

## External Stakeholder Feedback Form

**Organisation name:** Institute of Cadastral Surveying (Inc)  
**Name(s) of respondent:** Brent George (On behalf of the ICS)  
**Job title of respondent:** Secretary - ICS  
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*Please note: We are required to provide your name and job title to Archives New Zealand Te Rua Mahara o te Kāwanatanga in the appendices to our report. This information will be removed from the final version of the report before making it publicly available.*

### Introduction

The Institute of Cadastral Surveying (ICS) is an organisation whose membership is actively engaged in cadastral surveying.

This response represents the collective views of the ICS Executive Committee and other contributing Members, and is based on the experience and wisdom of NZ Surveyors who are passionate about the integrity and value of the survey system – which includes the historical land records as the building blocks of the cadastral fabric that are key components within that system. It is also submitted in the best interests of landowners and the public - our clients.

We thank you for the opportunity to provide feedback on the revised LINZ Historical Records Disposal policy.

## General feedback section

### Do you have any general comments about any of the disposal recommendations? If so, please outline below

*It may be that some of our specific comments following are outside the scope of this Policy Review request for feedback. Nonetheless, the comments are respectfully offered to reinforce our User/Stakeholder assessment of the importance of the historical records under the custodianship of Land Information NZ.*

In general, the ICS:

- Seeks reassurance that information essential to the land transfer and deeds system (the “survey system”) remains easily and inexpensively available whilst being held/managed by Land Information NZ - before it gets sent to Archives NZ
- We also seek reassurance that information essential to the “survey system” remains easily searchable and inexpensively available after it gets sent to Archives NZ
- As Licensed Cadastral Surveyors and the only people able to authorise a cadastral survey dataset that defines legal boundaries or records property rights information, we consider that ready access to important land information records must always remain available to surveyors (in particular)

With respect to data storage at Archives NZ (in Wellington, Auckland, Christchurch and Dunedin), remote accessibility to those records from anyone outside of these main cities is difficult and expensive. Whilst acknowledging that long term record storage at Archives is probably the best option available (for secure custodianship if LINZ is not going to house them), if/once they have been scanned, the originals should be returned to their communities of interest where local archives facilities are available eg: Pukeariki in New Plymouth for Taranaki records.

We also note the governments “New Zealand Data and Information Management Principles” under [data.govt.nz](https://www.data.govt.nz), developed to ensure the high-quality management of the information the government holds on behalf of the public.

[<https://www.data.govt.nz/toolkit/policies/new-zealand-data-and-information-management-principles> ]

The relevant principles are noted below, with the key aspects - from the ICS perspective - **emboldened**:

- Principle: open  
Data and information held by government should be **open for public access** unless grounds for refusal or limitations exist under the Official Information Act or other government policy. In such cases they should be protected.
- Principle: **readily available**

Open data and information are released proactively and without discrimination. They are discoverable and accessible and released online.

- Principle: **reasonably priced**

Use and re-use of government held data and information is **expected to be free. Charging for access is discouraged.**

These above tenants form the basis of our feedback response.

**Do you have any general comments about any of the retention periods (i.e., how long Toitū Te Whenua/Land Information NZ is proposing to retain records before disposal can take place)? If so, please explain below.**

The ICS considers that the retention periods appear to be reasonable. If documents identified for disposal are adequately scanned and available digitally prior to disposal, then there would be no concerns.

However, once the document is destroyed it is gone forever – so it should be that digital record (scanning) is always undertaken before disposal. Without scanning, it is too late should that record/reference be found to be potentially relevant at a later time.

Before final destruction, hard copy records should be offered back to their communities of interest and local repositories therein (eg: local libraries or museums or genealogy groups etc.) We are aware that many genealogy groups – for example - are very active and house many historical paper and other records deemed not worthy of retention by local Councils that are well utilised for historical research.

We ponder how a document goes from being an essential resource one day, to being considered ready to be sent to Archives NZ – or flagged for disposal – particularly under a general policy that may not consider the uniqueness or historical or potential relevance of the information it contains.

**Do you have any general comments about any aspects of the appraisal report overall? If so, please explain below.**

It appears that the internal (LINZ) contributors to the records disposal proposals are representative across the many divisions within LINZ, and are reasonably senior officers. Therefore, the expectation would be that they fully understand the importance (both historical and potential future value) of the records they manage, and so they should be able to expertly advise what records need to be retained, and those records that may be dispensed with.

