



tourism  
INDUSTRY

ASSOCIATION NEW ZEALAND

**Improving Regulation of Environmental Effects in New  
Zealand's Exclusive Economic Zone**

**30 September 2007**

## Introduction

1. This submission is from the Tourism Industry Association of New Zealand (TIA), located at level 4, Tourism and Travel 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 Simon Wallace, Policy Manager, on 04 494 1842 or e-mail him at [simon.wallace@tiaz.org.nz](mailto:simon.wallace@tiaz.org.nz)
4. The TIA submission comments on the Ministry for the Environment's (the Ministry) discussion paper titled "*Improving Regulation of Environmental Effects in New Zealand's Exclusive Economic Zone*".

## Comment

5. In submitting on this discussion document, the tourism industry's main concern is to make sure New Zealand's valuable marine ecosystems and species are preserved while at the same time allowing sustainable economic activities to occur. Without a detailed knowledge of the specific regulations that govern New Zealand's Exclusive Economic Zone (EEZ), we have limited our comments to those of a more general nature.
6. If as proposed, this legislation leads to better outcomes in sustainable management of the marine environment, then TIA supports its purpose. As noted on page 2 of the discussion document, the environmental, economic and cultural values of the Exclusive Economic Zone (EEZ) are all interdependent and any legislative change must find a balance between these values.
7. Sustainable management and development are critical to the tourism sector. They are key elements of New Zealand's "clean, green" image which is at the heart of destination New Zealand's 100% Pure international visitor marketing campaign. Achieving environmental sustainability is also a key strategy and outcome area in the New Zealand Tourism Strategy to 2015 (the Strategy) that is currently being finalized and due to be released in early November 2007.
8. Tourism New Zealand's 100% Pure international marketing campaign has created strong customer expectations about the type of experiences visitors should expect to receive when they come here. International consumer perceptions have changed, particularly in New Zealand's key markets of the United Kingdom and Europe, with potential visitors from these countries now more tuned into the impacts of climate change. As a result, such visitors are fast expecting their holidays to match the 100% Pure campaign promise with its clean and green implications. Smart tourism operators are aware that their product offering must respond to consumer

perceptions about the new environmental challenges not only to be sustainable, but also to gain competitive advantage as a visitor destination.

9. The Strategy sets out the tourism sector's commitment to environmental management and the way in which it intends to protect and enhance New Zealand's land and marine environments. Some key actions, that link with the objectives of this discussion document, include:
  - seeking the completion of a national environmental management plan;
  - actively advocating and supporting stronger environmental policies and standards throughout New Zealand; and
  - influencing global forums and agreements on environmental issues that affect New Zealand tourism.

In this regard, a draft of the Strategy is enclosed and can also be downloaded at [www.nztourismstrategy.com](http://www.nztourismstrategy.com)

10. As an island nation, oceans policy development is an important aspect in New Zealand's adoption of both sustainable development and management of the marine environment. Having concern for the environment, beyond the 12 mile territorial sea limit, enhances New Zealand's reputation as a responsible world player and careful manager of the activities that occur within it.

#### *Policy Options*

11. TIA supports all four outcomes for managing the EEZ (page 4) and we believe it is essential that the proposed regulations in this Plan safeguard the environment. At the same time, they must also allow for commercial use if such activities are not detrimental to the valuable marine ecosystems within which they operate.
12. In determining the balance between commercial activity and protection of marine biodiversity, we believe it is critical that thorough consultation backed up by sound research is carried out, so the right decisions are made. In this regard, we support the proposal in the legislation for a cost recovery regime to fund research into environmental effects.
13. At first glance, our Association prefers Policy Option 1. We see little value in "reinventing the wheel" and developing an entirely new regulatory regime when existing tools can be modified and refined to adapt to the changing environment. As noted on page 10, with effective regulations already in place for fisheries, maritime transport and safety, filling the gaps in the current EEZ regulation would appear to be the prudent option.
14. As to the actual details of the proposal (pages 12-22), we would be reluctant to endorse a model similar to that of the Resource Management Act (RMA). From the experience of our members, the RMA has been a cumbersome piece of legislation

resulting in lengthy delays and has acted as a disincentive for tourism businesses to invest in new ventures.

15. We believe the decision-making process should be separate from the political process. It should be neither the responsible Minister nor the administering department making decisions. Instead, a much more transparent process would be to rest the decision-making function in an independent body.

## **Conclusion**

16. Our Association supports the thrust of these proposals, provided the improved regulations achieve sustainable management options. It is important that the regulations find the right balance between protecting the marine environment and allowing sustainable economic activities to occur. We would value an opportunity to be involved in further work on these regulations, as well as further work the Ministry may be doing in the development of ocean policy as it aligns with the work already under way with the tourism sector's own strategy.

## **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 \$10.3b 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