

30th September 2020

2021 TBFree Disease Control Operations
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Proposed TB Control Operations for 2021

1. The Game Animal Council

The Game Animal Council (GAC), established under the Game Animal Council Act 2013, is a statutory organisation with responsibilities for, *inter alia*, representing game animal hunters, and advising on and managing aspects of game animal hunting. Game animals are feral pigs, chamois, tahr, and all species of deer.

2. Game animals as a resource for New Zealand

New Zealand's game animals are an important recreational, social, and economic resource. The general public of New Zealand values game animals. Over 150,000 people harvest small game, large game, or gamebirds at some time during each year.

All game species in New Zealand are harvested for food, and while deer farming accounts for the vast majority of game meat exports, shot wild game is significant in both export statistics and domestic consumption.

The combination of recreational hunting and aerial recovery expertise developed over the past 50 years allows privately funded control and management of New Zealand's big game populations at no cost to the government.

3. Game species as an economic resource

The deer industry has total export earnings of \$322 million (year ended 2018). New Zealand venison and velvet returns have been at record prices, assisted considerably by the



perception internationally of venison as a safe food item. Consumers have traditionally perceived venison to be a hunted product and often do not differentiate between farmed and hunted sources at the point of purchase or consumption. New Zealand, as a country of origin, enjoys an unparalleled reputation for its farming, environmental and animal husbandry practices.

The guided hunting industry has earnings of approximately \$100 million annually and has considerable potential for expansion. Internationally, New Zealand is considered to be the world's premier destination for hunted red deer stags and Himalayan tahr and is increasingly recognised for the quality of its other game species. It is considered a safe, stable, unpolluted country, and attracts a discerning, influential hunting clientele.

The total gross sales effect of New Zealanders on recreational hunting has recently been calculated in the order of \$350 million annually. Large game species are a major focus of that hunter spend. Less easy to quantify, but probably of greater significance, is the role hunting plays in the national health statistics as a form of recreation enjoyed by tens of thousands.

4. Valued Introduced Species in New Zealand

Deer, tahr, chamois and wild pigs, are legally Wild Animals under the Wild Animal Control Act or Game Animals under the Game Animal Council Act. Collectively with other species such as trout, salmon, ducks, pheasants, quail etc they are collectively known as valued introduced species. These animals are now part of New Zealand.

5. Role of the GAC

The GAC continues to support the goal of eradicating Tb from New Zealand. The Council has a history of working constructively and cooperatively with many agencies including OSPRI and will continue this approach. The Council's role is more at the strategic level than at place. The Game Animal Council recommends that OSPRI deals directly with local hunting

organisations for individual operational design, however, there seem to be some deficiencies in the current process.

The GAC will also assist those local organisations with expertise and coordination. The GAC has no mandate over private land however is able to provide advice to landowners if requested to by those landowners.

6. Strategic issues

6.1 Mitigating the effects of Tb control on game animals and the ability to hunt them.

The overriding concern for the GAC is the direct and indirect effects of Tb control operations on game animals and hunting. Direct effects are the killing of the animals themselves. Indirect effects include the loss of hunting opportunity through closures, buffer zones and risk to hunting dogs. Mitigation measures include, ground control methods, time of year, bait size, sowing rate, bait strength and the scaling up, coordination and integration with other operations to reduce the overall frequency of control operations. The most significant mitigation measure is having an effective repellent that prevents or minimises the deaths of game animals during Tb control operations.

The Game Animal Council acknowledges that a somewhat effective and lower-cost repellent is currently available for deer albeit with limited testing. Further work and trials in various habitats and on other deer species are still required. It is fortunate that recent studies have concluded that tahr are unaffected by aerial 1080 poison however no research has been carried out on chamois and pigs remain at high risk from 1080 poison. The risk to dogs is a significant problem for the hunting community. The GAC is pleased that OSPRI is continuing to foster the development of deer repellents. This development cannot be left to third parties alone.

6.2 Early engagement

The Game Animal Council has worked closely with the Department of Conservation on the design and implementation of its Battle for our Birds program. The Department engages with the GAC at the time of program design, where and which mitigation measures are required to reduce the effects of an operation on game animal populations and ongoing

monitoring which ultimately decides whether an operation goes ahead. There is transparency and full disclosure of all information. This has given the process a greater degree of credibility and acceptability even when the outcome may not be favourable.

