To: OSPRI – National TBFree Operations Consultation

Attention: National Aerial Operations Plan 2023

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Date: 28 September 2022

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PRELIMINARY MATTERS

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What are the proposed aerial operation/s you are commenting on?	All of them.				
What is the primary subject of your feedback?	 Timings of proposed operation Boundaries Impact on business or commercial activity General operational concerns Other (please state): 				

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INTRODUCTION

- 1. The New Zealand Deerstalkers Association welcomes the opportunity to submit on the OSPRI National Aerial Operations Plan 2023.
- This submission is made on behalf of over 10,000 members of the New Zealand Deerstalkers Association, our 28,000 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 2023.
- 4. We firmly believe in sound and reasonable conservation policies that support New Zealanders' rights to freely access and enjoy the outdoors and public places. 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 is 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 taking fully into consideration all recreational values while fostering constructive partnerships with landowners and all users, including hunters.

 We present and reflect the views of our 600 committee members, 28,000 supporters, 10,000 members and the 49 incorporated societies they are a part of.

BACKGROUND

- The New Zealand Deerstalkers Association is a voluntary organisation. It has existed for 83 years and was first incorporated in 1939 under the Incorporated Societies Act 1908.
- 10.The NZDA represents more than 10,000 members in 49 branches throughout the country. These branches are in both urban and rural areas.
- 11.It is NZDA policy that the organisation is apolitical.
- 12. The NZDA receives no ongoing public support or funding other than grants from time to time. Its baseline funding is entirely from its membership.
- 13. The NZDA's fundamental purpose is to protect the traditions of recreational hunting while protecting, advancing and advocating for the rights of recreational hunters.
- 14. The organisation's constitutional objectives include upholding hunting ethics, supporting outdoor recreation, championing public access to our mountains, bush and wild country and strenuously opposing commercial exploitation of New Zealand's wildlife, public lands and public and natural resources. Conservation of New Zealand's flora and fauna is a specific constitutional pillar.
- 15.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.

- 16.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 of these species are rare and localised, while others are widely distributed throughout the country. Many of their herds reside or move through public conservation land.
- 17. These animals are recognised in statute as belonging to the Crown, which in effect means they belong to all the people of New Zealand.
- 18.NZDA members, hunters generally and members of the wider public highly value these animals for a variety of reasons. These include the challenge of the hunt, the chance to put food on the table, photographic opportunities, literature and the sheer aesthetic pleasure of viewing wild mammals in the outdoors.
- 19.NZDA members highly value the outdoors and remote places where these animals live for their physical, mental and spiritual health benefits, and the resilience and self-reliance they provide the individual.
- 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.NZDA was established in 1939. It is now an intergenerational community with examples of 3rd and even 4th generation family members.
- 22. The NZDA network stretches from Southland to Northland with branches covering every area in New Zealand.
- 23.The association proudly maintains a strong culture of tradition, integrity, values and ethics; all centred on the protection and free-right to access and enjoy our New Zealand back-country. These values are reflected in our code of ethics and our policies to be read on our website (<u>here</u>).

24.All 49 branches and 10,000 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

- 25.The NZDA is more than just a hunting association. It is actively involved in conservation work and a key organisational and constitutional objective is to foster interest in native flora and fauna and their conservation. At least 45% of all NZDA members engage actively in conservation activities per year.
- 26.This keen interest in New Zealand's unique habitat and species is exemplified by the rediscovery of the takahē by the NZDA's founder.
- 27.NZDA members remain active in conservation efforts to protect indigenous wildlife. This work includes controlling predators in remote areas such as Fiordland with well organised and maintained trapping lines staffed by NZDA volunteers.
- 28.The NZDA is also active in targeting plant pests, including wilding pines with concerted efforts by members on the ground to remove them.
- 29.The NZDA recognises that populations of valued introduced animals must be kept in balance with the many environments they live in. Members volunteer their time, money and effort to managing animal populations on public and private land at no cost to the landowner or public purse.
- 30. The NZDA believes that hunting and other active outdoor recreational pursuits are the path to conservation appreciation.

