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Submission on the Aotearoa New Zealand Government Tourism Strategy

## The NZCA's submission on the Aotearoa New Zealand Government Tourism Strategy

Submitted 4 February 2019: Read the NZCA's submission on the Aotearoa New Zealand Government Tourism Strategy.

**Submission date:** 4 February 2019

**Submitted to:** Ministry of Business, Innovation and Employment

# The Legislative Basis for the New Zealand Conservation Authority submission

1. The New Zealand Conservation Authority (the Authority) was established under the Conservation Act 1987, with members appointed by the Minister of Conservation. It is an independent statutory body with a range of functions, but primarily acts as an independent conservation advisor to the Minister and the Director-General of Conservation.
2. The Authority has a growing role as an objective advocate on matters of national significance and interest in the conservation arena and to provide high quality independent advice to the Department of Conservation (DOC) on its strategic direction and performance.
3. The Authority has a range of powers and functions, under the Conservation Act 1987, as well as under other conservation related legislation. Under the Conservation Act, Section 6C(2)(c), the Authority has the power to “advocate the interests of the Authority at any public forum or in any statutory planning process.”
4. Section 6B(1)(d) also states that one of the functions of the Authority is to “investigate any nature conservation or other conservation matters the Authority considers are of national importance, and to advise the Minister or the Director-General of Conservation, as appropriate.” The Authority sees the development of this Strategy to be a conservation matter of national importance.
5. Following the logic of the above powers and functions, the Authority have decided to submit on the MBIE consultation document – Aotearoa New Zealand Government Tourism Strategy.

## General Comments

6. Tourism is an important and significant contributor to the New Zealand economy, including Government income due to the GST collected, and generates other social, cultural and environmental benefits. As a ‘non-measured’ diverse sector in the New Zealand economy, its contribution is easy to underestimate. This submission is made in the absence of clear data as to the extent of both benefits and costs from the tourism sector to New Zealand.
7. Due to the scale of the tourism sector and projections for its growth, the Authority agrees that the Government has an important part to play in safeguarding tourism benefits for New Zealand, while at the same time mitigating the very real negative impacts associated with the hosting of visitors.
8. This Strategy currently appears to be more of a discussion paper, as opposed to providing a clear framework. It is aligned with the Government’s goals for tourism and so it provides a way to assess and prioritise different investment choices and align these investments at a regional level. In many cases it describes what is happening currently and where the information gaps are (e.g. impact of climate change on future visitation), rather than indicating a clear path forward. That said, we consider it to be a useful document in providing greater clarity as to what the main issues are going forward, what is happening at government level regarding the tourism sector, and alignment sought at a regional level.

9. The Authority welcomes the Strategy recognising “the importance of the future tourism system being environmentally and socially sustainable, as well as economically sustainable... the potential impacts of climate change on the sector... and support for the government’s focus for a just transition to a ‘clean, green and carbon neutral New Zealand’.”

10. The following statement included in the document is strongly supported by The Authority - “An important focus for this Strategy is to ensure that New Zealanders’ ability to explore and enjoy their own country as domestic visitors is preserved in the context of increasing visitor numbers. This is particularly critical in relation to New Zealand’s access to public conservation lands and waters.”

11. The Authority also strongly supports the Strategy’s recognition of the importance of maintaining the quality of our natural environment and protecting it from visitor impacts, including increasing biodiversity risks.

## Realism about government’s ability to influence the nature of the tourism sector

12. Tourism as a sector generates both positive and negative impacts for New Zealand. It has certain innate characteristics and while improvements can be made in some of these areas, this is the nature of the sector. For example:

- Tourism inevitably changes the character of a destination, especially in areas of high visitation.
- International travel patterns can alter rapidly due to world events, economic factors, etc.
- Tourism involves travel which is negative for global warming (e.g. international flights).
- Tourism competes with other sectors of the economy, such as labour requirements and access to the environment, making the overlap with other sectors an important consideration.
- Diversity of overseas markets generating visitors for New Zealand is largely determined by their economic strength and flight connectivity.
- Tourism is labour-intensive and most employment is, and will continue to be, seasonal, low skilled and low paid. Alternatively New Zealand will become less competitive as a destination.
- Perceived tourism icons will always attract the majority of visitation.
- The most favourable seasons for travel will always be the most popular.

