

**To:** OSPRI – National TBFree Operations Consultation  
**Attention:** National Aerial Operations Plan 2024  
**By Email:** [consultation@ospri.co.nz](mailto:consultation@ospri.co.nz)  
**By Mail:** PO Box 3412, Wellington 6140



**Date:** 28 September 2023

Prepared by Gwyn Thurlow, Chief Executive and General Counsel

## PRELIMINARY MATTERS

|  |   |
|--|---|
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| <b>What are the proposed aerial operation/s you are commenting on?</b> | All of them.  |
| <b>What is the primary subject of your feedback?</b>                   | <ul style="list-style-type: none"><li>✓ Timings of proposed operation</li><li>✓ Boundaries</li><li>✓ Impact on business or commercial activity</li><li>✓ General operational concerns</li><li><input type="checkbox"/> Other (please state): <i>Use of deer repellent</i></li></ul> |

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## INTRODUCTION

1. The New Zealand Deerstalkers Association welcomes the opportunity to submit on the OSPRI National Aerial Operations Plan 2024.
2. This submission is made on behalf of approximately 12,000 New Zealand Deerstalkers Association members, our 34,000 supporters and the estimated 85,000 recreational big-game hunters in New Zealand.
3. These tens of thousands of active hunters are major users of much of the land proposed to be affected by aerial operations in 2024.
4. We firmly believe in sound and reasonable conservation policies that support New Zealanders' rights to access and enjoy the outdoors and public places freely. The NZDA and its members are strong advocates for the recreational value of land. We also recognise the need to protect farming interests and to protect against the dangers of bovine TB.
5. The NZDA recognises the need to protect conservation land and all flora and fauna that are culturally, environmentally, historically and recreationally valuable to New Zealanders. The NZDA and its members are actively involved in protecting and managing our conservation land, whether big game animal management ongoing regional conservation projects, including pest eradication.
6. We affirm our right to recreationally enjoy nature.
7. We support pest control that is justified to obtain measurable and lasting strong conservation outcomes, effective disease control or eradication where possible. We expect proposed actions to be fair, transparent and open while fully considering all recreational values while fostering constructive partnerships with landowners and all users, including hunters.
8. We present and reflect the views of our 600 committee members, 34,000 supporters, 12,000 members and the 49 incorporated societies they are a part of.

## **BACKGROUND**

9. Founded in 1939, the New Zealand Deerstalkers Association (NZDA) is a voluntary organisation with an 84-year history.
10. With 49 branches nationwide in both urban and rural locales, it represents 12,000 active members.
11. At its heart, NZDA is committed to preserving the tradition of recreational hunting and championing the rights of recreational hunters.
12. Key objectives include promoting hunting ethics, endorsing outdoor recreation, and advocating for public access to New Zealand's vast landscapes while fervently opposing commercial exploitation of the nation's wildlife and resources. Conservation is a pivotal pillar.
13. The Association holds introduced game animals in high esteem, not only for their cultural and traditional value but also as vital sources of sustenance.
14. In light of the current cost-of-living crisis and escalating inflation, the ability to harvest game for food offers a significant, sustainable, and economical alternative for many families.
15. These animals, ranging from eight deer species to the Himalayan Tahr, Alpine Chamois, and Feral Goats, are cherished both by NZDA members and the broader New Zealand community.
16. Dwelling predominantly in public conservation land, these animals are legally recognised as a valuable resource.
17. NZDA is staunchly against policies that might limit hunting access or degrade the quality of these herds. The NZDA's interest is in introduced game animals for cultural, traditional and recreational reasons. These reasons include hunting and food gathering. Big game animals are viewed as valued introduced species for our members and the wider hunting public.
18. Those species are all mammals and include eight types of deer – Red, Fallow, Rusa, Sika, Sambar, Whitetail, Wapiti and Moose. Other species are Himalayan Tahr, Alpine Chamois, Wild Boar and

Feral Goats and Sheep. Some species are rare and localised, while others are widely distributed throughout the country. Many of their herds reside or move through public conservation land.

19. These animals are recognised in statute as belonging to the Crown, which, in effect, means they belong to all the people of New Zealand.
20. We fervently oppose policies that will reduce hunting access or which will result in a decrease in the size or quality of the game animal herds.

