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Ministry for the Environment
PO Box 10362
WELLINGTON 6143

E-mail: adaptation@mfe.govt.nz

Kia ora

Tourism Industry Aotearoa Submission on the Draft National Climate Change Adaptation Plan

TIA welcomes the opportunity to provide comment on behalf of the wider tourism industry on the Draft National Climate Change Adaptation Plan.

TIA's Overall Position

TIA supports the direction of travel set out in the draft Plan. It forms part of the overall comprehensive government response to both reducing emissions and climate change adaptation. TIA is pleased that momentum is building towards the action phases of this important work.

This overall framework in the Adaptation Plan serves to activate the public sector and the national policy settings, which in turn helps industries like tourism to engage in the processes. This means that TIA can contribute to addressing matters of most interest to the wider tourism industry.

In this submission, we have not directly addressed the 51 questions as they did not directly relate to the views we are seeking to convey in this submission. Rather, we have focussed our feedback on the two tourism-specific Actions, the many Actions that will impact tourism in some way or other, and on our ability to contribute.

- **Tourism-specific Actions**

Feedback on the two tourism specific actions:

- ***Deliver the Tourism Industry Transformation Plan.*** *Complete the environment pillar of the Tourism ITP, including a roadmap for the industry on climate adaptation, by quarter 4 2023.*

This points to the current Tourism ITP process with its environment pillar currently being developed and which we understand will include a roadmap for tourism climate adaptation. We welcome this, but it is not clear that this process will establish an enduring roadmap for tourism climate adaptation. With the Tourism ITP being a limited-duration project, it may set a plan but then not see it through. TIA considers the ongoing process to be important given that navigating the pathway over time will necessarily be very iterative. A wider, more enduring vehicle for developing and maintaining a tourism roadmap for climate change adaptation is clearly needed.

Recommendation. This Action needs to point to a more enduring vehicle than the Tourism ITP (this could be a recommendation of the ITP) and the process to establish and operate this vehicle needs to fully involve industry.

- ***Meeting the costs of a climate-resilient tourism sector.*** *By August 2024, the settings for the International Visitor Conservation and Tourism Levy have been reviewed.*

This points to the IVL as the funding source for tourism climate change adaption. This is extremely narrow given that the IVL will already be heavily drawn on for other tourism and conservation initiatives. Limiting to this fund will be insufficient for what will likely be very big costs down the line (airport re-location, coastal road re-routing, etc). Other funding solutions will be needed, and these should be identified or signalled in the Plan. Note also that tourism is a mix of international and domestic activity that is using mixed use infrastructure, again highlighting the breadth of tourism and the narrowness of the IVL-based funding source.

Recommendation. This Action needs to point to wider funding support than the IVL alone. Ideally, other pathways are identified.

- **Tourism-related Actions**

The reach of tourism throughout society means that many of the 116 Actions will impact tourism in some form - some heavily and some lightly. On one hand, it can be argued that tourism concerns will be taken care of by these wider processes, but on the other, our experience is that it is very easy to forget or misrepresent what tourism is, how it works and what it needs.

Recommendation: The Plan needs to make clear linkages between the Actions to ensure that industries, such as tourism, that are very pervasive and integrated across New Zealand, are proactively included within the wider body of work to be advanced over the years ahead.

Tourism Industry Aotearoa

TIA is the peak body for the tourism industry in New Zealand. With around 1,200 members, TIA represents a range of tourism-related activities including hospitality, accommodation, adventure and other activities, attractions, retail, airports and airlines, transport, as well as related-tourism services.

TIA established and updates the tourism industry's strategic document, *Tourism 2025 & Beyond – A Sustainable Growth Framework*. This has the Vision of 'Growing a sustainable tourism industry that benefits New Zealanders'.

In 2017, TIA launched the *New Zealand Tourism Sustainability Commitment - He kupu taurangi kia toitū ai te tāpoianga* - with the Vision of 'Leading the world in sustainable tourism'.

The TSC is implemented through the actions of individual businesses and entities who join the programme and take on its 12 Commitments, the most relevant to climate change adaptation being:

Commitment 11. Carbon Reduction:

We act urgently to contribute to Aotearoa New Zealand's transition to a net zero carbon economy.

In addition, we have elevated the importance of this Commitment with the launch of the *Tourism Carbon Challenge* in 2021 that seeks to activate all pathways for reducing tourism carbon emissions as quickly as possible. While not directly adaptation-related, it does indicate the strategic importance to the tourism industry of being organised and progressive as it looks towards the challenges that faces. Climate change is certainly very prominent amongst these challenges.

The Tourism Industry

The tourism industry, pre-COVID directly and indirectly contributed 9.4% of GDP and 13.7% of employment, as well as contributing 20.1% of export earnings.

