



Briefing: Sika HOSI proposal

To	Minister for Hunting and Fishing	Date submitted	21 March 2025
Action sought	Agree to initiate Game Animal Council Act statutory process to develop a Herd of Special Interest for sika deer in the Kaimanawa and Kaweka forest parks.	Priority	Normal
Reference	25-B-0097	DocCM	DOC-7896869
Security Level	In Confidence		
Risk Assessment	Medium No major risk associated with initiating HOSI development statutory process, but will likely raise expectations among some stakeholders. Some conservation stakeholders may view HOSI development negatively.	Timeframe	31 March 2025
Attachments	Appendix A – DOC commentary on sika HOSI proposal		
Contacts			
Name and position			Phone
Stephanie Rowe, Deputy Director-General, Biodiversity, Heritage & Visitors			s9(2)(a)
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Executive summary – Whakarāpopoto ā kaiwhakahaere

1. You recently received a proposal for a Herd of Special Interest (HOSI) from the Central North Island Sika Foundation (CNISF). This briefing provides DOC's summary and evaluation of the proposal and seeks your decision to initiate the statutory process to develop a sika HOSI.
2. The CNISF proposal is for a HOSI managing sika deer in the Kaimanawa and Kaweka Forest Parks, located east of Tongariro National Park. The proposed management objectives are to reduce animal numbers down to a level that makes for a sustainable, high-quality hunting resource and ensures that the forest in the two parks can regenerate. DOC considers that HOSI management, with appropriate targets and resourcing, would improve both habitat and animal health.
3. DOC considers that the CNISF proposal serves as a fair basis for developing a sika HOSI and we recommend that you agree to initiate the statutory development process. However, we note that there are matters that will need to be addressed during this process, including exact formulation of conservation targets and monitoring methods, ensuring a practical management structure and delegation of management powers.
4. HOSI would have financial implications for DOC. The CNISF proposes that DOC fund roughly 50% of the operation costs (around \$480,000 p/a). However, DOC has some concerns that the CNISF may not be able to raise all the funds they intend to. The CNISF contribution is estimated at between \$313,500 and \$426,000 per annum. Since statutory responsibility will sit with the Crown, DOC will likely need to be prepared to cover these costs as well (i.e., between \$823,000 and \$917,000 p/a). This will be an area for discussion and development during the statutory development process.
5. DOC considers we could cover HOSI operation cost via a combination of IVL funding that has been secured for years 2025/26 and 2026/27 (and potentially 2027/28), and internal reprioritisation in subsequent years.
6. DOC has identified five Treaty partner groups whose rohe/takiwā or areas of interest overlap with the proposed sika HOSI area. We propose to engage with these groups on a consultative basis, in a similar manner to the named statutory stakeholders in the GAC Act.
7. If you agree to initiate, DOC will lead the statutory process to develop a Herd Management Plan (HMP) in consultation with statutory stakeholders and Treaty partners. The HMP will then be presented to you, and your decision will be sought to progress to public notification of the plan. Following public notification, officials will make any necessary adjustments and then seek final decisions from you to formally designate the HOSI.
8. DOC considers the statutory development stage is the appropriate time to work through these issues and recommend that you agree to progress to this stage.
9. Initiating development of a HOSI does not commit the Government to designating the HOSI. If you aren't satisfied with the draft HMP that is produced, you can decline to progress it to public notification – and you retain the option to pause the process after public notification as well.

We recommend that you ... (Ngā tohutohu)

		Decision
1.	Note that you have received a proposal for Herd of Special Interest from the Central North Island Sika Foundation.	Noted
2.	Agree to initiate the Game Animal Council Act 2013 process to develop a Herd of Special Interest for sika deer in the Kaimanawa and Kaweka Forest Parks.	Yes / No
3.	Agree that during the statutory process to develop a Herd of Special Interest, DOC will consult with relevant Treaty partners and seek their views in a similar manner to the statutory stakeholders named in the GAC Act.	Yes / No
4.	Agree to forward a copy of this briefing to the Minister for Conservation for their information.	Yes / No
5.	Note that DOC will work with your office to support you announcing the initiation of the statutory development process, should you choose to do so.	Noted



