



Briefing: Wapiti Herd of Special Interest (HOSI) proposal

To	Minister for Hunting and Fishing	Date submitted	3 May 2025
Action sought	Agree to initiate Game Animal Council Act statutory process to develop a Herd of Special Interest (HOSI) for wapiti deer in Fiordland National Park.	Priority	Normal
Reference	25-B-0190	DocCM	DOC-10283956
Security Level	In Confidence		
Risk Assessment	Medium There will be interest from hunting and conservation stakeholders around initiating a wapiti HOSI development process. Some may view developments negatively, particularly in view of section 4(2)(b) of the National Parks Act 1980 which states that introduced animals shall as far as possible be exterminated.	Timeframe	9 May 2025
Attachments	Appendix A – DOC commentary on wapiti HOSI proposal		
Contacts			
Name and position			Phone
Stephanie Rowe, Deputy Director-General, Biodiversity, Heritage & Visitors			s.9(2)(a)
Ben Reddiex, Director National Programmes			

Executive summary – Whakarāpopoto ā kaiwhakahaere

1. You recently received a proposal for a herd of special interest (HOSI) from the Fiordland Wapiti Foundation (FWF) on 28 March 2025. This briefing provides the Department of Conservation's (DOC) summary and evaluation of the proposal and seeks your decision to initiate the statutory development process to develop a wapiti HOSI.
2. The FWF proposal is for a HOSI managing Fiordland wapiti deer in an area spanning 190,700 ha, roughly 15% of the Fiordland National Park (FNP), bordered by the Tasman Sea to the West, Lake Te Anau to the East and FNP to the North and South.
3. FNP is part of Te Wahipounamu – South West New Zealand which is listed as a World Heritage Area (WHA) under UNESCO – the United Nations Educational, Scientific and Cultural Organization. All properties inscribed on the World Heritage List must have adequate long-term legislative, regulatory, institutional and/or traditional protection and management to ensure their safeguarding.
4. The management objectives in the FWF proposal are to reduce animal numbers down to a level that makes for a sustainable, high-quality hunting resource and ensures that the forest and alpine vegetation can regenerate and be maintained. DOC considers that HOSI management, with appropriate targets and resourcing, could maintain, safeguard and/or improve both habitat and animal health. This is consistent with the objectives set out in the Fiordland National Park Management Plan 2007 around reduction and control of introduced animals.
5. DOC considers that the FWF proposal serves as a reasonable basis for developing a wapiti HOSI and notes it is based on activities currently being undertaken as part of a community agreement between DOC and FWF.
6. The HOSI process may receive media attention, both positive and negative, in part due to stakeholders' various views regarding HOSI in general. We consider this risk can be mitigated through appropriate engagement and clear communication and messaging.
7. In March 2024, Forest & Bird filed an application for judicial review of the legality of the community agreement between the Director-General of DOC and FWF. The proceeding has been paused to enable the parties to explore settlement. A key distinguishing factor between management as part of a HOSI designation under the Game Animal Council Act 2013 (the GAC Act), and the existing management of wapiti under a community agreement, is the explicit mention of animals being managed for hunting purposes in section 16 of the GAC Act.
8. We recommend that you agree to initiate the HOSI statutory development process. However, we note that there are matters that will need to be addressed during this process, including the formulation of appropriate conservation targets and monitoring methods and scope, ensuring a practical management structure and delegation of management powers, and clarifying how section 4(2)(b) of the National Parks Act 1980 applies to the management of deer species in FNP.
9. Your proposed legislative reform of the Game Animal Council Act seeks to clarify how section 4(2)(b) of the National Parks Act 1980 would apply to a HOSI designated under the GAC Act. Any announcement to formally proceed to the statutory development phase for the proposed HOSI should complement any announcements you wish to make concerning your legislative reform. We are providing advice on this separately.
10. HOSI would have financial implications for DOC. Of the \$457,000 estimated cost for HOSI management and monitoring in the proposal, the FWF proposes that DOC fund vegetation monitoring (around \$40,000 per annum). We consider that these monitoring

costs are likely to be higher. Final costs would be determined once the monitoring program has been confirmed. The deer removal operation costs are also likely to be higher than estimated. There is an expectation from FWF that the Crown also fund associated compliance, review, statutory, management and reporting processes and systems. While the overall costs appear reasonable, these matters represent areas for discussion and development during the statutory development process.

11. DOC considers we will be able to fund HOSI operation costs proposed to be covered by DOC, via internal reprioritisation. The full financial implications for the Crown are likely to be higher and would need to be confirmed as part of the statutory process. We will provide you with further advice on any expected costs to the Crown, including options for funding these.
12. The proposed HOSI area lies within the rohe/takiwā of Ngāi Tahu, with Ōraka-Aparima the relevant Papatipu Rūnaka. We propose to engage with these groups on a consultative basis, similar to the engagement with statutory stakeholders named in the GAC Act.
13. If you agree to initiate the HOSI development, 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.
14. DOC considers the statutory development stage is the appropriate time to work through issues and we recommend that you agree to progress to this stage.
15. Initiating development of a HOSI does not commit the Government to designating the HOSI. If you are not satisfied with the draft HMP that is produced, you can decline to progress it to public notification. You also retain the option to pause the process after public notification.