The reason for citing these numbers is to reinforce how deeply, widely and pervasively tourism sits within Aotearoa New Zealand. It touches all communities in some form or other, it injects economic and social vibrancy, and it has become a very important part of who we are as a nation.

We are very mindful that tourism is widely spread throughout New Zealand and is therefore very sensitive to climate change: rising sea levels affecting coastal roads and accommodation, various types of infrastructure and access, and retreat over time; more extreme weather events causing increasing damage of infrastructure such as roading, 3 Waters, buildings, and others.

If tourism is affected, so will wider society. As such, it is very hard to unlock industry-specific interests, hence TIA supports the overall framework being set so it will play the most effective role in supporting tourism adaptation to the climate changes that are certainly coming our way.

Tourism-specific Actions

There are two tourism specific Actions:

- ***Deliver the Tourism Industry Transformation Plan (ITP).*** Complete the environment pillar of the Tourism ITP, including a roadmap for the industry on climate adaptation, by quarter 4 2023.

Assessment. This Action points to work MBIE is leading on the Tourism ITP, especially its environment workstream that is currently being established. TIA is involved in this process. A key input into this will be the work being led by the Aotearoa Circle on tourism climate adaptation and again TIA is involved. Going forward, the key thing for TIA is to stay closely involved in these processes to ensure they deliver powerful and practical outcomes to assist tourism adaptation.

TIA submits that this action should be wider than as it is currently expressed. For instance, while the Tourism ITP will be important, there are other strategy processes to be undertaken, including renewing the industry's Tourism 2025 Sustainable Growth Framework and we understand that the Government New Zealand Tourism strategy will be renewed at some point. Consideration will also need to be given to the duration of the ITP given the long-term nature of the climate change adaptation workstreams. We are interested in the task of the ITP to prepare a 'roadmap for tourism climate adaptation, including the ambition for this workstream and how this will be supported and updated over time.

Recommendation. This Action needs to point to a more enduring vehicle than the Tourism ITP (this could be a recommendation of the ITP), and the process to establish and operate this vehicle needs to fully involve industry.

- ***Meeting the costs of a climate-resilient tourism sector.*** By August 2024, the settings for the International Visitor Conservation and Tourism Levy have been reviewed.

Assessment. While it is good to see the signaling that the IVL can be accessed for tourism adaptation, TIA's reservation is that this fund will be insufficient for any large scale and capital-intensive adaptations that will very likely be needed at some point (e.g. replacing sea-level airports, re-routing low lying coastal roads, re-locating beach-side accommodation and holiday parks, etc.). While these potentially expensive areas may be accommodated in the overall framework of the Adaptation Plan, this is not clear. Also, tourism is a mix of international and domestic activity that uses mixed-

use infrastructure, much of which is established by communities over time, and which will need wider funding solutions for the adaptations needed.

With the IVL being a funding pool for enabling a wide range of actions that benefit tourism and conservation, it will be a very heavily subscribed fund. As such, TIA submits that in addition to what can be drawn from the IVL, it must be signalled that there are other pathways for larger scale support for climate change adaptation as and when needed. This suggestion relates back to the idea set out elsewhere in this submission about how integrated tourism is throughout New Zealand meaning that the overall framework must work for it, in conjunction with the specific responses.

Recommendation. This Action needs to point to wider funding support than the IVL alone. Ideally, other pathways are identified.

Tourism-related Actions

There are 116 Actions in the draft Plan and our observation is that many of these relate to tourism in some way.

Some of these are very macro in nature such as: Reform the resource management system; Establish a foundation work with Māori on climate actions; Review of local government; Set national direction through the National Planning Framework; Implement the national Disaster Resilience Strategy; and others. In some form, tourism needs to be involved in these processes.

Other Actions have a direct connection to tourism, including: Develop and implement the Waka Kotahi climate adaptation action plan; Continue prioritising research and investment in climate-related science; Research business adaptation preparedness and provide guidance to SMEs; Identify the impacts of climate change on regional economies; and others.

On one hand, the fragmented nature of tourism will make it difficult for tourism to engage in these processes and on the other, it is difficult for those agencies running these processes to know and understand tourism. In this, we see considerable risk that tourism will be omitted for some processes that will be very important for it.

Recommendation: The Plan needs to make clear linkages between the Actions to ensure that industries, such as tourism, that are very pervasive and integrated across New Zealand are proactively included in the wider Actions that will be advanced over the years ahead.

Further Input

TIA is already part of ongoing processes to build Aotearoa New Zealand's capacity to adapt effectively to climate change, including the Aotearoa Circle project, and we will continue to prioritise this area. As such, we wish to engage in any way so we can best achieve our shared objectives.

If you have any queries about our feedback, please contact Bruce Bassett on 021 609 674 or bruce.bassett@tia.org.nz.

Ngā mihi,



Bruce Bassett
Strategy and Policy Manager