



New Zealand Deerstalkers' Association Inc **RAKAIA BRANCH (est. 1959)**

c/- PO Box 273, ASHBURTON 7740

8th March, 2020 (revised)

Submission to:

Attn: Biodiversity Team,
Ministry for the Environment,
PO Box 10 362,
Wellington 6143.

Email: indigenusbiodiversity@mfe.govt.nz

SUBMISSION – DRAFT NATIONAL POLICY STATEMENT FOR INDIGENOUS BIODIVERSITY

Thank you for the opportunity to make a Submission on the draft National Policy Statement for Indigenous Biodiversity.

This Submission is made on behalf of the Rakaia Branch of the NZ Deerstalkers Association, Inc. (hereinafter referred to as “NZDA Rakaia”), an NGO.

Our Submission does not delve into the question-by-question detail of the Discussion Document / Submission Tool – instead, we oppose the draft National Policy Statement for Indigenous Biodiversity in its entirety, as drafted – for reasons we detail below.

1. New Zealand Deerstalkers Association Incorporated

Founded in 1938, the New Zealand Deerstalkers Association Inc. advocates for recreational big game hunting for its 7,000-odd members spread across almost 50 Branches around New Zealand.

Founded in 1951, the NZ Deerstalkers Association Rakaia Branch Inc. (NZDA Rakaia) similarly advocates for its 100-odd members.

NZDA Rakaia is strongly motivated to strive to have a positive influence on maintaining an appropriate, integrated management regime for New Zealand’s modern biodiversity (both indigenous, and introduced).

2. New Zealand Heritage and Culture around Biodiversity

Everyone born in New Zealand was born into a society that has a strong heritage and generally good, positive culture - that is widespread, and improving - around our modern biodiversity. Nowhere is this more the case – than amongst particularly the significant number of people and households in our society that make best use of the ability to sustainably harvest from our mainly introduced biodiversity, for recreational and food-gathering purposes.

Amongst those for whom this heritage and culture forms part of our way of life – our mainly introduced biodiversity is central to the epitomisation of our healthy wellbeing, and what it means to be positively and quintessentially Kiwi.

3. Agreed Need for Improved Biodiversity Management

We understand that many species of our indigenous biodiversity are under threat. Many of the causes of this – are the result of inevitable outcomes of the general form and shape of modern human habitation in New Zealand. Agricultural land development and habitat loss, water abstraction, use of pesticides and other toxins, and other forms of pollution, tourism, and urban development are all key threats. As are the impacts of problematic introduced species, whose populations must be managed. Our Members are as keen as everybody else to see and continue to contribute strongly towards ecological protection of threatened biodiversity.

Key areas we see as requiring change are:

- Better management of:
 - agricultural land development, and intensification
 - water abstraction, in all of its forms
 - tourism development
 - urban developmentall of which contribute towards habitat degradation and loss
- Reduced use of pesticides, other toxins, and other forms of pollution (including indiscriminate aerial applications)

As is being seen globally - the greatest threat to our modern biodiversity is the poorly-managed impacts of increasing human habitation. This is evidenced by the 60% loss of wildlife the world has seen, since 1970 – and the 75% collapse in global insect biomass witnessed over the past 25-30 years.

4. We are Not the Root Cause of the Problem

Recreational Hunters often feel we are “blamed” for many of the problematic introduced species we have in New Zealand today. However, this cannot reasonably be considered to be the case.

For anyone whose New Zealand ancestry reaches back as far as the times in which introductions were made - those who most vehemently campaign for the eradication of these species are just as likely to have ancestors who assisted or supported such introductions, as anyone else.

Nobody alive today – can reasonably have any blame apportioned to them – more or less than any other. We were all born into a New Zealand where these species exist – we are all in the same boat – and we must all manage the resulting consequences, together. No matter which side of the fence we may be on.

For many, problematic introduced species are an emotive subject - about which they may apparently struggle to maintain consistent, rational thought.

Today, Recreational Hunters are generally the greatest “eco-warriors” we’ve got.

