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He Kura Koiora i hokia: Discussion Document on proposed National Policy Statement on Indigenous Biodiversity

To whom it may concern:

Tourism Industry Aotearoa (TIA) welcomes the opportunity to comment on He Kura Koiora i hokia: Discussion Document on proposed National Policy Statement on Indigenous Biodiversity.

TIA is the peak body for the tourism industry in New Zealand. With over 1,600 members, TIA represents a range of tourism-related activities including hospitality, accommodation, adventure & other activities, attractions, retail, airports & airlines, transport, as well as related tourism services. 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.

TIA is supportive of the proposals in the Discussion Document and the proposed National Policy Statement. We agree that New Zealand's indigenous biodiversity (IB) is a unique proposition and should be cared for and stewarded in line with the principles of kaitiakitanga.

We would like to take the opportunity to reiterate the importance of biodiversity tourism, and that tourism is a partner in managing our natural resources well.

Section C: Managing adverse effects on biodiversity from activities

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.

New Zealand nature is at the heart of our industry and tourism is a partner in managing our natural resources well. Tourism is uniquely positioned as a non-extractive industry which monetises our biodiversity while providing a critical connection between people and our unique flora and fauna. While much of the interaction between Tourism and our IB occurs on conservation land, it is by no means all. We are also very aware of the importance of IB on private land in supporting our nature within conservation areas.

The NPS necessarily focuses on managing adverse effects, however it is important to recognise the above in its contextual statements – achieving the outcomes of the NPS will be better supported by an increased awareness that tourism is an industry which connects people with, and monetises our IB without creating adverse effects on IB values themselves. There is some recognition of this in the discussion document, however it should be included in the NPS itself and should better reflect the specific points made above.

We are broadly supportive of the efforts to manage adverse effects on IB from activities conducted within Significant Natural Areas (SNAs). We do however suggest the objectives of the National Policy Statement for Indigenous Biodiversity (NPSIB) anchor more strongly in restoring and enhancing our IB, rather than merely maintaining the status quo. The content of the NPS seems to reflect this – however, the objectives do not.

Tourism accrues economic value from largely non-extractive use of environmental resources. In fact, 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.

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.

Specific comments on the NPS

NPS 1.7 (3): Currently the NPS rests too heavily on the 'at least no reduction' statement – it should be mentioned that restoration or enhancement of IB is enhanced where business is involved in a SNA.

NPS 2.1: Objective 1 should be integrated with Objective 5, with "Restore and enhance" emphasized rather than "maintain". The content of the NPS seems to reflect this, however the objectives are blurry.

NPS 3.5: Strongly support the NPS inclusion of resilience climate change.

NPS 3.7: "Business" should be included as a relevant stakeholder in the points (as makes sense to do so).

NPS 3.8 (2) a): "Businesses" should be included in the partnership statement.

NPS 3.9 (4): Particularly support points a, b, d. These points are very important for tourism businesses who often put considerable effort in to restoring indigenous biodiversity in or near the areas where they work, and have faced frustrating barriers to this work (point a) or subsequent barriers after having restored areas (point d).

Other comments

While we recognise the importance of indigenous biodiversity, it's also important not to lose sight of the value of some of our introduced species.

Hunting and fishing add much value to the New Zealand tourism industry. The species being targeted are part of these activities are introduced.

For example, sports fishing is an important economic activity to the New Zealand tourism industry. Domestic travellers will take over 1.8m trips per annum to participate in freshwater fishing, with 1.1m of these being day trips, and the other 700,000 being overnight.¹ Guided angling, usually for international visitors, is also significant with New Zealand having an international reputation for trout and salmon fishing. The New Zealand Professional Fishing Guides Association notes that the spend for guided angling ranges from \$1100 to \$3750 per day and includes guiding and other services such as accommodation, dining and travel. Regional dispersal is an ongoing challenge for the tourism industry, getting more visitors both international and domestic to visit outside of Auckland, Wellington, Christchurch and Otago.

¹ <https://www.dgit.nz/>

Freshwater fishing by its very nature often takes fishers into the regions, outside of the main cities.

While first and foremost we must care for our indigenous biodiversity, TIA would also urge caution around discounting the value of introduced species to the New Zealand economy.

Next steps

We are supportive of the direction outlined in the discussion document. As always, we look forward to seeing more comment included relating to the value our members can bring through connecting people with our indigenous biodiversity while providing economic benefit to our communities via non-extractive business.

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

Ngā mihi,

A handwritten signature in black ink, appearing to read 'S. m. Hanrahan', with a stylized, flowing script.

Steve Hanrahan

Advocacy Manager

Tourism Industry Aotearoa