



**Closing date for submission Monday, 30 June 2025**

**Email submission to:** [biodiversitystrategy@doc.govt.nz](mailto:biodiversitystrategy@doc.govt.nz)

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A handwritten signature in black ink that reads 'Richie Cosgrove'.

On behalf of

Richie Cosgrove CEO

New Zealand Fish and Game Council

*Statutory managers of freshwater sports fish, game birds and their habitats.*

**New Zealand Council**

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## **1.0 Submission summary**

1.1 Fish and Game (F&G) would like to be involved as a contributing agency for many of the discussed action points.

1.2 F&G support the idea of a Protected Areas Network; however, we question the sense of excluding privately owned land, which will still form a critical part of habitat corridors for habitat management.

1.3 F&G support the idea of cross-agency agreements for biodiversity. We, too, have been involved in advocating for sediment reduction into waterbodies and other cross-agency management plans with biodiversity goals.

1.4 F&G argue that all New Zealanders, not just those who recreate in conservation estate, rely on publicly owned land to provide habitat to wildlife, including indigenous species. We also argue that we already pay via taxes for the upkeep of the conservation estate. While charging for huts and landing fees may be appropriate, charging just to enter crown land to recreate is not a good precedent to be setting.

1.5 F&G supports the review of concession charges and views commercial users as a fair avenue for obtaining additional funding.

1.6 F&G would also like to be a contributing agency for the development of indicators for effective monitoring of biodiversity and developing a framework for identifying and prioritising high biodiversity value areas.

1.7 F&G anticipate that there is still a place for valued introduced species as part of the restoration of ecosystems and that it is not possible to return all ecosystems to a pre-human time where only indigenous ecosystems were present. Your consultation document does not mention Valued Introduced Species; therefore, we would like to follow up with you regarding these species.

1.8 F&G wants to continue to be involved with cross-agency initiatives to ensure early, cost-effective intervention is carried out to reduce the impact on biodiversity or biosecurity threats. We anticipate that the species that we manage, namely game birds and sports fish are not considered biosecurity threats or pest species.

## **2.0 Agreed biodiversity priorities are driving investment and action**

*Action 1: Develop a national picture of our most important biodiversity values and quantify the costs to protect and restore priority species and habitats.*

*What this means: We want to identify and agree on priority species and habitats. This is so we can focus our efforts and determine how best to work together to protect and restore them, regionally and nationally.*

2.1 F&G supports the intent of this action point. However, we are also able to be a contributing agency and are heavily involved in new biosecurity issues.

F&G would like to be involved as a contributing agency for actions 1 & 2.

2.2 Action 2 includes protection and restoration of high-priority degraded habitats and developing nature-based solutions for biodiversity and climate change resilience, including wetland restoration.

2.3 We note that F&G are involved in the management of some RAMSAR wetlands in New Zealand. These internationally renowned wetlands provide protection for game birds and a number of endangered indigenous species.

F&G also owns or manages a number of sites that provide access to both sports fishing / game bird hunting opportunities which also provide habitat for a range of indigenous biodiversity.

2.4 F&G also actively monitors the species that we manage. F&G would like to see more monitoring information sharing and coordination between organisations and agencies to gain greater insights into population trends and changes.

2.5 F&G would like to be involved in the development of high biodiversity value areas. F&G promotes the spatial mapping of natural values and has been working to get better spatial data of our own game bird hunting and fishing resources.

2.6 F&G struggle to map resources that are purely accessed via private property because sometimes an “exclusive capture” issue exists. This is when private landowners do not allow access, unless fees are paid for exclusive hunting or fishing access. While this is a landowners prerogative that we can't change, we do note that wildlife is not owned by these landowners. However, by failing to provide access there is an appearance that the game birds or sports fish are property of the landowner, which is not the legal case in New Zealand.

2.7 F&G support the idea of a Protected Areas Network; however, we question the sense of excluding privately owned land, which will still form a critical part of habitat corridors for habitat management. Wildlife does not exist and thrive in concentrated areas; they need corridors to move to other suitable habitats.

