



**ENVIRONMENT AND CONSERVATION ORGANISATIONS OF NZ INC.**

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**Submission on draft Southland 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.

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. 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.

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.

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.

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.

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 Three - Specific policy requirements for Southland**

#### **Authorisations (general)**

13. ECO supports that where an 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:**

14. ECO submits that vehicles should be excluded unless they can be effectively managed.
15. 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 Mavora Lakes CA.
16. 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.

##### **Power-assisted cycles:**

17. ECO considers that power assisted cycles should be regarded as motor vehicles, and their use restricted accordingly.
18. ECO considers that their use as an alternative mountain bike, for example to allow a person to climb a hill that person could not climb on a mountain bike, is not sufficient cause to allow motorised vehicle intrusion further in to conservation land.
19. ECO submits that no definition of power assisted cycles should be included in the CMS.

##### **Mountain bikes (non motorised)**

20. 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.
21. ECO considers that mountain biking down skifield slopes that are protected in winter by snow is incompatible with the natural values of conservation land.

##### **Rail vehicles:**

22. ECO considers that rail vehicles need a railway line on which to run.
23. ECO considers that there are no circumstances under which the presence of a railway line and associated infrastructure complies with the Department's obligations under the Act.
24. ECO submits that no definition of rail vehicles should be included in the CMS.

## CONCLUSION:

25. ECO submits that a focus on increasing the numbers using conservation land does not fulfill the Department's obligations under the Act.
26. ECO acknowledges the financial constraints on the Department at this time, and that increasing public appreciation of the values of conservation is prudent.
27. ECO submits that increasing use of mechanical devices for recreation must be restricted, on conservation land, to areas and places where it is allowed.
28. 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.
29. ECO expresses its appreciation for this opportunity to comment on the draft Southland Conservation Management Strategy.
30. ECO requests the opportunity, in the event of a hearing of submissions, to have a representative speak to this submission.