PUBLIC GOOD

- 31. The NZDA actively contributes to the wider public good through its work preserving, maintaining and constructing conservation estate infrastructure.
- 32. The body of 28,000 NZDA members and supporters maintain huts and tracks within the conservation estate to reduce the financial burden on the Department of Conservation.
- 33. The benefits of this work are enjoyed by the wider public through provision of safe travel routes and secure accommodation, often in remote and testing locations.
- 34.The NZDA is a strong advocate for ensuring New Zealand's mountains, bush and rivers are not locked up by commercial or private capture. This advocacy benefits all New Zealanders who enjoy and value the great outdoors and wild, natural places.

NZDA SUBMISSION

- 35. Firstly, this is a general submission from the National branch. Any submission from a local NZDA branch should be favoured where there is any contradiction and where any additional detail is provided.
- 36. Secondly, this submission seeks to provide OSPRI with the views of recreational hunters on OSPRI's planned aerial 1080 operations for 2023. 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

37. NZDA has opposed the indiscriminate use of 1080 since the late 1950's. This position is identified in our policy and annual planning processes. We continue

our strong opposition to the use of 1080 where it can negatively impact on recreational hunters, the quality or quantity of game animals and lead to nontarget by-kill.

- 38. 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.
- 39. 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 are unable to harvest meat in areas that have been poisoned for long periods of time. Moreover, where deer-repellent is not used, hunters face low to very low herd numbers for multiple seasons before the population can recover.
- 40. Hunters are one of the communities that visit the back-country 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.
- 41. 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.
- 42.Aerial pest control operations using 1080 can risk hunting access rights by killing game animals and/or preventing hunters from taking meat, so timing of

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operations can have a large 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 the 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

- 43. As aforementioned, but equally vital to state again, NZDA is strongly opposed to the indiscriminate use of 1080, particularly where this can negatively impact on game animals and hunters or where it can lead to unintentional by-kill of native species such as kea, weka and kiwi.
- 44.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.
- 45.Furthermore, 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 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 end of August.

HIGH VALUE HERDS

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

47. These herds are in principle the following:

- 47.1. Game animals in Recreational Hunting Areas;
- 47.2. Game animals located at original liberation sites which include:
 - 47.2.1. Red deer found in the Rakaia herd of Stoke Park strain;
 - 47.2.2. Red deer found in the Otago herd of Invermark Forest strain;
 - 47.2.3. Red deer known as the Poulter Herd found in the Mount White area, Sumner Forest Park area of Warnham Court strain;
 - 47.2.4. Certain red deer in the lower North Island known as the Windsor Great Park strain of red deer;
 - 47.2.5. Fallow deer in the Blue Mountains, Caples/Greenstone at Otago/Southland, and the Fallow deer present at the Kaipara, Paparoa, and Aniseed Valley herds;
 - 47.2.6. The Rusa herd;
 - 47.2.7. The Sambar herd;
 - 47.2.8. The Sika herd present in the Central North Island;
 - 47.2.9. The Wakatipu Whitetail deer herd found in limited numbers in the Dart and Rees valleys; and the Whitetail deer present on Stewart Island;
 - 47.2.10. The Wapiti herd of Fiordland; and
 - 47.2.11. Deer present near large urban populations of hunters who value those game animals for recreational and food-gathering values.
- 47.3. 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 oppose an operation or not oppose the operation.

- 47.4. The NZDA would like to see a framework whereby OSPRI incorporates the recreational hunting sector's values into their decision framework without the need for extensive consultation every year.
- 47.5. Pro-actively timing operations and applying deer-repellent will reduce friction and tension between controlling TB and recreational hunting aspirations and values.

