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Stewardship Land Reclassification Project  
C/- Department of Conservation,  
Private Bag 4715, Christchurch Mail Centre  
Christchurch 8140



Attention: Anna Cameron

[stewardshiplandreclassification@doc.govt.nz](mailto:stewardshiplandreclassification@doc.govt.nz)

## West Coast Stewardship Land Reclassification

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### 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.

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### 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.<sup>1</sup>

This management is important to maintain the health of game herds and the environment.

Outdoor recreation is an important part of New Zealand life and culture. Access to public conservation lands is crucial to ensure that New Zealanders are able to 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.

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<sup>1</sup> 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

## Method

1. The GAC welcomes the decision to review stewardship land administered by the Department of Conservation and is providing this submission on such land presently held on the South Island's West Coast.
  2. Given that there are more than 500 separate parcels of land identified during the West Coast stewardship land process, the GAC does not have the resources to accurately assess, consider and make recommendations on each individual one. Instead, it has focused on key themes it sees as critical when deciding on whether to dispose or reclassify stewardship land. These themes reflect the GAC's statutory mandate, potential impact on the hunting sector and the effective management of game animals.
  3. The GAC also notes that documents relating to the reclassification of stewardship land, their accessibility and the way they are laid out are not user friendly. As the West Coast is the first region to go through the reclassification process, the GAC asks that these aspects be addressed to ensure better transparency and comprehension and encourage greater public involvement.
  4. The GAC is concerned that outdoor recreation is poorly acknowledged in the appraisal documents. In some cases, recreation is said to be non-existent, even in areas noted for their hunting, freshwater angling, whitewater kayaking and tramping. This lack of acknowledgement risks undermining the integrity of the process and needs to be addressed.
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## Key Principles

5. The GAC believes that because there is such a significant area presently designated as stewardship land, then the review must take several key criteria into account before deciding the future of each parcel of land. These criteria are:
  - Any decision must be in the public good, especially where land is disposed of.
  - Recreational use, including hunter and other public access, must be one of the key considerations taken into account when assessing the value of stewardship land as is required by Section 7 of the Conservation Act 1987.
  - Stewardship land should be added to larger areas of the public conservation estate when they border each other, ideally as Conservation Parks to better allow hunting.
  - Disposal or reclassification of stewardship land must not reduce public access to the wider public conservation estate.
  - Stewardship land must be assessed for its potential to provide access to the greater public conservation estate, rivers or foreshore.

- Disposal or reclassification of stewardship land must not impact on hunters' ability to access and help manage game animals.
- Consideration should be given to using stewardship land to swap for other land in order to build public access easements or corridors to conservation land.
- Any public access should not unfairly restrict hunters carrying firearms or being accompanied by hunting dogs in order to reach conservation land for the purposes of hunting.
- Disposal of stewardship land must not be used as a revenue raising exercise for the Department and any funds resulting from sale should only provide for the necessary cost recovery to DOC.
- Any proceeds from the sale of stewardship land should be used to fund the creation of new public accessways and enhancing access routes such as tracks and easements to Public Conservation Land. The funds could also be used to help community conservation and recreation projects.
- Stewardship land must not be sold to interests that will restrict hunter and other recreational or public access.
- If stewardship land is not sold but instead vested with a group or organisation to manage, that vesting shall not result in restriction or obstruction to public access, especially to hunters and other recreational pursuits.
- If stewardship land is to be disposed of, priority should be given to transferring ownership to other statutory organisations, local authorities or community groups to ensure it can be used for recreation or access.
- Fairness for existing concession holders in decisions to dispose or reclassify stewardship land.