13. For these reasons and based on projections for growth in tourism numbers, it would be useful for this Strategy to address what proportion of the economy the Government considers tourism should ideally make up if it wants to improve New Zealander’s quality of life and protect the New Zealand environment.

14. The logical conclusion of the Strategy, with its focus on better management and mitigation of the impacts of growing visitor arrivals in reaction to increasing global demand for tourism will inevitable, result in New Zealand becoming a mass market tourism destination if demand continues to grow. As a country, is this what we should be aiming for?

15. In saying this the Authority acknowledges that longer term growth is not necessarily a given, particularly due to the potential impacts of climate change.

16. The Authority supports the Government taking a much more proactive stance both regarding actual visitor arrival numbers and management/mitigation of their impacts.

## Conservation estate critical to tourism

17. New Zealand conservation lands and waters under government control, mostly DOC, make up approximately one-third of New Zealand and are extremely important as they underpin the tourism sector. On this basis we consider the actual DOC Visitor and Heritage Strategy needs to be more visibly incorporated within the Aotearoa New Zealand Government Tourism Strategy.

## In response to the questionnaire

### What do you think about the Government's proposal to take a more active and deliberate role in the tourism sector?

18. The Authority is very supportive of the Government taking a more active and deliberate role in the tourism sector. Government leadership is especially important due to the tourism sector's high level of complexity and diversity within the public and private sector comprising of many players.

19. In our opinion the Government's role (through Tourism New Zealand) is currently very strong and effective, in terms of marketing New Zealand as a tourism destination to international visitors, but inadequate in terms of involvement in the actual delivery of the tourism experience within New Zealand, including mitigation of negative environmental and social impacts. The failure of the current tourism system often in specific areas (e.g. adequate provision of needed tourism infrastructure/services in areas with low rating bases; extent of accidents attributed to international drivers; impacts of freedom campers; level of congestion at popular visitation sites such as Punakaiki, Tongariro Crossing, Milford Sound, Hooker Valley, Mount Cook, Franz and Fox Glaciers, Cape Reinga, etc.) is in our view why support for tourism in New Zealand (social licence) has declined.

### What are the areas you think should be a particular focus?

#### Global warming and government move towards a low emission economy

20. The Authority agrees a priority area should be to "deepen understanding of the implications for the tourism sector of climate change and the move towards a low emissions economy."

21. Climate change and the global move towards reducing carbon emissions, and New Zealand's focus on transitioning to a low emissions economy, will have significant impacts for the tourism sector. Many questions remain regarding determining the best approach going forward and the Authority agrees dialogue is needed to develop strategies for New Zealand's transition.

22. At the same time, the Authority believes the Strategy now should go further in indicating the Government's priorities for tourism in reducing our carbon emissions, as well as signalling how these will affect the tourism sector based on what information is already known.

#### Reviewing New Zealand's Open Skies Policy

23. The Authority supports continuation of Tourism New Zealand's work to lift value over volume and encourage off-peak growth through the application of targeted interventions, and the Strategy's

support for this approach. We believe this should also be the wider Government's position and all levers should be used in a joined-up way in this regard. In our opinion this necessitates New Zealand reviewing its current multi-lateral open skies policy which enables unrestricted services by the airlines of the countries involved to, from, and beyond the others territories without prescribing where carriers fly, the number of flights that operate and the prices they charge (e.g. How can a value add and seasonal spread tourism policy be consistent with accepting additional budget and charter flights into New Zealand during the tourism high season?). Without a review of this policy we believe New Zealand will inevitably become a mass market tourism destination if global growth continues and New Zealand remains popular.

24. At the very least the implications of New Zealand being a signatory to this multi-lateral open skies policy should be outlined in the Strategy.

