

# SUMMARY OF WRITTEN PUBLIC SUBMISSIONS FOR PROPOSED GAME BIRD REGULATION CHANGES IN NORTH CANTERBURY

September 3<sup>rd</sup>, 2024

Prepared by: Matthew Garrick, *North Canterbury Fish and Game Council*

North Canterbury Fish and Game Council staff are tasked with reviewing and providing recommendations on regional hunting regulations that better align with the Councils policies and priorities<sup>1,2</sup>. This document provides a summary of public submissions received during the game bird regulation review process in August-September 2024.

Consultation opened on August 19<sup>th</sup> and closed on September 1<sup>st</sup>. All North Canterbury game bird licence holders were notified by email<sup>3</sup> with a link to get more information on proposed changes and information on how to submit (<https://www.fishandgame.org.nz/game-bird-hunting-in-new-zealand/follow-the-hunt/hunting-news/north-canterbury-game-bird-regulation-changes>). Consultation was also promoted on social media and shared widely among hunting groups.

A public meeting will be held at the North Canterbury Fish and Game office at 6 pm on September 4<sup>th</sup> to allow submitters to provide any additional relevant information to their written submissions. The Council will make a decision on proposed game bird regulations at their September 25<sup>th</sup> meeting.

<sup>1</sup>Regulation Setting Policy – <https://www.fishandgame.org.nz/assets/DMS/About-us/FG-Regional-Councils/North-Canterbury/Council-Downloads/2022/REGULATION-SETTING-POLICY-AND-PROCESS-9-MAY-22-3.pdf>

<sup>2</sup>Purpose and Priorities – <https://www.fishandgame.org.nz/assets/DMS/About-us/FG-Regional-Councils/North-Canterbury/Council-Downloads/2024/Revised-draft-statement-of-Purpose-and-Priorities-for-22-February-2024-Council-mtg.pdf>

<sup>3</sup>licence holders that had a valid email address but elected to not receive information from Fish and Game did not receive an email.

## Summary of submissions:

14 written submissions were received by September 1<sup>st</sup>. One additional written submission was received late. In regards to the proposed changes:

- 1) Set Greylard daily bag limit to 15 birds per day for Opening Weekend, aligning it with the remaining season bag limit.

**Four** submissions **supported** this recommendation. **Eight** submissions **opposed** this recommendation. Opposing submissions to this proposed regulation change generally felt this was unnecessarily reducing opportunity for hunters that harvest more than 15 birds per day.

2) Set paradise shelduck daily bag limit during winter season to 15 birds per day

**Three** submissions **supported** this recommendation. **Seven** submissions **opposed** this recommendation. Opposing submissions to this proposed regulation change felt it was unnecessarily reducing opportunity for people that target paradise shelduck in the winter season.

3) Set summer season paradise shelduck limit to 15 in Area B.

**Two** submissions **supported** this recommendation. **Seven** submissions **opposed** this recommendation. Opposing submissions felt it was unnecessarily reducing opportunity for people that target paradise shelduck in the summer, and hindering ability to control populations.

4) Aligning winter paradise shelduck season with the end the main duck season.

**Four** submissions **supported** this recommendation. **Three** submissions **opposed** this recommendation. Opposition felt this reduction was reducing opportunity and hindering ability to control populations.

5) Aligning the pukeko season to the end of August.

**Three** submissions **supported** this recommendation. **One** submission **opposed** this recommendation.

**Common themes:** Multiple submitters that opposed recommendations felt that bag reductions should only be tied to population sustainability/viability, and reductions in bag limits were reducing hunter opportunity. Several submitters don't believe social/political licence is relevant or important to hunting regulations.

To contrast, several submitters in support of recommendations brought up licence holder satisfaction and expectations related to bag limits, simplification of regulations, as well as social licence. One submitter believes reducing bag limits increases hunter opportunity by spreading hunter pressure.

**Other issues:** Four submitters opposed the mallard summer season. Two submitters supported exploring options to increase pheasant hunting opportunity. One submitter suggested reducing the regular season daily bag limit for mallard ducks to 10-12 greylards.

All submissions received can be found in Appendix 1.

## **APPENDIX 1:**

### **Kevin Otton Licence 6451765**

Also a member of the Christchurch ROD and GUN Club.

