



New Zealand Deerstalkers' Association Inc

Protecting Hunters' Rights in New Zealand Since 1937

NELSON BRANCH

David Haynes
Committee Executive
Nelson Branch
NZ Deerstalkers Association\
c/o 158 Kanuka Rise
Wakapuka RD1
Nelson 7071

5 February 2019

WARO 2018-19 SECOND ROUND CONSULTATION

Introduction

Nelson Branch NZDA is pleased to provide our second submission to the WARO review process. This submission has been prepared in consultation with our Committee whom represent the four hundred members of our Branch.

We have liaised with Jo Gould, Statutory Manager, Northern South Island, and would like to acknowledge her assistance with the process.

Comments on the Consultation Process

We feel that the consultation process appears even more like a box ticking exercise than a genuine attempt to seek input and knowledge from the highly respected NZDA. The first round consultation was frustrating, with changing deadlines and poor quality maps which lacked any detail to enable their scrutiny.

Similarly, this second round of consultation is disheartening. Our first round recommendations have been ignored, the justification appears not to acknowledge that hunting on public conservation land is an important and popular recreational and professional (guiding) activity and has been for over one hundred years. The current WARO concession process is antithetical to this.

The DOC national panel appears obscure, unaccountable to stakeholders (recreational hunters) and its decisions are highly subjective. The feedback instructions and presentation of the information are labyrinthine - the maps provided are poor quality to the extent where we cannot even work out where proposed WARO boundaries are and the ever changing deadlines serve only to further confuse.

Wider Strategic Concerns

Recreational hunting is an integral part of our New Zealand heritage, has stood the test of time and is an increasingly popular sport. It confers physical, mental and social benefits, provides high quality, free range organic meat for the table and teaches those who hunt the value of our public conservation estate and access thereto, safety, self-reliance, tenacity and skill. There is a substantial business wrapped around hunting, including guides, helicopters and outfitters.

As per the 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.” Thus hunting is an explicit component of conservation (recreational enjoyment by the public).

NZDA and the Game Animal Council have persistently called for a more inclusive and strategic approach to game animal management from DOC and have consistently been ignored. The oft stated mantra that WARO is more efficient at removing deer than recreational hunters is bereft of any supporting data – it is a fallacy borne from a minority of commercial interests and those who are anti-introduced game animals.

WARO is a boom and bust industry, driven solely by profit and thus has a limited benefit in the wider management of game animals and sustainable conservation outcomes. Recreational hunters, on the other hand, hunt consistently (and have done for over one hundred years), regardless of venison price, cover far more conservation land and will shoot goats, pigs, tahr and chamois as well as deer, further contributing to conservation values.



Average NZ prices for stags - pricing volatility determines WARO activity

The WARO concession process, in its current form, is anathema to recreational hunters – it disincentivises them to hunt any area where WARO is knowingly carried out as it diminishes both the hunting experience and chance of shooting an animal. This negative impact can last for many years after WARO has ceased operating in an area. The current WARO concession process enforces a *stark choice* for DOC – a short, intense period of WARO, or, a longer-term sustainable recreational hunting input.

more WARO = less recreational effort.

Recreational hunters have been promised a comprehensive review of the WARO concession process repeatedly and DOC promised to do so in the High Court (2 May 2017) in the case taken against DOC by the Lower North Island Red Deer Foundation. And yet here we are, once again, being promised the same review in five years' time. Recreational hunters are being side-lined by DOC and the efforts of NZDA to work constructively with local DOC offices are being corroded.

The Game Animal Council is now operational and supersedes the DOC Deer Control Policy of 2001. We believe it is now time for DOC to work with recreational hunters, GAC and WARO for a more balanced and equitable regime of game animal management for the long-term. We recommend moving from the current “stark choice” concession process to a WARO regime that is complementary and not antithetical, to recreational hunting.

We submit the following recommendations to this end:

Recommendation	Rationale
No recovery of trophy stags	More valuable to recreational hunters than WARO operators and hence recreational effort is sustained.
One WARO operator per area	Enables operators to bid competitively for areas, eliminates competition urgency, flattens harvest period, efficiency gains for WARO, enables better compliance monitoring.
No WARO in foot accessible areas	Equitable allocation of access.
No WARO in high recreational use areas, wilderness areas, Te Awaroa, RHA's and areas of high interest to recreational hunters (e.g. Nelson Lakes National Park)	Safety of trampers, anglers, hunters, climbers, etc and encouraging long-term sustainable hunting by recreational hunters.
No WARO during 23 March – 15 April	High recreational hunting activity during the roar
WARO excluded from areas where aerial 1080 with deer repellent has been used	Publicly funded deer repellent operations should be for the benefit of public, not private, hunters.
WARO permits to be issued for a maximum 3 years only.	Enables frequent review of process.

Comments on Specific Areas of Interest to Nelson Branch

Nelson Lakes National Park

This is an area of very high recreational use. We support the restriction of WARO but suggest it be further limited between 1 June and 30 September as, weather permitting, October is a popular month for hunters.

Cobb/Mt Arthur/Tablelands

We note this area is excluded from the list of proposed WARO areas but maintain that the area defined under the old Recreational Hunting Area (prior to its absorption into the Kahurangi National Park) should be not permitted for WARO for the following reasons:

1. It satisfies the General Policy for National Parks 4.3(j) “recreational hunting of wild animals and pests should be encouraged where this does not diminish the effectiveness of operations to control them and is consistent with planned outcomes at places.”
2. Historically, the area was a recreational hunting area prior to establishing Kahurangi National Park which acknowledged its importance to the local hunting community – it is one of very few areas in Golden Bay for hunting on public land and is also popular with hunters from Nelson and Motueka.
3. Irrespective of WARO disinterest in fallow deer, permitting an area for WARO absolutely discourages recreational hunting as it diminishes both opportunity and experience. Thus non-WARO areas are highly attractive to recreational hunters.

4. The fallow herd in this area is unique – it is a boutique herd, the first fallow herd release in NZ and is isolated and small thus will not be replenished if the herd is reduced beyond its natural reproductive capacity.
5. Not permitting WARO and hence preserving this small but valued fallow herd is consistent with the proposed use of deer repellent for the planned aerial 1080 drop over this area later in 2019.
6. It is an area well serviced with vehicle access, tracks and huts enhancing hunter accessibility.

Mt Richmond Forest Park -Beeby's to Gordon's Knob

These areas and the inter-connecting ridge are readily accessible by recreational hunters and are close to Nelson and environs, hence a very popular hunting, tramping and mountain biking area throughout the year. Over and beyond safety reasons, not permitting WARO maximises recreational hunting effort. Conservation values are medium to low as it has been modified historically (forestry, tracks and clearances). NZDA are proposing this area to be designated an RHA in the future and to be treated as one for management purposes currently.

Branch/Leatham Conservation Area

This is close to Nelson and Blenheim and their environs and is very popular with hunters. It is well served with huts, tracks four wheel roads and a local helicopter operator (Tasman Helicopters). Most of the valley floor and sides have low conservation values – much of it used historically for exotic planting trials by the Forestry Service. Again, WARO activity explicitly diminishes recreational hunting activity. NZDA propose this area should be a future RHA and treated as one currently. Recreational hunters can work collaboratively with DOC in managing chamois and deer herds and so preserve conservation values on the tops.

There is also a joint NZDA/DOC opportunity arising from assigning this area and RHA – policing unlawful night shooting and spotlighting which is rife in the lower valleys.

END OF SUBMISSION