

Future Management of the Horowhenua, Manawatu, Rangitikei, and Wanganui Sambar Deer Herd

Submission from: **NZ Forest Owners Association**
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To: **Department of Conservation**
Wanganui Conservancy Office,
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Wanganui
By email to sambar@doc.govt.nz.

Are you a landowner/land manager within the gazetted area for hunting Sambar deer?

Yes
No

The NZ Forest Owners Association (NZFOA) is a national organisation of 280 members, representing 1.4 million hectares (75% of the national plantation estate), including 160,000 hectares in the southern North Island. New Zealand forestry directly employs 23,000 people, accounts for 4% of GDP, has annual sales of more than \$5 billion and with exports of \$3.5 billion a year is the country's third largest export earner.

Two NZFOA members have large forest estates in the Rangitikei area (i.e. within the gazetted recreational hunting area for sambar deer):

- Ernslaw One Ltd has c. 12,500 hectares of land in the Rangitikei area of which c. 9,950 ha are stocked in mainly *Pinus radiata* (including Santoft, Harakeke, and Tangimoana Forests). There are currently 18 'public' hunting blocks on Ernslaw One land (including Santoft [11 blocks], Tangimoana [4], Harakeke [3]).
- Matariki Forests directly owns and/or manages c. 7900 ha of land within the gazetted recreational hunting area. This area was transferred from Rayonier NZ Ltd to the new forest owner on October 1 2005. Sambar deer are present in the Waitarere, Cvitanovich, and Okirae blocks which account for c. 3000 ha of this forest estate. Currently the Sambar Deer Management Foundation (SDMF) organise the public ballot for Waitarere Forest (2000 ha) while Matariki Forests' manager, Rayonier New Zealand Ltd manages the ballot for the remaining 1000 ha. There are currently 6 'public' hunting blocks in Waitarere forest, and 3 blocks in private ballots.

NZFOA member forests comprise approximately three quarters of the total hunting blocks available to the Sambar Deer Management Foundation for the public ballot. NZFOA members have major concerns about the legal restrictions which prevent them from controlling a pest species on their land, and wish to see these addressed urgently.

The NZFOA welcomes the consultation process which we believe is long overdue. For several years, member companies have been urging that the hunting moratorium be lifted, to enable them to effectively manage sambar deer in their plantations. In effect, the moratorium requires them to maintain a recreational hunting herd on their properties for the public benefit.

Now the moratorium is under review it is crucial that the process is expedited. A continuing inability to control sambar deer populations is resulting in irreversible losses to NZFOA members of several thousand dollars a day.

Approximately 12% of the land holdings of NZFOA members is in indigenous forest, making plantation forest owners the second largest managers of indigenous forest in New Zealand. This responsibility is taken seriously and is reflected in the association's status as a prime mover of the NZ Forest Accord and in the provisions of the National Standard of Plantation Forest Management. The recent development of a web-based tool for the management of rare and endangered species in plantation forests, made possible by a grant from the NZ Biodiversity Advice Fund, is further evidence of the importance NZFOA members place on their role as stewards of indigenous biodiversity.

Because of our many shared interests, it is important to the NZFOA that we maintain a professional and effective working relationship with the Department of Conservation, based on mutual respect and recognition of the legitimate concerns of the other party.

1. What are your views on the continued management of sambar deer in the Horowhenua, Manawatu, Rangitikei, and Wanganui areas?

NZFOA wishes to see the restricted sambar deer hunting management regime (as provided for in the 1988 and 1990 gazette notices pertaining to sambar deer hunting) on its members' estate removed and replaced with unrestricted hunting. NZFOA's concerns primarily relate to the significant economic damage that sambar deer have caused and are continuing to cause to production forest stands planted since 1990 (see appended photographs, and Section 2 below). In view of this damage, the current management regime is both inappropriate and unacceptable to the NZFOA and its members.

Removal of the current restricted hunting regime would allow for the taking of greater numbers of deer by recreational hunters and/or enable NZFOA members to undertake necessary control operations to protect and enhance the economic viability of their forestry holdings in the Rangitikei sand dune country.

It should be noted that the current management regime for sambar deer in the region was introduced in order to preserve the herd at a time when considerable numbers of animals were being taken by commercial hunters for a feral venison market which no longer exists. Remaining herd numbers were low, and damage levels were almost certainly of limited economic significance. The current management regime has led to a considerable increase in sambar deer numbers and increasing economic damage to production forests (and other crops) (Dr K.W. Fraser, wild animal ecologist, Landcare Research, *pers. comm.*).

