these enterprises is by private company.

Facilities
All of the fixed-wing and helicopter operations need set landing strips and heli-pads respectively. When these bases are established in national park areas the associated large land requirements have been a source of conflict with other land users, (e.g. Milford).

Impacts
Noise pollution is a significant negative impact of large scale motorized
air services. It is a particular annoyance for recreationists seeking 'wilderness' experiences in nearby areas. At the same time air operations enable thousands of people to experience the mountain lands resource without any damage being done to the physical environment. Considerable employment and overseas funds are also generated and they are a very valuable component of mountain land rescue work.

(x) HORSE RIDING

Number/Description

Eight operators currently provide guided horse treks on either a scheduled or seasonal demand basis.

Scale

Horse riding services range from very small operations, to those taking out at least fifty people daily.

Development

The services have all been established within the last twenty years.

Location

Most are located near to the tourist centres.

Land Tenure

Freehold, leasehold and reserve designated land areas are used.

Licences

Most operations are not licensed.

Ownership

Individual owner-operators and small private companies own these enterprises.
Facilities

Holding paddocks, stables and associated facilities are needed.

Impacts

Current impacts are minimal due to enterprise size. Potential exists, however for track damage and conflicts with other recreationists using the same areas.

(xi) FOUR-WHEEL DRIVING/TRAIL BIKE RIDING

Number/Description

Seven commercial operators offer four-wheel drive trips. Trips offered last for several hours to a few days and activities such as gold panning, farm tours, walking, fishing and hunting often are associated. Trail bike riding is available also from one operation.

Scale

The operations are all small scale.

Development

The services have been established within the last ten years.

Location

Trips locations are scattered throughout the mountain lands.

Land Tenure

Pastoral lease areas, state forest parks and river valleys directly under Crown control are utilized.

Licences

All operations have licences with the Ministry of Transport and a few hold
licences with the land administering bodies.

Ownership
Ownership is by small private company and owner-operator arrangements.

Facilities
Vehicle tracks are needed for the four-wheel drive operations.

Impacts
Current impacts are minimal due to the small size of operations. Considerable potential for environmental damage does exist, however particularly if the vehicles travel off existing tracks.

(xi) FARM TOURS/WILD ANIMAL OBSERVATION

Number/Description
There are currently two deer park enterprises and several high country runs offering farm tours in the mountain lands. Most of the farm tour services are provided in conjunction with other activities – guided fishing, horse riding, ... etc.

Scale
These enterprises usually cater for large numbers of visitors. An example is the 90,000 people which visited Walter Peak Station in the 1975/76 season, (Geddes, 1977).

Development
The first operation was developed in the 1960's and there has been a gradual expansion in the number and scale of such services since.
Location
All enterprises are located adjacent to major tourist centres.

Land Tenure
Both freehold and leasehold areas are involved in these services.

Licences
All operations are licensed with the Department of Lands and Survey.

Ownership
With the exception of Cecil Peak Station which is foreign owned, all other enterprises are under private company control. In most cases the tourist and farming operations are run separately. This is demonstrated by the situation at Walter Peak Station, as it's farming and tourist activities are controlled by Walter Peak Farm Ltd and Walter Peak Tours Ltd respectively.

Facilities
Building facilities are required and when launch access is associated, wharves are needed also.

Impacts
The operations both earn overseas funds and generate much greater employment than equivalent undiversified farming operations. In 1982, Cecil Peak Station employed twenty staff due to it's tourist involvement, (Tourist and Publicity Department, 1982).

At the same time these types of developments potentially do endanger the 'rights' of public access to high country runs which recreationists have traditionally enjoyed.
GUIDED FISHING/GUIDED HUNTING

Number/Description
Two pastoral leases offer guaranteed trophy hunting on their own properties and several other operators offer free-range hunting on a casual basis. Guided fishing services are provided by over thirty operators scattered throughout the mountain lands area. Trips by - helicopter, aeroplane, four-wheel drive, jet boat, horse and launch - are associated with some services.

Scale
The two guaranteed hunting operations require considerable investment in lodge establishment, enclosure fencing and game stocking. Alternative guiding enterprises are much more small scale and services are usually provided on a part time, demand basis. All services are used by very small numbers of recreationists.

Development
Guided fishing and hunting services have been available for many years. Hunting guides are gradually decreasing in number due to the corresponding decline in game animals available.

Location
The guided activities are offered at very scattered locations.

Land Tenure
Water bodies used for guided fishing are directly Crown owned and areas covered by hunting activities include: state forest; national park; unoccupied crown land; and, pastoral leasehold.
Licences
Most hunting operations are licensed by either the Department of Lands and Survey or the New Zealand Forest Service. The few exceptions tend to be small scale and transient. The guided fishing operations usually do not hold licences with the land administering authorities.

