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Submitted via: [environmentITP@mbie.govt.nz](mailto:environmentITP@mbie.govt.nz)

Kia ora

### **TIA submission on the Draft Tourism Environment Action Plan**

Tourism Industry Aotearoa welcomes the opportunity to comment on the Draft Tourism Environment Action Plan which has been established as part of the wider Tourism Industry Transformation Plan programme.

TIA has been deeply involved in the Tourism ITP workstream, with key staff involved at leadership and technical levels, and with a number of TIA Board members on the Leadership Group. With this level of engagement, TIA is familiar with the material set out in the draft report and is supportive of it.

In this submission, we will comment mostly on areas we see as important, and which may be strengthened in the final report.

### **Tourism Industry Aotearoa**

TIA is the peak body for the tourism industry in New Zealand. With over 1300 members, TIA represents a broad group of key tourism businesses across hospitality, accommodation, adventure and other activities, attractions, retail, aviation, land, and sea transport, as well as tourism-related services.

TIA established the tourism industry's strategic document, Tourism 2025 & Beyond – A Sustainable Growth Framework, Kaupapa Whakapakari Tāpoi. This has the vision of 'Growing a sustainable tourism industry that benefits New Zealanders'. TIA gives effect to this through the New Zealand Tourism Sustainability Commitment - He kupu taurangi kia toitū ai te tāpoitanga that was launched in 2017 to drive to a sustainable tourism future. Its vision is '*Leading the world in sustainable tourism*'.

TIA is currently resetting the Tourism 2025 industry strategy. There are many parallels between TIA's draft industry strategy and the work of the draft Environment ITP, with key sections that are common to both, including eliminating carbon, ensuring tourism is benefiting Te Taiao, lifting operator capability and addressing system-level constraints. This is heartening as both government and industry action is needed to drive the desired outcomes.

## TIA Feedback

The key points of TIA feedback on the six Tirohanga Hou are:

1. **Decarbonise Tourism.** This is the key area to address the main existential risk facing the Aotearoa New Zealand tourism industry. The issue is getting substantive action started quickly and across all arms of government and industry. TIA supports the Tourism Decarbonisation Roadmap, but we are very keen that this is an action exercise rather than a planning one.

In TIA's earlier Tourism Carbon Challenge, it was clear the key to making progress was activating all the available levers including science and research, policies such as the Emission Trading Scheme, incentivisation programmes, capital investments such as for recharging infrastructure, and measurement and information and capability support. Activating what is available is key. Carbon elimination targets are needed but the activation pathways must be the focus. With the aviation and cruise focus area, TIA's concern is around the scale of the work that can be activated which may mean we do things on the margin, rather than at the heart of the matter. We are also mindful that 90% of New Zealand's tourism emissions are transportation related.<sup>1</sup>

Aviation is without a doubt the biggest challenge to overcome. Sustainable Aviation Fuels will have some role to play, and we support this workstream, but we also ask: what wider initiatives can be activated to bring forward changes to the aviation technologies as they become available? What role is there for New Zealand in the international aviation decarbonising efforts? We feel it is important to place effort where the greatest progress can be made, and often this will be broadly-based rather than tourism specific. For instance, there are already-established Ministry of Transport-led processes such as the Decarbonising Transport Action Plan and Sustainable Aviation Aotearoa.

The 'Influencing the Visitor Mix' focus reflects the ability to manage the tourism system, with visitor mix being one of the levers. TIA considers the future tourism system will need more careful and deliberate management than we have seen in the past, and all possible levers will need to be assessed against the costs and benefits involved. Get the other areas right, and there will be less need to seek to influence the nature of demand.

The role of waste could be highlighted more in the document given that this is something we can influence or activate quickly and directly to reduce emissions.

2. **Champion Biodiversity.** TIA's perspective is that tourism can and must have an agenda for increasing the well-being of nature here in Aotearoa New Zealand. It can do this through its direct actions such predator control work, through generating economic activity that can be invested back into our care for nature, and through exposing people to experiences in nature - which is important for lifting public support about and for nature. It can also be done by addressing those areas where tourism activity has a direct impact on nature or biodiversity. Overall,

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<sup>1</sup> Stats NZ, Greenhouse gas emissions (industry and household): YE 2019.

in the Aotearoa New Zealand context, TIA already sees a positive relationship between nature and tourism, with this being something that can be built upon into the future.

TIA supports the establishment of better measurement of regenerative tourism, and Te Taiao aspects of this.

3. **Visitor Management for Te Taiao.** TIA supports better management of our places for both the protection of Te Taiao and for the quality of the visitor experience. Current settings make management difficult to do at many places and specific sites, and better approaches are needed. This will be increasingly important given the strong global growth drivers that exist (such as the global aircraft fleet to double over the next 20 years), meaning that more deliberate management of our places will be needed.
4. **Technology and Innovation Uptake.** TIA support moves to speed up technology uptake and innovation across the tourism industry. These include moves to reduce carbon emission and other areas of environmental impact, and to generate wider benefits such as better visitor experiences, reduced waste, better jobs, better productivity, and stronger industry economics.
5. **Tourism Businesses Incentivised and Enabled.** Through TIA's work in developing and enacting the Tourism Sustainability Commitment since 2017, it has become strongly apparent that to get businesses taking sustainable or regenerative actions, direct and practical support is needed. Evaluation of TIA's capability building programmes with cohorts of tourism businesses highlights the importance of this support.

As such, TIA strongly supports this Tirohanga Hou.

6. **Tourism System and Resources.** TIA welcomes the conclusions from this draft report around the need to change parts of the tourism system and funding for the ambition of the Environment ITP to be achieved.

Notably, in developing the draft industry strategy, our leadership group came to the same conclusion, with two related actions 'Develop and National Policy Statement for Tourism' and 'Address industry Funding'. At the heart of these are questions around how the tourism system should be designed and how it should be funded to enable it to ensure its regenerative future.

In defining these actions, TIA fully appreciates that Government will need to play a leading role to getting these actions underway, given that it controls the key levers. TIA is very keen to partner on the assessment or review processes that are established, alongside central and local government, and regional structures that impact tourism.

## Conclusions

TIA strongly supports the draft Environment ITP report, with the six Tirohanga Hou reflecting both the specific actions identified, and also how the wider system may need to be changed to enable these priority actions to be advanced.

In this, the draft report is closely aligned to the industry strategy that TIA is currently resetting. This also identifies the need for changes around system settings and funding, and that this has been a strong element of the TŌNUI report prepared by Regional Tourism New Zealand and Miles Partnership, and the interim report of the Tourism Futures Taskforce.

Together, this message needs to be carried forward in the final Environment ITP report and into the wider ITP process, including the next part that has been signaled on industry funding (or any other process that may emerge in this space).

Please do not hesitate to contact us if you have any queries about our feedback. We would like to continue to be involved in this process. Please contact Bruce Bassett at [bruce.bassett@tia.org.nz](mailto:bruce.bassett@tia.org.nz), or 021 609 674.

Ngā mihi,

A handwritten signature in black ink, appearing to read 'B. Bassett', with a stylized flourish at the end.

Bruce Bassett  
Chief Advisor