### **NZDA CULTURE**

21. The NZDA network stretches from Southland to Northland, with branches covering every area in New Zealand.
22. All 49 branches and 12,000 members are stewards of these values and uphold this code of ethics every time they enter our conservation land. They safeguard and defend all New Zealander's access to our land and they are each advocates for such.

### **CONSERVATION ROLE**

23. Beyond hunting, the NZDA has a robust commitment to conservation, with nearly half of its members actively involved in conservational activities every year.
24. Efforts include predator control in many regions and combating plant pests. Furthermore, the Association ensures a balanced coexistence of introduced animals with the native environment.
25. The NZDA posits that outdoor activities, including hunting, lead to greater conservation appreciation. The NZDA believes hunting and other active outdoor recreational pursuits are the path to conservation appreciation.

### **PUBLIC GOOD**

26. The NZDA's impact extends to public welfare through its preservation and development of conservation infrastructure.

27. The combined force of its members alleviates the financial pressures on the Department of Conservation by maintaining huts and tracks within the conservation estate.
28. This initiative not only serves hunters but also benefits the general public, offering safe routes and accommodations in often remote areas.
29. Committed to the belief that New Zealand's natural resources should remain accessible, the NZDA advocates against commercial or private monopolisation of these spaces, ensuring they remain open and cherished by all New Zealanders.

## **NZDA SUBMISSION**

30. Firstly, this is a general submission from the National Association. Any submission by a local NZDA branch should be favoured where there is any contradiction and where any additional detail is provided.
31. Secondly, this submission seeks to provide OSPRI with the views of recreational hunters on OSPRI's planned aerial 1080 operations for 2024. It provides the general views of NZDA and is based on NZDA policy and informed by current game animal management science.

### **IMPACT OF 1080 OPERATIONS ON HUNTERS**

32. NZDA has opposed the indiscriminate use of 1080 since the late 1950s. This position is identified in our policy and annual planning processes. We continue our strong opposition to using 1080, where it can negatively impact recreational hunters and the quality or quantity of game animals and lead to non-target by-kill.
33. NZDA recognises that bovine tuberculosis poses a serious risk to farmed and wild herds and that possum control is required. We also recognise that OSPRI has been given a mandate to use 1080 to control the spread of bovine TB through possums and rabbits, particularly in areas that cannot be controlled using other methods due to challenges such as topography and large possum populations.
34. However, NZDA is concerned that 1080 is still proposed in some areas with little, low or historical bovine TB risk. This poses an undue burden on hunters who cannot harvest meat in areas that have been poisoned for long periods. Moreover, where deer repellent is not used, hunters face low to very low herd numbers for multiple seasons before the population can recover.
35. Hunters are one of the communities that visit the backcountry most often in New Zealand. As such, they frequently encounter various native species in the wild, such as kea and weka. NZDA is

particularly concerned about the risk of using 1080 in areas that have native bird populations that may be affected, such as areas with kea and weka.

36. As aforementioned, the indiscriminate use of 1080 is fervently opposed. We strongly encourage OSPRI to balance the interests of protecting native birds, valued game animals and the interests of hunters and nature-goers with the risk of possum-transmitted bovine TB.
37. Aerial pest control operations using 1080 can risk hunting access rights by killing game animals and/or preventing hunters from taking meat, so the timing of operations can have a significant bearing on whether the hunting community opposes a drop or not. Key times of year to avoid operations are the roar and rut, which covers the months of March, April, May and June, but also, in order for hunters to enjoy hunting during those months, operations cannot happen over the summer months. This means operations for higher recreation value areas should occur in winter and late winter only.

#### GENERAL POLICY ON 1080 OPERATIONS

38. Game animals are classified as valued species within the Biodiversity Strategy 2020, and they cannot legally be targeted through aerial 1080 operations. As such, NZDA policy is that deer repellent should be used on all operations from an animal welfare standpoint and to ensure the 1080 operator does not intentionally, recklessly or negligently kill valued game animals.
39. The timing of 1080 operations should be organised to protect the public interest in accessing public spaces without witnessing dead or dying animals throughout. Therefore, it is NZDA policy and our submission that operations should be undertaken *after* the roar/rut and outside of holiday periods. In general, this means the recommended timeline is between the end of June and the end of August.

