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Thank you for the opportunity to provide feedback on *He Āhurutanga Taiao: Draft Tourism Environment Action Plan*.¹

It is now three and a half years since Covid-19 emerged, borders closed and international tourism ground to a halt. In the space of days, New Zealand went from welcoming several hundred thousand visitors a month to welcoming virtually nobody.

Covid-19 has had wide ranging and differing effects on New Zealand's tourism sector. For operators reliant on international visitation, the pandemic has created hardship and, in many cases, forced difficult decisions about whether to continue operating. For domestic tourists, the pandemic raised the prospect of visiting some of New Zealand's most spectacular natural attractions in the relative absence of congestion, noise and other tourists.

The pause created by Covid-19 led many to call for a 'reset' that would place the industry on a more sustainable footing. The fact that so many operators did so suggests that this was more than making a virtue of necessity – there was a real apprehension that business as usual was neither palatable nor environmentally sustainable.

Some modest progress has been made. We now have tougher rules around freedom camping. Changes to the Civil Aviation Act 1990 have improved the Department of Conservation's ability to advocate for restrictions on overflights in the interests of noise reduction. And central government investment has enabled the creation of destination management plans in all 31 regional tourism destinations. Whether we needed a pandemic to shake loose these initiatives is a moot point.

But many of the most challenging environmental issues associated with New Zealand's pre-pandemic tourism offering remain unresolved. Little progress has been made on how to reduce the carbon footprint of flying tourists to and from New Zealand. There is also little consensus about how to ensure visitation remains within the carrying capacity of our most popular natural attractions.

The Tourism Environment Action Plan offers an opportunity to tackle these and other environmental issues. It represents the most recent in a series of thinkpieces looking at how New Zealand's tourism industry could be reshaped in the wake of Covid. In some ways, it is also the most important.

¹ MBIE, 2023. <https://www.mbie.govt.nz/dmsdocument/26809-consultation-document-draft-tourism-environment-action-plan-pdf>. Wellington: Ministry of Business, Innovation and Employment.

To briefly recap. Several months into the pandemic, the Minister of Tourism established the Tourism Futures Taskforce to identify the changes needed to create a more sustainable, productive and inclusive tourism sector. That taskforce published an interim report in December 2020, but was de-funded before it could issue a final set of recommendations.

In May 2021, the minister announced the creation of an industry transformation plan process for tourism. This was to pick up where the Tourism Futures Taskforce (and my) reports had left off and develop a plan for how to build something called a 'regenerative' tourism system in New Zealand. The draft Tourism Environment Action Plan represents the culmination of three years' collective work on how to reset tourism for the better.

We should be in no doubt that reducing tourism's environmental footprint will involve sometimes difficult trade-offs. The role of a leadership group of the type assembled is not to steer away from those, but rather to collate the evidence and options in a way that helps decision makers decide how to proceed. In the introduction to *Not 100% – but four steps closer to sustainable tourism*, I observed that "maintaining a constant flow of high level, aspirational objectives is getting in the way" of the kinds of changes required.² If we are serious about fundamental change, then it is important that we do not keep on avoiding difficult conversations about some of the pressures that manifestly undermine claims about sustainability.

As I detail in this submission, I think the Tourism Environment Leadership Group should park the aspirational language and become much more forensic about the issues it thinks should be prioritised, and more specific about where it thinks the solutions lie. I look forward to seeing progress in both those areas as the plan is finalised.

1. The focus on regenerative tourism and the concept of 'giving back' detracts from issues that deserve more attention.

The Draft Tourism Environment Action Plan adopts 'regenerative tourism' as its overarching objective. It also sets out a mission statement – "to empower the tourism industry to help to restore the mauri of our climate and environment by swiftly achieving carbon zero targets and embracing a regenerative and adaptive approach."³ A set of six principles has also been developed. These range from "caring for the whenua is the first priority" to "we are not the centre of the universe but we are part of it".⁴

I have been critical in the past of the time and effort the tourism sector dedicates to the creation of high-level aspirational statements and strategies such as these. In my view, they tend to become a substitute for more serious conversations about the various trade-offs associated with tourism. It is worth noting that the goals, mission statement and principles put forward in the draft action plan bear little resemblance to those in other recent tourism thinkpieces.⁵ I think it is reasonable to ask whether the time spent developing this new scaffolding might have been better spent fleshing out the detail of the plan (see point two below).

