

8 May 2025

Tēnā koe

Thank you for your request to the Department of Conservation (DOC), received on 7 April 2025, in which you asked for Forest & Bird to be provided with a copy of the Wapiti Herd of Special Interest (HOSI) proposal received by DOC.

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

For context, the proposal in question has been prepared by the Fiordland Wapiti Foundation (FWF), with technical and expert support from the New Zealand Game Animal Council (GAC). This was submitted to the Minister for Hunting and Fishing and DOC for consideration as part of the provisions provided for under section 16 of the Game Animal Council Act 2013. The proposal does not constitute advice or recommendations by the GAC or DOC.

I have decided to grant the request, and to release the information to you shortly. The information will be released without undue delay, and within approximately the next week.

We will write to you again with the information once it is ready to be released.

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. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

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

Nāku noa, nā

Ben Reddiex

Director National Programmes
Department of Conservation

Te Papa Atawhai

Ben Rulcher



Subject: Wapiti HOSI Proposal | OIAD-5120

Attachments: FWF Wapiti HOSI Proposal 2025 - DOC-10219353_Redacted.pdf

Tēnā koe

As noted in my letter to you Ref: OIAD-5120 on 8 May 2025, I am herewith releasing to you a copy of the Wapiti Herd of Special Interest (HOSI) proposal received by DOC.

I understand that the Fiordland Wapiti Foundation have also placed the HOSI proposal on their website: <u>Fiordland Wapiti Foundation</u>

Ngā mihi Ben

Ben Reddiex (PhD)

Director National Programmes
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Department of Conservation – Te Papa Atawhai

Toitū te Taiao
We protect and restore nature

Tui. Photo: Sabine Bernert

Department of Conservation
Tre Papa Atawhai



Wapiti Herd of Special Interest (HOSI) Proposal

MARCH 2025

This document has been prepared by the Fiordland Wapiti Foundation (FWF), with technical and expert support from the New Zealand Game Animal Council (GAC). Information to support proposal development has been provided by the Department of Conservation (DOC). This proposal does not constitute advice or recommendations by the GAC or DOC.

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Executive Summary

This document is a proposal to the Minister for Hunting and Fishing (the Minister) to make a herd management plan and, following consultation, designate a Herd of Special Interest for Wapiti in Fiordland National Park.

"A HOSI is a herd of game animals within a defined area on public conservation land, that the Hunting and Fishing Minister has formally designated to be managed for hunting purposes, while ensuring conservation values continue to be protected."

The Game Animal Council Act 2013 (GAC Act) provides that the responsible Minister (Minister for Hunting and Fishing) may, where he or she is satisfied of a range of considerations, "designate any species of game animal in a specified area on public conservation land to be a Herd of Special Interest".

This executive summary briefly describes why the Minister can be satisfied that these considerations are met.

Fiordland wapiti are of special interest to hunters

The Fiordland wapiti herd holds historical significance and is a New Zealand hunting icon, gifted to New Zealand by United States President Theodore Roosevelt in 1905 and representing one of the few truly wild wapiti herds outside their native range. Known for producing the world's largest round-antler trophies, wapiti offer a unique draw for hunters. Fiordland's rugged, remote wilderness presents a challenging yet rewarding hunting experience, attracting thousands of domestic and international hunters annually, with demand for the limited wapiti ballot far exceeding availability.

The herd generates substantial economic and social benefits. An estimated \$1.3 million¹ is spent annually by Wapiti hunters on travel, accommodation, gear and food, and contributions to FWF management, predator trapping and other FWF initiatives. A further \$500,000 of estimated spend is generated through wild animal recovery operations and processing. The wapiti herd also fosters community cohesion and environmental stewardship as exemplified by the 2,600 volunteer hours committed annually to wapiti management, predator trapping and other FWF initiatives.

Recognised in the Fiordland National Park Management Plan, the wapiti provide unparalleled hunting opportunities in one of New Zealand's most remote and rewarding landscapes.

For more detail see Part 1 of the proposal.

¹ This estimate is based on a 2022 ballot participant survey which found an average spend of \$2200 per hunter (600 hunters per annum). This excludes hunter spend outside of ballot periods, currently unquantified.

Fiordland wapiti can be managed for hunting purposes and doing so provides substantial benefits

The Fiordland Wapiti Foundation (FWF) is currently managing the Fiordland wapiti herd under a community agreement with the Department of Conservation. FWF management has a proven track record of providing significant benefits to hunters, conservation and recreational assets, economic and social benefits for hunters, the Crown and the wider community. Wapiti HOSI management is expected to enhance these benefits and strengthen the current FWF arrangement so that the significant conservation, social and financial benefits can continue to be provided into the future.

The FWF has achieved a unique and effective management model that balances conservation and hunting by managing Wapiti for the protection of Fiordland's unique biodiversity first and for hunting purposes a close second. Its initiatives have supported the preservation of Fiordland's biodiversity while maintaining a low-density but high-quality wapiti herd for hunters to enjoy. The FWF's collaborative approach and focus on sustainability has made it a global example of how hunters and conservationists can work together to achieve shared goals.

For more detail see Part 2 and Part 3 of the proposal.

Wapiti HOSI management is consistent with overriding considerations

Wapiti HOSI management is consistent with overriding considerations, including the Fiordland National Park Management Plan and National Park General Policy.

The proposal provides options for strengthening the current wapiti management arrangement and providing long-term security and certainty to the FWF that the benefits it provides can continue independent from government focus and resourcing.

For more detail see Part 4 of the proposal.

Wapiti HOSI management provides value for money

Wapiti HOSI management implemented by the FWF provides sustained effort to protect ecological and hunter values in the area proposed for designation within Fiordland National Park at almost no cost to the Crown.

This equates to an annual non-government financial contribution of \$567,750, including 2,600 volunteer hours committed annually to wapiti management, predator trapping and other FWF initiatives and a small \$40,000 Crown contribution for vegetation monitoring, together achieving substantial benefits to conservation, hunters and the wider community.

For more detail see Part 5 of the proposal.

Conclusion

The Minister can be satisfied that a Wapiti HOSI meets the range of considerations required to enter the statutory phase (developing a herd management plan and undertaking consultation) of designating a Herd of Special Interest.

The Wapiti HOSI will be managed by an organisation with a proven track record for implementing wapiti management consistent with overriding considerations.

The FWF is committed to the long-term management of a Wapiti HOSI and achieving the Wapiti HOSI objectives for the benefit of hunters, communities, the environment and the Crown.

