



New Zealand Deerstalkers' Association Inc

3 Collina Terrace Thorndon Wellington

PO Box 12015, Thorndon, Wellington 6144

Phone: 04 499 6163 Fax: 04 472 5976

Email: info@deerstalkers.org.nz

Website: <http://www.deerstalkers.org.nz>

NEW ZEALAND DEERSTALKERS ASSOCIATION

SUBMISSION TO THE MINISTRY FOR THE ENVIRONMENT

ON INDIGENOUS BIODIVERSITY NATIONAL POLICY STATEMENT

10 March 2020

INTRODUCTION

The New Zealand Deerstalkers Association welcomes the opportunity to provide its submission on the drafting of the Indigenous Biodiversity National Policy Statement.

The NZDA places a high value on this country's unique biodiversity. It and its members are already actively involved in protecting our native wildlife through predator trapping programmes and on the ground efforts to control invasive plant species, such as wilding pine.

The NZDA supports the proposal that there should be no reduction in existing biodiversity and species range or numbers. Our organisation supports the goal of restoration and enhancement.

However, the NZDA is concerned the draft NPS consultation document concentrates solely on indigenous biodiversity when the national biodiversity strategy which will provide the strategic direction on this issue for the next 50 years incorporates all biodiversity.

As a result of this narrow focus, the NPS consultation document omits any mention of introduced species being valued or regarded as taonga and how such Valued Introduced Species will be accommodated by local government.

It is also concerned that there is no mention of any role for the statutory organisations tasked with overseeing game birds and animals in the formulation of the NPS or its implementation by local government. This omission should be corrected.

The NZDA's detailed submission on these points and others is explained below, along with background information reinforcing the organisation's role as a significant stakeholder in any discussion on biodiversity.

BACKGROUND

1. The New Zealand Deerstalkers Association is a voluntary organisation. It has existed for 80 years and was first incorporated in 1939 under the Incorporated Societies Act 1908.
2. The NZDA represents more than eight thousand members in 49 branches throughout the country. These branches are in both urban and rural areas.
3. It is NZDA policy that the organisation is apolitical.
4. The NZDA receives no public money. It is funded entirely by its membership.
5. The NZDA's fundamental purpose is to protect the traditions of recreational hunting while protecting, advancing and advocating for the rights of recreational hunters.
6. The organisation's constitutional objectives include upholding hunting ethics, supporting outdoor recreation, championing public access to our mountains, bush and wild country and strenuously opposing commercial exploitation of New Zealand's wildlife, public lands and public and natural resources.

7. The NZDA's interest is in introduced game animals for cultural, traditional and recreational reasons. These reasons include hunting and food gathering.
8. Those species are all mammals and include eight types of deer – Red, Fallow, Rusa, Sika, Sambar, Whitetail, Wapiti and Moose. Other species are Himalayan Tahr, European Chamois, Wild Boar and Feral Goats and Sheep. Some of these species are rare and localised, while others are widely distributed throughout the country.
9. These animals are recognised in statute as belonging to the Crown, which in effect means they belong to all the people of New Zealand.
10. NZDA members, hunters generally and members of the wider public highly value these animals for a variety of reasons. These include the challenge of the hunt, the chance to put food on the table, photographic opportunities, literature and the sheer aesthetic pleasure of viewing wild mammals in the outdoors.
11. NZDA members also highly value the outdoors and remote places where these animals live for their physical, mental and spiritual health benefits, and the resilience and self-reliance they provide the individual.

CONSERVATION ROLE

12. The NZDA is more than just a hunting association. It is actively involved in conservation work and a key organisational and constitutional objective is to foster interest in native flora and fauna and their conservation.
13. This keen interest in New Zealand's unique habitat and species is exemplified by the rediscovery of the takahe by the NZDA's founder.
14. NZDA members remain active in conservation efforts to protect indigenous wildlife. This work includes controlling predators in remote areas such as Fiordland with well organised and maintained trapping lines staffed by NZDA volunteers.
15. The NZDA is also active in targeting plant pests, including wilding pines with concerted efforts by members on the ground to remove them.

16. The NZDA recognises that populations of introduced animals must be kept in balance with the many environments they live in. Members volunteer their time, money and effort to controlling animal populations on public and private land at no cost to the landowner or public purse.
17. The NZDA believes that hunting and other outdoor recreational pursuits are the path to conservation appreciation.