Date: 21/03/2025

Stephanie Rowe
Deputy Director-General, Biodiversity,
Heritage & Visitors

Date: / /

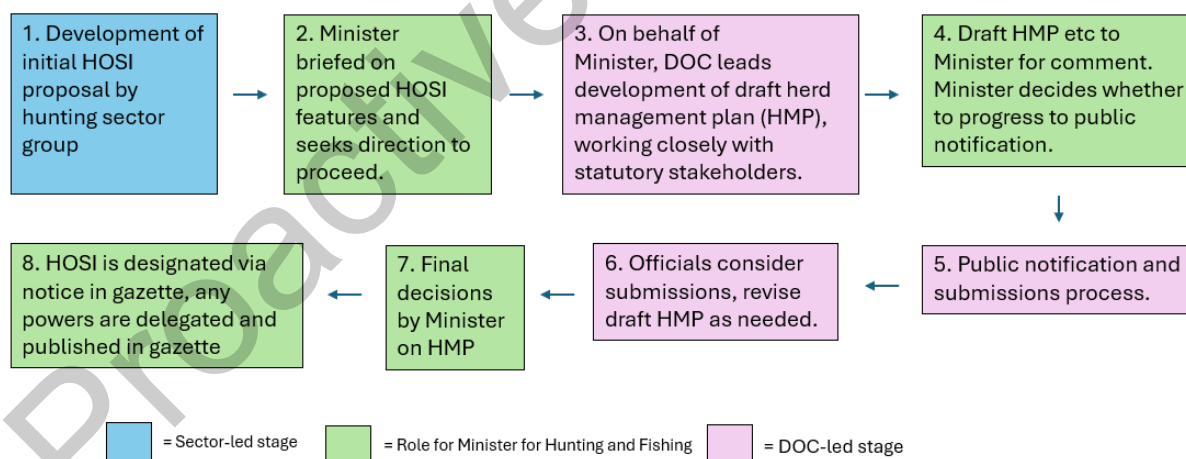
Hon James Meager
Minister for Hunting and Fishing

Purpose – Te aronga

1. This briefing provides a summary and evaluation of the Central North Island Sika Foundation's (CNISF) proposal for a Herd of Special Interest (HOSI) and seeks your agreement to formally proceed to the statutory development phase for the proposed HOSI.

Background and context – Te horopaki

2. On 3 March 2025, you received a proposal for a HOSI for sika deer (*Cervus nippon*) from the CNISF. Development of the proposal was supported by the Game Animal Council (GAC) and DOC provided technical information to the GAC and CNISF during this process.
3. A HOSI is an instrument under the Game Animal Council Act 2013 (GAC Act) that enables a herd of game animals on public conservation land (PCL) to be managed for hunting purposes where this is consistent with conservation outcomes.
4. The next step in the process is for you as the Minister to determine whether to initiate the formal statutory development phase based on this proposal.
 - During the formal process, a draft Herd Management Plan (HMP) will be developed by officials in consultation with key stakeholders and Treaty partners. This draft plan will then be provided to you for comment and feedback. Our indicative timing for these steps is April – August 2025.
 - Once you are satisfied with the draft HMP, you may then agree to progress to public notification of the plan.
 - Following the public submission period, officials will make any necessary revisions to the plan and then provide it to you for final decisions.
5. This briefing provides DOC's assessment of the CNISF proposal, including flagging of key issues that we consider will need to be addressed during the statutory development phase (this is stage 2 in the flow diagram below).



Sika deer and the CNISF

6. Sika deer originated in Japan and have been present in New Zealand for over 100 years. The Kaimanawa/Kaweka herd traces its origins back to the release of six animals gifted by the Duke of Bedford.
7. The central North Island is the only place in the southern hemisphere where sika deer can be legally hunted on public land. Sika are popular with hunters – particularly during the roar period that runs from late March to early May – given their unique calls and behaviours.

8. The CNISF is a hunter-led organisation set up in 2015 with the key objective of achieving HOSI status for the sika herd. The foundation's vision is "A healthy sika hunting resource, thriving in resilient natural habitats, valued by stakeholders".

Summary and assessment of sika HOSI proposal

9. Below is a high-level summary of the key elements of the CNISF proposal as well as a high-level summary of DOC's assessment of the key elements of the proposal. A more detailed discussion is provided in Appendix 1.

CNISF proposed scope

10. The CNISF proposal is for a HOSI managing sika deer across the Kaimanawa and Kaweka forest parks (located east of Tongariro National Park). The total area of PCL proposed to be covered by HOSI management is 125,634 ha, divided into 9 management units.
11. This proposed scope would cover roughly 16% of the sika feral range. The rest of the population exist on adjacent private land.
12. **DOC considers the proposed scope of the sika HOSI is realistic** (in terms of management capability for the CNISF, DOC, and GAC), and that the proposed management units are practical, based on catchments and dividing ranges.
13. We also note that a key issue to work through during the development phase will be the management implications of movements of sika into and out of the HOSI area to adjacent private land (cf. paragraphs 2-8 in Appendix 1).