NORTH ISLAND OPERATIONS

48.Coach Road

- 48.1. Coach Road covers an area of private land that is not directly adjacent to any public hunting blocks. It is a large, forested area and is adjacent to the Mohaka River. This is an area of relatively low interest to NZDA as it does not directly affect the nearby publicly accessible herds that inhabit the Mohaka region. This is an example of what NZDA would describe as "land-locked".
- 48.2. Notwithstanding, NZDA recommends the use of deer repellent for this operation to avoid unintended by-kill of valuable game animals and to prevent inhumane deaths by poison.
- 48.3. Although this area covers predominantly private land, the herd in the Mohaka River is a valuable resource for local hunters and should be protected from the risks of 1080 due to animal-welfare concerns and due to the risk to nearby Sika herds. The people mostly affected by this would be the adjacent land-owners, their friends and family, and the hunters they allow to pass through their land to hunt the game animals living there. Their right to hunt those game animals should be protected.
- 48.4. Moreover, we submit that the operation should be scheduled for between the end of June and beginning of September.

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49.Maungataniwha

- 49.1. NZDA is particularly concerned with this area and strongly submits that deer repellent should be used for this operation and any pre-feed drop.
- 49.2. This area covers an open hunting area in Te Urewera and borders directly onto hunting areas in the Whirinaki forest park. Although the area is not 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 will have a significant negative affect on local hunters.
- 49.3. Furthermore, any operation should be scheduled after the roar between the end of June and beginning of September as this is the least popular period for hunting.

50.Waitara

- 50.1. NZDA is concerned about the use of 1080 in this area. Although there is bovine TB in the area, wide-spread possum control is not required due to low population levels. The purpose of an aerial 1080 operation is to significantly reduce possum populations to prevent the spread of bovine TB. Where the cause of transmission is intra-herd or from large animals such as pigs, the use of 1080 is unethical and unwarranted.
- 50.2. NZDA submits that this operation should not be undertaken until further evidence arises as to the cause of the new TB infection. Particularly, there needs to be more extensive trapping to gather data on the population and distribution of possum populations. It is unethical to blanket an area in 1080 for the purpose of TB prevention when there is insufficient data to suggest that the operation will be successful. For example, in the event that the operation is undertaken, it is possible that further TB cases arise

as the operator has targeted the incorrect areas of land. Alternatively, the cause of the infection could equally be intra-herd or from a non-possum species, in which case the application of 1080 was unnecessary. Given the value of the Sika herd in the Mohaka River as well as the valued red deer and pigs, it is submitted the operator should undertake further research before continuing the operation.

- 50.3. In the event that the operator does not accept our first submission, we strongly submit that deer repellent should be applied to this operation to protect the Mohaka River herds and to better guarantee the local deer will be unaffected.
- 50.4. Moreover, we submit that the operation, if continued, should be scheduled for between the end of June and beginning of September as this is the least popular period for hunting.
- 51.Rangipo
 - 51.1. Although NZDA is not particularly concerned with this area due to it being primarily on NZ Defence Force land, we are concerned that 1080 should not be used in areas with little to no exposure or risk to bovine tuberculosis. This is not a farmed area but there are native animals, Sika and Red deer and the Kaimanawa heritage horses that will be affected by this operation.
 - 51.2. We therefore submit that this area should not be subject to a 1080 operation.
 - 51.3. However, in the event that an operation is carried out, due to the border to Sika hunting areas, we submit that deer repellent should be used. Our recommended dates for the operation would be after the Sika rut in July or August.

