



New Zealand Plant Conservation Network
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Game Animal Council Bill - Submission by the New Zealand Plant Conservation Network

I write on behalf of the New Zealand Plant Conservation Network regarding the proposed Game Animal Council Bill. Our primary submission is that the Bill should not be enacted.

About the Network

The New Zealand Plant Conservation Network (NZPCN) is New Zealand's largest non-governmental organisation devoted to the protection of indigenous plants (including vascular plants, liverworts, mosses, lichens) and indigenous ecosystems and fungi.

The New Zealand Plant Conservation Network was established in 2003 with the vision that *'no indigenous species of plant will become extinct nor be placed at risk of extinction as a result of human action or indifference, and that the rich, diverse and unique plant life of New Zealand will be recognised, cherished and restored'*.

Network members collaborate to protect and restore New Zealand's indigenous plant life and their natural habitats and associated species. The Network was established to implement the Global Strategy for Plant Conservation (which New Zealand is signatory to) and the New Zealand Biodiversity Strategy.

The Network has more than 650 members worldwide and it manages the national flora information system (www.nzpcn.org.nz) which receives more than half a million visits annually and provides detailed information about all native and naturalised exotic vascular plants in New Zealand and their conservation needs.

The Network is a member of the Global Partnership for Plant Conservation. It coordinates the national threatened plant seed bank and has a memorandum of collaboration with the

Millennium Seed Bank in the UK. The Network also runs plant conservation training courses and delivers research grants through the David Given Threatened Plant Research Trust.

The impact of game animals

Game species such as deer, chamois, feral pigs and thar are serious pests that can cause significant damage to indigenous plant species and ecosystems in New Zealand. The Network knows from past research that recreational hunting of deer and thar do not reduce the numbers enough to protect indigenous ecosystems. Research done in 2006 by Landcare Research (Duncan et al 2006) showed that recreational hunting was the method that resulted in the slowest recovery of indigenous forest ecosystems when compared with other techniques.

The Network knows that forests are also disturbed by a range of other exotic animals, such as possums and rodents, and by natural events like storms and droughts but the impact of deer and other game animals can be severe especially on a number of key species including threatened species. Table 1 (see end of document) lists some selected species in the Network's national flora database that have been identified as threatened by deer, thar, chamois and pigs. This list includes 44 species including 40 nationally threatened plant species of which 9 are Nationally Critical, 6 are Nationally Endangered and 6 are Nationally Vulnerable. Game animals are also potential vectors for plant diseases such as kauri dieback disease or PTA and economically significant diseases such as bovine tuberculosis. According to Conservation International, New Zealand is one of the world's 30 biodiversity hot spots and 81% of our native vascular plants are endemic to New Zealand. New Zealand has close to 200 acutely threatened vascular plants. There has also been a 60% increase in the number of critically threatened vascular plant species in the last 5 years.

There is widespread national support for protecting New Zealand's unique biodiversity. In many parts of the country there is support for eradication of game pest species because of their potential to destroy indigenous species populations and ecosystems or cause the spread of bovine tuberculosis and other disease risks such as brucellosis, leptospirosis and toxoplasmosis. We understand that the New Zealand Conservation Authority has repeatedly warned against setting up of a Game Animal Council.

We note that there are no provisions in the draft Bill to monitor or tackle impacts and threats posed by herds of special interest and this could result in significant irreversible impacts on natural heritage assets especially native species and sensitive native plant communities.

New Zealand's natural heritage plays a significant economic role in delivering domestic and international tourism experiences, protecting water quality and quantity, protecting soils and providing shelter. The Bill as it stands would damage New Zealand's natural resources and the quality of New Zealanders recreational experiences. It would also detract from New Zealand's international image which would have subsequent impacts on the economy.