CNISF proposed management objectives

14. The main HOSI management objectives proposed by the CNISF are to:
 - reduce animal numbers down to a level that is compatible with sustainable forest canopy regeneration, and
 - enhance hunter participation in herd management and enhance hunter satisfaction with sika venison quality and the overall sika hunting experience.
15. **DOC considers the management objectives to be reasonable**, but require some refinement (e.g., by including specific biodiversity targets) during the development process to ensure they enable progression towards maintaining forest canopy regeneration processes and protecting, for example, native snail populations vulnerable to the impacts of ungulates.
16. Currently, overpopulation is a serious concern for both animal and habitat health (for both CNSIF and DOC). Too many deer prevents the forest from regenerating, and competing for food results in malnourished deer. Unlike red deer, sika deer find mountain beech seedlings palatable and prevent any saplings from repopulating gaps in the canopy – ultimately this threatens canopy collapse and the conversion of the forest to low scrubland.
17. HOSI management, with appropriate targets and resourcing, will reduce the overall size of the herd to a more sustainable level – providing conservation benefits by enabling enough mountain beech saplings to grow above the browsing height of sika deer, and enabling these saplings to close canopy gaps over time and help prevent forest collapse. It will also reduce competition for food and thereby increasing the quality of the animals (antlers, hides and meat).
18. Although we expect that most of the hunting community will understand and accept that total animal numbers need to be reduced under HOSI management, there may be some who view negatively any reduction in the availability of animals to hunt. The statutory development process can be used to further test stakeholder views around this.

CNISF proposed management strategies

19. The main strategies proposed to achieve these outcomes are
 - coordination of voluntary sika hunting activities (proposed to be CNISF-led)
 - monitoring of herd health (CNISF-led) and habitat health (proposed to be DOC-led), as well as
 - professional culling (proposed to be done by CNISF and DOC-funded).
20. **DOC considers the proposed management strategies to be reasonable** but also note that professional aerially assisted culling will need to be the primary population management method in the first few years of HOSI implementation. This is because many management units are overpopulated currently, and we know that voluntary hunting efforts are not sufficient to address this on their own. We understand the CNISF generally accepts this, and we are confident we'll be able to strike the right balance of management approaches in the herd management plan.
21. Adaptive management of the sika herd within a HOSI, with appropriate monitoring, will increase our understanding of the management settings required to ensure forest health is improved long term.
22. DOC also consider it likely to take some time before the CNISF can attract the amount of voluntary labour they indicate they intend to – though this should get easier as the quality and prestige of the herd increases over time (see also funding structure discussion at paragraphs 29-31 below).

CNISF proposed organisational structure

23. The CNISF proposes an organisational/management structure where the GAC, DOC and the CNISF all have key roles and responsibilities:
 - It is proposed that all the Minister's HOSI management powers (i.e., authorising management operations, issuing HOSI hunting permits¹) be delegated to the GAC
 - DOC is proposed to lead ecological monitoring, providing regulatory oversight, and operational support and administrative support.
 - The CNISF would function as a contractor, undertaking operations on behalf of whoever holds the management powers (GAC and/or DOC)
24. The CNISF proposal also notes that they have discussed Sika HOSI management with some key mana whenua groups, and that the CNISF "openly invites mana whenua who have an interest to become actively involved in Sika HOSI management".
25. The GAC Act only allows for statutory HOSI management powers to be exercised by the GAC or DOC. However, the Act does not put any boundaries around who can be contracted by either DOC or GAC to undertake the type of operations outlined in the proposal (i.e., culling, herd monitoring, coordination of voluntary management hunts). This means, for instance, that the CNISF can perform these functions.
26. **DOC considers the proposed management structure to be broadly practical.** However, we believe it may be necessary for statutory powers to be exercisable by both the GAC and DOC to enable smooth operations around e.g., permitting and habitat monitoring, as well as financial delegations. For example, if DOC is proposed to fund and undertake vegetation monitoring directly, DOC may need to have associated management powers. These issues will need to be worked through during the statutory phase.

¹ DOC will continue to be responsible for issuing hunting permits for the hunting of non-HOSI animals in the area (red deer, wild pigs, goats etc), while permits to hunt HOSI animals are proposed to be managed by the GAC.

27. DOC has a good working relationship with the CNISF. The CNISF received Jobs for Nature funding to undertake deer control in the Remote Experience Zone of the Kaimanawa Forest Park between 2022 and 2025. DOC has actively supported the Sika Foundation with this work.
28. However, we note that the CNISF is a relatively new organisation that does not have the level of management experience or fundraising capabilities that e.g., the Fiordland Wapiti Foundation has. The GAC and DOC may need to support the CNISF to further develop their capacities if a sika HOSI is designated.

CNISF Proposed funding structure

29. The CNISF estimates the annual operational cost of the proposed HOSI to be between \$823,000 and \$917,000 in the first five-year period.
30. The CNISF proposes that the Crown (via DOC and/or GAC) fund approximately 50% of this cost (averaging \$480,000 p/a). The remainder would be funded by the CNISF, primarily through fundraising and in-kind contributions of voluntary labour and professional expertise.
31. The CNISF contribution is estimated at between \$313,500 and \$426,000 per annum:
 - This contribution includes \$150,000 for project management (1.5 FTE) which is currently funded mainly by Jobs for Nature which ends in May 2025. The CNISF writes that they intend to gradually cover this cost via increased fundraising.
 - The CNISF has included a plan to reduce the Crown's contribution to the project management (FTE) cost by increasing their fundraising year-to-year. Their long-term strategy to achieve this centres on approaching "11 high net worth individuals, corporates and businesses to assist with funding of the CNISF financial commitments."
 - The remainder of the CNISF contribution is proposed to come from volunteer labour undertaking hunting, herd health monitoring and providing expert advice (at an estimated worth of \$150,000 p/a).
32. The table below shows the high-level CNISF proposed funding structure:

Contributions	Year 1 (25-26)	Year 2 (26-27)	Year 3 (27-28)	Year 4 (28-29)	Year 5 (29-30)	Total
	\$	\$	\$	\$	\$	\$
Crown direct	510,000	480,500	536,000	459,000	397,000	2,382,500
<i>Underwriting</i>	37,500	67,500	105,000	140,000	135,000	485,000
CNISF direct	313,500	343,500	381,000	426,000	426,000	1,890,000
<i>Underwriting</i>				10,000	15,000	25,000
Total direct cost	823,500	824,000	917,000	885,000	823,000	4,272,500
Total cost (incl. underwriting)	861,000	891,500	1,022,00	1,035,00	973,000	4,782,500

33. **DOC considers the estimated cost to run the HOSI (between \$823,000 and \$917,000 p/a) to be realistic.**
34. DOC officials have determined that DOC can cover the Crown portion of the Sika HOSI funding (around \$480,000 per annum) via a combination of IVL funding for years 2025/26 and 2026/27 (and potentially 2027/28), and via internal reprioritisation in subsequent years. This will be an ongoing cost for DOC for the duration of the HOSIs operation, unless alternative sustainable funding sources are established. DOC has been funding deer control and monitoring work in this area over recent years (but not to the extent required across the whole proposed HOSI area).

35. The IVL funding DOC has secured for the next two years enables important work on deer control and biodiversity monitoring in the Kaimanawa and Kaweka Forest Parks – work that can feed into and serve as a basis for potential HOSI operations in the future.
36. DOC will also need to be prepared to cover the costs that the CNISF intends to cover, in case they are not able to produce their stated resources. The CNISF proposal suggests that the Crown only needs to be prepared to cover ('underwrite') a portion of the CNISF funding, but in practice it will likely be necessary for the Crown (via DOC) to budget for and be prepared to cover all HOSI related management costs (if funds or resources from the CNISF does not eventuate).
37. This is because the CNISF will not be legally responsible for the implementation of the herd management plan. DOC and/or the GAC will be statutorily responsible (acting on behalf of the Minister) and will therefore need to be prepared to cover the full cost of the necessary operations should the need arise.
38. DOC considers there is a risk that the CNISF contribution will fall short of their targets, e.g., if fundraising efforts prove less effective than hoped for, or if there are fewer voluntary labour hours than expected.
39. The CNISF proposes to have no fees for hunting sika that is part of the Sika HOSI in the first five-year period, but note that fees may be considered for subsequent five-year management cycles as part of cost recovery options. DOC agrees that fees would be inadvisable in the first five years, and we also think it unlikely that fees will be able to contribute significantly to cost recovery in the longer term (see further discussion in paragraphs 20-27 in Annex 1).

DOC recommends progressing with work on a sika HOSI

40. DOC considers the CNISF proposal provides a fair starting point for the development of a sika HOSI, and we recommend that you agree to progress to the statutory development phase.
41. The purpose of the initial proposal is to provide a starting point for the process to develop the HOSI, and it is an important opportunity for the hunting sector to put forward their vision for how the hunting community can deliver value for conservation as well as hunting outcomes.
42. If you agree to progress the sika HOSI proposal to the formal development stage, DOC, as the agency administering the GAC Act, will lead the statutory process on your behalf (working closely with the GAC and the CNISF). During this process, DOC will consult with the statutory stakeholders specified in the GAC Act, namely:
 - the Minister for Primary Industries;
 - the Game Animal Council;
 - the Director-General of Conservation;
 - any relevant regional council (i.e., Manawatū-Whanganui, Hawke's Bay, Waikato)
 - the New Zealand Conservation Authority
 - any relevant conservation board (i.e., Tongariro Taupō and East Coast Hawke's Bay Conservation Boards)
43. In addition, we will consult with the Treaty partner groups whose rohe/takiwā or areas of interest overlap with the proposed sika HOSI area (cf. paragraph 55-61 below)

