

**Trans-Tasman Resources South Taranaki Bight Offshore
Iron Sand Application**

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1.0 Introduction

This document has developed upon my submission from October 11th 2016 having studied the relevant documentation pertaining to the Trans-Tasman Resources Iron Sand Application. I am aware of a range of impacts of serious concern that will be addressed by separate submissions however the concerns from the initial submission are specific to the Sustainable Management of Tourism Destinations (SMTD). After all, 2017 is declared by the United Nations as the International Year of Sustainable Tourism for Development. This recalls the potential of tourism to advance the universal 2030 Agenda for Sustainable Development with aims to support a change in policies, business practices and consumer behaviour towards a more sustainable tourism sector than can contribute effectively to the Sustainable Development Goals.

Personal background includes conducting research for the National Tourism Development Authority Fáilte Ireland, past representative for Sustainable Travel International (STI). Presented research papers throughout academic institutes in Europe and the European Parliament and published recent International publications in peer reviewed journals.

The main reservations expressed in the initial submission have been developed upon within this document:

- Sustainable Management of Tourism: Environmental, economic, social and cultural heritage value.
- Stakeholder consultation process.

The sustainable management of tourism requires consideration due to the contribution it makes to the environment, maximised benefits to society, protection of culture and heritage, and economic value. The application of TTR Ltd. had no specific report addressing the sustainable management of tourism. Therefore, this resulted in complexity to review other reports with major themes that contribute to a holistic perspective. The following were reviewed:

- Greenaway, R. and Associates for TTR Ltd. (2015) Trans-Tasman Resources Ltd Sea Bed Mining, South Taranaki, Recreation and Tourism Assessment of Effects.
- Dodd, A. and Clough, R. (2015) Trans-Tasman Resources South Taranaki Bight Offshore Iron Sand Project: Archaeological Assessment.
- TTR (2016) The Offshore Iron Sands Project: Economic Impact Analysis Summary.

- Austin, K. and Buchan, D. (2016) Social Impact Assessment (SIA) of Trans-Tasman Resource Ltd Iron Sand Mining Project.
- Potiki, T. (2016) Cultural Values Assessment and Analysis.

As there was one report that addressed tourism, this is first reviewed in detail.

2.0 Recreation and Tourism Assessment of Effects – Greenaway Report 2015

The report for TTR Ltd. which focused on Recreation and Tourism Effects by Greenaway (2015) is fundamentally flawed. While it focuses upon effects, there has been no methodology outlined on how the effects upon Recreation and Tourism would be or could be assessed. Furthermore, there are no studies to date in which the effects seabed mining has upon tourism or a tourism destination.

The observations from the review of the Greenaway report will be addressed according to the title layout as presented in that report. These titles will be underlined for the purpose of transparency and clarity.

1 Introduction

Recreational Fishing: Within the introduction of the report (pg. 5) prepared by Greenaway and Associates (2015) it states:

“Very little recreational fishing occurs more than 20km offshore along the entire west coast of the North Island.”

This statement is misleading and not specific to South Taranaki. It does not correlate to the interviewee statements in the category of ‘Fishing’ which indicates otherwise.

“...the interviewee is aware of some fishing for hapuka occurring further out in 30 to 40m of water.”

“Some recreational fishing for groper, rig and shark occurs outside the 12nm limit.”

“Club members fish pretty much everywhere, including around the 12 nm limit. Cod are found on hard surfaces and don’t move around much, and snapper on the edge of the hard areas.... Bigger cod are further out, so heading further offshore is worthwhile. Hapuka are not common and are found a long way out...”

“Kingfish have been prolific around the rigs offshore. Locals team up once a year or so in extremely settled weather and take two or three boats directly offshore from Opunake to chase these larger fish, beyond the 12 nm limit.”

“Graham Bank and the 40 m drop-off along the coast is a preferred fishing setting, although there can be good fishing at any site where fish congregate and so there are plenty of options – but also some specific favoured sites. The odd hapuka turns up at the 40m contour.”

These local interviewees statements provide clarity that recreational fishing does occur beyond the 12nm limit. It is also important to note that five statements made reference to this out of ten interviewees of whom were not all belonging to fishing activities category. The SIA assessment by Austin and Buchan (2016) indicated that the extraction area may displace a small amount of recreational fishing.

3 Recreation and Tourism Effects

3.1 Issues identified through consultation

For the consultation, the report states:

“A community meeting with recreation groups was held in Hawera on the 13th of August 2013...”

This consultation is insuffice. The above makes reference to a meeting with recreation groups. The inclusion of stakeholders is a fundamental component and the meeting did not include a cross section of tourism stakeholders. This is a fundamental flaw to the report particularly as the Greenaway report is specific to ‘Recreation and Tourism Assessment of Effects.’ The local community is pivotal for this process also. A community’s practical involvement in tourism is central to the sustainability of tourism (Murphy, 1985, 1988; Olsen, 1997; Mountain Agenda, 1999; Scheyvens, 1999; Ross and Wall, 1999; Campbell, 1999, 2002; Page and Dowling, 2002; Boyd and Singh, 2003; UNWTO, 2004; Jones, 2005; Choi and Sirakaya, 2006; Viljoen, 2007; Simpson, 2008; Lee, 2012).

Despite the initial meeting with recreation groups in August 2013, recreation and tourism stakeholders should have been consulted again for the current proposed application. After all, South Taranaki and the Taranaki region is experiencing growth in tourism annually and there have been changes since 2013.