Key abbreviations

- Crown the New Zealand Government
- DOC the Department of Conservation
- FWF Fiordland Wapiti Foundation
- GAC the New Zealand Game Animal Council
- GAC Act the New Zealand Game Animal Council Act 2013
- HMP Herd Management Plan
- HOSI Herds of Special Interest (overall concept, in a legislative context)
- MB Management block
- Wapiti HOSI the proposed Wapiti Herd of Special Interest
- The Minister the Minister for Hunting and Fishing

Proposal Development

This document was prepared by the Fiordland Wapiti Foundation (FWF), as a proposal to the Minister for Hunting and Fishing (the Minister) to make a herd management plan and, following consultation, designate a Herd of Special Interest for wapiti in Fiordland National Park.

"A HOSI is a herd of game animals within a defined area on public conservation land, that the Hunting and Fishing Minister has formally designated to be managed for hunting purposes, while ensuring conservation values continue to be protected."

Technical and expert support was provided from the New Zealand Game Animal Council (GAC) and information to support proposal development was provided by the Department of Conservation (DOC).

Legislative framework

The Game Animal Council Act 2013 (GAC Act) provides that the responsible Minister (Minister for Hunting and Fishing) may, where he or she is satisfied of a range of considerations, "designate any species of game animal in a specified area on public conservation land to be a Herd of Special Interest".

Document structure

This document begins with an overview of the proposer and why a Wapiti HOSI designation is being proposed.

This is followed by five parts that outline information required to support the Minister's decision making, in accordance with the GAC Act:

- Part 1 outlines why the Minister can consider the wapiti herd "of special interest" to hunters.
- Part 2 outlines why the Minister can consider that the wapiti herd can be managed for hunting purposes.
- Part 3 outlines the expected benefits of Wapiti HOSI management.
- Part 4 outlines why the Minister can consider that management of the wapiti herd is consistent with overriding considerations.
- Part 5 outlines the funding contributions from the FWF and Crown required to manage the wapiti herd as a HOSI.

Maps are provided to support the information presented within the proposal. Throughout the proposal, links have been added to locations containing more or relevant information to support the reader.

Proposer

The proposer is the Fiordland Wapiti Foundation (FWF) which is a charitable trust. The FWF was established in 1993 and since, has been a significant force in managing the unique wapiti (elk-type deer) herd and protecting ecosystems in the Fiordland National Park.

The FWF vision:

"To protect Fiordland using sound deer management"

Since its inception, the FWF has achieved a remarkable balance between conservation, hunting, and biodiversity protection. Below is a summary of key successes:

The FWF has successfully managed the Fiordland wapiti herd, ensuring the population remains healthy and sustainable while minimising negative impacts on native ecosystems. This includes:

- Focused efforts on achieving better-quality wapiti leading to the development of a world-class herd, attracting international attention and hunters.
- Overseeing a robust hunting system, encouraging hunters to target specific animals. This has helped maintain the herds quality and genetic integrity while supporting wapiti population management.
- Meeting deer removal targets set by DOC to reduce deer impacts and promote the regeneration of browsed indigenous flora.

The FWF has significantly contributed to protecting the unique biodiversity of Fiordland, one of New Zealand's most ecologically significant regions:

- The FWF actively undertakes pest management to protect native fauna. Efforts target invasive species like stoats that threaten native bird populations, such as kiwi and whio (blue duck).
- By reducing browsing pressure from wapiti and other ungulates, the FWF contributes to the protection of native plants and the overall ecosystem.

The FWF has fostered strong partnerships with various stakeholders, including:

- Joint efforts with the Department of Conservation (DOC) to manage conservation and recreation assets within the Wapiti Area.
- Uniting the hunting community around conservation goals, showcasing hunters' positive role in ecosystem management.
- Partnerships with businesses and other conservation groups bolstering funding and resources for FWF initiatives.

Mana whenua engagement

- The DOC Te Anau team regularly meets with the Kaitiaki Roopu collective and, in particular, with the Oraka Aparima Runaka on a range of issues relating to Fiordland National Park.
 - The management of the Fiordland wapiti area through the FWF is a topic for regular updates and whenever there are any changes.
- The FWF also korerorero with the Kaitiaki Roopu collective on its activities from time to time and are open to working more with mana whenua to recognise their interests regarding Wapiti HOSI management.

The FWF management has had a broader positive impact on the community and economy:

- Wapiti hunting in Fiordland has become a key draw for international hunters, contributing significantly to the local economy.
- Many of the FWF's activities are driven by dedicated volunteers, reflecting strong community support for conservation and recreational hunting.

The foundation plays an active role in promoting awareness about the importance of conservation:

- Hosting educational programs and events for local communities.
- Engaging hunters and visitors on the importance of sustainable practices in Fiordland.

The Fiordland Wapiti Foundation has achieved a unique and effective model of balancing conservation and hunting. Its initiatives have supported the protection of Fiordland's biodiversity while maintaining a low-density but high-quality wapiti herd. The FWF's approach and focus on sustainability has made it a global example of how hunters and conservationists can work together to achieve shared goals.

Why a Wapiti HOSI

The only legislation in New Zealand that allows an explicit focus on hunting outcomes is within the Game Animal Council Act 2013 Herds of Special Interest provisions.

FWF management activities are currently enabled through a community agreement with the DOC.

Wapiti HOSI management would enable hunting-based outcomes to be incorporated into management in a way that is not provided for under the current agreement. It will also strengthen the current wapiti management arrangement and provide long-term security and certainty to the FWF that the benefits it provides can continue independent from government focus and resourcing.

Part 1 – 'Special Interest"

Why is the wapiti herd "of special interest" to hunters?

Clauses in the GAC Act 2013 regarding "special interest," Subpart 3:

S16(1)The Minister may, by notice, designate any species of game animal in a specified area on public conservation land to be a herd of special interest if - (a) the Minister considers that – (i) the animals are of special interest to hunters; and ...

The following bullet points outline why the wapiti herd is "of special interest" to hunters:

Fiordland wapiti have historical significance and are unique:

- Wapiti were gifted to New Zealand by United States President Theodore Roosevelt in 1905.
- The herd has a rich history in NZ hunting folklore, through early trophy notoriety, commercial exploitation and genetic management and research, with numerous books documenting these phases of the wapiti history.
- Wapiti produce the largest round-antler trophies of any deer species, with a distinctive form that sets them apart from other deer species in New Zealand There are no other truly wild wapiti herds outside their native range and within their native range wapiti are typically rare, and opportunities to hunt them are heavily restricted.
- Hunters voluntarily support efforts to preserve the genetic integrity of the Fiordland wapiti herd which has long been threatened by ongoing hybridisation with wild red deer.