44. The final design of the sika HOSI will not look exactly like the CNISF proposal, as this will be refined via consultation with stakeholders and Treaty partners during the statutory process – but we don't expect major changes to scale and scope.
45. To be designated, a HOSI is required to be consistent with the "overriding considerations" listed in the GAC Act – i.e., key conservation legislation and statutory plans. DOC is confident that the CNISF proposal provides a good basis for development of a sika HOSI that will be compatible with the overriding considerations.
46. In addition to the points noted in the previous section, we have identified the following key issues that need to be worked through during the statutory development phase, but we believe are achievable:
 - The recreational hunting areas (RHAs) in both the Kaimanawa and Kaweka Forest Parks will need to be removed for the HOSI to operate effectively. The Director-General of Conservation has the power to do this, but we understand there are some differing views among hunting stakeholders about the RHAs which we want to work through during the development phase.
 - Formal management structure and delegation of Minister's powers: As signalled above, it may be necessary to delegate management powers to both GAC and DOC to enable DOC to undertake management activities directly and to line up permitting systems.
 - Treaty partner views around HOSI management, and their aspirations for HOSI objectives, strategies and outcomes: There are multiple iwi with interest across the proposed HOSI area. There is a risk not all can adequately engage in this process within our desired timeframes, due to other competing priorities. There are strong concerns from some Māori around the poor health of North Island forest parks, including the impact of deer and other ungulates on these parks.
 - The proposal seeks to establish a bookable helicopter-accessed roar-block system in the Kaimanawa Remote Experience Zone. This aspect of the proposal is likely to attract stakeholder scrutiny, and it may need to be modified to reflect statutory provisions around helicopter use in wilderness areas.
47. DOC considers the statutory development stage is the appropriate time to work through these issues with and anticipate that they can be addressed during that phase.

Risk assessment – Aronga tūraru

48. There are no major risks with deciding to progress with developing a sika HOSI. Initiating this process does not commit the Government to a sika HOSI. You retain the option to decline to approve the final HOSI design that is produced via this process.
49. Note, however, that if you announce the start of the process to develop a sika HOSI, this will create expectations among hunting stakeholders that a HOSI will be delivered. This risk can be mitigated by making it clear in public communications that the outcome of the statutory development process is not predetermined and must be allowed to run its course.
50. Around the development process, there is a minor risk that the issues we have identified will not be able to be addressed to the satisfaction of key stakeholders during this process. DOC considers this risk can be managed via the engagement and public notification process.
51. There is a risk that Treaty partners will not be willing or able to engage during the statutory development process. DOC is managing this risk by proactively reaching out to relevant Treaty partner groups and informing them of the HOSI process to give them time to prepare to engage.

52. There is a risk that some conservation stakeholders will view negatively the start of work to designate a sika HOSI because they are opposed to HOSI in general. This risk can be mitigated by clear communications around the conservation benefits of HOSI-type management for the conservation areas (e.g., helping prevent forest collapse).
53. If you do not agree to initiate the statutory process to develop a sika HOSI now, there is a risk that a sika HOSI won't be delivered before the end of the term. This would likely be viewed negatively by the hunting community.

Treaty principles (section 4) – Ngā mātāpono Tiriti (section 4)

54. The GAC Act includes requirements to engage with certain named statutory stakeholders (cf paragraph 41 above) but does not include provisions around engaging with Treaty partners.
55. However, the Conservation Act 1987 does include a general provision to interpret and administer legislation in such a way as to give effect to the principles of the Treaty of Waitangi. Since the GAC Act is listed in Schedule 1 of the Conservation Act as legislation administered by DOC, this requirement also applies here.
56. DOC has identified five Treaty partner groups whose rohe/takiwā or areas of interest overlap with the proposed sika HOSI area. Of these five groups, four have completed Treaty settlements, and one is currently engaged in Treaty settlement discussions with the Crown. These groups are:
 - Ngāti Tūwharetoa
 - Mana Ahuriri
 - Ngāti Hineuru
 - Tamatea Pokai Whenua
 - Mōkai Pātea Tono
57. We have already undertaken initial engagement with each of these groups to let them know that a HOSI process may be starting soon, and that we will likely be seeking to engage with them and get their views during such a process. This early contact has been appreciated by the Treaty Partners.
58. If you decide to initiate the statutory development phase, DOC proposes to engage with these Treaty partners in a similar manner to the statutory stakeholders named in the GAC Act. This means that we will provide them with information (via meetings and written material) about the proposal and the draft Herd Management Plan and seek their feedback.
59. It is our current understanding that Treaty Partners will likely be amenable to this approach provided due regard is taken of their input as befitting their primary relationship with the Crown.
60. DOC will also take all necessary steps to be compliant with provisions in existing Treaty Settlements and cooperation agreements with the relevant Treaty partner groups. We have not identified any provisions in these Settlements or cooperation agreements that would mandate a co-authorship approach for the HOSI management plan, and therefore we consider a consultative engagement approach to be most appropriate. We do not consider that anything less than a consultative engagement approach would be in line with our obligations under section 4 of the Conservation Act.

Consultation – Kōrero whakawhiti

61. No external consultation was undertaken in the preparation of this briefing.

Financial implications – Te hīraunga pūtea

62. DOC is resourcing the statutory development of a sika HOSI as a priority for delivery in the Hunting and Fishing portfolio.
63. Per the CNISF proposal, there will be an ongoing cost to DOC of around \$480,000 per annum to fund HOSI habitat monitoring and professional culling. In addition, DOC will need to be prepared to cover the CNISF funding portion in case they cannot produce the funds they indicate. Therefore, the ongoing cost DOC would need to budget for may be closer to the full \$823,000 - \$917,000 p/a.

