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29 June 2022

## **Conservation management and processes discussion document**

### **Introduction**

Federated Mountain Clubs was formed in 1931 and advocates for the backcountry on behalf of 22,000 members in 100 clubs. Our organisation has contributed significantly to gaining protection, as public conservation land, for much of the nation's wild space.

Through our close interest and involvement in conservation management and processes, FMC has been, and remains, insistent that this wild commons is managed wisely: that it remain wild and in strong health, that it remain in public hands and freely accessible, and that concessions for commercial use are treated as the privileges they are.

We thank you for the opportunity to contribute our expertise to this discussion about conservation management and processes.

We would welcome korero on this submission with Department of Conservation staff.

### **Problem identification, analysis, and solutions**

Identification of a problem and its accurate analysis are key to its solution.

FMC agrees that certain difficulties relating to present conservation management and processes may be significant enough to warrant consideration of legislative change, and we agree with aspects of the discussion paper's issue identification, as discussed later in this submission.

However, we believe the analysis provided in the discussion document is inaccurately-focused in several respects, even at the fundamental level. Consequently, certain of the solutions it suggests, if enacted,

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could have minimal or no positive effect or even induce additional difficulties in conservation management and processes. Meanwhile, other existing difficulties are unaddressed in the document and so would persist.

Below, we articulate and make recommendations on our view of broad issues and issues relating to planning and concessions, additional and/or related to matters raised in the discussion document. Following that, we address the discussion document's options directly.

Note that, as it would be impossible to discuss the discussion document's positions on potential relevant legislative change without korero on relevant other existing and potential legislation and policy, such other legislation and policy are addressed in this submission and should therefore be considered in scope.

## **FMC's views and recommendations**

### **Broad issues**

#### ***Legislative purpose***

The discussion document's problem descriptions on pages 1-5 expose what FMC views as a critical flaw. According to the statute, conservation and Departmental functions are firstly for nature's intrinsic value (s2 Interpretation and s6 Functions of Department). Instead, the descriptions strongly suggest that conservation is for human purpose, or at least that human purpose and intrinsic value have equivalent priority in the legislation, for example *Why...* on page 5:

*Ensuring that public conservation lands and waters (PCL&W) are appropriately managed, protected, and preserved is one of the key functions of the Department of Conservation (DOC), as these areas allow New Zealanders to connect with nature, provide important habitats for native species, and give protection to key historical and cultural places.*

Prevarication on protection of nature for its own sake – a setting which sets the 'tone' for human activity on public conservation lands and waters – would be prevarication on the legislation's purpose. The legislation's cascade of priorities – conservation first, followed by the 'fostering' of recreation and the 'allowing' of tourism, and concessions as 'conceded' privileges - is fundamental to New Zealand's conservation statute and therefore conservation management and processes, and must be clear in all relevant public discussion, including this korero. It is strongly advisable, for the statute's integrity, conservation, the public, and the integrity of the task at hand, that the Conservation Management and Processes consultation team review their work in this light.

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### *General policies' partial reviews' lack of conclusion*

Lack of outcome of partial reviews of Conservation General Policy and General Policy for National Parks may play a significant role in problems relating to conservation management and processes. The reviews were directed by a former Minister of Conservation and the New Zealand Conservation Authority in 2019 in response to a comment by the Supreme Court in its 2018 *Ngai Tai ki Tamaki* judgment.

The reviews were intended to clarify the effect of the Conservation Act's s4 (Act to give effect to Treaty of Waitangi).

Unfortunately, the effect the general policies' 'openness' may have had on conservation management and processes, and possibly other statutory functions, since the reviews were triggered, is largely unaddressed in the discussion document. FMC suggests that at the very least, these reviews' lack of outcome has stalled approval of planning documents.

In the absence of appropriate analysis of this issue, and of conclusion to the reviews – conclusion gained either by completing the reviews which may involve policy changes, or by dropping them - any such effect/s will remain imprecisely understood and even potentially unhelpfully obscuring management and/or process issues that genuinely need to be addressed and for which legislative review would offer relief.

Concluding the policies' reviews may resolve at least some aspects of the management and process issues driving the proposed legislative amendments.

This matter is not to be taken lightly. If properly separating the effects of the partial reviews' openness from any wider problems relating to management and processes is not possible, FMC suggests that work on conservation management and processes legislative change be paused until the reviews are concluded. This will support accurate problem identification and, as far as possible, consequent appropriately-targeted solutions.