3.2.5 Effects on New Zealands ‘clean green’ reputation

The summary of this section of the report indicates (p.14):

“There is **very little potential for adverse effects** on New Zealand’s tourism brand as

the mining activity has limited adverse environmental effects and occurs well away from internationally and nationally important tourism settings.”

There are no benchmark studies to date or studies that have assessed the impact of seabed mining upon tourism branding. Therefore this conclusion is illogical. The European Commissions (2015) stakeholder survey on seabed mining concluded the need for more research and increased transparency. These findings may be echoed for this case.

The 100% Pure New Zealand branding was established over the past 16 years. It is important that this iconic branding is protected and maintained. Considering this project is being opposed by the people for the second time, individuals concerns are valid that this may hamper the New Zealand's reputation as “100% Pure New Zealand.” Tourism New Zealand promote as “A Land and People Rich with Stories”. Yet the people are not even involved in an adequate stakeholder consultation process.

4.3 Other secondary data

In this section of the report, data is presented from the following:

- Taranaki Regional Council and Regional Water Board (1983).
- Taranaki Regional Council (TRC) (2004): Information indicating the coastal areas overall have a moderate to high amenity and recreation value.
- Department of Conservation (DOC) (2006): Data which is eleven years old, depicting inaccurate information.
- Taranaki Regional Council (2008): The TRC coastal recreation study was published in 2008. Data which is not current.
- Hartill et.al (2011): While they are findings presented from a report published in 2011, it is important to note that the studies were carried out between 2005-2007. The data is more than ten years old and out dated. A longitudinal study would be required to obtain current up to date data on Recreational Harvest Estimates.

It is critical that all data pertaining to a large project is current and up to date. Outdated reports present misleading information as it lacks accuracy.

4.4 Biosecurity NZ – Mapping the values of New Zealand's Coastal Waters

This section makes reference to a report by Allen et. al (2009) which indicated:

“...at the national level, there is only a coarse understanding of the distribution of marine recreation.”

This recognises the limited knowledge of marine recreation, a remit which requires fundamental consideration.

4.5 Other data sources

This section of Greenaways report makes reference to Surfcasting and Surfing. There is no in depth overview or detail of assessment of effects that the sea bed mining would have upon surf tourism which is prominent in the South Taranaki area as a result of Surf Highway 45. Considering the extent of surf tourism to South Taranaki, Greenaways assessment does not consider attributes which are most influential in choosing a surf tourism destination and how these may be impacted upon through the proposed development.

2.1 Conclusion based on the Greenaway Report

The reports claims that “there is only potential for only very minor effects on recreation and tourism in the South Taranaki Bight due to exclusive occupation of the marine environment as proposed due to the very small area occupied by the activity”. The report is specific to assessment of effects on recreation and tourism however there is no outline on how effects are measured. Therefore, it is impossible to conclude on potential effects. This report did not include a holistic view of the multi-dimensional layers of tourism.

This report is at large focused upon Recreation rather than Tourism. The report forms conclusion on the effects on recreation yet the SIA by Austin and Buchan (2016) indicated that it cannot be certain about the significance of the effects on recreation.

There has been no outline for assessing direct effects on tourism.

There are no baseline studies conducted in which the effects that sea bed mining will have upon tourism. There is no data on how the sea bed mining effects upon tourism may be assessed or compared against in the future.

The Greenaway report fails to include current up to date data.

This report did not assess the direct and indirect economic effects of the sea bed mining project upon the local economy. This report fails to acknowledge that cultural heritage, local folklore, spiritual and archaeological sites links to tourism.

The report did not include or make reference to current or existing studies of tourism stakeholder perceptions of seabed mining. It would be considered vital to conduct an assessment of the impacted areas tourism stakeholders to identify their perceptions of seabed mining considering the significance of tourism in the area.

Despite reference to a small number of interviewees, there was not an adequate representation of the stakeholders in the area.

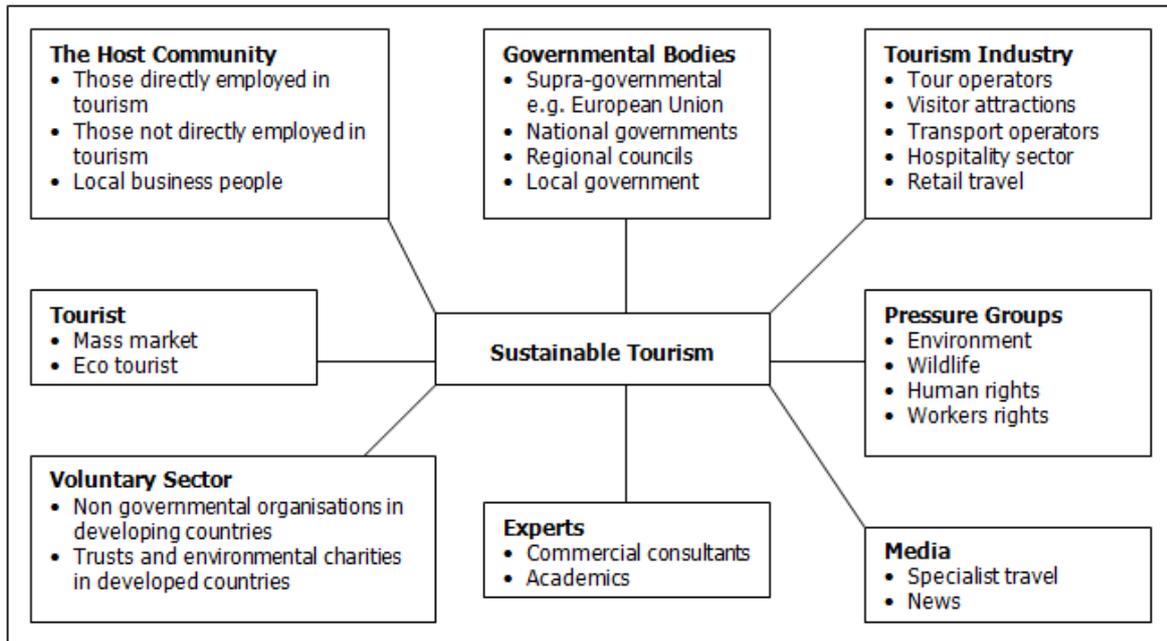
The Greenaway report has allocated no consideration for implications or mishaps with the seabed mining project and potential effects which would result upon recreation and tourism. The report does not address effects upon the sustainable management of tourism.