We recommend that you ... (Ngā tohutohu)

		Decision
1.	Note that you have received a proposal for a Herd of Special Interest from the Fiordland Wapiti Foundation.	Noted
2.	Agree to initiate the Game Animal Council Act 2013 process to develop a Herd of Special Interest for wapiti deer in Fiordland National Park.	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 of Conservation for his 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
6.	Note that at an appropriate stage of the process, DOC will advise Forest & Bird that you have initiated a HOSI process for Wapiti, given the current legal proceedings that have been brought by Forest & Bird.	Noted



Date: 02/05/2025

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 Fiordland Wapiti Foundation's (FWF) 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 28 March 2025, you received a proposal for a HOSI for Fiordland wapiti deer (*Cervus canadensis* x *C. elaphus*, herein after 'wapiti') from the FWF. Development of the proposal was supported by the Game Animal Council (GAC), with the Department of Conservation (DOC) providing high level feedback to the GAC and FWF during this process. The herd in question is currently being managed under a community agreement between DOC and FWF.
3. A HOSI is an instrument provided for under section 16 the Game Animal Council Act 2013 (GAC Act) that enables a herd of game animals in a specified area on public conservation land (PCL) to be managed by the Minister for Hunting and Fishing (or, by delegation, the GAC/DOC) for hunting purposes where this is consistent with conservation outcomes.
4. The Royal Forest and Bird Protection Society of New Zealand Inc. (Forest & Bird) considers the current management outlined in the community agreement between DOC and the FWF is unlawful. They view it as inconsistent with the National Parks Act 1980, the General Policy for National Parks, the Southland Conservation Management Strategy, and the Fiordland National Park Management Plan. In March 2024, Forest & Bird sought judicial review of the Director-General's decision to enter into the community agreement with FWF. The parties have since asked the High Court to temporarily adjourn the proceeding. The proceeding has now been stayed to allow the parties to negotiate a solution. Part of that solution may ultimately be to manage wapiti under the GAC Act, by designating a HOSI.
5. The next step in the HOSI process is for you as the Minister to determine whether to initiate the formal statutory development phase based on the 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 May – 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.
6. A more detailed overview of the anticipated timeline for the overall HOSI designation and HMP development can be found in Table 1 (page 15 in this briefing). It is expected that any statutory process for the designation of a wapiti HOSI would align with the same process currently underway for the designation of sika HOSI.
7. This briefing provides DOC's assessment of the FWF proposal, including identification of key issues that we consider will need to be addressed during the statutory development phase (this is stage 2 in Figure 1 below).

