



## A. Permission Application Number and Name of Applicant **SUB 201**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Jesse Shepherd
Organisation	
Date	08/02/2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Agree to allow PTL to operate Turoa Ski field for 10 years and onwards if viable.

My reasons for my objection or submission are:

The proposal will balance commercial development and Maunga values by optimising lift operations in a changing climate. Their proposal seems to be well thought out and will benefit the communities nearby to continue to operate the ski field and concession.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

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## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

### How do I submit my objection or submission?

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## A. Permission Application Number and Name of Applicant SUB 202

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Printed name of submitter or person authorised on behalf of submitter	Tim Munro
Organisation	
Date	8 February 2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I believe that the proposal as put forward will be good for the community, hwi, skiers and environment.

My reasons for my objection or submission are:

I am a regular skier and visitor to Mt Ruapehu. I am also a life pass holder.

The outcomes that need to be addressed by this application are:  
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I support the application as submitted.

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Printed name of submitter or person authorised on behalf of submitter

Kristin Larsen

Organisation

Date

8/2/2024

**D. Statement of Support, Neutrality or Opposition**

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The specific parts of the application that this objection or submission relates to are:

- 1) I object to providing a concession for just the Turoa ski area thereby separating this ski area from the Whakapapa operation.
- 2) I object to the proposed length of the concession.
- 3) I object to the proposed concession because it doesn't best serve the interests of all stakeholders of the ski areas and the national park.

My reasons for my objection or submission are:

- 1) It does not make sense to split the two existing ski area operations (Turoa and Whakapapa) into separate entities. Successful management of these ski area operations is very difficult for many reasons that I'm sure you are already aware of, so I will not repeat them here. Having the two ski areas continue as one entity (either managed in the current form by RAL or by a new owner) will give the best opportunity for long term financial survival of the ski areas. Prior to RAL purchasing Turoa it had been managed as a for profit enterprise and had twice become insolvent and failed – if Turoa is again separated as a standalone entity the chances of this failure repeating is very high. Having the two ski areas remain as one enterprise creates synergies that greatly improve the chances of long-term financial survival. In particular the SkyWaka gondola on the Whakapapa ski area is a significant source of non-ski season revenue that will play an important role in the financial survival of the future operations – if Turoa is separated from Whakapapa and cut off from this source of revenue this greatly reduces the chances of financial survival for Turoa. The long-term financial success of the business is important if the operation is to best serve the stakeholder community. A financially successful operation will also have more resources to ensure they do their best to protect the natural environment within the concession area. DOC should not issue a concession to operate in the national park unless they have high confidence of long-term financial success.
- 2) Successfully managing a ski area operation requires long term planning and strategy. 10 years is far too short to allow the necessary long-term focus and far too short for investors to have confidence to provide capital. My understanding is that the existing RAL concession is for 60 years – this is a much more realistic timeframe to give a genuine chance of long-term success for the operation.
- 3) As I'm sure DOC is well aware there are many different stakeholders in the existing ski areas and interested parties with respect to the use of the natural assets in the national park, including multiple iwi groups. Managing and considering all of these different interests is complex and time consuming. In order to manage this process as effectively and efficiently as possible it makes sense to just have one party with one concession for operating both ski areas.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I cannot support a concession application that is for running just one ski area thereby splitting the existing operation in two. If Pure Turoa wish to bid for the purchase of the whole business including both ski areas and thereby change their concession application to be for both ski areas I would no longer oppose their application.

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Printed name of submitter or person authorised on behalf of submitter	Nicola Proffit
Organisation	
Date	08/02/24

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2) Successfully managing a ski area operation requires long term planning and strategy. 10 years is far too short to allow the necessary long-term focus and far too short for investors to have confidence to provide capital. My understanding is that the existing RAL concession is for 60 years – this is a much more realistic timeframe to give a genuine chance of long-term success for the operation.

3) As I'm sure DOC is well aware there are many different stakeholders in the existing ski areas and interested parties with respect to the use of the natural assets in the national park, including multiple iwi groups. Managing and considering all of these different interests is complex and time consuming. In order to manage this process as effectively and efficiently as possible it makes sense to just have one party with one concession for operating both ski areas.

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## C.2 Your name

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Printed name of submitter or person authorised on behalf of submitter

Robert Krebs

Organisation

Date

7.02.2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

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- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

- 1) Redacted Financials
- 2) Redacted names and experience of Key Management and Governance Personnel
- 3) Proposed removal of towlines - Nga Wai Heke, Giant, and Winter Garden Platter
- 4) PTL application for DoC concessions is disrespectful to the Tongariro National Park Treaty Settlement process. This concern has been expressed by Iwi: <https://newsroom.co.nz/2023/09/11/ruapehu-fields-not-commercially-viable-iwi-says/>
- 5) 10-year concession period being sought lacks credibility for any operator to make required investment to maintain the asset base
- 6) PTL have not consulted with the Life Passholders representatives.
- 7) Splitting Turoa from Whakapapa does not make sense from a financial stability perspective and a customer perspective

My reasons for my objection or submission are:

Firstly, financial concerns are relevant to the environment concerns because any operator which is not financially sound will leave redundant structures on the Turoa Skifield, and impede the public benefit under section 4 (2) (e) of the National Parks Act which clearly states that “*the public shall have freedom of entry and access to the parks, so that they may receive in full measure the inspiration, enjoyment, recreation, and other benefits that may be derived from mountains*”. Hence, for the public benefit to be preserved the operators plan must be fiscally responsible.

RAL found itself in financial difficulty due to an overly aggressive and poorly managed investment strategy that did not have any contingencies to weather the COVID pandemic lock downs in 2020 to 2021, and the extreme 2022 La Nina weather event. Previous RAL Boards had successfully weathered the volcanic eruptions in 1955 and 1997, followed by the extreme La Nina weather event in 1998 that ultimately tipped Turoa Holdings Limited into receivership and then acquired by RAL in 2000.

As a Life Passholder representative throughout this insolvency process, decisions that were made in relation to the Whakapapa development has compromised \$45 million worth of Life Passholder investment, of which approximately \$27 million was spent on developing the Turoa skifield which included the development of the high noon express chair.

As you can see understanding the financial business plan and strategy of PTL is critically important for myself and the public to make an informed opinion to assess whether the PTL proposal has credibility to weather volcanic eruptions, extreme La Nina weather events and poor snow seasons, pandemic lockdowns, and service the high capital requirements of the skifield operations.

It is concerning that PTL are requiring \$3m of Crown (taxpayer) support on day one. Note MBIE were responsible for loading RAL up with excessive debt levels with their provincial growth fund for the Sky Waka development for which they knew as a standalone project was marginally viable, but they invested anyway, ignoring the deferred maintenance risk on the Turoa side. Understanding Turoa's operating EBITDA trading forecasts and capital requirements is fundamental to ongoing commercial viability. History has taught us from the current RAL insolvency and experiences of previous private operators on Turoa, a debt funded model is high risk and susceptible to financial failure.

Publicly available information on the Turoa trading forecasts is available in The RAL DOCA feasibility Study which is published on the PwC RAL restructuring website <https://www.pwc.co.nz/pdfs/2023/feasibility-study.pdf>

Turoa trading forecasts project an operating EBITDA of between \$335k and \$286k over the next five years. Ongoing capital requirements of the skifield are projected between \$5.7m and \$1.3m per annum over the next five years. The ongoing minimum capital requirements for Turoa are forecasted at a minimum of \$1m per annum thereafter. PTL would need to quadruple the current Operating EBITDA performance of the existing Turoa operations to be remotely viable as a standalone entity. Given Turoa's historical private ownership models have had tenures ranging between 4 and 10 years, I have limited confidence that Turoa will be financially viable as a standalone operation. In my professional opinion as a trained Business Analyst and Accountant (CPA), the PTL proposal appears financially risky based on publicly available data and puts at risk the public enjoyment of the national park. Yes, there is government investment of 25% ownership in PTL, but this does not inspire confidence given there was already \$15 million of government investment in RAL too prior to its insolvency and here we are, the government did not backup its provisional growth fund investment and has pulled the plug on RAL creating huge uncertainty to the region.

PTL's strategy to reduce lifts (Nga Wai Heke, Giant, Winter Garden Platter) requires further scrutiny. Other competitor skifields in the South Island are expanding their operations and consolidating their ownership models. PTL are going against industry trends. Removing lifts limits the skiable terrain and limits the skifield operators' ability to distribute skiers across the slope. It is important to manage slope capacity because once this threshold is exceeded this is detrimental to the public enjoyment of the national park as you get skier traffic congestion on the slopes and other underlying health and safety risks. This is likely to lead to unsatisfied customers which is a real concern should Turoa's support base become frustrated and choose alternative ski destinations that provide a better customer experience due to more diversity in the skiable terrain and greater slope capacity.

RSSA have surveyed the skiing community and they have shown a strong preference to keep the skifields together and for a community ownership model. PTL application to split the skifields fails to listen to the wishes of the Turoa Skifields major customer support base, which is not limited to the Ohakune Business Community, but it is the entire North Island distributed from Wellington at the bottom to Northland at the top. The commerce commission have acknowledged that combining Whakapapa and Turoa Skifields has a public benefit.

PTL have said at the watershed meeting that their business model does not include Life Passholders, and they have not consulted with the Life Passholder representatives, hiding behind non-disclosure agreements and commercial sensitivity. This is in despite of Life Passholders being the single largest and most consistent form of capital for the skifields. This risks thousands of Life Passholders moving their financial support to alternative ski operators in the South Island and overseas, and alternative recreational activities. They no longer will have a life interest invested in the Turoa skifield. RSSA surveys show that Life Passholders spend on lift tickets for their families and friends, food beverage, rental, lessons, retail and a range of other on mountain services. Disrespecting the Life Passholders contribution to the Turoa skifield is likely to erode the customer and support base which will have a financial viability impact on the Turoa skifield and financial flow on effects to surrounding local businesses as thousands of Life Passholders and their families choose to support alternative recreational holiday destinations.

The reduced scale of the PTL operation in terms of lifts and operational capacity, removing Life Passholders from the business model, and splitting the skifields against the public wishes, all raises concerns on how PTL will remain financially viable to cover their corporate overhead and support costs with what appears to be a plan to diminish its customer base? The RAL forecast model corporate overhead assumptions in the RAL DOCA feasibility report show that the Turoa share of the corporate overhead is \$3.7m per annum. RAL presumably has the benefit of economies of scale where the corporate overhead costs can be shared across the two fields. For example, the financial support services can manage the finances for both Skifields. For example, you cannot chop your CEO, Chief Financial Operator and Marketing Director costs in half very easily. Presumably it will be difficult for PTL to get their corporate overhead and support costs at or below the \$3.7m per annum allocation per RAL's books without the benefit of economies of scale. Further, PTL plan to reduce overall skier capacity from 5,500 visitors to 4,500 visitors. This lacks credibility on the basis that one would assume they would if anything need to increase operational scale and capacity to cover their fixed corporate overhead costs. Unsurprisingly, I am not alone in my assessment that scale is needed for commercial viability. Another bidder, Ngāti Tūwharetoa Trust Chief Executive Nigel Chee stated " *We have undertaken commercial and legal due diligence with support of KPMG and Bell Gully which has demonstrated that the ability for any operator to continue operating the skifields requires a significant increase and expansion of operations for there to be commercial viability*" ([Ruapehu fields don't make sense, bidder says \(newsroom.co.nz\)](https://www.newsroom.co.nz/news/ruapehu-fields-dont-make-sense-bidder-says)).

The 10-year concession period being sought lacks credibility to attract investment in the tens of millions for new lifts. The operating EBITDA potential is insufficient to allow a payback on the capital employed. PTL say they will invest in new lifts. I cannot believe this based on a 10-year concession period being sought. My understanding of the

legislation is that they can apply for 30 year and 60-year concessions. This would be a much more reasonable investment horizon. I note an article published 8<sup>th</sup> February 2024 in the New Zealand Herald “Buyer for insolvent Ruapehu Alpine Lifts’ main skifield walks away”, the bidder WHL has walked away from the deal with one of the reasons being the 10 years concession period being offered by DoC. WHL Director Elworthy is quoted saying “*no sane person is going to take on a business with a looming \$15 m debt [repayment], deferred maintenance and the other risks, and a very short concession*”. The new lifts being proposed by PTL are likely to cost in the ballpark of \$15 million and with the short concession period being sought, it is unrealistic to expect PTL to fulfil that investment promise.

Ruapehu is a difficult skifield operation to operate, it is susceptible to extreme weather events, world’s most extreme rime icing, volcanic activity, high capital requirements to maintain the assets. This environment requires the oversight of a highly experienced Executive Management and Governance Team with credible experience in operating, managing and governing skifields. PTL or DoC have redacted the names and experience of PTL’s key personnel. Why would you not allow the public to know who the key personnel are? This is a public consultation process is it not?

Lastly, the issuing of concessions lacks respect for the Tongariro National Park Treaty settlement process. I support Iwi’s very reasonable request that the sale of RAL assets should not be prejudice to their Treaty Negotiations and therefore should be delayed until the conclusion of their negotiations. Note, RAL is still in operation and therefore by far the simplest solution available to the Crown is to forgive their debt (Our taxpayer debt) to RAL a public benefit entity that was established for the benefit of the public. They have agreed to forgive their debt to allow Private Bidders to purchase RAL assets for \$1, while not offer the same deal to the existing operator that is a public benefit entity? This solution would provide certainty to the public’s right to enjoyment of the National Park.

In conclusion, due to the redacted financials, redacted information on key personnel and governance, there is no clear evidence to support the financial credibility of the PTL proposal. Based on the publicly available information on Turoa as a standalone operation and its historical performance, short lived private ownership models, I must oppose on the basis that the PTL application is a financially risky proposition. The Turoa skifield should remain as part of the whakapapa skifield to provide financial stability and certainty to the regional for the benefit and the enjoyment of the people to access the Tongariro Nation Park.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

- 1) Clear business plan outlining financial assumptions, trading forecasts, capital expenditure, sources of funding, balance sheet, revenue and visitor targets, corporate administration, and overhead costs.
- 2) Information on names and experience of key personnel.
- 3) Confirmation from Iwi that the consultation process is to their satisfaction and the sale of RAL assets will not prejudice their TNP treaty negotiations.

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Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
RSSA Financial Feasibility Report	PDF	Report contains financial information on Turoa trading forecasts which are referred to in my application commentary. Refer to page 22 of report.
Newsroom: Ruapehu fields don't make financial sense, bidder says	PDF	News article on Iwi position regarding the commercial viability of the skifield and TNP treaty process.
NZ Herald: Buyer for insolvent Ruapehu Alpine Lifts' main skifield walks away	PDF	News article explains that WHL have walked away from their deal based on lack of government support and short-term length of concessions being offered by DoC to not make financial sense for the level of debt and risk taken on.

### How do I submit my objection or submission?

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## PROPOSAL FOR WHAKAPAPA AND TUROA SKIFIELDS

Financial Feasibility Study – 9<sup>th</sup> June 2023



Ruapehu Skifields  
Stakeholders Association



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## Introduction

Ruapehu Alpine Lifts went into voluntary Administration on the 11th of October 2022. The Ruapehu Skifields Stakeholders Association (RSSA) has prepared a proposal to support the continuation of both Whakapapa and Tūroa Skifields. The proposal involves retaining both Whakapapa and Tūroa skifields under the existing Ruapehu Alpine Lifts (RAL) company. This will involve adjusting the RAL Trust and Company board composition, appointing new members, and revising the RAL Trust and Company constitution to align with the community-led Ruapehu Skifield Governance Framework.

Both Ministry of Business Innovation and Enterprise (MBIE) and ANZ have offered publicly to forgive the pre Voluntary Administration debts of \$15m. This means that the existing RAL entity will be solvent and a viable company again.

Most importantly, this will ensure the 2023 ski season can proceed immediately as RAL holds the licence concessions. In addition, there will not need to be a transition to a NewCo which risks a delayed or no 2023 winter season.

The existing RAL entity will be re-capitalised by Life Passholders, and wider community stakeholders such as Ski Club members, season passholders, local community, and local businesses. The ski community are the natural owners of the skifield assets because they are the ones who will support the skifields in good years and in bad.

The RSSA was started by a mix of volunteers from the local community, life pass holders, season pass holders, former mountain staff and local businesses. Several of the founding members were members of the RAL Shareholders and Life Pass Holders Group. The RAL Shareholders and Life Pass Holders Facebook Group was originally created in 2016 as a place for the shareholders of RAL to connect and discuss areas of common interest regarding the company. Over time, the group had advocated for more transparency from the Company, Board of Directors, and the Shareholding Trust (who acts as the legal majority shareholder).

# RSSA vision for the Skifields on Mt Ruapehu

Based on feedback and engagement with our wider groups over the last six months, we are proposing the following:

1. **Retain both Tūroa and Whakapapa** under the same company ownership where profits are reinvested in the skifields not paid out in dividends. This provides the following benefits:
  - a. The ability to achieve economies of scale for efficient corporate overhead and support costs.
  - b. The winter ski season is short and with climate change likely to further shorten the ski season over time, therefore efficient corporate overhead is critical to the long-term financial sustainability of both skifields. DOC concessions are unlikely to change which limits the ability to develop further on mountain summer revenue streams. Tūroa is limited to a winter only revenue stream, DOC concessions limit summer on-mountain activities, therefore Tūroa will rely on cost efficiencies in the corporate administration from economies of scale with Whakapapa.
  - c. Keeping both fields together maximises crowdfunding potential in the form of Season Passes, Equity, and Life Passes. Surveys tell us the community has a strong preference to retain both ski fields as community-owned operations.
  - d. Having two skifield operations provides diversification to weather risk and volcanic risk. For example: The Highnoon Express Chair on Tūroa is within the 2km Volcanic precautionary exclusion area and therefore cannot operate at volcanic alert level 2.
  - e. Historical data shows that Tūroa's ownership has been unstable as a standalone skifield with ownership changing hands within four to ten years. Tūroa was stable for 20 years when combined with Whakapapa and only came into trouble when RAL pivoted away from its crowdfunding business model to become a debt funded business to finance the Sky Waka Gondola and other redevelopment programs.
2. **Community ownership structure and governance model**
  - a. RAL had operated successfully for its first 60 years by only spending money that it actually had (low debt model). The model worked and only became broken under the most recent 10 year governorship, which wandered down the pathway of ever more corporatisation. This inevitably led to a high debt model. Further, poor strategic planning had simply not made provision for the poor seasons that inevitably come around, for various reasons, beyond the control of the company. Examples being eruptions, La Nina, COVID and more. We believe that a revised/revived/reset RAL can again be a successful company with a significant amount of fiscal efficiency and good governance.
  - b. RSSA will retaining both Whakapapa and Tūroa Ski fields under the existing Ruapehu Alpine Lifts (RAL) company.

