

20 September 2019

Department of Conservation
Whare Kaupapa Atawhai / Conservation House
PO Box 10420
Wellington 6143

Via email: nzbs@doc.govt.nz

To whom it may concern:

Te Koiora O Te Koiora / New Zealand Biodiversity Strategy

Thank you for the opportunity to submit on the discussion document for the next New Zealand Biodiversity Strategy. Our feedback below follows on from our March 2019 letter to DOC when we engaged in the early consultation process.

Tourism Industry Aotearoa (TIA) is the peak industry body representing the tourism industry. Our purpose is to shape tourism for the ongoing benefit of Aotearoa and our people. Our vision is 'Leading the world's most sustainable tourism industry / *Kokiritia nga mahi tapoitanga ki te ao*'

Tourism is New Zealand's largest export sector, earning \$16.2 billion in foreign expenditure, contributing 20.6% of New Zealand's total export of goods and services (YE March 2018). Tourism in New Zealand is a \$107 million per day industry, and despite being New Zealand's number one export earner, the visitor economy is in fact dominated by domestic tourism (59% total expenditure). New Zealanders recreating away from their home areas, whether under their own steam or using the support of commercial operators, are a critical part of the tourism industry.

Tourism takes the lead in promoting New Zealand to the world. The brand positioning built by a vibrant tourism industry has become an important source of national confidence and identity and a front window for "Brand New Zealand". Indeed, the unique and pure offering that is synonymous with New Zealand tourism has been widely adopted and used to promote New Zealand exports in a range of other industries as well.

The importance of biodiversity to tourism

We acknowledge that the discussion document recognises the importance of tourism as a vital part of the economy and regional development. Our natural environment plays a key role in the attraction of tourists to New Zealand and how the natural environment is managed is inherently tied to the economic success and well-being of the New Zealand tourism industry.

Tourism is a highly competitive global industry, and the environment is our unique selling point, underpinning the Government's 100% Pure New Zealand marketing proposition. Data from the International Visitor Survey conducted for the Ministry of Business Innovation and Employment (MBIE) shows that the top factor for influencing visitors to

choose New Zealand is our natural landscapes and scenery, while New Zealand's environmentally friendly image is also an important influence.

Top factors influencing consideration of New Zealand (from International Visitor Survey):

1. Spectacular landscapes/natural scenery 46%
2. Always wanted to visit 29%
3. Visit friends/family 28%
4. Friends, family or colleague recommendation 27%
5. Somewhere new/never been there before 25%
6. Environmentally friendly image 21%

TIA's view is that New Zealand has a unique opportunity to show, in a planned and deliberate way, environmental leadership and integrity. Such a move would secure a powerful high-value trading proposition for tourism and many other industries, support our nation's social health and ensure our next generation inherits a land that is better than today.

The environment is integral to many specific adventure and outdoor tourism experiences. However, much of the value of the tourism/environment interface is in landscape/destination attractiveness. Landscapes, mountains, beaches and fresh water are the integral components in the suite of resources that make up 'Destination New Zealand'.

It is in the vested interest of tourism operators that there is a healthy and protected natural environment. There is a range of exemplars where the commercial sector has invested heavily to protect that environment. Canopy Tours in Rotorua, the winner of the New Zealand Supreme Tourism Award in 2016, is a strong example of where public and private partnerships are a win for the environment, for DOC and for the industry. There are also many others that are less well known, and more still who want to better support conservation but are unsure on how or what to do. TIA is supporting a "Making Conservation easy to see and do" pilot that is getting underway in Canterbury.

Tourism provides a means for people to enjoy our environmental resources and to monetise value from these resources. The wealth-generating capacity of the New Zealand system will be enhanced from ensuring quality environmental resources.

Tourism accrues economic value from largely non-extractive use of environmental resources. This value is often less tangible to measure than that from industries based on extractive use (such as mining, irrigation or forestry), however the value ultimately achieved is just as real to the New Zealand economy.

The Tourism New Zealand marketing proposition '100% Pure New Zealand' is a composite of our regions or destinations. The pay-back for the regions are jobs, business opportunities, and vibrant and functional communities. This is especially so for regions where there are otherwise fewer opportunities for growth. As such, how regions manage their environmental resources for tourism is very important and needs to be factored into all resource use and management decisions.

