



ENVIRONMENT AND CONSERVATION ORGANISATIONS OF NZ INC.

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September 13th, 2013

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Submission on draft Canterbury Conservation Management Strategy

INTRODUCTION:

Environment and Conservation Organisations of NZ Inc (ECO) is an umbrella for over 50 New Zealand organisations with a shared concern for the environment and conservation. ECO membership includes New Zealand branches of large international groups such as Greenpeace and Friends of the Earth, national groups including National Council of Women, as well as small local groups such as Guardians of Pauatahanui Inlet and Save the Otago Peninsula, and issue-oriented groups like the Yellow-eyed Penguin Trust.

During the more than forty years that ECO has been established, ECO has campaigned to protect habitats and species including native forests, lakes and rivers and marine areas and other ecosystems. We have since the 1970's championed sustainable energy policies and are active in opposition to climate damaging policies.

ECO continues active engagement in environmental campaigns on fisheries and marine management both nationally and in the high seas, and environmental management. ECO is engaged in New Zealand's policy on marine and terrestrial resource governance and presses for law and policy to safeguard and enhance marine and land-based biodiversity and oceans management.

Since 1982 ECO has been active on environmental protection in Antarctica, including the defeat of the Antarctic Minerals Regime and the adoption of

conservation measures, the Protocol to the Antarctic Treaty on Environmental Protection, and is pressing with colleague organisations for the protection of a large network of protected areas in the Southern Ocean, including the Ross Sea.

Over many years ECO has also worked to promote the open society in New Zealand and internationally, and has pressed for public access to information, open government and due process.

We have pressed for the adoption of the ideas underpinning sustainable development, including strong sustainability, recognition of social and natural capital, social justice and other ethical underpinnings of sustainability. We have worked on the various Rio and other sustainable development conferences.

We are an active member of the international community, via IUCN, the South Pacific Regional Fisheries Management Organisation, the Antarctic Treaty System, the UN climate change reporting processes and various other regional and international meetings and processes.

ECO expresses its appreciation of this opportunity to comment on the Conservation Management Strategy.

ECO strongly supports the definition of conservation as defined under section 2 of the Act as *“the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations”*

CONSERVATION MANAGEMENT STRATEGY:

- 1) ECO has grave concerns that the draft CMS appears to foster an increase, under the guise of “recreation”, of commercial tourism opportunities on conservation land, and a parallel increase, again under the guise of “recreation” in activities broadly involving the use of mechanical devices both in order to increase visitor numbers to conservation land.
- 2) ECO’s concerns are that such focus on visitor numbers is not matched by any concern that visitors appreciate the natural and historic resources being used, and that their recreational enjoyment can be in conflict with safeguarding those resources for future generations.

1.5.1 DIVERSITY OF OUR NATURAL HERITAGE IS MAINTAINED AND RESTORED:

OBJECTIVES:

- 3) ECO is concerned that the frequent use of the word “contribute” and the phrase “work with others” indicate that forming alliances rather than

protection of natural and historic resources is becoming the Department's focus.

MILESTONES - OUTPUTS:

- 4) ECO is concerned that the draft CMS outlines various outputs for completion by specific dates (2 by 2017, 5 by 2019, and 12 by 2024). This increasing output at increasing future distance appears similar to Government's gradually increasing, but at increasing future distance, targets for reduced carbon emissions.
- 5) ECO is concerned that these outputs sound sincere and comprehensive but are unlikely to eventuate.
- 6) ECO is further concerned that these outputs are, in any case, invariably reports and do not in themselves constitute a guarantee of field work completion towards the safeguarding of the specified resources.

1.5.2 HISTORY IS PROTECTED AND BROUGHT TO LIFE:

MILESTONES - OUTPUTS:

- 7) Again, ECO is concerned that outputs are measured in terms of reports and not on completion of field work safeguarding resources, and at the increasing targets further into the future.

1.5.3 MORE PEOPLE PARTICIPATE IN RECREATION:

- 8) ECO supports the concept of "*more people gain health benefits and an improved sense of well being*", but asserts that since recreation is a subsidiary of conservation, that those benefits flow from an active appreciation of the natural and historic resources they use and that the objective really should be worded as "*more people appreciate the value of recreation on conservation land*"

MILESTONES - OUTPUTS:

- 9) ECO considers that the draft outcomes are incorrect in focusing on numbers recreating.

1.5.4 MORE PEOPLE ENGAGE WITH CONSERVATION AND VALUE ITS BENEFITS:

- 10) ECO considers that the previous section (1.5.3) should be incorporated into this section in order to establish the hierarchy of the value of conserving the natural and historic resources over the recreation which is dependent on their conservation.

1.5.5 CONSERVATION GAINS FROM MORE BUSINESS PARTNERSHIPS:

- 11) ECO supports the establishment of new business partnerships provided they complement the natural or historic values of the particular places or localities.
- 12) ECO does not support the inclusion of ski fields as potential new business partnerships. Climate change will turn the existing ski fields into a sunset industry and ECO consequently considers that any new ski field could only be envisaged under the most extraordinary circumstances, certainly not warranting inclusion in the CMS.

Part Two – Places:

2.1 National Parks Place

AORAKI/MOUNT COOK NP:

- 13) ECO supports the outcome that the Park is “*preserved in perpetuity in its natural state as far as possible*”, but is concerned that the subsequent wording describes the integrated manner in which the various commercial operators are managed rather than emphasising either the perpetuity or the preservation of the Park’s natural state.

