



## Tourism

### Overview

- 2.1 Tourism has long been considered a potential cornerstone of a diversified Indian Ocean Territories (IOT) economy. Christmas and the Cocos (Keeling) Islands' attractive landscapes, rare animal and bird life, and unique cultures are considerable drawcards. However, like other remote Australian destinations, the development of a vibrant tourism sector in the region faces significant challenges. These challenges are compounded by the territories' unique governance arrangements and the presence of immigration detention operations on Christmas Island.
- 2.2 Overcoming these barriers will require close collaboration between Commonwealth and local governments, industry and the community. This chapter looks at opportunities to work together to boost promotion and marketing of the region and revitalise the territories' reputation as a premier holiday destination.

### Chapter outline

- 2.3 The chapter begins by describing tourism in the IOT, highlighting the region's considerable natural and cultural drawcards and providing a typical visitor profile. Some of the barriers to tourism, including long-standing limitations are identified.
- 2.4 The chapter examines how access to reliable visitor data can support tourism sector growth. It considers the potential for additional assistance to grow tourism, as well as the prospects for establishing direct air

services to Asia. It concludes by considering difficulties associated with obtaining property insurance in the IOT.

## Tourism in the Indian Ocean Territories

### Attractions

- 2.5 The Director of National Parks said that Christmas Island is recognised internationally for its 'extensive seabird populations and the world's most diverse and abundant array of land crab species.'<sup>1</sup> It offers visitors the chance to experience internationally significant biodiversity:

Christmas Island has the greatest diversity and abundance of land crabs on Earth, with the most notable species being the endemic red crab, internationally known for its annual breeding migration when tens of millions migrate from the forests to the sea to breed.<sup>2</sup>

The wildlife on Christmas Island is very cooperative in that it is there. The minute you step off the plane you see it. It is not nocturnal... The birds are amazing, the crabs are incredible. The rainforest and the opportunity to actually be in the rainforest so quickly, and have it accessible is amazing. So it is a fantastic ecotourism opportunity.<sup>3</sup>

- 2.6 According to the Christmas Island Tourism Association (CITA), Christmas Island's annual red crab migration is the major attraction for international tourists:

...the red crabs draw in people from far and wide.<sup>4</sup>

- 2.7 Although less diverse, the natural environment on the Cocos (Keeling) Islands is no less attractive, boasting a rare example of a pristine Indian Ocean atoll in North Keeling Island:

[North Keeling Island] is one of the few Indian Ocean atolls free of rats and other introduced mammals; its intact vegetation and pest-

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1 Director of National Parks, *Submission 14*, pp. 2-3.

2 Director of National Parks, *Submission 14*, pp. 5.

3 Ms Sally Barnes, Director of National Parks, Parks Australia, *Committee Hansard*, Canberra, 25 June 2015, p. 5.

4 Ms Karenn Singer, Manager, Christmas Island Tourism Association, *Committee Hansard*, Canberra, 13 August 2015, p. 7.

free status means it is a major nesting site for frigates, boobies and other seabirds.<sup>5</sup>

- 2.8 Visitors to the Cocos (Keeling) Islands have access to wind surfing, lagoon canoe tours, and guided atoll walks.<sup>6</sup>
- 2.9 In addition to its considerable nature-based drawcards, the IOT is home to a mix of Cocos and Christmas Island Malays, Chinese and European populations with their distinctive blend of language, cuisine and customs.<sup>7</sup>

### Ecotourism potential

- 2.10 The Director of National Parks referred to the potential for eco-tourism activities on Christmas Island and stated that it already supports some activities in this regard, namely Bird and Nature Week.<sup>8</sup>
- 2.11 Ms Sally Barnes, Director of National Parks outlined the range of eco-tourism activities that Parks Australia envisages for Christmas Island. She stated that guidelines were developed to test the market late in 2015 to gauge interest from prospective operators for establishing an eco-tourism development in the national park:
- ...it is about giving people the opportunity to appreciate the natural and cultural values. So a lot is around the immersion experience, as well as visiting as day visitors, and actually waking up in the park in a very low-key sustainable type arrangement and hearing the birds and being in the forest... We need to be clear about what would be appropriate.<sup>9</sup>
- 2.12 In February 2016, Parks Australia called for expressions of interest via a dedicated website with guiding documentation and an accompanying Youtube video. The website referred to the extraordinary natural assets on Christmas Island and the opportunities open to adventurous operators:

A rare chance to establish eco-tourist accommodation or other visitor experiences within the national park itself is on offer.<sup>10</sup>

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5 Director of National Parks, *Submission 14*, p. 3.

6 Mr Julian Yates, *Submission 4*, pp. 8-9.

7 Christmas Island Tourism Association, *Submission 26*, p. 11.

8 Director of National Parks, *Submission 14*, p. 11.

9 Ms Sally Barnes, Director of National Parks, Parks Australia, *Committee Hansard*, Canberra, 25 June 2015, pp. 6-7.

10 Parks Australia, *Christmas Island Expression of Interest*, <http://eoi-christmas.parksaustralia.gov.au/about-eoi>, viewed 2 February 2016.

## Committee comment

- 2.13 The Committee is pleased to see the Expression of Interest call for eco-tourism in Christmas Island National Park. This is a real chance to add to the tourism offering in the IOT, and increase visitor numbers.

## Visitor profile

- 2.14 As there is no formal system of data collection on visitors to the IOT, it is impossible to obtain accurate and validated information on the visitor profile and numbers. CITA said that most visitors to Christmas Island are domestic travellers from Australia. The exception to this is during the crab spawning season, when 70 per cent of tourists on island are international and 30 per cent are domestic visitors.<sup>11</sup>

- 2.15 The Cocos (Keeling) Islands Tourism Association (CKITA) advised that approximately 10 per cent of their visitors are international.<sup>12</sup> According to CKITA their domestic visitors, who make up the remaining 90 per cent of visitors to the islands, generally live within driving proximity to Perth:

...we have visitors who are perhaps 40 years of age and greater. They normally have a good disposable income. With the relatively high costs of coming to us we are not looking at your average Bali traveller. We get more family visitations during the school holiday period, but other than that it is generally couples with an interest in our drawcards, whether that is the nature base – diving, surfing – or the culture...<sup>13</sup>

- 2.16 CITA described a comparable visitor profile for Christmas Island:

...high-income people who have done a lot of travelling, want something different, want something 'braggable' – like nature, like photography, like diving... Usually a lot of the market is from [WA] because that is our key gateway. We also do have people coming from the east coast, especially for the special events which we promote, such as Bird and Nature Week.<sup>14</sup>

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11 Mrs Karenn Singer, Manager, Christmas Island Tourism Association, *Committee Hansard*, Canberra, 13 August 2015, p. 7.

