South Australian Productivity Commission
GPO Box 2343
Adelaide SA 5001

sapc@sa.gov.au

3/9/21

To whom it may concern,

RE: SAPC Tourism Regulation Review Draft Report

On behalf of the Tourism Industry Council South Australia (TICSA), I am writing to provide a submission to the South Australian Productivity Commission (SAPC) Tourism Regulation Review (the Review) Draft Report.

TiCSA is the peak body for South Australia's tourism industry and represents over 1,000 tourism businesses across the state. Our purpose is to advocate for, engage with and strengthen tourism businesses to grow the visitor economy.

We were pleased to engage with SAPC Commissioner Dr Matthew Butlin and staff during the initial consultation for the Review and support the breadth of scope covered in the Draft Report. In particular, we commend the Report's findings and recommendations focus on improving the culture of regulators to one which enables businesses to succeed and thrive, rather than simply seeking to amend regulations. To this effect, we are supportive of all recommendations set out in the Draft Report.

In addition, we offer the following comments:

- Draft recommendation 8.1 – rather than establish new external reference groups, we recommend the report recognises the role of peak industry bodies as being the consultation mechanism to seek input and views on regulatory matters and practice. The recommendation could be left open as to how this is undertaken, thereby allowing flexibility for one-to-one consultation or the option to bring multiple industry bodies together as required.

- Information request 8.2 – we are supportive of the principle of designating an agency as the central coordination point for businesses to engage with to navigate and coordinate between regulators. This 'case management' approach would be valued by industry in that it would reduce the confusion and effort required to navigate the complexities of the different regulations and agencies involved.

In deciding where this lead coordinator function best sits, we recommend that it be the agency that the tourism industry already has the most engagement with – either Department of Environment (DEW) and Water or Primary Industries and Regions SA (PIRSA). There would need to be recognition across all regulatory agencies of the role of the lead coordinator and a commitment to responding to their requests in a timely fashion, with the overarching objective being to streamline regulatory approval and compliance processes rather than add any additional bureaucracy to the already complex process.

- Chapter 2 – *Overview of the tourism sector in South Australia* – In the whole, we agree with the data and analysis presented to describe the state of the tourism sector. However, the first page of this chapter (and repeated elsewhere in the report), states that 'Tourism is a small but significant part of South Australia's economy…' and goes on to present the industry's contribution to Gross State Product (GSP). What this statement and data fails to convey is the contribution that tourism revenue makes to export revenue for the state. Over half of tourism expenditure comes from interstate and overseas (pre-COVID) and is therefore bringing new dollars into the state, not simply recycling money within the state.

- Industry quality accreditation programs – we consider this Draft Report misses the opportunity that industry-run accreditation programs can play is ensuring best-practice standards are met by the industry. These programs often incorporate and go beyond regulatory requirements. There is opportunity for regulators to work with the industry accreditation programs to recognise those businesses who complete accreditation program as meeting regulatory requirements. This would avoid duplication of effort, save the regulators time and energy and therefore incentivise industry to pursue quality accreditation which will elevate them beyond the minimum of simply meeting regulatory requirements. While there may be particular areas which this principle cannot apply, TiCSA is certainly willing to work with regulators to explore where and how our Quality Tourism Framework and accreditation system could be utilised to improve regulatory efficiencies and outcomes.

I welcome the opportunity to discuss any of the comments we have provided with you further. Please feel free to contact me directly on [redacted].

Warm regards,

Shaun de Bruyn
Chief Executive Officer
Tourism Industry Council South Australia (TiCSA)