



# Permission Decision Support Document

## Application Details

Decision Maker	Sarah Owen, Director Office of Regulatory Services
Process	Consideration of applications for new Wild Animal Recovery Operations (WARO) Permits 'bulk offer'
Task Assignment	<a href="#">DOC-5428825</a>
Permission Type	WARO Permit

## Key Dates

Task Assignment assigned	19 March 2018
Context Meeting	Unknown
Check-In Meeting	A number over the years
Decision due	End August 2023

## Resources

Permissions Advisor	Initially Jennifer Williams, then Daniel Lincoln and now Carl Jones
District Office/s	District Offices nationally were consulted during the land schedule review. Permits are considered in accordance with the outcome of that review and other concerns that could be addressed by permit conditions.
Science, Policy etc.	Technical - Threats, Legal, GIS, Wild Animal Management Team

## 1. Purpose

To make a decision on the:

- a) applications for new national Wild Animal Recovery Operations (WARO) ‘bulk offer’ permits; and
- b) proposed WARO permit template terms and conditions.

## 2. Context

The activity of searching for, shooting and recovery of wild animals (or any part thereof) using aircraft, falls within the definition of WARO under the Wild Animal Control Act 1977 (WACA). Commercial operators seek to supply certain wild animal carcasses (mainly deer) to Ministry for Primary Industries (MPI) authorised meat processors for human and pet food consumption.

To undertake WARO on Public Conservation Land (PCL), a concession is required under s22 of the WACA, considered in accordance with the matters specified in that Act and Part 3B of the Conservation Act 1987 (CA). Commercial operators can apply at any time and given the length of term and likely level of effects, processing of such applications is unlikely to require public notification.

Given the number of operators, the land area across New Zealand, number of Conservation Management Strategies (CMS) involved and the potential effects on others, particularly recreational hunters that pursue the same wild animals, the Department seeks to:

- avoid repetitive applications and increase processing efficiency;
- facilitate targeted stakeholder input;
- ensure consistency of assessment and decision making; and
- reduce associated processing costs to operators given the wild animal control ‘public good’ by establishing a ‘bulk offer’ process since 2009.

This process invites applications simultaneously and offers permits of the same term. It includes the opportunity for stakeholder consultation on a proposed national WARO land schedule of PCL (split into the North and South Islands) that specifies where and when WARO can take place.

The last ‘bulk offer’ concession ran from 2015 and expired on June 30<sup>th</sup> 2018, after which the current review of the land schedule began. Applications for short term ‘interim’ permits were also invited and granted on 1 July 2018 to enable existing concessionaires to continue operating whilst long term permit applications were received and considered in conjunction with the land schedule review. This is consistent with s17ZAA of the CA, where an application is made for the same or similar activity, existing concessions can continue until new applications are decided.

The 2018 land schedule review stalled in late 2019 due to staff changes and continued from early 2022. A new schedule was approved on 1 June 2023, as set out in the report dated 8 August 2022 (re-submitted 14 April 2023) [DOC-6987011](#). Submitters and applicants were informed of the

outcome and the report and supporting information placed on the Department’s website. The 2023 national land schedule does not become active until taken up by approved applicants.

Consequently, ‘long term’ applications and new permit terms and conditions can now be considered and, where approved, complying applicants offered new permits in accordance with the 2023 schedule. There are 35 national WARO concession applications dating from 2018 and 4 received since 2020, as listed in Appendix 3. Thirty-three applications seek the South Island land schedule, fourteen applications seek the North Island land schedule (some seek both).

A decision on applications for new national WARO permits is now long overdue. This report details the:

- applications received;
- matters to consider, including feedback from the land schedule consultation;
- proposed new permit template terms and conditions; and
- recommendations for consideration.

### 3. Consultation With:

#### a. Treaty Partners

Consultation with Treaty partners on whether to permit, restrict or not permit WARO on PCL within their rohe, was undertaken as part of the national land schedule review and site-specific feedback considered within the associated report dated 8 August 2022 (re-submitted 14 April 2023) [DOC-6987011](#).

#### **Analysis of the Principles of the Treaty of Waitangi**

##### **Carl Jones, Permissions Advisor**

Section 4 of the Conservation Act 1987 states ‘This Act shall be so interpreted and administered as to give effect to the principles of the Treaty of Waitangi’.

The key [principles](#) of the Treaty of Waitangi that apply to DOC’s work are:

1. Partnership – mutual good faith and reasonableness: The Crown and Māori must act towards each other reasonably and in good faith;
2. Informed decision-making: Both the Crown and Māori need to be well informed of the other’s interests and views;
3. Active protection: The Crown must actively protect Māori interests retained under the Treaty as part of the promises made in the Treaty for the right to govern;
4. Redress and reconciliation: The Treaty relationship should include processes to address differences of view between the Crown and Māori.

##### **Discussion:**

##### **Partnership**

The Department and iwi have worked together in partnership to come up with triggers documents and other agreements that reflect when and how consultation is required. The

agreements ensure informed decision making and active protection of Māori interests. More specifically in relation to these applications, the relevant Treaty Partners are all the iwi potentially affected and that have been consulted on the WARO land schedule review as set out in the associated report dated 8 August 2022.

### **Informed Decision Making**

Triggers documents, other agreements and consultation on the WARO land schedule review, ensure informed decision making and active protection of Māori interests. District Offices and regional statutory managers determined the appropriate means of iwi consultation. Feedback from iwi on the WARO land schedule review has been considered and appropriate recommendations made. Concession applications approved and permits issued in accordance with the recently approved land schedule, therefore, are judged to have taken iwi views into account and so do not require further consultation.

### **Active Protection**

Following feedback from iwi, sensitive sites and other areas under Treaty process were removed from the land schedule and other restrictions included where appropriate.

### **Redress and Reconciliation**

Treaty settlements that are in place, or soon to be signed, and that would have a bearing on the WARO land schedule access status, have been considered and affected land removed or protected as appropriate. Applications approved in accordance with the schedule should, therefore, not be in conflict.

It is, therefore, considered that Treaty Principles and the Department's Section 4 obligations have been met.

