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Wild Animal Recovery Operations (WARO) – March Consultation Feedback
Department of Conservation
PO Box 10420
Wellington 6143



waro@doc.govt.nz

Third consultation on 2018 WARO land access recommendations - submission

About the New Zealand Game Animal Council

The New Zealand Game Animal Council (GAC), established under the Game Animal Council Act 2013, is a statutory agency with responsibilities for, *inter alia*, advising and making recommendations (in relation to game animals) to the Minister of Conservation, raising awareness of the views of the hunting sector, and liaising on and managing aspects of game animals and hunting.

Game animals are defined under the Game Animal Council Act 2013 as wild pigs, chamois, tahr, and all species of deer.

Introduction

The GAC's submission is split into three parts:

1. Issues with the limited 2018 WARO land access recommendations.
2. The case for a comprehensive review of the WARO system – something the hunting sector has been told has been in the pipeline for well over a decade.
3. The GAC's recommendations.

With regards to the 2018 WARO land access recommendations, the GAC has not sought to comment on each individual parcel of land as that is best addressed at a local level. Instead, we have provided general advice regarding access and closure dates as well as commentary on the timing of this consultation process.

2018 WARO land access recommendations

Consultation timing

The Game Animal Council is disappointed at the timing of this consultation process, right in the middle of the Roar period. For many recreational hunters the Roar is the most important

time of the hunting year and as such many have organised long trips away in the hills within this period, mid-March through until mid-May. This has made it difficult for them to consider and provide feedback on what are detailed recommendations.

We acknowledge the two-week extension on submissions granted by the Department and are grateful that we were able to negotiate this. We hope that consideration is given to ensuring public consultations on hunting issues are held outside the Roar period in future.

Conservation Context

Based on research of game animal harvest it is known that the recreational hunter harvest currently far exceeds that of commercial hunting (WARO and other). It is estimated that recreational hunters harvest about 135,000 deer, 132,000 other big game animals, and over 230,000 goats per year.¹ Over the last twenty years WARO harvest has averaged less than 20,000 mainly red deer per year.² Decisions based on WARO's current conservation benefits, including land access and closure dates must consider this reality.

Access

A key issue that is not included in this review and that a comprehensive review must seek to address is the conflict between recreational hunters and WARO operators that are spatial and temporal. This includes areas where recreational hunters and commercial hunters are competing for the same resource at different times, as well as situations where they are in physical conflict at the same place and time.

Closure dates

The GAC is concerned that closure dates in some instances do not provide for a long enough period of WARO exclusion around the popular recreational hunting period of the Roar – mid-March to mid-May. This consistently leads to conflict between WARO and recreational hunting and can have an impact on recreational hunter activity in easy-to-access areas. Addressing closure dates only addresses the issue of physical conflict at time and place, it does little to address conflicting management and conservation outcomes.

The case for a comprehensive review of WARO

The GAC advises that the scope of the current review is insufficient to address the key issues inherent in the current WARO system, namely:

1. Sub-optimal conservation outcomes including an inconsistency with the principles of Te Mana o te Taiao – Aotearoa New Zealand Biodiversity Strategy (ANZBS) and Te Ara ki Mua.
2. Long term conflict between commercial and recreational hunters.

¹ GN Kerr & W Abell (2014) Big game hunting in New Zealand: per capita effort, harvest and expenditure in 2011–2012, *New Zealand Journal of Zoology*, 41:2, 124-138.
<http://dx.doi.org/10.1080/03014223.2013.870586>

² Te Ara Ki Mua – The Path Ahead - Deer in Aotearoa Introduction Document

3. Irregular and highly variable operations and animal harvest not related to conservation outcomes.

Sub-optimal conservation outcomes

- WARO as it currently operates is not consistent with the values, principles or intent of the ANZBS, nor is it congruent with the principles and values of Te Ara ki Mua. The GAC strongly supports the approach taken in the development of these documents and is concerned that unless a comprehensive review is undertaken WARO will remain inconsistent with the objectives of ANZBS and Te Ara ki Mua.
- Current WARO principally harvests red deer and for the most part in the open high country. There are no restrictions on the number and demographics of deer harvested. Due to the economics of WARO this can lead to a high proportion of stags harvested in certain places at certain times. High stag carcass weights combined with velvet (if harvested in spring) maximises returns to the WARO operator.
- The removal of stags does little to protect the environment from browsing pressure or reduce future population growth. Stags are highly mobile meaning their browsing impact is dispersed over a large area. It is the female deer (hinds) and their associated family groups that can inflict intense, localised environmental impact on vegetation. As polygynous animals, it is the hinds that are the breeding animals and are therefore responsible for future population growth. Greater management of hinds provides for better conservation outcomes.