Fiordland wapiti provide high-quality sustainable hunting opportunities:

- The wapiti area is remote and rugged, with a storm-prone climate, no roads and few huts, and so poses an extreme wilderness challenge for wapiti hunters.
- Encountering wapiti bulls in the challenging environment of Fiordland's unique natural wilderness is a drawcard for thousands of hunters (domestic and international).
- Every year the wapiti ballot provides 600 recreational hunters the opportunity to have a truly unique hunting experience hunting wapiti bulls during the bugle (the wapiti 'roar' period). Ballot applications for each bugle period are often five times this number.
- Hunters are willing to pay for the limited hunting opportunities in the wapiti area when almost all the rest of Fiordland is open to hunting all year round and permits are free.

The Fiordland wapiti herd generates significant economic and social benefits:

- The Fiordland wapiti herd is an avenue for hunter contributions to support conservation, commercial enterprise and the community.
- The revenue generated from the wapiti herd is estimated to exceed 1.8 million per annum.
 - An estimated \$1.3 million² is spent annually by Wapiti hunters on travel, accommodation, gear and food, and contributions to FWF management, predator trapping and other initiatives.
 - A further \$500,000 of estimated spend is generated through wild animal recovery operations and processing.
- Revenue generated from hunter interest in the wapiti ballot and other wapitibased initiatives provides a significant non-government contribution to wapiti management and other Fiordland conservation and community initiatives, such as protection of whio (blue duck) through predator trapping, track and hut maintenance, and provision of venison to people in need.
- The domestic and international interest in wapiti hunting supports businesses nationwide as hunters prepare for their wapiti hunting experience. This can include gear suppliers, taxidermists and outfitters, as well as airlines and other transport services for getting to and from this remote part of New Zealand.
- The wapiti herd also provides a commercially viable and sustainable resource for Wild Animal Recovery companies and supply chain businesses.
- Management of the wapiti herd has stimulated substantial community collective effort and responsibility, increased community cohesion and provides contributors a sense of belonging, purpose and achievement due to quantifiable positive outcomes of wapiti management for the environment, recreational enjoyment of Fiordland and commercial enterprise.

The "special interest" of the wapiti herd is also recognised in the Fiordland National Park Management Plan – Fiordland provides excellent hunting opportunities in some of the most challenging, remote and rewarding country in New Zealand. (page 267)

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² Based on a 2022 ballot participant survey which found an average spend of \$2200 per hunter (600 hunters per annum). This excludes hunter spend outside of ballot periods, currently unquantified.

Part 2 - Management

Clause in the GAC Act 2013 regarding management, Subpart 3:

S16(1) The Minister may, by notice, designate any species of game animal in a specified area on public conservation land to be a herd of special interest if - (a) the Minister considers that - (ii) the animals can be managed for hunting purposes; and...

The following information (pages 11-23) outlines how the wapiti herd can be managed for hunting purposes.

Scope and scale

Clauses in the GAC Act 2013 regarding scope and scale, Subpart 3:

s(16)(3) The notice under subsection 16 (1) must specify - (a) **the species** of game animal that constitutes the herd; and - (b) **the specified area** of public conservation land where the animals are located; and...

Species of game animal

Proposed HOSI Species

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

Other game species present

- Red deer (Cervus elaphus)
- Chamois (Rupicapra rupicapra)

The proposed management approach for red deer and chamois in the Wapiti HOSI area is to reduce their populations as far as practicable. For efficiency, these species will be targeted opportunistically during wapiti management activities. In the rest of Fiordland National Park, the FWF supports the removal of deer as far as practicable in accordance with the Wild Animal Control Act 1977 as the preferred management approach.

Specified area of public conservation land

Total area proposed for Wapiti HOSI management: 190,700 ha (inclusive of lakes and water bodies).

- Total area is within Fiordland National Park (Map 1):
 - Glaisnock Wilderness area: 123,800 ha

- Fiordland National Park only: 66,900 ha
- Percentage of Fiordland National Park under proposed Wapiti HOSI: 15%.

The proposed HOSI area is bordered by the Tasman Sea to the West, Lake Te Anau to the East and Fiordland National Park to the North and South.

HOSI is proposed over 25 management blocks (MBs) (Map 2). Within the MBs the landscape is comprised of alpine and forested areas. These two landscape types require different management approaches due to differences in aerial accessibility and habitat impacts.

Table 1 Proposed Wapiti HOSI MBs (Map 2)

#	MB Name	Area (ha)
1	Charles	11,104
2	Large Burn	8,699
3	Doon	10,015
4	Mt Tanilba	10,223
5	Looking Glass	6,945
6	Whitewater	6,280
7	Stillwater	7,582
8	Lake Katherine	3,506
9	Stina Burn	4,787
10	Catseye	6,581
11	George River	9,339
12	Edith	4,796
13	Wapiti River	6,895
14	Mt Longsight	8,582
15	Light River	6,772
16	Dark River	6,907
17	Wild Natives	8,258
18	Worsely	15,652
19	Upper Glaisnock	4,509
20	Lower Glaisnock	6,353
21	Loch Burn	7,986
22	Lugar Burn	6,939
23	Mid Burn	8,452
24	Narrows Creek	3,989
25	Billy Burn	9,555

Management objectives and strategies

Clauses in the GAC Act 2013 regarding HOSI management objectives, Subpart 3:

s19(2) The Minister may make a herd management plan for any game animals that the Minister proposes to designate as a herd of special interest.

s19(3) The purpose of a herd management plan is to **set out objectives** and strategies for the management of a herd of special interest to achieve the expected benefits provided for under <u>section 16(3)(e)</u>.

Proposed objectives

The FWF proposed Wapiti HOSI management objectives are as follows:

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 FNPMP⁴). 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 ratio⁵ 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.

³ Ecological targets and associated monitoring will require further development during the statutory phase of HOSI designation.

⁴ Fiordland National Park Management Plan

⁵ Measurements made using DOC Protocol 2024. Seedling Ratio Index (SRI) field protocol V.3. Department of Conservation.

- Supports the maintenance or increases in non-government funding streams.
- Provides opportunities for others to contribute to management.

