



# NZDA

New Zealand Deerstalkers Association

## TAHR CONTROL OPERATIONAL PLAN 2020/21 CONSULTATION

WRITTEN SUBMISSION TO DEPARTMENT OF  
CONSERVATION

5 August 2020

**To:** Department of Conservation

**Attention:** Tahr Consultation

Ben Reddiex, Director National Operations – Issues &  
Programmes



**Date:** 5 August 2020

Prepared by Gwyn Thurlow and David Keen, NZDA Tahr Liaison Group representatives.

## **NEW ZEALAND DEERSTALKERS ASSOCIATION (NZDA) WRITTEN SUBMISSION REGARDING THE 2020/21 TAHR CONTROL OPERATIONAL PLAN**

This written submission supplements our oral submission given on Monday, 3<sup>rd</sup> August in Christchurch – both forms of our submission have equal weight.

NZDA notes it had pre-prepared to participate in consultation only on the remaining 50% of the 2020/21 operational plan, as the High Court ordered DOC, therefore our preparation and input had reflected that assumption. DOC, however, said at the meeting the entire 2020/21 plan was under review under this consultation process. NZDA noted verbally its concern with this late change in DOC's consultation process. This written submission can apply to the entire 2020/21 operational plan.

Provided with this submission are:

- Copy of the results of NZDA's 'Tahr Hunter Engagement Survey'.
- Extract of Michael Levine's research report 'Himalayan Thar in New Zealand: Issues in Management of an Introduced Mammal' (1985).
- Topographical maps showing Official Control exclusion zones around recreational hunting huts and tracks (handed in hardcopy directly to DOC)<sup>1</sup>.

Capitalised words have the meaning in the material provided by DOC or otherwise defined in this submission and:

**1993 Plan or Policy** means the 1993 Himalayan Thar Control Plan and Policy, respectively.

Our written submissions follow.

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<sup>1</sup> Note: Ben Reddiex gave permission of Gwyn Thurlow to hand deliver hard copies of topographical maps presented in person at the oral submission session.

## WHAT TAHR MEAN TO RECREATIONAL HUNTERS

To recreational hunters, tahr, particularly bull tahr, are highly prized as a trophy big game animal. It is arguable that tahr are now the most important big game trophy in New Zealand to recreational hunters. Tahr are also important as a food source.

NZDA is a significant voice representing recreational hunters in New Zealand. NZDA has 48 branches New Zealand wide, with 10 branches proximate to the tahr herd, being:

- West Coast branch
- North Canterbury branch (Christchurch)
- Malvern branch
- Rakaia branch
- Ashburton branch
- South Canterbury branch (Timaru)
- North Otago branch (Oamaru)
- Palmerston branch
- Upper Clutha branch (Wanaka)
- Southern Lakes branch (Queenstown)

In total NZDA has 8,300 members, plus their families.

Many NZDA branches undertake organised tahr management hunts, including from the North Island. Many of our branches maintain and manage huts and tracks in partnership with DOC in or near the tahr feral range. DOC must therefore acknowledge NZDA's contribution and input into conservation and tahr management and accommodate the members' desire to hunt tahr – the reason the members maintain huts in and near the tahr range.

Every year, each NZDA branch holds an Antler, Horn and Tusk (AHT) competition where tahr feature prominently. The NZDA holds a national competition in July where the best tahr trophies from all branches/members are entered and judged. The winner is awarded the Mount Cook Trophy for best tahr head by size. The tahr award is one of the trophies with the highest number of entries and prestige.

For a bull tahr to reach its trophy potential he needs to reach 7-8 years of age.

In summary, the importance of tahr to NZDA and recreational hunters cannot be overstated.

**Submission:** Bull tahr should not be expressly targeted in Official Control, including in National Parks. The 1993 Plan does not specify the sex of tahr that should or should not be culled by Official Control and so DOC has flexibility in that regard – the overriding imperative is tahr density. The bulls are the draw card for recreational hunters. Removing bulls will mean incidental hunting will not occur which is done when hunters are in areas populated by tahr – i.e. nannies/juveniles, deer and chamois are all harvested by hunters when seeking out bull tahr. Targeted nanny-control by DOC when undertaking Official Control will have a better outcome on tahr herd management and is also a more cost efficient population control method. If tahr numbers are too low, or perceived by recreational hunters to be too



low, then those areas will be avoided by hunters. This will have a net negative environmental outcome and should be avoided by DOC.

