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National TBfree Operations Consultation
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Submission: OSPRI/TBfree National Aerial Operations Plan 2027

Introduction

1. The New Zealand Game Animal Council (GAC) appreciates the opportunity to provide feedback on OSPRI's proposed National Aerial Operations Plan 2027.
2. We note that the current consultation is focused principally on the proposed operations, rather than the purpose of the TBfree programme or the use of 1080 generally. Our comments below are provided in this context and address specific operations, operational matters and mitigation measures we ask OSPRI to consider.

New Zealand Game Animal Council

3. The GAC, established under the Game Animal Council Act 2013 (GAC Act), is a statutory entity representing the interests of the hunting sector and working to improve the management of game animals in New Zealand.
4. The GAC holds functions under the GAC Act, including advising and making recommendations to the Minister for Hunting and Fishing, raising awareness of the views of the hunting sector, liaising on and managing aspects of game animal hunting, and improving hunting opportunities. These functions have underpinned the GAC's engagement with OSPRI over successive National Aerial Operations Plans.
5. The Sika Herd of Special Interest (Sika HOSI) was recently designated by the Minister for Hunting and Fishing. The GAC manages this herd under a statutory herd management plan to deliver hunting and conservation benefits.

Game animals and the New Zealand hunting sector

6. Game animals are defined under the GAC Act as deer, tahr, chamois and wild pigs. Game animals are also recognised as valued introduced species.

7. Game animals provide value to New Zealand communities as a recreational, community and food resource. Reaching a balance that ensures game animals continue to provide these benefits, while also ensuring that indigenous biodiversity and our agriculture sector thrive, is a key challenge for New Zealand.
 8. The number of game animal hunters in New Zealand is estimated to be between 50,000 and 80,000, the vast majority of whom are recreational hunters. Hunters play a key role in game animal management and provide food for their communities, often through voluntary donations.
 9. Recreational hunters harvest approximately 370,000 game animals each year (258,000 deer, 27,000 tahr, 6,500 chamois, 83,400 pigs) and around 440,000 goats and wallabies each year.¹
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Position on bovine TB

10. The GAC continues to support the goal of eradicating bovine tuberculosis from New Zealand.
11. We recognise the progress that has been made through the TBfree programme and acknowledge the importance of preventing transmission between infected wildlife and farmed cattle and deer. We also recognise that possum control is a critical component of the programme and the challenges for OSPRI in undertaking effective control in remote parts of New Zealand.

GAC and OSPRI

12. The GAC values its constructive working relationship with OSPRI and the opportunities we have to discuss future and planned operations, hunting values and mitigation measures.
13. Previous GAC submissions have consistently supported a cooperative approach between OSPRI and the hunting sector that is based on information sharing and enables OSPRI to pursue TB eradication objectives while seeking to avoid or reduce adverse effects on game animals, hunting, and wild meat harvesting wherever possible.

Impacts on game animals, hunters and wild-meat harvesting

14. Aerial application of 1080 can cause very high levels of mortality in wild deer and pigs. The scale of mortality is variable between species, environments, bait types and operations. From the GAC's perspective, this makes it critical that operations are evidence-based, designed precisely and undertaken with appropriate

¹ NZGAC. 2026. The value and drivers of recreational hunting. A hunter survey report (*In press*).

measures to minimise impacts on game animals, hunters, and wild-meat harvesting, particularly in high-use or highly valued hunting areas.

15. The GAC also considers the animal-welfare impacts of non-target poisoning to be important. The GAC supports methods and operational practices that minimise unintended mortality and where by-kill may occur, achieve the most humane outcome reasonably possible. The GAC does not support avoidable non-target mortality or methods that cause unnecessary or prolonged suffering.
16. The GAC has consistently advocated for the use of deer repellent where deer populations are likely to be exposed to aerial operations. Deer repellent remains an important mitigation measure, but other measures such as operational timings, bait size, sowing rate and strength, and coordination with other control methods, such as ground control, are also necessary to reduce impacts on game animals and hunting.
17. The GAC's interest in TBfree operations extends beyond the potential immediate mortality impacts on game animals. This is because aerial control operations can also adversely impact on hunting and hunter values such as meat provision, health and wellbeing, connection to others and our wild places.
18. Wild game meat is an important source of food for hunters, their whānau and communities. Following a 1080 operation, safety precautions prevent deer harvested within the treatment area and the applicable buffer zone from being taken for consumption for four months. For deer, the current buffer zone is two kilometres from the treatment area. This restriction applies irrespective of whether deer repellent is used.
19. This means the application of aerial 1080 will significantly affect hunting even where deer by-kill is successfully minimised. Hunters may still be able to enter an area, but for those whose primary purpose is meat harvesting, the operation effectively removes the opportunity for the duration of the caution period. This not only affects families and communities but can also undermine recreational hunters' efforts to manage game animal herds effectively.
20. Hunting dogs are another significant concern. Dogs are highly susceptible to 1080 poisoning, particularly secondary poisoning through interactions with poisoned animal carcasses. This risk can remain for months after an operation and may persist beyond the wild-meat caution period. This is particularly important for many pig hunters and others who routinely hunt with dogs.
21. The impacts on hunting and hunter values are well recognised by hunters. Toxin use and animal-control operations repeatedly emerge through GAC engagement and community studies of hunters as a significant concern.