As will be illustrated further, in this Submission - virtually all of the efforts and expenditures of Recreational Hunters are ultimately (even if coincidentally) targeted at the protection of indigenous biodiversity. This is to very good effect – saving taxpayers hundreds of millions of dollars.

5. Overall Thoughts About the Draft National Policy Statement for Indigenous Biodiversity

We would agree - a good, robust, well-considered NPSIB that addresses Aotearoa New Zealand's national biodiversity – in the stated context of the interests and needs of all stakeholders – would indeed doubtlessly be an asset.

However, it is in the “addresses the needs of all stakeholders” where our opposition to the way in which the NPSIB is drafted arises.

New Zealand's Indigenous Biodiversity cannot be considered in isolation. Our modern biodiversity is an inter-related, inter-connected whole.

Many New Zealanders – including iwi / māori, pākehā and others alike – place great value on our modern biodiversity. This includes many introduced species – key amongst which are several regarded as every bit as important as indigenous species, in making modern Aotearoa New Zealand special.

Indeed, our biodiversity is central to our way of life across the country – especially evident, in rural areas.

As one goes around our mahinga kai, one sees that members of iwi / māori are positively disproportionately represented amongst hunter / gatherers. In pre-european times, moa were a major source of kai. The extinction of moa would have created a huge hole in the kai basket for iwi / māori. This hole was filled, with the European introduction of many new food species. Many iwi / māori continue to enjoy customary and traditional kai-gathering practices, centred around these introduced species. Going to the weigh-in for any of the many Hunting Competitions held around the country evidences this high level of participation – usually, with not an indigenous biodiversity species in sight.

Māori arrived with kurī (Polynesian dogs) and kiore (Polynesian rats). The first pigs were brought to New Zealand in 1769. Our ancestors brought other game animals. It was their very clear intention to make these animals part of the future landscape, here in modern New Zealand – in which they were successful – a fact that is celebrated by many, to this day. Many of our game animals enrich the lives of hundreds of thousands of New Zealanders – and are as legitimate a part of modern New Zealand, as many of our other introductions (eg modern agriculture, industry, and tourism).

The arrival of Rat was an incidental inevitability – such is the ability of this species to ride on the coat-tails of humanity, into the four corners of the globe. However, it is true, some of the deliberate introductions are not valued – and have proven to be serious mistakes on every level, with disastrous consequences for our native species. Mustelids (stoats, ferrets and weasels) are perhaps the best examples of these.

There is no way that we can ‘wind back the clock’. These introductions occurred – they cannot be undone - and we must now manage the consequences.

This is no bigger deal – than it is we must manage many other consequences of modern New Zealand. Modern agriculture, industry, and tourism – as well as sheer growth of the human population – are other examples of consequences requiring ongoing management.

Eradication of so-called pest species has previously been embarked upon – and has inevitably failed. Predator Free 2050 has been described (by a senior Manaaki Whenua Landcare Research science team leader) as “just a dream .. it could all become a nightmare, and there's a possibility of that happening”.

If we elevated pursuit of this as an ultimate goal - it would most likely bankrupt our country, before it could ever be achieved.

Whereas population management of introduced species is achievable – complete eradication is another matter “a 100 per cent kill and total eradication would cost \$200,000 to 500,000 a hectare .. we can't afford to do that on the mainland, even if we had the social licence to do that.”

Even taking the lower figure, this suggests a potential total cost of eradication of some 1.6 trillion dollars (jumping to 4 trillion, for the higher figure) – and this is for our 8 million hectares of Public Conservation Land alone. Both figures are greater than the current valuation for New Zealand's entire net wealth – obviously, completely unaffordable .

A self-disseminating tool for predator control could lower the cost, but it is doubtful this would be developed by 2050.

Those who most value New Zealand's introduced species – are those for whom they contribute most directly to recreational, cultural, social, mental, physical, spiritual and economic wellbeing. These people are best represented by those who recreationally participate in both the enjoyment, and active participation in positive population management and harvesting, of these species.