*4) Align the end the paradise shelduck regular season in Area B to the end of July*

I have Shot paradise ducks through to September for the last 14yrs of living in Sheffield, mainly for all the local farmers in the area of Sheffield, Annat and Springfield. On paddocks and ponds.

We will have a serious problem in the area if you end it July as well as lower the bag limit on opening day for paradise ducks.

Kind regards

Kevin Otton

Max Happer

Good Evening I would like to make a submission. Why can't we keep the opening limit to 25 in the North Canterbury area, just for opening weekend . When you still allow summer duck shooting for CSI an the North Canterbury area. I would think this is doing more damage to our bird numbers in the north canterbury area, than the odd group shooting there limit on opening weekend.

Hi,

I am writing in support of all 5 changes to the North Canterbury Gamebird Regulations.

All of the proposed changes align with hunter feedback and if implemented would reduce regulatory complication & provide more sustainable outcomes for gamebirds with little or no impact on hunters.

Submitted by:

Rod Gardner

We F&G you have done it again . You changed the pheasant season with who know what data and now you are charging the bag limits with random data . I don't know who you are calling for your random surveys !!. Myself and the guys I shoot with regularly shoot our limit of mallards and change to parries in the afternoon and get very close to limiting there also. I shoot in the southern part of the north canterbury area and duck numbers are high. If this change goes through I will seriously think about not bothering with ducks and stick to shooting geese.

Your data has been seriously affected by geese being taken off the gamebird registry. I completely opposed to these changes. Also going from 25 mallards open weekend to 15 is crazy .

Regards Errol Johnston

Hey team, hope your doing well.

Personally I'd like to see the summer mallard season be done away with. I don't believe there are enough mallards around NC to justify the summer season. I know I'm not the only one that has this opinion.

Cheers

Callum

As a gamebird hunter of twenty-two years, who has regularly hunted in the north Canterbury region, I whole heartedly support all five of the proposed changes. Notably, I have a lot of support for the first regulation change: Set opening weekend greyland limit to 15.

I do not wish to speak to my submission at the public meeting.

Regards,

Ben Sowry



Thanks for the opportunity to submit on the proposed NZ Gamebird Regulations.

To help contribute opinions on such management decisions, it's vital to know from trend population counts, just how the NC duck population is tracking?

1

However, in terms of spreading the resource across as many hunters as possible, it would appear that reducing the opening weekend bag will enable more ducks to survive and therefore be available to other hunters on both opening weekend, and later during the season. I would personally support the reduction as I hunt a lot later in the season.

1b

As some feedback from a hunter who does all of his NC hunting after opening weekend, I'd be a supporter of also reducing the 'rest of season' bag to say 10-12 'greylards'. My rationale for this is that conditions have to be pretty spot on to have a good mid/late season shoot, as ducks especially on public water are hounded heavily. The outcome of a high bag limit is that hunters will stay out all day trying to get the last birds for a limit. Consequently the birds get no respite, with this situation adding to the pressure that either sees them shot or drives them away. If hunters headed home earlier in the day after bagging a more modest, but very respectable bag of say 10 greylards, it would result in more hunter opportunity, particularly on public land (water).

1c

Summer Greylard season? I realise the argument for keeping this event is that so few hunters participate, that it has no impact on the greylard population. From my perspective a summer season can not achieve what it was established to achieve, protection for standing farm crops, as the majority of hunters set up and therefore scare ducks off, stubble. Ducks on stubble are contentedly feeding away from the standing crops, so why scare them back to the standing crops.

Also having experienced a summer season many years ago in the Wellington region, I know how late you get in from a night shoot (11.00pm is quite normal), inevitably you are too tired to process them at that time, so inevitably the ducks get left till the morning. With the hot humid summer temperatures, the meat can easily be spoiled by then so they get dumped. I also do not like the disturbance caused.

Lets face it, summer hunting is about targeting vulnerable juvenile ducks, its original purpose to help farmers is flawed, it sets up circumstances that lead to meat wastage, and it is supported by such a small minority that the negatives outweigh the positives – in my opinion. Again however, professional management should come into the

equation, and my comment here would be to again ask if trend counts can assure us that the duck resource can handle the extra pressure of a summer hunt?

