

25 June 2025

Tēnā koe

Thank you for your request to the Department of Conservation (DOC), received on 06 May 2025, in which you asked for:

*In relation to: The introduction of legislation to enable the designation of herds of special interest*

*Please provide the following information: Please provide Forest & Bird with any internal advice, including any ecological assessments carried out by DOC to consider impacts of a herd of special interest on biodiversity, especially threatened species and ecosystems; memos, and communications between the Department of Conservation (DOC) staff, and between DOC and the Game Animal Council regarding the introduction of legislation to enable the designation of herds of special interest to raise New Zealand's international profile as a hunting destination and help support an increase in hunting tourism.*

*Please also provide Forest & Bird with any correspondence between DOC and the Game Animal Council and the offices of the Minister of Conservation and the Minister of Hunting and Fishing on these matters.*

We have considered your request under the Official Information Act 1982 (the OIA).

On 20 May, in response to a request for clarification from DOC, you confirmed that by “regarding the introduction of legislation to enable the designation of herds of special interest” you were referring to the Game Animal Council (Herds of Special Interest) Amendment Bill, and that your request is limited to matters (i.e. advice or correspondence) in reference or regard to that piece of legislation. You also noted that “If there is other legislation proposed, then our request relates to that also”.

On 30 May we extended the timeframe to respond to your request to 25 June 2025 due to the consultation necessary to decide on the request.

For the part of your request that asks for correspondence between DOC officials, the Game Animal Council, the Minister of Conservation’s office, and the Minister for Hunting and Fishing’s office – I have decided to decline this part of the request in reference to s18(f) of the OIA – i.e., that the information cannot be made available without “substantial collation or research”. This is because the volume of day-to-day emails that mention the HOSI-related legislative amendment work is too large.

However, when we determine that a request need to be declined on this ground, and recognising the public interest in this matter, standard practice is to consider providing some of the information requested (e.g. key documents). Therefore, item 18 contains 13 emails identified as key pieces of correspondence regarding the legislative proposal.

Your request asks for any ecological assessments regarding introduction of legislation to enable the designation of herds of special interest – however, DOC has not undertaken any ecological assessments in relation to the Game Animal Council (Herds of Special Interest) Amendment Bill. For context, I note that ecological assessments may be undertaken as part of the process under the Game Animal Council Act to develop a herd management plan for a potential HOSI.

In addition, note that your two Cabinet papers covered by your request are publicly available via the DOC website here: <https://www.doc.govt.nz/news/oia-responses/2025/>

For the remaining items in scope of your request, I have decided to release the relevant parts of the documents listed in the document schedule below, subject to information being withheld under one or more of the following sections of the OIA, as applicable:

- personal information, under section 9(2)(a) – to protect the privacy of natural persons, including deceased people,
- advice still under consideration, section 9(2)(f)(iv) – to maintain the current constitutional conventions protecting the confidentiality of advice tendered by Ministers and officials,
- free and frank expression under section 9(2)(g)(i) – to maintain the effective conduct of public affairs,
- advice subject to legal privilege, under section 9(2)(h) - to maintain legal professional privilege,
- confidential information, under section 9(2)(j) – to enable the Crown to negotiate without disadvantage or prejudice.

In making my decision, I have considered the public interest considerations in section 9(1) of the OIA and determined there are no public interests that outweigh the grounds for withholding.

I have borne in mind section 18B of the Official Information Act but concluded that use of this provision would not assist in this case.

You are entitled to seek an investigation and review of my decision by writing to an Ombudsman as provided by section 28(3) of the OIA.

Please note that this letter (with your personal details removed) and attached documents may be published on DOC's website.



Nāku noa, nā

A handwritten signature in blue ink, appearing to read 'Sam Thomas'.

Sam Thomas  
Director Policy  
Department of Conservation  
*Te Papa Atawhai*

## Document schedule

Item	Date	Document description	Decision
1	11 November 2024	HOSI leg workshop Q and As	Released in part
2	15 November 2024	24-B-0582 - Memo - Herds of Special Interest update	Released in part
3	13 December 2024	24-B-0632 Confirming Timelines and next steps for herds of special interest	Released in part
4	18 December 2024	HOSI bill expanded scope rationale	Withheld in full
5	19 December 2024	Status update Herds of Special Interest - update for Penny	Released in part
6	24 January 25	Cover Briefing for BIM - 240125 version	Released in part
7	29 January 2025	24-B-0615 - Briefing - Proposed LEG bids for the 2025 Hunting and Fishing Legislative Programme	Withheld in full
9	30 January 2025	Cabinet paper - Cabinet paper - Amendments to the Game Animal Council Act 2013 to clarify the provision for Herds of Special Interest	Proactively released at <a href="http://www.doc.govt.nz">www.doc.govt.nz</a>
10	11 February 2025	25-B-035 Email advice request - Hunting and Fishing Portfolio Cabinet Paper	Released in part
11	12 February 2025	CORM-1500 Memo Meager	Released in part
12	24 March 2025	25-M-0014 - Meeting memo MHF and MOC	Released in part
13	14 March 2025	25-M-0014 - Meeting memo MOC and MHF	Released in part
14	11 April 2024	25-B-0156 - Briefing - HOSI amendment Bill Cabinet paper	Released in part
15	29 April 2024	25-B-0156 - Follow up email advice - Questions and answers around HOSI legislative amendment process	Released in full
16	1 May 2025	Cabinet paper - Game Animal Council Herds of Special Interest Amendment Bill Approval for Introduction	Proactively released at <a href="http://www.doc.govt.nz">www.doc.govt.nz</a>
17	8 May 2024	25-K-0013 - Cabinet Paper Talking Points - Game Animal Council (Herds of Special Interest) Amendment Bill	Released in part
18	n/a	Key correspondence items binder	Released in part