Ownership
The large scale enterprises are owned by private companies and the smaller operations are controlled on an owner-operator basis.

Facilities
Some services need overnight accommodation.

Impacts
Guided fishing and hunting operations both earn overseas funds and generate employment. At the same time these enterprises are directly competing with non-guided recreationists for the wildlife resources.
APPENDIX 5
## Appendix 5 - Commercial Recreational Administration
### Primary Administrative Role

#### (i) National Level

<table>
<thead>
<tr>
<th>Agency</th>
<th>Statutory Authority</th>
<th>Policy Statements Referred to in Text</th>
</tr>
</thead>
<tbody>
<tr>
<td>National Water and Soil Conservation</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>Organization</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Air Services Licensing Authority</td>
<td>Air Services Licensing Act, 1951</td>
<td>Domestic Air Services Policy of New Zealand, 1982</td>
</tr>
<tr>
<td>Ministry of Agriculture and Fisheries</td>
<td>Fisheries Act, 1908, Animal Act, 1967, Animals Protection Act, 1960</td>
<td></td>
</tr>
<tr>
<td>Department of Internal Affairs, (Wildlife Division)</td>
<td>Wildlife Act, 1953</td>
<td></td>
</tr>
<tr>
<td>Agency</td>
<td>Statutory Authority</td>
<td>Policy Statements Referred to in Text</td>
</tr>
<tr>
<td>--------------------------------------------</td>
<td>-------------------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------</td>
</tr>
</tbody>
</table>
**APPENDIX 6 - COMMERCIAL RECREATIONAL ADMINISTRATION**

**SUPPLEMENTARY ADVISORY/ADMINISTRATIVE ROLE**

<table>
<thead>
<tr>
<th>(i) NATIONAL LEVEL</th>
<th>(ii) REGIONAL and DISTRICT LEVEL (UPPER WAITAKI AREA)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tourist and Publicity Department</td>
<td>Aorangi National Parks and Reserves Authority</td>
</tr>
<tr>
<td>Ministry of Works and Development</td>
<td>Waitaki Joint Committee</td>
</tr>
<tr>
<td>Commission for the Environment</td>
<td>Waitaki Valley Acclimatisation Society</td>
</tr>
<tr>
<td>Tourist and Hotel Corporation of New Zealand</td>
<td>Waitaki Lakes Committee</td>
</tr>
<tr>
<td>Walkways Commission</td>
<td>South Canterbury Regional Development Council</td>
</tr>
<tr>
<td>Queen Elizabeth II Trust</td>
<td>- Plus District Branches of some National Level Agencies</td>
</tr>
<tr>
<td>New Zealand Council for Recreation and Sport</td>
<td></td>
</tr>
<tr>
<td>New Zealand Acclimatisation Societies</td>
<td></td>
</tr>
<tr>
<td>Tourist Advisory Council</td>
<td></td>
</tr>
<tr>
<td>New Zealand National Travel Association Incorporated</td>
<td></td>
</tr>
<tr>
<td>Nature Conservation Council</td>
<td></td>
</tr>
<tr>
<td>Royal Forest and Bird Protection Society of New Zealand</td>
<td></td>
</tr>
<tr>
<td>Federated Farmers of New Zealand Incorporated</td>
<td></td>
</tr>
<tr>
<td>Federated Mountain Clubs of New Zealand Incorporated</td>
<td></td>
</tr>
<tr>
<td>New Zealand Mountain Safety Council</td>
<td></td>
</tr>
<tr>
<td>New Zealand Professional Rafting Association</td>
<td></td>
</tr>
<tr>
<td>New Zealand Professional Mountain Guides Association</td>
<td></td>
</tr>
<tr>
<td>New Zealand Professional Fishing Guides Association</td>
<td></td>
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<tr>
<td>New Zealand Commercial Launch Operators</td>
<td></td>
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<tr>
<td>New Zealand Ski Association</td>
<td></td>
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<tr>
<td>New Zealand Four-Wheel Drive Association</td>
<td></td>
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<tr>
<td>New Zealand Deer Stalkers Association</td>
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<tr>
<td>New Zealand Jet Boat Association</td>
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<tr>
<td>New Zealand Canoes Association</td>
<td></td>
</tr>
<tr>
<td>New Zealand Alpine Clubs</td>
<td></td>
</tr>
<tr>
<td>New Zealand Big Game Hunters Association Incorporated</td>
<td></td>
</tr>
</tbody>
</table>
## APPENDIX 7 - CHARACTERISTICS OF COMMERCIAL RECREATIONAL ENTERPRISES IN THE UPPER WAITAKI AREA