### **Recommendations:**

- **The conservation management and processes consultation team should review its work to ensure the relevant legislation's prioritisation with respect to conservation and human activity on public conservation lands and waters is clear.**
- **The Department of Conservation should investigate potential influence of the lack of conclusion of the general policies' partial reviews on problems relating to conservation management and processes; and**
- **if such investigation identifies that the partial reviews' openness is influencing conservation management and processes, appropriate adjustments should be made to work on conservation management and processes legislative changes; and**

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- **if effects of the general policies’ partial reviews’ openness cannot be separated from other relevant issues, then work on conservation management and processes should be paused until the reviews are concluded.**

## Conservation management planning issues

### *Planning’s purpose*

Conservation management planning is concerned primarily with conservation, and secondly – and so long as it is not inconsistent with conservation - the fostering of recreation. Such recreation is intrinsically ‘on nature’s terms’. This expresses the heart of the legislation. While technical aspects of conservation and basic recreation activity change over time, the fundamental activities remain largely the same (for example, pest control and public access). Sine qua non features of conservation management planning should therefore be relative simplicity and longevity.

Where planning has become, or is becoming, unduly complicated in its juggling of activities other than conservation and basic recreation, and where there is pressure to alter plans on the basis of issues that are secondary to conservation and recreation, such as commercial pressures, it is possible that there has been departure from core purpose necessitating reset in proportion to the departure.

Plan reviews and amendments must be accessible where provisions for management of conservation and on-nature’s-terms recreation are unsatisfactory, for example, where the climate and/or biodiversity crises indicate change is needed.

Conservation- and recreation-related qualitative triggers for plan review and amendment are more suitable to conservation management planning than fixed temporal ones (which are, in any case, ‘fixed’ in writing rather than in actuality, as the planning backlog shows).

### *Content*

Related to the previous issue is the matter of plans’ volume and arrangement.

It is a truism that the future is best planned for with robust understanding of the past and the present. FMC admires the rich natural and human historic and visionary context provided in many conservation planning documents. However, even the best plans serve their purpose well only if they are used; they serve their purpose best if they are used by all relevant parties.

Voluminous and complex plans including extensive and episodic descriptive information exceeding statutory requirements do not invite everyday use and consequently more readily allow variance. Many Departmental planning instruments’ length and complexity are barriers to their routine use as practical working documents and therefore more likely to enable variance.

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(There are several possible answers to this issue. These include placing non-requisite background content in separate documents that may be reviewed separately, review of the concept of Place, and a strict focus on brevity within single documents.)

In addition to encouraging increased plan use by operations and decision-making staff and others, and keeping variance as low as possible, addressing this issue is likely to enable Departmental resourcing benefits.

### **Public participation**

It is essential that members of the public continue to have the right to have input into planning for public conservation land, foremost because the land is publicly owned, and also because the public has relevant knowledge that is not necessarily held by the Department and which has power to improve planning.

However, it is not simply a question of *if* the public has opportunities to engage; *how* the public is engaged is important also. The discussion document does not address the benefits to Departmental resourcing and public faith in Departmental processes of ensuring engagement is as well-focussed as possible, including insistence on clarity about what is *in scope* and what is *out of scope*.

Conversely, and of relevance to the subject to hand, relatively open-ended ‘Have your say’ consultations can invite, and be inferred as validating, submissions seeking outcomes that would be in tension with relevant statutory provisions, with downsides for Departmental resourcing and for public faith in planning processes’ integrity.

(FMC wishes to acknowledge that recent noticeable improvements have been made in certain Departmental public engagement, and to thank DOC for them.)

It is likely that this issue has some responsibility for problems with planning.

### **Relief offered elsewhere in the legislation**

The legislation offers significant flexibility with respect to boundaries for conservation boards, strategies, and plans, with the exception of national park management plans.

There is opportunity to rationalise – or expand - in any or all of these areas where such rationalisation or expansion would benefit conservation and basic recreation.

Absence of such boundary changes over many years does not necessarily mean that present settings are optimal. FMC suggests consideration be given to potential relief available for aspects of planning issues through existing statutory provisions for conservation board and planning boundaries – and to making use of it where conservation and basic recreation would benefit.

