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Discussion document on proposals for a biodiversity strategy for Aotearoa

1. The Game Animal Council

The Game Animal Council (GAC), established under the Game Animal Council Act 2013, is a statutory organisation with responsibilities for, *inter alia*, representing game animal hunters, and advising on and managing aspects of game animal hunting. Game animals are feral pigs, chamois, tahr, and all species of deer.

Introduction

2. Game animals as a resource for New Zealand

New Zealand's game animals are an important recreational, social and economic resource. The general public of New Zealand values game animals. Over 150,000 people harvest small game, large game or gamebirds at some time during each year.

All game species in New Zealand are harvested for food, and while deer farming accounts for the vast majority of game meat exports, shot wild game is significant in both export statistics and domestic consumption.

The combination of recreational hunting and aerial recovery expertise developed over the past 50 years allows privately funded control and management of New Zealand's big game populations at no cost to the government.

3. Game species as an economic resource

The deer industry has total export earnings of \$322 million (year ended 2018). New Zealand venison and velvet returns have been at record prices, assisted considerably by the perception internationally of venison as a safe food item. Consumers have traditionally perceived venison to be a hunted product and often do not differentiate between farmed and hunted sources at the point of purchase or consumption. New Zealand, as country of origin, enjoys an unparalleled reputation for its farming, environmental and animal husbandry practices.

The guided hunting industry has earnings of approximately \$35 to \$40 million annually and has considerable potential for expansion. Internationally, New Zealand is considered to be the world's premier destination for hunted red deer stags and Himalayan tahr and is increasingly recognised for the quality of its other game species. It is considered a safe, stable, unpolluted country, and attracts a discerning, influential hunting clientele.

The total gross sales effect New Zealanders on recreational hunting has recently been calculated to be in the order of \$350 million annually. Large game species are a major focus of that hunter spend. Less easy to quantify, but probably of greater significance, is the role hunting plays in the national health statistics as a form of recreation enjoyed by tens of thousands.

4. The Hunting Sector and Conservation

The Game Animal Sector provides many benefits to conservation in New Zealand. This includes predator trapping as provided by the Fiordland Wapiti Foundation and Central North Island Sika Foundation plus back country hut building and maintenance as provided by the Rakiura Hunters Huts Trust, New Zealand Deerstalkers' Association and Safari Club International.

5. Submission

5.1 Key Principle

The Game Animal Council strongly supports that a key principle for the development of a new biodiversity strategy is that it must be for **all** New Zealanders.

The broader public must take ownership of the strategy and of conservation itself. It needs to become part of the fabric of life in New Zealand. The strategy needs to appeal to middle

New Zealand for it to be durable and achieve its objectives. Taking ownership starts with educating our young people as it is not this generation that will get there but the next two generations and beyond. People need to get invested in it and the best way to do this is to get them out there doing something no matter how small. The strategy needs to be empowering but more importantly enabling. This must be a major focus and one of the first steps under the system shifts. In order to take ownership of the strategy the public must be able understand what it is about, what it wants to achieve, why and how. The strategy needs to be short and written in plain language. It also must to appeal to the broad political spectrum to ensure there are no wild swings in direction when governments change. It must cater for our multiple values for nature both indigenous and valued introduced species in order to facilitate the cooperation of all sectors.

5.2 Visions

The overall vision out to 2020 is too ambitious. 50 years is nearly two generations and we have to allow for intergenerational equity, not cutting off options for future generations to make their own decisions. Technology and knowledge in general are moving at an exponential pace so planning for such a long time scale is not advisable.

5.3 Goals

They need to be measurable and achievable within a time span we currently have influence over. Some of the goals such as no further decline in the number and extent of coastal and freshwater wetlands may be beyond our control and there will be further decline before or if we can undertake some restoration. Some loss will happen in spite of what we want as it is a natural process with wetlands. Avoid absolute goals such as zero bycatch as it is too easy to fail. Such a goal is better worded as being as close to zero as practically achievable. Zero based goals do not take into account the sustainability of a population. A bycatch of one individual per year may not affect the viability of a population.

5.4 Strategy Review

Technology and knowledge are now moving at an exponential pace and we need more regular review of progress on the strategy. The direction and currency of the strategy should be reviewed every ten years and the strategy itself totally reviewed every 20 years

5.5 Legislation, Policy and the Strategy

With the more inclusive, collaborative and inclusive direction the strategy is taking will create tension between outdated legislation and policy and the direction of the strategy. This should not be allowed to be a roadblock nor handcuff the achievement of the strategy. For example, the Wild Animal Control Act and the Deer Policy Statement are out of date and not fit for purpose. Such barriers need be flagged and recommendations for change made as part of the strategy.

5.6 Governance and Coordination

Governance group needs to be representative of the public and not captured by sector interests. The group needs to have monitoring and coordination roles via biodiversity hubs which the GAC sees as being the enablers of the strategy. Facilitating people engaging with conservation and making it happen in practice.

5.7 Adaptive Management Principles

The GAC strongly supports the use of adaptive management principles in the strategy. The words “action assess action” is the type of language we should be using. Clear concise and understandable.