12 Mr Dieter Gerhard, Chairperson, Cocos (Keeling) Islands Tourism Association, *Committee Hansard*, Canberra, 13 August 2015, p. 7.

13 Mr Dieter Gerhard, Chairperson, Cocos (Keeling) Islands Tourism Association, *Committee Hansard*, Canberra, 13 August 2015, pp. 6-7.

14 Ms Karenn Singer, Manager, Christmas Island Tourism Association, *Committee Hansard*, Canberra, 13 April 2015, p. 7.

## Barriers to tourism

- 2.17 Many of the limitations impeding the growth of tourism in the IOT are long-standing and have been acknowledged in previous reports of this Committee. These include:
- the high cost of transport to the IOT and the high on-island costs;
  - the capacity of utilities like electricity and water to cope with a fluctuating population;
  - the limited availability of plane seats and accommodation of consistent quality; and
  - the standard of visitor attractions such as the National Park on Christmas Island, that may not be as well-developed as those on the mainland.<sup>15</sup>
- 2.18 Submitters to the current inquiry made similar observations. The Director of National Parks noted that Christmas Island has higher on-island and access costs than tourist destinations in Asia, and suggested that visitor amenities are largely outdated and ill-equipped to deal with increased tourism:
- In general, however, visitor amenities and infrastructure across the island are outdated and close to, or beyond their safe and functional lifecycle...many of the visitor current infrastructure and facilities would not effectively cope with larger numbers of tourists.<sup>16</sup>
- 2.19 In addition to these long standing limitations, the Committee heard that tourism in the territories is hindered by:
- the lack of visitor statistics;
  - the territories' unique governance arrangements;
  - media coverage of immigration detention operations;
  - the reliability, affordability and convenience of air access to the region;
  - restrictive land management practices; and

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15 Joint Standing Committee on the National Capital and External Territories, *Inquiry into the Changing Economic Environment in the Indian Ocean Territories*, March 2010, pp. 75-89.

16 Director of National Parks, *Submission 14*, pp. 7-9; Ms Valerie Coleman, *Submission 5*, p. 1; Mr Signa Knight, private capacity, through Mr Mohammed Minkom, Communications Officer, Shire of Cocos (Keeling) Islands, *Committee Hansard*, Cocos (Keeling) Islands, 8 April 2015, pp. 25-26.

- insurance.

2.20 Each of these challenges is considered below, except for land management, which is the subject of Chapter Four of this report.

## Visitor statistics

2.21 CITA said reliable visitor data is an important enabler for the development of tourism in the IOT:

For tourism to develop we need to attract private investment. Private investors need... data...<sup>17</sup>

2.22 Data on the number and type of visitors entering a region enables tourism operators to predict and prepare for peaks and troughs in business, develop a better understanding of what visitors want (and do not want), and more effectively target marketing to increase tourism. It can also be used to attract tourism investment and inform development decisions.<sup>18</sup>

2.23 On mainland Australia, visitor data is collected by Tourism Research Australia (TRA), 'Australia's leading provider of quality tourism intelligence across both international and domestic markets.'<sup>19</sup> TRA conducts annual National and International Visitor Surveys which provide a snapshot of tourism around the nation.<sup>20</sup> According to TRA, the number of survey respondents who have visited the IOT for tourism is too few to register in the surveys' results.<sup>21</sup>

2.24 Tourism associations of the IOT rely on anecdotal information about visitor numbers. CITA said:

The tourism associations run their own visitors' centres, so there is a general sense of when there are more tourists on the island.<sup>22</sup>

17 Christmas Island Tourism Association, *Submission 26*, pp. 3-5.

18 Queensland Government, *Tourism Data and Statistics*, <https://www.business.qld.gov.au/industry/tourism/tourism-in-queensland/tourism-data-source-markets/tourism-and-queenslands-economy>, viewed 14 September 2015.

19 Tourism Research Australia, *website*, <http://www.tra.gov.au/>, viewed 18 January 2016.

20 Tourism Research Australia, *International Visitor Survey Methodology*, <http://www.tra.gov.au/research/international-visitor-survey.html>, viewed 18 January 2016; Tourism Research Australia, *National Visitor Survey Methodology*, <http://www.tra.gov.au/research/national-visitor-survey.html>, viewed 18 January 2016.

21 Customer Service Officer, Tourism Research Australia, *personal communication by telephone to the secretariat*, 9 October 2015.

22 Ms Lisa Preston, Chairperson, Christmas Island Tourism Association, *Committee Hansard*, Canberra, 13 August 2015, p. 8.

- 2.25 CITA and CKITA suggested that the current air services provider, Virgin Australia, or staff managing the region's airports are well placed to collect more visitor data with oversight of the only two entry and exit points in the territories:

Ideally passenger data such as numbers and demographics would be collected as part of the air services/airport management contractual arrangements with the Australian Government.<sup>23</sup>

This relies on the goodwill of the airline and the ability to compare against overall passenger movement data but will provide a more robust outcome than previous attempts at data collection.<sup>24</sup>

- 2.26 CITA advised it had approached Virgin Australia about the possibility of administering a short visitor survey on inbound flights:

CITA is currently working with Virgin Australia to gather some basic statistics on passenger numbers. The concept... involves the air crew handing out a card with the Australian Incoming Passenger Card and then being collected upon arrival at the Christmas Island Airport. CITA will then collate the data.<sup>25</sup>

## Committee comment

- 2.27 The Committee recognises that collecting reliable visitor data is critical to the development of tourism in the IOT.
- 2.28 The current air services contract with Virgin Australia is due to expire in July 2016 and work to select a provider to deliver air services from 1 August 2016 is underway. It is the Committee's view that DIRD should require air carriers to make the collection of visitor data part of the provision of air services to the IOT.

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23 Christmas Island Tourism Association and the Cocos (Keeling) Islands Tourism Association, *Submission 45*, p. 4.

