

28 September 2023

National Aerial Operations Plan 2023 consultation
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Submission on National Aerial Operations Plan 2024

New Zealand Game Animal Council

The New Zealand Game Animal Council (GAC), established under the Game Animal Council Act 2013, is a statutory entity with responsibilities for, *amongst other things*, 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.¹ All game animal species in New Zealand are harvested for food, with wild game being a significant contributor to both export and domestic consumption.

GAC's position on bovine TB

The GAC continues to support the goal of eradicating bovine TB from New Zealand. The GAC works constructively and cooperatively with many agencies to mitigate the impact of pest and TB control operations, 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 private land. However, we do have a statutory function to advise private landowners on hunting issues.

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, DOI: 10.1080/03014223.2013.870586

Impacts on game animals and hunting

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

Meat hunting is extremely important to many communities around New Zealand, and the GAC has received a large number of anecdotal reports of an increase in this importance over the last year as cost-of-living pressures bite. This has intensified concerns regarding the use of toxins and the impact that has on a community's ability to access harvestable wild game.

Request: The GAC requests that the above concerns be considered in the planning and consultation stages as well as the implementation of operations. This is particularly important in locations close to provincial towns and centres.

Current 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 the use of an effective deer repellent that prevents or minimises deer by-kill during control operations. We strongly recommend that these measures, particularly the use of deer repellent, are used to reduce deer by-kill in important hunting locations.

Recent studies involving the GAC have indicated that tahr are unaffected by 1080 poison, however no formal research has yet been undertaken on the impact on chamois.

GAC and OSPRI

The GAC has a constructive working relationship with OSPRI and its staff, and we value the quarterly opportunities to discuss upcoming operations and the consideration of mitigation measures to reduce conflict with the hunting sector and communities over TB Free operations. We thank OSPRI for undertaking a proactive consultation approach, providing mapping, clear proposed operational details, and an appropriate consultation period.

Request: For future operations, in the proposed operational plan is there the opportunity to provide links to online mapping that outlines the operational area? This will support submitters being able to visualise the operation at scale.

Proposed Operations for 2024

The GAC will focus this part of our submission on the proposed 2024 operations that will have a significant impact on game animals and hunters. The location of operations not discussed in this section are still likely to be areas visited by hunters and where game

animals are harvested, so we ask that mitigation measures as previously outlined, are considered during planning.

Northern Remutaka

The northern Remutaka Range, while not a nationally renowned hunting location does have importance for many hunters as it lies alongside significant population centres in Lower and Upper Hutt, Southern Wairarapa and Wellington central. The GAC encourages OSPRI to continue to engage with the New Zealand Deerstalkers Association (NZDA) National Office as the NZDA has expressed the need for mitigation measures (specifically deer repellent and operational timing outside of high hunter usage periods, e.g., undertake operation during winter months) on the DOC managed public conservation land and permitted Council hunting areas due to the high value of this area to local hunters.

Upper Ahaura Nancy (West Coast)

This is a large operational area that is used by both hunters from Greymouth and the West Coast as well as those from Canterbury. Parts of the Crooked-Morgan, Haupiri-Waikiti and Waiheke-Tūtaekurī-Trent hunting blocks lie within the operational area and are home to red deer and chamois, with some pigs in the Crooked-Morgan block. The area is also an important tramping and trout fishing location. The GAC requests that consideration is given to the use of deer repellent and other mitigation measures and that communication with local NZDA, and other recreational organisations is ongoing.

Clarence Reserve North, Clarence West, and Mount Alexander

The GAC appreciates its consultation with OSPRI over operations in the Clarence Reserve Vector Control Zone. We are pleased to note that mitigation measures including a low sow rate and deer repellent are to be applied in the Clarence West Operation.

We also appreciate the requirements of the Kea Code of Practice may not permit the use of deer repellent in the Clarence Reserve North operation if populations of Kea are known to be present, although we would like to see more work done to fully understand whether or not the use of deer repellent does negatively impact kea in the wild. The GAC requests that other methods are implemented to mitigate the impacts of this operation on deer.

The GAC encourages OSPRI to continue to engage with the NZDA Marlborough Branch as they have expressed several concerns regarding these operations, including the need for mitigation measures (primarily the use of deer repellent) due to the high value of this area to hunters in the region. We understand NZDA Marlborough are submitting on this Plan, and we would expect their submission will receive due consideration.

The GAC looks forward to its future engagement with OSPRI regarding the planning and implementation of TB Free operations and is keen to ensure a continuation of the current positive relationship between the two organisations.

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

A handwritten signature in blue ink that reads "Tim Gale". The signature is written in a cursive style with a large initial 'T'.

Tim Gale
General Manager
New Zealand Game Animal Council