



Feedback on Draft Tahr
Control Operational Plan
1 July 2021 – 30 June 2022

GAME ANIMAL COUNCIL
March 2021



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NEW ZEALAND

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The Game Animal Council (GAC) appreciates the opportunity to provide additional feedback on the 1 March 2021 draft plan discussed at the TPILG meeting on 16 March 2021. The GAC commends the Department on the much-improved consultation process undertaken during development of this plan, with significantly better timelines and more opportunities for involvement by TPILG members.

Comments on DOC email dated 1 March 2021 accompanying release of the draft operational plan

Matters the email claimed could not be addressed in the Tahr Control Operational Plan:

1. **Review of the Himalayan Thar Control Plan 1993:** The email claimed that changing intervention densities and stratification would entail a review the statutory plan. In the GAC's view, that viewpoint is inconsistent with the Himalayan Thar Control Plan, which states: *"The Plan ... is experimental and changes necessary to protect conservation values will be made when required, including amendments to intervention densities and management unit boundaries should they be justified and feasible"* (Page 43). The Plan was designed to be adaptive – including on these matters. The GAC notes the Conservation Act's definition of conservation (and hence conservation values to be protected) includes recreational use¹.

Of most importance in the short term – the GAC can see no limitation on stratification imposed by the Plan. The Plan specifies maximum average densities within Management Units. It also recognises that local densities up to 5 tahr km⁻² are permissible. There are areas within management units known to be devoid of tahr. Mathematically, below-average and above-average areas must offset each other to achieve an overall average for the management unit. Simply, there is no edict in the plan for a uniform density within management units, there is recognition that tahr densities vary within management units, and together this implies that stratification is possible. In the GAC's opinion, stratification also offers opportunities for significant environmental benefits.

The GAC is not proposing stratification or changes in intervention densities in 2021/22, but seeks clarification on these differences in interpretation during the 2021/22 operational plan period to test the availability of these potential management interventions prior to any review of the Himalayan Thar Control Plan.

¹ Conservation Act 1987 S2(1): *conservation* means the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations.

2. **Longer term operational planning:** The GAC is fully supportive of establishing a working group to consider longer term operational planning and would welcome the opportunity to be represented on that group.
3. **Hunter-led management:** The GAC fully supports the initiative for hunter-led management and would like to join with the Department in developing this opportunity.
4. **Optimising control outside the feral range:** It is gratifying to observe the universal commitment in this area and the willingness of hunters to contribute.

Matters differing on detail:

1. **Reduced populations:** The GAC's opinion supports the Department's view that tahr populations are not at intervention density at some locations and is supportive of the plan to obtain better data. It makes sense to concentrate control effort on management units well above intervention density. Information received by the GAC supports the contention that there are still large numbers of tahr in the Landsborough. We do, however, caution about making wider inferences from observations in single locations. The Landsborough has long been known as a tahr hotspot, and the terrain limits ground control. The GAC supports additional DOC control work on tahr in this catchment.
2. **Male biased populations:** The Department does not identify the information source that leads them to believe tahr populations are not male biased. Obviously, as noted in the draft plan, a shift in herd sex ratio will be apparent where control operations have taken place (particularly as female/juvenile groups are loyal to specific locations) and not elsewhere. Counter to the claim in the draft plan, that does have an effect on the "overall herd", despite not doing so outside controlled areas. Field reports made to the GAC by a significant number of extremely experienced hunters confirm that there has been a significant shift in the sex mix in favour of males.

We caution the Department about observations made by control operators who are contracted to hunt females and juveniles. Males occupy different territory and experienced operators will not waste time hunting in male territory. This predisposes aerial operators to observe a mix of animals that is not representative of the overall population.

3. **Prioritising areas with obvious tahr damage:** Dr Reddiex' point is acknowledged. However, it does raise the question of how to focus control efforts if areas of obvious tahr damage are not targeted. Tahr return to favoured locations, suggesting bias towards control at those locations has some merit.
4. **Helicopter aversion:** The degree of helicopter aversion is unknown to the GAC. However, our own field observations, and those of very experienced hunters, confirm that some tahr react to the sound of an approaching helicopter well before tahr are in the field of view of the helicopter's occupants. In this case, helicopter

occupants will not observe tahr taking aversive action. Further, if tahr move their preferred habitat in response to helicopter activity (say by living in the bush), the aversive behaviour will not be observed from helicopters. The continued presence of tahr in visible locations does not mean aversion has not occurred.

We recommend more work be undertaken on this matter for two reasons. Firstly, and most importantly, tahr changing their habitats can result in significant environmental harm. Secondly, there may be a need to change hunting techniques in response to helicopter-averse tahr to ensure effectiveness and efficiency of control operations.

Comments on the Draft Operational Plan

The GAC supports the overall shape of the draft plan but makes some observations on specific components of the plan.

Comments on specific management units

Management Unit 7: Tahr numbers are clearly well below intervention density. We strongly support the lack of control in this unit. That effort is better spent where tahr are problematic.