24 Christmas Island Tourism Association, *Submission 26.1*, p. 1.

25 Christmas Island Tourism Association, *Submission 26.1*, p. 1.

## Recommendation 1

**The Committee recommends that the Department of Infrastructure and Regional Development require air carriers to the Indian Ocean Territories to distribute a visitor information card to all passengers for the purpose of collecting visitor data. The completed cards will be deposited in a marked box at the airport arrival terminals on Christmas Island and West Island for collection by the Christmas Island and Cocos (Keeling) Islands Tourism Associations.**

## Indian Ocean Territories tourism associations exclusion from mainland tourism structures

### Budget

- 2.29 CITA and CKITA manage the Christmas Island and Cocos (Keeling) Island visitor centres respectively. They are directly funded by the Commonwealth Government, through DIRD, and managed by a mix of paid and volunteer staff. This differs from State Tourism Organisations which are funded by state governments.
- 2.30 Mrs Juliane Bush, Marketing Manager, CKITA said that their budget was approximately \$250,000 a year from the Australian Government:
- That money goes towards the operation of the visitor centre that you may have seen over at West Island. It also helps support a marketing program that we operate. We have a committee which is based on volunteers taken from our membership. We are a not-for-profit organisation as well... So our staff is currently made up of one full-time visitor centre manager, who is responsible for front of house, approximately two to three casual support tourism staff officers, and me, as marketing manager, and I am on a part-time basis.<sup>26</sup>
- 2.31 Ms Karenn Singer, Manager, CITA said that their budget was about \$400,000:

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26 Mrs Juliane Bush, Marketing Manager, Cocos (Keeling) Islands Tourism Association, *Committee Hansard*, Cocos (Keeling) Islands, 8 April 2015, p. 1.



Around \$300,000 of that goes towards marketing and the rest towards support services. Without the support services, we could not do the marketing. We also raise our own income to support wages through the visitor information centre. It operates as a shop, takes bookings so that we do have commissions and also takes a very small amount from our membership base.<sup>27</sup>

2.32 Mrs Bush stated that CKITA is not funded to attract a broad skills set:

We currently have the skills set of destination marketing. However, we do not have the skills set in economic development when it comes to tourism specifically.<sup>28</sup>

## Service Delivery Arrangement with Tourism Western Australia

2.33 CITA explained that the IOT tourism associations lie outside the arrangements that DIRD has with the WA Government to deliver state-type services in the IOT. There is no Service Delivery Arrangement (SDA) with Tourism Western Australia (Tourism WA).<sup>29</sup>

2.34 CKITA expanded on why there is no tourism SDA:

I believe there were negotiations possibly five to seven years ago with Tourism WA and, for whatever reason, the negotiations were not continued and therefore an SDA was not established with Tourism WA. ...I understand from a [WA] Government point of view, we are not state tax payers. The money that Tourism WA uses to market [WA] as a destination comes from state taxpayers - and we do not contribute...<sup>30</sup>

2.35 DIRD confirmed that the Australian Government previously discussed the establishment of an SDA with Tourism WA, for assistance with promotion and marketing of the IOT. According to DIRD, Tourism WA had advised of limited capacity to promote destinations outside of its state jurisdiction. DIRD said that benefits could ensue through an SDA:

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27 Ms Karenn Singer, Manager, Christmas Island Tourism Association, *Committee Hansard*, Christmas Island, 9 April 2015, p. 14.

28 Mrs Juliane Bush, Marketing Manager, Cocos (Keeling) Islands Tourism Association, *Committee Hansard*, Cocos (Keeling) Islands, 8 April 2015, p. 11.

29 Ms Karenn Singer, Manager, Christmas Island Tourism Association, *Committee Hansard*, Christmas Island, 9 April 2015, p. 14.

30 Mrs Juliane Bush, Marketing Manager, Cocos (Keeling) Islands Tourism Association, *Committee Hansard*, Cocos (Keeling) Islands, 8 April 2015, p. 11.

...through other professional services and/or advice in areas such as destination marketing, events tourism, industry development and accreditation, and visitor servicing.<sup>31</sup>

- 2.36 CKITA said that the exclusion of the IOT from mainland tourism associations makes it difficult to develop tourism:

Basically, as a tourism association, what we are trying to achieve here on the island is a mixture of all of those organisations that occur on the mainland that regional destinations on the mainland are privileged to receive. We are not the only ones in this situation. Christmas Island is also in the same position, as well as Norfolk Island. ...and that I think is a big detriment to the future long-term strategic direction of tourism on Christmas and Cocos, and on Norfolk Island as well.<sup>32</sup>

- 2.37 CKITA alluded to other implications of not being part of a state tourism body; namely not being part of developing tourism throughout the region.<sup>33</sup>

## Regional tourism associations

- 2.38 Regional tourism associations, such as Australia's North West Tourism, work with state tourism bodies and local operators to improve tourism products in their jurisdiction. They are funded through a combination of membership and state government funding.<sup>34</sup>
- 2.39 In the absence of being part of a dedicated regional tourism body, CITA and CKITA have said they work together on regional promotion and marketing.<sup>35</sup>

## Australian Tourism Data Warehouse

- 2.40 The Australian Tourism Data Warehouse (ATDW) is an important digital content distribution platform for the Australian tourism industry. It makes

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31 Department of Infrastructure and Regional Development, *Submission 36.4*, p. 7.

32 Mrs Juliane Bush, Marketing Manager, Cocos (Keeling) Islands Tourism Association, *Committee Hansard*, Cocos (Keeling) Islands, 8 April 2015, p. 3.

33 Mrs Juliane Bush, Marketing Manager, Cocos (Keeling) Islands Tourism Association, *Committee Hansard*, Cocos (Keeling) Islands, 8 April 2015, p. 11.

34 Winemakers' Federation of Australia, *Tourism Organisation Services*, <http://www.wfa.org.au/index.php/resources/wine-tourism-toolkit/developing/working-with-others/tourism-organisation-services/>, viewed 8 December 2015.

