

Fiordland Wapiti Herd of Special Interest

Herd management plan consultation support document



Cover: Whio in Fiordland. *Photo: Fiordland Wapiti Foundation*

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Purpose of this document

This document provides information to support public notification of and submissions on the *Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan* (the Plan).

It includes additional context and background information, as well as series of questions and answers related to the Plan.

If you are interested in the Sika Herd of Special Interest, please see the *Sika Herd of Special Interest Draft Herd Management Plan* and related consultation support document.

How to have your say

- The public submission period on the Plan opens on Monday 10 November 2025 and closes on Monday 8 December 2025.
- Submissions are sought on the content of the Plan. It is important to note that submissions on the content of this consultation support document or the ministerial decision on whether to designate Fiordland wapiti as a herd of special interest are out of scope for this submission process and will not be considered.
- Submissions on the Plan should be made using this link: www.doc.govt.nz/wapiti-hosi-consultation
- This link the fastest and easiest way to have your say and make a submission on the Plan.

Alternatively, you can:

- email your submissions to wapitihosihmp@doc.govt.nz; or
- mail your submission to:
Wapiti HOSI Draft HMP Submissions
C/- Department of Conservation
PO Box 4715
Christchurch 8140

If you are sending an attachment by email, please send it in Microsoft Word or a searchable PDF format.

Summary of submissions and privacy

After the submission period closes, the Department of Conservation Te Papa Atawhai (the Department) will publish a summary of submissions on its website (doc.govt.nz). All submissions are subject to the Official Information Act 1982 and may be released, if requested, under that Act. If you have any objection to the release of any information in your submission, please clearly indicate which parts you consider should be withheld, together with the reasons for withholding the information and the grounds under the Official Information Act that you believe apply. The Department will consider this when making any assessment about the release of submissions.

Please also clearly indicate in your submission **if you do not wish your name, or any other personal information, to be disclosed** in any summary of submissions or external disclosures. Refer to the Department's privacy statement for further information: doc.govt.nz/privacyandsecurity.

What happens next?

The Department will review all the feedback on the Plan and report back to the Minister for Hunting and Fishing (the Minister). Your feedback will help to shape the Plan.

After the consultation period and revision of the Plan based on submissions, the Minister will decide whether and how to proceed with the Plan and whether to designate Fiordland wapiti as a herd of special interest.

Key context

Statutory context

A 'herd of special interest' is a statutory management tool set out in the Game Animal Council Act 2013. The herd of special interest tool enables the responsible Minister (currently the Minister for Hunting and Fishing) to designate a species of game animal in a specified area of public conservation land to be managed for hunting purposes.

Before the Minister can designate a species of game animal in an area as a herd of special interest, a herd management plan must be prepared. This herd management plan should specify how the herd of special interest will be managed, including management objectives and strategies.

The herd of special interest management tool is part of the overall conservation management framework, and the Game Animal Council Act specifies that the herd management plan must be consistent with relevant statutory plans and policies for the area where the herd of special interest is to be set up (see 'Overriding considerations' below).

The National Parks Act 1980 is not one of the overriding considerations, and Parliament is currently considering a Bill which would clarify that section 4(2)(b) of the National Parks Act (regarding extermination of introduced species) does not apply to a herd of special interest designated in a national park. However, a herd of special interest can only be set up in a national park if and where herd of special interest management is consistent with the park's management plan and the general policies for national parks.

Process to consider designating a Fiordland Wapiti Herd of Special Interest

1. Proposal and process initiation

In March 2025, the Minister for Hunting and Fishing received a proposal from the Fiordland Wapiti Foundation to establish a Fiordland Wapiti Herd of Special Interest in the Fiordland Wapiti Herd of Special Interest Area (the Wapiti Area) of Fiordland National Park.

The proposal was endorsed by the New Zealand Game Animal Council (the Game Animal Council), a statutory body established by the Game Animal Council Act with a range of functions in relation to game animals (deer, tahr, chamois and wild pigs). These functions include advising and making recommendations to the Minister, raising awareness of the views of the hunting sector, providing information and education, promoting codes of conduct and operating certification schemes, and liaising with hunters, representatives of tangata whenua and organisations to improve hunting opportunities.

The Minister agreed to initiate the statutory process to consider designating a herd of special interest for Fiordland wapiti and tasked the Department to undertake the process and develop a draft herd management plan.

