

Hon Todd McClay

Minister of Agriculture
Minister of Forestry
Minister for Hunting and Fishing
Minister for Trade
Associate Minister of Foreign Affairs



20 DEC 2024

Te Rūnanga o Ngā Wairiki Ngāti Apa
info@ngawairikingatiapa.iwi.nz

9(2)(a)

9(2)(a)

TM02786 / 24-B-0567

Tēnā koutou ngā taratī o Te Rūnanga o Ngā Wairiki Ngāti Apa

I am writing to you as the Minister for Hunting and Fishing. As you may already be aware, the Hunting and Fishing portfolio is new and one that I have a strong passion for and interest in.

As Minister for Hunting and Fishing, I have four key priorities:

- Managing game animals as valued introduced species to ensure numbers are best managed for each region's individual interests
- Supporting Fish and Game and the Game Animal Council
- Introducing Herds of Special Interest (HOSI) to balance hunting and conservation objectives
- Increasing hunting access to Public Conservation Land.

I am writing to you now in the context of my priority to support Fish and Game New Zealand (Fish and Game). I understand that you have a particular relationship with the Wellington Fish and Game Council through the Ngāti Apa (North Island) Claims Settlement Act 2010.

I believe there are improvements that could be made to help Fish and Game address some long-standing challenges. Fish and Game could be modernised and made more effective to help it focus on its primary responsibilities and prepare for future challenges.

You may be aware that a review of Fish and Game was carried out in 2021, to consider how it could improve. While the review was useful, it also had limitations, and time has passed since its recommendations were made.

I am interested in your views on the governance and operation of the Wellington Fish and Game Council and Fish and Game more generally. I am particularly interested in any views you might have that would make the Council more effective and efficient, and support them to improve their relationships with others, including iwi.

I have also written directly to all Fish and Game Councils to seek their input, asking them to reflect the views of interested parties within the region.

You are welcome to provide your views in writing to me by the end of February 2025 via Todd.McClay@parliament.govt.nz, or if you have a relationship with the Department of Conservation (DOC) please use this channel, or your local DOC office, if you would prefer to discuss your views in person.

Nāku noa nā

A handwritten signature in blue ink, appearing to read 'Todd McClay', with a stylized flourish at the end.

Hon Todd McClay
Minister for Hunting and Fishing

Miranda Grimmer

From: 9(2)(a)
Sent: Monday, 17 March 2025 5:00 pm
To: Frances Walsh
Subject: Re: Follow up re: phonecall

Kei te tika,

The only thing I wanted to feedback is that we are owners in Santoft forest as we have received a number of blocks back from Ernslaw and we have planted and are managing ourselves. We need to be included as landowners in the Fish & Game booklet for Santoft, our blocks are from Raumai Range north.

The hunting kaupapa raises its head from time to time as we have people contact us directly to hunt in Santoft. We haven't got a designated response person for hunting at the Rūnanga but it is important for Fish & Game to be aware of changes in land ownership at Santoft and to keep comms open. We had to close access to Santoft due to the fire risk at present so that would impact on people using the area and being aware of additional risks.

Ngā mihi,

9(2)(a)

Get [Outlook for Android](#)

From: Frances Walsh <fwalsh@doc.govt.nz>
Sent: Friday, March 14, 2025 1:54:38 PM
To: 9(2)(a)
Subject: RE: Follow up re: phonecall

Kei te pai e hoa – your brain is full of so much other stuff!

I think it was regarding the F&G review – responding to the Minister's letter asking if you had any suggestions for how to improve their operations 😊

Frances Walsh
Ngāti Porou

Ranger Community | Kaitiaki Ao Hāpori
Palmerston North | Te Papaioea
Mobile: 9(2)(a)

www.doc.govt.nz

From: 9(2)(a)
Sent: Friday, 14 March 2025 1:38 pm
To: Frances Walsh <fwalsh@doc.govt.nz>
Subject: Follow up re: phonecall

Kia ora Frances,

Aroha mai - I've been wracking my brains trying to remember the specific kaupapa we spoke about on the phone the other day regarding permissions and I can't remember which one we were referring to but I did say I wanted to follow up with Chris as I thought we should put in a comment.

Can you remind me please? Lol

Ngā mihi,

9(2)(a)

Get [Outlook for Android](#)

Caution - This message and accompanying data may contain information that is confidential or subject to legal privilege. If you are not the intended recipient you are notified that any use, dissemination, distribution or copying of this message or data is prohibited. If you received this email in error, please notify us immediately and erase all copies of the message and attachments. We apologise for the inconvenience. Thank you.

OIAD-5325 Item 3 - Substantive information captured within internal correspondence between Department of Conservation staff

In relation to item 3, DOC staff exchanged substantive contextual information that had been shared verbally in hui between DOC staff and Te Rūnanga o Ngā Wairiki Ngāti Apa. Please find a summary of this information below, Ngā Wairiki Ngāti Apa:

- considered there to be synergies in the taiao space with Fish and Game New Zealand (Fish and Game) and considered they would work more closely together, although they currently do not.
- shared that they consider statutory relationships to be important, noting that relationships can be difficult to manage when they are not formalised.
- noted that Fish and Game have a responsibility to manage fisher/hunter access to some areas and in order for them to do that well they should understand and keep updated with who the land managers are.
- raised concern about the Fish and Game process for their hunting permit booklet. Ngā Wairiki Ngāti Apa considered they were not given enough time to review, adequately consult iwi, and make comment on the booklet this year (they were given one week). This meant that this seasons booklet regarding the Santoft Forest will not include Ngā Wairiki Ngāti Apa's perspective or requirements.

Miranda Grimmer

From: Courtney Kete
Sent: Friday, 24 January 2025 4:44 pm
To: taiao@rangitane.iwi.nz; 9(2)(a) taiao@rangitane.co.nz
Cc: Ariana Hawira; Miranda Grimmer
Subject: Fish and Game - Minister of Hunting and Fishing seeking advice

Tēnā koutou e te whānau,

- The Minister for Hunting and Fishing is exploring potential ways to enhance the effectiveness and efficiency of Fish and Game.
- This is in response to the Government's commitment to support and strengthen Fish and Game, and in response to long-standing challenges that have been evidenced, for example, in the [2021 Review of the governance of Fish and Game New Zealand and the regional Fish and Game councils](#).
- The Minister is interested in any views you might have that would make the Fish and Game council/s you work with more effective and efficient and support them to improve their relationships with iwi and others.
- This is an information gathering phase. The intention is that the new Minister for Hunting and Fishing, Hon James Meager, will use feedback from this phase to inform his next steps.
- The former Minister, Hon Todd McClay, wrote letters to Fish and Game New Zealand and 20 Post-Settlement Governance Entities who have a statutory relationship or arrangement with Fish and Game in their settlement or deed for their views on how Fish and Game could be more effective and efficient.
- With Rangitāne interest in Wairarapa Moana, Ōnoke and the Ruamāhanga awa and all the tributaries and the Manawatū awa and all its tributaries you should be looped into this kaupapa too as your kōrero is valuable.
- We welcome your views in writing (or in person if preferred) to DOC by the end of February 2025 you can connect directly with Miranda Grimmer, DOC senior Policy Advisor, who is leading this mahi mgrimmer@doc.govt.nz and she can answer any queries you may have.

Key messages:

What do Fish and Game do?

- Fish and Game New Zealand (Fish and Game), through the Conservation Act 1987, are mandated to manage, enhance, and maintain sports fish and game birds; and represent the interests of anglers and hunters.
- The Minister for Hunting and Fishing (the Minister) works with Fish and Game on a regular basis to approve the licence fee and conditions for fishing and hunting sports fish and game birds, for example.
- The Minister was previously the Hon Todd McClay but is now Hon James Meager.

Why is the Minister considering changes to Fish and Game?

- The Minister is exploring potential ways to enhance the effectiveness and efficiency of Fish and Game.

- This is in response to the Government’s commitment to support and strengthen Fish and Game, and in response to long-standing challenges that have been evidenced, for example, in the [2021 Review of the governance of Fish and Game New Zealand and the regional Fish and Game councils](#).

Who has the Minister sent letters to?

- The former Minister sent letters to all Fish and Game councils and 20 Post-Settlement Governance Entities (PSGEs) who have a statutory relationship and/or arrangement with Fish and Game through their settlement or deed. The letter asks questions about what improvements could be made to the operation and governance of Fish and Game.
- The former Minister also asked DOC, via their existing relationship channels, to ask similar questions of iwi and hapū who are yet to settle or who do not have a relationship and/or arrangement with Fish and Game in their settlement or deed.
- Fish and Game councils were asked to provide their responses by 16 December 2024, with PSGEs having until end of February.

What is the Minister seeking through the letter?

- The former Minister intended the letters to support an information gathering phase.
- The intention is that the new Minister will use feedback from the letters to inform his next steps over the coming term.

Now that there is a change of Minister, who should PSGEs send their letter to?

- PSGEs should send their response to James.MeagerMP@parliament.govt.nz

Information for iwi and hapū without a statutory link to Fish and Game

- For iwi and hapū who have been contacted by DOC, rather than by letter from the former Minister, we recommend providing their views in writing (or verbally if preferred) to DOC by the end of February 2025.

If asked, further information on scope for PSGEs, iwi and hapū

- This work does not impact existing Treaty settlements.
- The scope of this work is focused on opportunities to improve Fish and Game’s operation and governance. Iwi and hapū perspectives on this scope are sought.

What does this mean for the Minister’s visits to regional Fish and Game councils?

- DOC will be supporting the new Minister as he takes responsibility for the Hunting and Fishing Portfolio. Over the next few weeks, we will provide the new Minister with information and key decisions he needs to make.
- At this stage, Minister visits to the regional Fish and Game councils are pending decisions from the new Minister.

Nāku iti noa, nā

Courtney Kete

Ngāti Kahungunu, Rangitāne, Ngāti Maniapoto, Whakatōhea, Ngāti Toa Rangatira

Ranger, Community – *Tiaki Taiao, Ao Hāpori*

Department of Conservation—*Te Papa Atawhai*

M: 9(2)(a)



AOP: Authorising Environment Committee

Minutes

Opening

- Meeting was opened with karakia.
- Committee decided to leave administrative matters to the end, should there be time.

Out of Scope

[illegible]

Out of Scope

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[illegible][illegible]

[REDACTED]

[REDACTED]

████████████████████

Out of Scope

[illegible]

Out of Scope

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

- Key messages regarding changes to Fish and Game:
 - Catriona explained the memo. Feedback on changes closing at end of February. Noting there is a new Minister responsible for Hunting and Fishing – Hon James Meager.
 - Kirsti and Tāmati indicated desire to meet with the Minister on this and matters relating to his other portfolios. Lena to pass that onto his Office (recorded as new action under AOP2425-27 in Actions Register).
 - Out of Scope [Redacted]
[Redacted]
- Kirsti to check wording of draft minutes for November AOP Committee hui (recorded as new action under AOP2425-27 in Actions Register).

Close

- Meeting was closed with karakia.

MEMO

DATE: 21/02/2025

TO: AOP: Authorising Environment Committee

CC:

FROM: Catriona Britton – Relationship Manager, Iwi Strategy

SUBJECT: Generic key messages regarding changes to Fish and Game New Zealand

Generic key messages

Hon Todd McClay, then Minister for Hunting and Fishing, sent a letter to Te Uru Taumatua on 20 December 2024 (**Appendix One**) seeking views on changes to the governance and operation of the Eastern Fish and Game Council and Fish and Game more generally.

Due to Hon James Meager taking up the Ministerial portfolio for Hunting and Fishing, and the deadline for feedback approaching at the end of February, we considered it timely to reiterate generic key messages regarding these proposed changes in case TUT wished to submit feedback.

What do Fish and Game do?

- Fish and Game New Zealand (**Fish and Game**), through the Conservation Act 1987, are mandated to manage, enhance, and maintain sports fish and game birds; and represent the interests of anglers and hunters.
- The Minister for Hunting and Fishing (**the Minister**) works with Fish and Game on a regular basis to approve the licence fee and conditions for fishing and hunting sports fish and game birds, for example.
- The Minister was previously the Hon Todd McClay but is now Hon James Meager.

Why is the Minister considering changes to Fish and Game?

- The Minister has been exploring potential ways to enhance the effectiveness and efficiency of Fish and Game.
- This is in response to the Government's commitment to support and strengthen Fish and Game, and in response to long-standing challenges that have been evidenced, for example, in the [2021 Review of the governance of Fish and Game New Zealand and the regional Fish and Game councils](#).

Who has the Minister sent letters to?

- The former Minister sent letters to all Fish and Game councils and 20 post-settlement government entities (**PSGEs**) who have a statutory relationship and/or arrangement with Fish and Game through their settlement or deed. The letter asks questions about what improvements could be made to the operation and governance of Fish and Game.
- The former Minister also asked DOC, via their existing relationship channels, to ask similar questions of iwi and hapū who are yet to settle or who do not have a relationship and/or arrangement with Fish and Game in their settlement or deed.

- Fish and Game councils were asked to provide their responses by 16 December 2024, with PSGEs having until the end of February 2025.

What is the Minister seeking through the letter?

- The former Minister intended the letters to support an information gathering phase.
- The intention is that the new Minister will use feedback from the letters to inform his next steps over the coming term.

Now that there is a change of Minister, who should PSGEs send their letter to?

- PSGEs should send their response to James.MeagerMP@parliament.govt.nz

Further information on scope for PSGEs, iwi and hapū

- This work does not impact existing Treaty settlements.
- The scope of this work is focused on opportunities to improve Fish and Game's operation and governance. Iwi and hapū perspective on this scope are sought.

What does this mean for the Minister's visits to regional Fish and Game councils?

- DOC will be supporting the new Minister as he takes responsibility for the Hunting and Fishing portfolio. Over the next few weeks, we will provide the new Minister with information and key decisions he needs to make.
- At this stage, Minister visits to the regional Fish and Game councils are pending decisions from the new Minister.

Miranda Grimmer

From: Miranda Grimmer
Sent: Wednesday, 30 April 2025 2:59 pm
To: Laura West
Cc: Dolon Sarkar; Mary Craythorne; Nicola Molloy (Policy Manager); Patrick West-Oram
Subject: RE: For response by 29 April: Draft Cabinet paper Fish and Game

Kia ora Laura,

Thanks very much for your feedback and apologies for not responding sooner!

You've made some good suggestions below which we consider will likely be addressed during implementation (for example, further clarifying performance measures). We also considered how to pull in your suggestion on the Biosecurity Act, which we acknowledge is an important interaction, although with the page limit we had to make the call to cut that from the paper.

Hope you have a good rest of your week and happy to keep you in the loop as work progresses

Ngā mihi,
Miranda

From: Laura West <Laura.West@mpi.govt.nz>
Sent: Tuesday, 29 April 2025 2:51 pm
To: Miranda Grimmer <mgrimmer@doc.govt.nz>
Cc: Dolon Sarkar <Dolon.Sarkar@mpi.govt.nz>; Mary Craythorne <Mary.Craythorne@mpi.govt.nz>
Subject: RE: For response by 29 April: Draft Cabinet paper Fish and Game

Kia ora Miranda,

Thank you for the opportunity to provide comment on the attached draft Cabinet paper for the Fish and Game Governance and Organisational Improvements Amendment Bill and supporting RIS. We have consulted internally with our operational colleagues and our feedback is provided below:

- Given the scope of the policy analysis and parameters in place, the package of proposals seems to be logical. However, we feel that the result still feels like a 'top heavy' governance model. This may be a direct result of the limited scope. The solution to reduce the councillor numbers and provide clarity around the option to merge regions should allow for the number of governors to reduce somewhat further as required.
- Where noted that there are some Fish and Game Councils that will not agree with the proposals entirely, we do not anticipate any relationship risk in this for Biosecurity New Zealand.
- We support the intention to improve decision making by including requirements to consider 'other interests'. We also agree with the proposal to include this specifically in Fish and Game Council 'function' and as part of the development of Sports Fish Game Management Plans (refer to Cab paper - Appendix One, (51-53). We agree that Treaty, Conservation, and impacts on other natural resources should be prioritised.
- It may be useful to see additional clarity on how performance will be measured and to be clearer on the Bill's interface with existing legislation such as the Biosecurity Act.

- It could also be beneficial to have a clearer statement that NZC policy on managing impacts to other values are binding on the regional Fish and Game Council. It seems to be but isn't covered in section 6 of the table in Appendix One.

Please feel free to get in contact, if need be, and all the best with progressing this amendment Bill and supporting RIS.

Ngā mihi

Laura West (She/Her) | Policy Analyst, Biosecurity System Policy
Regulatory Systems Policy | Policy & Trade
Ministry for Primary Industries
Charles Fergusson Building, 34-38 Bowen Street, PO Box 2526, Wellington 6011 New Zealand
Web: www.mpi.govt.nz |

Ministry for Primary Industries
Manatū Ahu Matua



[seemail]

From: Miranda Grimmer <mgrimmer@doc.govt.nz>
Sent: Thursday, 17 April 2025 3:53 PM
To: Papers2review@tearawhiti.govt.nz; Caleb.Hewson@treasury.govt.nz; TPKinfo@tpk.govt.nz; Lisa.daniell@dpmc.govt.nz; Michael.Cameron@mfe.govt.nz; Pierre.Tellier@mfe.govt.nz; Helen.Sharpe@mfe.govt.nz; Jo.Burton@mfe.govt.nz; Bronte.Creighton-Shaw@treasury.govt.nz; Ashleigh.Moss-Brown@treasury.govt.nz; Saskia.Vervoorn@mbie.govt.nz; Mary.Craythorne@mpi.govt.nz; Gina.Chamberlain@mpi.govt.nz; Amy.Orr@pco.govt.nz; Saskia.Vitasovich@justice.govt.nz; enquiries@mfat.govt.nz; steven.riley@publicservice.govt.nz; Mat.Powell@publicservice.govt.nz; nick.law@dia.govt.nz; Keith.Miller@dia.govt.nz; Andrew.Marshall@mfe.govt.nz; Carla.Gomez@mfe.govt.nz
Cc: Nicola Molloy (Policy Manager) <nimolloy@doc.govt.nz>; Patrick West-Oram <pwestoram@doc.govt.nz>; Paul Sorensen <psorensen@doc.govt.nz>; Manon Roehrig <mroehrig@doc.govt.nz>
Subject: For response by 29 April: Draft Cabinet paper Fish and Game

Some people who received this message don't often get email from mgrimmer@doc.govt.nz. [Learn why this is important](#)

Kia ora koutou,

Following on from our email earlier in the week, please find attached the draft Cabinet paper "Fish and Game Governance and Organisational Improvements Amendment Bill" and supporting RIS for your feedback. These papers are also now circulating for Ministerial consultation.

It would be great to receive your feedback by COB Tuesday 29 April. We anticipate lodging the Cabinet paper on 1 May.

Please note Paul Sorensen and Manon Roehrig will be your main contacts over 22-24 April

Hope everyone has a good easter break!

Ngā mihi,
Miranda

Miranda Grimmer

Senior Policy Advisor | Hunting, Fishing, and Economic Development | Policy and Regulatory Services

Department of Conservation | Te Papa Atawhai

Please note that my usual working hours are Tuesday/Wednesday 9am – 5pm, Friday 7:30am – 3:30pm, and every second Monday 9am – 5pm.

www.doc.govt.nz



Caution - This message and accompanying data may contain information that is confidential or subject to legal privilege. If you are not the intended recipient you are notified that any use, dissemination, distribution or copying of this message or data is prohibited. If you received this email in error, please notify us immediately and erase all copies of the message and attachments. We apologise for the inconvenience. Thank you.

Miranda Grimmer

From: Miranda Grimmer
Sent: Wednesday, 30 April 2025 3:30 pm
To: Sanders, David
Cc: Papers2review@tearawhiti.govt.nz; Patrick West-Oram; Nicola Molloy (Policy Manager)
Subject: RE: For response by 29 April: Draft Cabinet paper Fish and Game

Kia ora David,

Thanks very much for your response

I note the change in name, and I have amended to 'Office of Treaty Settlements and Takutai Moana - Te Tari Whakatau'

I also note your point on iwi and hapū interests relating to Marine and Coastal Area (Takutai Moana) Act 2011, we will keep this in mind during the implementation phase as we see this interaction occurring in Fish and Game decision-making (for example the preparation of sports fish and game management plans).

Hope you have a good rest of your week

Ngā mihi,
Miranda

From: Sanders, David <David.Sanders@tearawhiti.govt.nz>
Sent: Wednesday, 30 April 2025 1:12 pm
To: Miranda Grimmer <mgrimmer@doc.govt.nz>
Cc: Papers2review@tearawhiti.govt.nz
Subject: FW: For response by 29 April: Draft Cabinet paper Fish and Game

Kia ora Miranda,

Thank you for the opportunity to comment on the draft Cabinet paper for the Fish and Game New Zealand Governance and Organisational Improvements Amendment Bill.

Te Tari Whakatau has no general comment on the purpose of the proposed legislative changes to the Conservation Act to modernise and increase the operational effectiveness of the regional Fish & Game Councils, or their national coordinating body, the New Zealand Fish & Game Council.

We note that there is no intention to change the purpose and functions of the New Zealand Fish & Game Council as are currently defined in the Conservation Act.

We note (para 55) that 20 post-settlement governance entities have a statutory relationship or arrangement with Fish and Game specifies in their settlement act or deed but that the proposals do not intend to impact these relationships or arrangements. For example, Ngāi Tahu's role as a statutory advisor to all South Island regional Fish and Game councils on matters relating to native game birds.

TTW support the proposal to “strengthen the requirement for Fish and Game to have regard to non-hunting interests will better manage the impact on other resources and users of the habitat. For example, farming, aviation, conservation, and iwi and hapū interests will require more active consideration in Fish and Game decision-making.” (para 56). In respect of iwi and hapū interests, you may wish to footnote that this would include obligations under the Marine and Coastal Area (Takutai Moana) Act 2011 (such as wahi tapu provisions, and any kaitiakitanga management plans rights holders may have in place).

Note re consultation (para 60) Te Arawhiti corporate name has changed to Te Tari Whakatau.

Ngā mihi

David



David Sanders (he/him)

SENIOR ANALYST

CEL: b2(a) DDI:

WEB: <https://whakatau.govt.nz>

**The Office of Treaty Settlements and Takutai Moana:
Te Tari Whakatau**

Level 3, Justice Centre, 19 Aitken Street, SX10111, Wellington 6011

From: Miranda Grimmer <mgrimmer@doc.govt.nz>

Sent: Thursday, April 17, 2025 3:53 PM

To: Papers2review@tearawhiti.govt.nz; Caleb.Hewson@treasury.govt.nz; TPKinfo@tpk.govt.nz; Lisa.daniell@dpmc.govt.nz; Michael.Cameron@mfe.govt.nz; Pierre Tellier <pierre.tellier@mfe.govt.nz>; Helen Sharpe <Helen.Sharpe@mfe.govt.nz>; Jo Burton <Jo.Burton@mfe.govt.nz>; Bronte.Creighton-Shaw@treasury.govt.nz; Ashleigh.Moss-Brown@treasury.govt.nz; Saskia.Vervoorn@mbie.govt.nz; Mary.Craythorne@mpi.govt.nz; Gina.Chamberlain@mpi.govt.nz; Amy Orr <Amy.Orr@pco.govt.nz>; Vitasovich, Saskia <saskia.vitasovich@justice.govt.nz>; enquiries@mfat.govt.nz; steven.riley@publicservice.govt.nz; Mat Powell <Mathew.Powell@publicservice.govt.nz>; nick.law@dia.govt.nz; Keith.Miller@dia.govt.nz; Andrew.Marshall@mfe.govt.nz; Carla.Gomez@mfe.govt.nz

Cc: Nicola Molloy (Policy Manager) <nimolloy@doc.govt.nz>; Patrick West-Oram <pwestoram@doc.govt.nz>; Paul Sorensen <psorensen@doc.govt.nz>; Manon Roehrig <mroehrig@doc.govt.nz>

Subject: For response by 29 April: Draft Cabinet paper Fish and Game

Kia ora koutou,

Following on from our email earlier in the week, please find attached the draft Cabinet paper “Fish and Game Governance and Organisational Improvements Amendment Bill” and supporting RIS for your feedback. These papers are also now circulating for Ministerial consultation.

It would be great to receive your feedback by COB Tuesday 29 April. We anticipate lodging the Cabinet paper on 1 May.

Please note Paul Sorensen and Manon Roehrig will be your main contacts over 22-24 April

Hope everyone has a good easter break!

Ngā mihi,
Miranda

Miranda Grimmer

Senior Policy Advisor | Hunting, Fishing, and Economic Development | Policy and Regulatory Services
Department of Conservation | Te Papa Atawhai

Please note that my usual working hours are Tuesday/Wednesday 9am – 5pm, Friday 7:30am – 3:30pm, and every second Monday 9am – 5pm.

www.doc.govt.nz



Caution - This message and accompanying data may contain information that is confidential or subject to legal privilege. If you are not the intended recipient you are notified that any use, dissemination, distribution or copying of this message or data is prohibited. If you received this email in error, please notify us immediately and erase all copies of the message and attachments. We apologise for the inconvenience. Thank you.

In Confidence

Office of the Minister for Hunting and Fishing

Cabinet Economic Policy Committee

Fish and Game New Zealand Governance and Organisational Improvements Amendment Bill

Proposal

- 1 I seek Cabinet approval to provide drafting instructions to the Parliamentary Counsel Office (PCO) for a package of proposals to improve Fish and Game New Zealand's (Fish and Game) governance and organisational practice.

Relation to government priorities

- 2 Supporting Fish and Game is one of the key priorities for the newly established Hunting and Fishing portfolio. My proposals will modernise and improve the effectiveness and efficiency of Fish and Game and provide better experiences and value-for-money for licence holders. This will contribute to tackling the current cost of living challenge; supporting tourism and economic activity in our regions; and better enabling hunting and fishing, a significant recreational activity in our country.

Executive Summary

- 3 I want to make it easier for New Zealanders to hunt and fish. This recreational activity is important to our country and supports tourism and economic activity in the regions.
- 4 Fish and Game manage New Zealand's sports fish and game bird resource. This arms-length organisation is formed of 12 separate regional councils and one National Council. It is funded by licence payers in a 'user pays, user says' system, with revenue of about \$13 million annually.
- 5 While Fish and Game does important work for tourism, regional economies, our environment and wellbeing, they are not operating or governing the resource and revenue as well as they could be. Several reports and audits over the years, as well as ongoing complaints to Ministers and media attention, clearly bring this to light. This erodes trust in the organisation, means hunting and fishing resources are not being managed as effectively as they should be, and results in poor value for licence holders.
- 6 I intend to modernise and improve Fish and Game to be a more trusted, accountable, and cohesive organisation that manages resources well and provides strong outcomes and good value-for-money for licence holders. This will ensure future generations can continue to hunt and fish.

Summary of decisions sought

- 7 My broad intent for my proposals is to:
- 7.1 maintain regional decision making over local matters, which is the cornerstone of the organisation, by focusing local knowledge and resource on improving hunting and fishing opportunities for their region
 - 7.2 no longer require individual regional councils to spend time on some administrative activities, where they are more effectively done by the National Council
 - 7.3 strengthen the leadership role of the National Council to set clear, coherent direction, collect the licence fee, and disperse it so it better supports the core functions of the organisation, including getting funds to where they are needed to support angler and hunter activity
 - 7.4 improve the 'user pays, user says' system and how Fish and Game make decisions, including how it considers non-hunting and fishing interests in decision-making
 - 7.5 strengthen checks and balances to improve accountabilities and transparency and provide adequate backstops so that the responsible Minister can intervene as necessary in exceptional circumstances
 - 7.6 more generally modernise the organisation in line with other entities to support further efficiencies and effectiveness.
- 8 I seek agreement to a package of proposals (attached at **Appendix One**) which will support this intent.
- 9 I also intend to create a stand-alone Fish and Game Act, similar to the Game Animal Council Act 2013, to raise the profile of the organisation.

Next steps

- 10 If agreed, I will instruct the Department of Conservation (DOC) to provide drafting instructions to PCO. My intent is to return to Cabinet seeking approval to introduce a Bill to the House later this year.

Background: Making it easy to hunt and fish and opportunity for growth

- 11 Fish and Game was formed in early 1990, shifting from the 24 acclimatisation societies of the 1880's. Fish and Game is independent, with most of their \$13 million annual revenue coming from licence fee sales. Direction of the organisation is set by licence holders who are publicly elected to each of the 12 regional councils. Regional councils manage the sports fish and game resource (e.g. trout, salmon, and mallard ducks) locally. The National Council is formed of one nominated councillor from each region. It co-ordinates activity and provides statutory advice to the Minister.
- 12 Fish and Game supports an associated spend of between \$113 million - \$138.6 million per annum from hunter and angler activity. This contributes an estimated \$66.2 million–\$81.2 million in total value added (Gross Domestic

Product), as well as supporting wellbeing and tourism, and enhancing our environment by ensuring adequate habitat for sports fish and game birds.

There is a clear need to improve Fish and Game's efficiency and effectiveness

- 13 Fish and Game are not operating or governing the fish and game resource as well as they could be, resulting in sub-optimal outcomes for licence holders. Several independent reviews and audits have found that the organisation is dysfunctional and that the legislative settings are no longer fit for purpose.
- 14 There are examples of good practice and well-functioning councils. However, reviews generally conclude that Fish and Game councils have poor decision-making, governance and accountability practices (including behaviours), leading to unnecessary discord with other resource users (such as farmers).
- 15 There are more Fish and Game councillors than there are members of Parliament, often lacking governance expertise. Many licence holders are disengaged or completely excluded from what should be a 'user pays, user says' system (only four percent of eligible licence holders voted in the last election). Few, therefore, hold Fish and Game to account for their decision-making, performance and professionalism.
- 16 Licence holders and others perceive a single entity, but the legislation provides for an autonomous and federated structure. The National Council has a co-ordinating role but no teeth to fully enable this. Councils can therefore undermine each other and the organisation, while good practice is not always replicated. Revenue is wasted in duplicating common activities and skilled staff, or sits idle in individual council reserves due to perverse incentives created by current the revenue collection and allocation method.
- 17 Although Fish and Game has statutory responsibility, a clear picture of the state of the resources they manage is not easy to see. Legislative settings mean that there is no common approach to monitoring or compliance, making it difficult to build a comparable and credible national picture of the hunting and fishing resource. This further undermines ability to assess if revenue is going where it is needed to support higher need or activity levels.
- 18 This undermines confidence in Fish and Game's ability to deliver on its regulatory role and puts the future of the organisation in question.

Proposals to streamline operations

- 19 Fish and Game are making some positive changes in response to the 2021 governance review.¹ However, as the review acknowledged, tackling the problems effectively requires legislative change.

¹ Clark, B. and Mills, J. 2021. Review of the governance of Fish and Game New Zealand and the regional Fish and Game councils. https://www.beehive.govt.nz/sites/default/files/2021-04/FINAL%20Report%20-%20Review%20of%20Fish%20and%20Game%20New%20Zealand%202020_0.pdf

- 20 I do not intend to change Fish and Game's purpose or mandate, nor force a reduction in the number of Fish and Game regions.²
- 21 My broad intent is to:
- 21.1 maintain regional decision making over local matters, which is the cornerstone of the organisation, by focusing local knowledge and resource on improving hunting and fishing opportunities for their region
 - 21.2 no longer require individual regional councils to spend time on some administrative activities, where they are more effectively done by the National Council
 - 21.3 strengthen the leadership role of the National Council to set clear, coherent direction, collect the licence fee, and disperse it so it better supports the core functions of the organisation, including getting funds to where they are needed to support angler and hunter activity
 - 21.4 improve the 'user pays, user says' system and how Fish and Game make decisions, including how it considers non-hunting and fishing interests in decision-making
 - 21.5 strengthen checks and balances to improve accountabilities and transparency and provide adequate backstops so that the responsible Minister can intervene as necessary in exceptional circumstances
 - 21.6 more generally modernise the organisation in line with other entities to support further efficiencies and effectiveness.
- 22 I seek agreement to a package of proposals (at **Appendix One**) which will support this intent. The key proposals are outlined below.

Creating a stand-alone Fish and Game Act

- 23 I intend to create a stand-alone Fish and Game Act to separate out Fish and Game's functions from where they primarily sit in the Conservation Act.³ This will not change their current functions or responsibilities under the Act. This would be similar to the Game Animal Council Act 2013.
- 24 A stand-alone Act will recognise Fish and Game's role as a key organisation in the hunting and fishing sector, raising its profile. This should in turn support improved practices and professionalism with greater scrutiny that comes from such recognition.
- 25 DOC will work with PCO and the Legislative Design and Advisory Committee (LDAC) on the stand-alone Act and any other matters contained in this paper.

² The 2021 review of Fish and Game governance recommended reducing the Fish and Game regions to six as the main mechanism to improve efficiencies and effectiveness.

³ Other legislation relating to sports fishing and game bird hunting is spread across 15 other pieces of both primary and secondary legislation.

Shifting functions between regional councils and the National Council

- 26 Licence holders perceive a single entity: what one council does can undermine the credibility of the organisation, yet good practice regionally is not always replicated nationally. Fish and Game's federated structure does not support cohesiveness, and regional councils create their own policies which duplicate roles, and salaries. The National Council can only provide a co-ordinating function, but their direction can be rejected by regional councils. This means unnecessary variation across the organisation, and poor use of licence payer revenue.
- 27 Fish and Game's core function is to manage hunting and fishing resources effectively. However, different approaches to monitoring can make it difficult to build a true national picture. Variation in the approach to compliance and enforcement creates confusion for licence holders and opens up legal risks. A single region's decision to pursue a court case can set unhelpful precedents or damage the organisation's reputation as a whole.
- 28 Regional councils need to focus on delivering value at place, and the national Council on unifying the organisation to enable this. I want to ensure local decision making is maintained where appropriate. However, the approach taken across councils needs to be consistent and provide for coherence.
- 29 I propose to enable the National Council to:
- 29.1 set national binding policies, in consultation with regional councils, for specific activities. These binding policies, as appropriate, will either:
 - 29.1.1 provide for regional flexibility by setting minimum activity levels for some activities; and/or
 - 29.1.2 provide parameters, for some activities, for carrying out activities with optionality to adapt to region specific needs, for example for monitoring, compliance and advocacy; or
 - 29.1.3 provide a unified way of doing things, for example health and safety or human resources policies.
- 30 To acknowledge the significance of this shift and to ensure that the national Council makes decisions in the interests of both its regional councils and the organisation, I propose to:
- 30.1 Specify that the National Council is made up of regional council chairs. This will build trust and support a stronger connection between national and regional levels.

