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Natural and Built Environment Bill

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

The New Zealand hunting sector is comprised of tens of thousands of recreational enthusiasts and hundreds of commercial enterprises. The activities of both support the economies of small communities across the country due to their proximity to hunting opportunities. This economic support is provided when small communities need it most, outside tourism and agricultural peak seasons. The number of big game (deer, tahr, chamois and wild pig) hunters in New Zealand is hard to estimate, however recent approximations put this at somewhere between 50,000 and 80,000 people.

Hunting is a family affair, with parents and extended family spending quality time exploring New Zealand's wild places with the next generation. This creates an inter-generational connection to nature, for both indigenous and valued introduced species. This connection and the use of wild places through hunting is important to maintain as it provides for community wellbeing through outdoor recreation, food gathering and commercial enterprise.

Hunters also play a key role in the management of wild animals and conservation. 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 the environment and protect indigenous species. Many hunters are also involved in other conservation initiatives protecting indigenous flora and fauna. The

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

driver of hunter contributions to conservation initiatives is often born from the connection built with nature while hunting.

Points of consideration

1. The GAC welcomes the opportunity to provide a written submission on the Natural and Built Environment Bill. Please note that due to the size and complexity of this bill we have not had sufficient resources to assess it in its entirety.
2. The following submission focuses on areas that are the responsibility of the GAC and its statutory mandate regarding game animals and hunting in New Zealand. We have not addressed sections that do not potentially impact game animals, hunters and hunting organisations.
3. The GAC represents the views of not only private recreational hunters, but also industries involved in hunting and game animal management including commercial harvesting and tourist hunting.
4. Revision of the RMA should seek to improve the balance between the protection of our natural environment, and our enjoyment of it, including development.
5. The NBE bill focuses on environmental and development values for supporting current and future generations. The bill omits the importance of valued introduced species to the public and for recreational, mahinga kai and commercial harvest.
6. The bill relies heavily on ecological integrity, mentioned 35 times within 17 clauses. The GAC strongly advises against the use of ecological integrity as it is defined in the Bill because it runs counter to the Purpose of the Act, Part 1 section 3.
 - a. Most, if not all, of New Zealand's ecosystems have been modified by people and often such modifications and their continued modification is important for supporting the wellbeing of current and future generations.
 - b. Ecological integrity is a normative concept, i.e., is subjective and relates to prescribed norms or human values². This means that there are different scientific and stakeholder interpretations of the concept, which will invariably change through time.
 - c. The definition of ecological integrity in the Bill follows a wilderness-normative perspective² - referenced to a pristine state with an absence of human influence. The definition does not explicitly consider societal values. While this may allow for more objective and rigorous assessments of ecological integrity, it runs counter to the Purpose of the Act, i.e., enabling use.
 - d. The Bill incorporates societal values and ecological integrity. However, this creates a conflict where neither is wholly achievable. For example, the wilderness-normative interpretation of ecological integrity suggests there is no

² Schallenberg, Marc, David Kelly, Joanne Clapcott, Russell Death, Callum MacNeil, Roger Young, Brian Sorrell, and Mike Scarsbrook. "Approaches to Assessing Ecological Integrity of New Zealand Freshwaters." In Science for Conservation 307, 1-66. Department of Conservation 2011.

place game animals in New Zealand³. However, the presence of game animals provides significant ecosystem services as recognised by the passage of the GAC Act 2013. Hunting is an important part of New Zealand life and culture, (providing protein for communities and contributing to health and wellbeing) and for conservation support, thus game animals are a fundamental requirement for supporting the well-being of present and future generations.

7. To exhibit ecological integrity as it is defined in the Bill, an ecosystem would maintain itself independently of human influence, exhibiting resilience to natural changes. This separates humans from nature instead of acknowledging that humans are a part of nature.
 - a. Humans have both direct and indirect influences on ecosystems. Indirect influences, e.g., human induced climate change, affect natural changes that impact ecosystem resilience. This influence cannot be removed at specific ecological sites.
 - b. Influences by humans are often required to ensure ecosystems can remain resilient within a changing natural environment. This influence runs counter to the foundation of the ecological integrity concept, i.e., independent indigenous ecological maintenance, and means that humans are acting as a part of nature.
 - c. The development or enjoyment of wild places by humans has and will continue to alter the representation, composition and structure of ecosystems. Whether these actions support improving ecological values or not, the influence of human activity remains in perpetuity, and therefore, humans are not separate from nature.
8. Determining whether human development and use would degrade ecological integrity from a set date is an unfeasible goal.
 - a. Human influence has already affected ecosystems to an unknown degree. The Bill sets environmental limits of degradation from the date of the Bills acceptance. To determine the current levels of ecological integrity degradation across all ecosystems simultaneously would require more resourcing than could be made available at a single point in time.
 - b. The ecological integrity concept is subjective and therefore any assessment of its degradation is also subjective, e.g., what is considered an improvement to one person may be considered degradation to another. Therefore, the approval of any use may be contested from an ecological integrity perspective.
9. The GAC recommends the use of the concept **ecological health** in this Bill to replace ecological integrity, for the following reasons:
 - a. Ecological health is similar to ecological integrity, but it defines the state of an ecosystem in terms of influencing stresses, and its ability to provide products and processes for both ecological and economic purposes². Thus, it aligns with the Purpose of the Act, e.g., ecosystem health indicates the preferred state of ecosystems that have been modified by human influence, ensuring that their ongoing use does not degrade them for future use².

³ McGlone, M. S., K. McNutt, S. J. Richardson, P. J. Bellingham, and E. F. Wright. "Biodiversity Monitoring, Ecological Integrity, and the Design of the New Zealand Biodiversity Assessment Framework." *New Zealand Journal of Ecology* 44, no. 2 (2020).

- b. Ecological health provides a place for valued introduced species including game animals³, important for supporting the wellbeing of current and future generations.
- c. The GAC acknowledges that there needs to be a focus on indigenous species, but this can be prescribed in a less limiting way than through application of one interpretation of the ecological integrity concept.
- d. The GAC requests to speak to this submission to further explain the benefits and better alignment of applying ecological health to this Bill, in place of ecological integrity, for balancing environmental protection and human enjoyment, including development.

Summary

- Revision of the RMA should seek to improve the balance between the protection of our natural environment, and our enjoyment of it, including development.
- The GAC strongly advises incorporating valued introduced species and their importance to the public and for recreational, mahinga kai and commercial harvest into the Bill.
- The GAC strongly advises against the use of ecological integrity as it is defined in the Bill because it runs counter to the Purpose of the Act, Part 1 section 3.
- The Bill should acknowledge humans as a part of nature and focus on ensuring human use supports maintaining or improving ecological values.
- Ecological values should be defined in the Bill so that they can be feasibly assessed and are not open to interpretation to provide timely and consistent decision making and confidence in permitted use and development.
- The GAC strongly advises the replacement of ecological integrity with ecological health, and the addition of provisions to focus on indigenous biodiversity, but not so far as to exclude the presence of valued introduced species.
- The GAC requests to speak to this submission to further explain the benefits and better alignment of applying ecological health to this Bill, in place of ecological integrity, for balancing environmental protection and human enjoyment, including development.

Contact

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Yours sincerely



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