6.3 Greater Clarity and detail in Communications

It is important that communications regarding the program clearly enunciate that until it is finalised subsequent to consultation the program in the documentation is draft and can still be amended. Some of the documentation still appears to be the result of cut and paste and a lack of actual information to justify the operation. There are also a number of inaccuracies which do not aid the process of consultation and the GAC requires far more detail and clarity around the occurrence of TB and the rationale for the preferred method of control

6.4 Presence/Absence of TB

Where there is no clear scientific evidence that Tb is or is not present then this needs to be clearly stated. If the justification for an operation is to remove the risk that TB might be present, and if it was present and was not treated would undermine the success of the eradication program, then this needs to be clearly stated. We think that all parties agree that the eradication program needs to be successful, even if for different reasons.

6.5 Restructuring of OSPRI

We are aware that there have been significant changes in the structure, composition, and operations at OSPRI and we will expect to be informed of these once they are completed.



Game Animal Council
NEW ZEALAND

7. Proposed operations for 2021

The following operations are proposed for 2021

North Island

1. Kokomoka-Takahiapo Hawke's Bay/Bay of Plenty
2. Waikoau Hawke's Bay
3. Willow Flat Hawke's Bay
4. Tutaekuri – Mohaka Hawke's Bay
5. Hatepe 3 Taupo/Waikato
6. Kaipo Central North Island
7. Aorangi South Wairarapa/Wellington
8. Southern Remutaka/ Lower Hutt Wellington

South Island

1. Ianthe and One Rim taka Hari Rim taka, West Coast
2. Atarau South Grey West, West Coast
3. Constitution Hill Clarence Reserve, East Coast
4. Bush Gully and Tarndale Molesworth, East Coast
5. Shag Forest

Several the above operations will have significant impacts on key hunting resources and generate considerable adverse reaction from the hunting community.

For example:

Kaipo: This operation proposes to cover almost two thirds of the more easily accessible parts of the Kaimanawa Recreational Hunting Area - one of the most heavily utilised hunting areas in the country. The proposed operation will make the area off-limits to sika hunters with dogs for six months or more, depending on operational timing. The document dismisses the use of ground control methods when parts of Clements Road and Oamaru Hut/Lower Kaipo have been treated in the past using ground control methods.

Tutaekuri-Mohaka: This operation proposes to cover almost all of the easily

accessible country in the eastern Kaweka Recreational Hunting Area – with this areas being the most accessible and heavily hunted country in the Kawekas where hunters use their dogs. Undertaking this operation as planned will make the area off-limits to sika hunters with dogs for six months or more, depending on operational timing. This will have a significant impact on public land sika hunters and as with the Kaipo, ground control methods have been summarily dismissed when in fact much of this area has been successfully treated many times using ground control methods.

In the 1980s at the start of the TB issue hunters undertook ground control in this area in a paired trial: ground vs aerial, proving that they could be at least as successful as aerial methodology. It the GAC's understanding it has been done on the ground every three years ever since, however not for the last 6 years due to OSPRI refining its strategy.

Special Note

Using ground control methods again has special importance in this COVID-19 environment and with the government allocating significant sums of money to get people working again as the effects of COVID-19 bite harder. Using ground control methods will provide many needed jobs and an opportunity to create infrastructure that can benefit other pest control operation in the future.

8. Engagement on these planned Operations

In previous submissions the GAC offered to assist OSPRI to engage with the hunting community in planning and decision making, transparency and effective mitigation measures as this would assist in a more orderly and less adversarial eradication of Tb from New Zealand. The Council is disappointed that OSPRI has not taken up this invitation on these operations. Had this happened, we could have dealt with the many issues raised in this document in a timely manner. The GAC requests a meeting with planning and operational staff to discuss:

1. the rationale for the public land operations,
2. the data that supports this
3. the rationale for the chosen control method

4. The data that supports this choice
5. what range of mitigation measures can be employed to eliminate or reduce the negative effects of these operations on hunters and hunting.



This is an extension of how OSPRI has approached the operations on Molesworth and this had proved successful.

I will contact your office to set up such a meeting with the required people and in the interim if you have any queries relating to this submission, please contact me on 021688531

A handwritten signature in blue ink that reads "Tim Gale".

Tim Gale
General Manager
NZ Game Animal Council