- c. Fundamental to this will be the appointment of new Directors appointed to the Board with a range of skills appropriate to those required to run ski fields.
- d. A feature of the old RAL was inadequate representation of the core stakeholders. This had the unfortunate effect of isolating the Board from any real accountability. Our proposal intends to address this issue via the new shareholding and governance structures. Better representation of the key stakeholders including Iwi, DOC, Council(s), local businesses, clubs, and mountain users will help ensure transparency, accountability, and good governance.
- e. As such, the Company will arrange for new RAL Trust Board members and Company Directors in the interim to ensure the 2023 season gets underway and the necessary governance changes are made. Following the 2023 season all board members will stand for re-election under the revised constitution and governance rules.

### **3. Financed through creditors writing down debt and most importantly, the mountain community**

- a. Throughout the Voluntary Administration we have kept a dialogue with key creditors. The two largest secured creditors, MBIE & ANZ have indicated that they would be prepared to write off those debts and release their securities. Given this was assumed fundamental to the creation of any viable NewCo, we likewise see this as also fundamental to the viability of the 'refurbished' RAL. Indeed, the whole reasoning behind the VA was that the previous directors saw themselves as insolvent. If you remove the MBIE and ANZ debits off the liability side of the balance sheet RAL is no longer insolvent. We are asking those secured creditors to write-off the pre-VA debt and to consider doing similar to the (post) VA debt.
- b. Use community investment to help recapitalize the company. The cornerstone of this crowdfunding would be the LPH's as recognised creditors, but it is essential that the greater snow community are also willing to donate/invest in order to reach the \$ target required.
- c. Maintain the current non-profit customer-owned status - specifically that all profit is reinvested back into the ski fields for the development of amateur snow sports within the Tongariro National Park. Retaining tax free status is important but may be worth compromising on to allow for investor capital gains (while still retaining the profit reinvestment clauses).

As a broad community, RSSA have inclusive mechanisms (social media, email and surveys) to canvas the wide range of views from the community, as well as regular engagement with representative groups such as RMCA and Iwi, to respect their enduring interests in the mountain.

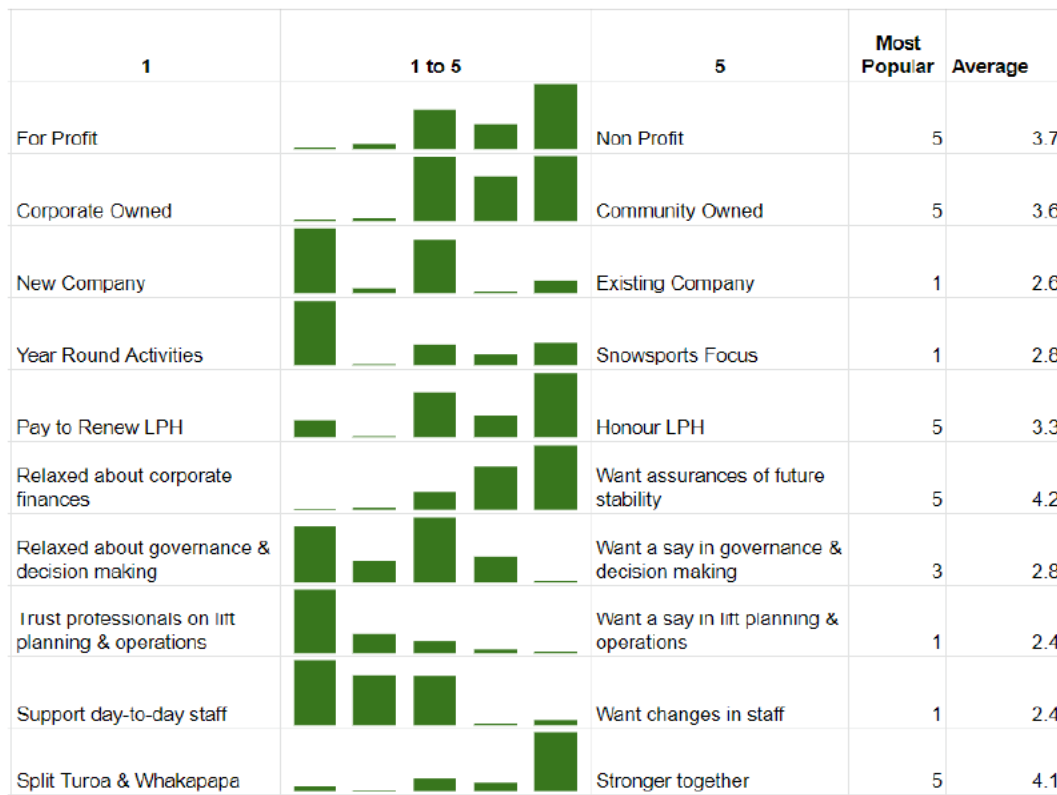
## Vision of the Community

Our 2022 Governance Survey received over 900 responses and we have conducted extensive community consultation through social media, in person meetings and grass roots engagement. Opinions were divided on some issues and do vary by stakeholder type. But there are some key themes that can be observed. Key observations from the crowd:

- They want a community-owned not-for-profit organisation
- They want assurances of financial stability
- They want to retain Whakapapa and Tūroa as one entity

Source: <https://www.savemtruapehu.org.nz/post/mt-ruapehu-crowdfunding>

**Figure 1: What the Crowd are saying from the Governance Survey**



## Proposed Governance Structure

### RSSA (Stakeholders Association)

- Association protecting members interests in the long-term stability, transparency and good governance of the ski fields.
- RAL will issue the RSSA with % of material or "golden shares". This is to prevent corporate takeovers and changes to the constitution.
- Promotion of Life pass holder settlement fees into RAL.
- The Association to appoint 2 of RAL directors.
- The board representatives will host an annual meeting to provide updates on RAL performance, hear feedback from members and vote to direct the board representatives.
- In addition to the elected board representatives, there will also be a range of sub committees in the society to allow for diverse viewpoints, active participation.
- Example participants would include (1) Leadership Committee, (2) Life pass Holders (3) Iwi, (4) Businesses, (5) Environmental etc. These participants would consult with relevant stakeholders and (through the Board Representatives) assist RAL with special projects, advice and input.



### Equity Crowd Funding

- RAL will issue general shares to raise capital to everyone.
- General Shareholders do not attract dividends (but may be able to achieve a capital appreciation if the share price increases).
- Likely to be mountain users, clubs, local business etc. who all rely on the industry.
- General shareholders to appoint 3 of RAL directors elected by vote at the RAL AGM.

- Bondholders have no shares in RAL unless they choose to via the equity crowd funding.
- Bondholders to appoint 1 of RAL directors.
- Bondholders receive investment % return (coupons).
- Provides ability to raise capital for major investments.
- Current Bondholders include, Iwi investment companies, local trusts, councils and individuals.

### Bondholders

**Note:** Having the right individuals in the boardroom is critical. Corporate directors need to have the skills, experience, and perspectives that align with the company's long-term strategy. The number and % on the board of the revamped RAL above is a example only and is still to be confirmed. There will also be comprehensive risk governance mechanisms in place to ensure robust governance as well suitability for the required tasks.

### **Our proposed co-operative governance structure provides the following benefits:**

- Seamless continuation of skiing for the 2023 season and beyond due to existing licence concessions continuing.
- Retaining both Whakapapa and Turoa Ski fields.
- Co-operative style businesses have twice the survival rate of other businesses in NZ. This born out by New Zealand's largest and longest surviving companies such as Farmlands, Fonterra, Southern Cross etc. some of which are over 100 years old. The key reason for this longevity is the cooperative nature by all stakeholders involved.
- The ability for capital investment in major infrastructure.
- Ensuring all stakeholders including Iwi, local community and businesses, mountain clubs and general mountain users are properly represented in the future.
- Long-term stability, transparency and good governance of the skifields.
- Key stakeholder representation at Board level.
- Ensure no single shareholder group has total control of the operator(s).
- Ensure profit is reinvested back into the ski fields which helps improve the assets and manage risk.
- Promote innovative thinking, quality leadership at managerial level.
- Help ensure a back-to-basics focus to get the fundamentals of operating the ski fields right.

## **Methodology**

The financial feasibility report has used data from following sources:

- RAL Management trading forecasts from the RAL Long Term Financial Model.
- PwC Administrators Progress Report.
- Ruapehu Skifields Stakeholders Association survey data and research.

Financial feasibility assumptions modelled are documented under the assumptions section of the report.

## Executive Summary

The RSSA proposal will retain both Whakapapa and Tūroa Skifields under the existing RAL structure (pending review/restructure). Whakapapa is financially viable on its own having both a summer and winter trading season. However, Tūroa has been limited to a winter trading window from June to October. This has meant it was carrying corporate overhead and support costs over the summer with no supporting revenue. The modelling of the RSSA is that Tūroa will struggle to be financially viable long-term as a standalone skifield.

## Whakapapa and Tūroa Existing Structure & Assumptions

1. A Deed of Company Arrangement will reduce RAL debt at appointment of Voluntary Administration from approximately \$59m down to circa \$24m. The DOCA contains the current working consensus on the commercial terms of the creditors' compromise. The financial modelling for capital planning in this Feasibility Study anticipates the following creditor treatment:
  - a. To set up finance to build the Sky Waka a number of Bondholdings were established with security over the Sky Waka itself. The Bondholders will be paid in full on schedule.
  - b. MBIE Pre Voluntary Administration debt of \$15 will be forgiven.
  - c. ANZ Pre Voluntary Administration debt of \$12.7m will be forgiven.
  - d. All trade and minor creditors valued at \$2m will be paid over a 5 year period.
  - e. Remaining employee liabilities of \$124k will be paid out in FY23.
  - f. MBIE post VA debt of \$5.5m will be paid over 10 years. No interest payable.
  - g. ANZ post VA debt of \$1m will be paid back over 2 years. No interest payable.
  - h. Ruapehu District Council loan debt of \$500k will be stretched out to FY32
  - i. Deferred Life Pass revenue in advance of \$14.7m will be extinguished. Life Passholders who wish to retain their Life Pass benefits for the 2023 ski season and beyond will be required to pay a one-off re-activation payment of \$1,150 (GST inclusive).
  - j. \$1.3M outstanding VA and other legal costs in FY23.



2. Life Passholders have always been fundamental to the capital raising that is the lifeblood of our ski areas. The woes that have beset RAL have brought to light the unfortunate reality that, should LP holders wish to continue to enjoy our Maunga, skiing 'for free' into the future without contributing towards the company's survival at this key moment is simply not viable. Further funds are required. The model anticipates that LP will contribute \$7.5m as a settlement payment (ex GST) to maintain their right to continue to ski. It is estimated based on our survey data that 7,500 Life Passholders will accept the settlement payment of \$1,000. We have forecast that \$4m of the Life Passholder settlement fee will be collected in FY23 and \$3.5m will be collected in FY24.
3. The right to levy a re-activation fee for the life passes arises from the ability of a Deed of Company Arrangement to vary the terms and treatment of a creditor. Many of the life passes also contain clauses that allow for variations to the terms of service. The overwhelming feedback from the Life Pass Holders is that they want to support the company in these difficult times and are willing to pay a re-activation fee to retain the right to ski.
4. A further \$10m will be raised from community skifield stakeholders across a 5-year period at approximately \$2m per annum under the Equity Crowdfunding scheme. There are approximately 25,000 Ski Club members, 10,000 Life Passholders, and RAL has a 100,000 customer database to crowdfund equity investment from. RSSA Community and Life Passholder survey's have already identified \$13m in expressed community equity interest to crowdfund the recapitalisation of the Whakapapa and Tūroa skifields.
5. The cost of the Community Equity Raise using a licensed Crowdfunding platform such as Snowball effect is estimated at \$550k. This is based on a success fee of 7.5% in year one and 5% in years two to five.
6. The stakeholders association have organised expressions of interest from a small number of wholesale investors willing to provide short-term bridging finance to RAL through a line-of-credit facility. These short-term loans will make \$2M available to the company to meet payroll obligations and short-term operating costs. The facilities are conditional on execution of the DOCA on terms substantially similar to the form presented (in particular the director and shareholder clauses). The short-term loans will receive a general security (not ranking above any existing securities) and will be paid back through operating cashflow during the 2023 winter season.
7. The company will immediately release the 2023 Season Passes for sale. Based on historic performance, this will generate a rapid injection of several million dollars in operating cashflow.
8. The Life Pass re-activation fee will be made available for purchase as a product on the company's website within 7 days. Based on LPH feedback to date, this will generate several million dollars in immediately available cash.
9. The company can mitigate the seasonal liquidity crunch risk in future years by bringing forward the Life Pass Sale campaigns to sell new Life Passes (scheduled in the model for FY28) to FY23. The PwC Voluntary Administration community survey identified \$9m in new Life Pass sale interest and \$7m in

5-year season pass interest. The seasonal cash short fall risk is also mitigated in our forecasts by stretching out the repayment of the \$2m of trade and minor creditors across a five year period.

10. A new Life Pass Capital raise for \$10.5m for the sale of 1,600 Life Passes is used to finance the repayment of the Bondholders in FY28. The purpose of this capital raise is for maintaining sufficient liquidity levels to mitigate seasonal risk. Our view is that a closing cash position at the end of a winter ski season should be targeted at a minimum of \$15m. This ensures adequate working capital to fund the summer maintenance program to get to the next winter season and have a proportion of funds set aside to build up an endowment fund for a rainy day and to meet emergency capital expenditure requirements.
11. \$250k contingency has been budgeted for restructuring costs FY23 (may also be spread over 2024).
12. The Tūroa Skifield financial viability is significantly stronger when combined with Whakapapa. The two skifields together can achieve economies of scale for the management of the corporate overhead and shared support services function which includes HR, Finance, IT and procurement.
13. As a public benefit entity, RAL is currently exempt from income tax under section CW 40 (1) of the Income Tax Act 2007. This mitigates the income tax consequences of the proposed loan forgiveness. If the status changes or the tax treatment of the loan forgiveness generates an income tax obligation the cashflow consequences can be serviced from within the operating cashflow forecasts.
14. As a widely held company, RAL is subject to the Takeovers Code. This restricts the issue or acquisition of a controlling interest in the company. The company is currently operating under a Takeovers Code Exemption granted in 2022 for the purposes of re-organising the company's affairs. The anticipated re-structuring would appear to fall within the recently granted exemption and if required, an additional exemption would be sought on terms similar to the recent exemption.

## Concession: Asset Remediation and Removal

The DOCA proposal maintains the existing operating concessions and the existing remediation liabilities which sit with the company. To a purely commercial investor, the remediation obligations may seem onerous. However, as a ski community we see the remediation obligations as an enduring reminder of the need for the skifields to tread lightly, to tidy up after ourselves, and to always be planning for ways to minimise our impact on the surrounding environment. We see all physical assets and infrastructure on the mountain as temporary installations that should be robust, modular and designed from the start for eventual removal.

The RSSA understands that the Maunga is sacred to the Tangata Whenua. Indeed, it is to us too. We note that a number of redundant structures have been simply left un-remediated on the skifields. Junk. The requirement to remediate is enshrined in the law. These scars on Koro are simply not acceptable! We intend to do the right thing and undertake a program of remediation.

Our vision is to get together with Iwi to identify/stocktake the offending structures (mostly old foundations, but right up to old ski club buildings!) and to draw up a priority 'shopping list' of which to attack first and the timeline to achieve the best outcome in a sustainable way.

Capital expenditure of \$750k has been budgeted in FY25. If the cash position of the allows, it is the view of the RSSA that this remediation work should be brought forward to start from the summer of FY23. The Tangata Whenua have waited long enough for this restoration work. Further funds will be applied to the task into the future.

The RSSA will advocate to ensure the Skifield Operator acts as responsible and respectful guest on the Maunga.