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## Public Access

6. Ensuring public access and recreation, for present and future generations, underpins the creation of conservation areas, including Conservation, Forest and National Parks. The GAC believes that ensuring New Zealanders can continue to enjoy public conservation land by having unimpeded access to it is crucial in the stewardship land appraisal process.
7. The wider outdoor recreation community is growing increasingly concerned that access to public conservation land is becoming more difficult as a result of private landowners stopping the public from crossing their land to reach bush, rivers and mountains. This risks reserving enjoyment of New Zealand's public conservation lands to a privileged few. Sufficient safeguards are required to preserve and enhance public access.
8. The GAC notes that Section 7 of the Conservation Act 1987 expressly requires that recreational use, including public access, be taken into account when assessing the value of stewardship land. The GAC believes this requirement is important and before any decision to dispose of or reclassify stewardship land is made, it is assessed for its

potential to provide public access to the public conservation estate, rivers or foreshore.

9. The GAC suggests that to help improve access, stewardship land could be swapped for other land in order to build or create public access easements or corridors to conservation land. If such swaps are not possible, then any funds from the sale of stewardship land could be used to purchase alternative access corridors.
10. The GAC is firmly of the view that no stewardship land should be disposed of to any buyer which would use their ownership to restrict public access, especially by hunters, to conservation land. This includes preventing hunters carrying firearms.
11. The GAC does not support the vesting of stewardship land with any group or organisation to manage if that vesting means restricting, obstructing or otherwise limiting public access, especially to hunting and other outdoor recreational pursuits. This is a particular concern with historic reserves.
12. The GAC notes that there is a large amount of West Coast stewardship land – 182,000 hectares – recommended for reclassification as Historic Reserve. While our country’s heritage must be conserved and protected, this seems an extraordinarily large area. The problem the GAC sees with Historic Reserves is that preserving public access is not guaranteed when they are created, and things like hut construction and maintenance can be neglected. This risk is compounded when Historic Reserves are leased or vested to another non-Crown or local government administering body. This raises the very real threat that the public is locked out of public land, charged to access it or prevented from using it for recreation, including hunting. Because of these concerns, the GAC cannot support such a large area of land being reclassified as Historic Reserve without strict and non-negotiable protection for public recreation and access.
13. The GAC suggests that the public’s champion for access, the Walking Access Commission, should be an integral part of the stewardship land appraisal process to ensure it can execute its statutory functions and ensure public access is preserved or enhanced.

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### **Game Animal Management Implications**

14. As a statutory organisation with responsibilities for hunting and game animals (deer, tahr, chamois and wild pigs), the Game Animal Council is committed to making sure that hunting opportunities are preserved and where possible enhanced and that hunters can effectively contribute to the management of game animal herds.
15. Management of game animals is primarily achieved through the activities of private recreational hunters and if these hunters’ access rights are not preserved, or worse, lost, or restricted, during the stewardship land appraisal, then that will have a

negative impact on the hunting pressure placed on game animal herds on the West Coast. Access for commercial operators for Wild Animal Recovery Operations (WARO), Aerially Assisted Trophy Hunting (AATH) and to ferry hunters into hunting areas also needs to be considered, with guiding policies ensuring that commercial activities that utilise wild animals are supported, contribute to good management outcomes, and are regulated where necessary.

16. The GAC believes that using the stewardship land review to create new national parks, or expand the boundaries of existing ones, could pose a problem to hunters being able to access back country hunting and game animal management opportunities. This is because national parks are more restrictive in what access is allowed which affects hunters using vehicles, hunting with dogs or needing aircraft access.
17. The GAC's statutory requirement to improve hunting opportunities does not align with existing legislation governing national parks, which explicitly promotes the exclusion of game animals from these areas. The GAC's preference is for stewardship land to be reclassified as other conservation land designations and management where that is appropriate, although we acknowledge the practicalities of absorbing certain land parcels into adjoining national parks.

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### **Existing Concessions**

18. The GAC supports the intention of ensuring the reclassification process does not impact the contractual rights of existing concessionaires using stewardship land. Such concessions for tourism activities like guided hunting, guided fishing and grazing licences, provide important sources of income and employment for often remote and economically disadvantaged regions.
19. The GAC agrees that existing rights on stewardship land can continue for the duration of the concession regardless of whether that parcel of land is reclassified.
20. The GAC supports the intention to ensure the reclassification process does not affect access for the gathering of pounamu under the Ngāi Tahu (Pounamu Vesting) Act.

