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27 September 2018

DRAFT PROPOSAL

This is a draft proposal for reduction of tahr numbers offered as an alternative to a proposal from the Department of Conservation in letters from Andy Roberts dated 14 September 2018 and 18 September 2018. The Game Animal Council has developed this proposal in consultation with the Tahr Hunting Sector, and it has obtained broad support within that sector. It is not final, but is an early indicator of the hunting sector's preferred approach. The Game Animal Council provides this draft proposal to maximise the opportunity for consideration of it by the Department of Conservation prior to the Tahr Liaison Group meeting on Monday 1 October.

There is general acknowledgement that tahr numbers need to be reduced, but not in the manner or to the timetable set out in the original proposal. The original proposal has not found favour with the hunting sector because of the absence of strategy in the proposal to (i) mitigate effects on affected parties, (ii) maximise environmental benefits, (iii) minimise control costs, (iv) recognise constraints and opportunities for sector participants, (v) coordinate control efforts, (vi) apply specific control initiatives to places where they are most effective, and (vii) identify how management of tahr after the proposed cull will concurrently protect the environment and hunting.

In short, the original proposal places significant costs on hunting sector participants, but has no mechanism for them to benefit from participation. Consequently, the hunting sector is unwilling to support the original proposal.

The following section clarifies the thinking behind this position. An alternative strategy for tahr management that has attained significant support from the hunting sector then follows.

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The proposal lacks scientific rigour

The proposal is based on outputs (number of dead tahr), rather than on the outcomes prescribed in the HTCP that would ensure indigenous flora is in an acceptable state and that reasonable hunting opportunities remain for all hunters.

The proposal fails to recognise the current population estimate of 35,000 tahr on PCL has wide credible limits of plus or minus 18,000. This means the true number of tahr is most likely to lie between 17,000 and 54,000. It may not be necessary to kill the proposed number of tahr to comply with the plan, and it is certainly not necessary to do so immediately. What is more, while the proposal requires that tahr kill locations are documented, it provides no direction on where those tahr should be killed. This risks insufficient control in hotspots and, because the proposal does not identify the most at-risk conservation areas, it does nothing to ensure maximum conservation benefits from this considerable investment. It should also be noted that much of what was previously pastoral lease has been retired from much higher grazing pressure by Merino sheep.

The proposal will have immediate and catastrophic consequences for the guided hunting industry

Successive governments, tourism, hunting interests and the Department of Conservation have collectively promoted and profited from the increase in the use of the tahr resource. There are substantial businesses, many of which are DoC concession holders, reliant on use of the tahr resource.

The proposal will have both an immediate and ongoing catastrophic effect on the guided hunting industry and all of those businesses that industry supports including taxidermy, expeditors and freight forwarders, air transport operators, ground transport operators, accommodation and general tourism providers. One particularly hard-hit downstream sector will be taxidermy, because processing tahr trophies off public conservation land is a significant component of their income.

Many hunting guides and associated industries have millions of dollars invested in infrastructure and operational assets and already have hunters booked for 2019 and beyond. The revenue generated directly by each guided tahr hunt is estimated to be \$14,000, resulting in annual revenue for the 1100 trophies exported annually of \$15.4 million, with a large proportion of those coming from public land. Shooting bulls to waste forgoes significant income that could have been generated from tourist hunting if those

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bulls were available next winter. Paying to kill a valuable resource when someone will pay to do so is an unsupportable waste of taxpayer dollars that yields no conservation benefit.

The current proposal will not only result in lost revenue in the short and long term, but it will also result in inferior tahr trophies being taken and higher costs to find quality males. Reductions in numbers and quality of trophies will create client dissatisfaction and the loss of New Zealand's reputation as a desirable, quality, hunting destination. This is important to other sectors of the hunting industry because tahr are a unique drawcard attracting hunters to New Zealand. Those hunters have opportunities in many other destinations to hunt our other game, such as red deer. New Zealand is the only country outside of the Himalayas where it is possible to hunt tahr in a free-range mountain environment and this is a strong influence on international hunters' decisions to come to New Zealand.

The proposal will undermine recreational hunting interest and cooperation

The HTCP recognises that for sustainable, cost effective tahr control it is important to retain hunter activity. The rapid and substantial decrease in the tahr population in the proposed plan would substantially undermine future hunting sector tahr harvests. Importantly, the proposed reduction in the bull population would reduce recreational hunting activity, including nanny tahr kills, as well as AATH, along with its required nanny offsets. These outcomes will impose more costs on the Department in the future.

