



ENVIRONMENT AND CONSERVATION ORGANISATIONS OF NZ INC.

Level 2, 126 Vivian St, Wellington, New Zealand
PO Box 11-057, Wellington
Email: eco@eco.org.nz Website: www.eco.org.nz
Phone/Fax 64-4-385-7545

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Department of Conservation *Te Papa Atawhai*,
National Office, PO Box 10-420,
Wellington 6143

Attn: Marie Long, Senior Planner, Planning Unit, Policy Group

Submission on Conservation Management Strategy – Gazetted Wilderness Areas

1.0 Introduction

The Environment and Conservation Organisations of NZ (ECO) is the national alliance of 60 groups with a concern for the environment. ECO has been involved in issues of conservation and resource management since its formation nearly 40 years ago.

This submission has been prepared by members of ECO Executive and is in line with ECO Policy that was developed in consultation with ECO member bodies and endorsed by our AGM.

ECO welcomes the opportunity to comment on the values of gazetted wilderness areas.

2.0 “Some key questions”:

- 1) ECO supports, with restrictions, the use of aerial access for management purposes into wilderness areas.
- 2) ECO supports, with restrictions, the use of aircraft for wild animal control purposes.
- 3) ECO does not support the granting of concessions in gazetted wilderness areas.

3.0 Wilderness Areas:

- 4) ECO supports existing statutory acknowledgement of the importance of wilderness areas.
- 5) ECO considers that, while wilderness is not explicitly defined in legislation, the term implies the very highest level of an unmodified natural state of indigenous landforms, ecosystems, and of sight and sound (eg peace and quiet). In addition wilderness areas are

included land categories protected by the 4th Schedule of the Crown Minerals Act.

- 6) In general it is understood that wilderness areas are without huts or tracks or other human structures. The only footprint left is that made by trampers, climbers or skiers.
- 7) ECO considers that, for any activity to be approved by the Department, there must be a clearly identifiable need for it related to the values for which that area was established as a wilderness area, and the activity must fulfil that need.

4.0 Gazetted Wilderness Areas:

- 8) ECO notes that gazetted wilderness areas comprise just 6% of public conservation lands and waters, and asserts that their minor proportion is indicative of their high intrinsic natural values.

5.0 Aerial access into wilderness areas for management purposes:

- 9) ECO supports aerial access into wilderness areas for animal control purposes.
- 10) ECO does not support the use of recreational or commercial hunting for animal control purposes.
- 11) ECO submits that there is evidence that such hunting is ineffective for animal control – see *“Comparing cost-effectiveness of commercial harvesting, state-funded culling, and recreational deer hunting in New Zealand”*, G.Nugent & D Choquenot, Wildlife Society Bulletin 2004.

6.0 Questions:

6.1 Question 1:

- 12) ECO submits that aerial access for management purposes in gazetted wilderness areas should be subject to the following criteria:
 - Can the purpose of the proposed air access be fulfilled in any other way?
 - Will the proposed air access provide enduring scientific or ecological benefit to the values of the wilderness area?
 - Will the enduring benefit exceed the detrimental effects of the air access to the wilderness area?

6.2 Question 2:

- 13) ECO submits that the above criteria, interpreted for wild animal control would produce the following criteria to be included in a CMS to provide guidance for considering the appropriateness of aerially assisted wild animal control in wilderness areas:
 - Is the proposal likely to be the most effective means of feral animal control, in terms of animals killed per aircraft hour?
 - For what period of time will the number of feral animals killed or removed have an impact on the overall population within the wilderness area?
 - With what frequency will the exercise need to be repeated?
 - Will the diminished detrimental effects of the number of feral animals to be killed or removed outweigh the detrimental effects of the air access to the wilderness area?

6.3 Question 3:

18) ECO considers that concession activities are incompatible with the values of wilderness areas, because wilderness areas provide the opportunity for recreation in extensive natural settings with diverse topography and very high levels of natural character. They are places in which people must be self-reliant and travel entirely on nature's terms, being confident that they are unlikely to encounter other users or find evidence of others having been there.

6.4 Question 4:

19) Because ECO considers that concession activities should not be allowed in gazetted wilderness areas, we submit that there are no conditions under which any concession activity should be allowed.

7.0 Conclusion:

ECO attaches the very highest importance to maintaining wilderness areas in their unmodified state, and welcomes this opportunity to comment on their management.

Yours sincerely,

Fred Murray
For the ECO Executive