Proposed Strategies

The FWF is currently managing the Fiordland Wapiti herd in accordance with a community agreement with DOC.

Current management

The strategy for current management includes the following:

- DOC monitoring of three indicator species sensitive to deer browse in the alpine zone to determine annual deer removal targets.
- FWF undertakes annual balloting of the hunting of 25 management blocks during the bugle period (March April).
 - Harvest reporting and jaw collection is required from balloted hunters.
 - Ballot fees are used to support the cost of FWF wapiti management and other conservation initiatives.
- FWF also coordinates Wild Animal Recovery Operations (WARO) as a cost recovery mechanism, reducing animal populations and utilising meat / supporting wild animal recovery companies and supply chain businesses.
 - Where deemed necessary WARO is subsidised by FWF.
- Culling operations are undertaken by the FWF where hunter harvest and WARO do not meet annual deer removal targets.
 - Annual deer removal targets are based on 5 yearly reviews of vegetation monitoring (recent deer removal is approximately 1000 per annum).

Wapiti HOSI management strategy

The proposed strategy for Wapiti HOSI management is as follows:

- To establish and implement a practically functional and efficient management structure and regulatory regime under which the FWF is able to:
 - o 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 outcomes⁶ 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.

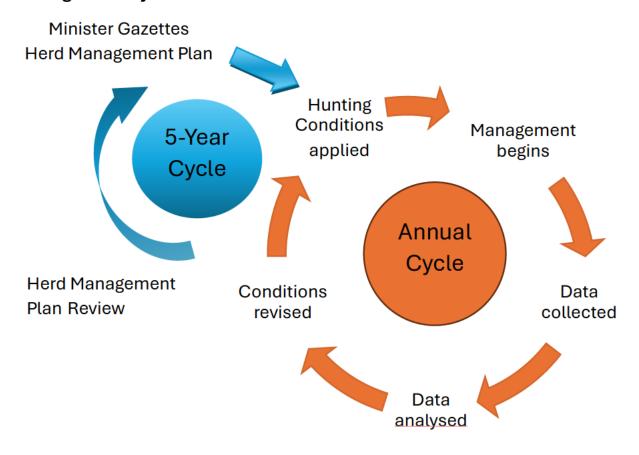
⁶ Conservation outcome targets will require further development during the statutory phase of HOSI designation.

- 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 carcasses⁷ (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,
 - It is envisaged that a similar process will be followed for achieving positive seedling ratio indexes for canopy species once a method is developed as part of herd management plan development.

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⁷ Commercial recovery management will require further development during the statutory phase of HOSI designation.

Management cycle



Management Action Planning

An annual management action plan will be developed prior to the gazettal of hunting conditions (see *Management cycle* above).

The purpose of the management action plan is to outline management and monitoring activities, hunting conditions and authorisations across the designated area over a one-year period. The action plan is developed in accordance with the herd management plan in the context of the longer-term management cycle, up to date information, and financial and operational practicalities.

Monitoring 8

Monitoring is undertaken for each management objective to measure inputs and outputs against management outcomes. DOC currently undertake ecological monitoring, and this is proposed continue and expand to include two measures, one in alpine areas and the other in forested areas, across the Wapiti area (Table 2). Through this increased monitoring and understanding of wapiti impacts, management of the Wapiti HOSI aims to increase the protection of threatened, at risk and not threated

⁸ Vegetation and herd / hunter monitoring will require further development during the statutory phase of HOSI designation.

indigenous species or taonga species that may be impacted by wapiti compared to current herd management.

The FWF currently collects jaws and hunter reports from ballot holders, this is proposed to be retained, with an additional measure to monitor hunter satisfaction. Jaws are aged and jaw length is recorded to monitor the status of the herds age structure, genetic integrity and growth rates. Hunter harvest is recorded to monitor the bull harvest in relation to herd status and to record hunter contributions to deer removal targets. Hunter satisfaction monitoring is used alongside harvest and herd status to identify whether the benefits of HOSI management to hunters are being realised.

A new measure is proposed to monitor the status of partnerships and voluntary contributions to work towards the Partnerships and efficiencies Wapiti HOSI objective.

Table 2 Monitoring Wapiti HOSI Objectives

Objective	Monitoring Mechanism	Frequency	Comparison with current monitoring	Incorporation
Ecological	Browse score of three key indigenous indicator species sensitive to deer browse in the alpine zone	Five yearly cycles.	Expansion of current monitoring	Used to adapt annual deer removal targets to work towards meeting ecological objectives.
	Seedling ratio ⁹ for deer preferred indigenous forest canopy species	Five yearly cycles.	Expansion of current monitoring	Used to adapt annual deer removal targets to work towards meeting ecological objectives.
Hunting	Harvest reporting and jaw collection	Annual (ballot period)	Equivalent to current monitoring	Used to adapt hunter information and education and ballot authorisations to work towards hunting objectives. Also used to adapt WARO and culling to

⁹ Measurements made using DOC Protocol 2024. Seedling Ratio Index (SRI) field protocol V.3. Department of Conservation.

				meet deer removal targets.
	Hunter surveys	Annual	New measure	Used to adapt hunter
				information,
				education and
				recommended
				harvest.
				Also used to adapt
				ballot authorisations
				and the focus of deer
				removal to work
				towards hunting
				objectives.
Partnerships	Comparison of	Annual	New measure	Used to adapt focus
and	partnership and			on partnership or
efficiencies	voluntary			volunteer acquisition
	contribution			and management to
	reports			work towards
				partnerships and
				<u>efficiencies</u>
				objectives.

Proposed management structure

The proposed management structure for the Wapiti HOSI is a distributed responsibility model.

A distributed responsibility model is a framework for distributing responsibilities and accountability across different levels or roles between or within organisations. It involves assigning authority, decisions and tasks to different entities / roles / individuals. This model is common in both organisational structures and governance systems.

Principles of operating a distributed responsibility model

The following principles have been identified as important for achieving mutually beneficial outcomes under a distributed responsibility model. These principles, by mutual agreement, outline how the relevant organisations will engage with each other on Wapiti HOSI management and implementation.

- No surprises
- Regular and clear communication
- Respect for differing perspectives and concerns
- · Open resource sharing
- Conflict resolution through compromise and negotiation
- Long-term commitment

- Inclusive contribution and accountability
- Proactive risk management

Roles and responsibilities

Organisations with roles and responsibilities proposed for the Wapiti HOSI management and implementation include the FWF, GAC and DOC.