35 Christmas Island Tourism Association and the Cocos (Keeling) Islands Tourism Association, *Submission 45*, pp. 4-5.

over 35,000 Australian tourism product listings available for publication across geographical boundaries.<sup>36</sup> The IOT is not currently promoted through the ATDW because the region remains unaffiliated with Tourism WA, and it is the state tourism bodies that select content for inclusion in the warehouse:

[State tourism associations, such as Tourism WA, usually] select and manage the feed of accommodation, tourism experience and other products that make it onto that tourism database.<sup>37</sup>

2.41 CITA said inclusion in the ATDW would extend the reach of tourism:

It is anticipated that, once Australia's island territories are included, this will flow through to Tourism Australia and these islands will be recognised on the Tourism Australia website, which will help drive tourism traffic.

These steps will enhance our ability to sell to a global market.<sup>38</sup>

2.42 Tourism Australia offered to advocate for the territories' inclusion in the ATDW:

...we are happy to work and advocate on behalf of the territories in terms of access to the ATDW, to ensure we can make the most of the opportunities available, especially with content.<sup>39</sup>

2.43 Inclusion of the IOT in the ATDW is being progressed. CITA stated:

[The] ATDW have advised their intention to include an external territories section on their new IT platform which will cover Christmas, Norfolk and Cocos (Keeling) Islands and provide similar content management arrangements provided to regional tourism organisations. This is still subject to board approval.<sup>40</sup>

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36 Australian Tourism Data Warehouse, *About Us*, <http://www.atdw.com.au/aboutus>, viewed 2 September 2015.

37 Mr Tim Mahony, Government and Media Relations Manager, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, p. 3.

38 Ms Karenn Singer, Manager, Christmas Island Tourism Association, *Committee Hansard*, Canberra, 13 August 2015, p. 2.

39 Mr Tim Mahony, Government and Media Relations Manager, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, p. 9.

40 Christmas Island Tourism Association, *Submission 26.1*, p.1.

## Tourism Australia

- 2.44 Tourism Australia coordinates the marketing and promotion of Australia internationally. It manages the consumer orientated website Australia.com, the Australian Tourism Exchange (ATE) trade show, as well as promotional tools such as the Aussie Specialist Program (ASP). Tourism Australia is funded by the Commonwealth.<sup>41</sup>
- 2.45 Tourism Australia said it is focused on international, not domestic tourism (which is the main market of the IOT). However, it is willing to assist the tourism associations of the IOT where it can.<sup>42</sup>
- 2.46 Tourism Australia invited CITA and CKITA to participate in a range of its initiatives including the promotional website, Australia.com; the ATE; and the ASP.<sup>43</sup>

## Australia.com

- 2.47 Tourism Australia's website Australia.com is a key component of their digital marketing. The consumer-oriented website offers prospective tourists information on travelling in Australia and promotes the attractions and unique experiences available in different regions of the country. Travellers can find out more about different destinations by clicking on an interactive map of Australia or by conducting a search of the website.<sup>44</sup> However, the website does not currently feature Christmas or the Cocos (Keeling) Islands because content is largely drawn from the ATDW, which does not cover the IOT.<sup>45</sup>
- 2.48 During the inquiry, Tourism Australia signalled that work is underway to include the IOT in online destination maps:

Tourism Australia is currently refreshing content on its consumer website Australia.com including the key map on the website. The

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41 Mr Tim Mahony, Government and Media Relations Manager, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, pp. 1-4; Mr Leigh Sorensen, General Manager Industry Relations, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, pp. 7-8; Tourism Australia, *Submission 47*, pp. 1-2.

42 Mr Tim Mahony, Government and Media Relations Manager, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, pp. 1-10; Mr Leigh Sorensen, General Manager Industry Relations, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, pp. 1-10.

43 Mr Tim Mahony, Government and Media Relations Manager, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, pp. 4-10.

44 Tourism Australia, [www.Australia.com](http://www.Australia.com), viewed 4 September 2015.

45 Mr Tim Mahony, Government and Media Relations Manager, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, p. 3.

next version of the map will include the external territories. This should be completed in the next six months in line with the broader Australia.com content project.<sup>46</sup>

- 2.49 Further, Tourism Australia offered to assist CITA and CKITA to prepare searchable and promotional content for inclusion on the website:

What we need is to be able to improve the searchability of the external territories. We are very open to working with the Administrator and tourism associations of both islands to identify the tourism product that is export ready and build some itineraries and content pages around the itineraries and product so that we can include and improve our pages and the representation of the external territories.<sup>47</sup>

## Australian Tourism Exchange

- 2.50 Tourism Australia's ATE is the nation's largest annual tourism trade event. It brings together approximately 500 Australian businesses to showcase their products directly to tourism wholesalers and retailers from around the world, through a combination of networking events and scheduled business appointments. Approximately 700 buyer delegates from over 30 countries attend the event, alongside over 80 international and Australian media outlets.<sup>48</sup>

- 2.51 Tourism Australia noted that CITA and CKITA attended the ATE in 2013 and 2014, and participated in an international media program in the lead up to the 2015 event.<sup>49</sup> Tourism Australia alluded to the benefits of Christmas and the Cocos (Keeling) Islands' yearly engagement with the ATE:

I... think that having Christmas Island... and Cocos represented through the Australian Tourism Exchange is an important strategic move for both destinations. The exposure to international buyers is extremely valuable, and getting your best product in front of those buyers is, I think, a critical part of any international

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46 Tourism Australia, *Submission 47*, p. 1.

47 Mr Tim Mahony, Government and Media Relations Manager, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, p. 4.

48 Tourism Australia, *About Australian Tourism Exchange 2015*, <http://www.tradeevents.australia.com/te03/eventModule/home.do?eventModuleId=28799>, viewed 27 August 2015.

49 Tourism Australia, *Submission 47*, p. 1.

marketing strategy that you might have. Again, development of quality product is the key there.<sup>50</sup>

## Aussie Specialist Program

2.52 Tourism Australia's ASP is an online course which equips travel agents from around the world with the knowledge and skills to sell Australian tourism products more effectively.<sup>51</sup> Approximately 30,000 travel agents have access to the program and around 18,000 of these have completed the course and qualified as 'Aussie Specialists.' According to Tourism Australia, the ASP is currently being updated, providing a good opportunity to update material on the IOT and increase exposure to international travel retailers:

The [ASP] website... was in bad need of an upgrade; it was not very interactive; it was quite static in the way it was presenting information et cetera – and so that has been going through a major overhaul... There will be opportunities, though, for the external territories to provide us with information that can go up... You can present video information directly to agents via our training program as well, to train them about how to sell and what is available on the island.<sup>52</sup>

2.53 Tourism Australia said it will assess the Christmas and Cocos (Keeling) Islands tourism offerings to determine whether they are suitable for inclusion in the ASP:

...an assessment will be made of the local tourism product, access, safety etc. If appropriate, work may begin in developing an ASP module for the IOT, however they must meet the strict criteria for inclusion in the ASP.<sup>53</sup>

2.54 CITA and CKITA could then provide additional content to encourage travel agents to promote the region:

What we encourage our operators to do are just little things: for example – this is not something that is high tech – filming yourself talking about your product on your iPhone and sending that

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50 Mr Tim Mahony, Government and Media Relations Manager, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, p. 4.