The remainder of the report addresses the reservations of SMTD and stakeholder consultation in light of the documents pertaining to the application of TTR Ltd.

3.0 Stakeholder Involvement

The development of tourism in a sustainable manner is unattainable without stakeholder participation (Ap, 1992; Gunn, 1994; Andereck and Vogt, 2000; Gursoy, Jurowski and Uysal, 2002; Andriotis, 2005; Byrd, Cardenas and Dregalla, 2009). Stakeholder's meaningful participation is critical and a fundamental ingredient in sustainable management efforts (Sautter and Leisen, 1999). A community's practical involvement in tourism is central to the sustainability of tourism (Murphy, 1985, 1988; Olsen, 1997; Mountain Agenda, 1999; Scheyvens, 1999; Ross and Wall, 1999; Campbell, 1999, 2002; Page and Dowling, 2002; Boyd and Singh, 2003; UNWTO, 2004; Jones, 2005; Choi and Sirakaya, 2006; Viljoen, 2007; Simpson, 2008; Lee, 2012). It is imperative to recognise stakeholders when managing tourism more sustainably and to take account of their different perspectives on the related issues (Bramwell, Henry, Jackson, and Van der Straaten, 1996; Hardy and Beeton, 2001; Dodds, 2007; Waligo, Clarke and Hawkins, 2013).

Figure 1 The key stakeholders in sustainable tourism



Source: Adapted from Swarbrooke (2000: 17) (Conaghan and Hanrahan, 2013).

Local stakeholder involvement in tourism is considered vital to have an influence to deliver the maximum benefits for the destination (Murphy, 1988; Jones, 2005; Hanrahan, 2008; Myers, Budruk and Andereck, 2011). Furthermore, involvement from tourism businesses, the holidaymakers and the host community is essential for the success of sustainable tourism. Their participation in all steps of management will contribute to public consciousness and facilitate the sustainable management of tourism in South Taranaki. This locality and the local business community gain from direct and indirect benefits of tourism. The survival of many local businesses may be jeopardised without tourism as it assists the development of SME's and therefore enhances the entire local community. TTR Ltd. and consultants who prepared reports for TTR Ltd. failed to involve a representative sample of local stakeholders for consultation regarding the proposed development, irrespective of the stakeholders involved in tourism.

3.1 Stakeholder Survey on Seabed Mining – European Commission (2015)

Since TTR Ltd initial submission, the European Commission conducted a public consultation with a stakeholder survey on seabed mining and the concern of tourism was indicated by Birdlife Europe. The concern was that plumes from mining might not only harm marine life but also damage fishing and tourism. This in depth report also indicated:

“The European Marine Board thought that it was not only knowledge of deposits that is lacking, but also "our knowledge of the natural histories, life cycles, ecosystem interactions, and ecological functions of marine species and ecosystems. Still less is known about their resilience to human threats and natural pressures." The Surfrider Foundation of Europe and other civil society groups echoed these concerns. One researcher from France pointed out that we need to "explore the potential services these ecosystems and their associated biodiversity provide to humanity" (European Commission, 2015: 22).”

This study conducted by the European Commission covered the current and latest state of knowledge of deep-sea mining. There were 206 replies and an additional 515 respondents with a representative selection of private bodies, public authorities, researchers and civil society who provided a wide variety of views on the different aspects of both shallow and deep water mining. It is critical to note that a number of recommendations from all groups were similar:

“more research, increased transparency, tighter standards and better maps.”

This recommendation is reiterative of stakeholders concerns as there is currently not an adequate amount of research and scientific knowledge. Thus, it is more important to acknowledge the significance of tourism for South Taranaki, Taranaki and New Zealand and the benefits to accrue.

4.0 Towards the sustainable management of tourism destinations

The shift towards the sustainable management of tourism destinations is being consolidated at an international level. This is recognised through the European Commissions (EC) (2013), European Tourism Indicator System (ETIS) for sustainable management at destination level. It is also reflected internationally with the Global Sustainable Tourism Councils (2008, 2012) move towards sustainable tourism criteria for destinations and the UN’s declaration of 2017 as the International Year of Sustainable Tourism for Development.

Sustainable tourism has been discussed for decades. Therefore, it was unsuspected that it would not be addressed or even referred to by the reports prepared for TTR Ltd.

4.1 Environmental Impacts

Tourism destinations rely on a pristine environment including clean seas and unpolluted water (WTTC et al., 1995; Welford and Ytterhus, 2004). If there was an absence of an

attractive environment, there would be little tourism (Mathieson and Wall, 1982). Resources need to be conserved considering the environment is the main resource for many tourism destinations (Cooper et al., 2008; Dolnicar and Leisch, 2008). Tourists are interested in having a holiday at an unspoilt natural area (Dolnicar and Leisch, 2008). Therefore, the destinations have an incentive to protect and enhance their environmental assets (Weaver and Lawton, 2006). This information is pertinent to New Zealand as it is known for its 'clean green image' and as it considers an application which involves the deep seabed, the least understood ecosystem on Earth (Institute for Advanced Sustainability Studies, 2017).

