

26 July 2023

Secretariat for the Tourism Industry Transformation Plan
Ministry of Business, Innovation and Employment
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Wellington 6140

By email: EnvironmentITP@mbie.govt.nz

Tēnā koe,

DUNEDIN CITY COUNCIL SUBMISSION: DRAFT TOURISM ENVIRONMENT ACTION PLAN 2023

1. The Dunedin City Council (DCC) appreciates the opportunity to submit on the Ministry of Business, Innovation and Employment (MBIE) consultation on the draft Tourism Environment Action Plan 2023.

Background considerations

2. Ōtepoti Dunedin's Destination Management Plan (the Destination Management Plan) was approved this year after a review of the previous Plan developed in 2017.
3. The Destination Management Plan takes account of a range of strategies, plans, policies, investment, and community and sector initiatives, including Te Ao Tūroa, Dunedin's Environment Strategy which identifies visitor management as a way to protect Dunedin's natural environment.
4. The DCC has also declared a climate emergency and set a target for Ōtepoti Dunedin to reach net zero carbon emissions by 2030. A Zero Carbon Plan for the city is in the final stages of development.
5. Managing down emissions from the transport sector is important for achieving Ōtepoti Dunedin's 2030 targets because transport is a high emitting sector. Dunedin's transport emissions are affected by the volume and distance of trips generated by international and domestic tourism, both inbound and outbound. Visitors travelling to Dunedin, and residents leaving Dunedin to travel elsewhere, both generate emissions. Key transport emissions sources relevant to the tourism sector include on-road land transport (a total of 56% of transport emissions) and aviation (a total of 4% of transport emissions). Cruise vessels are not currently included in Ōtepoti Dunedin's emissions footprint due to a lack of data, but they are a significant source of emissions.
6. Provisional modelling undertaken to support draft Zero Carbon Plan development suggests that, to achieve Ōtepoti Dunedin's 2030 targets, relative to the 2018/19 baseline year:
 - emissions from on-road transport will need to reduce 39%,
 - overall marine emissions will need to reduce 40%, with a possible need for greater emissions reduction from the cruise sector, and

- emissions from aviation will need to reduce 50%.

General Position Statement

7. The DCC supports the draft Tourism Environment Action Plan 2023 and six Tirohanga Hou. The DCC already supports initiatives aligned with the six Tirohanga Hou. They include:

- *Tourism journeys are decarbonised:* Promoting sustainable travel, in collaboration with Queenstown Lake District Council and Central Otago District council.
- *Tourism businesses are incentivised and enabled for sustainability and regeneration:* The DCC – in conjunction with Business South – have delivered sustainability workshops to help tourism businesses look at sustainability practices and introducing carbon measurement to those at the start of the journey.
- *Visitor management is optimised for te taiao:* The DCC is part of Southern Way Regional Marketing a collaboration of eight Regional Tourism Organisations in the lower south of New Zealand) informing and inspiring visitors to slow down, explore further, stay longer and ultimately return. It highlights mindful travel. All members of Southern Way have Destination Management Plans with strong sustainable measures.

The DCC is also part of the Otago Cycle Trails Marketing Group, a collaboration of four Regional Tourism Organisations encouraging cycle tourism and regional dispersal of visitors.

8. There is consistency between the Destination Management Plan and the Draft Environment Tourism Action Plan 2023. The Destination Management Plan includes a commitment to world-leading environmental practices (Priority 4, below) through environmental standards and guidelines and initiatives to support and improve the environment.

Priority 4 of the Ōtepoti Dunedin Destination Management Plan

PRIORITY 4: Pathway to developing world-leading environmental practices

Perhaps the most shared aspiration uncovered during the consultation process was the desire for Ōtepoti Dunedin to lead the way when it comes to the preservation and protection of our natural taoka – our whenua, our wildlife and our communities. Ōtepoti Dunedin is blessed with a large number of cultural and natural assets, and many taoka call this beautiful place home, a place we need to take responsibility for to protect them for future generations.