2, 3, 4

I have no opinion

5

Pukeko may have no pressure on them recreationally, but this may be because hunters are unaware of how destructive and aggressive they are territorially toward breeding ducks and other wetland species. Plus they are havoc on crops and wetland plantings, and any visit to the countryside these days puts beyond doubt that they have adapted arguably too successfully to agriculture, horticulture and lifestyle block development.

Again if NC is monitoring the Pukeko population, you will know if the resource is flourishing or in decline. If it is not in decline I'd question the need to reduce the hunting opportunity Pukeko's offer throughout the year, and suggest encouraging more hunters to target them.

6

Pheasants

In the parts of NC I am familiar with, my anecdotal observation of the pheasant hunting opportunity brings me to the conclusion that it can provide considerably more hunting opportunities. I'd personally like to see a minimum of 5-6 pheasant weekends with at least 2 of them being after the end of the main waterfowl season (in August in other words). Give hunters a reason to run a pheasant dog by fostering a genuine stand alone hunting resource, as opposed to just a 'bonus' opportunity for waterfowl hunters.

Andy Tannock

Licence 6427182

The proposed changes to the game bird limits for future seasons are all reductions.

Is this our what councils agenda is?

Their appears to be no biological science behind these reducing of our hunting opportunities. Just because 95% of licence holders do not harvest their limits for whatever reason is surely not a reason to punish the 5% of very keen, organised And very passionate hunters that are capable and can LEGALLY harvest their game Birds/ waterfowl.

The other very important point to make is the ability of coordinated groups of hunters To control populations of problematic waterfowl. Current limits largely permit this to Occur legally. Extra fish and game input regarding permits etc can be minimal.

I have no time for defending our political licence. Its a cop out from our council staff That appear to be reluctant to promote the hunters cause without giving away hard Earned ground of their forebares

Barry Cleghorn

To North Canterbury Fish and Game Council,

I am very disappointed in the two-week submission time presented to license holders, which in my opinion is very poor. I have been unable to respond to my fullest as I have recently had surgery and before this have been unavailable near a computer to submit.

I was at the meeting earlier in the year and was told that I would be contacted when these came up for submissions and I did not receive any communications from the Council. Last year the North Canterbury Fish and Game Council (NZFaGC) was told it needed to improve communications with the stakeholders and from my point of view this has not happened.

I feel that all the proposed changes to the Gamebird Regulations are punishing the more dedicated hunters without any real science behind the decisions. The hunter surveys are very subjective, how many hunters keep a hunting diary? In my opinion without long-term trend counts that are structured to be in the same places over the same times every year how can we be sure of what the bird populations are doing?

*1) Set Opening Weekend greylard bag limit to 15*

This punishes the top 5% of hunters without any benefit to the greylard populations which you have stated "This regulation change would have a little effect on North Canterbury hunters or harvest".

I do not see how an extra 10 birds per person per day for the opening weekend will "improve sustainability, public perception of ethical behaviour, and social licence."

*2) Set regular season paradise shelduck limit to 15*

As stated "This regulation change will not have an impact on paradise shelduck harvest or hunters in North Canterbury" so why change it for the people that do target Paradise ducks?

*3) Set the summer season paradise shelduck limit to 15 in Area B*

There is no justification for differential bag limits between the two areas, I agree with that statement but increase the Area A limit to 20 birds

*4) Align the end the paradise shelduck regular season in Area B to the end of July*

*I neither agree nor disagree but feel this is punishing hunters and not promoting the sport.*

*5) Align the pukeko season to end at the same time as quail season (end of August)*

*I neither agree nor disagree but feel this is punishing hunters and not promoting the sport.*

I feel that the NZFaGC is failing to promote Gamebird hunting in the region, especially around the great Paradise Duck hunting that is available and that is evident in the comments on the poor hunting turnout in the regular season.

From the NZFaGC meeting, I attended earlier in the year, I got the feeling that gamebird hunters in the region are the poor second cousins that we are just here and a bit annoying to deal with. This was made evident to me by comments made to the "duck hunter" at the council table.

I am unable to attend the meeting on the 4<sup>th</sup> of September but I understand that there will be people there and I hope that you do listen to our concerns.