51 Tourism Australia, *Aussie Specialist Program*, <http://www.tourism.australia.com/programs/aussie-specialists-program.aspx>, viewed 12 February 2016.

52 Mr Leigh Sorensen, General Manager Industry Relations, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, p. 7.

53 Tourism Australia, *Submission 47*, p. 1.

through to us as a clip that we can then send out to these travel agents so they can understand what that particular product is all about.<sup>54</sup>

- 2.55 Tourism Australia noted that the ASP could be used to attract travel agents to the islands by offering special deals through the program:

In turn, they can also provide offers for travel agents when they are coming down for their own holidays to go to visit the islands on specials... So, I think there will be some enormous opportunities coming up. That is just a case of [CITA and CKITA] ... getting in touch with our Aussie Specialist team in Sydney, which we are happy to coordinate if they do not already know them.<sup>55</sup>

- 2.56 Tourism Australia offered to have a discussion with CITA about opportunities in the next 12 months.<sup>56</sup>

- 2.57 CITA confirmed that it was keen to participate in the ASP, saying:

...we certainly want to jump on board the Aussie Specialist Program, so we will look at that one as well.<sup>57</sup>

## Immigration detention activities

- 2.58 For some years, the presence of immigration detention activities has had a significant impact on Christmas Island tourism. Former Administrator Mr Brian Lacy explained:

In the past five years tourism has suffered a significant setback as a result of the detention centre activities. From 2010 to 2012 flights to [Christmas] Island and accommodation were filled with personnel associated with, or engaged in the operations for the detention centre.<sup>58</sup>

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54 Mr Leigh Sorensen, General Manager Industry Relations, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, p. 7.

55 Mr Leigh Sorensen, General Manager Industry Relations, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, p. 7.

56 Mr Leigh Sorensen, General Manager Industry Relations, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, p. 10.

57 Ms Karenn Singer, Manager, Christmas Island Tourism Association, *Committee Hansard*, Canberra, 13 August 2015, p. 10.

58 Mr Brian Lacy, *Submission 39*, p. 20.

- 2.59 CITA claimed that media coverage of immigration operations damaged the reputation of the IOT as a holiday destination:
- ...we suffered from savage damage to our brand with riots, boat crashes and things like that.<sup>59</sup>
- 2.60 According to CITA, prior to immigration detention operations Christmas Island received approximately 2,000 visitors per year.<sup>60</sup> DIRD estimates current visitor numbers are now around 800 per year.<sup>61</sup>
- 2.61 Tourism Australia said that reputational damage is likely confined to the territories' primary visitor market; domestic tourism:
- Most people around the world would not know, I would imagine, where Christmas Island is. It is different for Australians...<sup>62</sup>
- 2.62 CITA observed that the recent decline in immigration activities<sup>63</sup> on Christmas Island had eased competition for flights and accommodation, however the problem of reputational damage persists:
- We are still recovering from that. We thank the [Australian] Government for continuing to fund us through that period, because I really see now that we would not even be getting the few people that we do if we had not continued to stay out in the market despite what we looked like on the news and in the media that was out there consistently.<sup>64</sup>
- 2.63 CITA and CKITA argued that reputational damage is best redressed through targeted marketing. They said they are working collaboratively to promote the region:
- Continued targeted marketing and promotion of nature and culture is the means available to CITA to rebuild the Christmas Island brand...

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59 Ms Lisa Preston, Chairperson, Christmas Island Tourism Association, *Committee Hansard*, Canberra, 13 August 2015, p. 8.

60 Ms Karenn Singer, Manager, Christmas Island Tourism Association, *Committee Hansard*, Christmas Island, 9 April 2015, p. 14.

61 Department of Infrastructure and Regional Development, *Submission 36*, p. 4.

62 Mr Leigh Sorensen, General Manager of Industry Relations, Tourism Australia, *Committee Hansard*, Canberra, 13 August 2015, p. 9.

63 Department of Immigration and Border Protection, *Submission 23*, p. 1.

64 Ms Lisa Preston, Chairperson, Christmas Island Tourism Association, *Committee Hansard*, Canberra, 13 August, p. 8.



To gain best value for money CITA and CKITA continue to work together to market the region under the banner of Australia's Indian Ocean Islands.<sup>65</sup>

- 2.64 The tourism associations suggested that additional funding would enhance the reach of marketing and promotion to rebuild the region's reputation:

Our marketing reach and capacity would be enhanced by:

- increased funding to enable more targeted advertising and social media campaigns, support agent and media familiarisation visits and participation in trade and consumer shows in Australia, Asia and the UK and trade shows including the Australian Tourism Exchange (ATE).<sup>66</sup>

- 2.65 DIRD said it already funds IOT tourism associations to undertake marketing campaigns, but acknowledged that 'better' promotion and 'national marketing campaigns' are needed to boost tourism:

The Department supports tourism development through funding local tourism associations, including funding for marketing campaigns...

The Department recognises that other avenues also need to be utilised to boost tourism, including by better promoting the IOT, ensuring that the IOT are included in national marketing campaigns and working with wholesale suppliers to develop complete experience packages.<sup>67</sup>

## Committee comment

- 2.66 The unique governance arrangements in the IOT means that the territories are largely excluded from mainland tourism support structures.

- 2.67 The Committee understands that the IOT will continue to be excluded from mainland tourism bodies, unless additional arrangements are made for them to access mainland support structures.

- 2.68 The Committee notes that past negotiations for the IOT to have an SDA with Tourism WA have not been successful. This does not preclude DIRD

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65 Christmas Island Tourism Association and the Cocos (Keeling) Islands Tourism Association, *Submission 45*, pp. 4-5.

