

# Sika Herd Management Plan Submissions Record

## Submission Attachments - submitter last names A - Coop

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# Bruce Allan - Project Peel Society Inc

Submission Details

## Eirwen Harris Mitchell

---

**From:** Bruce and Rosa Allan s9(2)(a)  
**Sent:** Monday, 8 December 2025 3:28 pm  
**To:** sikaHOSIHMP  
**Subject:** Sika Herd of Special Interest Draft Herd Management Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Orange Category, Green Category

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To whom it may concern.

Please find attached our submission to this plan from Project Peel soc *inc.*  
Thank you for the opportunity to have our say.

Regards  
Bruce Allan (chairperson)



Herd management plan for Sika Herd of Special Interest.docx

s9(2)(a)

s9(2)(a)

Thursday December 4 2025

## Submission on: Draft herd management plan for Sika Herd of Special Interest

By **Project Peel Soc Inc**

Contact person: Dr Bruce Allan *Chairperson*

Email: s9(2)(a)

Mobile: s9(2)(a)

Project Peel is an Incorporated Society whose goal is the ecological restoration of the Dept of Conservation administered Peel Forest Park Scenic Reserve, in South Canterbury. Our focus area is the original Reserve, covering more than 800 hectares. This ancient podocarp forest is under increasing threat from invasive weeds and pests. We have been operating for 10 years.

Thank you for this opportunity to have our say.

Project Peel is not opposed to any plan that helps to effectively address the current over-population of feral deer numbers in New Zealand. We support a pragmatic approach to this problem where conservationists, recreationists, private land users and hunters can all work together to achieve, in the Hon James Meager's words, "*so that natural and historic resources are protected.*"

The proposed management plan for sika in Kaimanawa Forest Park, Kaweka Forest Park and Kaweka Forest Conservation Area falls well short of achieving the Minister's claims. We feel the proposal is ill-conceived in focus and lacking in detail, particularly in relation to implementation strategies.

A major concern for us is that the goals in this plan for sika herd management differ hugely from accepted and practical conservation goals for "*wild animal management.*" While the objectives include references to allowing "*for the maintenance of forest ecosystem processes*" the plan's overarching objective (*Section 3: Objectives and strategies*) is "*to ensure that the objectives for managing sika for hunting purposes are met.*" In this objective, the maintenance of the forest ecosystem is far from precise and measurable, whereas enhancement of the sika hunting experience is explicit (*objectives 2*). For the plan to achieve any success, the protection of

*“threatened species and their habitats”* must be reworded to clearly **identify** and **maintain** the **minimum feral animal density** required to achieve the desired ecological benefits.

The plan avoids ecology specifics in other areas, particularly around monitoring, research and reporting. The monitoring (objective 7) and research (objective 8) are focused on supporting sika management to *“improve the hunting experience”* (strategy description 1). In several places there is emphasis on the attractiveness of trophy hunting as a draw card. By contrast, there is no specific strategy description for maintenance of the ecology and indigenous biodiversity, only an undertaking of *“monitoring and research to support management and decision making”*.

The plan makes a superficial reference to cultural and heritage values. Tangatawhenua with mana whenua over the area are acknowledged. The sika area is described as having *“a long history of European influence and activity.”* It amounts to 150 years and is detailed in a further 173 words. However the *“deep concern about the degraded state of the ngahere (forest) and the threats introduced species pose”* of our treaty partners with 5 or 600 years kaitiakitanga is mentioned and merely left at that. While community involvement is proposed, the draft plan expects the Minister for Hunting and Fishing to delegate powers to manage the herd to the Game Animal Council working *“closely”* with the Central North Island Sika Foundation and the Department.

Monitoring and research is *“to support management”* of the sika herd. The words *“seek opportunities”* and *“explore opportunities”* for iwi and hapu involvement to share perspectives are used, but that involvement is limited by the overarching objective of delivering sika trophy hunting opportunities in the Park and Conservation areas.

## Fiscal Risk

The plan itself lacks specific costs. The Department of Conservation summary of the Sika HOSI proposal estimates administering the HOSI to cost between \$823000 and \$917000 annually, with the Sika Foundation contributing between \$313000 and \$426000. This makes the Crown liable for approximately \$550000 ±\$50000. We are concerned that the cost of the plan's implementation may be underestimated. There is not any indication of the extent of revenue to be gained through hunting fees or concession charges. Will any fees be set high enough to allow surplus revenue to be directed to conservation initiatives. The funding of *“other management options if recreational hunting is insufficient to maintain a sika population that achieves the ecological objectives”* (strategy 1.3) is not referenced, nor are the ecological objectives other than in broad terms. The Government (tax payer) must not be expected to cover shortfalls. We feel there must be a far more robust guarantee of hunter support toward local conservation initiatives.

This proposal acknowledges the devastation already achieved by deer and sika in particular and notes that professional control operations will still be needed in some areas. It also notes that we already know that aerial control operations are the most effective way of managing deer populations. We argue that spending the Crown \$550000 in this way would be a more secure way forward for protecting the ecology of the Parks and maximizing the “trophy” value of sika for recreational hunters.

Will the plan restrict in any way public access, recreation, and future public conservation efforts to control other pest species?

We agree that, if implemented, the plan must be subjected to regular review. However, any decision on the need for amendment should not be at the sole discretion of the Minister for Hunting and Fishing.