Financial Settings

- 31 Although licences are valid nationwide, revenue from licence sales is collected regionally, usually where the purchaser buys their licence. Fish and Game levy a portion of revenue for the National Council's purposes and to reallocate across regions which creates double and triple handling.

- 32 Not only is this inefficient, but revenue does not always follow activity or need. The licence holder may buy their licence in Auckland, but fish in the Ashburton River and hunt in the Waikato. Fish and Game also notes that fishing activity has been trending southward, but revenue is not following.
- 33 The system incentivises under-forecasting of licence sales so regions can hold onto 'their money', an approach which works against the organisation. This has resulted in \$2 million, over 11 years, sitting idle in regional council reserves when it could be used to improve opportunities for licence holders.
- 34 I propose to shift to the National Council the ability to:
- 34.1 collect and issue licences for the organisation and allocate revenue across regional councils and themselves. To guide the use of this revenue I propose to;
 - 34.1.1 make the National Council responsible for developing, in consultation with regional councils, a financial strategy to support funding allocation decisions
 - 34.1.2 develop a funding allocation model that will have flexibility and can be adjusted if needed. The model will set parameters for allocation to:
 - 34.1.2.1 apply to licence fee revenue only
 - 34.1.2.2 provide a method for allocating revenue, in collaboration with Fish and Game, that would balance the needs of the organisation across regional activity levels; key functions (e.g. compliance, monitoring, reporting and planning, and council); and contestable funding.

Improving the 'user pays, user says' system and decision making

- 35 Fish and Game councillors are volunteers, passionate about their sport and good with local knowledge, but there are too many governors to be effective, and they may not have the necessary governance skills or experience for the role. Nor are they representative of the membership. Only 4.2 percent of all licence holders voted in the 2024 elections.
- 36 Fish and Game's mandate to maximise hunting and fishing interests can have negative consequences for non-hunting and fishing interests, including farming, aviation safety and highly threatened native species. This impacts the organisation's reputation with key stakeholders.
- 37 I intend to shore up the democratic 'user-pays, user-says' Fish and Game model, and improve decision making, standards and professionalism by:
- 37.1 reducing the number of councillors in each council to eight; extending the eligibility to both vote and stand for election to all licence holders, and requiring an 'opt-out' electoral roll;

- 37.2 expanding (to all decision making) and strengthening Fish and Game's need to have regard to the interest of non-hunters and anglers.

Increasing transparency and improving checks and balances

- 38 There is currently no easy way to measure Fish and Game's performance or for the responsible Minister to respond to complaints of poor behaviour.
- 39 To improve accountability and ensure the responsible Minister is equipped to step in where Fish and Game is unable to resolve matters internally, I propose measures to:
- 39.1 enable the Minister to appoint up to two councillors to regional councils, with voting rights; and to have an explicit power to review Fish and Game at any time
- 39.2 expand the provision to remove councillors for "just cause"
- 39.3 requiring appropriate fit and proper person test and universally applied codes of conduct
- 39.4 require the National Council to collate all Fish and Game annual reports and include a summary of Fish and Game's overall performance; and
- 39.5 determine that all councils must provide operational work programmes, including proposed outcomes and measurements.

Modernising the system and removing red tape

- 40 I intend to make a number of other smaller changes that would modernise Fish and Game in line with other entities, underpin the 'user pays, user says' system, and provide for further savings and accountabilities. This will improve engagement of and outcomes for licence holders, and cut unnecessary red tape to support economic growth.

Delegating authority to make other minor and technical changes

- 41 The changes I have described above, and others in support of them, are set out more fully at **Appendix One**.
- 42 I also seek agreement for Cabinet to delegate decision-making authority to me to make other minor and technical changes in line with my overall policy intent to support the drafting process.

Implementation

- 43 I propose to provide for a transition period of up to three years from Royal Assent, to allow for a smooth change process. I expect that the incoming Chief Executive of Fish and Game will be instrumental in driving culture change and supporting increased capability to implement my proposals.

- 44 Following this transition period, I expect improvements generated by these proposals will be captured in Fish and Game's compiled annual report.

Cost-of-living Implications

- 45 Improving the efficiency and effectiveness of Fish and Game's governance and operation is likely to result in better value for money for licence holders. This may encourage greater retention of and/or growth in Fish and Game licence holder levels.
- 46 These benefits may flow through to the tourism sector, supporting New Zealand's GDP, job opportunities, and businesses.

Financial Implications

- 47 There are no financial implications for the Crown associated with these proposals.
- 48 The Conservation Act 1987 enables Fish and Game to gather licence fees to manage the sports fish and game bird resource on behalf of the Crown.⁴ Fish and Game may also receive other forms of revenue to manage the resource (e.g. interest, contracts, donations, prosecutions, central and local government funding).
- 49 Any future proposals to remunerate Fish and Game councillors or Ministerial Appointees would be made in accordance with the Cabinet Fees Framework and be funded by Fish and Game's licence fee revenue.

Legislative Implications

- 50 Primary Legislation is required to implement my proposals:

50.1 The Fish and Game Governance and Organisational Improvements Amendment Bill bid has been given a category 5 priority in the 2025 Legislation Programme (referred to select committee in 2025).

50.2 The timeline associated with this Bill is:

Date requested for introduction of the Bill	October 2025
Date of report back from select committee	March 2026
Date of enactment	June 2026
Date of commencement	July 2026

50.3 The Bill will include an enabling provision to allow a funding allocation model to be developed through secondary legislation.

⁴ Section 26Q(1)(d) of the Conservation Act 1987.

51 The proposed Bill will not be binding on the Crown.

Impact Analysis

Regulatory Impact Statement

52 TBC

Climate Implications of Policy Assessment

53 The Climate Implications of Policy Assessment (CIPA) team has been consulted and confirms that the CIPA requirements do not apply to this proposal as the threshold for significance is not met.

Population Implications

54 The policy proposals in this paper are not expected to have significant population impacts. They should be broadly supportive of licence holder interests.

Comment on specific population group implications

55 I understand that 20 post-settlement governance entities have a statutory relationship or arrangement with Fish and Game specifies in their settlement act or deed. My proposals do not intend to impact these relationships or arrangements. For example, Ngāi Tahu's role as a statutory advisor to all South Island regional Fish and Game councils on matters relating to native game birds.

56 My proposal to strengthen the requirement for Fish and Game to have regard to non-hunting interests will better manage the impact on other resources and users of the habitat. For example, farming, aviation, conservation, and iwi and hapū interests will require more active consideration in Fish and Game decision-making.

57 My proposal to expand the eligibility to both vote and stand for election, and the opportunity for Ministerial appointments may support greater participation by a more diverse range of perspectives in Fish and Game governance. For example, women, lower socio-economic groups, and iwi and hapū may benefit from these proposals.

Human Rights

58 The proposals in this paper are consistent with the New Zealand Bill of Rights Act 1990 and the Human Rights Act 1993.

Use of External Resources

59 A policy contractor was engaged to support the development of policy. The contractor was engaged for four months. External resource was required to

temporarily backfill vacancies and provide continuity to meet timeframes. Further external resource is not expected to be required.

Consultation

Agency consultation

- 60 The following Agencies were consulted in the preparation of this Cabinet Paper: *TBC: The Treasury, Ministry of Justice, Ministry of Primary Industries, Ministry of Foreign Affairs and Trade, Public Service Commission, Māori Crown Relations – Te Arawhiti, Ministry of Māori Development – Te Puni Kōkiri, Ministry for the Environment, Department of the Prime Minister and Cabinet, Department of Internal Affairs, and Ministry of Business, Innovation, and Employment.*

Engagement with interest groups outside of central government

- 61 My predecessor, Hon Todd McClay, and I have informally engaged with all 13 Fish and Game councils and specific post-settlement governance entities (PSGEs) to inform next steps. The Department of Conservation supported some further informal engagement with a wider group of iwi and hapū through their existing relationship channels.
- 62 Engagement sought views on how to improve Fish and Game's governance and operations generally rather than on specific policy proposals. Broadly, Fish and Game appear supportive of change to generate efficiencies and effectiveness, but views on how to create this change vary. This more recent engagement built upon the extensive engagement undertaken as part of the Governance Review in 2021.
- 63 Stakeholders and Treaty partners will have an opportunity to provide views on the policies in this paper and contribute during the select committee consideration of the bill.

Communications

- 64 Following Cabinet approval, I intend to make a public announcement and media statement about the policies that will be proposed through the Bill.

Proactive Release

- 65 As soon as practicable after decisions being confirmed by Cabinet and public announcements made, I intend to proactively release this paper, subject to redactions as appropriate under the Official Information Act 1982.

Recommendations

The Minister for Hunting and Fishing recommends that the Committee:

- 1 **Note** that Fish and Game have a statutory role for the management of recreational sports fish and game bird species.

- 2 **Note** I intend to progress legislative change to support Fish and Game to be a more trusted, accountable, and cohesive organisation that provides value for money for its licence holders.
- 3 **Note** that legislative changes will contribute towards tackling the cost-of-living challenges and support tourism and economic activity in our regions.
- 4 **Agree** to create a stand-alone Fish and Game Act, similar to the Game Animal Council Act, to raise the profile of the organisation, noting DOC will work with LDAC on this and any other matter contained in this paper.
- 5 **Agree** to a package of proposals, to be drafted into legislation, that improve Fish and Game's efficiency and effectiveness and value-for-money for licence holders, with the overall intention to:
 - 5.1 maintain regional decision making over local matters, which is the cornerstone of the organisation, by focusing local knowledge and resource on improving hunting and fishing opportunities for their region
 - 5.2 no longer require individual regional councils to spend time on some administrative activities, where they are more effectively done by the National Council
 - 5.3 strengthen the leadership role of the National Council to set clear, coherent direction, collect the licence fee, and disperse it so it better supports the core functions of the organisation, including getting funds to where they are needed to support angler and hunter activity
 - 5.4 improve the 'user pays, user says' system and how Fish and Game make decisions, including how it considers non-hunting and fishing interests in decision-making
 - 5.5 strengthen checks and balances to improve accountabilities and transparency and provide adequate backstops so that the responsible Minister can intervene as necessary in exceptional circumstances
 - 5.6 more generally modernise the organisation in line with other entities to support further efficiencies and effectiveness.
- 6 **Agree** to the proposals at **Appendix One**.
- 7 **Agree** to delegate authority to the Minister of Hunting and Fishing to approve other necessary minor and technical changes within the overall policy intent I have described in this paper.
- 8 **Note** that the Fish and Game Governance and Organisational Improvements Amendment Bill bid is a category five priority (referred to select committee in 2025) for the 2025 Legislative Programme.

Authorised for lodgement

IN C O N F I D E N C E

Hon James Meager

Minister for Hunting and Fishing

DRAFT

IN C O N F I D E N C E

Appendix One – Schedule of Legislative Amendments

Key to abbreviations used in table:

NZC = New Zealand Fish and Game Council; **FGC** = Fish and Game Council; **CA** = Conservation Act 1987; **FFR** = Freshwater Fisheries Regulations 1983; **FGCER** = Fish and Game Council Elections Regulations 1990; **SFGMP** = sports fish and game management plan; **WA** = Wildlife Act 1953; **WR** = Wildlife Regulations 1955; **TFR** = Taupo Fishery Regulations 2004

No.	Summary of problem	Summary of remedy
	Functions	
	Nationwide policy consistency	
1.	<i>General</i> NZC is responsible for coordinating the work of FGCs but has no function to develop policies for the work of FGCs. This impedes national coordination of work by FGCs.	The NZC to have the ability to develop national policies for the work of Fish and Game, both NZC and FGCs. These would be non-binding (except for certain specified areas (described below)) to maintain the independence of FGCs in their regional work.
2.	<i>Compliance</i> Each FGC can decide its own policy for ensuring compliance with hunting and fishing regulations. This creates inconsistency of treatment across different regions, and raises questions about natural justice.	<p>To create consistency of approach across councils, the NZC, in consultation with FGCs, to set policy binding on FGCs for things such as:</p> <ul style="list-style-type: none"> • How compliance activity is conducted (e.g., standards of behaviour and approach) • How compliance activity is reported • Spatial coverage of compliance work • How to apply any approved infringement policy in different circumstances (the Minister to continue to approve any infringement policy as set out in s.26HA(2) of CA). <p>The NZC, in consultation with FGCs, to set the minimum levels of compliance work undertaken by FGCs for this key activity.</p>

IN CONFIDENCE

3.	<p><i>Monitoring</i></p> <p>Each FGC can decide its own policy for resource and activity monitoring in its region, sometimes resulting in incomplete or inconsistent national-level data. This impedes national coordination and prioritisation of effort.</p>	<p>To create consistency of approach for monitoring activity (as set out in s.26Q(1)(a) of the CA) the NZC, in consultation with FGCs, to set policy binding on FGCs for things such as:</p> <ul style="list-style-type: none"> • Standardised methodologies for conducting monitoring activity – including monitoring of sports fish and game resources, licence holder activity and satisfaction, and habitat condition • Spatial coverage of different types of monitoring • Standardised reporting of data. <p>The NZC, in consultation with FGCs, to set the minimum levels of monitoring work undertaken by FGCs for this key activity.</p>
4.	<p><i>Corporate</i></p> <p>Each FGC sets its own corporate, business, and personnel policies and processes, leading to duplication of effort and inconsistent standards and staff salaries across regions.</p>	<p>To create consistency of approach and systems for corporate activity, the NZC, in consultation with FGCs, to set policy binding on FGCs for things such as:</p> <ul style="list-style-type: none"> • Business processes and systems • Corporate policies • Health and safety (minimum standards) • Personnel policies (including staff conditions). <p>This will ensure consistency of approach across the organisation, providing greater efficiencies, and enabling better planning and staff management.</p>
5.	<p><i>Advocacy</i></p> <p>Some FGC advocacy work and court action has been contrary to wider Fish and Game interests, but the NZC has no way to intervene.</p>	<p>To create consistency of approach across councils and protect the interests of Fish and Game as a whole, the NZC, in consultation with FGCs, to set policy binding on FGCs for things such as:</p>

		<ul style="list-style-type: none"> • General advocacy undertaken by FGCs to advance the interests and aspirations of anglers and hunters (including, potentially, a national advocacy strategy) • Advocacy undertaken by FGCs via statutory planning processes to advance the interests and aspirations of anglers and hunters • FGC appearances before courts and tribunals. <p>To ensure court action is timely but well considered, FGC court action to be subject to the direction of the NZC, except when the FGC is challenging the NZC or another FGC.</p> <p>NZC to be empowered to intervene in local advocacy actions undertaken by FGCs when such actions are contrary to the agreed-upon binding advocacy policy.</p>
6.	<p><i>Sports Fish and Game Management Plans</i></p> <p>NZC has no ability to determine policy content of sports fish and game management plans (SFGMPS) in the areas where the NZC can set policy binding on FGCs (see above).</p>	<p>To create consistency of approach across councils, the NZC, in consultation with FGCs, to determine minimum provisions for inclusion in draft SFGMPs prepared by FGCs in relation to:</p> <ul style="list-style-type: none"> • compliance and enforcement • monitoring of resources, and licence holder activity and satisfaction • statutory planning processes.
	Functional support	
7.	<p><i>NZC Work Plan</i></p> <p>The NZC is to have new operational functions and responsibilities, and appropriate transparency and accountability is needed.</p>	<p>The NZC to be required to prepare an annual operational work plan (as FGCs do currently). This will deliver transparency and accountability by providing outcomes and measures to report against (see also rows below).</p>

IN CONFIDENCE

8.	<i>Specialist staff</i> The small size of many FGCs often prevents the engagement of specialist staff, and sharing staff between regions is administratively difficult.	The NZC to have a new function to provide specialist expertise to FGCs – such as planners, ecologists, scientists, lawyers, accountants, etc – who can work across several regions. Such staff may be located in the regions they work.
9.	<i>Servicing and reporting</i> The servicing of councillors and business planning and performance reporting need to receive adequate attention and support.	<p>The NZC to have a new function to determine, in consultation with FGCs, minimum work programmes to be implemented by FGCs in relation to the key activities of:</p> <ul style="list-style-type: none"> • the servicing of FGC meetings and support to councillors • annual business planning and performance monitoring. <p>The NZC to have a responsibility to ensure that FGC minimum work programmes for all key activities (including rows 2 and 3 above) are adequately funded.</p>
10.	<i>Templates</i> Each FGC may decide its own structure and format for work planning, annual reporting, and SFGMPs, which can lead to inconsistencies across councils and make comparisons difficult.	The NZC to have a new function to determine the forms and templates to be used by FGCs in all work planning, performance reporting, and SFGMPs.
Issuing of licences		
11.	FGCs currently issue all licences, and collect all revenue, requiring multiple handling of money via inefficient redistribution mechanisms.	<p>The NZC to issue all sports fishing and game hunting licences and receive all fee revenue.</p> <p>Licences are currently sold via a central website – licence holders buy directly from website, and licence sales agents sell via a portal to this website. This method of selling licences would continue. The website is operated by a specialist contractor.</p> <p>To maintain clarity, rename “Special licences” as “Special permits” in FFR.</p>

IN CONFIDENCE

IN CONFIDENCE

	Allocation of funding	
12.	<p>Allocation of funding (derived from licence fee revenue) among FGCs has been problematic since licences issued by FGCs became valid nationwide.</p> <p>Annual allocation of funding to each FGC (after redistribution by NZC) is based largely on the level of funding received by each FGC in previous years. This means management effort is not always directed to areas of greatest potential benefit to licence holders.</p>	<p>Allocation of funding among FGCs to be determined by the NZC according to a funding model set in secondary legislation (<i>regulations or Gazette to be determined</i>).</p> <p>The funding model (yet to be fully developed) is expected to direct the bulk of funding to FGC regions in proportion to the level of licence holder activity in each region, while ensuring funding for key activities (see above), national research, and NZC work, and include a contestable fund.</p> <p>The NZC to have a new function to develop, in consultation with FGCs, a financial strategy.</p>
	Transparency and reporting	
	Performance reporting	
13.	<p><i>Performance measures</i></p> <p>Operational work planning lacks accountability and transparency, and is not aligned with existing annual reporting requirements for Fish and Game</p>	<p>NZC and FGC annual operational work plans to be required to include:</p> <ul style="list-style-type: none"> • A concise explanation of what each class of outputs is intended to achieve • A concise explanation of how the performance of each class of outputs will be assessed. <p>NZC and FGC annual operational work plans to be considered final once dated and signed by the Chair and the Manager of the respective FGC or NZC.</p> <p>NZC and FGC annual operational work plans must be consistent with any approved SFGMP and any binding policy set by the NZC.</p>

IN CONFIDENCE

14.	<i>Report against performance</i> NZC and FGC annual reporting in CA does not align with NZC and FGC requirements specified in Public Finance Act 1989 and Crown Entities Act 2004.	NZC and FGC annual reports to each contain statements of performance against the performance expectations in their annual operating plan. Each FGC annual report to be dated and signed by the FGC Chair and FGC Manager before submission to NZC.
15.	<i>Full reporting on enforcement</i> FGCs must report annually on enforcement activity under an infringements system, but not on actions leading to court action (complaints from public, adherence to procedures, etc)	Requirements on FGCs to report annually on enforcement work under any infringement system to be expanded to cover all enforcement work.
16.	<i>Combined annual report</i> NZC and each FGC is independent and provides its own separate annual report to Minister, none of which are reviewed individually, or across Fish and Game as a whole. (For example, there is no equivalent to the annual select committee reviews of Crown agencies.)	The NZC to compile NZC and FGC annual reports (currently 13 in all) into a single annual report for the Minister to present to the House. The NZC combined annual report be required to: <ul style="list-style-type: none"> • Contain the statements of performance against performance expectations for the NZC and each FGC (as provided by each FGC); and • Summarise any discrepancies between the performance and performance expectations of the NZC and each FGC; and • Provide an overall review of Fish and Game (all 13 councils) as a whole. The NZC combined annual report to be dated and signed by the NZC Chair and NZC Manager before submission to the Minister.
17.	<i>Information to enable coordination</i> The NZC has been hindered in its coordination role by FGCs declining to provide information necessary for coordination	The NZC to have a clear oversight function and a new power to require Fish and Game Councils to provide information on request (for the functions where the NZC sets binding policy) related to: <ul style="list-style-type: none"> • financial information

IN CONFIDENCE

	<p>and oversight of Fish and Game work. FGCs have not been fully informed of NZC activities.</p>	<ul style="list-style-type: none"> • performance reporting information • compliance information (including actions of enforcement officers) • monitoring information and data • matters relating to adherence with corporate policies, including personnel policies (subject to Privacy Act considerations for staff employed by the FGC rather than the NZC). <p>FGCs to have a power to require the NZC to provide information on request (for the functions where the NZC sets binding policy) related to:</p> <ul style="list-style-type: none"> • financial information • performance reporting information • compliance information (including actions of enforcement officers) • monitoring information and data • matters relating to adherence with corporate policies, including personnel policies (subject to Privacy Act considerations for staff employed by the FGC rather than the NZC) • matters relating to the development by the NZC of binding policies.
18.	<p><i>Information to inform audits</i></p> <p>NZC has a function to audit the activities of FGCs but lacks the necessary power to require FGCs to provide financial information to NZC, thus preventing NZC fulfilling its role.</p>	<p>The NZC to have a function to audit the activities and performance of FGCs, and of Fish and Game as a whole.</p> <p>An FGC must provide any information (including financial, performance, or other information on its activities, assets or liabilities) that is requested by the NZC as part of an audit.</p>

IN CONFIDENCE

	Reporting to DOC	
19.	DOC is not always aware of circumstances and results of legal proceedings under CA, despite having accountability for operation of Act	NZC and FGCs to be required to report to DOC on circumstances and results of all legal proceedings made under the CA, as is currently required under WA.
	Modernising Fish and Game	
20.	<i>Communication with licence holders</i> Fish and Game can have difficulty communicating with licence holders on matters of interest, including consultation on proposed Anglers and Game Notice conditions, and advising of SFGMP reviews.	Provide that, in addition to newspapers, Fish and Game may place public notices and consult with licence holders via electronic methods, Internet sites (with free public access) and by emailing eligible voters (who have provided an email address when buying a licence) or other electronic notification (e.g. subscription via website).
21.	<i>Online meetings</i> There is uncertainty about legality of NZC and FGC meetings held online.	Allow NZC and FGC meetings to be held online, and votes taken (including electronically), as if meeting was in person.
22.	<i>Role clarity</i> There has been uncertainty within Fish and Game about the NZC's role in processes for approvals of SFGMPs, Anglers Notices, and Open Season for Game Notices. Anglers Notices and Game Notices are becoming unnecessarily complex and different between regions, but there is also a need to maintain FGC independence over local resource management decisions.	NZC to collate and edit (form, readability and useability only) Anglers and Game Notices before submitting them to the Minister for approval. NZC may provide independent advice to the Minister on the sustainability (e.g. will the resource become depleted), suitability (e.g. is there a good rationale for a particular condition), and consistency (within and between regions) of Anglers and Game notice conditions recommended to the Minister by FGCs. However, the NZC will not be able to amend or decline the substance of Anglers and Game notices prepared by FGCs before submission to Minister. NZC may provide independent advice to the Minister on the suitability of provisions in draft SFGMPs submitted to the Minister for approval by FGCs.
	Ministerial powers	

IN CONFIDENCE

23.	<i>Review function</i> Minister has no explicit function to review the operations or performance of FGCs and NZC	Minister to have a function to review operations and performance of Fish and Game as a whole, or individual FGCs or the NZC at any time. NZC and FGC to be required to provide any information requested by the Minister as part of a review, including any financial, performance, or other information on their activities, assets, or liabilities.
24.	<i>Anglers Notice amendment</i> Minister cannot amend an Anglers Notice before approving it – unlike for a Game Notice where the Minister can amend before approving	Minister to be able to either approve a draft Anglers Notice or amend the draft notice before approving.
25.	<i>Game Notice amendment</i> Minister cannot amend an approved Game Notice until after season begins.	Minister to be able to amend an approved Game Notice before or during the Open Season that it relates to.
Governance		
Eligibility to vote in elections		
26.	<i>Everyone may vote</i> Only adult whole-season licence holders may currently vote; this excludes many licence holder interests. Licence holders must also ask to be listed on the electoral roll, creating an impediment to future participation in elections.	All New Zealand residents who have held an adult sports fishing or game bird hunting licence in the three years leading up to a Fish and Game election to be eligible to vote in that election. Buyers of licences to be automatically included on electoral roll, rather than needing to ask to be on roll. The partner of the holder of a family whole-season licence to be able to vote in FGC elections.
27.	<i>One vote only</i> Licence holders currently vote in the regions they buy their whole-season licence(s) from, and if they buy their fishing	Licence buyers to be required to select a voting region for election purposes when buying a licence, and no longer able to vote in two regions.

IN C O N F I D E N C E

	and hunting licences in different regions, they may vote in elections for two regions.	Where a person purchases more than one licence to hunt or fish in the three years before an election, the FGC region specified at the time the most recent licence was purchased shall be the region they are entitled to vote in. Where a region is to be divided at the time of an election (as part of a reorganisation of regions and boundaries), the NZC must ask eligible voters for that region which new region they wish to vote in.
28.	<i>No subregions</i> The current subregions do not deliver local representation as voters vote for candidates in all subregions and a candidate can stand anywhere.	Remove provisions for Fish and Game regions to have subregions.
29.	<i>Electoral roll maintenance</i> FGCs must maintain electoral rolls, but in practice this has long been done centrally	NZC to maintain electoral rolls rather than FGCs.
	Elections procedures	
30.	<i>Allow electronic voting</i> The CA provides for electronic (online) voting, but the FGCER do not. The requirement for alphabetical listings on ballot papers favours candidates with surnames earlier in alphabet, affecting election outcomes.	Electronic voting to be provided for in regulations. Voting papers able to be provided via email and Internet links, in addition to via post. Remove requirement for election candidates to be listed alphabetically by surname on ballot papers.
31.	<i>Publicity for elections and rolls</i> Elections and results currently advertised only via newspapers. Personal contact details are currently publicly available via electoral roll.	Elections and election results to be advertised also via electronic methods, Internet sites (with free public access), and by emailing eligible voters (who have provided an email address when buying a licence) or other electronic notification (e.g. subscription via website).

IN CONFIDENCE

		Align voter privacy with modern expectations and privacy principles by making elector contact details (postal and email addresses) included on electoral roll no longer publicly available.
32.	<i>Keeping elections aligned</i> The discharge of a FGC would currently result in that FGC having future elections at different times to all other FGC elections	FGC election timing to be kept aligned across all regions in the event of a council being discharged by Minister. A council elected to replace a discharged council to hold office only until the next three-yearly elections (unless this would result in a term of less than 1 year, in which case the term shall be until the end of the term and for an additional 3 years.
	NZ Council membership	
33.	NZC will have increased functions and responsibilities. FGCs may replace their NZC representative at any time, which leads to NZC members focusing on maximising benefits for their FGC, not all licence holders nationally. NZC may replace its Chair at any time for any reason, creating policy continuity risks.	The NZC to be comprised of the Chairs of the FGCs, in recognition of the additional roles and responsibilities. To deter FGCs changing their NZC representative frequently (creating policy and governance continuity difficulties): <ul style="list-style-type: none"> • If a FGC replaces its Chair, the FGC must advise the NZC and Minister in writing of that replacement and the reasons for that replacement • If the NZC replaces its chair, the NZC must advise the Minister in writing of that replacement and the reasons for that replacement. The NZC and FGCs to appoint their own Chairs as currently.
	FGC membership	
34.	<i>Council size</i> The current size of 12 councillors per FGC is too large given the level of decision making required.	Each FGC to have up to eight elected members (not including co-opted or appointed members).

IN CONFIDENCE

35.	<p><i>Include wider interests</i> Criteria for FGC membership are too narrow, and exclude many anglers and hunters from being councillors (and exclude the interests they might represent)</p>	<p>Any resident adult who has held a sports fishing or game bird hunting licence in the three years prior to an election to be eligible for election to a FGC.</p>
36.	<p><i>Updated "fit and proper person" test</i> Current criteria whereby people are deemed unsuitable to hold FGC membership are too narrow – convictions for offences involving firearms, freshwater habitat, or any freshwater fish are as relevant as existing matters; matters from s.30 of Crown Entities Act 2004 are also relevant.</p>	<p>A person is to be not eligible to stand for election to a FGC (or remain a councillor if in office) if they:</p> <ul style="list-style-type: none"> • Are an undischarged bankrupt • Have been convicted of an offence involving freshwater fish, or game, or protected wildlife, or freshwater habitat, or the use of firearms (whether an offence under the CA or any other Act) • Have been convicted of an offence punishable by imprisonment for a term of 2 years or more, or who has been sentenced to imprisonment for any other offence, unless that person has obtained a pardon, served the sentence, or otherwise suffered the penalty imposed on the person • Are disqualified under another Act. <p>MoJ Criminal record check and public register check to be required of all election candidates to confirm eligibility prior to election (paid for by the FGC and facilitated by returning officer). Candidates to also sign a statement to that effect.</p> <p>(Note that committing an <u>infringement</u> offence would not prevent someone from standing for election.)</p>
37.	<p><i>Councillors not to be employees</i> Allowing people to be both councillors and employees can create accountability problems</p>	<p>No FGC or NZC councillor to be able to be an FGC or NZC employee while the councillor is in office.</p>

IN CONFIDENCE

IN CONFIDENCE

38.	<i>Avoiding immediate re-election</i> If a person is removed from a FGC by the Minister there is nothing preventing them being immediately re-elected to office.	If an elected councillor has been removed from office by the Minister, that person is to be ineligible to be a FGC member for a period of three years from the date of removal (i.e a full term stand-down).
39.	<i>Declaration of previous removal</i> If a person has previously been removed from office by the Minister, there is no requirement for electors to be advised of this.	If an elected councillor has previously been removed from office by the Minister (for any reason) and that person stands again for election, they must advise electors of the previous removal.
40.	<i>Remedying skills gaps</i> Elected FGCs sometimes lack the full range of skills required for good decision-making	Minister may appoint up to two members (additional to elected members) onto a FGC. Such appointed members to be entitled to vote on any matter, but may not be elected as the FGC chair by the council members.
41.	<i>Transparency of resignation</i> Any FGC member may resign by writing to Minister only, and NZC may not be immediately aware of situation and potential issues.	Any member of a FGC may at any time resign from a FGC by writing addressed to the Minister, signed and dated, with a copy to the FGC and NZC.
42.	<i>Non-democratic process to fill vacancies</i> Process for replacing elected FGC members who resign is not democratic.	At any election, all vacant positions must be filled unless there are fewer eligible candidates standing than vacancies. A FGC can choose to fill a vacancy or vacancies, or not, by election at any time during its term if the number of its members is below eight but at or above a minimum of three. A FGC must hold an election to fill all vacant positions if FGC membership falls below the minimum number of three members.
43.	<i>Member of multiple FGCs</i> It is possible for someone to being elected as a member of two FGCs at the same time, and potentially the chair of both leading to potential uncertainty about NZC voting rights.	Fish and Game councillors to be prohibited from serving on more than one Fish and Game Council at the same time.

IN CONFIDENCE

IN CONFIDENCE

	Behaviour while in office	
44.	<i>Removal of councillor for "just cause"</i> Circumstances under which Minister may remove a councillor from office are outdated and not aligned with similar legislation	The Minister to be able to remove any member of a FGC from office at any time for any "just cause", including misconduct, inability to perform the functions of office, neglect of duty, and breach of any of the collective duties of the FGC or NZC or the individual duties of FGC or NZC members (depending on the seriousness of the breach).
45.	<i>Standards for conduct of meetings and councillors</i> Conduct of FGC meetings and behaviour of some councillors has often been less than optimal, including in relation to conflicts of interest	<p>Ensure council meetings and councillor conduct is consistent with good public entity standards and practice, including noting and taking account of conflicts of interest, by enabling the Minister to establish by notice in the <i>Gazette</i>:</p> <ul style="list-style-type: none"> • rules for the conduct of all NZC and FGC meetings • rules for the conduct of all NZC and FGC councillors while performing their duties. <p>Compliance with these rules to be mandatory for all council meetings and councillors.</p>
	Fees and expenses	
46.	<i>Expenses</i> FGC and NZC members cannot be reimbursed for expenses.	Enable NZC and FGC councillors to be reimbursed for actual and reasonable expenses (funded from licence fee revenue) incurred in performing functions as a councillor.
47.	<i>Fees</i> FGC councillors appointed by the Minister would receive no remuneration for their services as councillors.	Enable Ministerial appointees to FGCs to be paid meeting fees in accordance with Cabinet Fees Framework (funded from licence fee revenue). Elected FGC councillors and NZC members to continue to be volunteers.
48.	<i>No compensation for loss of office</i> Remove any entitlement to compensation or payment if no longer a council member.	An NZC or FGC councillor who leaves or is removed from their position as a councillor shall cease to be paid and will not be entitled to compensation for loss of office.

