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31 July 2019

Director National Operations – Issues & Programmes  
Department of Conservation  
Wellington Office

By Email: [REDACTED]

Dear Dr Reddiex

### **SUBMISSION ON 2020/2021 TAHR OPERATIONAL PLAN**

1. Following recent correspondence we submit on the 2020/2021 Tahr Operational Plan.
2. As a preliminary comment, we support the Department in ramping up its control efforts and ceasing the practice of not targeting bull tahr in national parks. We see these as positive steps.
3. We are also generally supportive of the operational plan. Our main comments relate to the:
  - a. use of helicopter hours as the measure of effort.
  - b. absence of a plan to achieve the control plan numbers.

### **USE OF HOURS AS THE MEASURE OF EFFORT**

4. We remain troubled by the use of helicopter hours as the sole measure of effort. While we understand the difficulty that flows from the absence of accurate tahr numbers, we think the plan goes too far in relying solely on hours of control as the measure of effort.
5. Our view is that the control plan refers to tahr numbers and so should the operational plan.
6. The importance of numbers was evident in the recent High Court case taken by the Tahr Foundation. Despite the 2019/2020 plan referring to hours of control as the measure of effort, the parties were constantly referring to the numbers that would be controlled, and used a rule of thumb of 30 tahr per hour of control.
7. The use of such a rule of thumb is undesirable as the actual numbers controlled will vary across the feral range and the use of rule of thumb is likely to result in inaccuracies.
8. In order to address this concern, we seek that the hours of control be supplemented with a target number of tahr to be controlled in the assigned hours of control. This would provide greater transparency and give an idea, even if just estimated, about how the control is achieving the intervention densities. We understand that DOC has made or could make such estimate that could be included in the plan.

## **ABSENCE OF A PLAN TO ACHIEVE THE CONTROL PLAN NUMBERS**

9. Another issue that has troubled us for some time is the absence of a long term plan to achieve the control plan requirements (e.g. overall population, intervention densities and control parameters).
10. Tahr numbers have got out of control because of a sustained failure to undertake the required control.
11. DOC has constantly indicated that it needs time to undertake the control work that is necessary to achieve the control plan numbers. However, despite resuming control efforts more than two years ago, no detail has been provided about how and when the control plan will be achieved.
12. The absence of a long term plan is undesirable as it creates uncertainty for all stakeholders. We consider that a plan that sets out how the control parameters will be met needs to be completed as a matter of priority.

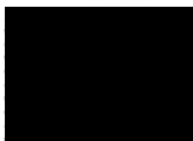
## **RECOMMENDATION FOR REMAINING HOURS OF EFFORT**

13. Focus on national parks and getting numbers down as far as practicable and then focus on the two wilderness areas, the Hooker, Landsborough and the Adams.

## **CONCLUSION**

14. The 2020/2021 operational plan is a significant improvement from previous years and we generally support it. However, there are a couple of issues that need to be addressed before we can fully support it, in particular:
  - a. the addition of a targeted number of tahr to be controlled in each management unit; and
  - b. a commitment to a long term plan to achieve the control plan requirements.
15. We look forward to discussing this further on Monday.

Yours sincerely,



Royal Forest and Bird Protection Society of New Zealand Inc.





# 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 [REDACTED], 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 [REDACTED] 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=copypink&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=copypink&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 OFFICIAL 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 OFFICIAL 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 thar 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>

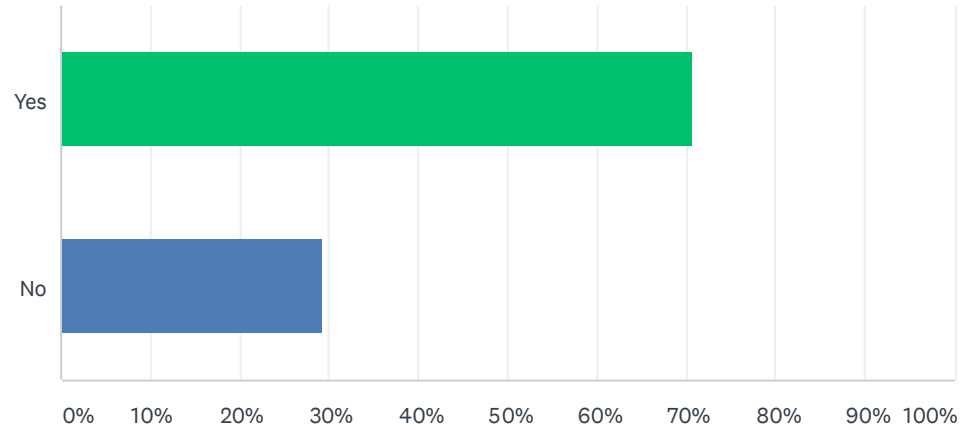
1993 PLAN REFERENCE	EXTRACT OF OBLIGATION/OBJECTIVE	NZDA SUBMISSION
Pg 53 > Policy > Implementation	<p><b>IMPLEMENTATION</b> The policy will be implemented in the following manner.</p> <p><b>Thar population control</b></p> <p>i) Control within the thar's breeding range will be maintained by setting an 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
<p>Pg 54 &gt; Commercial, Recreational and Safari Hunting</p>	<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>

## Q1 Have you hunted tahr in the previous 2 years?

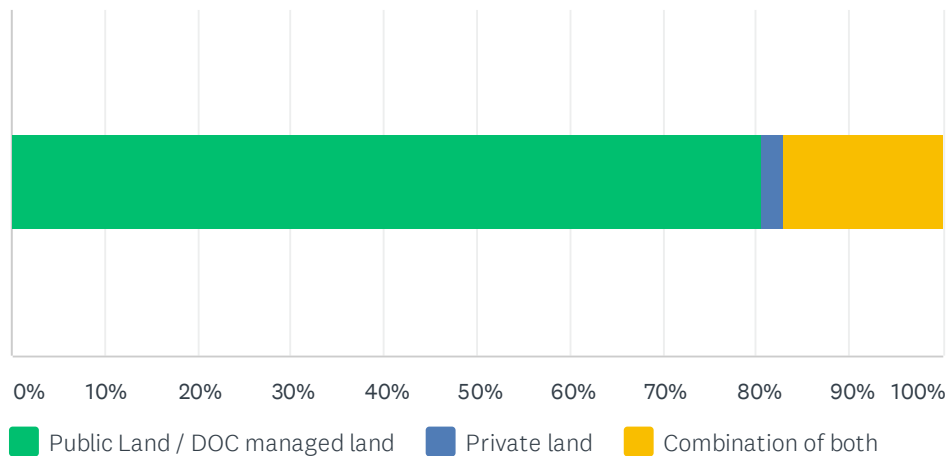
Answered: 1,390 Skipped: 4



ANSWER CHOICES	RESPONSES	
Yes	70.79%	984
No	29.21%	406
TOTAL		1,390

## Q2 Where/how do you undertake your tahr hunting?

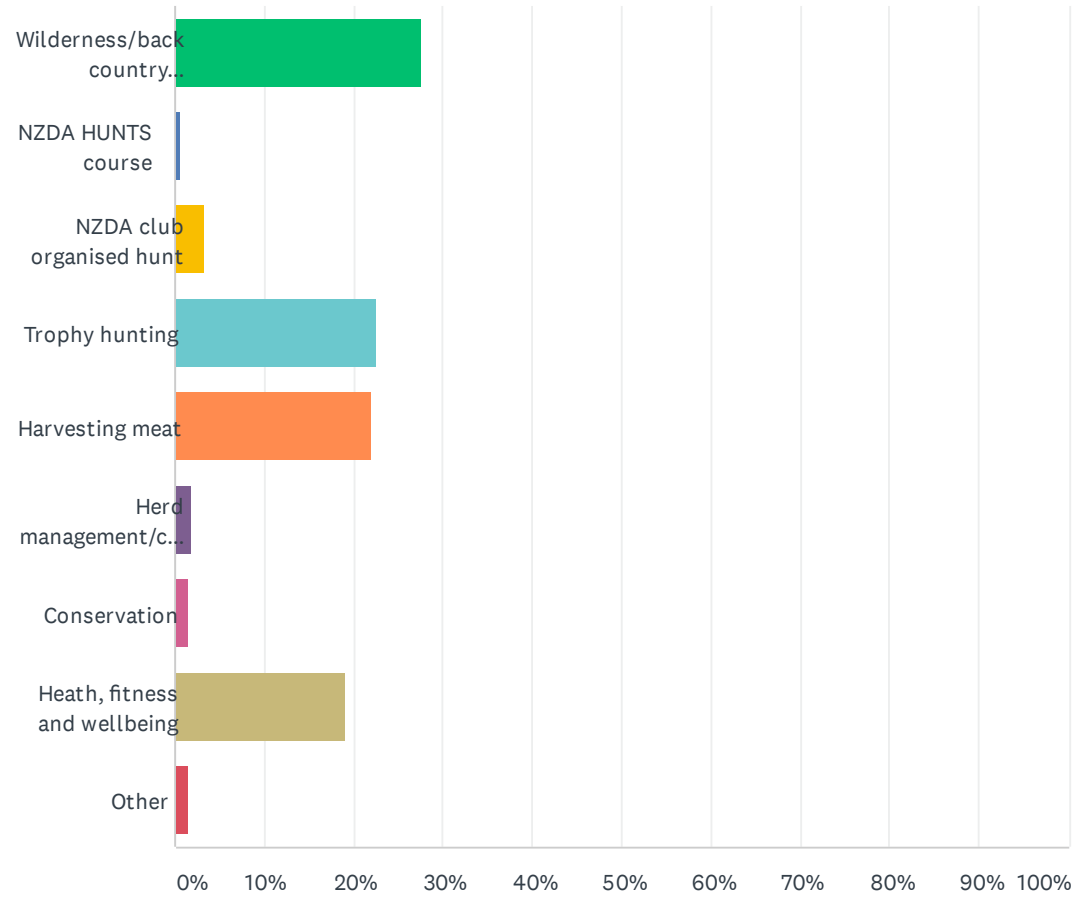
Answered: 1,376 Skipped: 18



ANSWER CHOICES	RESPONSES	
Public Land / DOC managed land	80.52%	1,108
Private land	2.47%	34
Combination of both	17.01%	234
<b>TOTAL</b>		<b>1,376</b>

### Q3 What is your main motivation/reason to go tahr hunting?

Answered: 1,385 Skipped: 9



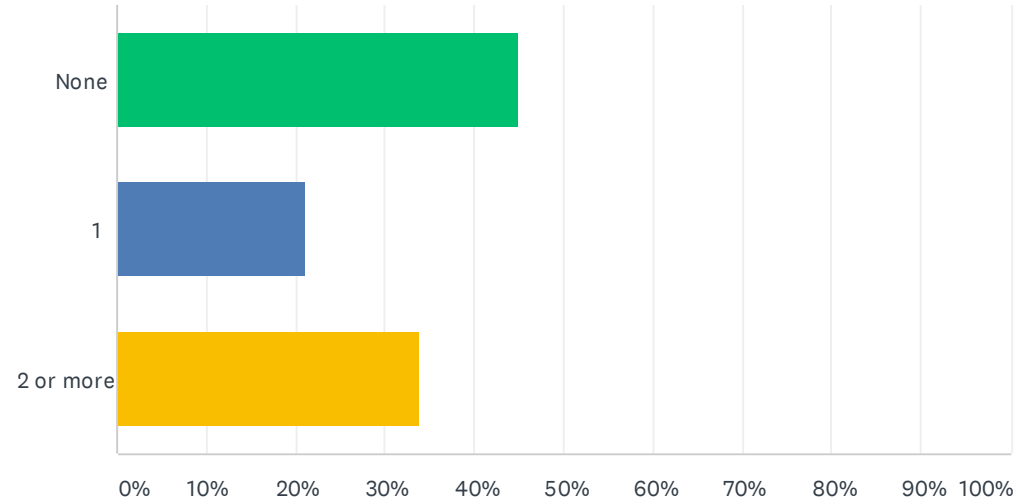
## NZDA Tahr Hunter Engagement Survey

ANSWER CHOICES	RESPONSES	
Wilderness/backcountry missions	27.65%	383
NZDA HUNTS course	0.58%	8
NZDA club organised hunt	3.32%	46
Trophy hunting	22.53%	312
Harvesting meat	22.02%	305
Herd management/culls	1.95%	27
Conservation	1.52%	21
Heath, fitness and wellbeing	19.06%	264
Other	1.37%	19
<b>TOTAL</b>		<b>1,385</b>



## Q4 In the past 2 years how many bulls have you shot?

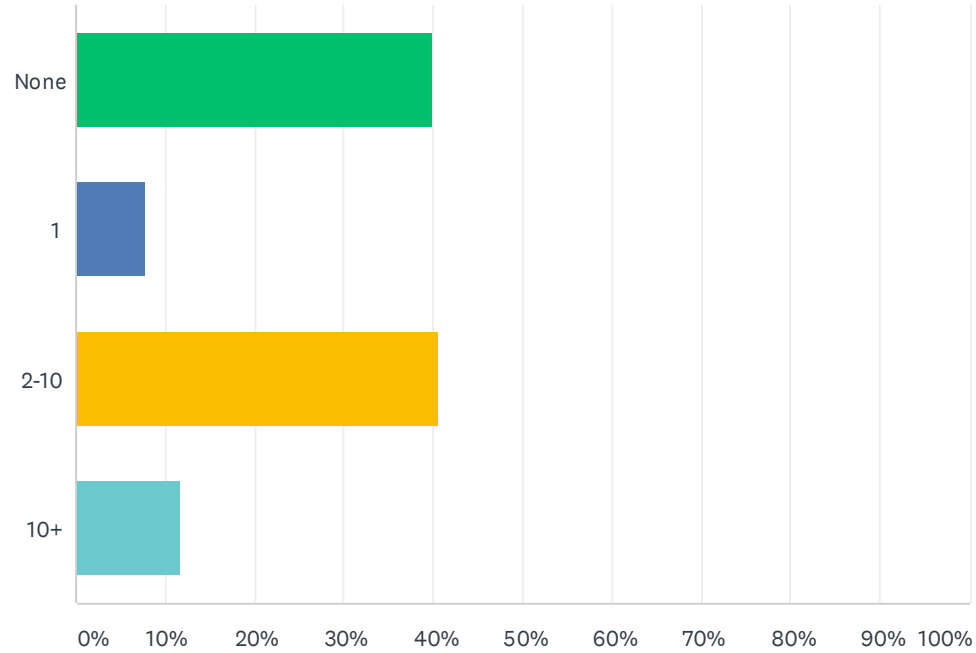
Answered: 1,391 Skipped: 3



ANSWER CHOICES	RESPONSES	
None	45.00%	626
1	21.14%	294
2 or more	33.86%	471
<b>TOTAL</b>		<b>1,391</b>

### Q5 In the past 2 years how many nannies/kids/juvenile bulls have you shot?

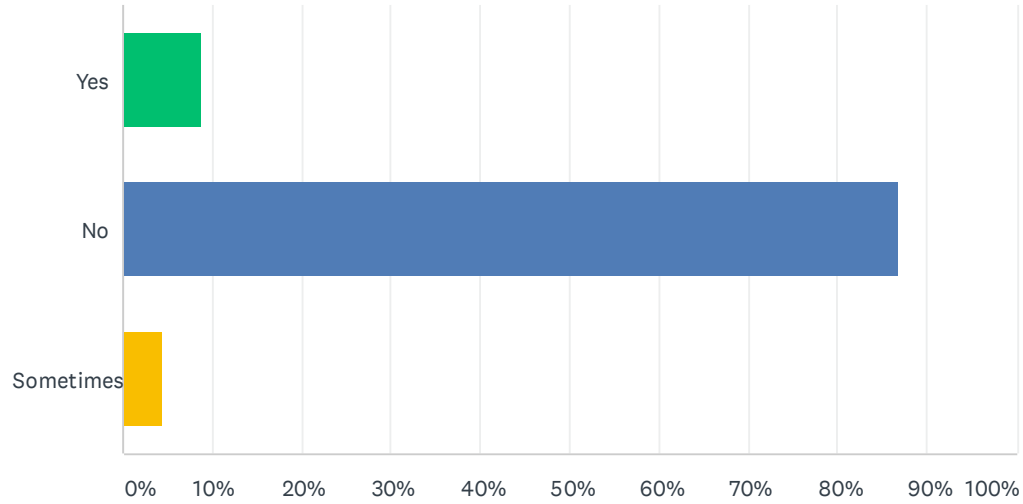
Answered: 1,389 Skipped: 5



ANSWER CHOICES	RESPONSES	
None	39.96%	555
1	7.78%	108
2-10	40.60%	564
10+	11.66%	162
<b>TOTAL</b>		<b>1,389</b>

## Q6 Have you used the Tahr App to report your tahr kills?

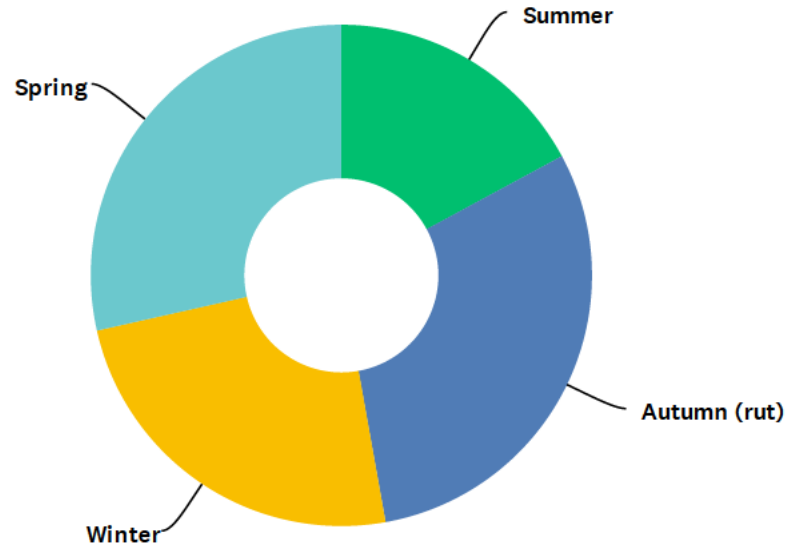
Answered: 1,389 Skipped: 5



ANSWER CHOICES	RESPONSES	
Yes	8.71%	121
No	86.90%	1,207
Sometimes	4.39%	61
<b>TOTAL</b>		<b>1,389</b>

### Q7 What time of year do you typically hunt for tahr?:

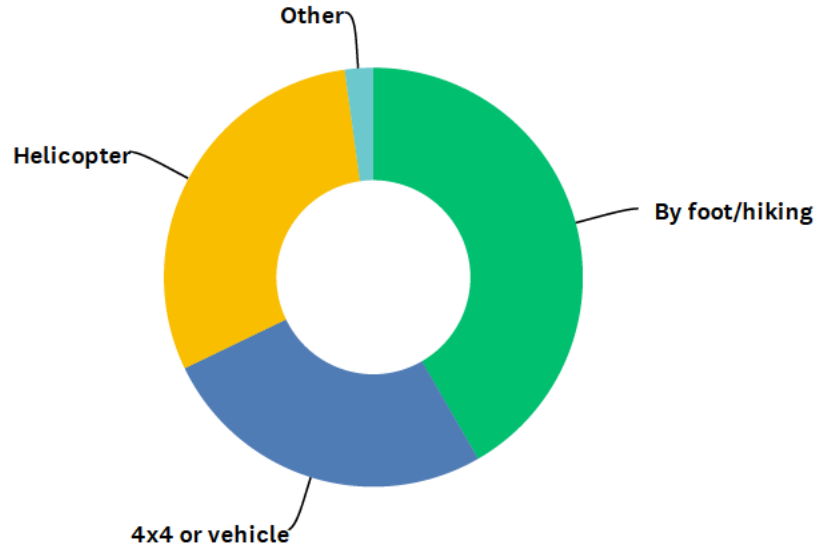
Answered: 1,367 Skipped: 27



ANSWER CHOICES	RESPONSES	
Summer	17.12%	234
Autumn (rut)	30.07%	411
Winter	24.29%	332
Spring	28.53%	390
TOTAL		1,367