2.8 F&G support the idea of cross-agency agreements for biodiversity. We, too, have been involved in advocating for sediment reduction into waterbodies and other cross-agency management plans with biodiversity goals. We are also mindful of nature-based solutions to climate change and are concerned about the projected distribution and abundance of salmonids, among other freshwater species. We are also concerned that increasing water temperatures or more drought weather events could result in an increasing number of botulism outbreaks to the detriment of game birds.

### **3.0 Increased external funding, revenue and support is delivering more work on biodiversity priorities**

*What this means: We want to attract investors and generate revenue for nature, and we want to make it easier for people to access government support.*

*Action 3: Develop a biodiversity investment prospectus to attract and direct external investment into biodiversity priorities.*

*Action 4: Generate new revenue for public conservation lands and waters to invest back into biodiversity.*

3.1 F&G await the Wildlife Act review and answers to questions around species ownership, which are all relevant to investing in nature values and biodiversity. It will be interesting to see how an investment prospectus can deal with these issues, including any hierarchy or priority that has not yet been set through this legislation.

3.2 F&G is concerned that DOC budgets have already been cut and we question the likelihood that this amount of funding will be provided by the private sector.

3.3 F&G submitted to DOCs consultation on charging for access in Feb 2025. There have been no hearings to date or updates on this work. The discussion document states that *“we need to develop a better revenue model for access and use of public conservation lands and waters. We need to ensure that those who benefit from using these areas contribute at an appropriate level to their maintenance and to protecting and restoring biodiversity”*.

3.4 F&G argue that all New Zealanders benefit and therefore should pay for protecting and restoring biodiversity. We also argue that we already pay via taxes for the upkeep of DOC estate. While charging for huts and landing fees may be appropriate, charging just to enter crown land to recreate is not a good precedence to be setting.

3.5 F&G support the review of concession charges and sees commercial users as a fair avenue for obtaining more funding.

*Action 5: Increase private investment in biodiversity by supporting business sector demand and system integrity including private sector natural based financial disclosures, reporting and investment.*

3.6 If the government is serious about obtaining external funding, perhaps introducing a “benefit to NZ” requirement in the Overseas Investment legislation could require overseas investors to invest in biodiversity and access to their private property. The funding expectation would need to be proportionate to the opportunities for restoration or preservation of habitat on site and would therefore likely not extend to a general pool fund for spending off-site. It would be reasonable to only apply this to the land that they own, rather than crown-owned land, the exception being crown leases to foreign-owned entities.

*Action 6:- Increase the protection of biodiversity on private and Maori land by improving the accessibility and coordination of government support and incentives.*

3.7 F&G support the increasing protection of biodiversity on private land. F&G and their licence holders have been actively involved with planting days both at rivers and wetlands to improve habitat. This has often been on private land.

3.8 F&G are concerned about the reduced funding to the QEII trust, which will result in a reduction in the good work that they have been doing with landowners.

There could be an opportunity for landowners who have carbon obligations to be granted credits for biodiversity work carried out on their wider holdings.

#### **4.0 An evidence- and knowledge-based approach is driving improvements in practice and decision making for biodiversity**

*What this means: We want to improve the data, knowledge and lessons from successful*

*partnerships to drive good decision making and measure the difference we make for nature.*

*Action 7: Agree and implement an achievable set of priority indicators for monitoring progress on national targets, monitoring the effectiveness of interventions and meeting statutory and international reporting requirements.*

4.1 F&G are also working to improve our monitoring and reporting procedures. F&G would like to have access to the “*monitoring and reporting framework that has been completed to investigate habitat health, climate change effects, compliance, water quality and pollution across marine reserves*”. We would also recommend reviewing water pollution in lakes, rivers and wetlands as this will also impact indigenous biodiversity. We note that MfE is the lead agency for this work, but note that their work will overlap with regional council monitoring programmes and would like to see the details of who is doing what.