Our experience at Peel Forest is that recreational hunting as a sole or even partial means of animal pest management for conservation does not work. We have attached some very recent photos from within the Peel Forest Park Scenic Reserve, showing the severe impact of ungulate browse (mainly deer) on the podocarp understory. Currently the Dept of Conservation's only means of "managing" this animal pest problem is by allowing seasonal recreational hunting (*photos attached*).





We are unsure of the submission process going forward. We would like the opportunity to speak to our submission if this is possible.

# Ross Allen - NZDA Southern Lakes Branch

Submission Details

## Eirwen Harris Mitchell

---

**From:** Ross Allen s9(2)(a)  
**Sent:** Monday, 8 December 2025 4:06 pm  
**To:** s9(2)(a) Branch President; sikaHOSIHMP  
**Subject:** Sika Hosi HMP submission on behalf of SLNZDA  
**Attachments:** SLNZDA Sika Hosi.pdf

**Categories:** Green Category

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Attached is the submission on behalf of the SLNZDA

Thanks,

Ross

**Ross Allen**

Strategist and Designer  
Founder | Leverage  
MBA BcApSc



[Book a Call with Me](#)

---

s9(2)(a)  
s9(2)(a)  
[www.leverage.nz](http://www.leverage.nz)

60 Toru Road, Paraparaumu Wellington  
36 Grant Road, Frankton, Queenstown

# Submission on the Proposed Sika Herd of Special Interest (HOSI) Management Plan

From: Southern Lakes Branch of New Zealand Deerstalkers Association  
Monday, 8 December 2025

## 1. Introduction

Southern Lakes NZDA welcomes the opportunity to comment on the Draft Sika Herd of Special Interest Herd Management Plan. Although our branch is based in the South Island, many of our members have deep connections to the Central North Island, regularly hunt sika, and are active contributors to national conversations about good game animal management.

We support the intent of establishing a Herd of Special Interest for sika, recognising the herd's heritage, the unique hunting experience it provides, and the contribution a well-managed sika population can make to both biodiversity outcomes and recreational opportunity.

However, several amendments are required to ensure the Plan is workable, proportionate, and aligned with the principles of modern hunter-led management.

## 2. Overall Position

SLNZDA supports the Herd Management Plan in principle, provided that key changes are made to protect the integrity of the Sika herd, enable effective hunter-led management, and maintain positive social, cultural, and environmental outcomes.

## 3. Why the Sika Herd Matters

For our members, and for hunters across New Zealand, the sika herd represents far more than a game animal. It is a unique subspecies with over a century of heritage in the Central North Island, offering a challenging and rewarding hunting experience, particularly during the rut.

The herd provides a powerful connection to wild places and the outdoors, contributes to community identity and local economic activity, and supports a culture of stewardship among those who care for the land.

It is also a pathway for families and young hunters to build skills, resilience, and a deep appreciation for the ngahere. Any Herd Management Plan must recognise and protect these values.

## 4. Social and Community Outcomes

SLNZDA strongly supports the principle that a Sika HOSI should strengthen hunter and community-led involvement in deer management.

The draft Plan acknowledges this intent but embeds an administrative structure that risks overshadowing on-the-ground work. A successful HOSI requires genuinely shared leadership between hunters, iwi, the Sika Foundation, GAC and DOC. The plan should explicitly support:

- hunter stewardship
- community contributions to conservation initiatives
- local social and economic benefits
- hunter access that remains fair and widely available
- iwi partnership integrated meaningfully into operations

This aligns with Strategy 4.3-4.7 of the draft Plan, which rightly encourages community stewardship, education, and contributions to conservation (

## **5. Funding Structure**

To ensure transparency and efficiency, all funding for the Sika HOSI should flow directly from the funding source to the implementing organisation, rather than through DOC or GAC where discretionary redistribution can occur.

The draft HMP anticipates costs (including control operations, monitoring, reporting) but does not clearly specify where financial responsibility sits or how funds flow. This needs to be clarified.

Funding should not pass through DOC, GAC, or any other government agency in a way that creates discretionary redistribution. This approach protects efficiency, reduces cost, and ensures the money is used for on-the-ground management.

## **6. Financial Reporting Requirements**

Financial reporting should not be written into the Herd Management Plan itself. Embedding financial compliance inside a high-level plan risks creating unnecessary administrative overhead that delivers no improved ecological or social outcomes.

SLNZDA recommends keeping financial reporting expectations simple and outside the HMP framework.

## **7. Operational Plan Structure**

The operational plan must remain a separate and flexible document. It should serve as a practical management tool that can be adapted as conditions, knowledge, and innovation evolve.

This HOSI provides an opportunity to continue improving ground-based deer management in New Zealand. A fixed, overly prescriptive operational plan will stifle innovation and slow down effective deer management.

SLNZDA supports the operational plan being developed and updated by the implementing organisation, the Sika Foundation, with DOC oversight limited to ensuring alignment with the high-level objectives of the HMP.

## **8. Vegetation and Ecological Monitoring**

Monitoring is crucial, but it must be meaningful, efficient, and directly linked to the stated objectives of the management plan.

SLNZDA recommends the following:

- Monitoring should focus on measures that reflect actual deer impacts
- It must avoid unnecessary cost and administrative burden
- Monitoring must inform adaptive management and practical decision-making
- Faecal pellet counts should be excluded, as they are subjective, expensive, and do not accurately reflect deer impact on vegetation

Ecological monitoring should drive genuine outcomes, not become an exercise in bureaucracy.

## **9. Roles, Responsibilities, and Delegation**

Delegations should sit with the organisations best equipped to deliver outcomes.