Sustainable Commercial Meat Harvesting

A sustainable harvest of tahr for meat requires continuity of supply to ensure market access. A one-off harvest of 3,000 tahr will not accomplish this. The proposal demands that WARO operators effectively kill off the business they have worked hard to establish. It also fails to understand that commercial meat recovery of tahr has finished for the year because of lack of processing capability. There are, however, opportunities for 2019 and beyond.

The proposal places an unequal and unfair burden on the hunting sector.

It is now 25 years since enactment of the HTCP, and tahr populations have grown steadily over that time. DoC's failure to meet the requirements of the HTCP has resulted in a proposal to pass the subsequent costs onto the hunting sector. The hunting sector considers that is unfair. The HTCP made provision for the Department to consult and engage constructively with the hunting sector to manage tahr. It also required DoC to reduce the

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tahr herd to 10,000 animals if the hunting sector did not do so. DoC did not do these things. Expecting the hunting sector to meet the costs of correcting DoC's failure is unjust.

Further, DoC proposes to undertake control in all management units before providing the hunting sector an opportunity to contribute. This means that the hunting sector is expected to take 7,500 animals from an already depleted population. This is economically and logistically unfair. It takes months to mobilise and organise recreational hunters for any such initiative. There is little to be gained from putting recreational hunters into areas that have already been culled by either DoC, WARO or AATH. Problematically, recreational hunters will have little interest in doing follow-up culls after aerial culls. Commercial operators' costs will be increased under this strategy.

The proposal will increase conflict

The Game Animal Council and hunting groups have gone to considerable effort to minimise conflicts between recreational hunters, hunting guides and commercial hunters. This proposal will be a major setback in that effort.

To avoid duplication and waste of effort, as well as disruption of experiences, hunters require prior notification of where culling by others will take place.

Helicopters culling tahr in the same area where recreational or commercial hunters are present presents a danger to both. The AATH code of practice addresses this issue, which must be incorporated in the DoC standard operating procedure for culling tahr.

Lack of coordination

The proposal does not include any measures to coordinate efforts of the various groups to improve efficiency and reduce cost. For example, WARO operators have a market window for their product which has now finished until well into 2019. Recreational hunter organised hunts have a long lead time. There is a well-defined guided hunting season, and constraints on guides' participation because of the range of activities required to run their businesses successfully, including overseas travel and guiding on other species in temporal windows defined by nature.

It is also noted that the Department has very limited data on recreational hunter success, primarily due to the inability of recreational hunters to record their success and other observations. This was previously available, but under the new permit system is no longer possible.

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Summary

Many of the issues identified above were identified, and acknowledged by DoC, at the recent Tahr Liaison Group meeting. No reasons have been provided for failure to address them in the proposal. This is problematic for maintaining a continued, constructive partnership with the hunting sector.

We recommend the following changes to the proposal:

Draft Control Plan outline for reducing Tahr numbers

Key Principles

Partnership

The control plan should be a partnership between The Minister of Conservation as governing Minister, DoC and the Game Animal Council as statutory bodies, Ngai Tahu as treaty partner and all stakeholders with an interest in Tahr.

Science led

As far as possible, science should inform decisions. Important aspects include monitoring of tahr harvests by each sector, monitoring of vegetation and tahr numbers, modelling tahr population responses to hunting and to environmental changes, measuring the effects of tahr on native vegetation, and identification of social objectives. Tahr control operations will be prioritised by science-informed conservation priority at place. Control must be focused on outcomes, not outputs. Control programmes that target specific numbers of dead tahr will not maximise conservation benefits.

Transparency

All information shall be made available to stakeholders and the public. It is important that hunters and others are notified well in advance of any required population control operation and have adequate opportunity to identify adverse effects and their potential mitigation.

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Precautionary and adaptive approach

Uncertainty is endemic in wildlife management. Adaptive management helps address uncertainty. It requires flexibility through monitoring progress towards goals, and willingness and ability to change plans as more information becomes available, rather than specification of inputs or outputs as management objectives.

Minimise waste

Where practical, priority should be given to population control operations that utilise the carcasses (eg WARO).

Implementation

Tahr Management Team

The Tahr Management Team will develop and oversee implementation of the Tahr Population Management Plan as approved by the Tahr Liaison Group. This team will consist of one representative from DoC, one from the Game Animal Council, one from Ngai Tahu and one from TLG stakeholders. They will be responsible for the program oversight, audit/verification, and management decisions during the annual cycle. The Tahr Management Team will ensure all relevant scientific and management information is available to stakeholders and the public. DoC will fund the Tahr Management Team's expenses.

