



**Tourism
Industry
Association
New Zealand**

Tourism Industry Association New Zealand

Comments to the

Biosecurity Strategy Development Team

**on the
Draft Biosecurity Strategy for New Zealand**

February 2003

About Our Association and Industry

The Tourism Industry Association New Zealand (TIANZ) represents the interests of over 3,500 businesses in the tourism industry.

Tourism is a \$15 billion industry and generates 13% of New Zealand's exports. The tourism industry employs 1 in 10 New Zealanders in a diverse range of businesses – the majority of which are small and medium sized enterprises. Not only is tourism important because of its size. It is also:

- Highly employment intensive;
- Regionally dispersed;
- Has the flexibility to change its target markets quickly as conditions change;
- Can offer a good return on investment.

The tourism industry in New Zealand consists of more than 15,000 small and medium sized businesses. Of these businesses, most employ less than five people.

New Zealand welcomes almost two million overseas visitors to its shores every year. The domestic tourism industry is also important in helping to sustain a vibrant tourism industry. TIANZ estimates that over 75 million visitor nights are spent by New Zealanders every year.

TIANZ welcomes the opportunity to comment on this draft strategy and to making an ongoing contribution to discussions on biosecurity.

This submission comments on the issues raised in the Developing a draft Biosecurity Strategy for New Zealand, as they relate to the tourism industry, including:

- Some overview comments on the draft Strategy
- Page-by-page comments on the comments of the draft Strategy
- Concluding remarks.

Tourism and Biosecurity

The level of biosecurity in New Zealand is important to the on-going sustainability of our tourism industry. As well as being a significant user of New Zealand's natural and physical resources, the tourism industry directly benefits from a high level of environmental quality and biodiversity. Unsustainable or damaging behaviour to our environment has the potential to cause disruption to our industry.

Tourism can play a role in helping to sustain the environment, through initiatives such as undertaking research and development into sustainable environments, and the Global Green 21 initiative that encourages environmentally friendly tourism business practices.

In a nutshell, the environment sustains tourism and tourism must ensure that it helps sustain the environment.

At the same time, the tourism industry is made up of businesses. These businesses are competing in a competitive market. Therefore, the issue of compliance costs is important to our industry.

Overall, TIANZ supports sound biosecurity policies that manage and minimise risks to New Zealand's environment while keeping compliance costs to a minimum.

General Remarks

In general, TIANZ is supportive of the draft Strategy that is evolving in response to feedback on the earlier issues paper, and the other activities that formed part of the Biosecurity Team's consultation process.

In particular, we note the following changes that TIANZ itself supported in its submission to the Biosecurity Issues paper (February 2002):

- A movement towards the establishment of lead agencies that are empowered to take responsibility for managing biosecurity systems in New Zealand
- More effective risk management
- The greater prioritisation of resources
- A stronger emphasis on public relations and education
- Improved evaluation of initiatives
- The initiation of discussions about the funding of initiatives, and the myriad of issues that fall out of such discussions.

Overall, it is clear that the Biosecurity Team has noted the views of key stakeholders and this is reflected in the contents of the draft Strategy and the discussions that back them up.

In this next section we comment on each of the recommendations in the draft Strategy.

Comments on the draft Strategy Recommendations

1. Designating MAF and MFish as lead agencies for terrestrial (including freshwater) and marine biosecurity respectively

2. Giving lead biosecurity agencies overall accountability and capabilities for developing and maintaining biosecurity systems from pre-border to initial incursions response.

TIANZ strongly supports these recommendations and we believe this will result in greater accountability, better biosecurity protection and better co-ordination of activities.

3. The appointment of a Biosecurity Advisory Board

TIANZ believes this would be a very positive step and would enable stakeholders to be fully involved in the strategic direction of New Zealand's biosecurity policies.

The tourism industry is a critical stakeholder and should be involved on this Advisory Board. MAF will need to carefully ensure that all key stakeholders are able to be involved on this Board.

4. Maori representation on the MAF Biosecurity Advisory Board

TIANZ accepts the need for such representation, especially given the responsibilities lead agencies will have under the Treaty of Waitangi.

5. Biosecurity Council be re-configured as a stakeholder body

While we recognise that this proposal is intended to enhance the opportunities for consultation with key stakeholders, we are concerned that this council would sit uneasily with the Advisory Board proposed in recommendation three. Further to this, there would be a danger that the Council would become a second-tier group with no 'teeth' in comparison with the Advisory Board. We are also concerned that having two groups potentially creates a situation where some stakeholders are more fully involved than others, and have access to higher levels of information and a greater ability to influence decision-making. Instead, all key stakeholders should be able to be represented on the Advisory Board.

TIANZ recommends that recommendation five be removed from the Strategy.