² PCE, 2021. *Not 100% – but four steps closer to sustainable tourism*. Wellington: Parliamentary Commissioner for the Environment. <https://pce.parliament.nz/publications/not-100-but-four-steps-closer-to-sustainable-tourism>.

³ MBIE, 2023, p.14.

⁴ MBIE, 2023, p.10.

⁵ For example, the *New Zealand-Aotearoa Government Tourism Strategy*, the Tourism Futures Taskforce interim report *We are Aotearoa*, or *Not 100%*.

The focus on regeneration in the draft plan also represents a continued shift away from merely seeking to reduce the negative environmental effects of tourism. Instead, the goal has become one where tourism actually *improves* overall environmental and social outcomes.⁶ Much of the content on regenerative tourism centres on the role that tourism operators – and tourists themselves – can play in improving biodiversity outcomes. For example, the second Tirohanga Hou – “Tourism champions biodiversity” – describes New Zealand’s biodiversity crisis and sets out how tourism operators could be encouraged to participate more widely in conservation efforts.

Planting and pest control initiatives make a positive contribution to the communities in which they are located, and private sector contributions – financial or otherwise – will always be welcome. However, any such contributions should not be confused with the need to address the day-to-day environmental impact of a firm’s operations. Tourism operators bear little responsibility for New Zealand’s biodiversity crisis. But they are responsible for a range of other environmental pressures – heightened biosecurity risk, congestion, noise – that have received little attention in the draft plan.

One issue I would like to see prioritised in the final plan is cruise tourism. As far as I am aware, the environmental and biosecurity risks associated with cruise ships have yet to be systematically evaluated. Given the increasing popularity of this mode of travel, this is something that requires urgent attention.

2. The draft plan is short on detail, which makes it difficult to assess the merits of the actions proposed.

The scope for the Tourism Environment Leadership Group emphasises that sustainable tourism has been the subject of “extensive analysis, consultation and collaboration.” As such, the environment phase of the Tourism Industry Transformation Plan is intended to be an opportunity to “focus on actions required to deliver systemic change, rather than producing another stocktake of issues and challenges for the tourism sector.”⁷

In my view, the draft action plan fails to meet that objective. While it does identify 22 actions that could help foster a shift towards a more regenerative tourism sector, many of these amount to little more than calls for more work, or are so vague or short on detail that their substance is unclear.

Consider two examples from the first Tirohanga Hou of the draft plan – “Tourism journeys are decarbonised”.⁸

The first action proposed in this area is to create a Tourism Decarbonisation Roadmap, which, among other things, would establish emissions reductions targets and identify actions that could be taken to achieve them. Given already existing work, this is surely exactly the sort of exercise that the Tourism Environment Leadership Group could have undertaken.

⁶ As the plan puts it, “A truly regenerative tourism system will increase the mauri of our land, climate and people; and in doing so, support abundance for Aotearoa New Zealand’s diverse communities, the visitors that we host, and our economy.” MBIE, 2023, p.14.

⁷ MBIE, 2022. Tourism Industry Transformation Plan: Te Taiao / The Environment phase – Scope. <https://www.mbie.govt.nz/assets/tourism-itp-environment-scope-october-2022.pdf>.

⁸ MBIE, 2023, p.36.

The second action proposed in this area – “rapidly invest in low-carbon technologies to enable long-haul air and cruise travel” – is more specific. That said, the plan fails to delve much deeper in terms of how such investment might be organised. The leadership group offers support for existing government initiatives, such as co-funding a feasibility study into domestic production of sustainable aviation fuel. But actions beyond that are left to further work (via the Tourism Decarbonisation Roadmap) and/or feedback from industry associations or the public.