## **Statutory Analysis:**

### **Carl Jones, Senior Permissions Advisor**

#### **1. Wild Animal Control Act 1977**

s4 of the Wild Animal Control Act (WACA) states:

*“(1) This Act shall apply to all land [including Crown land]...and shall be for the purposes of controlling wild animals generally, and of eradicating wild animals locally where necessary and practicable, as dictated by proper land use.”...so as to:*

*“(2)...*

*(a) ensure concerted action against the damaging effects of wild animals on vegetation, soils, waters, and wildlife; and*

*(b) achieve co-ordination of hunting measures; and*

*(c) provide for the regulation of recreational hunting, commercial hunting, wild animal recovery operations, and the training and employment of staff.”*

A Wild Animal Recovery Operation is defined in section 2 (interpretation) of the WACA as:

*“The use of an aircraft (whether or not for hire or reward) to carry out one or more of the following activities:*

*(a) the searching for, shooting, or immobilising of wild animals:*

*(b) the recovering of wild animals (whether dead or alive) or any part of those wild animals:*

*(c) the carriage of persons, supplies, equipment, firearms, ammunition, poisons, or other things that may be used for the purpose of paragraph (a) or paragraph (b).”*

Wild animals are defined as:

*“(a)...*

*(i) any deer (including wapiti or moose):*

*(ii) any chamois or tahr:*

*(iii) any goat that is not—*

*(A) held behind effective fences or otherwise constrained; and*

*(B) identified in accordance with an animal identification device...or...system approved...for the purposes of this Act:*

*(iv) any pig that is living in a wild state and is not being herded or handled as a domestic animal or kept within an effective fence or enclosure for farming purposes:*

*(v) any member of any species or class of land mammals that the Governor-General may from time to time, by Order in Council, declare to be wild animals for the purposes of this Act...; and*

*(b) includes the whole or any part of the carcass of any such animal:*

*(c) ...*

*(d) does not include an animal that is part of a herd designated to be a herd of special interest under section 16 of the Game Animal Council Act 2013.”*

‘WARO’ was initially used by the Department for all activities that met the definition of ‘wild animal recovery operation’ above. However, this changed in 2009 as the use of the WACA grew and additional clarity/distinction between the varying activities was requested. The activities were split into 5 different application ‘classes’ and processes as follows:

1. Wild Animal Recovery Operations (WARO)
2. Aerially Assisted Trophy Hunting (AATH)
3. Cape Recovery for taxidermy purposes
4. Live Capture and recovery
5. Tahr Carcass Recovery

Only class 1. WARO is relevant to this report and in relation to the following species, activities and schedule areas:

### North Island Schedule

Deer carcass recovery (all species)  
Live deer capture (all species)  
Pig and goat carcass recovery  
Live pig and goat capture

### South Island Schedule

Deer carcass recovery (all species)  
Live Deer capture (all species)  
Pig, goat, and chamois carcass recovery only

Two concession contract template documents have been created to cater for the differences in species, activity and access restrictions that apply between the islands.

## **Part 2 - Sections 21, 22 & 23**

Concessions for WARO on public conservation land are dealt with under Part 2 of the Wild Animal Control Act. Part 2, sections 21 and 22 provide the power for the Minister to grant WARO concessions, with the matters to which the decision-maker must have regard set out in section 23.

Criteria for decision:

- Is the activity consistent with sections 22 and 23 of the Wild Animal Control Act?

Yes

### Discussion

#### **Section 21**

This section sets out the purpose of Part 2 which is to provide for the granting of concessions for wild animal recovery operations on certain land (including PCL), apply the provisions of Part 3B of the CA 1987 for the purpose of granting those concessions, including having regard to the provisions of the Act under which the land is held, the purposes for which that land is held and the purposes of the WACA.

#### **Section 22**

This section states that the Minister has exclusive authority to grant concessions for WARO over Crown-owned land (including conservation areas, national parks, reserves and wildlife areas), so long as the granting of a concession under this section is done in accordance with Part 3B of the Conservation Act 1987 (CA 1987).

To fully understand whether proposed concessions are consistent with Section 22, an assessment of Part 3B must occur. Section 17U(3) is excluded from the assessment of Part 3B as it has been altered and inserted into Section 23 (a) to (b) of the WACA. This is because section 17U(3), as it stands under the CA, prevents concessions being granted where the proposed activity is contrary to the purposes for which the land is held. Under the WACA, the s4 purpose to control wild animals has primacy and so WARO activity can be authorised in, for example, Wilderness Areas where motorised aircraft are generally prohibited.

#### **Section 23**

When considering a concession application, in addition to s17U Conservation Act, the Minister must have regard to:

23(a) the provisions of the Act under which the land concerned is held and the purposes for which that land is held;

This assessment has been undertaken during the associated consultation on and approval of changes to the national WARO land schedule detailed in the report of 8 August 2022. In summary, all purposes have aspects of preservation or protection of intrinsic values and WARO contributes to this by removing browsing ungulates, particularly deer, which damage native vegetation and potentially cause habitat loss and ecosystem modification.

Applications for parts, or all, of the national WARO land schedule, and granted in accordance with it, therefore, are consistent with the purpose for which the land is held.

23(b) the purposes of this Act;

The purpose of the Wild Animal Control Act is set out in section 4(1):

*“(1) This Act shall apply to all land, having regard to the provisions of any Act applying to the land, and shall be for the purposes of controlling wild animals generally, and of eradicating wild animals locally where necessary and practicable, as dictated by proper land use.*

*(2) This Act shall be administered, having regard to the general purposes specified in subsection (1), so as to—*

*(a) ensure concerted action against the damaging effects of wild animals on vegetation, soils, waters, and wildlife; and*

*(b) achieve co-ordination of hunting measures; and*

*(c) provide for the regulation of recreational hunting, commercial hunting, wild animal recovery operations, and the training and employment of staff.”*

Issuing concessions to allow commercial WARO over PCL contributes to concerted action to control certain wild animals at certain times in certain places. The recently approved national WARO land schedule 2023 and proposed standard and special permit conditions (set out in Appendix 2), nationally regulates the activity by broadly coordinating when and where WARO effort can occur, relative to other control means, and avoiding, mitigating or minimising adverse effects. Approving WARO activity, in this way, is considered consistent with the WACA.

23(c) the role of persons engaged in hunting for recreation in achieving the purposes of this Act.