## HIGH VALUE HERDS

40. Certain herds of big-game animals have a high value.

41. These herds are, in principle, the following:

41.1. Game animals in Recreational Hunting Areas;

41.2. Game animals located at original liberation sites, which include:

41.2.1. Red deer found in the Rakaia herd of Stoke Park strain;

41.2.2. Red deer found in the Otago herd of Invermark Forest strain;

41.2.3. Red deer known as the Poulter Herd found in the Mount White area, Sumner Forest Park area of Warnham Court strain;

41.2.4. Certain red deer in the lower North Island, known as the Windsor Great Park strain of red deer;

41.2.5. Fallow deer in the Blue Mountains, Caples/Greenstone at Otago/Southland, and the Fallow deer present at the Kaipara, Paparua, and Aniseed Valley herds;

41.2.6. The Rusa herd;

41.2.7. The Sambar herd;

41.2.8. The Sika herd present in the Central North Island;

41.2.9. The Wakatipu Whitetail deer herd found in limited numbers in the Dart and Rees valleys; and the Whitetail deer present on Stewart Island;

41.2.10. The Wapiti herd of Fiordland; and

41.2.11. Deer present near large urban populations of hunters who value those game animals for recreational and food-gathering values.

41.3. Understanding the location and importance of these herds when deciding the nature of a 1080 operation is critical to whether or not the hunting community will strongly oppose an operation or not oppose the operation.

- 41.4. The NZDA would like to see a framework whereby OSPRI incorporates the recreational hunting sector's values into their decision framework without requiring extensive consultation every year. We note that in the 2024 consultation paper, there is no analysis of the game animals present or the value of those herds. We would like to see this done in the future, possibly as a separate annexure.
- 41.5. Proactively timing operations and applying deer-repellent will reduce friction and tension between controlling TB and recreational hunting aspirations and values.

## NORTH ISLAND OPERATION

### 42. *Northern Remutakas*

- 42.1. Firstly, the National Association supports the Wellington branch's and Hutt Valley branch's submissions on this operation. Moreover, we recognise and thank OSPRI for the proactive consultation and engagement with the Wellington branch.
- 42.2. Key submissions follow:
- 42.3. Deer repellent should be applied, with a strong preference for the DOC managed Public Conservation Land and permitted Council hunting areas, because these are highly used recreational hunting areas, with a small population of deer. Maps of these permitted hunting areas are shown in Fig. 1 and Fig. 2 below. The proposed treatment area is also adjacent to a large population of urban hunters and NZDA clubs based in the region, and that must be acknowledged in the decision to include deer repellent.
- 42.4. We further note that this drop needs to be taken into context of the broader ongoing cross-agency 1080 programme that has occurred in the lower North Island in preceding years, where the following areas have already been treated with 1080, mostly without repellent:
- 42.4.1. Southern Remutaka;
  - 42.4.2. Akatarawa Forest;
  - 42.4.3. Southern and Northern Tarauas, including no repellent due to Project Kaka justification, despite high hunter values in the area; and

42.4.4. Aorangis, with repellent, which is an RHA (Recreational Hunting Area).

42.5. NZDA is concerned with this area and strongly submits that deer repellent should be used for this operation and any pre-feed drop. We note that the lower North Island has received a heavy treatment of 1080 by DOC and Ospri and that deer numbers are low and not generally a problem, especially in the areas where recreational hunting is permitted. Such areas subject to this proposed drop, therefore, need to be factored in a decision to include deer repellent. Timing, too, is important to ensure the operation does not clash with key times of use of the areas by hunters: roar period and summer.

42.6. As noted, the drop covers an 'open hunting area' in Remutaka Forest Park and borders directly onto hunting areas in the Regional Council land and Wellington Water catchment land, which is a mix of open and closed recreational hunting. This means the area's recreational and food gathering values are high - Refer to Fig. 1. and Fig 2. which shows the most critical areas.