PUBLIC GOOD

18. The NZDA actively contributes to the wider public good through its work preserving, maintaining and constructing conservation estate infrastructure.
19. NZDA members maintain huts and tracks within the conservation estate to reduce the financial burden on the Department of Conservation.
20. The NZDA is a strong advocate for ensuring New Zealand's mountains, bush and rivers are not locked up by commercial or private capture. This advocacy benefits all New Zealanders who enjoy and value the great outdoors and wild, natural places.

BIODIVERSITY STRATEGY AND NPS

21. The NZDA supports the current review of how biodiversity is managed in New Zealand and the subsequent drafting of a National Policy Statement to provide guidance on how this strategy should be implemented under the country's most significant environmental law, the Resource Management Act.
22. The NZDA is already actively involved in creating this new strategy to ensure it is realistic, fit for purpose, achieves its goals and recognises the ecological reality of New Zealand today.
23. However, the NZDA is concerned the draft NPS consultation document concentrates solely on indigenous biodiversity when the national biodiversity strategy which will provide the strategic

- direction on this issue for the next 50 years incorporates all biodiversity.
24. As a result of this narrow focus, the NPS consultation document omits any mention of introduced species being valued or regarded as taonga and how such Valued Introduced Species will be accommodated by local government.
 25. The NZDA firmly believes that any review or reappraisal or recasting of what biodiversity in New Zealand means must take into account the huge range of biodiversity which now exists. This includes indigenous, native and introduced species, how they interact, and the modified landscapes and environments in which they live.
 26. The NZDA asks that any NPS take into account the statements in the **Te Koiroa o Te Koiora** biodiversity strategy consultation document which acknowledges introduced species have value - economic, social, cultural and recreational. It must also be acknowledged such species enjoy a large and pragmatic constituency of support.
 27. The NZDA believes it is necessary for the NPS to make such acknowledgements in light of the statement in the **Te Koiroa o Te Koiora** document that New Zealand's ecosystems cannot return to the undisturbed state they were in 800 years ago before the arrival of the first settlers.
 28. Further, the NPS must also take account of **Te Koiroa o Te Koiora** statement that *"non-indigenous biodiversity is neither 'all good' nor 'all bad' and that the new biodiversity statement is being developed "on behalf of all New Zealanders"*.
 29. While this overarching biodiversity strategy is still being drafted and not publicly available for view before the deadline for NPS submissions, the NZDA firmly believes the final strategy must strive to ensure it achieves these goals and does not alienate a large proportion of the population.

NATIONAL POLICY STATEMENT'S IMPLEMENTATION REQUIREMENTS

30. The NZDA supports the sentiment in 3.7 Page 19 that in implementing the NPS, local authorities must take account of the wider community's social, economic and cultural wellbeing.
31. In particular, the NZDA supports the requirement that local authorities must recognise "*c) people are critical to maintaining and enhancing indigenous biodiversity; and d) the importance of forming partnerships between local authorities, tangata whenua, landowners, people and communities...*"
32. The NZDA believes its track record in environmental protection makes it ideally positioned to be part of this community consultation process. The NPS should make it clear that local government consultation with the community on biodiversity must be with the wider community and not an artificial or politically skewed selection.
33. The NZDA is also concerned by the absence of any requirement in the NPS for local government to consult or work with the statutory organisations which exist to manage game birds and animals. Parliament established Fish and Game and the Game Animal Council with the specific responsibilities to look after the interests and welfare of game species and hunters. As a result, it should be mandatory under the NPS that if game species are affected, the local authority involved must work with these organisations.
34. This requirement is particularly relevant when local authorities are drafting Regional Biodiversity Strategies (Page 28 3.18). The NZDA suggests that the statement "(1) Every regional council must prepare a regional biodiversity strategy in collaboration with territorial authorities, tangata whenua, communities and other identified stakeholders" should be amended to specifically include the statutory organisations Fish and Game and the Game Animal Council.
35. The NZDA also believes that the two statutory organisations Fish and Game and the Game Animal Council should be part of the process in drafting the NPS on Indigenous Biodiversity.

