



Fiji Hotel and Tourism Association

FIJI HOTEL & TOURISM ASSOCIATION

Honorable Mr Faiyaz Koya
Minister of Industry, Trade, Tourism, Lands & Mineral Resources
Civic House
SUVA
2nd March 2017

RE: Submission to: Fijian Tourism 2021

Honorable Minister,

The Fiji Hotel & Tourism Association (FHTA) thanks you and your ministry for the constructive consultations held with our members and respectfully submits the following submissions for inclusion and consideration as the Ministry finalizes the new tourism development plan entitled ***FIJIAN TOURISM 2021***.

There are many strategies in the draft document provided to us (Summary of Strategies) which are highly commendable and the Ministry of Industry, Trade, Tourism is to be congratulated on its collaborative partnership with the private sector to progress the plan.

Summaries do not provide more in depth details therefore it is difficult to fully assess and contribute comprehensively to the FIJIAN TOURISM 2021 plan without this insight. We await the release of the plan and hope that we are able to provide constructive feedback on the details that emerge at that time. In the same vein, we do not comment on several of the summarized strategies in the summary which we fully support, but we hope we may have some further observation or feedback on these once the final document is released.

We also believe that, insofar as it is practicable, the Fijian Tourism 2021 plan should be aligned with the 5-year and 20-year national development plan.

We trust that the following comments will be received in the spirit of partnership and cooperation to add to and enhance the plan.

At the outset, FHTA suggests that the MITT considers whether to establish a **Vision** for the plan and identify its key guiding principles. We propose as examples:

Vision for FIJIAN TOURISM 2021

- To implement sustainable, yield driven strategies to grow tourism demand and financial returns while enhancing the quality of the visitor experience and all Fijians' quality of life.
Or
- Fiji will capitalise on its position as a hub of the South Pacific, encourage high yielding visitation through its diversity of quality tourism product, drawing on its cultural diversity, natural beauty,

friendliness and safety, whilst generating sustainable employment and economic benefits to the widest range of communities and stakeholders throughout the nation.

To include these **Key Principles**

- Sustainability
- Protect our precious environment
- Yield driven
- Celebrate our culture
- Fijian Participation
- Public/Private Partnership

To include **Key Enablers**

- Infrastructure and investment
- Technology
- People
- Research and Development
- Maximising air access

To include **Other Areas of Consideration**

- Prioritisation
- Responsibilities
- Funding details

We also believe that in order to maximize the chances for success of the Fijian Tourism 2021 plan that the Ministry ensure that the final document is **Outcome Focused**. This would ensure that all objectives and strategies have a corresponding outcome so that the progress can be monitored objectively including criteria for success, key performance indicators, and other mechanisms for measuring success of the individual strategies.

Minister, FHTA is cognizant of the substantial investment will be required by both the government and the private sector to achieve the aims of this plan. We cannot stress more that one of the key success factors to encourage private sector re-investment in existing plant and property is to re-introduce a targeted SLIP-like program or enhancing Hotels Aid to ensure that properties are eligible for incentives such as reduction in tax, accelerated depreciation of assets, duty concessions on imports, and the extension of the losses carried forward limitations.

The following comments (in blue) itemized in the relevant areas are the Association's collective commentaries, recommendations and contributions for consideration and attention.