Mana whenua may also hold roles or responsibilities depending on the level of engagement individual mana whenua entities seek. Māori have a whakapapa (genealogical) connection with the whenua (land) and a formal Treaty partnership with the Crown – Te Tiriti o Waitangi.

Mana whenua interests - Wapiti HOSI area

- Ngāi Tahu
- Oraka Aparima Runanga (OAR)

It is anticipated that the Department of Conservation will undertake further engagement with mana whenua as part of the statutory process for designation, in accordance with Te Tiriti o Waitangi and Section 4 of the Conservation Act 1987. Section 4 of the Conservation Act 1987 requires the Minister of Conservation and DOC to give effect to the principles of the Treaty of Waitangi in the interpretation and administration of the Conservation Act (including all enactments listed in Schedule 1 of the Act). The GAC Act 2013 is listed in Schedule 1 of the Conservation Act.

The following table (Table 5) outlines the proposed distribution of roles and responsibilities of the FWF, GAC and DOC for the management and implementation of the Wapiti HOSI. Roles proposed to be distributed to the GAC and DOC are in accordance with respective organisational purposes and statutory mandates.

Table 3 Wapiti HOSI management proposed roles and responsibilities for FWF, GAC and DOC

Organisation	Description	Responsibilities within the proposed HOSI
Game Animal Council (GAC)	Statutory entity established under the Game Animal Council Act 2013.	 Exercise delegated powers to enable effective herd management through an agreement with the FWF.
	Represents the interests of the hunting sector and works to improve the	 Develop and maintain hunting authorisation, reporting and data management systems for FWF use.

management of hunting resources while contributing to positive conservation outcomes.

Advises and makes recommendations to the Minister for Hunting and Fishing in relation to game animals.

Regarding HOSI, where the Minister for Hunting and Fishing has delegated management powers to the GAC, the GAC may undertake management functions and exercise powers for effective herd management.

- Provide information and education to the hunting sector to support FWF Wapiti HOSI management.
- Undertake game animal management-based research and system improvements and outcomes to support FWF Wapiti HOSI management.
- Assess costs of managing Wapiti HOSI and options for cost recovery.

The Department of Conservation (DOC)

Government agency responsible for administering the GAC Act 2013, Conservation Act 1987, National Parks Act 1980 and other legislation which provides for the protection and management of public conservation lands and waters of Aotearoa New Zealand.

Manages deer, goat, pig, tahr, and chamois populations in priority conservation areas for conservation purposes in accordance with the

- Leads statutory processes and ensures legislative requirements are met.
- Administers the GAC Act, provides regulatory oversight as required, appoints enforcement officers.
- Leads the design and implementation of vegetation monitoring.
- Undertakes conservation-based research and system improvements and outcomes.

Wild Animal Control Act 1977.

Provides advice to and acts on behalf of the Minister for Hunting and Fishing and the Minister of Conservation.

The Fiordland Wapiti Foundation (FWF)

Incorporated Society established in 1993 undertaking a range of wapiti management and community and conservation initiatives in the Fiordland.

- Leads and delivers operational
 Wapiti HOSI management
 functions in accordance with the
 Herd Management Plan, including:
 - Utilising hunting authorisation systems for hunter and herd management.
 - Undertaking wapiti herd health and harvest demographic monitoring.
 - Undertaking wapiti
 population abundance and
 herd structure management
 activities.
- Utilises reporting and data management systems to:
 - Collect and report hunter and harvest data.
 - Report operational management activities.
- Provides information and education to Wapiti HOSI hunters.

Ministerial Delegations

Clauses in the GAC Act 2013 regarding delegations, Subpart 3:

(1) The Minister may delegate in writing to the Council all or any of his or her powers under section 18 except the power under section 18(1)(e) to capture, convey, or liberate animals that are part of a herd of special interest.

(2) The **Council may exercise any powers delegated** under this section, subject to any general or special directions given or conditions attached by the Minister, in the same manner and with the same effect as if the powers had been conferred directly by this section and not by delegation.

The following Ministerial delegations to the GAC are proposed to enable it to perform its responsibilities outlined in table 2, and effective herd management compatible with the management of public conservation land and resources generally for the Wapiti HOSI:

GAC Act s18(1)

- (a) issue authorisations for hunting, subject to any terms that the Minister thinks fit:
- (b) determine who may receive authorisations, whether by balloting or otherwise:
- (c) cancel or suspend authorisations (for breaches of the terms or conditions of hunting, or otherwise):
- (d) specify, by notice, the conditions under which the animals may be hunted, including the periods and times at which they may be hunted:
- (f) carry out surveys and other assessments regarding the animals and the means of managing them:
- (g) prepare publications relating to the animals and their management:
- (h) collect and disseminate information relating to the animals and their management:
- (i) promote standards (including behavioural and industry standards) for game animal hunting and game animal management:
- (j) authorise or carry out operations for managing and controlling the size of the population, including the payment of bounties, grants, or subsidies.

Compliance

Clauses in the GAC Act 2013 regarding compliance, Part 2:

s30(1) A person commits an offence who hunts or kills any game animal that is part of a herd of special interest without (a) an authorisation, a licence, or a permit issued for the purpose under this Act or any other Act; or (b) complying with the terms of any such authorisation, licence, or permit. (2) A person commits an offence who hunts or kills any game animal that is part of a herd of special interest without complying with a condition specified under section 18(1)(d).

s31 (1) A person commits an offence who, without the Minister's written authority, captures, conveys, or has in his or her possession any live game animal that is part of a herd of special interest.

s32(1) A person commits an offence who, without the Minister's written authority, liberates any game animal that is part of a herd of special interest or allows any game animal that is part of a herd of special interest to escape.

s33 A person commits an offence who (a) is stopped by an enforcement officer or honorary enforcement officer who observes the person hunting or killing animals in a herd of special interest; and (b) fails, within 5 working days, to produce an authorisation, a licence, or a permit issued for the purpose under this Act or any other Act after being requested to do so by an enforcement officer or honorary enforcement officer.

s38 The provisions of <u>Schedule 1</u> apply to enforcement officers and honorary enforcement officers.

Two Honorary Enforcement Officers are proposed initially, to be appointed by the Director General of Conservation. Their role within the first management cycle will be to ensure Wapiti HOSI hunters hold the required authorisations and adhere to gazetted hunting conditions.

