

30 September 2022

National Aerial Operations Plan 2023 consultation  
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## Submission on National Aerial Operations Plan 2023

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### **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 advising on and managing aspects of game animals and hunting.

### **Game animals and the New Zealand hunting sector**

Game animals are defined under the Game Animal Council Act 2013 as wild pigs, chamois, tahr, and all species of deer. Game animals are also recognised as valued introduced species in Te Mana o te Taiao – the Aotearoa New Zealand Biodiversity Strategy 2020, which states:

*Reaching a balance to ensure that valued introduced species continue to provide the benefits they are valued for, while also ensuring that indigenous biodiversity thrives, is a key challenge for Aotearoa New Zealand.*

Hunters play a key role in game animal management, and it is estimated that recreational hunters alone are responsible for harvesting approximately half a million game animals and pest goats each year.<sup>1</sup>

All game animal species in New Zealand are harvested for food, with wild game being a significant contributor to both export and domestic consumption.

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### **GAC's position on bovine TB**

The GAC continues to support the goal of eradicating bovine TB from New Zealand. The GAC has a history of working constructively and cooperatively with many agencies including OSPRI and will continue with this approach. The GAC's role is at the strategic level and in assisting local organisations with expertise and coordination. The GAC has no mandate over

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<sup>1</sup> 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, DOI: 10.1080/03014223.2013.870586

private land. However, we do have a statutory function to advise private landowners on hunting issues.

### **Impacts on game animals and hunting**

The GAC's statutory mandate with regards to bovine TBFree operations is the direct and indirect effects of these on game animals and hunting. This includes significant by-kill of game animals, particularly deer and wild pigs, the impact on hunting opportunities and the harvesting of wild game meat, and the significant risk that 1080 poses to hunting dogs.

Recent studies involving the GAC have indicated that tahr are largely unaffected by aerial 1080 operations, however no research has been done on the impact on chamois.

Mitigation measures include utilising ground control methods, the timing of operations, 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 deer repellent that prevents or minimises deer by-kill during bovine TB control operations.

### **Improved engagement**

The GAC wants to again acknowledge the work OSPRI is doing to engage and provide information to the community, including through local groups such as the Kaimanawas/Kawekas and Lower North Island groups. The GAC has a constructive working relationship with OSPRI and its staff, which promotes the consideration of alternative options and mitigation measures to reduce conflict with the hunting sector over bovine TBFree operations.

We also commend OSPRI for providing more information to the public and stakeholders on the process for eradicating bovine TB from a region as set out in the National Aerial Operations Plan 2023. This is something the GAC has previously advocated for, and the information provided will assist the public, including hunters and hunting groups understand the process required to eradicate bovine TB from an area.

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### **Proposed Operations for 2023**

The GAC will focus this part of our submission on the proposed operations that will have a significant impact on game animals and hunters. Other proposed operations will also have an impact on hunting, and we strongly recommend that mitigation measures, particularly the use of deer repellent, are used to reduce deer by-kill in these operations.

#### Whitcombe/Mungo – Newton Range

This proposed operation is causing a high level of concern within the hunting sector as the area is home to the iconic Rakaia red deer herd, which produces some of New Zealand's (and the world's) most sought-after free-range trophy red stags. Deer exist in this area in

relatively low densities, however, that does in no way lessen the importance of the area to hunters. It is home to historic bloodlines and receives substantial hunting pressure.

The GAC understands the necessity to incorporate kea mitigation measures into this operation and supports kea protection generally. We are concerned, however, that this may involve not using deer repellent due to recent thinking that deer repellent may be more attractive to kea. The GAC notes, however, that there has yet to be any meaningful scientific studies on this issue. The GAC's recommendations with regards to this operation are:

- Employ deer by-kill mitigation measures, including the use of deer repellent; or alternatively,
- Put back the operation until suitable scientific research has taken place and can prove whether or not there is an uptake impact of deer repellent on kea; or alternatively,
- Undertake ground control measures as happened in 2018 on the eastern side of the Main Divide (for context, the 2018 operation in the Wilberforce/Mathias valleys was administered by DOC with ground control operators laying cyanide).

The consequence of the operation going ahead without deer repellent added to cereal baits will be extremely high deer mortality and serious long-term impacts, including the ongoing viability of this iconic deer herd.

The GAC makes the request for further liaison with OSPRI on this proposed operation.

#### Rainbow (Marlborough)

The Wairau/Rainbow area is a popular recreational area easily accessible from both Nelson and Blenheim. It is home to deer, pigs and chamois in moderate numbers and is very popular with hunters. Applying deer by-kill mitigation measures in this operation will be important to maintain a viable deer population.

- The GAC strongly recommends the use of deer repellent.

#### Clarence Reserve South

The GAC recognises the ongoing engagement with local hunting groups in this region and acknowledges and supports the proposal to apply a newly trialled deer repellent and low-sow treatment formulation.

#### East Hawea and Timaru Creek

Both the East Hawea and Timaru Creek proposed operations cover a popular recreational hunting area. We also note that the Timaru Creek operation comes very close to the internationally popular Te Araroa Walkway.

- The GAC recommends mitigation measures to reduce deer by-kill are employed, particularly the treatment of cereal baits with an appropriate deer repellent.

The GAC makes the request for further liaison with OSPRI on these proposed operations.

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

Yours sincerely

A handwritten signature in blue ink that reads "Tim Gale". The signature is written in a cursive, flowing style.

**Tim Gale**  
General Manager  
New Zealand Game Animal Council