AREA 1: DRIVING DEMAND FOR OUR TOURISM BRAND	
S.1 Tourism Fiji brand promotion	The objective of this strategy is to ensure that Tourism Fiji effectively market Fiji and maximise return on Government's investment with regards to Tourism Fiji's marketing grant
S.1.A Review and realignment of the Fijian Brand	At the second consultation in Nadi the CEO TF mentioned that that TF would undertake quantitative research in Australia, New Zealand and North America. We suggest that the findings of this research and the fine tuning of Fiji's brand values be tested with qualitative research in those three markets, plus China, Asia, UK and Continental Europe.
S.1.B Revitalize tourism marketing strategies	<p>We recommend that a clear terms of reference (ToR) or scope document for the Fiji Tourism Forum be developed so that the industry can provide constructive feedback to other Government Departments, Ministries & Agencies that have an impact on tourism to improve on efficiencies.</p> <p>We believe the Fiji Tourism Forum should be an annual event. It would be an ideal time to reflect on the progress of Fijian Tourism 2021 in broad consultation with the stakeholders</p>
S1.C Strengthen Partnership among Tourism Fiji, Film Fiji, Investment Fiji, Fiji Airways and Industry partners in the promotion of Brand Fiji	The Association believes the inclusion of the relevant industry umbrella associations like FHTA, SOFTA & FITBA with the addition of the other stakeholders should be documented as a fundamental part of the partnership to ensure ownership and success of this plan.
S.2 Grow Off-Peak Season Events	This strategy is to ensure a steady supply of international visitor arrivals to Fiji is maintained throughout the year to address seasonality.
S.2.A Promote International Sporting Events	<p>The opportunities to "Grow Off-Peak Events" extend well beyond high profile International sports events and other sports events. Examples include cultural celebrations, food, wine, music festivals, masters' events like Golden Oldies, family and school reunions, etc. All major events including high profile sports events must have clear KPIs and be assessed and reassessed annually on their ROI.</p> <p>In considering sporting events, the construction of a new stadium should be planned for the western division bearing in mind that there is currently insufficient accommodation available in Suva to host large scale sports events.</p>
S.2.C Promoting Fiji as a MICE destination	Tourism Fiji used to have a "Conventions Bureau". This section could incorporate MICE activities to grow this market.
S.3 Integrate Visitor Information	This thematic area is focused domestically with the objective to create effective awareness of the full range of Fiji's tourism product offerings to encourage visitor spend and complement Tourism Fiji's brand promotion and destination marketing abroad.

S.3.B Establish Tourist Visitor Information Desks	<p>How would these tourist visitor information desks work?</p> <p>Will they take bookings/take commissions/act as inbound travel agent/tour operator?</p>
AREA 2: INCREASING THE VALUE OF OUR TOURISM PRODUCTS	
S.4 Enhance Quality	The objective of this strategy is to grow the value of the industry by improving the quality of Fiji's tourism product offerings. This will be a long term strategy to ensure that Fiji becomes a premium tourist destination in the South Pacific.
S.4.A Encouraging adoption of higher standards for the tourism industry	Noting that we believe that each operator has its own commercial obligations and that decisions on pricing models and policies such as cancellation etc are best left to the individual operators we would appreciate the opportunity to be involved in the establishment of the industry practitioner's guide. We note that FHTA has established guidelines on a variety of issues (FHTA RECOMMENDED PRACTICES FOR BOOKINGS AND CANCELLATIONS) that affect the industry to allow for a degree of standardization but allows for individual operators' discretion.
S.4.B Renew the FIJIAN HOSTS Customer Service Program	FHTA supports the Fijian Hosts initiative. Can MITT advise which an international accreditation will be sought for the Fijian Hosts program?
S.4.C Establish a Code of Conduct for Tour Operators	<p>While the initiative is supported; the concern is that it will create more red tape and licensing and registration issues. We believe it needs to be underpinned by the Code of Ethics used by FHTA.</p> <p>There is concern that this becomes another exercise in inspections from the NFA, Police and Ministries of Health and Labour as tourism operators are already getting 3 visits a year for separate licenses such as Hotel license, Liquor Licence, business certification and the additional surveys required by the maritime industry.</p> <p>We recommend that a more productive, efficient and cost effective procedure would be to have inspections that are required to be carried out being consolidated, so that one inspection per year from the relevant authority can be used by each individual licensing authority.</p> <p>FHTA have a comprehensive Code of Ethics that all members are bound to as a condition of membership: https://fhta.com.fj/about-fhta/fhta-code-of-practices-ethics/ It also contains a detailed disciplinary procedure.</p>
S.5 Support Micro, Small and Medium Tourism Operators	The objective of this strategy is to ensure government supports local MSM tourism operators which will not be able to survive in the modernising and more competitive tourism industry.
S.5.A Facilitate access to international online booking platforms for Small Tourism Operators	<p>We believe the technical capacity exists locally and can be enhanced and supported in cooperation with Tourism Fiji.</p> <p>We do not believe there is an issue with accessing booking platforms as this is easily and readily available to any operator wishing to utilise this in their marketing plan. Local companies are readily available that can set up the correct channel managers in order for small businesses to access booking engines for a minimal fee.</p>