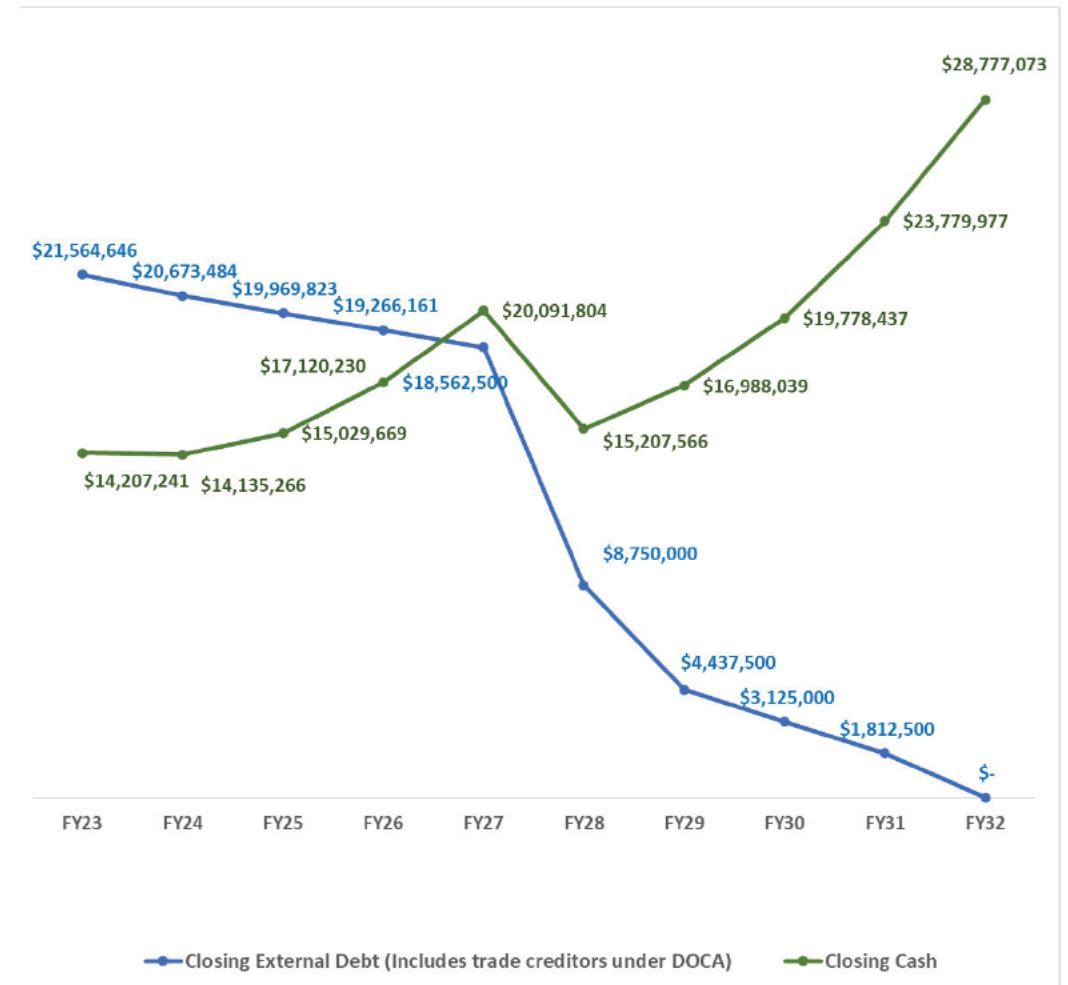
## Headline KPI's

The following table shows the key observations between the Whakapapa and Tūroa operation versus the Whakapapa only operation.

**Table 1: Headline KPIs**

	Whakapapa & Turoa
Life Passholder Capital from Settlement Payment FY23 to FY24	\$ 7,500,000
Community Crowdfunding - FY23 to FY27	\$ 10,000,000
Less: Costs of Equity Crowdfunding -FY23 to FY27	-\$ 550,000
New Life Passholder Sales - FY28	\$ 10,480,000
<b>Recapitalisation - Strategy</b>	<b>\$ 27,430,000</b>
Bondholder coupons paid FY23 to FY29	-\$ 7,214,970
Net Operational cash flows (Normalised for timing differences) <i>*Includes Bondholder coupon payments, prior year pre-season sales, includes Life Passholder revenue recognised)</i>	\$ 69,060,985
<b>Capital expenditure FY23 to FY30</b>	<b>-\$ 38,294,000</b>
<b>Capital expenditure as % operating cash flows</b>	<b>55%</b>
Bondholder Principal repayments FY23 to FY29	-\$ 13,500,000
Ruapehu District Council FY32	-\$ 500,000
ANZ VA Debt Principal repayments FY23 to FY24	-\$ 1,000,000
MBIE VA Debt Principal repayments FY23 to FY32	-\$ 5,500,000
<b>Debt Forgiven</b>	<b>\$ 42,333,172</b>
Life Passholders - Deferred Revenue	\$ 14,660,086
ANZ pre-Voluntary Administration	\$ 12,673,086
MBIE pre-Voluntary Administration	\$ 15,000,000
Net Assets FY23	\$ 32,543,584
Net Assets FY32	\$ 38,498,862
<b>Closing Cash position FY32</b>	<b>\$ 28,777,073</b>
FY32 Endowment Fund (Rainy Day Fund and Capital Fund)	\$ 19,000,000
FY32 Working Capital	\$ 9,777,073
External Debt FY23	\$ 21,564,646
External Debt FY32	\$ -

**Figure 2: Debt position versus Cash position**



## Financial Modelling: Observations

1. \$7.5m Life Passholder Capital is raised across FY23 and FY24 from the re-activation fee
2. \$10m Community Crowd funding is raised across FY23 to FY27 from equity investment
3. No direct Crown funding required. An underwrite facility may be requested due to MBIE's role in causing a delay in the 2023 season pass campaign. The underwrite is not guaranteed or required for the proposal to proceed.
4. Total capital injection net of capital raising costs is \$27.4m across the forecast period. This includes \$7.5m in re-activation payments from existing Life Passholders, \$10m in community equity raising, and \$10.5m in a new Life Pass Capital raise.
5. Ruapehu District Council debt of \$500k repaid in FY32
6. \$1m Post-VA ANZ bank debt is repaid by over 10 years and fully repaid in FY32
7. \$5.5m Post-VA MBIE debt is paid over 10 years and is fully repaid in FY32
8. Approx \$42m of Debt is forgiven under the DOCA arrangement. This includes \$14.7m in deferred Life Passholder revenue, \$12.7m in pre-VA ANZ bank debt, \$15m in pre-VA MBIE debt.
9. Normalised net operating cash flows (Cash flows normalised for timing differences in life pass and season pass cash flows) are \$69m across the forecast period.
10. Total capital expenditure for the Whakapapa and Tūroa operation is \$38m. This represents 55% of the normalised operating cash flows.
11. A new Life Pass capital raise of \$10.5m is required to repay \$9.5m bond debt maturing in FY28.
12. Bondholders are forecast to be paid \$7.2m in coupon payments across the forecast period.
13. Bondholders are fully repaid at maturity dates. \$9.5m in FY28 and \$4m in FY29.
14. Closing FY32 cash position is \$29m which is broken down into \$10m working capital and \$19m endowment fund. The endowment funds consists of \$5m to cover operating shortfalls for a "Rainy Day" or "poor snow season". \$14m is accumulated in the Capital Fund for the future replacement of ageing lifts infrastructure. For example, it is known to RSSA that the next significant lift upgrades are likely to be required to be prioritised on the replacement of the bottom lift access at Tūroa. The purpose of the capital fund is to save cash reserves to complete these projects without being reliant on risky debt financing.
15. By FY32 RAL is essentially debt free and 100% funded by the ski community and retained operating cash flows.
16. FY32 Net Assets are \$38.5m. An increase of \$6m from FY23 Net Asset position of \$34m.

## Contingency Funds: Capital Improvement Fund and Rainy Day Fund

Figure 3: Rainy Day Fund and Capital Fund accumulated cash balance (forecast FY23 to FY32)

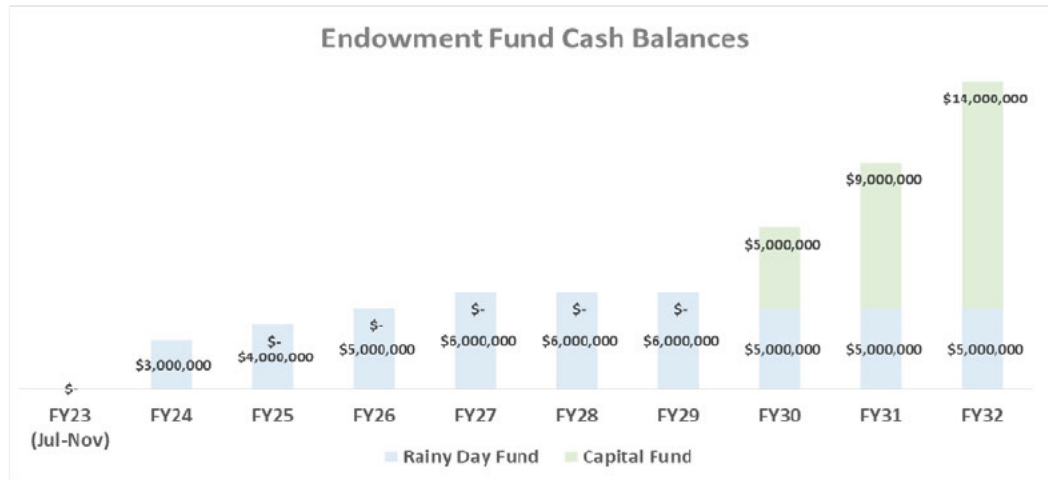
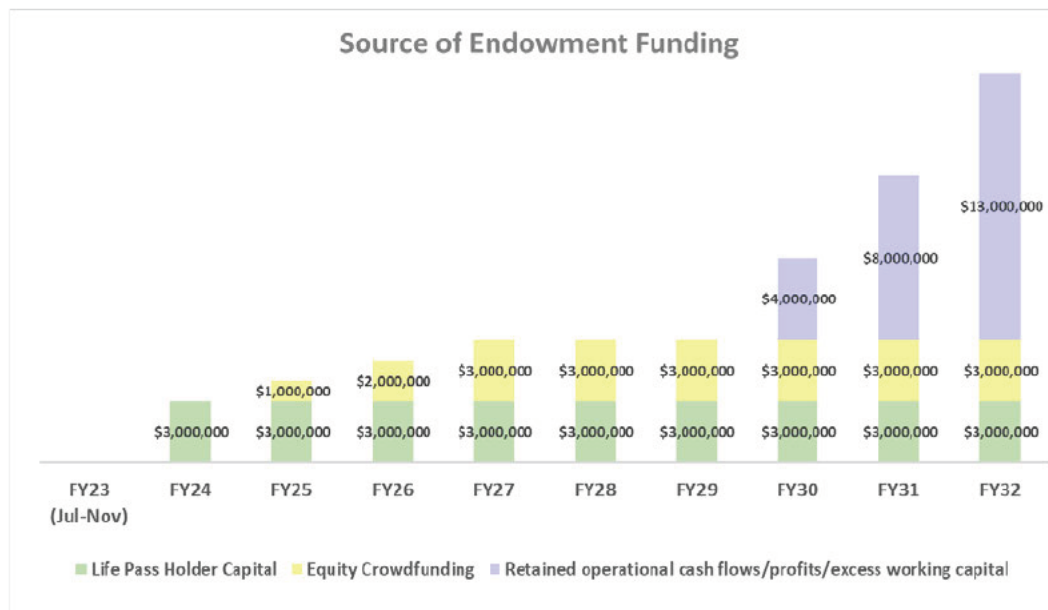


Figure 4: Cash source for the accumulation of the Rainy Day and Capital Funds



**Contingency Funds:** The failure of the old RAL governance was that cash reserves were not set aside for a rainy day such as the FY22 extreme La-Nina weather event and the 2020 to 2021 global COVID pandemic.

A second failure of the old RAL governance was that cash reserves were not set aside to manage the ageing asset infrastructure. For example, the \$25 million deferred maintenance liability of which the majority of the deferred maintenance relates to the Tūroa assets.

The new and improved RAL governance plan will involve setting aside cash reserves to survive a poor season, volcanic event, or a future global pandemic. Secondly, the improved RAL governance plan will involve setting aside funds for future capital replacement works.

The following two graphs in figure 3 and 4 show that \$19m in cash reserves will be accumulated by FY32. Of this endowment fund, \$14m will be accumulated for a future life replacement. It is estimated a new lift will cost in the vicinity of \$18m. This positions RAL to be well placed to invest in a new express chair lift to replace the two ageing Tūroa access chair lifts (Parklane and Movenpick) which are getting close to the end of their useful life.

As can be seen in figure 4, the **Capital Improvement Fund** relies on retained operational cash flows, whereas the **Rainy-Day Fund** can be quick established using the Life Passholder Settlement payment and Equity crowdfunding raise. Establishing the rainy day fund will be the immediate priority.

Second priority is to repay back creditor debt. From FY30, majority of the creditor debt has been repaid and then this allows for the accumulation of the capital fund.

# RAL Whakapapa and Tūroa Projections

Table 2: Whakapapa and Tūroa Cash Flow Projections FY23 to FY32

Cash Flow Forecast - Whakapapa & Turoa	FY23 (Jul-Nov)	FY24	FY25	FY26	FY27	FY28	FY29	FY30	FY31	FY32
<b>Operating Cash flows</b>										
<b>Operating EBITDA</b>	\$ 7,103,216	\$ 4,708,418	\$ 5,710,127	\$ 5,967,516	\$ 6,416,892	\$ 7,022,710	\$ 7,779,981	\$ 8,726,571	\$ 9,909,808	\$ 11,367,848
Adjusted for non-cash life pass revenue	-\$ 400,000	-\$ 750,000	-\$ 750,000	-\$ 750,000	-\$ 750,000	-\$ 1,798,000	-\$ 1,798,000	-\$ 1,798,000	-\$ 1,798,000	-\$ 1,798,000
Adjusted for gondola coupon payments	-\$ 419,708	-\$ 918,690	-\$ 1,181,116	-\$ 1,233,406	-\$ 1,377,205	-\$ 1,556,953	-\$ 527,893	\$ -	\$ -	\$ -
Adjusted for Interest Earnings	\$ -	\$ 142,458	\$ 144,054	\$ 160,111	\$ 185,548	\$ 175,506	\$ 138,884	\$ 174,328	\$ 202,232	\$ 239,747
Adjusted for Advance Season Pass Sales (Oct-Nov)	\$ -	-\$ 5,000,000	-\$ 5,500,000	-\$ 6,000,000	-\$ 6,500,000	-\$ 7,000,000	-\$ 3,500,000	-\$ 7,000,000	-\$ 7,000,000	-\$ 7,000,000
<b>Net operating cashflow</b>	\$ 6,283,508	-\$ 1,817,814	-\$ 1,576,935	-\$ 1,855,778	-\$ 2,024,764	-\$ 3,156,738	\$ 2,092,972	\$ 102,899	\$ 1,314,040	\$ 2,809,596
*Net operating cashflow including prior year advance season pass sales	\$ 6,283,508	\$ 3,182,186	\$ 3,923,065	\$ 4,144,222	\$ 4,475,236	\$ 3,843,262	\$ 5,592,972	\$ 7,102,899	\$ 8,314,040	\$ 9,809,596
**Normalised operating cash flows to include Life Pass revenues recognised	\$ 6,683,508	\$ 3,932,186	\$ 4,673,065	\$ 4,894,222	\$ 5,225,236	\$ 5,641,262	\$ 7,390,972	\$ 8,900,899	\$ 10,112,040	\$ 11,607,596
<b>Non-operating cash flows</b>										
NEWCO restructuring costs	-\$ 250,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Remaining VA & Legal costs	-\$ 1,200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Employee benefits	-\$ 124,105	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Creditors - (DOCA payment over 5 years)	-\$ 391,161	-\$ 391,161	-\$ 391,161	-\$ 391,161	-\$ 391,161	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Total Non-operating Cash flows</b>	-\$ 1,965,267	-\$ 391,161	-\$ 391,161	-\$ 391,161	-\$ 391,161	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Capital Expenditure</b>										
Whakapapa	-\$ 339,000	-\$ 2,575,000	-\$ 2,925,000	-\$ 2,100,000	-\$ 1,875,000	-\$ 1,970,000	-\$ 2,000,000	-\$ 2,000,000	-\$ 2,000,000	-\$ 2,000,000
Turoa	-\$ 122,000	-\$ 5,688,000	-\$ 1,800,000	-\$ 1,650,000	-\$ 1,325,000	-\$ 3,925,000	-\$ 1,000,000	-\$ 1,000,000	-\$ 1,000,000	-\$ 1,000,000
<b>Less Capital expenditure</b>	-\$ 461,000	-\$ 8,263,000	-\$ 4,725,000	-\$ 3,750,000	-\$ 3,200,000	-\$ 5,895,000	-\$ 3,000,000	-\$ 3,000,000	-\$ 3,000,000	-\$ 3,000,000
<b>Financing Cash flows</b>										
Life Passholder settlement payment	\$ 4,000,000	\$ 3,500,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
New Life Pass Capital Raise	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 10,480,000	\$ -	\$ -	\$ -	\$ -
Advance 5 year season pass	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Advance Season Pass Sales (Oct-Nov)	\$ 5,000,000	\$ 5,500,000	\$ 6,000,000	\$ 6,500,000	\$ 7,000,000	\$ 3,500,000	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000
Crowdfunded Equity raises from Life Pass Holders, Clubbies, Community	\$ 2,000,000	\$ 2,000,000	\$ 2,000,000	\$ 2,000,000	\$ 2,000,000	\$ -	\$ -	\$ -	\$ -	\$ -
Equity Raising Costs	-\$ 150,000	-\$ 100,000	-\$ 100,000	-\$ 100,000	-\$ 100,000	\$ -	\$ -	\$ -	\$ -	\$ -
Repayment of Gondola Bonds	\$ -	\$ -	\$ -	\$ -	\$ -	-\$ 9,500,000	-\$ 4,000,000	\$ -	\$ -	\$ -
Repayment of RDC (DOCA - Payment end of FY32)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	-\$ 500,000
Repayment of ANZ VA loan (DOCA payment over two years)	-\$ 250,000	-\$ 250,000	-\$ 62,500	-\$ 62,500	-\$ 62,500	-\$ 62,500	-\$ 62,500	-\$ 62,500	-\$ 62,500	-\$ 62,500
Repayment of MBIE VA loan (DOCA payment over 10 years)	-\$ 250,000	-\$ 250,000	-\$ 250,000	-\$ 250,000	-\$ 250,000	-\$ 250,000	-\$ 250,000	-\$ 1,250,000	-\$ 1,250,000	-\$ 1,250,000
<b>Net financing cashflows</b>	\$ 10,350,000	\$ 10,400,000	\$ 7,587,500	\$ 8,087,500	\$ 8,587,500	\$ 4,167,500	\$ 2,687,500	\$ 5,687,500	\$ 5,687,500	\$ 5,187,500
<b>Net Cash flow (Operating + CAPEX + Financing + Other)</b>	\$ 14,207,241	-\$ 71,975	\$ 894,404	\$ 2,090,560	\$ 2,971,574	-\$ 4,884,238	\$ 1,780,472	\$ 2,790,399	\$ 4,001,540	\$ 4,997,096
Opening cash balance	\$ -	\$ 14,207,241	\$ 14,135,266	\$ 15,029,669	\$ 17,120,230	\$ 20,091,804	\$ 15,207,566	\$ 16,988,039	\$ 19,778,437	\$ 23,779,977
Closing cash balance	\$ 14,207,241	\$ 14,135,266	\$ 15,029,669	\$ 17,120,230	\$ 20,091,804	\$ 15,207,566	\$ 16,988,039	\$ 19,778,437	\$ 23,779,977	\$ 28,777,073
Liquidity ratio %	66%	68%	75%	89%	108%	174%	383%	633%	1312%	n.a
<b>External Borrowing balance (Including trade creditors under DOCA)</b>	\$ 21,564,646	\$ 20,673,484	\$ 19,969,823	\$ 19,266,161	\$ 18,562,500	\$ 8,750,000	\$ 4,437,500	\$ 3,125,000	\$ 1,812,500	\$ -
<b>Liquidity Management</b>										
Working Capital Cash Opening	\$ -	\$ 14,207,241	\$ 11,135,266	\$ 11,029,669	\$ 12,120,230	\$ 14,091,804	\$ 9,207,566	\$ 10,988,039	\$ 9,778,437	\$ 9,779,977
Stress test opening cash position- Surplus/Shortfall	\$ 5,822,508	\$ 4,126,427	\$ 4,833,331	\$ 5,423,891	\$ 6,895,465	\$ 5,040,066	\$ 8,300,539	\$ 8,090,937	\$ 8,092,477	\$ 9,589,573
Working Capital Cash closing	\$ 14,207,241	\$ 11,135,266	\$ 11,029,669	\$ 12,120,230	\$ 14,091,804	\$ 9,207,566	\$ 10,988,039	\$ 9,778,437	\$ 9,779,977	\$ 9,777,073
Endowment fund closing	\$ -	\$ 3,000,000	\$ 4,000,000	\$ 5,000,000	\$ 6,000,000	\$ 6,000,000	\$ 6,000,000	\$ 10,000,000	\$ 14,000,000	\$ 19,000,000
Bondholder return on capital	3%	7%	9%	9%	10%	12%	13%	na	na	na

