

15 November 2023

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



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Discounts Policy Review – Proposed Policy Changes

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.

Previous consultation

The Game Animal Council submitted on the Context, Issues and Options Paper, but was not directly advised of the second round of consultation on the Purpose and Options, for Discussion. Unfortunately, this meant we missed out on the opportunity to submit on that consultation. We accept this was an oversight and seek to reengage in this third consultation process.

Questions

1. *Do you agree with the approach for Community Service and Gold Card 'combo card' holders? If so why; if not, why not?*

Our submission on the Context, Issues and Options Paper stated that 'we do not believe DOC should be tasked with implementing income-based discounts.' However, if the proposed approach for Community Service and Gold Card 'combo card' holders can be achieved efficiently and is easy to access for card holders, we see merit in it, particularly in helping to encourage communities that have not historically engaged in outdoor recreation and conservation.

2. *Do you agree with removing discounts for primary and secondary schools? If so why; if not, why not?*

No. The GAC believes fostering recreation and engagement in conservation and public conservation land should be a key focus for the Department of Conservation. Providing schools discounts is a means by which the Department can help incentivise participation in

outdoor recreation and engagement in conservation from an early age and in an educational setting. While we recognise the argument that because children and young people already gain individual discounts, providing discounts to schools would be a form of 'double-dipping', it should also be acknowledged that many school budgets are extremely tight and any reduction in costs helps support a school's outdoor recreation activities.

- 3. Do you agree with new approach (figures and ratios) for assessing reward discount levels? If so why; if not, why not?*

There is sense in simplifying the assessment of reward discount levels, which is achieved through the new approach.

The GAC remains concerned that the discount levels are extremely low (10 and 20 percent do not present significant cost savings), and the higher 20 percent rate is only achievable for larger organisations that can achieve the \$250,000 minimum contribution.

We would also like to see discounts apply to both Backcountry Hut and Campsite passes as well as Great Walk facilities and sole occupancy facilities.

- 4. Is there anything you wish to add that we may have missed in this review?*

The GAC considers participation in outdoor recreation and conservation to be of wider community and national benefit. Encouraging participation in active recreation is a health and wellbeing priority for other agencies (e.g., Sport New Zealand – Active Recreation for Rangatahi Action Plan) and should be reflected in the Department's approach to discounts.

The GAC also considers further devolution of conservation and recreation initiatives to community organisations to be a positive outcome, particularly when considering the limitations of current and future Departmental budgets. Recognising volunteer effort through reward discounts and providing outdoor experiences at reduced costs to schools and other groups are a means to help encourage and incentivise community involvement in recreation and conservation over the long-term.

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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