

20 June 2017

By email

Department of Conservation
PO Box 10 420
Wellington 6143

Re: draft New Zealand's Threatened Species Strategy

Dear Sir, Madam,

Tourism Industry Aotearoa (TIA) is the peak industry body representing the tourism industry. We welcome the opportunity to comment on the draft Threatened Species Strategy.

Tourism 2025 (www.tourism2025.org.nz), an industry-led, government supported growth framework was launched in New Zealand in 2014 and has set an aspirational goal of reaching \$41 billion in annual tourism revenue by 2025. The industry's focus is on growing value faster than volume. The Tourism 2025 Growth Framework is based around five key themes: Insight, Connectivity, Productivity, Visitor Experience and Target for Value. This framework was refreshed in 2016, refer ([Tourism 2025 - two years on](#)).

While the five themes of the framework remain unchanged, the emphasis in some focus areas has shifted. Sustainability is one of the themes now being given greater emphasis. There is a desire and expectation that long term economic, environmental, cultural, and social sustainability becomes a core value against which all decisions are being tested.

Tourism recognises the need for a Threatened Species Strategy.

To ensure a sustainable future, the New Zealand tourism industry must ensure it is demonstrably committed to looking after all the resources it uses to operate. Sustainability must become a genuine ethical underpinning of the industry.

The New Zealand tourism industry is highly reliant on the environment in which visitors immerse themselves, whether this is air and water quality, forests, wildlife, or urban environments. The quality of how we manage our environment is inherently tied to the performance of the tourism industry in the minds of our visitors. As such, tourism must champion the interests of our environment through its own conduct and by being a powerful voice in New Zealand's overall management of its environmental assets. For example, there are genuine gains for tourism if we are looking after our endangered species and managing native landscapes e.g. through weed control, pest control, advocating for sustainable use, etc.

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Strategic Partners
supporting TIA and the
tourism industry



We are pleased to see that there is a strong linkage of this strategy with other key initiatives such as Predator Free 2050 and Battle for the Birds. The approach feels coherent and mutually supporting. However, TIA is questioning though whether the recommendations from the Parliamentary Commissioner for the Environment's report '*Taonga of an Island Nation: Saving New Zealand's Birds*' have been taken on board, particularly the recommendations around feral cats and around having a Plan of Action.

Conservation partners

Although we understand that the draft Threatened Species Strategy is a Government – DOC document, we are of the opinion that this strategy is unnecessarily confined to DOC. There should be greater 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 working for conservation, can be part of the solution. What action could these partners undertake to support this initiative? It is unclear to us how this strategy will lead to a concerted push to ignite a groundswell of action and long term behaviour change within New Zealand.

It is disappointing that the draft strategy does not refer to the very positive contribution of tourism as a conservation partner. Neither does it mention the great potential to harness industries such as tourism to drive the strategy and to play important roles in the strategy's implementation. Examples of what this could look like for the tourism industry include: support of DOC programmes; adopting local or regional restoration projects; articulating the value of nature as a resource to be protected; and by playing a vital role in educating New Zealanders and people from around the world about the special nature we are restoring.

DOC's Commercial Partnerships Group

TIA was surprised to see that the draft Strategy does not refer to DOC's Commercial Partnerships Group. 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 in 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 this draft Strategy.

Comments on specific sections

Page 3

In the section '*... the clear species goals set out in this Strategy will also guide decisions by...*' should include 'businesses, including tourism businesses' as one of the bullet points.

The four Predator Free 2025-2050 goals are listed, and on page 5 the four Threatened Species goals are listed. These are different but related, and this is a little confusing for the reader. The flow from the Predator Free 2025 goals to the Threatened Species goals needs to be clearer.

The priorities in this Strategy should guide the strategies of other government departments including MPI.

Page 4

Second paragraph of 'Vision' - 'businesses, including tourism businesses' should be included (this applies throughout the document).

Under Focus, it is good to see 'Working Together in Partnerships', but this aspect is not built upon sufficiently through the rest of the document, especially from a tourism perspective.

Page 9

As noted, the priorities in this Strategy should guide the strategies of other government departments including MPI. This also means that government decisions need to align with this Threatened Species strategy. For example, granting consent for the water take through the Kiwi sanctuary south of Haast is out of step with this strategy.

TIA would like to see evidence that government strategies and decisions will be aligned with this Threatened Species strategy.

Page 10

This section should include a section on the value of nature to tourism – species, landscapes, impact of wilding pines etc. Ecological degradation is a big downside for the tourism industry. Conversely, doing well has a big upside.

Page 12

The figure on the number of Threatened Species seems to be incorrect. For instance, there are five bat species, three are threatened and one is data deficient. This means the orange bar should cover 60% of the bar, and 'data deficient' 20%. Same for marine mammals, so it might be a method issues.

Page 15

This is a good example of partnering with Fonterra. An example of the valuable role of a tourism partnership would strengthen the document. Air New Zealand would be a good example at a national level. There are also many regional and local examples to choose from.

Page 17

Again, should include 'businesses, including tourism businesses' in the sentence on partners.

Page 20

The Right Tools for the Job - this section would really benefit from examples of the role businesses and/or communities could adopt or local challenges they could take on.

Page 32

Again, there is real opportunity to highlight the positive role tourism is, and can, play as a partner in this section.

Section 'Managing ecosystems at scale to protect species' – The McKenzie Basin is a great example of the need to align this Threatened Species strategy with government oversight of the needs of threatened ecosystems. We suggest this example is included in the document.

Page 35

TIA supports the funding for science, but as noted in our [submission on the Conservation and Environment Roadmap](#), we are concerned that tourism is completely absent from any of the science initiatives within the 12 themes. As such, this Roadmap completely misses the stakeholder interest of the tourism industry and the government institutions that support tourism on how New Zealand manages its conservation and environmental resources, even though research consistently finds that these values are the very reason why people visit New Zealand.

Page 39

Section 'Working together in partnerships' – working with businesses should have a stronger focus here, including highlighting the work of DOC's Commercial Partnerships Group in enabling businesses to grow conservation.

Page 40

There should be an Action included in this section enabling the New Zealand public, including businesses, to take action to support this Strategy – a concerted push to ignite a groundswell of action and long term behaviour change in everyday New Zealanders.

Conclusion

TIA supports the development of a Threatened Species Strategy but is concerned the current draft is deficient in several areas. There are genuine gains for tourism if we are looking after our endangered species and managing natural landscapes. Successful outcomes from this strategy are very important to tourism sustainability. We are of the opinion that the strategy should have a stronger focus on working together in partnerships with tourism operators.

TIA wishes to participate further in any follow-up process, including any formal meetings and hearings, to ensure that the needs of the tourism industry and the potential impacts on tourism are adequately represented in the draft Threatened Species Strategy.

Please do not hesitate to contact us if you have any queries about our feedback.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. M. Hanrahan', with a stylized, wavy flourish at the end.

Steve Hanrahan
Advocacy Manager - Tourism Industry Aotearoa