2. Initial engagement

On behalf of the Minister, the Department undertook initial engagement with representatives of Treaty partners and consulted statutory stakeholders between May and August 2025 regarding the process to consider designating Fiordland wapiti as a herd of special interest.

The statutory stakeholders are identified in the Game Animal Council Act and include the Minister for Primary Industries, the Game Animal Council, the Director-General of the Department, relevant regional councils (in this case Environment Southland), the New Zealand Conservation Authority and the relevant conservation board (in this case the Southland Conservation Board). Consultation was also undertaken with the Royal Forest and Bird Protection Society of New Zealand Incorporated (Forest & Bird) and the Fiordland Wapiti Foundation.

3. Drafting the herd management plan

A herd management plan must be made for any species of game animal to be designated as a herd of special interest by the Minister.¹ The herd management plan sets out objectives and strategies for the management of a herd of special interest to achieve the expected benefits and must be consistent with the overriding considerations (see below).

The Fiordland Wapiti Foundation proposal, the Game Animal Council Act and the overriding considerations were the starting point for drafting the *Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan*. The Department shared an initial draft of the Plan with Treaty partners, statutory stakeholders, the Fiordland Wapiti Foundation and Forest & Bird in August and updated the Plan in consideration of the feedback received. The Minister considered the Plan and decided to proceed to notification.

4. Notification

The Plan is available online through the Department's website, and can be accessed through this link: www.doc.govt.nz/wapiti-hosi-consultation

Submissions open on Monday 10 November 2025 and close on Monday 8 December 2025.

Before making a plan, the Minister is required to publish a notice of his intention to do so in the New Zealand Gazette and daily newspapers in Auckland, Wellington, Christchurch and Dunedin.

Notices regarding the Minister's intention to make a plan for the proposed Fiordland Wapiti Herd of Special Interest have been posted in the Gazette and these newspapers for Monday 10 November 2025. Notices have also been placed in the *Southland Times*.

5. Submissions analysis and updating the Plan

After the submission period closes, all submissions will be considered and analysed, and a summary of submissions will be put on the Department's website. The Plan will be updated to reflect the submission process, ongoing conversations with Treaty partners and any follow-up engagement undertaken with statutory stakeholders as appropriate.

6. Minister's decision making

The revised Plan and a range of related materials will be provided to the Minister, who will decide whether to finalise the Plan and designate Fiordland wapiti as a herd of special interest.

If designated, the Minister can delegate some of his management powers to the Game Animal Council under section 20 of the Game Animal Council Act.

The timing of final decision making is at the Minister's discretion.

Other information relevant to the Plan

Ecological objectives and monitoring

The following ecological objectives are outlined in section 3 of the Plan:

- Fiordland wapiti are managed in a manner that allows for the maintenance of natural biodiversity by restoring ecological processes and communities of browsed indigenous flora and preventing the loss of indigenous species from their current range.
- Knowledge and understanding of the dynamics between Fiordland wapiti and indigenous species and ecosystems are improved.

Specific actions to achieve these objectives will be designed, planned and delivered as part of an annual operational plan.

¹ Game Animal Council Act 2013, section 19.

A more specific ecological target is not set in the Plan, as a blanket target would not recognise variations in local conditions, including topography, habitat type, species distribution and wapiti behaviour, or effects throughout the Wapiti Area.

Ecological targets will require ongoing revision based on management results and updated monitoring information. It is intended that publicly accessible annual reports will provide information on activities undertaken to achieve the objectives.

Interim targets that show positive change, or at least no net decline in the components of the objective, could be considered for inclusion in the annual operational plans. This would allow management and targets to be adapted over time. This could include, for example:

- no loss of representation of plant functional groups in the browse tier;
- maintenance of palatable plant size class structures;
- maintenance of canopy species size class structures; or
- reduced incidence of browse on palatable plants.

Related monitoring actions will also be undertaken, in accordance with relevant standardised protocols and standards that are used or set by the Department. These may include, but are not limited to, the following methods and tools:

- Seedling ratio index
- Permanent 20 x 20 metre plots
- Alpine deer browse
- Faecal pellet counts

Key development steps in monitoring programmes include design, piloting, implementation and systems development. Each step is critical to ensure that monitoring is effective, efficient and aligned with management objectives. Reporting is then required to allow the collected data to be used to evaluate progress in achieving the objectives and determine if management is effective.

It is intended that the monitoring programme undertaken as part of the Fiordland Wapiti Herd of Special Interest will follow these key steps.