<table>
<thead>
<tr>
<th>Name of Operation</th>
<th>Services Provided</th>
<th>Central Location</th>
<th>Location of Services</th>
<th>Years in Operation</th>
<th>Months Operational</th>
<th>Weather Dependency</th>
<th>Service Length</th>
<th>Investment Required</th>
<th>Public Facilities Used</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alpine Adventure</td>
<td>kayaking</td>
<td>Tekapo</td>
<td>Lakes Tekapo, McGregor and Alexandrina</td>
<td>1 year</td>
<td>summer</td>
<td>high</td>
<td>few hours to five days</td>
<td>low</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Two Thumb Range</td>
<td></td>
<td>winter</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Alpine Recreation</td>
<td>guided tramping</td>
<td>Christchurch</td>
<td>Liebig Range Hopkins and Landsborough Valleys</td>
<td>1 year</td>
<td>summer</td>
<td>medium</td>
<td>5 to 7 days</td>
<td>huts</td>
<td></td>
</tr>
<tr>
<td>Canterbury</td>
<td></td>
<td></td>
<td>Two Thumb Range</td>
<td></td>
<td>winter</td>
<td>high</td>
<td>5 to 6 days</td>
<td>medium to low</td>
<td></td>
</tr>
<tr>
<td>Tramper Service</td>
<td>guided tramping</td>
<td>Twizel</td>
<td>Hopkins and Landsborough Valleys</td>
<td>2 years</td>
<td>summer</td>
<td>medium</td>
<td>1 to 6 days</td>
<td>low</td>
<td></td>
</tr>
<tr>
<td>Alpine Guides</td>
<td>rafting</td>
<td>Mt Cook</td>
<td>Mt Cook National Park</td>
<td>3 years</td>
<td>summer</td>
<td>medium</td>
<td>3 to 4 hours</td>
<td>-</td>
<td></td>
</tr>
<tr>
<td>(Mt Cook) Ltd</td>
<td>mountain-eering</td>
<td></td>
<td>National Park</td>
<td>16 years</td>
<td>summer</td>
<td>mainly</td>
<td>1 to 2 weeks</td>
<td>medium to low</td>
<td></td>
</tr>
<tr>
<td></td>
<td>school</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>huts</td>
<td></td>
</tr>
<tr>
<td></td>
<td>private guiding</td>
<td></td>
<td></td>
<td>19 years</td>
<td>all year</td>
<td></td>
<td>1 day to several weeks</td>
<td></td>
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<tr>
<td></td>
<td>alpine and</td>
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<td></td>
<td>3 days to 2 weeks</td>
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<tr>
<td></td>
<td>nordic skiing</td>
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<tr>
<td></td>
<td>touring</td>
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</tr>
<tr>
<td>Alpine Guides</td>
<td>glacier skiing</td>
<td>Mt Cook</td>
<td>Mt Cook National Park</td>
<td>26 years</td>
<td>July to November</td>
<td>high</td>
<td>1 day</td>
<td>high</td>
<td></td>
</tr>
<tr>
<td>(Mt Cook) Ltd and</td>
<td></td>
<td></td>
<td>(park staff used as first guides)</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>-</td>
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</tr>
<tr>
<td>Mt Cook Group Ltd</td>
<td></td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Name of Operation</td>
<td>Services Provided</td>
<td>Central Base</td>
<td>Location of Services</td>
<td>Years in Operation</td>
<td>Months Operational</td>
<td>Weather Dependency</td>
<td>Service Length</td>
<td>Investment Required</td>
<td>Public Facilities Used</td>
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</tr>
<tr>
<td>Mt Cook Group Ltd</td>
<td>scenic flights</td>
<td>Mt Cook (Glentanner)</td>
<td>Mt Cook National Park</td>
<td>26 years (began ski plane adventure)</td>
<td>all year</td>
<td>high</td>
<td>30 minutes to 1 hour</td>
<td>high</td>
<td>-</td>
</tr>
<tr>
<td>Air Safaris and Services (NZ) Ltd</td>
<td>scenic flights</td>
<td>Tekapo Glentanner</td>
<td>Mt Cook and Westland National Park</td>
<td>7 years (scenic flights offered)</td>
<td>all year</td>
<td>high</td>
<td>45 minutes approximately</td>
<td>high</td>
<td>-</td>
</tr>
<tr>
<td>Whirlwide Ltd</td>
<td>scenic flights (helicopter)</td>
<td>Tekapo Glentanner</td>
<td>Ben Ohau Range MacKenzie Basin</td>
<td>9 years (scenic flights offered)</td>
<td>all year</td>
<td>high</td>
<td>30 minutes to several hours</td>
<td>high</td>
<td>-</td>
</tr>
<tr>
<td>Heliski Ltd and Alpine Guides (Mt Cook) Ltd</td>
<td>heli-skiing</td>
<td>Glentanner</td>
<td>Ben Ohau and Two Thumb Ranges</td>
<td>7 years (services offered)</td>
<td>winter</td>
<td>high</td>
<td>1 day to 1 day</td>
<td>high</td>