Delegations should sit with those best equipped to deliver results:

The Sika Foundation has the practical expertise to implement the Sika HOSI and should be explicitly empowered to develop and execute the operational plan.

DOC and GAC oversight should be high-level, ensuring alignment with statutory obligations, not day-to-day operations.

The plan must also clarify whether the HOSI sits under DOC or GAC legislation to avoid confusion, duplication, or inconsistent expectations.

## **10. Set the Correct Tone: Management, Not Control**

Language matters. A sika HOSI is intended to deliver active management, not traditional deer “control”.

The use of the term “control” throughout the plan reflects outdated approaches that have historically failed to achieve balanced outcomes. The plan’s language should be reframed to reflect:

- Modern deer management practice
- The intent of the HOSI legislation
- Collaboration rather than eradication
- The reality that sika are a managed, valued herd, not a pest programme

SLNZDA recommends removing the term “control” and replacing it with “management” throughout the HMP.

## **11. Conclusion**

Southern Lakes NZDA supports the establishment of a Sika Herd of Special Interest, provided the draft Herd Management Plan is amended to:

- simplify financial and monitoring requirements
- empower the Sika Foundation with clear delegated authority
- maintain flexibility in operational planning
- focus on impact-based monitoring methods
- remove faecal pellet counts
- ensure funds flow directly to the implementing body
- strengthen community-led stewardship
- adopt a modern “management” rather than “control” narrative

The sika herd is a nationally significant resource and a treasured part of New Zealand’s hunting heritage. This Plan is an opportunity to secure its future in a way that strengthens conservation outcomes, supports local communities, and recognises the vital role hunters play in managing our backcountry.

Southern Lakes NZDA Committee  
Southern Lakes Branch of the New Zealand Deerstalkers Association

# Dee Austring

Submission Details



# **Nigel Baker - Te Matai No1&2 Blocks Trust Te Kotahitanga o Ngā ti Tā kōhāretoa**

Submission Details

## Emma Bennett

---

**From:** Nigel Baker s9(2)(a)  
**Sent:** Monday, 10 November 2025 11:40 am  
**To:** wapitiHOSIHMP  
**Cc:** s9(2)(a)  
**Subject:** Sika Deer Management.

**Categories:** Green Category

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Tena koe

We refer to the above and forward the following submission.

Firstly the creation of the Kaimanawa Park was at the expense of Ngati Tuwharetoa hapu as recorded in the Waitangi Tribunals findings 2008 'He Maunga Rongoa' . The Kaweka Park was initiated from the confiscation of Northern Hawkes Bay Mana whenua of Ahuriri including the tribes that resided between the Ngaruroro and Tutaekuri rivers.

Both of these maunga have a significant relationship with Mana Whenua referred who are recorded as kaitiaki that have an ongoing relationship to the protection and management of wahi taonga throughout the rohe.

The initiation of a management plan must therefore coincide with the kawa and tikanga of Hapu involvement .

Simply we are not against a management plan that involves our input and acknowledges our use purpose of the Maunga that we have exercised mairano.

In that respect we insist that any management or commercialization of the Maunga involve hapu at the table with equal voting rights. We do wish to emphasize that we will not support any programme that involves the wholesale poisoning or use of 1080 upon the whenua and advocate that more funds should be allocated for a scientific remedy that can work hand in hand with a ground- based operation utilizing our rangatahi labour and those wanting to contribute to the well being of te taiao.

I wish to be kept up with developments

Ma te wa

Nigel Baker

Te Matai No1&2 Blocks Trust

Te Kotahitanga o Ngati Tuwharetoa.

# Barbara Ball - Mā kai Dētea Kaitangi 7 laia s Trust

Submission Details

## Eirwen Harris Mitchell

---

**From:** Nataria Lucas-Payne | Mokai Patea Services s9(2)(a)  
**Sent:** Monday, 8 December 2025 11:25 am  
**To:** sikaHOSIHMP; Dave Carlton; Moana Smith-Dunlop  
**Cc:** Barbara Ball; Admin | Mokai Patea Services  
**Subject:** SIKA HOSI Submission on behalf of MPWCT  
**Attachments:** MPWCT HOSI Plan submission.docx

**Categories:** Green Category

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Kia ora koutou,

Please find attached the 'Mōkai Pātea Waitangi Claims Trust Sika Herd of special interest (HOSI) submission' on behalf of the Mōkai Pātea Waitangi Claims Trust chair.

Mihi Maioha  
Nataria Lucas-Payne | Pou Iwi | Mokai Patea Services  
130 Hautapu Street Taihape  
4720  
s9(2)(a)



**Department of Conservation**

To: [sikahosihmp@doc.govt.nz](mailto:sikahosihmp@doc.govt.nz), s9(2)(a)

s9(2)(a)

Tena koutou

**Mōkai Pātea Waitangi Claims Trust submission on the Sika Herd of Special Interest (HOSI) proposal**

This submission is presented on behalf of the Mōkai Pātea Waitangi Claims Trust (MPWCT). Our Trust's purpose is to collectively settle the claims of the four iwi against the Crown for breaches of Te Tiriti o Waitangi in the Mōkai Pātea rohe. Our Trust was established by the four Rūnanga representing the four iwi of Mōkai Pātea:

- Ngāi Te Ohuake,
- Ngāti Hauti,
- Ngāti Tamakōpiri and
- Ngāti Whitikaupeka.