## Q8 How did you access your hunting location(s)

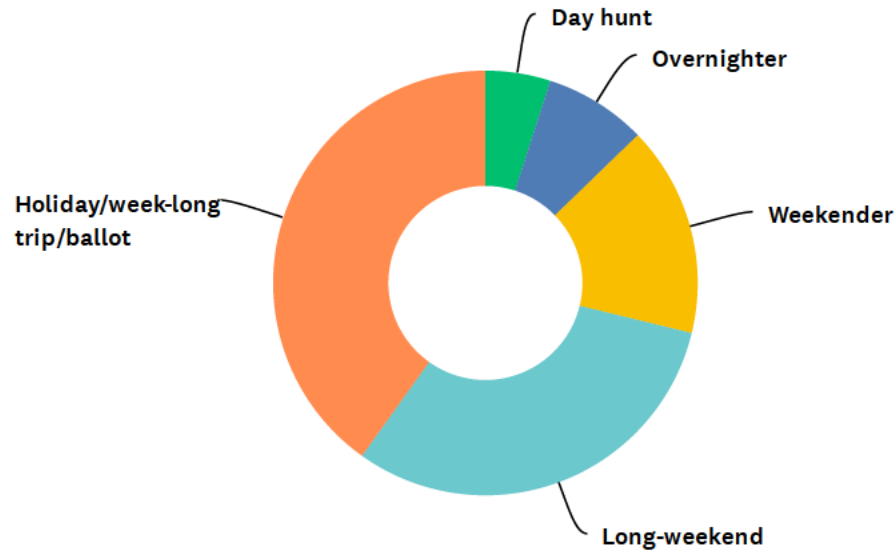
Answered: 1,375 Skipped: 19



ANSWER CHOICES	RESPONSES	
By foot/hiking	41.67%	573
4x4 or vehicle	26.18%	360
Helicopter	29.96%	412
Other	2.18%	30
<b>TOTAL</b>		<b>1,375</b>

### Q9 What is the average duration of your tahr hunting trips?

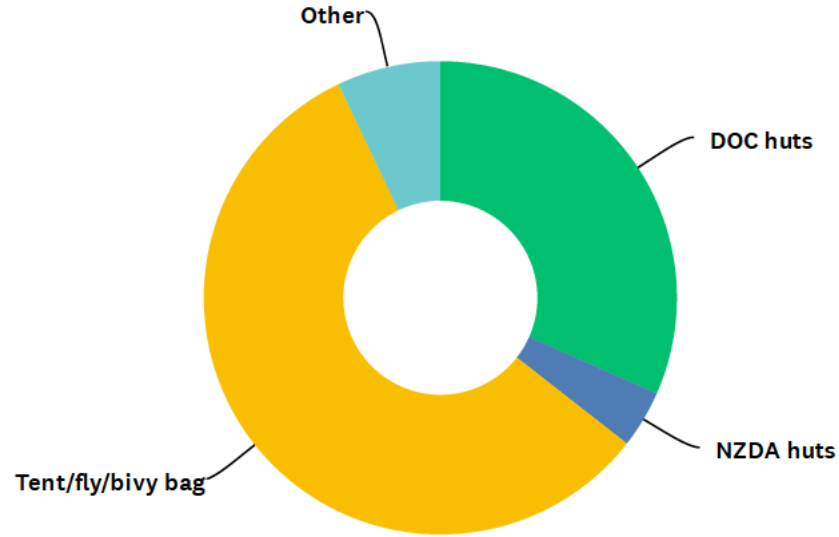
Answered: 1,371 Skipped: 23



ANSWER CHOICES	RESPONSES	
Day hunt	4.96%	68
Overnighter	7.80%	107
Weekender	16.05%	220
Long-weekend	31.07%	426
Holiday/week-long trip/ballot	40.12%	550
TOTAL		1,371

## Q10 When hunting tahr what shelter do you use?

Answered: 1,372 Skipped: 22



ANSWER CHOICES	RESPONSES	
DOC huts	31.63%	434
NZDA huts	3.94%	54
Tent/fly/bivy bag	57.36%	787
Other	7.07%	97
<b>TOTAL</b>		<b>1,372</b>

F. 01

HIMALAYAN THAR IN NEW ZEALAND:  
ISSUES IN MANAGEMENT OF AN INTRODUCED MAMMAL

Michael Jesse Levine

Report presented in partial fulfilment of the  
degree of Master of Science in Resource Management

Centre for Resource Management  
University of Canterbury  
Christchurch, New Zealand

1985



### 7.2.7. Recreational Hunters

Recreational hunters have traditionally been one of the largest back country user groups in N.Z. Numerically, they are certainly the largest of thar user groups. The following discussion is centered on the views of the New Zealand Deerstalkers Association Inc. (NZDA). Although it is acknowledged that only a small proportion of recreational hunters in N.Z. are affiliated with this or any other hunting organization (see below) it is assumed here that the views of the NZDA with respect to Himalayan thar reflect those of recreational hunters at large. A discussion of recreational hunting in general and the specific role thar play in this activity follows a summary of the NZDA position.

The NZDA has long expressed interest in recreational hunting of Himalayan thar. For example, the first scientific research on this species in N.Z. was undertaken by members of the Big Game Research Committee of this organization (Anderson and Henderson, 1961). NZDA interest in thar culminated in the "Save the Thar" campaign and the resultant petition, presented to the Land and Agriculture Committee of Parliament in 1976. The petition, containing 12,000 signatures, called for retention of a herd of Himalayan thar for recreational purposes (see 1.3). In September 1982 a more specific proposal for establishment of a RHA for thar in the mid-Southern Alps was prepared and sent to the National Recreational Hunting Advisory Committee for consideration. The present views of the NZDA with respect to Himalayan thar, details of the RHA proposal, and aspirations for the future management of this species were expressed in a statement presented by Mr. K. Schasching at the public meeting held in Wellington October 2, 1984 (See 6.3.3 ). The main points are summarized below:

#### 1) Present Views

- It is acknowledged that thar in large numbers do unacceptable damage to vegetation, and soil and water values. However,
- within the constraints of environmental carrying capacity it is thought that thar can and should be

managed as a recreational resource. This was expressed by one hunter interviewed as a desire for "healthy animals in a healthy environment". (Hois, pers. comm., 1984).

- Present population densities are considered too low to adequately meet the needs of recreational hunters.

## 2) The RHA Proposal

Essentially two RHAs have been proposed in the mid-Southern Alps, one on each side of the main divide. The proposals call for large RHAs so that low population densities can be maintained to accommodate soil and water conservation objectives.

The eastern proposal includes all state forest and UCL in the headwaters of the Rangitata Catchment, i.e. the catchments of the three main tributaries, the Havelock, Clyde and Lawrence Rivers. Also included is that portion of the Rakaia R. catchment south of Cattle Stream.

The western proposal concerns state forest and UCL in the headwaters of the Wanganui River (i.e. including the Evans, Lord and Lambert tributaries) and extends further south to the Perth River.

The eastern proposal abuts pastoral leasehold to the east and Mt. Cook National Park in the south. The southern extension of the western proposal also approaches the boundaries of Mt. Cook National Park.

## 3) Future Thar Management

- a) *Continue the present moratorium on the commercial hunting of thar for a further 5 years; while at the same time,*
- b) *Have the New Zealand forest service vigorously control thar in and immediately adjacent to Mt. Cook National Park, and Westland National Park, and at the northern and southern ends of their range with the objective of eliminating them from these areas; and concurrently,*
- c) *Have the New Zealand forest service undertake a large scale investigation into the feasibility of managing thar for*

*recreational hunting at densities above those attainable in control operations.*

#### 4) Recreational Hunting in New Zealand: Background Information.

Hunters are amongst the least studied recreational groups in N.Z. (Simmons and Devlin, 1983); in particular, little is known about recreational hunting of Himalayan thar. A full scale examination of recreational hunting in N.Z. is beyond the scope of this report. Unfortunately, this has not been undertaken elsewhere. In the following discussion, relevant aspects of recreational hunting in general are outlined, and the interest of recreational hunters in thar specifically is addressed in greater detail. Information is drawn principally from an interview of 6 thar hunters which was conducted for the purpose of this study, the literature review and discussion of recreational hunting by Aukerman and Davison (1980), and a regional study of recreational hunting in Lake Sumner forest park (North Canterbury) by Simmons and Devlin (1983).

In their study of the mountain land recreationalist, Aukerman and Davison (1980) suggest that recreational hunting fulfills several needs of participants. These are:

- *To meet the challenge of a demanding environment,*
- *To prove hunting skill and self sufficiency,*
- *To leave the city and get back to nature,*
- *To see animals in the wild,*
- *To relax, and enjoy the companionship of fellow hunters.*

Only a small proportion of recreational hunters belong to hunting organizations (Aukerman and Davison, 1980; Simmons and Devlin, 1983). The NZDA is the largest such organization with a current membership of 4,600. The only other organization catering to the needs of thar hunters is the Big Game Hunters' Association. Unfortunately, no membership figures were available for this association, but it is known to be much smaller than the NZDA. The total number of recreational hunters in New Zealand has never been accurately assessed. Robb and Howarth (1977) indicate that



PHOTO: M.J. Levine

FIGURE 18: Recreational Hunters - off to pursue thar in Carney's Creek, Havelock Valley

approximately 2.4 percent of the New Zealand public (i.e. ~72,000 people) considered hunting one of their three most favoured forms of recreation. However, the number of active participants is not necessarily an accurate measure of societal interest in recreational hunting. One of the consequences of commercial depletion of wild animals in recent years has been a "rapid and phenomenal decrease in the numbers going into the mountains for recreational hunting.. Large numbers no longer hunt because there is nothing to hunt. Those who still hunt make trips less frequently" (Aukerman and Davison, 1980). This trend is borne out by membership figures for the NZDA. In 1960, membership stood at 9,200; by 1984 national membership had fallen by 50 percent to 4,600 (Grant pers. comm., 1984). Because this decline in recreational hunting is due in large measure to the destruction of its resource base, potential interest in the activity is likely to be far greater than present participation indicates. For example, the recent user survey of Lake Sumner forest park, showed that of those individuals who had never hunted (58.5 percent of the total sample), approximately 37 percent were interested in trying this activity (Simmons and Devlin, 1983).

Demographic characteristics of hunters indicate that they are a distinct category of back country user. The sport is overwhelmingly male dominated and hunters are drawn predominantly from the 20-30 age group. As a group, hunters are more likely to continue with their sport into later life than trampers, and in terms of general education and occupation, hunters appear to be more representative of N.Z. society as a whole than other back country users (Simmons and Devlin, 1983).

##### 5) The Importance of Himalayan Thar to Recreational Hunters.

A group interview conducted with six recreational hunters from Christchurch provided some information on the importance of Himalayan thar as a recreational species. All were NZDA members selected because of their strong interest in thar hunting. Nonetheless, all hunted a wide variety of other species as well. The group indicated that there are five

characteristics of thar hunting which make it particularly rewarding:

- 1) Thar live in the "most beautiful country" in N.Z.
- 2) The hunter must work hard to obtain an animal.
- 3) It is possible to hunt thar with a companion - this often is not the case when deerstalking in dense bush.
- 4) Thar provide a unique and desirable trophy.
- 5) To some degree the scarcity of animals itself has given rise to greater recreational interest.\* Although all agreed animals were far too scarce at the present time.

The group considered that perhaps 10 percent of recreational hunters pursued thar regularly. This is roughly in agreement with the findings of Simmons and Devlin (1983); 6.1 percent of hunters surveyed in Lake Sumner forest park indicated thar were their first or second choice species. In addition, forty percent of hunters surveyed in the park indicated that they had hunted thar in the past. Simmons and Devlin (1983) conclude that hunters tend to seek a variety of hunting experiences as well as developing favourite species. It should also be noted that thar are not found within the Lake Sumner forest park. A possible consequence of this is that hunters who are particularly interested in thar were under-represented in the sample.

The thar hunters indicated that a variety of factors have influenced the popularity of Himalayan thar amongst hunters. These are:

- i) Information - In the past, e.g. early 1960s, many hunters were unaware of the existence of thar. At present, hunters are more aware of thar as a game species. Many, however, are unsure whether any thar remain, and if so, where and how they may be pursued. With the scarcity of animals, hunters who know of rewarding areas (very few for thar) are unwilling to share this information. Some hunters took the view that the Forest Service should take a more active role

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\* Unfortunately, the many possible reasons for this were not explored.

in alerting recreationalists to the presence of animals.

ii) Access, and difficulty of hunting terrain -

In the past, the remoteness of thar habitat was the major difficulty in hunting this species. Long treks with heavy packs were required to reach hunting areas. Similarly, the difficulty of the terrain thar inhabit called for better equipment than most hunters had. Today access and terrain still pose difficulties. However, with improvements in technology (e.g. 4 wheel drive vehicles, better rifles, light tramping equipment etc.) they have become less formidable obstacles to the hunter. Still, many will seek easier game far closer to home.

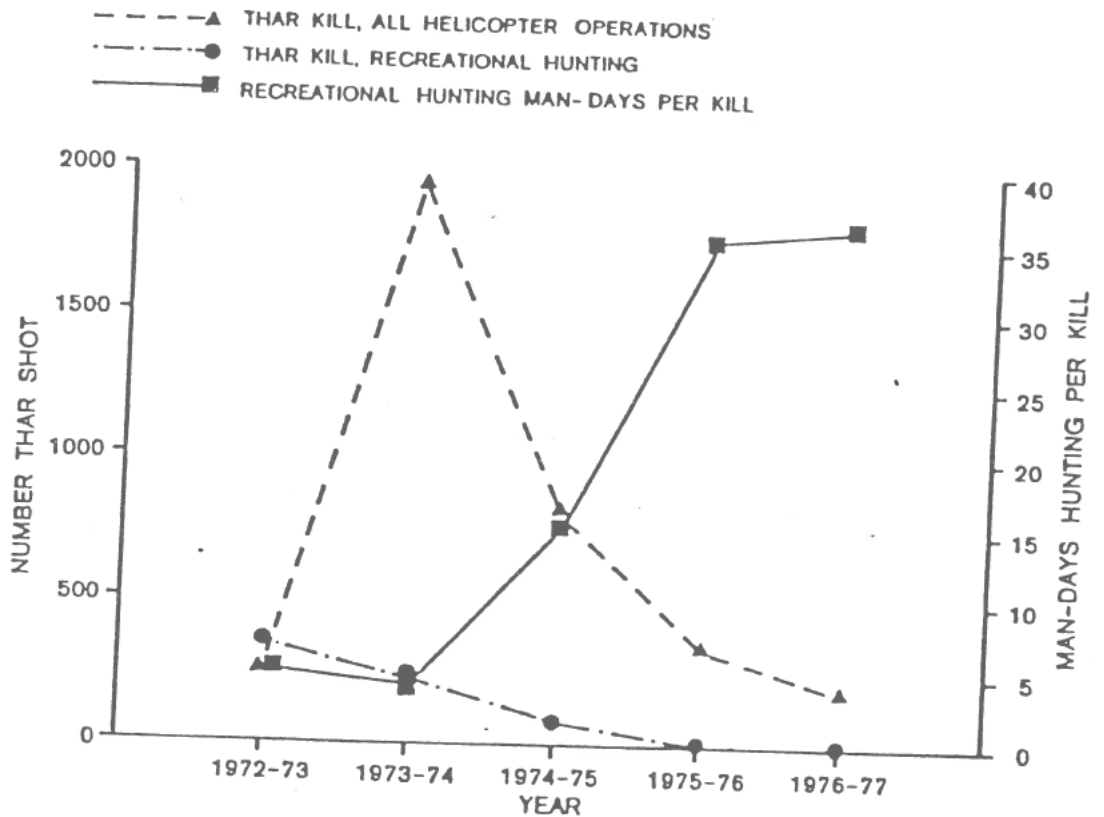
iii) Changes in hunting objectives - Prior to the boom in commercial hunting during the 1960s, game was freely available in accessible country throughout N.2. Many hunters simply "shot for the pot", and many measured their hunting success by the number of animals killed. Abundant game in accessible areas meant there was no need to journey to the high mountain lands for sport. This approach to hunting is no longer feasible given the relative scarcity of wild animals today. Hunters indicated that scarcity has increased interest in trophy hunting, and conservation of remaining stocks amongst recreational hunters. On the other hand, hunters indicated that deerstalkers had little incentive to restrain themselves when animals they spared were likely to be taken by commercial or Forest Service hunters. It was acknowledged that some indiscriminate shooting of wild animals continues.

The central issue for recreationalists was clear. They felt there were too few thar to meet their needs. They stressed they do not advocate a return to peak population levels. "We don't want animals in great mobs like they used to be - no one would want that. We want our bush, we want our mountain-tops in good shape, but we also want animals" (Hois, pers. comm. 1984). Thar hunters

stressed the need for greater animal numbers, to make hunting worthwhile at present, and to ensure retention of animals for the benefit of future generations.

The decline in the success rate of recreational thar hunters since the early 1970s has been well documented.

FIGURE 19: Thar kills from Mt. Cook National Park and Recreational Hunting Success, 1972-1977.



From Tustin, 1980

Figure 19 shows the tremendous increase in man-days per recreational thar kill which followed commercial helicopter hunting and government control operations in Mt. Cook National Park. This is indicative of the trend throughout thar habitat.

TABLE 11: Recreational Hunting Success Statistics for Himalayan Thar, 1978-1980

Years	% Hunters saw no animals	% Hunters killed no animals	% Hunters killed at least one animal	% Hunters very successful, 10+ animals killed
1978-1980	40.9	61.5	38.5	4.1



Table 11 shows the level of success during the period 1978-1980 amongst thar hunters surveyed by Simmons and Devlin (1983). Simmons and Devlin also found that questionnaire data from "hunters who have subsequently given up the sport indicate that 80 percent had withdrawn from the sport within two years of their last 'successful' trip and a further 11 percent had withdrawn in the following two year period". On this basis over 60 percent of thar hunters surveyed would have been in this "at risk" category in 1980 (Simmons and Devlin, 1983). This lends substance to thar hunters' expressed concern that continued low population levels will lead to further attrition of the ranks of sportsmen.

Thar hunters interviewed saw the solution to the problems described as the imposition of some form of game management for thar in some portion of their habitat. First and foremost they expressed a desire to see official recognition of the resource values of the animal; equally important was the desire to see maintenance of larger populations to improve hunting success. With respect to management practices, the following specific points were noted:

- Excessive populations could always be culled through helicopter hunting.
- Animals removed could help pay for the costs of control.
- Recreational hunters would be willing to pay for use of managed thar populations, providing the cost was reasonable, and if 'hunnable' thar populations could be maintained under the management regime.
- Fees collected could pay for periodic control operations. Hunters felt that this system could be abused, but would be preferable to having nothing to hunt.