Table 3: Whakapapa and Tūroa Activity KPI's

Other KPI's Metrics	FY23 (Jul-Nov)	FY24	FY25	FY26	FY27	FY28	FY29	FY30	FY31	FY32
Whakapapa - skier and winter sight seeing visitor days	186,156	275,051	285,511	285,511	285,511	285,511	285,511	285,511	285,511	285,511
Whakapapa winter visitor capacity	436,000	436,000	436,000	436,000	436,000	436,000	436,000	436,000	436,000	436,000
Whakapapa winter capacity utilisation	43%	63%	65%	65%	65%	65%	65%	65%	65%	65%
Whakapapa summer sightseeing	na	46,191	71,729	78,902	98,627	123,284	154,105	192,631	240,789	300,000
Turoa Skier days	83,211	158,000	158,000	158,000	158,000	158,000	158,000	158,000	158,000	158,000
Turoa visitor capacity	240,000	240,000	240,000	240,000	240,000	240,000	240,000	240,000	240,000	240,000
Turoa winter capacity utilisation	35%	66%	66%	66%	66%	66%	66%	66%	66%	66%
<b>Operating Revenue</b>	<b>\$ 22,039,117</b>	<b>\$ 38,494,333</b>	<b>\$ 39,785,707</b>	<b>\$ 40,345,824</b>	<b>\$ 40,916,144</b>	<b>\$ 41,794,552</b>	<b>\$ 42,892,563</b>	<b>\$ 44,265,076</b>	<b>\$ 45,980,718</b>	<b>\$ 48,102,263</b>
Whakapapa	\$ 23,062,073	\$ 24,353,447	\$ 24,913,564	\$ 25,483,884	\$ 26,362,293	\$ 27,460,303	\$ 28,832,816	\$ 30,548,458	\$ 32,670,003	
Turoa	\$ 15,432,260	\$ 15,432,260	\$ 15,432,260	\$ 15,432,260	\$ 15,432,260	\$ 15,432,260	\$ 15,432,260	\$ 15,432,260	\$ 15,432,260	\$ 15,432,260

Table 3 shows the Skier and visitor day assumptions in the RAL Management trading forecasts. From FY25, Skier days and winter visitor numbers stabilise at approximately 285,500 for Whakapapa and 158,000 for Tūroa. Whakapapa is operating at 65% capacity and Tūroa is at 66% capacity. The available capacity is for midweek skiing as we understand on fine weather days during weekends, both skifields will often reach their capacity limits.

Whakapapa sightseeing is forecast to steadily grow to approximately 300,000 visitors by FY32. Our understanding is that Sky Waka is not well marketed, and many of the Tourism bus groups visiting the region have not included a Sky Waka visitor into their tour schedules. This lack of marketing is mostly attributable to the timing of the COVID-19 pandemic lock downs, followed by the voluntary administration process.



**Table 4: Whakapapa and Tūroa Balance Sheet Projections**

<b>Balance Sheet - Whakapapa &amp; Turoa</b>	<b>1st July 2023</b>	<b>FY23 (Jul-Nov)</b>	<b>FY24</b>	<b>FY25</b>	<b>FY26</b>	<b>FY27</b>	<b>FY28</b>	<b>FY29</b>	<b>FY30</b>	<b>FY31</b>	<b>FY32</b>
<b>Current Assets</b>											
Cash	\$ -	\$ 14,207,241	\$ 14,135,266	\$ 15,029,669	\$ 17,120,230	\$ 20,091,804	\$ 15,207,566	\$ 16,988,039	\$ 19,778,437	\$ 23,779,977	\$ 28,777,073
<b>Total current assets</b>	\$ -	\$ 14,207,241	\$ 14,135,266	\$ 15,029,669	\$ 17,120,230	\$ 20,091,804	\$ 15,207,566	\$ 16,988,039	\$ 19,778,437	\$ 23,779,977	\$ 28,777,073
<b>Non-Current Assets</b>											
Property Plant and equipment	\$ 54,070,722	\$ 48,500,989	\$ 50,213,122	\$ 48,623,122	\$ 46,123,122	\$ 43,109,789	\$ 42,611,789	\$ 39,411,789	\$ 36,211,789	\$ 33,011,789	\$ 29,811,789
<b>Total Assets</b>	\$ 54,070,722	\$ 62,708,230	\$ 64,348,388	\$ 63,652,791	\$ 63,243,352	\$ 63,201,593	\$ 57,819,355	\$ 56,399,827	\$ 55,990,226	\$ 56,791,766	\$ 58,588,862
<b>Current liabilities</b>											
LP Revenue in-advance	\$ -	\$ 400,000	\$ 750,000	\$ 750,000	\$ 750,000	\$ 750,000	\$ 1,798,000	\$ 1,798,000	\$ 1,798,000	\$ 1,798,000	\$ 1,798,000
Season Pass Revenue in-advance	\$ -	\$ 5,000,000	\$ 5,500,000	\$ 6,000,000	\$ 6,500,000	\$ 7,000,000	\$ 3,500,000	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000
Accounts Payable (DOCA - payment terms stretched)	\$ 1,955,807	\$ 1,564,646	\$ 1,173,484	\$ 782,323	\$ 391,161	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Employee entitlements	\$ 124,105	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
ANZ - VA loan (DOCA - Debt partially forgiven, payment terms stretched)	\$ 1,000,000	\$ 750,000	\$ 500,000	\$ 437,500	\$ 375,000	\$ 312,500	\$ 250,000	\$ 187,500	\$ 125,000	\$ 62,500	\$ -
MBIE - VA loan (DOCA - Debt partially forgiven, payment terms stretched)	\$ 5,500,000	\$ 5,250,000	\$ 5,000,000	\$ 4,750,000	\$ 4,500,000	\$ 4,250,000	\$ 4,000,000	\$ 3,750,000	\$ 2,500,000	\$ 1,250,000	\$ -
PwC Administrator Fee & Legal estimate	\$ 1,200,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>Total Current liabilities</b>	\$ 9,779,912	\$ 12,964,646	\$ 12,923,484	\$ 12,719,823	\$ 12,516,161	\$ 12,312,500	\$ 9,548,000	\$ 12,735,500	\$ 11,423,000	\$ 10,110,500	\$ 8,798,000
<b>Non-current Liabilities</b>											
RDC Loan (DOCA - payment terms stretched)	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ 500,000	\$ -
ANZ Debt (DOCA - Debt forgiven)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
MBIE Debt (DOCA - Debt forgiven)	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
RAL Gondola Bonds	\$ 13,500,000	\$ 13,500,000	\$ 13,500,000	\$ 13,500,000	\$ 13,500,000	\$ 13,500,000	\$ 4,000,000	\$ -	\$ -	\$ -	\$ -
Life Pass revenue in advance	\$ -	\$ 3,200,000	\$ 5,600,000	\$ 4,850,000	\$ 4,100,000	\$ 3,350,000	\$ 18,484,000	\$ 16,686,000	\$ 14,888,000	\$ 13,090,000	\$ 11,292,000
<b>Total non-recurrent Liabilities</b>	\$ 14,000,000	\$ 17,200,000	\$ 19,600,000	\$ 18,850,000	\$ 18,100,000	\$ 17,350,000	\$ 22,984,000	\$ 17,186,000	\$ 15,388,000	\$ 13,590,000	\$ 11,292,000
<b>Total Liabilities</b>	\$ 23,779,912	\$ 30,164,646	\$ 32,523,484	\$ 31,569,823	\$ 30,616,161	\$ 29,662,500	\$ 32,532,000	\$ 29,921,500	\$ 26,811,000	\$ 23,700,500	\$ 20,090,000
<b>Net Assets</b>	\$ 30,290,810	\$ 32,543,584	\$ 31,824,903	\$ 32,082,969	\$ 32,627,190	\$ 33,539,093	\$ 25,287,355	\$ 26,478,327	\$ 29,179,226	\$ 33,091,266	\$ 38,498,862
Current ratio	0%	110%	109%	118%	137%	163%	159%	133%	173%	235%	327%
Liquidity ratio (Cash/external borrowings)	0.00%	96.32%	97.48%	104.10%	119.10%	140.38%	320.16%	2470.99%	3164.55%	4227.55%	na

The net assets of RAL decline from \$30m to low point of \$25m in FY28. However, once RAL has reduced its debt level and repaid the bondholder debt, Net Assets start to rebuild to a closing balance of \$38.4m in FY32.

# Detailed Modelling Assumptions – Combined Whakapapa and Tūroa Skifields

## Overview of Assumptions

The assumptions have been derived from the following sources:

- RAL Management trading forecasts from the RAL Long Term Financial Model.
- PwC Six Month Voluntary Administrators Report.
- Ruapehu Skifields Stakeholders Association survey data and research.

The cash flow projections in the forecast are in net of GST. For simplicity assumes GST credits are claimed and paid within the forecast period.

## Capital Raising Assumptions

*Table 5: Capital and Equity Raising Assumptions*

	FY23	FY24	FY25	FY26	FY27
Crown Capital Grant/Equity					
Crowdfunded Equity	\$ 2,000,000	\$ 2,000,000	\$ 2,000,000	\$ 2,000,000	\$ 2,000,000
Equity Raising costs	7.5%	5.0%	5.0%	5.0%	5.0%
Equity Raising costs \$	-\$ 150,000	-\$ 100,000	-\$ 100,000	-\$ 100,000	-\$ 100,000
Estimated LP Settlement Payment available for combined fields	\$ 4,000,000	\$ 3,500,000			
Life Passholder Equity % splits					
Whakapapa	55%	55%	55%	55%	55%
Turoa	45%	45%	45%	45%	45%
Whakapapa Life Pass Settlement Payment Allocation	\$ 2,200,000	\$ 1,925,000	\$ -	\$ -	\$ -
Turoa Life Pass Settlement Payment Allocation	\$ 1,800,000	\$ 1,575,000	\$ -	\$ -	\$ -
Life Passholder Equity modelled	\$ 4,000,000	\$ 3,500,000	\$ -	\$ -	\$ -

- No financial input is required from the Crown. However, a \$5m underwrite may be requested for the five-year capital raising period and due to the fact that MBIE have compromised the 2023 winter season pass campaign. It is conservatively assumed that no bank will provide a high-risk seasonal business working capital facility.
- \$2m Equity Crowdfunding per 12-month period. \$10m to be raised across the five-year forecast period. Community Equity Raising survey has identified \$13m in expressed community interest. The findings of this survey is published on the RSSA website [here](#). 72% of Life Passholders participating in a previous Capital Raising survey conducted prior to voluntary administration indicated a willingness to purchase equity to help recapitalize the company. This survey represented 11% of the 14,000 Life Passholders.

- \$550k cost of raising \$10m Equity. This assumes a success fee of 7.5% in year one and 5% in years two to five.
- Life Passholders to provide \$7.5m in cash through the re-activation fee. Life pass capital is to be raised across FY23 and FY24 financial periods due to the RAL database contact details being incomplete, hence it will take time to communicate with every life passholder. Note the Life Passholder capital will not be treated as equity for legal reasons (FMCA limits on share sales), it will legally be in the form of a product purchase. Life Passholders will also be able to purchase direct equity ownership in RAL and/or join the RSSA to have an indirect ownership interest through RSSA membership rights.
  - The current Life Passholder Settlement Payment survey indicates 70% of Life Passholders will accept the \$1,000 re-activation payment, 17% are unsure and 13% have said no. We estimate once a credible plan is put forward 75% of Life Passholders will accept the re-activation payment.
  - We estimate that there are 10,000 active Life passholders. This is based on discussion with RAL management on utilisation of Life Passes over the recent five years.
  - The Life Pass Settlement Survey Results are available on the RSSA website. 3,253 individuals responses have been received. These responses represent 5,599 passes. This means the survey currently represents approximately 56% of the Life Passes.
  - The results of the Life Passholder survey can be found on the RSSA website [here](#).

## Capital Expenditure Assumptions

The Capital expenditure for the FY23 and FY28 forecast has been sourced from RAL VA capital expenditure forecasts. FY29 to FY32 capital expenditure is taken from the RAL Long Term Financial Model.

**Table 6: Capital Expenditure Assumptions (GST exclusive)**

Capital Expenditure assumption	FY23	FY24	FY25	FY26	FY27	FY28	FY29	FY30	FY31	FY32
Whakapapa	-\$ 339,000	-\$ 2,575,000	-\$ 2,925,000	-\$ 2,100,000	-\$ 1,875,000	-\$ 1,970,000	-\$ 2,000,000	-\$ 2,000,000	-\$ 2,000,000	-\$ 2,000,000
Turoa	-\$ 122,000	-\$ 5,688,000	-\$ 1,800,000	-\$ 1,650,000	-\$ 1,325,000	-\$ 3,925,000	-\$ 1,000,000	-\$ 1,000,000	-\$ 1,000,000	-\$ 1,000,000
<b>Total CAPEX</b>	<b>-\$ 461,000</b>	<b>-\$ 8,263,000</b>	<b>-\$ 4,725,000</b>	<b>-\$ 3,750,000</b>	<b>-\$ 3,200,000</b>	<b>-\$ 5,895,000</b>	<b>-\$ 3,000,000</b>	<b>-\$ 3,000,000</b>	<b>-\$ 3,000,000</b>	<b>-\$ 3,000,000</b>
CAPEX notes/source data	Post VA	Post VA	Post VA	Post VA	Post VA	Post VA	RAL model	RAL model	RAL model	RAL model

The Tūroa Skifield has three ageing lifts being the Movenpick, Parklane, and the Giant. Future operational efficiencies have been identified by industry experts that these three lifts could be replaced by one single detachable express chair lift. The ballpark cost of a lift installation in today's terms is estimated to be in the realm of \$14 million. The current feasibility study has modelled capital expenditure and trading forecasts based on maintaining the status quo.

## Operating EBITDA Assumptions

The operating EBITDA assumptions for FY23 have been taken from the RAL FY23 forecast for the winter months being 1<sup>st</sup> July 2023 to 30<sup>th</sup> November 2023.

Operating EBITDA assumptions from FY25 to FY32 have been taken from the 2.12 RAL Long Term Financial model. Table 8 below shows the operating EBITDA assumptions and RSSA adjustments for Life Pass deferred revenues, new life pass sales and Life Passholder re-activation payments.

