

A Submission on: Draft General Policy National Parks Act (draft as at August 2003)

To: General Policy Project
Department of Conservation
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From: NZ Forest Owners Association
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General Comment

The NZ Forest Owners Association strongly supports the need for a revision of the statement of General Policy for National Parks.

We have examined the submission prepared by one of our members, Crown Forestry, MAF, and fully endorse their comments and suggestions as set out in their submission dated 4 December 2003.

We also support the need, as stated on page 14 of the draft (Section 1.2) for there to be consistency between the Conservation General Policy and the National Parks Policy.

For the completeness of this submission, below are the specific comments contained in the Crown Forestry, MAF, submission.

Specific Comments

	Support/Oppose	Comment
Policies 2 (a) through 2 (h)	Support	With Rotoaira Forest, Maori landowners are intimately involved in the forest venture and need to be adequately consulted in respect of activities planned and undertaken by the Department of Conservation on forest land and neighbouring Conservation estate.

		In particular, Crown Forestry strongly supports the development of negotiated protocols and agreements where these relate to defining the roles and responsibilities of the parties.
Policies 3 (b), (c) and (d)	Support with the following amendment: 3 (d) Where appropriate, partnerships including protocols and agreements should be negotiated and implemented with affected parties to support relationships.	The requirement for the Department of Conservation to negotiate protocols and agreements should not be restricted solely to Maori. It is equally important for other affected parties (be they individuals or organisations) to be treated similarly.
Policy 4.3.1 (b)	Support with the following amendment: 4.3.1 (b) Irreversible loss or decline in that full range caused by human-induced impacts should be prevented where this is feasible and benefits outweigh costs.	It is necessary to recognise that it is not always feasible nor sensible (from a cost-benefit) perspective to prevent irreversible loss or decline in natural habitats and ecosystems.
Policy 4.3.2 (d)	Support	It is important that local and national pest control initiatives undertaken at sites around the country are supported by all affected landowners. Too often there are examples where the Department of Conservation's unwillingness to become involved in local pest control initiatives create difficulty for neighbouring landowners. Direct reference to "joint working programmes" is strongly encouraged.
Policy 4.3.3 (b)	Support with the following amendment: A capacity to suppress wildfires consistent with National Rural Authority guidelines and Rural Fire District Fire Plans will be maintained, but if a wildfire on DoC-administered land is consistent with a natural fire regime and can be allowed to burn without risk to neighbouring property or people this option....."	<ol style="list-style-type: none"> 1. As a significant landowner DoC has a crucial role in rural fire suppression and administration. It is important to other rural landowners that DoC recognises this role and is diligent in meeting its obligations under the relevant statutes and regulations. 2. It is important to differentiate between DoC-administered land and other land in respect of a policy allowing wildfires to burn.

Policy 9.2 (a) i)	Support with the following amendment: "..... The establishment of utilities and communication facilities may be considered where: i) There are clear benefits accruing to the parties making an application that cannot be duplicated by location outside public conservation lands and waters;....."	Sometimes the only sensible (i.e. practical) access to other land may involve crossing Conservation estate. Similarly, often the most practical site for utilities such as remote weather stations and radio repeaters – which are often of use to more than one party – are on conservation estate. We believe that the Department should actively consider a wider range of potential benefits in respect of access easements, remote weather stations and radio repeaters in particular.
Policy 10 (h)	Support	Environmental certification initiatives undertaken by New Zealand forest owners require far more active management of non-planted areas (reserves) than has been the case in the past. Access to public domain research information collected by the Department assists forest owners in managing their reserve areas.
Policy 11 (a) and (g)	Support	It is important that during the development and statutory consultation phases of park management plans, that affected parties and the public in general are afforded proper consultation opportunities. This also applies to proposed amendments to plans.

Rob McLagan
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NZ Forest Owners Association

19 December 2003