**Supporting material** – NZDA has provided the 1985 Levine report extract in relation to recreational tahr hunting as relevant context and support for our submission.

The importance of tahr was acknowledged in 1985 but today, in 2020, the statements need more emphasis because tahr hunting is now more popular and more important to recreational hunters than ever before. Please refer to page 138 of the Levine report regarding “the importance of Himalayan Tahr to Recreational Hunters” – this remains true today.

NZDA would like to see DOC avoid a situation when DOC’s Official Control culls tahr to a level too low that it causes conflict among hunters and between recreational hunters and the commercial tahr hunting sector. Over commercial harvest of tahr was the genesis for the 1993 Plan and Policy.

As at today, there are 54,197 signatures on the Tahr Foundation’s petition<sup>2</sup>. This evidences the relative contemporary importance of tahr hunting. In 1976, the petition delivered to Parliament “Save the Thar” had 12,000 signatures and resulted in the commercial hunting moratorium and the 1993 Policy and Plan<sup>3</sup>.

NZDA has undertaken a survey “NZDA Tahr Hunter Engagement Survey”. It was opened on Sunday, 2<sup>nd</sup> and closed at 5pm on 5<sup>th</sup> August. It has 1,390 responses and asks key questions DOC should already know the answer to but have failed to collate.

A summary of key information that can be gleaned is as follows:

- 71% of respondents hunted tahr in the previous 2 years.
- Only 2% hunt tahr on private land. Underscoring the importance of public land to New Zealand recreational tahr hunters.
- The key motivations to go tahr hunting are:
  - Wilderness experiences – offered only by our National Parks and Wilderness Areas
  - Trophy hunting – evidencing the importance of bull tahr
  - Harvesting meat – showing the importance of tahr as a food resource
  - Health, fitness and well-being – showing the benefits of hunting tahr to people.
- Respondent recreational hunters have indicated conservatively harvesting at least 4,092 tahr in the past 2 years, comprising:
  - at least 1,236 bulls in the past 2 years.
  - at least 2,856 non-bulls in the past 2 years.

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<sup>2</sup> [https://www.change.org/p/department-of-conservation-request-doc-halt-the-2020-21-tahr-cull-and-review-the-himalayan-tahr-control-plan?recruiter=376205408&utm\\_source=share\\_sponsor\\_thank\\_you&utm\\_medium=copylink&fbclid=IwAR0vRPMKOBBrwh7lpQmSpR0scOCSAEicHmlNg4Ebf10K71QNVMI19q6qqAo4](https://www.change.org/p/department-of-conservation-request-doc-halt-the-2020-21-tahr-cull-and-review-the-himalayan-tahr-control-plan?recruiter=376205408&utm_source=share_sponsor_thank_you&utm_medium=copylink&fbclid=IwAR0vRPMKOBBrwh7lpQmSpR0scOCSAEicHmlNg4Ebf10K71QNVMI19q6qqAo4)

<sup>3</sup> See page 134 of the Levine Report.

NZDA notes that DOC should factor this reduction in its population and density analysis when determining Official Control intervention levels for the management units, including for 2020/21.

- Hunters have not adopted the DOC Tahr App, with 87% saying they have not recorded their tahr kills.
- Tahr hunting is done year round, with slightly less emphasis on summer hunting.
- Tahr hunting is mostly done during holidays – long-weekends, public holidays and when taking annual leave from work. This helps DOC decide when to do Official Control to avoid conflict with hunters and ruining their holiday trips.
- Tenting and huts are important to hunters – having access is important. It means DOC needs to keep working with NZDA to maintain huts in the tahr range.

### **NZDA BRANCH AND RECREATIONAL HUNTING AREAS OF IMPORTANCE**

NZDA notes its key stakeholder role in maintaining huts, tracks and working on other volunteering projects in partnership with DOC both in the tahr range and nation-wide.

NZDA carries out this volunteer work in areas of importance to hunting access for its local members. NZDA undertakes alpine hunter training using the huts as their base (i.e. for HUNTS courses) in the tahr range. DOC should seek to encourage NZDA training more tahr hunters and recognise the value of having a motivated and skilling recreational hunting community.