*Table 7: Operating EBITDA assumptions modelled and RSSA adjustments*

Financial performance assumption	FY23	FY24	FY25	FY26	FY27	FY28	FY29	FY30	FY31	FY32
	<b>RAL FY23 Forecast (July to November)</b>									
<b>Data Source</b>		<b>RAL model</b>	<b>RAL model</b>	<b>RAL model</b>	<b>RAL model</b>	<b>RAL model</b>	<b>RAL model</b>	<b>RAL model</b>	<b>RAL model</b>	<b>RAL model</b>
RAL Management forecast Operating EBITDA										
Whakapapa		\$ 3,623,899	\$ 4,651,301	\$ 4,917,395	\$ 5,380,064	\$ 6,004,314	\$ 6,784,626	\$ 7,760,017	\$ 8,979,255	\$ 10,481,692
Turoa		\$ 334,519	\$ 308,825	\$ 300,121	\$ 286,828	\$ 268,396	\$ 245,355	\$ 216,554	\$ 180,553	\$ 136,157
Total Operating EBITDA per source data	\$ 8,379,020	\$ 3,958,418	\$ 4,960,127	\$ 5,217,516	\$ 5,666,892	\$ 6,272,710	\$ 7,029,981	\$ 7,976,571	\$ 9,159,808	\$ 10,617,848
<b>RSSA adjustments</b>										
Add LPH Settlement Payment Revenue	\$ 400,000	\$ 750,000	\$ 750,000	\$ 750,000	\$ 750,000	\$ 750,000	\$ 750,000	\$ 750,000	\$ 750,000	\$ 750,000
Deferred RAL LP revenue oldCo - Whakapapa	Deferred Life Pass Revenue is already excluded from RAL Model Operating EBITDA									
Deferred RAL LP revenue oldCo - Turoa										
<b>20% EBITDA reduction for delayed season pass campaign</b>	<b>-\$ 1,675,804</b>									
Add Operating EBITDA increases for New Life Pass sales						New Life Pass Sales well utilised in first 5 years - Assume no operating EBITDA increase - Revenue simply received in advance				
<b>Operating EBITDA for RSSA modelling</b>	\$ 7,103,216	\$ 4,708,418	\$ 5,710,127	\$ 5,967,516	\$ 6,416,892	\$ 7,022,710	\$ 7,779,981	\$ 8,726,571	\$ 9,909,808	\$ 11,367,848

In the FY23 July to November forecast, the operating EBITDA has been reduced to by \$1.68m. This is to recognise a 20% operating EBITDA deduction due to the delayed season pass sales campaign. The additional Life Passholder re-activation payment is reported as deferred revenue and is amortised over 10 years and therefore increases the operating EBITDA. This amortisation of this revenue is added back onto the operating EBITDA by an average of \$750k per annum.

The EBITDA forecasts in the 2.12 RAL Long Term Financial Model are already adjusted to remove the \$1.75m deferred Life Passholder revenue.

It is important to note in the operating cash flow model, the non-cash life pass deferred revenue and settlement payments have been adjusted as non-cash items to ensure the operating cash flows are not overstated.

**Table 8: 2.12 RAL Long Term Financial Model Trading Forecast projections**

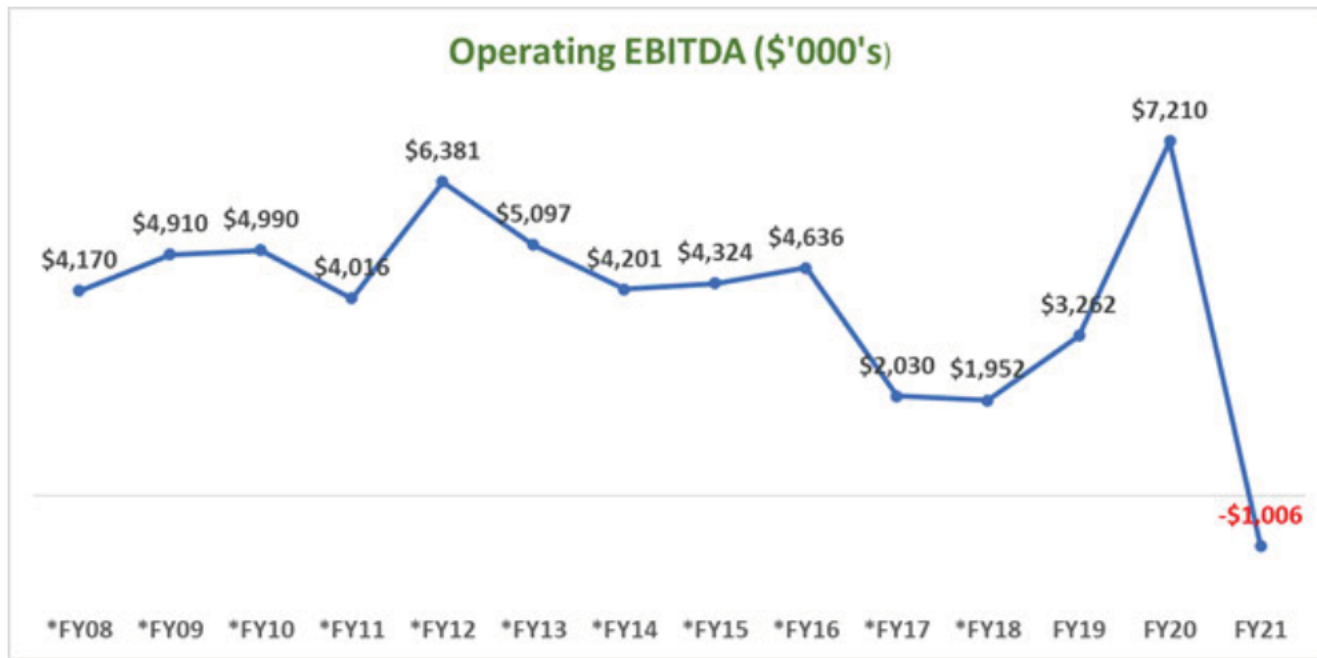
	2024	2025	2026	2027	2028	2029	2030	2031	2032
	\$'000s	\$'000s	\$'000s	\$'000s	\$'000s	\$'000s	\$'000s	\$'000s	\$'000s
<b>RAL Enterprise Value</b>									
<b>Whakapapa</b>									
Whakapapa Net Operating Contribution - Winter	9,208	9,692	9,703	9,715	9,732	9,754	9,782	9,816	9,858
Whakapapa Net Operating Contribution - Summer	634	1,211	1,477	1,946	2,577	3,365	4,351	5,583	7,101
Whakapapa corporate overhead allocation	-5,218	-5,252	-5,262	-5,280	-5,304	-5,334	-5,372	-5,419	-5,477
Whakapapa non-cash winter life pass revenue	-1,001	-1,001	-1,001	-1,001	-1,001	-1,001	-1,001	-1,001	-1,001
<b>Whakapapa EBITDA</b>	<b>3,624</b>	<b>4,651</b>	<b>4,917</b>	<b>5,380</b>	<b>6,004</b>	<b>6,785</b>	<b>7,760</b>	<b>8,979</b>	<b>10,482</b>
Whakapapa Gondola coupon payments	-919	-1,181	-1,233	-1,377	-1,557	-1,782	-2,062	-2,414	-2,845
Whakapapa Capex allocation	-2,525	-2,200	-1,875	-1,800	-2,000	-2,000	-2,000	-2,000	-2,000
<b>Whakapapa Free Cash Flow before change in working capital &amp; tax</b>	<b>180</b>	<b>1,270</b>	<b>1,809</b>	<b>2,203</b>	<b>2,447</b>	<b>3,003</b>	<b>3,698</b>	<b>4,566</b>	<b>5,636</b>
<b>Tūroa</b>									
Tūroa Net Operating Contribution	4,746	4,746	4,746	4,746	4,746	4,746	4,746	4,746	4,746
Tūroa corporate overhead allocation	-3,665	-3,690	-3,699	-3,712	-3,731	-3,754	-3,783	-3,819	-3,863
Tūroa non-cash winter life pass revenue	-746	-746	-746	-746	-746	-746	-746	-746	-746
<b>Tūroa EBITDA</b>	<b>335</b>	<b>309</b>	<b>300</b>	<b>287</b>	<b>268</b>	<b>245</b>	<b>217</b>	<b>181</b>	<b>136</b>
Tūroa Capex allocation	-2,675	-3,000	-1,875	-1,150	-1,000	-1,000	-1,000	-1,000	-1,000
<b>Tūroa Free Cash Flow before change in working capital &amp; tax</b>	<b>-2,340</b>	<b>-2,691</b>	<b>-1,575</b>	<b>-863</b>	<b>-732</b>	<b>-755</b>	<b>-783</b>	<b>-819</b>	<b>-864</b>

Lastly, in FY28 we introduce a Life Pass sale to repay the Bondholders. We have not increased the operating EBITDA to reflect this Life Pass sale. We assume this revenue in-advance cannibalises some of the future day pass and season pass sales, therefore is already factored into the operating EBITDA forecast. Life Passes are heavily utilised in the first five years of purchase and then usage typically declines after five years. This is due to lifestyle changes of the life passholder. In the operating cash flows, we have adjusted FY28 to FY32 operating cash flows to reflect the advanced life pass revenue received to ensure the Life Pass revenue is not being doubled counted in the operating EBITDA cash flow.

It is important to note that Life Passholders will spend on other mountain services such as food and beverage, retail, ski school and other services which will be captured in the operating EBITDA.

Based on historical performance and given the latest Sky Waka investment, there should be opportunities to improve the trading forecasts by reviewing the operational model and the corporate overhead and support services function. FY20 was the highest operating EBITDA result (excludes Covid subsidies) despite being a Covid impacted year with a lockdown event.

**Figure 5: Historical Operating EBITDA Trends (Operating EBITDA methodology per RAL Alternative Reports)**



### Advance Season Pass Sale Assumptions

At the end of the ski season, it is normal practice to have an early bird season pass campaign to fund working capital to pay for the summer maintenance program. Being a seasonal business with a July to October trading window, advance season pass sales help to de-risk the cash flows. Table 9 below shows the advance season pass sale assumptions. Note in FY28 there is a Life Pass capital raise. This will cannibalise part of the advance season pass campaign.

We have split the season pass sales 54% Whakapapa and 46% Tūroa based on the season pass skier days in the 2.12 RAL Long Term Financial Model.

Note the season pass sale for the 2023 winter season will be captured in the operating EBITDA cash flow assumptions. It is not reported as revenue in-advance as of 30 November 2023 for the 2023 season.

**Table 9: Advance Season Pass Sales (Oct - Nov)**

	FY23	FY24	FY25	FY26	FY27	FY28	FY29	FY30	FY31	FY32
Advance season pass campaign (Combined fields)	\$ 5,000,000	\$ 5,500,000	\$ 6,000,000	\$ 6,500,000	\$ 7,000,000	\$ 3,500,000	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000
% split Wakapapa	54%	54%	54%	54%	54%	54%	54%	54%	54%	54%
% split Turoa	46%	46%	46%	46%	46%	46%	46%	46%	46%	46%
Whakapapa	\$ 2,715,369	\$ 2,986,906	\$ 3,258,443	\$ 3,529,980	\$ 3,801,516	\$ 1,900,758	\$ 3,801,516	\$ 3,801,516	\$ 3,801,516	\$ 3,801,516
Turoa	\$ 2,284,631	\$ 2,513,094	\$ 2,741,557	\$ 2,970,020	\$ 3,198,484	\$ 1,599,242	\$ 3,198,484	\$ 3,198,484	\$ 3,198,484	\$ 3,198,484
Advance season pass campaign - Modelled	\$ 5,000,000	\$ 5,500,000	\$ 6,000,000	\$ 6,500,000	\$ 7,000,000	\$ 3,500,000	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000

Table 10 shows the historical season pass and life pass cash trends per analysis of cash flows in the audited reports. As can be seen, season pass advance revenue averages between \$4m to \$7.8m and is less during a Life Pass capital raise campaign.

**Table 10: Historical advance season pass revenue and Life Pass Capital Raises (Note figures include GST)**

RAL cash flow analysis and trends	November reporting date				April reporting date	
	FY21 \$'000s	FY20 \$'000s	FY19 \$'000s	**Nov-18 (7 months)	*FY18 \$'000s	*FY17 \$'000s
<b>Operating activities</b>						
<b>Cash received:</b>						
Receipts from customers		16,976	21,587	26,273	25,268	22,507
Revenue received in advance		5,905	6,423	6,546	7,761	7,281
Receipts from life pass sales		215	253	4,419	197	368
						13,181

## New Life Pass Sale Assumptions

In 2028 a Life Pass capital raise may be required to repay the Bondholders upon maturity. \$10.48m is raised by selling 1,600 life passes. Historical sales data in table 13 below suggests that selling 1,600 Life Passes in 2028 and raising \$10.48m is not unreasonable. The PwC Voluntary administration survey in November 2022 identified \$9m in potential new life pass sales across 1,612 responses.

**Table 11: PwC Voluntary Administration Survey**

Funding category	Positive responses	Potential value
Transfer of an existing Life Pass to new entity (\$2,500)	2,937	\$7.3m
Interested in purchasing a new Life Pass (\$5,750)	1,612	\$9.3m
Interested in paying to transfer an existing Life Pass to a family member (\$3,000)	333	\$1.0m
Purchase of a 5-year Season Pass (\$2,000)	4,912	\$7.4m
Intention to make a donation (various amounts)	4,989	\$0.9m
<b>Total</b>		<b>\$25.9m</b>

**Table 12: Life Pass Sale Assumption**

New Life Pass Sale	Price today	Price five years time @ 3% CPI	Assume Life Pass is valued at 10 seasons	Qty sold	Life Pass Capital raise including GST	Life Pass Capital raise excluding GST
Season Pass Price GST inclusive	\$ 650	\$ 754	\$ 7,535	1,600	\$ 12,056,450	\$ 10,483,870

**Table 13: Historical Life Pass Capital raises**

Year	Life Pass and 5 year pass funding raised	Life Passes and 5 year Passes sold (approximate)	Purpose/Project
2000	\$ 6,000,000	2,700	Purchase Turoa
2006	\$ 12,900,000	3,700	Turoa upgrades Highnoon Express, Apline café, snow making
2006	\$ 3,300,000	2,500	Turoa upgrades- 5 year plus pass
2012	\$ 2,300,000	1,000	5 year passes converting to Life pass users
2007 to 2010	\$ 1,900,000	400	Sold upon request?
2013-2014	\$ 300,000	100	Sold upon request
2016	\$ 14,100,000	4,100	Whakapapa redevelopment program
2019	\$ 4,800,000	1,000	Turoa upgrade program
<b>Total 2000 to 2019</b>	<b>\$ 45,600,000</b>	<b>15,500</b>	

Life Pass capital raises have financed \$45.6m in capital infrastructure upgrades since the year 2000. Life Pass Financing is cost effective and low risk compared to debt and equity forms of financing as seen in table 14 on the following page.



**Table 14: Life Pass financing versus Debt and Equity financing**

	Life Pass	Private Investment	Debt
<b>Cost of capital</b>	3%-5%	10% minimum	0% - *8.95%
<b>Risk</b>	Low	Medium to Extremely High	Medium to Extremely High
<b>Principal repayments</b>	No	No	Yes
<b>Dividends paid</b>	No	Yes	No
<b>Interest and financing servicing costs</b>	No	No	Yes
<b>Future revenue foregone</b>	No, you get the Life Pass holders revenue upfront	No	No
<b>Promotes future revenue growth</b>	Yes, Life Pass Holders are pipe line revenue feeders. They are passionate about the Mountain and introduce friends and family to skiing on Mt Ruapehu	No - source of capital only	No - source of financing only
<b>Financial Stability risk</b>	Low	Extremely high	Extremely high
<b>Ability to access additional capital</b>	Yes, can issue new Life Pass campaigns over time. Every 5 years a new generation of fee paying skiers are available to replace ageing Life Pass Holders	Limited, depends on how deep the private equity investors pockets are and whether they believe they will receive a return on investment	Limited by the profitability of the company to service the debt

## Bondholder Assumptions

It has been assumed that the Bondholders will retain their existing terms and conditions. The coupon payments for FY25 to FY32 have been extracted from the 2.12 RAL Long Term Financial Model. In FY29 we adjusted the coupon payment to reflect \$4m of capital invested due to the maturing of \$9.5m of bonds in FY28.

**Table 15: Bondholder Coupon Payments and Principal repayments**

Bondholder Assumptions	FY23	FY24	FY25	FY26	FY27	FY28	FY29
Coupon payments	-\$ 419,708	-\$ 918,690	-\$ 1,181,116	-\$ 1,233,406	-\$ 1,377,205	-\$ 1,556,953	-\$ 527,893
Principal repayments						-\$ 9,500,000	-\$ 4,000,000

## Debt Assumptions

PwC volunteer administration fees and associated legal costs outstanding are estimates at \$1.2m. PwC and their legal advisors will expect to be paid at the conclusion of the voluntary administration and will have a preferential claim.

RAL Trade and minor creditors totaling \$1.955m will be paid over five years.

Employees are owed \$124k in outstanding entitlements. It is expected this will be repaid in FY23.

Other restructuring of costs of \$250k has been budgeted to be spent managing the DOCA process in FY23.

**Table 16: Other assumptions**

	FY23	FY24	FY25	FY26	FY27
PwC Voluntary Administration outstanding fees and legal costs	\$ 1,200,000				
Other restructuring costs	\$ 250,000				
Employees	\$ 124,105				
RAL Trade and Minor Creditors	\$ 391,161	\$ 391,161	\$ 391,161	\$ 391,161	\$ 391,161

The cash rate on surplus cash is a conservative 1% to reflect the working capital nature of the cash held.

**Table 17: ANZ, MBIE, and RDC Debt repayment assumptions**

	FY23	FY24	FY25	FY26	FY27	FY28	FY29	FY30	FY31	FY32	Total
Repayment of ANZ VA loan	-\$ 250,000	-\$ 250,000	-\$ 62,500	-\$ 62,500	-\$ 62,500	-\$ 62,500	-\$ 62,500	-\$ 62,500	-\$ 62,500	-\$ 62,500	-\$ 1,000,000
Repayment of MBIE VA loan	-\$ 250,000	-\$ 250,000	-\$ 250,000	-\$ 250,000	-\$ 250,000	-\$ 250,000	-\$ 250,000	-\$ 1,250,000	-\$ 1,250,000	-\$ 1,250,000	-\$ 5,500,000
Repayment of MBIE pre-VA loan											Debt forgiven
Repayment of ANZ pre-VA loan											Debt forgiven
Repayment of RDC										-\$ 500,000	-\$ 500,000

Post-VA ANZ debt is paid between FY23 and FY32. No interest is payable on outstanding debt balances. Pre-VA debt of \$12.7m is forgiven.

Post-VA MBIE debt is paid between FY23 to FY32. No interest is payable on outstanding debt balances. \$15m pre-VA debt is forgiven.

RDC debt is repaid back in full, but maturity of payment is pushed back to FY32.