<td>-</td>
</tr>
<tr>
<td>Glentanner Park (Mt Cook) Ltd</td>
<td>4-wheel drive/farm tours guided fishing horse treks trail bikes</td>
<td>Glentanner</td>
<td>Glentanner Station (Ben Ohau Range)</td>
<td>2 years (services offered)</td>
<td>summer</td>
<td>low</td>
<td>several hours</td>
<td>medium to low</td>
<td>-</td>
</tr>
<tr>
<td></td>
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<tr>
<td>Lilybank Trophy Guide Services Ltd</td>
<td>safari hunting guided fishing</td>
<td>Lilybank Station</td>
<td>Lilybank Station</td>
<td>12 years (first established) 2 years (reopened)</td>
<td>March to September summer</td>
<td>medium</td>
<td>1 day to 1 week</td>
<td>high</td>
<td>-</td>
</tr>
<tr>
<td>Name of Operation</td>
<td>Services Provided</td>
<td>Central Base</td>
<td>Location of Services</td>
<td>Years in Operation</td>
<td>Months Operational</td>
<td>Weather Dependency</td>
<td>Service Length</td>
<td>Investment Required</td>
<td>Public Facilities Used</td>
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</tr>
<tr>
<td>Lake Ohau Ski Field Ltd</td>
<td>skiing</td>
<td>Ohau</td>
<td>Barrier Range</td>
<td>4 years (company) 31 years (ski field)</td>
<td>July to October</td>
<td>high</td>
<td>1 day</td>
<td>high</td>
<td>-</td>
</tr>
<tr>
<td>Tekapo Ski Field Ltd</td>
<td>skiing</td>
<td>Richmond Station</td>
<td>Two Thumb Range</td>
<td>25 years (ski field)</td>
<td>July to October</td>
<td>high</td>
<td>1 day</td>
<td>high</td>
<td>-</td>
</tr>
<tr>
<td>Omarama Safari Tours</td>
<td>4-wheel drive tours guided fishing</td>
<td>Omarama</td>
<td>Clay Cliffs area local rivers (Omarama)</td>
<td>1 year</td>
<td>summer</td>
<td>medium (river crossing)</td>
<td>several hours</td>
<td>medium to low</td>
<td>-</td>
</tr>
<tr>
<td>Benmore Charter Services</td>
<td>launch cruise guided fishing</td>
<td>Oamaru</td>
<td>Lake Benmore</td>
<td>2 years</td>
<td>summer</td>
<td>high</td>
<td>several hours to overnight</td>
<td>medium to low</td>
<td>-</td>
</tr>
<tr>
<td>MacKenzie Country Safaris</td>
<td>guided fishing</td>
<td>Fairlie</td>
<td>Lakes and Rivers in Upper Waitaki</td>
<td>3 years</td>
<td>October to April</td>
<td>high</td>
<td>½ day to 1 day</td>
<td>low</td>
<td>-</td>
</tr>
<tr>
<td>Fishing Guide B. Thornton</td>
<td>guided fishing</td>
<td>Twizel</td>
<td>Lakes and Rivers in Upper Waitaki</td>
<td>2 years</td>
<td>October to April</td>
<td>high</td>
<td>1 day</td>
<td>low</td>
<td>-</td>
</tr>
<tr>
<td>South Canterbury Fishing Safaris</td>
<td>guided fishing</td>
<td>Geraldine</td>
<td>Lakes and Rivers in Upper Waitaki</td>
<td>2 years</td>
<td>October to April</td>
<td>high</td>
<td>½ day to 1 day</td>
<td>low</td>
<td>-</td>
</tr>
<tr>
<td>Horse Treks G. Simpson</td>
<td>horse treks</td>
<td>Tekapo</td>
<td>adjoining leasehold areas (Tekapo)</td>
<td>1 year</td>
<td>summer holidays</td>
<td>medium</td>
<td>few hours</td>
<td>medium to low</td>
<td>-</td>
</tr>
<tr>
<td>Name of Operation</td>
<td>Services Provided</td>
<td>Number of users (1982)</td>
<td>Nationality</td>
<td>Age/Sex Profiles</td>
<td>Trip Form</td>
<td>Travel Mode</td>
<td>Accommodation</td>
<td>Growth Rates</td>
<td></td>
</tr>
<tr>
<td>-------------------</td>
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<td>--------------</td>
<td></td>
</tr>
<tr>
<td>Alpine Adventure</td>
<td>Kayaking</td>
<td>very small numbers</td>
<td>mostly overseas majority Australians</td>
<td>late teens to thirties, high percentage female</td>
<td>independent travellers</td>
<td>car/public coach</td>
<td>YHA mainly also motor camp to hotel</td>
<td>increasing demand, especially North Americans, less Australians</td>
<td></td>
</tr>
<tr>
<td>Alpine Recreation</td>
<td>Guided tramping</td>
<td>700 person/days (includes services provided outside of area)</td>
<td>66% overseas mostly Australians</td>
<td>wide range of age groups</td>
<td>independent travellers</td>
<td>(usually met at Christchurch Airport)</td>
<td>YHA to hotel</td>
<td>steady increase</td>
<td></td>
</tr>
<tr>
<td>Cantebury</td>
<td>Nordic skiing</td>
<td>50% overseas mostly Australians</td>
<td>20 to 60 years</td>
<td></td>
<td></td>
<td></td>
<td>rapid increase</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Tramper Service</td>