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### **Recommendations:**

- **Plans should focus primarily on conservation and recreation.**
- **Triggers for plan reviews/changes should be conservation- and/or recreation-related; unrelated/temporal imperatives should not drive reviews/changes.**
- **The work's problem analysis should consider what, if any, influence planning instruments' volume and arrangement may play in planning processes.**
- **The work's problem analysis should consider what, if any, influence suboptimally-focused public engagement may play in planning processes.**
- **The work should consider opportunities to change board and/or planning boundaries as provided by present statutory settings as per above.**

### **Concessions**

#### ***Concessions are privileges***

In 2020, FMC published *Conceding the commons... Conceding nature?* (<https://fmc.org.nz/wp-content/uploads/2020/07/Conceding-the-commons-29-June-2020.pdf> ). Aspects of it are discussed in this submission. We suggest the Department re-examine it for its full suite of advice. Its most fundamental point is that concessions are privileges that must be consistent with s6 of the Conservation Act 1987 and s4 of the National Parks Act 1980. These are high bars to meet.

Unfortunately, the discussion document fails to convey this most important point. Indeed, its explanation of its proposed targeted changes goes so far as to take a stance of advocacy for aspirant concessionaires, to the extent that it perversely includes certain Departmental acceptance of responsibility for unauthorised activity due to approval difficulties.

Further, while documenting the (valid) disappointment of researchers facing permitting delays in making its case, it is silent on the fact that the objects of many concession applicants are extractive/invasive activities such as mining, grazing, and hydro schemes. In sum, it misrepresents concessions' role in the legislation and is a poor starting point for public engagement on legislative reform.

FMC agrees that certain changes would be helpful to conservation legislation's permissions provisions, but they must ultimately be consistent with the legislation's purpose. While it is clearly too late to change the discussion document's content, its intent will need to be reviewed in the light of the relevant legislation's spirit and letter, in order to ensure the work is focussed in accord with the statute.

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### ***Clarity needed on the term 'activity'***

In FMC's view, the term 'activity' is open to manipulation by concession applicants to advantage their applications. The Conservation Act's s2 says: *activity includes a trade, business, or occupation*. This allows generic or specific description of activities.

For example, if an organisation interested in building a hydro scheme calls the proposal 'energy generation', it may be declined under Conservation General Policy 11.3(a). If it is termed 'hydro generation', it may be declined because there are other places where similar projects are perhaps granted but not built, or which are preferable in some way/s. However, if an applicant gives a unique description to the sought activity, perhaps including the applicant's name and the proposed site, the 'activity' may gain an advantage. In this way, s17(U)(4), in itself a well-conceived part of the Conservation Act, can be effectively neutered.

Conservation and recreation themselves, the integrity of the legislation's intent, and the public are disadvantaged by this situation.

FMC therefore suggests introducing greater clarity on the term 'activity'.

### ***Applicant suitability test provision needed***

Suitability of people/organisations seeking privileges on public conservation land is a significant consideration, for the land and for the public.

It is particularly so given the high level of trust involved where, as is frequently the case, the relevant sought or granted activity is in a remote location.

FMC suggests introduction of a requirement that concession applicants be fit and proper, as in other legislation such as the Overseas Investment Act 2005. Criteria could be held in process documents and could include, for example, that the applicant had met all requirements of any other previous or current concessions held.

Such a requirement would be in line with the legislation's protective purpose and the transparency and accountability the public rightly expect of the Department of Conservation and of parties trusted with privilege on public conservation lands and waters.

### ***Provision for linking condition breaches to provided penalties is needed***

At present, concession breaches are not linked to provided penalties for offences, which include fines, imprisonment, forfeiture, and liability.

This situation is not equitable in its most basic way: explicitly-stated penalties for offences by non-concessionaires are not made explicit concession conditions. It falls short of the accountability the

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public expects of parties granted the privilege of concessions on public conservation land, and of the Department itself.

Therefore, FMC suggests introduction of a statutory provision that explicitly links concession condition breaches to provided penalties for offences.

#### *The Conservation Act's 12-month limitation on breach sanctions needs review*

Given the remote locations of many concession activities and that Departmental resourcing can be stretched, responses to breaches can take longer than the 12 months presently provided for action under s43(2).

The current statutory setting allows non-compliant concessionaires in remote places, and/or where Departmental resourcing is limited, to avoid consequences for breaches, and, consequently, for the land and the public to be disadvantaged.

FMC therefore suggests review of the present 12-month limitation on breach sanctions.

