

To: OSPRI – National TBFree Operations Consultation

Attention: National Aerial Operations Plan 2027

By Email: consultation@ospri.co.nz

By Mail: PO Box 3412, Wellington 6140



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Prepared by Gwyn Thurlow, Chief Executive and General Counsel

PRELIMINARY MATTERS

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Area of Interest	Recreational Hunting, Shooting and Conservation
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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): <i>Use of deer repellent</i>

INTRODUCTION

1. The New Zealand Deerstalkers Association welcomes the opportunity to submit on the OSPRI National Aerial Operations Plan 2027.
2. This submission is made on behalf of approximately 14,000 New Zealand Deerstalkers Association members, our 40,000 supporters and the estimated 85,000 recreational big-game hunters in New Zealand.

NZDA SUBMISSION

3. 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.
4. Secondly, this submission seeks to provide OSPRI with the views of recreational hunters on OSPRI's planned aerial 1080 operations for 2027. It provides the general views of NZDA and is based on NZDA policy.
5. NZDA supports the positions of the GAC and, in relation to the Central North Island operations affecting the Sika Herd of Special Interest, the Sika Foundation.
6. The New Zealand Deerstalkers Association supports the goal of eradicating bovine tuberculosis from New Zealand and recognises that effective possum control is an important part of that programme.
7. NZDA's principal concern in the 2027 Plan is the proposed Kaweka East and Kaweka South operations and their interaction with the newly designated Sika Herd of Special Interest (Sika HOSI).
8. NZDA supports the submission of the New Zealand Game Animal Council (GAC) in relation to these operations and supports the continued direct involvement of the Central North Island Sika Foundation in operational planning.

9. The context has materially changed from previous OSPRI consultations. The Central North Island Sika HOSI was formally announced in July 2026. It will be subject to a statutory herd-management framework, with the GAC having delegated management functions and operational delivery supported by the Sika Foundation.
10. Kaweka East is entirely within the Sika HOSI. The northern part of Kaweka South also overlaps the HOSI, while the two-kilometre wild-meat caution buffer will affect additional HOSI management units. This means the proposed operations are not simply occurring in areas where deer happen to be present; they directly affect an area established under statute for active management of a highly valued game-animal herd.
11. NZDA acknowledges the TB risk OSPRI is seeking to address and the evidence that TB associated with the western Kaweka Range has spread east into surrounding livestock herds. We also acknowledge the practical difficulty of achieving effective possum control across steep and remote terrain.
12. However, those disease-control objectives should be achieved in a way that gives proper effect to the Sika HOSI and minimises avoidable effects on the herd, hunting and wild-meat harvesting.

Deer repellent

13. NZDA strongly supports OSPRI's proposal to use deer repellent throughout Kaweka East, including in both pre-feed and toxic bait.
14. NZDA also supports the GAC's position that deer repellent should be used throughout all parts of Kaweka South that overlap the Sika HOSI or are within two kilometres of it. OSPRI should actively work with affected landowners to obtain agreement for the use of deer repellent in those areas.
15. The evidence for doing so is strong. OSPRI's 2022 Kaweka trial recorded no sika deer by-kill within the Prodeer treatment area while effective possum control was maintained. Where a proven mitigation measure is available within a statutory HOSI, its use should be the default.

Operational boundaries and the two-kilometre buffer

16. NZDA asks OSPRI to consider whether parts of the proposed operational footprint within the Sika HOSI can be excluded, reduced, or treated through effective ground or alternative methods without compromising the TB-eradication objective.
17. Particular attention should be given to the two-kilometre wild-meat caution buffer. The practical impact of an aerial operation extends beyond the mapped treatment boundary because deer harvested within the treatment area and applicable buffer cannot be taken for human consumption for four months.
18. OSPRI should therefore take the resulting two-kilometre impact area into account when fixing final operational boundaries, particularly where it would unnecessarily extend restrictions into the adjoining Sika HOSI.

Timing

19. NZDA supports undertaking the Kaweka operations outside the principal sika rut and periods of highest hunter use. We acknowledge OSPRI's proposed timing of Kaweka East from June and Kaweka South from July.
20. However, final timing should also take account of the four-month wild-meat caution period. Avoiding the roar does not remove the effect on hunters if a subsequent four-month restriction significantly limits spring wild-meat harvesting and interferes with recreational harvest as a management tool.
21. NZDA therefore supports the GAC's request that final dates be developed with the GAC and Sika Foundation having regard to both peak hunting periods and the downstream wild-meat restriction.

Lowest effective sowing rate

22. NZDA supports the deliberately low sowing rates proposed by OSPRI and requests use of the lowest sowing rate capable of delivering the required possum-control outcome.

Monitoring

23. NZDA requests that OSPRI works with the GAC to undertake post-operation monitoring of both sika by-kill and possum-control efficacy. Results should be provided to the hunting community, DOC and NZDA so they can inform ongoing adaptive management of the Sika HOSI and apply learnings to future TB-control and wider 1080 drop decisions, i.e. PF2050.

Other 2027 operations

24. NZDA's principal concern is Kaweka East and Kaweka South. However, Kokomoka–Takahiapo, Willow Flat–Waitara Valley, Clear Stream and Benmore also affect land containing game animals and used for recreational hunting.
25. NZDA requests where possible that deer repellent should be used where deer are likely to be exposed; sowing rates should be kept to the lowest effective level; timing should minimise impacts during periods of high hunter use; and ground or other non-aerial methods should continue to be considered wherever they can achieve the required outcome.
26. NZDA supports the proposed July timing for Willow Flat–Waitara Valley. We ask OSPRI to consider whether the proposed May timing for Clear Stream and Benmore can reasonably be moved later into winter.

Conclusion

27. NZDA acknowledges the progress OSPRI has made in recognising hunting values and incorporating measures such as deer repellent, lower sowing rates and appropriate timing.

28. The establishment of the Sika HOSI now provides an opportunity to formalise that approach. NZDA supports the GAC submission and asks OSPRI to work directly with the GAC and Sika Foundation before finalising Kaweka East and Kaweka South.

29. In particular, NZDA seeks:

- deer repellent throughout Kaweka East and throughout all parts of Kaweka South that overlap or are within two kilometres of the Sika HOSI;
- active engagement with affected landowners to enable that use of repellent;
- reconsideration of operational boundaries, including the practical effect of the two-kilometre wild-meat caution buffer;
- the lowest effective sowing rates;
- timing developed with the GAC and Sika Foundation having regard to the sika rut, peak hunter use and four-month wild-meat restriction;
- monitoring of sika by-kill and possum-control efficacy; and
- a long-term landscape-scale strategy intended to achieve durable TB control and minimise the need for repeated aerial toxin operations within the Sika HOSI.

30. These measures would allow OSPRI to pursue the TB-eradication objective while properly recognising and protecting the statutory game-animal management regime now operating in the Kaweka Range.

GENERAL POLICY ON 1080 OPERATIONS

31. 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.

32. The timing of 1080 operations should be organised to protect the public interest in accessing public spaces without witnessing dead or dying animals throughout.

33. 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

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

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

35.1. Game animals in Recreational Hunting Areas;

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

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

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

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

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

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

35.2.6. The Rusa herd;

35.2.7. The Sambar herd;

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

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

35.2.10. The Wapiti herd of Fiordland; and

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

35.3. 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.