The role of recreational hunters is recognised by and has been considered following consultation on and approval of the 2023 national WARO land schedule, as detailed in the report of 8 August 2022 (re-submitted 14 April 2023). The land schedule, in combination with the proposed standard and special permit conditions (set out in Appendix 2), restricts WARO in certain places and at certain times e.g. seasonally and during the roar and Christmas periods. This minimises the potential disincentive and adverse effects (actual or perceived) of WARO on recreational hunters.

**Part 3** – section 27(1) provides for the declaration of Recreational Hunting Areas (RHAs) where hunting as a means of recreation is to be used to control (though not necessarily exclusively)

the numbers of wild animals. The approved land schedule does not propose WARO activity in any gazetted Recreational Hunting Area.

## **2. Game Animal Council Act 2013**

Section 16 of the Game Animal Council Act 2013 provides for the designation of any species of game animal in a specified area on public conservation land to be a herd of special interest. The definition of “wild animal” in the Wild Animal Control Act excludes an animal that is part of a herd designated to be a herd of special interest under section 16 of the Game Animal Council Act. To date, no herds of special interest have been designated. WARO permits will not apply to a herd of special interest, should such a designation come into effect, during the term of any WARO permit.

## **3. Conservation Act 1987 – Consideration of Public Notification of Applications**

In considering the granting of a concession under the WACA, the Minister must have regard to certain matters, including those under Part 3B of the CA (except subsection to s17U (3)):

### **S17SC: Public Notification**

The concession applications must be publicly notified if they meet any of the following criteria:

- The concession type is a lease – this is for exclusive use of public conservation land;
- The term of the concession exceeds ten years (unless it is an easement – an easement may be granted for a term exceeding ten years without public notification);
- The effects of the activity mean it is appropriate to do so.

### **Criteria for decision:**

- Is public notification required?

No

### **Discussion:**

The proposed permits are not leases and do not exceed 10 years term and the nature and effects of WARO activities are well known (see S17(U) analysis below). Stakeholder feedback was invited and considered on the review of the national WARO land schedule. The feedback included permit related comments that have been considered in Section 5 below. WARO activity has also been considered as part of publicly notified statutory planning processes, such as conservation management strategies, and the recommendations implement the outcomes of those processes.

Consequently, public notification under s17SC of the Conservation Act is not triggered or considered necessary to decide on the WARO permit applications.



## S17U(1) and (2) Analysis of effects

Considering:

*(1) (a) the nature of the activity*

*(b) the effects of the activity*

*(c) any measures that can reasonably and practicably be undertaken to avoid, remedy, or mitigate any adverse effects of the activity*

*(d) any information received within the application or by further request or in a report commissioned by Minister*

*(e) any relevant environmental impact assessment*

...

*(2) The Minister may decline any application if the Minister considers that—*

*(a) the information available is insufficient or inadequate to enable him or her to assess the effects (including the effects of any proposed methods to avoid, remedy, or mitigate the adverse effects) of any activity, structure, or facility; or*

*(b) there are no adequate methods or no reasonable methods for remedying, avoiding, or mitigating the adverse effects of the activity*

...

*(8) Nothing in this Act or any other Act requires the Minister to grant any concession if he or she considers that the grant of a concession is inappropriate in the circumstances of the particular application having regard to the matters set out in this section.*

Criteria for decision:

- Is the activity consistent with S17U(1) and (2) of the Conservation Act?

Yes

### Discussion

WARO has been occurring over public conservation land since the 1960s. The effects on other users, particularly recreational hunters, are, generally, consistently aired through consultation over the years. The most recent consultation raises similar issues, but with some variations relative to changed circumstances at place, as detailed in the report of 8 August 2022 (re-submitted 14 April 2023) [DOC-6987011](#). Effects on conservation values are also well-known although not particularly well quantified in terms of ungulate levels and vegetation type due to data collection limitations.

Adverse effects include:

- disturbance to natural quiet;
- concerns around public safety (although no record of actual harm is known unlike recreational hunting where prosecutions have occurred);
- actual and perceived disturbance to recreational hunts and other users;
- disincentivised recreational hunting effort due to actual or perceived general loss of resource, particularly stags ; and
- other users finding concentrated dumping of ‘gut bags’.

How such effects can be avoided, mitigated and minimised, compared to the need to facilitate appropriate concerted WARO, has been considered resulting in access limitations within the approved 2023 national land schedule and the proposed standard and special conditions within the permit templates in Appendix 2. For example, conditions require concessionaires to not fly during hours of darkness, avoid, where possible, overflying general tramping routes, tracks and other visitor facilities, to avoid flying within 500m of great walks and other sensitive sites, to only land if a site is clear of other users and to not leave 'gut bags' or similar animal bodily waste within 50 metres of any water body, water source, track, road, hut, or any other place likely to be used by members of the public.

A new proposed condition will now allow the use of thermal imaging and similar equipment during daylight hours. Advances in such technology enables the locating of target wild animals more quickly within the landscape. Quicker location results in reduced flight times, noise and fuel consumption.

### **S17W: Relationship between concessions and management planning documents**

A concession shall not be granted unless the proposed activity is consistent with the Conservation General Policy and/or General Policy for National Parks, and established conservation management strategy, conservation management plan, and/or national park management plan.

#### **Criteria for decision:**

- Is the activity consistent with all relevant statutory planning documents including the relevant General Policy/Policies?

Yes

#### Discussion

##### **Conservation General Policy 2005**

Section 4 of the General Policy covers the conservation of natural resources. Specific policies within this section deal with biosecurity and the management of threats to habitats and ecosystems. Those policies covering the management of wild animals are:

- 4.2 (e) Commercial hunting of wild animals and animal pests should be encouraged to maximise the effective control of them, while minimising any adverse effects of hunting on planned outcomes at places.
- 4.2 (f) Recreational hunting of wild animals and animal pests should be encouraged where this does not diminish the effectiveness of operations to control them and is consistent with planned outcomes at places.