DoC's management regime for sambar deer in the Manawatu-Wanganui region (i.e. restricted hunting which is, in effect, a partial protection) is unique in New Zealand for a pest species. As such it is inconsistent with the Wild Animal Control Act 1977, the Conservation Act 1987, and DoC's own policy which gives recreational and commercial hunters generally unrestricted access to hunt introduced wild animals (pests) on public conservation (and other) lands.

With the exception of the Wapiti area (a special circumstance) and a few other areas such as the Blue Mountains RHA (where recreational hunting is year-round but hunter numbers per block are restricted for safety reasons), hunting of deer species in New Zealand is effectively unrestricted. This is consistent with the statutory status of deer (and other 'game' species) that are listed as noxious animals (i.e. pests) in the Wildlife Act 1953 (Schedule 6).

DoC's policy statement on deer states that the Department will take a targeted control approach designed to achieve the protection of indigenous plants and ecosystems. Clearly, this statement relates primarily to the conservation estate. The policy statement also declares that this approach will not affect the management of deer on private or Maori land and that regional and national pest management strategies will continue to be the main mechanism for controlling deer on private land. One circumstance when DoC would consider undertaking control on private land, however, is to restrict the spread of feral deer herd.

The present status of sambar deer in the Manawatu-Wanganui region (and the restricted hunting management regime) is inconsistent with the Department's deer policy. That policy specifically declares (in terms of its priority outcomes for deer control) that the Department will encourage Regional Councils to include deer in their Regional Pest Management Strategies. The policy also seeks to prevent the expansion of the feral range of pest species, which appears to be occurring with sambar deer, due at least in part to the current management regime.

Based on DoC's deer policy and existing legislation, the NZFOA believes sambar deer should be included within the Manawatu-Wanganui Regional Council's Regional Pest Management Strategy as a pest of local importance.

DoC's deer policy commits the Department to the use of an adaptive management approach to deer control on the conservation estate. Such an approach would have been appropriate for the control of sambar on private land in the Manawatu-Wanganui area, because the goals and outcomes are easily defined and measurable.

Data highlighting that a significant economic problem exists in some areas as a result of excessive sambar deer numbers has been readily available for several years. An adaptive management approach would have dictated that greater numbers of sambar needed to be removed annually and that the management regime should have been adjusted accordingly (such as by extending season, increase bag limit, require that hinds be taken, remove restrictions entirely). It is of great concern to the NZFOA that such an approach has not been applied.

Wild Animal Control (WAC) Act 1977

Although the Wild Animal Control (WAC) Act relates primarily to the conservation estate and other Crown lands, there are provisions and specifications in the Act that relate to the management of deer (and other introduced species) on private land. In Part III (Recreational Hunting) of the Act, the conditions for establishing and managing recreational hunting areas (RHAs) are specified. Specifically, the Minister cannot include private land within a recreational hunting area “*unless he has first sought the views of, and received written approval to such use of the land from ... [the owner]*”. Therefore, given that the area currently ‘managed’ by the SDMF (on behalf of DoC) effectively operates as an RHA, private forestry companies and other land owners could (retrospectively) ask whether this condition was met when (a) DoC devolved management of the sambar herd to the SDMF and (b) the restricted hunting management regime was initiated.

That the sambar deer range within the Manawatu-Wanganui region is effectively considered and managed as a recreational hunting area is confirmed by the terminology used in the 1988 and 1990 gazette notices and the public consultation document prepared for this process, all of which explicitly refer to the “*specified area for the recreational hunting of sambar deer*” and/or the “*gazetted recreational hunting area for sambar deer*”.

Given the present level of economic damage being sustained by private land owners, it may be possible under the WAC Act for private forestry companies and other land owners to revoke/withdraw their agreement for the area to be managed as an RHA (if it were ever obtained in the first place).

Furthermore, the Act requires RHAs to be managed under a wild animal control plan, which must be updated at no greater than 5-yearly intervals. Given that the Manawatu-Wanganui sambar deer herd is essentially being managed as an RHA, the absence of a wild animal control plan is of concern.

Part III of the WAC Act goes on to state that “*where studies and investigations have shown that the presence of wild animals is detrimental to the maintenance of the land and the vegetation ...*”, then the Minister may (a) allow commercial hunters access, (b) undertake control measures, (c) allow intensive recreational hunting.

