

18 March 2022

Stewardship Land Consultation
Department of Conservation
PO Box 10420
Wellington 6143



stewardshiplandpolicy@doc.govt.nz

New Zealand Game Animal Council submission on Stewardship Land in Aotearoa New Zealand – Options to streamline processes for reclassification and disposal

About the New Zealand Game Animal Council

The New Zealand Game Animal Council (GAC), established under the Game Animal Council Act 2013, is a statutory agency with responsibilities for, *inter alia*, advising and making recommendations (in relation to game animals) to the Minister of Conservation, raising awareness of the views of the hunting sector, and advising on and managing aspects of game animals and hunting.

Game animals are defined under the Game Animal Council Act 2013 as wild pigs, chamois, tahr, and all species of deer.

General comments

1. The GAC broadly supports the Department of Conservation's intention to streamline the process for the reclassification and disposal of stewardship land.
2. The GAC has been concerned that the treatment of stewardship land has become heavily politicised over recent years, something which has no-doubt had an impact on its reclassification and management. We are also concerned at the impact that managing such a large amount of land has on the resources of the Department and the flow-on effect that has to the management of conservation and recreation land across New Zealand's public estate generally.
3. As a statutory body with responsibilities for game animals and hunting, the GAC has a strong interest in preserving, and where necessary, enhancing public and recreational access on the public conservation estate and specifically with regards to the hunting opportunities that exist on it. We consider this is not only critical to support hunting as an active recreation pursuit but also to assist the hunting sector contribute to game animal management and conservation activities.

4. In various locations around the country where hunter access is prohibited or severely restricted game animal numbers have increased resulting in a range of negative impacts, including overpopulation and over-browsing.

Method

5. The GAC has not responded to each question individually, instead, we have provided broad recommendations on each section. We have focused on issues that sit within our statutory mandate, that affect the hunting sector and impact the management of game animals.
-

Questions 1-2: Introduction

6. The Department of Conservation has a legislated mandate to foster recreation, so in order to ensure recreation is considered as part of the review we suggest amending the following objective:
 - Ensuring conservation *and recreation* values are adequately protected

Questions 3-5: Current legislative framework

7. We largely agree with the description of the problem and particularly where it has been identified that some places are subject to competing interests. The role of competing interests will not and should not be completely removed by streamlining the reclassification process. However, it is of concern to the GAC that reclassification decisions can be affected by emotionally charged public debates, as this can lead to poor outcomes for both conservation and recreation.
8. An example of this is where a parcel of land is reclassified above its true conservation value demanding restrictions on access and activities that reduce recreational participation, including hunting. This can lead to detrimental conservation outcomes where, without hunting pressure, game animal and wild goat numbers increase and adversely impact the native ecosystem.

Questions 6-9: Section 1

9. The GAC is concerned with the proposal to shorten the public submission period to 20 days and the impact that may have on the hunting sector's ability to engage in the process. At various time of the year (particularly the Roar/Rut periods) both recreational and commercial hunters will spend large periods of time away from home/the office. Having only 20 working days (or one calendar month) to participate in a short public submission process may make it difficult for some.
10. The GAC also believes that public hearings are an important part of the consultative process and would be hesitant to recommend that a panel could decline a hearing.

We propose a middle-ground approach where a panel can limit the scope of hearings to particular issues identified by written submissions.

11. As a principle, the GAC would like to see administrative and bureaucratic delays in the reclassification process streamlined before public involvement is reduced.

Questions 10-12: Section 2

12. The GAC agrees with the proposal to enable the national panels to carry out the public notification and submission process.

Questions 13-15: Section 3

13. The GAC sees merit in the proposal for national panels to assume primary responsibility for reclassifying stewardship land as national parks. We are encouraged by the fact that the panels are to include expertise in recreation and heritage alongside ecology, earth sciences, landscape and mātauranga Māori. It is important that this range of expertise is adequately reflected in the membership of each panel.
14. The GAC recommends that at least one person who is nominated to the national panels has expertise in recreation and knowledge of game animals and the wider hunting sector.

Questions 16-18: Section 4

15. Declaring all stewardship land under section 62 of the Conservation Act 1987 to be held for conservation purposes (option 4.1) would streamline the reclassification process, however we do have concerns that this could lead to a lack of due process. The GAC would therefore support the declaration being amended to include the requirement for public consultation.

Questions 19-21: Section 5

16. The GAC is well-aware of the limits on the Department's resources and believes it is necessary for DOC to retain a mechanism to at least recoup process and administrative costs from the sale of land.
17. However, while we believe it would be a poor outcome if the status quo was retained (option 5.2) and this resulted in delays to the necessary disposal of parcels of stewardship land with little conservation and recreation value, a strong argument can be made that if proceeds go directly to DOC this provides a perverse incentive to dispose of land better suited to remain as part of the public conservation estate.
18. A middle-way that avoids this perceived conflict of interest is for the proceeds to be allocated by an independent body (as the Minister of Finance does now) or directly allocated to a fund that provides the necessary cost recovery to DOC, while providing funding for community conservation and recreation projects.

Questions 22-25: Section 6

19. The GAC supports option 6.2 as this provides greater certainty for existing concession holders during the reclassification process and means concession holders can continue to plan for the future.
20. The GAC is not aware of the exact number of commercial hunting operators who operate on stewardship land, but in looking at the areas concerned, it is likely to be significant. As a commercial hunting operator's concession is a major part of their livelihood it is important that they are treated as fairly as possible in any new reclassification process, something that option 6.1 does not ensure.

Question 26-27: Sections 7 and 8

21. The GAC has no further suggestions with regards to non-regulatory options or the implementation of evaluation and monitoring measures.

If you have any queries relating to this submission, please contact me on 021 688 531 or at tim.gale@nzgac.org.nz.

Yours sincerely



Tim Gale
General Manager
New Zealand Game Animal Council