##### **General Policy for National Parks 2005**

The General Policy for National Parks 2005 (GPNP) gives direction and guidance on how to preserve and protect national parks and the indigenous species in them. Conservation management strategies and national park management plans must be consistent with the

GPNP, although existing strategies and plans will continue to have effect until they are amended or superseded (except where they clearly derogate from the 2005 GPNP). The GPNP policies covering management of wild animals are:

- 4.3(i) Commercial hunting of wild animals and animal pests should be encouraged to maximise the effective control of them, while minimising any adverse effects of hunting on planned outcomes at places.
- 4.3(j) Recreational hunting of wild animals and animal pests should be encouraged where this does not diminish the effectiveness of operations to control them and is consistent with planned outcomes at places.

### **Management planning documents**

The Department's review of the national WARO land schedule, detailed in the report of 8 August 2022 (re-submitted 14 April 2023), considered whether WARO should be "permitted", "restricted" or "not permitted" on a range of PCL under review. This included regional office input and 'panel' assessment against established statutory management plan policies and outcomes for place. Land access recommendations have been made in accordance with, or not inconsistent with, those plans, as required, but sometimes the 'panel' noted tension between plan policies at place, the WACA, under which WARO permits are potentially granted, and CGP and GPNP that also encourage recreational hunting and WARO in order to maximise the effective control of wild animals.

The tension is due to the age of some CMS and more recent 'place'-specific policies that prioritise recreational hunting over WARO (outside of RHAs) for the duration of the plan unless it can be shown that recreational hunting isn't effective. Decision makers must have regard to the role of and effects on recreational hunters, and certain land classification may help support prioritisation, but this does not necessarily equate to a 'veto' of or priority over WARO year-round in most places. Periodic exclusivity/priority can be sufficient to manage effects without diminishing control. A 'fixed' preference for recreational hunting, without adequate monitoring and analysis to justify, may not be consistent with the WACA.

This issue has also been raised by WARO operators but cannot be quickly addressed. General compliance with CMS provisions (that have been through a public statutory process) is the most prudent course for now, and proposed WARO data collection will help responses in the future but a check of plans is also recommended as a separate task assignment to reduce the instances where this tension may occur in the next review.

### **Other Considerations**

#### **Department of Conservation's Policy Statement on Deer Control 2001**

This policy statement provides a set of guiding principles for deer control and was developed, under the WACA, after extensive public consultation.

The over-riding goal for deer control is:

*"To reduce the impacts of deer, along with other threats, on public conservation lands so as to maintain and enhance forest regeneration and indigenous ecosystem protection."* (page 7).

*“There is no evidence that equilibrium has been reached between deer and the native ecosystems they inhabit. Deer continue to inhibit forest regeneration even at low density.” (page 5).*

The Policy states:

*“The department's first and over-riding concern is the protection of New Zealand's unique indigenous biodiversity, which takes precedence over the recreational and commercial value of deer as a hunting resource.*

*Role of commercial and recreational hunting*

*The department recognises that commercial and recreational hunters value deer as a hunting resource and that commercial hunting, in particular, provides effective control in those areas that are most suitable for hunting by helicopter.*

*Access for commercial and recreational hunters*

*The department will continue to encourage both commercial and recreational hunting on public conservation lands where this is consistent with management for conservation. Commercial and recreational hunters will generally have open access to public conservation lands.”*

**Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy 2020**

This NZ Government strategy (with DoC as the lead agency) outlines the decline of biodiversity in Aotearoa New Zealand and the causes and sets the direction for its protection, restoration and sustainable use, particularly of indigenous biodiversity. It identifies a suite of predators and browsers that have been introduced and which threaten many indigenous species including pigs, deer and goats whilst also recognising the recreational, economic, cultural and sustenance benefits of valued introduced species.

Objectives (2025-2050):

*“10. Ecosystems and species are protected, restored, resilient and connected from mountain tops to ocean depths*

*11. Management ensures that Biological threats and pressures are reduced through management.*

*11.1.1 The impacts of introduced browsers, including valued introduced species (pigs, deer, tahr and chamois), on indigenous biodiversity have been quantified, and plans for their active management have been developed with Treaty partners, whānau, hapū, iwi, Māori organisations and stakeholders.*

*11.1.2 Introduced browsers, including valued introduced species, are actively managed to reduce pressures on indigenous biodiversity and maintain cultural and recreational values.*

*11.1.3 Introduced browsers, including valued introduced species, have been removed from high priority biodiversity areas and threatened ecosystems and are under ongoing management elsewhere to maintain functioning ecosystems and cultural and recreational values...”*

This gives effect to Te Mana o te Taiao Aotearoa/New Zealand Biodiversity Strategy 2020 as an adaptive framework for managing goats, deer, pigs, tahr, and chamois. It advocates for an effective system of wild animal management by identifying the shifts required for a step change in performance:

*“Areas for development or improvement include:*

- Systems for knowledge, science, data, and innovation*
- Systems for prioritising action at place*
- Implementing roles and responsibilities to best effect under relevant legislation*
- Legal and policy tools to balance conservation, recreational and commercial interests in hunting.”*

**Note:** Section 5A of the WACA provides that nothing in any general policy is to derogate from any provision in that Act, the Conservation Act or any other Act. Only the Policy Statement on Deer Control is a policy adopted under the WACA and does not derogate from it. The other, albeit more recent documents, are NZ Government strategies. They should be read together and considered where they do not derogate, and to which WARO can contribute to the goals, but they are not the primary guiding documents under the WACA.

### **Health and Safety**

Legal consideration has also been given to whether the Minister, D-G or the Department is a “person or business conducting a business or undertaking” (PCBU) for the purpose of concession operations generally or WARO concessions more particularly. Advice concludes that they are not for the following reasons:

- Concessionaires are not the Minister’s contractors doing Departmental work, rather the Minister is authorising their activity on PCL as a regulator
- The Minister has no day-to-day control or knowledge of where and when the activity is being undertaken and so do not share a ‘workplace’; and
- Conditions within permits are intended to reduce conflict with other users of PCL and generally promote health and safety rather than specifically as a PCBU.

Similarly, there is no basis on which the Minister can require concessionaires to refrain from using certain legal equipment, such as Robinson Helicopters. Proposed conditions are limited to requiring Concessionaires to adhere to CAA rules and, where the Concessionaire is undertaking the Concession Activity using a Robinson R22 or R44 helicopter, updated to require the pilot in command of the aircraft to comply with any safety training requirements for those models of aircraft as may be issued by the Director of Civil Aviation from time to time.