Given these provisions in the Act and the clearly established damage, an extension of the current restricted hunting regime cannot be supported.

Threat to Conservation Values

While sambar deer damage to conservation areas within the Manawatu-Wanganui region has not been specifically assessed, numerous studies in New Zealand have clearly documented the threat deer pose to conservation values (e.g. Nugent et al. 1997, 2001). Therefore if sambar deer numbers are maintained, or further increase, it is inevitable that significant damage to representative and locally significant conservation values will occur. Regional committees of New Zealand’s largest conservation group report damage to indigenous vegetation on its private reserve lands (G Keey, Forest and Bird, pers comm.).

Pests of Regional Importance

Although not specifically listed as Pests of Regional Importance, the Manawatu-Wanganui RPMS (a statutory requirement under the Biosecurity Act 1993) lists deer (including sambar) as ‘non-statutory problem animals’. As such, the RPMS provides that “*Horizons.MW will conduct control operations on deer populations in high value conservation areas, on soil conservation plantings, and in other exceptional circumstances*”.

Given the nature and level of the current economic problem posed to private production forests (and other crops) by sambar deer, NZFOA believes that a compelling case exists for the immediate control of sambar deer numbers in certain areas (i.e. the present level of economic damage constitutes an ‘exceptional circumstance’). However, such a course of action is precluded by the 1988 and 1990 gazette notices, despite the fact that the RPMS states that Horizons.MW “*advocates deer control by land occupiers*”.

Again, the NZFOA wishes to emphasise the fact that the situation as it relates to sambar deer in this area is unique and inconsistent with accepted policy and practice. In the case of other pest species (and weeds), the land owner would be entitled (if not obligated under the RPMS) to undertake whatever control measures were deemed necessary to mitigate the negative impacts of these species. In terms of the RPMS, the SDMF (and, by default, DoC) effectively acts as an exacerbator (i.e. “*by their activities or inaction, they contribute to the creation, continuance, or exacerbation of a particular pest management problem*”). Furthermore, NZFOA members (and other land owners) are effectively unwilling exacerbators in terms of the sambar deer problem given their inability to undertake the necessary control measures in light of the current hunting restrictions.

Sambar deer represent a threat as a potential reservoir and vector of bovine Tb. This is particularly relevant given the propensity of sambar deer to utilise farmland (more so than red deer). The main threat is from sambar deer re-infecting possum populations from which the disease has been eradicated. Given the distances some sambar deer move (up to 16 km; Nugent 1993), there is clearly potential for significant disease dispersal/spread. The NZFOA shares the concerns of Ernslaw One and Matariki that, given the numbers of sambar deer present on their lands, they represent a potentially serious threat to neighbouring farmers (in terms of possible Tb spread) and this is inconsistent with their desire to be ‘good neighbours’. Effectively, the NZFOA member companies’ ability to address this situation is precluded by the current management regime.

Herd Management

There are a range of proven and acceptable options that land owners could employ to mitigate the negative effects of sambar deer on their land, including unrestricted or enhanced recreational hunting, aerial hunting, team-swath hunting (as successfully employed elsewhere for feral goats), dogging and spotlighting.

Of these, the potential for unrestricted or enhanced recreational hunting is significant. Currently, only 10% of hunters are successful in the public ballot and therefore it is

not unreasonable to expect that if restrictions were removed, the level of recreational hunting activity would increase dramatically (with an obvious impact on sambar deer numbers). While such a scheme would not lead to any increased expense for the Crown, it would have an impact on forestry companies and other land owners as demand for access to areas with sambar deer increased. The NZFOA submits that forest owners must have the option of charging a realistic land access fee (hunting permit) to compensate for the real administrative costs of allocating hunting blocks. Further, NZFOA members and other land owner must retain the right to allocate hunting blocks only to persons with whom they have a working relationship via a formal permit system.

NZFOA believes that any concerns that sambar deer will be threatened as a viable hunting population are unfounded. Sambar deer are well established and spread in the Horowhenua, Manawatu, Rangitikei, and Wanganui areas. There are sufficient private landowners who support the presence of sambar deer to ensure there are some areas of moderate to high deer numbers that would provide recreational hunting opportunities. Furthermore, sambar deer are continuing to expand their range (albeit slowly) as a result of natural dispersal and as a result of illegal releases (Fraser 2004). Thus there are likely to be increased hunting opportunities in areas where sambar deer are not damaging private production forests and farm crops.