Public land areas are where NZDA members and the majority of recreational hunters hunt tahr. This means DOC must reflect the importance of a reasonable hunt-able tahr herd for recreational hunters' fulfilment in DOC's operational plans.

NZDA presented at the verbal meeting regarding huts, noting where DOC should avoid Official Control to ensure those areas have reasonable tahr for hunting and to reduce conflict with general public and hunters.

In summary, NZDA submits:

- DOC should not carry out Official Control within 3kms of huts, tracks, and landing sites/camps, especially in the East Coast management units and on the West Coast hunter landing sites (Christmas Flat, Horace Walker and Lame Duck huts).
- DOC should expressly not undertake Official Control around NZDA managed huts – NZDA members can do hunter lead control in these areas. DOC should carry out density studies and communicate to NZDA branches how many tahr should be culled in the relevant area. This will require communication and ascertaining target densities. DOC should encourage NZDA's active participation in hunting tahr sustainably and continuing to maintain backcountry huts.

## TIMING OF OFFICAL CONTROL

NZDA submits Official Control should only occur:

- During **late-July**, after the end of the tahr ballot period, **August, September** and **October**.
- Not during long weekends and key holiday periods – i.e. align to when hunting cannot occur in the Fox Glacier Valley and Copland Valley, for example. DOC understands the importance of these times to people use public land and should apply this to tahr hunters.

The above timings should apply to all WARO, AAHT and Official Control concessions/permits. It will mean DOC will cause less direct conflict with recreational hunters.

## USE THE ENTIRE AVAILABLE TAHR BALLOT PERIOD

NZDA submits for the 2020/21 (and all future Operational Plans) that DOC uses the full available 12-week period permitted for landing permits in wilderness areas (known as the tahr ballot). Page 33 of the 1993 Plan contemplates DOC issuing “*landing permits [sic] to operators who wish to land [sic] for up to an annual twelve-week period to run from April till July*”. Currently the ballot period is only 8-9 weeks, however NZDA strongly suggests DOC extends the tahr ballot periods to allow for additional recreational tahr hunter control:

- Last week of April – one week
- May – 4 weeks
- June – 5 weeks
- July – 2 weeks

## PRIORITY OF OFFICAL CONTROL AND PRIORITY AREAS

NZDA submits for the 2020/21 operational period that the plan should be to focus on the exclusion zones (north and south) and tahr known to be outside the feral range, with a particular focus on the south (because of the National Parks located there).

All Official Control should be by heli-operators.

No ground hunters should be used for safety, efficiency and to minimise conflict with recreational hunters (they will come into contact).

Official Control should be described/framed as numbers of tahr targeted, not hours flown.

By reference to the management units, NZDA submits Official Control should happen as follows:

- Outside the range, extensive and sustained.
- Exclusion zones, sustained, with the use of its judas tahr programme
- MU#7, no Official Control. Over culled already.

- MU#6, some Official Control is needed in the inaccessible areas to recreational hunters.
- MU#4, official control should exclude hunter landing site areas and around all huts and tracks (3km buffer).
- MU#2, limited as population is now low, cull certain areas after further liaison.
- MU#5, some Official Control is needed.
- MU#1, limited Official Control, to large mobs and inaccessible areas.
- MU#3, some Official Control is needed in inaccessible areas to recreational hunters.

## **DOC TO REMEDY LACK OF RECREATIONAL HUNTER DATA**

NZDA notes that DOC, the Minister of Conservation, and the Conservation Authority all state (repeatedly) there is a lack of recreational hunter data or accurate data, which it has known for some time, yet DOC has not undertaken any proactive steps to gather that missing data. The lack of data is used to support the statement that recreational hunters are not controlling any tahr – this is not true. DOC has an obligation to survey hunter and hunting organisations. It should do the survey urgently. In the meantime, DOC should use and apply the data in the NZDA survey in the absence of better information.

