



Federated Mountain Clubs of NZ

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Submission on proposed Resource Legislation Amendment Bill

1. This is a submission on behalf of the Federated Mountain Clubs of New Zealand Incorporated. FMC is the national body representing approximately 20,000 trampers and mountaineers. FMC was formed in 1931.
2. FMC is broadly supportive of the proposed changes, particularly the government's desire to avoid changes to section 5, 6, and 7 of the Act. This is pragmatic and sensible, as changes to these sections would have relitigated nearly 30 years of case law, at considerable cost and uncertainty.
3. FMC raises a general concern that issues with urban planning are contaminating the rest of the RMA, and risking public involvement in matters on a catchment or wider-scale. It may be better to treat urban planning within a separate Act.
4. However, FMC has significant concerns with the following components of the Bill:
 - a. The proposed amendments to the Reserves Act 1977 in section 14A and 14B to allow for exchanges of reserve land, including recreation reserves. The process set out for these land swaps not provide any independence or certainty that ecological or recreational values will be considered as part of a land swap. At the minimum, there needs to be a right of appeal to the Environment Court on this matter.
 - b. The proposed amendments to the Conservation Act 1987 which deal with concessions processing. For significant concessions, which affect FMC clubs and members, a processing time of 20 working days is simply not appropriate for volunteers to gather information and provide an appropriate response to proposals. The truncated time period risks inadequate information being used in any decision.
 - c. The proposed collaborative planning process does not provide any further rights for individuals or groups who may not choose to be involved in such a process. FMC runs on volunteers, who may not have the time or resources to be involved in such a process. As such, FMC cannot support the proposed

collaborative planning process as contained in the new proposed section 80A and 80B of the Act.

5. FMC is considering solutions to the above challenges, and wishes to raise these during our oral submission to the select committee.
6. FMC supports the submission of the Environmental Defence Society, and requests that the relief sought by this group is given considerable weighting.
7. FMC wishes to be heard to speak in support of this submission.

Yours faithfully,

Peter Wilson
Executive member
Federated Mountain Clubs of New Zealand Incorporated