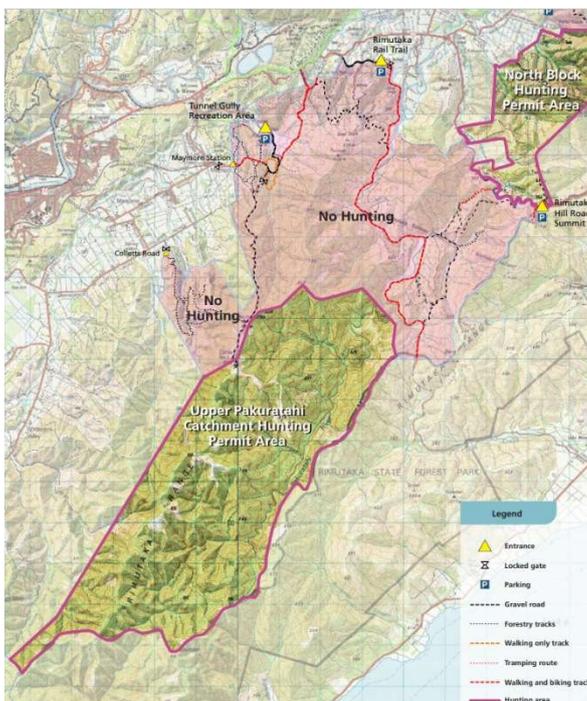


Fig 1: Council Hunting and No Hunting Areas

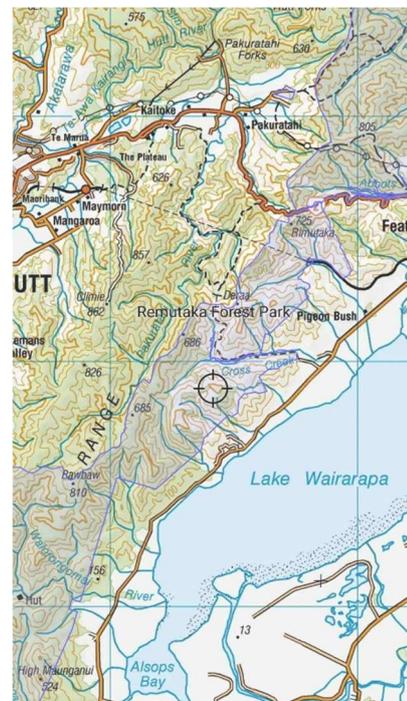


Fig 2. Public Land Open Hunting Area in blue

42.7. In the Greater Wellington Regional Recreational Plan, Toitū Te Whenua Parks Network Plan 2020–30 (the Plan), the Council, in respect to the limited recreational hunting areas available on council-managed land accessible to hunters, takes a balanced approach and supportive approach to hunting and values hunting as low impact with higher benefits than most other activities, stating at it encourages hunting.

42.8. On page 25, the Plan says the following, with the value assessment from Part 4 of the appendices also extracted further below:

|  |  |
|--|--|
| <p><b>Hunting</b></p> <p>Reducing the impacts of introduced pest animals (also referred to as game animals) such as goats, pigs, and deer on the environment through hunting for recreation purposes can be beneficial in some parks.</p> <p>Deer, tahr, chamois and wild pigs, are legally Wild Animals under the Wild Animal Control Act or Game Animals under the Game Animal Council Act. Collectively with other species such as trout, salmon, ducks, pheasants, quail are considered by hunters to be species of recreation hunting value.</p> <p>Hunting organisations identify that the activity can be a gateway to encourage people to contribute to protection</p> | <p>of the habitat through other activities such as predator trapping.</p> <p>Recreational hunting provides an important connection to nature, known as biophilia, encouraging people to engage with the outdoors and learn back country skills.</p> <p>In regional parks the pest/ game species harvested for recreation and food and can provide benefits for broader pest animal control objectives. Hunting activities are managed via permit systems. Public safety is the overarching priority. Safety considerations include public perceptions of safety, proximity to population, recreation trails and activities. Hunting activity areas and periods are defined via the permit system and revised periodically as circumstances change.</p> |
|   |    |