#### **Recommendations:**

- **The intent of the work as it applies to concessions should be reviewed in the light that concessions are privileges as per above.**
- **Greater clarity on the term 'activity' should be introduced to the legislation as per above.**
- **A requirement that concession applicants must be fit and proper should be introduced to the legislation as per above.**
- **A statutory provision explicitly linking concession condition breaches to provided penalties for offences should be introduced.**
- **The Conservation Act's 12-month limitation on concession breach sanctions should be reviewed as per above.**

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## Matters identified in the discussion document

FMC's relevant problem analysis and identification and recommended responses are above and should be read in conjunction with our response to issues presented in the discussion document (following).

## Conservation management planning

### *Triggers for review/amendment*

As noted above, conservation and basic recreation, which are prioritised in that order in conservation legislation and are primary foci of management planning, inherently undergo little change over time.

Significant climate-related, biodiversity, and/or tectonic disruption, or development in basic recreation could be valid prompts for plan review/amendment, which should be able to be actioned within reason as the need arises. Evolving Departmental operational and technical considerations should, as far as possible, not be focal points for changes to individual plans. Temporal deadlines, or issues secondarily related to conservation or basic recreation are inapposite triggers for reviews/amendments of individual plans.

There is therefore merit in abandoning the present 10-year full-review cycle and replacing it with a 10-yearly statutory check that could lead to reapproval or partial or full review.

If this path were to be taken, DOC initial engagement should be with the New Zealand Conservation Authority and conservation boards, whose membership is appointed after Maori consultation and includes bespoke positions for iwi; if additional tangata whenua engagement were to be considered, engagement with Federated Mountain Clubs, Forest and Bird, and the Royal Society would be appropriate alongside. FMC agrees that, if replacing the 10-year planning review cycle with 10-yearly appraisals is pursued, where Treaty settlement legislation is not relevant, the New Zealand Conservation Authority or conservation boards should be invited to determine paths taken, with the final decision resting with the Conservation Director-General.

Further, as noted above, board and planning boundaries are largely not fixed in the legislation; given this, and that conservation and basic recreation planning imperatives tend to have universal characteristics (for example, pest control and public access), it is worth considering potential for issues to be addressed on a nationwide scale. The Nationwide Conservation Management Strategy partial review for biking, which began in 2021, is an example. No legislative change is needed to allow such a review. Improved legislative clarity that national park management plans and conservation management plans must give effect to conservation management strategies would add extra power to such reviews and is recommended by FMC.

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**Recommendations:**

- **In the context that this submission’s broader advice has been taken into account, replacement of the 10-year full-review cycle with 10-yearly statutory checks should be considered as per above.**
- **Existing legislative provision for nationwide planning reviews on certain issues should be taken into account in the conservation management and processes team’s ongoing work.**
- **Amend the legislation to make clear that national park management plans and conservation management plans must give effect to conservation management strategies.**

***Updating plans outside (present) cycles***

Conservation and basic recreation are the relevant legislation’s priorities. If an issue is of sufficient significance to conservation and basic recreation, it should trigger timely and proportionate review on its own account. As FMC has articulated above, such prompts for review accord with temporal cycles arbitrarily only. On that basis, we have recommended consideration of changing from 10-year review cycles to 10-year checks.

We wish to make several other relevant points:

Tinkering with individual planning instruments on secondary matters with limited consultation is not necessarily a positive or even benign action, especially where it occurs repeatedly. It has potential to cause focal and practical disjunct from what should be planning’s primary priorities.

Relatedly, with open boundaries for conservation boards and most planning instruments, there is clear capacity for nationwide review of particular issues, such as in the Nationwide Conservation Management Strategy partial review for biking. Such review allows the Department and the public to generate and interrogate ideas thoroughly. There is also potential for the Department to make further use of nationwide technical standards/guidelines; these could be consulted on and final versions referenced in planning instruments. It is unlikely that this would require legislative change. FMC would support consideration of further development of such standards/guidelines.

Lastly but not least, the democratic principle must not be diluted. It would be inappropriate for the Department of Conservation to determine what does and doesn’t constitute ‘public interest’. Full public participation in planning for public land is vital: in principle; to avoid inherent difficulties relating to defining ‘limited interest’ and consequent consultation; and because the public holds a great deal of relevant knowledge that the Department of Conservation should seek to continue benefiting from through consultation.