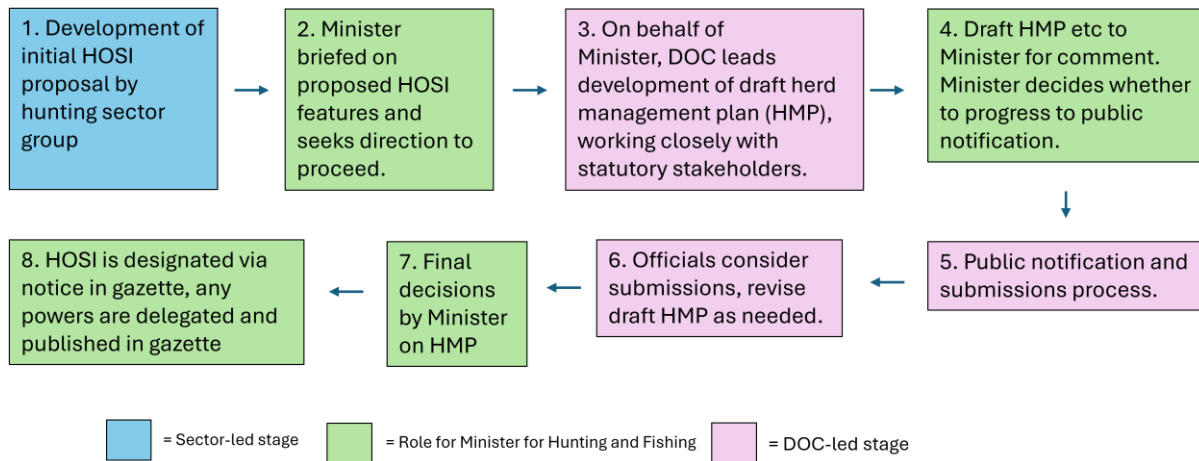


Figure 1. Stages of HOSI development process

Fiordland wapiti deer and the FWF

8. Wapiti, or elk, were once found throughout much of the Northern Hemisphere. Today, their native range is restricted to Canada and the Western United States of America.
9. Wapiti were gifted to New Zealand in 1905 by United States President Theodore Roosevelt. The wapiti in Fiordland National Park represent one of the few truly wild wapiti herds outside their native range.
10. The Fiordland wapiti deer herd holds historical significance in New Zealand, through early trophy notoriety, commercial exploitation, and genetic management and research, with numerous books documenting these phases of wapiti history.
11. Wapiti hunting in Fiordland has become a key draw for domestic and international hunters alike, particularly during the bugle (the wapiti ‘roar’ period).
12. The FWF is a charitable trust. It was established in 1993 and has been managing the Fiordland wapiti herd and biodiversity in the Wapiti Area in the Fiordland National Park (FNP). Their vision is “to protect Fiordland using sound deer management”. FWF has been undertaking wild animal control activities in FNP since the 2005/2006 financial year. They are currently managing the Fiordland wapiti herd under a community agreement with DOC.
13. Every year, FWF runs a Wapiti Ballot for the bugle period, currently providing 600 recreational hunters the opportunity to hunt wapiti bulls during the bugle. Ballot applications for this period can be about five times this number.

Summary and assessment of wapiti HOSI proposal

14. Below is a high-level summary of the key elements of the FWF proposal as well as a high-level summary of DOC’s assessment of these elements. A more detailed discussion is provided in Appendix A.

FWF proposed scope

15. The FWF proposal is for a wapiti deer HOSI to be designated in an area of FNP. The total area of PCL proposed to be covered by HOSI management activities is 190,700 ha (inclusive of lakes and other water bodies), of which 123,800 ha forms the Glaisnock Wilderness area. This proposed scope would cover roughly 15% of FNP.
16. DOC considers the proposed scope of the wapiti HOSI to be realistic (in terms of management capability for the FWF, DOC, and GAC), and that the proposed management units are practical, based on experiences to-date managing wapiti in FNP under an existing community agreement between DOC and FWF.

17. A key issue to work through during the development phase will be the management implications of having both forested and alpine habitats present in the proposed HOSI area. This will result in better outcomes for both the herd and biodiversity in the wapiti area but will result in increased management effort compared to managing deer only in open alpine areas where aerial control can be relatively easily undertaken.

FWF proposed management objectives

18. The main HOSI management objectives proposed by the FWF are for the Fiordland wapiti herd to be managed within the designated area:
- to a level that is compatible with promoting the regeneration of browsed indigenous flora;
 - in a way that achieves the ecological objectives, generates desired trophy quality, maximises hunting opportunities and enhances hunter satisfaction, encourages recreational harvest that supports the herds genetic and trophy integrity, and supports the viability of commercial deer recovery; and
 - in a way that builds strong partnerships with aligned businesses and other organisations, supports the maintenance or increases in non-government funding streams, and provides opportunities for others to contribute to management.
19. DOC considers these management objectives to be reasonable, but strategies to achieve them will require some refinement (e.g., how to intensify deer control and monitoring to inform ongoing management in forested areas) during the development process to ensure these objectives can be met.
20. Under the proposed HOSI management approach, with appropriate targets and resourcing, we anticipate an increase in the regeneration of browsed indigenous flora. We also anticipate the approach will reduce or maintain existing levels of food competition among the wapiti with a corresponding increase or maintenance in the quality of the animals (antlers, hides and meat).
21. Meeting regeneration objectives will require continued and adaptive management of deer numbers, which is informed by monitoring of both the forest and alpine environments.
22. Currently, the forest monitoring method used to evaluate regeneration of deer preferred browse species, the seedling ratio index (SRI), appears to be negative across most sites sampled since 2010. Seedling ratios can range between -1 and 1. A negative SRI for a palatable species suggests poor regeneration due to browsing, while a positive ratio suggests regeneration is possible. The stated management aim by year 10 of the program in the proposal is to achieve an SRI for deer preferred species of >0. This will require a reduction in deer numbers in forested areas.
23. Separately, in the alpine areas the proposal is to monitor browse levels on three alpine indicator species, known to be susceptible to deer browse and which are present at all monitoring sites. The proposal is for browse levels by year 10 of the program to be reduced to below a target of 10% across much of the wapiti area. Data on the regeneration of browsed indigenous species in alpine areas is limited under the current monitoring method.
24. Over time, the proposed management objectives may also result in wapiti bulls with larger antlers. This has the potential to attract a greater number of hunters to the proposed area. Greater levels of competition between hunters seeking access to a finite area and resource may increase the risk of poaching. Any possible competition among hunters or between hunters and other users of the wapiti area will need to be monitored, and any conflict managed. Compliance activities may be necessary to discourage and prevent poaching.