|                               |       | Low -  | Potential IMPACTS on core park values |  | - High                        |                                      |
|-------------------------------|-------|--|---------------------------------------|--|-------------------------------|--------------------------------------|
| BENEFITS for core park values | Low - | <b>LOW-IMPACT, LOW-BENEFIT</b>   | Military training on-off event        | Large-scale film shoot using many vehicles | Car racing event on park road | <b>HIGH-IMPACT, LOW-BENEFIT</b>      |
|                               |       | Less relevant to park locations  |                                       |  |                               | Stock grazing licence                |
|                               |       | Conference events  | Sports fishing competition            | Pop-up vehicle motor show                  | Night time lantern festival   | Off-road motorcycle event            |
|                               |       | Scout jamboree   | Wedding                               | Commercial dog walking                     | One-off rodeo event           | Plantation forestry                  |
|                               |       | Short, small scale film shoot about birds  | Recreation hunting                    | Kiwi spotting event                        | Beehives                      | Large-scale transport museum         |
|                               |       | School cross country run   | Naturalists walk in the park          | Food truck                                 | Drone racing event            | Horse grazing licence (recreation)   |
|                               |       | <b>HIGH-BENEFIT, LOW-IMPACT</b>  | Orienteering event                    | Search and rescue training with helicopter | Large-scale music event       | <b>HIGH-IMPACT, HIGH-BENEFIT</b>     |
|                               |       | Native plant nursery, exercise classes, plein air (outdoor) painting art classes |                                       |  |                               | Large scale, long running film shoot |
|                               |       | High -   |                                       |  |                               |                                      |

42.9. The council’s recreational plan supports the use of deer-repellent, given the status it affords recreational hunting, food gathering, and the views of the local community. The NZDA recently provided extensive input into this plan, which will continue until 2030.

42.10. NZDA notes that it is illegal to target big game animals using aerial 1080 and would be immoral and unethical not to include repellent for this proposed drop.

42.11. Significantly, the area is adjacent to a large urban population and the largest region of members by number of NZDA within the country, including six (6) branches of NZDA. The area is very popular and easily accessible by foot. The local herds move through this area, and any 1080 operation without deer repellent will likely cause unnecessary and inhumane harm to deer and other game animals in the area and significantly negatively affect local hunters.

42.12. NZDA submits that any operation should be scheduled after the roar between the end of June and the beginning of September, as this is the least popular period for hunting.

42.13. Dates for the operation must be after the red deer roar in July or August and should not occur in November and December due to fawn drop and high recreational use, including by walkers and bikers.

42.14. Lastly, and while not directly a concern to NZDA, because recreational hunting is prohibited, we point out that deer repellent should be considered over the entire drop for public safety reasons, ease of application, and operational efficiency. This is because we note that deer killed by 1080 are known to find water and expire in streams; this should be of particular concern to the Council and Wellington Water, given that the water catchment covered by this operation is used by the public. Mitigating dead carcasses falling into waterways can be done using deer repellent. Alternatively, at great expense, people would need to search the entire watercourse to remove dead and rotting carcasses and protect public health.

### SOUTH ISLAND OPERATIONS

#### 43. *West Coast: Buller South, Inangahua, Upper Ahaura Nancy and Hohonu*

43.1. NZDA acknowledges that these areas have had a history of TB infections transmitted from wildlife, particularly possums. We note that there is a need for operations and recognise that past operations in the area successfully reduced TB cases in farmed animals near the range.

43.2. Despite this, NZDA highlights that these areas are important for local and national hunters.

43.3. NZDA submits that, if available and not prejudicial to the use of repellent in the higher priority sites for 2024, deer repellent may be used, or for these operations to be scheduled for late winter to protect the interests of hunters in the roar.