These views are consistent with those expressed in general terms by recreational hunters cited by Aukerman and Davison (1980).

ments of recreational hunters, the estimation of demand for thar hunting is a difficult prospect. Existing permit returns for hunting on crown lands would be virtually useless for this task. First, some hunters do not obtain necessary permits. Second, only a small percentage of those permits issued are actually returned (Aukerman and Davison, 1980). Third, those that are returned are likely to be inaccurate. Hunters interviewed indicated that returns have been intentionally falsified in the past in order to prevent Forest Service from learning the location of remaining animals. The demand for thar would have to be assessed on the basis of recorded kills. This is likely to lead to an underestimate. Finally, and most importantly, it can be safely assumed from the preceding discussions, that recreational hunting effort will vary substantially with thar population size. At the present moment it is probable that recreational use of thar populations will decrease through attrition of unsuccessful hunters, if there is no increase in thar numbers. It also seems safe to assume that recreational use of thar populations would increase with any substantial increase in animal numbers. However, it is impossible to assess in advance what the recreational hunting demand would be for a given increase in population size.

#### 7.2.8. Non Hunting Recreationalists.

Recreation is the primary human activity in national parks, state forest, and on UCL. It is also an important use of pastoral lands (Gresham, 1978). Many have commented on the substantial growth in recreational use of high country lands in general during the past few decades (see O'Connor 1972; 1978; 1981); Aukerman and Davison (1980); Thomson (1978); Wendelkin (1978)).

Tramping and mountaineering are the two principal forms of non-hunting recreation in the rugged country thar inhabit. There is no indication of conflict between recreational hunters drawn to the area to shoot thar and other recreational users. However, many trampers and climbers, as well as recreational hunters are disturbed by the overflight of light



20/08/2020

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To Whom It May Concern

**Submission on the Tahr Control Operational Plan 2020/21**

Thank you for the opportunity to comment on the Tahr Control Operational Plan 2020/21. We support the Department's objective to manage tahr numbers to sustainable levels on public conservation land.

We also recognise there is a significant amount of Crown pastoral lease land within the management units, often adjoining public conservation land.

We are making this submission to acknowledge the need for the Department of Conservation and Land Information New Zealand to work together on tahr management in the South Island high country. We want to ensure this land and its ecosystems are maintained if not enhanced for the benefit of all New Zealanders.

Given the need to ensure alignment with tahr management on public conservation land and Crown pastoral lease land, we briefly outline below some of the key considerations for LINZ's approach to tahr management.

**Background**

Crown pastoral leaseholders are responsible for managing weeds and pests on their lease. Section 99(b) of the Land Act 1948 specifies that leaseholders must keep the land free from wild animals, rabbits, and other vermin, and generally comply with the provisions of the Biosecurity Act 1993.

This has been a long-standing requirement of pastoral lessees and the approach to managing wild animal numbers is not new. the Land Settlement Board's 1984 High Country Policy notes a determination to ensure the adverse effects of wild animals on the high country will be kept to a minimum and requires active steps to be taken to reduce numbers where the level of animals is considered too high.

Tahr are prized by trophy hunters and relied on for both commercial and recreational hunting. This includes on Crown pastoral lease land, where there are a number of recreation permits held for commercial safari hunting operations.

However, in large numbers, tahr also cause significant damage to indigenous species, including in some of our most threatened high alpine ecosystems. For that reason, LINZ considers tahr a pest species when they are at high densities on Crown pastoral lease land.

### **Data and Information Priority**

LINZ considers that a priority for the 2020/21 plan is gathering good information on tahr numbers and impact. More specifically, we are keen to work with the Department to gather information on tahr numbers on those pastoral leases inside and outside the feral range. Additionally LINZ considers there is priority to target and eradicate tahr on pastoral leases outside the feral range, in accordance with the 1993 plan.

### **LINZ's approach to managing tahr on Crown pastoral lease land**

LINZ acknowledges that tahr numbers are likely to be too high on some Crown pastoral leases and where this is the case, there will be a responsibility to undertake control. LINZ considers that management of tahr to sustainable levels can be consistent with leaseholders' ongoing ability to run commercial and recreational trophy hunting operations.

LINZ is committed to working with the Department to obtain good quality information on densities and locations of tahr populations across all Crown-owned land, including Crown pastoral lease land. Having this information will ensure all parties involved in tahr management, from leaseholders to the Crown, can make well-informed decisions about the control required to bring tahr numbers to sustainable levels.

LINZ will be considering its approach to tahr control in consultation with the Pastoral Lessee's and the Department. In particular, LINZ will take into account leaseholders' compliance responsibilities under the terms of their lease, and LINZ's commitment to being an active manager and long-term steward of the Crown pastoral estate.

Yours sincerely,



Deputy Chief Executive Crown Property





## Canterbury Aoraki Conservation Board Te Rūnanga Papa Atawhai o Waitaha me Aoraki

Private Bag 4715, Christchurch Mail Centre, CHRISTCHURCH 8140

██████████  
Email: canterburyaorakiboard@doc.govt.nz

28 July 2020

Dr Ben Reddiex  
Director Operations Issues and Programmes  
Department of Conservation  
National Office  
WELLINGTON  
██████████

Tēnā koe Dr Reddiex,

### **Consultation on DOC's Tahr Control Operational Plan 2020/21**

The Canterbury Aoraki Conservation Board Te Rūnanga Papa Atawhai o Waitaha me Aoraki (the Board), is an independent body established by the Conservation Act 1987. Made up of 12 appointed members, including four iwi representatives, the Board represents the community of interest for conservation in Canterbury.

One of the Board's key roles is to *"to advise the Conservation Authority and the Director-General on the implementation of conservation management strategies and conservation management plans for areas within the jurisdiction of the Board"*.

The operative Aoraki Mount Cook National Park Management Plan is clear about exterminating or controlling introduced fauna in, and adjacent to, the National Park, and is specific about tahr: policy 4.1.5(b) is *"to exterminate tahr within, and actively control tahr adjoining the Park."* (page 57).

The Canterbury (Waitaha) Conservation Management Strategy natural heritage policy 1.5.1.16 is also clear: *"Contain Himalayan tahr within the feral range set out in the Himalayan Tahr Control Plan 1993 and seek to ensure that new populations of wild animals and pest animals are not established."* (page 32).

The Canterbury Aoraki Conservation Board's advice to the Director-General of Conservation is to actively implement these policies.

To this end the Board would like to express its ongoing support of Department efforts to control the Himalayan tahr population and its adverse effects on the alpine environment, across the central South Island. The Board recognises that currently, tahr numbers are in excess of the targets set in the Himalayan Tahr Control Plan (1993), and without active management to reduce these numbers, environmental degradation is inevitable. Therefore, we strongly support the Tahr Control


Operational Plan 2020/21, including efforts to reduce tahr populations to as close to zero density as practicable in the Aoraki Mount Cook National Park and the Westland Tai Poutini National Park.

Given the shared boundary of the Aoraki Mount Cook and Westland Tai Poutini National Parks, the Canterbury Aoraki Conservation Board engaged in consultation with the West Coast Tai Poutini Conservation Board and can confirm they are also in support of the Tahr Control Operational Plan 2020/21 (refer Appendix 1).

The Board would also like to reiterate their previous recommendation to the Minister of Conservation (letter dated 5 March 2019) that there be a full review of the Himalayan Thar Control Plan 1993. It is our view that the 1993 Plan, being more than 25 years old, is somewhat outdated. A revision of the Plan would allow all user groups and stakeholders to reengage in constructive consultation to find solutions to ensure that tahr are effectively managed and conservation values upheld.

Nāku noa, nā



 Chairperson  
**Canterbury Aoraki Conservation Board**  
**Te Rūnanga Papa Atawhai o Waitaha me Aoraki**



Appendix 1 – Letter of support from the West Coast Tai Poutini Conservation Board



[REDACTED] (Deputy Chairperson)  
Canterbury Aoraki Conservation Board  
[REDACTED]

03 August 2020

Dear [REDACTED]

Thank you for your email and letter regarding consultation on DOC's Thar Operational Plan 2020/21.

The West Coast *Tai Poutini* Conservation Board wholeheartedly supports the Canterbury Aoraki Board's position regarding the control of thar in the Alpine environment. Our Board recognises that thar numbers are in excess of the targets established in the Himalayan Thar Control Plan (1993) and that active management is required to reduce numbers in order to prevent further environmental degradation. Consequently, we fully support the Thar Control Operational Plan 2020/2021 which includes efforts to reduce thar numbers to as close to zero as practically possible in both Westland Tai Poutini and Aoraki Mount Cook National Parks.

It is also our view that the Himalayan Thar Control Plan 1993 has become outdated and a review would give an opportunity for all stakeholders to engage in meaningful consultation in order to protect our precious alpine environment.

As our views are aligned with those of the Canterbury Aoraki Conservation Board, we are happy to support the idea of a joint submission from all three Boards and for the Canterbury Aoraki Board to play a lead role in that process.

Yours sincerely,

[REDACTED]

Chair

West Coast *Tai Poutini* Conservation Board  
[REDACTED]



## Safari Club International (NZ) Written Submission

\*Please note, this written submission is supplementary to the verbal submission presented and does not replace it.

SCI welcomes the opportunity to engage in consultation, both verbally and in written form. However, we are disappointed that the relationship between the Department and the hunting sector has deteriorated to the point where the Department feels the need to have extensive security measures in place at meetings. This is a clear indication that the Department is failing to engage adequately and constructively with the hunting sector. Those representing the hunting sector present at the meeting were articulate, intelligent and good law-abiding members of the New Zealand Public. There is no ill personal intent, only a dedication to invoke change for the benefit of both conservation and the quality of life for all New Zealanders. The Department is here to manage our conservation estate for the benefit of the New Zealand Public. As such, we have expectations that reasoned decisions based on sound management practises are presented for comment which make use of progresses in knowledge. The hunting sector provides well thought out technical advice based on experience in operational, scientific and social applications. Unlike other stakeholders we are also a large part of the actual implementation of the plan. Therefore, we have a reasonable expectation to be involved in the forming of annual or other plans so that we can agree and support our role in its implementation. This process has been largely lost and so too has the trust between the Department and the hunting sector which is required for positive conservation outcomes throughout Aotearoa. This loss of trust has been further perpetuated by the Department beginning culling following the court hearing without talking to the hunting sector first, and not supplying full information to stakeholders prior to or following the commencement of any operations. While the judge gave leave for the 125 hours to occur at DOC's discretion, "can," "must" and "should" are not the same. This course of action suggests to SCI that DOC does not consider the hunting sector's concerns valid or our advice important and this was certainly conveyed during the court hearing. SCI maintains hope, but expects that the resulting 2020/21 plan following this consultation will clarify the Departments position.

SCI know that teamwork and positive relationships are the best way forward and that by working together to nut things out we are capable of finding solutions. It is imperative that

we aim for the best possible outcomes for conservation and this we consider; all stakeholders agree whole heartedly on. The argument at present is around the method we use to obtain these outcomes. There is considerable frustration from the New Zealand public around wastage and frivolous spending. Both are of concern in the case for the 2020/21 operational plan presented and this has led to discourse. The sought outcome as we see it is; benefits to conservation and protection of our indigenous flora and fauna. We have seen amazing conservation success over the past few years from working together. One example was on “stuff” this week, in the Kaweka forest park the kiwi call has increased by 600%. Hunters were major contributors to this success, clearing and resetting stoat traps and supporting a small volunteer group running a kiwi hatchery. Another is the blue duck project undertaken by the Sika Foundation, and the Fiordland Wapiti Foundation working with Kea Conservation Trust, the list goes on. There is a huge opportunity to increase the conservation effort by hunters and at no expense to the tax payer. On the other hand, with such high levels of frustration circulating over official control of bull tahr in the two National Parks, there is a huge risk that conservation efforts will be worse than undone. There are very strong views that stand on this issue from both sides, so we seek a middle ground to move forward and find some relief from this potential threat.

New Zealand is home to the only huntable herd of tahr outside of the Himalayas, making our tahr a very marketable resource, one of global importance. A trophy tahr hunt in their native range can cost between 25 to 30 thousand US dollars each, which means that expanding hunting opportunities in New Zealand could be viable for managing their numbers and generating much needed economic activity. To date the New Zealand government has yet to fully realise the value of our tahr resource, should the Department of Conservation be able to better regulate International hunters the tahr resource would fully fund a large number of conservation initiatives. On the other hand, the tahr population's decimation will cause severe financial harm to New Zealand's hunting industry, including, but not limited to, accommodation providers, helicopter operators, professional hunting guides, and safari and tourism operators. The plan fails to recognize the significant contribution of tahr hunting and viewing to New Zealand's economy. During a COVID-19-induced recession, preserving these hunting opportunities is essential to preventing dire economic consequences, as numerous jobs and businesses that are linked to the hunting of tahr will suffer if the DOC's plan is fully implemented. A considerable amount of the income generated by the hunting of tahr is spent in regions like Westland, areas that are currently really hurting in the wake of

COVID-19. Following the Covid-19 pandemic, New Zealand is in a unique position to receive a higher number of international hunters than other countries. International hunters are high value, low impact tourists and will provide significant relief to the economy once they are permitted to return. SCI urges the government to rethink the plan and to reconsider how tahr hunting can contribute to economic recovery and management of the species. Even if our borders do not re-open for some time. Our tahr herd will continue to drive local tourism, with one helicopter operator on the West Coast currently flying around 1000 tahr hunters annually. The West Coast is really hurting at the moment and anything that can be done to improve local tourism should be a priority.

SCI agree with other stakeholders that the Department must avoid controlling tahr in the vicinity of huts and operators should also check known campsites before commencing culling operations. It costs considerable time and money to reach remote locations and it should be of the utmost importance for the Department to ensure recreational users have positive wilderness experiences. No culling within a 2km radius of huts would be a sensible clause to add to the 2020/ 21 plan.

SCI agrees with other stakeholders that the Department must make it easier for WARO operators to be able to operate, adding tahr (excluding identifiable bulls) to the existing WARO permit with spatial and temporal provisions to prevent conflict in April, May, June, is the necessary first step. The Departments failure to make this process easier has not helped with controlling tahr populations to date. SCI also recognises that a subsidy for these operators is a good idea and one that should be fully explored.

SCI would also like the Department to maximise hunting opportunities for hunting sector. In the near future there will not be a great deal of work for helicopter operators in places like Franz Josef Glacier and Fox Glacier. Enabling these operators to drop recreational hunters and guided parties into remote areas of Westland National Park would be a great initiative for regional spending and is the preferable method to reduce bull tahr numbers in the National Park. Conservation projects, such as running and servicing stoat lines to protect who could be a condition of the permit to land.

**Sustainable adaptive management is the only way to avoid boom bust cycles caused by Wild Animal Control.**

“The Himalayan Thar Management policy (reproduced here as appendix 1) now provides a general direction to achieve sustained control of thar; thar populations are to be reduced to, and kept below, prescribed levels (which will vary from area to area) at which unacceptable damage to conservation values occurs. The policy recognises that thar cause impacts on natural ecosystems and to provide recreational and commercial opportunities.”

Page 13 HTCP

“There is significant conservation and management value to be achieved in attempting to carry out thar control in a sustained manner and avoid the historical boom and bust patterns of wild animal control”

Page 13-14 HTCP

There is a need to seek compatibility of future commercial hunting with the other forms of hunting so that all groups are encouraged to maintain a high level of interest and activity. This may involve the restriction on taking of bull thar by commercial hunters over part or all of the breeding range”

Page 22-23 HTCP

“The present wild animal recovery licencing and permitting systems are managed to minimise conflict between hunter groups and avoid boom-bust hunting. 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 balance between competing demands, and acknowledgement of commercial reality.”

Forest and bird have made it clear that they will not provide assistance to make sure vegetative goals are being realised, and that they do not have the volunteer support network to do so. Collectively, hunters are a team of more than 100,000 kiwis and as has been demonstrated by our multiple conservation-based projects, we are willing to put the volunteer hours in required to help successfully protect all our natural and historical resources. We invite you to work with us to formulate conditions which would allow a more progressive approach to be achieved. As tahr were present within the two National Parks prior to the Parks being gazetted, the hunting sector considers tahr within the Parks to be a historical natural resource. As such, the hunting sector will seek an exemption from the NZCA for tahr in the two National Parks, as currently exists for trout, under the constraint that vegetative

goals for the two Parks are being realised. Obviously low densities will still need to be maintained and protection of flora and fauna will be priority number one. Checks and controls will need to be implemented to make sure the conditions of the exemption are being adhered to and penalties for failure. While we would love to have this exemption implemented now and it would put an end to court proceedings for the Department, we also understand it may take time and research to formulate the requirements to make this a reality. The simple reason for this stance by the hunting sector is not to increase densities, but to allow for sustained control of tahr using long term methods, create unity among the people of New Zealand and protect our environment, culture, heritage and quality of life. These values are core to the mission of the NZCA.

The HTCP currently stipulates a density  $<1$  tahr per  $\text{km}^2$  in the two National Parks. The issue is how and when this achieved. While DOC has stated that it must adhere to the HTCP 1993, it appears to be selective in the portions which it chooses to implement and when. We all agree that targeting nannies in the parks is to be done. The hunting sector reasoning is based on biological principles, no ladies = no babies, therefore the most significant long-term contribution to a low tahr population. The Forest and Bird argument as we see it (obviously we can't know their thoughts, only observe their stance from an outside view) is simply that there should be no tahr in National Parks, so shoot them all. This of course is a concise and easily promoted view but not one that is able to be achieved in reality. Even in the exclusion zones zero density has not been achieved and pockets of tahr currently exist outside the feral range. SCI believe targeting the exclusion zones and outside the feral range to be an absolute priority for DOC control to ensure tahr don't get a foothold in other important areas, such as Fiordland. The exclusion zones need to remain as close to zero density as possible every year for all time. This is a considerable commitment for the Department in terms of expenditure, one that has not yet been undertaken this year, despite it being of the highest priority in the HTCP 1993. With regard to the two National Parks, zero density is absolutely unattainable. The two Parks are central to the feral range and tahr have had a strong foothold in the Parks since their original release in 1904. With this in mind we come to the contentious issue at hand, "bulls in the Parks". Until such a time as we have the vegetative information to know what density of tahr have negligible impact on a site-specific basis, we will support lowest possible maintainable densities.

What the hunting sector contests is how this is achieved, by who and when.

Page 41 HTCP

“Official control will generally only be employed when other alternatives have not proved to be either successful or viable. The exemptions to this are in the Northern and Southern exclusion zones and the Wills/Makarora/Hunter and possibly Mount Cook / Westland National Parks management units, where recreational, guided or commercial hunting are unlikely to achieve population targets over the entire area.”

We are therefore pleased that the NZCA have extended the offer of considering a plan from the GAC, which demonstrates a likely achievement of target densities over the entire area by the hunting sector. SCI advises the Department to suspend official control of bulls in the two National Parks and facilitate a more agreeable plan in collaboration with the GAC. Again, we highlight the lack of urgency for culling and the page 41 provision above legally allowing for this more reasonable solution to be found.

Inside the feral range, but outside the two National Parks, there is absolutely no urgency or justifiable need to undertake the hours of control proposed. It is clear that there is a lack of evidence to indicate urgency of control on the basis that;

- No species are confirmed to be threatened or at risk of extinction from the current densities of tahr
- There are no updated scientific measurements to indicate densities exceed thresholds
- The large number of tahr removed over the past two years has resulted in a considerable population reduction
- Official control may not be required for the HTCP targets to be realised through time due to ongoing reductions following female biased harvest that has yet to be realised

The call for research, as is part of the HTCP plan, was promoted by all stakeholders at every meeting over the past two years.

Page 7 HTCP

## 2.2 Impacts on the environment

“There is little evidence describing thar impacts on flora and fauna.”

Page 10 HTCP

## 2.3 Impacts on conservation values



“Specific values have not been identified in ecological terms for much of the Thar range.”

Page 15 HTCP

#### “5.2 Monitoring Thar control

“It is desirable that improvements to monitoring of hunter success be sought. Such statistics are an integral part of the data required to determine regional trends in thar population size and to ensure target densities are not exceeded.”