The MPWCT has an interest in the Sika HOSI proposal as it covers areas within the tribal domains of both Ngāti Tamakōpiri and Ngāti Whitikaupeka, and also adjoins Māori-owned and administered whenua in our rohe.

The MPWCT has the following comments on the Sika HOSI proposal:

1. We seek assurances that the proposal does not impact on DoC's Treaty obligations with our Trust and our affected Iwi under section 4 of the Conservation Act
2. We are keen to understand whether and how the proposal will impact any of the arrangements - including the potential return of DoC whenua – that we are seeking to negotiate with DoC as part of our Treaty settlement negotiations
3. If the Sika HOSI proposals are enacted, then the MPWCT expect to be kept regularly updated by DoC on the proposals, especially as they relate to our ongoing settlement negotiations.

We are aware that our affected iwi and land trusts are also providing submissions, and we also support their submissions and recognise our individual and collective interests in this kaupapa.

Ngā mihi,

na

Barbara Ball

Mōkai Pātea Waitangi Claims Trust Chair

# Tim Barke - Westervelt NZ

Submission Details

## Eirwen Harris Mitchell

---

**From:** Tim Barke s9(2)(a)  
**Sent:** Friday, 28 November 2025 10:40 am  
**To:** sikaHOSIHMP  
**Cc:** s9(2)(a)  
**Subject:** Sika Herd of Special Interest - Westervelt submission  
**Attachments:** 251126 Westervelt Submission in relation to Sika Herd of Special Interest Draft Herd Management Plan.pdf

**Categories:** Green Category

You don't often get email from tim@westervelt.co.nz. [Learn why this is important](#)

Kia ora DOC wild animal management team,

Please find attached Westervelt NZ's submission in support of the proposal of the Draft Herd Management Plan designating Sika in the Central North Island as a Herd Of Special Interest.

If you have any questions related to this submission, please feel free to contact me.

Ngā mihi,  
Tim

### Tim Barke

General Manager, New Zealand

**Mobile**

**Email**

**Address**

**Post**

**Web**

s9(2)(a)

s9(2)(a)

Westervelt Company NZ Ltd, 2/86 Ruapehu Street, Taupo, 3330 (Upstairs from Torpedo 7)  
PO Box 1941, Taupo 3351, New Zealand  
[www.westervelt.com](http://www.westervelt.com)

# **Submission in relation to Sika Herd of Special Interest Draft Herd Management Plan**

Submitter: **The Westervelt Company New Zealand Ltd**

The submitter is agreeable to being named in relation to this submission.

## **Background**

The Westervelt Company has owned Poronui Station since 2007. Poronui is closely involved with the sika herd of the Central North Island. Poronui was the site of the original liberation of sika and has been central to the herd since that time. Westervelt is well aware of the issues surrounding sika deer as it provides high quality hunting experience to clients of its sporting lodge while managing the potential conflicts with its farming, forestry and conservation priorities.

## **The Westervelt Company Supports the Draft Herd Management Plan**

### **Rationale**

The plan recognises the significant value provided by the sika herd of the Central North Island.

We acknowledge that there is an issue with the management of deer numbers. The increase in numbers is not good for conservation values, herd health and ultimately hunting opportunity and experience. The uncontrolled increase in deer numbers on conservation land has impacted neighbouring private land.

In recognising the value of the sika herd the plan creates the opportunity for hunters to be involved in herd management which is a significant win-win for both conservation and hunting. The current situation is the worst possible regime, conservation values are suffering, and hunters are totally disenfranchised. A structured approach as proposed by the plan enables constructive input from hunters which must be better than the do nothing approach currently being followed.

The plan also creates a framework where it is possible for hunters to contribute to conservation. The experience of the Wapiti Foundation and more locally the Sika Foundation has illustrated how these groups, once enabled, can provide significant gains for conservation.

The current state where we see declining herd quality, hunter experience and conservation values shows the do-nothing approach does not work.

Intervention is required to achieve the necessary change in animal numbers. Hunters have consistently shown that they are the most invested party in these situations and most likely to contribute to a pragmatic solution. The draft plan provides a mechanism to do just this.

The adaptive management approach promoted within the plan is supported. This is sensible given the complex nature of the management issues being faced.

Introducing the herd of special interest for sika deer is logical. The herd has demonstrated that with proper management the herd is capable of producing international quality trophies and a premier hunting experience. While hunters on their own cannot effectively control deer numbers they will make a contribution either directly through their own activities or indirectly through coordinated animal control activities.

### **Issues**

- 1. Failure to include significant neighbouring landowners as a fundamental component of the draft plan**

The lack of recognition and involvement of significant neighbouring landowners in the management plan is a serious omission that impacts the ability of the plan to achieve a successful outcome.

#### **Recommended Change to the plan**

Inclusion of a specific additional strategy:

*Work closely with significant private landowners adjoining the herd management area to manage sika.*

*In addition, significant private landowners are recognised as key partners and relationships relevant to the plan*

#### **Rationale**

Landowners adjoining conservation land within the sika management area are inextricably linked to the sika herd even if only because they are impacted by the movement of deer on to their land or equally that conservation land may be affected by deer moving from private land.

More importantly though, several private landowners, including Poronui, have made significant efforts to manage the sika herd on their properties. Management activities including research and animal control have enabled a healthy herd that produces quality trophy animals while managing conflicts with other activities on their land including farming, forestry and conservation.

It would be short sighted to ignore the views of these landowners and a significant opportunity to enhance sika lost if they were effectively excluded from the management process.