For the management of a tourism destination, the following environmental impact indicators ought to be taken into consideration:

- Environmental Risks
- Biological diversity
- Physical integrity
- Environmental purity
- Biodiversity protection
- Resource efficiency
- Water management and quality
- Wildlife protection
- Reduce transport impact
- Marine habitat management

The report by Greenaway (2015) on Recreation and Tourism Assessment of Effects did not address each of these indicators which are relevant for the assessment of effects of a tourism destinations environment. It is acknowledged that there are other reports that address other aspects of environmental impacts. The Institute for Advanced Sustainability Studies (2017) indicated that environmental reviews have shown that deep seabed mining could result in irreversible harms on a large scale. The Greenaway report did not indicate this or address the potential aspect of mishaps or environmental risks as a result of the seabed mining.

Tourism contributes significantly to the area and it is important to note that tourism has the potential to make a positive contribution to the environments resources (Saalinen, 2006; Conaghan and Hanrahan, 2013). After all, environmental protection is easier and less expensive than environmental correction (Cooper, Fletcher, Fyall, Gilbert and Wanhill, 2008). If seabed mining encountered mishaps, environmental correction would be needed, leading to expense and the impacts may be irreversible thus damage to the tourism destination.

The SIA by Austin and Buchan (2016) did address visual amenity within the report however does not address the visual amenity impacts from an aerial view which must be taken into consideration.

4.1.1 Surf Tourism

Surf tourism has become a significant component of the worldwide adventure tourism sector, generating sufficient economic, social and environmental significance (Buckley, 2002a; 2002b; Barbiera and Sotomayor, 2013). Surf Highway 45 is an all year round travel route recognised worldwide. Surf tourism is a fast growing niche sector as in 2002, it was estimated that the economic scale of the surfing industry, including travel, surf-branded clothing and the manufacture of surfboards, to be in the order of US\$10 billion per annum and that there were some 10 million surfers worldwide (Buckley, 2002). As of 2011, the numbers of surfers were reported to be 35 million.

Greenaways report included a statement from one of their interviewees which made reference to an iconic wave of the southern hemisphere located in the area:

“The surf breaks in the Patea to Whanganui stretch of coast are important alternatives to those around the Cape area in north-westerly conditions. In the north, the NW wind is onshore and creates a messy wave, while it more offshore around Kai Iwi, Waipipi and Waiinu, making for clean-faced waves. The waves will be smaller in these areas compared with further north, but better to surf in these conditions. The break at Fences – around Snapper Rock south of Waiinu – is one of the longest (if not the longest) right handed break in the southern hemisphere and the sets can stretch for 2.5 km in the right conditions due to the angle of the local coast and the form of the beach.”

There is existing research on ‘Surf travel behaviour and destination preferences’ which was conducted by Barbiera and Sotomayor (2013). The research identified (Table 1) that attributes that were most influential in choosing a surf tourism destination, were preferences for the variety of waves and the quality of the natural environment and the availability of special types of waves in the destination. The South Taranaki area is a location which offers all of these attributes. The quality of the natural environment is the second noted attribute in preference for a destination.

Table 1: Perceived importance of surf destination attributes

Destination attributes ^a	n	Very unimportant	Unimportant	Neutral	Important	Very important
Surfing appeal ($\alpha = 0.742$)						
Abundance of good waves	116	.9%	.9%	1.7%	25.9%	70.6%
Variety of wave types	117	.0%	6.0%	15.4%	38.5%	40.1%
Quality of its natural environment	117	3.4%	4.3%	9.4%	44.4%	38.5%
Secluded and unspoiled place	117	4.3%	4.3%	16.2%	37.6%	37.6%
Special types of wave	116	2.6%	6.0%	13.8%	44.0%	33.6%
Area never crowded	117	2.6%	7.7%	12.8%	43.6%	33.3%
Popular surf destination	117	11.1%	22.2%	29.1%	24.8%	12.8%
Good place to meet other surfers	116	24.1%	27.6%	26.7%	11.2%	10.4%
Access and infrastructure ($\alpha = 0.865$)						
F&B services located nearby	115	7.0%	20.9%	19.1%	40.0%	13.0%
Easy access	117	6.8%	19.7%	32.5%	31.6%	9.4%
Closeness to a community or town	116	11.3%	26.7%	20.7%	28.4%	12.9%
Restroom facilities located on-site	115	14.8%	21.7%	25.2%	23.5%	14.8%
Undeveloped site	117	16.2%	20.5%	44.4%	12.8%	6.1%

^a Overall reliability ($\alpha = 0.843$).
^b Measured on a five-point scale ranging from 1 (Very unimportant) to 5 (Very important).

Source: Barbiera and Sotomayor (2013).

Greenaways report failed to acknowledge the effects that a seabed mining project in the region may have upon surf tourists and their perceptions of South Taranaki as a surf destination. While Greenaway makes reference to statements such as ‘unlikely to be any noticeable effects’, ‘changes to wave patterns onshore are likely to be very slight’, these statements provide no concrete stable data.

The SIA by Austin and Buchan (2016) also addressed surfing and acknowledged the high quality surf breaks along South Taranaki/Whanganui coastline. The area is also home to one of New Zealand's first artificial surf reefs. It was noted that changes in wave conditions in the vicinity of surf breaks would occur.