Recreational Hunters are to the fore, amongst these people. Most hunt with Firearms – and of the total approximately 248,000 Firearms Licence Holders, some 167,000 identify as Hunters. When you add suppliers and outfitters, and accompanying and participating friends, family and other supporters – including those who share in the consumption of meat harvested by Recreational Hunters – direct and indirect participants number considerably in excess of half-a-million Kiwi's – probably closer to three-quarters of a million.

These Firearms Licence Holders - who are Recreational Hunters - have a considerable investment in hunting introduced species, as a mainly recreational pastime. This investment includes firearms, vehicles, and other hunting equipment – and is measured into the billions (Recreational Hunters' firearms alone represent the greater part of a billion dollars, in value).

Recreational hunting generates considerable economic activity. Including operating and amortisation costs of firearms, ammunition, motor vehicles, ATV's, boats, aeroplane and helicopter transportation, accommodation, clothing, guiding fees, and other technology and hunting equipment. At least 50,000 Recreational Hunters pursue big game animals (deer, tahr, pigs and chamois) – spending in the order of \$200 million per annum. Total expenditure of all Recreational Hunters is in the order of \$250-\$350 million, per annum.

Recreational Hunters make (and have indeed always made, in living memory) the greatest contribution to towards protection of indigenous biodiversity, of any voluntary group – by a huge margin. Almost all quarry species pursued in numbers by Recreational Hunters are introduced (most native species are protected). Each and every year, some 150-200,000 big game animals (deer, tahr, pigs and chamois) are harvested – along with many millions of other introduced animals and birds (including possum, wallaby, goats, rabbits, hares, ducks, Canada geese, feral cats, mustelids, and others).

Recreational Hunters have no desire to participate in destruction of indigenous biodiversity – neither fauna, nor flora. Any slight downsides are voluminously offset by their positive contributions.

In fact, it could rightfully be argued that virtually all of the efforts and expenditures of Recreational Hunters are targeted at the protection of indigenous biodiversity.

6. Summary

We said at the outset, that certain species of our modern biodiversity are central to our way of life - as Recreational Hunters - across the country, here in Aotearoa New Zealand. Given the large

number of people and expenditures involved - and resulting ecological benefits - this fact simply cannot be reasonably ignored.

If our modern biodiversity is managed well, for the benefit of all New Zealanders - it is an ongoing source of great benefits.

Conversely, if our modern biodiversity is *not* managed well, for the benefit of all New Zealanders - it is a potential source of great conflict. And in this case – our natural environment will not be the winner. For nothing brings out the best – and worst – in humanity, than when the way of life is threatened for a significant group of people, who have the means to do something about it.

There are currently several threats to our way of life, simmering in the background. It is important that all stakeholders are properly invited to the table – so that biodiversity management strategies may be developed to properly address the legitimate interests and needs of *all* stakeholders – so that any potential, counter-productive sources of conflict are mitigated.

So, we do not oppose the drafting of a National Policy Statement for our National Biodiversity, per se. But we do oppose a National Policy Statement (as is this one) apparently clearly drafted to consider our Indigenous Biodiversity, in isolation.

We see considerable risk, in this.

We want to see a National Policy Statement on Indigenous Biodiversity that also reflects the value placed by many on introduced species, especially game species. In addition, we want to see proper recognition of the conservation role played by Recreational Hunters – both now, and in the future – to protect Indigenous Biodiversity.

This is why we must state our emphatic opposition to this National Policy Statement as currently drafted – and implore for it to be re-drafted, taking into account our modern biodiversity as a whole.

We respectfully suggest that failure to do so – may entrench the National Policy Statement for Indigenous Biodiversity as a potential, continual source of conflict between major stakeholder groups.

7. Verbal Submission

NZDA Rakaia always strongly seeks to avail itself of any opportunity to speak to it's Submissions.

NZDA Rakaia appoints as it's representative for the purposes of this Submission our Branch Submissions Officer, Stewart Hydes (refer contact details as per email to which this Submission is attached).

Yours Faithfully



(Stewart Hydes)
Submissions Officer

ON BEHALF OF:
Tom Beams – President
New Zealand Deerstalkers Association Rakaia Branch Inc.

Ashburton