IN CONFIDENCE

IN CONFIDENCE

Mergers of Fish and Game Regions		
49.	<p><i>Enable regional mergers</i></p> <p>Currently, mergers of FGC regions are not feasible as the CA does not have the provisions needed to manage assets, end councillor terms of office, etc.</p>	<p>Minister to have power to alter or merger FGC regions, and consider requests for mergers from FGCs (no change from current powers).</p> <p>When regions are merged or altered:</p> <ul style="list-style-type: none"> • The Minister to be able to allocate and transfer assets as Minister considers appropriate. • All proceedings by or against an FGC may be continued. • Land Registrars be empowered to give effect to any transfer of land. • All fishing and hunting licences and SFGMPs in respect of affected regions to continue in force until their expiry, replacement o cancellation. <p>All councillors of a region that is abolished to continue to hold office until the end of the three-year term of office and (for clarity) at the election the old council(s) and region(s) cease to exist, and new ones come into existence.</p>
50.	<p><i>Minimum number of regions</i></p> <p>Too many regional mergers could leave NZC with too few councillors, or FGCs with insufficient local knowledge</p>	<p>Number of Fish and Game regions to be no fewer than 7 and no more than 12.</p>
Needs of other interests		
51.	<p><i>Treaty partners</i></p> <p>Treaty partners sometimes wish the periodic transfer of sports fish to isolated fisheries to cease, to meet cultural objectives. Minister responsible for Fish and Game currently has no ability to prevent this.</p>	<p>The Minister to have a new power to prohibit the transfer of live sports fish to a location where the species already exists.</p>

IN CONFIDENCE

IN CONFIDENCE

52.	FGC management to maximise angler and hunter benefit often overrides the needs of other interests, and has sometimes impacted aviation safety and threatened native fish	<p>The FGC function to manage, maintain, and enhance sports fish and game resources in the recreational interests of anglers and hunters to become <u>subject to</u> the following:</p> <ul style="list-style-type: none"> • ensuring aviation safety is not compromised • ensuring the conservation of isolated populations of threatened native fish is not impeded • having regard to the impact of management on other natural resources and other users of the habitat
53.	Similar to the above, the current requirement for sports fish and game management plans (SFGMPs) to maximise angler and hunter opportunities often overrides the needs of other interests	<p>Have new requirement that SFGMPs must include provisions to:</p> <ul style="list-style-type: none"> • ensure aviation safety is not compromised • ensure the conservation of isolated populations of threatened native fish is not impeded • describe how any conflict between sports fish and game management and “other natural resources and the needs of other users of the habitat” (i.e. non-hunting interests) will be managed.
54.	<i>Require compliance with policy</i> FGCs have not always complied with their approved sports fish and game management plans and there has been no way to make them comply.	<p>Have a clear requirement that FGCs and NZC must comply with:</p> <ul style="list-style-type: none"> • any approved SFGMPs • any General Policies under conservation legislation • any binding policy determined by the NZC (applies to FGCs only).
55.	<i>Empowered to manage game</i> FGCs have a function to manage game birds but lack the powers needed to manage game birds impacting farm crops	<p>Director-General of Conservation to be able to delegate to FGCs the DG's powers to directly manage game birds impacting crops, etc, subject to any conditions specified by the DG.</p>

IN CONFIDENCE

IN CONFIDENCE

	or aviation safety. Requiring case by case permits from DOC is impractical.	The DG would be able to revoke the delegation if an FGC used the delegation inappropriately or in ways contrary to any conditions required by the DG.
56.	<i>Enable establishment of commercial preserves</i> Authorisation of commercial upland game preserves currently requires an Order in Council, which is an unnecessary level of process.	Commercial upland game preserves to be authorised by Notice (in the same way that non-commercial preserves are authorised).
Other matters and removal of spent provisions		
57.	<i>Creation of Separate Act</i> There is a need to better recognise Fish and Game's role as a key organisation in the hunting and fishing sector.	Create a standalone Fish and Game Act, maintaining all necessary linkages with CA and other legislation (as modified by the reforms elsewhere in this schedule) but making no other changes to policy.
58.	<i>Appointment of staff</i> The CA has NZC and FGC councillors appointing all staff, not only NZC and FGC managers	Clarify that elected councillors appoint managers, and that managers appoint other staff (making current practice lawful) Appointments of managers and staff to be subject to staff policy determined by NZC (see above).
59.	<i>Use of money from court fines</i> Section 46(7A)(b) of CA largely restricts the uses of fines recovered to the operation of hatcheries.	Align with similar provisions in WA such that money from court fines under CA may be applied for purpose of any FGC functions.
60.	<i>Remedy appointment gap</i> Sections 26FA(1) and (2) of CA allows appointment for the purposes of the CA but not the Wildlife Act.	Allow appointments of enforcement officers for the purposes of WA also.
61.	<i>Update headings</i> Sections 26H and 26W of CA call NZC and FGCs "Crown Entities" when they are no longer such.	Update cross-headings to reflect current legislation (Public Entity status).

62.	<i>Remove transition provisions</i> Provisions relating to Transitional Fish and Game Council became spent over 30 years ago.	Remove spent provisions relating to transitional Fish and Game Councils from FGCER.
-----	--	---

Regulatory Impact Statement: Strengthening and Modernising Fish and Game New Zealand



Decision sought	Analysis produced to inform final/in-principle Cabinet decisions on proposed amendments to the Conservation Act 1987 aimed at strengthening and modernising Fish and Game New Zealand.
Agency responsible	Department of Conservation
Proposing Ministers	Minister for Hunting and Fishing
Date finalised	XX April 2025
The Minister for Hunting and Fishing aims to strengthen and modernise Fish and Game New Zealand (F&G) by implementing good governance practices, improving transparency, and rebalancing its key functions. These reforms will boost F&G's effectiveness, ensure robust checks and balances, add value for licence holders, and make it easier for New Zealanders to engage in game bird hunting and fishing.	

Summary: Problem definition and options

F&G is made up of 12 regional councils and one national council

Fish and Game Councils (FGCs) were established in 1990 under the Conservation Act 1987 to manage freshwater sports fishing and game bird hunting in mainland New Zealand.¹ There are 12 regional FGCs and a national coordinating body, the New Zealand Fish and Game Council (NZC), which collectively make up Fish and Game New Zealand (F&G). All F&G councils are public entities listed in Schedule 4 of the Public Finance Act 1989 and are subject to aspects of the Crown Entities Act 2004. F&G is funded primarily from licence fees and does not receive government funds. The Department of Conservation (DOC) has regulatory stewardship of the sports fish and game bird management system under the Act.

There have been organisational issues within F&G since its beginnings

F&G has a long history in New Zealand and role managing sports fish and game birds for hunters and anglers. However, well-documented challenges relating to governance and regulatory practices have eroded trust in the organisation. Several reviews along with media and F&G commentary, have shown that legislative settings do not encourage good governance or provide clear roles and responsibilities.

This impacts F&G's effectiveness and efficiency. F&G's relationships with other users of natural resources is also affected. This affects licence holder experience and value for money. Non-legislative improvements have fallen short; legislative change is now required for F&G to modernise and improve.

A modernised F&G will deliver value for money for licence holders

The current federal structure means FGCs and the NZC lack connectedness, with unnecessary duplication of effort and different approaches or investment in similar activities undermining cohesiveness within the organisation. Ministers have limited backstop powers, inconsistent with similar legislation for like entities. These issues ultimately affect hunters and anglers, diminishing the value they receive from their licence fees. By reducing unnecessary duplication and provide for other efficiencies, F&G can offer better value to licence holders, redirecting funds to better support angling and game bird outcomes. This could encourage more New Zealanders and overseas visitors to engage in hunting and fishing, boosting regional economic activity and further increasing funds for the sports.

The Government is refining current settings rather than opting for a major restructure

The proposed amendments will not change F&G's purpose or overall functions as established in the Conservation Act.² Instead, they aim to improve cohesion, clarify powers and functions within the organisation, increase transparency, and align F&G with modern public entity requirements.

Success may take a few years to see

To measure the reforms' success or failure over time, several key indicators and metrics will be used, including licence sales/revenue, cost efficiency, licence holder satisfaction, economic impact, organisational cohesion, and regulatory compliance. Measuring change outcomes can be achieved primarily through existing licence holder activity surveys and annual F&G performance reports.

¹ Except for the Taupō trout fishery, which is managed by DOC.

² Section 26B(1).

The Minister proposes legislative amendments to address the issues within F&Gs

While F&G's non-legislative changes following the latest review may bring some improvements, they cannot address the major organisational issues identified. The Government must now ensure these systemic issues are resolved by making the regulatory system fit-for-purpose. This will assure licence holders and the public that hunting and angling resources are well managed.

The change proposals aim to modernise F&G and deliver better outcomes for licence holders

The Minister's preferred framework includes:

- Balancing powers and responsibilities effectively between FGCs and the NZC, better supporting local decision making for local hunting and fishing activities and national decisions to provide cohesiveness and organisational direction.
- Putting licence holders at the centre of the rationale for change.
- Retaining a "user pays, user says" approach.³
- Aligning F&G with contemporary governance standards of comparable public entities.

These changes will benefit the entire system

The reforms will:

- Provide better value for money for licence holders.
- Improve engagement and participation by licence holders.
- Foster a shared purpose and more effective management of F&G resources and habitats.
- Enhance the efficiency and effectiveness of F&G operations across New Zealand.
- Increase transparency and establish proper checks and balances between FGCs and the NZC.
- Improve reporting and accountability.

Without legislative change, poor governance practices, inefficiencies, and internal discord will likely continue. There will be no incentive to improve policies and processes, potentially leading F&G to further conflicts with local communities and mismanagement of hunting and angling resources.

The Minister preferred a targeted engagement approach

Several reviews of F&G since 1990 have informed the current reforms. These are discussed in Section 1. In November 2024, the Minister sent letters with high-level questions to all FGCs, the NZC, and Post-Settlement Governance Entities (PSGEs) with F&G references in their Treaty settlements with the Crown. The Minister also met individually with all FGCs in early 2025. These activities informed policy decisions.

Although wider engagement with licence holders and the community was not conducted, their views are captured in earlier reports and reviews (see Section 1). Despite generally low engagement from eligible licence holders in FGC elections, this provided valuable input from the FGCs as their representatives.

The targeted approach has its limitations

Wider stakeholders, including licence holders and other users of shared resources (e.g., farmers), will be able to make submissions on the Amendment Bill at the select committee stage.

Responses from FGCs and PSGEs

FGCs showed general agreement there was a need for change, with a spectrum of views on how this could be achieved. Councillors focussed primarily on the importance of maintaining and supporting regional decision making, opportunities for efficiencies on some administrative activities, and change to improve governance and elections. The main concern expressed was around a larger role for the NZC increasing bureaucracy and hampering local independence. Responses from iwi and hapū included one written response from **9(2)(g)(i)** and three verbal responses (Section 1).

³ That is, licence holders (who pay for their licences) should have a say in how the organisation is run and how the fish and game resources are managed.

Are the preferred options in the Cabinet paper the same as preferred options in the RIS?

The Minister has agreed with the approach taken and key decisions to support reforms, with a different approach only on some minor issues.

- DOC recommended that Ministerial appointees were made only for specific reasons set out in legislation. The Minister preferred an alternative option to appoint for any reason. In either case, Ministerial appointments are intended as a backstop measure only, and it is likely this change will make only a minor difference to how appointments will work in practice. Specifying reasons in legislation largely provides clarity. DOC advised responsibility for the actions of appointees would fall to the Minister.
- DOC suggested 'up to 7' councillors per FGC and the NZC, but the Minister preferred 'up to 8', after hearing feedback largely in support of this from F&G meetings. DOC considers this minor and is in support: 7 was recommended to easily break tied votes, but Chairs currently have the power to do this.

Summary: Minister's preferred options in the Cabinet paper

Costs (Core information)

One-off: F&G will incur a direct, one-off cost to establish new procedures and potentially hire staff to help with reforms and to develop a new financial strategy and funding allocation model.

Ongoing: F&G will incur minimal administrative costs to vet all election candidates at the pre-election stage.

When made in exception circumstances, Ministerial appointees will be paid a fee for their time on FGCs. This fee would be between \$165 and \$225 per meeting for attending FGC meetings, or a flat annual fee of \$7,161 - \$15,615 if attending the NZC meetings. This would fall to F&G to fund.

No Additional Funds Required: DOC, the wider government, and consumers will not require additional funds, and no public funding will be necessary for F&G. Reforms will be funded from existing and future F&G revenue.

Benefits (Core information)

Value for money and a better experience: Licence holders will receive better value for their money and enjoy improved hunting and fishing experiences.

Responsive budgets: F&G will benefit from more responsive budgets that meet actual needs.

Cooperative work: The NZC will work cooperatively with FGCs to develop a cohesive organisation that better serves hunters, anglers, and the community.

Informed advice: DOC will gain a clearer view of F&G operations, enabling it to provide more informed advice to the Minister.

Regulatory confidence: The Crown will have greater confidence in F&G's ability to fulfil its regulatory obligations.

Community benefits: The community will benefit from F&G being more responsive to the needs of other resource users.

Balance of benefits and costs (Core information)

The Minister's preferred options are likely to outweigh the costs to F&G considering qualitative evidence.

Implementation (Core information)

Enactment and phasing: The reform will be enacted in approximately June 2026 and phased in from July 2026. The NZC and FGCs will need to prepare and collaborate to ensure effective implementation. Developing secondary legislation will be crucial during the transition period.

Awareness and autonomy: DOC will ensure F&G are aware of the changes. The reforms will rebalance roles, with FGCs retaining autonomy and the Minister's powers extended but remaining "at arm's-length." DOC's role in implementation will be indirect but critical as an advisor.

Support and phasing: DOC will work with the NZC to determine necessary support and risk mitigation. Reforms will be phased, with adjustments to councillors at the next election and budget process changes in subsequent cycles. The transition is expected to be complex.

Implementation responsibility: F&G will be responsible for implementing the changes. The NZC will engage with FGCs on how to implement the changes.

Reporting and monitoring: The NZC will report to the Minister on progress and any issues that arise. Improvements in F&G's annual report structures will enable DOC to monitor performance.

Limitations and constraints on analysis (Core information)

Non-regulatory changes out of scope

Non-regulatory changes are out of scope as they have proven insufficient to address problems rooted in existing legislative settings over 35 years.

Building on previous policy decisions, this RIS documents a series of decisions rather than presenting a single option with analysis

The current Minister for Hunting and Fishing, Minister Meager, is building on the policy decisions made by the former Minister for Hunting and Fishing, Minister McClay. Minister Meager has added to these decisions and plans to recommend them to Cabinet in the second quarter of 2025.

Both Ministers set clear limits on the scope of work:

- Prioritise value for money for the licence holder.
- Refocus rather than fundamentally review F&G.
- Ensure local knowledge in decision-making.
- Retain "arms-length" features from the government.
- Maintain regional autonomy and flexibility in FGC decision-making as much as possible.
- Complete changes within the current Parliamentary term.

Limited engagement impacting analysis

Limited engagement with licence holders and other stakeholders impacted the analysis. Wider consultation could have provided more insights, especially from female licence holders who are vastly underrepresented in F&G, and groups like Federated Farmers.

Confidence in proposals despite limitations

Despite limitations, DOC is confident in the quality of the proposals due to comprehensive examinations over many years, including the most recent, the 2021 Governance Review of New Zealand Fish and Game.⁴ Most FGCs support the need for change, indicating general support for the proposals.

Alignment with the NZC's strategy

The proposed legislative changes align with the NZC's 2023-2028 strategy, which came from that governance review, assuming non-legislative measures will proceed as planned and support the regulatory changes.

Consequences of inaction

Without intervention, poor governance practices, duplication of effort, inefficiencies, and internal discord are likely to continue, with no incentive to improve policies and processes, which ultimately negatively impacts licence holders.

I have read the Regulatory Impact Statement and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the preferred option.

Responsible Manager(s) signature: _____

Nicola Molloy

Policy Manager

14 April 2025

⁴ "Review of the Governance of Fish and Game New Zealand and the Regional Fish and Game Councils", 2021. Clark, B and Mills, J. Wellington.

Quality Assurance Statement	
Reviewing Agency:	QA rating: [Meets, partially meets, does not meet]
Panel Comment:	

DRAFT

Section 1: Diagnosing the policy problem

Context behind the policy problem

1. Game bird hunting and freshwater sports fishing have been significant activities in New Zealand since early European settlement.

Historical background

2. In the 1860s, acclimatisation societies introduced various exotic species like salmon, trout, deer, pheasant, and mallard ducks to New Zealand. In 1990, the 22 acclimatisation societies were replaced by 12 regional Fish and Game Councils (FGCs) and a national coordinating body (the NZC) under the Conservation Act 1987.
3. These FGCs are independent entities responsible for managing freshwater sports fishing and game bird hunting across mainland New Zealand⁵. They are elected bodies, with members drawn from and elected by a section of licence holders. Collectively, FGCs and the NZC are referred to as Fish and Game New Zealand (F&G).
4. To support their functions, F&G is empowered to collect fees from the public for fishing and hunting permits/licences, generating around \$13 - \$18 million annually. Additional income comes from bequests and donations. F&G does not receive any government funding.
5. The Minister's role is relatively limited to approving licence types and fees, the conditions for hunting and fishing, and sports fish and game management plans proposed by F&G. Although the Minister has some intervention powers to remove councillors under specific conditions, these powers have never been used and are quite limited when compared to modern public entities.
6. In effect, F&G operates as an "arm's length" organisation made up of separate entities that function on a "user pays, user says" basis.

Several reviews have raised issues with F&G

7. These issues are long-standing and persist today despite efforts to address them through non-legislative measures. Legislative changes are needed to address the underlying causes. The structure of F&G has remained largely unchanged since its establishment in 1990, raising concerns about its ability to adapt to current challenges and needs.
8. The reviews highlighted several problems, including:
 1. poor governance, especially in managing conflicts of interest
 2. inadequate interaction with interests outside of hunting and fishing
 3. inconsistent replication of functions across F&G
 4. a flawed electoral system leading to a lack of representation
 5. poor financial and strategic planning.

Issues go back to the formation of F&G

9. In 2001, the NZC commissioned PWC to conduct an organisational review, which was completed in 2002⁶. PWC concluded that F&G's structure was unlikely to solve its issues and that the autonomous nature of the FGCs and the regulatory settings provided no incentives for greater cooperation or to address cost duplication. While a centralised model could facilitate accountability and remove duplication, it might overlook regional priorities, stifle innovation, and become overly bureaucratic.
10. PWC also found that some provisions in the Conservation Act encouraged perverse outcomes. For example, Section 17L(4)(c) requires F&G to "maximise recreational opportunities for anglers and hunters," leading it to prioritise hunting game birds over cooperating with other community needs, such as aviation safety or preventing crop damage, in some outlier cases.

⁵ Except for the Taupō trout fishery, which is managed by DOC.

⁶ "Fish and Game New Zealand Organisational Proposals" 2002. PriceWaterhouseCoopers.

11. Between September 2018 and April 2019, the NZC commissioned audits of three FGCs, which identified governance dysfunction, conflict of interest issues, and staff and employment problems.
12. In 2020, a review of budget allocation found that resource decisions were more closely tied to licence sales than hunting/fishing activity, recommending that angler/hunter activity should be the primary basis for allocating licence fee revenue.⁷
13. In 2021, the Minister of Conservation called for a governance review of F&G. The resulting “*Review of the Governance of Fish and Game New Zealand and the Regional Fish and Game Councils*” (the Governance Review) found that the current structure and governance were not fit-for-purpose for achieving the best outcomes for hunters and anglers. The review made 36 recommendations, most requiring legislative changes to the Conservation Act and the Wildlife Act 1953 (The Wildlife Act). The NZC began implementing the non-legislative changes and developed the “Fish and Game Organisational Strategy 2023-2028.”⁸

Understanding the legislative context helps explain how F&G got to where it is

14. F&G operates under the Conservation Act, which outlines its structure and functions, including those related to angling (important provisions for game bird hunting are separated out in the Wildlife Act).
15. In 1990, an amendment to the Conservation Act established F&G, replacing the acclimatisation societies. The Conservation Act defines F&G's structure as 12 councils and one national body (the NZC), all separate public entities without specified relationship accountabilities.
16. Each FGC independently decides its actions and responsibilities within the legislative framework and its budget. Responsibilities include (but are not limited to) monitoring habitats, compliance activities, engagement, staffing, and setting corporate policies. The NZC coordinates but cannot compel FGCs to follow specific processes. The independence of these entities leads to duplication of functions and activities and sometimes inconsistencies between FGCs.
17. Licences are set nationally, but each FGC receives funds from licence sales in their region. Resident hunters and fishers purchase in or attribute their licence to their home region, but this may not necessarily be where their activity takes place (which could be in multiple national locations). The NZC then levies these funds and reallocates them to other FGCs where there are budget shortfalls. This creates wastage through double- or triple-handling of revenue before it goes to where it is needed, creates a perception that licence fees collected regionally are locally ‘owned’, and creates incentives for regions to hold onto funding at the expense of the organisation. It is very likely that the majority of licence holders do not understand how the money from their ‘choice’ of purchase region flows through the system, as licence holders perceive Fish and Game as a single body.
18. FGCs must prioritise the interests of licence holders for the benefit of hunting and fishing in the management of their functions. The legislation states that they may consider the views of non-hunting or non-angling users (such as Māori landowners, farmers, or those responsible for aviation safety), but these interests do not override the primacy of hunting and fishing interests.
19. Each FGC including the NZC, provides an annual report to the Minister, which is then tabled individually in Parliament. These reports include audited financial and performance statements, but there is no routine additional external scrutiny of F&G's operational performance, unlike other regulatory entities examined by select committees.
20. In addition to the main Acts, the Conservation Act and the Wildlife Act, other functions and responsibilities of F&G are found in various regulations.⁹

⁷ Concept Consulting 2020

⁸ Fish and Game Organisational Strategy 2023-2028 <https://www.fishandgame.org.nz/assets/About-us/Corporate-documents/2023-2028-Organisational-Strategy.pdf>

⁹ That is, the Freshwater Fisheries Regulations 1983, the Wildlife Regulations 1955, the Fish and Game Council Election Regulations 1990, and the New Zealand Game Bird Habitat Stamp Regulations 1993.

Other Acts related to Crown/public entities

21. The Public Service Act 2020 designates all FGCs as part of the State services, classifying them as Public Finance Act 1989 Schedule 4 organisations. This classification means that certain aspects of the Crown Entities Act 2004 apply to FGCs (although Fish and Game is not a Crown Entity), proportionate to their nature and role, including specific standards of reporting and accountability. Other legislation, such as the Public Audit Act 2001, also impacts F&G and is relevant when considering changes to its regulatory settings. F&G councils, as public entities, must comply with these requirements.
22. F&G's governance arrangements are also directly linked to the Local Government Official Information and Meetings Act 1987 (LGOIMA).¹⁰ This linkage aligns their decision-making processes and conduct of meetings more closely with those of local government bodies. The application of bespoke Standing Orders, discussed more below, further reinforces this alignment.

How is the status quo likely to develop without change?

23. Without legislative intervention, the current situation is likely to remain unchanged. Media reports will continue to highlight poor actions by F&G and recognised poor governance practices, with no incentive to improve policies and processes that could better serve wider conservation objectives or facilitate better management of licence fee revenue.
24. FGCs and the NZC can continue to operate under the current statutory framework. The NZC is implementing non-legislative changes recommended by the Governance Review through their organisational strategy, which aims to improve relationships and the behavioural and skills profiles of F&G. However, legislative amendments are necessary to bring F&G up to the standards of similar public entities.
25. Certain provisions in the Conservation Act, such as section 17L(4)(c), sometimes encourage perverse outcomes. This section requires FGCs to "maximise recreational opportunities for anglers and hunters," which has led F&G to prioritise hunting game birds over cooperating with other community needs, such as restricting certain birds in some areas for aviation safety or preventing damage to farmers' crops, in outlier cases.

What is the policy problem or opportunity?

26. The legislative settings for F&G do not support it in fulfilling its statutory roles and responsibilities, which affects fishing and game hunting outcomes for licence holders. This has resulted in considerable duplication of activities and functions, created conflict within the organisation and with the community, and ultimately reduced value-for-money for licence holders. It has also undermined confidence in the organisation from within FGCs and wider interest groups, such as farmers.
27. The root cause of these problems lies in the design and implementation of F&G's provisions in the Conservation Act. The legislative design likely reflects the nature of the acclimatisation societies they replaced. The current legislation does not support F&G in working as a nationally connected organisation, despite the NZC and each FGC sharing the same goals and licence fee revenue for their operations.
28. For instance, while the NZC is required to "represent nationally the interests of anglers and hunters and provide coordination of the management, enhancement, and maintenance of sports fish and game,"¹¹ the autonomous nature of all FGCs means they have no requirement (or sometimes interest) to follow any nationally set guidelines or to coordinate activities with other FGCs or the NZC.

Scope for improvement

29. There is scope for improving the overall effectiveness and efficiency of F&G, thereby enhancing value-for-money. Opportunities exist to build on the strength of F&G's model of local ownership, leveraging

¹⁰ LGOIMA, Part 7, through being a type of local authority listed in Schedule 2

¹¹ Section 26(B)(1), Conservation Act

the skills and knowledge of resources to manage them effectively to suit local conditions and licence holder needs.

30. The issues can be loosely divided into two categories: *Functions* and *Governance*. These reforms have been informed by the findings of previous reviews but are broader in scope to include both the functions of F&G and its governance arrangements.

Functions – Inefficiencies

31. Localised exercise of some functions results in unnecessary duplication across F&G. While some FGCs coordinate, such as sharing equipment or staff, there is no common national perspective. FGCs may use different providers for services like accounting, missing out on savings from economies of scale.
32. The NZC lacks the power to enforce adherence to national policies, such as those for health and safety, monitoring, compliance, advocacy activities, or ensuring engagement with Treaty partners. Each FGC can establish its own policies, creating added burdens particularly on smaller FGCs.
33. Collecting a national licence fee locally means the budget does not naturally flow to areas of highest need or greatest licence holder activity. Corrective mechanisms create inefficiencies and do not fully address this problem. The existing mechanism also creates incentives to under-forecast licence sales to retain funding, causing tensions between FGCs.
34. Ineffective approaches to managing conflicting interests or priorities across F&G and with other resource users create inconsistencies that affect the licence holder experience. Actions of one FGC can set precedents or impact the image or direction of F&G as a whole.

Governance – Legislative shortcomings

35. F&G is not a fit-for-purpose modern-day organisation. Its settings enable inefficiency, poor governance and management, conflict, and concerns over the soundness of individual FGCs and F&G as a whole.

Governance issues include:

- i. A disproportionate number of councillors (up to 144) for the decisions required of a small organisation.
- ii. Unclear relationships and accountabilities between elected representatives and staff, and between the NZC and FGCs.
- iii. A lack of good governance practices leading to mistrust and lack of transparency between the NZC and individual FGCs.
- iv. An outdated election process that limits representation and decision-making to annual licence holders, excluding certain groups and undermining the democratic basis of the organisation.

Objectives

36. To address the functions and governance issues, the proposed changes need to maximise the benefits of local decision-making and knowledge to support local conditions, remove administrative burdens, and create efficiencies nationally. This will help licence holders see value-for-money and enjoy a better hunting and fishing experience.

Targeted engagement for consultation

37. Due to extensive prior consultation on issues with F&G and possible solutions from previous reviews, including the 2021 Governance Review, the Minister preferred a targeted engagement approach for these reforms.
38. In November 2024, Minister McClay sent letters to all FGCs to gather their views, inviting responses by 16 December 2024. All FGCs responded by the deadline. The letters included open or prompting questions about the current F&G model but did not seek input on specific policy proposals or cover all aspects of the policy framework. The Minister encouraged FGCs to consider and reflect the views of their licence holders, Māori interests, and other interested parties.
39. The Minister also wrote to post-settlement governance entities (PSGEs) with statutory relationships or arrangements with F&G in their settlements or deeds. DOC reached out to other iwi and hapū through

existing relationship channels in January and February 2025, inviting responses by the end of February 2025.

40. Additionally, Minister McClay met with the NZC in December 2024 to hear the national perspective, and Minister Meager met with all FGCs in February and March 2025 to hear local views. The Ministers chose not to engage more widely on specific policy issues, so the direct views of licence holders, the wider F&G community, and other users of shared resources (e.g., farmers) were not canvassed. However, views of these groups and individuals consulted through previous reviews, or expressed independently in correspondence with the Minister, or through the media, have informed policy development.

Points of agreement and points of contention

41. FGCs broadly agree on the problems within F&G and support the need for change. However, increasing decision-making authority for the NZC is likely to be a significant point of contention.
42. Most FGCs support becoming a more cohesive organisation to improve efficiency and effectiveness. However, opinions on how to achieve this vary between FGCs. It was also noted from discussions the Minister had with every FGC that opinions can also vary within each council. Some FGCs advocate for low-to-mid-sized adjustments to the existing model, while others support broader changes. For example, one FGC believes the NZC should manage most functions, including staffing, whereas others argue for more FGC autonomy to implement change, with the NZC only supporting FGCs in need of additional help.
43. Most FGCs agree that the NZC could do more to standardise corporate requirements, alleviating burdens on local FGCs, especially smaller ones. However, some FGCs including 9(2)(g)(i) [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

General support for governance improvements

44. FGCs generally support proposals to improve eligibility to vote (opt-out enrolment) and stand for election (beyond just whole season licence holders). They also agree that reducing the number of councillors on each FGC could enhance decision-making while maintaining a diversity of views.
45. However, opinions on a requirement to have a fit and proper person test and criteria for removing councillors are mixed. Some FGCs believe a fit and proper person test would create additional hurdles, potentially reducing the number of candidates standing for election or adding unnecessary bureaucracy. Others think the current legislation is sufficient for removing councillors and that FGCs should exhaust all internal avenues before involving the Minister in the removal process.

Neutral or little support for merging regions or receiving an honorarium

46. Some FGCs supported merging regions if evidence showed it would improve efficiencies. However, most FGCs opposed merging themselves and preferred other methods to create efficiencies and improve effectiveness. Five FGCs suggested redefining FGC boundaries to manage physical resources more efficiently.
47. Eleven of the thirteen FGCs did not support an honorarium for regional FGCs or overall. There was some support for an honorarium if it would attract younger candidates or compensate for the increasing workload of the NZC.

The biggest source of tension between the NZC and FGCs is communications and funding

48. There is general agreement that the current funding model is inefficient, outdated, and does not fully support the needs of angler and hunter activities. However, some FGCs perceive that the NZC is taking money away from them, reducing their ability to serve their licence holders. Centralising the funding model is likely to cause concern among FGCs that hold this view.
49. Some FGCs such as those in 9(2)(g)(i) [REDACTED] However, there are overall suggestions that the relationship

between the NZC and FGCs needs improvement. One way many FGCs felt could achieve this is for the NZC to increase transparency in its decision-making and spending.

Most see a regional link to the NZC and certainty of position as important

50. Generally, most FGCs saw a need to maintain the regional link to the NZC and are less supportive of Ministerial appointments, particularly if not from the pool of licence holders.
51. Most FGCs saw a need to create certainty of position on the NZC, with some suggesting that a NZC representative only be removed by their FGC, by Ministerial approval or resignation.

Iwi responses covered more than just F&G

52. In December 2024, the previous Minister, Minister McClay, contacted 20 PSGEs who have a statutory relationship or arrangement with F&G in their settlements or deeds. DOC also reached out to other iwi and hapū in January and February 2025, inviting responses by the end of February 2025. The Minister received one written response from Ngāi Tahu and three verbal responses via DOC.

Key feedback from iwi

[REDACTED]

Section 2: Assessing options to address the policy problem

What criteria will be used to compare options to the status quo?

57. We have used the assessment criteria set out in Annex 1 to assess the suitability of each option.

What scope will options be considered within?

58. The scope of DOC's policy analysis is:
- i. To retain the basic "user pays, user says" approach that is institutional to F&G.
 - ii. To retain current F&G functions generally, rather than remove any entirely/reallocate responsibility to other entities within the wider conservation system.
 - iii. To retain the broad existing structure of F&G with both local and national bodies.
 - iv. To examine the balance of functions and governance between the NZC and FGCs, as well as the overall F&G model.
 - v. To exclude the Taupō Trout District and the New Zealand Game Bird Habitat Trust.

What options are being considered?

59. The proposals for change are focussed on the amendments needed to modernise F&G. They are loosely divided between functions and governance, but the links between them are critical.

¹² For Ngāi Tahu, mahinga kai is about ensuring that people can continue to gather kai in the way their ancestors did, and about mana and manaakitanga (hospitality).

¹³ Another DOC policy area unrelated to F&G reforms.

Reforms should be considered as a package

60. While the recommendations below separate decisions into sections, the proposals should be considered as a single package of change with optionality in some areas. This approach acknowledges the interconnected nature of the reform.
61. Changes follow the principle that 'form follows function'. DOC began by considering where roles and responsibilities should sit within the organisation based on the Minister's steer to maintain clear links between the NZC and FGCs. This, in parallel, led to developing proposals to ensure the best decision makers were in place to take on these roles and responsibilities through changes to membership of the NZC, improvements to voting systems, and changes to improve standards of reporting and behaviour across the councils.
62. This approach ruled out certain options as their inclusion would not have worked within this broad framework. For instance, giving the Minister general power to appoint FGCs and/or the NZC would not have been consistent with the approach to maintain a user-pays, user-says approach. Shifting all functional responsibility to the NZC, even when maintaining local offices to manage work and canvass local expertise to inform decisions, would undermine the rationale to elect decision making FGCs.

Functions

63. The analysis of the functions is designed to:
 - i. rebalance what the NZC and FGCs do
 - ii. adjust the roles and responsibilities between the NZC and FGCs
 - iii. reorganise how the licence fees are collected and managed
 - iv. require FGCs to take account of other resource users' interests.

Proposal 1: Rebalance the functions and responsibilities between the NZC and FGCs

64. This proposal rebalances the functions and responsibilities of F&G to reduce duplication and improve cohesion across the organisation. Having a clearer NZC role for setting key corporate functions and strategic direction on a number of areas should provide for a more unified F&G approach to activities like monitoring, compliance, advocacy, planning, and reporting. This consolidation of responsibilities under the NZC will lead to more efficient decision-making processes, clearer accountability, and enhanced strategic alignment across all functions, ultimately fostering a more effective and responsive organisational framework.
65. This approach will free FGCs to focus on key regional activities for the benefit of their licence holders, rather than focusing time on basic corporate functions. The suggested frameworks allow significant scope for FGCs to plan work programmes that address issues important to their region.
66. The siloed nature of F&G was likely built into the design of the legislation due to the influence of the acclimatisation societies that preceded F&G. This legislative framework limits F&G's ability to work cohesively and effectively as a unified organisation. Consequently, there are no consistent or collectively managed functions, leading to duplication and confusion about responsibilities, despite each FGC sharing the same goals and licence fee revenue for their operations.
67. Licence fee collection and budget allocation is also a key function, but a significant topic in its own right. It has therefore been separated out in Proposal 2, but note that analysis of the best options for rebalancing functions is also linked to proposals for budget.