Financial and other costs of resourcing well-conceived thorough processes are outweighed by such processes’ advantages, which include delivery on the public’s democratic right to full engagement.

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**Recommendations:**

- A streamlined process for partially reviewing planning instruments should not be adopted as proposed.
- See the section above (*Triggers for review/amendment*) for related recommendations.
- Consideration should be given to further development of nationwide technical standards/guidelines as per above.

***The process for public notification of intent to develop or review a national park management plan***

National parks and their management plans bear certain similarity to other public conservation land and its relevant planning. But significant distinctions are cause for pause on the discussion document's proposal to remove the requirement to notify intent to prepare or review a plan.

The parks, whose planning boundaries are firm, are special places, in and of themselves, and for the public. S4 of the National Parks Act says that these places *contain scenery of such distinctive quality, ecological systems or natural features so beautiful, unique, or scientifically important that their preservation is in the national interest.*

Their plan reviews naturally attract significant public interest, much of which involves preparation for those reviews. The period immediately following notified intent is a useful – and well-used - time for the Department of Conservation and stakeholders to collaboratively identify significant issues in an open-minded and relatively informal way.

All conservation management planning is, in the end, a serious matter; this is particularly so for the nation's cherished national parks. Stakeholders must not only be involved; they must be involved as early as possible, so that all relevant input from them and from the Department is on an even footing.

FMC does not support removal of the requirement to notify intent to prepare or review a national park management plan.

**Recommendation:**

- **The National Parks Act 1980 should not be amended to remove the requirement to publicly notify the intent to prepare or review a national park management plan as per above.**

***Public notification and public input principles and practicalities***

FMC agrees with the discussion document's observation that most people access public information online, and agrees that public notification of development of draft planning documents should therefore occur online.

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We do not agree that provisions for public hearings should be reduced, while acknowledging that some submitters will wish to present online or by telephone and should be enabled to do so. Hearings are fundamental to democratic participation – in this case relating to collectively-owned public conservation land - and as a principle must remain, undiluted.

**Recommendations:**

- **Public notification of development of draft planning documents should go online.**
- **Public hearings on draft planning instruments should remain and should include capacity to present online or by telephone.**

***Publication of planning documents***

FMC agrees with the discussion document’s observation that most people access public information online, and agrees that, as a principle, publication of draft and approved planning documents should therefore be online.

However, there should be leeway for hard copy documents to remain available to members of the public on request

**Recommendations:**

- **Public notification of draft and approved planning documents should be online.**
- **Hard copies of draft and approved planning documents should remain available to members of the public on request.**

**Concessions**

***All activities require concessions***

Conservation is conservative. At its most fundamental, it concerns letting nature ‘be’ on its own terms, supported by human intervention as needed. Recreation must be in accord. The statute enshrines this. Departure from this setting, to allow a private individual or organisation some privilege is to ‘concede’ part of the natural values the statute was established to protect, and of the collective good. Applications for such exceptions - or ‘concessions’ – must accordingly go through the exacting process set out in Part 3B of the Conservation Act.

Normalisation of exceptions to the statutory first principle of conservation – such as the provided example of collection of ‘non-protected’ insects and as proposed by the discussion document – is not advisable. (The fact that such an example, which if actualised, could lead to need for protection of formerly non-protected species due to over-collection, is itself cause for concern.)

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FMC sympathises with, for example, scientists for whom concession processing delays have meant disruption to research. However, there are ways to achieve allowance of low-impact commonplace activities without undermining the relevant statutory purpose through tweaks to Part 3B.

FMC does not support giving the Minister of Conservation the ability to make regulations that generally authorise specific activities and remove need for concessions.

More appropriate means to address the issue identified include the following. Foremost, robust and timely processing should be provided for, with application fees at least covering resourcing costs. Further, s17W's provisions must be adhered to. Relatedly, we note that s17W(2) provides a pathway for granting new activities.

Further, expired concessions should not be allowed to continue while the applicant is seeking renewal; it behoves an applicant to provide complete information about the activity and the Department to process the application diligently.

**Recommendations:**

- **The Minister of Conservation should not gain the ability to make regulations that generally authorise specific activities and remove the need for concessions.**
- **The issue that processing applications for low-impact commonplace activities can be difficult should be addressed through more appropriate means including timely and robust processing resourced through application fees, and through provisions of s17W of the Conservation Act.**
- **Expired concessions should not continue while the applicant is seeking renewal as per above.**

***Availability of concessions for pre-approved activities***

FMC largely agrees with the discussion document's proposal of on-demand availability of concessions for pre-approved activities, primarily because it would simplify what is presently a relatively lengthy process.