5.8 Implementation; the 5 system shifts

The GAC supports the 5 systems shifts and would see that top priority for implementation and action is the conservation of our most critically endangered species. Following that should be Shift 3 with the addition of the word **enabled** after empowered. The GAC sees this as a cornerstone of achieving the provisions of the strategy.

5.8 Valued Introduced Species

The Game Animal Council strongly supports the strategy including game animals and should designate them as valued introduced species. They are not generically pests as this has a legal definition under the biosecurity Act. They are legally Wild Animals under the Wild Animal Control Act or Game Animals under the Game Animal Council Act. Collectively with

other species such as trout, salmon, ducks, pheasants, quail etc they are collectively valued introduced species.

Their Inclusion is crucial to the document leading the future of conservation in New Zealand in a forward looking and enlightened manner as opposed to the previous more divisive approach. The Game Animal Council strongly supports statements in the discussion document that include (our words added in **yellow**):

- Acceptance that these animals are now part of New Zealand and are valued.
- Nature is intrinsically valuable and humans have a responsibility to safeguard and protect it.
- Non-indigenous biodiversity is neither 'all good' nor 'all bad'.
- New Zealand's ecosystems cannot return to how they were 800 years ago.
- Achieving a balance that recognises non-indigenous animals which are valued
- Developing approaches which provide for the multiple values people have for different species, both indigenous and non-indigenous
- The new strategy should prioritise the special responsibility we have for indigenous biodiversity **but this priority should not be all encompassing, it should be assessed at place**
- Access to the natural world is vital for our mental and social wellbeing and positively affect our health and spending time in the outdoors helps relaxation and the forging of social bonds
- New Zealand's biodiversity is a melting pot – some species have evolved here in isolation for many millions of years, whereas others are much more recent arrivals. Many species have been introduced to New Zealand over the last 800 years – whether through natural, intentional or unintentional means. These non-indigenous species have become the basis of our economy through agriculture and forestry; others are valued for their contributions to social and cultural wellbeing, such as recreation and amenity. **These species will generate the revenue that will ultimately fund the strategies success and this needs to be acknowledged.** Non indigenous species can sometimes play a positive role in creating ecosystems that support indigenous species – for example, kiwi and kārearea (falcon) are thriving in some radiata pine habitats. **There is research suggesting that once a species has been in New Zealand for 200 years or more people consider it should be termed as indigenous. During the projected life of the strategy this would include Red deer and wild pigs with the other deer species plus tahr and chamois being not far behind.**

- Other non-indigenous species are **unwanted and not valued**. They threaten indigenous species and ecosystems, through predation, browsing, disease and competition, and can cause a nuisance to people.

Taking account of the above we recommend that Page 31 section 2.4 Long-term outcomes Wananga-systems and behaviour be amended as follows:

Valued introduced species and ecosystems are managed for the cultural, economic and recreational values that these species provide whilst maintaining or enhancing indigenous biodiversity.

As a society we have diverse values regarding nature, and people value both indigenous and non-indigenous biodiversity for the social, cultural environmental and economic benefits they provide.

This outcome recognises the special responsibility we have towards indigenous species - because they are special to New Zealand and found nowhere else - and the importance of considering this when making decisions on non-indigenous biodiversity and its benefits to people's wellbeing.

It also recognises that non-indigenous species can benefit indigenous biodiversity, for example by providing habitat, and that indigenous and non-indigenous biodiversity can be integrated into the places where we live, work and play.

Aotearoa New Zealand's economic activity provides for the restoration and protection of indigenous biodiversity

The environment sets the parameters of our economy. This outcome recognises that there is an opportunity to embrace economic activity in a collaborative way that helps drive indigenous biodiversity restoration. This will benefit nature, our wellbeing and the economy.

Aotearoa New Zealand is making a meaningful contribution to global biodiversity management

As Aotearoa New Zealand is a global biodiversity hot spot, protecting and restoring our indigenous biodiversity makes a meaningful contribution to global biodiversity.

Aotearoa New Zealand can play a leading role in improving biodiversity globally by sharing our expertise, innovation and knowledge, contributing to international agreements, and delivering improved outcomes for species that migrate between New Zealand and elsewhere in the world or are resident in New Zealand but under threat in other countries.

5.9 A National Policy statement on non-indigenous biodiversity.

If we are truly to embrace both indigenous and non-indigenous biodiversity then there should equally be such a national policy statement. In fact, just one all-inclusive policy statement would be a major step in the right direction.

5.10 Role of the GAC going forward

The GAC has a history of working constructively and cooperatively with many agencies and will continue this approach. The Council offers its assistance and expertise to those who will draft the strategy.

6. Summary

Many New Zealanders are unwilling to accept that their support for the conservation of native species and ecosystems must necessarily come at the cost of denying any place in New Zealand's wild lands for valued introduced species such as deer, tahr, chamois and wild pigs. A Biodiversity Strategy that is enlightened, takes action to conserve our most critically endangered species, embraces both indigenous and valued introduced species, engenders a sense of public ownership and enables all New Zealanders to directly participate in conservation will have a much higher likelihood of success.

The Game Animal Council would welcome the opportunity to speak to this submission. If you have any queries relating to this submission, please contact me on 0274885940.



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Chair
NZ Game Animal Council