

Inquiry into the economic and regulatory frameworks for Queensland island resorts

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**SUBMISSION TO THE
INQUIRY INTO THE
ECONOMIC AND REGULATORY
FRAMEWORKS FOR
QUEENSLAND'S ISLAND
RESORTS**



**QUEENSLAND
TOURISM INDUSTRY
COUNCIL**

The Voice of Tourism

Acknowledgement of Country

QTIC acknowledges the Traditional Custodians of the lands on which we work and live. We pay our respects to Elders past, present and future; and extend that respect to all First Nations peoples.

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INTRODUCTION

The Queensland Tourism Industry Council (QTIC) welcomes the opportunity to provide feedback to the Transport and Resources Committee regarding the economic and regulatory frameworks for Queensland island resorts. QTIC anticipates that outcomes from the inquiry will assist with attracting greater reinvestment into Queensland island resorts and streamlining processes for tourism operators. QTIC supports community engagement regarding tourism development, in addition to environmentally sustainable business practices and working in collaboration with Traditional Custodians, as priority issues.

Consultation with members in previous years has revealed that “the land tenure environment for tourism businesses, particularly those that rely on access to protected areas was proving complex, inflexible and costly for operators. It was reported that the lack of certainty, lengthy approval processes, multiple agency responsibilities and disproportionate taxes and charges are powerful deterrents for capital attraction”¹. Queensland island resorts are still facing many of the same challenges today.

QTIC’s work to date on matters relating to island resorts, land tenure, infrastructure arrangements, facilitating First Nations tourism, and co-existence with protected areas include (but extends far beyond) the following:

- 2022 formation of the Queensland Tourism and Conservation Alliance (QTIC, Queensland Conservation Council, Queensland First Nations Tourism Council, Pew Charitable Trusts, Ecotourism Australia, National Parks Association of Queensland) to advocate for expansion and better management of protected areas and boosting ecotourism.
- 2020 development of the *Queensland First Nations Tourism Plan* (following extensive consultation with First Nations peoples, tourism industry stakeholders, and key government departments) and subsequent key deliverables including supporting incorporation of the Queensland First Nations Tourism Council.
- 2017 submission to the Queensland Government Department of Environment and Heritage Protection on the *Draft Queensland Protected Area Strategy*.²
- 2014 submission to the Queensland Government Department of Natural Resources and Mines on the *Queensland state land: Strengthening our economic future* reform.
- Previous participation in the Queensland Government Valuation Reform Reference Group and Great Barrier Reef Marine Park Authority (GBRMPA) Tourism Recreation Reef Advisory Committee.
- Numerous submissions relating to island management plan, development applications, and cultural heritage.

This submission has been prepared following discussion with QTIC members. QTIC has long held an interest in regulatory and economic frameworks impacting tourism, and advocacy on such matters will continue to be a priority for industry.

We look forward to contributing to any future dialogue that arises from this inquiry. For further discussion regarding points raised in this submission, please contact QTIC on (07) 3236 1445 or email policy@qtic.com.au.

QUEENSLAND TOURISM INDUSTRY COUNCIL

QTIC is a not-for-profit, private sector, membership-based organisation representing the interests of Queensland’s tourism and hospitality industry. QTIC works alongside government agencies and industry bodies at a local, state, and national level, to strengthen the voice of tourism in all relevant policy forums. Our membership comprises more than 800 tourism businesses across the state, in addition to

¹ QTIC (Queensland Tourism Industry Council) (2014), [submission \[PDF 394KB\]](#) to the Queensland Government Department of Natural Resources and Mines on the *Queensland state land: Strengthening our economic future* discussion paper.

² QTIC (Queensland Tourism Industry Council) (2020) [submission \[PDF 220KB\]](#) to the Queensland Government Department of Environment and Heritage Protection on the *Draft Queensland Protected Area strategy*, QTIC.



13 Regional Tourism Organisations (RTOs) representing more than 3,000 regional businesses and 10 industry sector associations. QTIC has an extensive reach, with 7,000 total subscribers and a social media following of 25,000 people across four different platforms. QTIC is closely connected to its members and very supportive of the work they do to provide exceptional visitor experiences.

QTIC recognises the invaluable contribution tourism makes to the national economy and local communities. QTIC's efforts are aimed squarely at helping the tourism industry to drive sustainable operational practices, ensure product development, stimulate business attraction and investment, develop workforce skills, and support tourism jobs and business. QTIC provides an independent conduit to bring key stakeholders (including investors, employers, employees, and all levels of government) together to clearly identify challenges and opportunities and provide recommendations for consideration.