	It is recommended that time would be best utilised with an educational pamphlet to show MSME's how to do this and is considered a commercial issue not a governmental one that could tie up resources that would be better used elsewhere.
S.5.B Use existing Government programs to support tourism MSMEs and urge their gradual transition into higher value services.	<p>We suggest that as well as encouraging new investors, existing investors who have long term investments in small and medium sized accommodation facilities need to be supported with practical one off incentives to reinvest in upgrading aging facilities. Many resort operators (especially the smaller ones) have faced significant hardship in recent years. It should be noted that more than 50% of gross accommodation receipts are incurred prior to the resort delivering the guest's actual room and associated facilities and services. (25% taxes plus up to 25% commission to tour operators, wholesalers and OTAs plus TLTB lease fees etc)</p> <p>Existing small and medium sized resorts outside the luxury category are unable to increase their room rates to the same level as newer resorts can do which will lead to damaging the goal of ensuring that Fiji is seen as a premium destination.</p> <p>Unless these small and medium sized resorts are able to upgrade, the plans strategy to ensure that Fiji becomes a premium tourist destination in the South Pacific will not be achieved.</p>
AREA 3: FACILITATING & PROMOTING FOREIGN AND DOMESTIC INVESTMENT IN TOURISM	
S.6. Promotion and facilitation of investments in the tourism sector	<p>The objective of this strategy is to ensure:</p> <ul style="list-style-type: none"> - Appropriate investments are realized in the tourism sector in Fiji. - Fiji has sufficient capacity to cater for the increasing accommodation occupancy levels.
S.6.A Building capacity at Investment Fiji	<p>Reintroducing SLIP-type investment incentives and refreshing/improving Hotel Aid for existing plants to improve their assets and improve quality/value is also strongly recommended.</p> <p>Assistance is requested to allow losses to be offset for more than four years – especially in the start-up or renovation phase.</p>
S.6.B Promote further by facilitating Tourism Investment Application and Approvals	<p>We would also question the stated growth in occupancy rates. Our information is that the growth in occupancy rates has not been sustained at an annual rate of 4.3% over a period of approximately 10 years. The more relevant statistic is the national occupancy rate which remains less than 60%. Resorts generally (subject to peak and off peak yield) need to achieve more than 55% annual occupancy to breakeven.</p> <p>While we agree that “arrivals” has increased we do not agree that this correlates directly to occupancy levels increasing by a similar percentage due to length of stay and type of visitor among other variables. Further there is ever-increasing room stock coming on line to absorb the increase in visitor arrivals.</p>
S.7 Stimulate Product Diversification and Development	The objective of the strategy is to diversify Fiji's tourism product offerings which have generally been confined to accommodation development