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SOUTH ISLAND OPERATIONS

52. Rainbow Station (Marlborough)

- 52.1. NZDA is particularly concerned with the use of 1080 in the rainbow station. 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 Station has already been impacted by 1080 last year 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.
- 52.2. We strongly submit that no operation should be undertaken across the Rainbow station. In the event that an operation is undertaken, we propose that the areas affected be limited to those that cannot reasonably be accessed on foot.
 - 52.2.1. The proposed area covers the Rainbow Road itself and the major rivers and creeks on the road side of the St Arnaud and Raglan ranges. These are some of the most accessible hunting areas on the Rainbow station. Moreover, many of these areas are accessible by foot or 4WD vehicle and have huts that are accessible. We submit that the operation should be limited to only one side of the river. We recommend that the St Arnaud side be excluded from the drop due to the likely impact on deer herds in the Nelson National Park as well as the Rainbow conservation area.
- 52.3. 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

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should be undertaken during the public access period (December-Easter) or during the roar.

53.Clarence Reserve South

- 53.1. NZDA is particularly concerned by the proposal for an operation along the Clarence River. 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. There are chamois, red deer, goats and pigs in this area and they are highly valued by local hunters.
- 53.2. Moreover, the area has a "clear herd status" for bovine TB and there is only a residual possum population. NZDA is unclear on why an aerial operation in this area is warranted as opposed to land-based options or more restricted and targeted aerial application at most. Given that the operation intends to "ensure the disease cycle ... is broken", we contend that land-based 1080, Cyanide and trapping is better suited for that purpose rather than wide-scale aerial application.
- 53.3. Notwithstanding, in the event that our proposal is not accepted, 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.

54.Karamea

54.1. NZDA is particularly concerned with the proposed area for this operation. The proposed area falls completely within an open hunting area with access to red deer, chamois, goats and pigs. Moreover it borders Kahurangi National Park which recently saw three Takahē killed following a 1080 drop. Kahurangi and the Buller-Kawatiri holds some of the most diverse forested areas in New Zealand and the areas affected by the

proposal are of national significance to hunters and the wider public in general.

- 54.2. It is highly likely that a 1080 operation in this area will significantly affect West Coast hunters who take red deer and pigs from this area as well as New Zealand hunters in general who take chamois from this area.
- 54.3. The use of 1080 in the Karamea thus poses a great risk to hunting interests and will restrict locals from gathering food for a significant period of time as well as limit the local tourist economy which depends on hunters visiting the area for chamois and other game animals. Moreover, it may impact negatively on native birds such as kea who inhabit the neighbouring areas.
- 54.4. NZDA recognises that the spread of TB has decreased and the number of cases reduced following the last aerial operation in this area. We acknowledge that OSPRI intends to complete this operation as part of their five year plan. However, NZDA also strongly submits that following this operation and in the future, OSPRI should seek to manage possum populations using other methods such as trapping to allow hunters to access this area more effectively going forward.
- 54.5. As such, NZDA submits that it is essential that deer repellent is used in this area and that the operation should only be undertaken in August to not affect the roar as well as chamois hunting opportunities.

55.Karnbach Poerua

55.1. NZDA is particularly concerned with this area, particularly the area near the Willberg Range that borders the Adams Wilderness Area. The proposed operation will likely affect tahr, red deer, goat and chamois hunters. It is also a nationally significant location given its status as a wilderness area. As such it is imperative that repellent be applied to any and all aerial drops made during this operation.

- 55.2. Therefore it is submitted that deer repellent should be applied to this operation. Any use of deer repellent should also be informed by the kea protection research being undertaken in Arthur's Pass to protect kea populations. NZDA submits that herbivore and avian repellents should be applied.
- 55.3. Furthermore, the operation should be undertaken in August where possible to lessen the impact on hunters seeking red deer during the roar and tahr and chamois during their rut.

56.Paparoa Range

- 56.1. NZDA acknowledges that the Paparoa Range has had a history of TB infections transmitted from wildlife, particularly possums. We note that there was an operation five years ago and recognise that it was successful at reducing TB cases in farmed animals near the range.
- 56.2. Despite this, NZDA highlights that the Paparoa Range is an important hunting area for local and national hunters. The proposed area affects hunting in the Paparoa National Park, Paparoa Wilderness Area and Saxton Ecological Area, and covers the Greymouth-Mawheranui Open Area Hunting Zone. This area contains a Fallow Deer herd of historical significance and we are very concerned about the impact on that herd's ongoing existence given the number of operations undertaken in the area with no deer repellent applied and Fallow's high vulnerability to 1080 programmes when repellent is not used.