Other than basic population monitoring pre 2019 culling, the Department has only in the past two months begun to work towards identifying research goals and nothing of substance has been presented to date. Making management decisions so blindly is a recipe for disaster, and the concerns of stakeholders in this regard are well founded. SCI hopes the Department applies more careful decision making for management of our endangered species. Dr Ken Hughey, present at the recent meeting, indicated that it could take three - four years to obtain the research we need to make sound decisions. We should be at least half way there by now, with a far greater understanding and growing knowledge base. With this delayed start, SCI understands that the full extent of research required will take time. However, we expect even partial knowledge will provide a better indication of direction for decision making than none at all. Therefore, SCI advises as much research as possible be undertaken prior to next year’s operational plan and SCI commits fully to assisting in the acquisition of the required knowledge. There is negligible risk in taking this approach, given tahr have been existing in the feral range at higher density than they are currently for many years, not resulting in irrevocable conservation outcomes. In addition, 125 hours committed inside the feral range (although we do not know where precisely) will have already been undertaken prior to the decision being made. This is more than in previous years. In addition, the limits in the HTCP are conservative, so we have time to slow down and assess how close we are to obtaining the prescribed targets. We must have a way to know when to stop.

Page 22 HTCP

#### Maximum thar densities

“These limits are intended to be conservative.”

If the priority for control is the exclusion zones and the Department needs to spend all the allocated monies on control, then SCI supports the targeting of exclusion zones and outside

the range ferociously. MU 7 is not above intervention density, so requires no control. GAC is proposing a method to deal with bulls in parks, so official control could target nannies in the parks, we all agree on this. A major scientific effort for sound decision making will also create jobs, support post covid-19 recovery, gain public buy in / trust and rebuild relationships between DOC and the hunting sectors. DOC cannot hope to implement the HTCP though all time without the hunting sector. SCI verbal presentation sort to form an organisational structure, which gave each stakeholder and implementor their own purpose and targets to be achieved. That promotes team work and cooperation to achieve environmental goals that are sustainable through governments, but have checks, balances and accountability. This is a no brainer and SCI invites the Department to work through the process of this operational restructure for the success of future operational plans.

The legalities of legislation have been quoted again and again. However, the ambiguity of the judge's conclusions i.e. can but not must, is a clear display of the purpose of legislation, as only a guide for managers. Legislation is designed this way to allow for technical discretions to be made. Certainly, page 41 HTCP as quoted above shows this.

We note in the meeting that Forest and Bird admitted to being an integral part of the formation of legislation pertaining to conservation estate. SCI therefore contests that a significant imbalance in the formation of legislation has occurred, and that legislation needs to be updated to support all of the New Zealand public, not just one stakeholder. Particularly one that functions as nothing other than a stick to its self-placed legislation and long-term agenda. SCI is pleased to hear Forest and Bird have accepted that tahr are here to stay and that 10,000 is acceptable. However, whether they choose to listen to the advice of science and good management for the protection of our biodiversity and quality of life in the long term is yet to be seen. Despite the Forest and Bird biases within the legislation, there is room for interpretive differences.

Below is an example of an alternate interpretation within the Conservation Act 1987 and relevant policy. This can be provided for all the legislation in an extensive and comprehensive way. However, in this submission we seek to be concise and so provide only one part to serve as an example.

### **General Statutory Context**

1. Conservation Act 1987

*“Conservation means the preservation and protection of natural and historic resources for the purpose of maintaining their intrinsic values, providing for their appreciation and recreational enjoyment by the public, and safeguarding the options of future generations.”*

*“natural resources means-*

*(a) plants and animals of all kinds; and*

*(b) the air, water, and soil in or on which any plant or animal lives or may live; and*

*(c) landscape and landform; and*

*(d) geological features; and*

*(e) systems of interacting living organisms, and their environment; and includes any interest in a natural resource”*

The Himalayan Tahr is by definition of the Conservation Act 1987 a natural resource. Policy 13a CGP 2005 calls for such natural resources to be defined.

*“Conservation management strategies and plans should include identification of: i. natural resources, historical and cultural heritage, and recreational opportunities, at specific places on land and water...”*

The preservation and protection of natural resources is required by the Conservation Act 1987.

***Preservation**, in relation to a resource, means the maintenance, so far as is practicable, of its intrinsic values*

***Protection**, in relation to a resource, means its maintenance, so far as is practicable, in its current state; but includes—*

*(a) its restoration to some former state; and*

*(b) its augmentation, enhancement, or expansion*

The second part of the definition applies specifically to tahr in that they are recreated and appreciated by the public. The point under dispute is in regard to the extent and logistics of “safeguarding the options of future generations”

While “protection” allows for a return to “some former state,” it also provides the option for “enhancement.” The term “enhancement” by definition is an increase or improvement in quality, value, or extent. This allows for improvement to quality, value and extent of

Himalayan Tahr, for which the hunting sector only seeks within the bounds of their current feral range.

*53 Powers of Director-General,*

*3) Without limiting the generality of subsection (1), the Director-General—*

*(g) may **control** any introduced species causing **damage** to any indigenous species or habitat.*

The term “control” is not defined by method or extent within the Act. Therefore, both the method and extent of control are up for debate and arguably at the centre of the current opposing views within the bounds of the HTCP.

The term “damage” is not defined in the Act. All species, indigenous or introduced, could potentially “cause damage” on some level to another species or habitat by their presence. To apply this generalised policy “damage” must be defined and the hunting sector require the Department to do so in a way that is quantitatively measurable and relevant across time and space, as part of the reasoning given for decisions made on the final operational plan as per requirement of the court decision. In addition, each indigenous species where “damage” identified results in control of another natural resource should be specified and the Departments expectations for its “protection” as per the Conservation Act 1987 interpretation.

#### Management planning documents

Policy 4 of the CGP refers to pest management programmes.

The Biosecurity Act 1993 is the only statutory Act which actually defines “pest”; an organism specified as a pest in a pest management plan.

With regard to the Biosecurity Act 1993, there is not a “pest management plan” for tahr. The HTCP 1993 rather is a Wild Animal Control plan for the management of Tahr and does not qualify tahr as a pest under the Act.

*wild animal as per WAC Act 1977*

*(a) Means*

*a. any deer (including wapiti or moose):*

*b. any chamois **or tahr**:*

- c. *any goat that is not*
  - i. *held behind effective fences or otherwise constrained; and*
  - ii. *identified in accordance with an animal identification device approved under the National Animal Identification and Tracing Act 2012 or in accordance with an identification system approved under section 50 of the Biosecurity Act 1993 and approved by the Director-General for the purposes of this Act:*

The CGP gives the definition of pest as “*Any organism, including an animal, plant, pathogen or disease, capable or potentially capable of causing unwanted harm or posing significant risks to indigenous species, habitats and ecosystems or freshwater fisheries.*”

There are a number of issues with respect to this definition being but not limited to;

- (1) All species, including indigenous species, may be considered as pests, and no ranking is currently defined.
- (2) All species are potentially capable of unwanted harm.
- (3) What constitutes unwanted harm is not defined and the word “unwanted” is subjective.
- (4) Significant risks are not defined in this document. The word significant is not subjective. Its definition is required to allow for application to decision making.

The points of relevance to tahr in the CGP follow;

#### 4.2

*(e) Commercial hunting of wild animals and animal pests should be encouraged to maximise the effective control of them, while minimising any adverse effects of hunting on planned outcomes at places.*

*(f) Recreational hunting of wild animals and animal pests should be encouraged where this does not diminish the effectiveness of operations to control them and is consistent with planned outcomes at places.*

The wording “wild animals and animal pests” within the CGP gives distinction between the two. Wild animal is defined clearly in Conservation Act 1987, but the criteria to be considered an animal pest is not clear. If wild animals are automatically identified as pests

then no distinction would be made. “Maximising effective control of them” is subjective, in what is effective control of a wild animal species.

SCI looks forward to working positively with DOC and the GAC for progressive and continued improvement of our game animals for the benefit of the environment, recreation and industry.

If you would like any further information or help in preparation of the 2020/21 plan please do not hesitate to contact us.

Regards

A solid black rectangular redaction box covering the signature area.

SCI (NZ chapter)



# SCI International

Hunting for conservation

# Wildlife management 101

- ▶ Three decisions are needed:
  - (i) What is the desired goal?
  - (ii) Which management option is therefore appropriate?
  - (iii) By what action is this best achieved?
  
- ▶ It is not the function of the wildlife manager to make the necessary value judgments in determining the goal, any more than it is within the competence of a general to declare war.
  
- ▶ They should know whether current knowledge is sufficient to allow an immediate technical decision or whether research is needed first.



# Wildlife management 101

- ▶ For complex problems it helps to be more formal and organized, mapping out on paper the path to the decision through the facts, influences, and values that shape it.
- ▶ This process should be explicit and systematic.
- ▶ It helps also to determine which disagreements are arguments about facts and which are arguments about judgments of value.

**Before we begin manipulating a wildlife population and its environment, we must ask ourselves why we are doing so and what is it supposed to achieve.**

# Wildlife management 101

- ▶ Where do we want to go?
- ▶ Can we get there?
- ▶ Will we know when we have arrived?
- ▶ How do we get there?
- ▶ What disadvantages or penalties accrue?
- ▶ What benefits are gained?
- ▶ Will the benefits exceed the penalties?



# Wildlife management 101

Policies are usually composed in broad terms that provide no more than a general guide for the manager.

- ▶ Non-policy -“protecting intrinsic natural values.”
- ▶ Non feasible policy
  - two or more technical objectives are mutually incompatible.

Or

- so specific that it actually determines technical objectives and sometimes even management actions that may be unattainable

Objectives must be attainable within a specified time frame and defined in a technical schedule.

There must be an easy way of recognizing failure to attain an objective.

# Population monitoring versus culling

2019

Monitoring Feb through June

- 34,478 (95% confidence interval 26,522 - 44,821)
- MU7 not above intervention density
- No sex data presented
- No age structure presented
- Problems with variance (Lots of zero counts)
- Habitat stratification needed for precision
- Unattainable targets

2020

Culling and harvest May - November

- ~10,634 females and juveniles removed
- ~740 males removed
- Unknown rec hunter harvest est. 2000
- MU7 targeted
- Remaining population unknown
- Recruitment unknown
- Cross over between sampling and harvest?

- No monitoring
- No data provided
- No sex data
- No age structure
- No vegetative monitoring presented
- No idea what the population looks like now!!!!
- No schedule
- No way to know when targets are reached
- No definition of vegetative goals

2021

Culling and harvest May - November

- Partial data presented
- No sex specific targets
- No population modelling
- No vegetative justification
- No spatial data on control provided
- No public by-in
- No trust
- **The Department is failing**

# HTCP

- ▶ Sustainable harvest
  - ▶ Tahr - a natural resource
  - ▶ Reduces costs of animal management to general public
  - ▶ Provides income to support conservation initiatives and conservation science
  - ▶ Socially acceptable
- ▶ Adaptive management
  - ▶ Allows for change

**Is the Department the right agency to implement the entire HTCP?**

# A progressive approach

- ▶ Define a herd breeding population to be maintained
- ▶ Set yearly harvest required to maintain resource at level which supports sustainable harvest model and progressively reduces bulls to within acceptable levels
- ▶ Encourage hunters to reach targets by supplying access and information
- ▶ Spatial adjustment of commercial and recreational hunters focus areas.
- ▶ Define vegetative goals spatially by species in a measurable way
- ▶ Continued monitoring of populations, dynamics and vegetation
- ▶ Investigate site specific temporal carrying capacity.
- ▶ Base breeding population and harvest capacity of site specific vegetative goals
- ▶ Protection of our vegetation achieved long term and everyone is working together.

# DOCS current approach

- ▶ Define overall population size
- ▶ Cull according to number
- ▶ No population modelling
- ▶ No sex or age structure considered
- ▶ No assessment of impact on sustainable harvest model
- ▶ Loss of public buy in
- ▶ Not encouraging hunting through long term resource destruction by potential over culling of breeding population
- ▶ No vegetation monitoring
- ▶ No way of knowing when the goal is achieved
- ▶ Goals not clearly defined
- ▶ Unnecessary increased expenditure
- ▶ Cost to economy through resource destruction
- ▶ Failure to implement HTCP in its entirety

# SCI advises

- ▶ Intensive culling effort committed outside the feral range as is control priority.
- ▶ No further culling inside the feral range until the following is conducted or presented
  - ▶ Population abundance 2020 / 2021
  - ▶ Sex data and age structure by MU
  - ▶ Population modelling to support ongoing sustainable harvest model
  - ▶ Measurable vegetation goals clearly defined
  - ▶ Clearly define how we will know goals have been achieved
- ▶ DOC move to function as support and regulatory agency in co-governance with Nga Tahu.
- ▶ Hunter and animal management implemented by a Sustainable harvest management team under GAC direction to regain public buy in and ensure conservation is not negatively impacted by the public's lack of trust.
- ▶ SCI accepts no responsibility for the social or environmental repercussions which result if the Department chooses to ignore our advise.

Thanks for your time and here's to moving forward and not repeating past mistakes



Fryxell JM, Caughley G, Sinclair ARE. 2014. Wildlife Ecology, Conservation, and Management. Hoboken, UNITED KINGDOM: John Wiley & Sons, Incorporated





# 2020/2021 Operational Tahr Plan

## NZTF Submission

**5/8/20**

The NZ Tahr Foundation was formed as an umbrella group in 2016 by all groups interested in achieving a herd of special interest to work with the Department to manage tahr and control their impacts under the Game Animal Council Act. We have a very large number of constituents and 100,000s of followers and people we represent through our various member organisations.

Firstly, we need to register that we are struggling to understand how we are supposed to submit on the whole 20/21 Plan, when half of the projected hours have most likely been done, and we don't know what the result of the first 125 hours – how many tahr have been killed in what MUs. We are struggling to see how what we are contributing here can be seen as the full consultation required by the High Court without this important data.

Also, any previous engagement between the Department and the NZTF in May/June and responses back from us this year cannot be taken as consultation with us. The scale of this year's plan was never conveyed to us and we presumed it was going to be similar to last year as when asked, DOC did not answer the question of how many hours they were going to be doing or the magnitude of the draft 20/21 plan. The issue of bulls in National Parks has been mentioned every year, but never acted on, and we presumed the same was going to be the case this year – especially considering the effects of Covid 19 on the guided and recreational hunting industry.

### Important Clarifications/Ramifications

We are not responsible for either control or monitoring under the HTCP. That responsibility clearly lies with the Department. The Department has allowed a lot of misleading statements made in this regard to go unchallenged in the media. Hunter representatives have always acted in good faith working with the Department on tahr control. We have continually said the Department is only doing its job all the way through this process, and not to shoot the messenger so to speak. We feel the Department has certainly not reciprocated, or remained as impartial as it should have with its communications.

Covid 19 has not allowed the harvest of bulls that would have been expected this year, and to have the Department targeting bulls saying it's because the hunters haven't taken them is an absolute slap in the face. The vast majority of hunting is done on public land, and the department's insinuation and statements that the majority is done on private land is totally untrue. If the reporting shows otherwise then that is an issue with the Department's reporting systems. The AATH data they do have show's a rapidly increasing percentage of AATH trophies coming out of National Parks, and that is not fairly represented by reporting an average number of trophies over the 5 years. We have no data for the number of tahr taken by recreational hunters in NPs, but arguably hunters are the largest users of the NPs including the back country huts and facilities away from the tourist walking tracks. The largest helicopter concessionaire for the West Coast tells us that hunters are their biggest clients by far after the tourist flights, especially in Westland NP. (*pers. comm.* [REDACTED])

In the last few weeks there has been several cases of recreational hunters having what for some of them is their hunting trip of a lifetime ruined by the Department's control operations occurring all around them with no prior warning. Some of them have spent considerable money and time travelling down from the North Island, only to have their experience destroyed, and put through in their words "a really scary experience" with shooting all around them and the shot tahr setting off wet slide avalanches in their vicinity. This is entirely preventable. All the Department needs to do to avoid the time and place conflict is give at least a week's warning when an area is going to receive control - not the specific dates - so hunters' and other PCL users can plan their trips accordingly. We absolutely do not condone anyone making threats of violence on either side of the debate, and have continually asked everyone to maintain the high moral ground and leave the stupid stuff out of it. But if there has been huge increase in threats, it does show how significant this issue is to a lot of New Zealanders.

The only threats we have personally seen are those to boycott the operators doing the highly contentious control work shooting bulls, and we would have thought that is a totally understandable reaction, especially from those whose livelihoods are going to be destroyed. It was disappointing to see the Operations Manager say publically "We are appalled that anyone is threatening to boycott legitimate businesses undertaking important control work...".

Hunter groups undertake many conservation projects all throughout the country and in a lot of areas are the only ones running large predator control programs – in the Ruahines, Kawekas and Kaimanawas in the central N.I. and the Wapiti area of Fiordland for example - and we have been working hard to establish and maintain good working relationships between the Department and all hunters. We have supported the development of the tahr app to help inform the control program. All the good work that has been done is in serious jeopardy due to the way hunters have been treated over this 20/21 operational plan, resulting in having to go to court to get proper consultation by the Department. The whole country is watching this process intently to see if the Department is now going to treat the hunters fairly and use sound science as demanded in the '93 Plan in the development of the 20/21 operational plan. The app is almost certain to fail now thanks to the huge mistrust that has come about from the way the department has handled the tahr control issue.

#### MU Intervention Densities

The Department does not have the information it needs to control tahr at the MU level as required by the HTCP. Its MU level population estimates are woefully imprecise, and it has not accounted in any way for the effects of last year's huge nanny biased culls. The Department runs the very real risk of over culling some of the MUs this year. And going forward considering the already large reduction in breeding age nannies, the populations could well be suppressed well below intervention densities in some MUs for most of the next decade if the Department goes ahead with a cull of this scale.

With the earlier consultation not indicating the large increase in magnitude of this year's plan, we presumed the Department was going to do more population monitoring and modelling before undertaking culling of this scale. The Department said they were going to look at [REDACTED] modelling which gave us some hope they would take into account the population demographic and base future control work on a better understanding of the population and the longer term effects. The GAC has since done more significant modelling which we sincerely hope the Department is going to take into account in its revised 20/21 Operational Plan.

## National Parks

After last year's large nanny culls in the NPs, there has been no environmental need demonstrated by anyone to target bulls. The targeting of bulls is also the least efficient way of lowering the population in NPs, as clearly demonstrated by the GAC. With low nanny numbers, the bulls will leave to find mates outside the NPs, and those that stay will be progressively shot by hunters - if they are left there to attract hunters into the NPs. They also have very high natural mortality (Tustin *pers. comm.*) There will also be very low recruitment, and the bulls will not be replaced by natural increase to any extent.

We would have agreed to continue nanny culls in population and ecological hotspots especially in WNP, but we are extremely disappointed to see the Department has instructed or allowed such heavy culling in the most hunted valley in the NPs – the Murchison valley including around Liebig and Steffan huts. Both [REDACTED] have done runs in exactly the same places about a week apart, which shows either the Department is really trying to stick it to recreational hunters, or a complete lack of management by the Department of its contractors. We hope it is the latter, but this is still not a good look, when there is much more inaccessible areas of the Park they should have instructed their contractors to target.

Targeting eradication in NPs is not the best use of the Department's budgets, and is not necessary to protect vulnerable alpine ecosystems. Culling to a low population that still provides for a viable hunting resource is the best solution because it will still encourage hunters to go in there doing a significant amount of control at no cost to the tax payer. Controlling to zero density means no hunters will bother to go in the NPs, removing the largest users of the NPs away from the tourist walks, and ensuring the Department will have to do all control in the future.