4.2 F&G would also like to be a contributing agency for the development of indicators for effective monitoring of biodiversity and developing a framework for identifying and prioritising high biodiversity value areas.

*Action 8 :Support Māori to use knowledge systems, including mātauranga in decision making and biodiversity management.*

4.3 F&G support the use of Māori knowledge systems including *mātauranga* in decision making and would like to learn of the freshwater examples that could also be relevant to the work that we do.

*Action 9: Capture and embed the lessons from existing partnership-based models for biodiversity and biosecurity management decisions on future programmes*

4.4 F&G regions have been involved in a number of partnership based projects promoting positive biodiversity outcomes and would like to continue to be involved in these working groups.

*Action 10: Greater investment in nature-based solutions*

4.5 F&G support nature-based solutions and restoration of indigenous ecosystems in wetlands, forests, coastal and marine areas.

4.6 F&G anticipate that there is still a place for valued introduced species as part of the restoration of ecosystems and that it is not possible to return all ecosystems back to an earlier time where only indigenous ecosystems were present.

## **5.0 Increased capability and support enables New Zealand to address the state of our biodiversity**

*What this means: We want to develop the right skills and encourage people to work together to look after nature, including in the biosecurity space.*

*These actions would be the main focus of the implementation plan and the work completed by central and regional government between now and 2030.*

*Action 11: Develop a cross-sector plan to address the most important capability gaps in the biodiversity system*

5.1 F&G suggest that there isn't so much a skill gap, it is more likely a lack of funding to employ people that can do the work in biodiversity that is the problem.

*Action 12: Increase New Zealanders' awareness of the value of our biodiversity, show how they can make a difference to biodiversity in their communities and drive urgency and momentum for action.*

5.2 F&G encourages increased awareness of the value of our biodiversity. F&G also notes the increase in local groups that work on projects such as planting days and public awareness and advocacy generally.

*Action 13: Establish cross agency emerging risks capability for domestic biosecurity from new and emerging pests and diseases*

5.3 F&G wants to continue to be involved with cross-agency initiatives to ensure early, cost-effective intervention is carried out to reduce the impact of biosecurity threats on biodiversity. It is not clear in the table what the highest priority biosecurity threats are (for example, which specific fish species) for current and potential future impact on indigenous biodiversity. We anticipate that the species that we manage, namely game birds and sports fish are not considered biosecurity threats or pest species. Your clarification of this would be appreciated.

## 6.0 Conclusion

6.1 Fish and Game generally supports the work discussed in these documents, with specific points mentioned.

6.2 Fish and Game would specifically like to follow up on the following points:

<b>Para Number</b>	<b>Topic</b>	<b>Requested Follow up</b>
1.7	Valued Introduced Species	There is no specific mention of Valued Introduced Species in your consultation document. Therefore we conclude that the status quo remains for the management of these species.
2.1	Biodiversity priorities and degraded habitats	F&G would like to be involved as a contributing agency for action 1 & 2.
2.4	Sharing of species monitoring information	F&G would like to see more monitoring information sharing and co-ordination between organisations and agencies to gain greater insights into population trends and changes.
2.5	High biodiversity value areas	F&G would like to be involved in the development of high biodiversity value areas. F&G promotes the spatial mapping of natural values and has been working to get better spatial data of our own game bird hunting and fishing resources.
2.7	Protected Areas Network	F&G support the idea of a Protected Areas Network, however we question the sense of excluding privately owned land which will still form a critical part of habitat