22. The GAC expects the broad impacts on game animals, hunting and hunter values to be considered when OSPRI plans aerial toxin operations.
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Kaweka East and Kaweka South

23. The proposed Kaweka East and Kaweka South operations are the GAC's principal concern within OSPRI's 2027 National Aerial Operations Plan.
24. The GAC recognises the TB situation OSPRI is seeking to address, the spread of a TB strain previously associated with the western side of the Kaweka Range to the east of the Range and the need to prevent further transmission.
25. We acknowledge OSPRI's assessment that the terrain makes ground control impractical 'or unlikely to achieve the necessary coverage'.

Sika Herd of Special Interest

26. A herd of special interest (HOSI) is a herd of game animals on public conservation land that is managed for hunting, while continuing to protect the natural conservation values of the area. HOSI are designated by the Minister for Hunting and Fishing.
27. The Central North Island Sika HOSI was formally designated in July 2026. The designation gives the herd a specific management framework under the GAC Act and recognises its importance as a highly valued public hunting resource.
28. The GAC has been delegated specific herd management functions for the HOSI, with operational delivery supported by the Sika Foundation under arrangements with the GAC.
29. The Kaweka East operational area is entirely within the Sika HOSI, while the northern part of the Kaweka South operation also overlaps the HOSI. Please refer to Appendix A for the map of the area. Although the operational footprint directly overlaps only one of the HOSI's nine management units, the associated two-kilometre wild meat caution buffer will affect hunting and wild meat harvesting across parts of two additional management units.
30. The purpose of the Sika HOSI is to provide for the long-term management of the Central North Island sika herd within the HOSI area for both hunting and conservation outcomes. Deer population monitoring, recreational harvest and the ability to manage the density, age and sex structure of the herd are all part of the adaptive management approach.
31. The GAC acknowledges OSPRI's recognition of the HOSI as a valued hunting area and the intention to use deer repellent where the operations overlap the HOSI. We also acknowledge the proposal to use deliberately low sowing rates and

undertake the operations outside the principal roar period, with Kaweka East proposed from June 2027 and Kaweka South from July 2027.

Deer repellent and other mitigations

32. The GAC strongly supports OSPRI's intention to use deer repellent throughout the Kaweka East operation and across parts of Kaweka South. The GAC considers it important that repellent is used throughout all parts of Kaweka South that overlap or are within two kilometres of the HOSI.
33. Evidence from the 2022 operational trial undertaken in Kaweka Forest Park, where sika deer were present, indicates that effective deer repellent can substantially reduce the risk of sika by-kill while maintaining effective possum control. The case for its use is therefore particularly strong in an area established specifically for active management of the sika herd.
34. The GAC requests OSPRI work with affected landowners to secure agreement to use deer repellent in those parts of the Kaweka South operation that are within two kilometres of the HOSI to mitigate impacts on sika moving in and out of the HOSI area.
35. The two proposed operations have the potential to directly impact the management objectives of the HOSI. Even where mortality is reduced through the use of deer repellent, the subsequent four-month restriction on harvesting sika for food, and the long-term danger to dogs can affect hunting pressure and harvest.
36. The GAC requests further examination of operational boundaries within the HOSI and consideration of additional measures to minimise impacts on sika and hunting. While the proposed mitigation measures are positive, they cannot prevent all impacts on hunting, meat harvest, and sika management within the operational area. Specific relief sought is outlined in the section below.
37. If aerial operations within the HOSI are necessary, they must form part of an effective, coordinated landscape-scale programme that permanently addresses TB risk on adjoining land and minimises the risk of reinvasion and reinfection from surrounding areas.
38. The GAC seeks clarity on whether the proposed operations will successfully achieve TB freedom in this area or only provide temporary suppression, with further operations being envisaged.
39. If this operation is only intended to deliver temporary suppression, the GAC seeks to work closely with OSPRI to identify and establish, where practicable, approaches for the sustainable suppression of possums to achieve long-term TB freedom that removes or reduces the regularity of impacts on sika and hunting within the HOSI. For clarity, the GAC does not support isolated operations that

provide only temporary suppression and result in repeated toxin use within the HOSI.