Four options were considered:

1. Option 1. Status quo. No widespread coordination or shared functions between FGCs and the NZC (e.g. 12 regional councils and 1 national council with 13 potentially different health and safety policies), lack of coordination of activities such as monitoring, compliance, advocacy, planning, and reporting, and high levels of product and resource duplication. This adds unnecessary costs across F&G paid for by licence holders, with difficulty establishing a common, comparable, national understanding of F&G responsibilities e.g. population trends.

2. Option 2. Targeted changes – the NZC sets frameworks for action. FGC’s decision-making largely retained (including for budget – see proposal 2 below) but must be within frameworks set by the NZC.
3. Option 3 (preferred). FGCs and the NZC rebalance functions
 - i. the NZC takes responsibility for setting binding policies in consultation with FGCs for key corporate functions (e.g. Health and Safety; HR); And
 - ii. NZC sets strategic direction, with binding policies and templates (either minimum requirements; OR within parameters) in consultation with FGCs, for monitoring, compliance, advocacy, planning, and reporting. FGCs have flexibility to tailor action to local conditions within these frameworks
 - iii. FGCs continue to have responsibility for decision making on key local hunting and angling conditions.
4. Option 4. The NZC is solely responsible for achieving regulatory responsibilities. This option was out of scope of the reforms as it does not:
 - i. retain the broad existing structure of F&G with both local and national bodies
 - ii. balance functions and governance between the NZC and FGCs.

How do the options compare?

68. The comparison of each of the options is set out in Annex 1.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

69. Analysis of Option 2 was limited by an early direction from the Minister for his preferred option, Option 3. However, initial analysis of Option 2 did find that although there are distinct benefits to a more NZC-directed approach through the NZC setting frameworks that FGCs must follow (namely, benefits that will come from seeing high consistency across F&G). However, DOC analysis suggested Option 2 did not go far enough to improve outcomes for licence holders as most of the current issues associated with regional autonomy would remain.
70. For example, under Option 2, licence fees would continue to be collected regionally by FGCs. This has major budget implications for F&G that ultimately impact value-for-money and hunting and fishing experiences for licence holders. As powers for delivering functions is unevenly matched (e.g. budget and functions decisions separated), DOC believes that Option 2 is less likely to foster stronger working relationships between FGCs and the NZC, which is one of the Minister’s key priorities.
71. Option 3 is preferred because it splits decision-making between the NZC and FGCs, encouraging consultation and adoption of best practice to:
 - i. reduce overall costs and administrative burdens on FGCs by centralising nationally agreed strategic planning, corporate policies and procedures (e.g., HR and health and safety), and coordination of activities such as monitoring, compliance, advocacy, planning, and reporting, enhancing efficiency and effectiveness
 - ii. better facilitate the use of local knowledge and regional flexibility
 - iii. improve regulatory performance
 - iv. contribute to clearer and more effective transparency, governance and accountability.
72. Annual reporting will change so that instead of each FGC independently providing its own separate annual report to the Minister for lodgement in the House, the NZC will compile the FGC annual reports, along with its own annual report, into one single annual report for the Minister.
73. The following table shows the rebalance of functions for Option 3 in more detail. It follows the principle of local decision-making for local conditions and issues, and national decision-making for corporate issues and policy settings. Note that some content in this table is covered by other proposals, such as the distribution of licence fee money, which is covered by Proposal 2.

The NZC	FGCs
---------	------

Decision-making (in consultation with FGCs) over: <ul style="list-style-type: none"> • Distribution of licence fee dollars across Fish and Game supported by principles for allocation and strategic plan. • Binding national policies for: monitoring (minimum requirements), compliance (minimum requirements), advocacy (parameters), and corporate functions (including job descriptions/salaries, uniforms, health and safety, human resources) • Mandatory forms and templates for sports fish and game management plans (SFGMPs), annual operational work plans, and annual reporting. 	Decision-making over: <ul style="list-style-type: none"> • Regional/local species and habitat management (e.g. tailored monitoring relevant to local needs). • Compliance activities (e.g. tailored to specific local hotspots) • Local advocacy (within strategic framework set by NZC). • Regional/local hunting and fishing conditions (i.e. Angler and Game Notices). • Content of SFGMPs, annual operational work plans, and annual reports (subject to any relevant binding policies or forms/templates and within allocation budget).
Responsibility for: <ul style="list-style-type: none"> • Issuing of licences and collection and allocation of licence fees (includes supporting technology and managing sales agents). • Reviewing the performance of individual FGCs and Fish and Game as a whole (tied into annual reporting process). • Compiling annual reports into one combined Fish and Game annual report. • Collating and editing (form and readability) of Angler and Game Notices and may amend for useability and consistency. • Employing its Chief Executive (who will employ national staff and specialist/expert staff that can work across the organisation as needed (who can be based in regions). • Directing FGCs' appearances before courts or tribunals and intervening in local advocacy actions when such actions are contrary to the agreed-upon binding advocacy policy. 	Responsibility for: <ul style="list-style-type: none"> • Input into development of binding national policies and mandatory forms and templates. • Producing SFGMPs and annual operational work plans (subject to relevant policies and forms/templates). • Providing individual annual report and statement of performance to NZC for the purpose of combined annual report and audit. • Employing their respective Chief Executives who is accountable to the FGC and who will employ regional staff), within corporate/HR policy set by NZC. Can request specialist staff from NZC. • Representation in the courts, subject to the direction of the NZC (for both compliance and advocacy).

Consultation/engagement themes

74. Responses to the recent letters sent by the Minister to FGCs showed that many FGCs are likely to be broadly supportive of the overall direction of Option 3. Most FGCs are likely to support greater centralisation of corporate policies for improving efficiency and removing administrative burdens, with in-principle support likely for setting binding policies for other functions provided FGCs are heavily involved in designing these policies.
75. Some FGCs are likely to be concerned about moving key functions to the NZC, perceiving an increase in bureaucracy and loss of autonomy. This relates to their opinion that their FGCs are functioning efficiently within the current model, and the NZC should focus efforts on supporting those that need it, rather than providing a more unified approach.

Costs and benefits

Costs	Benefits
<ul style="list-style-type: none"> • 9(2)(g)(i) 	<ul style="list-style-type: none"> • Value-for-money and a better experience for licence holders: Reduced administrative burdens on FGCs allow

<p>9(2)(g)(i)</p> <ul style="list-style-type: none"> Implementation challenges: Transitioning to a new structure may involve initial implementation challenges including costs and require adjustments Increase in bureaucracy for the NZC: An increased role for the NZC will necessitate an increase in its bureaucracy; at the same time, individual FGCs will need to do less administration for some functions. 	<p>more focus on decisions and value-for-money for issues directly benefiting anglers and hunters.</p> <ul style="list-style-type: none"> Cost reduction: Centralising strategic planning, corporate policies, and coordination of activities (e.g. monitoring, compliance, advocacy) will reduce costs and enhance efficiency. Improved governance: Clearer roles and more effective governance and accountability through decision-making on administrative and back-office functions. Regulatory performance: Enhanced regulatory performance by having the NZC oversee key functions and set consistency in approach. Local knowledge: Retains regional flexibility and the use of local knowledge in decision-making. Streamlined reporting: Annual reporting will be complied into a single report by the NZC, simplifying the process and improving transparency.
--	---

Proposal 2: Centralised licence fee and budget allocation

76. This proposal will increase efficiency in the collection of licence fees and set clear principles for the effective allocation of operational budgets that are easy for users (licence holders) to understand, fair and transparent for FGCs. This proposal also covers the direction for the use of accumulated funds (e.g., financial reserves).
77. Under this proposal the NZC will have a greater role in collecting and distributing revenue, acknowledging the increased decision-making role the NZC will have through the reforms. Distribution will be managed through a transparent process with the input of FGCs to provide clarity and operational certainty.
78. This proposal will reduce double and triple handling of licence fee revenue, clarify what budget each FGC will receive each year in line with activity and statutory obligations, and maintain a contingency fund for use in addressing strategic objectives.

Fees collection and budget allocation is inefficient and outdated in the current system

79. Licence fees are currently collected on behalf of the Minister for use by F&G to fulfil its obligations under the Conservation Act for the benefit of hunters and anglers. Licence fees are collected either through an online portal, with the licence issued electronically, by visiting a regional Fish and Game office or an agent (or by phone in the case of a hunting licence).
80. Funding is retained by the region the licence seeker indicates they 'want to support' when purchasing their licence (or the region where the agent is located if purchased in-store). This means that even though a licence holder may purchase a licence that can be used in any region, they are financially supporting one region only. The region on the licence may also not represent the region where the user does the majority of their hunting and/or fishing.
81. This revenue is then levied by the NZC to both fund NZC activities and provide grants to regions with lower licence fee revenue, resulting in money being double or triple handled before it reaches where it is needed. This creates significant inefficiencies and wastes time and effort.
82. This system also creates poor incentives for manipulation by FGCs to retain funding they may not need. Levy amounts are decided based on predicted licence sales and not actual figures. FGCs are therefore incentivised to underestimate their total licence sales to reduce the total levy they must pay, allowing them to keep revenue from actual licence sales over this estimate.
83. This system results in funding following location of licence sales and not of hunter/angler activity, with some regions receiving more than they need to address the impact of usage, and others receiving not enough. Independent advice commissioned by Fish and Game notes that activity has been trending southward for many years, but revenue is not following. While the levy system is supposed to

compensate for this, it does not do this effectively. It is evident that many users do not understand how their initial declaration has such an impact on where their fee goes.

84. This system is overly complex and wasteful, with funding often not reaching regions where it is needed, double and triple handling, and clear avenues for abuse. The proposed solution will see all licence fee revenue collected by the NZC for redistribution to FGCs based on a national funding strategy that will be developed by the NZC and FGCs.

The details of a specific F&G funding model are best worked out in secondary legislation

85. DOC recommend that the details of the funding model be developed in consultation with F&G following Cabinet decisions on proceeding with legislation. The details of the funding model will be given effect through secondary legislation. This approach allows greater flexibility for the funding model to be changed in the future should circumstances change. Therefore, our intention at this stage is to only include an enabling provision in the primary legislation.
86. While the details of the funding model will be discussed with F&G, we propose a high-level model which prioritises funding for the following areas:
- i. Funding for FGCs to cover the cost of core activities as set in binding policy.
 - ii. Funding for the NZC to cover the cost of its core activities
 - iii. Funding for FGCs allocated in line with hunting and fishing activity (with numbers coming from hunter/fisher surveys and not licence sales).
 - iv. Remaining funding retained as a contestable fund to be used to address key strategic objectives.
87. This model should ensure that money flows to the areas with the greatest need based on activity and the cost associated with carrying out core functions. The new split of functions (Proposal 1) will mean FGCs will no longer have to perform certain tasks and will be free to focus on local issues. While the total amount of money to each FGC may either go up or down compared to the status quo in this model, no FGC should feel as if they have lost out.
88. In principle, the funding model is likely to be supported by most FGCs as it will guarantee their funding for core activities while leaving sufficient space for funding to be used to address local issues. It is important that proposals make clear that the financial strategy will be developed by the NZC in consultation with FGCs to avoid perception that the NZC has carte blanche authority to make decisions. The way the NZC is formed is also of particular relevance to budget decisions (see proposal 4).

Two options were considered:

1. Option 1. Status quo. Regional licences with fees collected going to a selected region chosen by the licence holder. This is not necessarily the region in which they hunt or fish (funds do not necessarily follow activities). A levy system is maintained to rebalance funds across the organisation. There is inefficiency from the double and triple handing of fees. Regional and uncoordinated financial strategies continue, with differing regional priorities leading to potential disagreement on approaches to issues between some neighbouring FGCs.
2. Option 2 (preferred). The NZC issues licences and collects fees centrally. In consultation with FGCs, the NZC develops a financial strategy to set the direction for the purpose of and use of accumulated funds as a collective organisation. A F&G funding model broadly sets out how funding is then allocated. This should increase certainty of funding decisions, transparency and trust across F&G, leading to adequate funding to support hunting and fishing needs.

How do the options compare?

89. The comparison of each of the options is set out in Annex 1.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

90. Option 2 is the preferred option because it would:

- i. provide cost savings by centralising administration of licence issue and the collection of fees
- ii. link decisions on budget with decisions on core functions and strategic organisational goals led by the NZC but in consultation with FGCs
- iii. remove perverse incentives by ensuring key items and functions necessary for the running of FGCs and the NZC are adequately funded based on parameters agreed with FGCs
- iv. Ensure certainty of funding, transparency, and build trust between the NZC and FGCs.
- v. Provide better outcomes for licence holders: money can better follow where activity is trending, and support the development of new opportunities nationwide

Consultation/engagement themes

91. Generally, most FGCs see a need to change the funding model, with some variation on ideas/models. The biggest source of tension between the NZC and FGCs appears to be the perception that the NZC is taking money away from regions and that NZC does more than what it is statutorily required to do. There was some specific support for fully centralising the licence fee function. Many support the need for greater activity based budgets, but this might not include centralisation of funding distribution.

Costs and benefits

Costs	Benefits
<ul style="list-style-type: none"> Resistance from some FGCs: Some FGCs may resist changes due to concerns about loss of regional autonomy and centralisation. Implementation challenges: Transitioning to a centralised system may involve initial implementation challenges and require adjustments. Perception issues: There may be a perception that the NZC is taking money away from regions, leading to potential dissatisfaction among FGCs. 	<ul style="list-style-type: none"> Cost savings: Centralising the issuing of licences and collection of fees will provide cost savings. Efficient fund allocation: Funds will be allocated based on hunter/angler activity, ensuring resources are directed to areas with the highest need and improving hunters and anglers' experiences. Improved governance: FGC Chairs, as members of the NZC, will allocate funds more appropriately, better balancing regional needs with national interests. Elimination of inefficiencies: Centralised collection and allocation will reduce inefficiencies caused by the current system of regional licences and levies. Increased trust: A transparent model that ensures certainty of funding for FGCs will help to build trust between the NZC and FGCs over time.

Proposal 3: Mandate the requirement for FGCs to take account of non-F&G interests

92. Currently, Fish and Game Councils have a function to manage sports fish and game birds for the benefit of licence holders. In developing SFGMPs, they must 'have regard to' the impact of their management of other resources and other users of the habitat. Other users include, but are not limited to, farmers and those involved in aviation controls against bird strikes, and other resources includes threatened indigenous species.
93. This proposal will require them to have regard to such resources and users more widely, in general decision making. This will improve F&G's reputation with other users of shared resources and promote a proactive approach to the concerns or issues of non-hunting and non-fishing groups.
94. This proposal also introduces a specific list of interests in legislation that take precedence over F&G, which ensures:
- i. aviation safety is not compromised
 - ii. the conservation of isolated populations of threatened native fish is not impeded
 - iii. general regard is given to the impact of management on other natural resources and other users of the habitat.

95. As a complimentary measure, this proposal requires SFGMPs to include details on how conflicts between the needs of non-hunting/fishing interests and management for the benefit of licence holders will be handled.

The options considered were:

1. Option 1. Status quo. FGCs have regard to non-hunting interests in SFGMPs only.
2. Option 2 (preferred). F&G must:
 - i. Have regard to non-hunting and fishing interests more generally (not just in SFGMPs)
 - ii. describe how conflicts with non-hunting and fishing interests will be managed
 - iii. account for a specific list of interests in legislation that take precedence over F&G's needs due to their significance or because of people's health and safety (e.g., aviation safety if there is a likelihood of bird strikes in an area)
 - iv. give authority to FGCs to act as required with respect to game birds causing damage or risk without needing to gain permission from DOC.

How do the options compare?

96. The comparison of each of the options is set out in Annex 1.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

97. Option 2 is the preferred option because it would:
- i. require FGCs to take account of the interests of other resource users generally, particularly where public safety is involved or where there could be a high environmental, economic or social impact
 - ii. require FGCs to act where there is risk to safety or property (aviation safety, crops, etc.).

Costs and benefits

Costs	Benefits
<ul style="list-style-type: none">• Implementation challenges: FGCs may face challenges in integrating non-hunting and fishing interests into their SFGMPs and ensuring compliance with new requirements.• Potential resistance: Some FGCs may resist changes due to perceived additional burdens or shifts in priorities.• Resource allocation: Additional resources may be needed to develop and implement comprehensive management plans that account for non-hunting and fishing interests.	<ul style="list-style-type: none">• Enhanced safety and environmental protection: Ensures that FGCs consider the impact of their actions on public safety (e.g. aviation bird strikes) and on highly threatened fish populations, leading to better environmental and safety outcomes.• Improved stakeholder relations: By considering non-hunting and fishing interests such as farmers and others, FGCs can foster better relationships with other resource users. Goodwill garnered here should filter down to in-person interactions between, e.g., farmers and hunters/anglers at shared resources.• Conflict resolution: Requires detailed plans for handling conflicts between hunting/fishing interests and the interests of other resource users, promoting more balanced and sustainable management practices.

Governance

98. The analysis of the governance of F&G is designed to:

- i. re-examine the membership of the NZC to support rebalanced functions and decision making
- ii. adjust Ministerial powers to improve checks and balances and transparency
- iii. improve professional standards within F&G, aligning it with modern entity standards
- iv. upgrade F&G's decision-making efficiency and improve a user pays-user says model

- v. reduce the number of councillors to support good decision making by FGCs.

Proposal 4: Membership of the NZC

- 99. Under a new arrangement of functions, in particular where responsibility for budget and establishing binding policies is set by the NZC, the make-up of the NZC is critical to supporting good decision making, fostering good relationships and communication between the NZC and FGCs, and improving transparency.
- 100. This proposal also seeks more consistent membership of the NZC that is representative of each FGC, promoting collaborative work at the national level. Previous reviews have noted that current legislation allows FGCs to recall their representative from the NZC by majority vote and appoint another person at any time. This has led to disruption and inefficient decision-making, as some NZC members focus on regional interests to reduce the 'risk of recall', rather than considering the national perspective.
- 101. The Minister had indicated that the option to elect the NZC separately from FGCs (a proposal recommended in other reviews) would not be acceptable. It was considered that this approach would not support the necessary relationship or decisions needed between FGCs and the NZC.
- 102. Decoupling the link between FGCs and the NZC may be an effective measure in the current model to manage concerns that national decisions are being overly influenced by regional interests. However, in a new proposed model where the NZC has a greater role for directing policies on key functions and making budget decisions, maintaining a tangible link to FGCs is considered critical.

Three options were then considered:

- 1. Option 1. Status quo. FGCs can nominate any member of their FGC to the NZC, and maintain the right to recall them at any time.
- 2. Option 2 (preferred). NZC is made up of the Chairs of FGCs.
 - i. The Chair of the NZC is appointed by members of the NZC (i.e., the Chairs of FGCs appoint the Chair of the NZC).
 - ii. The explicit provision providing the right to recall appointed members at any time is revoked, but maintain the right for FGCs to change their Chair (and hence representative to the NZC). For improved transparency, if a Chair (and representative to the NZC) is changed, the FGC's rationale must be set out in writing to the NZC.
- 3. Option 3. The Minister appoints all members of the NZC (these appointees may be independent of F&G and not necessarily F&G councillors).

How do the options compare?

- 103. The comparison of each of the options is set out in Annex 1.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

- 104. Option 2 is the preferred option. It combines a consistent membership of the NZC that is knowledgeable and representative of each FGC issues, and encourages FGCs to work collaboratively at the national level. FGCs would need to have clear influence on and representation at the NZC to support decision-making that would directly affect their operation, including on budget matters. The FGCs' Chairs are likely to be in the best position to facilitate this and ensure good communications and linked decision-making with their respective FGC.
- 105. While it is proposed to remove the provision in the Conservation Act that allows FGCs to recall their representatives on the NZC, it remains important that FGCs have the ability to change their Chairs to support their interests at both the local and national levels.
- 106. Option 3 goes too far and would fundamentally change the model of F&G, bringing the NZC much closer to Government. This would considerably reduce its "arms-length" independence and goes against the "user pays, user says" objective of the reforms. It would also further reduce the link

between FGCs and the NZC, which is likely to lead to a culture of mistrust and poorer outcomes for FGCs.

Consultation/engagement themes

107. There was little support for appointments to the NZC, especially if the appointees were not licence holders. Most FGCs see the regional link to the NZC as important, and there are a range of views on how the NZC could be formed:

- [REDACTED]

■ [REDACTED]
- iii. Most FGCs see a need to create certainty of position on the NZC, with some suggesting removal only by the Minister or through resignation.
- iv. Note that the increasing demands of the NZC role are deterring some councillors from agreeing to be their regional representative on the NZC.

Costs and benefits

Costs	Benefits
<ul style="list-style-type: none"> Resistance to change: Some FGCs may resist changes due to concerns about losing flexibility in appointing representatives to the NZC. Increased workload: The increased demand on NZC members, particularly Chairs of FGCs, may deter some councillors from taking on these roles (this could be offset by compensating NZC members in recognition of their expanded role). Potential for regional bias: There may still be a risk of regional bias if Chairs prioritise their own regions over national interests. 	<ul style="list-style-type: none"> Consistent representation: Ensures consistent representation of FGCs on the NZC, promoting a unified approach to decision making. Balanced decision making: Encourages FGCs to work together and more closely with the NZC, balancing regional and national interests. Enhanced governance: Provides a stable and predictable governance structure, reducing inefficiencies and promoting better coordination. Regional link: Maintains a strong regional link to the NZC, which is important for addressing local issues and ensuring regional perspectives are considered.

Proposal 5: Checks and balances and transparency (Groups 1 and 2)

Group 1: Adjustment of Ministerial powers (power to appoint, remove, review Fish and Game, approve notices, and prevent the transfer of sports fish to a location where they already exist to meet Treaty needs)

108. These changes have been grouped together like this because they all relate to Ministerial powers aimed at improving checks and balances and transparency, and also provide for efficiencies. There are some inconsistencies in how Ministerial powers operate for F&G compared with similar situations in other legislation. There are also inconsistencies in how Ministerial powers operate across fish and game bird decisions. This proposal will remove those inconsistencies, bringing F&G closer in line with modern public entities and simplifying processes.

General discretion for the Minister to appoint up to two people to a FGC or the NZC

109. Elected members of both FGCs and the NZC may sometimes lack the full range of skills required for good decision making, particularly when a council is faced with a challenging set of circumstances (e.g. externally driven events needing particular knowledge; difficult internal conflicts to manage; lack of suitable election candidates). This proposal gives the Minister the discretion to make appointments to both FGCs and the NZC to enhance decision making in those rare cases. Such appointees would be

paid in accordance with the Cabinet Fees Framework and funded by Fish and Game licence fees. This power is intended as a 'backstop measure' should other mechanisms in the model (e.g., co-opting, improved codes of conduct, etc.) not deliver improved outcomes. As such, DOC does not consider this would have significant financial consequences.

110. Any Ministerial appointment increases the perceived or real risks to the Minister for the actions and decisions then taken by the relevant FGC. The decision to use a discretionary power would also be subject to judicial review.
111. Such appointed members will be entitled to vote on any matter but cannot be elected as the FGC Chair. They are appointed because a skillset is missing from the FGC, as determined by the Minister.
112. DOC suggested that legislation specify the circumstances under which the Minister could make such appointments. Those would be to enhance:
 - i. public sector governance
 - ii. financial management
 - iii. te ao Māori capabilities
 - iv. technical, ecological, or scientific skills
 - v. any other skill that would enhance the decision making of a FGC.
113. The Minister disagreed with this approach and has requested the ability to appoint for any reason. It is likely this change will make only a minor difference to how appointments will work in practice (given the scope of reasons listed above cover all likely reasons for appointments), but may increase risks that the Government will bear greater responsibility for the actions of appointees not limited to specified areas.
114. The risk of this happening is very low, especially considering that Ministerial appointments would be made very rarely. DOC therefore considers the adjustment of this option to broaden it justified.

Expanding the ability for the Minister to remove a member of a FGC

115. The Minister currently has the power to remove an FGC member for limited grounds:
 - i. bankruptcy
 - ii. inability to perform the functions of the office
 - iii. neglect of duty
 - iv. misconduct
 - v. a conviction for an offence involving sports fish, game, or protected wildlife.
116. Ministerial removal of a FGC member carries a high risk of judicial review if the principles of natural justice are not observed. In past cases, it has been challenging to gather evidence of poor governance or behaviour, specific to the reasons listed above, making it difficult to establish a case.
117. Given these challenges, it is recommended to broaden the scope of the power of removal to ensure it is not unduly restrictive while still upholding natural justice principles. This expansion aligns with comparable provisions in other legislation, such as the Crown Entities Act 2004 (Crown Entities Act). Comparable bodies under the Crown Entities Act have removal provisions based on "just cause", which will apply to F&G.
118. Under this proposal, any member of a FGC may, at any time, be removed from office by the Minister for any "just cause", including misconduct, inability to perform the functions of office, neglect of duty, and breach of any collective duties of the FGC or the NZC, or the individual duties of FGC or NZC members (depending on the seriousness of the breach).
119. A person terminated for "just cause" is generally not entitled to notice, severance, or unemployment benefits.

Power to review Fish and Game

120. The Minister lacks the authority to review the operations or performance of the NZC, individual FGCs, or Fish & Game as a whole. This proposal will grant the Minister this explicit power. While the proposed framework aims to enhance the performance of FGCs and the NZC, it is still recommended the responsible Minister has an explicit power of review. This power would serve as a backstop and provide an evidential basis for other necessary interventions, such as the removal of a councillor. This proposal aligns with other recommendations to strengthen accountability.

Power to approve Angling and Game Bird notices

121. Under the current Conservation Act, the Minister cannot amend an Anglers Notice before approving it, which has previously resulted in delays to the start of the sports fishing licence sales. This proposal would allow the Minister to amend an Anglers Notice before approving it, similar to the current process for Game Notices under the Wildlife Act.
122. Additionally, a past drafting error means approved Game Notices can, in practice, only be amended from May to the following February. This proposal would allow approved Game Notices to be amended at any time of the year, providing for greater flexibilities for FGCs to propose altered hunting conditions.

Power to prevent the transfer of sports fish to a location where they already exist to address Treaty needs

123. FGCs can transfer sports fish to locations where that species already exists. The Minister of Fisheries may prohibit such a transfer (for the purposes of the Fisheries Act 1996), but the Minister of Conservation and Minister for Hunting and Fishing currently lack this power.
124. Treaty partners have in the past expressed concerns and a desire for the periodic transfer of sports fish by FGCs to isolated fisheries to cease, to meet cultural objectives.
125. This proposal provides the Minister with the power to prohibit transfers where necessary, which should help Ministers address future Treaty needs.

Two options were considered for Group 1:

1. Option 1. Status quo. Ministerial powers are inconsistent when compared to other legislation, with limited powers to make appointments and removals. The Minister cannot amend an Anglers Notice before approving it. Game Notices can only be amended within specific dates. Treaty partners' needs can be bypassed.
2. Option 2 (preferred). Adjust the powers of the Minister to bring them in line with similar public entities. Update legislation to reflect the rebalance of powers and responsibilities in the proposed framework; align Ministerial powers regarding making appointments, "just cause" removal of members, reviewing notices, reviewing performance of FGCs, NZC and F&G, preventing the transfer of sports fish to locations where they already exist, and to correct a drafting error to allow Game Notices to be amended at any time of the year.

How do the options compare?

126. The comparison of each of the options is set out in Annex 1.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

127. Option 2 is the preferred option. This will reflect the rebalancing of the NZC and FGCs responsibilities and functions and bring the Minister's powers in line with similar public entities and more consistently applied across their own legislation. This provides greater flexibility for the Minister to respond to the needs of FGCs and, if needed as a backstop, manage issues that arise within the organisation. Improved 'backstop' measures acts as a disincentive for poor behaviours in the first instance. Backstop measures would work in tandem with other proposed measures to improve governance outlined in Group 2 below.

Consultation/engagement themes

128. Feedback was only provided on the proposal to update legislation relating to the removal of councillors, indicating that many felt that it is currently too difficult to do so when required. Some considered the current requirements are already adequate.

Costs and benefits

Costs	Benefits
-------	----------

<ul style="list-style-type: none"> • Implementation challenges: Adjusting Ministerial powers may involve initial implementation challenges and require adjustments. • Potential resistance: Some FGCs may resist changes due to concerns about increased Ministerial oversight and intervention. 	<ul style="list-style-type: none"> • Avoiding disruptions for licence holders: The ability to amend Anglers and Game Notices more efficiently can prevent delays in licence sales, and provide greater flexibility for FGCs to updated their hunting and fishing conditions quickly. • Cultural and environmental considerations: Policies that respect Treaty needs and ecological balance can lead to more sustainable fishing practices, benefiting the long-term interests of licence holders. • Improved governance: Allowing the Minister to appoint members to FGCs to fill skill gaps and remove members for “just cause” enhances governance practices in line with other entities, and provides an effective ‘backstop’ should other avenues fail. • Consistency and clarity: Aligning Ministerial powers with those in similar legislation ensures consistency and clarity in regulatory practices.
--	--

Group 2: Providing for professionalism (changes to Standing Orders, retaining the option to pay councillors, changes to reporting requirements, preventing councillors also being F&G employees)

Bundling the adjustments to provide for professionalism

129. These changes have been grouped because they all relate to enhancing the professional standards of F&G. This proposal aims to elevate F&G to meet the expectations of a modern public organisation.

A standard of professionalism is mandated

130. Currently, there are no enforceable conduct expectations for members of FGCs by the Minister or the NZC. This proposal seeks to establish standards that promote a more professional F&G. There have been instances where councillors’ behaviour and conduct has fallen short of what is expected of a public entity.

131. This proposal aims to upgrade the professional standards required of councillors. Key components include introducing behaviour standards similar to other entities, changing reporting requirements, and strengthening conflicts of interest processes (including prohibiting councillors from being employees of F&G).

Changes to Standing Orders for the rules for meetings to be now mandatory for FGCs

132. FGCs and the NZC are required to comply with Part 7 of the Local Government Official Information and Meetings Act 1987 (LGOIMA) (e.g., public notification of meetings, agendas, public exclusion, and maintenance of order).

133. Under the Conservation Act provisions, Standing Orders set the rules for the NZC meetings but only provide for the Minister to set ‘model rules’ (known as standing orders) for regional FGCs. While the NZC follows Standing Orders, FGCs appear to consider them voluntary ‘model rules,’ resulting in varied practices across regions. The statute is unclear on this point so clarification would be welcomed. The lack of uniformity in meeting procedures across regions can lead to inconsistency, inefficiency, and challenges in accountability and coordination. This can also complicate decision-making, hinder effective governance and transparency across regions.

134. Additionally, standing orders are the only mechanism for declaring conflicts of interest. There have been reported instances of conflicts of interest in FGCs in the past.

135. DOC proposes to provide clarity in the Conservation Act to ensure meetings are conducted consistently across F&G, with improved clarity on handling conflicts of interest through Standing Orders.

Preventing councillors from also being F&G employees

136. This proposal aims to clarify roles and prevent a councillor of a FGC or the NZC from also being an employee of F&G, which is currently permitted. Along with the proposals above, this will support F&G improve its organisational reputation, bringing it closer into alignment with similar entities and address potential or actual conflicts of interest.

Retaining the power to pay F&G councillors in the future

137. The Minister has decided not to make provision for the payment of F&G councillors at this time but wishes to retain the ability to allow their remuneration in the future, a power already present in current legislation via regulations.¹⁴ Eleven out of thirteen councils oppose the remuneration of councillors, arguing it contradicts the organisation's ethos and could deplete declining funds.
138. Under the Cabinet Fees Framework,¹⁵ DOC estimates that the daily fee for councillors attending meetings (except the Chair), should future regulations allow it, would range from \$165 to \$226. The total annual cost of remunerating all councillors, which would need to be covered by licence fees, would be between \$164,279 – \$299,482 per annum (representing between 1.3 percent and 2.3 per cent of F&G's annual budget).
139. Although this is not a large percentage of F&G's annual budget, it represents an opportunity cost for the organisation, which could instead spend these funds on operational costs until future regulations say otherwise.

Defining clearer and more consistent reporting requirements

140. This proposal clarifies the NZC as well as FGCs will need to prepare an annual operational work plan. In future, this will need to set out objectives for the year and proposed assessment criteria, and be consistent with relevant Sports Fish and Game Management Plans (SFGMPs).
141. The proposal also requires F&G to report to DOC on any legal proceedings made under the Conservation Act, which is currently only required in instances relevant to the Wildlife Act.
142. This will improve accountability and transparency, align with existing F&G reporting requirements under the Public Finance Act, and keep DOC apprised of any legal proceedings.

Two options were considered for Group 2:

1. Option 1. Status quo. No additional conduct expectations of councillors, FGCs understanding that Standing Orders are voluntary remains, reporting requirements remain inconsistent, councillors can potentially also be employees of F&G.
2. Option 2 (preferred, with Minister's amendment – see below). Make adjustments to drive up professional standards in line with the governance arrangements of other similar public entities by introducing behaviour standards similar to other entities, clarify that FGCs must follow Standing Orders, strengthening reporting requirements and conflicts of interest processes (including that a councillor cannot also be an employee of F&G).

How do the options compare?

143. The comparison of each of the options is set out in Annex 1.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

144. Option 2 is preferred with one adjustment by the Minister because it sets professional standards for the organisation and for councillors, which is likely to go significantly improve F&G's operations and decision making. Option 2 will increase public and Ministerial confidence in the organisation and

¹⁴ Sections 26M and 26ZF.

¹⁵ The agreed Cabinet mechanism for setting fees for all statutory, non-statutory bodies and committees that are outside the Remuneration Authority or other fee-setting bodies' jurisdiction.

address the objectives of ensuring confidence in regulatory performance and ensuring effective governance and accountability.

145. DOC recommended adding remuneration for the NZC councillors to help promote professionalism and offset the increased responsibilities of the NZC role. The Minister decided that retaining the power to use this as a future option was sufficient as it is currently provided for in legislation. Following feedback from F&G, the Minister noted that a majority felt payment for the role was unnecessary and unwanted, as serving F&G on a voluntary basis was seen as ‘giving back to the sport’ rather than offsetting any costs.

Consultation/engagement themes

146. FGCs were largely opposed to payment of all councillors. Overall, the response was that it was not needed, and funds would be better directed to improving angling and hunting experience. There was some interest in councillors being given a free hunting or fishing licence, which is currently prohibited.

