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Al Morrison
Director-General
Department of Conservation
PO Box 10420
Wellington 6143

Copies to: Hon Kate Wilkinson, Minister of Conservation
Mike Cuddihy, Canterbury Conservator

Dear Al,

The Department of Conservation's management of heli-hunting

Forest & Bird would like to endorse the position of the New Zealand Conservation Authority on heli-hunting. The Authority is critical of the Department's current approach in a letter dated 15 November 2010, and we agree with its concerns.

The practice of heli-hunting – where a fee-paying hunter is guided to a trophy animal by helicopter – should be recognised as primarily a **commercial activity for private benefit** and managed as such. It is not a conservation management activity for the public good.

Forest & Bird is concerned at the Department's approach, which seeks to justify extensive heli-hunting on the basis that it is a wild animal control activity. Like the NZCA, we object to such interpretations of the activity. Another argument, which Mike Cuddihy posed to the DOC-NGO forum, is that heli-hunting is no different to flying a recreational hunter in and out of a location for a period of ground-based hunting. We disagree: hunting by helicopter involves machines in the air for longer periods than access flights and so is more intrusive and less able to be controlled.

Heli-hunting has very low public benefits through killing pest animals, with only individual trophy animals being taken. The activity does not provide "concerted action against the damaging effects of wild animals", the purpose of the Wild Animal Control Act. Indeed the practice may well serve to promote the opposite by deterring other hunting activity and thereby reducing overall animal control.

From a conservation management point of view, the practice has a significant impact on natural and recreational values. Public conservation lands being targeted for heli-hunting include wilderness areas, national parks and other highly-valued conservation and recreation areas, including areas with fragile biodiversity. Many people – New Zealanders and tourists – access such remote areas for natural quiet, appreciation of biodiversity and recreational activity, including ground hunting. Heli-hunting is, in general, not compatible with these values and public uses. Air access to remote areas

for heli-hunting must be controlled like other commercial activities so noise and disturbance are minimised and the intrinsic values of New Zealand's wild places are preserved.

We recognise that heli-hunting has commercial benefits to helicopter operators and hunting guides, and that the Department is under strong pressure to liberalise heli-hunting access. We also recognise that the current legal situation is complex. However, Forest & Bird stands with the New Zealand Conservation Authority, and concerned recreational hunters and trampers, in maintaining that heli-hunting should be managed as a **commercial activity for private benefit** (that will be inappropriate in many places); not as a **conservation management activity** that is given easy access to public conservation lands. Like the Authority, we are very concerned at this misinterpretation of legislative intent by the Department and the precedent that this sets.

We agree with the Authority that a precautionary approach should be taken to the issuing of all heli-hunting concessions in the short-term. That includes determining that heli-hunting is inappropriate in some areas. Forest & Bird is firmly opposed to any heli-hunting in wilderness areas and national parks. The activity is incompatible with the purpose of their land protection status.

Longer term, it is essential to update relevant statutory management plans and strategies to restrict and control heli-hunting for what it is, a commercial activity for private benefit that has significant public impacts on conservation and recreation values. If a law change is required to enable this, then this should be pursued.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mike Britton', written in a cursive style.

Mike Britton
General Manager
Royal Forest & Bird Protection Society of New Zealand Inc.



Department of Conservation
Te Papa Atawhai

25 January 2011

Mike Britton
Forest and Bird
P.O. Box 631
WELLINGTON 6140

Dear Mike

Heli-Hunting

Thank you for your recent letter concerning heli-hunting. I can provide you with further details as background to the way that my department is considering applications for this activity.

When the department re-issued the national concessions for wild animal recovery and live capture in December 2009 an opportunity presented itself to separate out the activity of heli-hunting. Separating out the activity was warranted in the department's view because heli-hunting has different effects from those of wild animal recovery and live capture. Previously helicopter operators had undertaken heli-hunting activities under the ambit of the WARO concessions. As a result of separating heli-hunting out, operators who wished to undertake it in the future were advised to apply for a new concession that was specific to this activity.

The department has now received a number of heli-hunting concession applications and is currently processing them. While this is happening the industry will be given short-term non-notified concessions to provide for the continuity of an activity that has taken place, on the claims of the industry, for some 20 years.

Heli-hunting has generated considerable interest on a wide range of fronts. These include animal welfare, hunter ethics, the use of aircraft, CMS and national park management planning, wilderness area values, competition for trophies, adverse effects on other recreationalists and natural quiet. The situation we now find is that consideration of these concession applications for heli-hunting is taking place against a paucity of guidance in the legislation, general policies, CMSs and national park management plans. Part of the reason for this situation is that the industry previously relied on their wild animal recovery permits and did not engage in policy and planning processes. In addition no-one else previously identified heli-hunting as a significant issue. The current legal and planning situation is complex but the Department and the Minister are required to process and make decisions that take that complexity into account.

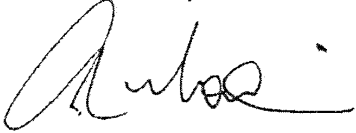
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Whether helihunting is a commercial activity for private benefit or a conservation management benefit or both it cannot occur on public conservation land without the Minister of Conservation's authorisation. The Department has a responsibility to process any applications it receives. The Department's approach does not seek to justify extensive helihunting on the basis that it is a wild animal control activity. The Minister, in making decisions on whether or not to allow helihunting to occur, will be guided by the statutory tests in the legislation.

I am also aware that wild animals such as tahr and chamois are not in any state of natural equilibrium in our mountain lands. This to me highlights an opportunity for co-operation and partnership between the department and recreational and commercial hunters in order to achieve better control of these animals. As a ball park estimate the department expends some \$200-300,000 annually killing to waste tahr and chamois. There has to be a better way to control these wild animals and provide recreation and commercial business opportunities so that the department can re-direct some of this funding to high priority conservation work.

From the department's perspective as a land manager we recognise the tension between recreation and commercial activities that may deliver a benefit for one aspect of nature conservation such as ecosystem health, but which at the same time may have an adverse effect on other values such as natural quiet and wilderness values.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Alastair Morrison', written in a cursive style.

Alastair Morrison
Director-General
Department of Conservation