

13th March 2020

NPSIB Consultation
Ministry for the Environment



Submission on the Draft National Policy Statement for Indigenous Biodiversity

1. The Game Animal Council

The Game Animal Council (GAC), established under the Game Animal Council Act 2013, is a statutory organisation with responsibilities for, inter alia, representing game animal hunters, and advising on and managing aspects of game animal hunting. Game animals are feral pigs, chamois, tahr, and all species of deer.

2. Game animals as a resource for New Zealand

New Zealand's game animals are an important recreational, social and economic resource. The general public of New Zealand values game animals. Over 150,000 people harvest small game, large game or gamebirds at some time during each year.

All game species in New Zealand are harvested for food, and while deer farming accounts for the vast majority of game meat exports, shot wild game is significant in both export statistics and domestic consumption.

The combination of recreational hunting and aerial recovery expertise developed over the past 50 years allows privately funded control and management of New Zealand's big game populations at no cost to the government.

3. Game species as an economic resource

The deer industry has total export earnings of \$322 million (year ended 2018). New Zealand venison and velvet returns have been at record prices, assisted considerably by the perception internationally of venison as a safe food item. Consumers have traditionally perceived venison to be a hunted product and often do not differentiate between farmed and hunted sources at the point of purchase or consumption. New Zealand, as country of origin,

enjoys an unparalleled reputation for its farming, environmental and animal husbandry practices.



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The guided hunting industry has earnings of approximately \$35 to \$40 million annually and has considerable potential for expansion. Internationally, New Zealand is considered to be the world's premier destination for hunted red deer stags and Himalayan tahr and is increasingly recognised for the quality of its other game species. It is considered a safe, stable, unpolluted country, and attracts a discerning, influential hunting clientele.

The total gross sales effect New Zealanders on recreational hunting has recently been calculated to be in the order of \$350 million annually. Large game species are a major focus of that hunter spend. Less easy to quantify, but probably of greater significance, is the role hunting plays in the national health statistics as a form of recreation enjoyed by tens of thousands.

4. The Hunting Sector and Conservation

The Game Animal Sector provides many benefits to conservation in New Zealand. This includes predator trapping as provided by the Fiordland Wapiti Foundation and the Central North Island Sika Foundation, plus back country hut building and maintenance as provided by the Rakiura Hunters Huts Trust, New Zealand Deerstalkers' Association and Safari Club International.

5. Submission

5.1 Relationship between the NZ Biodiversity Strategy (NZBS) and the National Policy Statement for Indigenous Biodiversity (NPSIB)

The Draft NZBS is inclusive of all biodiversity not just indigenous biodiversity. Deer, tahr, chamois and wild pigs are part of this inclusion and collectively with other species such as trout, salmon, ducks, pheasants, quail etc they are categorised as valued introduced species.

There is acceptance that these animals are now part of New Zealand and are valued. Wayne Fraser in his 2001 study of public views towards introduced wildlife found that when asked the question, "how long does an introduced animal species need to be present before it can be considered as part of the "natural" fauna?" It is worthy to note that the median value



was 100 years. This suggests that we may be approaching a time when introduced animal species gain greater acceptance among the general public to the extent that a significant proportion of people come to regard them as a "natural" part of our environment. Deer, tahr, chamois and wild pigs have all been in New Zealand for over 100 years with some approaching 200 years.

New Zealand's biodiversity is a melting pot – some species have evolved here in isolation for many millions of years, whereas others are much more recent arrivals.

Many species have been introduced to New Zealand over the last 800 years – whether through natural, intentional or unintentional means. These non-indigenous species have become the basis of our economy through agriculture and forestry; others are valued for their contributions to social and cultural wellbeing, such as recreation and amenity. Non-indigenous species can sometimes play a positive role in creating ecosystems that support indigenous species – for example, kiwi and kārearea (falcon) are thriving in some radiata pine habitats. Other non-indigenous species are unwanted and not valued. They threaten indigenous species and ecosystems, through predation, browsing, disease and competition, and can cause a nuisance to people.

Nature is intrinsically valuable, and humans have a responsibility to safeguard and protect it. The draft NZBS prioritises the special responsibility we have for indigenous biodiversity and acknowledges that non-indigenous biodiversity is neither 'all good' nor 'all bad'.

Developing approaches which provide for the multiple values people have for different species, both indigenous and non-indigenous and achieving a balance that recognises non-indigenous animals which are valued are key to overall biodiversity conservation.

The draft NPSIB is out of step with the draft NZBS as it focusses solely on indigenous biodiversity. The NZBS which will guide the strategic direction on this issue for the next 50 years incorporates all biodiversity and the NPSIB should be in step with the NZBS

As a result of this narrow focus, the NPSIB 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.