Costs and benefits

Costs	Benefits
<ul style="list-style-type: none">• Implementation costs: Updating and standardising Standing Orders and additional reporting requirements will incur administrative costs.• Training: Councillors and F&G staff will need training on new procedures.	<ul style="list-style-type: none">• Trust and confidence: Increased transparency and accountability will build trust among licence holders.• Consistency: Ensures uniformity in how meetings are conducted, reducing confusion and potential conflicts.• Transparency: Clearer rules for declaring conflicts of interest and improved reporting enhance trust and accountability, including between F&G and DOC on legal proceedings.• Accountability: Improved reporting aligns with public finance requirements and enhances decision-making.• Reputation: Enhances the reputation of F&G by aligning with other similar entities.

Proposal 6: Number of councillors

147. Currently, FGCs are made of up to 12 members. This amounts to 144 potential councillors across New Zealand, a large number of decision makers for a small organisation. Previous reviews have recommended a reduction in the number of councillors, which evidence suggests better supports good decision making. This needs to be balanced against ensuring a range of knowledge and diversity of licence holders on a council. There is also a lack of candidates to fill all the available places, either limiting ‘choice’ for voters, or negating the need for elections at all: 5 FGCs did not hold elections in 2024 as they did not have more candidates than seats available. The majority of FGCs already operate with less than 12 councillors (five have 8 councillors; three have 9).
148. Rebalancing the scope and number of decisions made by FGCs by reallocating key governance responsibilities to the NZC, would also support a reduction in the number of decision makers in FGCs. DOC initially suggested limiting the council size to ‘up to 7 members’ to ensure a range of views and (primarily) to avoid tie votes through specifying an odd number. This proposal is not intended to give flexibility to choose a number of council seats: the term ‘up to 7’ ensures a FGC can operate even when there are fewer than 7 candidates prepared to stand for the role.
149. Based on feedback from meetings with F&G, the Minister preferred ‘up to 8 members’. DOC acknowledges that this minor adjustment still aligns with the numbers of councillors seen at similar entities and is a significant reduction from the current maximum of 12 councillors per FGC, better reflecting the decision-making needs of an FGC and is reflective of numbers on FGCs now. The primary reason for having an odd number of councillors, to break tied votes, is already addressed by allowing the Chair to cast the deciding vote.

Two options were considered:

1. Option 1. Status quo. 'Up to 12' members per FGC.
2. Option 2 (preferred). 'Up to 8' members per FGC.

How do the options compare?

150. The comparison of each of the options is set out in Annex 1.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

151. Option 2 is the preferred option. Sufficient representation of anglers and hunters across the region was considered, and this number is judged to be optimal to improve for good decision making alongside representation.
152. The Minister has agreed to reduce the size of councils but opted for 8 members rather than 7. We understand that this decision reflects the feedback the Minister received in conversation with F&G. DOC notes that a council size of 8 is more likely to result in tied voting: however, this can be broken by the Chair providing the casting vote under existing powers.

Consultation/engagement themes

153. There was general support for reducing the number of councillors on each FGC. A few FGCs noted it should be not less than 8 or 9 to ensure diversity and a range of views while ensuring it was not unwieldy for decision making. A minority preferred to maintain 12 councillors for representation.

Costs and benefits

Costs	Benefits
<ul style="list-style-type: none">• Potential resistance: Some FGCs may resist the reduction in size, believing that a larger number of members ensures diversity and a range of views.• Risk of underrepresentation: There may be concerns about underrepresentation of certain regions or interests with a smaller council size.	<ul style="list-style-type: none">• Improved decision making: A smaller council size is more efficient and better suited for decision-making, reducing complexity and enhancing effectiveness.• Alignment with similar entities: Aligns FGCs with the size of similar public entities, promoting consistency in governance practices.

Proposal 7: Voting and election standards are improved, and 7A: introducing a fit and proper person test

Extending the eligibility to vote

154. Currently, only adult whole-season licence holders who are New Zealand residents may vote in F&G elections. This proposal will expand eligibility to support a more democratic election. Currently, many hunters and anglers who hold a licence for shorter periods, but can be equally passionate about their sport, are excluded from voting (and from standing in elections, as addressed below).
155. Registration for the electoral roll is currently an "opt-in" system, which may not be fully understood by licence holders when purchasing their licence (especially when done through third parties over the counter). DOC recommends this is amended to an "opt-out" system to encourage more members to participate in elections.
156. At the 2024 F&G elections, there were 97,089 whole-season licence holders who were entitled to vote but only 24,299 of those opted to be included on the electoral roll. Of those on the roll, only 4,058 subsequently cast votes in the 2024 election. In addition, low numbers of people standing for election meant that elections were required for only seven of the twelve FGCs. For the remaining five councils, all candidates who stood for election were deemed elected.

157. This proposal would bring the electoral system in F&G in line with modern, democratic approaches. It extends voting rights to all residents who have held any kind of adult licence in the 3-year period prior to an election which will have a significant impact on voter numbers.
158. For the 2024 elections, this would have meant that an extra 16,638 adults who were partners on a family licence, and an extra 21,919 adults who held licences valid for periods less than a whole season (e.g. day licences) would have been entitled to vote. This would have meant that 135,646 licence holders (rather than 24,299) would have been entitled to vote at the 2024 elections, providing a deeper pool of voters, more in line with the “user pays, user says” approach.

Voting electronically in elections

159. An amendment to the Conservation Act in 2017 enabled electronic voting in F&G elections in accordance with regulations, however the applicable Fish and Game Council Elections Regulations 1990 do not provide any such provision. This proposal will update these Elections Regulations to enable electronic voting which should incentivise more licence holders to take part in elections.

Extending the eligibility to stand for election

160. Currently (as with eligibility to vote above), only adult whole-season licence holders may stand for election. In line with other regulatory provisions governing elections, there must be an alignment between voter and candidate eligibility. This means that the proposal also enables a wider pool of candidates to stand for election. This increases the breadth and depth of skills and knowledge that would be available to support good council decision making, as well as ensuring a wider representation of licence holders and improved choice for voters.
161. This proposal will mean that any New Zealand resident who has held an adult licence in the 3 year term prior to an election (not just whole season) is eligible to stand for election to a FGC.
162. This proposal also clarifies the requirements on a candidate who has been removed from office (either by the Minister or because of falling short of other standards we propose are required of councillors (e.g. the fit and proper person requirement). Currently there is nothing to stop a person who has been removed from a FGC from standing again immediately, with no requirement to declare to voters that they have been previously removed.

The current process for replacing FGC members who resign is undemocratic

163. This proposal addresses what happens when councillors resign or are removed from office to replace vacant seats. Currently, any member of any FGC may resign from their office at any time by writing to the Minister. If a position on a FGC becomes vacant earlier than six months before the next election, licence holders in the region must be notified. If a majority of eligible voters request a new election to fill the vacancy, an election shall be held accordingly. However, this is unlikely given that national voter participation is around 4.2 percent. In any other case, the FGC may appoint a person to fill the vacancy after publicly announcing its intention to do so. This is undemocratic, with a risk of exploitation by FGC members, undermining the FGC’s credibility with licence holders.
164. DOC proposes that following a resignation, a FGC can choose whether to fill a vacancy or vacancies by election at any time during its term if the number of its members is below eight but at or above a minimum of three. However, a FGC *must* hold an election to fill *all* vacant positions if FGC membership falls below the minimum number of three members. This is the minimum number required for an FGC to still hold votes on its decisions.
165. It also requires that at any election, all vacant positions must be filled unless there are fewer eligible candidates standing than vacancies.
166. When a councillor resigns, this proposal provides that a copy of the resignation letter will have to be sent to the FGC, the NZC, and the Minister, and not just the Minister as currently required. This will ensure transparency and keep the NZC informed of FGC membership changes.
167. Under this proposal, no FGC will be able to appoint councillors in the manner they currently can. This change will ensure tighter democratic processes are in place following resignations.
168. In exceptional cases, the Minister would have a new power to appoint members to support decision making (proposal 5).

Sub-regions have also not worked as expected

169. Some FGCs are divided into sub-regions for election purposes to ensure representation from all parts of the region. However, anyone can stand in any sub-region, including people with no connection to it. This system can lead to perverse election results. Only some FGCs currently choose to have sub-regions.
170. Since all voters can vote for candidates in all sub-regions, sub-regions can result in candidates winning seats despite receiving fewer votes overall.
171. With the framework providing for fewer council members, sub-regions will be abolished.

Two options were considered to improve voting and election standards (7A: introducing a fit and proper person test has been evaluated separately, below):

1. Option 1. Status quo. Only adult whole season licence holders can vote and stand for election, councillors removed from office can stand in the next election, there are no term restrictions, regulations don't allow for electronic voting, in general election provisions are outdated, restrictive and undemocratic.
2. Option 2 (preferred). Elections will meet modern democratic expectations. All adult licence holders may vote and be eligible to stand in elections. Electoral roll will be by 'opt out' rather than 'opt in'. Electronic voting will be enabled. The resignation and replacement process should be clarified. Sub-regions are removed.

How do the options compare?

172. The comparison of each of the options is set out in Annex 1.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

173. Option 2 meets the objectives of the reforms and is preferred by the Minister. It expands voting and representation and makes the resignation and replacement processes more transparent. The removal of sub-regions will eliminate confusion and perverse election outcomes, as well as unnecessary variation in practice across FGCs.
174. The proposal should improve the number and quality of candidates available to be elected to FGCs, and improve decision making. It improves the democratic nature of Fish and Game, supporting the 'user pays, user says' model.

Consultation/engagement themes

175. There was general agreement that changes to voting are needed, with the principle being for licence holders to opt out rather than the status quo of opting in. FGCs are mostly in agreement with extending the eligibility to vote and electronic voting was mentioned by a few FGCs.

Costs and benefits

Costs	Benefits
<ul style="list-style-type: none">• Administrative changes: Updating the voting system and regulations to include electronic voting and extending eligibility will require administrative adjustments and potential costs.• Implementation costs: Implementing electronic voting and managing a	<ul style="list-style-type: none">• Benefit licence holders: expanding voting rights to more licence holders, introducing convenient electronic voting, allowing more diverse candidates, making the election process more inclusive, democratic, and transparent.• Increased participation: Extending voting rights and election candidate eligibility to all adult licence holders, including those with short-term licences, will significantly increase voter participation, ensuring a broader representation of interests.• Enhanced transparency: Requiring councillors who have been removed from office to declare their previous removal promotes transparency and allows voters to make informed decisions.

<p>larger voter base may incur additional costs.</p> <ul style="list-style-type: none"> • Training and education: Educating licence holders and candidates about the new voting and election processes will require resources. 	<ul style="list-style-type: none"> • Democratic replacement process: Replacing the current undemocratic process for filling vacancies with a more democratic one ensures fair representation. • Abolishing sub-regions: Removing sub-regions will simplify the election process and prevent perverse election outcomes.
---	---

Proposal 7A: Introducing a fit and proper person test to align F&G with similar entities

176. Candidates for FGCs must meet appropriate standards to be and remain public entity governors. The current test for elected councillors, including those related to sports fish and game bird offences, does not meet the standards expected of similar public entities, such as school boards.
177. The outcome sought by this proposal is to enhance the provisions to require a wider fit and proper person test, which will prevent or allow the removal of candidates with any serious criminal history from being elected or remaining in office if convicted. This proposal will also preclude candidates or councillors convicted of an offence involving sports fish, or game, or protected wildlife, or freshwater habitat, or the use of firearms, which typically result in fines rather than imprisonment.
178. The proposed pre-election fit and proper person test will include a Ministry of Justice criminal background check and an insolvency register check. The responsibility for checks will sit with FGCs at the pre-elections stage and will incur minimal cost, payable from licence fee revenue.

The options considered were:

1. Option 1. Status quo. No fit and proper person test.
2. Option 2 (preferred). Introduce a fit and proper person test at the pre-election stage so that a person is disqualified from standing for election to a FGC, or remaining as a FGC member, if, while in office, the member is or becomes:
 - i. a person who is an undischarged bankrupt
 - ii. a person who has been convicted of an offence involving freshwater fish or game or protected wildlife or freshwater habitat or the use of firearms
 - iii. a person who has been convicted of an offence punishable by imprisonment for a term of 2 years or more, or who has been sentenced to imprisonment for any other offence, unless that person has obtained a pardon, served the sentence, or otherwise suffered the penalty imposed
 - iv. a person who is disqualified under another Act.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

179. Option 2 is the preferred option. While this may be seen by some as an additional layer of bureaucracy, it ensures a fair and standardised process for all candidates, preventing unsuitable individuals from standing or remaining on FGCs. It is common practice for any governing body, reduces reputational risks, and provides greater assurance for licence holders.

Consultation/engagement themes

180. The proposals to introduce a fit and proper person test received mixed opinions. Some considered that such a requirement would create extra hurdles (potentially resulting in fewer candidates), and that it only adds bureaucracy.

Costs and benefits

Costs	Benefits
-------	----------

<ul style="list-style-type: none"> • Monetary costs involved: Conducting Ministry of Justice criminal background checks (insolvency register checks are free) will incur minimal costs. • Implementation and monitoring: Establishing and maintaining a fit and proper person test will require administrative resources, including training personnel to conduct the checks and manage the process. • Additional requirements: May deter some individuals from standing for election, potentially reducing the pool of candidates. 	<ul style="list-style-type: none"> • Aligning FGCs with similar public entities: Ensuring candidates meet high ethical and professional standards overall governance and integrity of FGCs will be enhanced. • Preventing improper people from becoming councillors: Individuals with serious criminal histories or relevant convictions will be prevented from becoming or being councillors, protecting the reputation of FGCs and the NZC and increasing public trust across F&G.
--	--

Proposal 8: Regions

181. This proposal clarifies existing provisions about the how many FGC should be proscribed in legislation. It also better enables regions and FGCs to merge when desirable in future.
182. Existing provisions allow the Minister to define up to 12 regions, change the boundaries, and abolish regions by a Ministerial notice in the Gazette. While legislation enables regions to merge, it does not specify a process for how FGCs may also merge, including mechanisms for asset transfers.
183. No prescribed mergers are specified in this proposal as DOC's analysis suggests that making changes in the delivery of functions provides for greater efficiencies than mergers. While merging regions could bring further efficiencies to F&G, driving this through now would add significant complications and may not add additional value. However, ensuring this could be carried out effectively in the future would enable mergers to happen if and when they are considered desirable.
184. The Conservation Act currently allows the Minister to alter regions by Ministerial notice in the Gazette. DOC proposes that when regions are merged, the FGCs may merge as well. Ministerial approval would be required, and for simplicity, when any future mergers would take effect at the time of F&G elections.
185. DOC also proposes amending the legislation to enable the Minister to define between 7 and 12 regions: specifying a minimum number would ensure regions could not become too large to operate effectively, or for councils to be unable to fully represent licence holders within the area.
186. The concept of mergers was supported in principle by the majority of FGCs but often considered not appropriate for their particular region at this point. Wellington and Taranaki have been considering merging and have begun to share resources (including staff such as the CEO), but a full merger has been prevented by a lack of legislative clarity in how some processes would be achieved.

Two options were considered:

1. Option 1. Status quo. Regions can merge, but the process lacks clarity. No minimum number of regions.
2. Option 2 (preferred). The number of regions will be refined in legislation to a range of 7 to 12. Clarification that when regions are merged, the respective FGCs may merge as well. Mergers would take effect at the time of F&G elections.

How do the options compare?

The comparison of each of the options is set out in Annex 1.

What option is likely to best address the problem, meet the policy objectives, and deliver the highest net benefits?

187. Option 2. There should be no fewer than 7 regions to ensure sufficient geographical and governance coverage. When regions merge, their councils and relevant assets need to be able to merge as well.

Consultation/engagement themes

188. FGCs appeared neutral on merging or supported merging for other regions (but not their own) or supported mergers if there were clear cost savings. Overall, they thought other methods would be more successful in reducing costs without risking regional connection to licence holders.

Costs and benefits

Costs	Benefits
<ul style="list-style-type: none">• Resistance to mergers: Some FGCs may resist merging due to concerns about losing regional identity and autonomy.• Potential for inequities: There may be concerns about equitable representation and resource allocation in regions that merge.	<ul style="list-style-type: none">• Enhanced efficiency: Clarifying the process for merging regions and FGCs will streamline operations and reduce administrative overhead.• Flexibility and adaptability: Allowing for a range of 7 to 12 regions provides flexibility to adapt to changing needs and circumstances.• Voluntary mergers: Allowing for mergers to be voluntary puts the choice in the hands of the FGCs.

Are the Minister's preferred options in the Cabinet paper the same as the agency's preferred options in the RIS?

The Minister has agreed with the overall approach taken for these reforms and has only taken a different approach on minor issues.

DOC recommended that Ministerial appointees be made only for specific reasons which would be set out in legislation. The Minister preferred an alternative option to appoint for any reason. In either case, Ministerial appointments are intended as a backstop measure only. It is likely this change will make only a minor difference to how appointments will work in practice, given that the scope of reasons covered all likely reasons for appointments. Specifying reasons in legislation largely provides clarity. DOC has advised the Minister that there is greater risk to the Minister in making appointees with an undefined role.

DOC suggested 'up to 7' councillors per FGC and the NZC, but the Minister preferred 'up to 8' after hearing from F&G that 8 should be the minimum number. DOC considers this is a minor adjustment and is in support, noting that it primarily recommended 7 to easily break tied votes, however, chairs already have the power to break tied votes.

What are the marginal costs and benefits of the preferred option in the Cabinet paper?

Affected groups (identify)	Comment <i>nature of cost or benefit (eg, ongoing, one-off), evidence and assumption (eg, compliance rates), risks.</i>	Impact <i>\$m present value where appropriate, for monetised impacts; high, medium or low for non-monetised impacts.</i>	Evidence Certainty <i>High, medium, or low, and explain reasoning in comment column.</i>
Additional costs of the preferred option compared to taking no action			
Regulated groups: F&G (FGCs and the NZC).	<p>One-off: There will be a direct, one-off cost to F&G to establish new procedures, a new financial strategy and a funding allocation model.</p> <p>Indirectly, F&G will benefit from its budget being more responsive to actual needs.</p> <p>No public funding will be required for F&G. The reforms will be paid for from F&G revenue.</p>	NZC will be able to work cooperatively with FGCs and develop a cohesive joined up organisation that better serves hunters and anglers and the community.	<p>High.</p> <p>There may be some issues while the changes take effect, but once in place, F&G will be better placed to achieve its regulatory responsibilities.</p>
Regulators: F&G itself is the regulator. DOC has an oversight responsibility as the legislation sits under DOC.	<p>Ongoing.</p> <p>No additional funds will be required for DOC.</p>	DOC will have a clearer view of F&G operations and will be able to provide more informed advice to the Minister.	High.

Others (e.g. wider govt, consumers, etc.)	Ongoing. No additional funds required.	The Crown will have greater confidence in F&G's ability to fulfil its regulatory obligations. Licence holders will receive better value for money. The community will benefit from F&G being responsive to other resource users' needs.	High.
Total monetised costs	<i>Costs covered by F&G revenue.</i>	<i>Costs covered by F&G revenue.</i>	<i>Costs covered by F&G revenue.</i>

Section 3: Delivering an option

How will the proposal be implemented?

189. The Parliamentary Counsel Office will draft the regulatory amendments, subject to Cabinet approval. The draft will go back to Cabinet for final approval.
190. DOC anticipate enactment will be approximately June 2026, with phased implementation beginning shortly after.
191. Developing secondary legislation will be a key factor in determining the final transition period timelines.
192. Despite the reform, F&G will retain considerable autonomy from government. The Minister's powers will extend in line with similar public entities, but the Minister will remain "at arm's-length." As the Minister's advisers, DOC's role in implementing the reforms will be somewhat indirect.
193. However, DOC will ensure that F&G is aware of and implement the legislative changes. DOC will engage with the NZC to determine the support they need, and the reforms will be carried out in phases as reflected in the Bill's drafting. For example, adjustments to the number of councillors at the next election, implement budget process changes as part of secondary legislation, and considering the next budget cycle. DOC anticipates that the transition to the reformed system will be complex.

How will the proposal be monitored, evaluated, and reviewed?

194. The NZC will be responsible for implementing the changes and will engage with FGCs on how the changes will be implemented. The NZC will be expected to report to the Minister on progress with changes and any issues that arise.
195. Improvements in annual report structures in F&G will enable DOC to track performance and further changes can be made in future.
196. Recently, DOC has observed negative media coverage about F&G, along with numerous resignations from F&G councillors (sometimes due to personal reasons, but also to governance issues and tense relationships with the wider community). Changes in public perception and resignation trends will be relevant factors for DOC to assess the success of the reforms from a governance and a stakeholder relationship management perspective.

Success may not be known for a few years

197. To measure the success or failure of the reforms, several key indicators and metrics can be used. In summary, indicators will cover e.g. licence sales and revenue, cost efficiency, licence holder

satisfaction, economic impact, organisational cohesion, and regulatory compliance, as per the table below.

198. Monitoring will be conducted through various channels, primarily using existing licence holder activity surveys and annual performance reports from FGCs and the NZC. By monitoring these indicators over time, the Government and F&G can assess the effectiveness of the legislative changes.

Indicators	Success	Failure
Licence sales and revenue (measured from annual performance reports)	<ul style="list-style-type: none"> An increase in the number of freshwater angler and game bird licences sold annually. Stabilisation or increase in revenue from licence sales despite any changes in fees. 	<ul style="list-style-type: none"> Continued or accelerated decline in the number of licences sold annually. Significant drop in revenue from licence sales.
Cost efficiency (measured from annual performance reports)	<ul style="list-style-type: none"> Reduction in operational costs due to minimised duplication and waste across F&G. Decrease in the cost per licence issued, reflecting improved efficiency. 	<ul style="list-style-type: none"> Rising operational costs despite efforts to minimise duplication and waste. Increase in the cost per licence issued, indicating inefficiencies.
Licence holder satisfaction (measured from regular licence holder activity surveys)	<ul style="list-style-type: none"> Positive feedback from anglers and hunters regarding their experience and perceived value for money. Increase in the number of repeat licence purchases by satisfied anglers and game bird hunters. 	<ul style="list-style-type: none"> Negative feedback from licence holders regarding their experience and value for money. Reduction in the number of repeat licence purchases.
Economic impact (measured from annual performance reports)	<ul style="list-style-type: none"> Increase in the total spending by anglers on their trips, indicating higher participation and economic activity. Growth in economic activity in regions popular for game bird hunting and fishing. 	<ul style="list-style-type: none"> Decrease in the total spending by anglers on their trips. Decline in economic activity in regions popular for game bird hunting and fishing.
Organisational cohesion (measured from annual performance reports)	<ul style="list-style-type: none"> Fewer instances of duplicated efforts and resources across councils. 	<ul style="list-style-type: none"> Continued or increased instances of duplicated efforts and resources.
Regulatory compliance (measured from annual performance reports)	<ul style="list-style-type: none"> Successful updates to provisions and powers in line with modern public entity requirements. 	<ul style="list-style-type: none"> Failure to follow provisions in line with modern public entity requirements.
Participation in Fish and Game elections (measured using Fish and Game data on electoral turnout and candidate numbers)	<ul style="list-style-type: none"> Increased voter turnout in F&G's election. Higher number of candidates standing for F&G election. 	<ul style="list-style-type: none"> Continued low or decrease in voter turnout in F&G's election. Continued low or decrease in candidates standing for F&G election.

Annex One: How do the options compare to the status quo/counterfactual?

Key for qualitative judgements	
++	much better than doing nothing/the status quo/counterfactual
+	better than doing nothing/the status quo/counterfactual
0	about the same as doing nothing/the status quo/counterfactual
-	worse than doing nothing/the status quo/counterfactual
--	much worse than doing nothing/the status quo/counterfactual

Proposal 1: Rebalance the functions and responsibilities between the NZC and FGCs				
	Option One – Status Quo / Counterfactual	Option Two – Targeted changes – NZC sets frameworks for action. FGC's decision-making largely retained but must be within frameworks set by NZC	Option Three (preferred) – FGCs and NZC split decision-making – NZC take over key corporate functions, set strategic direction and action plans including for monitoring, compliance, advocacy and planning and reporting	Option Four – NZC is solely responsible for achieving regulatory responsibilities. This option was out of scope of the reforms
Value for money	--	+	++	N/A
Effective/efficient	-	+	++	N/A
Regional/national balance	+	++	++	N/A

Transparent roles/responsibilities	--	+	++	N/A
Overall assessment	1	5	8	

Proposal 2: Centralised licence fee and budget allocation

	Option One – Status Quo / Counterfactual	Option Two (preferred) – NZC issues licences centrally, collects fees, develops a financial strategy and F&G funding model, and sets direction for the purpose of and use of accumulated funds, that is seen to be fair
Value for money	--	++
Effective/efficient	--	++
Regional/national balance	+	++
Transparent roles/responsibilities	--	++
Overall assessment	1	8

Proposal 3: Mandate the requirement for FGCs to take account of non-hunting interests

	Option One – Status Quo / Counterfactual	Option Two (preferred) – F&G must take account more generally of non-hunting interests (not only the ones in SFGMPs), describe how conflicts with
--	--	---

		<i>non-hunting interests will be managed and account for a specific list of interests in legislation that take precedence over F&G's needs, and give authority to FGCs without needing to gain permission from DOC</i>
Value for money	+	0
Effective/efficient	-	++
Regional/national balance	-	++
Transparent roles/responsibilities	+	++
Overall assessment	0	6

Proposal 4: Membership of the NZC			
	Option One – Status Quo / Counterfactual	Option Two (preferred) – NZC is made up of Chairs of FGCs. Chair of NZC is appointed by members of the NZC (i.e. Chairs of FGCs appoint the Chair of NZC)	Option Three – Minister appoints all members of the NZC (these may be independent of F&G and not necessarily F&G councillors)
Value for money	++	++	++
Effective/efficient	-	++	++
Regional/national balance	-	++	--

Transparent roles/responsibilities	-	+	0
Overall assessment	-1	7	4

Proposal 5 Checks and balances and transparency

Group 1: Adjustment of Ministerial powers

	Option One – Status Quo / Counterfactual	Option Two (preferred) – Adjust the powers of the Minister to bring them in line with similar public entities, align Ministerial powers in relation to the Minister making appointments, “just cause” removal of councillors, reviewing notices, and preventing the transfer of sports fish
Value for money	-	+
Effective/efficient	0	+
Regional/national balance	+	+
Transparent roles/responsibilities	-	++
Overall assessment	-1	5

Proposal 5: Membership of the NZC

Group 2: Providing for professionalism

	Option One – Status Quo / Counterfactual	Option Two (preferred) – Make adjustments to drive up professional standards in line with the governance arrangements of other similar public entities by introducing behaviour standards similar to other
--	--	--

		<i>entities, changes to reporting requirements, and strengthening of conflicts of interest processes</i>
Value for money	0	0
Effective/efficient	+	+
Regional/national balance	0	+
Transparent roles/responsibilities	0	++
Overall assessment	1	4

Proposal 6: Number of councillors

	<i>Option One – Status Quo / Counterfactual</i>	<i>Option Two (preferred) – 8 members per FGC</i>
Value for money	0	++
Effective/efficient	-	+
Regional/national balance	0	0
Transparent roles/responsibilities	0	0
Overall assessment	-1	3

Proposal 7: Voting and election standards are improved

	Option One – Status Quo / Counterfactual	Option Two (preferred) – All adult licence holders may vote and be eligible to stand in elections. A councillor who has been removed from office must declare they had previously been removed. Electronic voting will be allowed. The resignation and replacement process has been clarified. In general, elections will meet modern democratic expectations
Value for money	-	+
Effective/efficient	-	+
Regional/national balance	0	+
Transparent roles/responsibilities	-	++
Overall assessment	-3	5

Proposal 7A: Introducing a fit and proper person test to align F&G with similar entities

	Option One – Status Quo / Counterfactual	Option Two (preferred) – Introduce a fit and proper person test at the pre-election stage
Value for money	+	-
Effective/efficient	0	+
Regional/national balance	0	0
Transparent roles/responsibilities	0	++

Overall assessment	1	2
--------------------	---	---

Proposal 8: Regions		
	Option One – Status Quo / Counterfactual	Option Two (preferred) – <i>The number of regions will be refined in legislation as a range of 7 to 12. Clarification that when regions are merged, the respective FGCs may merge as well</i>
Value for money	0	+
Effective/efficient	+	++
Regional/national balance	+	++
Transparent roles/responsibilities	0	+
Overall assessment	2	6

Miranda Grimmer

From: Sandra Woodhead
Sent: Wednesday, 2 July 2025 3:04 pm
To: Joanne de Lange; Karen Rainbow
Subject: FW: Key messages for Fish and Game

I did send this to an individual member who wanted some key messages – from Te Korowai

Sandra Woodhead
Operations Manager Whanganui District

Phone: 9(2)(a)

www.doc.govt.nz



Depart
Conser

From: Sandra Woodhead <sawoodhead@doc.govt.nz>
Sent: Thursday, 8 May 2025 12:13 pm
To: 9(2)(a)
Cc: Sarah Classens <sclassens@doc.govt.nz>
Subject: Key messages for Fish and Game

Morena 9(2)(a),

These are the key messages that went to all PSGE for Iwi (link attached)– if you have any thoughts please let me know and I will pass onto the minister's team – such as extending the length of time for licences.

Hon James Meager is the Minister for Hunting and Fishing,

Key messages:

What do Fish and Game do?

- Fish and Game New Zealand (Fish and Game), through the Conservation Act 1987, are mandated to manage, enhance, and maintain sports fish and game birds; and represent the interests of anglers and hunters.
- The Minister for Hunting and Fishing (the Minister) works with Fish and Game on a regular basis to approve the licence fee and conditions for fishing and hunting sports fish and game birds, for example.
- The Minister was previously the Hon Todd McClay but is now Hon James Meager.

Why is the Minister considering changes to Fish and Game?

- The Minister is exploring potential ways to enhance the effectiveness and efficiency of Fish and Game.
- This is in response to the Government's commitment to support and strengthen Fish and Game, and in response to long-standing challenges that have been evidenced, for example, in the [*2021 Review of the governance of Fish and Game New Zealand and the regional Fish and Game councils*](#).

Who has the Minister sent letters to?

- The former Minister sent letters to all Fish and Game councils and 20 Post-Settlement Governance Entities (PSGEs) who have a statutory relationship and/or arrangement with Fish and

Ngaa mihi

Sandy

Attachment C: Summary of policy development to date

Minister McClay has made initial decisions on policy direction

1. Policy decisions made to date have not been taken to Cabinet and therefore have not been discussed publicly. However, Minister McClay has signalled publicly that he was looking to modernise and refocus Fish and Game.
2. The intention has been to target engagement with Fish and Game to build relationships, gather views on the **existing** model, and pave the way for final policy decisions. Views from specific Post-Settlement Governance Entities (PSGEs) with a statutory relationship or arrangement with Fish and Game in their settlement act or deed have also been approached for views.

Long-standing challenges to address within current structure

3. Reports of dysfunction and complaints relating to Fish and Game's governance and regulatory practice have coloured the perception of the organisation over the years. Fish and Game themselves acknowledge the need for change, particularly regarding internal relationships and to address the recent trending down of licence sales.
4. The Government has committed to "support Fish and Game". Minister McClay agreed the objectives for Fish and Game would be to:
 - Ensure confidence in regulatory performance
 - Provide for effective governance and accountability
 - Ensure value for money for licence holders through efficient use of resources
5. The scope of policy work would:
 - be narrowed to addressing challenges but retaining the benefits of Fish and Game's current regional and national structure and governance; the intention was not to conduct a wholesale review of Fish and Game's role, or options for others within the system to perform their functions instead; **but**
 - be broader than the Ministerially commissioned 2021 Governance Review. The Governance Review scope was limited to governance and structure only, and was unable to consider the spilt or balance of Fish and Game functions between the regional and national levels;
 - existing Treaty settlements would not be impacted.

Move towards modernising and refocusing Fish and Game

6. These challenges stem from Fish and Game's legislative settings. These settings create:
 - variable governance performance resulting from weak accountability practice (disengaged licence holders and inability for the NZC to drive change)
 - inefficient use of licence holder funds due to the autonomous and federated structure of FGCs (duplication of effort and little cohesion).
7. This ultimately results in outcomes that do not always deliver the best service to licence holders or impact on others in the community including aviation, farmers, and iwi and hapū.
8. Modernising and refocusing Fish and Game should result in a more trusted, accountable, and cohesive organisation that provides value for money for its licence holders. The intention has been to support regional FGCs to focus on providing value at place while the NZC would be enabled to drive improvements and strategic direction.

A framework for change has been provisionally agreed

9. Minister McClay provisionally agreed to a framework for change, and a coherent package of measures. The key elements of the framework are:

Shifting more decision-making authority to NZC, in consultation with FGCs, for efficiency and effectiveness

- Key elements of the shift include:
 - NZC collecting licence fees and redistributing funds based on an allocation model (core functions funded first, remainder distributed according to angler/hunter activity, and a contestable fund).
 - NZC could develop binding national policies (in consultation with FGCs) to create consistency across both core (e.g. compliance, monitoring, advocacy) and corporate (e.g. salaries, job descriptions, health and safety) functions. This includes standard forms/templates for planning and reporting.
- This would ensure greater rationalisation of budgeting decisions and value for money; create cohesion across the organisation and strategic direction for advocacy; and improve performance monitoring and accountability. It also provides for local decision-making over local issues (e.g. species management and habitat), which is considered to be the cornerstone of Fish and Game.

Decision-making supported by improved and updated governance practice

- To support the shift in NZC decision-making authority and overall governance practice changes include:
 - NZC would be formed of chairs of FGCs to maintain regional link and recognising the importance of decisions being made by NZC.
 - A reduction in the number of councillors in each FGC from 'up to 12' to 'up to 7'.
 - Minister would be able to appoint up to two councillors to FGCs as necessary in exceptional circumstances and strengthened power to remove councillors for "just cause" to provide interventions where Fish and Game are unable to resolve issues within the organisation.
 - Increased eligibility to vote or stand in elections (e.g. opt-in and wider than just whole season licence holders), including a fit and proper test, to improve diversity of views on councils and calibre of councillors.
 - An 'honorarium' payment, funded by the licence fee, to recognise the service provided by councillors and potentially encourage for a wider range of candidates.
 - A raft of other governance measures that would bring Fish and Game into step with practice in other entities.
 - Greater consideration of non-hunting and fishing interests by Fish and Game particularly where safety or protection of highly threatened fish species are at risk to improve outcomes for wider communities, including iwi and hapū.