Fees

For many years, a fee has been charged for hunting wapiti in Fiordland National Park during the bugle (mid-March to late April). It is anticipated that this will continue for the Fiordland Wapiti Herd of Special Interest.

Overriding considerations

The Plan is designed to be consistent with overriding considerations, as required by the Game Animal Council Act.

Under that Act, 'overriding considerations' means:

- (a) the welfare and management of public conservation land and resources generally;
- (b) any statement of general policy that is made, or has effect as if it were made, under—
 - (i) section 17B of the Conservation Act 1987;
 - (ii) section 44 of the National Parks Act 1980;
 - (iii) section 15A of the Reserves Act 1977;
 - (iv) section 14C of the Wildlife Act 1953;
- (c) any conservation management strategy made under section 17D of the Conservation Act 1987;
- (d) any conservation management plan made under—
 - (i) section 17E of the Conservation Act 1987;
 - (ii) section 40B of the Reserves Act 1977;
- (e) any management plan made under—
 - (i) section 47 of the National Parks Act 1980;
 - (ii) section 41 of the Reserves Act 1977;
- (f) any wild animal control plan made under section 5 of the Wild Animal Control Act 1977;
- (g) any pest management strategy, pest management plan, pathway management plan, or operational plan made under the Biosecurity Act 1993.

The policy, strategy and plan overriding considerations that are relevant to the Plan are the:

- *General Policy for National Parks 2005*;²
- *Southland Murihiku Conservation Management Strategy 2016*;³
- *Fiordland National Park Management Plan 2007*;⁴ and
- *Southland Regional Pest Management Plan 2019–2029*.⁵

General Policy for National Parks 2005

The Plan has been written to be consistent with provisions in the *General Policy for National Parks*,⁶ including:

- section 2: Treaty of Waitangi Responsibilities – regarding consultation with tangata whenua;
- section 4.1: Indigenous species, habitats and ecosystems – regarding preventing loss of, preserving, maintaining and restoring indigenous species;
- section 4.3: Biosecurity and management of threats to indigenous species, habitats and ecosystems – including regarding eradicating, where practicable, and controlling widespread introduced species;
- section 8.1: Planning and management in general – regarding item (c):
Planning and management for recreation and other opportunities for the benefit, use and enjoyment of each national park should:
 - i) preserve national park values, including natural quiet, as far as possible;
 - ii) minimise adverse effects, including cumulative effects, on national park values;
 - iii) provide for a range of experiences to enable people with different capabilities, skills and interests to have the opportunity to benefit, use, enjoy, and gain inspiration from national parks; and
 - iv) maintain the distinctive character of recreation in New Zealand national parks, including the traditional New Zealand backcountry experience with its ethos of self-reliance.
- section 8.3: Hazards to people – regarding item (b):
Recreational activities that create hazards for other people should be managed to reduce the risk of harm.

Southland Murihiku Conservation Management Strategy 2016

The Plan has been written to be consistent with provisions in the *Southland Murihiku Conservation Management Strategy*,⁷ including:

- section 1.5.4: Community engagement – regarding working with the Game Animal Council on improving hunting opportunities;
- section 3.20: Wild animals – regarding wild animal management and control activities in wilderness areas, as well as aircraft movements in the Glaisnock Wilderness Area;
- section 3.21: Game animals – regarding working with the Game Animal Council to facilitate hunting of game animals on public conservation land; and
- Appendix 6: Threats or pests and wild animals present in Southland Murihiku.

Fiordland National Park Management Plan 2007

The Plan has been written to be consistent with provisions in the *Fiordland National Park Management Plan*,⁸ including:

- Part 2: Treaty of Waitangi Relationships – regarding consultation, recognition as kaitiaki and support of Kaitiaki Roopu;

² New Zealand Conservation Authority. 2005. *General Policy for National Parks*. Wellington: Department of Conservation. doc.govt.nz/national-park-policy

³ Department of Conservation. 2016. *Southland Murihiku Conservation Management Strategy*. Wellington: Department of Conservation. doc.govt.nz/southlandcms

⁴ Department of Conservation. 2007. *Fiordland National Park Management Plan*. Invercargill: Department of Conservation. doc.govt.nz/fnp-management-plan

⁵ Environment Southland. 2019. *Southland Regional Pest Management Plan 2019–2029*. Invercargill: Southland Regional Council. es.govt.nz/about-us/plans-and-strategies/regional-plans/southland-regional-pest-management-plan