Kind Regards  
Gareth Faulkner

Hi, the following is my submission and thoughts on the proposed gamebird regulation changes:

### **1 ) Set Opening Weekend greylard bag limit to 15**

- I agree with this proposed change. Very few hunters are presented with regular opportunities in the current North Canterbury environment to shoot 25 greylards per day – hence I agree that a lower limit will increase hunter satisfaction, bird utilisation, and our continued social license to hunt/public perception.
- With reference to greylards: I personally (and most hunters that I speak to for that matter) do not support the Mallard Summer Season – for the reasons that it somewhat erodes the value of hunting Mallards over opening weekend (arguably the most anticipated and prestigious event on a gamebird hunter’s calendar), and admittedly although not a vast number of birds are harvested in the wider scheme of things, I’ve found that this summer harvest can heavily influence (and reduce) particular localised mallard populations resting on smaller waterbodies or specific areas (that then fly to crops/stubble to feed) prior to opening weekend. I believe smarter and less conflicting ways to increase ‘hunter opportunities’ exist elsewhere.
- I would also like to see NC F&G investigate the impact of water height/level of Lake Ellesmere/Te Waihora on gamebird hunting (ie. the average harvest levels vs. the Ecan average lake height), and other native bird and plant species too. This past 2024 season saw a low lake level exist for most of the season, with very little margins flooded and food sources made available, and correspondingly we witnessed the lowest numbers of ducks on the lake for many years. However when the lake filled up in the last week of the season and neared the current opening level/height, birds quickly returned to the lake and we had some fantastic shoots like the ‘days of old’. I do wonder whether opportunities exist in the lake level space with the other stakeholders to re-evaluate things from a bird and wetland health perspective to improve the hunting resource of Lake Ellesmere/ Te Waihora.

### **Other:**

- I really value the 3x designated pheasant weekends but often they can clash with existing duck hunting plans, so are not fully utilised until August. I wonder whether the NC pheasant season could warrant being extended to every day of

August (or all of the August weekends). A low daily bag limit (1 cock) is fine, but it would be nice for those who train an upland dog all year to have a few more opportunities within the region to hunt with them.

Thanks for your consideration.

Regards,

Willie Duley

## Submission from Malcolm Main on proposed changes to gamebird hunting regulations in North Canterbury for 2025

### Introduction

Firstly, I'd like to say that I'm generally very happy with the way that the North Canterbury Fish and Game Council has been operating over the last four or five years. It has become much more proactive and engaging with licence holders, and has been working hard for their interests. In particular, I am pleased with changes to the pheasant hunting season and work undertaken around Lake Ellesmere. Also, I am very happy to see the appointment of a staff member who is dedicated to game bird work, which has been lacking in the past. However, I do have some concerns about aspects of the proposed changes to the game bird regulations, as follows.

Reduction of opening weekend greylard duck limit from 25 to 15.

The daily greylard limit after opening weekend has already been reduced from 25 to 15 birds. This is a substantial, 40% reduction, from the previous limit. However, it is probably justified because opportunities for such high bags are rare after opening weekend. Opening weekend though, is different. It's like Christmas for duck shooters, and it is a time when 25 birds easily can be shot in one day if the hunter is in the right location and has the skill. Generally, this means not hunting the big water such as Lake Ellesmere. This is because those waters only shoot well under certain conditions which rarely occur on opening weekend. Since a large proportion of licenced duck shooters hunt Lake Ellesmere on opening weekend, it is therefore logical that relatively few hunters will report having shot a limit on opening weekend. Skill also comes into the equation.

The principle reason for reducing a bag limit should be to limit the harvest if the population is being adversely impacted. I've purloined the data in Both Barrels April 2024 that show duck mean numbers for transects across North Canterbury and Central South island regions and fitted a trend line. If these data are only for greylards and are representative for North Canterbury, then they appear to show a level to slightly increasing trend for the last two decades (Fig. 1; Note that this is not statistically significant, but it would be at the 95% probability level if the two high outliers in 2013 and 2019 were ignored).

The apparent lack of hunting effects on the population is probably because mallard ducks – and let's face it, the majority of greylard genetics are mallard – are r-strategists. This means that the species is a fecund, short-lived species that is well-adapted to hunting pressure. As a result, it has a long breeding season beginning in August and extending to April, is capable of laying several clutches a year, and the clutch size is large (up to 16 eggs according to Murray Williams). In addition, it is catholic in its nest sites, and can nest well away from water.