56.3. NZDA submits that deer repellent should be used for this operation and that it should be scheduled for late winter to protect the interests of hunters in the roar and hunters seeking a chamois with their winter coat.

57.Whitcombe/Mungo-Newton Range

- 57.1. NZDA is extremely concerned with the proposed operation in the Whitcombe/Mungo-Newton Range due to the likely impact on the iconic Rakaia red deer herd, amongst one of the most highly valued and sought after herds of deer in New Zealand.
- 57.2. Coupled with the iconic and valued trophy herd status of the Rakaia herd of red deer present in the operation area, the area is also an extremely popular location for recreation sports generally including tramping and camping.
- 57.3. Moreover, we are aware that there is little scientific and data-driven basis for a 1080 aerial operation in the area as TB is not generally present in the area and the operation has been triggered by historical data and weak presence of TB in a possum. A ground operation is significantly more appropriate in this circumstance paired with extensive trapping and a limited use of aerially applied toxin in inaccessible areas adjacent to farmland where a TB transmission risk is still perceived to exist.
- 57.4. Furthermore, as the highest priority area for hunters out of all of the proposed 2023 operations, it is essential that, should the operation proceed, any and all poison applied to this area includes deer repellent.
- 57.5. We appreciate the work that OSPRI put in with the Marlborough NZDA branch regarding the Molesworth operations and we note that the hunting community's reaction to a 1080 operation on the Rakaia herd may even exceed the reaction caused by the operation in the Molesworth.

- 57.6. The by-kill of even a single trophy deer from this herd is unacceptable and will likely lead to greater tension between the hunting community and OSPRI for the foreseeable future.
- 57.7. NZDA strongly recommends:
 - 57.7.1. OSPRI considers cancelling this proposed drop;
 - 57.7.2. If the operation cannot be cancelled, changing the method to ground-control;
 - 57.7.3. If the above are not possible, and the use of aerially applied 1080 for this operation is required, then repellent is applied.
 - 57.7.4. Irrespective of which of the above three options is progressed, OSPRI together with the relevant organisations and stakeholders should undertake research and data-gathering in the area to determine appropriate TB control methods, in line with the risk to farming herds and considering the significant value of the game-animals present. The ultimate goal of this research would be to conclude that TB control is no longer needed in the area occupied by the Rakaia strain red deer herd.

East Hāwea

- 57.8. Firstly, the National Association supports the Upper Clutha branch submission on this operation. Moreover, we recognise and thank OSPRI for the extensive consultation and engagement with the Upper Clutha branch.
- 57.9. The NZDA is concerned with the application of 1080 to this area given its significant recreational value to hunters. We oppose the use of poison where there is a potential for by-kill of valued game animals, particularly deer.

- 57.10. East Hāwea is an easily accessible hunting area near Wanaka, Queenstown and Central Otago generally. It is a popular area for a variety of recreation sports and is accessed by trampers, hunters and campers regularly. It is an area frequently used for food-gathering and importantly is also home to the valued Invermark Forest strain red deer herd known as "The Otago Herd" that has inhabited the area since its release in 1871.
- 57.11. NZDA submits that deer repellent must be applied to any poison or pre-feed pellets in the area to best protect the interests of local hunters, prevent inhumane non-target by-kill and ensure recreational and food-gathering interests are safeguarded.
- 57.12. Moreover, we submit that any operation should be scheduled for winter and must avoid the roar period to allow hunters to make the most of summer and autumn hunting opportunities.
- 58. Timaru Creek
 - 58.1. NZDA's submission on Timaru Creek repeats our views on the proposed East Hāwea operation. First, we support the Upper Clutha branch submission and recognise the work that OSPRI has done with the branch to engage and consult with local hunters.
 - 58.2. Notwithstanding, as above, we are concerned with the application of 1080 to an area of significant recreational value to local hunters. The bykill of no-target species, particularly deer, leads to inhumane and useless killing of valued species that should be kept available for recreational foodgathering and hunting in line with the categorisation of deer under the Aotearoa New Zealand Biodiversity Strategy and Te Ara Ki Mua frameworks as valued introduced species.

