



tourism
INDUSTRY
ASSOCIATION NEW ZEALAND

**Subantarctic Marine Protection
Planning Forum Consultation**

31 July 2009

Introduction

1. This paper is from the Tourism Industry Association New Zealand (TIA), located at level 4, Tourism and Travel House, 79 Boulcott Street, Wellington.
2. Attached as Appendix 1 are details about our organisation and who we represent.
3. The paper provides comment to the Subantarctic Marine Protection Planning Forum.
4. If you wish to contact us regarding this submission, in the first instance, please telephone Geoff Ensor, Advocacy Manager on 04 496 4889 or e-mail geoff.ensor@tianz.org.nz or Simon Wallace, Policy Manager on 04 494 1842 or e-mail simon.wallace@tianz.org.nz

Comments:

While TIA has not been represented on the forum, we have read the June 2009 Consultation document and wish to make the following observations.

5. New Zealand's visitor industry relies hugely on our 100% pure image, a key component of which involves fostering a responsible ecosystem management regime.
6. The tourism industry embraces the principle of Kaitiakitanga: guardianship and sustainable management of our natural, built and cultural resources for the collective benefit of current and future generations. Protection and enhancement of our environment is one of four key outcomes of the [New Zealand Tourism Strategy 2015](#) – it is within the context of these principles and outcomes that we express our views.
7. We note that in 1998 UNESCO listed the subantarctic islands and their territorial seas (12 nautical miles around the islands), as world heritage sites. The listing conveys the highest possible international conservation status for these islands, recognizing that they have outstanding conservation and scientific significance.

The nomination for World heritage status also listed natural features of 'outstanding universal value' that had direct links to the marine

environments surrounding the islands. These are listed a – k on page 11 of the consultation document.

8. We further note that a marine reserve was declared around the Auckland Islands in 2003. The reserve extends from the shore to the territorial sea boundary at 12 nautical miles, and protects the ecosystem from extractive uses such as fishing and mining.
9. In addition, bullet point 42 on page 17 states: *'The MPA further directs that the government's decision is that protection of outstanding, rare, distinctive or nationally or internationally important marine communities will be by means of marine reserves. These considerations have been given particular prominence in the Terms of Reference'*.

Appendix 2 comprehensively lists the outstanding, rare/distinctive and nationally important considerations for each island.

10. While we have referenced some specific parts (7, 8, and 9 above) from the Consultation Document, the tone and detailed content of the *whole document* entirely validate the Subantarctic Islands' World heritage listing and MPA status around the Auckland group.
11. The interdependence of terrestrial and marine species is of particular concern to TIA. We have a strong sense that permitting even limited commercial fishing may result in an ecosystem 'wobble' i.e. extraction of a particular marine species may have a profound and unforeseen effect on the ecosystem as a whole. TIA would advocate a cautious approach to managing such a unique and internationally significant environment.
12. From the evidence provided, TIA sees a unique opportunity to fully protect the marine environment and in doing so show environmental leadership. From a tourism perspective, it is critical that New Zealand shows leadership in this manner and in doing so overtly demonstrates a commitment to the environment and long-term sustainability.
13. The number of visitors seeking Ecotourism experiences is growing and as well as acting as advocates for conservation, these type of visitors may offer the most sustainable economic contribution to and from the subantarctic Islands. Tourism needs to be well managed in such a unique environment, but it is significant that countries like Chile and Brazil are investing heavily in tourism in preference to extractive industries that are not regarded as sustainable.

14. Visitors will be attracted to areas that offer complete protection of the terrestrial and marine environment, just as they will be attracted to a country that has leaders and communities prepared to make those types of decisions.
15. TIA believes the logic that drove implantation of a marine reserve around the Auckland Islands applies to the three islands under review. From the evidence provided it would be hard to conclude that Antipodes, Bounty and Campbell are any less worthy of full MPA protection out to 12 miles.
16. It appears that declaration of full marine reserve status around the three islands would have little effect on existing commercial fishing activity. As previously stated, TIA would be concerned about the impact on the terrestrial and marine ecosystems if even one species was targeted e.g. the Giant Spider Crab. As previously stated, we have a tremendous opportunity to get this right and anything less than a cautious approach could be seen as irresponsible.
17. From the evidence provided in the June 2009 Consultation Document , a compelling argument exists for adopting option 2 as the preferred option for Antipodes, Bounty and Campbell Islands.

Recommendation:

18. Antipodes Island – Option 2: complete no-take marine reserve.
19. Bounty Islands – Option 2: complete no-take marine reserve
20. Campbell Island – Option 2: complete no-take marine reserve

Background Information on the Tourism Industry Association New Zealand (TIA)

21. The Tourism Industry Association New Zealand (TIA) advocates for the interests of the tourism industry in New Zealand. The businesses we represent generate more than 85% of New Zealand's tourism-related revenue.
22. Tourism is a \$20.1 billion industry (\$8.8b from international and \$11.3b from domestic tourism) with international tourist expenditure accounting for 18.3% of New Zealand's total export earnings.¹ The industry, directly and indirectly, 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, representing 9.2% of New Zealand's GDP, it is:
- Highly employment intensive;
 - Regionally disparate; and
 - Very diverse - ranging from large stock exchange listed companies to small cottage industries.
23. These businesses cover a range of tourism-related activities – hospitality, transport, adventure and activities, attractions and retail and related tourism services. In many cases, regional tourism businesses have developed around regional assets divested by other industries and has revitalized those assets and the communities that depend on them.
24. The tourism industry in New Zealand consists of more than 8,000 small and medium sized businesses. Of these businesses, most employ less than five people.
25. New Zealand welcomes more than two million overseas visitors to its shores every year. The domestic tourism industry is also important in helping to sustain a vibrant tourism industry. TIA estimates that over 75 million visitor nights are spent by New Zealanders every year.

¹ "Key Tourism Statistics – December 2008, Ministry of Tourism website