Flexibility to enable further efficiencies

- One of the main recommendations from the Governance Review was to reduce the number of councils by merger. This was the primary recommendation to create efficiencies, because the shift of functions (an alternative way to create efficiencies) was out of scope of the Governance Review. Minister McClay agreed to retain twelve FGCs but provide for better enabling the merger of regions (voluntarily or at Minister direction) in the future. No mergers are proposed as part of this programme of work.

10. The intention is that information gathered through the informal engagement stage would inform refinements to this framework to support final policy decisions.

Attachment D: Analysis of Fish and Game New Zealand responses to Minister McClay's November letters

More decision-making authority to the New Zealand Council (NZC) likely to be biggest point of contention

1. While most councils support becoming a more cohesive organisation to produce efficiencies and effectiveness and centralising the licence fee collection, exactly how to get there varies. In-principle the proposed allocation model (to fund core functions first, with remainder distributed according to angler/hunter activity and a contestable fund) is likely to be supported by most, although we note that 'buy-in' or ability for Fish and Game Councils (FGCs) to influence this model - that would in future be under the control of NZC- will be key.
2. 9(2)(g)(i) are likely to oppose greater decision-making authority for NZC due to concerns of loss of regional autonomy. 9(2)(g)(i) to a lesser degree, share this concern and propose an improved coordination role for NZC and emphasises that NZC should not control.

General support for improvements to governance practice and decision-making

3. Views largely align with proposals to improve eligibility to vote (e.g. opt-out enrolment as opposed to status quo which requires licence holders to opt-in to enrolment to vote) and stand for election (wider than just whole season licence holders). There was also general agreement that the number of councillors on each FGC could be reduced to support improved decision-making but maintain a range of views.
4. However, the fit and proper person test and criteria to remove councillors both had mixed opinions. Some councils felt the fit and proper person test would create extra hurdles (potentially resulting in reduced candidates) or add bureaucracy. Some councils think legislation is fine as is to remove councillors, should exhaust all internal avenues before going to Minister, and need good reasons and criteria.

Neutral or little support to merge regions or receive an honorarium

5. There was some support for merging regions, if evidence supported efficiencies. However, most councils did not want to merge and saw other avenues to creating efficiencies and improving effectiveness. Five councils suggested redefining council boundaries as an opportunity to create efficiencies from a management of the physical resource perspective.
6. 11 of the 13 councils did not support an honorarium, which would provide councillors with a payment for performing their functions and duties paid for by licence holder fees. The honorarium was generally unsupported and particularly at a regional FGC level. There was some support for an honorarium if it increased younger candidates or provided compensation for the increasing workload of NZC. Although overall councils felt this was not in keeping with the ethos of the role.

Biggest source of tension between NZC and FGCs is communications and funding

7. Some councils noted they have a good working relationship with NZC (for example, 9(2)(g)(i)). Suggestions to improve the relationship between NZC and FGCs were to increase transparency of decision-making and NZC spending and communications. There is a perception that NZC is taking money away from FGCs and reducing what they can do for their licence holders.

Most see regional link to NZC and certainty of position as important

8. Generally, most councils saw a need to maintain the regional link to NZC (apart from 9(2)(g)(i) and are less supportive of Ministerial appointments particularly if not from the pool of licence holders.

9. Most councils saw a need to create certainty of position on NZC, with some councils suggesting that a NZC representative only be removed by their FGC by Ministerial approval or resignation.

Status report excerpt - week beginning 24 March 2025**1.1 Update on responses received from Post-Settlement Governance Entities relating to Fish and Game targeted engagement**

- This item updates you on the Post-Settlement Governance Entities (PSGEs) responses, and other feedback received regarding Fish and Game modernisation.
- In December 2024, Minister McClay wrote to 20 PSGEs who have a statutory relationship or arrangement with Fish and Game in their settlements or deeds. DOC, via our existing relationship channels, also reached out to other iwi and hapū as opportunities arose over January - February. Responses were invited by the end of February, although we may receive subsequent feedback.
- You received one written response from Ngāi Tahu, with the other three responses received verbally via DOC.

Summary of responses:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Next steps

- You will receive a policy paper seeking final decisions on proposals to support Fish and Game to improve its operation and governance by the end of March.
- At this stage we note that policy proposals relating to improving the consideration of non-hunting and fishing interests in Fish and Game decision-making and the possibility of Ministerial appointments may go some way towards improving outcomes for iwi and hapū.
- We note that Select Committee will provide further opportunity to submit feedback and refine policies.
- You may wish to meet with iwi and hapū in response to their requests, noting that they wish to discuss your portfolios more broadly.

IN-CONFIDENCE

Minister for Hunting and Fishing, Minister for Hunting and Fishing's office, and Department of Conservation eyes only.

Contact: *Sam Thomas, Director Policy:* 9(2)(a) [REDACTED]

Briefing: Fish and Game New Zealand draft Cabinet paper

To	Minister for Hunting and Fishing	Date submitted	16 April 2025
Action sought	Approve draft Fish and Game New Zealand (Fish and Game) Cabinet paper for agency and ministerial consultation.	Priority	Very High
Reference	25-B-0157	DocCM	DOC-10237238
Security Level	In Confidence		

Risk Assessment	Medium Timeframes are tight to meet immediate Cabinet deadlines and support your objective to pass legislation this term. Fish and Game, Treaty partners, and other interested parties may regard the Cabinet decisions and subsequent announcement as unexpected. The communications plan should mitigate some risks.	Timeframe	17 April 2025 Feedback required by 17 April to begin agency and ministerial consultation over 22-29 April (five working days) to lodge Cabinet paper by 1 May.
Attachments	Attachment A – Draft Cabinet paper – Fish and Game New Zealand Governance and Organisational Improvements Amendment Bill Attachment B – Draft Regulatory Impact Statement – Strengthening and improving Fish and Game New Zealand		

Contacts	
Name and position	Phone
Sam Thomas – Director, Policy	9(2)(a)
Nicola Molloy – Manager, Hunting, Fishing, and Economic Development	9(2)(a)

Executive summary – Whakarāpopoto ā kaiwhakahaere

1. Following your final policy approvals [25-B-0147 refers] this paper seeks your feedback on and approval to circulate the draft *Fish and Game Governance and Organisational Improvements Amendment Bill* Cabinet paper.
2. The draft Cabinet paper seeks approval to a package of proposals to begin drafting a Bill to improve the governance and operation of Fish and Game.
3. Your feedback on the draft Cabinet paper would be needed by 17 April to enable Agency and Ministerial consultation to begin on 22 April. This would support lodgement on 1 May for Cabinet Economic Policy Committee (ECO) on 7 May. Any delays to this timeframe would mean slipping to ECO on 14 May.
4. To support this draft Cabinet paper, we also provide:
 - initial advice on communicating Cabinet decisions with key stakeholders (e.g. Fish and Game), Treaty partners, and other interested parties. You expressed an interest making an announcement shortly after Cabinet decisions, and the Department of Conservation (DOC) is ready to support this. There are some potential limitations for a May announcement, including pressures on Fish and Game during this time. We provide alternative options, should you prefer.
 - the draft regulatory impact statement (RIS). This is a departmental document, but you may wish to provide comments. The draft RIS must be circulated as part of Ministerial and Agency consultation, and the final RIS must be lodged with the Cabinet Paper.
5. Timeframes to pass legislation this term are tight. Delays to the timeframes stepped out below either puts pressure on Parliamentary Counsel Office (PCO) drafting time or raises the risk that you will be unable to pass legislation this term.
6. Current timeframes are:

Date	Activity
22-29 April (five working days due to Easter and ANZAC day)	Agency and ministerial consultation
1 May	Lodge
7 May	ECO
12 May	Cabinet
Mid-May – mid-October (five months)	PCO drafting
Late-October – May 2026 (six months)	Bill introduced and referred to select committee, second reading, Committee of the Whole House, third reading
June 2026	Royal assent

7. Following Cabinet's decision in May, we will provide you with further advice and materials to support an announcement and/or media statement.

We recommend that you ... (Ngā tohutohu)

		Decision
a)	Agree to consider and provide feedback on the draft Cabinet paper by 17 April.	Yes / No

b)	Note Agency and Ministerial consultation will run over 22 – 29 April (five working days) subject to your feedback on the draft Cabinet paper.	Noted
c)	Note the draft RIS must be circulated with the draft Cabinet paper for Ministerial consultation. A final version will be lodged with the final Cabinet Paper.	Noted
d)	Discuss your preferences for an announcement at your meeting with officials on 30 April.	Yes / No

Date: / /

Sam Thomas
Director, Policy

Date: / /

Hon James Meager
Minister for Hunting and Fishing

Purpose – Te aronga

1. To support your priority to modernise and improve Fish and Game, this briefing provides you with:
 - a draft *Fish and Game Governance and Organisational Improvements Amendment Bill* Cabinet paper for your feedback and approval to circulate for agency and ministerial consultation
 - initial advice on how you could communicate Cabinet decisions with key stakeholders, Treaty partners, and other interested parties
 - the draft RIS for your information. The RIS must also be circulated as part of Ministerial and Agency consultation.

Background and context – Te horopaki

2. You intend to pass legislation this term to support Fish and Game to be more efficient and effective. You made final policy decisions on 11 April to support this objective [24-B-0147 refers].
3. These decisions are reflected in the draft Cabinet paper at Attachment A.
4. This paper seeks Cabinet approval to begin drafting a Bill to introduce your proposed reforms. These proposals will improve Fish and Game's effectiveness and provide better value for money for their licence holders. Your proposals are a key priority for your Hunting and Fishing portfolio and support wider Government objectives to tackle cost of living challenges and grow economic activity.
5. To meet your objectives, the draft Cabinet paper steps out a package of proposals. We propose that you briefly outline the key proposals in the paper, with fuller detail contained in the Schedule to the paper. The paper also sets out your proposal for a stand-alone Fish and Game Act. 9(2)(h)
6. The paper sets out your broad intent to:

- maintain regional decision making over local matters, which is the cornerstone of the organisation, by focusing local knowledge and resource on improving hunting and fishing opportunities for their region
 - no longer require individual regional councils to spend time on some administrative activities, where they are more effectively done by the National Council
 - strengthen the leadership role of the National Council to set clear, coherent direction, collect the licence fee, and disperse it so it better supports the core functions of the organisation, including getting funds to where they are needed to support angler and hunter activity
 - improve the 'user pays, user says' system and how Fish and Game make decisions, including how it considers non-hunting and fishing interests in decision-making
 - strengthen checks and balances to improve accountabilities and transparency and provide adequate backstops so that the responsible Minister can intervene as necessary in exceptional circumstances
 - more generally modernise the organisation in line with other entities to support further efficiencies and effectiveness.
7. In line with this broad policy intent, we also propose in the Cabinet paper that you seek delegated authority to make other minor and technical changes.
 8. The Bill is a category five (referred to select committee in 2025) priority in the 2025 Legislative Programme.

Communicating your proposals following Cabinet approval

Timing

9. We understand you would like to publicly announce your intention to introduce a Bill shortly after Cabinet agrees to proceed with drafting legislation, preferably before Budget night 2025 (scheduled for 22 May).
10. This would mean making an announcement between 12 May (expected Cabinet approval) and 22 May (Budget night 2025). DOC can provide communications material to support an announcement at this point.
11. However, we note that this period coincides with a busy time for Fish and Game, who will be managing the opening weeks of game bird season which commences on 5 May. It may be difficult for Fish and Game – particularly regional councils – to review the proposals and respond to any requests for comment, or to meet with you to discuss your proposals. DOC also notes you plan to introduce Herds of Special Interest (HOSI) legislation and may be in a position to make an announcement on commencing a wapiti Herd Management Plan statutory process, in this same window.
12. Other options are available:
 - Make a public announcement at an event, to media and a wider group of interested parties, including Fish and Game after Budget 2025 night. This option is more time intensive but would allow you to reach a wider group of interested parties more directly. Holding an event after Budget night would provide more time to arrange a suitable event and/or arrange to meet key individuals to provide advanced notification, avoiding a busy period for Fish and Game. We understand a Parliamentary Game Bird Hunt, organised by Fish and Game, is pencilled-in for mid-June, and a meeting of the New Zealand Council is scheduled for 17/18 June. You may also wish to hold a closed meeting with Fish and Game shortly before a public announcement to provide them with advance notice of your proposal to introduce a Bill.

- Hold a closed meeting with Fish and Game, followed by a media statement. This option is less time intensive, while still allowing you to ensure that Fish and Game is informed directly by you and that other interested parties are alerted to your announcement. This could be before or after Budget night, noting the limitations outlined above will affect Fish and Game availability. This would have a lower impact than a public announcement through an event opportunity but would still be picked up by interested parties. DOC could also promote this via our social media channels should this be your preference.
13. In all cases, we recommend providing advanced notice to key individuals (e.g. Chair and CEO of Fish and Game) about an announcement. This would be an important part of staging any announcement, ensuring Fish and Game is prepared to respond.
 14. An early steer on your preferences would be helpful. You can also discuss this, and other communications across your hunting and fishing portfolio, with officials at your meeting on 30 April.
 15. DOC is preparing a fuller communications plan and supporting material, which we will share with your office in due course.
 16. We recommend that you release the Cabinet paper (with any necessary redactions) to coincide with your announcement. The Cabinet Manual states that Cabinet papers must be released within 30 days of Cabinet decisions unless there is a specific reason not to. We do not believe this Cabinet paper meets the grounds for withholding.

Regulatory Impact Statement (RIS) process

17. The draft RIS is provided at Attachment B. It supports Cabinet to make well informed decisions on the policy changes you are proposing to make to Fish and Game. It includes policy analysis that has informed our advice and recommendations. It is currently being reviewed by the Regulatory Impact Assessment Panel (RIAP), which comprises of DOC policy officials who have not worked on these policy proposals.
18. The RIS is a departmental document, so the final content is at the discretion of the agency. However, you can provide comment should you wish to. The draft RIS must be circulated as part of Ministerial and Agency consultation.
19. We will make any changes required by the RIAP and attach the final version of the RIS to the final Cabinet Paper along with a declaration of whether the RIS meets, partially meets, or fails to meet the requirements. We expect the RIS will likely receive a 'partially meets' (due to lack of public consultation on the policy proposals).

Risk assessment – Aronga tūraru

20. Timeframes are tight to pass legislation this term. Quick turnaround of this paper will mitigate some of this risk, enabling us to lodge the paper for the earliest possible Cabinet opportunity (ECO on 7 May). Agency and Ministerial consultation are running over the Easter and ANZAC holidays which may impact ability to respond. Any delays to completing Ministerial consultation would slip lodgement, with the next opportunity for discussion at ECO on 14 May.
21. Fish and Game, Treaty partners, and other interested parties are unlikely to fully expect the Cabinet decisions and subsequent announcement of a Bill being drafted without wider consultation. We anticipate that your proposals will likely generate both positive and negative reactions from councils and their councillors. Those who are not supportive are likely to be vocal, raising concerns through the media and encouraging licence holders to write in opposition to the proposals.
22. The communications plan focuses on relationship management which may mitigate some of this risk, as will informing Fish and Game's CEO and NZC Chair.

Treaty principles (section 4) – Ngā mātaḥono Tiriti (section 4)

23. Section 4 of the Conservation Act 1987 (the Act) directs that the Act shall so be interpreted and administered as to give effect to the principles of the Treaty (and extends to all legislation listed in Schedule 1 of that Act, which includes the Wildlife Act 1953). The section 4 directive applies to the development of your policy decisions, and to all decisions taken by Fish and Game at both the national and regional levels.
24. The informal targeted engagement approach goes some way towards meeting section 4 obligations, noting the next opportunity for engagement is the Select Committee stage once a Bill is introduced.
25. From the feedback received to date from specific Post-Settlement Governance Entities and iwi and hapū contacted via DOC's existing relationship channels, DOC does not recommend any new or revised policy proposals. DOC notes that policy proposals relating to improving the consideration of non-hunting and fishing interests in Fish and Game decision-making and the possibility of Ministerial appointments may go some way towards improving outcomes for iwi and hapū.
26. DOC does not anticipate the proposals in this paper will have any impacts on Settlement Acts or Deeds, including Ngāi Tahu's role as a statutory advisor to all South Island FGCs on matters relating to native game birds.
27. Further information is included in briefing 25-B-0120.

Consultation – Kōrero whakawhiti

28. DOC has not consulted other agencies in the development of this briefing. Agency and Ministerial consultation on the draft Cabinet paper and RIS will be over 22-29 April.
29. Fish and Game, Treaty partners, and other interested parties have not been consulted or engaged on your policy proposals themselves. We expect the Select Committee process will provide this opportunity.
30. Further information is included in briefing 25-B-0120.

Financial implications – Te hiraunga pūtea

31. There are no financial implications arising from this paper.
32. Proposals, such as remuneration for certain roles, may incur additional costs. However, these would be borne by Fish and Game rather than the Crown [briefing 25-B-0120 refers].

Legal implications – Te hiraunga a ture

33. You are seeking Cabinet agreement to draft a Bill for introduction to the House later in the year. Subject to that agreement we will be working with the PCO to prepare a Bill. We will keep you informed once work commences.

Next steps – Ngā tāwhaitanga

34. Next steps:
 - We are aiming for lodgement on 1 May for discussion at ECO on 7 May and Cabinet on 12 May.
 - To support this, your feedback on the draft Cabinet paper is needed by Thursday 17 April.
 - We will circulate the draft Cabinet paper with other government agencies over 22-29 April, in support of parallel Ministerial consultation managed by your office.

- We will provide you with talking points by 5 May to support the ECO meeting. DOC will be available to support you at the ECO meeting should you require.
- There are opportunities to discuss feedback from Ministerial consultation, and a communications plan, at your meeting with officials on 30 April.

ENDS

In Confidence

Office of the Minister for Hunting and Fishing

Cabinet Economic Policy Committee

Fish and Game New Zealand Governance and Organisational Improvements Amendment Bill

Proposal

- 1 I seek Cabinet approval to provide drafting instructions to the Parliamentary Counsel Office (PCO) for a package of proposals to improve Fish and Game New Zealand's (Fish and Game) governance and organisational practice.

Relation to government priorities

- 2 Supporting Fish and Game is one of the key priorities for the newly established Hunting and Fishing portfolio. My proposals will modernise and improve the effectiveness and efficiency of Fish and Game and provide better experiences and value-for-money for licence holders. This will contribute to tackling the current cost of living challenge; supporting tourism and economic activity in our regions; and better enabling hunting and fishing, a significant recreational activity in our country.

Executive Summary

- 3 I want to make it easier for New Zealanders to hunt and fish. This recreational activity is important to our country and supports tourism and economic activity in the regions.
- 4 Fish and Game manage New Zealand's sports fish and game bird resource. This arms-length organisation is formed of 12 separate regional councils and one National Council. It is funded by licence payers in a 'user pays, user says' system, with revenue of about \$13 million annually.
- 5 While Fish and Game does important work for tourism, regional economies, our environment and wellbeing, they are not operating or governing the resource and revenue as well as they could be. Several reports and audits over the years, as well as ongoing complaints to Ministers and media attention, clearly bring this to light. This erodes trust in the organisation, means hunting and fishing resources are not being managed as effectively as they should be, and results in poor value for licence holders.
- 6 I intend to modernise and improve Fish and Game to be a more trusted, accountable, and cohesive organisation that manages resources well and provides strong outcomes and good value-for-money for licence holders. This will ensure future generations can continue to hunt and fish.

Summary of decisions sought

- 7 My broad intent for my proposals is to:
- 7.1 maintain regional decision making over local matters, which is the cornerstone of the organisation, by focusing local knowledge and resource on improving hunting and fishing opportunities for their region
 - 7.2 no longer require individual regional councils to spend time on some administrative activities, where they are more effectively done by the National Council
 - 7.3 strengthen the leadership role of the National Council to set clear, coherent direction, collect the licence fee, and disperse it so it better supports the core functions of the organisation, including getting funds to where they are needed to support angler and hunter activity
 - 7.4 improve the 'user pays, user says' system and how Fish and Game make decisions, including how it considers non-hunting and fishing interests in decision-making
 - 7.5 strengthen checks and balances to improve accountabilities and transparency and provide adequate backstops so that the responsible Minister can intervene as necessary in exceptional circumstances
 - 7.6 more generally modernise the organisation in line with other entities to support further efficiencies and effectiveness.
- 8 I seek agreement to a package of proposals (attached at **Appendix One**) which will support this intent.
- 9 I also intend to create a stand-alone Fish and Game Act, similar to the Game Animal Council Act 2013, to raise the profile of the organisation.

Next steps

- 10 If agreed, I will instruct the Department of Conservation (DOC) to provide drafting instructions to PCO. My intent is to return to Cabinet seeking approval to introduce a Bill to the House later this year.

Background: Making it easy to hunt and fish and opportunity for growth

- 11 Fish and Game was formed in early 1990, shifting from the 24 acclimatisation societies of the 1880's. Fish and Game is independent, with most of their \$13 million annual revenue coming from licence fee sales. Direction of the organisation is set by licence holders who are publicly elected to each of the 12 regional councils. Regional councils manage the sports fish and game resource (e.g. trout, salmon, and mallard ducks) locally. The National Council is formed of one nominated councillor from each region. It co-ordinates activity and provides statutory advice to the Minister.
- 12 Fish and Game supports an associated spend of between \$113 million - \$138.6 million per annum from hunter and angler activity. This contributes an estimated \$66.2 million–\$81.2 million in total value added (Gross Domestic

Product), as well as supporting wellbeing and tourism, and enhancing our environment by ensuring adequate habitat for sports fish and game birds.

There is a clear need to improve Fish and Game's efficiency and effectiveness

- 13 Fish and Game are not operating or governing the fish and game resource as well as they could be, resulting in sub-optimal outcomes for licence holders. Several independent reviews and audits have found that the organisation is dysfunctional and that the legislative settings are no longer fit for purpose.
- 14 There are examples of good practice and well-functioning councils. However, reviews generally conclude that Fish and Game councils have poor decision-making, governance and accountability practices (including behaviours), leading to unnecessary discord with other resource users (such as farmers).
- 15 There are more Fish and Game councillors than there are members of Parliament, often lacking governance expertise. Many licence holders are disengaged or completely excluded from what should be a 'user pays, user says' system (only four percent of eligible licence holders voted in the last election). Few, therefore, hold Fish and Game to account for their decision-making, performance and professionalism.
- 16 Licence holders and others perceive a single entity, but the legislation provides for an autonomous and federated structure. The National Council has a co-ordinating role but no teeth to fully enable this. Councils can therefore undermine each other and the organisation, while good practice is not always replicated. Revenue is wasted in duplicating common activities and skilled staff, or sits idle in individual council reserves due to perverse incentives created by current the revenue collection and allocation method.
- 17 Although Fish and Game has statutory responsibility, a clear picture of the state of the resources they manage is not easy to see. Legislative settings mean that there is no common approach to monitoring or compliance, making it difficult to build a comparable and credible national picture of the hunting and fishing resource. This further undermines ability to assess if revenue is going where it is needed to support higher need or activity levels.
- 18 This undermines confidence in Fish and Game's ability to deliver on its regulatory role and puts the future of the organisation in question.

Proposals to streamline operations

- 19 Fish and Game are making some positive changes in response to the 2021 governance review.¹ However, as the review acknowledged, tackling the problems effectively requires legislative change.

¹ Clark, B. and Mills, J. 2021. Review of the governance of Fish and Game New Zealand and the regional Fish and Game councils. https://www.beehive.govt.nz/sites/default/files/2021-04/FINAL%20Report%20-%20Review%20of%20Fish%20and%20Game%20New%20Zealand%202020_0.pdf

- 20 I do not intend to change Fish and Game's purpose or mandate, nor force a reduction in the number of Fish and Game regions.²
- 21 My broad intent is to:
- 21.1 maintain regional decision making over local matters, which is the cornerstone of the organisation, by focusing local knowledge and resource on improving hunting and fishing opportunities for their region
 - 21.2 no longer require individual regional councils to spend time on some administrative activities, where they are more effectively done by the National Council
 - 21.3 strengthen the leadership role of the National Council to set clear, coherent direction, collect the licence fee, and disperse it so it better supports the core functions of the organisation, including getting funds to where they are needed to support angler and hunter activity
 - 21.4 improve the 'user pays, user says' system and how Fish and Game make decisions, including how it considers non-hunting and fishing interests in decision-making
 - 21.5 strengthen checks and balances to improve accountabilities and transparency and provide adequate backstops so that the responsible Minister can intervene as necessary in exceptional circumstances
 - 21.6 more generally modernise the organisation in line with other entities to support further efficiencies and effectiveness.
- 22 I seek agreement to a package of proposals (at **Appendix One**) which will support this intent. The key proposals are outlined below.

Creating a stand-alone Fish and Game Act

- 23 I intend to create a stand-alone Fish and Game Act to separate out Fish and Game's functions from where they primarily sit in the Conservation Act.³ This will not change their current functions or responsibilities under the Act. This would be similar to the Game Animal Council Act 2013.
- 24 A stand-alone Act will recognise Fish and Game's role as a key organisation in the hunting and fishing sector, raising its profile. This should in turn support improved practices and professionalism with greater scrutiny that comes from such recognition.
- 25 DOC will work with PCO and the Legislative Design and Advisory Committee (LDAC) on the stand-alone Act and any other matters contained in this paper.

² The 2021 review of Fish and Game governance recommended reducing the Fish and Game regions to six as the main mechanism to improve efficiencies and effectiveness.

³ Other legislation relating to sports fishing and game bird hunting is spread across 15 other pieces of both primary and secondary legislation.

Shifting functions between regional councils and the National Council

- 26 Licence holders perceive a single entity: what one council does can undermine the credibility of the organisation, yet good practice regionally is not always replicated nationally. Fish and Game's federated structure does not support cohesiveness, and regional councils create their own policies which duplicate roles, and salaries. The National Council can only provide a co-ordinating function, but their direction can be rejected by regional councils. This means unnecessary variation across the organisation, and poor use of licence payer revenue.
- 27 Fish and Game's core function is to manage hunting and fishing resources effectively. However, different approaches to monitoring can make it difficult to build a true national picture. Variation in the approach to compliance and enforcement creates confusion for licence holders and opens up legal risks. A single region's decision to pursue a court case can set unhelpful precedents or damage the organisation's reputation as a whole.
- 28 Regional councils need to focus on delivering value at place, and the national Council on unifying the organisation to enable this. I want to ensure local decision making is maintained where appropriate. However, the approach taken across councils needs to be consistent and provide for coherence.
- 29 I propose to enable the National Council to:
- 29.1 set national binding policies, in consultation with regional councils, for specific activities. These binding policies, as appropriate, will either:
 - 29.1.1 provide for regional flexibility by setting minimum activity levels for some activities; and/or
 - 29.1.2 provide parameters, for some activities, for carrying out activities with optionality to adapt to region specific needs, for example for monitoring, compliance and advocacy; or
 - 29.1.3 provide a unified way of doing things, for example health and safety or human resources policies.
- 30 To acknowledge the significance of this shift and to ensure that the national Council makes decisions in the interests of both its regional councils and the organisation, I propose to:
- 30.1 Specify that the National Council is made up of regional council chairs. This will build trust and support a stronger connection between national and regional levels.

Financial Settings

- 31 Although licences are valid nationwide, revenue from licence sales is collected regionally, usually where the purchaser buys their licence. Fish and Game levy a portion of revenue for the National Council's purposes and to reallocate across regions which creates double and triple handling.

- 32 Not only is this inefficient, but revenue does not always follow activity or need. The licence holder may buy their licence in Auckland, but fish in the Ashburton River and hunt in the Waikato. Fish and Game also notes that fishing activity has been trending southward, but revenue is not following.
- 33 The system incentivises under-forecasting of licence sales so regions can hold onto 'their money', an approach which works against the organisation. This has resulted in \$2 million, over 11 years, sitting idle in regional council reserves when it could be used to improve opportunities for licence holders.
- 34 I propose to shift to the National Council the ability to:
- 34.1 collect and issue licences for the organisation and allocate revenue across regional councils and themselves. To guide the use of this revenue I propose to;
 - 34.1.1 make the National Council responsible for developing, in consultation with regional councils, a financial strategy to support funding allocation decisions
 - 34.1.2 develop a funding allocation model that will have flexibility and can be adjusted if needed. The model will set parameters for allocation to:
 - 34.1.2.1 apply to licence fee revenue only
 - 34.1.2.2 provide a method for allocating revenue, in collaboration with Fish and Game, that would balance the needs of the organisation across regional activity levels; key functions (e.g. compliance, monitoring, reporting and planning, and council); and contestable funding.

Improving the 'user pays, user says' system and decision making

- 35 Fish and Game councillors are volunteers, passionate about their sport and with good local knowledge, but there are too many governors to be effective, and they may not have the necessary governance skills or experience for the role. Nor are they representative of the membership. Only 4.2 percent of all licence holders voted in the 2024 elections.
- 36 Fish and Game's mandate to maximise hunting and fishing interests can have negative consequences for non-hunting and fishing interests, including farming, aviation safety and highly threatened native species. This impacts the organisation's reputation with key stakeholders.
- 37 I intend to shore up the democratic 'user-pays, user-says' Fish and Game model, and improve decision making, standards and professionalism by:
- 37.1 reducing the number of councillors in each council to eight; extending the eligibility to both vote and stand for election to all licence holders, and requiring an 'opt-out' electoral roll;

- 37.2 expanding (to all decision making) and strengthening Fish and Game's need to have regard to the interest of non-hunters and anglers.

Increasing transparency and improving checks and balances

- 38 There is currently no easy way to measure Fish and Game's performance or for the responsible Minister to respond to complaints of poor behaviour.
- 39 To improve accountability and ensure the responsible Minister is equipped to step in where Fish and Game is unable to resolve matters internally, I propose measures to:
- 39.1 enable the Minister to appoint up to two councillors to regional councils, with voting rights; and to have an explicit power to review Fish and Game at any time
- 39.2 expand the provision to remove councillors for "just cause"
- 39.3 requiring appropriate fit and proper person test and universally applied codes of conduct
- 39.4 require the National Council to collate all Fish and Game annual reports and include a summary of Fish and Game's overall performance. And determine that all councils must provide operational work programmes, including proposed outcomes and measurements.

Modernising the system and removing red tape

- 40 I intend to make a number of other smaller changes that would modernise Fish and Game in line with other entities, underpin the 'user pays, user says' system, and provide for further savings and accountabilities. This will improve engagement of and outcomes for licence holders, and cut unnecessary red tape to support economic growth.

Delegating authority to make other minor and technical changes

- 41 The changes I have described above, and others in support of them, are set out more fully at **Appendix One**.
- 42 I also seek agreement for Cabinet to delegate decision-making authority to me to make other minor and technical changes in line with my overall policy intent to support the drafting process.

Implementation

- 43 I propose to provide for a transition period of up to three years from Royal Ascent, to allow for a smooth change process. I expect that the incoming Chief Executive of Fish and Game will be instrumental in driving culture change and supporting increased capability to implement my proposals.
- 44 Following this transition period, I expect improvements generated by these proposals will be captured in Fish and Game's compiled annual report.

Cost-of-living Implications

- 45 Improving the efficiency and effectiveness of Fish and Game's governance and operation is likely to result in better value for money for licence holders. This may encourage greater retention of and/or growth in Fish and Game licence holder levels.
- 46 These benefits may flow through to the tourism sector, supporting New Zealand's GDP, job opportunities, and businesses.

Financial Implications

- 47 There are no financial implications for the Crown associated with these proposals.
- 48 The Conservation Act 1987 enables Fish and Game to gather licence fees to manage the sports fish and game bird resource on behalf of the Crown.⁴ Fish and Game may also receive other forms of revenue to manage the resource (e.g. interest, contracts, donations, prosecutions, central and local government funding).
- 49 Any future proposals to remunerate Fish and Game councillors or Ministerial Appointees would be made in accordance with the Cabinet Fees Framework and be funded by Fish and Game's licence fee revenue.

Legislative Implications

- 50 Primary Legislation is required to implement my proposals:
- 50.1 The Fish and Game Governance and Organisational Improvements Amendment Bill bid has been given a category 5 priority in the 2025 Legislation Programme (referred to select committee in 2025).

- 50.2 The timeline associated with this Bill is:

Date requested for introduction of the Bill	October 2025
Date of report back from select committee	March 2026
Date of enactment	June 2026
Date of commencement	July 2026

- 50.3 The Bill will include an enabling provision to allow a funding allocation model to be developed through secondary legislation.
- 51 The proposed Bill will not be binding on the Crown.

⁴ Section 26Q(1)(d) of the Conservation Act 1987.

Impact Analysis

Regulatory Impact Statement

52 TBC

Climate Implications of Policy Assessment

- 53 The Climate Implications of Policy Assessment (CIPA) team has been consulted and confirms that the CIPA requirements do not apply to this proposal as the threshold for significance is not met.

Population Implications

- 54 The policy proposals in this paper are not expected to have significant population impacts. They should be broadly supportive of licence holder interests.

Comment on specific population group implications

- 55 I understand that 20 post-settlement governance entities have a statutory relationship or arrangement with Fish and Game specifies in their settlement act or deed. My proposals do not intend to impact these relationships or arrangements. For example, Ngāi Tahu's role as a statutory advisor to all South Island regional Fish and Game councils on matters relating to native game birds.
- 56 My proposal to strengthen the requirement for Fish and Game to have regard to non-hunting interests will better manage the impact on other resources and users of the habitat. For example, farming, aviation, conservation, and iwi and hapū interests will require more active consideration in Fish and Game decision-making.
- 57 My proposal to expand the eligibility to both vote and stand for election, and the opportunity for Ministerial appointments may support greater participation by a more diverse range of perspectives in Fish and Game governance. For example, women, lower socio-economic groups, and iwi and hapū may benefit from these proposals.

Human Rights

- 58 The proposals in this paper are consistent with the New Zealand Bill of Rights Act 1990 and the Human Rights Act 1993.

Use of External Resources

- 59 A policy contractor was engaged to support the development of policy. The contractor was engaged for four months. External resource was required to temporarily backfill vacancies and provide continuity to meet timeframes. Further external resource is not expected to be required.