## **DOC TO UNDERTAKE THE REQUIRED MONITORING**

NZDA submits that DOC should do the data gathering and monitoring, especially of the tahr population this calendar year. Tahr densities and population, including age and sex data, need to be ascertained in management units #1, #2, #3, #5 and #6. These are important units to recreational hunters and require sufficient animal numbers to ensure hunters and their families can enjoy their recreation and put food on the table. This information should be used to assess the effects of Official Control and inform the need for any additional culling in the coming periods. It will also allow population levels to be known and so tahr density and population targets set.

## **TAHR APP**

NZDA supports the Tahr App.

We would like to see it promoted more and the importance of data communicated to recreational hunters. NZDA is happy to promote the Tahr App to its membership, in partnership with DOC.

NZDA submits that DOC may need to hand over the monitoring and branding of the Tahr App to GAC. NZDA suggests that DOC seeks to get a public endorsement of the Tahr App by NZDA, SCI, Tahr Foundation and GAC. And these organisations need to have their logos on the information and promotion of the Tahr App.

The advertising of the App and all flyers have DOC's logo and talks too much about conservation and is not appealing to hunters. The targeting and marketing has been a failure and needs to change.

Making changes would be a positive step for DOC to rebuild the trust of hunters and hunting organisations. It will then allow DOC to receive hunter data.

One submitter each year could win a chosen tahr block and period as a prize for using the App – akin to a ‘Governor’s tag in USA’. It means the hunter gets something in return for their input and effort.

NZDA has been at several meetings where DOC staff have said the App is not working. The App will work, if DOC takes the right approach, as suggested above.

### **DOC-NZDA LIAISON**

NZDA submits that DOC introduces a dedicated tahr liaison staff member, based in an office near the tahr herd, who is mandated to carry out effective recreational hunter and hunter organisation liaison, as contemplated by the Plan. That person needs to understand tahr hunting and manage hunting stakeholders and be willing to work with NZDA branches relevant to the tahr herd and hunter-lead control.



## DOC'S OBLIGATIONS UNDER 1993 PLAN AND POLICY

The NZDA highlights the core obligations and actions under the 1993 Plan and Policy in relation to recreational hunters and hunting organisations<sup>4</sup>. It is NZDA's view that the current 2020/21 Operational Plan fails to reflect all of DOC's obligations and needs revising accordingly.

At the meeting on 3<sup>rd</sup> August, DOC stated the 1993 Plan is the law and binding on it. NZDA would support that statement. Accordingly, NZDA submits that DOC implements NZDA's recommendations/submissions for the 2020/21 operational period and all further periods. We note in the table below the terms of the 1993 Plan and Policy that relate to recreational hunting and hunter lead tahr control and set out our further submissions.

1993 PLAN REFERENCE	EXTRACT OF OBLIGATION/OBJECTIVE	NZDA SUBMISSION
Pg 12 > 3.3 Recreational Hunting	<p>In 1988 approximately 1600 hunting permits were issued by the Department to hunt thar on the conservation estate. This increased in 1991 to over 2000. Nugent (1989) estimated that the total recreational harvest of thar from all land for 1988 was 782. While accurate statistics are not available for pastoral lease land or for that matter the conservation estate (not all hunters provide a return to the Department), it is estimated that the present annual kill by recreational hunters is about 900 per annum, increasing at about 10% per year (Appendix 6). Of this total it is believed that up to 50% is taken from pastoral lease land. Information provided for four properties (Godley Peaks, Erewhon, Mesopotamia and Glentanner), indicates that over 200 thar are taken annually by 500 hunter visits on these stations.</p> <p>Most of the thar taken by recreational hunters are bulls; Challies and Thomson (1989b) found that 75% of the 112 thar taken on conservation estate in the Rangitata catchment in 1988 were bulls.</p>	<p>NZDA requests DOC undertakes a survey to ascertain the 2020/21 recreational hunter use of the conservation estate for tahr hunting. In the meantime, refer to NZDA's survey as an indicative guide. This information is lacking but is highly relevant to tahr management and framing Official Control decisions because it is critical to understand the impact recreational hunters have on the tahr herd.</p> <p>For the 2020/21 operational plan, DOC should factor in the NZDA supplied recreational hunter tahr kill information, in the absence of better data.</p>

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<sup>4</sup> NZDA and its branches, SCI (NZ) and Tahr Foundation.