Legal implications – Te hīraunga a ture

64. There are no particular legal implications associated with this briefing or the potential decision to begin the statutory process to develop a sika HOSI.

Next steps – Ngā tāwhaitanga

65. The table below provides indicative timeframes for the key steps in the HOSI development process.
66. DOC will provide you with regular updates on this work as it progresses. You have a regular meeting scheduled with DOC officials for 26 of March, providing an opportunity to discuss this process further, including the timing for potential announcements.
67. DOC will work with your office to support you announcing the initiation of the statutory development process, should you choose to do so.
68. We recommend you forward a copy of this briefing to the Minister of Conservation, as HOSI work intersects with his portfolio responsibilities.

<ul style="list-style-type: none">Development of draft Herd Management Plan in consultation with parties specified in GAC Act: MPI, GAC, Councils, NZCA, Cons. Boards. Other representative orgs. Treaty partners.	<ul style="list-style-type: none">April – July 2025
<ul style="list-style-type: none">Minister receives draft Herd Management Plan for commentOfficials adjust draft plan in line with Minister's feedback.MHF approves notification of draft HMP and associated material	<ul style="list-style-type: none">August/September 2025
<ul style="list-style-type: none">Public notification of Herd Management Plan	<ul style="list-style-type: none">October – November 2025
<ul style="list-style-type: none">Draft HMP revised based on submissions and follow up engagement (as required)	<ul style="list-style-type: none">December 2025 – March 2026
<ul style="list-style-type: none">Revised HMP and supporting material provided to MinisterMinister makes final decisions to make Gazette notice, designating HOSI	<ul style="list-style-type: none">April – May 2026
<ul style="list-style-type: none">HOSI operational	<ul style="list-style-type: none">June 2026

ENDS

CNISF proposed scope

1. The CNISF proposes the following scope for the HOSI:

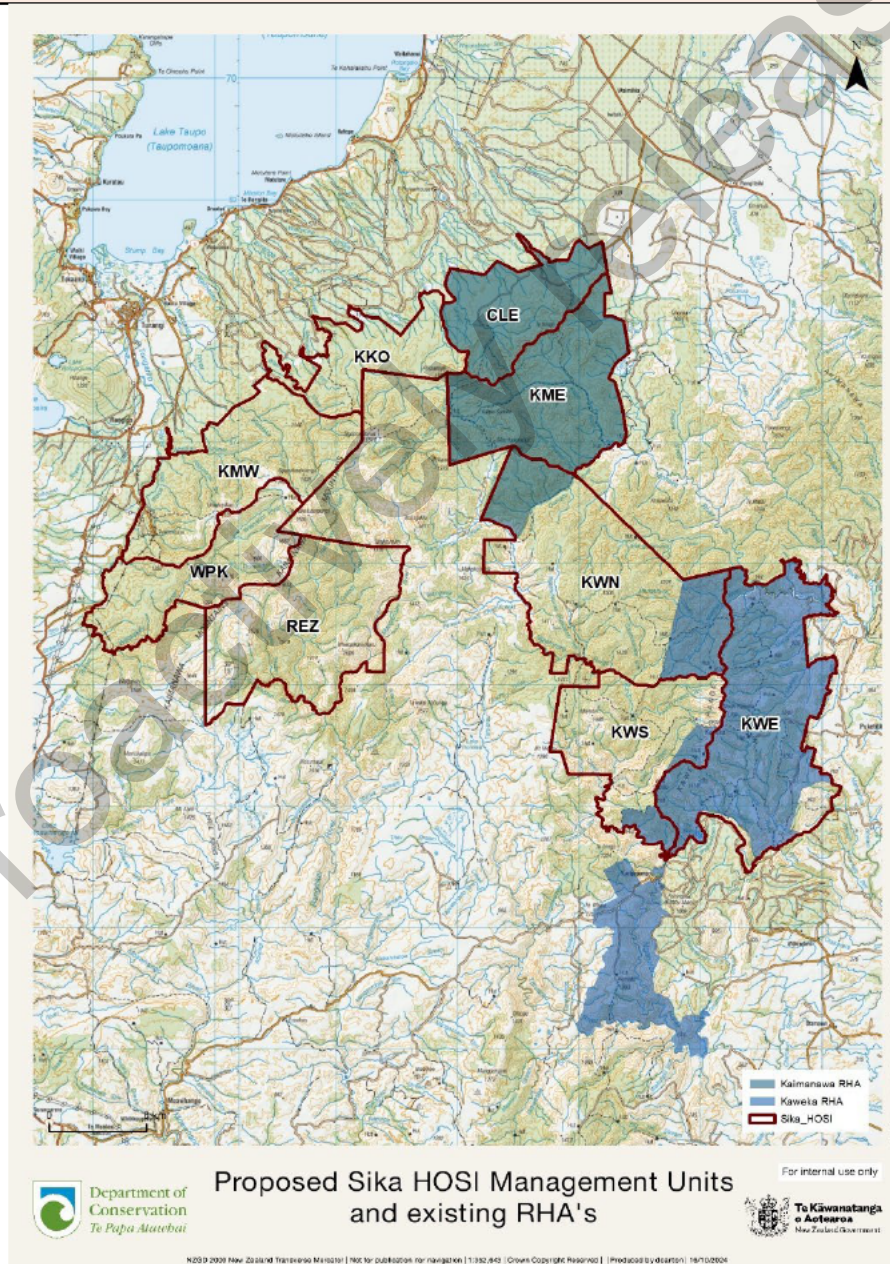
“Species of game animal:

- Sika (*Cervus nippon*)

Specified area of public conservation land

- Total recognised sika range on public conservation land (PCL): 273,900 ha.
- Total area proposed for Sika HOSI management: 125,634 ha.
- Percentage of sika range on PCL proposed for Sika HOSI management: 46%.

A Sika HOSI is proposed over nine MUs within Kaimanawa and Kaweka Forest Parks. Different MUs require different management approaches based on access, hunting pressure, harvest demographics, habitat type and the impact sika have in these habitats.”



DOC assessment of proposed scope

2. DOC considers the proposed scope (covering both the Kaimanawa and Kaweka Forest Parks) to be realistic. The proposed area is large enough to cover a good-sized herd, but the area is not too large to be effectively managed. Including both forest parks also provides sufficient size to provide meaningful ecological benefits. DOC believes the proposed management units are practical based on catchments and dividing ranges.
3. The Kaimanawa and Kaweka Forest Parks are classified and managed as conservation parks under the Conservation Act 1987, section 19. There are no provisions relating to conservation parks in the legislation that would hinder HOSI management on this type of land.
4. We note that the proposed HOSI excludes the Comet Range (Komata) in the south-eastern part of the Kaweka Forest Park. We consider this is a sensible approach since the Comet Range is disconnected from the rest of the park.
5. The North Island sika herd is centred on the two forest parks, but the feral range extends well beyond the parks onto surrounding private land. This means that the majority of the sika population (~84%) will be on adjacent private land, as HOSI can only cover public conservation land. Those animals outside of the HOSI area will remain classified as “wild animals”, subject to the Wild Animal Control Act.
6. The fact that the proposed sika HOSI area is surrounded by private land where sika deer are also present – including a large private hunting estate situated below and between the two forest parks – means that as the habitat improves in the HOSI area (due to increased culling) animals from adjacent properties will likely move into the HOSI area.
7. This in turn means that the HOSI managers (CNISF, GAC and DOC) will likely need to maintain higher levels of professional culling for longer - with associated long-term resourcing implications.
8. Adjacent landowners may see an increase in the quality of the animals on their land due to HOSI management, and this may increase the value and profitability of adjacent private hunting blocks. s9(2)(g)(i)

CNISF proposed management objectives

9. The CNISF proposes the following management objectives:

- “Ecological: Manage the Central North Island sika herd within the designated area to a level that is compatible with:
 - Overarching:
 - Positive seedling ratio indices (SRI) for canopy species, aiming to achieve +0.25% SRI.
 - Sustainable forest canopy regeneration (within 40 years of natural canopy collapse).
 - Localised:
 - Supporting the protection of biodiversity values in the Northwest Kaimanawa (Waiotaka and Whitiakau catchments); Northwest Kaweka Forest Park (Mangatainoka/Makino); and where localised biodiversity values exist (e.g. land snails).
- Hunting: Manage the Central North Island sika herd within the designated area in a way that:
 - Overarching:

- Enhances or maintains hunter participation and contributions to sika population management.
- Enhances or maintains hunter satisfaction with sika venison quality and the overall sika hunting experience.
- Localised:
 - Facilitates and optimises hunter access.
- Collaboration: Manage the Central North Island sika herd within the designated area in a way that:
 - Overarching:
 - Provides hunters, iwi, stakeholders and interested parties' opportunities to actively contribute to and participate in the management of the sika herd.
 - Localised:
 - Enables representatives of organisations whose object is to foster hunting or shooting in recreational hunting areas to provide advice on the management of the Kaimanawa and Kaweka RHA."