The hunting sector have asked for bull tahr to be given an exemption from the eradication clause for the next year anyway as the NZCA is able to do under Section 4 2 b, but we've been turned down without what we feel is proper consideration. There are precedents for exempting valued introduced species from total eradication, and we feel tahr are certainly one of these. The Department will never achieve total eradication anyway, and far better to cull to a low level that protects the alpine environment but leaves a viable hunting resource. This is just common sense.

## Outside the Feral Range

We totally support a huge increase in control work outside the feral range to stop the spread of tahr both north and south. This work is especially important to stop them getting into Fiordland NP.

## Suggestions going forward

Targeted culling of higher density areas and higher conservation value areas in the MUs is what is required to meet the directive and objectives of the '93 HTCP. Population demographic modelling is essential before we undertake much further culling as we approach the intervention densities in each MU, to ensure the best hunting resource is provided for that density of tahr. After last year's intensive nanny biased culling, we need to be very careful we don't cull nannies too heavily in some areas to the extent the densities are suppressed well below intervention levels and it jeopardises the longer term viability of the herd and seriously effects the viability of the hunting resource. Any culling in most of the MUs this year must be precautionary until this monitoring and population

modelling is done. And this needs to be done at MU density level as stipulated in the Plan, not whole of population. It is essential we work together to provide the best hunting resource possible within the intervention densities set in the Plan. Just throwing hours at control will certainly not do this.

We have provided information on what areas and MUs require more extensive nanny culling in the interim until this population modelling has been completed. Our members have more up to date information on these areas than the department in a lot of cases. (The information we have provided is included in the GAC's proposal.)

Again, if we get this wrong, we will cause hunters to boycott those areas jeopardising the cheapest form of herd control.

If after we agree on the 20/21 Control plan, the agreed control work is not able to be completed before kid drop this year, we would accept the remaining work could be done in the remote areas that are harder for the hunters to access in June 2021, giving the hunters the popular spring and summer and early rut period to make the most of the tahr resource.

If the tahr densities are lowered in NPs to the extent the hunting resource is gone (which will happen long before getting down to zero density), then this is going to cause a large shift in hunting effort into the remaining areas inside the feral range. Not only the commercial sector, but all the recreational hunting that's goes on in the Parks will now be concentrated into a significantly smaller area, creating the sort of conflict we've managed to largely remove in recent years.

To minimise conflict we need to very carefully manage the tahr resource as we approach the HTCP MU limits. For the whole of NZs sake we need the herd to provide the maximum number of trophy bulls possible at these densities to not jeopardise the highly lucrative guided hunting industry that is hugely dependant on the tahr resource, and also the huge recreational hunting resource that has large flow on benefits for retail, accommodation, travel, hospitality and the local communities as hunters come from all over NZ to hunt tahr. It is also hugely important for our physical and mental wellbeing.

DOC has fostered this whole tahr hunting resource, both guided and recreational, and needs to manage its control very carefully to balance both the needs of the environment and this hugely valuable resource.

What does the NZTF want to see come out of this process?

The '93 Himalayan tahr control plan set out to find out what density of tahr would not have an unacceptable effect on our indigenous vegetation across the various MUs, while still providing a viable hunting resource to enable their contribution to tahr control. Success for us would be being able to answer that question.

A lot of the TF members are farmers. I would suggest no farmer today is farming exactly the same as he was in 1993, to be successful and manage his assets he needs to constantly take in to account stocking rates and recovery of his pasture across different aspects and conditions. He needs to produce quality animals year after year to stay viable, and at the heart of that is maintaining a healthy landscape to support this. And he needs the social licence to continue farming, which requires taking into account environmental considerations.

A lower number of healthy animals within the carrying capacity of his land is key to his future today. It's not rocket science but science is needed. It is achievable but it takes commitment and constant reviewing.

In the absence of this information required of the Department by the 93 plan, and as a show of good faith, we agreed to the huge nanny biased culls of last year. Going forward we expected a phased approach, based on sound science. Unfortunately this is certainly not what we see in the draft 20/21 operational plan, and as a consequence of the department's management of this process, is why we are now in the middle of tarhmageddon 2!



**New Zealand Association of Game Estates**  
**DOC Consultation on the HTCP Operational Plan for 2020/2021**  
**Written Submission 5th August 2020**

**Brief description of the NZAGE**

- 100% voluntary self regulating association with the purpose of setting standards for privately owned enclosed properties managed for the purposes of hunting and other land use i.e. tourism, grazing and biodiversity
- Approx 20 members, with a number of potentially eligible properties looking at membership. This figure is not exhaustive as there are a number of potentially eligible properties who choose to remain unaffiliated with any self regulatory body
- In operation since 1998 and closely aligned with the NZPHGA
- Represent the bulk of investment, cost and risk borne by the commercial hunting sector. Cost of land, fencing, stock, management, improvements, compliance and client recruitment / marketing. Estimates are around the \$300m mark for total on property investment.
- We have actively worked with the Department of Conservation and other government agencies in good faith to develop our Industry Agreed Standards, with the intent of fostering understanding each other's priorities and a 'good neighbour' policy.

**Current situation facing NZAGE members**

- NZAGE members are on their knees financially as a result of Covid 19.
- 2020 has seen just 10% of our operational season / income, but with 65% of operational costs.
- Every operator will be facing a catastrophic loss for 2020 and most likely 2021 too.
- This will mean 24 months with a greatly minimised income but with fixed costs and obligations that cannot be avoided, which limit owners / operators ability to pivot.
- The tourism industry is the hardest hit sector in the NZ economy and the game estate sector is arguably one of the worst hit within that.
- A significant number of member businesses and unaffiliated game estate businesses will fail in 2021 if borders remain closed, assuming no external intervention.



## **Effect of the proposed 2020/2021 Operational plan on Game Estates**

- With the above as context, it makes the way in which the 2020/2021 Tahr operational plan has been approached by the Department all the more brutal in terms of timing and intent.
- It feels like that while some tax contributing industries are bleeding out with absolutely no end to the pain in sight, the Department has received a huge slice of taxpayer money, ostensibly for job creation and is forging ahead in an almost bloody minded fashion with a plan to kill as many tahr as possible in a short timeframe, with zero consideration to the consequences and minimal benefit to employment or the economy.
- It appears that the losers on the day are due process; specifically the requirements for consultation and ongoing research and monitoring.
- The other big losers, of course, are those who value or depend on tahr as part of their livelihood.
- On the question of principles can the Department really say they have acted in good faith?
- The phrase 'being kicked while we're down' does not seem inappropriate here.

## **The value of tahr to GE's**

- The direct value of a bull tahr to NZ has been estimated at \$14000 per animal, made up of trophy fee, guiding, lodging, transport, taxidermy and expediting.
- This figure reconciles with the value most commercial hunting operations derive from tahr as part of their trophy options.
- Based on the \$104m annual revenue of the guided hunting industry, it can be safely assumed that tahr are directly accountable for over \$20m of this figure.
- The true value of the tahr resource to our industry however, is more than just its raw monetary value. Tahr are an important drawcard species for the guided hunting industry.
- International hunters can hunt red stags in a number of countries around the world, but can only hunt tahr in New Zealand. Many international hunters book their red

stag hunt in New Zealand because they can also hunt tahr here. Without a viable tahr herd our industry stands to lose not only the revenue associated with tahr hunting, but also a significant portion of the revenue derived from the other high value game animals our visiting tahr hunting clients hunt while here on their tahr hunt, principally, our lucrative private land game estate red stags, plus the non hunting tourism revenue derived from companions, touring and retail.

- There is a strong argument to be made that were it not for the option to hunt tahr, many hunters would instead opt to hunt Red Stag in a rival location such as Argentina which is cheaper, closer and more accessible to our core US market.
- To not have a viable bull tahr population in National Parks, adjoining public land and by future extension, crown pastoral lease and freehold private land, game estates outside the feral range would experience a massive reduction in our ability to fulfil existing contracts, satisfy client demand and generate future bookings. This would be due to conflict from displaced commercial and recreational hunters putting pressure on a diminished resource that may not be able to sustain future demand.
- This would further hamper our recovery from Covid and may assist in preventing it entirely at a time that NZ can ill afford to lose a valuable high yield, low impact export tourism industry.
- Many game estate operators have remarked that it is difficult to watch your livelihood evaporate while a key resource in any potential recovery risks decimation via a state sponsored agenda.

### **GE's preferred approach to Management**

To be clear the NZAGE 100% appreciates the need for tahr management. We have always supported the idea of a staged management approach based on sound research, monitoring and consideration of effects on all interested parties.

To date, that research and evidence seems to have eluded us. This brings us to the core problem which is, on one hand:

- If we reduce the tahr herd below what constitutes a sustainable hunting resource without undertaking the appropriate research and monitoring, it will take years to recover. This has immediate and long term negative implications for our industry.

And, on the other hand:

- If we backed off on the urgency of the timing and resolved to maintain the current population levels while we undertake the science prior to re implementing the plan,

we regain trust, goodwill and partnership from the hunting sector for minimal adverse effect.

It would appear that the consequences of pressing ahead regardless are way out of balance with the consequences of undertaking research and monitoring first. One would have to question why this is the case?

The NZAGE believes that the remaining budget for the 2020 / 2021 Operational Plan should be directed towards research and monitoring before undertaking further flying & culling operations.



**President, NZAGE**



[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 5 August 2020 11:29 pm  
**To:** tahrconsultation; Ben Reddiex  
**Cc:** [REDACTED]  
**Subject:** Written Submission of Mt Cook Trophy Hunting - Tahr Control Operational Plan 2020/21  
**Importance:** High

Tahr Control Operational Plan 2020/21

Written Submission of Mt Cook Trophy Hunting

To Whom It May Concern

Mt Cook Trophy Hunting, by way of written submission would propose, in addition to their verbal submission given 3rd August 2020, the concept of contracting one operator to each management unit under DOC management and supervision.

We would add to that - **‘OPERATION RELOCATION’**, with the concept that the majority of mature bulls be relocated to safari parks / game farms / tahr farming operations as part of the management package to supply the commercial hunting industry in the future. This would save the tragic waste of resource as is happening at the moment and gain some order of common sense with the commercial hunting industry, the public and the tax payers.

It was confirmed at the meeting held on the 3rd August 2020 in Christchurch, DOC has the discretion (legally) under the act to do so and even Forest and Bird recorded they are happy with control – not elimination or extermination.

This type of approach was also endorsed by the Conservation Authority at the meeting.

Submission Signed by:  
[REDACTED]  
Mt Cook Trophy Hunting  
[REDACTED]



[REDACTED]

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**From:** [REDACTED]  
**Sent:** Wednesday, 5 August 2020 9:42 pm  
**To:** tahrconsultation  
**Cc:** Ben Reddiex  
**Subject:** Tahr plan

I [REDACTED] have been involved in WARO operations for over 40 years and shot and recovered thousands of Tahr and have culled thousands of Tahr as well for DOC and have been involved with the Tahr group since it started, I also fly [REDACTED] hunters in and out of DOC land hunting each year. WARO Operators would like to have Tahr put on the standard WARO permit so when out hunting and they come across Tahr they can shoot them, there needs to be times of the year when no Culling, no WARO and no AATH is allowed and this should be May June July when Bulls are rutting and many hunters in the hills, plenty of private land this could happen on in these months, No WARO or AATH or culling within 1 KM of Huts or known campsites, any non standard operation in the Parks needs to be advised to the user groups as per User Group requirements, DOC culling should be done in July AUG Sep when most hunters have finished and before nannies have kids, do the culling in July away from where hunters will be, Wilderness Tahr Blocks should start first weekend of May and finish 2<sup>nd</sup> weekend of July,

- 1 Put Tahr on normal WARO permit with conditions.
  - 2 DOC culling to be done July AUG SEP, July away from where there will be hunters.
  - 3 No culling, WARO or AATH within 1 KM of Huts or Known Campsites
  - 4 Wilderness Blocks should be 1<sup>st</sup> weekend May to 2<sup>nd</sup> weekend of July
  - 5 Any WARO, AATH or Culling to be advised to the User Group 24 hours before it is done.
  - 6 The more pressure that is put on Tahr the more they will move into the bush on the West coast
  - 7 More vegetation monitoring needs to be done
  - 8 Target nannies and kids not Bulls as this is what hunters are after.
  - 9 Consultation should have input into the Tahr Plan not just a tick in the box to say consulted
- Regards [REDACTED] WARO and helicopter operator.





# CONSERVATION AUTHORITY

TE POU ATAWHAI TAIAO O AOTEAROA

## Tahr Control Operational Plan 2020/21 - Consultation

SUBMISSION FROM THE NEW ZEALAND CONSERVATION AUTHORITY

Date	3 August 2020
To	<a href="mailto:tahrconsultation@doc.govt.nz">tahrconsultation@doc.govt.nz</a>
Name of organisation	New Zealand Conservation Authority
Contact Person	██████████ Executive Officer
Postal address	PO Box 10420, Wellington 6143
Telephone	██████████
Email address	<a href="mailto:nzca@doc.govt.nz">nzca@doc.govt.nz</a>

### The Legislative Basis for the New Zealand Conservation Authority submission

1. The New Zealand Conservation Authority (**NZCA**) was established under the Conservation Act 1987, with members appointed by the Minister of Conservation. It is an independent statutory body with a range of functions, but primarily acts as an independent conservation advisor to the Minister and the Director-General of Conservation.
2. The NZCA has a growing role as an objective advocate on matters of national significance and interest in the conservation arena and provides high quality independent advice to the Minister of Conservation and to the Department of Conservation (DOC) on its strategic direction and performance.
3. The NZCA has a range of powers and functions, under the Conservation Act 1987, as well as under other conservation related legislation. Under the Conservation Act, section 6C(2)(c), the NZCA has the power to “advocate the interests of the NZCA at any public forum or in any statutory planning process.”
4. The NZCA also has a function under section 18(g) of the National Parks Act 1980 “to give advice to the Minister or the Director-General on any matter relating to any national park”.
5. Among the NZCA’s statutory functions are the approval of conservation management strategies, conservation management plans and national park management plans, and review and amend such strategies and plans. These constitute the key management documents for directing conservation effort and resources in New Zealand. Many of these documents have objectives, policies and outcomes relating to the conservation of native species and predator control.
6. The NZCA has participated in the Tahr Plan Implementation Liaison Group meetings over the last two years.

7. Following the logic of the above powers and functions, the NZCA submits on the Tahr Control Operations Plan 2020/21 and appreciates opportunities to provide feedback on how this will be achieved.

## NZCA Submission

8. The NZCA submission is based on their analysis of:
  - Tahr Control Operational Plan 2020-2021
  - Himalayan Tahr Control Plan 1993
  - Conservation Act 1987
  - National Parks Act 1980
  - Wild Animal Control Act 1977
  - Conservation General Policy 2005
  - West Coast Conservation Management Strategy
  - Canterbury (Waitaha) Conservation Management Strategy
  - Aoraki/Mt Cook National Park Management Plan
  - Westland/Tai Poutini National Park Management Plan
9. **The NZCA strongly supports** the Department of Conservation's Tahr Control Operational Plan 2020-21.
10. The Department's Annual Tahr Control Operational Plans seek to achieve the targets set in the Himalayan Tahr Control Plan 1993 (**HTCP**), prepared under section 5(1)(d) of the Wild Animal Control Act 1977. These annual control plans are devised after advice from Ngāi Tahu, the hunting sector, and the Tahr Plan Implementation Liaison Group, and so reflect the efforts of the HTCP to achieve a balance between human activity and the health of the environment. A balance that can be achieved when the tahr population is at 10,000 across the feral range.
11. **The NZCA supports** the priorities listed in the Tahr Control Operational Plan (**TCOP**) 2020-21 and offers comment below.

### Priority: Zero density in National Parks

12. **The NZCA strongly supports** the 2020-21 priority to take the Aoraki/Mount Cook and Westland Tai Poutini National Parks towards zero density.
13. National Parks provide a safe haven for Aotearoa's native species, and the Department of Conservation has not only a moral, but a legal obligation to ensure that this protection is robust.
14. The extermination of tahr in the National Parks is consistent with the National Parks Act 1980, the General Policy for National Parks, and the Management Plans of both the Aoraki/Mount Cook National Park and the Westland Tai Poutini National Park.
15. Himalayan Tahr were introduced to New Zealand in 1904, and so our native flora are ill equipped to defend against these grazing mammals. The grazing behaviour of tahr damages endemic flora, such as Tall Tussock, Mount Cook buttercup, NZ Veronica, and Godley's buttercup, which is classed by the NZ Plant Conservation Network as threatened and nationally endangered. This damage has lasting implications for a variety of fauna including insects, moths, birds, and alpine lizards.
16. With the impending escalation of climate change effects, we must do all we can now to ensure that these endemic and native species are provided the protection assured to them under the status of National Park.
17. Previously, the Department have compromised the intrinsic value of our National Parks for the appeasement of the hunting sector; so the NZCA is pleased to see that the

proposals within this plan realign the Department's legal and moral obligations to the Aoraki/Mount Cook and Westland Tai Poutini National Parks.

18. The National Parks comprise 21% of the tahr feral range, and so there is significant alternate opportunity for tahr hunting in New Zealand to continue across 558,000 hectares of public conservation land.
19. In addition to this, and prior to Covid-19, location data from Aerial Assisted Trophy Hunting concessionaires reveals that an average of only 67 bull tahr were declared shot per year in these two National Parks over the last five years. The hunting tourism industry that takes place within National Parks, is a niche one, for which the ecological sacrifice cannot be justified.

### Priority: Recreational hunting, guided hunting, and commercial recovery

20. **The NZCA supports** the priority to maximise efficacy of population reduction through recreational hunting, guided hunting, and commercial recovery.
21. It will be important for the Department to work with the hunting sector on public conservation land, private land, and pastoral lease land in order to fully realise the current population levels and to reach those specified in the HTCP. There may be opportunity to offer employment opportunities to those hunters affected negatively by Covid-19.

**The NZCA submits** that: the Department explore potential employment opportunity through the Jobs for Nature initiative in order to utilise professional and commercial hunters who have been negatively affected by the Covid-19 pandemic, to achieve tahr population levels as specified in the HTCP.

### Priority: Bring populations towards levels in the HTCP

22. **The NZCA supports** the priority to bring populations towards levels in the HTCP by focusing on localised areas of high density of tahr and on areas where tahr have mobbed up, thus protecting natural values at place.
23. There are contemporary factors to consider when assessing the control needs for tahr in 2020-21. The impacts of Covid-19 have already had significant effects on control and monitoring operations planned between March and May 2020. Covid-19 will continue to require severe border restrictions, and so will continue to impact the international market and hunting tourism industry for an undetermined amount of time. This is an unprecedented situation and warrants the intervention of the Department to undertake control operations.
24. Controlling tahr numbers in National Parks to the lowest practical densities, as far as possible, and to a maximum of 10,000 across the feral range, as stipulated in the HTCP, will provide opportunity for Aotearoa's biodiversity to thrive, ensuring the enjoyment of the National Parks, and the Southern Alps for generations to come.

### Priority: Establish the size of populations off PCL

25. **The NZCA supports** the priority to establish the status of tahr populations off public conservation land.
26. The populations of tahr on private and pastoral lease land is currently unknown. It will be critical to the ongoing control of tahr, for the Department to understand these population densities and trends.

### Research and monitoring

27. **The NZCA strongly supports** the work proposed to develop an integrated research and monitoring programme.

28. The HTCP recognises the need to continue to monitor and undertake further research. This will enable the Department to accurately assess the impacts of tahr control environmentally, culturally, and economically.

**The NZCA submits** that: the development of an integrated research and monitoring programme should appear as a priority in the Tahr Operational Plan 2020-21.