The Network opposes the Game Animal Council Bill and recommends that:

1. The Bill not be enacted.
2. Greater resourcing be given to landowners and agencies (government and non-government) involved in the protection and restoration of New Zealand's unique indigenous plant, animals and fungi to halt the ongoing declines.
3. The primary purpose of land administered by the Department of Conservation be the protection of New Zealand's unique and globally important natural and historic heritage including indigenous plants and animals and fungi. This is especially needed where conflicts occur between the desires of hunters and those of other recreational users and indigenous biodiversity itself including the threatened species identified in Table 1 (see end of document).
4. The Department of Conservation should retain statutory management and decision making functions with regard to game management. This was recommended by the Parliamentary Commissioner for the Environment in her report on evaluating the use of 1080 (PCE 2011). The Game Animal Council should not be given any of these functions. Furthermore the Game Animal Council's role should not have any direct influence over decisions made under the Biosecurity Act 1993.
5. Regional Pest Management Strategy provisions should take precedence at all times over any Game Animal Council provisions. Legislative change as proposed in the Bill must not impact upon the ability of local and regional government to manage pests including feral game animals.
6. The release of deer, chamois, feral pigs and thar should be prohibited and the Bill should be changed to indicate that no actions will be allowed to increase the range or density of game animals.
7. Herds of special interest should not be established on land with high biodiversity values such as nature reserves and scientific reserves or anywhere indigenous plant species or ecosystems occur that are vulnerable to the effects of feral game species.
8. Provision should be made to monitor or tackle impacts and threats posed by herds of special interest.
9. Money should not be diverted from the Department of Conservation to pay for the running of a Game Animal Council.

10. Clarification is needed that the Game Animal Council is to be given no greater influence, more than any other submitter, in any review process for regional pest management strategies.
11. The Minister for the Environment investigate ways to simplify and standardise the way 1080 and other poisons for pest mammal control are managed under the Resource Management Act and other relevant legislation.
12. If balanced advice is being sought on the future protection of New Zealand's economy, our tourism industry and our environment then we suggest reading the Parliamentary Commissioner's report on 1080. That calls for an increase in pest control and use of 1080 to improve the ecological resilience of New Zealand ecosystems. She noted that only one eighth of the conservation estate has any pest control at all, and without active management many of our iconic species are in danger of extinction.
13. If the Government does proceed with the establishment of a Game Animal Council then it should also establish a Nature Conservation Council to provide greater balance to the advice it receives relating to pest control and management of natural areas which are of global importance.

The Network would like to be heard in support of our submission.

Yours sincerely

Philippa Crisp (on behalf of the Network Council)
President of the New Zealand Plant Conservation Network

References:

PCE. 2011. Evaluating the use of 1080: Predators, poisons and silent forests.

Richard Duncan, Wendy Ruscoe, Sarah Richardson, Rob Allen. 2006. Consequences of deer control for Kaweka mountain beech forest dynamics. Landcare Research Contract Report: LC0607/021

Table 1: Native species threatened or potentially threatened by game species (deer, thar, chamois and pigs) in New Zealand

Species	Common_Name	Family	Threat status 2009	Threatened by
<i>Aciphylla stannensis</i>	Tin Range speargrass	Apiaceae	Naturally Uncommon	Potentially deer
<i>Alseuosmia macrophylla</i>	Toropapa, Karapapa	Alseuosmiaceae	Not Threatened	Ungulates
<i>Anisotome antipoda</i>	None Known	Apiaceae	Not threatened	Pigs
<i>Anisotome lyallii</i>	Lyalls carrot	Apiaceae	Naturally Uncommon	Deer
<i>Austroderia turbaria</i>	Chatham Island toetoe	Poaceae	Nationally Endangered	Pigs
<i>Brachyglottis huntii</i>	Rautini, Chatham Island Christmas tree	Asteraceae	Nationally Critical	Pigs
<i>Brachyglottis kirkii</i> var. <i>kirkii</i>	Kohurangi, Kirks daisy	Asteraceae	Declining	Deer
<i>Bulbinella talbotii</i>	Talbots onion, Gouland Downs onion	Asphodelaceae	Naturally Uncommon	Pigs
<i>Carex chathamica</i>	Chatham Sedge	Cyperaceae	Naturally Uncommon	Pigs
<i>Carmichaelia carmichaeliae</i>	pink broom	Fabaceae	Nationally Critical	Deer
<i>Celmisia adamsii</i> var. <i>adamsii</i>	Adams Daisy	Asteraceae	Naturally Uncommon	Deer
<i>Celmisia rigida</i>		Asteraceae	Naturally Uncommon	Deer
<i>Chionochloa lanea</i>	Stewart Island Snow Tussock	Poaceae	Naturally Uncommon	Deer
<i>Chionochloa spiralis</i>	Fiordland Snow Tussock, Spiral-leaved Snow Tussock	Poaceae	Naturally Uncommon	Deer

