



tourism  
INDUSTRY  
ASSOCIATION NEW ZEALAND

**Submission regarding Doubtful Sound Bottlenose Dolphins**

**4 September 2007**

## **Introduction**

1. This submission is from the Tourism Industry Association of New Zealand (TIA), located at level 4, Travel and Tourism House, 79 Boulcott Street, Wellington.
2. The Tourism Industry Association (TIA) is the umbrella body that works for the interests of the tourism industry in New Zealand. The businesses we represent generate more than 85% of the country's tourism-related revenue while the industry itself consists of more than 11,000 small to medium sized enterprises.
3. If you wish to contact us regarding this submission, in the first instance, please telephone Geoff Ensor, Sector Manager on 04 496 4889 or e-mail him at [geoff.ensor@tiaz.org.nz](mailto:geoff.ensor@tiaz.org.nz)
4. The TIA submission comments on the Doubtful Sound Bottlenose dolphins in the Fiordland National Park

## **Comment**

5. The Association is aware of the concern regarding Bottlenose dolphins in Doubtful Sound and has read the threat management discussion paper dated July 2007. TIA respects and wishes to support DOC as it works to preserve indigenous species, habitats, ecosystems and natural features. A declining population of Bottlenose dolphins in Doubtful Sound is of concern and justifies a management response.
6. TIA believes any Department of Conservation (DOC) response to declining numbers of Bottlenose Dolphins in Doubtful Sound should be supported by robust recent research and careful consideration of all supporting evidence and opinions; such a response, when supported by a commitment to ongoing monitoring and collaboration will be crucial to achieving sustainable environmental and community outcomes.
7. For this reason, the Association supports a DOC review of the research (that we understand has been scheduled for September/October 2007) – and a subsequent panel review of management options and follow-up meetings with submitters.
8. The Threat Management Discussion Paper and submission process is a positive sign that DOC will proceed in a measured way, considering evidence and thoughts from a wide range of stakeholders within a reasonable time frame.
9. While a 'nil' management response would be totally inappropriate, a knee jerk response that fails to fully consider the experience of those who regularly ply the sound would be equally risky. Commercial operators have accumulated a huge bank of knowledge about the diurnal and seasonal habits of the Doubtful Bottlenose population and are well placed to contribute to any management decisions.
10. While operators regularly observe dolphins, TIA believes it is important to note that unlike other coastal examples where marine mammal watching is the experience

being offered to visitors, all the operators on Doubtful Sound offer Ecotours in a far broader sense i.e. if dolphins appear then it is considered a bonus for visitors.

11. Although it is inappropriate for TIA to comment on the methodology underpinning the research findings, we do note that many of the management options put up for discussion are based on research carried out from 1999 to 2002. While dolphin counts have continued since that time, the research itself is very dated and doesn't (for example) recognise changes made to operating procedures by commercial operators in the intervening years.
12. We understand that in 2004 operators worked with the Department to write and then implement a voluntary Marine Mammal Viewing Code of Practice; this was subsequently refined and modified in 2006. These changes may be pivotal given the claim that 70.6 % of dolphin-boat interactions observed during the research period violated the Marine Mammal Protection Regulations 1992. Irrespective of the validity of this figure (which is disputed by operators), much positive action has been undertaken since that time which needs to be acknowledged and factored into the current discussions.
13. Our Association is confident that if research was undertaken now, it would show a far greater compliance with the regulations and a marine mammal watching industry that has come of age.
14. The research suggests a direct link between vessel/dolphin behaviour and the decline of the dolphin population in the Doubtful Sound complex. However, within the discussion paper we can find no evidence that proves the link between vessel/dolphin interaction and mortality rates. We urge DOC to avoid a blinkered view of the cause of any decline and ensure equal effort is put into assessing other threat factors. It would be a tragedy if responsible operators became the target of management action while a more serious and insidious threat remained undetected.
15. Operators have a history of working with DOC to implement operational practices aimed at protecting the Doubtful Sound dolphins. We see no evidence to back draconian restrictions on vessel operations – rather we see an opportunity for operators and DOC to work even more closely in an effort to identify the cause(s) of dolphin decline and work collaboratively on a solution.

## **Background Information on the Tourism Industry Association New Zealand (TIA)**

1. The Tourism Industry Association New Zealand (TIA) advocates for the interests of the tourism industry in New Zealand. The businesses we represent generate more than 85% of New Zealand's tourism-related revenue.
2. Tourism is an \$18.6 billion industry (\$8.3b from international and \$10.3 from domestic tourism) with international tourist expenditure accounting for 19.2% of New Zealand's total export earnings.<sup>1</sup> The industry, directly and indirectly, employs 1 in 10 New Zealanders in a diverse range of businesses – the majority of which are small and medium sized enterprises. Not only is tourism important because of its size, representing 8.9% of New Zealand's GDP, it is:
  - Highly employment intensive;
  - Regionally disparate; and
  - Very diverse - ranging from large stock exchange listed companies to small cottage industries.
3. These businesses cover a range of tourism-related activities – hospitality, transport, adventure and activities, attractions and retail and related tourism services. In many cases, regional tourism businesses have developed around regional assets divested by other industries and has revitalized those assets and the communities that depend on them.
4. The tourism industry in New Zealand consists of more than 8,000 small and medium sized businesses. Of these businesses, most employ less than five people.
5. New Zealand welcomes more than two million overseas visitors to its shores every year. The domestic tourism industry is also important in helping to sustain a vibrant tourism industry. TIA estimates that over 75 million visitor nights are spent by New Zealanders every year.

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<sup>1</sup> "Key Tourism Statistics – July 2007", Ministry of Tourism website