

NZCA Consultation on Land NZCA comments below are in blue. These comments should be read together with the covering letter of 25 January 2011

Purpose

The land areas set out below are identified for consultation with the New Zealand Conservation Authority with respect to their inclusion, or not, in the non notified short term heli-hunting¹ permit for 2011.

These lands were either included in the applicant's original application and were not included in the non-notified short term permit for 2010, or they have been identified in new applications that have been lodged.

New lands

The areas of new land applied for include;

- National parks; Arthur's Pass, Westland, Aoraki Mt Cook, Mt Aspiring and Fiordland.
- Wilderness areas; Adams, Hooker/Landsborough, Olivine and Glaisnock.
- Recreational Hunting Areas; Lake Sumner.
- The St James Conservation Area
- The Wapiti Block in Fiordland National Park
- Aircraft free or "quiet" zones on conservation land under the draft Canterbury Air Access Guidelines.

With regard to the aircraft free or quiet zones under the draft Canterbury Air Access Guidelines, these are too small to identify on the map but if they are intended to be aircraft free, there would have to be compelling evidence of overwhelming benefit to make an exception for any non-essential aircraft dependent activity.

A map of these new lands is appended.

St James Conservation Area

The new land applied for covers all of the mid to higher altitude land within the St James Conservation Area. The valley flats and lower slopes are excluded.

St James Conservation Area: There has been no public consultation on the management of this area. The NZCA remains of the view that long term management should not be prejudiced by granting of concessions in advance of the formal statutory management planning process.

This is accessible, fairly easy country. It is ideal hunting terrain for relatively inexperienced foot hunters and is close to Christchurch. It should be kept for recreational foot hunters.

Lake Sumner RHA

The new land applied for covers all of the Lake Sumner Recreational Hunting Area (RHA)

Allowing aerial trophy hunting here would negate what the Authority had understood to be the intent of RHAs.

To authorise aerial trophy hunting in the RHA without formal consultation with other hunting interests is poor process and would be regarded as bad faith by the Department towards hunting interests generally, undermining recent effort and investment in encouraging recreational ground hunting and increasing its contribution towards the control of wild animals.

¹ The heli-hunting season is generally recognised to be from the beginning of March to mid July each year.

Arthur's Pass National Park

The new land in Arthurs Pass National Park that has been applied for is the north east corner of the park centred on the Poulter Range.

The Arthur's Pass National Park Management Plan does not provide for the use of aircraft to facilitate recreation. The provisions of the Plan should be adhered to.

The Authority understands that this part of the Park may include a heavily used area for foot hunters wanting to hunt Chamois.

Sibbald and Two Thumb ranges; Conservation land

The new land applied for covers the Sibbald and Two Thumb Ranges between the Godley, Macauley and Havelock Rivers.

Two Thumb is one of the priority areas for official tahr control (see covering letter).

This would be some of the most heavily used tahr hunting country for foot hunters. There is good 4WD access to much of this country and it is fairly easy terrain.

Aoraki/Mount Cook National Park

The three areas of additional land sought in the Aoraki/Mount Cook National Park are the Liebig and Malte Brun Ranges and a small part of the upper true right of the Godley River on the range immediately to the north of Rutherford Stream.

In a national park the expectation is that introduced animals will be exterminated. The Authority has made no determination to the contrary. Any aerial trophy hunting should be consistent with the provisions of the Park's Management Plan and subject to close and verifiable monitoring, performance assessment and review to ascertain effectiveness of its contribution to achieving the purposes of the WACA and NPA, including the extermination of introduced animals. This information will inform decision-making on new applications. Permits should be on an annual basis.

The Authority understands the Liebig Range to be another popular area for foot access. Some scenic helicopter landings occur on the Liebig Range. There could be air traffic effects.

Adams Wilderness Area

The new land applied for covers the whole of the Adams Wilderness Area.

See covering letter for the Authority's position on aircraft access to wilderness areas.

The provisions of the HTCP should be applied with regard to recreational hunting.

Westland *Tai Poutini* National Park

The new land applied for covers the all of the higher altitude land within the national park from the lower bush line up to the permanent snow fields; essentially all of the habitat likely to contain tahr and chamois and be suitable for heli-hunting.