DOC assessment of proposed management objectives

10. DOC considers the proposed management objectives to be broadly appropriate, but that the targets and measures will need some further refinement to ensure they enable progression towards the ecological outcomes, (e.g., by including sapling targets alongside seedling ration targets).
11. In some areas Sika are currently overpopulated and at the carrying capacity of the forests in the area. Many deer are surviving on leaf litter due to the scarcity of any palatable plant species within browsing reach. This includes mountain beech (*Fuscopora cliffortioides*), the predominant canopy species in large parts of both forest parks.
12. Mountain beech is prone to mass die off events due to generally being of a similar age class. The lack of seedlings and saplings to replace the canopy over time results in the forest converting to low scrubland. This occurred in the 1990s in the Kawekas and was largely arrested by the DOC-led Kaweka Mountain Beech project 1997-2016. A similar mass die-off event is currently occurring in the Waipakihi catchment of the Kaimanawa Forest Park.
13. The Kaweka Mountain Park project used aerial deer control to reduce sika numbers to allow enough mountain beech saplings to grow above browse height. These will over time then reform the canopy layer.
14. The CNISF HOSI proposal intends to utilise this same methodology. As it is the same methodology DOC have employed in the past, we consider this to be appropriate.
15. Further information on the Kaweka Mountain Beech Project can be found at www.doc.govt.nz/parks-and-recreation/things-to-do/hunting/where-to-hunt/hawkes-bay/hawkes-bay-hunting/sika-deer-hunting-in-kaweka-forest-park/

CNISF proposed management strategies/methods

16. The CNISF proposes the following management strategies/methods

- "Sika HOSI objectives are to be achieved by applying the following management strategy principles:
 - Advance science-informed adaptive management of the sika herd through:

- Habitat and herd health indicator monitoring systems.
- Analysing management inputs, outputs, and outcomes.
- Maintain appropriate sika harvest levels through:
 - Coordination of sika hunting activities.
 - Hunter participation and satisfaction.
- Applying professional population management intervention where required.
- Create opportunities for hunters, iwi, and interested parties' to actively contribute to and participate in the management of the sika herd.
- Provide information and education on the sika herd and its management to hunters and the wider community.
- Support wider conservation outcomes such as protecting threatened species through predator management, survey and monitoring.
- Sika HOSI proposed objectives and strategies are anticipated to remain unchanged for the term of the Sika HOSI HMP and may only be amended following HMP review and amendment processes. The applications, measurables and management responses form operational planning are anticipated to be adjusted as more information and data is collected, based on adaptive management principles."

DOC assessment of proposed management strategies/methods

17. DOC considers the proposed management strategies and methods to be appropriate, but we would emphasise that due to the current overpopulation of sika deer in some management units, the professional culling of the population has to be the focus of the first stage of operations before any longer-term management of the herd quality can occur. The duration of these operations will need to be determined by the improvement of vegetation shown through monitoring and may be longer than what's initially proposed.
18. With funding from DOC, the CNISF is already undertaking this type of professional aerial control work in the Remote Experience Zone of the Kaimanawa Forest Park, where they have removed over 1,000 deer in the last three years.
19. Coordination of voluntary sika hunting activities can be a useful tool to get hunters into areas to see the impacts of deer overpopulation first hand and become advocates for something needing to be done to address the issue. These hunts however make limited contribution to population management.

Fees and levies

20. The CNISF proposes to have no general fees for hunting sika that is part of the Sika HOSI in the first five-year period, but add that fees may be considered for subsequent Sika HOSI management cycles as part of cost recovery options.
21. **DOC agrees that it would be inadvisable to introduce fees** for sika HOSI hunting in the first five years of operations. After the first five-year period (if the herd quality has improved sufficiently) there may be a case for introducing a fee to contribute to cost recovery, and we would recommend making a new assessment when the herd management plan is reviewed at the end of the five-year period.

22. s9(2)(g)(i)

23. Regardless, DOC considers it very unlikely that fees could contribute significantly to cost recovery. This is because the fees would need to be set low enough not to discourage hunters. Since there hasn't been a HOSI before, we can't estimate the price elasticity with any certainty, but because we know that there are private hunting blocks nearby where sika may be hunted (and there are plenty of fee-free hunting opportunities elsewhere on public conservation land) we consider it likely that the fees would need to be set fairly low not to discourage people.
24. It is unclear how many hunters will be interested in hunting sika HOSI animals, but we note that DOC issues between 5000 and 8000 hunting permits for the two parks (Kaimanawa and Kaweka) every year. These numbers don't necessarily translate to individual hunters, as hunters often apply for more than one permit in a year and / or apply for permits across large areas of public conservation land regardless of where they actually hunt.
25. Assuming around 5000 sika hunters per year (noting this estimate is very uncertain) the fee would need to be around \$165 per person to fully cover HOSI management costs. Such a high fee would likely have a significant dampening effect on demand and would therefore be unlikely to collect the full amount.
26. If the fee was instead set at \$30 (comparable to other hunting permit fees), this could raise \$150,000 – though a portion of that would have to go to administering and enforcing the fee system. A \$30 fee could have somewhat of a dampening effect on demand, but it is unclear how significant this would be.
27. DOC would not recommend introducing even this relatively low fee until such time that the sika herd has improved enough in quality to attract steady demand from hunters.