Bark-stripping damage to pine trees by sambar deer was reported as early as 1965, but it does not appear to have been a significant economic problem prior to 1988. Sambar deer were relatively heavily hunted and numbers were much lower than they are now.

The present restricted hunting management regime appears to have led to a significant increase in the sambar deer herd. One key factor in this increase is the current bag limit of one animal per hunter within each hunting season and the propensity of many recreational hunters to selectively hunt stags. Analysis of hunting returns for the period 1996–2004 shows a significant bias towards stags (61% of the total reported kills). This is also reflected in the sighting data from the same period (72% of sambar deer sightings were hinds) confirming a female-biased sex ratio. The effect of such a bias is that deer numbers will increase at a significantly greater rate than if the harvest sex ratio was at parity (i.e. 50:50).

The current hunting model set by gazetted regulation and administered by the SDF is inefficient, and frustrates both the land owner and the recreational hunter. Hunting success would be significantly improved if individual recreational hunters were given access on multiple successive weekends, and encouraged to bag more than a single animal.

A mutually beneficial arrangement such as this would not require the involvement of the Department of Conservation, nor a continuation of existing regulations.

References:

- Fraser, K.W.; Ferriss, S.J. 2004. Wild deer in New Zealand: 2004 revision of species ranges. Landcare Research Contract Report LC0405/017 for the Department of Conservation (unpubl.). 53 p.
- Nugent, G. 1993. Deer movement patterns in New Zealand and their implications for the spread of bovine tuberculosis. Landcare Research Contract Report LC9293/119 for the Animal Health Board (unpubl.). 25 p

Nugent, G.; Fraser, K.W.; Sweetapple, P.J. 1997. Comparison of red deer and possum diets and impacts in podocarp-hardwood forest, Waihaha catchment, Pureora Conservation Park. *Science for Conservation* 50. 61 p.

Nugent, G.; Fraser, K.W.; Sweetapple, P.J. 2001. Top down or bottom up? Comparing the impacts of introduced arboreal possums and 'terrestrial' ruminants on native forests in New Zealand. *Biological Conservation* 99: 65–79.

2. Do you have any comments on the benefits and/or costs associated with sambar deer?

NZFOA members sustain serious and widespread economic losses caused by sambar deer stripping bark from production stands in the 3 to 12-year-old age classes. The bark-stripping damage in Ernslaw One's forests has been well documented¹ through a series of ongoing monitoring plots, specific damage-assessment surveys, a Massey University post-graduate research project, and regular field observations noted during quality control operations. This damage is most prevalent in Santoft Forest, although it has also been recorded in the Tree Farm, Himatangi, Tangimoana, Pukehou, and Ngaruru Forests.

In February 2002, Ernslaw One conducted a specific damage survey within a range of stands (1991–1996 age classes) in Santoft Forest. Thirty-three percent of the 1,200 trees assessed had been damaged, with 20% of trees classed as 'heavily damaged'. Following this survey, a series of monitoring plots were established in Santoft Forest to determine ongoing levels of bark-stripping damage in young production stands (1996 and 1997 age classes). In the 1996 age class, 58% of trees had moderate to severe levels of damage. A resurvey in 2004 determined that this damage had risen to 74% of trees in some areas (Herrick 2004a, b). See appended photographs

Based on an economic analysis of these assessments, it is estimated that the financial loss will be up to 38% of the potential production value of these stands or an estimated \$3.5 million per annum. Furthermore, it should be noted that Ernslaw One maintains a non-pruned management regime in Santoft Forest. Such a regime leads to lower production value (cf. pruned) for these stands and also precludes potential employment opportunities (i.e. pruned stands would be of higher value and provide local employment opportunities).