<p>S.7.B Promote Fiji as a cultural hub in the region through theatre and Arts, Musical and Visual Performances</p>	<p>We would believe that meeting this objective will require performance theatres/venues/stages to be constructed, possibly an opportunity for a PPP.</p>
<p>S.7.C Create a World Class Luxury Shopping Experience</p>	<p>Although we would defer to the retailers association and chamber of commerce for their views, we would ask whether we have sufficient visitors at below 1million for this and that we consult widely with the retail associations on the viability of this strategy.</p> <p>Requires reviewing customs duty for better shopping experiences as Duty Free Shopping is far more competitive overseas with added advantage of the option to buy on you way back into your country now.</p>
<p>S.8 Utilize Fiji's Existing Natural, Cultural and Heritage Resources</p>	<p>The objective of this strategy is to utilise the many natural, cultural and heritage resources Fiji has for tourism purposes in a sustainable manner</p>
<p>S.8.A Rejuvenate Existing Natural, Cultural and Heritage Sites for Tourism Use</p>	<p>The association and its members applaud this initiative as Fiji has a number of natural heritage sites. The Protected Areas Map for Fiji produced by the NTF for the Department of Environment provides a listing of all natural heritage places in Fiji many of which have global recognition. Levuka's Historical Port Town is globally recognized on the UNESCO World Heritage List. Fiji needs to capitalize on this as tourism and development in Levuka can bring many benefits if managed appropriately to protect the integrity of the world heritage values of the town. Infrastructure development is key to corporate support for these.</p> <p>Additionally it is critical to recognize, promote and protect the preservation of the Coral Coast Reef/Barrier as a national resource from Korolevu to Natadola under the care of the National Trust of Fiji.</p> <p>Other sites include Momi Battery Historic Park development, the Sigatoka Park and the planned the Waisali Rainforest Park (Savusavu). Other sites in Fiji can be added to this list.</p>
<p>AREA 4: INVESTING IN TOURISM RELATED INFRASTRUCTURE</p>	
<p>S.9 Increase Air Access to Fiji</p> <p>S.10 Increase Capacity on Domestic Flights</p>	<p>The objective of this strategy is to ensure that air access to Fiji is not an inhibiting factor to tourism growth.</p> <p>The objective of this strategy is to address the issue of tourism supply and demand in the outer island regions of Fiji.</p> <p>NOTE WE SEE THESE AS INHERENTLY INTERLINKED.</p>
<p>S.9.A Continue to Increase Connectivity</p>	<p>FHTA fully appreciates that air access with competitive airfares is essential to maximize tourism and is always supportive of Fiji Airways as our National carrier; however, non-Fiji flag carriers should be considered in the Fijian Tourism 2021 plan as they are crucial to our overall success. They are not mentioned in the current summary.</p>

<p>S.10.A Improve flight connections & distribution to important tourism regions</p>	<p>Frequency and capacity from key and emerging source markets is critical.</p> <p>Balancing the benefits of Aviation and Tourism has its challenges when assessing how much protection is desirable for Fiji Airways whilst at the same time encouraging other airlines to invest in services to Fiji and grow the market further.</p> <p>We recommend that having a percentage of visitor traffic being generated by other carriers would be more beneficial to the economy and that TF should be encouraged to work with <u>all</u> carriers who under appropriate ASA's have the regulatory approvals to provide air capacity to Fiji.</p> <p>The MITT can consult with industry associations such as FHTA with the objective of eliminating conflict between Tourism and Aviation policies.</p> <p>A review of current ASA's is recommended – and this should be done periodically throughout the Fijian Tourism 2021 timeline.</p> <p>We also recommend that limited “beyond rights” are at least considered when discussing ASAs or evaluating new possible ASAs (Middle East, Asia)</p> <p>Government should also review the departure tax as it is one of the highest in the world at present</p>
<p>S.11.A Support Essential Airport Developments</p>	<p>The objective of this strategy is to ensure international airports are developed simultaneously with the tourism industry.</p>
<p>S.11.B Implementation of regional airstrip upgrade plans for Fiji's semi tourism growth regions</p>	<p>Domestic services (sea and air) – more coordinated connections between Taveuni, Savasavu and Koro is required to allow better tourism access into these areas to grow the northern markets. This would give tourists a more Fijian experience and would grow the potential and demand for more resorts “off the beaten track”.</p> <p>Encourage frequency and capacity on domestic routes to introduce competition. There aren't many scheduled domestic flights other than Fiji Link. Incentives are recommended for other domestic carriers to operate scheduled services to areas currently under serviced.</p>
<p>S.11.C Plan for a new International Airport in Vanua Levu</p>	<p>The Tourism industry and the communities in Vanua Levu, Taveuni and Rotuma have been requesting investments, assistance and support in all the above mentioned areas for many years and look forward to all these items and issues being prioritized.</p>
<p>S.12 Improve Port Facilities for Cruise Tourism</p>	<p>The objective of this strategy is to ensure that port facilities in Fiji are conducive to the development of the cruise industry .</p>
<p>S. 12.A Invest in a dedicated Cruiseship terminal in Fiji</p>	<p>There are many concerns from the industry around economics of investing so heavily in a dedicated cruise ship terminal – especially if it will result in “fly in, sail out” cruising. The industry fears that this will result in full flights (to bring in 2000-2500 passengers) with no concomitant hotel stays. This would be disastrous – especially outside of our off-season. The industry does not understand the ROI for the country that this would bring.</p> <p>While the majority view is not supportive of a dedicated cruise ship terminal in Lautoka due to its low yield revenue, we agree that at the very least a comprehensive study is required to look into long term benefits to the country and</p>