66 Christmas Island Tourism Association and the Cocos (Keeling) Islands Tourism Association, *Submission 45*, p. 5.

67 Department of Infrastructure and Regional Development, *Submission 36*, p. 4.

from trying again to negotiate an SDA for tourism with the WA Government.

## Recommendation 2

**The Committee recommends that the Department of Infrastructure and Regional Development negotiate a Service Delivery Arrangement, in consultation with the Christmas Island and Cocos (Keeling) Islands Tourism Associations, to facilitate access to tourism support services provided by Tourism Western Australia.**

- 2.69 The Committee would like to see the ATDW board approve the inclusion of an external territories section in its new IT platform.
- 2.70 The inclusion of the IOT in key Tourism Australia initiatives will help bolster the region's exposure to international tourism. Featuring the IOT on the website, Australia.com will raise its profile amongst international holiday makers and increase its prominence online. Participation in the ATE and ASP will showcase the region's considerable natural attractions directly to travel retailers around the globe.
- 2.71 The Committee wants to see Tourism Australia continue to assist the IOT tourism associations where it can. The current informal arrangements that Tourism Australia has with the IOT tourism associations should be formalised. This might take the form of a memorandum of understanding that includes mentorship and secondment opportunities for staff to build capacity in the IOT tourism organisations, on request from those organisations. Tourism Australia officers could be placed in the IOT tourism organisations to offer a range of expertise and assistance, including economic development in tourism.

### Recommendation 3

**The Committee recommends that the relationship between Tourism Australia and the Indian Ocean Territories tourism associations be formalised. The formalised arrangement should include provision for Tourism Australia to build capacity, including promotion and marketing expertise, in the Christmas and Cocos (Keeling) Islands Tourism Associations. This could include secondment placements and mentoring opportunities.**

- 2.72 While it can be argued that immigration detention activities on Christmas Island boosted the local economy, to the extent that fly-in fly-out workers spent money on local services, the perception of Christmas Island as a domestic holiday destination suffered during that time. This impact has lingered, even though immigration detention activities have been winding down.
- 2.73 The Commonwealth has stated its support for a stronger economy in the territories and noted that tourism has an important role to play. The Committee considers it appropriate that the Commonwealth contributes additional resources to market and promote the region to redress reputational damage that immigration policy has played a part in.
- 2.74 The Australian Government should provide additional resources to CITA and CKITA to enhance marketing and promotion of the Christmas and Cocos (Keeling) Islands as a holiday destination for domestic travellers.

## Air access to the Indian Ocean Territories

- 2.75 CITA and CKITA emphasised that quality air services to the IOT are critical to tourism, as flying is the only mode of passenger travel to the territories.<sup>68</sup>
- 2.76 A twice-weekly service is currently provided by Virgin Airlines to and from mainland Australia. This is subsidised by the Commonwealth through a contractual arrangement. The service comprises:

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68 Christmas Island Tourism Association and the Cocos (Keeling) Islands Tourism Association, *Submission 45*, pp. 2-4.

- one triangulated A320 flight Perth-Christmas Island-Cocos (Keeling) Islands-Perth each week on a Tuesday; and
  - one triangulated A320 flight Perth-Cocos (Keeling) Islands-Christmas Island-Perth each week on a Saturday.<sup>69</sup>
- 2.77 DIRD's contract with Virgin Airlines is due to expire in July 2016 and a tender process is underway to identify a provider to continue air services from 1 August 2016.<sup>70</sup>
- 2.78 In discussing the future of air services in the territories, CITA and CKITA emphasised the need for services to be:
- reliable, including long lead times for route or schedule changes;
  - affordable, offering promotional and wholesale fares; and
  - convenient for travellers.

## Reliability – lead times for route or schedule changes

- 2.79 CKITA said two triangulated flights to the IOT are sufficient for tourism, as long as they are reliable:
- ...two flights a week is something that we can work with. Our greatest damage is coming from what appears to be ad hoc, uncoordinated flight changes...
- We need reliability.<sup>71</sup>
- 2.80 CITA observed that abrupt or last minute flight schedule changes impact the holiday plans of tourists and damage the region's standing with travel agents:
- ...with our work through the [Australian Tourism Exchange] we do actually have international travel agents and wholesalers dealing with us...you almost get the sense that Christmas and Cocos [Keeling] Islands...mess them around the most. It does not look good on us. It becomes too hard and there are hundreds of other places that they can send these guests to.<sup>72</sup>

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69 Department of Infrastructure and Regional Development, *Submission 36.2*, p. 4; Office of the Administrator Indian Ocean Territories, *Community Bulletin A14/2015*, 27 May 2015, p. 1.

70 Department of Infrastructure and Regional Development, *Community Bulletin D15/2015*, 15 May 2015.

71 Mr Dieter Gerhard, Chairperson, Cocos (Keeling) Islands Tourism Association, *Committee Hansard*, Canberra, 13 August 2015, p. 6.

72 Ms Lisa Preston, Chairperson, Christmas Island Tourism Association, *Committee Hansard*, Canberra, 13 August 2015, p. 5.

- 2.81 CITA and CKITA noted this also affected local operators:
- Small business incurred considerable financial costs and lost opportunities with the recent changes from 1 July 2015.<sup>73</sup>
- 2.82 CITA and CKITA stated that, in the future, schedule or route changes must be announced well in advance:
- If there are significant changes to routes and schedules a six month lead time is needed to minimise impact on forward bookings.<sup>74</sup>

### Affordability – wholesale and promotional fares

- 2.83 Throughout the inquiry, CITA and CKITA emphasised the importance of wholesale and promotional air fares. They argued that more affordable and flexible fares are needed to encourage tourism outside of peak periods.<sup>75</sup>
- The ability for the airline to manage fares through normal commercial arrangements to encourage tourism in the slower periods including outside of school holidays and peak activities/events (windsurfing season, crab migration season). This may include last minute seat sales and wholesale ticketing arrangements.<sup>76</sup>
- 2.84 In 2015, Mr Barry Haase, Administrator announced that Virgin Airlines was going to introduce wholesale airfares.<sup>77</sup>
- 2.85 CKITA said it was generally satisfied with the passenger service provided by Virgin Australia and hoped that negotiated arrangements would continue into the new air services contract when it commences 1 August 2016:
- ...it is vital that if a new airline carrier takes over or if the contract changes significantly that the progress that has already been made with air services to the islands is not lost.<sup>78</sup>

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73 Cocos (Keeling) Islands Tourism Association and the Christmas Island Tourism Association, *Submission 45*, p. 4.