Relief sought

40. Consider incorporating the two-kilometre exclusion buffer into operational drop zones. Incorporating the buffer would help to reduce the impacts from the Kaweka East and Kaweka South operations on the KWS and KWC Sika HOSI management units.
41. Consider whether any of the operational drop zones within the Sika HOSI can be excluded, reduced or treated using effective ground-based or alternative methods without compromising the TB eradication objective. The GAC would welcome the opportunity to work with OSPRI in exploring this.
42. Use deer-repellent bait in any areas that overlap with the Sika HOSI area, also considering the two-kilometre buffer zone in operational planning.
43. Undertake appropriate monitoring to assess sika by-kill and possum-control efficacy following the operations.
44. Use the lowest sowing rate that achieves the required possum-control outcome while minimising the risk of sika by-kill and avoiding unnecessary or prolonged suffering among non-target animals.
45. Retain operational timing outside the sika rut and periods of highest hunter use, while also considering the four-month wild game meat caution period when final dates are confirmed.
46. The GAC welcomes the opportunity to work with OSPRI as it develops a longer-term TB eradication strategy with the aim of maximising the effectiveness of the proposed operations, avoiding the need for future or repeated aerial toxin operations within the HOSI, and reducing adverse impacts on management of sika and hunting opportunities.

Engagement with mana whenua

47. Hunting and the harvesting of game animals are important contemporary food gathering and recreational activities for many Māori across Aotearoa.
48. The GAC acknowledges that there are different and strongly held views on the use of 1080, including in relation to the spiritual and ancestral connections, responsibilities, rights and interests of mana whenua.

49. The use of 1080 is likely to impact mana whenua and their ability to gather food and undertake other mahinga kai activities.
50. Ongoing engagement with mana whenua in the Sika HOSI area will be important to ensure their views are adequately represented both during design of any operations and during implementation.
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Other proposed 2027 operations

51. While the GAC's principal focus in this submission is on Kaweka East and Kaweka South, the other proposed operations (Kokomoka Takahiapo, Willow Flat–Waitara Valley, Clear Stream and Benmore) will also impact areas used for hunting and containing game animals.
52. We therefore ask OSPRI to apply the same general principles, methods and operational practices to minimise unintended by-kill and animal-welfare impacts:
- a. Deer repellent should be used.
 - b. Sowing rates should be kept to the lowest level possible.
 - c. Timing should avoid periods of high hunter use.
 - d. Ground or other non-aerial methods should continue to be considered where they can achieve the required outcome.
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Conclusion

53. The GAC supports the objective of eradicating bovine TB and recognises the difficult task OSPRI has in controlling the spread of the disease across large and challenging landscapes.
54. At the same time, game animals and hunting areas are valued public resources with hunting delivering significant recreational, food, community and game-management benefits. The effects of aerial toxin operations on those values must be treated as an important consideration.
55. This is particularly important for the proposed Kaweka East operation and the part of Kaweka South operation that overlaps or is within two kilometres of the newly established Sika HOSI.
56. We acknowledge and support OSPRI's proposed use of deer repellent, lowest effective sowing rates and timing outside the roar for these two operations.

57. The GAC wishes to see consideration of further alternatives, boundaries and other measures to mitigate sika by-kill and impacts on hunting and venison consumption.

58. The GAC welcomes the opportunity to work with OSPRI as it develops a longer-term TB eradication strategy.

59. The GAC values its constructive relationship with OSPRI and looks forward to continuing that engagement as the 2027 operations are refined.

If you have any queries relating to this submission, please contact me at corina.jordan@nzgac.org.nz.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Corina Jordan', with a stylized, flowing script.

Corina Jordan
Chief Executive
New Zealand Game Animal Council

Appendix A

Kaweka East and Kaweka South Sika HOSI overlap