WARO is prohibited from taking place during the hours of darkness and using night vision scopes. However, the same existing condition also bans the use of thermal imaging type equipment at any time, even though technological advances mean they can now help locate target animals, more quickly during daylight. Consequently, it is proposed to separate out this aspect and provide a new clause that allows for use of thermal imaging type equipment during daylight.

### **Applicant eligibility**

Operators may apply for the national WARO concession if they meet certain criteria, including:

1. Hold either a supply contract with an MPI approved processing facility or a supply contract with a marketing company (or equivalent) which uses an MPI approved processing facility for the processing of its product – and can demonstrate that link
2. Be listed as a certified supplier of wild animals to a primary processor in accordance with the Animal Products Act 1999 (APA); and
3. Be accepted by DOC as being of good character and having complied with departmental requirements for previous concessions.

Some applicants, particularly new ones, have enclosed good character references whilst other, existing operators, have no record of permit condition breaches in the Permissions Database, except for two. Hawkeye Helicopters Limited had a hard landing/crash in 2019, apparently due to a downdraught while manoeuvring to recover deer. There was no injury and all equipment/debris was removed. Wild Animal Management Ltd (WAM) have a record for inappropriate leaving of gut backs near a track and watercourse and fuel containers on a ridgeline. A warning was given to WAM and accepted with no further action taken or subsequent breaches.

Applications received in 2018 early stages of this process did include evidence to satisfy criteria 1. and 2. in particular. Because of the extended time it has taken to review the land schedule, most of this evidence has expired. A request for current evidence was sent to applicants on 7 July 2023 and many have provided but not all, so far. It is recommended that all applications be approved, and new permits be offered on condition of receiving current evidence where still necessary.

### **Off-loading to Chiller Trucks**

As was the case for the 2015 – 2018 concession, the proposed new national concession authorises aircraft to land in otherwise “not permitted” places that are legally accessible by motor vehicle to offload carcasses to chiller trucks. This exception is solely to allow for the efficient transfer of carcasses.

**See Section 5 for stakeholder comments, on monitoring, data collection and concession term, and ‘panel’ responses.**

## **4. Proposed Operating Conditions**

### **Conditions**

**Standard conditions applicable to the proposed activity:** see SI template [DOC-7407702](#) and NI template [DOC-7440174](#)

**Special conditions relevant to these applications:** see SI template [DOC-7407702](#) and NI template [DOC-7440174](#)

## Monitoring

Following monitoring, the Departments standard rates for staff time and mileage required to monitor the effects of the concession activity and compliance to the standard and special conditions will be invoiced.

## Term

A term of 5 years is recommended.

## Fees

### Processing fee:

Sec 9(2)(i) + GST for applications from concessionaires received in 2018 (as this was the fee applicable at that time).

Sec 9(2)(i) + GST for applications received in 2020 onwards.

### Management fee:

Sec 9(2)(i) + GST annually in arrears (consisting of Sec 9(2)(i) base rate + Sec 9(2)(i) fee review + Sec 9(2)(i) activity return handling fee).

Management fees are intended to cover the time that is being spent across the Department in the administration of a concession after it has been granted. The legislative basis for management fees is s60D Conservation Act.

### Activity fee: \$0.00 + GST

Section 17X(f)(i) of the Conservation Act 1987 provides for a waiver of rent where the concessionaire makes any contribution to the management of the lands or the public interest in those lands.

In accordance with the Pricing Policy, it is recommended that no activity fee be applied to these concessions in view of the wild animal control contribution the activity makes to the management of PCL at little cost to the taxpayer.

## 5. Stakeholder and Applicant Comments

### Comments received from Stakeholders and Applicants

The following summarises permit related comments, received from recreational hunters/hunting groups and WARO operators/groups, during consultation on the WARO land schedule review. Whilst, in many cases, beyond the scope of the land access consultation and not directly related to particular applications, they contain views that are important to acknowledge, understand and, where appropriate, incorporate when framing new permit terms and conditions:

### Monitoring and data recording

There is strong support amongst recreational hunters for more compliance monitoring of WARO and for stronger consequences for concession breaches. Submitters feel that the

Department should regularly review WARO activity on public conservation land, including making GPS waypoints or flight tracking data visible to the public to ensure compliance.

Amongst those directly involved in the industry, comments range from strong opposition to supplying DOC with waypoint &/or flight tracking data, often on the grounds of commercial sensitivity and data insecurity, to support from some as a means of providing greater evidence that vegetation quality improves where WARO happens and that deer numbers are not adequately controlled by recreational hunting alone.

No operators supported making flight tracking and kill waypoint data available to the public, in large part due to the commercial advantage this may give competing WARO operators.

Panel Comments

The Department wants to better manage compliance across all concessions using tools available within concession contracts and increased compliance monitoring. WARO is highly regulated both in terms of its MPI information requirements and concession operating conditions but it is acknowledge that there is a need to update and room for improvement.

For example, it is now proposed to require GPS flightpath and kill data, currently only supplied to meat processors, to be provided directly to the Department, so that it can better understand levels of ungulates at place, the effect on vegetation and the impact of WARO activity. Threats technical advisors have specified the data they wish to see, with parts A + B being their musts and C. their ideal:

- A. Animals recovered data elements;
  - i) Date removed (killed)
  - ii) Species Name (common name is usually used)
  - iii) Location (X/Y - NZTM co-ordinates); and
  - iv) Sex and Age, with age broken down into the following classes:

Ungulates Age/sex classes	
AM: Adult male (>2 yrs.)	YF: Yearling female (1-2 yrs.; not usually with young at foot)
AF: Adult female (>2 yrs., may have young at foot)	J: Juvenile (<1 yr.; usually seen with an AF)
YM: Yearling male (1-2 yrs.; 'spiker' for deer)	U: Unidentified

- B. Hunting effort data elements;
  - i) Flight paths for each operation - GPS file that is used to generate distance/area searched; and
  - ii) Flying hours (time (hh:mm)) - used to generate Hours of hunting effort.
- C. Number seen but not killed data elements;



- i) Species Name (common name is usually used)
- ii) Location (X/Y - NZTM co-ordinates); and
- iii) Sex/age - improvement but not essential.