1993 PLAN REFERENCE	EXTRACT OF OBLIGATION/OBJECTIVE	NZDA SUBMISSION
Pg 22 > Choice of Control Method	<p><b>1.2 CHOICE OF CONTROL METHOD</b></p> <p>The initial choice of control methods set out in the management unit prescriptions reflect land ownership and existing hunting patterns. As already outlined, there appears to be only limited potential for the aerial recovery industry to economically harvest sufficient numbers of tahr from the existing population without making a significant impact on other hunter groups. Commercial operators are likely to be in direct competition, if not conflict, with professional guides and recreational hunters. All of these hunting sectors will probably give the Department control of populations in inaccessible terrain and in terrain where animals are difficult to recover. The present wild animal recovery licencing and permitting systems are managed to minimise conflicts between hunter groups and avoid boom-bust hunting.</p> <p>The Department is seeking to avoid boom-bust fluctuations in animal numbers as such events are intrinsically more difficult to manage. To sustain hunting pressure the Department needs to provide opportunities for all the potential control agents - achievement of such an aim requires a careful balancing exercise between competing demands, and acknowledgement of commercial reality.</p>	<p>NZDA-lead control and recreational hunting should be the primary control method on the East Coast management units where there is easy access and huts, particularly around NZDA managed huts. The 1993 Plan accords 'hunter control' as the primary tool.</p> <p>DOC should provide NZDA with management targets and undertake tahr population monitoring. DOC and NZDA should work in partnership. Targets should be specific for each area and management unit. DOC's targets should be made available and known to all hunters.</p> <p>See also maps supplied. DOC must ensure it minimises conflict with recreationalists, as stated in 1.2.</p>
Pg 32 > 3.3 Control Parameters	<p><b>3.3 CONTROL PARAMETERS</b></p> <p>Several guidelines apply to all management units.</p> <ul style="list-style-type: none"> <li>In management units where recreational hunting has been accorded priority, commercial hunting will be considered only after encouragement has been given to recreational and guided hunters and they have failed to meet targets;</li> <li>In exclusion zones recreational hunting, guided hunting and commercial hunting will be unprofitable as animal numbers will be kept to very low levels. These activities may supplement but not replace official control;</li> </ul>	<p>DOC's operational plans should reflect there is priority of control, as contemplated by the control parameters in the units in the context of intervention densities, accorded to hunters where there is ready access and huts used by recreational hunters, especially huts under management by NZDA branches. See maps supplied. DOC should intervene if tahr densities are in excess of limits or if recreational hunters do not reach a set target of tahr harvested, by unit, for a year. This requires co-operation, monitoring and sharing of information (both ways).</p>

1993 PLAN REFERENCE	EXTRACT OF OBLIGATION/OBJECTIVE	NZDA SUBMISSION
Pg 32 > 3.3 Control Parameters	<p><b>Priority for Control</b>  Priority for the allocation of government funds for tahr control, determined according to the need to stop spread and priorities for protecting conservation values, will be in the following order:</p> <ul style="list-style-type: none"> <li>Southern Exclusion Zone</li> <li>Northern Exclusion Zone</li> <li>Wills/Makarora/Hunter</li> <li>Landsborough</li> <li>Mount Cook/Westland National Parks</li> <li>South Whitcombe/Wanganui/Whataroa</li> <li>Hunter/Ben Ohau</li> <li>South Rakaia/Rangitata</li> <li>Gammack/Two Thumb.</li> </ul>	<p>NZDA submits the 2020/21 operational plan does not match the priority set out in the 1993 Policy and Plan. It should be amended accordingly.</p> <p>DOC should focus on the exclusion zones, tahr outside the feral range and the southern areas where tahr can disperse to additional National Parks (an outcome not acceptable to NZDA).</p> <p>DOC should not do any material Official Control in the East Coast and Northern Units, or the Wilderness Areas – other than ‘hotspots’ provided to DOC by GAC and supported by NZDA.</p> <p>NZDA supports Official Control where tahr are in high density and vegetation damage is known/evidenced to be unacceptable.</p>