	<p>weigh both negative and positive impacts.</p> <p>Some segments of the industry believe that if any cruise terminals (improved facilities) are to be developed, it should be considered for areas where traditional tourism demand is low – eg, Savusavu, Suva, Levuka, Lau.</p> <p>We agree that some <u>minor</u> improvements are required for Suva and Lautoka ports to with dealing with high foot traffic in wet tropical conditions.</p> <p>Of key concern is that the international cruise ships pay no STT, EL, VAT or duty and excise and average passenger spends are very low.</p>
S.12.B Conduct maintenance on jetties and build floating pontoon where necessary	A few jetties in Kadavu need maintenance to improve visitor safety. In addition, floating pontoons need to be developed along with canopied gangplanks to allow visitors to travel to and from Lautoka to nearby island resorts. This will drive tourism activity in Lautoka.
S.12.C Undertake a review of all support services for Cruiseships	On fuel standards – a higher quality of diesel fuel is required for all operators.
S.13 Improve Expedition Standards for Yachting in Fiji	The objective of this strategy is ensure that Fiji is a yachting friendly destination, which is much needed for outer islands which do not benefit directly from tourism arrivals.
S.13.A Update Fiji's Marine Charts and Install Navigation Aids at Critical Locations	Our Marine members also fully support and welcome the initiative to update marine charts and install navigational aids. The charts available currently date back to the seventies and in some cases even earlier. Larger companies have already invested heavily on upgraded equipment that are not usable due to the lack of information given on the electronic charts in the Fiji Portfolio. This is an urgent priority as the waterways are the Maritime Industry's roads.
S.13.B Provide better services for yachting	The yachting industry continues to grow as a major revenue earner for the industry while taking the Fiji brand to the high end market around the world. One recommendation is the creation of a customs clearance in Vanua Balavu which would open up Lau and Taveuni to this industry as the current clearance port of Savusavu is too far down wind for many yachts to be able to track back up to these locations. This could create some much needed industry for Taveuni and the Northern islands.
S.13.C Explore locations for establishing fully serviced marinas	We recommend the assistance with setting up more private marinas to encourage competition and provide more options for marine operators.
S.15 Forward Planning for Water Supply, Energy and Sewerage Systems	The objective of this strategy is to ensure that growth in Fiji' is integrated into the Water Supply, Energy and Sewerage Treatment Systems plans.
S.15.A Ensure Future Plans Consider Demand from the Tourism Sector	Can WAF & FEA budget and plan to supply some islands and remote resorts to end the current high reliance and associated costs on generators and desalination plants.

S.15.B Investigate options for improving water supply in outer islands	We recommend considering incentives be provided to resorts without town water to upgrade and improve facilities as these utilities are very expensive infrastructure to develop and maintain.
S.15.C Increase the capacity of sewerage treatment systems	
S.15.D Develop a plan to improve the sewerage systems of outer islands	
AREA 5: STRENGTHENING LINKAGES TO THE TOURISM INDUSTRY	
S.16 Linking Human Resources to the tourism industry	The Objective of this strategy is to strengthen linkage of human resource supply to tourism
S.16.A Establish a scheme for career development and capacity building of Fijians in the industry	There is a current skills shortage for the industry across almost all the required skillsets (operational management, revenue management, human resource management and sales management) and a long lead time to address this with the impact being felt whenever a new property is opened up. Concern has been raised on whether training institutions understand and know how to react to the industry's changing needs despite consistent advice to them from FHTA.
S.16.B Conduct a tourism industry human resource needs assessment	We reiterate the comment that the linkages to the tourism industry should be fostered by outreach to the umbrella associations such as FHTA, SOFTA, & FITBA, etc. Much easier/more efficient to liaise with umbrella organizations than to try to reach all members of the industry – results in fragmented messaging and limited feedback.
S.16.C Support the Tourism Industry by identifying barriers that are impediments for tapping into opportunities in emerging markets	
S.17 Linking Agriculture to the tourism industry	The objective of this strategy is to strengthen the linkage of the agriculture industry to tourism
S.17.B Special Grant and assistance to Farmers	MITT could assist with logistics by providing subsidies or grants. Incentives could be for hydroponic farming, greenhouses and livestock farming etc Could higher demand produce be introduced in lieu of sugar cane farming? Reduce import duties on produce/meats not available in Fiji
S.17.C Improve Synergy Between Stakeholders	Please include Aquaculture as it is another important element. A better understanding is required of the foods that are popular in resorts which can be readily grown locally.