Fees

Clauses in the GAC Act 2013 regarding fees, Subpart 2:

34(1) The Governor-General may, by Order in Council, on the recommendation of the Minister, for the purposes of funding services provided, powers exercised, or functions performed by the Council under this Act, make regulations prescribing any or all of the following fees or levies payable to the Council:

(a) fees for hunting any animal that is part of a herd of special interest:

No fees payable to the GAC for hunting wapiti that are part of the Wapiti HOSI are to be set within the first five-year Wapiti HOSI management cycle.

A booking fee will be 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.

Part 3 – Wapiti HOSI management expected benefits

Clause in the GAC Act 2013 Subpart 3 regarding expected HOSI benefits, Subpart 3:

s16(3)(e) The notice under subsection 16 (1) must specify **the expected benefits to be gained** by managing the animals for hunting purposes.

Wapiti HOSI management is known to provide significant hunter, conservation, cost savings and wider community benefits. Wapiti HOSI management is expected to enhance these benefits and strengthen current FWF management activities, so that the significant conservation, social and financial benefits can continue to be provided into the future.

Benefits for hunters

Within the designated area, the benefits of FWF Wapiti HOSI management are:

- Securing availability of male wapiti for recreational hunting.
 - Achieved by preferentially targeting females during population management activities to maintain a sex ratio of 1.1 males per female.
- Increased trophy quality of available male wapiti.
 - Achieved by maintaining a low-density wapiti population to ensure male wapiti nutritional requirements for trophy potential are met.
- Protection of wapiti genetics from dilution through red deer hybridisation.
 - Achieved by selective removal of red deer and the least wapiti-like hybrids.
- A sustainable and viable resource for commercial recovery.
 - Achieved by maintaining a low-density wapiti population to maximise deer growth rates.
- Healthy environment of thriving flora and fauna to enjoy while hunting.
 - Achieved by maintaining a low-density wapiti population.
- Continued and enhanced ability to contribute meaningfully to conservation.
 - Achieved through leveraging the HOSI designation to increase volunteer interest and hunters' willingness support management objectives when making harvest decisions.

Benefits for conservation

Within the designated area, the conservation benefits of FWF Wapiti HOSI management are:

- Sustained wapiti population management.
 - Achieved by having an organisation singularly dedicated to the management of wapiti and the environment wapiti inhabit.
- Sustained red deer and chamois population control effort.
 - Achieved by also targeting these species during annual wapiti management activities.
- Sustained vegetation monitoring to ensure Wapiti HOSI management achieves vegetation outcomes.
 - Achieved in accordance with DOC current practices and protocols.
- Reduced vegetative impacts
 - Achieved by:
 - Implementing population management actions that work towards achieving ecological objectives.
 - The application of management that considers the implications of herd structure and wapiti behaviours on vegetation impacts.

Additional conservation benefits

The FWF will also continue to contribute substantially to other local conservation programmes. These currently include:

- Sustained protection of a highly endangered bird (takahe) by co-funding the removal of deer from the Murchison Mountains.
- Improved protection of whio (blue duck), by coordinating and providing logistical support for volunteers undertaking a large stoat trapping programme involving deployment and regular checking (4 weekly) of c. 500 stoat/rat traps at seven wapiti area sites.
- Contributing to native bird protection and monitoring by implementing a citizenscience programme of annual bird counts by wapiti hunters during the ballot hunts.
- Protection of endangered native birds generally by arranging ongoing sponsorship to undertake predator and possum control in the Nitz Valley.

Wider community benefits

The wider community benefits of FWF Wapiti HOSI management are:

An engaged and connected wapiti hunting community that understands the
relationships between harvest, wapiti populations and habitat quality, enabling
hunter decisions that have the best interest of the herd and the environment in
mind.

- Higher levels of hunter engagement in Fiordland's conservation and facility management (e.g. predator trapping, forest and habitat protection and hut maintenance).
 - The FWF will continue to maintain 7 huts within the wapiti area that are of historical interest, and which continue be used by hunters, hikers and other recreationalists. This includes repairing and updating the huts as required.
- Increased commercial benefits, through HOSI promotion and long-term secured commercial resource supply.
 - The FWF aims to ensure the ongoing viability of commercial carcass recovery by developing new local markets for venison.
- Greater awareness in the wider community of the value of wapiti hunting to hunters, the Western Southland community and economy, and the environment.

Cost benefits¹⁰

Within the designated area, the cost benefits of FWF Wapiti HOSI management are:

- Sustained non-government funding of wapiti management and additional conservation and facility maintenance.
- Sustained investment in Wapiti management yielding lasting benefits for conservation and communities.
- Reduced risk of future expenditure on relevant social conflict, ecological damage management and litigation.

¹⁰ Cost benefit actuals are calculated as part of the statutory phase of HOSI designation, as these rely on provisions set out in the herd management plan. For more detail on cost benefits for the proposed management see <u>Part 5</u> of this proposal.

Part 4 – Overriding considerations, the purpose of the Wild Animal Control Act 1977 and the status of the land

Clauses in the GAC Act regarding HOSI designation and overriding considerations, status of the land and purpose of the Wild Animal Control Act 1977 – Part 1, Subpart 3:

s16 (1) The Minister may, by notice, designate any species of game animal in a specified area on public conservation land to be a herd of special interest if – (a) the Minister considers that (iii) management of the animals for hunting purposes is **consistent with the overriding**considerations; and

(b) the Minister has regard to— (i) the purposes of the <u>Wild Animal</u> <u>Control Act 1977</u>; and (ii) the status of the land, particularly the designation of the land as a conservation area, national park, or reserve; and (iii) the overriding considerations.

GAC Act s4(1) -

Overriding considerations means—

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

Purpose of the Wild Animal Control Act 1977

WAC Act 1977, Section 4 Wild animals to be controlled

- (1) This Act shall apply to all land, having regard to the provisions of any Act applying to the land, and shall be for the purposes of controlling wild animals generally, and of eradicating wild animals locally where necessary and practicable, as dictated by proper land use.
- (2) This Act shall be administered, having regard to the general purposes specified in subsection (1), so as to—
 - (a) ensure concerted action against the damaging effects of wild animals on vegetation, soils, waters, and wildlife; and
 - (b) achieve co-ordination of hunting measures; and
 - (c) provide for the regulation of recreational hunting, commercial hunting, wild animal recovery operations, and the training and employment of staff.

FWF Wapiti HOSI management is consistent with the purpose of the Wild Animal Control Act 1977. It achieves:

- Management of wapiti, red deer and chamois by controlling populations, in accordance with proper land use (see *Proper land use* below for more detail).
- Management is achieved through the coordination of hunting measures to allow for the regeneration of browsed indigenous flora.
- Management is achieved through the regulation of recreational hunting, commercial hunting, wild animal recovery operations, and the training and employment of staff.