<i>Clematis marmoraria</i>	North-west Nelson Marble Clematis	Ranunculaceae	Nationally Vulnerable	Deer
<i>Coprosma spathulata</i> subsp. <i>hikuruana</i>	None Known	Rubiaceae	Naturally Uncommon	Pigs
<i>Dactylanthus taylorii</i>	Wood rose, pua o te reinga, flower of Hades	Balanophoraceae	Nationally Vulnerable	Pigs
<i>Dracophyllum longifolium</i> var. <i>septentrionale</i>	Ruahine Grass Tree	Ericaceae	Data Deficient	Deer
<i>Embergeria grandifolia</i>	Chatham Island sow thistle, Embergeria	Asteraceae	Recovering	Pigs
<i>Euphorbia glauca</i>	shore spurge, sea spurge, waiu-atua, sand milkweed	Euphorbiaceae	Declining	Pigs
<i>Hebe arganthera</i>	Fiordland Limestone Hebe	Plantaginaceae	Nationally endangered	Deer
<i>Hebe barkeri</i>	Barker's koromiko, Chatham Island tree hebe	Plantaginaceae	Nationally Critical	Pigs
<i>Hebe brevifolia</i>	Hebe	Plantaginaceae	Naturally Uncommon	Pigs
<i>Hebe societatis</i>	Hebe	Plantaginaceae	Nationally Critical	Pigs
<i>Isolepis basilaris</i>	pygmy clubrush	Cyperaceae	Nationally endangered	Pigs
<i>Libertia cranwelliae</i>	Cranwells Iris, Cranwells Mikoikoi	Iridaceae	Nationally Critical	Deer
<i>Mida salicifolia</i>	Willow-leaved maire, Maire Taike	Nanodeaceae	Not threatened	Deer
<i>Myosotidium hortensium</i>	Chatham Island Forget-me-not, Kopakopa, Kopukapuka	Boraginaceae	Nationally Vulnerable	Pigs

<i>Myosotis laeta</i>	Red Hills Forget-me-not	Boraginaceae	Nationally Critical	Potentially by deer
<i>Myosotis petiolata</i> var. <i>pansa</i>	Forget-me-not	Boraginaceae	Nationally endangered	Deer
<i>Myrsine umbricola</i>	Tararua matipo	Primulaceae	Nationally Critical	Deer
<i>Olearia chathamica</i>	keketerehe	Asteraceae	Declining	Pigs
<i>Ophioglossum petiolatum</i>	Stalked adder's tongue fern	Ophioglossaceae	Nationally Critical	Pigs
<i>Pittosporum dallii</i>	Dalls Pittosporum/kohuhu	Pittosporaceae	Nationally Vulnerable	Deer
<i>Pittosporum patulum</i>	Pitpat	Pittosporaceae	Nationally Endangered	Ungulates
<i>Pittosporum turneri</i>	Turners kohuhu, tent pole tree	Pittosporaceae	Nationally Vulnerable	Deer
<i>Plagianthus regius</i> subsp. <i>chathamicus</i>	Chatham Island ribbonwood	Malvaceae	Recovering	Pigs
<i>Pseudopanax ferox</i>	Fierce lancewood	Araliaceae	Naturally Uncommon	Deer
<i>Pterostylis micromega</i>	Swamp Greenhood	Orchidaceae	Nationally Critical	Deer and pigs
<i>Pterostylis silvicultrix</i>	tutukiwi, Chatham Island greenhood	Orchidaceae	Naturally Uncommon	Pigs
<i>Ranunculus acraeus</i>	None Known	Ranunculaceae	Nationally Endangered	Thar and chamois
<i>Ranunculus godleyanus</i>	Yellow alpine buttercup	Ranunculaceae	Recovering	Thar and chamois
<i>Ranunculus grahamii</i>	Grahams buttercup	Ranunculaceae	Naturally Uncommon	Thar and chamois
<i>Rorippa divaricata</i>	New Zealand water cress, Matangaoa	Brassicaceae	Nationally Vulnerable	Pigs