Management Unit 5: The draft plan proposes buffers for the national park. The GAC notes that buffers were precluded in the Himalayan Thar Control Plan 1993 for good reason – notably that maintaining nanny/juvenile groups at fewer than 10 tahr prevents range expansion (including into the national park). Buffers are unnecessary and contra to the Himalayan Thar Control Plan.

Management Unit 1: It appears that tahr numbers are at or close to intervention density. The planned absence of official control is warranted. The GAC believes this unit is a strong candidate for hunter-led management and would like to explore that possibility further with the Department.

We are supportive of guided ground hunting and AATH in this unit. However, we are concerned about the proposal to allow WARO and the potential for AATH offsets to occur under the proposed plan. These activities may be significant if operators attempt to avoid units where official control is taking place. These activities would make a more significant contribution to achieving the purpose of the plan if they occurred in other management units where tahr numbers remain above intervention densities. For similar reasons, we are concerned about a potential concentration of AATH in MU1 adversely affecting future bull harvests and suggest that while an AATH harvest is supported, the harvest is constrained to avoid that. In addition, there is an opportunity in this management unit for recreational and guided hunters to have an area free of significant aerial activity. We therefore recommend no WARO or AATH offsets in MU1.

Management Unit 4: Tahr populations west of the divide greatly exceed those on the east and have more significant adverse conservation effects. The GAC recommends that the first

45 hours of control should take place solely in Westland NP and be re-evaluated during the halfway review.

Inside the feral range but outside the management units: There are contradictions in proposals for this area.

- The **Control Priority** is “Official control to remove all but recognisable male tahr”.
- **WARO** permits harvest of “nannies and juveniles only”.
- However, **Official Control** targets “control of all tahr”.

This inconsistency should be removed. Because the priority is to remove all but recognisable male tahr, official control should be amended to target nannies and juveniles only. Control in these areas is important to prevent herd range expansion, which only occurs with the presence of breeding females. Bulls, by their nature travel vast distances, both within and outside the management units, but return to where the females are in the breeding season. Consequently, bulls do not contribute to range expansion or pose a significant environmental risk. Controlling bulls in these locations is simply a waste of resources that should be directed to the locations where tahr are causing significant adverse environmental effects. The GAC agrees with the control priority and recommends the supporting activities are consistent with that.

Comments on general provisions

Encourage hunting: The term “encourage” is used throughout in reference to various types of hunting. The draft plan does not identify what the Department intends to do to encourage these hunters. In the interest of establishing realistic expectations the plan should specify what the Department intends to do to encourage hunting.

Reporting recreational hunting kills: Accurate reporting of recreational tahr kills is highly beneficial to all parties, and the draft plan encourages that. The current mechanism for doing so is the Tahr App. This app has failed because of hunter distrust with the Department and, to a much lesser degree, because of a poor interface. The GAC proposes a review of methods for collecting reliable hunter kill data. It is our opinion that to gain hunter buy-in that process will need to be divorced from the Department. The GAC would consider taking a significant lead in any new initiative to allow that to occur.

Ambiguities: There is ongoing confusion about the role, definitions and practices of two items in the HTCP 1993

1. local densities exceeding 5 tahr km⁻², and
2. nanny/juvenile groups exceeding 10 animals.

“Local” is not defined, presenting some operational difficulties. This definition also conflicts with the “groups of 10” concept. Clarification of the definitions and practical guidance for field operations is urgently required to ensure there is common understanding, and to provide clear guidance for control operations.

Clear instructions for those undertaking culling in locations where ground hunters are likely to be or are encountered: Aerial control operators must have clear instructions on the

procedures they must follow to (1) identify whether ground hunters are in the vicinity, and (2) what to do when ground hunters are, or are likely to be, present. The GAC offers its assistance to compile those instructions.

Control exclusion zones around huts, known campsites and ballot area landing sites: The GAC suggests that for this operational plan, no cull zones are established around such areas for safety and to maintain the hunting experience. Control exclusion zones would need to be mapped for operators and hunters. Control exclusion zones could be reviewed for each annual operational plan. The GAC offers to work with DOC to identify control exclusion zone locations.

Priority control zone mapping: At the 16 March 2021 TPILG meeting the hunting sector provided advice on priority tahr-control locations. The discussions were not completed before the meeting terminated. The GAC suggests prioritisation could be refined after initial mapping (by DOC) and offers to work with DOC after initial mapping of priority areas.

Review new population monitoring data in MU3 to identify areas that still need control: Aerial monitoring of tahr populations in MU3 will be completed well before commencement of this plan. While the final analysis may be incomplete, the data will provide a strong indicator of relative abundance compared with earlier surveys. This information should be incorporated into decisions about the quantum and location of control effort in MU3.

Halfway review: The GAC strongly supports the draft plan's proposal for DOC and the GAC to review the need for further control and the locations for control once half of the allocated hours have been expended.

Competition for trophy tahr and conflict at place: If the New Zealand border opens before the end of 2021 hunting guides will have clients from the end of February 2022, which falls in this operation plan period. With a lower overall tahr population and fewer mature males in the national parks, the GAC anticipates more competition and conflict, with high likelihoods of recreational and guided hunters being in the same locations at the same time. The plan should anticipate this conflict and identify how it will be addressed. The NZPHGA, AATH operators and GAC can assist in this process.