Tourism New Zealand promotes an array of driving itineraries for both North and South Island. The Surf Highway 45 route almost connects to The Forgotten World Highway. Up to date research acknowledges that surf tourism is emerging as a vital source of economic income and employment opportunities for remote communities (Towner, 2016). As the Surf Highway 45 is an all year round travel route, it may be timely for Tourism New Zealand to propose building upon this.

The west of Ireland has a rugged and natural landscape alike to the west of New Zealand. In 2014, Ireland launched the Wild Atlantic Way, the world's longest defined coastal touring route at a distance of 2,500km. The route offers a traveller much to see and do and is

beneficial in linking information on festivals and events, trails and looped walks, beaches, attractions and activities. Such routes distribute jobs throughout rural communities which may not have previously gained from tourism, thus dispersing the economic value of tourism to a country. The span of driving routes invigorates local communities along the way. This leads to enhanced community involvement and concern for environmental protection to boost visitor appeal. Such driving routes are beneficial to encourage longer visitor stays and incentivise tourists to return to continue along the route they wish to discover. New Zealand may be able to propose their own potential coastal route, the 'Wild Tasman Way' or 'Wild Surf Way' along the West coast of the North Island. Again, indicating the need to safeguard against large proposed developments such as TTR Ltd.

The Adventure Travel Trade Association (2017) has up to date research which confirms that with respect to destinations, adventure travelers favoured destination was New Zealand and they plan to visit in the future. The impacts of the seabed mining project could lead to devastating irreversible consequences upon the niche surf tourism within the adventure tourism market which is very suited and needed for South Taranaki with the potential to be expanded along the west coast.

4.1.2 Coastal Walkways

Walking is recognised as an important leisure and recreation pursuit for Taranaki residents. In 2013, the South Taranaki District council had initiated the South Taranaki Coastal Walkways which is valued for the views offered, shoreline features and historical and cultural resources. The SIA informed that many of the walkways and coastal viewing points in South Taranaki are from high cliffs. Austin and Buchan (2016) did indicate that 'the pleasantness, and hence amenity, of the walkways may be reduced by views of the large vessels on the horizon, and the sediment plume generated by the operations. The SIA does outline that the sediment plume will be visible on the surface of the sea which will potentially affect the visual amenity of the coastal environment when viewed from the water and coastline. Visual amenity impacts and the view of sediment plume would be a devastating impact upon the recent investment towards walkways in the area.

4.2 Social and Cultural Heritage

Tourism has the potential to raise industry standards in social stability while respecting the local culture and provide real social benefits for the long term. New Zealand enjoys a rich

cultural heritage that is central to who they are. Cultural heritage is the second influence for EU citizens when deciding on a holiday destination with environment being the primary influence (EC, 2011). Cultural heritage tourism is to reflect the national representation of a destination. The appropriate management of culture heritage is crucial not only for identity but also the self-respect and dignity of a tourism destination (Endresen, 1999). Once communities lose the character that makes them distinctive and attractive to non-residents, they have lost their ability to vie for tourist-based income in an increasingly global and competitive marketplace (McCool, 1995). It is important that communities maintain their character and culture. This is what differentiates them and it is often recognised as providing a competitive advantage. Maintaining their character will provide benefits through profits generated from tourism, developments and marketing. Thus important for social benefits to both tourists and residents.

Sustainable tourism should help conserve cultural heritage and traditional values (UNWTO, 2011). The revenue it generates may be used to maintain the cultural heritage properties (STCRC, 2010). It is necessary to also maximise the benefits to cultural heritage as tourism has a role in preserving the dignity of people and the viability of their cultural tradition (Walle, 1993). A focus within the UNWTO code of ethics for tourism is that it is a user of the cultural heritage of mankind and a contributor to its enhancement (NWHO, 1999). It is important that the latter is reflected upon with regards to the seabed mining proposal which will be in high amenity value areas. The South Taranaki/Whanganui coastline has rich and abundant historic and cultural features.

The cultural heritage aspect is a key concern with regards to the seabed mining project. The Cultural Values Assessment completed by Potiki (2016) acknowledged that TTR was having difficulty engaging a cultural assessment with Ngati Ruanui. The report lacks transparency to communicate the reasons why there was difficulty engaging. The number of submissions in opposition to this project is undoubtedly linked to why there is a lack of engagement with Ngati Ruanui.

Tourism New Zealand promotes as “A Land and People Rich with Stories”. Surely this reflects the need to substantiate and respect the spiritual and cultural views of the people. The application fails to provide active protection of Maori interests and taonga (particularly over

fisheries), but also negates kaitiakitanga (or stewardship) by tangata whenua over the environment.

The following social and cultural heritage indicators outlined by Conaghan and Hanrahan (2013) incorporate the GSTC and the EC ETIS. For the purpose of the seabed mining case, not all of these indicators have been adequately considered.

- Local community opinion
- Intellectual property
- Social cultural heritage impact
- Commemorative integrity
- Cultural richness
- Social equity
- Community wellbeing
- Employment quality
- Protecting and enhancing cultural heritage, local identity, assets and sites
- Attraction protection
- Visitor management
- Gender equality
- Support for community
- Site interpretation
- Visitor behaviour
- Visitor contribution/ traveller philanthropy
- Authentic destination representation
- Social/cultural heritage improvement initiatives

Greenaways report ‘Recreation and Tourism Assessment of Effects’ had not addressed the effects upon cultural heritage tourism or acknowledged the significance of cultural heritage as a component of tourism.

4.2.1 Concerns: Social Impact Assessment by Austin and Buchan (2016)

The SIA by Austin and Buchan (2016) was a re-issue of the report from 2013. The information is not up to date and fails to include a revised input from stakeholders. The report indicates that the approximate of 258 new jobs are unlikely to reduce employment levels significantly in the ‘local’ and ‘wider’ areas.

