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Draft National Policy Statement for Indigenous Biodiversity
Exposure Draft Consultation
Ministry for the Environment



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Game Animal Council Submission on the Ministry for the Environment's Draft National Policy Statement for Indigenous Biodiversity

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. Game animals are also recognised as valued introduced species in Te Mana o te Taiao – the Aotearoa New Zealand Biodiversity Strategy 2020.

New Zealand Hunting Sector

Hunters play a key role in the management of wild animals and conservation, and it is estimated that recreational hunters alone are responsible for harvesting approximately half a million game animals and pest goats each year.¹

This management is important to maintain the health of game animal herds and the environment they live in.

Outdoor recreation is an important part of New Zealand life and culture. Access to public conservation lands is crucial to ensure that New Zealanders can easily reach the wild areas they value for their recreational pursuits. The value of recreation is recognised in legislation, including the National Parks Act 1980 and the Conservation Act 1987. Both these Acts require the fostering of recreational activities, such as hunting, on public conservation land.

¹ GN Kerr & W Abell (2014) Big game hunting in New Zealand: per capita effort, harvest and expenditure in 2011–2012, *New Zealand Journal of Zoology*, 41:2, 124-138, DOI: 10.1080/03014223.2013.870586

National Policy Statement for Indigenous Biodiversity

1. The GAC welcomes the opportunity to submit on the draft Ministry for the Environment's proposed National Policy Statement for Indigenous Biodiversity. The GAC is a statutory stakeholder on New Zealand's biodiversity and its advisors include scientists well qualified in this field. The GAC's governing board also includes Māori representatives who provide te Ao Māori expertise and advice.
2. This submission has focused on key themes which reflect the GAC's statutory mandate, potential impact on the hunting sector and the effective management of game animals.
3. In considering the Ministry for the Environment's draft NPS on Indigenous Biodiversity, the GAC notes that *Te Mana o te Taiao Aotearoa New Zealand Biodiversity Strategy 2020* recognises game animals as valued introduced species and states –

Reaching a balance to ensure that valued introduced species continue to provide the benefits they are valued for, while also ensuring that indigenous biodiversity thrives, is a key challenge for Aotearoa New Zealand.
4. The GAC supports including Mātauranga Māori in the NPS and believes that blending it with the understandings provided by ecological science is critical. Using both Mātauranga Māori and ecological science knowledge bases will add value and allow a proper appraisal of forest ecology and introduced species.
5. The GAC supports the proposed management hierarchy. It is sound, and consistent with international literature.
6. The GAC supports the inclusion of the concept of 'ecosystem services'. In the past, only 'natural ecosystem services' have been acknowledged when in the GAC's view, food gathering, hunting, recreation and other outdoor pursuits are all ecosystem services and need to be properly acknowledged.
7. The GAC supports some of the draft NPS's objectives and policies. In particular, Policy 9 allows provision for certain activities, while policy 10 recognises and provides for 'activities that contribute to New Zealand's social, economic, cultural, and environmental well-being'. The GAC believes this properly covers hunting's social and cultural dimensions.

Te Rito o te Harakeke

8. The definition of Te Rito o te Harakeke is potentially problematic. While it refers to 'intrinsic value', this is not defined. This needs to be done because there are varying definitions which could be applied. As it stands, the 'intrinsic value' definition does

not seem to be consistent with how it is defined elsewhere in New Zealand legislation and if it remains unclarified and inconsistent, then it raises problems for future decision-making.

9. As it presently stands, Te Rito o te Harakeke does not include mainstream science. As the GAC notes earlier in Point 4, using both Matauranga Māori and ecological science knowledge bases will add value and allow a proper appraisal of forest ecology and introduced species. The GAC suggests changing Te Rito o te Harakeke to address this.
10. The GAC believes the document has been loose in its use of the term tangata whenua when referring to iwi in a specific rohe or locality. Such references need to be more specific as tangata whenua in one rohe may have a different view to tangata whenua in another rohe and it shouldn't be assumed they have a common or shared view.
11. On page 3 of the NPSIB exposure draft summary for iwi/Māori, we would suggest a modification to the sentence "Councils are required to work with tangata whenua to develop a local approach for Te Rito o te Harakeke." The GAC suggests amending it to read; "Councils are required to work with tangata whenua in their rohe to develop a local approach for Te Rito o te Harakeke"
12. Again, in the discussion on Geothermal Significant Natural Areas, the sentence "Councils must work with tangata whenua to develop plans to protect geothermal SNAs." Could be amended to read; "Councils must work with tangata whenua in their rohe to develop plans to protect geothermal SNAs."
13. To avoid such confusion, the GAC also believes it would be helpful to include a statement earlier in the draft NPS clarifying that the use of tangata whenua means tangata whenua within specific rohe.
14. The GAC suggests that to make the process more transparent and reassure submitters, then the consultation document should acknowledge that an expert Māori advisory group with indigenous biodiversity and Te Ao Māori expertise has provided input on the Te Ao Māori and Māori land provisions of the NPS on Indigenous Biodiversity.