		<p>corridors for habitat management. Wildlife does not exist and thrive in concentrated areas; they need corridors to move to other suitable habitats.</p>
2.8	Habitat advocacy	<p>F&amp;G support the idea of cross agency agreements for biodiversity. We too have been involved in advocating for sediment reduction into waterbodies and other cross agency management plans with biodiversity goals.</p>
3.8	Biodiversity credits	<p>F&amp;G are concerned about the reduced funding to QEII trust which will result in a reduction in the good work that they have been doing with landowners.</p> <p>There could be opportunity for landowners that have carbon obligations to be granted credits for biodiversity work carried out on their wider holding. This could also extend to biodiversity work that they have done in the past with regional councils, QEII and SNA creation as well as afforestation of steep land.</p>
4.2	Indicator Development	<p>F&amp;G would also like to be a contributing agency for the development of indicators for effective monitoring of biodiversity and developing a framework for identifying and prioritising high biodiversity value areas.</p>
5.3	Biosecurity threats on biodiversity	<p>It is not clear in the table what the highest priority biosecurity threats are (for example which specific fish</p>

		species) for current and potential future impact on indigenous biodiversity. We anticipate that the species that we manage, namely game birds and sports fish are <u>not</u> considered biosecurity threats or pest species. Your clarification of this would be appreciated.
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**Attachments**

Attachment 1: About Fish and Game and the species that we manage

## About Fish and Game

- 1.1 Fish and Game is the statutory manager for sports fish and game, with functions conveyed under the Conservation Act 1987. The organisation is an affiliation of 12 regional Councils and one national Council. Together, these organisations represent approx. 130,000 anglers and hunters.
- 1.2 The sports fish and game resource managed by Fish and Game are defined and protected under the Conservation Act and the Wildlife Act 1953. The species within include introduced sports fish and a mix of native and introduced waterfowl and upland game<sup>1</sup>.
- 1.3 Our vision, purpose and values are illustrated below:

<b>OUR VISION</b> Our vision is a New Zealand where freshwater habitats and species flourish, where hunting and fishing traditions thrive and all Kiwis enjoy access to sustainable wild fish and game resources.	<b>OUR PURPOSE</b> Fish & Game New Zealand maintains and enhances sports fish and game birds, and their habitats, ensuring access for current and future generations of New Zealanders.	<b>OUR VALUES</b> <b>TRUST</b> <b>INCLUSION</b> <b>CONNECTION</b> <b>SERVICE</b>
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- 1.4 Fish and Game is entirely funded by licence holder fees and private contributions, meaning the delegated function of managing the species for the public good is funded entirely by the users. It is a democratic '*user pays, user say*'s organisation. Using this system, Fish and Game funds public good research to ensure fisheries and game populations are managed sustainably; undertakes compliance with the licencing system; and contributes to public planning processes to ensure that hunters and anglers values are recognised and provided for.
- 1.5 In relation to planning, Fish & Game have the statutory function to advocate for hunters and anglers values and ensure that the habitats of gamebirds and sports fish are provided for. At any one time we may have around 150,000 licence holders, and a larger number (approximately 300,000) that are transient licence holders. The habitat we specifically advocate for includes lakes and rivers that contain trout and salmon (and other sports fish) and wetlands where game bird hunting occurs.

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<sup>1</sup> Most New Zealanders refer to these species as 'game birds', distinguishing them from other types of large game, such as deer or pigs. The Wildlife Act 1953 defines these birds simply as 'game' and this phrase is used in the context of this submission.

## **Fish and Game in Resource Management**

- 2.1 Fish and Game works to provide for the ongoing enjoyment of hunting and freshwater fishing assets, the maintenance (or enhancement) of public access to rivers, lakes, and wetlands for hunting and fishing, and the protection of the habitat of trout and salmon.
- 2.2 Hunting and angling require legal and physical access both to habitats and the resource itself. Maintenance and enhancement of access is critically important to the pursuits of our licence holders. The maintenance and enhancement of public access to and along lakes and rivers is listed in the RMA 1991 as a matter of national importance.
- 2.3 We see the opportunity for proposals to be required to provide improved access both to their sites and other nearby areas that involve hunting or fishing values as a form of mitigation for any loss of values on site. We seek that Fish and Game are consulted as an expert advisor where gamebird and or sports fishery values could be impacted. We can work with government officials to ensure outcomes that achieve both economic imperatives, along with recognising and providing for hunting and fishing values.
- 2.4 We specifically seek the protection of:
  - i. habitat of trout and salmon.
  - ii. maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers where sports fishing and game bird values exist.
  - iii. preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, lakes and rivers and their margins where sports fishing and game bird values exist.
  - iv. Recognition and provision for freshwater angling/game bird hunting and amenity values.