The North and South Island WARO group representatives are comfortable where the information sought is the same as that already required to be provided to MPI processors or is directly related to their activity and requires minimal additional labour input. This applies to A. i) to iv) (except for age as discussed below) and B. i) and ii) (with a caveat discussed below).

The Permissions Advisor agrees proposed conditions must be directly related to the WARO activity and as required by MPI. All of part C. is not supported as this is survey work over and above the WARO activity applied for. Parts A. and B. are supported except for iv) (age classes). WARO representatives state that whilst some operators record stag or hind and yearling stag or hind, most do not and no other age class is recorded. Given the economic incentive to maximise hunt returns, it is also questionable how much data other classes would generate. With no data currently being provided to the Department, the Permissions Advisor believes a more onerous requirement should be left for further discussion during the next permit term. That said, identifying yearlings could be optional, as an interim step, so that some data can be collected from those that do differentiate anyway.

With regards flying hours of hunting effort, technical staff indicated that this would require operators to mark the start and end of each hunt. This would mean frequent stop/start GPS marking that may be inconsistently applied and has not been widely discussed with operators. The representatives with which it has been raised, have said that private and PCL based hunting work is kept separate and so flying time compared to wild animals killed should start and end at the helicopter bases.

Without time for further dialogue and agreement, it is suggested that an indication of flying time for animals killed be left to analysis of the GPS flight path data and kill locations that will be provided as already done to MPI.

The Department has established a secure email and process to receive data, remove operator information and aggregate for reporting so that it cannot be attributed to individual operators. This has alleviated some operator commercial and privacy concerns whilst making a big step forward in meeting the Department's need for more information to better understand the location and effects of wild animal levels and impact of control methods.

With respect to making 'activity returns' or flight data available on the Department's website, there is insufficient justification as to why this should be the case for WARO and not other activities. The data is commercially sensitive and a contractual matter between the applicant and the Department. This submission point is, therefore, not supported at all.

#### Conclusion:

It is recommended that the provision of data under points A and B, above, be a special condition within the new permit but with age differentiation limited to the option of declaring yearling stags or hinds from adults and hunter effort indicated from existing flight path and kill data requirements of MPI. C. numbers seen but not killed is not recommended.

### Permit Term

Feedback from recreational hunters (mainly) during consultation on the national WARO land schedule review argues for a three-year term or less to allow a full review of the WARO management model.

WARO operators want a longer term to facilitate business planning and investment and to enable skills and knowledge to be passed on to new staff, thereby increasing wild animal control effectiveness. A proposed 5-year term + 5 year right of renewal was a common submission but most applicants have specified a full 10 years (as shown the Appendix 3 table).

Meat processors also advocated for a longer term to give certainty of supply, as this is important to them when making processing and marketing commitments and investments.

### Panel Comments

The WARO management 'system' or 'model' is currently not under review. The Department has contracted an independent WARO problem identification analysis but a final report is yet to be received. The draft seen so far does not support wholesale change but contains recommendations of an engagement, resourcing and policy nature rather than 'quick wins' that can be incorporated into conditions. When the report is finalised, it will take time to consider such recommendations, enact where considered appropriate and develop improvements in discussion with others. Similarly, proposals to better accommodate the Te Ara ki Mua Framework, should be undertaken through those channels, outside the regulatory process.

WARO applicants are entitled to expect reasonably efficient processing of their applications in accordance with the Acts. The current process has already been significantly delayed, adding 5 years to the 'term' of the 2015 land schedule. To prevent a loss of faith in the 'bulk offer' process, and a return to individual applications that would risk losing input opportunities for the recreational sector, a decision is now recommended.

Whilst the economic needs of WARO operators are not a matter required to be considered under the WACA, ignoring that reality could potentially hinder business investment and staff training and so reduce the ability to undertake effective, concerted wild animal control contrary to the WACA's primary purpose. The Department also needs time to focus on other pressures it faces, including a legal assessment of some CMS recreational hunter prioritisation (outside of RHAs), and possible plan changes, and improvements to the regulatory system before resourcing another land schedule review in the short term. Consequently, a three-year term is considered insufficient.

At the same time, a 5 + 5 year or full 10-year term may overly hinder the Department's ability to respond in a timely manner to policy re-direction, resulting from analysis of proposed data collection, land status and other impacts or agreed management changes. Therefore, a term closer to 5+5 or 10 years is not recommended currently.

A 5-year term is considered a more justifiable balance, particularly when also taking into account proposed new special conditions that will allow the Department to temporarily 're-zone' land to WARO "Restricted" or "Not Permitted" for its land management reasons, with at least 5 days' written notice and without any liability for any loss by the concessionaire. Where

the reason for re-zoning ceases to apply, and there is no other reason to continue, the land will revert to the originally approved access status.

Finally, in recognition of the need to respond to:

- potential ‘problem identification’ recommendations;
- possible co-ordination and management improvements identified sooner; and
- the need to avoid significant regulatory processing delays next time round

it is suggested that a land schedule review could be undertaken during the latter part of a 5 year permit term rather than at the end.

Permanent land access charges arising from legislative or CMS changes, GAC herds of special interest declarations and WACA Recreational Hunting Areas, is also possible during the term.

Conclusion:

Given the above considerations, it is recommended that a 5-year term be approved.

## 6. Decision Making

### Recommendations

Thanks to stakeholder feedback, both recently and during WARO’s long-standing activity, the effects of WARO on PCL are well understood. The activity is conditionally supported, where appropriate, by the Department because of its assistance in controlling certain wild animals through concerted action in certain places.

The approved 2023 national WARO land schedule (discussed in the report of 8 August 2022/14 April 2023), supplemented by the proposed standard and special permit conditions discussed in this report, combine to broadly co-ordinate hunting effort nationally and minimise adverse effects, particularly on recreational hunters, while also meeting the purpose and requirements of legislation, policy and management planning documents.

Approving complying applications and offering WARO concessions over PCL, in accordance with the 2023 schedule, is consistent with the WACA and CA, the purpose for which the land is held, policy and management planning documents.

One possible exception is where some statutory management plans are significantly outdated or have ‘place’-specific policies, that prioritise recreational hunting over WARO (outside of RHAs), with insufficient data, resulting in inadequate wild animal control contrary to the WACA. An explore Task Assignment is recommended to examine the extent and soundness of this and for amendments to be implemented (where required) in time for consideration of future permits.