<td>Guided tramping</td>
<td>very small numbers</td>
<td>New Zealanders</td>
<td>18 to 45 years</td>
<td>independent travellers</td>
<td>car/public coach</td>
<td>-</td>
<td>increasing</td>
<td></td>
</tr>
<tr>
<td>Alpine Guides</td>
<td>Rafting</td>
<td>-</td>
<td>50% overseas</td>
<td>wide range 20 to 60 years</td>
<td>most on organised tours</td>
<td></td>
<td>80% hotel</td>
<td>gradual increase, more independent travellers</td>
<td></td>
</tr>
<tr>
<td>(Mt Cook) Ltd</td>
<td>Mountain-eering</td>
<td>80 people</td>
<td>40% Australians 10% other overseas</td>
<td>20 to 30 years mainly men</td>
<td>independent travellers</td>
<td>car/public coach</td>
<td>hotel/motel/ Unwin hut</td>
<td>gradual increase</td>
<td></td>
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<tr>
<td></td>
<td>School</td>
<td></td>
<td>40% Australians 25% other overseas</td>
<td>20 to 50 years mainly men</td>
<td></td>
<td></td>
<td>recent decrease</td>
<td></td>
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<tr>
<td></td>
<td>Guiding</td>
<td>150 people</td>
<td>60% overseas</td>
<td>20 to 50 years</td>
<td></td>
<td></td>
<td>numbers increasing</td>
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<td></td>
<td>Alpine and Nordic</td>
<td>small numbers</td>
<td>60% overseas</td>
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<td></td>
<td>Ski touring</td>
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<tr>
<td>Alpine Guides</td>
<td>Glacier skiing</td>
<td>1300 people</td>
<td>60% overseas</td>
<td>30 to 40 years main group</td>
<td>organised tours/independent travellers</td>
<td>all travel modes</td>
<td>hotel/motel/ Unwin hut</td>
<td>very rapid increase</td>
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<tr>
<td>(Mt Cook) Ltd and</td>
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<tr>
<td>Mt Cook Group Ltd</td>
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<tr>
<td>Name of Operation</td>
<td>Services Provided</td>
<td>Number of users (1982)</td>
<td>Nationality Profiles</td>
<td>Age/Sex Profiles</td>
<td>Trip Form</td>
<td>Travel Mode</td>
<td>Accommodation</td>
<td>Growth Rates</td>
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<tr>
<td>Mt Cook Group Ltd</td>
<td>scenic flights</td>
<td>20,000 to 30,000 people</td>
<td>Japanese, North Americans, Australians 25% of each</td>
<td>most 50 to 60 years</td>
<td>60% to 40% organised tours</td>
<td>private coach/ aeroplane mainly</td>
<td>hotel mainly</td>
<td>gradual decrease overall, small increase independent travellers, smaller percentage off each coach tour flying</td>
<td></td>
</tr>
<tr>
<td>Air Safaris (NZ) Ltd</td>
<td>scenic flights</td>
<td>15,000 to 25,000 people</td>
<td>70% Australians 15% other overseas</td>
<td>mostly under 30's</td>
<td>organised tours 70%</td>
<td>private coach mainly</td>
<td>motor camp to hotel</td>
<td>steady increase, more independent travellers, coach tour percentage decreasing</td>
<td></td>
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<tr>
<td>Whirlwide Ltd</td>
<td>scenic flights (helicopter)</td>
<td>-</td>
<td>50% Australians 10% North Americans 5% other overseas</td>
<td>mostly under 40's</td>
<td>80% camping tours</td>
<td>private coach mainly</td>
<td>mostly motor camp</td>
<td>increase 15 to 20% per year</td>
<td></td>
</tr>
<tr>
<td>Heliski Ltd and Alpine Guides (Mt Cook) Ltd</td>
<td>heli-skiing</td>
<td>600 people approximately</td>
<td>60% Australians 15% North Americans 10% other overseas</td>
<td>25 to 40 years</td>
<td>60 to 70% on organised tours</td>
<td>private coach/ rental cars mainly</td>
<td>70% hotel</td>
<td>very rapid increase</td>
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<tr>
<td>Name of Operation</td>
<td>Services Provided</td>
<td>Number of users (1982)</td>
<td>Nationality</td>
<td>Age/Sex Profiles</td>
<td>Trip Form</td>
<td>Travel Mode</td>
<td>Accommodation</td>
<td>Growth Rates</td>
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<tr>
<td>Glentanner Park (Mt Cook) Ltd</td>
<td>4-wheel drive tours, farm tours, guided fishing</td>
<td>-</td>
<td>majority Australians, few Japanese, North Americans</td>
<td>under 30 years (camping)</td>
<td>95% organised tours</td>
<td>private coach mainly</td>