#### **2. Inadequate funding provisions**

The success of the plan relies on the ability to substantially reduce sika numbers. This is beyond the ability of private hunters and will require controlled management shooting which is expensive. The plans only reference to funding is strategy **4.2.1 “Seek to develop partnerships and commercial opportunities associated with sika to help meet the costs of implementing this Plan.”**

Given that the success or failure of the plan will likely rely on funding this aspect of the plan should be elevated in priority and should actively consider all opportunities to meet the funding requirements of the plan.

#### **Recommended Change to the plan**

Amend strategy 4.2.1 by creating a separate Strategy specific to Resourcing. Expand the scope of the strategy to include the proactive identification of funding opportunities to meet the requirements of the plan.

# Ian Barraclough

Submission Details

## Emma Bennett

---

**From:** IAN Barraclough [s9(2)(a)]  
**Sent:** Friday, 21 November 2025 9:28 am  
**To:** sikaHOSIHMP  
**Subject:** HOSI submission  
  
**Categories:** Green Category

[You don't often get email from [s9(2)(a)] Learn why this is important at <https://aka.ms/LearnAboutSenderIdentification> ]

Kai Ora,

I would like to you to consider changing the amendments to whats currently being under taken by the Sika Foundation in conjunction with Doc to the management of the Sika herd under HOSI

### 1. Procedural Integrity and Absence of Pre-Operational Consultation

The implementation of significant population-level interventions in the Kaimanawa Remote Experience Zone (REZ) prior to public or hunter consultation represents a breach of fundamental adaptive-management principles.

Standard wildlife-management frameworks require:

Early-phase stakeholder engagement  
Transparent objective setting and  
Co-design of monitoring and performance indicators before any manipulative control is undertaken.

Initiating aerial culls and sex-selective harvest in the absence of these components reduces system transparency, introduces bias into subsequent monitoring, and undermines the legitimacy of the proposed HOSI framework.

A scientifically defensible management model cannot be retrofitted to justify actions taken before the public process.

### 2. Population Dynamics: High Risk of Demographic Collapse Under Hind-Selective Harvest

Hind-dominant harvest disproportionately affects high-elasticity age classes.

#### 2.1 Elasticity and Sensitivity Analysis

In ungulates, the elasticity of  $\lambda$  (finite rate of increase) is highest for:

- \* Adult female survival ( $S_a$ ), and
- \* Prime-age female fecundity ( $F_a$ ).

Therefore, reductions in  $S_a$  or  $F_a$  generate \*super-linear declines\* in  $\lambda$  relative to equivalent reductions in male age classes.

For Sika, conservative modelling suggests:

- \* A 10% reduction in hind survival often produces >20–30% reduction in  $\lambda$ .
- \* Equivalent male-biased harvest may only reduce  $\lambda$  by <5%.

Thus, hind-dominant culling is an inherently high-risk intervention unless justified by robust, peer-reviewed ecological evidence.

## 2.2 Destabilisation of Age Structure

Selective removal of hinds in a semi-permeable system accelerates:

- \* Loss of prime-age females
- \* Declining fawn recruitment
- \* Increased variance in cohort strength
- \* Time-lagged demographic collapse

Because ungulate populations rely on “cohort buffering,” hind removal reduces the system’s ability to absorb environmental shocks.

## 2.3 Genetic and Phenotypic Consequences

Hind-selective harvest narrows:

- \* Effective population size ( $N_e$ )
- \* Genetic variance in maternal behaviour
- \* Dispersal phenotype diversity
- \* Fine-scale habitat selection traits

This weakens long-term adaptive capacity, contradicting the stated intent of producing a healthy, sustainable, high-quality herd.

## 3. Permeability of the REZ: 58+ km Boundary Creates a Structural Management Failure

The REZ boundary is not a closed ecological system. More than 58 km of its margin directly borders:

- \* Private lands,
- \* Iwi-owned whenua, and
- \* New Zealand Defence Force training areas.

This landscape configuration invalidates any assumption that the REZ functions as an isolated or self-contained population unit.

### 3.1 Source–Sink Metapopulation Dynamics

The REZ, following internal culling, behaves as a sink patch while surrounding lands act as source patches. This leads to:

- \* Persistent inward dispersal
- \* Rapid recolonisation following culling
- \* Density-driven immigration of young animals

Under classical Hanski-Levins metapopulation models, a sink patch cannot be stabilised by local removal unless source populations are simultaneously managed—something that is not occurring.

### 3.2 Edge Permeability and Dispersal Pressure Long, irregular boundaries increase:

- \* Edge-to-area ratios
- \* Permeability coefficients
- \* Dispersal frequency
- \* Movement of subadult classes

This creates a vacuum effect where animals from adjacent lands refill the REZ faster than culling can suppress numbers.

### 3.3 Impact on Data Validity

Permeability undermines the reliability of:

- \* Index-based animal counts
- \* Vegetation response monitoring
- \* Pre- vs post-control comparison metrics
- \* Trend-line interpretation

Any conclusions drawn from vegetation response in a non-sealed unit carry a high risk of false attribution because animal pressure cannot be stabilised long enough to measure true ecological signal.