### **Decision: Non-Notified Concession under section 22 of the Wild Animal Control Act 1977 & Part 3B of the Conservation Act 1987**

1. Deem the applications listed in Appendix 3 to be complete in terms of s17S of the Conservation Act 1987:

Agree / ~~Disagree~~

2. Agree that it is not considered appropriate to give public notification, under s17SC of the Conservation Act 1987, of the applications listed in Appendix 3:

Agree / ~~Disagree~~

3. Approve the granting of non-notified WARO permits, under s22 of the Wild Animal Control Act 1977, for a term of 5 years, to the applicants listed in Appendix 3, subject to the standard contract and special conditions identified in Appendix 2 of this report and on condition of receipt of current MPI certification and processor supply evidence:

Approve / ~~Decline~~

4. Approve the new North and South Island national WARO contract templates linked in Appendix 2:

Approve / ~~Decline~~

5. Should any minor technical errors be subsequently identified, give approval for them to be corrected.

Approve / ~~Decline~~

Special conditions to be included:

*Decision Maker to list the condition numbers to be included, as per section 4 (Proposed Operating Conditions) of this report.*



Signed by Sarah Owen, Director Office of Regulatory Services  
Pursuant to the delegation dated 9 September 2015

15.09.2023

Date

#### **Decision Maker comments**

*Decision Maker to comment on the rationale behind their decision. If there is nothing contentious this can be brief, but if there are differing views between DOC staff and/or DOC and Treaty Partners, or there are multiple options available, or the decision made is different from what is recommended/requested, the rationale for the decision made must be clearly provided.*

*The Permissions Advisor will share the rationale for the decision with team members.*

## Appendix 1 - Key National WARO Permit Changes

- Schedule 1 descriptions of Land and Concession Activity have been revised and updated.
- Schedule 1 Item 9 standard Monitoring Cost wording added.
- Schedule 2 – general conditions, revisions have been made to clauses 1, 2 (renewal), 3 (processing fee), 4 (updated MPI references), 7 (compliance), 8 (suspension), 10 (dispute resolution), 11 (assignment)
- Schedule 2 – clause 4.1, protection of environment – added a new requirement around appropriate dumping of ‘gut bags’
- Schedule 2 – clause 4.5, new provision relating to the adoption of new technology
- Schedule 2 – clause 10 amendment of dispute resolution section.
- Schedule 2 – clause 15 Concession Activity has been removed from Schedule 2 and shifted to Schedule 3
- Schedule 3 – conditions 1-3, 7-13 based on previous schedule 2 clause 15.
- Schedule 3 – conditions 4 and 5 address night prohibition and allow for use of thermal imaging equipment during daytime
- Schedule 3 – condition 6 addresses additional Arms Act requirements now in place
- Schedule 3 – condition 10 is a new condition addressing additional training requirements to use Robinson R22 and R44 aircraft
- Schedule 3 – conditions 20-22 provide for temporary, place specific rezoning, with written notice, both to restrict/exclude or include areas of Land for WARO activity, to facilitate Departmental land management purposes. This is not a general WARO land schedule review
- Schedule 3 – conditions 23 – 29 Information requirements have been revised, consolidated and updated. Primarily MPI related flightpath and kill data now required to be sent to the Department for compliance, monitoring, and conservation management purposes
- Schedule 3 – previous condition 39 re para (g) concession activity notification has been deleted as it has not been enforced and we are not aware of any complaints
- Schedule 3 – condition 35 new condition to allow monitoring by the Department
- Schedule 4 – revised standard closure dates assuming 5-year term is granted
- Schedule 5 – amended place specific restrictions arising from land schedule review/CMS changes, Pike River anniversary in Paparoa National Park and other matters

## Appendix 2 - Proposed National WARO Contract Template

Proposed North Island National WARO Contract Template = [DOC-7440174](#)

Proposed South Island National WARO Contract Template = [DOC-7407702](#)

## Appendix 3

### North Island Land Schedule Concession Applications

Applicant	Existing Status	Long term application DOC ref.	Long term application WARS ref.	Application Received	Term Sought (yrs)	Other Comments
Helipark Limited	Operating under interim permit	DOC-5557955	74132-WARS	21/08/2018	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
McNicholas Aviation Limited	Operating under interim permit	DOC-5554466	74160-WARS	15/08/2018	As offered	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.
Sec 9(2)(a)	Operating under interim permit	DOC-5563395	74161-WARS	28/08/2018	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Wairarapa Helicopters Limited	Operating under interim permit	DOC-5564308	74162-WARS	29/08/2018	10 yrs	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.
Central Helicopters Limited	Operating under interim permit	DOC-5633599	74163-WARS	26/11/2018	3 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Amalgamated Helicopters NZ Limited	Operating under interim permit	DOC-5559097	74164-WARS	22/08/2018	5 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.

Applicant	Existing Status	Long term application DOC ref.	Long term application WARS ref.	Application Received	Term Sought (yrs)	Other Comments
Alpha Helicopters Limited	Operating under interim permit	DOC-5576035	74165-WARS	11/09/2018	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Fiordland Enterprises Limited	Operating under interim permit	DOC-5557956	74127-WARS	21/08/2018	10 yrs	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.
Hawkeye Helicopters Limited	Operating under interim permit	DOC-5540951	74131-WARS	30/07/2018	10 yrs	2019 record of helicopter accident in PD. On condition of updated MPI approvals/supply contracts evidence.
Huntsman Limited	Operating under interim permit	DOC-5602312	74134-WARS	17/10/2018	Max allowed	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Sec 9(2)(a)	Operating under interim permit	DOC-5538365 & 5508774	74142-WARS	26/07/2018	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Te Anau Helicopter Services Limited	Operating under interim permit	DOC-5563017	74147-WARS	28/08/2018	10 yrs	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.
Hokitika Helicopter Services Limited	Waiting applicant	DOC-6596782	93148-WARS	03/03/2021	10 yrs	No record of breaches in PD. Updated supply contract evidence provided. Awaiting MPI certification.