25. Deer numbers may need to be reduced compared to current levels to meet the proposed ecological targets. There is a risk that reducing deer numbers too much may detract from the hunting experience. A knock-on effect of this may be that hunters avoid the proposed area, in favour of areas with greater deer numbers. This may lead to a drop in revenue for FWF from the Wapiti Ballot, which may have implications for the level of management that can be undertaken.
26. It will be important to seek a sustainable balance between the levels of management activities, deer numbers, and the hunting experience. The statutory development process can be used to further test stakeholder views around these issues and identify what balance may be possible.
27. **DOC considers the proposed management objectives to be both positive and reasonable** based on experiences under the current community agreement between DOC and FWF. While there will be costs to the Crown associated with the proposed HOSI designation, these appear to be less than if the Crown were to undertake wild animal management activities independently of the proposed HOSI management activities. The maintenance or increases in non-government funding streams compared to the current management arrangements in the proposed area will enable DOC to continue to focus its remaining wild animal management resources on other areas of FNP and public conservation land more broadly.

FWF proposed management strategies

28. The main strategies proposed to achieve these outcomes are:
 - establish and implement a practically functional and efficient management structure and administrative systems (proposed to be FWF-led);
 - deliver sustained positive conservation outcomes in the wapiti area and surrounds through adaptive annual harvest/deer removal targets (proposed to be FWF-led), informed by monitoring data (proposed to be DOC-led);
 - provide recreational hunters with continued access to quality wapiti hunting experiences through the balloting of hunting opportunities for the wapiti bugling season, and continued selective harvesting/culling of deer (particularly females and deer with no/weaker wapiti traits) to maintain a sex ratio of 1.1 males per female (proposed to be FWF-led); as well as
 - actively contribute to the maintenance of commercial deer hunting expertise and capability (proposed to be FWF-led).
29. **DOC considers the proposed management strategies to be reasonable** based on experiences to-date under the community agreement between DOC and FWF. During the statutory development process, clarity will need to be sought as to the appropriate organisational structures and authorisations that might allow for some of the proposed management activities to be led by FWF.
30. DOC notes that deer management is more challenging within forested areas in general, particularly the dense forests of FNP (approx. 70% of total proposed HOSI area). Monitoring may need to be adjusted to provide more nuanced data to inform adaptive management and target setting. This will need to be factored in as part of the HMP. The strategy for targeted deer harvesting/removal, including possible concessions for the meat recovery component, will need to be determined as part of the statutory development process.
31. Adaptive management of the wapiti herd within a HOSI, with appropriate monitoring, will increase our understanding of the management settings required to ensure forest and alpine environment health is maintained and/or improved long term.

FWF proposed organisational structure

32. The FWF proposes an organisational/management structure where the GAC, DOC and the FWF all have key roles and responsibilities (outlined below). It should be noted that these constitute proposals from FWF. They are not intended to pre-empt any possible delegation of Ministerial powers under the GAC Act.
- all the operational activities deriving from the Minister's HOSI management powers (i.e., authorising management operations, issuing HOSI hunting permits) that are delegated to the GAC, are exercised by both the GAC and FWF through an agreement between the two
 - the GAC develop and maintain hunting authorisation, reporting and data management systems for FWF use
 - the GAC provide information and education to the hunting sector to support FWF wapiti HOSI management, including in information and education provision to wapiti HOSI hunters
 - the GAC undertake game animal management-based research and system improvements and outcomes to support FWF wapiti HOSI management
 - the GAC assess costs of managing wapiti HOSI and options for cost recovery
 - DOC administers the GAC Act, provides regulatory oversight as required, and appoints enforcement officers
 - DOC leads the design and implementation of vegetation monitoring, and undertakes conservation-based research and system improvements and outcomes
 - the FWF lead and deliver operational wapiti HOSI management functions in accordance with the HMP
 - the FWF collect and report hunter and harvest data, and report operational management activities.
33. The FWF proposal notes that regular meetings occur between the DOC Te Anau District and the Kaitiaki Roopu collective, in particular with the Ōraka-Aparima Rūnaka. These are on a range of issues relating to FNP, with the management of the Fiordland wapiti area by FWF being a topic for regular updates.
34. The FWF proposal also notes the FWF is open to working more with mana whenua to recognise their interests regarding wapiti HOSI management.
35. The GAC Act only allows for statutory HOSI management powers to be exercised by the GAC or the Minister (i.e. via 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., deer control, herd monitoring, coordination of voluntary management hunts, ballot management, education and outreach). This means, for instance, that the FWF could potentially be engaged to perform these functions.
36. **DOC considers the proposed organisational structure to be broadly practical.** However, 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 ecological 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 Ministerial powers delegated to it under section 18 of the GAC Act. These issues will need to be worked through during the statutory development phase.
37. Clarity will also need to be sought as to how the GAC Act functions that FWF proposes to undertake could be enabled in practice. Any new functions will need to align with the necessary authorisations provided for under the relevant pieces of legislation.

38. DOC has a good working relationship with the FWF, including as part of the existing community agreement between the two entities.

