SA Productivity Commission Review of Red Tape survey – TiCSA response

Submitted via YourSAy. Friday 30 October 2026.

1) This survey response represents

An industry association or peak body

2) Main industry

Tourism (visitor economy – tour operators, accommodation, attractions, food and beverage, events)

3) What are the 1–3 BEST ASPECTS of South Australian state and local government regulation?

1. **Responsible Person approvals in liquor licensing.**

Approvals now come through quickly and can be transferred between venues. In a sector with high staff turnover, this keeps venues trading legally without long gaps. It shows that faster, portable approvals can work without weakening standards.

2. **Accreditation frameworks that support visitor safety and confidence.**

Operators support passenger transport accreditation in principle, because clear standards protect guests and the reputation of SA tourism. Where issues have been escalated to experienced departmental staff, they have generally been resolved quickly. Operators' concern is the administration around these frameworks, not the standards themselves.

3. **Faster government payment and a more responsive SA Government.**

Seven-day payment terms for small suppliers have made a real difference to cash flow for small tourism businesses. Operators also report that SA Government engagement has improved recently.

4) What are the 1–3 MOST PROBLEMATIC AREAS OF RED TAPE in South Australian state and local government regulation?

In order of impact, based on TiCSA's October 2026 member survey.

1. **Passenger transport accreditation renewals (Department for Infrastructure and Transport and Service SA).**

The problem: This was the most consistent issue raised by tour operators. Renewals require operators to resubmit police checks, Working with Children Checks, vehicle checks and business registration documents, even when nothing has changed and these matters are already monitored continuously. Processes still rely on hard-copy forms and in-person payments. One regional operator's nearest service centre is 55 km away, so a simple transaction costs most of a working day plus fuel. DIT and Service SA systems are not aligned, so operators are referred back and forth, and one renewal took more than four forms. Accreditation and WWCC renewal cycles also don't line up, because a new WWCC can't be issued until the existing one is within six months of expiry. Small owner-operators lose time they would otherwise spend hosting guests and growing the business.

The fix:

- A single online system for applications, renewals, document uploads, payment and progress tracking, retaining information government already holds and sending automatic reminders. The Northern Territory consolidated park tour permit processes into one online portal with tracking in 2022.
- "Change-only" renewals, with no repeat checks where continuous monitoring already applies.
- Aligned accreditation and WWCC renewal cycles.
- A review of whether WWCC requirements are proportionate for age-restricted services such as wine tours.
- Recognised industry accreditation, such as Quality Tourism Accreditation, accepted as evidence for elements of operator accreditation, consistent with the Commission's own suggestion of trusted third-party certification. Western Australia already treats operators with higher accreditation as meeting its parks agency's performance requirements, without separate audits.

This delivers on the reform TiCSA called for in its 2026 State Election Tourism Policy Priorities: more efficient, user-friendly processes for tour operator licensing and vehicle accreditation.

2. Planning, building, fire safety and council approvals, where agencies overlap and each approval depends on another (councils, building fire safety committees, State Planning Commission, DIT).

Overlap between council and state rules

Operators report that council and state requirements overlap on the same activity. They must satisfy both, and the two sets of requirements sometimes conflict. Each matter should be regulated by either council or state, not both.

Circular approvals for heritage buildings

One operator is 4.5 years and tens of thousands of dollars into consultant fees trying to bring a near-100-year-old building into tourism use, and the building has sat largely empty. Fire safety requires additional exits. Council won't approve the building works for those exits without an updated car park plan, which needs a $10,000+ traffic engineering report. Each approval depends on another being granted first, and every new hurdle triggers another consultant report. The fire safety committee meets irregularly, its membership changes, and meetings are often deferred. The operator had to raise the Ombudsman before getting any response from council.

The fix is a case manager or single point of coordination for tourism and heritage adaptive reuse, as Western Australia's Tourism Investment Delivery Division provides for priority tourism projects. Fire safety committee decisions should have binding timeframes. Agencies should be required to resolve conflicting or interdependent conditions between themselves rather than through the applicant.

Glamping and safari-tent accommodation

SA has no specific pathway for this accommodation. Tents are assessed as Class 1b buildings, and the bushfire Performance Solution has to be prepared again for every site, even when the product is identical. This repeats consultant costs and leads clients to drop the product.

Since December 2022, New South Wales has allowed farm stay accommodation (including camping and glamping), farm gate premises and farm experiences to proceed as exempt or complying development where they meet set standards. SA should adopt an equivalent pathway, and accept a product-level Performance Solution alongside a site-specific Bushfire Management Plan.

Regional agritourism

DIT road and access requirements for farm entry are applied as if the site carried urban traffic volumes, when it may receive around ten cars a day. Small regional tourism businesses need proportionate, low-volume access standards, which the NSW agritourism pathway also sets out.

3. Permits and licences for access to parks, reserves, marine areas and public spaces (DEW, PIRSA, Botanic Gardens, councils).

The problem: Members raised permits for parks, reserves and public spaces as a significant burden.