The SIA does not address the visual amenity impacts from an aerial view. The SIA indicated that it cannot be certain about the significance of the effects on recreation. The SIA also does not provide clarity on the approach to the study and clarify how many stakeholder interviews were conducted. As part of the SIA, it also does not address cultural effects as it states “No assessments on cultural effects were available at the time of writing this report” (Austin and Buchan, 2016). As this was a re-issue of the initial report from 2013, the cultural effects should have been addressed for the current proposal.

The SIA makes reference to the effect of the proposal on amenity values and this has an impact upon elements of social wellbeing. The SIA also acknowledges that:

“A major construction in a relatively natural environment can affect amenity in many ways. For example, the introduction of an unnatural and unexpected structure can reduce the pleasure of recreation activities within view of the structure, or alter the character of the area that is valued by the community. An intrusive structure in a scenic environment can also reduce the value of people’s homes and therefore their equity and hence their future opportunities (Austin and Buchan, 2016: 7).”

There was never any further addressing of the above points and how there may be a decrease in land and home value for those located within the vicinity of the project.

4.2.2 Employment Contribution to New Zealand

Tourism is a major contributor to employment as one in ten New Zealanders are employed in tourism, hospitality or travel. For the purpose of transparency, tourism’s contribution to New Zealand’s employment has been presented TTR Ltd. approximate contribution of employment (Table 2).

Table 2: Contribution to New Zealand’s Employment

TTR: Iron sands project	Tourism
258	188,136 (not including those indirectly employed)

The SIA outlines that 258 personnel will be required for TTR Ltd. proposed operations (Austin and Buchan, 2016). The New Zealand tourism employment figures 188,136 are the most recent key tourism statistics provided by Ministry of Business, Innovation and Employment (MBIE) (2017). It is important to note that these figures do not include those indirectly employed. Austin and Buchan (2016) referred to an FPSO survey which indicated a predominantly male workforce (96%). The employment contribution to South Taranaki will be strengthened through the continued growth of tourism. The MBIE (2016) have a Tourism 2025 framework with a vision of a 6% year on year increase in tourist numbers and revenue thus delivering the additional revenue and jobs which this country needs. Compared to seabed mining jobs, tourism employment is not male dominant, and the jobs are vast and varied.

4.2.3 Maritime Archaeology

Marine archaeology and maritime heritage is fundamental to informing knowledge of New Zealand's History. This is a country which relied heavily on the ocean for transport, food and trade. Both Polynesian and European ancestors relied on this. New Zealand is known for a rich maritime archaeology with more than 2,000 shipwrecks. Of more than 2000 shipwrecks, only about 150 have been accurately located according to Hutching (2006). Some shipwrecks have become locations for recreational diving.

The Taranaki region is an area well documented with shipwrecks. All shipwrecks are protected by the Maritime Transport Act 1994. Vessels that sank over 100 years ago are protected by the Historic Places Act (1993).

There was one particular major concern identified from the archaeological assessment. The assessment by Clough and Dodd (2015) indicated there are at least 126 documented shipwrecks in the Taranaki region, of which 64 pre-date 1900. 'The remains of the *majority* of these are in unconfirmed locations'. Dodd and Clough (2015) indicated that the potential for encountering shipwrecks in the South Taranaki Bight may be low but cannot be discounted entirely. The latter statement is unscientific and illogical. To suggest that the potential for encountering shipwrecks in the South Taranaki Bight may be low taking into account that the majority of remains of 126 documented shipwrecks in the Taranaki region are in unconfirmed locations. Despite that >50% of these are protected by the Historic Places Act (1993). Weak assertions are highly concerning with such a cultural and heritage sensitive issue.

It is fundamental to safeguard these assets of the Taranaki region and to acknowledge the spiritual and cultural significance of human interaction with the sea, human remains, submerged landscapes and shipwrecks. They provide vast insight to the knowledge of New Zealand history and some shipwrecks have become locations for recreational diving.

In the archaeological assessment by Clough and Dodd (2015), a recommendation was made:

"If a shipwreck is encountered during extraction operations, the appended 'Discovery Protocol for Shipwreck Finds' should be implemented, and on site contractors should familiarise themselves with this document."

There was no addressing of how this protocol would be regulated by TTR Ltd.

4.3 Economic Value Impact of Tourism

The tourism product of the South Taranaki area is part of the wider Taranaki and New Zealand product enjoyed by tourists. Tourism has the potential to provide significant social and economic benefits to the local community. It is also important for community development due to the economic benefits that the sector can generate while protecting the environment (Caldicott and Fuller, 2005). The area is at an advantage to tap into surf tourism. The popularity of surfing among participants and spectators has steadily increased fostering a multi-million dollar industry that stimulates local economies (Buckley, 2002a; Frank, Zhou, Bezerra and Crowley, 2009; Ponting, 2008; Tantamjarik, 2004; Barbiera and Sotomayor, 2013).

For the management of a tourism destination, the following economic impact indicators are pivotal to be considered:

- Stakeholder Participation
- Tourism flow at destination
- Tourism enterprise performance
- Quantity and quality of employment
- Local prosperity
- Economic Viability
- Local Access
- Preventing Exploitation
- Property Acquisitions
- Innovation in Product development
- Supporting local entrepreneurs and fair trade
- Local career opportunities
- Tourism Awareness
- Corporate Social Responsibility
- Economic Monitoring
- Tourism supply chain
- Cost/value

TTR Ltd. make reference to making a meaningful contribution to the local economy and to provide wider benefits to the community. However the sustainable management of tourism may contribute to community development due to the economic benefits the tourism sector can generate (Caldicott and Fuller, 2005). Surf tourism as Towner (2016) acknowledged is emerging as a vital source of economic income and employment opportunities for remote communities. Surf tourism is prominent for South Taranaki. It is important to compare the economic value of tourism to New Zealand and Taranaki in contrast to the projected contributions from the TTR Ltd. proposal.