FWF Proposed funding structure

39. The FWF estimates the annual operational cost of the proposed HOSI to be approximately \$417,000, of which \$200,000 is proposed to be cost recovered through Wild Animal Recovery Operations (WARO) coordinated by FWF. This is informed by existing WARO activities that FWF is coordinating. In addition, the FWF proposes that the Crown (via DOC) fund approximately \$40,000 per annum for vegetation monitoring. The remainder (\$217,000) would be funded by the FWF, primarily through the annual Wapiti Ballot, sponsorship, fundraising, deer recovery and in-kind contributions of voluntary labour and professional expertise. This proposed funding structure is like what FWF has in place at present. This includes the charging of a fee for hunters who enter the wapiti bugle ballot.
40. Outside of the annual operational cost of the proposed HOSI, a further \$70,750 in voluntary in-kind contributions, \$70,000 for predator trapping and back country facility maintenance, and \$10,000 towards Murchison Mountains deer control (outside of the proposed area for HOSI designation) are proposed to be funded through FWF.
41. Based on the costs budgeted in the proposal, the FWF has sufficient reserves to underwrite the first two of the five years of proposed wapiti HOSI management as part of a risk management strategy.
42. The table below shows the high-level FWF proposed annual funding structure:

Contributions*	Activity	Total \$
FWF		
	Operations staff resourcing	150,000
	Herd health and status monitoring methods	2,000
	Aerial deer removal and status monitoring methods	250,000
	WARO cost recovery**	(200,000)
	Ongoing stakeholder engagement, information sharing, education, and FWF reporting	10,000
	Partnership management and funding acquisitions	5,000
Total HOSI only		217,000
	FWF predator trapping and back country facility maintenance	70,000
	Contributions to Murchison Mountains deer control (outside of the proposed area for HOSI designation)	10,000
Total additional contributions only (not critical to actual herd management)		80,000
	Voluntary expertise ~100 hours (\$120 per hour)	12,000
	2,500 non-expert volunteer hours^ (hourly minimum wage)	58,750
Total overall FWF contributions		367,750
Crown		
	Vegetation Monitoring	40,000
Total overall costs (FWF and Crown combined)		407,750
TBD#	Underwriting (excludes cost recovered through WARO)	217,000

** This budget forecast does not include any potential administrative costs incurred by the GAC or DOC in performing their roles and responsibilities for Wapiti HOSI management.*

*** WARO is a cost neutral deer management contribution of ~80% of current annual deer removal targets.*

TBD- To be determined. The FWF has sufficient reserves to underwrite the first two years of proposed Wapiti HOSI management as a risk mitigation strategy.

^ Currently, an estimated 2,600 hours of volunteer support are provided to the FWF to support its activities.

43. **DOC considers the estimated cost to run the HOSI to be realistic but likely higher than outlined.** The costs associated with aerial deer removal and herd status monitoring methods (\$250,000 from FWF) are likely to be higher, possibly up to \$500,000. Vegetation monitoring (\$40,000 from Crown) is also likely to be higher, pending confirmation of the monitoring methods and scope. These higher figures are also due to the likely intensification of deer control required below the bush line, and the need to still confirm the monitoring program that will be put in place, pending a formal review of the existing program. The final costs will be informed by the further discussions and developments during the statutory development process.
44. DOC considers the proposal for FWF to underwrite the first two of the five years of proposed wapiti HOSI management will reduce the operational risks associated with HOSI designation. The final costs stemming from the statutory development process will inform whether this is sufficient to cover two years of management activities and/or whether further underwriting is required to cover years three to five. It is expected that any remaining underwriting costs would need to be covered by the Crown.
45. DOC officials have determined that DOC will be able to fund the currently estimated Crown portion of the wapiti HOSI funding via internal reprioritisation (i.e. \$40,000). However, there are likely to be additional costs to the Crown associated with increased vegetation monitoring and regulatory monitoring and compliance. The implications of this would need to be scoped once the full amount is confirmed.

DOC recommends progressing with work on a wapiti HOSI

46. DOC considers the FWF proposal provides a reasonable starting point for the development of a wapiti HOSI, building on the existing activities being undertaken by FWF under the community agreement with DOC.
47. 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.
48. If you agree to progress the wapiti 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 FWF). 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., Environment Southland)
 - the New Zealand Conservation Authority
 - any relevant conservation board (i.e., Southland Conservation Board)

49. In addition, we will consult with the Treaty partner groups whose rohe/takiwā or areas of interest overlap with the proposed wapiti HOSI area (cf. paragraphs 65-71 below)
50. Other non-statutory stakeholders will be consulted. This will include those who may be directly impacted by the designation of a HOSI, such as the UNESCO World Heritage Committee, as well as those who may have an interest but who will not be directly impacted. The level of consultation and engagement will be informed by the perceived level of interest and impact on each stakeholder.
51. The final design of the wapiti HOSI may not look exactly like the FWF proposal, as this will be refined via consultation with stakeholders and Treaty partners during the statutory process – but we do not expect major changes to scale, scope and organisational structure.
52. 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 FWF proposal provides a good basis for development of a wapiti HOSI that will be compatible with the overriding considerations.
53. 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:
 - 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.
 - How the GAC Act functions that FWF proposes to lead intersect with what can be authorised under other relevant pieces of legislation.
 - Treaty partner views around HOSI management, and their aspirations for HOSI objectives, strategies and outcomes; there are Treaty partner groups with interest across the proposed HOSI area. It will be important to plan and provide sufficient advance-notification and lead-in time to allow them to adequately engage in this process within our desired timeframes.
 - Clarification on how section 4(2)(b) of the National Parks Act 1980 regarding the extermination as far as possible of introduced animals would apply to a HOSI designated under the GAC Act.
 - Agreement on scope, scale and targets for ecological monitoring.
54. DOC considers the statutory development stage is the appropriate time to work through these issues and anticipate that they can be addressed during that phase.