SUPPORTING ACTIONS	WHY THESE ARE NEEDED	POTENTIAL PARTNERS (not limited to)	DESIRED OUTCOMES
4.1 Determine environmental standards and guidelines appropriate for the Ōtepoti Dunedin visitor sector	Our shared aspirations aim to enhance greater Ōtepoti Dunedin's natural, cultural and built environments. There also needs to be alignment with existing policies e.g. DCC Te Ao Turoa - Environment Strategy (which includes carbon targets, waste etc), ORC Regional Policy Statement, Tourism Sustainability Commitment, Tiaki Promise, Dunedin Wildlife Code, Kai Tahu Ki Otago Natural Resources Management Plan.	DoC Mana Whenua Visitor Sector DCC ORC Tourism Industry Association (TIA) University of Otago	Environmental strategies to support the visitor sector are consistent and aligned Environmental standards and guidelines are defined, adopted, and monitored in DMP reviews Sector engagement and compliance with guidelines Positive community feedback
4.2 Develop initiatives with industry that support and improve the environment and connect our visitors with environmental initiatives	Biodiversity should be the key focus because Ōtepoti Dunedin has unique habitats and species, which are a key attraction for visitors. There are wins all round if the visitor economy helps to improve our biodiversity. Visitor sector to work with local community initiatives to align purpose brand with visitors including - Predator Free Dunedin, Yellow-eyed Penguin Trust, NZ Sealion Trust, Dunedin Wildlife Hospital, Otago Peninsula Trust, Orokonui Ecosanctuary.	DoC, DCC, ORC Mana whenua Visitor Sector Community	Hoiho numbers stabilise and increase Other key species numbers increase Protected habitats and native plantings increase at greater rate than baseline – especially in key coastal areas Pest species decrease at greater rate than baseline More visitors actively involved in conservation
4.3 Investigate the benefits and burdens of the cruise sector	Cruise is "mass tourism" for Ōtepoti Dunedin, and places peak demand burdens on operators, buses, and CBD businesses. It is vital to identify Ōtepoti Dunedin's capacity to fulfil cruise guests' expectations, and the community's desire and ability to welcome cruise guests, as well as cater to our FIT and domestic markets.	Visitor Sector Port Otago/Cruise Association Business South Community Dunedin Railways/University of Otago	Benefits and burdens identified and quantified as a basis for ongoing planning
4.4 Develop a sector-lead cruise action plan	Positive social license is vital for the health and wellbeing of the visitor sector, cruise sector, our communities and our visitors. This will involve taking the results from the benefits and burdens investigation and developing a sector wide plan and approach to the cruise market. This should include ensuring experiences sold to cruise passengers and supported by the district are quality experiences. Consideration should be given to exploring the consequences of capping cruise ship visits to the city.	Cruise Action Group DCC – including Zero Carbon Team Enterprise Dunedin, Transport, Waste Minimisation teams Waka Kotahi/Otago Regional Council Transport Providers University of Otago/Port Otago Cruise Association NZ/Visitor Sector Rep	Definition of acceptable numbers of cruise visitors to match Ōtepoti Dunedin's infrastructure Identification and application of ways of meeting increased demand Positive feedback from residents following plan implementation
4.5 Determine a sector-wide approach to climate adaptation and waste adaptation and promote individual operator plans	Climate change, waste and other issues should not be neglected, and the visitor economy should understand the impacts of their individual operations and have a plan in place to minimise carbon footprints. A Climate Change adaptation plan would also be of benefit.	DoC, DCC, ORC Mana whenua Visitor Sector Community	Green initiatives showing benefits - e.g. wind power, waste reduction, forestry and other green waste re-use - e.g. bio-fuels, compost Average visitor waste and carbon travel footprint decreases

Specific comments

9. The DCC supports the proposed assessment of the environmental impacts of the current mix of visitors. National guidance and insights on lower emissions markets would help progress this action in a way that aligns with emissions reduction goals.
10. The Draft Environment Tourism Action Plan 2023 identifies shorter transport distances and longer stays as ways to reduce emissions. The DCC notes there is already evidence that some tourism activities better align with these outcomes. For example, while recent years have been Covid-affected, the vast majority of Nga Haerenga Great Rides cycle trail users are domestic tourists, and that they also provide for local residents. There is an opportunity to support regions to continue to fill gaps in the network of cycleways; this would advance the outcomes sought while the wider assessment of target markets is progressed.
11. The DCC strongly supports the scaling of inter-regional passenger transport. The Draft Environment Tourism Action Plan 2023 identifies shortfalls in the quality and availability of inter-regional passenger transport relatively to comparable global tourism destinations as a barrier to emissions reduction. Scaling mass land-based transport systems, including inter-regional passenger rail and coaches and improving services and infrastructure for tourists will also provide low carbon transport options for local residents.
12. The DCC encourages government investment to improve the emissions intensity of aviation fuels, including potential application of a sustainable aviation fuel mandate. However, particular emphasis on use of electricity for domestic flights is supported, and the DCC would support explicit consideration of the actions required to give early effect to this in the proposed Tourism Decarbonisation Roadmap.
13. The DCC encourages government support for feasibility studies and investigations into the provision of shore power to marine vessels, specifically cruise ships. We note the substantial upfront costs associated with any such infrastructure is currently a barrier to establishment.
14. The DCC notes government will need to support tourism businesses to decarbonise and enable sustainable and regenerative models.
15. The DCC notes that the government needs to appropriately fund and support the draft Tourism Environment Action Plan 2023 and advocates for the creation of a Ministry of Tourism with appropriate funding.
16. The DCC supports any initiative to increase the visibility of where and how visitors can 'give back' to Aotearoa New Zealand. The DCC notes that this could involve contribution to local conservation initiatives and/or sequestration efforts, including achievement of local emissions reduction or biodiversity goals.
17. The DCC would be supportive of a national led tourism system that harnessed emerging technology within the tourism sector.
18. The DCC anticipates there will be additional local actions that align with the Tirohanga Hou that will flow from implementation of the Destination Management Plan and actions to support achievement of Ōtepoti Dunedin's net zero emissions target. The DCC looks forward to drawing on the outputs of the Tourism Environment Action Plan as these work programmes progress.

Conclusion

19. Thank you for the opportunity to submit on the draft Tourism Environment Action Plan 2023.

Kā mihi ki a koutou,

A handwritten signature in blue ink, appearing to read 'Jules Radich', with a stylized, flowing script.

Jules Radich
Mayor of Dunedin