Tahr Population Management Plan (TPMP)

The TPMP will be developed by the Tahr Management Team and approved by the Tahr Liaison Group at its annual meeting. The objective of that plan is:

To manage the Himalayan tahr herd to ensure indigenous flora is in an acceptable state and that reasonable hunting opportunities remain for all hunters.

This objective would be consistent with a moderate population of tahr with restricted reproductive capacity and a high proportion of males over 4 years of age.

A Staged Programme

The high level of uncertainty about tahr numbers and the location of adverse effects of localised high tahr populations supports an adaptive process that refines information on

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these matters through the programme and further research. Previous culling regimes have been biased towards females and juveniles with half of the juveniles culled being males, whereas hunting has been very much focused on trophy males. The current age and sex structure of the population is unknown, but is an extremely important component of the tahr population response to any proposed harvest strategy.

Biological models suggest that reducing the tahr population in stages will not pose an undue risk of catastrophic effects to vegetation in the near future (population hotspots may require individual control), nor will it risk a tahr population blow out.

A staged approach will allow commercial hunting markets and recreational hunting to adapt to a lower supply.

We suggest the reduction takes place over three seasons because this will address environmental and hunting objectives whilst adhering to the precautionary principle.

No culling of male tahr of any age

Bulls have zero reproductive capacity. Killing nannies in preference to bulls, whether juvenile or mature, maximises environmental benefits and is more effective for population management. It biases the herd structure towards bulls, which the hunting sector has incentive to harvest, reducing DoC costs and producing commercial benefits. Recognition of juvenile bulls can be difficult and juvenile mortality of both sexes is high. Consequently, mature nannies have much higher lifetime reproductive capacity than juveniles. Because culling nannies yields the highest conservation benefits coupled with the difficulty of identifying juvenile males, juveniles should not be killed.

The guided hunting sector has invested heavily in marketing and establishing infrastructure for future hunts and has contractual commitments to clients for the next 2 or 3 years. Recreational hunters have already invested in planning trophy tahr hunts. These sectors need time to adapt to a lower population of bull tahr. Commercial and recreational hunters will kill approximately 2,000 bulls during the 2019 season, with a significant proportion of those coming from public conservation land.

Notwithstanding the foregoing, the hunting sector acknowledges the adverse effects of expansion of tahr range and supports culling male tahr outside the feral range and in exclusion zones.

Over time, bias the population towards a larger percentage of male tahr.

Related to the previous point, to mitigate the effects of a lower tahr population on recreational hunting, guided hunting and AATH it is desirable to increase the proportion of

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males in the population. Each of these activities makes a significant contribution to nanny harvests, which will be lost if the incentives provided by the presence of trophy bulls disappears.

Animal Welfare

Even though population control is required, the Animal Welfare Act acknowledges that tahr are living, sentient creatures requiring respect, empathy and the most humane death possible. Quick clean and confirmed kills will be required. There should be no culling from mid-November until the end of March to avoid orphaning dependent kids (this can be adjusted seasonally and geographically depending on when kids start to be born or are independent of their mothers).

Trophy quality

No culling in the period from mid-November until the end of March will reduce growth impediments that would arise from orphaning young males at an early age. First year horn growth is essential for future trophy quality.

Increase knowledge in order to make better decisions

It is vital to gather essential information about tahr herd structure and status during control and hunting, whether by DoC, WARO, AATH, guided hunting, or recreational hunting. Animals seen and killed, their age, sex, location and reproductive status and catch per unit effort are all important indicators of herd status and management effectiveness and costs. Vegetation plots should be measured every 5 years to provide timely indicators of vegetative trends and to identify locations in need of tahr control.

2018/2019 Population Control Programme

- Objective:** Halt population increase and reduce the current breeding population.
Method: a coordinated cull of up to 8,000 breeding females (2 years and older) in two tranches throughout the tahr range. The first tranche, taken by DoC, will be 6,000 prior to mid-November 2018. Recreational hunters, WARO and AATH will take the second tranche in April and July-September 2019. WARO requirements can be supplemented from harvests from pastoral lease and private land requiring control, with the agreement of the landowner. Population models indicate that with a population of 40,000 tahr an annual harvest of mixed age and sex of 5,000 to 6,000 tahr will prevent population increase. A larger harvest of only breeding females will both reduce the overall population and significantly reduce recruitment, particularly

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since there has already been a cull of 2670 tahr from Mt Cook National Park and surrounding PCL.

2. **Objective:** Remove tahr population hotspots.

Method: The numbers taken from each management unit should be proportional to the population estimates for that unit whilst taking account of the precautionary principle. During the first round of culls identify and target particular areas that have high tahr populations.