⁶ doc.govt.nz/national-park-policy

⁷ doc.govt.nz/southlandcms

⁸ doc.govt.nz/fnp-management-plan

- Part 3: Te Wāhipounamu – South West New Zealand World Heritage Area – regarding the objectives;
- section 4.5: Introduced Animals – regarding objectives 1, 2 and 7, and implementations 4, 5, 9, 10, 11, 12, 18, 23, 28 and 29;
- section 5.2: Visitor Audit – regarding recognition of the trophy value of wapiti;
- section 5.3.6.3: Western Remote Setting – regarding the Wapiti Area;
- section 5.5: Aircraft Access – regarding the use of aircraft, objectives 1 and 3, and wild animal recovery operations; and
- section 5.11: Recreational Hunting of Wild Animals – regarding the rationale, objectives and implementation.

Southland Regional Pest Management Plan 2019–2029

Environment Southland's operative *Southland Regional Pest Management Plan 2019–2029* does not include or contain provisions applying to Fiordland wapiti.

Te Wāhipounamu – South West New Zealand World Heritage Area

The Wapiti Area of Fiordland National Park is part of the United Nations Educational, Scientific and Cultural Organization (UNESCO) Te Wāhipounamu – South West New Zealand World Heritage Area.

The Department is in contact with the UNESCO World Heritage Committee regarding the proposed designation of Fiordland wapiti as a herd of special interest and development of the Plan.

An assessment of the effects of the proposed designation of Fiordland wapiti as a herd of special interest on World Heritage Area values will be undertaken before any final decisions are made on the Plan and designation of the herd.

Additional Q&As

Additional questions and answers are provided below to support submissions on the Plan.

Fiordland wapiti and Fiordland National Park

Q. How many wapiti are there in Fiordland? What is the best estimate the Department can give?

The Department does not count the exact number of wild animals present in an area. Wild animal populations are mostly monitored by carrying out faecal pellet counts (providing an index of abundance) and calculating removal rates. Both methods are inexact.

Monitoring and reported removals by the Fiordland Wapiti Foundation suggest that there are thousands rather than tens of thousands of deer in the Wapiti Area.

Q. Why should we be protecting introduced species in national parks?

The designation of Fiordland wapiti as a herd of special interest, and development of a related herd management plan, is not about protecting Fiordland wapiti. The designation of a herd of special interest allows a herd of a specific game species in a specific area to be managed sustainably for both hunting and conservation outcomes.

Management actions for a herd of special interest are informed by a herd management plan, which is reviewed every 5 years. Currently, the National Parks Act 1980 seeks the extermination of introduced animals as far as possible from national parks. However, achieving eradication in what are often vast, remote and hard-to-access areas would require significant resources, and so is unlikely to be technically viable and would draw resources away from control and eradication efforts elsewhere.

Q. How does the Department measure the impacts of wapiti in Fiordland?

The Department uses a variety of methods to measure the impacts of wild animals (including wapiti, red deer and chamois) in both alpine and forest communities. Often, when we evaluate impacts, we focus on the plant species deer eat, particularly the preferred ones, and compare them with plant species deer avoid eating.

In forested areas, we use the seedling ratio index (SRI) method. This measures the ratio of tall to short seedlings grouped into preference classes to assess browsing impact. More short records (negative SRI) indicates that regeneration of the group is impeded, while more tall records (positive SRI) suggests that regeneration is likely. When animal numbers are very high, negative scores are more likely for plants that are preferred by deer compared with those that are avoided. We have used this method in three study catchments in the Wapiti Area.

In alpine areas, we currently measure deer browse on three preferred alpine herbs at sites spread across the Wapiti Area. All plants are counted along transects and scored for browse. More browse on these species suggests higher deer impacts in the wider alpine ecosystem. Declines in plant counts may also indicate adverse deer impacts from increased mortality or reduced recruitment.

Q. How would the designation of Fiordland wapiti as a herd of special interest differ from existing management of deer in Fiordland National Park?

Some people value wild deer, pigs, tahr and chamois for food, sporting or business purposes.

New Zealand's conservation framework generally seeks to reduce the impacts of wild animals, along with other threats, on public conservation land to maintain and enhance the regeneration of native vegetation and protect indigenous ecosystems.

A herd of special interest designation would allow Fiordland wapiti to also be managed for hunting purposes, while ensuring that conservation values continue to be protected.