Will the way the National Policy Statement for Indigenous Biodiversity has been drafted work on the ground?

15. The GAC is of the opinion that the complexity of some proposals makes the possibility of the NPS working in the real world unlikely.
16. As it stands in its present draft, the NPS places an enormous workload on Local Government - a work load the GAC believes these authorities are unlikely be able to deliver without further rates increases and significant numbers of new ecology staff.

17. The GAC believes the NPS needs to be widened from its present focus on 'development'. Whether there are 'development' proposals over these landscapes or not, our biodiversity will continue to decline without significant expenditure on weed and pest control.
 18. The definition of 'habitat' conflicts with the definition of 'natural range'. According to this definition, locations where native species have been introduced for their own protection, such as Auckland's Tiritiri Matangi Island, would not be habitat.
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Opportunity costs

19. The GAC believes the draft document is weak on 'opportunity costs'. It appears to assume that 'improvements to native biodiversity' are a costless exercise. Hunters are actively involved in game animal management, wild animal control and predator and pest management throughout the country that enhances native biodiversity. The predator-free programme has provided many lessons, foremost being that predator control is anything but costless.
 20. Another example of failing to address "opportunity costs" is Section 3.5 1(a), which the GAC views as one-sided. This section requires local authorities to consider that [restoration] contributes to the well-being of people. However, it does not recognise that restoration can also adversely affect those same people's well-being. Ridding local areas of game animals will hurt local communities. In areas where many families rely on subsistence living, they will be hard hit by removing local wild pig or deer populations for example. In the South Island, removing bull tahr would adversely affect a range of hunting and tourism providers involved in guided hunting, accommodation, outfitting and tourism.
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Significant Natural Areas

21. The GAC supports the provisions in 3.15 (2) as potentially an important lever for maintenance of game populations.
22. The GAC views Significant Natural Areas as an area of potentially major problems with 'real world' implementation. While the philosophy is laudable, the execution will be difficult. For example, the criteria for identifying SNAs in Appendix 1 could prove problematic. The phrase, "an area qualifies as an SNA if [has] indigenous vegetation that has ecological integrity that is typical of the character of the ecological district" is too all encompassing, while "an area that qualifies [has] at least a moderate diversity of indigenous species, vegetation, habitats of indigenous fauna or communities in the context of the ecological district" sets a very low bar.
23. The GAC believes that the expectations on landowners to manage weeds and pests in SNAs on their property is onerous and fears it could be counterproductive.

24. The GAC suggests that greater thought be given to introducing more 'carrot than stick' when creating SNAs so they can be viewed as beneficial rather than punitive.
25. As it presently stands, the draft NPS provides no indication of how far local councils need to go in pursuing native biodiversity enhancement. The GAC believes this has important implications for the status of game animals and their management and the GAC's statutory role. The GAC asks that this be clarified.
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Regional Biodiversity Strategies

26. The GAC supports Clause 3(a) which recognises other objectives, including 'amenity' and interprets it as welcome support for the continued existence of game animals and hunting in line with *Te Mana o te Taiao Aotearoa New Zealand Biodiversity Strategy 2020* and its recognition of game animals as valued introduced species.
27. However, the GAC views 4(a-e) which identifies things that must be taken into account when developing a regional biodiversity strategy as one-sided. It does not consider any form of costs, whether financial, social, cultural, and recreational. It needs to be developed further to properly acknowledge these factors.
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Conclusion

28. The GAC and the hunting community support environmental protection and enhancement. The GAC suggests the NPS needs to take into account that resources for protection and enhancement are limited and that there must be some mechanism to allow the picking of winners. Without such acknowledgement, local government will be placed in an invidious situation where it cannot deliver on the high expectations the NPS expects.

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



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