Consultation

Agency consultation

- 60 The following Agencies were consulted in the preparation of this Cabinet Paper: *TBC: The Treasury, Ministry of Justice, Ministry of Primary Industries, Ministry of Foreign Affairs and Trade, Public Service Commission, Māori Crown Relations – Te Arawhiti, Ministry of Māori Development – Te Puni Kōkiri, Ministry for the Environment, Department of the Prime Minister and Cabinet, Department of Internal Affairs, and Ministry of Business, Innovation, and Employment.*

Engagement with interest groups outside of central government

- 61 My predecessor, Hon Todd McClay, and I have informally engaged with all 13 Fish and Game councils and specific post-settlement governance entities (PSGEs) to inform next steps. The Department of Conservation supported some further informal engagement with a wider group of iwi and hapū through their existing relationship channels.
- 62 Engagement sought views on how to improve Fish and Game's governance and operations generally rather than on specific policy proposals. Broadly, Fish and Game appear supportive of change to generate efficiencies and effectiveness, but views on how to create this change vary. This more recent engagement built upon the extensive engagement undertaken as part of the Governance Review in 2021.
- 63 Stakeholders and Treaty partners will have an opportunity to provide views on the policies in this paper and contribute during the select committee consideration of the bill.

Communications

- 64 Following Cabinet approval, I intend to make a public announcement and media statement about the policies that will be proposed through the Bill.

Proactive Release

- 65 As soon as practicable after decisions being confirmed by Cabinet and public announcements made, I intend to proactively release this paper, subject to redactions as appropriate under the Official Information Act 1982.

Recommendations

The Minister for Hunting and Fishing recommends that the Committee:

- 1 **Note** that Fish and Game have a statutory role for the management of recreational sports fish and game bird species.

- 2 **Note** I intend to progress legislative change to support Fish and Game to be a more trusted, accountable, and cohesive organisation that provides value for money for its licence holders.
- 3 **Note** that legislative changes will contribute towards tackling the cost-of-living challenges and support tourism and economic activity in our regions.
- 4 **Agree** to create a stand-alone Fish and Game Act, similar to the Game Animal Council Act, to raise the profile of the organisation, noting DOC will work with LDAC on this and any other matter contained in this paper.
- 5 **Agree** to a package of proposals, to be drafted into legislation, that improve Fish and Game's efficiency and effectiveness and value-for-money for licence holders, with the overall intention to:
 - 5.1 maintain regional decision making over local matters, which is the cornerstone of the organisation, by focusing local knowledge and resource on improving hunting and fishing opportunities for their region
 - 5.2 no longer require individual regional councils to spend time on some administrative activities, where they are more effectively done by the National Council
 - 5.3 strengthen the leadership role of the National Council to set clear, coherent direction, collect the licence fee, and disperse it so it better supports the core functions of the organisation, including getting funds to where they are needed to support angler and hunter activity
 - 5.4 improve the 'user pays, user says' system and how Fish and Game make decisions, including how it considers non-hunting and fishing interests in decision-making
 - 5.5 strengthen checks and balances to improve accountabilities and transparency and provide adequate backstops so that the responsible Minister can intervene as necessary in exceptional circumstances
 - 5.6 more generally modernise the organisation in line with other entities to support further efficiencies and effectiveness.
- 6 **Agree** to the proposals at **Appendix One**.
- 7 **Agree** to delegate authority to the Minister of Hunting and Fishing to approve other necessary minor and technical changes within the overall policy intent I have described in this paper.
- 8 **Note** that the Fish and Game Governance and Organisational Improvements Amendment Bill bid is a category five priority (referred to select committee in 2025) for the 2025 Legislative Programme.

Authorised for lodgement

IN C O N F I D E N C E

Hon James Meager

Minister for Hunting and Fishing

DRAFT

IN C O N F I D E N C E

Appendix One – Schedule of Legislative Amendments

Key to abbreviations used in table:

NZC = New Zealand Fish and Game Council; **FGC** = Fish and Game Council; **CA** = Conservation Act 1987; **FFR** = Freshwater Fisheries Regulations 1983; **FGCER** = Fish and Game Council Elections Regulations 1990; **SFGMP** = sports fish and game management plan; **WA** = Wildlife Act 1953; **WR** = Wildlife Regulations 1955; **TFR** = Taupo Fishery Regulations 2004

No.	Summary of problem	Summary of remedy
	Functions	
	Nationwide policy consistency	
1.	<i>General</i> NZC is responsible for coordinating the work of FGCs but has no function to develop policies for the work of FGCs. This impedes national coordination of work by FGCs.	The NZC to have the ability to develop national policies for the work of Fish and Game, both NZC and FGCs. These would be non-binding (except for certain specified areas (described below)) to maintain the independence of FGCs in their regional work.
2.	<i>Compliance</i> Each FGC can decide its own policy for ensuring compliance with hunting and fishing regulations. This creates inconsistency of treatment across different regions, and raises questions about natural justice.	<p>To create consistency of approach across councils, the NZC, in consultation with FGCs, to set policy binding on FGCs for things such as:</p> <ul style="list-style-type: none"> • How compliance activity is conducted (e.g., standards of behaviour and approach) • How compliance activity is reported • Spatial coverage of compliance work • How to apply any approved infringement policy in different circumstances (the Minister to continue to approve any infringement policy as set out in s.26HA(2) of CA). <p>The NZC, in consultation with FGCs, to set the minimum levels of compliance work undertaken by FGCs for this key activity.</p>

3.	<p><i>Monitoring</i></p> <p>Each FGC can decide its own policy for resource and activity monitoring in its region, sometimes resulting in incomplete or inconsistent national-level data. This impedes national coordination and prioritisation of effort.</p>	<p>To create consistency of approach for monitoring activity (as set out in s.26Q(1)(a) of the CA) the NZC, in consultation with FGCs, to set policy binding on FGCs for things such as:</p> <ul style="list-style-type: none"> • Standardised methodologies for conducting monitoring activity – including monitoring of sports fish and game resources, licence holder activity and satisfaction, and habitat condition • Spatial coverage of different types of monitoring • Standardised reporting of data. <p>The NZC, in consultation with FGCs, to set the minimum levels of monitoring work undertaken by FGCs for this key activity.</p>
4.	<p><i>Corporate</i></p> <p>Each FGC sets its own corporate, business, and personnel policies and processes, leading to duplication of effort and inconsistent standards and staff salaries across regions.</p>	<p>To create consistency of approach and systems for corporate activity, the NZC, in consultation with FGCs, to set policy binding on FGCs for things such as:</p> <ul style="list-style-type: none"> • Business processes and systems • Corporate policies • Health and safety (minimum standards) • Personnel policies (including staff conditions). <p>This will ensure consistency of approach across the organisation, providing greater efficiencies, and enabling better planning and staff management.</p>
5.	<p><i>Advocacy</i></p> <p>Some FGC advocacy work and court action has been contrary to wider Fish and Game interests, but the NZC has no way to intervene.</p>	<p>To create consistency of approach across councils and protect the interests of Fish and Game as a whole, the NZC, in consultation with FGCs, to set policy binding on FGCs for things such as:</p>

IN CONFIDENCE

		<ul style="list-style-type: none"> • General advocacy undertaken by FGCs to advance the interests and aspirations of anglers and hunters (including, potentially, a national advocacy strategy) • Advocacy undertaken by FGCs via statutory planning processes to advance the interests and aspirations of anglers and hunters • FGC appearances before courts and tribunals. <p>To ensure court action is timely but well considered, FGC court action to be subject to the direction of the NZC, except when the FGC is challenging the NZC or another FGC.</p> <p>NZC to be empowered to intervene in local advocacy actions undertaken by FGCs when such actions are contrary to the agreed-upon binding advocacy policy.</p>
6.	<p><i>Sports Fish and Game Management Plans</i></p> <p>NZC has no ability to determine policy content of sports fish and game management plans (SFGMPS) in the areas where the NZC can set policy binding on FGCs (see above).</p>	<p>To create consistency of approach across councils, the NZC, in consultation with FGCs, to determine minimum provisions for inclusion in draft SFGMPs prepared by FGCs in relation to:</p> <ul style="list-style-type: none"> • compliance and enforcement • monitoring of resources, and licence holder activity and satisfaction • statutory planning processes.
	Functional support	
7.	<p><i>NZC Work Plan</i></p> <p>The NZC is to have new operational functions and responsibilities, and appropriate transparency and accountability is needed.</p>	<p>The NZC to be required to prepare an annual operational work plan (as FGCs do currently). This will deliver transparency and accountability by providing outcomes and measures to report against (see also rows below).</p>

IN CONFIDENCE

IN CONFIDENCE

8.	<i>Specialist staff</i> The small size of many FGCs often prevents the engagement of specialist staff, and sharing staff between regions is administratively difficult.	The NZC to have a new function to provide specialist expertise to FGCs – such as planners, ecologists, scientists, lawyers, accountants, etc – who can work across several regions. Such staff may be located in the regions they work.
9.	<i>Servicing and reporting</i> The servicing of councillors and business planning and performance reporting need to receive adequate attention and support.	<p>The NZC to have a new function to determine, in consultation with FGCs, minimum work programmes to be implemented by FGCs in relation to the key activities of:</p> <ul style="list-style-type: none"> • the servicing of FGC meetings and support to councillors • annual business planning and performance monitoring. <p>The NZC to have a responsibility to ensure that FGC minimum work programmes for all key activities (including rows 2 and 3 above) are adequately funded.</p>
10.	<i>Templates</i> Each FGC may decide its own structure and format for work planning, annual reporting, and SFGMPs, which can lead to inconsistencies across councils and make comparisons difficult.	The NZC to have a new function to determine the forms and templates to be used by FGCs in all work planning, performance reporting, and SFGMPs.
Issuing of licences		
11.	FGCs currently issue all licences, and collect all revenue, requiring multiple handling of money via inefficient redistribution mechanisms.	<p>The NZC to issue all sports fishing and game hunting licences and receive all fee revenue.</p> <p>Licences are currently sold via a central website – licence holders buy directly from website, and licence sales agents sell via a portal to this website. This method of selling licences would continue. The website is operated by a specialist contractor.</p> <p>To maintain clarity, rename “Special licences” as “Special permits” in FFR.</p>

IN CONFIDENCE

	Allocation of funding	
12.	<p>Allocation of funding (derived from licence fee revenue) among FGCs has been problematic since licences issued by FGCs became valid nationwide.</p> <p>Annual allocation of funding to each FGC (after redistribution by NZC) is based largely on the level of funding received by each FGC in previous years. This means management effort is not always directed to areas of greatest potential benefit to licence holders.</p>	<p>Allocation of funding among FGCs to be determined by the NZC according to a funding model set in secondary legislation (<i>regulations or Gazette to be determined</i>).</p> <p>The funding model (yet to be fully developed) is expected to direct the bulk of funding to FGC regions in proportion to the level of licence holder activity in each region, while ensuring funding for key activities (see above), national research, and NZC work, and include a contestable fund.</p> <p>The NZC to have a new function to develop, in consultation with FGCs, a financial strategy.</p>
	Transparency and reporting	
	Performance reporting	
13.	<p><i>Performance measures</i></p> <p>Operational work planning lacks accountability and transparency, and is not aligned with existing annual reporting requirements for Fish and Game</p>	<p>NZC and FGC annual operational work plans to be required to include:</p> <ul style="list-style-type: none"> • A concise explanation of what each class of outputs is intended to achieve • A concise explanation of how the performance of each class of outputs will be assessed. <p>NZC and FGC annual operational work plans to be considered final once dated and signed by the Chair and the Manager of the respective FGC or NZC.</p> <p>NZC and FGC annual operational work plans must be consistent with any approved SFGMP and any binding policy set by the NZC.</p>

IN CONFIDENCE

IN CONFIDENCE

14.	<i>Report against performance</i> NZC and FGC annual reporting in CA does not align with NZC and FGC requirements specified in Public Finance Act 1989 and Crown Entities Act 2004.	NZC and FGC annual reports to each contain statements of performance against the performance expectations in their annual operating plan. Each FGC annual report to be dated and signed by the FGC Chair and FGC Manager before submission to NZC.
15.	<i>Full reporting on enforcement</i> FGCs must report annually on enforcement activity under an infringements system, but not on actions leading to court action (complaints from public, adherence to procedures, etc)	Requirements on FGCs to report annually on enforcement work under any infringement system to be expanded to cover all enforcement work.
16.	<i>Combined annual report</i> NZC and each FGC is independent and provides its own separate annual report to Minister, none of which are reviewed individually, or across Fish and Game as a whole. (For example, there is no equivalent to the annual select committee reviews of Crown agencies.)	The NZC to compile NZC and FGC annual reports (currently 13 in all) into a single annual report for the Minister to present to the House. The NZC combined annual report be required to: <ul style="list-style-type: none"> • Contain the statements of performance against performance expectations for the NZC and each FGC (as provided by each FGC); and • Summarise any discrepancies between the performance and performance expectations of the NZC and each FGC; and • Provide an overall review of Fish and Game (all 13 councils) as a whole. The NZC combined annual report to be dated and signed by the NZC Chair and NZC Manager before submission to the Minister.
17.	<i>Information to enable coordination</i> The NZC has been hindered in its coordination role by FGCs declining to provide information necessary for coordination	The NZC to have a clear oversight function and a new power to require Fish and Game Councils to provide information on request (for the functions where the NZC sets binding policy) related to: <ul style="list-style-type: none"> • financial information

IN CONFIDENCE

	<p>and oversight of Fish and Game work. FGCs have not been fully informed of NZC activities.</p>	<ul style="list-style-type: none"> • performance reporting information • compliance information (including actions of enforcement officers) • monitoring information and data • matters relating to adherence with corporate policies, including personnel policies (subject to Privacy Act considerations for staff employed by the FGC rather than the NZC). <p>FGCs to have a power to require the NZC to provide information on request (for the functions where the NZC sets binding policy) related to:</p> <ul style="list-style-type: none"> • financial information • performance reporting information • compliance information (including actions of enforcement officers) • monitoring information and data • matters relating to adherence with corporate policies, including personnel policies (subject to Privacy Act considerations for staff employed by the FGC rather than the NZC) • matters relating to the development by the NZC of binding policies.
18.	<p><i>Information to inform audits</i></p> <p>NZC has a function to audit the activities of FGCs but lacks the necessary power to require FGCs to provide financial information to NZC, thus preventing NZC fulfilling its role.</p>	<p>The NZC to have a function to audit the activities and performance of FGCs, and of Fish and Game as a whole.</p> <p>An FGC must provide any information (including financial, performance, or other information on its activities, assets or liabilities) that is requested by the NZC as part of an audit.</p>

IN CONFIDENCE

	Reporting to DOC	
19.	DOC is not always aware of circumstances and results of legal proceedings under CA, despite having accountability for operation of Act	NZC and FGCs to be required to report to DOC on circumstances and results of all legal proceedings made under the CA, as is currently required under WA.
	Modernising Fish and Game	
20.	<i>Communication with licence holders</i> Fish and Game can have difficulty communicating with licence holders on matters of interest, including consultation on proposed Anglers and Game Notice conditions, and advising of SFGMP reviews.	Provide that, in addition to newspapers, Fish and Game may place public notices and consult with licence holders via electronic methods, Internet sites (with free public access) and by emailing eligible voters (who have provided an email address when buying a licence) or other electronic notification (e.g. subscription via website).
21.	<i>Online meetings</i> There is uncertainty about legality of NZC and FGC meetings held online.	Allow NZC and FGC meetings to be held online, and votes taken (including electronically), as if meeting was in person.
22.	<i>Role clarity</i> There has been uncertainty within Fish and Game about the NZC's role in processes for approvals of SFGMPs, Anglers Notices, and Open Season for Game Notices. Anglers Notices and Game Notices are becoming unnecessarily complex and different between regions, but there is also a need to maintain FGC independence over local resource management decisions.	NZC to collate and edit (form, readability and useability only) Anglers and Game Notices before submitting them to the Minister for approval. NZC may provide independent advice to the Minister on the sustainability (e.g. will the resource become depleted), suitability (e.g. is there a good rationale for a particular condition), and consistency (within and between regions) of Anglers and Game notice conditions recommended to the Minister by FGCs. However, the NZC will not be able to amend or decline the substance of Anglers and Game notices prepared by FGCs before submission to Minister. NZC may provide independent advice to the Minister on the suitability of provisions in draft SFGMPs submitted to the Minister for approval by FGCs.
	Ministerial powers	

IN CONFIDENCE

23.	<i>Review function</i> Minister has no explicit function to review the operations or performance of FGCs and NZC	Minister to have a function to review operations and performance of Fish and Game as a whole, or individual FGCs or the NZC at any time. NZC and FGC to be required to provide any information requested by the Minister as part of a review, including any financial, performance, or other information on their activities, assets, or liabilities.
24.	<i>Anglers Notice amendment</i> Minister cannot amend an Anglers Notice before approving it – unlike for a Game Notice where the Minister can amend before approving	Minister to be able to either approve a draft Anglers Notice or amend the draft notice before approving.
25.	<i>Game Notice amendment</i> Minister cannot amend an approved Game Notice until after season begins.	Minister to be able to amend an approved Game Notice before or during the Open Season that it relates to.
Governance		
Eligibility to vote in elections		
26.	<i>Everyone may vote</i> Only adult whole-season licence holders may currently vote; this excludes many licence holder interests. Licence holders must also ask to be listed on the electoral roll, creating an impediment to future participation in elections.	All New Zealand residents who have held an adult sports fishing or game bird hunting licence in the three years leading up to a Fish and Game election to be eligible to vote in that election. Buyers of licences to be automatically included on electoral roll, rather than needing to ask to be on roll. The partner of the holder of a family whole-season licence to be able to vote in FGC elections.
27.	<i>One vote only</i> Licence holders currently vote in the regions they buy their whole-season licence(s) from, and if they buy their fishing	Licence buyers to be required to select a voting region for election purposes when buying a licence, and no longer able to vote in two regions.

IN CONFIDENCE

	and hunting licences in different regions, they may vote in elections for two regions.	Where a person purchases more than one licence to hunt or fish in the three years before an election, the FGC region specified at the time the most recent licence was purchased shall be the region they are entitled to vote in. Where a region is to be divided at the time of an election (as part of a reorganisation of regions and boundaries), the NZC must ask eligible voters for that region which new region they wish to vote in.
28.	<i>No subregions</i> The current subregions do not deliver local representation as voters vote for candidates in all subregions and a candidate can stand anywhere.	Remove provisions for Fish and Game regions to have subregions.
29.	<i>Electoral roll maintenance</i> FGCs must maintain electoral rolls, but in practice this has long been done centrally	NZC to maintain electoral rolls rather than FGCs.
	Elections procedures	
30.	<i>Allow electronic voting</i> The CA provides for electronic (online) voting, but the FGCER do not. The requirement for alphabetical listings on ballot papers favours candidates with surnames earlier in alphabet, affecting election outcomes.	Electronic voting to be provided for in regulations. Voting papers able to be provided via email and Internet links, in addition to via post. Remove requirement for election candidates to be listed alphabetically by surname on ballot papers.
31.	<i>Publicity for elections and rolls</i> Elections and results currently advertised only via newspapers. Personal contact details are currently publicly available via electoral roll.	Elections and election results to be advertised also via electronic methods, Internet sites (with free public access), and by emailing eligible voters (who have provided an email address when buying a licence) or other electronic notification (e.g. subscription via website).

IN CONFIDENCE

		Align voter privacy with modern expectations and privacy principles by making elector contact details (postal and email addresses) included on electoral roll no longer publicly available.
32.	<i>Keeping elections aligned</i> The discharge of a FGC would currently result in that FGC having future elections at different times to all other FGC elections	FGC election timing to be kept aligned across all regions in the event of a council being discharged by Minister. A council elected to replace a discharged council to hold office only until the next three-yearly elections (unless this would result in a term of less than 1 year, in which case the term shall be until the end of the term and for an additional 3 years.
	NZ Council membership	
33.	NZC will have increased functions and responsibilities. FGCs may replace their NZC representative at any time, which leads to NZC members focusing on maximising benefits for their FGC, not all licence holders nationally. NZC may replace its Chair at any time for any reason, creating policy continuity risks.	The NZC to be comprised of the Chairs of the FGCs, in recognition of the additional roles and responsibilities. To deter FGCs changing their NZC representative frequently (creating policy and governance continuity difficulties): <ul style="list-style-type: none"> • If a FGC replaces its Chair, the FGC must advise the NZC and Minister in writing of that replacement and the reasons for that replacement • If the NZC replaces its chair, the NZC must advise the Minister in writing of that replacement and the reasons for that replacement. The NZC and FGCs to appoint their own Chairs as currently.
	FGC membership	
34.	<i>Council size</i> The current size of 12 councillors per FGC is too large given the level of decision making required.	Each FGC to have up to eight elected members (not including co-opted or appointed members).

IN CONFIDENCE

35.	<p><i>Include wider interests</i> Criteria for FGC membership are too narrow, and exclude many anglers and hunters from being councillors (and exclude the interests they might represent)</p>	<p>Any resident adult who has held a sports fishing or game bird hunting licence in the three years prior to an election to be eligible for election to a FGC.</p>
36.	<p><i>Updated "fit and proper person" test</i> Current criteria whereby people are deemed unsuitable to hold FGC membership are too narrow – convictions for offences involving firearms, freshwater habitat, or any freshwater fish are as relevant as existing matters; matters from s.30 of Crown Entities Act 2004 are also relevant.</p>	<p>A person is to be not eligible to stand for election to a FGC (or remain a councillor if in office) if they:</p> <ul style="list-style-type: none"> • Are an undischarged bankrupt • Have been convicted of an offence involving freshwater fish, or game, or protected wildlife, or freshwater habitat, or the use of firearms (whether an offence under the CA or any other Act) • Have been convicted of an offence punishable by imprisonment for a term of 2 years or more, or who has been sentenced to imprisonment for any other offence, unless that person has obtained a pardon, served the sentence, or otherwise suffered the penalty imposed on the person • Are disqualified under another Act. <p>MoJ Criminal record check and public register check to be required of all election candidates to confirm eligibility prior to election (paid for by the FGC and facilitated by returning officer). Candidates to also sign a statement to that effect.</p> <p>(Note that committing an <u>infringement</u> offence would not prevent someone from standing for election.)</p>
37.	<p><i>Councillors not to be employees</i> Allowing people to be both councillors and employees can create accountability problems</p>	<p>No FGC or NZC councillor to be able to be an FGC or NZC employee while the councillor is in office.</p>

IN CONFIDENCE

IN CONFIDENCE

38.	<i>Avoiding immediate re-election</i> If a person is removed from a FGC by the Minister there is nothing preventing them being immediately re-elected to office.	If an elected councillor has been removed from office by the Minister, that person is to be ineligible to be a FGC member for a period of three years from the date of removal (i.e a full term stand-down).
39.	<i>Declaration of previous removal</i> If a person has previously been removed from office by the Minister, there is no requirement for electors to be advised of this.	If an elected councillor has previously been removed from office by the Minister (for any reason) and that person stands again for election, they must advise electors of the previous removal.
40.	<i>Remedying skills gaps</i> Elected FGCs sometimes lack the full range of skills required for good decision-making	Minister may appoint up to two members (additional to elected members) onto a FGC. Such appointed members to be entitled to vote on any matter, but may not be elected as the FGC chair by the council members.
41.	<i>Transparency of resignation</i> Any FGC member may resign by writing to Minister only, and NZC may not be immediately aware of situation and potential issues.	Any member of a FGC may at any time resign from a FGC by writing addressed to the Minister, signed and dated, with a copy to the FGC and NZC.
42.	<i>Non-democratic process to fill vacancies</i> Process for replacing elected FGC members who resign is not democratic.	At any election, all vacant positions must be filled unless there are fewer eligible candidates standing than vacancies. A FGC can choose to fill a vacancy or vacancies, or not, by election at any time during its term if the number of its members is below eight but at or above a minimum of three. A FGC must hold an election to fill all vacant positions if FGC membership falls below the minimum number of three members.
43.	<i>Member of multiple FGCs</i> It is possible for someone to being elected as a member of two FGCs at the same time, and potentially the chair of both leading to potential uncertainty about NZC voting rights.	Fish and Game councillors to be prohibited from serving on more than one Fish and Game Council at the same time.

IN CONFIDENCE

IN CONFIDENCE

	Behaviour while in office	
44.	<i>Removal of councillor for "just cause"</i> Circumstances under which Minister may remove a councillor from office are outdated and not aligned with similar legislation	The Minister to be able to remove any member of a FGC from office at any time for any "just cause", including misconduct, inability to perform the functions of office, neglect of duty, and breach of any of the collective duties of the FGC or NZC or the individual duties of FGC or NZC members (depending on the seriousness of the breach).
45.	<i>Standards for conduct of meetings and councillors</i> Conduct of FGC meetings and behaviour of some councillors has often been less than optimal, including in relation to conflicts of interest	<p>Ensure council meetings and councillor conduct is consistent with good public entity standards and practice, including noting and taking account of conflicts of interest, by enabling the Minister to establish by notice in the <i>Gazette</i>:</p> <ul style="list-style-type: none"> • rules for the conduct of all NZC and FGC meetings • rules for the conduct of all NZC and FGC councillors while performing their duties. <p>Compliance with these rules to be mandatory for all council meetings and councillors.</p>
	Fees and expenses	
46.	<i>Expenses</i> FGC and NZC members cannot be reimbursed for expenses.	Enable NZC and FGC councillors to be reimbursed for actual and reasonable expenses (funded from licence fee revenue) incurred in performing functions as a councillor.
47.	<i>Fees</i> FGC councillors appointed by the Minister would receive no remuneration for their services as councillors.	Enable Ministerial appointees to FGCs to be paid meeting fees in accordance with Cabinet Fees Framework (funded from licence fee revenue). Elected FGC councillors and NZC members to continue to be volunteers.
48.	<i>No compensation for loss of office</i> Remove any entitlement to compensation or payment if no longer a council member.	An NZC or FGC councillor who leaves or is removed from their position as a councillor shall cease to be paid and will not be entitled to compensation for loss of office.

IN CONFIDENCE

IN CONFIDENCE

Mergers of Fish and Game Regions		
49.	<p><i>Enable regional mergers</i></p> <p>Currently, mergers of FGC regions are not feasible as the CA does not have the provisions needed to manage assets, end councillor terms of office, etc.</p>	<p>Minister to have power to alter or merger FGC regions, and consider requests for mergers from FGCs (no change from current powers).</p> <p>When regions are merged or altered:</p> <ul style="list-style-type: none"> • The Minister to be able to allocate and transfer assets as Minister considers appropriate. • All proceedings by or against an FGC may be continued. • Land Registrars be empowered to give effect to any transfer of land. • All fishing and hunting licences and SFGMPs in respect of affected regions to continue in force until their expiry, replacement o cancellation. <p>All councillors of a region that is abolished to continue to hold office until the end of the three-year term of office and (for clarity) at the election the old council(s) and region(s) cease to exist, and new ones come into existence.</p>
50.	<p><i>Minimum number of regions</i></p> <p>Too many regional mergers could leave NZC with too few councillors, or FGCs with insufficient local knowledge</p>	<p>Number of Fish and Game regions to be no fewer than 7 and no more than 12.</p>
Needs of other interests		
51.	<p><i>Treaty partners</i></p> <p>Treaty partners sometimes wish the periodic transfer of sports fish to isolated fisheries to cease, to meet cultural objectives. Minister responsible for Fish and Game currently has no ability to prevent this.</p>	<p>The Minister to have a new power to prohibit the transfer of live sports fish to a location where the species already exists.</p>

IN CONFIDENCE

IN CONFIDENCE

52.	FGC management to maximise angler and hunter benefit often overrides the needs of other interests, and has sometimes impacted aviation safety and threatened native fish	<p>The FGC function to manage, maintain, and enhance sports fish and game resources in the recreational interests of anglers and hunters to become <u>subject to</u> the following:</p> <ul style="list-style-type: none"> • ensuring aviation safety is not compromised • ensuring the conservation of isolated populations of threatened native fish is not impeded • having regard to the impact of management on other natural resources and other users of the habitat
53.	Similar to the above, the current requirement for sports fish and game management plans (SFGMPs) to maximise angler and hunter opportunities often overrides the needs of other interests	<p>Have new requirement that SFGMPs must include provisions to:</p> <ul style="list-style-type: none"> • ensure aviation safety is not compromised • ensure the conservation of isolated populations of threatened native fish is not impeded • describe how any conflict between sports fish and game management and “other natural resources and the needs of other users of the habitat” (i.e. non-hunting interests) will be managed.
54.	<i>Require compliance with policy</i> FGCs have not always complied with their approved sports fish and game management plans and there has been no way to make them comply.	<p>Have a clear requirement that FGCs and NZC must comply with:</p> <ul style="list-style-type: none"> • any approved SFGMPs • any General Policies under conservation legislation • any binding policy determined by the NZC (applies to FGCs only).
55.	<i>Empowered to manage game</i> FGCs have a function to manage game birds but lack the powers needed to manage game birds impacting farm crops	<p>Director-General of Conservation to be able to delegate to FGCs the DG’s powers to directly manage game birds impacting crops, etc, subject to any conditions specified by the DG.</p>

IN CONFIDENCE

IN CONFIDENCE

	or aviation safety. Requiring case by case permits from DOC is impractical.	The DG would be able to revoke the delegation if an FGC used the delegation inappropriately or in ways contrary to any conditions required by the DG.
56.	<i>Enable establishment of commercial preserves</i> Authorisation of commercial upland game preserves currently requires an Order in Council, which is an unnecessary level of process.	Commercial upland game preserves to be authorised by Notice (in the same way that non-commercial preserves are authorised).
Other matters and removal of spent provisions		
57.	<i>Creation of Separate Act</i> There is a need to better recognise Fish and Game's role as a key organisation in the hunting and fishing sector.	Create a standalone Fish and Game Act, maintaining all necessary linkages with CA and other legislation (as modified by the reforms elsewhere in this schedule) but making no other changes to policy.
58.	<i>Appointment of staff</i> The CA has NZC and FGC councillors appointing all staff, not only NZC and FGC managers	Clarify that elected councillors appoint managers, and that managers appoint other staff (making current practice lawful) Appointments of managers and staff to be subject to staff policy determined by NZC (see above).
59.	<i>Use of money from court fines</i> Section 46(7A)(b) of CA largely restricts the uses of fines recovered to the operation of hatcheries.	Align with similar provisions in WA such that money from court fines under CA may be applied for purpose of any FGC functions.
60.	<i>Remedy appointment gap</i> Sections 26FA(1) and (2) of CA allows appointment for the purposes of the CA but not the Wildlife Act.	Allow appointments of enforcement officers for the purposes of WA also.
61.	<i>Update headings</i> Sections 26H and 26W of CA call NZC and FGCs "Crown Entities" when they are no longer such.	Update cross-headings to reflect current legislation (Public Entity status).

62.	<i>Remove transition provisions</i> Provisions relating to Transitional Fish and Game Council became spent over 30 years ago.	Remove spent provisions relating to transitional Fish and Game Councils from FGCER.
-----	--	---

DRAFT



Cabinet Paper Talking Points: Fish and Game New Zealand Governance and Organisational Improvements Amendment Bill

To	Minister for Hunting and Fishing		
Committee	Cabinet Economic Policy Committee		
Date of meeting	7 May 2025		
Reference	25-K-0012	DocCM	DOC-25-K-0011
Minister lead	Hunting and Fishing		
DOC Contact/s	Ruth Isaac, Deputy Director-General Policy and Regulatory Services, s(2)(a) [REDACTED] Nicola Molloy, Policy Manager Hunting, Fishing, and Economic Development, s(2)(a) [REDACTED]		
Security Level	In Confidence		

Purpose – Te aronga

1. This memo supports you taking the Cabinet paper *Fish and Game New Zealand Governance and Organisational Amendment Bill* to the Cabinet Economic Policy Committee (ECO) on 7 May.
2. You are seeking approval to issue drafting instructions for a Bill that will improve Fish and Game New Zealand's (Fish and Game's) effectiveness and provide better outcomes and value for money for licence holders.
3. This memo provides:
 - information relating to your Cabinet paper
 - talking points at Appendix 1
 - questions and answers at Appendix 2
 - copy of the Cabinet paper recommendations at Appendix 3

Proposals

4. These proposals are a priority for your Hunting and Fishing portfolio and support wider Government objectives to tackle cost of living challenges and grow economic activity.
5. The paper sets out your broad intent to:
 - maintain regional Fish and Game council decision-making over local matters, which is the cornerstone of the organisation, by focusing local knowledge and resource on improving hunting and fishing opportunities for their region
 - no longer require individual regional Fish and Game councils to spend time on some administrative activities, where they are more effectively done by the National Council

- strengthen the leadership role of the National Council to set clear, coherent direction, collect the licence fee, and disperse it so it better supports the core functions of the organisation, including getting funds to where they are needed to support angler and hunter activity
 - improve the 'user pays, user says' system and how Fish and Game make decisions, including how it considers non-hunting and fishing interests in decision-making
 - strengthen checks and balances to improve accountabilities and transparency and provide adequate backstops so that the responsible Minister can intervene as necessary in exceptional circumstances
 - more generally modernise the organisation in line with other entities to support further efficiencies and effectiveness.
6. You also propose to create a stand-alone Fish and Game Act, similar to the Game Animal Council Act 2013, to raise the profile of the organisation.

Background and context – Te horopaki

7. The Bill is a category five (referred to select committee in 2025) priority in the 2025 Legislative Programme.
8. Your current timeframes following ECO are:

Date	Activity
12 May	Cabinet
Mid-May – mid-October	PCO drafting
Late-October – May 2026	Bill introduced and referred to select committee, second reading, Committee of the Whole House, third reading
June 2026	Royal Assent

9. We understand there are a large number of other proposals across government that are on a similar trajectory.

Summary of Agency and Ministerial feedback

10. DOC received feedback from the Department of Internal Affairs, Ministry for the Environment, Ministry of Primary Industries, Office of Treaty Settlements and Takutai Moana - Te Tari Whakatau, and Ministry of Māori Development – Te Puni Kōkiri. These agencies are broadly comfortable with this paper.
11. Most comments suggested minor changes for clarity or noted support. This included support for the proposal to strengthen the requirement for Fish and Game to have regard to non-hunting interests.
12. We understand that Ministerial consultation did not raise anything significant and that there was a limited response.