- Tour operators need permits and must notify the venue each time they bring a group through the Adelaide Botanic Garden, even for a brief part of a longer experience. That prevents spontaneous itinerary changes and means operators turn away requests for private tours.
- Coaches have very few legal set-down points near major landmarks and Rundle Mall.
- Minor works, such as clearing an overgrown council verge outside a business, trigger paid traffic management requirements.
- Operators in national parks and marine parks need a CTO licence, which can run up to five years. They also need a separate marine parks sanctuary zone permit, which lasts no more than 12 months, plus vehicle permits and special approvals, each with its own application and renewal cycle. Multi-year CTO terms depend on specified accreditations, but the list doesn't clearly recognise Quality Tourism Accreditation.
- Wild-caught seafood and fishing experiences face a closed charter boat licence pool, with no new licences until 2032. They also face complex reporting and catch rules, and no single pathway for new seafood tourism products. The 2021 aquaculture tourism reforms created a one-stop PIRSA application, but only for infrastructure in aquaculture zones.

The fix:

- Annual permits with no per-visit notification for incidental use of public spaces.
- Designated coach set-down zones near key attractions.
- Proportionate requirements for minor works.
- One DEW permission covering parks and marine parks, with aligned multi-year terms. Queensland has legislated a single integrated tourism permission covering national parks, state forests, recreation areas and state marine parks, replacing separate permits, fees and expiry dates while keeping existing environmental safeguards.
- Explicit recognition of Quality Tourism Accreditation for multi-year terms.
- A PIRSA pathway for new seafood tourism experiences, extending the aquaculture tourism one-stop model.

5) Would you like to provide any other comments related to this inquiry?

These issues come from a TiCSA member survey run in October 2026. The areas members cited most often were paperwork and reporting to government, passenger transport accreditation, and planning and development approvals, followed by permits for parks and reserves and food safety. The findings are consistent with feedback gathered through TiCSA's industry forums since mid-2025, which informed our 2026 election priorities.

Unfinished business from the 2021 Tourism Regulation Review

Many operators are sceptical about this inquiry because they see little evidence that the Commission's 2021 Tourism Regulation Review was acted on. That review recommended:

- published approval timeframes and public performance reporting for tourism regulators (Recommendation 8.1);
- DEW and PIRSA coordinating consolidated guidance for nature-based and agritourism businesses (8.4);
- prioritising digital services in tourism-related agencies (8.6); and
- a central SA Health process for feedback on councils' food safety enforcement (5.1).

It also noted ongoing PIRSA discussions about more flexibility for charter fishing. The issues members raise today are the same: slow and uncoordinated approvals, paper-based accreditation, inconsistent local enforcement, and barriers to charter and seafood experiences. Some progress has been made, including online CTO applications and PIRSA's oyster tourism reforms. However, the 2021 review concluded that most issues could be resolved through agency culture without legislative change, and five years on that has not been enough. We ask that this inquiry recommend binding mechanisms: mandated lead agencies, timeframes for decisions and public performance reporting. We also ask that the Government report publicly on implementation of the 2021 recommendations.

South Australia is falling behind other states

The terms of reference ask where SA is more burdensome than similar jurisdictions. Other states have already put in place mechanisms SA lacks:

- **Lead agencies and case management.** Queensland's Tourism Support Hub (December 2025) assigns a dedicated officer to each enquiry, coordinates across departments and responds within one business day. Western Australia established a Tourism Investment Committee of Cabinet in 2024, supported by a division that case-manages priority tourism projects through approvals. Tasmania's Office of the Coordinator-General manages tourism proposals for national parks, reserves and Crown land; of 73 submitted, nine are operating with $31.6 million invested so far.
- **Single permissions and digital applications.** Queensland's single integrated tourism permission across land and marine tenures, and the Northern Territory's single online portal for park tour permits.
- **Accreditation in place of duplicated checks.** Western Australia accepts higher environmental accreditation in place of separate parks audits, and Victoria requires schools to use accredited residential campsites.
- **Planning pathways.** New South Wales' exempt and complying development pathways for agritourism and farm stay accommodation, including glamping.

Reforms in the Issues Paper that members support

- **A single lead regulator.** SA should establish a Tourism Support Hub or equivalent lead agency, with priority for new and unique tourism products and adaptive reuse of heritage buildings.
- **Trusted third-party certification.** Recognising Quality Tourism Accreditation would reduce duplicated checks across DEW licensing, passenger transport accreditation and school camps. The Government's free Year 7 camps commitment is a timely opportunity: SA could recognise campsite accreditation, including the Quality Tourism Framework's Camps and Adventure accreditation used in Victoria, so schools rely on it rather than each school assessing venues separately. That would cut paperwork for educators and give operators one clear standard to meet. TiCSA delivers the Quality Tourism Framework in SA, so it notes an interest here.
- **Report once through a central portal.** Paperwork and reporting was the most-cited area. Members described utility and government portals that don't keep account or payment details,

government invoicing and purchase order processes that reject invoices on technicalities, the repeated cost of food safety supervisor training in high-turnover small businesses, and food regulation advice that small producers find inconsistent. Government should not ask businesses for information it already holds.

- **Clear allocation of road and public space control between councils and the state.** This would resolve the coach set-down and minor works problems described above.

Compliance costs fall disproportionately on small, often owner-operated and regional businesses. Many of them are the experiences that differentiate South Australia for visitors. Our proposals keep the safety and environmental outcomes these regulations are designed to deliver, and change how they are administered.

We note that national park, Botanic Garden and other commercial fees are cost-recovery matters outside this inquiry's scope. Our concern is the administrative process attached to them.

TiCSA would welcome a meeting with the Commission as part of its industry consultations. We can also provide detailed case studies confidentially, and will make a further written submission and a submission on the Interim Report shortlist.

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