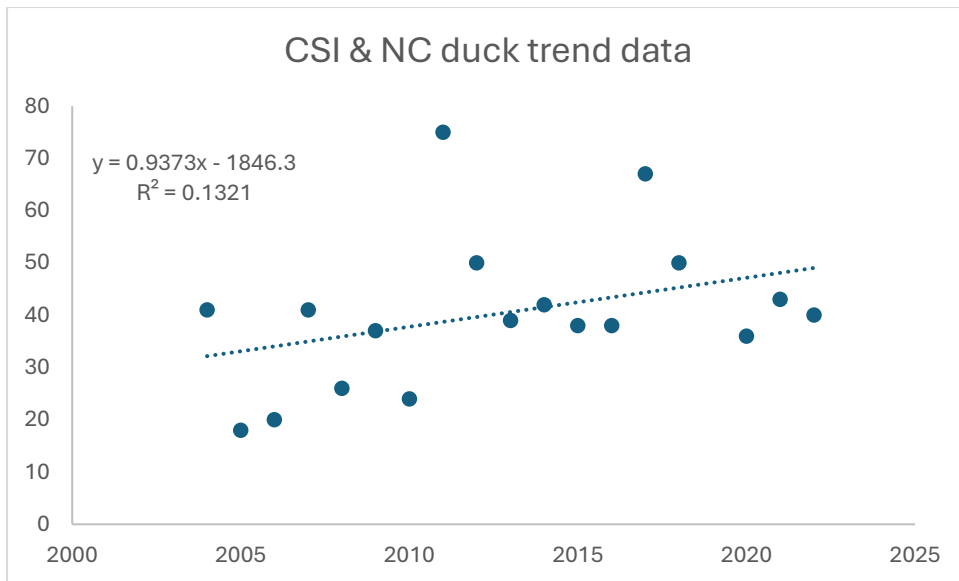


Figure 1. Mean duck trend transect numbers from 2006 until 2024 (adapted from Both Barrels, April 2024)

A recent reason for reducing bag limits is the concern over hunters losing their social licence. Personally, I haven't heard of any member of the public calling for a reduction in the limit. There are of course, those who would like the sport to be banned, but they will never be placated, no matter what the limit is. On the other hand, hunters should presumably have increased their social licence by measures such as changing to non-toxic shot, and wetland establishment and enhancement, the latter of which also benefits species other than gamebirds. However, I think that the argument of social licence in this context is spurious, especially when the adjoining region on the Canterbury Plains, Central South Island, is maintaining its 50-bird limit (throughout the season!) Admittedly, some South Island regions have a season limit of 15 or fewer, but to be appropriate, a similarly low limit would need to be consistent across the regions. In any case, in North Canterbury a 15-bird limit already applies for about 98% of the season.

The issue of hunter expectations has also been raised, with the suggestion that the limit is a target, and that hunters are disappointed if they don't reach it. In my opinion, that's not the case in this region. If a limit is low, as for example is the case in the US, then hunters naturally will be disappointed if they don't get their four to six ducks. In contrast, hunter expectations here tend to be based on their prior experience, and hunters more likely will be disappointed if they don't do as well as they did in previous years.

In summary, the daily limit for the season after opening weekend has already been reduced from 25 to 15 birds. This means that the limit is only 15 birds for about 98% of

the season, and I don't think that it is appropriate for it to be that low during opening weekend as well. At the very least, it should be 20 birds, which would be in line with Southland's opening weekend limit, but less than Otago's 25 all season limit, and substantially lower than CSI's 50 bird all season limit.

Reducing the paradise shelduck limit during the main season

Reducing the paradise shelduck limit during the main season probably is reasonable, as it normally is not the target species then; rather it generally is targeted in the summer.

Reducing the summer season limit for paradise shelduck in Area B

The summer season limit for paradise shelduck has been higher in Area B because that traditionally is where the higher number of birds has been. Indeed, until 2015 there was no summer season in Area A, and a brief history lesson is appropriate here.