This generality is apparently intentional. According to the authors, “the Tirohanga Hou, and the actions that sit under each one, are deliberately light on details of implementation ... as we want to allow space for others to shape the ideas and direction of this plan”.⁹ This falls short of what might be expected from a leadership group working in an area as well studied as tourism sustainability. While consultation is vitally important, it is hard to provide meaningful feedback on policy options that are as general as those proposed. To give an example, few people would disagree with the need to invest in decarbonising long-haul travel. But it is the ‘how’ and ‘who’ of that decarbonisation which is challenging – and where leadership is critically required.

Perhaps most strikingly, there is little evidence to suggest that the leadership group has grappled with several recent assessments of the policy options available for decarbonising international air travel.¹⁰ I have, for instance, proposed levying a departure tax on every person leaving New Zealand, with the proceeds used to leverage global efforts to find solutions. The proposal is concrete and confronts the fact that travellers should have to bear the costs of their actions. I would have expected a *leadership* group to have examined this and other proposals and either adopt some or explain why better options should be pursued.

3. The carrying capacity of popular tourism destinations is defined too narrowly.

The fourth Tirohanga Hou of the draft plan – “Visitor management is optimised for te taiao” – focuses on the place-based pressures that tourism activity creates. Importantly, it acknowledges that in some cases, visitor numbers will need to be capped to remain within the carrying capacity of certain sites.

I commend the leadership group for making that explicit. All too often there has been a tendency to respond to demand growth by simply building more infrastructure – car parks, walking tracks, toilets, wharves, etc. That can be expensive and, by fostering more visitation, risks undermining the qualities that made the site special in the first place.

Having said that, I would question the way that carrying capacity has been defined. The draft action plan appears to take a very narrow view of this concept, effectively excluding issues relating to congestion, noise, visual pollution, and the loss of wildness and natural quiet that can result. The logic for this originates in the scope for the environmental phase of the Tourism Industry Transformation Plan, which states:

“It [the environment action plan] will not focus specifically on issues related to

⁹ MBIE, 2023, p.34.

¹⁰ Tourism Futures Taskforce, 2020, <https://www.mbie.govt.nz/assets/the-tourism-futures-taskforce-interim-report-december-2020.pdf>; PCE, 2021; Air New Zealand, 2021, Sustainable Aviation Fuel, <https://p-airnz.com/cms/assets/PDFs/Airnz-sustainable-aviation-fuel-in-new-zealand-may-2021.pdf>; Callister and McLachlan, 2023, Policy Quarterly: Decarbonising Aotearoa New Zealand’s aviation sector, <https://ojs.victoria.ac.nz/pq/issue/view/892/87>.

congestion or the loss of natural quiet which may be caused by tourism activity and can in some instances negatively impact the visitor experience and social licence for tourism. Although these issues are important, they are not, strictly speaking, environmental issues.”

As I stated in *Not 100%*, noise and congestion are pollutants like any other. They detract from the quality of the natural environment just as nutrient run-off from pastoral farming does. In both cases, there are consequences in terms of human experience of the environment. And in both cases, there are consequences in term of ecosystem health. We know very little about the effect of noise from motorised transport on marine mammals or birds, for example.

I am surprised that the Ministry of Business, Innovation and Employment and the Tourism Environment Leadership Group have effectively defined away some of the core pressures tourism imposes. I would strongly encourage the leadership group to adopt a definition of carrying capacity that explicitly includes the ability of sites to cope with noise and congestion. Even if the industry does not believe these pressures are ‘environmental’ visitors certainly do.

Yours sincerely

A handwritten signature in black ink, consisting of a series of connected loops and lines, appearing to be the name 'Simon Upton'.

Simon Upton

Parliamentary Commissioner for the Environment
Te Kaitiaki Taiao a Te Whare Pāremata