4.3.1 Tourism Economic Value to New Zealand

Tourism is a multi-billion dollar contribution to New Zealand's economy. Table 3 outlines the economic contributions of tourism to New Zealand (2016) compared to the estimated economic projections from TTR Ltd. Economic Impact Analysis Summary.

Table 3: Contribution to New Zealand's GDP

TTR: Iron sands project	Tourism
Expected \$159 million	\$22.7 billion (\$12.9 billion direct \$9.8billion indirectly)

In 2016, tourism replaced the dairy industry as New Zealand's top export earner (Air New Zealand Group, 2016). Table 1 provides clarity on the significance of tourism to New Zealand in contrast to the projections of the TTR project. Clear indication of the need to safeguard tourism by protecting environmental quality for New Zealand's second largest earner of foreign exchange. Particularly as the Tourism 2025 framework has a shared vision to grow the contribution of tourism to NZ with a \$41 billion goal by 2025 as outlined in the New Zealand Tourism Forecasts (2016 - 2022) (MBIE, 2016). The envisaged 6% year on year growth will increase tourist numbers and revenue allowing the delivery of additional revenue and jobs which this country needs.

4.3.2 Tourism Economic Value to Taranaki/Whanganui

Tourism's contribution to New Zealand's economy filters through to Taranaki and Whanganui. Tourism spend within Taranaki/ Whanganui is provided for transparency to compare the projected spend of the TTR Ltd project in the area (Table 4).

Table 4: TTR - Tourism: Spend within Taranaki/Whanganui

	Amount
TTR Ltd.: Project operational Expenditure Estimate Annually in Taranaki/Whanganui	\$73 million
Tourism: Expenditure from international/ domestic consumers for Taranaki and Whanganui RTO (Year end spend Dec. 2016)	\$458 million

TTR Ltd indicated that the operational expenditure for the project is estimated to be about \$73 million annually in the Taranaki/Whanganui region. The most recent figures from the MBIE (2017) outlined the expenditure on tourism from both international and domestic consumers. The year end spend December 2016 for Taranaki RTO was \$335million and \$123 million for Whanganui RTO which has had 11.9% growth from the previous year. Indicating an increased spend by tourism consumers for Whanganui. Taranaki has experienced 15.7% growth in tourism spend from December 2015.

TTR Ltd operational expenditure is estimated at \$73 million annually in Taranaki/Whanganui. Whereas actual tourism expenditure amounted to \$458 million. Tourism is a growing industry for the region (MBIE, 2015). Within the Regional Activity Report (2015) by MBIE there were Business Growth Agenda Actions. There was a particular action made relevant to both Taranaki and Manawatu – Whanganui which was:

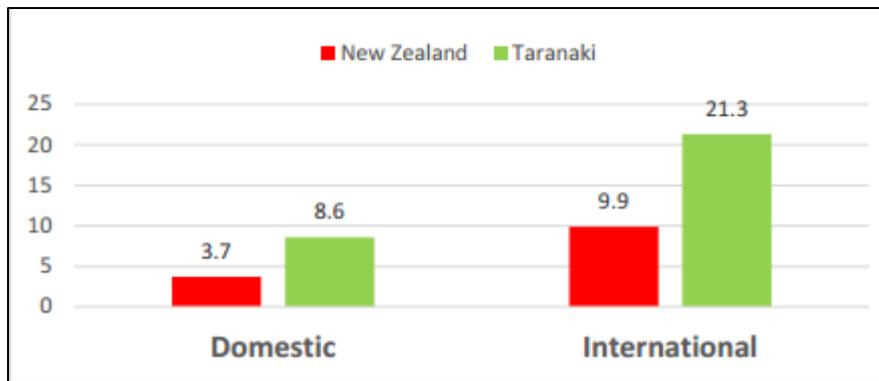
“Tourism Growth Partnership Fund to grow Tourism Infrastructure” (MBIE, 2015).

This action was a timely call for the Taranaki and Manawatu- Whanganui area by the MBIE. It is evident that the economic value of tourism to New Zealand and South Taranaki alongside the envisaged growth outweighs the need to approve a seabed mining project which will certainly not be an enhancement to the tourism sector.

4.3.3 Taranaki / South Taranaki visitor statistics

It is most beneficial for a tourism destination to maintain an up to date and ongoing record of visitor statistics. The Taranaki Visitor Statistics are from September 2016.

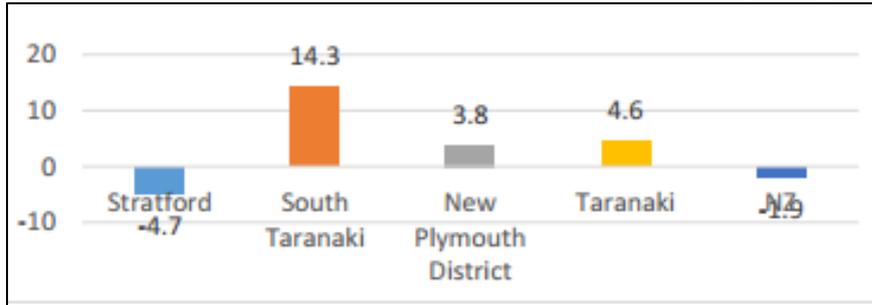
Table 5: Taranaki: % Change in guest nights from previous year (Y.E. Sept. 2016)



Source: Venture Taranaki (2016).