## Protecting our natural environment and biodiversity

25. While Strategy acknowledges the importance of the tourism system being environmentally sustainable, including in the context of climate change and protected from biosecurity risks – and that tourism makes a positive contribution to conservation, it doesn't provide clear guidance on what should happen going forward in this regard apart from mostly describing initiatives already underway. New Zealanders holidaying in their own country are increasingly finding themselves crowded out of iconic locations and there is a limit to how much some sites (e.g. Milford Sound) can be 'hardened' to handle ever increasing tourism numbers without negative social and environmental impacts.

## Regional planning and development

26. The Authority supports the Government's goal in the Strategy of achieving more inclusive tourism growth across regions. The Authority suggests this should include a review undertaken nationally, but on a regional basis, of the regions' heritage (natural, cultural and historic) and infrastructure of tourism significance, and the role of their regional tourism organisations (including how these link to other stakeholders, e.g. DOC, economic development agencies, smaller tourism networks and organisations). This recommendation recognises that many regional tourism organisations are currently primarily marketing organisations competing for visitors, and some do not have the resources to undertake in depth tourism analysis and planning, or at times be inclined to work in a coordinated and aligned way.

## Implementing more equitable funding

27. The Authority supports the tourism sector and international visitors in some instances paying more directly for what they use, including the externalities of what they generate, to ensure costs aren't falling unfairly on local ratepayers and the Government. This is especially regarding usage of National Parks.

28. One advantage of applying a more direct payment system is that pricing mechanisms can be used to assist in managing visitor numbers and dispersal (seasonal, geographic).

## Infrastructure shortfall

29. Solving the shortfall in key infrastructure requirements, such as sanitation, drinking water, parking, etc. where tourism numbers have outpaced the ability of ratepayers to fund, is another area that should be of particular focus.

30. The better alignment by the Government of tourism investment priorities with mitigating costs/impacts at a local level would improve sustainability of the tourism sector (i.e. already \$2-3 billion each year is collected by Government in GST payments from international visitors).

31. In this regard, the Authority is also very supportive of the International Visitor Tourism and Conservation Levy being introduced.

## Are there areas where the government's role should be limited?

32. The Government should not have a role in directly subsidising privately owned tourism businesses.

## The draft strategy proposes 5 tourism outcomes for government. Do you support these outcomes and are these the right outcomes to focus on?

33. The Authority supports the 5 tourism outcomes listed with the following provisos:

<b>Outcomes</b>	<b>The Authority's view</b>
NZ benefits from more productive tourism growth	Agree
Exceptional visitor experiences ensure the sector's future success	Remove 'exceptional' as makes this tourism outcome out of kilter with the wording of all 4 other outcomes, i.e. NZ has a tourism sector primarily to benefit NZ
Tourism protects and enhances NZ's natural, cultural and historic heritage and promotes NZ culture	The first statement describing long term success beneath this outcome should be amended to read 'Visitors and the tourism sector are contributing fairly to protecting and enhancing NZ's natural, cultural and historic heritage' (so it matches the outcome sought)
New Zealanders lives are improved by tourism	Agree
Regions and communities' benefit from tourism	Agree

## The strategy identifies an ambitious work programme for government. What are the highest priority actions from your perspective?

34. They are:

- Better understanding the likely impacts of global warming on tourism, including the global move towards reducing carbon emissions
- Transitioning New Zealand to a low emissions economy
- Implementing DOC's Heritage and Visitor Strategy

- Implementing the International Visitor Tourism and Conservation Levy
- Reviewing New Zealand's Open Skies Policy
- Reviewing pricing on the DOC estate and consideration more generally of tiered pricing systems
- Solving the current tourism infrastructure shortfall
- Increasing revenue generation from international visitors to mitigate infrastructure, environmental and other pressures
- Growing Māori opportunities in tourism
- Supporting emerging/embryonic tourism regions where they have good potential

## What are the areas in this draft policy you think could be strengthened?

35. Priority for strengthening is Annex 1 - A proposed Government investment framework for tourism.

### Was this information helpful?

Yes

No

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