Specific comments

Framework

TIA is supportive of the proposed strategy framework. We do have a series of recommendations, provided below:

- a. The Empower outcome Connect + Value could be strengthened by the addition of a reference to international visitors. From the tourism perspective domestic and international visitors should connect with nature, and tourism businesses are well placed to facilitate this through making conservation easy to experience. The strategy has a strong focus on New Zealanders and their role in nature but is mainly silent on international visitors – both from the value they gain from their interaction with nature and how they might contribute to achievement of the Strategy’s goals.
- b. We recommend that the Goals (Section 2.5) are revisited in terms of priority and urgency. There is no prioritisation of the list of 25 goals, other than its grouping under the timeframes of By 2025, 2030, or 2050.
- c. It is very positive to see businesses acknowledged as a stakeholder throughout the strategy and we note that one of the goals under the 2050 timeframe is that ‘Every business is helping to restore nature’. We recommend there should be interim goals in 2025 and 2030 to support this aspiration. The Tourism Sustainability Commitment can play a key role in this.
- d. There is no action plan outlining how Goals might be achieved. If there is a connection between Goals and the Priority Actions under each of the five Shifts this should be identified. If there isn’t, then consideration should be given to identifying the key actions to achieve the Goals.
- e. Page 14 outlines a series of key pressures on biodiversity. It would be useful to identify which of these are the more serious pressures, or are the pressures listed all equal? This would help focus the document on the most important issues, as a clearer priority of risk would usefully frame the importance of this work.

The Shifts

Shift 1 – Getting the System Right: We support this Shift and agree with its importance.

Shift 2 – Empowering kaitiakitanga and mātauranga Māori: We support the focus of this Shift.

Shift 3 – Communities are empowered to take action: As mentioned above it’s important there are statements that recognise the importance of restoring and growing conservation/nature, and we support the focus on enabling businesses to act.

Shift 4 – Connecting ecosystems from the mountain tops to the ocean depths: We support this focus. Natural landscapes are very important to the tourism offering in NZ and we recommend a statement to this effect within the Shift.

Shift 5 – Innovating for the future: We support this Shift and agree with its importance.

Landscape scale biodiversity

In our previous letter we highlighted the need for the strategy to acknowledge the current challenge of managing biodiversity at a landscape level and commit to developing fit for purpose regulatory systems.

We acknowledge the inclusion of two priority actions under Shift 4 focused on landscape scale biodiversity:

"Establish landscape scale projects that are defensible against predator reinvasion. For example, connecting project boundaries to the sea, major rivers, high

mountains or other features which increase the ability to prevent predators reinvading or recruiting from within a site. (Short term: Y1-2)”

“Ensure regional biodiversity strategies include a focus on integrated catchment (including receiving environments) and landscape scale biodiversity planning. (Medium term: Y3-4)”

We would welcome more detail and the opportunity to provide input on what this will actually look like.

Conservation partners

While the biodiversity strategy is a government document it should not be confined to government action. Rather it should lead to a concerted push to ignite a groundswell of action and long-term behaviour change within New Zealand.

We welcome the strong emphasis on how non-government partners such as councils, land owners, NGOs, community groups, businesses, the New Zealand public and other partners that have an interest in managing and enhancing biodiversity can be part of the solution.

We also acknowledge the inclusion of our Tourism Sustainability Commitment (TSC) as a case study, which aims to see every New Zealand tourism business committed to sustainability by 2025, supporting our vision of leading the world’s most sustainable tourism industry. Driving the focus on environmental sustainability is the commitment that tourism is recognised for its contribution to protecting, restoring and enhancing New Zealand’s natural environment and biodiversity. This is supported by industry goals that ‘Tourism businesses actively support and champion ecological restoration initiatives’ and ‘Tourism businesses are measuring, managing and minimising their environmental footprint’.

Since our March letter we have had more than 300 further tourism operators sign up to the TSC, bringing the total to 1220.

DOC’s Commercial Partnerships Group and business engagement

The work of this group, responsible for driving growth in conservation through partnerships, is unique and important. Many tourism operators are keen to be involved with conservation work, but do not know what to do and/or how to do this.

Enabling businesses to take action is critical to achieving the ‘all-in approach’ that is needed to make real change. In TIA’s opinion, this should be one of the key focus areas of the Strategy.

Additional Concerns

TIA attended the regional workshop in Wellington to discuss the draft Strategy. While we appreciate there is a wide range of views regarding how we maintain New Zealand’s biodiversity, we are concerned that some parties see the maintenance of biodiversity in conflict with access to the DOC estate. We strongly disagree on this point. It is entirely possible and appropriate to use people’s desire to experience nature to help protect and enhance that nature. Access to public conservation land is vital to both conservation and to people’s health and wellbeing.

We also noted a specific emphasis from participants in the workshop on New Zealand’s indigenous species. There is no doubt that caring for our indigenous species is important, and these unique species are often a strong drawcard for tourism. However, some of our non-indigenous species also play a key role in attracting tourism to New Zealand,

especially for those in the hunting and fishing sectors. We would caution DOC against making moves that do not recognise the importance of these introduced species to our economy.

Next steps

We are supportive of the direction outlined in the discussion document. As always, we look forward to seeing more specific actions outlined, as it specifically relates to our members being able to operate on the DOC estate.

TIA wishes to participate further in the development of the biodiversity strategy. Please do not hesitate to contact us if you have any queries about our feedback.

Ngā mihi nui,

A handwritten signature in black ink, appearing to read 'C. Roberts', written in a cursive style.

Chris Roberts
Chief Executive
Tourism Industry Aotearoa