

1 June 2023

Strategy, Investment and Pricing Team
Context, Issues and Options
Discounts Policy Review



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Discounts Policy Review - Context, Issues and Options Paper

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.

New Zealand Hunting Sector

It is estimated that 50-60,000 New Zealanders are involved in large game animal hunting (deer, chamois, tahr and wild pigs) each year, with around 34,000 individuals obtaining permits to hunt on public conservation land.

Hunters play a key role in game animal management, and it is estimated that recreational hunters alone are responsible for harvesting approximately half a million game animals and pest goats each year. Hunter-led game animal management and conservation programmes, as well as projects that seek to restore huts and tracks, are an important part of the hunting sector's voluntary contribution to conservation and recreation, and the preservation of New Zealand's backcountry heritage.

Questions

Which option are you most aligned with and why?

Option 3: Status Quo, however, we are disappointed that further options are not provided that seek to increase the provision of discounts to younger people and volunteer groups. Providing financial assistance to help increase the participation of these people in conservation and recreation has broad long-term benefits.

The GAC sees fostering recreation as a key focus for the Department of Conservation. Providing youth and school discounts is a means by which the Department can help incentivise participation in outdoor recreation and engagement with public conservation land (PCL) from an early age.

- From 1 July 2023 (when hut fees are proposed to increase), these discounts save a family with four school-age children \$25 per night when they use a serviced hut without a Backcountry Hut Pass.

Discounts for organisations that voluntarily contribute to conservation and recreation are a small but symbolically important reward that should be maintained. The GAC believes community-led conservation and recreation initiatives are critical in helping to manage public conservation land and devolving responsibility for these activities out to communities should be encouraged and incentivised.

What kinds of discounts should DOC provide? Can you please provide some examples.

The GAC considers age-based (with an emphasis on young people) and volunteer discounts to be appropriate in the New Zealand context. We do not believe DOC should be tasked with implementing income-based discounts.

Discounts for those with disabilities could be considered, although these would have debateable practical use given the difficulty disabled people have in accessing the facilities incorporated in the discounts.

What are your views on DOC providing discounts to support social outcomes (e.g. to support access for families)?

As stated above, the GAC supports discounts that encourage participation in outdoor recreation and engagement with conservation and public conservation land. Supporting access for families by helping to make the use of huts etc more affordable is one small way to help achieve that.

What are your views on DOC using discounts to incentivise or reward organisations who contribute to conservation or recreation on public conservation lands and waters?

As stated above, the GAC supports the maintenance of discounts for organisations that contribute to conservation and recreation. These rewards are modest when compared to the effort put in by many community groups. In the hunting sector there are a number of organisations that contribute many hundreds of labour-hours to predator trapping, native species protection, hut maintenance and track clearance. The GAC is concerned that the bar in terms of volunteer labour (>1,000 hours) is set too high. 1,000 hours is the equivalent of 0.5 FTE. Currently, only members of the NZ Deerstalkers Association receive a discount under the scheme.

Should the level of discount differ when discounts are used to support social outcomes compared to rewarding organisations that contribute to conservation or recreation?

Discounts that will help incentivise young people to engage in recreation and conservation need to remain significant-enough that they provide families with a meaningful cost-saving (e.g., a half-price annual Backcountry Hut Pass represents an \$80 saving). By comparison,

present discounts that act as a reward for contributions to recreation or conservation do not include significant cost-savings for the individual and are therefore largely symbolic.

The consultation does not consider any options where discount levels can be set higher than the status quo, which is disappointing. The GAC would like to see this reconsidered.

Do you think DOC should be able to take away discounts for recipients that show poor behaviour or for misusing them? (The current discount policy does not have this ability).

Yes, however careful criteria would need to be developed. Discounts that apply to youth and school-age children should, for obvious reasons, not be considered for removal. Removal of reward discounts for poor behaviour could be considered, however there are some obvious problems when it comes to adjudicating responsibility. The GAC is also doubtful that the necessary effort needed to develop and implement such a process is the best use of the Department's resources.

Do you think that DOC's Process for Discount Applications is reasonable and fair and easy to understand? For example, is there a better way to measure contributions to conservation that is fair and equitable?

No, the *Discounts Application Form* is not on the *Discounts for Organisations* page on DOC's website. We only found it on the page relating to the Discounts Policy Review and buried within the document, *Interim policy – recreational facilities and services discounts* – please also note the incorrect spelling of this document in the link online. Currently organisations interested in applying for a discount must email agents@doc.govt.nz, which creates another unnecessary step in the process and another barrier to application.

The GAC also considers >1,000 volunteer hours per annum (and its monetary equivalent) to be an unreasonable minimum level of contribution that unfairly penalises smaller community groups undertaking conservation and recreation initiatives. This should be reviewed.

Discounts can mean that DOC has less revenue to carry out its other conservation and recreation work. How should DOC balance its use of discounts against other considerations like cost recovery?

The GAC sees incentivising participation in outdoor recreation and engagement in conservation as a worthwhile investment and believes the overall value gained from helping to encourage young people to access PCL far outweighs the cost to the Department.

The GAC is also of the opinion that DOC must seek to devolve more conservation and recreation initiatives to community organisations if New Zealand wants to achieve our broader objectives when it comes to the management of PCL. Recognising volunteer effort through reward discounts is a small but symbolically-significant way to help encourage and incentivise community involvement in recreation and conservation.

The Game Animal Council acknowledges that the Context, Issues and Options Paper will be followed by further papers on the purpose for discounts and the preferred option, as well as detail for that preferred option, and we look forward to submitting on those.

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

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