AREA 6: ENSURING CONTINUED SUSTAINABLE DEVELOPMENT OF THE TOURISM INDUSTRY	
S.18 Sustainable Tourism Development Framework	The objective of this strategy is to bring together under a single platform the efforts and commitments of Government and all stakeholders towards the sustainable development of Fiji's tourism industry taking into account Fiji's Green Growth Framework.
S.18.A Conduct a scoping study for the development of a Sustainable Tourism Development Framework	The Association requests more consultation with its members and elaboration on what the <i>Sustainable Tourism Framework</i> involves.
S.18.B Formulate and Implement the Sustainable Tourism Development Framework	It further requests that studies and reports are shared to ensure awareness and best practice methods and information is available to everyone.
S.19 Increase the Standard of Environmental Performance	The Objective of this strategy is to improve environmental compliance of the tourism industry.
S.19.A Strengthen enforcement of the Environmental Management Act (EMA)	Our members have raised concern that no further information has been provided on the use or the application of the Environment Levy and that the levy unfairly targets tourism only.
S.20 Engage in Protection of Reef and Marine Areas	The objective of this strategy is to ensure that protection of the reef and marine areas are mandated by Government.
S.20.A Formalise Government commitment through a Policy accompanied by enabling legislation	<p>Many resorts practice marine protection methods to protect reefs and marine life. These efforts are not always appreciated or supported by local villagers and fisherman who destroy or overfish protected areas on the generally accepted "Qoliqoli rules". Marine environment protection education must be inclusive of local landowners as well so that protected habitats continue to sustain both tourism and benefit the landowners on a long term basis.</p> <p>Of concern in this area too is the effect of unmonitored long-line fishing on both the local fishermen livelihoods and the adventure tourism needs of sports fishing. Meaningful collaboration is required and we recommend that this is with FHTA in addition to Mamanuca Environment Society as not all resorts in the Mamanucas are members of MES</p>
S.21 Promote climate resilient Infrastructure and Energy Efficiency	The objective of this strategy is to encourage climate change preparedness and promote energy efficiency
S.21.A Enforce building codes that promotes climate resilient infrastructure	<p>A better quality of timber to be imported and improvements in timber treatment techniques are required.</p> <p>All existing buildings should be grandfathered to current codes.</p> <p>Welcome incentives to companies bringing in the green building materials as these are usually significantly more expensive and require specialized skills to design and implement, not always available in Fiji.</p>

<p>S.21.B Promote renewable energy utilisation in the tourism industry</p>	<p>There is a need to raise the local standards for all stakeholders & business operators regarding recycling waste with emphasis on proper separation of garbage at landfill sites around the country. Waste separation is practiced as part of recycling efforts on many resorts and hotels to reduce landfill (on islands), storage and the costs of cartage. Efforts are wasted if most landfill sites are not practicing the same nor are local councils encouraging this.</p> <p>Costs for recyclable material and energy efficient products are not as low as they can be or products are unavailable locally. Duty concessions on energy efficient materials would assist.</p> <p>Educational programs to promote recycling, use energy efficient lighting & heating products and to dispose of garbage correctly to ultimately KEEP FIJI BEAUTIFUL are required urgently.</p> <p>The consideration of a credit system (for eg. from the environment levy) to resorts who adopt 'best practice' environment policies eg reef protection, recycling, waste management, carbon emissions, sustainable power development, repairing environmental damage, processes to stop damage occurring, training and monitoring and other ecosystem protection and sustainable tourism practices, etc. This will assist MITT to achieve a sustainable tourism industry.</p> <p>Use of the environmental levy for a KEEP FIJI BEAUTIFIUL type initiative or similar use to make the levy relevant to its existence.</p>
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AREA 7: HAVING A CONDUCTIVE AND UPDATED LEGAL FRAMEWORK