- 58.3. Timaru Creek is home to the valued Invermark Forest strain red deer herd known as "The Otago Herd" and must be protected to ensure the quality of game animals in the area can continue. It is in the interests of maintaining good working relationships with hunters to apply deer repellent to any and all poison and pre-feed in the area.
- 58.4. NZDA submits that deer repellent must be applied to any poison or pre-feed pellets in the area to best protect the interests of local hunters, prevent inhumane non-target by-kill and ensure recreational and food-gathering interests are safeguarded.
- 58.5. Moreover, we submit that any operation should be scheduled for winter and must avoid the roar period to allow hunters to gather food and access the local herds in summer and autumn.
- 59.Shannon
 - *59.1.* The Shannon area is of low concern to NZDA given it not being public land and not being near or in a hunting area. Moreover, there are no herds in this area of interest to the NZDA.

CONCLUSION

- 60. In conclusion, NZDA is concerned that many of the proposed areas for aerial 1080 poisoning impose on popular recreational hunting areas and will negatively affect hunting opportunities.
- 61. We are concerned that areas with no positive TB cases, such as the Clarence Reserve and the Whitcombe/Mungo-Newton Range, are still being targeted without sound justification.

- 62. NZDA has summarised in Annex A our decision-making framework when making our submissions which we hope is a helpful reference guide to supplement our written submission.
- 63. Our recommendations are based on the principles that:
 - 63.1. OSPRI considers and gives weight to the impact on valued herds when reconsidering the areas, method, and extent of operations.
 - 63.2. Areas with low possum populations or that have no positive TB cases in the past five years should not be subject to an aerial 1080 operation.
 - 63.3. All areas receive deer repellent, including repellent on pre-feed.
 - 63.4. 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 (1 = higher, 2 = med, 3 = lower)	Recommended Timing
					Wairoa, Napier,			
Wairoa	Coach Road	No	Yes	Lower Value	Hastings	Acknowledged	3	Neutral
Wairoa	Maungataniwha	Yes	Yes	High Value	Wairoa, Napier, Hastings	Acknowledged	1	Winter
Hastings	Waitara	Yes	Yes	Lower Value	Wairoa, Napier, Hastings	Acknowledged	3	Winter
Taupo	Rangipo	Yes	Yes	Lower Value	Taupo, Central King Country, Taihape	Acknowledged	3	Neutral
Marlborough	Rainbow	Yes	Yes	High Value	Marlborough, Nelson	Opposed	1	Winter
Kaikoura	Clarence Reserve South	Yes	Yes	High Value	Marlborough, Nelson	Opposed	1	Winter
Buller	Karamea	Yes	Yes	Lower Value	West Coast	Acknowledged	2	Late Winter
Westland	Karnbach Poerua	Yes	Yes	Lower Value	West Coast	Acknowledged	1	Late Winter
Buller	Paparoa	Yes	Yes	Valued	West Coast	Acknowledged	2	Late Winter
Westland	Whitcombe/Mungo - Newton Range	Yes	Yes	High Value	All South Island Branches	Opposed	1	Winter
Queenstown- Lakes	East Hāwea	Yes	Yes	High Value	Upper Clutha, Southern Lakes	Acknowledged	1	Winter
Queenstown- Lakes	Timaru Creek	Yes	Yes	High Value	Upper Clutha, Southern Lakes	Acknowledged	1	Winter
Dunedin	Shannon	No	Yes	Lower Value	Otago	Supported	3	Neutral