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### **West Coast Stewardship Land**

21. Because the West Coast conservation region is the first to go through the stewardship land assessment process, the GAC believes it is important to establish clear guidelines, practices and precedents for future assessments in other regions.
22. The GAC notes the careful and detailed analysis which has been conducted during the review process of each of the West Coast's 576 stewardship land parcels. The care which has obviously been taken builds confidence in the process.

23. The GAC notes the recommendation to reclassify nearly two thirds of a million hectares as conservation land, including approximately 77,000 hectares as National Park, 347,000 hectares as Conservation Park and 182,000 hectares as Historic Reserve. The GAC is supportive of the proposal to use some of this land to create new conservation parks.
24. Regarding point 12 of this submission, with such a large area of land proposed to become Historic Reserve, the GAC asks for clarification on how hunting and game animals management will be accommodated in these areas. The GAC is happy to work with officials to create a safe, workable policy that protects hunter access to Historic Reserves that are large enough to accommodate hunting.
25. If the concerns from the GAC and other recreation organisations about Historic Reserves can't be addressed, and free, unhindered public access guaranteed, then the GAC would not support such large tracts of public land being, in the worst case, essentially removed from public access and enjoyment.
26. By way of example of the positive benefits resulting from the assessment process is the use of TWP\_36 NaPALIS # 2804986 to create a new conservation park, Kā Tiritiri o Te Moana, in the Paringa area north of Haast. This will provide a continuous sea to alpine stretch of conservation land linking national parks, the Hooker-Landsborough and Hawea Conservation Park. It is a highly valued recreation area and much valued by hunters and other outdoor recreation users.
27. At the same time, the GAC questions why part of this area from the Manakaiaua River south to Paringa River is being specifically excluded from this new park without explanation. To facilitate open and transparent decision-making over the future of public land and its use and enjoyment by the public, a proper explanation needs to be provided for this exclusion.
28. It is also notable that only 66 hectares or 0.01 percent of the assessed stewardship land has been recommended for disposal. However, some of this land includes riparian strips and riverbed which provides valuable access to waterways or nearby bush for outdoor recreation users such as hunters, anglers and trampers. The GAC asks that consideration be given to the idea that instead of selling this land, some could be disposed of by gifting or transferring ownership to local government authorities or statutory organisations, such as Fish & Game New Zealand, to ensure public access remains.
29. Examples of where this could be done include HOK\_20 Aikens Base NaPALIS# 2806317. This is presently identified for disposal but its location right across the road from Arthurs Pass National Park could provide the location of an outdoor recreation accommodation centre or hut.

30. Another example is the Seddonville Tramline KAW\_20 NaPALIS# 2807750. While this plot, as noted in the assessment, holds little intrinsic value in itself, it does provide a potential access route to Mokihinui Forest and associated ecological areas.
  31. Conversely, Mahinapua Store HOK\_29 NaPALIS# 2805695 is the sort of small plot which is a prime candidate for disposal.
  32. As noted earlier in this submission, the GAC views improving public access as a key objective of the stewardship land reclassification process. As the final step in the transfer of land to the conservation estate, the GAC recommends that a concerted effort be made to ensure that public access is improved to these areas, including new tracks and easements to allow New Zealanders to reach the large tracts of bush, mountains and rivers so they can properly enjoy them.
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If you have any queries relating to this submission, please contact me on 021 688 531 or at [tim.gale@nzgac.org.nz](mailto:tim.gale@nzgac.org.nz).

Yours sincerely

A handwritten signature in blue ink that reads "Tim Gale". The signature is written in a cursive, flowing style.

**Tim Gale**  
General Manager  
New Zealand Game Animal Council