# Crowdfunding Strategies

## Equity Crowdfunding

**Mechanics:** Equity crowdfunding rules allow a maximum of up to \$2m to be raised in any 12 month period from retail investors (through a licensed ECF platform). Most platforms also allow for a simultaneous sidecar offering to wholesale investors. Meaning that any given capital raise can exceed \$2m (if some larger investors are eligible as wholesale investors). We have discussed ECF representation with licensed platform Snowball Effect (regarding the proposed capital raises) and allowing secondary transactions through Unlisted Market.

**Preparation:** ECF campaigns require an Information Memorandum. This is a formal disclosure document that is smaller in scope than a full Product Disclosure Statement (used for an IPO). Snowball Effect provide an Information Memorandum preparation service and the Company will work with Snowball Effect to prepare offer materials for each of the proposed capital raising windows.

**Investor Demand:** The most important part of any public capital raise is to evaluate investor demand and actively work to promote the offering. To this end, it is common to conduct a 'testing the waters' campaign or series of investment surveys. The survey process serves two purposes, empirically assessing existing investor demand and raising awareness of the offering. The various surveys conducted by PwC, MBIE and RSSA so far have validated the presence of significant interest from life-pass holders and the wider mountain community in making an equity investment to become co-owners of the business that operates the skifields.

*Table 18 Estimated Investor contribution by timing (Year 1 vs Year 2 to 5)*

	Investor Count	Expressed Amount	Average	Mode
<b>Year 1 Capital Raise</b>	2,207	\$6,199,175	\$2,809	\$1,000
<b>Years 2 to 5 Capital Raises</b>	1,368	\$6,980,999	\$5,103	\$5,000
<b>Total Investor Demand</b>	<b>2,287</b>	<b>\$13,180,174</b>	<b>\$5,763</b>	<b>\$1,000</b>

**Investor composition:** Different size investors require different marketing strategies. For example, smaller investors can be reached through social media advertising and email databases. Medium investors are better engaged through investor webinars and in-person roadshows or hosted events. Large investors often require one-on-one meetings with the company's senior management team.

*Table 19: Estimated Investor contribution profile by investment value*

Investment contribution ranges	Investor Composition (by count)	Investor Composition (by total amount)
Less than \$1k	689	\$116,113
\$1k - \$5k	1,868	2,336,674
\$5k - \$50k	991	\$8,319,887
\$50k +	27	\$2,407,500
<b>Total</b>	<b>2,287</b>	<b>\$13,180,174</b>

**Feasibility:** Our analysis suggests that raising \$10m over 5 years from approximately 2,000 investors is a realistic plan based on latent investor demand and potential marketing reach. Although, for scale, the marketing effort to achieve these capital raises are likely to be comparable to any normal product marketing campaign (covering paid, owned and earned media) required to sell \$10m worth of commercial product or services. We have planned for a series of annual \$2m raises spread over 5 years to build momentum, spread demand-risk (e.g. investors constrained by recession), load-balance marketing efforts, manage dilution from new share issues, and to build credibility through a (hopefully) escalating share-price (based on Net Asset Value backing).

**Investor Demographics:** The various parts of the ski community have expressed interest in purchasing shares in the skifields. Life Pass Holders are obviously highly aligned with the success of the company. What is interesting is the significant investment appetite from other groups.

*Table 20: Investor demand by stakeholder type*

	Count	Sum	Average	Mode
<b>Life Pass Holders</b>	1,392	\$6,345,870	\$4,559	\$1,000
<b>Season Pass Holders</b>	784	\$6,096,450	\$7,776	\$2,000
<b>Day Pass Skiers</b>	344	\$2,673,012	\$7,770	\$2,000
<b>Sightseeing Pass Buyers</b>	21	\$110,700	\$5,271	\$500

**Comparable campaigns:** The skifields may represent a large series of capital raises compared to recent New Zealand ECF campaigns. Nevertheless, we can learn from other campaign about marketing best practises, average individual investment sizes, and the importance of ongoing quality investor relations.

**Table 21: Crowdfunding Equity Raising Case Studies**

Company	Relevance to raise	Number of investors	Total raised
Reefton Distilling	Local community focus. Non-dividend paying, long-term capital appreciation focused.	500	\$3.3m +
Behemoth Brewing	Multiple raises on Snowball Effect and PledgeMe.	635 +	\$5m +
Invivo Wines	Raised multiple rounds across multiple years. Marketing led approach.	687	\$4.4m
Otago Chocolate Company OCHO	Local employment focus. Community orientated.	3,549	\$2m
Karma Cola	Sustainability focus. Primarily wholesale investors.	(Private raise)	\$4m

## Revenue: Multi-Season Product Pre-Sales

The PwC Voluntary Administration conducted a survey to RAL's 100,000 customer database. This survey identified the following:

**Table: PwC Product Crowdfunding Survey November 2022**

<b>Funding Category</b>	<b>Positive responses</b>	<b>Potential value</b>
Interested in purchasing a new Life Pass (\$5,750)	1,612	\$9.3m
Interested in paying to transfer an existing Life Pass to a family member (\$3,000)	333	\$1.0m
Purchase of a 5 year Season Pass (\$2,000)	4,912	\$7.4m

The pre-sale of long-term products such as new life passes, five-year season passes and premium parking passes can provide an additional mechanism to bring cashflow forwards and match the cash needs of the business to customer demand. These products rely on customer trust which can be enhanced through the transparency, accountability and good governance of the re-capitalised community-owned operation.

## BUSINESS

# Ruapehu bidder says fields don't make financial sense

*Ngāti Tūwharetoa has taken its offer off the table and will take legal action if the sale isn't halted*



by **Andrew Bevin**

11/09/2023



The future of Turoa and Whakapapa has been up in the air since October 2022. Photo: Mt Ruapehu

Due diligence work on the financial viability of Ruapehu Alpine Lifts has caused local iwi to withdraw their bid, saying the business case doesn't stack up as is.

Concerns about the future of the ski fields were detailed in a letter sent by Ngāti Tūwharetoa Trust chief executive Nigel Chee to the head of Māori Crown Relations agency Te Arawhiti.

“We have undertaken commercial and legal due diligence with the support of KPMG and Bell Gully which has demonstrated that the ability for any operator to continue operating the ski fields requires a significant increase and expansion of operations for there to be commercial viability.”

### READ MORE:

- \* [Ruapehu sale: Conservation concessions sign-off is the great unknown](#)
- \* [Ruapehu administrators deny iwi relations blame](#)
- \* [Iwi joins bidding war for Ruapehu](#)

Chee said an expansion was incompatible with Ngāti Tūwharetoa's values and ethos, and the due diligence also concluded that Ngāti Tūwharetoa didn't have the risk appetite to lead a commercial proposal.

“Our investigations highlighted that there are key unknowns which mean that exposing iwi capital to a ski field without the Crown as a partner would be imprudent.”

Chee said Ngāti Tūwharetoa’s work with KPMG and Bell Gully had also highlighted it couldn’t consider the sale and purchase without considering the [Department of Conservation concession licence](#) and the settlement negotiations still to be undertaken for the Tongariro National Park.

According to the Tongariro National Park Plan, which has to be followed by the Conservation Minister in making any decision, tāngata whenua must be robustly consulted.

Chee said the process did not honour agreements outlined in its 2018 Treaty of Waitangi settlement and prejudiced its negotiations concerning the national park settlement.

Ultimately, the iwi’s process found it did not support the progression of the sale of the Ruapehu Alpine Lift assets.

“While the Crown may choose to pursue the track it has to date, we would prefer the Crown work with us to develop an acceptable transition plan that would operate until the successful conclusion of the Tongariro National Park settlement negotiations.”

The threat of legal proceedings to stay any sale was also brought up. “If our non-legal options are exhausted we will seek a comprehensive, evidence-based discovery process to identify and quantify the impact of the Crown’s preferred solution(s).”

The discovery process would be targeted at assessing long-term sustainability, examining commercial bidder and bid evaluation matters that may impact on its Deed of Settlement, concession license and restoration options for the maunga.

## Sales process

Ngāti Tūwharetoa’s interest in purchasing Turoa and Whakapapa went public [late in the sale process](#), with claims its interest in purchasing the assets hadn’t been adequately progressed.

The revelation [spelled trouble for MBIE and administrators/liquidators PWC](#), and though the exact nature of why Ngāti Tūwharetoa’s interest wasn’t progressed is up for dispute, the Government has acknowledged that iwi engagement hadn’t been good enough.

The letter was signed by the then Regional Development Minister Kiritapu Allan, Treaty Negotiation Minister Andrew Little and Conservation Minister Willow-Jean Prime.

Though the company had been in voluntary administration since October, local iwi and hapū only had their first meeting with the regional development minister less than two weeks before the failed vote to approve sales options in June.



UPDATED

# Buyer for insolvent Ruapehu Alpine Lifts' main skifield walks away

By [Kate MacNamara](#)

8 Feb, 2024 05:00 AM ⌚ 7 mins to read

The Crown's preferred bidder for the [insolvent Whakapapa skifield](#) has walked away from negotiations, throwing the future of skiing in the North Island, and tourism in the central region, into further doubt.

"It's a dead bid... there's inadequate [Crown] funding," Tom Elworthy told the *Herald*.

He said a combination of factors now make a commercial business case for the operation impossible: the untenably short licence to operate the ski field on offer by the Department of Conservation (DoC) - the skifield is in the Tongariro National Park - and a "fiscal cut" to the Crown's commitment to the bid, a change since the election of the new Government in October.

Any new operator of the skifields is required to seek a fresh operating concession from DoC; the department offered Elworthy's group a 10-year concession, however its terms are subject to review in five years. The timeframe is a drastic reduction from the status quo.

"We're on the sidelines, definitely... no sane person is going to take on a business with a looming \$15m debt [repayment], deferred maintenance and the other risks, and a very short concession," Elworthy said.

Last year, Elworthy and partners from the Christchurch-based private equity firm The South Island Office were the government's [preferred bidder](#), through Whakapapa Holdings Ltd, for assets of the Whakapapa skifield on Mt Ruapehu, the largest of the two fields operated by Ruapehu Alpine Lifts (RAL), now in receivership.

The skifield now appears to face a funding crunch next month. Without further taxpayer money to help it prepare for the ski season and to hire staff, it's not clear that Whakapapa can operate this winter.

For the last 16 months insolvent, not-for-profit operator RAL [has been kept afloat with \\$20m of taxpayer money](#), none of which is expected to be repaid. The last round of funding

was approved by the Labour Government in early October. At the time, \$4.3m was earmarked to keep RAL operations afloat until March 2024 (and \$3m was earmarked for Crown commitments to a separate bid for the Tūroa skifield).

The previous Government claimed that the importance of the skifields to the economy of the central North Island, and particularly to the local tourism sector, justified the hefty expense. The new National-led coalition Government may be altering course.

The Ministry of Business, Innovation and Employment (MBIE), the government agency driving the process to sell RAL's assets, said in a statement: "Commercial arrangements for the Whakapapa skifields are under active consideration. MBIE cannot comment any further on this process."

Finance Minister Nicola Willis' office directed questions on the matter to Minister for Regional Development Shane Jones. Jones provided no comment on the matter, beyond that offered by MBIE.

The Crown is RAL's biggest creditor and largely controls its fate. However, three iwi have interests in the Tongariro National Park and among these, Ngāti Tūwharetoa, in particular, opposes the commercial sale of the skifields.

Iwi interests in the two ski areas differ. Ngāti Tūwharetoa's interests are centred on the Whakapapa field on northern side of Mt Ruapehu, while Ngāti Rangī and Uenuku interests centre on areas including the Tūroa skifield on the mountain's southwest slopes.

DoC is required to meaningfully consult iwi on the matter of the skifields' concessions.

### **Treaty settlement in Tongariro National Park**

Ngāti Tūwharetoa is connected to the Whakapapa skifield through its traditional rohe (territory), and additionally through bond holdings totalling \$9.5m which give it security over the field's gondola - the \$25m gondola was built in 2018 and it was also funded with an ill-fated \$10m loan from the Crown's Provincial Growth Fund.

A bid on behalf of Ngāti Tūwharetoa for all or part of RAL was expected in 2023, but in October the iwi advised ministers of a change of heart: it now opposes the commercial tender process.

A November briefing by officials to the new Minister of Conservation, Tama Potaka, noted: "Ngāti Tūwharetoa wrote to ministers and officials [in 2023] to advise that they would not bid for RAL's assets, do not support a private commercial tender for the purchase of RAL and would prefer to work with the Crown to develop an acceptable transition plan that would operate until the successful conclusion of the Tongariro National Park settlement negotiations."

The iwi's treaty 2018 settlement requires the Crown to negotiate terms of "cultural redress" over the Tongariro National Park. This process is also expected to include other iwi and

hapū with interests in the park. Negotiations started last year after a long delay and are likely to take at least several years.

“Given some of the positions expressed by iwi regarding a commercial operation on Mt Ruapehu, there is a risk of a prolonged concession process, legal challenges and additional costs to the Crown to keep running the skifields prior to the completion of any transaction,” officials warned.

In 2023, the previous Government acknowledged considerable deficiencies in officials’ consultation and engagement with iwi on the matter of the RAL insolvency.

### **Pure Tūroa bid moving ahead**

Separately, the sale of RAL’s Tūroa skifield to Pure Tūroa Ltd is slowly moving ahead - the company is jointly owned by businessmen Greg Hickman of Ōhakune and Cameron Robertson of Taupō. The purchase price is \$1; the terms commit both the buyer and the Crown to further investment in the company.

After considerable delay, Pure Tūroa signed a conditional agreement to buy the skifield at the beginning of the month, but completion is contingent on the issuance of a new operating licence by DoC.

Public hearings on Pure Tūroa’s licence application are expected later this month. If executed, the deal requires a Crown investment of at least \$3m in the company, and it would take a 25 per cent equity stake.

Pure Tūroa is seeking a licence to operate the Tūroa ski field for a 10-year term, with a review after three years. It would also have rights to a 20-year extension, with further reviews every five years.

### **Sticking points for Whakapapa Holdings**

Elworthy said his company would need a much longer licence term to make a viable, commercial investment in the Whakapapa skifield.

A 10-year licence, reviewable at five years, would be a remarkable departure: RAL’s current licence to operate the Whakapapa skifield runs for 30 years (2017 to 2046). It also contains considerable rights of extension from 2046.

Elworthy also noted the requirement to assume more than \$14m in secured “gondola bonds”, which come due in 2026. Elworthy said the debt is structured as “equipment bonds” and the bondholders have security over the physical gondola.

He said earlier iterations of the deal between WHL and the Crown made some “provision” for these costs, “but that’s changed”.

### **Mounting Crown costs**

Crown costs sunk into the failing RAL operations, or anticipated against it, now top \$100m. The lion's share is made up of a \$47m to \$88m contingent liability for the clean-up of infrastructure on the mountain in the event of the ski fields' closure. The liability, which previously sat with RAL, appears to have been assumed by DoC.

In addition, the Provincial Growth Fund, also under the direction of Shane Jones as the former Regional Development Minister in the Labour-led coalition Government of 2017, lent \$15m to RAL in 2018 and in 2020. This is expected to be written off entirely.

Further government funding of \$20m has floated skifield operations since October 2022.

**Kate MacNamara is a South Island-based journalist with a focus on policy, public spending and investigations. She spent a decade at the Canadian Broadcasting Corporation before moving to New Zealand. She joined the *Herald* in 2020.**

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## A. Permission Application Number and Name of Applicant SUB 206

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Jacqueline de Heer
Organisation	
Date	08.02.2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

All parts. I **support** the granting of concessions to Pure Turoa Ltd.

My reasons for my objection or submission are:

I **support** the granting of concessions to Pure Turoa Ltd because:

- We have strong personal and family connections to the mountains of Tongariro National Park going back to the late 1960s, and we enjoy skiing/snowboarding, tramping and mountaineering as forms of recreation together with our family and many of our friends. We are regular and respectful visitors to TNP and being there is one of our favourite things to do.
- As noted on p35 of the Tongariro National Park Management Plan (2006) Mt Ruapehu is 'nationally important' for skiing as it is the only place in the North Island where lift-serviced alpine snowsports can be provided (notwithstanding a small club field at Taranaki). Given the failure of Ruapehu Alpine Lifts, it is important to ensure that another entity takes over immediately. Snow sports account for about half of all TNP visitors according to the TNPMP.
- The proposal is within the amenity area of Turoa Ski Area identified in the TNPMP and is generally consistent with the TNPMP's objectives.
- Granting the concession would **foster recreation** and therefore be consistent with section 6(e) of the Conservation Act, which states:  
*"to the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism."*
- While there are reasons to consider delaying the granting of concessions until after Te Tiriti o Waitangi claims have been settled, I believe that the applicant's growing relationship with Ngāti Rangī and others, combined with the relatively short term sought (compared with the current RAL concession's 60 years) and the proposal to eventually remove and replace the Ngā Wai Heke, Park Lane, Wintergarden and Giant lifts with one gondola or high capacity chair with a mid-station, plus the fact that the infrastructure will be damaged by ice if not operated each winter, mean granting the concession now and then working with iwi collaboratively is the best approach.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I submit that the Department of Conservation:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area

2. Consider how the term of the concession can be extended to provide sufficient time for payback of the capital investment required to remove and replace some of the lifts as shown in the indicative development plan, while also respecting and providing for collaboration with Ngāti Rangi and any other relevant iwi so that the outcomes of their treaty settlement can be recognised and provided for by the applicant and DOC when the time comes.
3. Note that climate change will potentially render commercial ski areas on Mt Ruapehu economically unviable at some point during this century if the 2,300m elevation remains the upper limit for development, so allowing lift development in the 1,900m – 2,300m zone within the current ski area boundary may be desirable to ensure that popular and rewarding lift-serviced alpine snow sports can continue on the maunga for as long as possible.

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

### How do I submit my objection or submission?

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



## A. Permission Application Number and Name of Applicant **SUB 207**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Edward Norman
Organisation	-
Date	8 February 2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

The application as a whole.