Risk assessment – Aronga tūraru

55. There is a risk that the HOSI development process receives media attention, especially considering the judicial review of the Director-General’s decision to enter into the community agreement with FWF. The level of media attention may increase should Cabinet paper cf. 25-B-0156 be approved. The impacts of increased media attention can be mitigated through careful communication and outreach planning, including clear messaging around the process and merits of HOSI designation compared to other management options. We are developing a communications plan to address these risks.
56. There is a risk that some stakeholders may view the HOSI designation process as being inconsistent with the requirements that need to be met for any World Heritage site to remain inscribed under UNESCO. This could include a challenge by a Party to UNESCO, via their World Heritage Committee. FNP currently has long-term legislative, regulatory, institutional and/or traditional protection and management. The activities of

FWF at present, and any eventual HOSI management activities would need to fit within these.

57. From a management perspective, the risks are limited given the experiences to-date with management of the wapiti herd under the community agreement between DOC and FWF. However, clarity will need to be sought as to how the GAC Act functions that FWF proposes to lead intersect with other legislation. This would need to be explored as part of the statutory development process.
58. Initiating this process does not commit the Government to a wapiti HOSI. You retain the option to decline to approve the final HOSI design that is produced via this process.
59. Note, however, that if you announce the start of the process to develop a wapiti 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.
60. Around the development process, there is a 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.
61. There is a risk that Treaty partners may have limited availability to engage during the statutory development process due to other competing priorities. DOC will manage 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.
62. s9(2)(g)(i)
[REDACTED]
[REDACTED]
[REDACTED]
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[REDACTED]
[REDACTED]
63. There is a risk that some conservation stakeholders will view negatively the start of work to designate a wapiti HOSI because they may be opposed to HOSI in general or because they view it as not meeting the requirements of section 4(2)(b) of the National Parks Act 1980. 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 and recovery of alpine vegetation), the successes to-date of wapiti management under the current community agreement, and other work to clarify how section 4(2)(b) applies to a HOSI (Cabinet paper cf. 25-B-0156).
64. If you do not agree to initiate the statutory process to develop a wapiti HOSI now, there is a risk that a wapiti HOSI will not be delivered before the end of the term. This would likely be viewed negatively by the hunting community.

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

65. The GAC Act includes requirements to engage with certain named statutory stakeholders (cf. paragraph 48 above) but does not include provisions around engaging with Treaty partners.
66. However, section 4 of the Conservation Act 1987 includes 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.

67. DOC has identified two Treaty partner groups whose rohe/takiwā or areas of interest overlap with the proposed wapiti HOSI area. Of these two groups, one has completed Treaty settlements, while the other is part of the same broader settlement. These groups are:
- Ngāi Tahu
 - Ōraka-Aparima Rūnaka
68. DOC will be undertaking initial engagement with each of these groups to let them know when any HOSI process may be starting, and that we would be seeking to engage with them and get their views during such a process. We understand that representatives from FWF have also provided Treaty partners with high-level information around the possibility of a wapiti HOSI designation.
69. 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. We consider the proposed approach meets our obligations under section 4 of the Conservation Act, while meeting the statutory timeframes for delivery.
70. 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.
71. DOC will also take all necessary steps to be compliant with provisions in existing Treaty Settlement and any cooperation agreements with the relevant Treaty partner groups. We have not identified any provisions in the Settlement 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

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

Financial implications – Te hīraunga pūtea

73. DOC is resourcing the statutory development of a wapiti HOSI as a priority for delivery in the Hunting and Fishing portfolio.
74. Per the FWF proposal, there will be an estimated ongoing cost to DOC of \$40,000 per annum to fund HOSI vegetation monitoring. This figure is likely to be higher. In addition, DOC would need to provide regulatory oversight as required and appoint enforcement officers. The full financial implications would need to be confirmed as part of the statutory process. We will provide you with further advice on any expected costs to the Crown, including options for funding these (e.g., new funding, a reprioritisation of existing funds or re-scoping of the HOSI designation).

Legal implications – Te hīraunga a ture

75. s.9(2)(h) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

76. Next steps – Ngā tāwhaitanga

77. The table below provides indicative timeframes for the key steps in the HOSI development process. DOC would provide you with regular updates on this work as it progressed.
78. DOC will work with your office to support you announcing the initiation of the statutory development process, should you choose to do so, drawing on the experiences with the announcement made for initiation of the statutory development process for the sika HOSI.
79. We recommend you forward a copy of this briefing to the Minister of Conservation, as HOSI work intersects with his portfolio responsibilities.

