

17 November 2023

Gwyn Thurlow CEO and General Counsel New Zealand Deerstalkers Association Inc PO Box 12015 Thorndon Wellington 6144

By email: gwyn.thurlow@deerstalkers.org.nz

Dear Gwyn,

Thank you for taking the time to make your submission on OSPRI's National Aerial Operations Plan 2024.

We thank you for raising your concerns on behalf of NZDA members, supporters and big-game hunters in New Zealand. Your support for the TB free programme and recognition of the risk bovine TB poses for farmed and wild herds is appreciated. In response, OSPRI wants to ensure your concerns and issues are addressed appropriately. OSPRI agrees that understanding the location and importance of high value herds should be incorporated into future planning. We endeavor to be more informed and will use the locations listed in your submission document for future reference. We would value your input in this space, what would be helpful is to sit down and generate maps showing the distribution and make up of the species mentioned in your document, particularly the different red deer herds.

In response to your concerns around the indiscriminate use of 1080. We assure you that OSPRI's pest control planning considers several factors. Central to this is drawing on historic records of infected herds, and wildlife infections captured through surveys. Using this data, we do what's called 'spatial modelling' which shows the likely patterns of disease spread. Planned operations are deemed critical for achieving disease management objectives for the reasons listed in the consultation document.

In response to your recommendation around timing, all 2024 aerial operations are planned to avoid the roar where possible.

North Island Operations:

OSPRI considers the use of deer repellent within our operations on a case-by-case basis, but the additional operational is a major obstacle, and as a result repellent is applied as budget allows. In the case of the Northern Remutaka aerial operation, several submissions have highlighted the need for OSPRI to apply deer repellent to 1080 bait used on public conservation land where there are significant areas of hunting interest. Following this feedback OSPRI has set aside budget for deer repellent in the Northern Remutaka however, the extent of these areas requires further discussions with interested stakeholders such as the NZDA and local Hutt Valley Branch.

OSPRI continues to consult with other landowners within the operation on the use of deer repellent however, to date they have been unsupportive of its use on the land that they administer.

OSPRI

South Island Operations:

We acknowledge your recommendation to treat in winter and late winter only. Where possible, winter operations are planned in the first instance. Unfortunately, strict stock management requirements mean the Rainbow operation can only occur in April or May 2024. To avoid the roar, OSPRI is aiming for toxic treatment in May. Similarly in the Clarence Reserve, aerial timing for May/June has been determined with the major landowner and their stock movements. There is the possibility that Mt Alexander will be undertaken in conjunction with the Clarence Reserve North operation to increase operational efficiencies and simplify consenting requirements. OSPRI has a responsibility to ensure impact on farming operations is kept to a minimum and we make significant efforts to do this while also considering hunting interests. On the West Coast, all operations are scheduled for your preferred timeframe.

We acknowledge your recommendation to apply OSPRIs low sow rates across all TBfree operations. The Mt Alexander and Clarence treatments will be undertaken with low sow specifications while Rainbow will be treated with our standard recipe of 2kg per ha. The standard recipe for Rainbow is a reflection of the high possum numbers detected through our recent ground control work. Between November 2021 and June 2022, over 2200 possums were killed via the established bait station network. The operational RTC has been estimated at 24%, well exceeding the population densities through the Clarence and Mt Alexander areas. Low sow methodologies are effective in Upper South Island high country where possum densities are comparatively low (and home ranges therefore larger). If Rainbow is to see disease management objectives achieved after one treatment, OSPRIs standard sowing rate must be applied here.

Regarding your recommendation to use deer repellent, OSPRI has initiated discussions with the Department of Conservation (DOC) and local lwi around the use of deer repellent. As you are aware, deer repellent is not permitted where Kea are present. While we recognise the points local branches have raised debating the Departments position on this, OSPRI must adhere to prescribed consent conditions. With that being said, OSPRI, lwi, the Department, and local landowners have developed a good working relationship in this space. There may be some areas of lesser risk where repellent could be applied. Details of where deer repellent could potentially be used are still to be worked through. Prodeer trials are also underway in Arthurs Pass and both DOC and OSPRI are committed to using the findings to employ justifiable mitigatory measures in the future.

For further information about the TBfree programme and our pest control work, please explore our library of factsheets at www.ospri.co.nz/publications-resources/.

Thanks, The Team at OSPRI