<td>50% hotel, 50% motor camp</td>
<td>hotel market stable, decrease % Australians rapid increase camping tour market, increase independent travellers</td>
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<td></td>
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<td></td>
<td></td>
<td>20 to 60 years (hotel)</td>
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<tr>
<td></td>
<td>horse treks</td>
<td>10 to 40 people per day</td>
<td>mostly Australian</td>
<td>most 20 to 30 years</td>
<td>most organised tours</td>
<td></td>
<td>80% camping ground</td>
<td></td>
<td></td>
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<td></td>
<td>trail bikes</td>
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<tr>
<td>Lilybank Trophy Guide Services Ltd</td>
<td>safari hunting, guided fishing</td>
<td>less than 20 people</td>
<td>50% Australians, 50% North Americans</td>
<td>30 to 60 years mainly men</td>
<td>all independent travellers</td>
<td>aeroplane/private lodge</td>
<td>private steady increase</td>
<td></td>
<td></td>
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<tr>
<td>Lake Ohau Ski Field Ltd</td>
<td>skiing</td>
<td>15,000 plus people</td>
<td>30% Australians, few Japanese, North Americans</td>
<td>wide range</td>
<td>many Australians on ski packages, most others independent</td>
<td>private/public transport</td>
<td>private/public accommodation</td>
<td>steady increase overall, rapid increase Australians</td>
<td></td>
</tr>
<tr>
<td>Tekapo Ski Field Ltd</td>
<td>skiing</td>
<td>20,000 to 50,000 people</td>
<td>15% Australians</td>
<td>wide range</td>
<td>many independent travellers</td>
<td>private cars mainly</td>
<td>private/public accommodation</td>
<td>steady increase</td>
<td></td>
</tr>
<tr>
<td>Omarama Safari Tours</td>
<td>4-wheel drive tours, guided fishing</td>
<td>400 people</td>
<td>90% overseas</td>
<td>30 to 60 years</td>
<td>most organised tours</td>
<td>private coach</td>
<td>hotel mainly</td>
<td></td>
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<tr>
<td>Name of Operation</td>
<td>Services Provided</td>
<td>Number of uses (1982)</td>
<td>Nationality</td>
<td>Age/Sex Profiles</td>
<td>Trip Form</td>
<td>Travel Mode</td>
<td>Accommodation</td>
<td>Growth Rates</td>
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<tr>
<td>Benmore Charter Service</td>
<td>launch cruise</td>
<td>300 people</td>
<td>few overseas</td>
<td>wide range family groups</td>
<td>independent travellers</td>
<td>private cars</td>
<td>camping mostly</td>
<td>rapid increase</td>
<td></td>
</tr>
<tr>
<td>MacKenzie Country Safaris</td>
<td>guided fishing</td>
<td>less 20 people</td>
<td>75% Australian</td>
<td>independent travellers</td>
<td>rental car mainly</td>
<td>hotel</td>
<td>-</td>
<td></td>
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<tr>
<td>Fishing Guide B. Thornton</td>
<td>guided fishing</td>
<td>less 20 people</td>
<td>4/5 North American</td>
<td>independent travellers</td>
<td>rental car mainly</td>
<td>hotel</td>
<td>-</td>
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<tr>
<td>South Canterbury Safaris</td>
<td>guided fishing</td>
<td>very small numbers</td>
<td>overseas</td>
<td>independent travellers</td>
<td>-</td>
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<tr>
<td>Horse Treks G. Simpson</td>
<td>horse treks</td>
<td>50 to 100 people</td>
<td>mostly</td>
<td>most independent travellers</td>
<td>private car mainly</td>
<td>public/private accommodation</td>
<td>-</td>
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<td>Name of Operation</td>
<td>Services Provided</td>
<td>Ownership form</td>
<td>Staff Numbers</td>
<td>Land Tenure</td>
<td>Licence Agreements, Approvals</td>
<td>Dealings - Other Operators</td>
<td>Proposed Changes</td>
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<tr>
<td>Alpine Adventure</td>
<td>kayaking</td>
<td>owner/operator</td>
<td>3 partners (part time)</td>
<td>direct Crown ownership (lakes) unalienated Crown land/ leasehold</td>
<td></td>
<td>employ Air Safaris and Services (NZ) Ltd in some services</td>
<td>increase nordic skiing</td>
<td></td>
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<tr>
<td></td>
<td>nordic skiing</td>
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<tr>