In the 19<sup>th</sup> century, large numbers of waterfowl including paradise shelduck, scaup, brown teal and grey duck were harvested from lowland waterbodies such as Lake Ellesmere. There were no mallards because they weren't acclimatised until the 1950s, and grey teal were only beginning their self-introduction. Overharvesting caused by a lack of regulations and market gunning led to brown teal becoming almost extinct throughout the country, and paradise shelduck and scaup restricted to the South Island high country. When I began duck shooting in the mid-1970s those two species were non-existent on the Plains and lowland waterways. However, in the intervening 50 years, they have gradually re-colonised those areas, beginning with the Plains. I first saw both species in Christchurch in the early 1990s. Since then they have continued to expand and the numbers have steadily progressed to quite a high level. A summer season for Area B was introduced in the late 1990s, and that was extended to Area A in 2015. Now shelduck numbers in Area A are anecdotally as high as in some parts of Area B. As for greylards, it appears that the current level of hunting is not substantially reducing their population, and I agree that there is no justification for differing bag limits between the areas. However, rather than reducing the bag limit in Area B, a better argument might be made for increasing the bag limit in Area A to 20.

Shortening the main paradise shelduck season in Area B.

For the same reason, it might be better to extend the paradise shelduck season in Area A, and remove the limitations on the hunting location.

In addition, shortening the season would appear to be contrary to one of the Council's regulation-setting criteria; namely promoting participation, since it reduces the potential to participate in shelduck hunting. The fact that people might not participate at one time does not mean that they do not want the opportunity to do so; it might

simply be that there have been other constraints such as work or family commitments, or the lack of a hunting location. It's a bit like having the right to vote. Many people will not exercise that right, but they still will want to have *the opportunity* to do so.

Reducing the pukeko season length.

I acknowledge that the rationale for shortening the pukeko season until the end of August is reasonable, because while the pukeko is technically a waterfowl, it is more commonly hunted over land.

Finally, I'd like to thank you for having the opportunity to air my views on these matters, and I hope that this submission aids you in your decision making. Keep up the good work.

I totally disagree with the proposed reduction in bird limits.

There is not science behind this proposal and the reasons given are woke ,unjustifiable rubbish to please people that don't want us to shoot any birds never mind less birds.

I purchase a game bird licence , not a social licence , and if the council doesn't wake up to the fact that it is people like me that pay Fishandgames way then you to will go down the same road as meany other useless organisations that failed to listen to their audience.

Tim McClintock.

## Submission to proposed changes to our Gamebird hunting limits

I refer to the article in the Fish and Game New Zealand magazine special edition 58 by your staffer Matt Garrick. This was the first inkling that I've had of how drastically wrong our game bird hunting is in North Canterbury that you are wanting to slash and burn our hunting opportunities by as much as 50%

I have heard that these proposals were attempted to be pushed through for our current game bird hunting season, luckily their minister rejected them. Staff were told to go back and consult with the stakeholders, Those being

- Current game bird licence holders
- Owner/occupier licence exempt game bird hunters

I see a little attempt to consult with the game bird hunters other than letting us know what you propose to do in this magazine article. The gamebird committee has been left by the way side. This would have been an ideal platform for consultation with stakeholders

The three points to justify the proposal to reduce hunters harvest opportunity are all fundamentally flawed!!

### 1/ Political licence/correctness

Wisely Fish and Game at National level (pg. 44 of the same magazine) are promoting hunting and fishing activities by advocating for the rewilding NZ campaign. 150+ years of Fishing and Hunting here by Europeans and Māori pre Europeans is all of our legacy. Many of us hold this dearly to our heritage. The acclimatisation groups were a very determine bunch. They laid the corner stones for what we reap today. We do not want to follow other countries like the US and Australia to where their waterfowl hunting opportunities are degrading to.

We even have a Minister of Hunting and Fishing (article page 50 of the same magazine), Todd McLay whom is enthusiastically promoting our cause.

2/ I don't agree that we have excessive bag limits. Population trend counts use to suggest that these limits are not reducing gamebird populations. Are we still Monitoring our waterfowl gamebirds. In the Cheviot area, the parry population has Remained steady over the past 15 years, however their summer moulting sites Have changed depending on open water and availability of feed to it Farm development through on farm water storage and establishment of high quality pasture crops to markedly improve milk production from cows and or lamb production also tick the boxes for our two most prevalent gamebirds – Mallards and Paradise Shelduck ( our native Goose!!)