<p>S.24 Formulation of a Tourism Industry Act</p>	<p>Without clear legislative support, the industry will remain fragmented and ad hoc in its development. There is a need for consistency and coordination in order to meet the needs of the tourism industry.</p>
<p>S.24.A Draft a Tourism Industry Act</p> <p>S.24.B Ensure tourism operator compliance to legal requirements and standards</p>	<p>FHTA would greatly appreciate wide industry consultation on drafting the act, understanding its context and need as well as ensuring compliance to legal requirements.</p>

AREA 8: RISK MANAGEMENT

<p>S.25 Identifying Risks associated with the tourism industry</p>	<p>The objective of this strategy is to bring to the forefront all risks associated with the tourism industry ensure its incorporation to crisis management structures</p>
<p>S.25.B Risk Profiling and putting in place appropriate mitigation measures</p>	<p>A food safety standard is required across the industry so that smaller tourism hosts including village based businesses will understand and practice a minimum acceptable standard.</p> <p>Need for ambulances and fire services (or alternative emergency systems) accessibility to tourism activity. Currently the only emergency services testing takes place at airports and maybe ports.</p>

Other risks for identified that require consideration –

1. The negative impacts of cruise ships that far outweigh their benefits:
 - The huge cost of providing adequate Search and Rescue facilities in case of a disaster
 - The cost of oil spill response to limit environmental damage should a large spill occur especially as Fiji does not have the expertise for this
 - The environmental impact of building a cruise terminal in an area covered by mangroves
2. Risks should include geopolitical global financial, economic and environmental elements as well. As well as the impact of adverse weather on the industry as a whole.
3. The vast majority of hotels and resorts are linked to the sea offering transfers, water sports and activities. Fiji’s location in the Pacific is its biggest attraction. We are currently having great difficulty across the industry obtaining certification for our vessels and crew in order to operate our vessels resulting in operators running through commercial necessity, without the correct certification despite going through the correct procedures to obtain said certificates.
4. Operating without the required certificates is a dangerous risk to the industry as the vessels insurance would be invalid should an accident occur. Recommendations on how to mitigate these risks are as follows:
 - 4.1 Delegation of authority from CEO MSAF to MSAF surveyors to be able to issue interim certificates onsite upon successful completion of each survey.
 - 4.2 Increase in annual budget to MSAF to improve the resources available to them through increased staffing and surveyors, as well as the ability to increase wage packages to attract experienced and qualified Marine Operators who have been lured offshore with lucrative salaries
 - 4.3 Installation of MSAF Board of directors to ensure direction is given to CEO MSAF
 - 4.4 Creation of an MSAF Tourism department (similar to Tourism Police), staff to be trained so That they understand the challenges and urgency of tourism operations around Fiji.
5. With the risk of road flooding between the Airport and Denarau it has been recommended that a jetty at the airport should be considered for inclusion for the evacuation and delivery of passengers to/from Denarau and entire Mamanuca Islands.
6. Fiji’s crystal clear waters, pristine reefs and abundant marine life is a major attraction to tourists to the country. To the extent that Fiji is now a world renown dive destination famous for shark dives, soft coral exploration and other dive adventures. Consequently Risk Management within the industry requires that the diving recompression facility at CWM Hospital is available as a critical element to the emergency safety protocols for diving incidents in the country. This is imperative for the growing scuba diving tourism industry, most of which happens in the outer islands away from main stream tourism. This medical facility is critical for tourists, visitors to our shores and the local employees and workers in the dive industry.

Concern is therefore raised on there being only 1 chamber available (in CWM) which is currently non-functional with no date for repair/replacement. We recommend that 2 chambers are required urgently – for both CWM and Lautoka Hospitals.
7. Medical and morgue services are also risk areas requiring review.