Applicant	Existing Status	Long term application DOC ref.	Long term application WARS ref.	Application Received	Term Sought (yrs)	Other Comments
Silver Fern Petfoods Limited	Active	DOC-6758082	96086-WARS	11/08/2021	5 yrs	This applicant applied for a long term, national concession but needed an urgent 'interim' permit so accepted a more limited area concession under the 2015 Schedule. It is now proposed to offer a variation to that concession to enable use of the 2023 land schedule and align the term. No record of breaches in PD.

### South Island Land Schedule Concession Applications

Applicant	Existing Status	Long-term application DOC ref.	Long-term application WARS ref.	Application Received	Term sought (yrs)	Other Comments
Action Helicopters Limited	Operating under interim permit	DOC-5615190	74061-WARS	06/11/2018	As offered	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.
Ahaura Helicopters	Operating under interim permit	DOC-5540964	74123-WARS	30/07/2018	10 yrs	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.
The Alpine Group Limited (Alpine Helicopters)	Operating under interim permit	DOC-5539132	74124-WARS	27/07/2018	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.

Applicant	Existing Status	Long-term application DOC ref.	Long-term application WARS ref.	Application Received	Term sought (yrs)	Other Comments
Amalgamated Helicopters NZ Limited	Operating under interim permit	DOC-5559097	74164-WARS	22/08/2018	5 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Back Country Helicopters (2022) Limited	Operating under interim permit	DOC-5543206	74125-WARS	01/08/2018	10 yrs	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.
Barn Bay Fishing Co Limited	Operating under interim permit	DOC-5614154	74126-WARS	05/11/2018	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Fiordland Enterprises Limited	Operating under interim permit	DOC-5557956	74127-WARS	21/08/2018	10 yrs	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.
Fiordland Helicopters Limited	Operating under interim permit	DOC-5535967	74128-WARS	23/07/2018	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Glacier Country Helicopters Limited	Operating under interim permit	DOC-5630423	74129-WARS	21/11/2018	10 yrs	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.
Alpine Springs Helicopters (WR & GF Hales)	Operating under interim permit	DOC-5538378	74130-WARS	26/07/2018	10 yrs	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.

Applicant	Existing Status	Long-term application DOC ref.	Long-term application WARS ref.	Application Received	Term sought (yrs)	Other Comments
Hawkeye Helicopters Limited	Operating under interim permit	DOC-5540951	74131-WARS	30/07/2018	10 yrs	2019 record of helicopter accident in PD. On condition of updated MPI approvals/supply contracts evidence.
Helipark Limited	Operating under interim permit	DOC-5557955	74132-WARS	21/08/2018	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Heliventures NZ Limited	Operating under interim permit	DOC-5630451	74133-WARS	21/11/2018	10 yrs	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.
Huntsman Ltd	Operating under interim permit	DOC-5602312	74134-WARS	17/10/2018	Max allowed	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Sec 9(2)(a)	Operating under interim permit	DOC-5630467	74135-WARS	21/11/2018	10 or 5+5 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
D J & N A Shanks Limited	Operating under interim permit	DOC-5614394	74136-WARS	05/11/2018	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Minaret Station Limited	Operating under interim permit	DOC-5539876	74138-WARS	27/07/2018	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.

Applicant	Existing Status	Long-term application DOC ref.	Long-term application WARS ref.	Application Received	Term sought (yrs)	Other Comments
Mountain Helicopters Fox Glacier Limited	Operating under interim permit	DOC-5614170	74139-WARS	05/11/2018	As offered	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Nokomai Helicopters Limited	Operating under interim permit	DOC-5567706	74140-WARS	03/09/2018	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
North West Livestock Ltd	Operating under interim permit	DOC-5563224	74141-WARS	28/08/2018	10 yrs	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.
Sec 9(2)(a)	Operating under interim permit	DOC-5538365 & 5508774	74142-WARS	26/07/2018	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Ranger Helicopters Limited	Operating under interim permit	DOC-5535960	74143-WARS	18/03/18	As offered	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Snowline Safaris Limited	Operating under interim permit	DOC-5535226	74144-WARS	23/07/2018	Long term	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Southern Lakes Helicopters Ltd	Operating under interim permit	DOC-5535228	74145-WARS	23/07/2018	5 + 5 yrs	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.

Applicant	Existing Status	Long-term application DOC ref.	Long-term application WARS ref.	Application Received	Term sought (yrs)	Other Comments
Te Anau Deer Ltd	Operating under interim permit	DOC-5535234	74146-WARS	23/07/2018	5 + 5 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Te Anau Helicopter Services Limited	Operating under interim permit	DOC-5563017	74147-WARS	28/08/2018	10 yrs	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.
Wild Animal Management Ltd	Operating under interim permit	DOC-5563714	74148-WARS	29/08/2018	10 yrs	2019 record of inappropriate gut bag and fuel container dumping breaches in PD which were accepted as an error and no further action taken. Updated MPI approvals/supply contract evidence provided.
Sec 9(2)(a)	Operating under interim permit	DOC-5592209	74150-WARS	02/10/2018	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Sec 9(2)(a)	Waiting applicant	DOC-7116863	101776-WARS	01/08/2022	10 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Alpine Springs Helicopters Agricultural Limited	Waiting applicant	DOC-6713275	94858-WARS	07/07/2021	5 yrs	No record of breaches in PD. Updated MPI approvals/supply contract evidence provided.

Applicant	Existing Status	Long-term application DOC ref.	Long-term application WARS ref.	Application Received	Term sought (yrs)	Other Comments
P F Sugrue Limited	Waiting applicant	DOC-6523577	91748-WARS	14/12/2020	5 yrs	No record of breaches in PD. On condition of updated MPI approvals/supply contracts evidence.
Hokitika Helicopter Services Limited	Waiting applicant	DOC-6596782	93148-WARS	08/03/21	10 yrs	No record of breaches in PD. Updated supply contract evidence provided. Awaiting MPI certification.
Silver Fern Petfoods Limited	Active	(Term 5 yrs)	94679-WARS	03/06/2021	5 yrs	This applicant applied for a long term, national concession but needed an urgent 'interim' permit so accepted a more limited area concession under the 2015 Schedule. It is now proposed to offer a variation to that concession to enable use of the 2023 land schedule and align the term. No record of breaches in PD.