## 4. Multi-Species Pressure: Hares as a Major Untreated Disturbance Agent

The current management narrative disproportionately attributes ecological stress to Sika, without integrating the well-documented impacts of hares (*Lepus europaeus*)

### 4.1 Competitive and Cumulative Impact Effects

Hares impose substantial browsing pressure in:

- \* Frost-flat systems
- \* Subalpine grasslands
- \* Tussock communities
- \* Herbfields
- \* Seedling recruitment zones

Their impacts include:

- \* High removal rates of palatable seedlings
- \* Suppression of key indicator species
- \* Browsing in sensitive regeneration niches
- \* Quantitative masking of deer impacts in monitoring data

### 4.2 Monitoring Model Breakdown

Ignoring hare impacts violates the assumptions of any vegetation-browse model that attempts to attribute damage solely or primarily to deer.

Under multi-pressure systems, the monitoring equations require:

- \* Multi-species browse attribution
- \* Species-specific utilisation curves
- \* Combined pressure modelling

Without these components, vegetation monitoring generates structural bias that can be misinterpreted as evidence of excessive deer density.

#### 5. Recommendations for a Scientifically Robust HOSI Framework.

1. Mandatory early-phase public and hunter consultation prior to any future large-scale culling or herd-structure interventions.
2. Immediate cessation of hind-dominant culling unless justified by transparent, peer-reviewed ecological data and demographic modelling.
3. Integration of cross-boundary management agreements with iwi landowners and NZDF to address source–sink dynamics.
4. Inclusion of hare population monitoring and impact modelling in all ecological assessments.
5. Adoption of co-design governance including hunters, iwi, and scientific advisors, in monitoring, modelling, and decision-making processes.

#### Conclusion

The current management approach suffers from four critical failures:

1. Procedural and consultation deficiencies
2. High-risk demographic manipulation through hind-focused culling
3. Invalid ecological modelling due to REZ boundary permeability
4. Omission of hare impacts despite their significant ecological footprint

For the HOSI to be scientifically credible, ecologically robust, and socially legitimate, the above issues must be addressed explicitly in the final plan.

I support the creation of a Sika HOSI only if these conditions are incorporated.

Nga mihi  
Ian Barraclough

s9(2)(a)

# Craig Benbow

Submission Details

## Eirwen Harris Mitchell

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**From:** Craig Benbow s9(2)(a)  
**Sent:** Monday, 8 December 2025 9:51 am  
**To:** sikaHOSIHMP  
**Subject:** Sika HOSI draft HMP submissions  
**Attachments:** Sika Plan Submission.pdf

**Categories:** Green Category

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Please find attached my submission on the draft herd management plan for the proposed Sika Herd of Special Interest to be established in Central North Island.

Kind regards,

Craig Benbow

# Sika Herd of Special Interest Draft Herd Management Plan: Submission

From Craig Benbow, Past National President, New Zealand Deerstalkers Association Inc.  
Chair NZDA - Game Animal Management Committee

## To the Department of Conservation,

Thank you for the opportunity to submit on the Sika Herd of Special Interest Draft Herd Management Plan (HMP). I support the designation of the Sika Herd as a Herd of Special Interest (HOSI) as it provides the first statutory recognition of a valued introduced species and its management for hunting values while delivering conservation outcomes.

I urge the Minister to approve the HOSI designation only on the condition that key amendments are made to the objectives and strategies to ensure the plan remains focused on adaptive, hunter-led management as intended by the Game Animal Council Act 2013.

My support for the HOSI is strengthened by my direct experience and observation of part of the forest ecosystem. My visit to the Sika Area revealed signs of long standing forest degradation and changes to the under-storey that are documented impediments to forest viability into the future. To my mind this reinforces the urgent need for a new, effective management system. The current system is failing conservation and does not adequately support game animal management. The HOSI framework, with its adaptive management, offers a highly effective alternative to protect and enhance both herd and conservation values.

## Proposed Amendments to Objectives

The Herd Management Plan must be an instrument to implement HOSI under the Game Animal Council (GAC) Act, which requires a values-based approach, not solely a control management approach. The objectives should be clearly linked to the management activities and monitoring, with feedback loops to allow for adjustment.

### Objective 1: Ecological Outcome (Oppose/Seek Amendment)

- **Draft wording:** *“Sika are managed in a manner that allows for the maintenance of forest ecosystem processes, including canopy regeneration, and protects threatened species and their habitats.”*
- **Position: Oppose** this wording. This objective is considered too broad, lacks specificity, and is impractical, making it difficult to achieve in relation to the specific management of the Sika herd. Given this wording is subject to interpretation I do not support it as described.
- **Recommended amendment:** Replace Objective 1 with a statement that sets a measurable baseline for vegetation and relates directly to the impact of the managed Sika herd:

"Maintain or enhance the current health of forest vegetation, including canopy regeneration and threatened species that can be adversely affected by sika browse, through management of the sika herd".

### **Objective 3: Funding and Self-Sustainability (Support with Amendment)**

- **Draft wording:** *"Seek to generate in kind support, and revenue through partnerships and sponsorships, to contribute to the cost of delivering this Plan."*
- **Position: Support with Amendment.** The objective must be more definitive about the HOSI's independence and financial sustainability.
- **Recommended Amendment:** Rephrase to clearly aim for a self-funded model: "Generate sufficient revenue through partnerships and sponsorships, seek to recover costs from the hunting community, and in-kind support is increased to ensure the delivery of this plan is wholly or largely self-funded".

## **Proposed Amendments to Strategies**

### **Strategy 2.1(a)(iv): Ecological Monitoring (Oppose)**

- **Draft wording (Monitoring methods include):** *Faecal pellet counts.*
- **Position: Oppose** the mandatory inclusion of faecal pellet counts. This method is costly, both in terms of data collection but also in analysis, and often does not directly correlate with the actual or potential ecological impact of deer on the environment. I question the contributing value for an efficient, adaptive management framework. Monitoring should be efficient and effective and focused on the actual impact of deer.