Status of the land

Table 4 Land status of the area proposed for HOSI designation.

Туре	Name	Legislation	Section	Area ha
National Park	Fiordland	National Parks	6	190,700ha
	National Park	Act 1980		
Wilderness Area	Glaisnock	National Parks	14	123,800ha
	Wilderness	Act 1980		(within Fiordland
	Area			National Park)

Proper land use

National Parks Act 1980

Section 4 Parks to be maintained in natural state, and public to have right of entry

Clause identified as limiting subject to government focus and resourcing:

Section 4(2)(b) except where the Authority otherwise determines, the native plants and animals of the parks shall as far as possible be preserved and the introduced plants and animals shall as far as possible be exterminated.

The FWF considers that its current wapiti management and the proposed Wapiti HOSI management is in line with proper land use.

Comparatively, wapiti, red deer and chamois populations within the area
proposed for designation would be increased in the absence of FWF wapiti
management. (Note: this is subject to the Department of Conservation's
resourcing limitations and consequential need to prioritise conservation and
recreational management across around one third of New Zealand.)

A Wapiti HOSI would strengthen current FWF management activities and provide longterm security and certainty to the FWF that the benefits it provides can continue independent of fluctuations in government focus and resourcing.

Section 14 Wilderness areas

- (1) Subject to this section, while any area is set apart as a wilderness area,—
 - (a) its indigenous natural resources shall be preserved:
 - (b) no building or machinery shall be erected on the area:
 - (c) no building, machinery, or apparatus shall be constructed or maintained on the area:
 - (d) no animals, vehicles, or motorised vessels (including hovercraft and jet boats) shall be allowed to be taken into or used in the area and no helicopter or other motorised aircraft shall land or take off or hover for the purpose of embarking or disembarking passengers or goods in a wilderness area:
 - (e) no roads, tracks, or trails shall be constructed in the area.

FWF has not identified any inconsistencies in Wapiti HOSI management with proper land use within the Glaisnock Wilderness Area.

Interaction of legislation, general policy and statutory planning documents

Table 5 Statutory planning documents relevant to the proposed Wapiti HOSI area.

National Park	Statutory planning documents	Year	Status
Fiordland National Park	General Policy for National Parks	2005	Active
National Park	Fiordland National Park Management Plan	2007	Active – Due for review

Fiordland National Park is administered in accordance with the lowest level statutory planning document, the Fiordland National Park Management Plan (FNPMP). The

FNPMP must be consistent with General Policy for National Parks and overarching legislation, including the Wildlife Act 1953, National Parks Act 1980, Conservation Act 1987 and Wild Animal Control Act 1977 (WAC Act).

Current FWF management activities are enabled under the Fiordland Wapiti Foundation Management Agreement pursuant to section 53(2)(i) Conservation Act 1987.

Consistency with overriding considerations

FWF has not identified any inconsistencies in the proposed Wapiti HOSI that are inconsistent with statements made in the FNPMP

The Wapiti HOSI is consistent with statements made in FNPMP Part 4.5:

- (1) The area proposed for designation does not contain any ecological management areas/units, e.g. areas of high natural biodiversity values in Fiordland National Park most at risk from introduced animals.
- (2) The area is a whio recovery site. HOSI designation would not negatively impact these recovery efforts and may increase voluntary efforts.
- (3) Wapiti HOSI applies all financial, social and practical means of managing the wapiti population to allow for the regeneration of browsed indigenous flora.
- (4) Wapiti HOSI includes monitoring of vegetation condition within the area proposed for designation as well as the results of overall herd management.
- (5) The Wapiti HOSI is a habitat management programme with specific wapiti management measures.
- (6) The Wapiti HOSI is a FWF initiative that works to achieve a wapiti management program set out in a statutory herd management plan.
 - (a) Supporting biodiversity objectives set out in the FNPMP,
 - (b) Supporting conservation of indigenous browse species
 - (c) Is reviewed at five yearly intervals.
- (7) Wapiti HOSI provides the management of opportunities for Wild Animal Recovery Operations (WARO).
- (8) The FWF supports continued protection of habitat in the Murchison Mountains
- (9) Integrates the management of game animals and pest management programs.

In addition, proposed Wapiti HOSI management would <u>not</u> limit non-hunting activities beyond that specified under current permissions, nor negatively impact any pre-existing community, conservation or infrastructure programs or initiatives within the area proposed for designation. FWF supports or is involved in all current community conservation or infrastructure initiatives within the area proposed for designation.

Part 5 - Funding

Clause in the GAC Act regarding the cost of managing HOSI, Part 1, Subpart 2:

S7(1) The Council has the following functions in relation to game animals: (o) to assess the costs of managing herds of special interest and make recommendations to the Minister on ways to recover those costs.

Assessing costs and options for cost recovery

Assessing costs of managing HOSI and options for cost recovery is undertaken by the GAC in accordance with its legislative function, GAC Act section 7 (1)(o). To support the Minister in deciding whether to enter the statutory process for Wapiti HOSI designation and thus determining to draft a HMP from which the GAC may undertake its function, the FWF provides the following information.

FWF and Crown Contributions

FWF contributions

It is anticipated that the FWF will fund the operational implementation of the Wapiti HOSI, on the proviso that the objectives and strategies set out in the HMP reflect current herd management.

Current FWF contribution to wapiti and wapiti habitat management are \$217,000 plus \$200,000 equivalent of WARO contributions and a further 2,600 volunteer hours annually. The FWF contribution covers the following:

- Operational staff resourcing.
- Herd health and status monitoring methods.
- Population management operational activities.
- Ongoing stakeholder engagement, information sharing, education and FWF reporting.
- Partnership management and funding acquisitions.
- Supplementary FWF predator trapping and backcountry facility maintenance.
- Contributions to Murchison Mountains deer control (outside of the proposed area for HOSI designation).

Crown contributions

To date the cost of vegetation monitoring within the wapiti habitat has been funded by the Department of Conservation (approximately \$20,000 per annum). Wapiti HOSI vegetation monitoring has been estimated to cost approximately double this. It is the

FWF expectation that the cost of designing and implementing vegetation monitoring is funded by the Crown.

