

JULY 15, 2020

Dear Prime Minister Ardern,

Safari Club International (SCI) writes to express our grave concern with the Department of Conservation's (DOC) 2020-2021 operational plan for controlling New Zealand's tahr population. SCI objects to this plan for four reasons. First, unlike in years past, the DOC failed to consult with stakeholders regarding the plan until ordered to do so by a court. Second, the considerable increase in search and control and the targeting of bulls is scientifically unsupported. Third, the plan will essentially eradicate the world's most robust tahr population, contributing significantly to this species' potential extinction risk. Finally and critically, the plan will have a devastating impact on rural economies, livelihoods, and the hunting industry.

First, while SCI appreciates the court-ordered consultation, it is quite troubling that the plan's initial development included very little input or consultation from the New Zealand Tahr Foundation (NZTF), the hunting industry, or other stakeholders with a vested interest in tahr management. Appropriate consultation previously occurred; however, the DOC's present lack of consultation until ordered by a court threatens to effectively undo the trust and understanding that these stakeholders and the DOC developed over the years. SCI respectfully requests that the DOC remedy this breach by duly incorporating the concerns of these stakeholders (including those discussed in this letter) in a revised operational plan.

Second, this year's plan relies on outdated population estimates. Without any scientific basis, it will devastate the tahr populations for many years to come. The plan calls for the removal of more than 4,000 nannies and juveniles outside of National Parks while simultaneously culling over 3,000 animals inside parks, over half of which are expected to be bulls. This increase in control, and the lethal control of bulls, fails to account for past culling and is not based on updated population or sex-class estimates. SCI believes it is irresponsible to greatly increase search and control time without updated data to ensure tahr are not completely removed from the National Parks.

Third, the National Parks are the heart of the tahr's range in New Zealand. Thus, carrying out this plan would drive tahr populations to at or near zero density, potentially putting the long-term sustainability of the species in peril. New Zealand is home to the largest population of tahr remaining in the world. Wild tahr populations in their native range are small and believed to be declining. If these animals are eradicated from your country, the global population of this species will be pushed to the brink of

extinction. Though not technically a native species in New Zealand, the future existence of these magnificent creatures in the wild may very well depend on New Zealand's ability to manage its population sustainably. Undertaking the plan without sufficient understanding of current population structures is not sustainable. It contributes to the potential global extinction of tahr.

Last, the culling of bulls will have a devastating impact on tahr hunting opportunities, which is of great concern to the hunting community worldwide. New Zealand is home to the only huntable herd of tahr outside of the Himalayas, making them a very marketable resource of global importance. A trophy tahr hunt can cost between 25 to 30 thousand US dollars each, which means that expanded hunting opportunities could be viable for managing their numbers and generating much needed economic activity. 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.

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.

SCI acknowledges that tahr numbers need to be kept in check. For decades the hunting community has played a role in doing so. All stakeholders must accept that soundly protecting New Zealand's ecological balance should be a priority, as the entirety of the hunting industry relies on a healthy ecosystem. For this reason, the hunting community strongly supports science-based management to determine how many tahr New Zealand's mountains can hold in balance with ecological priorities and hunting opportunities. SCI supports the DOC's efforts to manage tahr, but with an emphasis that the species is managed, not eradicated. A revised management plan should be driven by the best available science with the support and participation of the hunting community.

Sincerely,

Scott Chapman

President

Safari Club International

Jun chymn