

20 December 2017

Gordon George  
President  
Lower North Island Red Deer Foundation  
PO Box 40226  
Upper Hutt

Dear Gordon

I am writing to you in response to your letter of 10<sup>th</sup> December 2017 on issues relating to WARO permit renewal, and the correspondence from Derrick Field and Ian Patterson received by the Department since the 27<sup>th</sup> November combined WARO/recreational hunter meeting held in Palmerston North.

Firstly, I want to acknowledge the attendance by Derrick Field and Ian Patterson at the Palmerston North meeting. I understand there was a useful exchange of information and perspectives among the industry and recreational hunting sectors present and DOC staff. Thank you also for the additional comments and information received from Derrick and Ian following that meeting. The clear articulation of LNIRDF's preferred approach to the permitting system, and the results of the survey you have undertaken of Ruahine hunters will provide very useful input into our processes and decisions. The 29<sup>th</sup> November letter from Derrick will be included with the notes distributed to meeting attendees as has been requested.

In your letter you have expressed the view that the Department has failed to undertake undertakings to recreational hunters and the High Court in relation to a wider review of the WARO concessions system.

The Department initiated this series of meetings in order to engage with both the WARO industry and recreational hunters, and to gain a better understand of current issues with the WARO management system from each group's perspective.

At our recent meetings, which involved a broad cross section of the WARO industry and range of deer hunter representatives, we did not hear the same level of concern with the current system as you have expressed in your letter. The key issues expressed by WARO operators and processors, that impact on the sustainability

of their industry, were the permit duration and the 2 km buffer zone requiring landowner declarations.

We did hear a range of concerns from recreational hunters around the impacts of WARO on their interests, however these concerns were generally localised, or historic in nature. There were a number of anecdotal comments suggesting increased deer numbers in various areas and comments that there are 'plenty of deer for everyone'. There was discussion around how the 2km buffer zone that, while problematic for WARO operators, can work effectively to allow recreational hunters access to hunting areas close to road ends. A number of the recreational hunter representatives were interested to learn more about the level of regulation in place through MPI, and the current DOC permit requirements, which together tightly constrain both the number and the operations of WARO operators. There was strong agreement among those present at the meetings that a sustainable WARO industry was desirable.

There was discussion on the outcome of the High Court case. The key lessons DOC took from this case was that:

- While DOC considers WARO as a national process, where there is significant change at a regional level, DOC should consult interested stakeholders in that region.
- CMSs and Management Plans are important considerations. If one of these suggests DOC will consult, DOC needs to do that.
- Consultation may be covered by other recent DOC public processes, if change is consistent with these, e.g. new CMSs or National Park Management Plans.
- Consultation does not always require full public notification. Where DOC can identify affected stakeholders DOC can do 'targeted consultation'.

From the three meetings DOC has just undertaken, taking in the views of a range of key stakeholders, we did not hear a compelling case for undertaking a further extensive process to review the entire WARO management system. Such a review would take considerable time and taxpayer investment, which is difficult to justify without a stronger problem definition than the Department has heard to date. We did hear about some regional scale issues regarding allocation of areas and timing. We believe these can be managed through the land assessment and permit review process.

We will be informing key stakeholders, including yourselves, about the next steps with the review of WARO permits in the new year. WARO permits are due to expire in the middle of next year so, as you will appreciate operators and processors are keen to understand what the future arrangements will be for their operations as soon as possible.

Yours sincerely

A handwritten signature in dark ink, appearing to read 'Mike Slater', written in a cursive style.

Mike Slater  
Deputy Director General, Operations