74 Cocos (Keeling) Islands Tourism Association and the Christmas Island Tourism Association, *Submission 45*, pp. 3-4.

75 Christmas Island Tourism Association and the Cocos (Keeling) Islands Tourism Association, *Submission 45*, p. 3; Mrs Juliane Bush, Marketing Manager, Cocos (Keeling) Islands Tourism Association, *Committee Hansard*, Cocos (Keeling) Islands, 8 April 2015, p. 11.

76 Cocos (Keeling) Islands Tourism Association and the Christmas Island Tourism Association, *Submission 45*, p. 3.

77 Office of the Administrator Indian Ocean Territories, *Community Bulletin A14/2015*, 27 May 2015, p. 2.

## Convenience – flight access from the north

2.86 There are currently no regular scheduled flights from the IOT to international destinations to the north, although Christmas Island Air operates a charter flight from Jakarta to Christmas Island on an ad-hoc basis.<sup>79</sup> Witnesses to this and previous JSCNCET inquiries emphasised the importance of regular flights to the north and suggested that the current requirement to travel to the territories via Perth can be inconvenient for Asian and European tourists, as well as for locals with family ties in Asia.<sup>80</sup>

2.87 CKITA said the flight routing through Australia discourages international visitors:

...we get the inquiries, but when people find out that they have basically got to fly through Asia all the way over the top [of the IOT] down to Perth and then turn around to come back, it is very hard to convert those [into bookings].<sup>81</sup>

2.88 DIRD acknowledged that many IOT residents have close family and cultural ties with Asian neighbours, such as Singapore, Indonesia and Malaysia, and that some members of the community consider there should be more direct air connections.<sup>82</sup>

2.89 CKITA and CITA both claimed that regular flights to Asia would make it more convenient for international visitors to travel to the IOT and represented the greatest opportunity to grow tourism in the region.<sup>83</sup> CITA explained:

...we do think our main tourism growth is from the north. That is from Asia: the wealthy Asians who can pop across for short visits – they do not get very long. It is also from Europe, where we have a large following – we attend bird fairs in England – and potentially even from the United States for what we offer. So we

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78 Cocos (Keeling) Islands Tourism Association, *Submission 44*, p. 2.

79 Christmas Island Tourism Association, *Getting there - Flights*, <https://www.christmas.net.au/plan-your-trip/flights.html>, viewed 7 September 2015.

80 Joint Standing Committee on the National Capital and External Territories, *Report on the visit to the Indian Ocean Territories, 21-25 October 2012*, June 2013, p. 24; Mr James Clarke, Managing Director, Global Enterprise Group Pty Ltd, *Committee Hansard*, Canberra, 17 September 2015, p. 5.

81 Mr Dieter Gerhard, Chairperson, Cocos (Keeling) Islands Tourism Association, *Committee Hansard*, Canberra, 13 August 2015, p. 7.

82 Department of Infrastructure and Regional Development, *Submission 36*, p. 6.

83 Christmas Island Tourism Association and the Cocos (Keeling) Islands Tourism Association, *Submission 45*, p. 2.

do think there would be a lot of opportunity if there was a regular flight coming from the north.<sup>84</sup>

2.90 The Committee received evidence indicating that at least one commercial airline, Air Timor, is interested in establishing a service between Christmas Island and Indonesia.

2.91 However, according to Air Timor, flights to the north may not be economically viable without Australian Government assistance. Air Timor observed that it takes at least 12-18 months to develop the viability of a new air service. It said that a viable weekly flight from Indonesia to Christmas Island could only be established if landing and security fees were initially waived:

We believe we can successfully operate a once weekly flight to Christmas Island from Bali.

In the first year it will operate at a loss and we have submitted a letter to [DIRD] to forgo security and landing charges in the first year, to reduce that loss. It will take 12-18 months to make this weekly flight viable and we will incur greater losses than the costs forgone by the Commonwealth.<sup>85</sup>

2.92 Air Timor suggested that a weekly flight would not be enough, in itself, to develop tourism in the territories:

To develop tourism requires a minimum of two to three flights per week to enable tourism packages to be created and that then requires sufficient hotel accommodation. We cannot see any possible large scale hotel development or the existing hotel re-opening due to the high capital costs and the excessive operating costs on Christmas Island.

Therefore a 'catalyst' is required to make it attractive to build or reopen the existing hotel - that means a casino licence. Without such a licence being granted we see no opportunity to have more than a once a week flight from Asia.<sup>86</sup>

2.93 Casino Management International agreed:

A reopened casino would transform Christmas Island into a modern and vibrant tourist and holiday destination...<sup>87</sup>

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84 Ms Karenn Singer, Manager, Christmas Island Tourism Association, *Committee Hansard*, Christmas Island, 9 April 2015, p. 15.

85 Air Timor, *Submission 51*, p. 1.

86 Air Timor, *Submission 51*, p. 1.

87 Casino Management International, *Submission 15*, p. 1.

- 2.94 DIRD noted that it is not Australian Government policy to subsidise flights to the north of the IOT. While it waived landing fees between 2009 and 2012, the Department indicated that further work would be required to assess the benefits of another waiver, and:
- explore exemptions from cabotage arrangements, thus allowing international airlines to fly via the IOT; and
  - source funding to upgrade infrastructure, including through private/public partnership.<sup>88</sup>

### Committee comment

- 2.95 Reliable and affordable air access is essential for tourism to succeed in the IOT. A reasonable lead time for flight route or schedule changes is important to enable travellers and retailers to plan for the changes with the least amount of inconvenience. Wholesale and promotional fares can provide an incentive for tourists to visit during off-peak periods. Reduced fares are a sensible commercial decision, if more seats on the plane can be filled. The Committee would like to see this practice continue. Having promotional airfares will enhance the standing that air carriers have amongst tourism operators and residents alike.
- 2.96 The Australian Government subsidises flights between the IOT and Perth to ensure residents are not isolated from mainland Australia. It does not subsidise international flights.<sup>89</sup> However, the Committee notes that regular flights to Asia operated in conjunction with the Christmas Island casino in the 1990s. Private providers may determine that similar flights are economically viable, particularly if the Committee's recommendation to reopen the casino in its interim report tabled in June 2015 is taken up by Government.<sup>90</sup>
- 2.97 The Committee notes that the Administrator, Mr Barry Haase led a community meeting on July 2015 to discuss reopening the casino and that the majority of attendees recorded their support.<sup>91</sup> The Committee reiterates that it wants to see this matter progressed by the Australian Government.
- 2.98 The Committee notes Air Timor's request to be exempted from landing and security fees for a period to support the establishment of an
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88 Department of Infrastructure and Regional Development, *Submission 36*, p. 6.