A downside to that simplification is that the ease with which a concession could be gained could dilute the significance of that acquisition. Therefore, information provided to people gaining concessions for pre-approved activities should convey clearly the privilege of holding concessions.

**Recommendations:**

- **The Conservation Act should be amended to provide clarity that activities can be pre-approved in advance of, or without, an application being received.**
- **Information provided to parties gaining concessions for pre-approved activities should convey the inherent privilege of concessions.**

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### *Clarification on aspects of tendering*

The discussion document describes the concessions framework as 'reactive', and in a pejorative tone. It is correct in that response to concession applications is inherently reactive as private entities seek over-and-above privilege from the common good. It is incorrect in that a reactive stance is not pejorative: the public expects that the statute's integrity will be upheld.

Tendering is inherently antithetical to the statute's purpose as, instead of acting in protection of and advocacy for nature, the Minister of Conservation and the Director-General would necessarily 'proactively' seek opportunities for others' private privilege on public conservation lands and waters. Justifications, such as fairness and determining appropriate pricing, are weak (in the case of the former, continuing emergence of new aspirant concessionaires undermines the case, and for the latter, it is that comparable operations elsewhere support robust pricing estimates). The 'first-in-first-served' approach, while imperfect, better accords with the statute's intent.

Therefore, while the Act is silent on what kinds of activities could be tendered, FMC's view is that they should be confined to activities of strong public interest. This may be difficult to provide statutory definition for, but we suggest that consideration be given to the concept.

Regardless of the above, FMC agrees that clarity relating to s17ZG(2)(a) would be positive. This is that the Minister of Conservation should be able to return an application if initiating a tender process would be more appropriate; also, that a concession should be able to be offered directly to a successful tender candidate. Given that poor performance on timeliness has been raised as a relevant issue, even in the discussion document, a timeframe for initiating a tender process should be included.

### **Recommendations:**

- **Consideration should be given to introduction of guidance on activities for tender as per the above guidance.**
- **The Conservation Act should be amended to give the Minister of Conservation the ability to return a concession application if initiating a tender process would be more appropriate.**
- **The Conservation Act should be amended to allow the Minister of Conservation to offer a concession to a tender candidate directly.**
- **Due to the need for timeliness, timeframes relating to initiation of the tender process should be included.**

### *Statutory timeframe for reconsideration requests*

FMC agrees that a statutory timeframe for decision reconsideration requests would be positive, and that 15 working days is an optimal period.

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In addition, we suggest that submitters should have reconsideration rights. The land/water is publicly-owned, and all members of the public should have a say, equal to that of a concession applicant, on whether exceptional rights should be granted over it.

**Recommendation:**

- **The Conservation Act should be amended to provide a statutory timeframe of 15 working days for an applicant to seek a reconsideration of their concession application.**
- **The Conservation Act should be amended to give submitters reconsideration rights.**

**Minor and technical proposed amendments**

FMC agrees with the rationalia for the proposed minor and technical amendments proposed in the discussion document's Chapter 3.

**Recommendation:**

- **All minor and technical amendments proposed in the discussion document's Chapter 3 should be adopted.**

**Summary**

Amendment of a significant part of a legislative suite has intrinsic risks. The narrow focus on the immediate task can allow insufficient attention to be paid to the complete statutory picture, and for trouble-shooting to be sub-optimal.

Indeed, the commissioning Minister of Conservation at the time of commissioning noted her general opposition to "piecemeal reform". Despite the positive intent of the resulting Conservation Management and Processes discussion document, and its certain proposals of what FMC sees as real merit, our organisation's view is that the commissioning Minister's caution with respect to piecemeal reform was well-founded in this case. As documented in this submission, it is not only that the work's problem identification is flawed and that many proposed legislative changes could have sub-optimal outcomes; the overall relevant legislative intent is imperfectly represented, thereby undermining the work and public faith in it.

Federated Mountain Clubs therefore suggests that the Conservation Management and Processes work be reviewed in the light of concerns raised in this submission.

Ka mihi,

Jan Finlayson,  
Federated Mountain Clubs executive.

FMC – FEDERATED MOUNTAIN CLUBS

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