### Concluding Comments

29. The NZCA have delivered consistent advice to the Minister of Conservation on this matter, as can be seen in the attached public correspondence dated July 2018, April 2019, and July 2020. The NZCA has consistently highlighted the rising numbers of tahr and the expanding feral range as major concerns, and have advocated for many of the actions now stated in the TCOP 2020-21 to come into effect in previous Control Operational Plans.
30. The TCOP 2020-21 displays a tangible intent to fully understand the extent and impacts of tahr populations in New Zealand. There is a focus on striking the balance between ecological health, and achieving sustainable hunting practices.
31. The NZCA give their full support to the policy of total control of all tahr within the National Parks, and continued efforts to achieve a tahr population level and feral distribution in accordance with the HTCP.

NEW ZEALAND

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**CONSERVATION AUTHORITY**  
TE POU ATAWHAI TAIAO O AOTEAROA

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26 July 2018

Hon Eugenie Sage  
Minister of Conservation  
Parliament Buildings

Dear Minister

**THAR MANAGEMENT**

At the Authority's June meeting, DOC presented the Himalayan Thar Control Plan 1993 (HTCP) annual report for the 2016-2017 year. It was very troubling to learn the estimated total population of thar is now at 35,634, well exceeding the maximum density of 10,000 animals specified in the HTCP, and also their expansion beyond the feral range. We are aware that in recent weeks DOC has spent \$70,000 and culled 3,000 thar, a great first step, but extra funding will be needed to keep this momentum.

Following a discussion of the report, the Authority noted with concern an example of a pastoral lease property, outside the allowed range, which does not allow DOC contractors access to cull thar. The Authority noted that the Crown has a right to interfere on pastoral lease land, with the good husbandry clause of the Land Act 1948, if the land is being degraded to an unreasonable extent and where wild animals are not being controlled. We would suggest that DOC's legal team could provide more advice on this matter, as there is currently a \$20,000 annual 'work-around' cost for the taxpayer.

The Authority recommends an immediate reduction in thar numbers, with initial focus on removing animals outside of the feral range. We have requested from DOC that the 2018-2019 Operational Plan for Thar Control is available at our next meeting in August, and that a review is conducted and made available to present to the Authority at our December 2018 meeting, along with a timeline of actions and milestones so we are able to monitor progress.

Please see attached an Authority paper prepared in June 2018 which provides a broader context on the problem, the challenge and the solutions. If you would like to discuss this further, please feel free to contact me.

Yours sincerely



Chair, NZCA

Cc D-G Conservation – Lou Sanson

Encl.

NEW ZEALAND

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**CONSERVATION AUTHORITY**  
TE POU ATAWHAI TAIAO O AOTEAROA

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2 April 2019

Honourable Eugenie Sage  
Minister of Conservation  
Parliament Buildings

Dear Minister

**MANAGEMENT OF HIMALAYAN TAHR 2019**

At our February 2019 meeting, the NZCA received the DOC 2017-18 annual report for the Tahr Management Plan. This was discussed in detail by the full Authority, and we provide a response to you with our views. The Authority understood the background to the suspension of the Tahr control programme [REDACTED], and we are very pleased that the programme has now recommenced. We welcome your commitment to implementing the programme with the goal being to bring tahr numbers down towards the agreed level in the Tahr Management Plan.

- 1. Tahr Census:** We are pleased that the latest report tightens up the total population estimates on Public Conservation Land to the 35,000 level. The margin of error is much less than the 50% margin of error figure previously suggested to us in DOC's 2016-17 report. There is more confidence that this high population figure is the accurate number. We are also very surprised to be advised that the total tahr population could be in excess of 50,000 animals with the addition of tahr numbers on pastoral lease land (administered by LINZ) and private land (where the Wild Animal Control Act applies). This makes it vital for a coordinated approach to lowering the number of tahr to the agreed 10,000 population in the Tahr Plan across land of all tenures. This will help prevent infiltration by tahr into DOC managed areas with lowered populations from high tahr density areas outside public conservation land.
- 2. Pastoral Lease Land:** The NZCA welcomes the Government announcement halting the tenure review process and advising that pastoral lease land will remain under Crown ownership in the long term. The new policy means that pastoral lease land will in future be more tightly managed for a range of sustainable land management purposes including nature conservation. This also provides clear policy direction for LINZ staff. In future LINZ staff will have a much stronger mandate where there are uncontrolled tahr numbers on pastoral leases located outside the agreed feral range for tahr defined within the Tahr Plan.
- 3. National Parks:** Because the total tahr population is recognised to be around 5 times the agreed total population level in the Tahr Plan, and because under the National Parks Act there is a zero tolerance level for tahr within National Parks, **the NZCA considers that DOC funded tahr control activity within National Parks should now aim for removal of all tahr, and not just the removal of nannies and kids while leaving bulls behind.** Reduction in tahr numbers to the agreed level will now require a major taxpayer investment in conservation within the Parks and elsewhere. When DOC funded tahr control operations occur within the National Parks, primarily Aoraki/Mt Cook and Tai Poutini/Westland National Parks, it would be most efficient for those operations to shoot all tahr encountered during the tahr hunting flights. The NZCA believes that it is vital that there exist some areas of the high Southern Alps that are unmodified by tahr. Here native plants and animals can remain unmolested by introduced pests. That was always the intent in the establishment of National Parks. The inability by DOC and the hunting community to control tahr numbers in accordance with the Tahr Plan has undermined that statutory obligation contained in the National Parks Act.

4. **Taonga Species at risk:** NZCA member and Ngai Tahu appointee [REDACTED] registered the interest of Ngai Tahu in overseeing the implementation of the tahr control operation. [REDACTED] noted that taonga species listed under the Ngai Tahu Settlement Act 1998 are at risk because of unacceptably high tahr numbers causing damage to the alpine plants and habitats. [REDACTED] also supported the recovery of tahr carcasses for a game meat operation, if this was possible and economically efficient, to avoid wastage of the meat.
5. **Expansion of Range:** NZCA strongly supports every effort being made to eliminate tahr outside their previous “feral range” defined in the Tahr Plan. NZCA views with major concern tahr populations within Mt Aspiring National Park south of the Haast Pass and significant tahr populations on pastoral lease and conservation lands that adjoin Fiordland and Arthur’s Pass National Parks. NZCA also recognises that the natural values of many South Island Conservation Parks and Conservation Areas are threatened by elevated and expanding tahr populations.

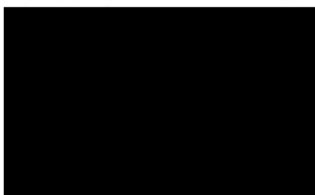
**The Conservation Parks all within the present and expanding range of tahr total over 1 million hectares and include from north to south**

- Craigieburn Forest Park.
- Korowai-Torlesse Tussockland Park
- Hakatere (Ashburton Lakes) Conservation Park
- Te Kahui Kaupeka (2 Thumb Range) Conservation Park
- Ruataniwha (Ben Ohau-Hopkins-Dobson) Conservation Park
- Ahuriri Conservation Park
- Hawea (Hunter Valley) Conservation Park
- Oteake (Hawkdun-St Bathans) Conservation Park
- Te Papanui Conservation Park.
- Kopuwai (Old Man Range) Conservation Area
- Taka Ra Haka/Eyre Mountains Conservation Park
- Mavora Lakes Conservation Park.

Thank you Minister for the opportunity to present our views on the future management of Tahr, to ensure that in future this complies with the provisions of the Tahr Management Plan.

No reira

E noho ora mai



Chairperson NZCA

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**CONSERVATION AUTHORITY**  
TE POU ATAWHAI TAIAO O AOTEAROA

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1 July 2020

Hon Eugenie Sage  
Minister of Conservation  
Parliament Buildings  
Wellington 6011

Tēnā koe Minister

**Tahr Management in Aoraki Mt Cook and Westland Tai Poutini National Parks**

At the Authority's June 2020 meeting, the progress in implementing the revised Himalayan Tahr Control Plan 1993 (the Control Plan) was discussed. Underway for the last 2 years, this revised implementation seeks to reinstate the management of tahr so that their population size and distribution is in accordance with the Control Plan.

The Authority continues to participate in Tahr Liaison Group meetings, where we have been briefed on the expansion in range of tahr and the large increase in numbers of tahr to at least 3-4 times the maximum population of 10,000 allowed for in the Control Plan. We are also aware of determined efforts that have been made by the Department of Conservation and the private sector to reduce tahr numbers throughout their feral range and beyond the defined extent of this feral range. We commend all those involved in these control efforts, however there is still a long way to go to reduce numbers to the agreed level in the Control Plan.

The Authority wrote to you on 2 April 2019 voicing our concerns about the population and distribution of tahr and included this reference to the proposals in the 2018-2019 tahr control operations:

***National Parks:*** *Because the total tahr population is recognised to be around 5 times the agreed total population level in the Tahr Plan, and because under the National Parks Act there is a zero tolerance level for tahr within National Parks, **the NZCA considers that DOC funded tahr control activity within National Parks should now aim for removal of all tahr, and not just the removal of nannies and kids while leaving bulls behind.** Reduction in tahr numbers to the agreed level will now require a major taxpayer investment in conservation within the Parks and elsewhere. When DOC funded tahr control operations occur within the National Parks, primarily Aoraki/Mt Cook and Tai Poutini/Westland National Parks, it would be most efficient for those operations to shoot all tahr encountered during the tahr hunting flights. The NZCA believes that it is vital that there exist some areas of the high Southern Alps that are unmodified by tahr. Here native plants and animals can remain unmolested by introduced pests. That was always the intent in the establishment of National Parks. The inability by DOC and the hunting community to control tahr numbers in accordance with the Tahr Plan has undermined that statutory obligation contained in the National Parks Act.*



You responded to us on 8 May 2019 advising that the formal tahr control operations in 2018-2019 would not include shooting Bull Tahr in the national parks, but “the control of tahr in National Parks will however be a key consideration in establishing the detailed plan for tahr management post 30 August 2019”.

We understand that the revised plan now calls for the shooting of all tahr in the National Parks including bulls. We also note that National Parks make up a minority of the area of the tahr feral range.

The Authority would like to give its full support to the policy of total control of all tahr within the National Parks and continued efforts to achieve a tahr population level and feral distribution in accordance with the 1993 Himalayan Tahr Control Plan.

No reira

E noho ora mai



Chairperson NZCA





## **NZPHGA Submission on DoC Tahr Control Operational Plan 20/21**

The NZPHGA strongly opposes the extent of the proposed 2020/2021 Operational Plan and the rushed manner in which it is being actioned without a robust assessment of the current state of the tahr herd or modelling and population projections on what the herd will look like after the proposed operations are complete.

We value our native biodiversity and have always supported and played an integral part in tahr population control. We understand culling is necessary.

In the last 3 years we have collectively killed well over 18'000 tahr (Note 1). Right now none of us know quite what the tahr herd looks like with regard to population, densities and demographics.

There should be no rush to charge blindly ahead reducing the tahr population further without pausing to establish where the tahr population is at and modelling what the herd is likely to look like after any planned intervention.

To us it looks like the Minister and the Department have simply received a very large budget as part of the Government Covid splurge and have resolved to kill as many tahr as they can without pausing to monitor where the herd is currently at, without modelling what the herd will look like after this intervention and without due consideration to the hunting sector - one of the largest commercial and recreational user groups of the Conservation estate. Nor have they considered the cultural and social implications of this.

While the Department hasn't stated an intent of eradication across the feral range, hunters have genuine fears that the current approach is the thin end of

the wedge in this regard. The anti-introduced species ideology of the current Minister is well known to the hunting sector. We have witnessed her strong views on this for over 20 years. We feel that much of the current approach of the Department with regard to this ideology based- non-scientific approach to tahr management is largely due to the Minister's agenda which contradicts and obstructs the Department's usual consultative approach. Why else would the Department be rushing the culling of large numbers of tahr before the election without the science, research or modelling to back it up. The Minister and the Department are riding roughshod over the hunting sector. Our livelihoods and our way of life are under threat. The hunting sector in tatters would represent the loss of an important conservation partner.

The Department of Conservation have an obligation under the 1993 Tahr Control Plan to base intervention on science and research. With sound science, research and monitoring we believe we can collectively manage a sustainable tahr herd that meets the needs of the hunting sector while providing positive conservation outcomes for our native biodiversity.

We hear anecdotal claims of the damage tahr do to certain native alpine plant species, but we are yet to see the science to back these claims. We know tahr eat native vegetation but we don't know at what densities this is at an unacceptable level with regard to many of the specific plant species. Let's get some facts and manage tahr densities around science area by area.

Under any such management program the economic and intrinsic value of the tahr resource must be factored in. 166'000 New Zealanders hunt. Hunters are arguably the largest user group of our National Parks and Conservation Estate. DoC must not forget its mandate to foster recreation on our public land. Hunting is a legitimate recreational and commercial activity and New Zealand enjoys a reputation internationally as a premiere hunting destination.

Tahr are listed as a near threatened species on the IUCN Red list. New Zealand is the last stronghold of tahr in the world. As a comparison, the global population of white rhino is estimated at around 18'000, far more animals than there are tahr in their native range. If New Zealand had a wild population of white rhino would we be culling them indiscriminately, without sound science to back it up?

In my industry - the commercial guided hunting industry a sustainable tahr herd is vital to our livelihoods and the rural communities where we operate.

The commercial guided hunting industry in New Zealand brings in over \$100 Million of direct overseas revenue annually. Tahr represent something over 20% of this value.

The true value of the tahr resource to our industry however, is more than just its raw monetary value. Tahr are an important drawcard species for the guided hunting industry. While international hunters can hunt red stags, our highest value species, in a number of counties around the world, they can only realistically hunt tahr in New Zealand. Many international hunters book their red stag hunt in New Zealand because they can also hunt tahr here. Without a viable tahr herd our industry stands to lose not only the revenue associated with tahr hunting, but also a significant portion of the revenue derived from the other high value game animals our visiting tahr hunting clients hunt while here on their tahr hunt including our lucrative private land game estate red stags.

Our industry directly employs 470 people in full time or seasonal employment and a further 64 people in the associated taxidermy and trophy exporting services.

At the 19<sup>th</sup> of June TPILG Meeting James Holborow stated that substantial impact to the commercial hunting industry will not occur as a result of the proposed operational plan. This is simply not true. Our industry will be severely impacted by the projected reduction in the tahr herd if the full extent of the proposed operational plan is carried out.

Our industry is currently facing extraordinary circumstances due to the closed border as a consequence of the global Covid-19 situation. Our international hunters, who make up over 95% of our client base, and more in terms of value, book 12 months, 2 years or more in advance. The vast majority of our 2020 booked hunters have deferred or rescheduled their hunts until after the border opens. We are currently still taking strong booking enquiries from overseas. When the borders reopen we are going to have a strong influx of overseas hunters. These guys and girls are going to kill a lot of tahr.

We've been told by the Department that a significant reduction in the tahr population on Conservation land won't be detrimental to the commercial guided hunting sector because most of our animals are hunted on private land or pastoral leases. While it is true that many of our members who guide foot hunts do chose to operate on private land or pastoral lease land due to a

degree of exclusivity and a higher degree of management, overall, the majority of our tahr hunts are conducted on Conservation Land. Many of our operators, particularly the larger businesses tend to do most of their tahr hunts as AATH. AATH is conducted almost entirely on Conservation Land, much of it in the National Parks.

To compound our fears we see the Minister and the Department looking at tahr populations on pastoral lease and private land. It's difficult for us to be relaxed about aggressive control operations on Conservation Land when we see the Minister and the Department eyeing tahr on other land tenures. The result of a marked reduction in trophy bull and breeding populations on pastoral lease and private land will see increased hunter competition for a severely diminished trophy bull resource on Conservation Land.

Numbers of tahr taken by commercial operators on Conservation land is trending up annually. Currently around 360 per year according to DoC concession return data.

The total value of each mature bull tahr represents \$14000 to the commercial hunting industry. This is the sum of the trophy fee, guiding fees, lodging, taxidermy and trophy export.

DoC has fostered the establishment of businesses around the tahr resource and has profited from concession fees and AATH offsets. Many successful businesses have been established and enterprising New Zealanders and their families have based their lives around the tahr resource.

A couple of examples from our NZPHGA membership that come to mind:

A young guide who has recently located [REDACTED] to Twizel. They have bought a couple of acres of land and built a house. They have chosen this location because almost their entire business is based around guiding wilderness tahr hunts on Conservation Land. Without a viable public land tahr herd, their business will not be viable and job prospects for them in the Twizel area will be tough.

Another example is a [REDACTED] guide who has recently left a lucrative [REDACTED] contracting career and borrowed to purchase a [REDACTED] wilderness hunting outfit focused primarily on public land tahr. [REDACTED] face an uncertain future without a viable Conservation Land tahr herd.

I could reel off scores of other examples of guides and outfitters who's businesses are dependent on a viable tahr herd. Some multi-million dollar businesses who's futures are dependent on the arrival of their booked overseas hunters when the borders reopen. Without a viable tahr herd these booked hunters may chose not to come and deposits will have to be refunded. Businesses will fail.

Then there are the taxidermists and exporters who's businesses are dependent on our overseas tahr hunters, and the helicopter operators who provide the air transport.

The industry needs to be able to adjust to any changes to the tahr herd dynamic incrementally. Any control intervention that will have a serious effect on the herd must therefore be implemented incrementally so that the industry can adapt. Such a dramatic impact on the tahr herd within a short period as would be expected from the proposed operational plan is unreasonable and unnecessary to be carried out in such a dramatically short timeframe, particularly when considering the 18'000 + animals already killed in the last 3 years. There is no rush to further reduce the population before establishing where it is at currently.

This on top of the impacts on the industry of Covid-19 and closed borders the level of proposed culling will place considerable financial stress on many businesses. While the Government is handing out financial support to other sectors, the commercial hunting sector has received no support and it seems that the Minister and the Department are intent on driving nails into the coffin of the hunting industry.

A follow through of the second 125 hours of the proposed operational plan without adjustment and due consideration of the hunting sectors recommendations or concerns will be damaging to DoC's relationship with landowners and hunters. For many years hunters have worked with DoC on conservation programs including predator control programs, trapping and in a partnership on wild animal control. Hunters and hunting groups are likely to turn their backs on any goodwill they've held toward DoC and the conservation partnerships we've seen fostered over the years. Already we are seeing examples of private land owners who have had long standing relationships with DoC and have in good faith allowed unhindered vehicle access by DoC staff across their land - now writing to the Director General stating that those

arrangements are on hold and DoC staff will not be permitted to travel across their property until a proper consultation process is completed.

We've seen comments from the Department and Forest and Bird stating that the hunters haven't controlled the tahr. While in fact, hunters ability to do so and to be recognised as doing so lies with DoC. Recreational hunter tahr kills have not been recognised by the department. These numbers are considerable. Hunter helicopter transport access to National Parks and Wilderness Areas continues to be extremely limited. The answer to increased hunter control of tahr numbers is increased landing access to these remote areas. Hunters need a lot of gear - heavy optics, rifles, cape salt, etc. They also have a lot of additional weight to carry out - meat, skins and capes, horns. They are not going to routinely walk considerable distances in rugged terrain carrying all of this plus camp and personal equipment into their campsite. Increased helicopter landing access in national parks and wilderness areas is the answer to enable hunters, both commercial and recreational to kill more tahr. We understand that this needs to be managed around other Park and Wilderness Area users requirements of peace and quiet. Hunters don't need unfettered helicopter access to these areas, but a managed, limited system that works for all users is achievable. Perhaps on a seasonal basis for example - limited landing access over and above the Ballot system access during Autumn and Winter, leaving the trampers in quiet peace during the Summer.