In Waitarere Forest, Rayonier's preferred silvicultural regime for the management of the Radiata pine plantations would be to high prune all areas of moderate, or greater, productivity. However, bark stripping damage inflicted on newly pruned trees by Sambar deer drove Rayonier to cease all new pruning operations in 2001

The loss of stumpage revenue to Matariki has been quantified as the difference between that received for an undamaged pruned stand (that which can be produced in the absence of Sambar deer), minus the additional compounded costs associated with producing a pruned stand, and an unpruned stand (the most financially viable option

¹ It should also be noted that sambar deer damage to pine trees was reported as early as 1965 where sample counts in Waitarere Forest (Matariki's forest) recorded an average of 65% damaged stems per acre (source: NZFS (1965): Inspection of deer damage in Waitarere Forest and Ruahine Range by Parliamentary Select Committee, March 1965. Unpublished NZFS Report).

in the presence of Sambar deer). At a harvest age of 26 years in Waitarere Forest this equates to:

- 28% of the gross stumpage return, on average, on highly productive sites susceptible to moderate and high levels of bark damage. In excess of 600 hectares are affected.
- 23% of the gross stumpage return, on average, on moderately productive sites susceptible to moderate and high levels of bark damage. In excess of 500 hectares are affected.

Other direct and indirect costs associated with the presence of sambar deer and the current management regime include:

- As mature stands in Santoft Forest are harvested and replanted, newly planted stands will become vulnerable to damage if the status quo continues. This will add further to the predicted financial cost of \$3.5 million per annum.
- Light to medium damage in areas other than Santoft Forest. This includes Ernslaw One's Himatangi, Parewanui, Pukehou, and Ngaruru (Turakina Valley) Forests.
- Biosecurity and forest-health risks – increased exposure from damaged and weakened trees to fungal and insect attacks.
- Further loss of employment opportunities for local contractors – Both Rayonier Ernslaw One abandoned pruning operations in favour of structural thinning regimes (these are much less labour intensive).
- Damage to expensive forestry genetic and silvicultural research trials.
- Downstream effects of taking in excess of \$4 million per annum out of the local economy.
- Long-term market effects including the downgrading of all logs from forests other than Santoff by local wood processors, attributable to a perception that high levels of damage may well occur elsewhere.

These losses are totally unacceptable.

There are also likely to be additional future effects. If the status quo remains, sambar deer are likely to cause similar damage in other forests that are approaching maturity. Damage will occur after maturing plantations are harvested and replanted (ie over the next 10 years).

References:

Herrick, G. 2004a. Summary of sambar deer bark damage assessments – Santoft Forest. Unpublished Memo, Ernslaw One Ltd.

Herrick, G. 2004b. Sambar deer monitoring plots update – August 2004. Unpublished Memo, Ernslaw One Ltd.

3. *If management is retained should it be under an alternative regime to the one currently in place?*

Private land owners must be free to use the most efficient and cost-effective methods available to reduce problems associated with high numbers of sambar deer. Because deer are highly mobile, it would be desirable to co-ordinate control operations with other affected land owners including DoC.

4. *If management is retained under its current regime should the gazette notice be modified to allow for control operations to take place out of season to address localised problems?*

The gazette notice should be repealed so that private land owners can manage sambar deer in ways which best protect their interests. The current regime or any modification to it is completely unacceptable to NZFOA members who, as a result of its shortcomings, have sustained substantial financial losses.

5. *If controls remain in place should the gazette notice be modified to allow the season conditions of:*

- *Duration*
- *Limit bag*
- *Sex of animals taken*
- *Start date*

to be changed on an area by area and year by year basis?

The NZFOA will vigorously contest any of the above control conditions that might be proposed for the control of animal pests on private land or on Crown Forest Lease (CFL) lands. It is unacceptable for the Crown to require private land owners to maintain recreational hunting herds on their properties for the benefit of the general public. The NZFOA will not contest DoC's right to impose controls on the Conservation estate, or on lands administered by the Justice Department

6. *If controls remain in place are there any other season conditions that should be modified?*

The NZFOA submits that it is unacceptable that any form of closed hunting season remain in place on private land or on CFLs. NZFOA has no opinion on seasons that may be proposed for hunting on the conservation estate, or on land administered by the Justice Department.

7. *Given that land owners will be required by law to obey any modified season conditions, do you believe they should be required to have a licence to hunt sambar deer on their own land?*

The NZFOA will vigorously contest any attempt to impose season conditions for hunting on private land. Total removal of the hunting moratorium is the only acceptable outcome of the review process. That position is entirely consistent with the ministerial foreword accompanying DoC's Policy Statement on Deer Control (Appendix 2).