Table 1. Timeline and key steps for statutory development phase of the proposed HOSI

<ul style="list-style-type: none"> ○ Development of draft HMP in consultation with parties specified in GAC Act: MPI, GAC, Councils, NZCA, Conservation Boards, Treaty partners, and other representative organisations. 	<ul style="list-style-type: none"> ○ May – August 2025
<ul style="list-style-type: none"> ○ Minister receives draft HMP for comment ○ Officials adjust draft plan in line with Minister's feedback ○ Minister approves notification of draft HMP and associated material 	<ul style="list-style-type: none"> ○ September – October 2025
<ul style="list-style-type: none"> ○ Public notification of HMP 	<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 Minister ○ Minister makes final decisions to make Gazette notice, designating HOSI 	<ul style="list-style-type: none"> ○ April – June 2026
<ul style="list-style-type: none"> ○ HOSI operational 	<ul style="list-style-type: none"> ○ July 2026

Appendix A – DOC commentary on wapiti HOSI proposal

FWF proposed scope

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

Proposed HOSI Species

Fiordland Wapiti (*Cervus canadensis* x *C. elaphus*).

Other game species present

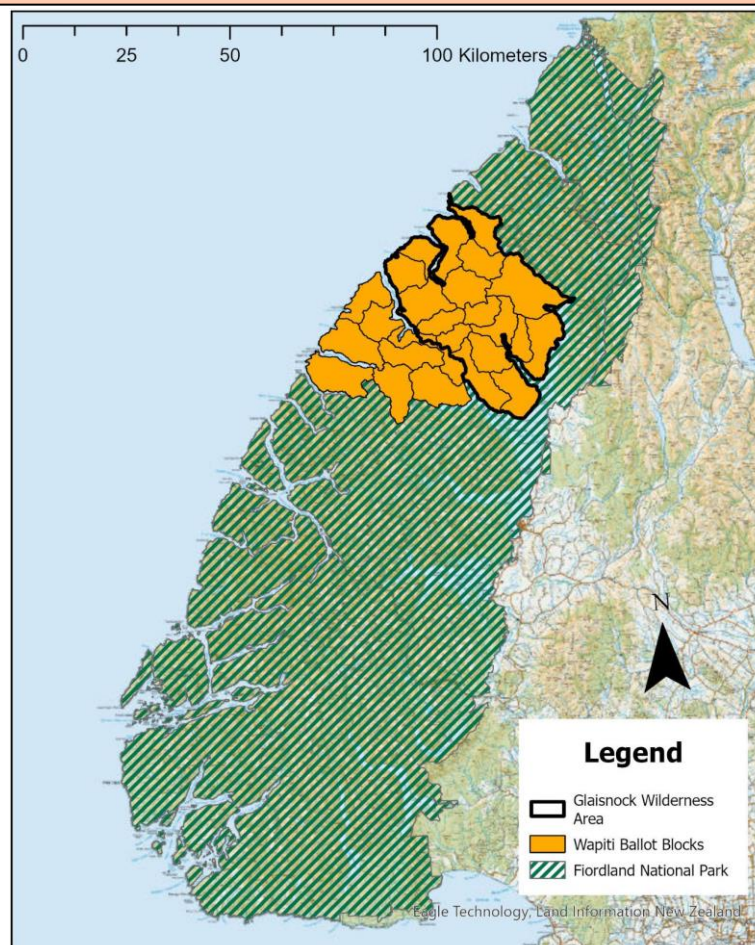
Red deer (*Cervus elaphus*)

Chamois (*Rupicapra rupicapra*)

Specified area of public conservation land

Total area proposed for Wapiti HOSI management: 190,700 ha (inclusive of lakes and other water bodies) within Fiordland National Park (i.e., 15% of total Park area), composed of:

- Glaisnock Wilderness area: 123,800 ha
- Fiordland National Park only: 66,900 ha



DOC assessment of proposed scope

2. DOC considers the proposed scope (covering 25 Management Blocks) to be realistic. The proposed area is large enough to cover a good-sized herd to allow expression of wapiti deer traits within the herd, but the area is not too large to be effectively managed for both hunting and conservation objectives. The area includes both forest and alpine areas. DOC believes the proposed management units are practical based on catchments, dividing ranges, and existing management practices under the current community agreement between DOC and FWF. However, it should be noted that it will be impractical for monitoring to inform outcomes of management at the scale of individual Management Blocks.
3. Fiordland National Park is classified as a national park under section 6 of the National Parks Act 1980. There are no explicit provisions relating to national parks in the legislation that would hinder HOSI designation on this type of land. Nevertheless, clarification is required around how HOSI designation and a Herd Management Plan align with the principles set out in section 4(2)(b) of the National Parks Act 1980.
4. We note that deer in the Murchison Mountains area (51,000 ha South of the proposed HOSI area) are currently controlled by DOC, while the general approach to deer control across FNP outside of these areas is to encourage commercial WARO operations, with operators authorised through a concession. Management of deer under a wapiti HOSI should allow existing management activities to be maintained across FNP.
5. The Fiordland wapiti herd is currently centred on the proposed HOSI area, but deer with wapiti traits extend beyond the 25 Management Blocks. Those animals outside of the HOSI area will remain classified as “wild animals”, subject to the Wild Animal Control Act.