<td>Alpine Recreation</td>
<td>guided tramping</td>
<td>owner/operator</td>
<td>1 owner plus 6 guides on casual basis (total operation)</td>
<td>leasehold, state forest, unalienated Crown land</td>
<td>recreational licences (Dept L&amp;S and NZFS) guides certified - NZ Professional Guides Assoc.</td>
<td>employ Air Safaris and Services (NZ) Ltd in some services</td>
<td>increase nordic skiing</td>
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<tr>
<td>Canterbury</td>
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<tr>
<td>Tramper</td>
<td>guided tramping</td>
<td>owner/operator</td>
<td>1 owner (part time)</td>
<td>leasehold, state forest, unalienated Crown land</td>
<td>recreational licences (Dept L&amp;S and NZFS)</td>
<td>employ Southern Alps Air Charter for air drops</td>
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<td>Service</td>
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<tr>
<td>Alpine Guides</td>
<td>rafting</td>
<td>private company</td>
<td>17-18 summer staff, 8 winter staff</td>
<td>national park</td>
<td>recreational licence (Dept L&amp;S) guides certified - NZ Professional Guides Assoc.</td>
<td>employ Mt Cook Lines in some services</td>
<td>increase market base by providing services for wider range age groups and expertise levels</td>
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<tr>
<td>(Mt Cook) Ltd</td>
<td>mountaineering</td>
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<tr>
<td>Alpine Guides</td>
<td>private, public</td>
<td></td>
<td>national park</td>
<td>recreational licences (Dept L&amp;S) licences - Ministry of Transport and Air Services Licensing Authority. Guides certified - NZ Professional Guides Assoc.</td>
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<tr>
<td>(Mt Cook) Ltd and</td>
<td>companies,</td>
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<tr>
<td>Mt Cook Group Ltd</td>
<td>unofficial</td>
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<td></td>
<td>association</td>
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<td>Name of Operation</td>
<td>Services Provided</td>
<td>Ownership form</td>
<td>Staff Numbers</td>
<td>Land Tenure</td>
<td>Licence Agreements, Approvals</td>
<td>Dealings - Other Operators</td>
<td>Proposed Changes</td>
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<tr>
<td>Mt Cook Group Ltd</td>
<td>scenic flights</td>
<td>public company</td>
<td>38 staff</td>
<td>national park</td>
<td>recreational licence (Dept L&amp;S) licences - Ministry of Transport and Air Services Licensing Authority</td>
<td>use Glentanner air strip in some services, small scale use of Tekapo ski field</td>
<td>widen market base to include camping tour sector</td>
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<tr>
<td>Air Safaris and Services (NZ) Ltd</td>
<td>scenic flights</td>
<td>private company</td>
<td>6 permanent staff 2 casuals (approx 10% of work non recreational)</td>
<td>landing strip leasehold, fly over many designations</td>
<td>recreational licence (Dept L&amp;S) licences - Ministry of Transport and Air Services Licensing Authority, approval - Mackenzie C.C.</td>
<td>approx. 45% of passengers flown from Glentanner, small scale use Tekapo ski field</td>
<td>expand into Omarama</td>
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<tr>
<td>Whirlwide Ltd</td>
<td>scenic flights (helicopter)</td>
<td>private company</td>
<td>1 pilot in Mt. Cook area (50% of employment is agricultural)</td>
<td>landing pad leasehold, fly over many designations</td>
<td>licences - Ministry of Transport and Air Services Licensing Authority</td>
<td>based at Glentanner station</td>
<td>possibly expand into Omarama</td>
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<tr>
<td>Heliski Ltd and Alpine Guides (Mt. Cook) Ltd</td>
<td>heli-skiing</td>
<td>private company plus unofficial association Alpine Guides</td>
<td>1 pilot and 2-4 guides (seasonal)</td>
<td>leasehold area</td>
<td>licences - Ministry of Transport and Air Services Licensing Authority, recreational licence (Dept L&amp;S) under consideration, Guides certified - NZ Professional Guides Assoc.</td>
<td>use Glentanner heli-pad (note: Heliski Ltd controlled by Glentanner Park Ltd and Whirlwide Ltd)</td>