RESPONSE

Role of island resorts in attracting new and return visitors to Queensland and the Great Barrier Reef

The Great Barrier Reef is a unique part of the natural environment that greatly contributes to the state and national economy. Prior to the onset of the global COVID-19 pandemic, the Great Barrier Reef boasted "economic, social, and icon asset value of \$56 billion, supports [approximately] 64,000 jobs, and contributes \$6.4 billion to the Australian economy"³. This historic success can be largely attributed to the effective tourism planning and management processes in place, which have resulted in a relative balance between reasonable human use and the preservation of this world-class natural asset.

By extension, Queensland island resorts play a substantial role in attracting new and return visitors to the state and to the Great Barrier Reef. However, it is important to note the impact of the COVID-19 pandemic on island resort operators. The cumulative losses for tourism since the beginning of the pandemic have amounted to a staggering \$146.6 billion nationally.⁴ Queensland has fared less badly than most other states, but in the year ending December 2021, domestic tourism in Queensland was still down 14% compared to an already difficult year before. Domestic tourism helped to mitigate losses in some regions, to a degree, but many businesses were unable to successfully pivot operations. Many island resorts relied on international visitation as a primary source of business (with some indicating up to 40% of bookings). Ongoing co-investment in capability and infrastructure, sustainability and climate change responses are necessary to facilitate return visitation and education for this national icon.

Historical operational status and existing constraints that impact economic development opportunities for island resorts

One of the key constraints relating to operational status for the economic development of island resorts is red tape. Multi-agency or interdepartmental liaisons with overlapping process create a clear challenge for operators. Operational issues and regulatory complexities also affect the potential investment environment for current and future lease holders.

Regarding the regulation of land use in the general Great Barrier Reef Catchment area, Hamman et al. (2022, p. 3) note that "there is no single planning instrument, no decision-making authority which covers both the Commonwealth Marine Park and catchment area in terms of permitted use".⁵ The

³ Deloitte Access Economics (2017), *At what price? The economic, social and icon value of the Great Barrier Reef*, accessed 10 June 2021.

⁴ Austrade (Australian Trade and Investment Commission) (2022) *National Visitor Survey results December 2021*, Tourism Research Australia, accessed 30 March 2022.

⁵ E Hamman, J Brodie, R Eberhard, F Deane and M Bode (2022) 'Regulating land use in the catchment of the Great Barrier Reef', *Land Use Policy*, 115, 10.1016/j.landusepol.2022.106001.



resulting “complex, overlapping patchwork of regulatory coverage” creates unnecessary regulatory challenges, as depicted in the table below:⁶

Table 1
Overview of the regulatory frameworks relating to land use in the GBR’s catchment.

| Regulatory Framework | Legislative Instruments | Objectives | Key Components and Concepts |
|----------------------|---|--|--|
| Planning | Planning Act 2016, Regional Planning Interests Act 2014, Coastal Protection and Management Act 1995. | Integrated system of land use planning and development assessment underpinned by principles of ecologically sustainable development (ESD). | Requirement for a development approval for assessable (and regional) development. Offences for non-compliant development, including clearing vegetation without a permit. Restrictions on removing sand and quarry material in the coastal zone. |
| Major Projects | State Development and Public Works Organisation Act 1972, Economic Development Act 2012. | Facilitation of major public and private infrastructure projects through the declaration of explicitly controlled areas. Driven by desire for economic progress. | Declaration by the state of Coordinated Projects and State Development Areas which fast track development. Declaration of Priority Development Areas (PDAs) within which community objection rights are limited and local planning instruments are overridden. |
| Mining | Mineral Resources Act 1989, Petroleum and Gas (Production and Safety) Act 2004. | To encourage the economic development of minerals and gas in the state, whilst minimising conflicts with other land uses. | Requirement for mining/petroleum lease and other licences for operating resource activities. Extraction and exploration also requires compliance with environmental protection and water use legislation. |
| Water Use | Water Act 2000. | Sustainable management of Queensland’s water resources, including underground water reservoirs. Driven by the principles of ESD. | Requirement for water licence to extract underground water and riverine protection permits required for destruction of vegetation in a watercourse, lake or spring. |
| Pollution | Environmental Protection Act 1994. | Protection of the environment from air, water and soil pollution. | Requirement for Environmental Authority to undertake activities such as mining, aquaculture, intensive animal husbandry, chemical and petroleum production, and food processing. |
| Waste | Waste Reduction and Recycling Act 2011. | Waste avoidance and reduction, minimise the impact of waste on the natural environment | Provides for the introduction of a levy for certain waste as well as reporting and waste tracking requirements. Certain disposal practices are also banned. |
| Vegetation | Forestry Act 1957 Vegetation, Management Act 1999. | Management and ecologically sustainable use of the state’s forested areas and regional ecosystems (woody vegetation). | Establishes a framework for regional ecosystems including ‘relevant purposes’ for which a landholder can clear their land. Works in tandem with the Planning Act 2016 to require assessment and approval. |
| Port Development | Sustainable Ports Development Act 2015, Transport Infrastructure Act 1994. | Management of port-related development in and around the GBR World Heritage Area. | Declaration of priority ports along GBR coast. Prohibition of capital dredging outside of priority ports. Requirement for Master Plan for each port. Restricted entry for port land. |
| Nature Conservation | Marine Parks Act 2004, Nature Conservation Act 1992. | Conservation and sustainable use of wildlife and protected areas in Queensland (national parks, reserves, marine parks etc.). | Offence to take or interfere with native wildlife (plants and animals). Restriction on activities within protected areas such as national parks, marine parks. |
| Cultural Heritage | Torres Strait Islander Cultural Heritage Act 2003, Aboriginal Cultural Heritage Act 2003, Native Title (Queensland) Act 1993. | Protection of cultural heritage places and artefacts throughout the state. Recognition of native title interests in land and waters. | Duty of care established not to harm Aboriginal or Torres Strait Islander cultural heritage. Requirement to negotiate with (and where required, compensate) native title holders. |