1993 PLAN REFERENCE	EXTRACT OF OBLIGATION/OBJECTIVE	NZDA SUBMISSION
Pg 39 > 5. Hunter Management	<p><b>5. HUNTER MANAGEMENT</b></p> <p><b>5.1 RECREATIONAL HUNTERS</b></p> <p>The Department will liaise closely with recreational hunters and hunting organisations to:</p> <ul style="list-style-type: none"> <li>• inform them of localised areas where thar numbers are too high;</li> <li>• keep them informed of management goals and intervention densities applying to management units;</li> <li>• encourage them to take an active role in herd reduction where this is not being undertaken by commercial operations, i.e. by taking female thar in addition to trophy bulls;</li> <li>• require participation in the compilation of statistics by the keeping of detailed hunter diaries and responding to hunter surveys;</li> <li>• inform hunters of results from all parts of the plan implementation.</li> </ul>	<p>NZDA submits that DOC must meet its obligations under Part 5, including for the 2020/21 operational period, and all future operational periods.</p> <p>If DOC cannot do this then it should seek to have GAC undertake this function on its behalf.</p> <p>The GAC was not a statutory body when, in 1993, the plan was created. Therefore, many of DOC's functions should logically be delegated to GAC, which aligns with GAC's core function.</p> <p>In NZDA's view, the hunting community are likely to be more receptive to information sharing with GAC because there is a lack of trust in DOC presently by the hunting community.</p>
Pg 39 > Possible Contractual Agreements	<p><b>Possible Contractual Agreements</b></p> <p>Two areas, the Wanganui/Whataroa and Rakaia/Rangitata catchments, have the greatest recreational hunting popularity. These management units, or sub-units thereof, may be made available to recreational hunters, safari hunters, or similar groups to manage the hunting under a contractual arrangement with the Department, which meets the conservation objectives specified.</p>	<p>NZDA is open to discussion regarding arrangements with DOC.</p> <p>DOC can propose something in this regard and NZDA would constructively work with DOC to reach tahr population density goals in areas managed by NZDA branches.</p>

1993 PLAN REFERENCE	EXTRACT OF OBLIGATION/OBJECTIVE	NZDA SUBMISSION
	<p>The more exclusive the rights in any agreement, the greater the responsibility to control the herd within the parameters of this plan will be expected from the hunting organisation. In line with Departmental aims of keeping land available to as many hunters as possible the Department will ensure that conservation estate is accessible to recreational hunters.</p> <p>Other areas of conservation lands where hunting organisations may be able to make a useful contribution to their control under a contractual arrangement include accessible areas within Mount Cook National Park and the Ben Ohau management unit.</p>	
Pg 43 > Hunter Success Monitoring	<p><b>7.3 HUNTER SUCCESS MONITORING</b></p> <p>Kill data will contribute to monitoring performance and refining population knowledge. The Department will undertake kill monitoring by surveying hunter success.</p>	<p>NZDA is not aware of DOC meeting this obligation.</p> <p>NZDA submits that DOC must undertake this survey for 2019/2020 to ensure it has a complete picture of the role played by recreational hunters and hunting organisations. This will help it develop its operational plan for 2020/21. Surveys should be done annually. As with DOC's hunter liaison obligations, if DOC cannot do this survey it should seek to have GAC undertake this function, and provide sufficient funding for that purpose.</p>

1993 PLAN REFERENCE	EXTRACT OF OBLIGATION/OBJECTIVE	NZDA SUBMISSION
Pg 43 > 8. Control Plan Implementation and Review	<p><b>8. CONTROL PLAN IMPLEMENTATION AND REVIEW</b></p> <p>The Plan spans the whole of New Zealand. Its successful implementation will require a proactive approach and co-operation between the Department, conservation boards and the NZ Conservation Authority and the various interest groups.</p> <p>The Plan will apply for an initial term of five years. It is experimental and changes necessary to protect conservation values will be made when required, including amendments to intervention densities and management unit boundaries should they be justified and feasible. Affected parties will be notified and consulted about any such changes.</p> <p>An operational plan that identifies planned actions for each management unit will be prepared by relevant field centres and subject to annual reporting by July 31 of each year (see Parkes 1993 for format).</p> <p>A summary of the above reports should form the basis of an annual report on plan performance and will be provided to the New Zealand Conservation Authority; the report will include conservation and animal monitoring details, a financial summary and progress on ongoing research (Appendix 8).</p>	<p>Developing each 'operational plan' for each year contemplates a "proactive approach and co-operation" including by DOC with "various interest groups", including NZDA.</p> <p>NZDA would like to see DOC meeting this obligation and reflect the mandated stand of interaction. NZDA contends, agreeing a plan is not about "consultation" it is about working together. NZDA recommends DOC changes its approach so that it working with NZDA, SCI and the Tahr Foundation – with oversight by the GAC.</p> <p>NZDA also submits that DOC should undertake the work to prepare the information required to populate the Appendix 8 report. The report should be shared with hunters and hunting organisations for their information.</p>