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<td>Name of Operation</td>
<td>Services Provided</td>
<td>Ownership form</td>
<td>Staff Numbers</td>
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<td>Licence Agreements, Approvals</td>
<td>Dealings - Other Operators</td>
<td>Proposed Changes</td>
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<tr>
<td>Glentanner Park (Mt. Cook) Ltd</td>
<td>4 wheel drive/farm tours, guided fishing (N.Weatherley) horse treks (W.Berryman) trail bikes</td>
<td>private company, individual services controlled by operators under &quot;umbrella&quot; management arrangement</td>
<td>overall 15 staff, including part-time staff and guides employed</td>
<td>leasehold area, water bodies - direct Crown ownership</td>
<td>recreational licence (Dept L&amp;S) under consideration, approval - MacKenzie County Council, 4-wheel drive operator - licence Ministry of Transport, horse rides operator - approval Ministry of Agriculture and Fisheries</td>
<td>-</td>
<td>establish mountaineering school, expand range of services, establish week packages (services and accommodation)</td>
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<tr>
<td>Lilybank Trophy Guide Services Ltd</td>
<td>safari hunting guided fishing</td>
<td>private company</td>
<td>2 husband/wife teams 2 employees (-includes total farming operation)</td>
<td>leasehold area, water bodies - direct Crown ownership</td>
<td>recreational licence (Dept L&amp;S) licence - Ministry of Transport, approvals - NZFS, Ministry of Agriculture and Fisheries, Waitaki C.C. and R.W.B., and MacKenzie County Council</td>
<td>very small scale use local air services</td>
<td>-</td>
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<tr>
<td>Lake Ohau Ski Field Ltd</td>
<td>skiing</td>
<td>public company</td>
<td>20 to 30 seasonal staff</td>
<td>unalienated Crown land</td>
<td>recreational licence (Dept L&amp;S) approvals - Waitaki C.C. and R.W.B., and Waitaki County Council</td>
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<td>Name of Operation</td>
<td>Services Provided</td>
<td>Ownership form</td>
<td>Staff Numbers</td>
<td>Land Tenure</td>
<td>Licence Agreements, Approvals</td>
<td>Dealing - Other Operators</td>
<td>Proposed Changes</td>
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<tr>
<td>Tekapo Ski Field Ltd</td>
<td>skiing</td>
<td>private company</td>
<td>45 seasonal staff approx</td>
<td>leasehold area</td>
<td>recreational licence (Dept L&amp;S) approvals - Waitaki C.C. and R.W.B., and MacKenzie County Council</td>
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<tr>
<td>Omarama Safari Tours</td>
<td>4-wheel drive tours, guided fishing</td>
<td>owner/operator</td>
<td>1 owner (seasonal)</td>
<td>Clay Cliff area - freehold, water bodies direct Crown ownership</td>
<td>licence - Ministry of Transport</td>
<td>-</td>
<td>extend 4-wheel drive service destinations</td>
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<tr>
<td>Benmore Charter Services</td>
<td>launch cruise</td>
<td>owner/operator</td>
<td>1 owner (part time)</td>
<td>water bodies direct Crown ownership</td>
<td>licence - Ministry of Transport</td>
<td>-</td>
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<tr>
<td>MacKenzie Country Safaris</td>
<td>guided fishing</td>
<td>owner/operator</td>
<td>2 owners (part time)</td>
<td>water bodies direct Crown ownership</td>
<td>licence - Ministry of Transport</td>
<td>-</td>
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<tr>
<td>Fishing Guide B.Thornton</td>
<td>guided fishing</td>
<td>owner/operator</td>
<td>1 owner (part time)</td>
<td>water bodies direct Crown ownership</td>
<td>licence - Ministry of Transport</td>
<td>-</td>
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<tr>
<td>South Canterbury Fishing Safaris</td>
<td>guided fishing</td>
<td>owner/operator</td>
<td>1 owner (part time)</td>
<td>water bodies direct Crown ownership</td>
<td>-</td>
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<tr>
<td>Horse Treks G.Simpson</td>
<td>horse treks</td>
<td>owner/operator</td>
<td>1 owner (part time)</td>
<td>leasehold areas</td>
<td>-</td>
<td>-</td>
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