8. ***The current licence fee is used to support the administration of the sambar season, should it be limited to this or could it be used for other purposes such as sambar deer research, providing information on management options to public and land owners and other matters directly related to sambar deer management?***

NZFOA totally opposes the concept of a licence to hunt a pest species on private land or in CFLs (Appendix 3). However, if a licence fee is to be collected for hunting on the conservation estate, or on land administered by the Justice Department, provision should be made for the funding of sambar deer control operations in areas of the conservation estate adjoining privately owned plantation forests and CFLs.

NZFOA requests to be heard in any future hearings related to sambar deer management.

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Appendix 1. Typical damage photos



Plate 1 Bark stripping by Sambar deer, Santoff Forest



Plate 2 Pruned tree ring barked by Sambar deer, Santoff Forest



Plate 3 Sambar deer bark stripping along a road edge, Santoff Forest



Plate 4 Bark stripping within a forest compartment, Santoff Forest.

Appendix 2

Extract from the Ministerial (Sandra Lee) foreword to DoC's policy statement on deer control
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The right of New Zealanders to hunt deer on public conservation land for recreation, trophy value and venison is being enhanced through this policy statement. The existing hunter permit system will be streamlined and restrictions on recreational hunting will be removed, as a first step towards removing the need for hunting permits entirely. This will make it easier in future to hunt deer.

www.doc.govt.nz/Conservation/002~Animal-Pests/Policy-Statement-on-Deer-Control/index.asp

Note: All wild animals (including deer) are the property of the Crown (even on private land). They can be legally taken only with the permission of the land owner (in the case of the Crown, this means a hunting permit). Once taken, they are the property of the person who has legally taken them.

Appendix 3 – NZFOA NZFFA NZ Federated Farmers Joint Media Release

Land Owners Seek Right to Control Sambar Deer

04 Oct 2005

Forest owners and farmers on the North Island's west coast between Waverley and Otaki want the right to control sambar deer on their land.

The Forest Owners Association, Federated Farmers and the Farm Forestry Association say the deer cause major irreversible damage to young trees and farm crops, and should not have legal protection on private property.

They are encouraging their members in the region to respond to a Department of Conservation sambar policy review paper before submissions close on Friday.

Sambar were introduced to the Manawatu/Rangitikei area in 1875 and have since spread through the coastal sand dunes and along the major riverbeds as far inland as the Taihape district.

Unlike other deer species, they are protected by laws which dictate when and where they can be hunted. Licensed hunters may shoot no more than one sambar a year.

Forest Owners chief executive David Rhodes says forest owners need to be able to manage deer on their land in a way that recognises or protects their interests.

“Sambar deer tear large strips of bark from tree stems, leaving them severely scarred and often ring-barked. The worst damage is in newly pruned blocks where deer can easily reach the bare stem of the tree,” he says.

“This results in reduced tree growth and a devaluation of what would normally be the most valuable part of the stem. The affected section is typically discarded as waste.

“Losses in affected forests have been calculated at \$5000-\$7000 per /ha, or 20-30% of the value of the trees at harvest. Total damage to standing forests exceeds \$20 million.”

Ruth Rainey, president of Manawatu/Rangitikei Federated Farmers, says there is little public conservation land in the area, so sambar are mainly found on private land.

“They are secretive animals which often hide in plantation forests during the day, emerging at night to damage crops on neighbouring farms.

“Sambar are an important recreational hunting resource, but they are not endangered in New Zealand, nor in their country of origin, India. So there is no justification for the Department of Conservation preventing farmers from managing them.”

Mrs Rainey says some sheep and dairy farmers tolerate the deer, but there's an overwhelming consensus that they should have the right to manage or control the deer on their own land.

“There is concern about the possibility that sambar may spread Tb. Also some farmers are uncomfortable about having characters with high powered rifles wandering around their boundaries. Poaching is an issue in some districts.”

Farm Forestry Association spokesman Denis Hocking says sambar have the ability to destroy newly planted tree plantations overnight. He says existing regulations should be repealed, so farmers and foresters can use all appropriate methods to protect their crops.

He also points out that trees play a very important role in stabilising the sand dunes which are typical of the area.

“If damage by sambar is allowed to continue, forestry will become a less attractive option for land owners, raising the potential for loss of tree cover and increased wind erosion of this fragile dune country.”

Because some farmers accept the presence of their deer on their properties the viability of the herd will not be threatened if the hunting regulations are repealed, he says.

“There is also the potential for those who want to retain the hunting resource to actively manage it on private land. In this way those who carry the costs will get the benefits. That’s not the case at present.”