We as hunters and managers of these gamebirds have a responsibility to the farming communities to control concentrated populations. Hunting currently provides this control, I don't want to see a degradation to culls by illegal poisoning or moult culls of

our gamebirds – “Canadian Geese are a prime example of Fish and Game failed management in the past.”

3/ I see Game bird harvest data as a poor assessment to be making hunter satisfaction conclusions. How many non-licenced owner/occupiers do these surveys cover, or don't they count! They do, they provide some of the best hunting opportunities for a large proportion of gamebird licence holders. Another group not covered by your surveys are out of the region hunters that come to enjoy our generous gamebird hunting opportunities.

4/ The palatability of reducing hunting harvest from population collapse due to disease is something we would have to face if it ever happens. As with the Salmon Fishery, Fish and Game demise may rapidly follow.

5/ Fish and Game ethos is to Promote and Enhance the fishing and hunting opportunities for its stakeholders.

We are not here to pander to fringe extremist groups like Safe and the Green Party. Are we doing our best to advocate for our hunters. I believe E.C.A.N. recently walked all over us in stopping historical hunting rights in a public riverbed at Coutts Island. We seem to want to go to great lengths to smooth over average historical management practices within Fish and Game by hammering our stakeholders – We will determine our destiny!

So ,in summary, I propose that we:

- Leave the aggregate bag of mallards etc for opening weekend in May @ 25 birds
- Leave summer Parry season at 20 birds a day for six weeks Feb/March
- Leave the Parry limit at 20 for the Winter season
- Close the Mallard Duck summer season
- Close the August/September Parry season.

I wish to speak to this submission if the opportunity arises.

Anthony Gascoyne

1)With reference to change to the set opening Weekend greylard bag limit to 15

My recommendation is to set limit at 20 trying to keep it simple

2)Set regular season paradise shelduck to 15

I suggest keeping the limit at 20 do not change areas numbers

3)Set summer season paradise shelduck limit to 15 in area B

Keep limit at 20

4)Align the end of the paradise shelduck regular season in area B to the end of July

Some people like to shoot Paradise ducks so I think it should be extended to the end of September

kind regards  
Mark Hubbard

## **Submission Against Proposed Changes to North Canterbury Game Bird Regulations**

To Whom It May Concern,

I am writing to address the proposed changes to game bird hunting regulations in North Canterbury, specifically the reduction in bag limits. After reviewing the available data and considering the current economic climate, I believe these changes are ill-advised and will have unintended negative consequences. I would like to present the following points for your consideration:

### **1. Inconsistency with North Canterbury Trend Data**

The "2021 National Gamebird Harvest Survey Summary" provides a comprehensive overview of game bird populations across New Zealand. North Canterbury data indicates that, overall, duck populations in North Canterbury are not in decline, therefore the proposed reduction in bag limits does not align with these trends.

- **Local Population Trends:** The trend data for North Canterbury specifically shows that duck populations are stable or even improving in some areas post the decline in 2012. The survey results suggest that current management practices are effective and that duck populations are not under significant threat. Implementing stricter bag limits, despite these positive trends, appears inconsistent with this data. Such measures could be viewed as premature and not reflective of the actual population status in North Canterbury.
- **Ecological Balance:** The proposed regulations do not account for the regional variability in duck populations. North Canterbury might experience localised fluctuations, but the overall trend indicates stability. A one-size-fits-all approach, such as reducing bag limits uniformly, fails to recognise these nuances and may not address specific local conditions effectively.

### **2. Impact on Hunting Opportunities and Duck Populations**

Given the stability of duck populations in North Canterbury, lowering bag limits would effectively reduce hunting opportunities on days when conditions are optimal, such as during favourable weather or migration patterns. This approach is counterproductive for several reasons:

- **Reduced Hunting Opportunities:** Hunters often have limited windows of opportunity to hunt due to various factors, including work schedules, weather conditions, and other commitments. By imposing stricter bag limits, especially when duck numbers are stable, hunters are constrained in their ability to make the most of these optimal conditions. This not only diminishes their overall hunting experience but also limits their ability to manage duck populations effectively during peak days throughout the season.
- **Potential for Overpopulation:** With a reduction in bag limits, hunters might be less able to address localised overpopulation issues. In areas where duck populations are thriving,



fewer hunters may lead to increased duck numbers, which can cause habitat degradation and competition for resources as we have noted that duck numbers are stable or on the increase. An approach that aligns with actual population trends would be more effective.