While regulation is a necessary process for development in protected areas, it should be accessible, comprehensible, and consistent for those working under its remit. Provision of services should also be equitable and in accordance with fees and charges paid by tourism operators.

The *Jacobs Report*⁷ (2016, p. 7) addresses the annual investment needs of the Great Barrier Reef, “if it were treated as an economically regulated piece of essential community infrastructure”, providing an additional layer of analysis to budget estimates for environmental health and maintenance. It makes the following commentary regarding service provision:⁸

Constructed assets such as dams, irrigation schemes, roads, railways, ports, and wastewater infrastructure have well-documented replacement, depreciation, maintenance and operating cost budgets. A natural asset such as the GBR does not receive capital and maintenance funding commensurate with its ongoing requirements and the value it generates for users and the broader economy.

Recommendations:

- Consistency in fees, terms and conditions, application, and approval processes for all applicable Acts, across Local Councils and State and Federal Governments.
- Funding access for private regional airports to develop infrastructure and increase commercial viability.

⁶ Ibid, p.4-5.

⁷ Jacobs report – Jacobs Australia (2016) [Investing in the Great Barrier Reef as economic infrastructure \[PDF 906KB\]](#), prepared on behalf of QTIC, QFF (Queensland Farmers’ Federation), WWF Australia (World Wide Fund for Nature Australia), AMPTO (Association of Marine Park Tourism Operators), QTIC, p. 7, accessed 6 April 2022.

⁸ Ibid.



- Support for services such as waste management, fire services, roads, infrastructure, and other services, particularly for integrated resorts with private sub-lease holders in private dwellings. Service provision should be equitable across both mainland and island resorts.

How the determination of native title and the aspirations of traditional owners have been incorporated into operations

Australia's First Nations peoples are the oldest living cultures on earth, connecting with Country for tens of thousands of years. The United Nations World Tourism Organisation (UNWTO) estimates that 47% of tourists worldwide are motivated by a desire to experience the cultures and heritage of a country. Tourism also offers viable pathways for sociocultural and employment opportunities, innovative business creation, and entrepreneurial capacity building of First Nations peoples.

The UNWTO report on *Recommendations on Sustainable Development of Indigenous Tourism* notes that this burgeoning tourism sector should be guided by key considerations of respect, consultation, empowerment, equitable partnerships, and protection of natural resources and cultural heritage⁹.

Recommendations:

- Support for partnerships with Traditional Custodians regarding management of protected areas.
- The *Queensland First Nations Tourism Plan* offers a considered guide for future action¹⁰. The plan sets a framework to leverage our First Nations cultural heritage and stewardship of country, together with regions' distinctive mix of tourism product offerings, to inspire the development of a thriving First Nations' tourism sector that offers diverse, authentic and engaging, sustainable tourism experiences and promotes greater engagement of First Nations peoples in tourism.

Infrastructure access arrangements and other challenges for lease holders to develop or redevelop islands for tourist, residential and public purposes

Unique challenges are presented by island resorts that integrate residential sub-leased dwellings. Developments should take a holistic approach to planning and consider the needs of not only the business itself and consumers, but the broader community.¹¹ Adoption of planning models such as 'destination community wellbeing' (DCW) have the potential to facilitate greater community support for tourism activities and enhance long-term commercial viability and incorporate environmental concerns.