3. **Objective:** Meet minimal animal welfare standards.

Method: If practical, this cull should be undertaken prior to kid drop 2018. If this is not practical then it should recommence for the month of April once kids are independent from their mothers.

4. **Objective:** Minimal interference with guided and recreational hunting.

Method: No Culling during the rut. Culling to take place during September to Mid-November, and April if required.

5. **Objective:** Coordinate operations and recognise opportunities and constraints for hunting sector groups.

Method: The initial method will be DoC culling, undertaken in areas at high risk and/or unsuitable for other types of control, and/or in areas that present access difficulties for the hunting sector. Hunting sector control activity will be timed to capitalise on market opportunities and to recognise constraints on participation. Constraints to consider include: Weather, snow and access conditions for recreational hunters constrain their effective participation to late spring to early winter. WARO participation is limited to times when carcass processing is available. AATH offsets have largely been carried out for the previous season. It is not practical to effectively utilise professional hunting guides or recreational hunters in the time frame proposed by DoC. All operations will need to be coordinated going forward to maximise efficiency.

6. **Objective:** Ensure transparency, coordination and integrity of aerial culling operations.

Method: Helicopter operators, and shooters shall be accredited by the TMT. Allocation of work must be open and transparent. Observers to be used as appropriate.

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7. **Objective:** Ensure tahr harvest is not wasted and mitigate financial costs for hunting sector participants.
Method: DoC to prioritise its control effort in more difficult parts of the management units that are not viable for WARO, or suitable for recreational and hunting guides to control.
8. **Objective:** Maximise the effectiveness of ground hunters.
Method: Identify areas where ground hunting by recreational hunters and hunting guides can be the most effective, and allocate those areas for them to control. Remove barriers to access and Use AATH as back up (see 9 below). Increase the harvest of females by self-motivated recreational hunting. Develop methodology for quantifying the self-motivated recreational hunter harvest and integrate this harvest into population modelling.
9. **Objective:** Maximise the effectiveness of ground hunters, but recognise there are areas where they cannot be fully effective.
Method: AATH will back up recreational hunters, hunting guides and WARO to target areas identified as still needing attention. This can be done after the tahr rut and guiding season.
10. **Objective:** Enhance stakeholder engagement to prevent duplication of effort, which will increase costs. Avoid missing areas where control is required.
Method: The Tahr Management Team will allocate control areas (both spatially and temporally) and the number of tahr to be culled in each.
11. **Objective:** Apply adaptive management.
Method: Review the results at the end of April 2019, remodel the population taking into account new information, inform AATH and WARO of any areas needing additional control, and plan new control operations for 2019/2020. Report to the Tahr Liaison Group at the end of August each year.
12. Repeat in April 2020.
13. Tahr that should not be killed:
 - a. Any tahr within a 1 km buffer zone of the ZIP study area in the Perth.
 - b. Any tahr wearing a tracking collar. If a collared tahr is killed accidentally, the collar should be retrieved and returned to the Game Animal Council.
 - c. White tahr.

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Planning and Operational Cycle

End of August:

The Tahr Liaison Group meets to discuss results of the previous year and to consider approval of a plan developed by the Tahr Management Team for the coming year. TLG amends and approves the plan.

September- Mid November:

DoC, Recreational and Guided Hunting operational Window 1. DoC Search and Destroy (SAD) and organised recreational hunter hunts. The recreational hunting sector will target harvest of females at this time. Females are easier to target in the spring and will be pregnant.

April:

DoC, Recreational and Guided Hunting operational Window 2. DoC SAD and organised hunter hunts

July-September:

WARO harvest window and AATH back up for any areas that recreational hunters and WARO have been unable to control, and for identified hot spots. This window can be used to remedy forgone control in operational windows 1 and 2 arising from, for example, cancellation of culls or inability to undertake WARO due of weather, market downturns etc.

Develop required cull estimates for 2019/2020.

By mid-November 2018: DoC SAD to cull 6,000 females in Management Units 1-7, plus as many tahr as possible in the exclusion zones and outside the feral range.

April 2019: DoC cull any remaining females from the 6,000 above that were unable to be culled in the period until mid-November 2018

February-July 2019: 2,000 bull tahr harvested by recreational hunters, commercial hunting guides, and AATH (some on private land).

April 2019 and July-September 2019: Up to 2,000 tahr culled by WARO, AATH and recreational hunters. Obtain WARO market requirements as early as possible.

The total is 10,000-13,000 tahr culled, which is approximately one third of the mid-point of the estimated population range (recalling that 2,670 tahr have already been taken from Mt Cook NP and surrounds).

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