

19 April 2024

Committee Secretariat
Environment Committee
Parliament Buildings
Wellington



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Submission on the Fast-track Approvals Bill

About the New Zealand Game Animal Council

1. The New Zealand Game Animal Council (GAC), established under the Game Animal Council Act 2013, is a statutory entity with responsibilities for, *inter alia*, advising and making recommendations (in relation to game animals) to the Minister of Hunting and Fishing (previously Minister of Conservation), raising awareness of the views of the hunting sector, and liaising on and managing aspects of game animal hunting.
2. 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

3. It is estimated that 50-60,000 New Zealanders are involved in large game animal hunting 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.¹
4. Recreational hunting and wild food gathering are an important part of many New Zealand communities. Access to public conservation lands and game animals is critical to ensure that hunters can reach the places they value for recreation, food gathering and in order to contribute to conservation.
5. 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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6. This submission does not address the Bill's intent or analyse the justifications for it. Instead the submission focusses on aspects of the Bill that relate to the GAC's statutory responsibilities, specifically:
 - a. Maintaining public (hunter) access
 - b. The implications for the management of game animals

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

7. The GAC joins other conservation and recreation organisations with concerns at elements of the Bill that provide a small group of ministers with the ability to approve projects that may override important conservation protections and/or restrict public access to public conservation land and game animals.

Maintaining public (hunter) access

8. The GAC believes that ensuring New Zealanders can continue to enjoy public conservation land by having unimpeded access to it is critical and we are concerned that the approval of projects under this legislation could erode that unless the application and approval process is appropriately managed.
9. The GAC does not support development that restricts, obstructs or otherwise limits public access, especially for hunters carrying firearms or with dogs.
 - a. We would like to see explicit protection for public access to public resources (including game animals) in the legislation.
10. Recreational use, including hunter and other public access, must be a key consideration when both the expert panel and Joint Ministers consider eligible projects. Typically, development of public lands brings with it restricted public access.
 - a. While we acknowledge the provisions in 19(1)(b) and 19(4) to gain comment from relevant ministers and invite comments from any other person, in the decision to refer an application to the expert panel, we would like to see a more specific commitment to consult with the Minister for Hunting and Fishing, as well as statutory organisations that can provide specific expertise in public use and access, namely the GAC, Fish and Game New Zealand, and the Outdoor Access Commission.
11. Limitations on the public's right to access risks reserving the recreational enjoyment of New Zealand's public conservation lands to a privileged few. The GAC would like to see additional safeguards incorporated in the legislation to preserve and protect public access.
 - a. These safeguards could include the provision of public accessways that bypass land a project is approved to utilise, but that allows for access to public conservation land adjacent to it.
 - b. Offsets are also an option, although it is often difficult to achieve like-for-like substitution when it comes to public access.

Game animal management

12. 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.
13. Management of game animals across public conservation lands is currently primarily achieved through the activities of private recreational hunters. If hunters' ability to access parcels of public conservation land is eroded through the approval of projects that restrict this access, then that directly impacts the hunting pressure placed on game animal herds (as well as goats etc) in that location and may lead to poorer game animal management and conservation outcomes, e.g., over-population and over-browse of palatable species.

14. Access for commercial operators for Wild Animal Recovery Operations (WARO), Aerially Assisted Trophy Hunting (AATH) and to transport recreational hunters into hunting areas is also part of this access-management matrix. Projects that restrict this kind of access will also impact game animal management outcomes.
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If you have any queries relating to this submission, please contact me on 021688531 or at tim.gale@nzgac.org.nz.

Yours sincerely



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