



tourism
INDUSTRY

ASSOCIATION NEW ZEALAND

Submission to the

Ministry for the Environment

on the

**Proposed National Policy Statement on Indigenous
Biodiversity**

2 May 2011

Comment

1. The need to protect and preserve New Zealand's green, clean image has been a constant theme expressed by TIA members. Whether by accident or design, New Zealand has carved out this image based on a landscape with wide open spaces, and a pristine and unspoilt environment. Any future damage to this position e.g. through the ongoing loss of indigenous biodiversity holds very real risks to the perception of NZ as a nation that is environmentally conscious, and consequently a range of industries including tourism
2. However, while our Association supports urgent action to arrest the decline in indigenous biodiversity, our submission aims to explore a range of issue relating to the effectiveness of this NPS to actually make a difference on the ground
3. TIA believes that the name given to the proposed National Policy Statement (NPS) is misleading. The exclusion from the NPS of over one third of New Zealand's land mass (Public Conservation Land), together with the marine coastal area makes the title of 'National' Policy Statement appear broader in scope than is the case. In reality, it is designed to assist local authorities deal with biodiversity issues on private land.
4. Given the limited scope of the proposed NPS, we are anxious that it is compatible and aligned with other relevant NPS's, Department of Conservation legislation and the Coastal Policy Statement. Ecosystems don't respect boundaries and the strength of the NPS will be integrally linked with the management of adjoining lands that fall under different management regimes.
5. From a strategic perspective, TIA is concerned that the proposed NPS and other national planning tools are not underpinned by a clear, agreed vision for New Zealand – meaning planning and policy tools are not created with a strong sense of common purpose and direction. New Zealand needs to develop a clear set of operating principles that collectively will deliver economic, social and environmental wellbeing for this and future generations.
6. Producing an NPS was a key recommendation from the 2000 Biodiversity Strategy and intended to be complete by 2003. It is of great concern that it has taken at least 10 years to reach this stage and may not even be recognised in regional plans for five years after the NPS comes into force. Given the strong language used in the accompanying NPS preamble, pointing out the urgent need to arrest the loss of biodiversity, it is hard to reconcile the time it has taken to get this far.
7. TIA is concerned that the clarity, support and encouragement intended for local authorities, may not be met by this NPS and we question whether an NPS is even the correct means for achieving these outcomes. Rather than create yet another planning document to compensate for lack of guidance within the Resource Management Act (RMA), it may make more sense to change the Act itself. It appears that the proposed NPS still leaves lots of room for different interpretation which brings into question its value.
8. The Association notes that within 3. *Interpretation* - the term 'significance' is not defined and feel this needs to be addressed given its use in the proposed NPS and its importance to planning at a local level. It appears that interpretation of 'significance' has been the cause of tension and inconsistent planning approaches for some time.

9. Policy 5 (d) refers to biodiversity offsetting. Biodiversity offsetting is in its development phase and needs much work before it can be called upon as a reliable, consistent and accurate means of ensuring 'no net loss'. Given that modelling for biodiversity offsetting is in its infancy and has yet to gain widespread support and understanding as a conservation tool, TIA is worried about its prominence within the proposed NPS. We think greater emphasis should be placed on a, b and c of Policy 5.
10. TIA is very concerned that the proposed NPS is using the Section 46a process which removes the Board of Enquiry and appears to truncate and weaken the democratic process. Our Association believes it is very important that key stakeholders like Councils are given additional opportunities to shape the document, given that it is being developed primarily for their use.

Background

Delivering Value

11. Tourism is big business for New Zealand as the country's second largest export sector. It is a major contributor to the New Zealand economy that will always be here – and won't easily go offshore. Tourism takes the lead in promoting New Zealand to the world. Thanks to our 100% pure positioning, New Zealand is recognised as one of the most beautiful, unspoiled and scenic places on earth. 100% Pure signifies pride in our country, pride in our people and culture, and pride in the unique environment and experiences that New Zealand offers.
12. 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 clean, green, pure offer 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.
13. If New Zealand Inc. is to continue to prosper, to attract investment and to raise its position in OECD rankings, then it is vital the tourism industry, and the positive image it projects, remain strong.
14. Below is a snapshot of the economic value provided by tourism to the New Zealand economy:
 - Tourism contributes more than 8.7% of gross domestic product (GDP) for New Zealand as well as directly and indirectly employing one in ten New Zealanders.
 - Tourism in New Zealand is a \$61 million per day industry. The New Zealand tourism industry delivers \$26 million in foreign exchange to the New Zealand economy each day of the year. Domestic tourism contributes another \$35 million in economic activity every day.
 - Tourism expenditure reached \$22.4 billion for the year ended March 2010. International visitor expenditure accounted for \$9.5 billion or 18.2% of New Zealand's foreign exchange earnings.

- Importantly, and despite more challenging times in the past three years, tourism is again New Zealand's largest foreign exchange earner with its contribution felt at national, regional and local levels.

About TIA

15. TIA has been the lead association that represents the interests of about 1,700 tourism businesses in New Zealand. The Association was first established in 1955 and the businesses TIA represent cover a range of tourism-related activities – hospitality, transport, accommodation, adventure and activities, attractions and retail as well as related tourism services.
16. The primary role of TIA is to be the voice of the tourism industry. This includes working for members on advocacy, policy, communication, events and membership and business services. The TIA team is based in Wellington and led by Chief Executive Tim Cossar.

Geoff Ensor
Advocacy Manager
2 May 2011