Conflict

The removal of stags significantly impacts the desire of recreational hunters to access areas where WARO have taken place. The following issues have created long-term conflict with recreational hunters who feel short-changed by operators who have no obligation within their concessions to consider the impact of their operations on conservation or recreation:

- Currently, the WARO system does nothing to discourage **competition** for the male component of the hunting resource across WARO concession holders, recreational hunters and the guided hunting sector.
- Mature males have both the highest recreational and commercial value.
- Harvesting a large proportion of stags results in a smaller number of breeding males competing for a large number of hinds. This produces an unbalanced herd-structure, poor conservation outcomes and requires more management to restrict population growth.
- Female-dominated herds offer limited value to a large part of the hunting sector (recreational trophy and guided hunters).

Irregular Operations

- Commercial venison recovery has always been sporadic and subject to boom or bust cycles.
- WARO harvest is largely dictated by the economics of operators' costs and the fluctuations of the venison market. This leads to uncertainty for the future of industry and a highly inconsistent commercial wild deer harvest. Commercial

operators need business certainty to ensure WARO is financially viable and sustainable.

- The GAC supports the need for WARO and considers that if it is managed correctly, it can be concerted and coordinated as per Section 4(2)(a)(b) Wild Animal Control Act 1977, with recreational hunting and (where required) official control to be an important conservation tool.

The benefits of a comprehensive review

The GAC notes that a comprehensive WARO review is a considerable workstream and recommends this be funded and undertaken by DOC and GAC in the 2023-2024 year. The GAC considers that by undertaking a comprehensive review the WARO system can be analysed in depth and proper stakeholder consultation take place. This will lead to better conservation outcomes, less conflict and a sustainable WARO system.

Issues to be addressed:

- The lack of game animal population and impact data supporting targeted operations.
 - Improved data gathering and analysis to build effective management plans may be required.
- The WARO harvest.
 - A system incentivising the targeting of hinds and limiting the removal of stags in popular recreational hunting locations may be required. This would have significant conservation benefit.
 - A system that limits WARO operations to difficult-to-access areas for recreational hunters may be required.
 - The identification of red deer herds that are of high value to recreational hunters in the South Island high country. WARO operations could be limited to hinds-only in these areas.
 - Both these initiatives would benefit conservation.
- Fluctuating markets not providing a regular stream of economically viable work for operators.
 - To ensure conservation outcomes are achieved a system incentivising a regular hind harvest could potentially be subsidised or substituted with official control when recovery is uneconomic.
- An open system of communicating WARO concession areas as well as the monitoring and enforcement of WARO concession conditions.
 - This would significantly increase transparency and reduce conflict within the hunting sector.

Recommendations

The GAC's recommendations with regards to the current 2018 WARO land access recommendations are:

- WARO's conservation value must be considered within the context of the overall hunter harvest and the impact that WARO has on recreational hunter activity.
- WARO should be complimentary to (and not conflicting with) recreational hunting and the overall management objectives at place. The current system that is ostensibly an open access regime produces poor outcomes for recreation, conservation and commercial activity.
- WARO exclusion periods should be extended so they do not conflict with the popular Roar hunting period, which runs from mid-March to mid-May.

The GAC recommends the following approach be taken to enable a comprehensive review of WARO:

- WARO activity continues under short-term concessions through the 2022-23 and 2023-24 financial years.
- A comprehensive review is signalled to the hunting sector as well as to recreation and conservation stakeholders.
- A comprehensive WARO review is commissioned for the 2023-24 year and incorporated into the workplans of the DOC and GAC.
- New three-to-five year 'trial' concessions are provided for 2024-25 and beyond based on the outcome of the comprehensive review.

If a comprehensive review is not progressed, we will be stuck with an inadequate WARO system that has limited positive impact on conservation, undermines the effective implementation of ANZBS and Te Ara ki Mua, embeds tensions between recreational and commercial hunting interests and further compromises the long-term viability of the industry. A comprehensive review of the WARO system will strongly support achieving the commitments made in the ANZBS and Te Ara ki Mua.

If you have any queries relating to this submission, please contact me on 021 688 531 or at tim.gale@nzgac.org.nz.

Yours sincerely



Tim Gale
General Manager
New Zealand Game Animal Council