# What does Fish & Game do?

**Who are we?** Fish & Game New Zealand manages, maintains and enhances sports fish and game birds and their freshwater habitats in the best long-term interests of anglers, hunters and all New Zealanders.

## Our vision

A New Zealand where freshwater habitats and species flourish, where game bird hunting and fishing traditions thrive and all New Zealanders enjoy access to sustainable wild fish and game resources.

**Together, let's ensure a thriving future for fishing and game bird hunting!**

## What we do

- Manage fishing and hunting regulations
- Conduct research to monitor fish and game bird populations
- Collaborate with communities to protect natural habitats
- Provide educational programmes and resources
- Advocate for valued habitats and species
- Negotiate and maintain access for anglers, hunters and all New Zealanders

[fishandgame.org.nz](http://fishandgame.org.nz)

**#ReWild**



## What does Fish & Game do?

**Species management:** We monitor and survey species populations; set season regulations; and sustainably manage pressure on the resource.

**Habitat protection:** Advocate and take action to protect and enhance lakes, rivers, streams and wetlands; and secure 'national park' status to important rivers through Water Conservation Orders.



**Access and participation:** Negotiate and advocate so all New Zealanders can access our natural places; maintain access signage, information and brochures; organise fishing and hunting events and classes.

**Public awareness:** Maintain public advocacy; schools programmes; website and newsletters; community liaison; promote the right of licensed anglers and game bird hunters to pursue their chosen pastime.



**Compliance:** Recruit, train, equip and coordinate warranted rangers, to educate and enforce regulations to ensure the fish and game resource is sustained.

**Licensing:** Provide a nationwide licensing system with a range of licence categories and sales channels that makes it easy to buy a licence. We are solely funded by licence holders.



**Council:** Hold public meetings of elected licence holders to approve regulations and budgets, set policies and provide governance for the Fish & Game system.

**Coordination and planning:** Provide research, planning and reporting; financial management and general coordination across Fish & Game New Zealand.



[fishandgame.org.nz](http://fishandgame.org.nz) #ReWild

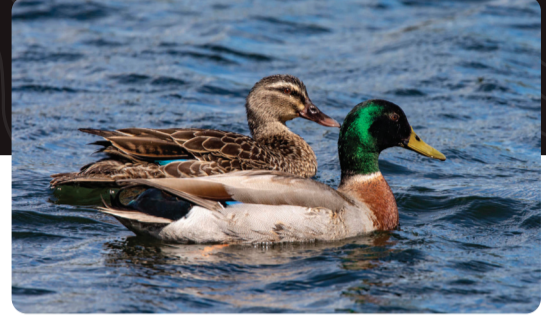
# Species we manage



Black Swan Kakianau



Californiaian Quail Koitareke



Mallard Rakiraki



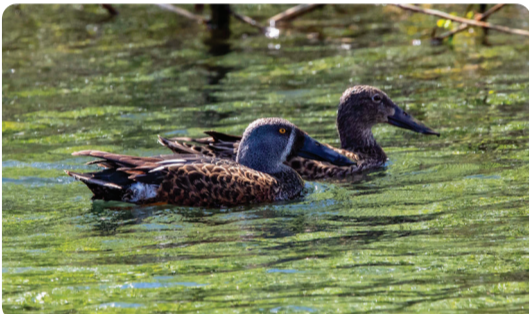
Paradise Shelduck Pūtakitaki



Pheasant Peihana



Pūkeko



Shoveler Kuruwhengi



Chukar



Grey Duck Pārera



Brown Trout



Rainbow Trout



Chinook Salmon



Sockeye Salmon



Brook Trout



Tiger Trout



Perch



Tench