



Federated Mountain Clubs of NZ (Inc)

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Department of Conservation
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Dear Sir/Madam

Gazetted Wilderness Areas

Thank you for the opportunity to comment on issues around gazetted wilderness areas.

Federated Mountain Clubs represents some 15,000 members of tramping, mountaineering, climbing and other outdoor recreation clubs throughout NZ, and indirectly represents the interests and concerns of many thousands of private individuals who also enjoy recreation in the back country. It is fair to say that New Zealand's current network of gazetted wilderness areas and the Wilderness Policy can trace their origins directly FMC's 1981 Wilderness Conference. It follows that Federated Mountain Clubs has a deep and abiding interest in the creation and preservation of wilderness areas. Its members would be one of the major user groups of these areas. Perhaps more importantly, wilderness areas are important to people who may not have and may never travel to them. To quote former Minister of Conservation Sandra Lee, "setting aside wilderness [is] an act of humility by society and recognises that some places should be left where nature reigns supreme."

We note that the Wilderness Policy, produced in 1985 by the Wilderness Advisory Group for the New Zealand Forest Service and the Department of Lands and Survey remains in force. Our responses to your questions are built on the framework of the Wilderness Policy.

In response to your questions:

What criteria should be included in a CMS to provide guidance for managing aerial access for management activities in gazetted wilderness areas?

We do not object to aerial access for genuine conservation management activities. As there are no facilities in these areas, we understand that the only management activities are likely to be biodiversity and pest management activities. We acknowledge that these are important. We expect that such flights would be rare.

However, we oppose aircraft access for commercial or recreational hunting under the guise of wild animal control. Pest management is an operation dedicated to destroying the greatest number of pests and reducing breeding populations as much as possible, balanced against maintaining wilderness values. We do not consider that the Easter trial in Tasman Wilderness met these criteria. 12 return flights and 106 hunter-days only netted 46 deer and 2 goats.

Genuine management activities should be scheduled, wherever possible, to minimise user conflict by minimising aircraft use at times and in places where recreational users are likely to be encountered. Work should be planned around minimising the number of flights. Flight routes should be planned to try to avoid other users. have no specific objection to aerial access for management activities.

What criteria should be included in a CMS that provides guidance for considering the appropriateness of aerially assisted wild animal control operations in gazetted wilderness areas?

This question is largely covered in our previous response. Aerially assisted wild animal control operations must be those that are genuinely focused on significantly reducing pest animal numbers in the target area. Air access for hunting should not be approved unless the applicant can show that it will significantly reduce pest numbers in the target area.

It is unlikely that anything other than a targeted extermination operation will meet these criteria.

We are implacably opposed to aerial trophy hunting in any area, but especially in wilderness areas and national parks. It cannot be shown that this activity produces any biodiversity benefit. In fact, it incentivises herd maintenance by operators. It is one of the most destructive activities in its effect on natural quiet, and on the key wilderness value of being away from man-made influences.

It is our firm view that the Department's current sanctioning of this activity by temporary concessions to operators as if they were genuine wild animal recovery control operations falls outside the purpose of the Wild Animal Control Act. Such flights cannot be shown to have a measurable effect in reducing the numbers of pest animals.

Do you think concessions should be allowed in gazetted wilderness areas? Please explain.

Our views on various forms of aircraft-assisted hunting are stated above. Clearly, no other forms of mechanised access should be allowed in a wilderness area.

Our view on other recreational concessions i.e. guiding is that the occurrence of even very low levels of guiding creates a "trade route" effect, with advertising of trips; the potential for timetabled trips (already one guidebook warns trampers about the presence of guided groups on specific days at specific sites in some National Parks); and pressure to modify, mark or bolt routes used regularly (even if not permitted). While guides in some cases would be no different to an experienced tramp leading a group of less experienced friends into the area, it is not uncommon for guides to lead clients into areas that they simply could not get to under their own steam. These people cannot be said to be encountering nature on its own terms.

The Recreational Opportunity Spectrum is a management tool which is widely used and recognised as valid. FMC supports its use. It is clear that recreation in a wilderness area should be firmly placed at one end of the spectrum. Guiding is an option on most other parts public conservation land, and there is no need or justification for allowing commercial operations to spread to wilderness areas. We note that this position was supported by the NZ Conservation Authority when it approved the Mount Aspiring National Park Management Plan.

The one exception would be on specific sites where a small intrusion beyond the boundary of a wilderness area cannot practically be avoided and where the boundary cannot practically be redrawn. The

only example we are aware of is the overlaying of a specific Mt Aspiring climbing region for management purposes over the remote/wilderness boundary, which we described in our submission on the management plan as “inspired”. It enables site-specific policies to be implemented without any expectation that they will overflow into the remainder of either zone.

Further thoughts on Wilderness

As the Department is consulting on specific matters pertaining to wilderness, we think it is timely for it to consider wider issues on promoting and enhancing wilderness values. In particular, we note that the management plans for Fiordland and Rakiura National Parks include a requirement for the Department to commence a process that could lead to the gazettal of Poteriteri (South West-Cameron) and Pegasus wilderness areas, yet we have not seen any indication of process on these areas.

Federated Mountain Clubs remains keen to be involved in any work the Department is doing on planning for the management of wilderness areas.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Phil Glasson', written on a light-colored rectangular background.

Phil Glasson
Secretary