1993 PLAN REFERENCE	EXTRACT OF OBLIGATION/OBJECTIVE	NZDA SUBMISSION
Pg 53 > Policy > Implementation	<p><b>IMPLEMENTATION</b> The policy will be implemented in the following manner.</p> <p><b>Thar population control.</b></p> <p>i) Control within the thar's breeding range will be maintained by setting an acceptable level of thar numbers and by applying a number of hunting or control methods to keep numbers within that threshold level. Target population levels will be set in terms of numbers of animals per km<sup>2</sup>. The thar breeding range comprises many ecological associations and land tenures. Accordingly, the target thar density will be set according to the protection needs of each area. A system of land management units will be developed to take account of protection needs and the control goal so that each may be managed as a discrete unit. The target density of thar will thus be variable, from area to area and will range from zero to some high density.</p> <p>The absence of sufficient information on the interaction of thar and their habitat requires caution in setting a maximum number for the whole of the thar breeding range. A number towards the higher end of the habitat's maximum carrying capacity (est. 50,000 assuming no extension of the current range) is known to have unacceptable adverse impacts on vegetation and is not acceptable. The number (est. 5000) achieved by commercial hunting is likely to be impracticable on a sustained basis.</p>	<p>The policy notes that when tahr reach a population of 50,000 it then causes unacceptable adverse impacts.</p> <p>The population is estimated to be now below 30,000 but higher than 10,000.</p> <p>10,000 is the population figure accepted in 1993 as not causing adverse impacts.</p> <p>These numbers suggest that DOC has no imperative to undertake extensive culling during the 2020/21 operational period because tahr are not in excessive numbers.</p> <p>Therefore, NZDA submits:</p> <ul style="list-style-type: none"> <li>• that DOC undertake detailed vegetation and population studies this year.</li> <li>• that DOC can allow a hunter-lead control in most management units.</li> <li>• It focuses on the exclusions zones and outside the feral range.</li> </ul>

1993 PLAN REFERENCE	EXTRACT OF OBLIGATION/OBJECTIVE	NZDA SUBMISSION
	<p>On available evidence a population of not more than 10,000 should not cause unacceptable impacts on vegetation and other natural values, but will provide reasonable hunting opportunities.</p> <p>This number is indicative only at this stage and reliable information is required to establish densities appropriate to each area.</p>	

1993 PLAN REFERENCE	EXTRACT OF OBLIGATION/OBJECTIVE	NZDA SUBMISSION
Pg 54 > Commercial, Recreational and Safari Hunting	<p>Hunting will be accorded priority in bringing about control so as to maintain densities at or below target levels.</p> <p>ii) Recreational hunting groups that can demonstrate their capacity to do so will be offered contractual arrangements with the Department of Conservation under which they will be given encouragement and assistance to remove thar in excess of the target population level. The area or areas to which these arrangements could apply will be carefully selected to ensure the primary purpose of this policy is met. The Department will not be involved in organising or administering recreational hunting, as this will be a role for the contracted hunting groups. The Department will continue to issue permits for hunting thar on conservation lands. A permit fee to cover the administration cost of issue will be charged.</p>	<p>The 1993 Policy accords priority of control to recreational hunting groups.</p> <p>NZDA submits it is willing and able to work with DOC in this regard for the 2020/21 operational period, and all future periods.</p> <p>We initially suggest the relevant areas are those where NZDA branches have huts under management in or near the tahr range and where huts are available for use.</p> <p>DOC will need to set reasonable tahr densities and targets based on outcomes, which should seek to ensure a hunt-able tahr population resource for hunters. This is all by reference to the vegetation around the huts.</p> <p>DOC will need to undertake monitoring around the areas so targets can be adjusted annually.</p> <p>NZDA can then submit its control work data to DOC annually.</p>