My reasons for my objection or submission are:

I support the application of Pure Turoa Limited for its Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years (including associated aircraft and filming activities).

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

---

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

**How do I submit my objection or submission?**

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



## A. Permission Application Number and Name of Applicant SUB 208

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Samuel William Mayston
Organisation	Self
Date	8 Feb 2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Objection to an individual company doing the following:

- Taking profit from a National Park.
- Not offering any lifeline to current Lifepassholders, who have built the Mountain. These should be honoured and reactivated to continue use.
- Not providing any transparency in directors, operations etc.
- Removing and down-scaling the mountain facilities.
- Not seeking longer commitment to continue operations on the mountain, they will just suck all funds out and can then walk away.

And also an objection to MBIE and the Government not listening to RSSA, not consulting with VA Committee on what their options were to keep RAL going, not offering to forgive debt but doing so for a private company.

My reasons for my objection or submission are:

It is unfair for an individual company to take profit from a National Park and for facilities that they have purchased for only \$1 and with no future support of life passholder.

If Government did not have 2-years of Lockdowns to prevent Aucklanders from skiing and paying off debt on new gondola then we would not be here. And if they forgave debt to RSSA and sought a DOCA arrangement then we could continue making profit. To have an individual company removing lifts and taking profit is not right.

Mountain clubs have been built by many many hours of community spirit and this works for a non-profit organisation such as RAL. Everything is for the good of the community. With a private company this will never be the same and all clubs will start to die a slow death. This really is a sad state of affairs.

RSSA has been formed by so many smart and experiences individuals who care very very much about the mountain. These people have all been giving so many hours of volunteer time to analyse the Mountain and the \$ to come up with solutions that are unheard and not supported by Government. Please just listen to the RSSA and hear what they have to say. With these smart people we can still do great things for the Mountain.

Please please please just keep the Mountain owned by everyone. There are a lot of very passionate people out there that will keep this mountain going. We have had some unfortunate times and the Government lockdowns have not made it easy. This can be saved if you just give it a chance.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Reject this concession for a private company to profit from a National Park and from facilities that were built by Shareholder donations and from purchase of Life Passes.

Save the National Park – any facilities running ski-fields should always be a community non-profit organisation to send any funds back into the Mountain. Not away from it.

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## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
None		

### How do I submit my objection or submission?

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.

**A. Permission Application Number and Name of Applicant** **SUB 209**

Pure Tūroa Limited 109883-SKI

**B. Name of Proposed Activity and Location(s)**

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

**C.2 Your name**

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Matt Vella
Organisation	
Date	8/02/24

**D. Statement of Support, Neutrality or Opposition**

- Yes** – I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

**E. Hearing Request**

- No** – I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

My reasons for my objection or submission are:

The outcomes that need to be addressed by this application are:  
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

---

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

### How do I submit my objection or submission?

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.





## A. Permission Application Number and Name of Applicant **SUB 210**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Wei Lu
Organisation	
Date	08 Feb 2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing



## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. The duration of the concession is only 10 years.
2. The Tongariro National Park (TNP) treaty claim(s) have not been negotiated or settled.
3. Not enough information to know if Pure Tūroa Limited (PTL) will be financially sound.
4. The decreased access to the mountain if the concession is awarded.
5. The concession excludes wider alpine snow sports assets on Mt Ruapehu, specifically Whakapapa.
6. Compressed negotiation and consultation period.
7. Redaction of important information, including parties involved and consulted.

My reasons for my objection or submission are:

1. There currently remains an existing concession on the site of 60 years.

The short length of the concession sought indicates a clear lack of a long-term commitment to the operation, to the wider area and opens the door for asset stripping and an imbalance between commercial priorities and public interest. Environmentally, the longer the commitment to a place, the more invested a party is in the sustainability of a place. The PTL concession falls short on this front.

2. Tongariro National Park (TNP) treaty claim(s) may lead to immediate litigation costs.

The well publicised interests of other parties (including those under a Treaty claim) in the existing concession and RAL assets mean that should this PTL concession be awarded at this time, there is high risk of conflict and subsequent litigation which will bleed resources which could otherwise be used to enable and ensure equitable access to the assets and the ski field.

3. It is difficult to tell if the business will be financially viable.

Appendix 7 cash flow model makes it difficult to tell if the business makes commercial sense.

Information provided excludes information on what DoC and MBIE will need to pay to remove infrastructure from the mountain if the business fails.

4. Increased costs and decreased mountain capacity will make Tūroa less accessible to New Zealanders.

The reduction in capacity with the removal of the Nga Wai Heke chair, Giant Chair, and the Wintergarden Platter and less operational days, longer inactive vs active time on the mountain and lowered accessibility to the Maunga during the operating season. The lower capacity of 4500 would see increased demand, leading to price increases which will take the cost of utilising this natural resource beyond the reach of most New Zealanders.

5. Competing business interests with Whakapapa and lack of complementary business operation.

A lack of synergy between the other snow sports assets on Mt Ruapehu lowers the chance of mitigating partial operational closure across the Maunga – further reducing access for those who have travelled some distance to stay and experience the thrill and majesty of Mt Ruapehu.

6. Past concessions negotiations took around four years.

The short period of time between the consultation period and opening of the 2024 season means that there cannot be full consideration of important aspects.

7. Key information has not been provided.

The extensive redaction of names (e.g. Directors of PTL), this information is a matter of public record and should not be redacted.

The outcomes that need to be addressed by this application are:  
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Any concession needs to be for a longer period of time (minimum 30 years).  
Any concession needs to show partnership and/or endorsement from mana whenua. Cease ignoring iwi and retract from seeking new concessions, as they have said they will not approve new concessions until Treaty claims are settled on the Maunga.  
Keeping the existing RAL concession in place provides a safe working relationship while the TNP treaty claims are being negotiated between the Government and various iwi interests over coming years.  
Any concession should be for the whole mountain, being Whakapapa and Tūroa.  
Any concession needs to show active consideration of ongoing accessibility (including socio-economic) to the Operation within this National Park. Especially as a non-profit operator is seen as being more compatible with public access to a National Park environment.

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

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## A. Permission Application Number and Name of Applicant SUB 211

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Nicholas Sanderson
Organisation	Individual
Date	8 <sup>th</sup> Feb 2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. The duration of the concession is only 10 years.
2. The Tongariro National Park (TNP) treaty claim(s) have not been negotiated or settled.
3. Not enough information to know if Pure Tūroa Limited (PTL) will be financially sound.
4. The decreased access to the mountain if the concession is awarded.
5. The concession excludes wider alpine snow sports assets on Mt Ruapehu, specifically Whakapapa.
6. Compressed negotiation and consultation period.
7. Redaction of important information, including parties involved and consulted.

My reasons for my objection or submission are:

1. There currently remains an existing concession on the site of 60 years.

The short length of the concession sought indicates a clear lack of a long-term commitment to the operation, to the wider area and opens the door for asset stripping and an imbalance between commercial priorities and public interest. Environmentally, the longer the commitment to a place, the more invested a party is in the sustainability of a place. The PTL concession falls short on this front.

2. Tongariro National Park (TNP) treaty claim(s) may lead to immediate litigation costs.

The well publicised interests of other parties (including those under a Treaty claim) in the existing concession and RAL assets mean that should this PTL concession be awarded at this time, there is high risk of conflict and subsequent litigation which will bleed resources which could otherwise be used to enable and ensure equitable access to the assets and the ski field.

3. It is difficult to tell if the business will be financially viable.

Appendix 7 cash flow model makes it difficult to tell if the business makes commercial sense.

Information provided excludes information on what DoC and MBIE will need to pay to remove infrastructure from the mountain if the business fails.

4. Increased costs and decreased mountain capacity will make Tūroa less accessible to New Zealanders.

The reduction in capacity with the removal of the Nga Wai Heke chair, Giant Chair, and the Wintergarden Platter and less operational days, longer inactive vs active time on the mountain and lowered accessibility to the Maunga during the operating season. The lower capacity of 4500 would see increased demand, leading to price increases which will take the cost of utilising this natural resource beyond the reach of most New Zealanders.

5. Competing business interests with Whakapapa and lack of complementary business operation.

A lack of synergy between the other snow sports assets on Mt Ruapehu lowers the chance of mitigating partial operational closure across the Maunga – further reducing access for those who have travelled some distance to stay and experience the thrill and majesty of Mt Ruapehu.

6. Past concessions negotiations took around four years.

The short period of time between the consultation period and opening of the 2024 season means that there cannot be full consideration of important aspects.

7. Key information has not been provided.

The extensive redaction of names (e.g. Directors of PTL), this information is a matter of public record and should not be redacted.

Iwi engagement has been completely redacted.

The outcomes that need to be addressed by this application are:  
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Any concession needs to be for a longer period of time (minimum 30 years).

Any concession needs to show partnership and/or endorsement from mana whenua. Cease ignoring iwi and retract from seeking new concessions, as they have said they will not approve new concessions until Treaty claims are settled on the Maunga.

Keeping the existing RAL concession in place provides a safe working relationship while the TNP treaty claims are being negotiated between the Government and various iwi interests over coming years.

Any concession should be for the whole mountain, being Whakapapa and Tūroa.

Any concession needs to show active consideration of ongoing accessibility (including socio-economic) to the Operation within this National Park. Especially as a non-profit operator is seen as being more compatible with public access to a National Park environment.

## G. Attachments

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### How do I submit my objection or submission?

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## A. Permission Application Number and Name of Applicant SUB 212

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Anthony Robert Bowen
Organisation	
Date	07 February 2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

I support the full application made by Pure Turoa Ltd

My reasons for my objection or submission are:

I am a keen skier and interested in the continuation of skiing and snow sports on Mt Ruapehu. I believe the continuation of skiing on Mt Ruapehu will benefit people in the local district by supporting employment and the local businesses.  
Without the ski field operating there will be a considerable economic loss to the Ruapehu District and the people who have made this area their home.

The outcomes that need to be addressed by this application are:  
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I fully support the application being fully approved.

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## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

### How do I submit my objection or submission?

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



## A. Permission Application Number and Name of Applicant **SUB 213**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised  
on behalf of submitter

Organisation

Date

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

My reasons for my objection or submission are:

The outcomes that need to be addressed by this application are:  
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

---

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

### How do I submit my objection or submission?

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



## A. Permission Application Number and Name of Applicant **SUB 214**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Sopaep "Khom" Yin
Organisation	
Date	07/02/2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

All parts of the application. I hereby **support** the granting of concessions to Pure Turoa Limited.

My reasons for my objection or submission are:

I **support** the granting of concessions to Pure Turoa Ltd because:

- I have had strong connections, both personal and family like to the mountains of Tongariro National Park since my first time snowboarding on the skifields of Turoa in 2011 to the point I began my first winter season the very next year in 2012, I consider it my home mountain, a special place where I live and work every year or two.
- The development for the alpine meadow will be a great solution, this will aid in beginners wanting to continue to progress during the harsh weather the maunga can bring.
- The removal of the giant and Nga wai heke definitely a must

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I submit that the Department of Conservation:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area
2. Consider how the term of lease can be extended to provide an extended or sufficient amount of time for the removal or replacements of the chairlifts indicated in the plan to allow for the repayment of capital used for the upgrades.
3. Should weather become more unpredictable, there needs to be some form of way where chairlifts can be easily movable or viable to be used for all year round, a way in which the ski station can be usable while also remaining as ecological or environmentally friendly as possible to the national park.
4. Parking has always been a problem for both sides of the mountain, Whakapapa and Turoa. There would need thought put into how to transportation works on and off the mountain in a more ecological way that benefits the national park more than the consumers.

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## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

**How do I submit my objection or submission?**

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## A. Permission Application Number and Name of Applicant SUB 215

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Jan Knoester
Organisation	
Date	08/02/2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. The duration of the concession is only 10 years.
2. The Tongariro National Park (TNP) treaty claim(s) have not been negotiated or settled.
3. Not enough information to know if Pure Tūroa Limited (PTL) will be financially sound.
4. The decreased access to the mountain if the concession is awarded.
5. The concession excludes wider alpine snow sports assets on Mt Ruapehu, specifically Whakapapa.
6. Compressed negotiation and consultation period.
7. Redaction of important information, including parties involved and consulted.

My reasons for my objection or submission are:

1. There currently remains an existing concession on the site of 60 years.

The short length of the concession sought indicates a clear lack of a long-term commitment to the operation, to the wider area and opens the door for asset stripping and an imbalance between commercial priorities and public interest. Environmentally, the longer the commitment to a place, the more invested a party is in the sustainability of a place. The PTL concession falls short on this front.

2. Tongariro National Park (TNP) treaty claim(s) may lead to immediate litigation costs.

The well publicised interests of other parties (including those under a Treaty claim) in the existing concession and RAL assets mean that should this PTL concession be awarded at this time, there is high risk of conflict and subsequent litigation which will bleed resources which could otherwise be used to enable and ensure equitable access to the assets and the ski field.

3. It is difficult to tell if the business will be financially viable.

Appendix 7 cash flow model makes it difficult to tell if the business makes commercial sense.

Information provided excludes information on what DoC and MBIE will need to pay to remove infrastructure from the mountain if the business fails.

4. Increased costs and decreased mountain capacity will make Tūroa less accessible to New Zealanders.

The reduction in capacity with the removal of the Nga Wai Heke chair, Giant Chair, and the Wintergarden Platter and less operational days, longer inactive vs active time on the mountain and lowered accessibility to the Maunga during the operating season. The lower capacity of 4500 would see increased demand, leading to price increases which will take the cost of utilising this natural resource beyond the reach of most New Zealanders.

5. Competing business interests with Whakapapa and lack of complementary business operation.

A lack of synergy between the other snow sports assets on Mt Ruapehu lowers the chance of mitigating partial operational closure across the Maunga – further reducing access for those who have travelled some distance to stay and experience the thrill and majesty of Mt Ruapehu.

6. Past concessions negotiations took around four years.

The short period of time between the consultation period and opening of the 2024 season means that there cannot be full consideration of important aspects.

7. Key information has not been provided.

The extensive redaction of names (e.g. Directors of PTL), this information is a matter of public record and should not be redacted.

Iwi engagement has been completely redacted.

The outcomes that need to be addressed by this application are:  
 Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Any concession needs to be for a longer period of time (minimum 30 years).

Any concession needs to show partnership and/or endorsement from mana whenua. Cease ignoring iwi and retract from seeking new concessions, as they have said they will not approve new concessions until Treaty claims are settled on the Maunga.

Keeping the existing RAL concession in place provides a safe working relationship while the TNP treaty claims are being negotiated between the Government and various iwi interests over coming years.

Any concession should be for the whole mountain, being Whakapapa and Tūroa.

Any concession needs to show active consideration of ongoing accessibility (including socio-economic) to the Operation within this National Park. Especially as a non-profit operator is seen as being more compatible with public access to a National Park environment.

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

### How do I submit my objection or submission?

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



## A. Permission Application Number and Name of Applicant **SUB 216**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Michael Thomas
Organisation	Individual
Date	8 Feb 2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## **F. Objection or submission**

The specific parts of the application that this objection or submission relates to are:

I strongly support the ongoing access to and enjoyment of the National Park via snow sports activity at Turoa.

I submit that conditions should be made easier and more permissible than the applicant has suggested, perhaps they have self-restricted to some degree to increase likelihood of acceptance of the application.

One example would be the 10 year term, this appears short (even with the rights of renewal).

Another would be the reduction in skier numbers and footprint. The department should accept the application and support the applicant to explore as wide a footprint and capacity as are needed for snow sports viability at Turoa

My reasons for my objection or submission are:

A timely and workable lease and licence to operate is essential to any business willing to take the risk to invest in the operations and infrastructure needed to support the enjoyment of visitors.

I strongly submit that the department and other stakeholders permit as flexible and open right to lease and operate as possible to ensure the ongoing viability of investment and operations at Turoa.

The loss of snowsports in Tongariro would be a tragedy for the community and all those who love to visit.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Longer initial term (suggest 25 years with right of renewal) This is much more typical of the investment lifecycle of infrastructure assets.

Suggest no or relaxed conditions about skier capacity and footprint

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## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

### How do I submit my objection or submission?

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



## A. Permission Application Number and Name of Applicant SUB 217

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised  
on behalf of submitter

Organisation

Date

3/2/24

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

Short Sited on the proposed reduction in lifts in Turoa  
Short term of the concession applied for.  
Privatisation prior to negotiation (let alone settlement) of TNP treaty claim(s)

My reasons for my objection or submission are:

I do not believe a rush to privatise  
I am aware of the feedback and from that feedback and for the longer term survival of Tūroa ski field, it is best to -  
Retaining both ski areas under one umbrella  
Retaining not-for-profit  
Retaining community ownership/accountability  
Long term planning to ensure the intergenerational legacy handed down to us by the RAL founders be handed on to all.

The corporate solution, as proposed goes in exactly the opposite direction.  
The proposals in regard to removal of lifts I see as showing a fundamental lack of understanding of good ski area design. The existing lifts were negotiated and agreed to. They should remain. The removal of lifts to concentrate riders into a narrower set of terrain features is detrimental to benefit, use and enjoyment of the park. Turning Tūroa into a two-lift-wonder is a disaster in the making. It will concentrate all uses in a smaller amount of choked space.

All this has the real potential to make Tūroa far less enjoyable for pretty much everyone. This is a negative for Ohakune and Raetihi in the long run.  
It is also a negative for Whakapapa as the disgruntled Tūroa skiers then congest Whakapapa.

RAL went bust from a combination of poor governance, poor management and a corporate mentality on the board that took it away from a successful low-debt conservative stewardship over 70 years to a high-debt high-risk model.

The application as is available for the public, contains none of the information required to be able to make any judgement on their ski area expertise, financial prowess etc. If I cannot support a proposal that leaves me no choice but to oppose. Our precious maunga deserves no less!