It is anticipated that all other costs associated with operating a Wapiti HOSI will be funded by the Crown through the Game Animal Council and Department of Conservation. Other costs may include the development of processes and systems to support FWF implementation:

- Compliance processes (e.g. two Honorary Enforcement Officers).
- · HMP review processes.
- Management and outcome reporting statutory processes and systems.
- Hunting authorisation and data management processes and systems.

These costs will need to be assessed by the Game Animal Council and Department of Conservation in accordance with respective <u>roles and responsibilities</u>. The FWF expects that modern technologies will be used so that the development of processes and systems are one-off expenditure with minimal maintenance costs. Also to enable the implementation of practically functional and efficient management structure and regulatory regime under which the FWF is able to successfully implement the herd management plan, as per the proposed <u>FWF management strategy</u>.

Budget

This budget is based on current management spend by the FWF. Accordingly, the budget will need to be re-analysed if the objectives and strategies outlined in the draft herd management plan deviate from current management, excepting the increased contribution to vegetation monitoring.

Table 6 Annual contributions by the Crown and the FWF to fund Wapiti HOSI management.

Contributions*	Activity	Total \$
FWF		
	Operations staff resourcing.	150,000
	Herd health and status monitoring methods.	2,000
	Aerial deer removal operations	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	80,000
Voluntary expertise ~100 h	ours (\$120 per hour) 12,000
2,500 non-expert voluntee wage)	r hours^ (hourly minimum 58,750
Total overall FWF contributions	367,750
Crown	
Vegetation Monitoring	40,000
TBD# Underwriting (excludes co WARO)	st recovered through 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.

FWF funding strategy

The FWF is currently funded through money raised through the Wapiti Ballot, sponsorship, fundraising and deer recovery.

The FWF funding strategy is to retain the Wapiti Ballot, and retain / increase sponsorship and fundraising activities, and increase the profitability of deer recovery.

Table 7 Risk management

Ref	Risk	Likelihood	Level of Risk	Key Mitigating Controls, Strategies and Plans
1.1	Failure to secure non-government funding.	Low	Moderate	FWF reserves are sufficient to underwrite the minimum required for Wapiti HOSI management over the first two years (\$217,000 per annum). Crown could consider options for underwriting subsequent years, though based on the long history of FWF financial health, the need for such is minimal.

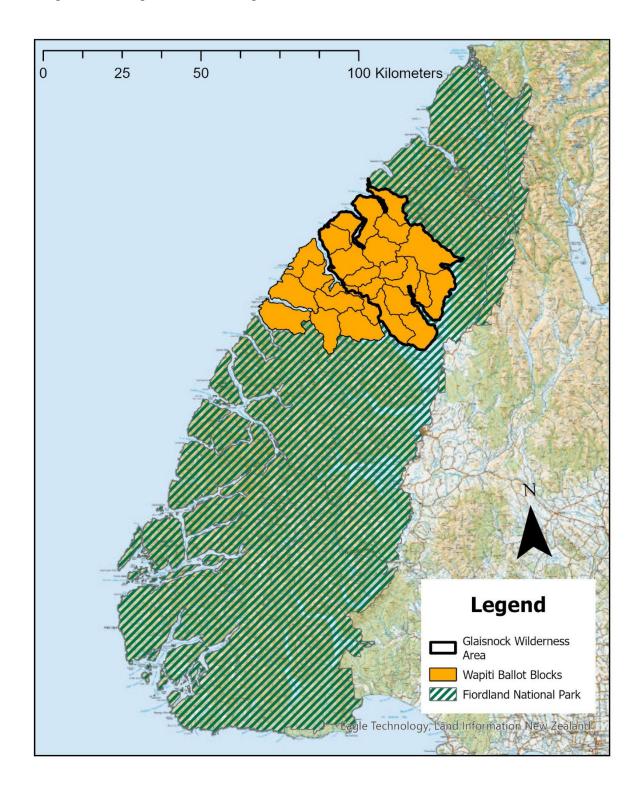
^{**} WARO is a cost neutral deer management contribution of ~80% of current annual deer removal targets.

^{*}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 (see table 6).

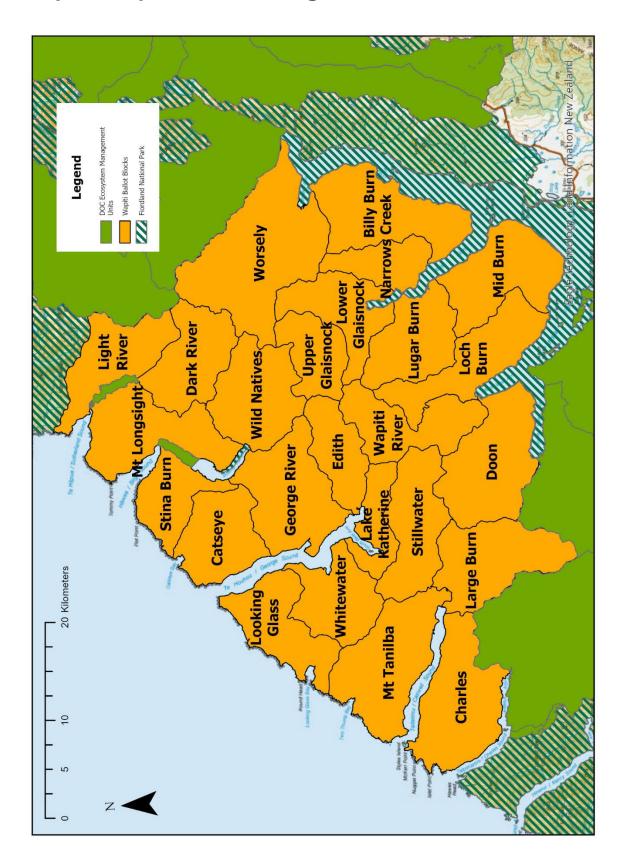
[^] Currently, an estimated 2,600 hours of volunteer support are provided to the FWF to support its activities.

1.2	Loss of expertise	Low	Low	The FWF has an emergency succession plan for such an event.
1.3	Political risks	Low	High	Any change in political focus on the HOSI legislation and implementation is a high level of risk until designation has been made. Completion of the HOSI process will provide some insulation from this risk.
1.4	Hunter acceptance of a HOSI	Low	Low	Continue to provide well considered stakeholder engagement, information sharing, education and reporting.

Map 1: Proposed Wapiti HOSI area and land status



Map 2: Wapiti HOSI Management Blocks



Map 3: Integrating wapiti management for hunting whilst protecting conservation