89 Mr Julian Yates, *Submission 4*, p. 8.

90 Mr Michael Asims, Owner's Representative, Soft Star Pty Ltd, *Committee Hansard*, Christmas Island, 9 April 2015, p. 34; China Southern Airlines, *Submission 48*, p. 2.

91 Office of the Administrator Indian Ocean Territories, *Christmas Island Community Meeting: Potential Establishment of a Christmas Island Casino Licence Summary Notes*, 22 July 2015.



economically viable service from Indonesia to Christmas Island. It also notes that this is something that the Australian Government has done in the past for other airline operators.

#### **Recommendation 4**

**The Committee recommends that the Department of Infrastructure and Regional Development exempt airline operators that are interested in providing scheduled international flights to Christmas Island from landing and security fees for an initial operational period of 12 months.**

## **Insurance**

2.99 According to submitters, it is difficult and costly to insure business and property on Christmas and the Cocos (Keeling) Islands.<sup>92</sup> In this regard, the IOT is no different to the northern regions of mainland Australia. Insurance premiums have risen significantly in the last few years, particularly in northern Queensland, causing hardship for individuals and impacting the growth and development of affected areas.<sup>93</sup> The rapid increase is primarily attributed to cyclone risk:

Cyclones have always been part of life in northern Australia – Tropical Cyclone Tracy remains one of the most damaging natural disasters in Australian history. However, in recent years the insurance industry has reassessed the potential losses due to cyclones in northern Australia... The re-evaluation of potential losses due to cyclones saw a range of insurers reprice their premiums...<sup>94</sup>

2.100 The Indian Ocean is particularly vulnerable to cyclones:

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92 Councillor John Clunies-Ross, *Submission 6.2*, p. 5; Mr Raymond Marshall, *Submission 29*, p. 3; Mr Alan Whitley, *Submission 38*, p. 24; Mr Brian Lacy, *Submission 39*, pp. 21-22; Christmas Island Tourism Association, *Submission 26*, p. 10; Mr Keir Fraser, private capacity, *Committee Hansard*, Cocos (Keeling) Islands, 8 April 2015, p. 16.

93 Northern Australia Insurance Premiums Taskforce, *Interim Report*, 2015, p. 1.

94 Northern Australia Insurance Premiums Taskforce, *Interim Report*, 2015, pp. 9-10.

The Australian cyclone season officially runs from November to April. In the Indian Ocean, however, cyclones can occur all year around, although the risk in the winter months is very low.<sup>95</sup>

- 2.101 Mr Alan Whitely suggested that a lack of data on the occurrence of risks, such as cyclones, is contributing to IOT insurance difficulties:

...the islands find it difficult to secure insurance at anything that resembles premium rates. Whilst various reasons are given by brokers and insurance companies, we suggest that the real issue is that insurance underwriters do not have the historical information available to them to input into their risk models. We suspect that in some instances this will result in them simply declining to offer cover, and in other cases will see their models manually manipulated to provide the required input data. Due to their inherent conservativeness, these manual inputs will always lead to grossly inflated premiums.<sup>96</sup>

- 2.102 The Shire of Cocos (Keeling) Islands highlighted the lack of insurance in the IOT as a key barrier to economic development.<sup>97</sup>

- 2.103 Cocos (Keeling) Islands resident, Mr Ray Marshall observed that IOT residents find it difficult to sell property without insurance. He said:

It also stops anyone wanting to invest in infrastructure with lack of cover.<sup>98</sup>

- 2.104 Mr Colin Bloomfield, a small business owner on Cocos said:

...with the inability to get insurance, it is very difficult for people to raise finance.<sup>99</sup>

- 2.105 Former Administrator, Mr Brian Lacy said that the availability of insurance has been a long-standing issue in the territories:

The issue of insurance was an issue that I raised with [DIRD] on many occasions. ...the Department commissioned an inquiry into access to insurance for the IOT...but it was not published or provided to me before my departure...<sup>100</sup>

95 Northern Australia Insurance Premiums Taskforce, *Interim Report*, 2015, p. 57.

96 Mr Alan Whitely, *Submission 38*, p. 24.

97 Mr Aaron Bowman, Chief Executive Officer, Shire of Cocos (Keeling) Islands, *Committee Hansard*, Cocos (Keeling) Islands, 8 April 2015, p. 23.

98 Mr Ray Marshall, *Submission 29*, p. 3.

99 Mr Colin Bloomfield, private capacity, *Committee Hansard*, Cocos (Keeling) Islands, 8 April 2015, p. 27.

100 Mr Brian Lacy, *Submission 39*, pp. 21-22.

## Committee comment

- 2.106 The Committee acknowledges that an inability to access affordable insurance is a significant barrier to economic development. As noted, the reasons underlying this are not necessarily unique to the IOT.
- 2.107 A taskforce was established by the Hon Josh Frydenberg MP, former Assistant Treasurer, in March 2015 to explore options to assist regions of Northern Australia (including the IOT) to reduce insurance premiums in those areas 'experiencing insurance affordability concerns due to cyclone risk.'<sup>101</sup>
- 2.108 The Committee Chair wrote to the taskforce in May 2015 to specifically request that the IOT be included in this review. A final report, including recommendations on the best way forward, was provided to the Australian Government by November 2015.<sup>102</sup> The Committee awaits the Government's response to that report.

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101 The Hon Josh Frydenberg MP, Assistant Treasurer, Details of the Northern Australia Insurance Premiums Taskforce, *Media Release*, 8 May 2015, <http://jaf.ministers.treasury.gov.au/media-release/024-2015/>, viewed 8 September 2015.

102 Commonwealth Treasury, Northern Australian Insurance Premiums Taskforce, <http://www.treasury.gov.au/ConsultationsandReviews/Reviews/2015/NAIP-Taskforce>, viewed 9 December 2015.