44. *Rainbow (Marlborough); Clarence and Mt Alexander*

- 44.1. NZDA supports the submission of the Marlborough Branch of NZDA. Please refer to that and we recommend a meeting is held with that branch.
- 44.2. It is noted that there are chamois, red deer, goats and pigs in these areas, and local hunters highly value them for both food and trophy hunting opportunities, particularly red deer trophies.
- 44.3. The public land surrounding the Rainbow station, Clarence West and Mt Alexander areas, have extremely high recreational value to local hunters.
- 44.4. NZDA is particularly concerned with the use of 1080 in the Rainbow area. It has an extremely high recreational value and is of national significance with visitors and hunters accessing the Rainbow from across the country. Moreover, Rainbow has already been impacted by 1080 in 2022 when different areas were subject to an aerial 1080 operation. In addition, we are greatly concerned by the potential by-kill of native species, including kea, in this area.
- 44.5. NZDA supports the proposed low-sow rates as appropriate for the environment and supports the continued use of low-sow rates for these operations.
- 44.6. NZDA is particularly concerned by the proposal for an operation along the Clarence River. We note that this is a popular hunting area and affects both the Molesworth Station restricted hunting area and the Ka Whata Tu o Rakihouia/Clarence open hunting area and Marlborough Conservation Land Reserves open hunting areas.
- 44.7. We strongly submit that deer repellent must be used for any proposed operation in this area. Furthermore, we strongly submit that the operation should be scheduled for July or August and that no activities should be undertaken during the public access period (December-Easter) or during the roar.

## **SUBMISSION SUMMARY**

45. In summary, NZDA is concerned that all areas planned for 2024 have a recreational hunting value, unlike previous years' plans. In each case, the proposed areas for aerial 1080 poisoning impose on popular recreational hunting areas and will negatively affect hunting opportunities.
46. NZDA has summarised in Annex A our decision-making framework when making our submissions which is a helpful reference guide to supplement our written submission. Please note that this year, there are no low-priority or tier-3 labelled sites.
47. Our recommendations are based on the principles that:
  - 47.1. OSPRI considers and gives weight to the impact on valued herds when reconsidering the areas, method, and extent of operations.
  - 47.2. Areas with low possum populations or no positive TB cases in the past five years should not be subject to an aerial 1080 operation.
  - 47.3. All areas receive deer repellent, including repellent on pre-feed.
  - 47.4. Low-sow rates are used where appropriate.
  - 47.5. Timing is important, and all operations should be scheduled to begin no earlier than the end of June and end no later than early September.

## ANNEXURE - ANNEX A - Summary Matrix

| District               | Operation             | Includes/Adjacent Public Hunting Area | Game Animals Present | Valued Herd/Historic Trophy Herd | Local NZDA Branch  | Operation Support | Hunter Repellent Priority Level | Recommended Timing     |
|------------------------|-----------------------|---------------------------------------|----------------------|----------------------------------|--|-------------------|---------------------------------|------------------------|
| Wellington / Wairarapa | Northern Remutaka     | Yes                                   | Yes                  | High Value                       | Hutt Valley, Wairarapa, Wellington, Porirua, Kapiti                          | Acknowledged      | 1                               | Winter                 |
| West Coast             | Buller South          | Yes                                   | Yes                  | Valued                           | West Coast, Golden Bay, Nelson, Marlborough, North Canterbury (Christchurch) | Acknowledged      | 2                               | Late Winter            |
| West Coast             | Inangahua West        | Yes                                   | Yes                  | Somewhat Valued                  | West Coast, Golden Bay, Nelson, Marlborough, North Canterbury (Christchurch) | Acknowledged      | 2                               | Late Winter            |
| West Coast             | Upper Ahaura Nancy    | Yes                                   | Yes                  | Valued                           | West Coast, Golden Bay, Nelson, Marlborough, North Canterbury (Christchurch) | Acknowledged      | 2                               | Late Winter            |
| West Coast             | Hohonu                | Yes                                   | Yes                  | Valued                           | West Coast, Golden Bay, Nelson, Marlborough, North Canterbury (Christchurch) | Acknowledged      | 2                               | Late Winter            |
| Kaikoura / North Cant. | Clarence Reserve Nth. | Yes                                   | Yes                  | High Value                       | Marlborough, Nelson, North Canterbury (Christchurch)                         | Acknowledged      | 1                               | Late Autumn and Winter |
| Kaikoura / North Cant. | Clarence West         | Yes                                   | Yes                  | High Value                       | Marlborough, Nelson, North Canterbury (Christchurch)                         | Acknowledged      | 1                               | Late Autumn and Winter |
| Kaikoura / North Cant. | Mt. Alexander         | Yes                                   | Yes                  | High Value                       | Marlborough, Nelson, North Canterbury (Christchurch)                         | Acknowledged      | 1                               | Late Autumn and Winter |