The proposed 10 year concession timeframe only serves to increase my concerns. It is too short sighted. Nobody is going to make the expensive capital investments required to maintain a quality ski area infrastructure on a 10 year timeframe.

Possibly the most important factor though is iwi. There remains an entire Tongariro National Park Treaty claim to process. . Until those are done we don't even know who will be at the negotiating table,

Privatising any the upper reaches of Ruapehu, or the facilities thereon is an absolute slap in the face to the good faith require by the process. It's putting the cart before the horse.

The outcomes that need to be addressed by this application are:  
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Reject any privatisation/ sale of RAL ski area assets. The crown to retain the existing concessions. Crown to engage in good faith with iwi and the wider community to run the ski areas to best industry practice, to allow the time and safe working relationship for TNP claims to be settled.

Then, and only then, a proper solution can be concluded.  
That might indeed be privatisation.

I ask the Minister to not play fast and loose with Crown Iwi relations to the short term benefit of a few individuals and a diminished ski area.

We all deserve better.

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

### How do I submit my objection or submission?

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.

## A. Permission Application Number and Name of Applicant SUB 218

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter

James Bel

Organisation

Date

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. Environmental
2. Cultural
3. Tourism impact on the region

My reasons for my objection or submission are:

### 1. Environment

We have engaged with the Pure Turoa Ltd management team throughout the process leading up to their DoC Concession Application and understand their application to be aligned with our organisation's environmental values for the region. We believe they have a team that is experienced and highly competent in operating within the framework of the Tūroa concession and their company's stated values indicate they aim to greatly exceed the environmental performance of historical ski operations on the mountain.

### 2. Cultural

Our organisation works closely with local iwi, primarily Ngati Rangī, and we are satisfied that Pure Turoa Ltd has worked closely and productively with Ngati Rangī prior to submitting the application. They have kept Ngati Rangī fully informed and have listened to their concerns and ideas resulting in a plan for the Tūroa ski area that aligns with iwi cultural and environmental aspirations to the long term benefit of all stakeholders.

### 3. Tourism Impact

As a local community organisation who understand the specific environmental challenges and opportunities important to our region, we strongly support Pure Turoa Ltd's Tūroa ski area concession application. We believe they have an excellent understanding of what is required to ensure that such a vital tourism activity for our region is managed for long term sustainability that will benefit generations to come.

As an organisation we look forward to working with Pure Tūroa Ltd in development opportunities for Ohakune.

The outcomes that need to be addressed by this application are:



Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

None. We have no requests for amendments

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

### How do I submit my objection or submission?

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## A. Permission Application Number and Name of Applicant **SUB 219**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter

Megan Jenkins

Organisation

Date

8 February 2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

My reasons for my objection or submission are:

Sec 9(2)(a) – I started coming to Ohakune for Tūroa in 1979 shortly after the skifield opened. I enjoyed childhood and teenage years skiing at Tūroa and my children have done the same – Sec 9(2)(a) I enjoy the National Park at all times of the year – I might not ski as much as I used to but I think everyone should have access to all of those amenities that exist. Skiing and boarding is much more accessible these days than it was in the 1980s. Ohakune and Raetihi are very special places. I see real benefit in approval of Pure Tūroa’s application.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

---

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this ‘objection or submission form’.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

**How do I submit my objection or submission?**

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



## A. Permission Application Number and Name of Applicant **SUB 220**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Claire Mitchell
Organisation	
Date	8/2/24

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. This application by Pure Turoa, fails to address a solution for the Whakapapa side of Mt Ruapehu
2. Lack of proper consultation with local iwi
3. This application will result in less skier capacity and available ski lifts

My reasons for my objection or submission are:

1. I object to the PTL application, because I believe a solution needs to be found that addresses continued operation of both the Whakapapa and Turoa ski fields
2. I also object to the application, because I don't believe the local iwi have been respectfully negotiated with and that many iwi oppose this application and that it could be in breach of the Treaty
3. I object to the application because they are proposing to remove some significant lifts and also reduce the skier capacity, meaning reduced public access for everyday Kiwis

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

As a parent of 2 adult children who are Life Pass holders, I would like to see the Crown forgive the RAL debt and hand control of RAL to a refreshed governance and management team. I worry that this application will limit the access not just for my children but for most Kiwis. We need to preserve the public's access to snowsports on Mt Ruapehu. The combined ski fields successfully generated excess cashflow over winter 2023, so no new government money is required for them to continue trading as a going concern, but the situation could be permanently resolved by releasing the government debt and letting the snow community get on with it.

We also need to cease ignoring iwi. They must have their say in any concessions granted or any sale of RAL assets and be respectively part of any negotiations.

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## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

**How do I submit my objection or submission?**

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



## A. Permission Application Number and Name of Applicant SUB 221

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Carrie Irvine
Organisation	
Date	7 February 2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing



## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

All parts. I **support** the granting of concessions to Pure Tūroa Ltd.

My reasons for my submission are:

I **support** the granting of concessions to Pure Tūroa Ltd for the following reasons:

1. As manuhiri I enjoy spending time around and on Mt Ruapehu, whether on the snow, in the forests and alongside the awa that flow from Ruapehu's glaciers.
2. I hope to see the skifield operated by those who consider the needs of the rohe and surrounding whenua and can balance this with the need to operate a commercially viable business.
3. The application is to operate the skifield within amenity area of Tūroa Ski Area as identified in the National Park Management Plan, and falls within the same boundaries as the concession which was recently granted to Ruapehu Alpine Lifts.
4. Pure Tūroa have demonstrated in their concession application and supplementary public statements that they have heard concerns from mana whenua about the environmental impact of operating the skifields.
5. The proposal to remove lift infrastructure from the south-east area of the skifield is a prudent one because:
  - a. A lift located at such a low elevation without snow-making can't be reliably operated for much of the winter.
  - b. Tūroa does not have a water reservoir in place to pool water from this awa to enable snowmaking to occur in this area.
  - c. Removal of lift infrastructure from this area will protect this awa and mitigate risk of contamination ensuring a clean water source for downstream communities.
  - d. I tautoko kaitiaki who wish to protect this awa and the taonga that surround it.
6. The proposed replacement of the Movenpick and Parklane lifts with an express gondola or chair with mid-station will significantly improve the on-mountain experience for users of the skifield because:
  - a. It will enable earlier opening of the skifield and has greater uphill capacity, I would expect this will significantly reduce wait times mitigating the environmental impact of crowding around the base area.
  - b. The addition of a mid-station to the replacement lift will enable a better progression experience for skiers/snowboarders who are learning at Tūroa. As someone who did learn to both ski and snowboard at Tūroa and has taught others to ski/snowboard there I would have loved to have had this.
  - c. The proposed replacement lift offers access to all the same terrain accessible from the existing Movenpick lift and access to the High Noon lift from which the remaining terrain within the ski area boundaries may be accessed.
7. The proposed increased operating area for the beginner ski slope will be a significant improvement for those learning to ski. Proposals to widen the "Clarry's Track" trail would be a significant improvement to the facilities on offer and as a trade-off for reduction of the lift footprint would help mitigate congestion and the issues that creates.
8. Proposals to better manage car parking will lead to an improved experience and mitigate damage to the mountain. I have for many years purchased RALs parking pass and have enjoyed knowing I would have carpark access and not be turned away due to full carparks. The environmental impact of cars queued from top to bottom of the mountain is significant and is something the operator of the skifield should seek to mitigate.
9. Granting this application for concession is consistent with section 6(e) of the Conservation Act 1987 which states:

*"to the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism."*
10. Pure Tūroa have demonstrated resilience and commitment to the community, Hapū, Iwi, local businesses, and users of the mountain. They have significant support within the local rohe and with kaimahi employed on the mountain.

11. I believe granting this application for concession is in the best interests of the communities that rely on operation of Tūroa ski area.

The outcomes that need to be addressed by this application are:  
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I submit that the Department of Conservation:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area
2. That the concession be granted with a 3 year review at which time an extension to the term of the concession may be sought.

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

### How do I submit my objection or submission?

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.



## A. Permission Application Number and Name of Applicant SUB 222

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Kenzie Irvine
Organisation	
Date	7 February 2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

All parts. I **support** the granting of concessions to Pure Tūroa Ltd.

My reasons for my submission are:

I **support** the granting of concessions to Pure Tūroa Ltd for the following reasons:

1. As holder of an RAL Life Pass I would rather see a reliable, sustainable business operating the skifield than have continued access to old unreliable lifts or continued uncertainty.
2. As a young person who hopes to have many more years on and around the area I want to see the natural environment of Mt Ruapehu and it's surrounding areas managed in a way that mitigates risk and has a clear vision for the future of recreation and enjoyment of this significant natural area for all for many years to come.
3. Pure Tūroa have demonstrated a clear strategy and capability to work with mana whenua and other stakeholders in the best interests of all while respecting tikanga and processes which must be followed to enable this.
4. I support the removal of older lifts from the mountain, I want to be able to enjoy the natural beauty of the mountain without the noise and clutter that the lifts create.
5. I don't want to see another environmental disaster like the one a few years back where diesel leaked into the river. Removing the older lifts will help prevent a possible repeat of this.
6. The application is to operate the skifield within amenity area of Tūroa Ski Area as identified in the National Park Management Plan, and falls within the same boundaries as the concession which was recently granted to Ruapehu Alpine Lifts.
7. The proposed improvements to the ski area will give me and other young people a far better experience of the mountain. The existing beginner area and trails are too small and crowded, adding space to these will give better enjoyment of the mountain for visitors.
8. I like the idea of limiting numbers of vehicles and people as suggested. The environmental impact of all cars running while queued on the road is significant and when the carparks get overfilled damage is being done to the surrounding areas.
9. Granting this application for concession is consistent with section 6(e) of the Conservation Act 1987 which states:  
*"to the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism."*
10. I believe granting this application for concession is in the best interests of the communities that rely on operation of Tūroa ski area.

The outcomes that need to be addressed by this application are:

Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I submit that the Department of Conservation:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area
2. That the concession be granted with a 3 year review at which time an extension to the term of the concession may be sought.

---

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

**How do I submit my objection or submission?**

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.

## A. Permission Application Number and Name of Applicant SUB 223

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Glen Irvine
Organisation	
Date	7 February 2024

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

All parts. I **support** the granting of concessions to Pure Tūroa Ltd.

My reasons for my submission are:

I **support** the granting of concessions to Pure Tūroa Ltd for the following reasons:

1. As manuhiri I enjoy spending time around and on Mt Ruapehu, whether on the snow, in the forests and alongside the awa that flow from Ruapehu's glaciers.
2. I hope to see the skifield operated by those who consider the needs of the rohe and surrounding whenua and can balance this with the need to operate a commercially viable business.
3. The application is to operate the skifield within amenity area of Tūroa Ski Area as identified in the National Park Management Plan, and falls within the same boundaries as the concession which was recently granted to Ruapehu Alpine Lifts.
4. Pure Tūroa have demonstrated in their concession application and supplementary public statements that they have heard concerns from mana whenua about the environmental impact of operating the skifields.
5. The proposal to remove lift infrastructure from the south-east area of the skifield is a prudent one because:
  - a. A lift located at such a low elevation without snow-making can't be reliably operated for much of the winter.
  - b. Tūroa does not have a water reservoir in place to pool water from this awa to enable snowmaking to occur in this area.
  - c. Removal of lift infrastructure from this area will protect this awa and mitigate risk of contamination ensuring a clean water source for downstream communities.
  - d. I tautoko kaitiaki who wish to protect this awa and the taonga that surround it.
6. The proposed replacement of the Movenpick and Parklane lifts with an express gondola or chair with mid-station will significantly improve the on-mountain experience for users of the skifield because:
  - a. It will enable earlier opening of the skifield and has greater uphill capacity, I would expect this will significantly reduce wait times mitigating the environmental impact of crowding around the base area.
  - b. The addition of a mid-station to the replacement lift will enable a better progression experience for skiers/snowboarders who are learning at Tūroa. As someone who did learn to both ski and snowboard at Tūroa and has taught others to ski/snowboard there I would have loved to have had this.
  - c. The proposed replacement lift offers access to all the same terrain accessible from the existing Movenpick lift and access to the High Noon lift from which the remaining terrain within the ski area boundaries may be accessed.
7. The proposed increased operating area for the beginner ski slope will be a significant improvement for those learning to ski. Proposals to widen the "Clarry's Track" trail would be a significant improvement to the facilities on offer and as a trade-off for reduction of the lift footprint would help mitigate congestion and the issues that creates.
8. Proposals to better manage car parking will lead to an improved experience and mitigate damage to the mountain. I have for many years purchased RALs parking pass and have enjoyed knowing I would have carpark access and not be turned away due to full carparks. The environmental impact of cars queued from top to bottom of the mountain is significant and is something the operator of the skifield should seek to mitigate.
9. Granting this application for concession is consistent with section 6(e) of the Conservation Act 1987 which states:

*"to the extent that the use of any natural or historic resource for recreation or tourism is not inconsistent with its conservation, to foster the use of natural and historic resources for recreation, and to allow their use for tourism."*
10. Pure Tūroa have demonstrated resilience and commitment to the community, Hapū, Iwi, local businesses, and users of the mountain. They have significant support within the local rohe and with kaimahi employed on the mountain.

11. I believe granting this application for concession is in the best interests of the communities that rely on operation of Tūroa ski area.

The outcomes that need to be addressed by this application are:  
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

I submit that the Department of Conservation:

1. **Grant the concessions** sought by Pure Turoa Ltd to operate Turoa Ski Area
2. That the concession be granted with a 3 year review at which time an extension to the term of the concession may be sought.

## G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment

### How do I submit my objection or submission?

Complete this form and email to [mtruapehusubmissions@doc.govt.nz](mailto:mtruapehusubmissions@doc.govt.nz). You may also mail your objection and submission to: Director-General, c/o Permissions Hamilton, Department of Conservation, Private Bag 3072, Hamilton 3240.





## A. Permission Application Number and Name of Applicant **SUB 224**

Pure Tūroa Limited 109883-SKI

## B. Name of Proposed Activity and Location(s)

Lease and license to operate Tūroa Ski Area on Mount Ruapehu in Tongariro National Park for a period of 10 years. The application also includes associated aircraft and filming activities.

## C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of submitter or person authorised on behalf of submitter	Tim, Kath, Lucy Laura and Taylor Manning
Organisation	Life pass holders
Date	8 Feb 24

## D. Statement of Support, Neutrality or Opposition

- I **Support** this Application (I am making a submission)
- I am **Neutral** on this Application (I am making a submission).
- I **Oppose** this Application (I am making an objection).

## E. Hearing Request

- I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- I **Do** wish to be heard in support of this objection or submission at a hearing

## F. Objection or submission

The specific parts of the application that this objection or submission relates to are:

1. The duration of the concession is only 10 years.
2. The Tongariro National Park (TNP) treaty claim(s) have not been negotiated or settled.
3. Not enough information to know if Pure Tūroa Limited (PTL) will be financially sound.
4. The decreased access to the mountain if the concession is awarded.
5. The concession excludes wider alpine snow sports assets on Mt Ruapehu, specifically Whakapapa.
6. Compressed negotiation and consultation period.
7. Redaction of important information, including parties involved and consulted.

My reasons for my objection or submission are:

1. There currently remains an existing concession on the site of 60 years.

The short length of the concession sought indicates a clear lack of a long-term commitment to the operation, to the wider area and opens the door for asset stripping and an imbalance between commercial priorities and public interest. Environmentally, the longer the commitment to a place, the more invested a party is in the sustainability of a place. The PTL concession falls short on this front.

2. Tongariro National Park (TNP) treaty claim(s) may lead to immediate litigation costs.

The well publicised interests of other parties (including those under a Treaty claim) in the existing concession and RAL assets mean that should this PTL concession be awarded at this time, there is high risk of conflict and subsequent litigation which will bleed resources which could otherwise be used to enable and ensure equitable access to the assets and the ski field.

3. It is difficult to tell if the business will be financially viable.

Appendix 7 cash flow model makes it difficult to tell if the business makes commercial sense.

Information provided excludes information on what DoC and MBIE will need to pay to remove infrastructure from the mountain if the business fails.

4. Increased costs and decreased mountain capacity will make Tūroa less accessible to New Zealanders.

The reduction in capacity with the removal of the Nga Wai Heke chair, Giant Chair, and the Wintergarden Platter and less operational days, longer inactive vs active time on the mountain and lowered accessibility to the Maunga during the operating season. The lower capacity of 4500 would see increased demand, leading to price increases which will take the cost of utilising this natural resource beyond the reach of most New Zealanders.

5. Competing business interests with Whakapapa and lack of complementary business operation.

A lack of synergy between the other snow sports assets on Mt Ruapehu lowers the chance of mitigating partial operational closure across the Maunga – further reducing access for those who have travelled some distance to stay and experience the thrill and majesty of Mt Ruapehu.

6. Past concessions negotiations took around four years.

The short period of time between the consultation period and opening of the 2024 season means that there

cannot be full consideration of important aspects.

7. Key information has not been provided.

The extensive redaction of names (e.g. Directors of PTL), this information is a matter of public record and should not be redacted.

Iwi engagement has been completely redacted.

The outcomes that need to be addressed by this application are:  
Give precise details, including the parts of the application you wish to have amended and the general nature of any conditions sought if the application is approved.

Any concession needs to be for a longer period of time (minimum 30 years).

Any concession needs to show partnership and/or endorsement from mana whenua. Cease ignoring iwi and retract from seeking new concessions, as they have said they will not approve new concessions until Treaty claims are settled on the Maunga.

Keeping the existing RAL concession in place provides a safe working relationship while the TNP treaty claims are being negotiated between the Government and various iwi interests over coming years.

Any concession should be for the whole mountain, being Whakapapa and Tūroa.

Any concession needs to show active consideration of ongoing accessibility (including socio-economic) to the Operation within this National Park. Especially as a non-profit operator is seen as being more compatible with public access to a National Park environment.

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