### **Strategy 5.1: Annual Operational Plan (Support with Clarification)**

- **Draft wording (Strategy 5.1):** *Develop an annual operational plan for the activities planned for the coming year to help achieve the objectives.*
- **Position: Support**, but clarify the purpose. The operational plan must serve as a flexible, adaptive management tool developed by the implementer (the Sika Foundation), separate from the Herd Management Plan. The HOSI presents a valuable opportunity to not only manage sika but also to advance deer control techniques in New Zealand. The plan should enable adaptation and the operational plan developed in response to learnings or goals attained/not attained.

### **Strategy 5.4: Annual Report Review (Oppose)**

- **Draft wording:** *Work with the Department when preparing the annual report prior to its finalisation and public release.*

- **Position: Oppose** this requirement. This provision potentially introduces unnecessary oversight bureaucracy, (this judgement comes from a long period of observation) that could hinder the efficiency and effectiveness of the plan's implementation. The Sika Foundation, as the likely day-to-day implementing body, should have the autonomy to finalize and release the operational report to maintain efficiency and accountability. I believe there is a real conflict in this proposed strategy. HOSI is not a partnership that can be both taxed or championed by DOC to provide public relations material or any other reporting the department may need to provide. The Sika foundation must be both charged with providing an informative data and evidence based report and being allowed the autonomy to do so with no interference in its operations.

### **Key Focus Areas for HOSI Success**

My submission stresses that the HOSI model must be empowered to succeed where the status quo has failed:

1. **Herd Management Plans are Prototypes:** This HMP is one of two new plans trialling a new approach to managing valued introduced species and must be treated as such. They will be found wanting and will need a lot of adaptation. This HMP is not the end solution and capturing the experimental nature of these plans clearly so all parties avoid being locked into a deficient plan must be a priority to the Minister.
2. **Hunter Autonomy and Control:** The success of the HOSI requires enabling hunter and community-led management and positive outcomes. The plan must recognise the value of hunting supports a wide range of values (physical health and wellbeing, connection to the natural environment, a sustainable source of food for communities and families, social connections, and community engagement).
3. **Adaptive Management:** The HMP must enable the management approach to shift as needed based on clear monitoring results to achieve the objectives. This will ensure better conservation outcomes than the status quo.
4. **Values Recognition:** Hunters are passionate conservationists and provide valuable "boots on the ground" conservation effort. This effort should be recognised and enabled.

# Jeffrey Benson - OSPRI

Submission Details

## Eirwen Harris Mitchell

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**From:** Jeffrey Benson s9(2)(a)  
**Sent:** Monday, 8 December 2025 11:42 am  
**To:** sikaHOSIHMP  
**Cc:** s9(2)(a)  
**Subject:** OSPRI HOSI Submission  
**Attachments:** OSPRI HOSI Submission.pdf  
  
**Categories:** Green Category

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Dear Department of Conservation Team,

Please find attached OSPRI's submission regarding the Herds of Special Interest Consultation currently underway.

If you have any questions or require further clarification, please don't hesitate to get in touch.

Kind regards,  
Jeff

**JEFFREY BENSON**

PRINCIPAL ADVISOR, VECTOR CONTROL

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**OSPRI New Zealand Limited**

Unit 3, 10 Matai Street, PO Box 1811, Taupo 3351

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2/12/2025

Department of Conservation,  
Sika HOSI draft HMP submissions  
By email - sikahosihmp@doc.govt.nz

## **Submission on Proposed Sika Herd of Special Interest Management Plan**

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### **1. Introduction and Purpose**

OSPRI welcomes the opportunity to submit on the proposed Sika Herd of Special Interest Draft Herd Management Plan. We recognise the importance of hunting and conservation values and are committed to working alongside DOC, iwi, and the hunting community to achieve shared outcomes.

OSPRI is a not-for-profit organisation responsible for delivering New Zealand's TBfree programme under the Biosecurity (National Bovine Tuberculosis Pest Management Plan) Order 1998 (NPMP) made under the Biosecurity Act 1993 (Biosecurity Act). The NPMP sets out the legal framework and obligations for eradicating bovine tuberculosis (TB), from New Zealand. OSPRI is the parent company of TBfree NZ Limited (TBfree), is the management agency responsible for implementing the NPMP and does so through wildlife and livestock disease management.

We are submitting because sika deer live within the Kaimanawa and Kaweka ranges, which are classified vector risk areas under the NPMP. Effective TB management in these areas depends on proven control methodologies, including aerial application of 1080 for possum control.

### **2. Role of Deer in TB Management**

While possums are the wildlife vector for TB, feral deer can become infected and act as spillover hosts, sustaining disease in the environment and increasing transmission risk to livestock. In vector risk areas, reducing TB prevalence requires integrated control of possums. Any management plan for deer should therefore complement, not conflict with, TB eradication objectives under the NPMP.

### **3. Legal Relationship Between HOSI and the bovine TB NPMP**

We note that the designation of a Herd of Special Interest does not override the Biosecurity Act or the provisions of the National Pest Management Plan (NPMP).

This means herd management plans under the Game Animal Council Act, must be consistent with national pest management plans, and not prevent or inhibit the exercise of powers under the provisions of the Biosecurity Act and NPMP.