We recommend that the remainder of the current operational plan control effort should be focused on tahr populations outside of the feral range and in the exclusion zones. Limiting spread outside of the feral range should be the highest priority. 'A stitch in time saves nine'. The judas program outside of the feral range should be utilised to its full potential.

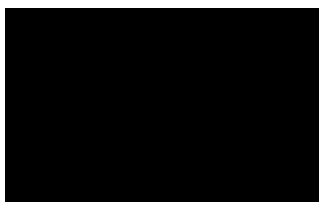
Due to the 18'000 + tahr killed over the last 3 years plus those additional numbers killed in the National Parks in the initial 125 flying hours of the current operational plan we recommend that no further control work is carried out inside the feral range until a comprehensive monitoring program is undertaken to establish where the herd is at currently.

The NZPHGA supports the research initiative currently underway [REDACTED] [REDACTED] on contract to the Department of Conservation and recommends that future operational plans are based on research of the herd and area specific impact on vegetation as required under the 1993 Himalayan Tahr Control Plan



- with the economic and inherent value of the tahr resource factored into the equation.

Any of the current budget not used in planned flying hours should be directed into research.



President  
NZPHGA

3<sup>rd</sup> August 2020

Note 1:

- Recorded number of tahr killed between 1<sup>st</sup> July 2017 - 30<sup>th</sup> June 2020: 18'263.
- Recorded number of tahr killed between 1<sup>st</sup> July 2018 - 30<sup>th</sup> June 2020: 13'140.

These figures do not include tahr killed to date in the 20/21 control operations or recreational hunter kills or landholder management culls (Pastoral Lease and private land). These numbers are unknown but would be expected to number in the thousands.





Game Animal Council  
NEW ZEALAND

# **Tahr Control Operational Plan 2020/2021**

**Game Animal Council submission**

**August 5<sup>th</sup> 2020**

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## Game Animal Council functions

The Game Animal Council is a statutory agency established under the Game Animal Council Act 2013. The Council's functions under the Act include:

- advise and make recommendations to the Minister
- raise awareness of the views of the hunting sector
- liaise with hunters, hunting organisations, representatives of tangata whenua, local authorities, landowners, the New Zealand Conservation Authority, conservation boards, and the Department of Conservation to improve hunting opportunities:

In her letter of expectation, The Minister of Conservation has directed the Game Animal Council to work with the Department of Conservation and others to develop a plan that will support DOC to bring the tahr population within the limits of the 1993 Himalayan Thar Control Plan (HTCP). The Minister has also requested the GAC recognise the interests of hunting sector stakeholders, the significance of biodiversity, and the need to avert decline in indigenous species. The Minister has asked the GAC to continue to manage competing interests and to nurture the goodwill of the hunting sector towards conservation.

The purpose of the current consultation is to assist with design of the 2020/2021 annual operational tahr plan that contributes towards achievement of objectives specified in the HTCP. To that end, this advice addresses only the 2020/2021 operational plan (Henceforth "Operational Plan"), which seeks to reduce tahr numbers on Public Conservation Land, and not the HTCP *per se*. However, the Council appends some points for context and consideration in future HTCP-related decision making.

## Department of Conservation Principles for operational plan development

In 2018 the Department proposed the following principles to guide development of annual operational tahr control plans. The TPILG wholeheartedly supported adoption of the principles. The GAC believes they provide a valuable guide to finalisation of the current operational plan.

### ***Principle One: Partnership***

The Department of Conservation (DOC) has an active co management partnership with Ngāi Tahu under the Principles of Te Tiriti o Waitangi, strengthened further by the Ngāi Tahu Claims Settlement Act. The Department will operate in a programme partnership with all stakeholders to work together to achieve the outcome sought. Regular Tahr Plan Implementation Liaison Group meetings are held to update and share information and support decision-making.

### ***Principle Two: Status of the Himalayan Thar Control Plan 1993***

The Himalayan Thar Control Plan (HTCP) 1993 is the guiding statutory document under the Wild Animal Control Act 1977 for managing the tahr population.

**Principle Three: Phased approach to Implementation**

The control programme for tahr is to operate under a phased approach at a management unit scale:

control operations → monitor → report → review → revise if necessary

**Principle Four: Information sharing and transparency**

Data and information will be shared openly between all parties to achieve the objectives of the plan. The control and monitoring efforts of all parties are recorded and reported. The DOC website will display all the information collected by all stakeholders.

**Principle Five: Increased effort is required to meet the Plan objectives.**

The control effort will be undertaken, based on the following Himalayan Thar Control Plan objectives.

- A. To provide for recreational, commercial, guided hunting and Departmental control as means of maintaining tahr at, or below, target levels.
- B. Scientific information is the basis for assessing vegetation condition and tahr population to inform management decisions.
- C. To prevent expansion of the breeding range of tahr control activity outside of the feral range of tahr is a priority.
- D. The protection of known, high value, ecological sites which are at risk to tahr impacts with each management unit is a priority.
- E. Tahr will be controlled over time to a level at, or below, the intervention density set for each management unit within the HTCP as informed by scientific research and monitoring
- F. The most efficient and effective control methods for tahr population reduction will be used, including concerted effort by recreational and commercial stakeholders, and DOC control.

The Game Animal Council lauds the Operational Plan's intent to progress research into tahr-related matters that will be of significant assistance in guiding future operational plan development.

## DOC aerial tahr control

While the Operational Plan clearly identifies the quantum of DOC control activity (specified as hours of flying time), and the various groups who contribute to tahr control on PCL in each MU, there are several important omissions:

- Justification for the number of hours of DOC aerial control in each MU
- PCL tahr population targets for each MU
- Identification of, and reasons for, priority control locations within each MU
- Timing of DOC control operations

Clarification of these matters may have prevented some misunderstanding and would have formed a sound basis for discussion of the effects of the Operational Plan. A full agenda, and a focus on the overall quantum of proposed DOC control activity, at the previous TPILG meeting prevented discussion of these matters. The Council recommends that future draft operational plans should lay these matters out clearly, ensure there is adequate time prior to the TPILG for their consideration, and devote adequate time to their discussion at TPILG to consider the broad range of perspectives represented on the TPILG.

In its consideration of the implications of the Operational Plan, key items considered by the Game Animal Council, informed by consultation with the hunting sector, included:

- Where tahr density should be reduced
- The quantum of tahr density reduction
- The appropriate timing of tahr density reduction activities
- Who should control tahr
- Which animals to target

The Game Animal Council has considered three main evaluative criteria:

- The effects of tahr control on the natural environment
- The effects of tahr control on the hunting sector
- The effects of tahr control on future control requirements

## Previous engagement

The Department engaged with the Game Animal Council prior to release of the Department's original proposed plan. The Council's advice and opinions during that engagement were made on the expectation that the Department's operations would be of a similar scale to the 2019/2020 operations. The proposed plan that emerged subsequent to that engagement entailed a very large increase in Department tahr control activity, making the information the Council provided in the previous consultation largely irrelevant. The same will be true for other consultees. Consequently, it is the Council's opinion that the information the Department obtained from that earlier engagement activity should largely be set aside.

## Responsibility

The Council notes the strong public interest in tahr management resulting from recent and ongoing legal actions, which has generated heated opinions on both sides. Some commentators have opined, "hunters have failed". The Council refutes that rhetoric and wishes to see it corrected. The HTCP is clear where responsibility lies. With the exception of AATH offsets, the hunting sector does not have an obligation to monitor or control tahr numbers, the Department does. Despite that, the Tahr Interest Group has a long history of organising tahr culls at the participants' own expense in locations directed by the Department. Recreational hunters kill large numbers of tahr for which they do not receive recognition. The provisions in the HTCP that transfer responsibility for tahr control to hunters (Section 5.1) have never been applied.

The Game Animal Council Act provides an opportunity to change hunting sector responsibility through establishment of herds of special interest. The New Zealand Tahr Foundation was established with that express purpose. However, that opportunity has been removed against the hunting sector's wishes. Like many other objectives, COVID-19 has prevented the commercial hunting sector from removing bulls from the national parks this year, which was part of the 2019/2020 operational plan. That is not a failure by the hunting sector, it was completely outside their control.

Identification of the need for and effects of Departmental tahr control requires knowledge of all or some of the following at the Management Unit level, and in some cases at finer scale (location, for short):

1. The approximate density/number of tahr at that location now.
2. The approximate density/number of tahr (by demographic group) that Departmental control will remove from that location.
3. The density/number of tahr and herd demographics at that location after Departmental control.

## Operational Plan objectives

The HTCP specifies intervention densities for tahr in each of the management units. The Operational Plan proposes tahr density control only on public conservation land (PCL). Consequently, the Council's advice addresses the specific density in each management unit. The Council has established target tahr populations consistent with those densities and Manaaki Whenua estimates of the areas of PCL in each management unit.

The Council notes that work is progressing to guide future achievement of HTCP densities on land of other tenures, but control activity on those lands is not part of the Operational Plan.

## Stopping point

Should Departmental control occur, a "**stopping point**" for control is required for each management unit – essentially the intervention density. Effective implementation depends on availability of a near real-time measure of the remaining tahr density in each management unit. Stopping point identification was not a matter considered by the Game Animal Council in previous engagement because the Council's (erroneously) envisaged scale of operations for the 2020/21 year were at a level that did not trigger the need for a stopping point, whereas the scale of currently proposed operations does.

The current (Ramsey & Forsyth) tahr density-estimation method is not appropriate for near real-time population estimation because it:

- is extremely imprecise for the herd as a whole, but even more so at the management unit level (After 4 years of surveying (117 plots) the estimated population range divided by the mean for the various management units ranged from 1.1 to 2.46. For the first two years of data collection it ranged from 1.42 to 5.96)
- entails tahr counts from three, temporally-spaced, helicopter flights to each site
- depends on surveying a large number of sites
- entails long data-analysis delays



This presents something of a problem. Residual population estimation must be either (i) “seat of the pants”, based on live observation, which clearly has a number of issues, or (ii) based on some population projection that accounts for population additions and withdrawals and accounts for imprecision and uncertainties<sup>1</sup>. Population projection can be formal (it is a widely applied branch of science with an abundant academic literature, including numerous ungulate applications), or it can be informal.

The Department appears to have adopted an extremely simplistic form of informal population projection to justify its planned operations. Clearly, members of the hunting community are doing likewise and reaching different conclusions. Lack of robust population projections questions the ability of the Department to act appropriately in real-time. Later in this submission the Council offers its own population projections, based on parameters drawn from peer-reviewed scientific literature.

## Urgency

Department (and other) claims for urgency of action to reduce the tahr population draw on three matters:

1. An impending birth pulse
2. Exponential tahr population-growth rates of up to 28%
3. Threats to valued vegetation species (particularly *Ranunculus Lyallii*)

### **Birth pulse:**

The number of breeding females in the herd drives the number of births. Recent control activities, which have targeted tahr not identifiable as males, have substantially reduced the number of breeding females.

### **Exponential growth:**

The Department’s claim of exponential tahr population-growth rates of up to 28% contributes to the Department’s informal population projection, supposedly offered as an indicator of the effects of each “birth pulse”. Exponential growth does not go on forever and fauna populations more typically follow a sigmoid growth function for which the growth rate is highest at very low populations and declines to zero at carrying capacity. Dr Parkes has modelled population-dependent growth for tahr using such a sigmoid (logistic) function.

Scientific estimates of growth rates from various tahr populations fall in the range from zero to 28% in the absence of hunting. Some of those estimates include effects of immigration. Parkes (1988) used a “working figure” for the inherent growth-rate of 24%. However, in his logistic model growth at 24% applies only at extremely low densities when there are not many tahr to multiply, so the high growth rate is not a problem. It is impossible for a population to increase at anything near 24% if it is male dominated, as is now the case in the national parks, and increasingly elsewhere. The current tahr-population growth rate will be much less than 24%, particularly if the population is male-biased.

As well as additions (the birth pulse), population projections should account for all removals. While the Department considers recorded hunting mortality, two sources it excludes from consideration are unrecorded hunting mortality (recreational hunting) and natural mortality. Tahr do not live to an old age,

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<sup>1</sup> A further possibility, not yet explored in detail, is observations of changes in nanny/bull ratios subsequent to culling of known number of animals from particular demographic groups.

the estimated natural annual mortality rate for tahr kids exceeds 50%, and for mature female tahr is about 20% (Caughley 1967, 1970). The mortality rate for mature males, which seldom reach eleven years of age, is somewhat higher again<sup>2</sup> (Tustin *pers. comm.*).

### Threats to vegetation:

No evidence has been provided by anyone that tahr at current densities threaten any vegetation species. While tahr are known to have significant localised effects at very high densities (as experienced in the 1970s), research conducted since the implementation of the HTCP has not identified any specific threats. Despite claims of its imminent demise, the threat status for *Ranunculus lyallii* is “not threatened”. It is common, even where tahr densities are high. Diet studies have shown that *R. lyallii* is an extremely minor component of tahr diet, and is eaten much more by other herbivores. This claim, like those for other floral species, simply does not stand up to scientific scrutiny. At the TPILG meeting on 3<sup>rd</sup> August 2020, no-one made any claims that any species is in imminent threat from tahr.

The Game Animal Council agrees that tahr populations exceed intervention densities in some MUs, but concludes there is no imminent threat, either to the environment or of a significant population increase, that would support the need for urgent action. Consequently, there is no case for putting aside the phased approach of Principle Three: *Phased approach to Implementation*.

## Longer-term implications

Herd demographics determine future recruitment. Tahr are highly polygynous, so few males are required to service the females. Consequently, reductions in male tahr numbers have little, if any, effect on the number of births. Few female tahr breed until they are three years old, but each female will have several offspring during her life. Her female offspring will have several offspring. Furthermore, nannies have a significantly lower natural mortality rate than bulls.

To illustrate the importance of demographics, consider two absurdly extreme cases (i) a herd containing 100 adult females and 1 adult male, and a herd containing 1 adult female and 100 adult males. Assuming 100% breeding success the numbers of animals added to each herd in the birth pulse will be:

- (i) 100 births
- (ii) 1 birth

Clearly (abstracting from deaths, which will be lower in herd (i)), herd (i) will have an extremely high growth rate, whereas herd (ii) will be unable to sustain itself. Managing herd demographics can have a substantial effect and can contribute to long term population effects. Populations can continue to shrink after termination of control when control targets females. The corollary is that selectively targeting females and achieving target densities now will result in future populations significantly below target densities. In other words, there is no need for immediate target-density attainment if females are targeted and doing so sufficiently skews the sex ratio.

Culling nannies not only reduces the herd size now (as does culling bulls), but it has two future effects that are different to bull culling:

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<sup>2</sup> In over 5,000 autopsies completed by Ken Tustin, the oldest male was 14 years, the oldest female was 22 years. Median age at death for female tahr is 6 years (Caughley 1967)

- longer suppression of the population because nanny tahr live much longer (bulls not shot are more likely to die of natural causes than are nannies)
- a reduction in future recruitment (only nannies have kids and their productivity is essentially independent of bull numbers)

In other words, shooting a bull or a nanny is irrelevant if all that matters is how many tahr exist at the conclusion of this year's cull. That is extremely myopic thinking. Shooting a bull or a nanny has a highly significant differential effect on both the number of tahr existing in subsequent years, and herd demographics. Shooting a nanny reduces the future population by much more than one. A bull-biased population is better for hunters, reduces future population size, and reduces requirements for future control work.

**To summarise:**

- Any near real-time assessment of the current number of tahr in each MU is likely to be inaccurate and imprecise.
- The estimates for the tahr population in each MU for the period 2016-2019 are extremely imprecise (broad credible limits) and do not necessarily represent the populations at the end of the data collection period.
- There is incomplete information on additions and subtractions to each MU population during and since data collection for the Ramsey & Forsyth population estimates, making contemporary population projections difficult. However, sensitivity analysis can identify the importance of key assumptions in these models.
- There is no imperative for urgent population reductions.
- Controlling nanny tahr is the key to long-term population management and environmental effects.

The Council's conclusion is that the currently proposed scale of tahr control has the potential to overshoot the limits specified in the HTCP in some management units. These uncertain situations are where adaptive management is of particular benefit, suggesting a "go quietly, monitor, and adapt" approach, consistent with the department's principles. Control effort should focus on female tahr, but should recognise the effects on future recruitment and not go too far.

It is important to recognise that the target-density approach to allocation of culling effort does not take account of other criteria. The Council proposes the following hierarchy, consistent with the HTCP, to consider when deciding where to target tahr control. In order from highest importance these are:

1. places of particular environmental concern (which may not have particularly high tahr numbers, but where the environment is particularly susceptible to tahr)
2. tahr population hotspots
3. places where it is difficult for the hunting sector to harvest tahr and
4. overall management unit density.

The Operational Plan does not address any of these matters, although they may have played an important role in decision-making and simply not communicated. The Game Animal Council recommends these matters should be considered in finalising the Operational Plan, and they should be clearly communicated in future draft plans.

We now turn to consideration of tahr control at specific locations.

## National Parks (MU4)

It is obvious that tahr numbers in MU4 currently exceed those specified in the HTCP. However, significant tahr control in 2018 and 2019 (4,000 tahr not recognisable as bulls from an estimate of 7,666 tahr in 2016-2018) has had a major effect on population, herd demographics and reproductive capacity.

The Council sought to discuss the impacts of herd demographics and illustrated the importance of doing so in earlier engagement, an offer not taken up by the Department. The initial information provided by the GAC appears in Annex 2 of the material supplied for the current meeting. The information the Council supplied anticipated a significantly smaller amount of Departmental control than proposed in the Operational Plan, and focussed on the issue of killing bulls, so these projections offer limited information on outcomes if the current plan proceeds.

The HTCP enables the Department to kill bulls in the national parks, confirmed by the recent court ruling. However, the important question is not whether it is legal to kill bulls in the park, but whether it is desirable to do so. It is the Council's opinion that killing bulls would prolong the time taken to achieve the purposes of the HTCP. It would also create adverse effects for the hunting sector.

The Council reaffirms that shooting bulls has no effect on reproduction, which is the driver both of future environmental effects and the quantum of control required in the future. Leaving them, even temporarily, may avoid or reduce the need for future Department control of bulls.

Shooting bulls now has adverse effects for commercial and recreational hunters. Bulls are of high commercial value, which will be important for COVID recovery. The historic harvest of bulls from the parks is not a guide to annual bull harvest once the border opens because nearly all bookings have been carried forward, effectively doubling harvest upon re-opening. Attaining a bull tahr trophy in the stunning national park environment is an aspiration for many recreational hunters. In short, the bulls have high value to the hunting sector, but have little importance for future environmental effects. If time spent culling bulls reduces the number of nannies culled, there is a significant opportunity cost to the environment from culling bulls.

### **The strategy that hastens achievement of HTCP objectives in national parks is to cull as many nannies as possible.**

The Council notes the lack of scientific evidence to support the need for immediate culling of all tahr in the national parks. However, it notes a number of unsubstantiated claims in the media. An example is a claim that eliminating tahr in the national parks is necessary to protect the *Aciphylla* weevil. Since that extremely rare weevil is not found in either park, culling tahr in the parks will not have any effect on the weevil. Further, claims that tahr threaten *Ranunculus* and *Veronica* species in the parks are not substantiated by either the official threat status, or by scientific research. Consequently, there does not appear to be any environmental imperative to remove all tahr from the national parks immediately, even if the aim is eventual elimination.