A huge amount of planning, discussion and negotiation has gone into establishing the aircraft policies in Westland National Park. These should not be overridden for the benefit of a few people. Westland NP is identified in the HTCP as a priority area for official tahr control.

Hooker Landsborough Wilderness Area

The new land applied for covers the whole of the Hooker Landsborough Wilderness Area.

See covering letter for the Authority's position on aircraft access to wilderness areas.

The HTCP sets the regime for recreational hunting in the Hooker-Landsborough Wilderness Area. It allows for aircraft to land recreational and guided hunters for an annual up to twelve weeks period to run from April to July at the discretion of the Conservator, subject to close monitoring, performance assessment and review. The hunting opportunity is balloted. Any aerial trophy hunting needs to conform to the requirements of the HTCP.

Mt Aspiring National Park and the Olivine Wilderness Area

The new lands applied for cover the whole of the Mt Aspiring National park including the Olivine Wilderness Area but exclude the lower true left Dart River.

The operative 1994 Plan makes no provision for aircraft landings other than for essential management, research and SAR in the Olivine Wilderness Area. Where there are identified wild animal control problems, approval by the Conservator is required for private hunters to carry out organised animal control operations with the assistance of helicopters where necessary; such operations to be subject to close monitoring, performance assessment and review. Commercial hunters are requested to shoot any tahr, chamois, pig or/and goat they encounter in the Park and advise the nearest DOC office of this as soon as possible. If aerial trophy hunting has been occurring in the Olivine Wilderness Area it would appear to have been unauthorised. Such history is not therefore relevant.

Much of the Mt Aspiring National Park and all the Olivine are top priority under the HTCP for official control of tahr, being in the southern exclusion zone.

The notified draft reviewed Mount Aspiring national park management plan (March 2009) stated 'Concessions for aerial trophy hunting should not be granted within the Park'. With one exception, all the submissions on this policy supported it. The one exception was the submission of Wanaka Helicopters.

The reviewed draft plan has been referred to the Authority for approval with the Otago Conservation Board and the Department now having differing views on what the plan should provide with regard to aerial trophy hunting. The Authority is at the stage of exploring the reasoning behind those different views..

See also covering letter for the Authority's general view on aircraft access to wilderness areas.

Fiordland National Park and the Glaisnock Wilderness Area (part of the Wapiti block)

The new lands applied for cover all of the Wapiti Area including the Glaisnock Wilderness Area within Fiordland National Park.

The wild animal policies of the Fiordland National Park Management Plan (FNPMP) are based on conservation objectives. Specifically with regard to the control of wapiti section 4.5 of the plan provides:

Encourage community group initiatives for and participation in agreed animal control programmes. Support for any programmes will be dependent on a full assessment and will address the following matters (including, but not limited to):

- a) Demonstrating the programme will assist in achieving the biodiversity and biosecurity objectives of this plan;
- b) Demonstrating the programme will assist in conserving and/or restoring the ecosystems of indigenous species within Fiordland National Park;
- c) Demonstrating the programme does not adversely affect the achievement of implementations 1 and 2 of this section; and
- d) Demonstrating that the programme will be regularly reviewed to ensure the objectives of the programme are being achieved.
- e) If over time it is considered that the programme is not meeting the objectives of this management plan then the programme will be reassessed and if appropriate, it will cease.

The FNPMP was developed over a six year period involving extensive consultation with interested parties of which aircraft and hunting interests were the most vocal and most consulted. Their views were given extensive consideration. Any aerial trophy hunting within the Fiordland National Park would be inconsistent with the FNPMP provisions.

The plan does not provide for aerial trophy hunting in the Glaisnock Wilderness Area.

See also the Authority's covering letter for its views on aircraft in wilderness areas generally.

As with the RHA, to authorise aerial trophy hunting for wapiti in the Glaisnock Wilderness Area without formal and genuine consultation with other hunting interests would be poor process and would be regarded as bad faith by the Department towards hunting interests generally, undermining recent effort and investment in encouraging recreational ground hunting and increase its contribution towards the control of wild animals.

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