6. The Biosecurity Council undertake a review of the biosecurity system in 18 months time

TIANZ believes that the Advisory Board should undertake (or at least oversee) this work.

7. The establishment of a standing committee including relevant chief executives and regional council representatives

TIANZ strongly supports this recommendation.

8. Requiring lead agencies to take a facilitating and leadership role in pest management including a more intensive and operational exchange through the Biosecurity Managers' Group

TIANZ strongly supports this recommendation.

9. Encouraging public awareness so that public participation to reduce biosecurity threats becomes a major part of the biosecurity management and that the necessary actions are taken to make this happen

TIANZ strongly supports this recommendation. We believe that the messages should be presented in such a way that recognises and respects that New Zealand is a multi-cultural and multi-lingual society, so that all New Zealanders may be part of this "public participation".

10. Lead agencies in particular should identify their responsibilities under the Treaty of Waitangi and develop appropriate capabilities, mechanisms and decision-making processes that ensure they meet those responsibilities properly.

TIANZ understands the need for this recommendation.

11. Reviewing the factors to be considered and clarifying the inputs to and the level at which technical and other non-technical decisions are made

12. Criteria for escalation

TIANZ agrees with these recommendations and the logic behind them.

13. Constitution of a Chief Executive's group

TIANZ supports this recommendation.

14. Decision criteria

TIANZ supports this recommendation.

15. Establishing key performance indicators

TIANZ supports this recommendation.

16. MAF and DOC jointly develop an approach to assessing impacts on biodiversity using MCA or other techniques

TIANZ supports this recommendation.

17. Operational agencies agree on appropriate analytical tools for assessing economic, societal, and environmental impacts and that these be applied consistently in biosecurity decision-making

TIANZ supports this recommendation.

18. The establishment of a standing a science advisory panel to support the lead biosecurity agencies

19. Improving decision-making processes through better integration of science and by subsequent review by the Advisory Board

20. Development of a biosecurity research strategy that sets priorities which support this strategy

TIANZ supports these recommendations.

21. A review of the capability to prevent, identify and manage biosecurity risk and a programme to address identified gaps

While TIANZ basically supports this recommendation, there are issues affecting the tourism industry that we believe the Team should carefully consider as part of this review.

In particular, New Zealand is one of the few countries with biosecurity processing at our borders. While we recognise this is only one part of the biosecurity risk management process, the efficient management of our border controls is critical to ensure that visitors to New Zealand have a good experience on their arrival. We believe this is important to ensure repeat visits, which ultimately is important to New Zealand's economic development.

This requires:

- Well trained staff that are friendly, culturally sensitive, efficient and suitable for this role. Such staff also need to view their role as one requiring excellent customer service
- Border control staff must have access to the latest technology that facilitates a smooth and seamless arrival
- Intelligent processing and limits on the number of times passengers are 'handled'
- Tourists to be provided with good quality educational material well in advance of their arrival in New Zealand, so that they are aware of the biosecurity risks in New Zealand and are able to behave in a way that minimises these risks

TIANZ believes that biosecurity systems in New Zealand must also be able to meet these demands. Any review of "capability" must have regard to the following requirements.

22. A review of the basis of biosecurity funding to ensure there are adequate sustainable resources to deliver the core preventative biosecurity programme including early detection of new species

TIANZ agrees with this recommendation.

23. The following activity areas should be a priority for funding review including: passenger clearances; cargo and container clearances; vessel clearances; biosecurity coordination; surveillance for export certification purposes and one-off incursions.

TIANZ welcomes this funding review however TIANZ believes that debates about cost recovery can get in the way of effective risk management and best practice.

TIANZ believes in the following principles for funding:

- Border controls benefit the whole country and not just one section of the country

- Central government is best placed to determine (in consultation with key stakeholders) appropriate levels of biosecurity risk management
- In a cost recovery environment those paying would have a stake in seeking the minimisation of interventions, creating potential biosecurity risks.

Overall, TIANZ believes that our national community having identified biosecurity risks must be prepared to fund the initiatives required to manage such risks. The costs of such initiatives should not be imposed on any particular groups or sectors of the economy.

For these reasons, TIANZ considers that central government should fully fund passenger clearance, and that this should be the case for all international airports, and not just the main metropolitan airports.

TIANZ will also strongly oppose any steps to introduce new border control charges on visitors to New Zealand for the following reasons:

- Such charges would increase the costs of travelling to New Zealand and reduce New Zealand's competitiveness as a tourist destination
- Biosecurity services benefit New Zealand residents and all New Zealanders have a stake in the effectiveness of New Zealand's biosecurity policies. TIANZ therefore believes that New Zealanders, and not overseas visitors, should be relied upon to generate the funding for effective biosecurity policies. General taxation is the appropriate funding source for biosecurity initiatives, including border controls.

*Tourism Industry Association New Zealand (TIANZ)
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