Hunting

Q. What does 'managed for hunting purposes' mean?

The Minister is required to have regard to the advice of a range of parties when considering whether animals can be 'managed for hunting purposes'. This could be to manage a healthy population of animals with a specific herd composition (for example, a specific ratio of young to old animals, or males to females) that produces the animal traits (for example, hides, meat, antlers) that hunters value, and to manage or coordinate hunting demand.

Q. What authorisations or permits will I need if I want to hunt in the Wapiti Area?

Hunters will need to obtain a hunting authorisation to hunt Fiordland wapiti within the Wapiti Area. This requirement will apply at all times of the year.

This authorisation will be similar to the hunting permit that hunters are currently required to obtain from the Fiordland Wapiti Foundation and the Department (depending on whether they are hunting during or outside the annual bugle period).

Q. What conditions will apply to hunting Fiordland wapiti within the Wapiti Area? Why aren't these discussed in detail in the Plan?

It is anticipated that hunting conditions for Fiordland wapiti will be similar to existing arrangements – but this will be confirmed as part of annual operational herd of special interest planning, in accordance with the requirements of the Game Animal Council Act.⁹

The Plan

Q. Who does the Plan apply to?

The Plan sets out a range of objectives and strategies that determine how the Minister's powers for managing the herd of special interest are to be exercised. Any entity undertaking Fiordland wapiti herd management activities, whether the Game Animal Council, the Fiordland Wapiti Foundation or the Department, will be required to act in accordance with the Plan.

⁹ For example, Game Animal Council Act 2013, section 18(1)(d).

Q. Why has the Plan been prepared at the direction of the Minister for Hunting and Fishing rather than the Minister of Conservation?

The Game Animal Council Act provides a ministerial power to establish herds of special interest, by way of notice, and to manage herds of special interest. The Minister for Hunting and Fishing is the relevant Minister for the purposes of the Game Animal Council Act, including for the designation of a herd of special interest and development of the Plan.¹⁰

The Minister for Hunting and Fishing has exercised these powers in the making of the Plan and the proposed designation of the Fiordland Wapiti Herd of Special Interest.

Q. Why doesn't the Plan set out a target animal density for the Wapiti Area?

Effective population management focuses on whether the ecological objectives are being achieved. Determining animal density in the rugged terrain of the Wapiti Area is difficult, expensive and imprecise, and these animals are liable to continuously move throughout the area. The correlation between deer density and the level of browse is also difficult to quantify and depends on several factors, including herd composition and demographics (age, weight and sex) and the characteristics of the plant community (density and presence of more palatable or less palatable species). Therefore, it is not desirable to fix set density targets.

Q. The Plan mentions 'adaptive management'. What does that mean?

Adaptive management is a term used in environment and resource management to describe a learning-based approach where management responds to changing conditions and new information.

An adaptive management approach acknowledges that there is uncertainty about how ecological systems function and respond to management actions. It is designed to improve understanding of how a system works and use this knowledge to move towards the desired outcomes.

As a result, an adaptive management approach is often used to make decisions in an environment with multiple management objectives, constrained management authorities, dynamic ecological systems and uncertainty about the responses to management actions.

Adaptive management often requires the participation of multiple stakeholders to help assess the problem, design activities to solve it, implement and monitor the activities, and evaluate the results.

Q. Recreational hunters can contribute to managing populations, so why does the Plan mention professional animal control?

Hunting deer in the remote and rugged terrain of Fiordland National Park is challenging. Records of deer removed directly by recreational hunters are currently only submitted during the ballot period (mid-March to late April). Numbers reported usually amount to less than 100, with hunters encouraged to leave the management of deer numbers up to the Wapiti Foundation. The Department does not have data on the number of animals removed by recreational hunters outside the ballot period. However, recreational hunting alone is not enough to control deer numbers in the Wapiti Area.

Q. The Plan mentions benefits expected to be gained by managing the animals for hunting purposes. Benefits are also discussed in the Minister's Foreword. Why are these benefits not fully set out in the Plan?

The benefits expected to be gained by managing Fiordland wapiti for hunting purposes will be set out in a future Gazette notice, should the Minister ultimately decide to designate Fiordland wapiti as a herd of special interest. This reflects the requirements and process set out in the Game Animal Council Act.¹¹

Q. How often will the Plan be reviewed?

The Game Animal Council Act requires that the Plan is reviewed at intervals of not more than 5 years.

¹⁰ Further information on ministerial portfolios is available at dpmc.govt.nz/cabinet/portfolios/hunting-and-fishing.

¹¹ Game Animal Council Act 2013, section 16(3).