Table 5 identifies that Taranaki had increases in both domestic visitor nights (8.6%), and international guest nights, which experienced a significant gain (21.3%). The findings are well ahead of the national average: 3.7% and 9.9% (Venture Taranaki, 2016).

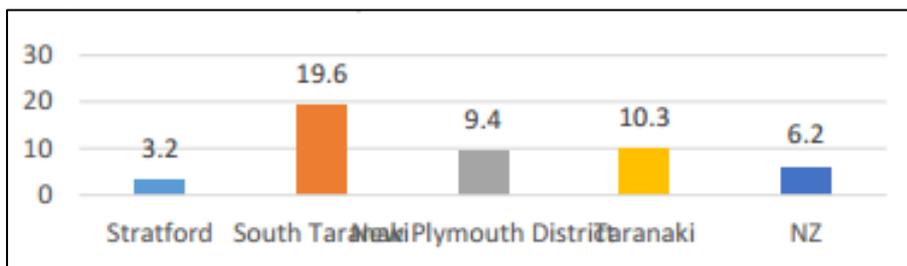
Table 6: Taranaki: Commercial Accommodation – Average length of stay (Y.E. Sept. 2016)



Source: Venture Taranaki (2016).

These statistics illustrate tourism advancement within South Taranaki. Table 6 clearly outlines that the average length of stay increased significantly in South Taranaki (14.3%) for the year end September 2016.

Table 7: Taranaki: Commercial Accommodation – Guest Nights - % Change (Y.E. Sept. 2016)



Source: Venture Taranaki (2016).

Taranaki experienced 10.3% growth in guest nights which was higher than the national average of 6.2% as seen in Table 7. Guest nights in commercial accommodation increased in all Taranaki districts with most significant growth of 19.6% in South Taranaki.

South Taranakis desired features along with the tourism industries economic significance outlines the significance of tourism to the area. This year the tourism sector of Taranaki will undoubtedly receive a strong build on visitor numbers as it has been identified by Lonely Planet as ‘the worlds second best region to visit in 2017 (New Zealand Government, 2017). Regular monitoring and reporting of visitor statistics to the area are beneficial for an overview of current trends, none of which were acknowledged by the seabed mining documents.

4.3.4 Marketing of Tourism

Tourism New Zealand is responsible for marketing New Zealand to the world as a tourist destination. It is worth highlighting that if the tourism product in New Zealand degraded due to a lack of sustainable management, it is Tourism New Zealand who will struggle to offer tourism products and complete the task of marketing the country. The West Coast of New Zealand is greatly impacted by the success of the marketing campaigns of Tourism New Zealand who have worked to evolve the “100% Pure New Zealand” marketing campaign over the past sixteen years. All an effort to make New Zealand one of the world's most well-respected tourism brands.

As a location's environment is the key consideration for citizens when deciding on a holiday destination, the marketing campaigns of Tourism New Zealand will encounter severe difficulties in the case of a seabed mining extraction site of the coastline of South Taranaki. This may jeopardise the return of visitors. What tourism appeal will the West Coast have if local stakeholders are not respected and considered accordingly in the management of their tourism destination and marine environment. According to the EU communication on tourism (2013), the competitiveness of the European tourism industry is closely linked to its sustainability. The future of tourism destinations are threatened without proper management.

4.3.5 Taranaki Global Recognition: Worlds second best region to visit 2017

The South Taranaki and Taranaki region as a whole is an expansive and key tourism destination primarily due to its exceptional natural beauty. Taranaki is a highlight on the global tourism platform for 2017.

Figure 2 Lonely Planet Award



Source: New Zealand Government (2017).

The area is receiving a mass of international attention at the announcement that Lonely Planet has judged Taranaki as the worlds second best region to visit in 2017 (New Zealand Government, 2017). This was published in the Best in Travel 2017 publication in October 2016 and is phenomenal recognition from the worlds largest independent guide book. Within the niche sector of film tourism, Taranaki is also recognised globally. The success and potential outcome as a result of any global recognition must be regarded for. The awareness and image of how a tourism destination is portrayed globally must be maintained and improved upon to ensure it matches tourists expectations.

5.0 Conclusion

The TTR Ltd. seabed mining application failed to warrant the comprehensive consideration that tourism requires as an industry which is a major contributor to the national economy and source of employment. The application failed to appropriately include the fundamental ingredient of all destinations, the stakeholders.

The transition towards the sustainable management of tourism destinations is progressing from a transnational to local level. The support mechanisms to facilitate its implementation have been evident from the success of global organisations that worked to develop the Global Sustainable Tourism Criteria for destinations (UNEP-UNWTO, 2005; GSTC, 2008, 2012; EC, 2013). As 2017 is the International Year of Sustainable Tourism for Development declared by the UN, a primary objective for any locations in New Zealand should remain focused on the transition toward the sustainable management of tourism. This could help the New Zealand tourism industry thrive in a positive way while protecting the fragile resources it depends upon. Thereby achieve substantial gain in the aspects of the environment, social and economic benefits to the local community and cultural heritage. Tourism's total contribution to New Zealand GDP is \$22.7 billion with a vision to grow this to \$41 billion by 2025 (MBIE, 2016). It is a priority to safe guard tourism particularly in areas such as South Taranaki which has evidential growth and a positive future as a tourism destination.

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