Next steps – Ngā tāwhaitanga

13. Once you have Cabinet approval to begin drafting the Bill, DOC will provide you with further advice and materials to support an announcement and ongoing communications.

ENDS

Appendix 1: Talking points to support you at ECO

Why now?

- Fish and Game have statutory responsibility for managing the sports fish and game bird resource. They are funded by licence sales, not Government, and are at arms-length.
- There are about 150,000 Fish and Game licence holders. Anglers and hunters are estimated to spend between \$113 to \$138 million every year.
- This makes an important contribution to regional economies and supports tourism, wellbeing and the environment.
- However, there have been several reviews, ongoing negative media and many complaints to Ministers over the last 30 years. This has provided plenty of evidence that the legislation prevents Fish and Game from performing their statutory role effectively.
- Current legislation provides for a federated structure of 12 regional councils and a national council with a co-ordinating function and no real 'teeth'. This is not the 'single entity' people perceive.
- This has led to inconsistencies in delivering statutory functions, duplication of effort and wasteful expenditure. Individual councils can and have undermined the organisation as a whole.
- Fish and Game's current setup incentivises under-forecasting of licence sales. This has resulted in \$2 million, over 11 years, sitting idle in regional Fish and Game council reserves instead of improving opportunities for licence holders. In total, Fish and Game reserves currently amount to approximately \$8.7 million.
- Many licence holders are excluded or disengaged from what should be a 'user pays, user says' system (only 4.2 percent of eligible licence holders voted in the last election). Few, therefore, hold Fish and Game to account for their decision-making, performance, and professionalism.

- There can be 144 Fish and Game councillors (more than Parliament). But positions are not always filled. There are currently 108 councillors serving, supported by about 84 Fish and Game employees across the organisation.
- Change is long overdue. It would enable Fish and Game to provide greater value for licence payer's money. This supports cost of living challenges and could encourage more people into the sport – further boosting the positive contribution the organisation makes.

What am I proposing to do?

- Fish and Game has an important and historic role in New Zealand. I do not want to fundamentally change their model.
- Instead, I want to make changes that drive efficiency and value-for-money for licence holders, and ensure that Fish & Game perform their regulatory role – looking after fish and game stocks for the enjoyment of New Zealanders – well.
- And in doing so, I want to recognise the role Fish and Game play by providing for a stand-alone Fish and Game Act.
- Fundamentally I propose to rebalance Fish and Game functions to:
 - **Lift administrative burdens from regional Fish and Game councils** to reduce duplication and make efficiencies
 - **Strengthen the role of the national council**, to provide greater direction and coherence – but with limitations so they do not become over-inflated.
- The national council will take full responsibility for managing policies like health and safety. It will set binding minimum requirements and parameters for the core regulatory functions of compliance, monitoring and advocacy. It will employ specialists for the benefit of the organisation as a whole.
- It will also collect and distribute the national licence fee, removing current inefficient triple-handling. This will ensure revenue supports activity and need, and not sit idle in regional bank accounts.

- Regional councils will be freed up to focus on what matters: they will retain access to all the services they need, so that their local expertise can instead be fully focussed on actions to improve hunting and fishing opportunities.
- To support this shift to effective governance and decision making, I propose to:
 - Form **the National Council from the chairs of regional Fish and Game councils**
 - Make a number of **improvements to the 'user pays-user says' model**
 - **Bring governance standards in line** with similar entities and modernise the organisation.
- This will address long standing dysfunction and properly provide for democracy that underpins the organisation. For example, ensuring all licence holders can vote and be elected. Reducing total councillors from 144 to 96. Ensuring these elected councillors meet the standards for public service.
- I will also ensure Fish and Game take better account of the needs of other users and resources when making decisions, such as farmers, aviation and highly threatened native species.
- Finally, I want **to provide for greater transparency and accountability**. This includes the ability for the Minister to intervene where necessary and as a backstop measure, ensuring Fish and Game remains at arms-length.

Next steps

- I seek agreement to progress these, and other minor and technical changes to Fish and Game. These changes will provide for greater unity within the organisation and improve their ability to deliver their statutory responsibilities.
- Ultimately this will benefit the paying licence holder and better enable New Zealanders to go hunting and fishing.

Appendix 2: Questions and Answers

What is the economic impact of freshwater fishing and game bird hunting in New Zealand?

Answer	Hunting and fishing are significant recreational pastimes in our country, bolstering tourism and regional economic activity. Each year, more than 100,000 Fish and Game freshwater angling licences are sold. Domestic and international anglers collectively spend between \$113 million and \$138.6 million on their trips, generating a total output of \$96 million to \$117.7 million. This contributes \$66.2 million to \$81.2 million to the Gross Domestic Product and supports 952 to 1,168 jobs across New Zealand.
---------------	--

Why do you need a stand-alone Act? What are the implications?

Answer	The creation of a separate Fish and Game Act will better recognise the entity's key role in the hunting and fishing sector. This will support improved practices and professionalism, raising Fish and Game's profile. The stand-alone Fish and Game Act will maintain all necessary linkages with the Conservation Act and other relevant legislation, without altering Fish and Game's current functions or responsibilities.
---------------	---

What is the timeline for the Bill and for Fish and Game to implement the changes?

Answer	<p>I anticipate the Bill will be enacted mid-2026, with phased implementation of the reforms starting shortly thereafter.</p> <p>Further discussions with Fish and Game will be necessary to sequence the transition period, which I proposed to be up to three years from Royal Assent to ensure a smooth</p>
---------------	--

	change process in line with the organisation's electoral, and budget-setting cycles.
<i>Will the licence fee be cheaper? What are cost savings?</i>	
Answer	<p>This reform will not alter how licence fees are determined (which is a decision made by me on the advice of Fish and Game). However, the efficiencies created by this reform will increase value for money for licence holders. This could mean a cheaper licence in the long run, or licence money being better spent.</p> <p>Savings can be expected if fewer functions are duplicated, opportunity costs are minimised, and economies of scale are utilised.</p>
<i>Will this proposal have any costs for Government?</i>	
	<p>No. Fish and Game is funded by licence holders (approximately \$12-13m per year). My proposal to introduce a fit and proper person test would be funded by the licence fee. Any Ministerial appointments made would also be supported by the licence fee, in line with the Cabinet Fees Framework, but I envisage this measure as a backstop only, once other avenues have been exhausted. Councillors are volunteers, and are not paid to attend meetings. Following feedback from Fish and Game, I do not propose to change this situation now, but if this was enabled in future, it would be funded from the licence fee in line with the Cabinet Fees Framework.</p>
<i>Do licence holders want a change? How interested are they?</i>	
Answer	<p>The negative media attention surrounding Fish and Game, along with ongoing complaints to me and previous Ministers, highlights the need for long-overdue improvements.</p>

	<p>Fish and Game's lack of cohesiveness creates confusion for licence holders. The restrictive eligibility criteria for voting and standing in Fish and Game elections have also contributed to low participation, with only 4.2 percent of eligible licence holders voting in the 2024 elections.</p> <p>This reform aims to strengthen the democratic 'user-pays, user-says' Fish and Game model and improve value for money, which should garner support from licence holders.</p>
<i>How supportive will councillors be of these changes?</i>	
Answer	<p>Fish and Game broadly agree on the issues within the organisation and support the need for change to improve efficiency and effectiveness. Opinions among Fish and Game Councils vary on how to achieve this.</p> <p>I anticipate stronger reactions to certain proposals, such as the New Zealand Council collecting licence fees. Nonetheless, I am confident that this reform introduces the right level of checks and balances, and transparency to assure Fish and Game Councils of how funds will be collected and distributed.</p>
<i>When do you envisage these changes taking place?</i>	
	<p>I am aiming for Royal Assent by the end of this parliamentary term. And I am providing for a transition period of up to 3 years, to be discussed with Fish and Game over this next period. Important that Fish and Game has time and support to properly implement the proposals.</p>
<i>How will you announce this Bill? How much interest will it get?</i>	

Answer	<p>Following Cabinet approval, I intend to make a public announcement in June regarding the policies proposed through the Bill. I anticipate strong interest from Fish and Game, as well as some interest from Treaty partners and other key stakeholders, such as famers.</p>
<p><i>How are regional Fish and Game council interests protected if the National Council is in more control?</i></p>	
Answer	<p>The composition of the National Council is crucial to ensuring that the interests of Fish and Game Councils are duly considered.</p> <p>I am confident that having the Chairs of the Fish and Game Councils form the National Council is the best way to maintain this strong regional link. This structure will ensure that Fish and Game Councils have clear influence and representation at the National Council. Additionally, when setting policies, templates, or strategic directions, the National Council will need to consult with Fish and Game Councils.</p>
<p><i>How will you make sure revenue gets to the right place in this model?</i></p>	
Answer	<p>Firstly, the National Council will have responsibility to collect and distribute licence revenue.</p> <p>It will also need to set a financial strategy, in consultation with regional Fish and Game Councils. This will provide for greater direction to overall need.</p> <p>I will also provide for an allocation model to provide guidance and assurance that money will get to where it is most needed. This needs to be discussed with Fish and</p>

	<p>Game and set in secondary legislation. But in principle I think this should:</p> <p>(1) cover the costs of their core activities, including resource and activity monitoring, (2) reflect hunting and fishing activity in the regions, and (3) a portion of the funds should remain contestable to address key strategic objectives of the organisation.</p>
<i>Do people have to buy a licence to hunt and fish?</i>	
Answer	<p>Different rules apply to different circumstances.</p> <p>People don't need a licence to fish in the sea. However, a licence is required for freshwater fishing, which is issued by Fish and Game for the entire country, except for the Taupō trout fishery, where DOC is responsible for issuing licences.</p> <p>For hunting, Fish and Game issues licences only for game bird hunting, except in the Chatham Islands, where DOC manages the recreational hunting of birds. Other hunting permits are required for other game animals, such as deer and pigs.</p>
<i>What game birds and fish do Fish and Game manage?</i>	
Answer	<p>Fish and Game manage sports fish which are trout, salmon, other salmonids, perch, tench and rudd, as well as game birds, which include, for example, several types of ducks, black swan, pheasants, partridge, and quail.</p> <p>They do not manage game animals, like deer, nor marine species.</p>
<i>Licence holder demographics? Who are the licence holders? Where is the most activity? Where is the least activity?</i>	

Answer	<p>Licence holders are predominantly:</p> <p>Anglers (77.4% of individual licence holders for the 2023/24 season)</p> <p>Male (representing 85.5% of anglers and 94.8% of game bird hunters)</p> <p>Adults (representing 79.4% of anglers and 89.1% of game bird hunters)</p> <p>Freshwater fishing activity has been trending southward, with high activity registered in Central South Island. In contrast, game bird hunters seem to opt for Auckland/Waikato and Southland regions.</p> <p>Conversely, the regions with the least fishing and game bird hunting activity are, respectively, Northland and West Coast.</p>
<p><i>Why aren't more candidates standing for election? Why don't people vote?</i></p>	
Answer	<p>Currently, only adult whole-season licence holders who are New Zealand residents may vote and stand in Fish and Game elections. Additionally, registration for the electoral roll is currently an 'opt-in' system, which may not be fully understood by licence holders when purchasing their licence.</p> <p>The reform will extend voting rights to all resident who have held any kind of adult licence in the three-year period prior to an election. For the 2024 elections, this would have meant that an additional 38,557 licence holders would have been entitled to vote. 135,646 licence holders (rather than 24,299) would have been eligible to vote and stand in the 2024 election.</p>

Do all councils hold elections? How many councillors are there right now?

Answer

In the October 2024 elections, five Fish and Game Councils did not hold elections due to having fewer candidates than available seats. These Councils were Northland, Taranaki, West Coast, Otago, and Southland.

Currently, there are approximately 108 Fish and Game councillors.

What was the problem in Southland? Shouldn't advocacy be taken away from Fish and Game?

Answer

In 2024, Southland Fish and Game Council advocated for a court decision requiring farmers to apply for resource consents for essential farming activities. This has escalated tensions with Federated Farmers.

A large duck population, risking damage to crops, is also exacerbating these tensions. I have taken steps to respond to local needs.

Removing the advocacy function is not the answer: this risks Fish and Game not being able to perform its statutory role in managing sports fish and game birds effectively. Instead, I am providing greater responsibility for the national council in setting direction for advocacy. And ensuring Fish and Game better consider the needs of other resource users when making decisions.

Is the deregulation of trout farming part of this reform? If not, why?

Answer

This reform aims to strengthen and modernise Fish and Game as an organisation and does not concern trout farming in New Zealand.

Trout farming is a separate issue that requires further work to evaluate its potential economic benefits, as well as its associated risks and economic costs to recreational trout fishing. This matter could be considered following the conclusion of this Fish and Game reform.

Appendix 3: Copy of Recommendations

The Minister for Hunting and Fishing recommends that the Committee:

- 1 **Note** that Fish and Game have a statutory role for the management of recreational sports fish and game bird species.
- 2 **Note** I intend to progress legislative change to support Fish and Game to be a more trusted, accountable, and cohesive organisation that provides value for money for its licence holders.
- 3 **Note** that legislative changes will contribute towards tackling the cost-of-living challenges and support tourism and economic activity in our regions.
- 4 **Agree** to create a stand-alone Fish and Game Act, similar to the Game Animal Council Act, to raise the profile of the organisation, noting DOC will work with LDAC on this and any other matter contained in this paper.
- 5 **Agree** to a package of proposals, to be drafted into legislation, that improve Fish and Game's efficiency and effectiveness and value-for-money for licence holders, with the overall intention to:
 - 5.1 maintain regional Fish and Game council decision-making over local matters, which is the cornerstone of the organisation, by focusing local knowledge and resource on improving hunting and fishing opportunities for their region
 - 5.2 no longer require individual regional Fish and Game councils to spend time on some administrative activities, where they are more effectively done by the National Council
 - 5.3 strengthen the leadership role of the National Council to set clear, coherent direction, collect the licence fee, and disperse it so it better supports the core functions of the organisation, including getting funds to where they are needed to support angler and hunter activity
 - 5.4 improve the 'user pays, user says' system and how Fish and Game make decisions, including how it considers non-hunting and fishing interests in decision-making
 - 5.5 strengthen checks and balances to improve accountabilities and transparency and provide adequate backstops so that the responsible Minister can intervene as necessary in exceptional circumstances
 - 5.6 more generally modernise the organisation in line with other entities to support further efficiencies and effectiveness.
- 6 **Agree** to the proposals at **Appendix One**.
- 7 **Agree** to delegate authority to the Minister of Hunting and Fishing to approve other necessary minor and technical changes within the overall policy intent I have described in this paper.

- 8 **Note** that the Fish and Game Governance and Organisational Improvements Amendment Bill bid is a category five priority (referred to select committee in 2025) for the 2025 Legislative Programme.

Appendix 1: Talking points to support you at ECO 14 May (updated)

Reeling in support for reform

- I have already met with all 12 Fish and Game Councils –the first time a Minister has done so, as pointed out by a number of those councils. I have heard their views on changes they think are needed for Fish and Game – as my Cabinet paper noted, there have been many reviews over the years, with no resulting action. This is long overdue and will not be unexpected.
- Views are likely to be varied. I judge that a large proportion will generally support my policy intent [e.g. 9(2)(g)(i) or sit in the middle ground [e.g. 9(2)(g)(i). Some are likely to want my proposals to go further [e.g. 9(2)(g)(i).
- Four councils are likely to have more negative reactions [9(2)(g)(i).
- I have a plan to manage this. I intend to publicly announce my proposals in the week beginning 9 June – this will be targeted at stakeholders with an interest, rather than a wide public communication. As well as Fish and Game – this would include Federated Farmers and other groups likely to be vocal in supporting the need for change.
- But the announcement will not be a surprise. In the days before an announcement, I will meet with the National Council Chair and Chief Executive to discuss the reforms, and work with them to prepare on the ground. I will also brief the Caucus, including relevant local Members of Parliament as needed.

- Immediately before an announcement, I will hold a dedicated, closed session with all Fish and Game councillors to front the nature of the reform proposals and set out next steps. This will include how I plan to work with them over the coming months before a Bill is introduced. I will bolster this with letters to the Chairs of each Fish and Game council and relevant Post Settlement Governance Entities.
- I then propose to meet directly with the four regional Fish and Game councils that have indicated they are less supportive of reform. I will answer their questions and give assurances where I can. While these councils will be priorities, I will also meet with other councils as needed.
- I have already signalled I will attend the meeting of the National Council in June. And DOC officials will support this with a workshop, and report back to me.

The messages I convey are also important to manage this announcement

- I am not proposing sweeping changes and radical reform. I am not stripping away their functions– as some have called for. Much of this is also common sense [e.g. expanding voting eligibility, modernising the entity].
- I will stress this reform intends to free up regional Fish and Game councils to focus their energy on supporting local hunting and fishing needs – not on administration. I believe this was the intention behind the 1990 reform – but it was not well executed.
- Regional Fish and Game councils will still be responsible for setting hunting and fishing conditions. They will still be able to carry out their primary functions – but the intention is to provide frameworks and minimum standards to support that.
- This includes for advocacy: regional Fish and Game councils will still be able to carry out advocacy activities, but within parameters agreed

by and set as a whole by the National Council. Regional Fish and Game councils will be consulted on advocacy activities, and each regional Fish and Game council has a representative sitting on the National Council that signs these off.

- As my Cabinet paper notes, I intend to continue to work with Fish and Game councils over the coming months to hone my proposals. Select Committee will provide a formal opportunity for voices to be heard, and changes, if sensible and reasonable, can be made.
- This is a common-sense - and balanced - approach to reform to give it the best chance of succeeding. I want and intend to bring Fish and Game councils with me.

9(2)(g)(i)

[If needed:] Consequences of no reform

- Without reform, Fish and Game will remain hamstrung by outdated legislation that limits its ability to deliver for licence holders. The status quo has already led to dysfunction and reputational damage. Without change, those issues will only deepen.
- The media issues that have surfaced recently – and many others across the history of the organisation – will continue.
- So will inconsistencies across regions, undermining public confidence and weakening the organisation's ability to advocate effectively. I will also not be able to implement changes that ensure the organisation better accounts for the needs of other users.
- Licence holders will continue to face a system where their voices are not equally heard, and where democratic participation is limited by outdated rules.
- The organisation will face an uncertain future.

Previous/General Talking Points on Reform

Why now?

- Fish and Game have statutory responsibility for managing the sports fish and game bird resource. They are funded by licence sales, not Government, and are at arms-length.
- There are about 150,000 Fish and Game licence holders. Anglers and hunters are estimated to spend between \$113 to \$138 million every year.
- This makes an important contribution to regional economies and supports tourism, wellbeing and the environment.
- However, there have been several reviews, ongoing negative media and many complaints to Ministers over the last 30 years. This has provided plenty of evidence that the legislation prevents Fish and Game from performing their statutory role effectively.
- Current legislation provides for a federated structure of 12 regional councils and a national council with a co-ordinating function and no real 'teeth'. This is not the 'single entity' people perceive.
- This has led to inconsistencies in delivering statutory functions, duplication of effort and wasteful expenditure. Individual councils can and have undermined the organisation as a whole.
- Fish and Game's current setup incentivises under-forecasting of licence sales. This has resulted in \$2 million, over 11 years, sitting idle in regional Fish and Game council reserves instead of improving opportunities for licence holders. In total, Fish and Game reserves currently amount to approximately \$8.7 million.
- Many licence holders are excluded or disengaged from what should be a 'user pays, user says' system (only 4.2 percent of eligible licence holders voted in the last election). Few, therefore, hold Fish and Game

to account for their decision-making, performance, and professionalism.

- There can be 144 Fish and Game councillors (more than Parliament). But positions are not always filled. There are currently 108 councillors serving, supported by about 84 Fish and Game employees across the organisation.
- Change is long overdue. It would enable Fish and Game to provide greater value for licence payer's money. This supports cost of living challenges and could encourage more people into the sport – further boosting the positive contribution the organisation makes.

What am I proposing to do?

- Fish and Game has an important and historic role in New Zealand. I do not want to fundamentally change their model.
- Instead, I want to make changes that drive efficiency and value-for-money for licence holders, and ensure that Fish & Game perform their regulatory role – looking after fish and game stocks for the enjoyment of New Zealanders – well.
- And in doing so, I want to recognise the role Fish and Game play by providing for a stand-alone Fish and Game Act.
- Fundamentally I propose to rebalance Fish and Game functions to:
 - **Lift administrative burdens from regional Fish and Game councils** to reduce duplication and make efficiencies
 - **Strengthen the role of the national council**, to provide greater direction and coherence – but with limitations so they do not become over-inflated.
- The national council will take full responsibility for managing policies like health and safety. It will set binding minimum requirements and parameters for the core regulatory functions of compliance,

monitoring and advocacy. It will employ specialists for the benefit of the organisation as a whole.

- It will also collect and distribute the national licence fee, removing current inefficient triple-handling. This will ensure revenue supports activity and need, and not sit idle in regional bank accounts.
- Regional councils will be freed up to focus on what matters: they will retain access to all the services they need, so that their local expertise can instead be fully focussed on actions to improve hunting and fishing opportunities.
- To support this shift to effective governance and decision making, I propose to:
 - Form the **National Council from the chairs of regional Fish and Game councils**
 - Make a number of **improvements to the 'user pays-user says' model**
 - **Bring governance standards in line** with similar entities and modernise the organisation.
- This will address long standing dysfunction and properly provide for democracy that underpins the organisation. For example, ensuring all licence holders can vote and be elected. Reducing total councillors from 144 to 96. Ensuring these elected councillors meet the standards for public service.
- I will also ensure Fish and Game take better account of the needs of other users and resources when making decisions, such as farmers, aviation and highly threatened native species.
- Finally, I want to **provide for greater transparency and accountability**. This includes the ability for the Minister to intervene where necessary and as a backstop measure, ensuring Fish and Game remains at arms-length.

Next steps

- I seek agreement to progress these, and other minor and technical changes to Fish and Game. These changes will provide for greater unity within the organisation and improve their ability to deliver their statutory responsibilities.
- Ultimately this will benefit the paying licence holder and better enable New Zealanders to go hunting and fishing.

When (indicative timing)	What	Who with	Why
w/c 9 June			
Approx. 2 days prior to online announcement with Fish and Game [w/c 9 June]	Conversation with New Zealand Council Chair and CE	New Zealand Council Chair (Barrie Barnes) and CE (Corina Jordan)	To give Chair and CE early run through of policy changes to support them to both find the right CE (as current CE resigning at end of May) and prepare their internal communications with Fish and Game councillors and staff
	Presentation to Caucus colleagues	Caucus colleagues (note local MPs for relevant councils in particular)	To inform Caucus colleagues of policy changes; how to support announcement and respond to questions from key stakeholders
	Invitation sent to Fish and Game to online closed session	All Fish and Game councillors	To ensure that as many councillors are able to attend as possible
Mid-week in evening [w/c 9 June]	Online closed session – presentation and announcement (likely in evening)	All Fish and Game councillors	To run through policy changes and answer any immediate questions to ensure full understanding of reforms & next steps
	Embargoed press release – immediately following online announcement	To key stakeholders: including New Zealand Council, farming, conservation and aviation sectors	To enable these stakeholders to prepare statements in response to press release (likely to be supportive statements, particularly for advocacy policy changes)
Day following online announcement with Fish and Game	Press release goes live	As above, stakeholders, licence holders and general public awareness	To inform about Minister's intention to introduce Bill and its policy and next steps
	Letters from MHF	To all regional Fish and Game councils and 20 Post-Settlement Governance Entities (those with a statutory	To summarise policy changes, next steps (e.g. select committee to introduce Bill later in the year), and where

		relationship/arrangement with Fish and Game)	to go for more information
	DOC website updated	Proactive release of Cabinet material and regulatory impact statement (required) and support documents, for example, key messages, FAQs	To ensure public can access information that clearly explains the intent of the policy changes and the next steps in the process
Later in June			
12-14 June	Parliamentary Game Bird Hunt	Likely to be Fish and Game councillors and/or staff and other Members of Parliament	Opportunity for informal conversations with stakeholders at the event to generate support for policy changes
27-28 June	New Zealand Council meeting and Department of Conservation run workshop	New Zealand Council and DOC	To answer any specific or technical questions from Fish and Game to ensure fuller understanding of impacts on the ground
July – October			
July	MHF meetings with some regional Fish and Game councils	Prioritised meetings with regional Fish and Game councils who are likely to be less supportive of policy changes ([REDACTED], [REDACTED])	To manage relationships and generate support for policy changes where there may be resistance
July – October	DOC ongoing engagement with Fish and Game as necessary	Select group of Fish and Game representatives	To support drafting process within agreed policy intent, transition and funding allocation model (which is being developed under secondary legislation)

Draft communications plan for discussion

Overall approach to communication

The communications approach is focused on ensuring key audiences, e.g. Fish and Game and specific PSGEs, are informed of the Minister's policy changes and next steps. The approach is not aimed at the general public, but information will be publicly accessible.

Information released to support this approach is either released to support understanding of the Minister's policy changes (fact sheets, key messages), or as a necessary requirement (e.g. Cabinet paper, regulatory impact statement).

The period from Announcement to Bill introduction is not a formal consultation. However, we anticipate there will be feedback, and this period is an opportunity to hear initial views from stakeholders in advance of select committee, and work with Fish and Game to hone certain proposals (e.g. budget, transition). Comms messages would be clear that the select committee stage is the opportunity to provide formal input. Main policy proposals in advance of the Bill being introduced will not change (unless the Minister wishes to return to Cabinet).

Risks

There are some risks associated with sharing information ahead of a formal announcement to Fish and Game. To mitigate the likelihood of information being made public before your announcement we suggest these steps are timed to be within a few days of the announcement. We suggest a similar timeframe for sending out a meeting invitation to Fish and Game.

Key materials:

- Key messages/Q&A
- Press release (embargoed)
- Fact sheets (1-pager) outlining key changes for two audiences (Fish and Game and general public/licence holders)
- Presentations for caucus and Fish and Game councillors
- Proactive release materials: Cabinet paper (including Appendix 1), Regulatory Impact Statement. Most recent policy briefings could also be proactively released to support understanding of decisions to date
- Additional support for subsequent meetings with Fish and Game
- Other materials are listed in the table below to support specific communications tasks.

Fish and Game key dates and actions prior to select committee

Date	Bill process	Communications action	Supporting material	Other important dates
May				
28 April – 23 May	<ul style="list-style-type: none"> • Cabinet decisions to draft Bill (19 May). • PCO drafting from 20 May 	<ul style="list-style-type: none"> • [MHF] ECO. 	<ul style="list-style-type: none"> • [DOC] talking points and support. 	<ul style="list-style-type: none"> • 22 May Budget 2025 night
26-30		<ul style="list-style-type: none"> • [MHF] Meeting with NZC Chair and CE week prior to F&G online closed session (TBC Wednesday 28 May – 3 working days prior to online closed session). • [MHF] Send invite to F&G online closed session and work with F&G to organise date and time (TBC Friday 30 May – 1-2 working days prior to online closed session). 	<ul style="list-style-type: none"> • [DOC] can provide fact sheets for sharing <u>in confidence</u> and DOC could support a follow up conversation with Chair and CE if Minister would like. • [DOC] work with office on lines for invite and can discuss approach with NZC Chair and CE. 	
June				
*We understand preference is for the F&G online closed session w/c 2 June; w/c 16 June is the alternative and would follow similar timing/steps as 2 June option.				
2-13		<ul style="list-style-type: none"> • [MHF] Minister caucus meeting (TBC 3 June 6-7pm – immediately prior to F&G online closed session). • [MHF] presents policy changes to F&G and Q&A session (suggest 1 question per council from each chair to manage feedback received during this session) (TBC 3 June 7-8pm). 	<ul style="list-style-type: none"> • [DOC] prepare factual information in a slide pack presentation for the office to adapt as needed for caucus. • [DOC] can provide slide pack and talking points (including possible Q&A) and be available to support MHF in the meeting. 	<ul style="list-style-type: none"> • 12-14 June: Parliamentary Game Bird Hunt in Wairarapa • [TBC] Licence fee and Anglers

		<ul style="list-style-type: none"> • [MHF] embargoed press release to key stakeholders and/or media (TBC 4 June morning – day after F&G online closed session). • [MHF] issue press release (TBC 4 June early afternoon – few hours following embargoed press release). • [MHF] immediately following press release send letters to F&G and PSGEs. • [DOC] immediately following press release update website. 	<ul style="list-style-type: none"> • [DOC] to provide draft press release. • [DOC] can draft letters for office. F&G: would summarise what the Minister discussed, next steps (e.g. possible workshop, and where to go for information). Specific PSGEs: tailored letters to the three PSGEs who provided feedback either to Minister or DOC, standard letters to the other 17 PSGEs). • [DOC] website: key messages, fact sheets, Cabinet paper, schedule, RIS (with any necessary redactions). 	<p>Notice to Minister for approval.</p> <ul style="list-style-type: none"> • Fieldays 11-14 June
16-27		<ul style="list-style-type: none"> • [MHF/DOC] MHF attend NZC meeting (27-28 June), and DOC could run workshop during NZC meeting following MHF session to answer more technical or specific question and next steps. 	<ul style="list-style-type: none"> • [DOC] can provide memo to support MHF at NZC meeting and workshop presentation/material. 	<ul style="list-style-type: none"> • 27-28 NZC meeting in Wellington
July - October				
		<ul style="list-style-type: none"> • [MHF] meetings with F&G either proactively arranged with priority councils or reactive as opportunities arise. • [DOC] engagement with select group of F&G on funding allocation model progression and transition. • [DOC] proactive communications with key stakeholders and Treaty partners to inform them of Bill introduction. • [MHF] update in F&G newsletter. 	<ul style="list-style-type: none"> • [DOC] can support with meeting memos and support any other ongoing engagement with F&G to support Bill process. • [DOC] to provide advice in due course. • [DOC] can provide lines to support newsletter. 	<ul style="list-style-type: none"> • August: Anglers Notice published in Gazette • September: Fishing licences go on sale

	<ul style="list-style-type: none"> • October: TBC drafting complete and Bill introduced to the House 		<ul style="list-style-type: none"> • [DOC] supporting materials for introduction. 	<ul style="list-style-type: none"> • October: Fishing season starts
--	---	--	--	--

Date	Communications action	Supporting material
Friday 23 May 2025	<ul style="list-style-type: none"> • Meeting with NZC Chair, CE and DCE prior to F&G online closed session. 	<ul style="list-style-type: none"> • An overview of the proposals to modernise and strengthen Fish and Game, which can be shared with Barrie, Corina and Richie in confidence.
Thursday 29 May 2025	<ul style="list-style-type: none"> • Minister for Hunting and Fishing to send invite to F&G online closed session to give sufficient notice ahead of a long weekend. 	<ul style="list-style-type: none"> • DOC will work with office on lines for invite, including Teams link, and can discuss approach with NZC Chair and CE.
Wednesday 4 June 2025	<ul style="list-style-type: none"> • At 12.45PM – Minister contacts 9(2)(a) • At 2pm - Minister sends out embargoed slideshow ahead of closed session to F&G. • At 5.30-6.30PM - Minister presents policy changes to F&G and Q&A session. • At 8-9.00PM – Minister presents policy changes to F&G to key caucus colleagues 	<ul style="list-style-type: none"> • Slide pack presentation • Slide pack presentation and speaking notes. DOC officials will moderate questions and support the Minister in running the session. • Slide pack and speaking notes – adapted to Caucus (prepared by office)
Thursday 5 June 2025	<ul style="list-style-type: none"> • At 9.00AM – Minister’s office to send out embargoed press release and letters to F&G, as well as letters to key stakeholders, licence holders and PSGEs with embargoed press release. • At 12.00PM issue press release on beehive website. 	<ul style="list-style-type: none"> • Embargoed Press release and letters to stakeholders, licence holders and F&G councils – DOC to work with NZC Chair and CE to support DOC with contact list. Letters to F&G: would summarise what the Minister discussed (including summary of policy proposals), next steps (e.g. possible workshop, and where to go for information). Letters to PSGEs: tailored letters to the three PSGEs who provided feedback either to Minister or DOC, standard letters to the other 17 PSGEs. • DOC updates internal staff on announcement details

	<ul style="list-style-type: none"> • DOC] immediately following press release will update website. 	<ul style="list-style-type: none"> • [DOC] website: key messages, fact sheets, Cabinet paper, schedule, RIS (with any necessary redactions).
Saturday 28 June 2025	<ul style="list-style-type: none"> • [MHF/DOC] Minister to attend NZC meeting and DOC could run workshop during NZC meeting following or prior to Minister's session to answer more technical or specific question and next steps. 	<ul style="list-style-type: none"> • [DOC] can provide memo to support MHF at NZC meeting and workshop presentation/material.
July – September	<ul style="list-style-type: none"> • Minister meetings with F&G either proactively arranged with councils or reactive as opportunities arise. • [DOC] engagement with select group of F&G on funding allocation model progression and transition. • [DOC] proactive communications with key stakeholders and Treaty partners to inform them of Bill introduction. • Minister update in F&G newsletter. 	<ul style="list-style-type: none"> • [DOC] can support with meeting memos and support any other ongoing engagement with F&G to support Bill process. • [DOC] to provide advice in due course. • [DOC] can provide lines to support newsletter.
October TBC	<ul style="list-style-type: none"> • Drafting complete and Bill introduced to the House 	<ul style="list-style-type: none"> • [DOC] supporting materials for introduction.

Indicative map of Fish and Game Councils' position on the need for reform

This map represents an indicative view of Fish and Game Councils' (FGCs) positions on the need for reform. We note that:

- The below illustration is based on general discussions you and Minister McClay had with FGCs rather than on specific proposals.
- Your discussions indicated that individual views within each Council may vary, this illustrates views agreed by the Council as a whole.

- 9(2)(g)(i)

- Positions on individual proposals in your package may differ. 9(2)(g)(i)

- Many councils are likely to support some greater role for the NZC in performing some functions, but the scope and nature of this varies. 9(2)(g)(i)

- Regarding how licences are sold and how the budget is distributed, 9(2)(g)(i)

- All Councils express support for broadening eligibility to vote and stand for election.

9(2)(g)(i)