

26 February 2014



Hannah Divehall  
Department of Conservation  
Hamilton Service Centre  
Private Bag 3072  
Hamilton 3240

Dear Hannah,

### **EDS Submission on Proposed Aotea Conservation Park**

EDS is a public interest environmental law group, formed in 1971. It has a membership that consists largely of resource management professionals. The focus of EDS's work is on achieving good environmental outcomes through improving the quality of New Zealand's legal and policy frameworks and statutory decision-making processes. EDS welcomes the opportunity to comment on the proposed alterations to the status of the DOC-managed proportion of Great Barrier Island.

EDS was extremely concerned by the information contained within the stewardship land report released in 2013 by the Parliamentary Commissioner for the Environment<sup>1</sup>. Stewardship land was intended to be a temporary holding status whilst the preferred longer-term status of the land was evaluated and considered. It is an inappropriate permanent classification for areas set aside for conservation purposes and the speedy re-classification of these areas should occur as a matter of priority. EDS is pleased to acknowledge the Government is acting to implement the Commissioner's recommendations by at least reconsidering the status of Great Barrier Island.

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<sup>1</sup> PCE (2013) Investigating the future of conservation: The case of stewardship land. Office of the Parliamentary Commissioner for the Environment. Wellington, New Zealand. Pp.69 Available from <http://www.pce.parliament.nz/assets/Uploads/Stewardship-land-web.pdf>

EDS is supportive of the reclassification of the conservation estate on Great Barrier Island to a status more reflective of its natural, historical and cultural significance. Retention of the original status of the Hirakimata-Kaitoke Swamp Ecological Area and Wairahi Forest Sanctuary is supported, to ensure that the unique values of these two locations continue to receive special recognition. We also note that there is no intention to change the status of Rakitu and Kaikoura Islands (scenic reserves).

EDS is concerned that the status of 'Conservation Park', although higher than that of stewardship land, may still not be sufficient to protect all the values present both now and in the future. The Discussion Document does not appear to include an analysis of the protection status options available to this area of land, and why the status of Conservation Park is deemed the most appropriate.

EDS suggests that an analysis is likely to demonstrate that Conservation Park status is not sufficiently strong to protect the values of some of the proposed extent of the Park. An example of an area warranting additional protection might be the site of the black petrel breeding colony on Mount Hobson – one of only two such colonies remaining<sup>2</sup>.

EDS is nonetheless supportive of creating a new Conservation Park over the mapped areas on the island. We suggests that once approved, a second stage analysis is undertaken to spatially define the ecological importance of areas within the Aotea Conservation Park, and to put in place additional and more refined protection measures where appropriate.

We note that the creation of the Aotea Conservation Park will not affect the status of the Land under the Crown Minerals Act 1991. All land held under the Conservation Act 1987 on the island will continue to be listed in Schedule 4 (clause 11) of the Crown Minerals Act 1991 and so will continue to be protected from mining by virtue of section 61 of that act.

We note that there is an option to upgrade the status of the island to that of national park. Such a decision would be made under the National Parks Act 1980 and would need to follow the special procedure set out in section 7 of that act.

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<sup>2</sup> <http://www.doc.govt.nz/Documents/parks-and-recreation/places-to-visit/auckland/great-barrier-brochure.pdf>

We are of the opinion that would be step too far at this stage. There has been extensive consultation with island residents who will need to embrace any change in status. There is support for the present proposal. The added flexibility that Conservation Park status gives to enable the land to support the island's tourist infrastructure is preferred to the tighter limits that national park status would require.

EDS is supportive of the proposed name for the park, being the Aotea Conservation Park. On balance, EDS is pleased to see an upgrade in the conservation status of the stewardship land on Great Barrier Island and is grateful for the opportunity to contribute to the discussion.

Yours sincerely



**Gary Taylor**  
**Chairman**  
**ENVIRONMENTAL DEFENCE SOCIETY**

**Submitter details**

Full name – Marie Amanda Brown

Organisation – Environmental Defence Society

Contact Address – PO Box 91736, Victoria Street West, Auckland 1142

Contact phone number – 021 808764

Position – Support (see reasons in letter)