### 3. Economic Impact of High Interest Rates and Cost of Living

The current economic climate, characterised by high interest rates and a high cost of living, has significantly impacted disposable incomes across New Zealand. This economic strain has led to a notable decline in the sales of hunting gear and firearms. The proposed regulatory changes will exacerbate these economic challenges in several ways:

- **Decline in Sales:** The increased cost of living and high interest rates have already caused a downturn in the hunting gear and firearms market. Lowering bag limits could further dissuade potential hunters from investing in new equipment or continuing their participation in the sport. This decline in sales hurts local retailers and manufacturers, many of whom are only beginning to recover from previous economic downturns.
- **Further Industry Strain:** The hunting industry is facing a challenging period as the economy starts to recover. By imposing stricter regulations and reducing hunting opportunities, the proposed changes could lead to a further decline in hunting-related expenditures. This would not only impact businesses but could also result in job losses and reduced economic activity in regions reliant on hunting tourism and sales.

### 4. Importance of Data-Driven Management

**Duck Population Trends:** The primary focus of hunting regulations should be on the health and stability of duck populations. According to the "2021 National Gamebird Harvest Survey Summary," duck populations in North Canterbury are stable or improving. Effective regulation should be informed by such data, which provides an objective basis for managing hunting practices to ensure sustainability.

**Sustainable Hunting Practices:** Sustainable hunting relies on evidence-based management strategies that balance hunting pressures with the ability of duck populations to replenish and thrive. Regulations based on actual population data and trends ensure that hunting is conducted in a manner that does not jeopardise the long-term viability of the species. By focusing on data, we can maintain a healthy population and prevent overexploitation, rather than relying on subjective assessments of hunting practices.

### 5. Distinguishing Between Data and Perception

**Public Perception vs. Scientific Data:** Decisions driven by public perception of ethical behaviour and social licence can lead to regulations that do not reflect the actual status of duck populations. While ethical considerations and social licence are important, they should not override scientific data that indicates the health of wildlife populations. Basing regulations

primarily on perception rather than evidence can result in measures that are either too restrictive or not sufficiently protective, potentially harming both the ducks and the hunting community.

**Objective Management:** Relying on trend data and scientific assessments ensures that regulations are fair and grounded in reality. This approach avoids the pitfalls of fluctuating public opinions, which can be influenced by misinformation or emotional responses rather than factual evidence. Objective management allows for consistent and reliable regulation that can be adjusted as needed based on real data, rather than the variable nature of public sentiment.

## **6. Balancing Ethical Considerations with Practicality**

**Ethical Behaviour:** Ethical considerations are crucial in shaping hunting practices and ensuring that they align with broader conservation goals. However, these considerations should complement, not replace, data-driven management. It is possible to maintain ethical standards while also ensuring that regulations are grounded in scientific evidence.

**Social Licence:** Maintaining a social licence to hunt involves demonstrating responsible and sustainable practices. While public perception is important for ensuring that hunting remains socially acceptable, it should not be the sole driver of regulatory changes. Instead, regulatory decisions should balance public concerns with scientific data to uphold both ethical standards and effective wildlife management.

## **Conclusion**

In summary, the proposed reduction in bag limits for duck hunting in North Canterbury is inconsistent with the trend data showing stable or improving duck populations as reported in the "2021 National Gamebird Harvest Survey Summary." Such a reduction does not align with the current population trends and risks imposing undue restrictions that do not reflect the actual conditions. Lowering bag limits undermines the ability of hunters to capitalise on favourable conditions and manage duck populations effectively. Furthermore, the economic pressures stemming from high interest rates and the cost of living are already straining the hunting industry. Reducing hunting opportunities will exacerbate these economic challenges and impact the industry further. Decisions regarding hunting regulations should be primarily based on scientific data about duck populations and sustainability, rather than solely on public perceptions of ethical behaviour and social licence. A more balanced approach, considering both ecological data and economic realities, is essential to ensure that regulations support the long-term health of duck populations while also addressing the needs of the hunting community. I urge you to reconsider the proposed changes and adopt a more evidence-based and economically mindful approach.

Thank you for considering these points in your review process.

Sincerely,

Thomas Lanazue