The GAC recommends that the NPSIB 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. It must also be acknowledged such species enjoy a large constituency of support. For both the NZBS and



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the NPSIB to be successful, they must ensure they do not alienate a large proportion of the population.

It would therefore be prudent to allow finalisation of the NZBS before completing the NPSIB. If we are truly to embrace both indigenous and non-indigenous biodiversity, then there should equally be such a national policy statement on both. In fact, just one all-inclusive policy statement would be a major step in the right direction.

5.2 Specific Provisions

5.2.1 Correct terminology

Deer, tahr, chamois and wild pigs are not generically pests, as 'pest' has a legal definition under the Biosecurity Act 1993. They are legally Wild Animals under the Wild Animal Control Act 1977, or, Game Animals under the Game Animal Council Act 2013, unless specifically included in a national or regional pest management plan under the Biosecurity Act 1993.

5.2.2 Community involvement

As expressed above, the GAC sees community involvement and support as being critical to biodiversity conservation and supports that when implementing the NPSIB, local authorities must take account of the wider community's social, economic and cultural wellbeing and must recognise "*that 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...*". This requirement should be in the widest sense and truly representative of the interests. The hunting sector is one of the key sectors with interests and the Game Animal Council is the statutory body set up to represent the interests of the hunting community.

The GAC recommends that when local authorities are drafting Regional Biodiversity Strategies (Page 28 3.18). The Game Animal Council recommends 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 such as the Game Animal Council.



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5.2.3 The contribution valued introduced species make to global biodiversity

The International Convention on Biological Diversity of which New Zealand is a signatory to means New Zealand has an obligation to conserve biodiversity. That obligation is not confined to only indigenous wildlife but covers all species. Under the treaty, New Zealand must “adopt measures for the ex-situ conservation of biological diversity” in 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. New Zealand has a number of species such as rare breeds of domestic species that are genetically different from the source stock and game animals such as Himalayan tahr that would fall into this category. The NPSIB must take account of such species and provide for their conservation.

5.2.4 The contribution valued introduced species make to New Zealand

Modern New Zealand’s ecological reality is comprised of an array of unique indigenous biodiversity as well as a substantial number of introduced species, many of which form the basis of New Zealand’s food crops, economy and recreational pursuits. As a society we have diverse values regarding nature, and people value both indigenous and non-indigenous biodiversity for the social, cultural environmental and economic benefits they provide. Ultimately, New Zealand’s economic activity provides for the restoration and protection of indigenous biodiversity and much of this economic activity is based on valued introduced species

Valued introduced species and ecosystems should be managed for the cultural, economic and recreational values these species provide whilst maintaining or enhancing indigenous biodiversity. This is an opportunity to embrace valued introduced species in a collaborative way that helps drive indigenous biodiversity conservation and restoration. This will benefit nature, our wellbeing and our economy.

This GAC recognises the special responsibility we have towards indigenous species - because they are special to New Zealand and found nowhere else - and the importance of considering this when making decisions on non-indigenous biodiversity and its benefits to people’s wellbeing. The GAC also recognises that non-indigenous species can benefit indigenous biodiversity, for example by providing habitat, and that indigenous and non-indigenous biodiversity can be integrated into the places where we live, work and play.

Hunting and the outdoors are important in many of the cultures in our society, providing many with one of the necessities of life, food. Hunting has a strong role to play in reinforcing and maintaining who we are as New Zealanders. Therefore, the GAC's recommendation is that any NPSIB must include valued introduced species.



5.3 Role of the GAC going forward

The GAC has a history of working constructively and cooperatively with many agencies and will continue this approach. The Council offers its assistance and expertise to those who will draft the NPSIB.

6. Summary

The GAC supports efforts to protect our natural heritage, the goal of restoration and enhancement and that there should be no reduction in existing biodiversity.

The NPSIB should be consistent with modern thinking, be in line with the final NZBS and be expanded to include all biodiversity, especially valued introduced species such as deer, tahr, chamois and wild pigs.

Many New Zealanders are unwilling to accept that their support for the conservation of native species and ecosystems must necessarily come at the cost of denying any place in New Zealand's wild lands for valued introduced species such as deer, tahr, chamois and wild pigs. A NZBS and NPSIB that are enlightened, take action to conserve our most critically endangered species, embrace both indigenous and valued introduced species, engender a sense of public ownership and enable all New Zealanders to directly participate in conservation will have a much higher likelihood of success.

The Game Animal Council would welcome the opportunity to speak to this submission. If you have any queries relating to this submission, please contact me on 021688531.

A handwritten signature in blue ink that reads "Tim Gale".

Tim Gale
General Manager
NZ Game Animal Council