36. The NZDA firmly believes that any NPS should require local authorities to ensure development or commercial exploitation does not compromise or prevent public access to the outdoors and enjoyment of this country's unique biodiversity.

THE PLACE OF VALUED INTRODUCED SPECIES IN A NATIONAL POLICY STATEMENT

37. Concern about diminishing biodiversity and how to prevent any further reduction in what exists today is not confined to New Zealand. It is a global issue and one which nearly 30 years ago resulted in the drafting of the International Convention on Biological Diversity.
38. As a signatory to that convention, New Zealand has an obligation to conserve biodiversity. That obligation is not confined to New Zealand's endemic or native life, but covers all species.
39. This obligation is covered in Article 9 of the International Convention in Biodiversity which requires each contracting party to the convention to “..adopt measures for the ex-situ conservation of biological diversity..” In this case, ex situ refers to conserving species outside their country of origin.
40. The convention's Article 9 also requires signatories including New Zealand to help the recovery of threatened species no matter their country of origin and adopt measures for their reintroduction to their original range.
41. Any National Policy Statement providing guidance on biodiversity must take account of these points and New Zealand's international obligations.
42. The new biodiversity strategy, and by default any NPS, must acknowledge that many species brought to New Zealand by humans provide a positive value. This value is not always expressed in monetary terms but can also be appreciated in recreational, traditional and cultural ways.
43. The NZDA recommends that such species be acknowledged with the term “Valued Introduced Species” or a similar such description.

44. To this end, negative references to game animals as “pests” should cease. This description is not legally valid and they should instead be referred to as wild animals, as defined by present legislation such as the Wild Animal Control Act 1977 and the Game Animal Council Act 2013.
45. The NZDA supports the first of the fundamental concepts of the NPS consultation process – Hutia Te Rito. We recognise our organisation’s responsibilities as kaitiaki and its role in ensuring te haora o te taonga – the health of species and ecosystems which are taonga.
46. The NZDA believes that such taonga include a range of Valued Introduced Species, from kumara through to game animals like deer.
47. Hunting and the outdoors are important in many of the cultures in our society, including Tangata Whenua. These activities contribute to enhancing traditional and cultural identity and the pursuit of introduced animals, combined with associated activities, has a strong role to play in reinforcing and maintaining this identity.
48. The NZDA’s conservation work and public good contribution is a good example of the benefits provided by valued introduced species like deer. New Zealand would be poorer economically, recreationally and culturally without these animals and New Zealanders would be poorer mentally, physically and spiritually without the chance to pursue and harvest them.

CONCLUSION

49. The NZDA supports all efforts to protect our natural heritage and that there should be no reduction in existing biodiversity and species range or numbers. Our organisation supports the goal of restoration and enhancement.
50. However, the NZDA believes the draft NPS consultation document is too narrowly focussed on indigenous biodiversity when the national biodiversity strategy which will provide the strategic direction on this issue for the next 50 years incorporates all biodiversity. Failing to take into account the overarching strategy

which will inform any drafting of a NPS on biodiversity is a serious failure.

51. As a result of this narrow focus, the NPS consultation document omits any mention of introduced species being valued or regarded as taonga and how such Valued Introduced Species will be accommodated by local government.
52. The NZDA asks that any NPS take into account the statements in the **Te Koiroa o Te Koiora** biodiversity strategy consultation document which acknowledges introduced species have value - economic, social, cultural and recreational.
53. The NZDA asks that in the formulation of the NPS, that there is acknowledgement that New Zealand's ecosystems cannot return to the undisturbed state they were in 800 years ago before the arrival of the first settlers.
54. The NZDA asks that the NPS must also take account of the **Te Koiroa o Te Koiora** statement that *"non-indigenous biodiversity is neither 'all good' nor 'all bad' and that the new biodiversity statement is being developed "on behalf of all New Zealanders"*.
55. The NZDA firmly believes that any NPS should require local authorities to ensure development or commercial exploitation does not compromise or prevent public access to the outdoors and enjoyment of this country's unique biodiversity.
56. The NZDA asks that the NPS explicitly recognises the statutory organisations which manage game birds and animals, Fish and Game and the Game Animal Council.
57. The NZDA asks the NPS make it mandatory that when formulating biodiversity strategies, local authorities must consult and work with these statutory organisations.