ARTHUR’S PASS NP:

- 14) ECO supports again the preservation in perpetuity in its natural state.

POLICIES:

- 15) ECO supports policy 2.1.4 to undertake a S8 investigation in relation to additions to the Park, and policy 2.1.5 seeking an extension of the World Heritage Area to include any addition to the Park.

2.2 Braided Rivers/Ki Uta Ki Tai Place

- 16) ECO supports this inclusion as a place because of their focus for the Department’s advocacy and community relations work.

Recreation:

- 17) ECO supports the comments that recreational activities in riverbeds can have negative impacts on fragile vegetation or disrupt nesting birds and other fauna.
- 18) ECO considers that such negative impacts are often not unintended and that the word “*unintended*” should be deleted.

Outcomes:

- 19) ECO notes the inclusion of “*Activities in braided riverbeds, including vehicle use, are managed to avoid adverse effects on ecosystems and species*”
- 20) ECO submits the inclusion is meaningless in the absence of any management of vehicle use off formed roads and often on sensitive surfaces/ecosystems.

- 21) ECO submits that an essential step towards effective management of vehicle use off -road is the establishments of regulations governing such use and covered by the Summary Offences Act.

2.4 Coastal Land and Marine Place

- 22) ECO supports the inclusion of Table 3 restricting vehicle use and again submits the inclusion is meaningless in the absence of any management of vehicle use.
- 23) ECO submits that an essential step towards effective management of vehicle use off -road is the establishment of regulations governing such use and covered by the Summary Offences Act.

2.5 Southern Conservation Parks Place:

- 24) ECO is concerned at the impacts of down-hill mountain-biking in Craigieburn.
- 25) ECO submits that recreation on conservation land needs to be compatible with the natural values of the area and that the impacts of down-hill do not comply with conservation as per point 6.
- 26) ECO submits that an essential step towards effective management of such use is the establishments of regulations governing such use and covered by the Summary Offences Act.

2.6 Northern High Country Place:

- 27) ECO notes that the collection of unauthorized private huts are in the process of being removed under the Loch Katrine Recreation Reserve Management Plan (1999) and has concerns that this removal process is taking an unduly long time.
- 28) ECO is concerned that the concessionaire-provided publicly available huts are in effect private and requests that the booking system for these should be subjected to careful review to ascertain whether they are in fact all available for public use or if they are effectively private huts.
- 29) ECO submits that the further construction of new huts should not proceed until the removal of the old, and the review of the booking system are both completed.
- 30) ECO considers that four-wheel drive vehicle access within the St James conservation area, while confined to summer months, is inadequately managed when track conditions are wet.
- 31) ECO submits that the state of the track in both the Edwards and Maling pass routes has deteriorated markedly since 2009, primarily due to heavy use when the tracks are not dry.
- 32) ECO submits that vehicle use should be confined to specified days/weekends only during summer months, and subject to cancellation if wet.
- 33) ECO submits that an essential step towards effective management of such use is the establishments of regulations governing such use and covered by the Summary Offences Act.

2.8 Foothills Forest Place:

- 34) ECO considers the use of mountain bikes on some routes, especially the Mount Grey Track, is creating substantial erosion damage to tracks which have survived many years of use by people walking.
- 35) ECO considers that mountain bike use when tracks are wet can be more damaging than walking use because of the “endless drain” effect of the wheel ruts.
- 36) ECO considers that instead of a blanket assumption that mountain bike use is acceptable, it must be managed for appropriate track conditions.
- 37) ECO submits that an essential step towards effective management of such use is the establishment of regulations governing such use and covered by the Summary Offences Act.

Part Three - Specific policy requirements for Canterbury

Authorisations (general)

- 38) ECO supports that where authorised activity is beginning to reach the environmental and/or social carrying capacity of a place, the Department may limit the amount of activity that can occur in that place.

Vehicles:

Motorised vehicles:

- 39) ECO considers that the “*care codes*” developed for various forms of vehicle use are less environmental care codes than motor-vehicle use promotional codes, since none of these codes suggest that a vehicle user consider leaving a vehicle behind and walking.
- 40) ECO submits that vehicles should be excluded unless they can be effectively managed.
- 41) ECO submits that in many places, vehicle use restricted as in the Clarence Reserve Conservation Area, to limited specified dates, and subject to suitable weather, is more easily managed than presently appears to be the case in the St James CA.
- 42) ECO submits that an essential step towards effective management of such use is the establishment of regulations governing such use and covered by the Summary Offences Act.

Mountain bikes (non motorised)

- 43) ECO considers that management caution is indeed needed where the means exist (ski-field roads, helicopters, gondola/ski lifts) to easily lift thrill seekers to higher altitudes.
- 44) ECO considers that mountain biking down skifield slopes that are protected in winter by snow is incompatible with the natural values of conservation land.

CONCLUSION:

- 45) ECO submits that a focus on increasing the numbers using conservation land does not fulfill the Department's obligations under the Act.
- 46) ECO acknowledges the financial constraints on the Department at this time, and that increasing public appreciation of the values of conservation is prudent.
- 47) ECO submits that increasing use of mechanical devices for recreation must be restricted, on conservation land, to areas and places where it is allowed..
- 48) ECO submits that an essential step towards effective management of such use is the establishment of regulations governing such use and covered by the Summary Offences Act.
- 49) ECO expresses its appreciation for this opportunity to comment on the draft Canterbury Conservation Management Strategy.
- 50) ECO requests the opportunity, in the event of a hearing of submissions, to have a representative speak to this submission.