FWF proposed management objectives

6. The FWF proposes the following management objectives:

Ecological: Manage the Fiordland wapiti herd within the designated area to a level that is compatible with promoting the regeneration of browsed indigenous flora (Part 4.5 of the Fiordland National Park Management Plan). Proposed targets over the first two HOSI management cycle (10 years) to work towards achieving this objective include reaching current wapiti management ecological objectives:

- <10% browse of three indicator species sensitive to deer browse in the alpine zone.
- >0.00 Seedling ratio for forest canopy species.

Hunting: Manage the Fiordland wapiti herd within the designated area in a way that achieves the ecological objectives, generates desired trophy quality, and:

- Coordinates recreational hunting to maximise hunting opportunities and enhance hunter satisfaction.
- Encourages recreational harvest that supports the herds genetic and trophy integrity.
- Supports the viability of commercial deer recovery.

Partnerships and efficiencies: Manage the Fiordland wapiti herd within the designated area in a way that:

- Builds strong partnerships with aligned businesses and other organisations.
- Supports the maintenance or increases in non-government funding streams.
- Provides opportunities for others to contribute to management.

DOC assessment of proposed management objectives

7. DOC considers the proposed management objectives to be broadly appropriate, but that the targets and measures will need further refinement to ensure they enable progression towards the ecological outcomes, including browsing and Seed Ratio Index (SRI) targets. Furthermore, it should be noted that a positive SRI for canopy species is not considered a proposed management objective per se. Instead, a combined positive SRI for species preferred by deer (three indicator species sensitive to deer browse) is the management objective. This will be measured collectively between species, not individually for each species. The management objective of regeneration of browsed indigenous flora applies to both alpine and forested habitats.
8. The FWF proposal suggests that the same methodology used to-date for measuring browsing and SRI be used under the HOSI. We consider this to be broadly appropriate, noting that the scope of the methods and coverage of the sampling may need to be scaled up.

FWF proposed management strategies/methods

9. The FWF proposes the following management strategies/methods:

- To establish and implement a practically functional and efficient management structure and regulatory regime under which the FWF is able to:
 - Successfully implement the herd management plan.
 - Generate sufficient revenue from multiple sources to ensure that the operation of the plan is wholly or largely self-funded.
 - Provide unpaid voluntary support for local conservation and community benefits.
- To deliver sustained positive conservation outcomes in the wapiti area and surrounds by:
 - Maintaining deer impacts below monitoring thresholds which are set to meet ecological objectives by adapting annual harvest/deer removal targets according to monitoring data.
 - Harvest/deer removal targets are achieved through recreational hunting, WARO and culling operations.
 - Where resources permit, provide financial, logistical, and voluntary labour to support local conservation efforts generally.
 - Support the maintenance of pre-existing track and hut networks within the wapiti area for use by all users.
- To provide recreational hunters with continued access to quality wapiti hunting experiences, by maintaining or increasing:
 - Balloted hunting opportunities in the wapiti bugling season subject to maintaining trophy availability.
 - The proportion of wapiti-like deer in the population and trophy quality through education and selective harvesting or culling.
 - The number and quality of trophy bulls by maintaining a healthy low-density deer population with a balanced sex ratio.
- Actively contribute to the maintenance of commercial deer hunting expertise and capability by:
 - Managing the commercial recovery of carcasses (including development of new markets for wild venison).
 - Combining carcass recovery with culling where necessary to meet harvest targets based on ecological thresholds.
 - Annual harvest requirements are set based on browse monitoring of three key indicator species that are susceptible to deer browse, and,
 - A similar process is followed for achieving positive seedling ratio indexes for canopy species once a method is developed as part of herd management plan development.

DOC assessment of proposed management strategies/methods

10. DOC considers the proposed management strategies and methods to be appropriate, though we note that the ecological objectives sought in the proposal are not currently being met under the existing community agreement arrangements. We believe these objectives should be achievable through the adaptive annual harvest/deer removal that is being proposed.

Fees and levies

11. The FWF proposes to have a booking fee charged by the FWF for the Wapiti Ballot to cover the cost of running the balloting system, including advertising and hunter education, for ensuring landing sites are left in an acceptable state following the booking period, and contributing towards managing wapiti within the balloted area as well as contributing to conservation.
12. **DOC agrees that charging such fees for wapiti HOSI hunting is reasonable**, given the current and expected demand for the wapiti bugle ballot.