Because of:

- the demographic effects,
- the opportunity cost of culling bulls,

- the lack of an environmental imperative to immediately eliminate all tahr from the national parks, and
- the recreational and commercial benefits to the hunting community from them harvesting the remaining bulls

**The Game Animal Council's advice to the Department is to avoid culling bulls in the national parks, and certainly to avoid "going out of the way" to do so.**

#### **Suggested focus locations**

1. True left of the Copland round to Misty Peak
2. True left bottom of Horace Walker
3. Douglas/Clue to Lame Duck Flat
4. True left of Callery
5. Waikukupa and Omoeroa faces
6. Cook River

About half of the proposed control hours in MU4 have been undertaken already. To allow hunters access to some tahr hunting in this MU, and for them to make a contribution to controlling bulls, the remainder of the control work in this unit should be postponed until June 2021. If bulls must be shot, and recreational hunters and guides are unable to do so in time, then it is most efficient to consider commercial uses of them, rather than shooting to waste.

**Where it prevents shooting to waste, the Council recommends consideration of commercial live capture, cape harvest, WARO or other uses from aerial harvest.**

#### **Tahr outside the feral range and in exclusion zones**

The HTCP wisely gives top priority to controlling tahr in these areas. Large and small tahr populations remain outside the feral range. They are a significant potential threat to treasured environments (such as Fiordland National Park). Range expansion and increases in tahr populations outside the feral range will result in significant future control costs for the Department. Benjamin Franklin's adage that an ounce of prevention is worth a pound of cure applies well in this situation. Containing and shrinking the perimeter is vital.

**The Game Animal Council recommends an expansion of tahr control effort outside the feral range, particularly in the south, and expansion of effort in the exclusion zones beyond the 168 hours last year.**

## Management Units outside the national parks

### Introduction

Alongside other place-related considerations, a primary focus in these management units is to attain the intervention densities. The Ramsey & Forsyth (2019) PCL tahr density estimates over the period 2016-2019 in these units are shown in Table 1.

Table 1:

MU	PCL area (km <sup>2</sup> )	Intervention density (tahr km <sup>-2</sup> )	N <sub>PCL</sub>	PCL: Lower credible limit (tahr km <sup>-2</sup> ) [N <sub>PCL</sub> ]	PCL: Central measure (tahr km <sup>-2</sup> ) [N <sub>PCL</sub> ]	PCL: Upper credible limit (tahr km <sup>-2</sup> ) [N <sub>PCL</sub> ]	Approx. number shot on PCL by DOC in 2019
1	939	2.5	2,347	4.8 [3,721]	8.1 [6,182]	13.4 [10,269]	2504
2	813	2.0	1,626	2.5 [2,033]	5.3 [4,357]	11.3 [9,335]	240
3	1,422	2.0	2,844	6.0 [5,142]	10.0 [8,663]	16.9 [14,596]	1526
5	802	2.5	1,604	3.8 [1,757]	10.8 [4,950]	30.3 [13,951]	1532
6	674	1.5	1,011	2.3 [1,552]	4.6 [3,096]	9.1 [6,176]	1094
7	593	1.0	593	0.1 [65]	0.3 [169]	0.7 [438]	57

- PCL areas are from Appendix 3 in Manaaki Whenua (2019) *Overview of the current state of tahr knowledge*. PCL = Area – (concessions + defence + freehold).
- Numbers of tahr shot by others in each MU are unknown.
- Excludes MU4, addressed in a previous section, and exclusion zones.
- Credible limit estimates cannot be added to provide “overall” credible limits.

To clarify the “gap” between PCL densities and intervention densities, the Council has estimated the PCL populations that are consistent with the HTCP intervention densities in each MU (using land area estimates from Manaaki Whenua) and compared those with the Ramsey & Forsyth population estimates. We also factored in recent control activity.

For example, the intervention density of 2.5 tahr km<sup>-2</sup> in MU1 multiplied by the 939 ha of PCL results in an “intervention population” of 2,347 tahr. Prior to the 2019 cull, this would have resulted in a “gap” of 1,374 tahr to the lower credible population limit, and a much bigger gap (3,835 tahr) to the central measure.

The Ramsey & Forsyth tahr population estimates cover four years, so whether they are representative of the population in 2019 depends on whether populations in each MU were static or not over that period. The data analysis did not assess that and, given the high variance in the data, and the relatively small samples within each MU each year, would be unlikely to shed light on existence, direction or magnitude of density change within MUs. Ramsey & Forsyth note that this may be possible with additional data in the future.

Departmental tahr control has occurred in all these management units in 2019, resulting in a significantly increased harvest in addition to “normal harvests”. In addition, some culling occurred in parts of MU5 in 2018. All Departmental control has targeted tahr that are not-identifiable as males, which will have reduced reproductive capacity disproportionately to the population reductions since the period the Ramsey & Forsyth estimates apply to.

The Council’s population projections are exploratory in nature. They make a number of assumptions, the significance of which can be tested by sensitivity analysis, but we have not done so. The projections start from the central population estimates, which are imprecise. They include known culling kills in 2019, but other kills are estimates, although generally small in comparison to DOC’s kills. Birth pulses are included, based on data from peer-reviewed scientific evidence, as is natural mortality.

The projections are sensitive to the estimates of DOC aerial mortality derived from helicopter hours. The Council has adopted the rate of 30 per hour the Department suggested at the June 2020 TPILG meeting. Kill rates are highly dependent on animal behaviour, snow conditions, time of year and other factors, so are extremely hard to predict, and are not a robust indicator of tahr densities.

The Department reports a somewhat higher kill rate than 30 tahr/hour in MU4 in July 2020. The AATH offset kill rate for 2019 was very much higher than that. Conversely, kill rates in low density and heavily vegetated areas are likely to be much lower. This factor, by itself is a cause for caution, with higher than anticipated kill rates having the potential to drive populations well below the intervention densities.

The Council welcomes the opportunity to work with the Department to explore variants on these assumptions if that would be of assistance.

It is important to allocate Departmental tahr-control effort, both within the management units and between units, to ensure the best environmental outcomes, to reduce future control costs, and to maximise benefits to the hunting community from the remaining tahr population. For all these reasons, control should target female tahr as far as possible. However, demographic effects are important, and mitigate against immediate attainment of HTCP-specified densities. Dramatic reduction in nanny numbers will, in some cases, result in continuing population decline, even without future culling. This means the HTCP target densities can be met in the relatively near future without culling to target densities level now. The Council is unaware of any imperative to attain the limits of the HTCP in the 2020-2021 year. Recognising that bull tahr need to be at least seven years old to attain trophy status, reduced recruitment from dramatic reduction in the nanny population will have unnecessary ongoing effects on trophy production for the next decade.

The Game Animal Council endorses the Department’s phased approach (Principle 3), which relies on monitoring after significant control work to assess the need for additional work. This is particularly important given the proposed scale of control in 2020/2021. The Council advocates monitoring effects of culling in management units 1 and 6 after the initial 125-hour program (noting that this initial phase is 50% more than the September-November 2019 program).

Recommendations for each management unit include reducing female kid groups to a maximum of 10. The Council notes some ambiguity about this criterion as groups form and disperse on a regular basis and there is no guidance on what defines a “group”.

There is considerable confusion about the maximum localised density of 5 tahr km<sup>-2</sup> because the area this density applies to has never been defined. One interpretation, inconsistent with the maximum group size criterion, is that any group of five breaches the local density criterion. This is clearly not what the writers of the plan intended. Past plans have ignored this criterion because it is unworkable. The Council recommends continuation of that practice.

There will be some transfer of recreational and commercial hunting pressure as a result of implementation of this plan, particularly with the effective loss of hunting opportunities in MU4. Claims that access to hunting on non-PCL areas will mitigate loss of PCL hunting do not recognise the difficulty and/or cost of obtaining access to non-PCL lands. MU1 and MU3, which are highly popular recreational hunting areas, will likely experience a significant increase in use. This increase in recreational use will increase recreational harvest, and therefore decrease reliance on DOC control.

The Game Animal Council recommends areas in MUs 1 & 3 that are readily accessible to recreational hunters do not receive DOC control, which should be concentrated on difficult to access areas within these MUs where recreational hunting has least effect.

There is considerable uncertainty about current tahr densities in each management unit. Culling has reduced the densities and changed the demographic structure of the tahr populations in those units. Consistent with the Department's staged approach (Principle 3) and adaptive management principles in general, the Council recommends monitoring the effects of the 125 hours of culling undertaken prior to finalisation of the Operational Plan. This is particularly important in MUs 1 and 6.



## MU1: South Rakaia/Rangitata

- The PCL lower credible limit estimated for the period 2016-2019 exceeds the PCL intervention density in MU1.
- If the R&F lower bound estimates applied, it is highly likely that with control activity to date MU1 is already below PCL intervention density. Anecdotal evidence suggests that is not the case.
- Population projections are based on the Ramsey & Forsyth (2019) central population estimate, assumed to apply in Autumn 2019 (N = 6,182).
- DOC culled approximately 2,500 female and juvenile tahr in this management unit in 2019.

Year	Start of the year			Harvests		
	Total Population estimate @ start of year	Recognisable bulls	Nannies & Juveniles	DOC N&J control	All recognisable bull kills	Non control Nanny & Juv kills
2019	6,182	1,034	5,148	2,504	200	200
2020	3,408	707	2,701	750	200	200
2021	2,378	444	1,935	0	150	200
2022	2,210	293	1,917	0	150	200
2023	2,084	187	1,897			
<b>PCL Target</b>	<b>2,347</b>					

- PCL control activity to date is unlikely to have attained the PCL intervention density at the central population estimate.
- Proposed control of 25 hours at 30 tahr/hour will result in removal of about 750 tahr not recognisable as males.
- This quantum of control is likely to reduce the PCL density to at or below the HTCP-target.
- A higher kill rate will almost certainly drive density below the HTCP-target.
- **Monitoring and an adaptive control strategy will be particularly important in this MU.**
- Demographic effects mean the tahr population will continue to decline in subsequent years.
- Target females, juveniles and non-identifiable males.
- Reduce female-kid groups to 10.

**The Game Animal Council recommends reducing the hours of control in MU1 pending monitoring of post-cull tahr density.**

### DOC aerial control location prioritisation

- Areas that are readily accessible to recreational hunters should not receive DOC control.
- Priority locations: difficult to access areas where recreational hunting has least effect.

## MU2: South Whitcombe/Wanganui/Whataroa

- The PCL lower credible limit estimated for the period 2016-2019 exceeds the PCL intervention density in MU2.
- If the R&F lower bound estimates applied, it is possible that with control activity to date MU2 is already below intervention density. Anecdotal evidence suggests that is not the case.
- Population projections are based on the Ramsey & Forsyth (2019) central population estimate, assumed to apply in Autumn 2019 (N = 4,357).
- DOC culled approximately 240 female and juvenile tahr in this management unit in 2019.

Year	Start of the year			Harvests		
	Total Population estimate @ start of year	Recognisable bulls	Nannies & Juveniles	DOC N&J control	All recognisable bull kills	Non control Nanny & Juv kills
2019	4,357	1,307	3,050	240	200	150
2020	3,849	910	2,939	750	200	150
2021	2,853	600	2,253	0	150	100
2022	2,803	424	2,379	0	150	100
2023	2,826	307	2,519			
<b>PCL Target</b>	<b>1,626</b>					

- Control activity to date is insufficient to have attained the PCL intervention density at the central population estimate.
- Proposed control of 25 hours at 30 tahr/hour will result in removal of about 750 tahr not recognisable as males.
- This is unlikely to attain the HTCP PCL target density immediately, but demographic change effects may result in attainment of the target density in the near future.
- A kill rate greater than 30 tahr/hour has the potential to drive the population to the intervention density.
- Target females, juveniles and non-identifiable males.
- Reduce female-kid groups to 10.

### DOC aerial control priority locations:

1. Aciphylla Creek faces
2. True left of Lambert Creek
3. Willberg Range around Avalon Peak
4. Adams Range northern faces
5. Bettison Faces
6. True left of the Perth below the Scone

## MU3: Gammack/Two Thumb

- The PCL lower credible limit estimated for the period 2016-2019 exceeds the PCL intervention density in MU3. Subsequent control activity has been insufficient to achieve the tahr population density specified in the HTCP.
- Population projections are based on the Ramsey & Forsyth (2019) central population estimate, assumed to apply in Autumn 2019 (N = 8,663).
- DOC culled over 1,500 female and juvenile tahr in this management unit in 2019.

Year	Start of the year			Harvests		
	Total Population estimate @ start of year	Recognisable bulls	Nannies & Juveniles	DOC N& J control	All recognisable bull kills	Non control Nanny & Juv kills
2019	8,663	2,599	6,064	1,526	200	300
2020	6,577	1,894	4,683	600	200	300
2021	5,557	1,377	4,180	0	150	300
2022	5,343	1,055	4,288	0	150	300
2023	5,242	835	4,406			
<b>PCL Target</b>	<b>2,844</b>					

- Proposed control of 20 hours at 30 tahr/hour will result in removal of about 600 tahr not recognisable as males.
- There were high kill rates in this MU in 2019, so there is every possibility that DOC will kill many more tahr than anticipated.
- This quantum of control is highly unlikely to attain the HTCP PCL target density.
- Target females, juveniles and non-identifiable males.
- Reduce female-kid groups to 10.

### DOC aerial control location prioritisation

- Areas that are readily accessible to recreational hunters should not receive DOC control,
- Priority locations: difficult to access areas where recreational hunting has least effect.

## MU5: Ben Ohau

- The PCL lower credible limit estimated for the period 2016-2019 exceeds the PCL intervention density in MU5.
- If the R&F lower bound estimates applied, it would be highly likely that with control activity to date MU5 is already below intervention density. Anecdotal evidence suggests that is not the case.
- Population projections are based on the Ramsey & Forsyth (2019) central population estimate, assumed to apply in Autumn 2019 (N = 4,950).
- DOC culled over 1,500 female and juvenile tahr in this management unit in 2019.

Year	Start of the year			Harvests		
	Total Population estimate @ start of year	Recognisable bulls	Nannies & Juveniles	DOC N&J control	All recognisable bull kills	Non control Nanny & Juv kills
2019	4,950	1,485	3,465	1,532	100	150
2020	3,030	1,060	1,970	300	100	150
2021	2,429	749	1,680	0	50	150
2022	2,257	567	1,690	0	50	150
2023	2,142	440	1,702			
<b>PCL Target</b>	<b>1,604</b>					

- Proposed control of 10 hours at 30 tahr/hour will result in removal of about 300 tahr not recognisable as males.
- This will not attain the HTCP target density on PCL but demographic effects will suppress recruitment.
- However, the Council understands there were high kill rates in parts of this MU in 2019, so DOC may kill more tahr than modelled in 2020.
- Target females, juveniles and non-identifiable males.
- Reduce female-kid groups to 10.

### DOC aerial control priority locations:

- Ben Ohau Range
- Neumann Range

## MU6: Landsborough

- The PCL lower credible limit estimated for the period 2016-2019 exceeds the PCL intervention density in MU6.
- If the R&F lower bound estimates applied, it would be highly likely that with control activity to date MU6 is already below intervention density. Anecdotal evidence suggests that is not the case.
- Population projections are based on the Ramsey & Forsyth (2019) central population estimate, assumed to apply in Autumn 2019 (N=3,096).
- DOC culled approximately 1,100 female and juvenile tahr in this management unit in 2019.

MU6 PCL	Start of the year			Harvests		
Year	Total Population estimate @ start of year	Recognisable bulls	Nannies & Juveniles	DOC N& J control	All recognisable bull kills	Non control Nanny & Juv kills
2019	3,096	929	2,167	1,094	50	50
2020	1,798	667	1,131	1,200	50	50
2021	432	432	0	0	10	0
2022	295	295	0	0	10	0
2023	200	200	0	0		
<b>PCL Target</b>	<b>1,011</b>					

- Proposed control of 40 hours at 30 tahr/hour will result in removal of about 1,200 tahr not recognisable as males.
- Low tahr density may limit the kill rate, although not in hotspot areas.
- This quantum of control is likely to eliminate all non-male tahr from MU6 by 2021.
- Remaining resident male tahr numbers will steadily decline thereafter.
- Some remaining males will emigrate to other MUS in search of nannies.
- Target females, juveniles and non-identifiable males.
- Reduce female-kid groups to 10.
- There are localised high-populations in this MU, where control should be targeted.

**The Game Animal Council recommends a substantial reduction in planned control in MU6 because the current proposal will reduce the tahr population well below the HTCP-specified target.**

### DOC aerial control priority Locations

- True left of Jacobs
- Parts of the Landsborough (e.g. Zora)

## MU7: Wills/Makarora/Hunter

- The PCL upper credible limit for MU7 is below the intervention density. However, it is not above the numerical limit specified in the HTCP, which is inconsistent with the target density.
- Tahr control is not required in MU7 to meet the HTCP PCL density objective.
- Population projections are based on the Ramsey & Forsyth (2019) central population estimate, assumed to apply in Autumn 2019 (N=169).
- DOC culled approximately 2,500 female and juvenile tahr in this management unit in 2019.

Year	Start of the year			Harvests		
	Total Population estimate @ start of year	Recognisable bulls	Nannies & Juveniles	DOC N&J control	All recognisable bull kills	Non control Nanny & Juv kills
2019	169	51	118	57	10	10
2020	88	31	57	600	10	10
2021	15	15	0	0	10	10
2022	3	3	0	0	10	10
2023	0	0	0			
<b>PCL Target</b>	<b>593</b>					

- Proposed control of 20 hours, even at a very low success rate, is highly likely to eliminate all non-male tahr from MU7.
- Tahr extermination occurs even if the 2019 tahr population was at the Ramsey & Forsyth upper credible limit
- The small number of remaining resident male tahr would die or emigrate over the next few years.

**The Game Animal Council recommends cancellation of the planned aerial control in MU7.**

## Concluding comment

Based on the central R&F population estimates, the biggest “surplus densities” are in MUs 2 and 3, where the bulk of culling should occur. Indeed, under all density/population estimate scenarios, the biggest reductions should occur in MU2 and MU3, with about 50% more harvest in MU3 than in MU2.

## Timing

The Operational Plan was silent on when operations would take place. Late winter/spring are the times when there is least disruption to the hunting sector, and other backcountry users. Snow conditions at these times facilitate culling.

Animal welfare considerations mean there should not be any control work from mid-November until the end of February.

Delaying remaining control work in MU4 to June 2021 is desirable. Significant reductions in tahr numbers in MU4, particularly of males, will mean there is little incentive for hunters to be there at that time, mitigating the adverse effects anticipated if control work were undertaken at that time in other MUs. It would also provide the opportunity for hunting in the interim.

Several recent DOC tahr control operations have resulted in DOC contractors shooting tahr in the immediate vicinity of hunters. A tahr hunting trip can be a major undertaking, and involves considerable planning and expense, so these encounters are particularly disappointing. There is also potential for disruption of other PCL users.

Better communications of dates and locations of aerial control activities would avoid many such conflicts. While it is recognised that weather and security mean it is not possible to identify precise dates of operations in particular areas, many of these effects can be mitigated, at least in part, by an indication of planned operation windows for particular locations or MUs. The Council notes some attempts to mitigate these effects by cull operators who have contacted other helicopter operators in the vicinity to avoid operating in areas where they have dropped clients. While meritorious, this approach fails to account for the vast majority of PCL users, who do not use aerial access.

## Tahr Kill Reporting App

The Council is concerned that conflict around adoption of the Operational Plan has resulted in loss of the goodwill the Department and the Council had worked hard to establish between the hunting community and the Department. Unfortunately, one of the casualties may be recreational hunters' willingness to use the tahr kill reporting app. This will significantly increase the difficulty of monitoring recreational tahr harvests, which the HTCP requires. It is in everyone's interests that the App has wide uptake. The Council will work with the hunting community to facilitate that. Adoption of the Council's recommendations contained in this submission will facilitate that process.