Previous QTIC submissions have highlighted the need for multi-use infrastructure, including roads, as "tourism and outdoor recreation are generally not served well by the closure of public roads temporarily or permanently".¹²

Recommendations:

- Planning should aim for a careful balance between strengthening local economies via commercial development and meeting clearly identifiable community needs.
- Incorporation of community infrastructure to support local economic development, employment and benefit from tourism activities.

⁹ UNWTO (2019) [Recommendations on sustainable development of Indigenous Tourism](#), UNWTO, accessed 27 August 2021.

¹⁰ QTIC (2020) [Queensland First Nations Tourism Plan](#), QTIC.

¹¹ G Moscardo and L Murphy (2016) 'Using destination community wellbeing to assess tourism markets: A case study of Magnetic Island, Australia', *Journal of Destination Marketing & Management*, 5(1):55-64, doi: 10.1016/j.jdmm.2016.01.003.

¹² QTIC (Queensland Tourism Industry Council) (2014), [submission \[PDF 394KB\]](#) to the Queensland Government Department of Natural Resources and Mines on the *Queensland state land: Strengthening our economic future* discussion paper.



Co-existence with the protected area estate both onshore and within the Great Barrier Reef Marine Park Area

The continued protection and maintenance of the Great Barrier Reef is needed to protect biodiversity, recognise cultural significance to Traditional Custodians, and facilitate economic development of communities and industry. Collaborative stewardship¹³ is key to success. The tourism industry has a material interest in the long-term sustainable use of the natural resource and can significantly support to ecological health and integrity of World Heritage Areas, thus contributing to 'future proofing' both economy and environment. That supportive relationship was also highlighted in the report of the 2012 UNESCO Reactive Mission to the Great Barrier Reef:

Commercial marine tourism in the Great Barrier Reef is focused on delivering high quality tourism experiences which have significant economic value to the local communities and to Australia. Plans and permitting arrangements targeting commercial marine tourism have been systematically implemented and an array of policies, position statements and guidelines has been developed and are communicated in a clear and transparent manner to the public. As a result of this concerted action, and primarily through the establishment of industry partnerships, commercial marine tourism is now planned and managed sustainably, with minimal environmental and social impacts such as crowding. Through this continuous, effective management, commercial marine tourism is no longer considered as a major threat the OUV of the property, provided current management measures continue¹⁴.

Many tourism operators already abide by strict operation guidelines and work in alignment with conservation objectives to deliver environmental policy outcomes. Tourism operators in the marine park are exposed to the Reef environment every day, allowing for ongoing monitoring and assessment of key tourism sites. Operators have a unique, engaging, and compelling platform to deliver messaging to their guests and encourage individual and collective action to protect the Reef's outstanding universal value. QTIC draws particular attention to the Griffith Institute for Tourism report regarding *Lady Elliot Island eco-resort's transition to 100 percent renewable energy* as providing important insights about sustainable tourism for government and stakeholders.¹⁵

Protected areas are multi-purpose in nature, as places of community enjoyment, sustainable recreation, and tourism use. Sustainable use must be clearly identified as basis for innovative management solutions, resourcing, and community benefit. Tourism activities taking place in protected areas should operate within clear guidelines for sustainable use.

Recommendations:

- Allowances for compatible mixed-use arrangements, including the development and maintenance of tourism-related activities and infrastructure.
- QTIC has made contributions to the *Reef 2050 Long-term Sustainability Plan* and its subsequent review.¹⁶ This strategy is an invaluable document that should be used to guide all future reef-related legislation.¹⁷

¹³ M Dyer, M Newlands, E Bradshaw, and S Hernandez (2020) *Stewardship in the Great Barrier Reef: A review of concepts and definitions of stewardship in the Great Barrier Reef applied to Reef health*, GBRMPA, accessed 16 June 2021.

¹⁴ UNESCO (United Nations Educational, Scientific and Cultural Organization) World Heritage Convention (2012) *Report on the Reactive Monitoring Mission to the Great Barrier Reef (Australia), 6-14 March 2012*, UNESCO, p.24.

¹⁵ S Carter, R Thomas, and P Gash (2020) *Lady Elliot Island eco-resort's transition to 100 percent renewable energy [PDF 1.2MB]*, research report No. 16 prepared for Griffith Institute for Tourism, accessed 7 April 2022.

¹⁶ QTIC (Queensland Tourism Industry Council) (2020) *submission [PDF 440KB]* to the Australian Government Department of Agriculture, Water and the Environment on the *Reef 2050 Long-Term Sustainability Plan review*, QTIC.

¹⁷ Department of Agriculture, Water and the Environment (2021) *Reef 2050 Long-Term Sustainability Plan*, Department of Agriculture, Water and the Environment, Australian Government, accessed 10 June 2021.

OUR CORPORATE NETWORK



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