



PO Box 12122, Suva  
duavatasustainabletourism.org

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The Chairperson  
Standing Committee on Justice, Law and Human Rights  
Parliament of the Republic of Fiji

## Duavata Sustainable Tourism Collective's submission on the draft Climate Change Bill

Earlier this year, our members joined the call from tourism operators globally to declare a Climate Emergency.

<https://www.duavatasustainabletourism.org/duavata-declares-a-climate-emergency/>

We have consistently called for stronger partnerships between the government and the private sector to address climate change and welcome the opportunity to contribute a written submission to the standing committee on justice, law and human rights.

We understand and support the relevant national climate change policies and strategies and seek to align our actions on climate change, natural resource management and protection and ecosystem health and resilience to these policies. Our members include Rivers Fiji which has protected the Upper Navua Conservation Area for twenty years, Barefoot Manta, Lawaki Beach House and Leleuvia Island Resort who support communities to protect and monitor marine conservation areas and Nukubati Island Resort, a pioneer in developing solar systems in Fiji and who have operated on solar for 25 years. All of our members are founded on principles of environmental and cultural heritage conservation and support partner communities to protect the resilience of their resources.

We would like to provide comments in relation to the Climate Change Bill from the perspective of small, environmentally conscious, tourism operators. On Friday September 3rd we organised an informal talanoa with members of the Collective and other private sector institutions including the Fiji Hotel and Tourism Association, the Sustainable Sea Transport Initiative, Clay Energy and other interested people. This submission reflects some of our collective views though it should be noted that we do not in any way seek to represent their stakeholders.

### **Commitment to strong and robust private sector consultations**

Climate action cannot be delivered without the private sector. We would urge the government to reinstate the requirement that a private sector advisory committee be established by changing the wording from 'may' to 'must' in section 92 to ensure adequate and effective measures and instruments are designed and implemented.

### **Reform ECAL to apply to all industries**

As small and medium operators in the tourism sector we know that our ability to operate is founded on effective natural resource management.

We suggest that ECAL should apply broadly across manufacturing, export, transport, energy and other high emitting sectors. The tourism sector is not always a large emitter and we are all engaged in educational and conservation related activities that contribute to improved awareness about the importance of climate action. We believe that operators in other sectors of the economy should also contribute to addressing the climate crisis.

### **Reform ECAL to act as a driver for behaviour change**

If we want to use new instruments, some of which are mentioned in the draft Bill, the most straightforward way to do this is to reform ECAL now and give the tourism industry certainty that when it is increased again it will be applied to emissions NOT revenue. There are no behavioural change aspects to the way it is applied on sales. Applying ECAL to emissions (or energy) from 2023 would drive significant behaviour change and a shift to solar within the economy. It would also meet the needs of improving the Government GHG inventory and reporting requirements under the Paris agreement.

A carbon pricing mechanism helps to ensure that emission reductions take place where it is cheapest for them to occur.

### **Incentivise the provision of information**

The draft Bill anticipates additional reporting requirements on the private sector to provide information relating to emissions. We believe that there are ways to incentivise the private sector to report emissions data - either by reforming ECAL to apply it to emissions or making ECAL revenues accessible to all for those that are reporting emissions.

### **Recognising the existing overly bureaucratic business environment**

Wherever possible, mechanisms to require businesses to share information should be done in as streamlined a way as possible by adjusting existing instruments and not creating new ones. Fiji has a complicated business environment and adding complexity to the existing situation could result in implications for jobs, revenue and tax receipts.

### **Align provisions with the Environment Management Act**

Further consultation is needed with private sector stakeholders to support them in understanding the implications to the bill in relation to the Environment Management Act (EMA) and in particular provisions that relate to monitoring and enforcement of EMA. Would there be an opportunity to streamline EIA assessment processes to incorporate some of what is needed to implement the climate change bill successfully?

**Protecting our oceans**

Many tourism businesses and communities depend on a healthy ocean. We understand that a previous draft included a moratorium on Deep Sea Mining and would urge that this be reinstated.

We look forward to your consideration. Please do not hesitate to get in touch if you have any queries on this submission or would like further details of our respective involvement in climate change and environmental conservation measures.

Yours sincerely,

Colin Philp (Co-Chair)

Resort Manager, Leleuvia Island Resort, E: [colin@leleuvia.com](mailto:colin@leleuvia.com)

Kasi Taukeinikoro (Co-Chair)

Director, Rivers Fiji, E: [director@riversfiji.com](mailto:director@riversfiji.com)

Marita Manley (Secretary)

Director, Talanoa Treks, E: [marita@talanoa-treks-fiji.com](mailto:marita@talanoa-treks-fiji.com)

On behalf of the wider Duavata membership, which includes:

Leleuvia Island Resort, Rivers Fiji, Talanoa Treks, Takalana Bay Retreat and Dolphin Watch Fiji, Uprising Beach Resort, Lawaki Beach House, Nukubati Resort, KokoMana, Waitika Farm, Namosi Eco Retreat, Drua Experience (Sailing for Sustainability),