<p>S.26 Tourism Crisis Communication Framework</p>	<p>The objective of this strategy is to formalize the TCC framework that ensures the safety and well-being of visitors to Fiji, staff and teams of the Fijian tourism industry during a crisis.</p>
<p>S.26.A Review and</p>	<p>A Tsunami Warning Protocol is required urgently.</p>

finalize the draft Tourism Crisis Communication Guide 2012	A Ministry of Health endorsed Health Warning Program is required where information is quickly and efficiently rolled out on <i>Mosquito Borne Disease Prevention</i> methods and a list of acceptable warning messages allowed to be displayed to visitors to the country on the dangers of Zika, Dengue, etc rather than to only react after diseases have spread
S.6.B Implement the Tourism Crisis Communications Guide	Dissemination of Disaster Preparedness Programs are required consistently and not just after adverse weather disasters Is there a copy available of the Tourism Crisis Communication Framework 2012 – for review and comment by members? In any event FHTA would appreciate a consultative approach to finalizing the TCCF.
S.26.C Institutionalize the Tourism Response Team (TRT)	Police and Tourism Police response time needs improvement and we recommend that a minimum 48 hours turnaround time be implemented for reports handling.
S.26.D Strengthen Collaboration with Key Partners in a Crisis	We reiterate that existing industry groups such as FHTA, SOFTA, FITBA are a key vehicles for communication – especially in a crisis situation.
AREA 9: MEASURING THE PERFORMANCE OF OUR INDUSTRY	
S.27 Establishing Robust Data Collection Methods	The objective of this strategy is to ensure that data collection methods in tourism is modernised and robust in nature
S.27.A Establishing Robust Data Collection Methods	In developing HDCS and implementation we recommend on-going consultations with FHTA. Data collection methods can be streamlined and could be far better coordinated than is done currently.
S.27.B Complete Modernization of the International Visitor Survey	Can a draft copy of the HDCS act be provided for consultation?
S.27.C Undertake a review of the information technology requirements for the IVS	
S.27.D Capacity Building for In-house Reporting of the International Visitor Survey	
S.27.E Establish a Hotel Data Collection System (HDCS)	
S.28 Improving Market Research & Intelligence	
S.28.A Conduct Segmentation	We support research as noted and request that data is shared to assist members in planning.

Research on Fiji's Established & Emerging markets	
S.28.B Research on Competing Destinations for Fiji	

SUPPLEMENTAL COMMENTS

The following comments did not really have an obvious point for insertion in the response to TDP so we include them here for further discussion.

- We note that the report makes no mention of Casinos as a tourism product. Is this an omission or has government's strategy changed?
- Partnership. Tourism is essentially a private sector business. In this, the largest investment is in the accommodation sector where the total investment in Fiji would run to several billion dollars. MITT is encouraged to work in a close consultative partnership with FHTA. The only private sector organization named in the summary is the Mamanuca Environment Society (MES). We would like to see a continuation of the consultative process with FHTA, SOFTA, FITBA, etc.
- Some areas that were not covered in the summary but may be covered in the full plan include:
 - Prioritisation of the plan with a detailed framework of the timing of the activities and roll-out schedule across the five years.
 - Areas of responsibility – who will take care of what
 - Funding details

CONCLUSION

Fiji Hotel & Tourism Association thanks the Ministry for the opportunity to provide these comments and recommendations after consultation with its members and look forward to further collaboration and discussions with the Ministry once the final complete Tourism Fiji 2021 plan has been prepared.

We look forward to working together to achieving the outcomes and objectives outlined in the plan and are hopeful that the industry and the government can be as aligned as possible on the goals of the plan.

We close by reiterating that substantial investment will be required by both the government and the private sector to achieve the aims of this plan. We cannot stress more that one of the key success factors to encourage private sector re-investment in existing plant and property is to re-introduce a targeted SLIP-like program or enhancing Hotels Aid to ensure that properties are eligible for incentives such as reduction in tax, accelerated depreciation of assets, duty concessions on imports, and the extension of the losses carried forward limitations.

We would be keen to elaborate on or discuss in detail the summarized recommendations included for consideration and look forward to meeting with you and your team to go through this when convenient.

Sincerely

Dixon Seeto
PRESIDENT
Fiji Hotel & Tourism Association

Cc: The Permanent Secretary, Ministry of Industry, Trade & Tourism