It is probable that the subject matter experts within LINZ who were consulted on this policy would call on the more arcane land records more than the average surveyor. This seems to be reflected in the conservative disposal policy.

However, what the LINZ representatives perhaps do not readily provide is the experience of the commercial "record User" - that is, a view from the survey and title industry private sector – the surveyors, lawyers, and conveyancers mainly.

Thus, it is important then that the feedback from these sectors is seriously considered - as opposed to collating feedback request as a mere gesture of consultation, without any real intention of listening (as has often been the case with other calls for stakeholder feedback).

**Specific feedback & commentary**

Item	Record sub-class reference	Comments
1.	1.2.1 Deeds System Records	<p>1.1: Retaining the original documents at Archives is appropriate, however all records need to be scanned (not just the indexes) to provide a complete record</p> <ul style="list-style-type: none"> <li><i>The Deeds Records provide specific details that provide invaluable evidence of the historical land information records. With the NZ Governments policy of managing data and information held on behalf of the public such that it is <u>open</u> and <u>readily available</u> (source: <a href="http://data.govt.nz">data.govt.nz</a>) – then the most efficient way of delivering on this policy is to fully digitise/scan the entirety of the Deeds Records.</i></li> </ul>
2.	3.1.1 Core Survey plans	2.1: Existing poorly imaged plans must be re-scanned.

		<ul style="list-style-type: none"> <li>• <i>The main sets of DP's; SO's; ML's etc were scanned in the mid/late 1990's as part of the pre-population of the Landonline plan library. Where Users have requested specific plans to be rescanned as part of their data searching and assessment (since the 2000's), these have been re-imaged at a greater (=better) resolution and the plan image thence updated in Landonline. Most originally scanned plans are readable, but many would be considered poor quality by today's basic scanned imagery standards.</i></li> <li>• <i>LINZ may know how many plans have been rescanned over the last ~20 years – our estimate would be at least 10,000 if not more - however this number would only account for requested rescans. This demonstrates the generally inadequate quality of that original bulk scan process.</i></li> <li>• <i>All colour plans must be rescanned in colour. This preserves the original intention of the plan in its entirety – where the colour lines and text and washes infer different critical information.</i></li> <li>• <i>All black and white plans that are already imaged must be individually assessed for quality and readability – and rescanned if necessary.</i></li> </ul> <p>2.2: Additional land district specific special plans need to be scanned.</p> <ul style="list-style-type: none"> <li>• <i>For example, in Canterbury, the Black Maps and Red Maps have been scanned (by others) and are available via Canterbury Maps. Yet some other special plan series may not have been done such as Timaru Rolls plans; Proclamation Plans etc. These special microfilm datasets must be scanned – especially if they are to be disposed of.</i></li> </ul> <p>2.3: Ease of access at a low cost is imperative</p> <ul style="list-style-type: none"> <li>• <i>Storage at Archives NZ is appropriate for original records that are to be retained. However, access and/or retrieval to view these records must remain possible at a reasonable (low) cost and without other impediments including access restrictions (viewing times and days).</i></li> <li>• <i>Ideally, all records should be digitally scanned at an appropriate resolution, and made available for free, via 24/7 on-line access.</i></li> </ul>
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3.	3.6 Microfilms	<p>3.1: All sets must be imaged before destruction</p> <ul style="list-style-type: none"> <li><i>We are aware that some of the special microfilm datasets have not been scanned. (refer 2.2 above)</i></li> </ul> <p>3.2 : Any sets already imaged must be reviewed and assessed for clarity and readability – and reimaged at an appropriate resolution – before destruction of the original source microfilms.</p> <ul style="list-style-type: none"> <li><i>We are aware that some of the early microfilm records that were scanned were inadequately checked for quality and are not easily readable.</i></li> </ul>
4.	4.3.1 Crown land tenure records	<p>4.1: Ideally, all records that are transferred to Archives NZ should be digitally scanned and made available via simple and accessible searching systems.</p> <ul style="list-style-type: none"> <li><i>With the NZ Governments policy of managing data and information held on behalf of the public such that it is <u>open</u> and <u>readily available</u> (source: <a href="http://data.govt.nz">data.govt.nz</a>) – then the most efficient way of delivering on this policy is to fully scan the entirety of the Crown land tenure records.</i></li> </ul>
5.	4.3.2 Crown land tenure records – duplicates not in tenure files	4.2: As above.

Compiled by:

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Secretary

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