As such, the HOSI classification does not restrict TBfree's statutory powers or obligations under the Biosecurity Act and NPMP. However, as canvassed below we believe there is a risk that the public may interpret the designation of a Sika Herd of Special Interest as conferring a level of protection that prevents sika from being affected by pest control operations.

### **4. Importance of Aerial 1080 Control**

Aerial 1080 is the only proven effective and efficient method for controlling possums in rugged, forested terrain such as the Kaimanawa and Kaweka ranges. Currently, without this tool, TB eradication in the Kaimanawa and Kaweka Ranges would not be feasible.

## 5. Risk of Misinterpretation and Public Perception

There is a risk that the public, including hunters and other stakeholders, may interpret the designation of a Sika Herd of Special Interest as conferring a level of protection that prevents sika from being affected by pest control operations. This misunderstanding could arise because the plan emphasises managing sika for hunting purposes and improving herd quality, which some may assume means these animals are safeguarded from impacts associated with aerial 1080 use.

If this perception takes hold, it could lead to:

- Conflicting expectations among hunters and conservation groups, where some may assume that herd management plans override statutory pest control obligations.
- It may further entrench opposition to aerial 1080 use in the Kaimanawa and Kaweka ranges, despite its critical role in TB eradication.
- Legal challenges or public campaigns aimed at restricting pest control operations, creating delays and additional costs for NPMP implementation.
- Reduced confidence in TBfree and DOC programmes, undermining public trust in biosecurity and conservation efforts.

### Mitigation Measures:

The Sika plan should include clear, unambiguous statements that:

- NPMP requirements under the Biosecurity Act must be observed as a priority and is given preference over herd management objectives where necessary.
- Necessary TB management activities, including aerial 1080 operations, will continue where required to meet eradication targets, in coordination with stakeholders such as OSPRI, DOC, iwi and the hunting community
- Herd management activities will be coordinated to complement, not conflict with, NPMP implementation.

## 6. Consistency Across All Herds of Special Interest

While this submission focuses on sika, the same principles apply to Wapiti and any future herds of special interest. None of these plans should compromise NPMP implementation or TB eradication objectives. OSPRI welcomes the opportunity to work with the department on any future HOSI management plans that are being prepared.

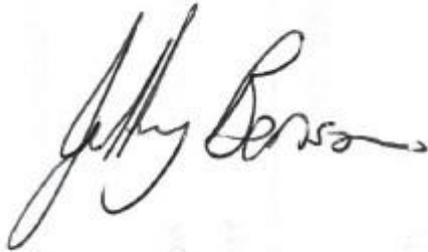
## 7. Commitment to Collaboration

OSPRI is committed to working closely with the Department of Conservation, the Sika Foundation, the wider hunting community, iwi and other stakeholders to ensure that the Sika Herd of Special Interest plan and the TB NPMP are aligned. We support a collaborative approach that delivers conservation, hunting and biosecurity outcomes.

## Recommendations

1. Include clear wording in the Sika Herd of Special Interest plan stating that NPMP requirements under the Biosecurity Act take precedence.
2. Confirm that aerial 1080 and other approved pest control methods will continue where necessary to meet TB eradication targets.
3. Establish a collaborative framework between DOC, OSPRI, iwi and hunting groups to align herd management with TBfree objectives.
4. Apply these principles consistently to all current and future herds of special interest

Kind Regards

A handwritten signature in black ink, appearing to read "Jeff Benson". The signature is written in a cursive style with a long horizontal stroke at the end.

Jeff Benson

Principal Advisor, Vector Control

# Helen Brosnan - New Zealand Fish and Game

Submission Details



**8 December 2025**

Email response to: [sikahosihmp@doc.govt.nz](mailto:sikahosihmp@doc.govt.nz)

Consultation closing 8 December 2025

Regarding: [Draft herd management plan for proposed Sika Herd of Special Interest](#)

**Re: Letter of Support for the Game Animal Council Submission on the Draft Herd Management Plan for Proposed Sika Herd of Special Interest**

### **Executive Summary**

Fish & Game supports the key points made by the GAC in its Executive Summary, particularly that:

1. The draft HMP does not meet the intent or requirements of the Game Animal Council Act 2013 (GAC Act) and instead resembles a Wild Animal Control Plan focused on suppression or eradication.
2. A sustainable, values-based and adaptive management framework is required, not a control-based one.
3. The current draft creates legal, operational, and practical risks because it constrains the GAC's ability to perform its statutory functions—especially its duty to achieve *effective herd management*.
4. Substantial revision is required to ensure the HMP is both legally compliant and fit-for-purpose, and to enable long-term, high-quality recreational hunting opportunities while protecting conservation values.

Fish & Game New Zealand welcomes the opportunity to provide this letter of support for the Game Animal Council's (GAC) submission on the Draft Herd Management Plan (HMP) for the Sika Herd of Special Interest (HOSI).

As a statutory body charged with managing sports fish and game birds and advocating for public recreation and environmental values, we have a strong interest in ensuring that New Zealand's resource management frameworks including those relating to game animals are robust, legally sound, and support sustainable outdoor recreation. The establishment of Herds of Special Interest was a significant step forward in recognising that some introduced species have high recreational value and can be managed in ways that also support wider conservation objectives. Ensuring that the first HMP developed under this framework is appropriately structured and legally compliant is critical.

We acknowledge the considerable effort the GAC has made to provide expert, constructive input throughout the development of the HMP and strongly support the concerns raised in their submission. Our views align closely with the GAC's position, particularly regarding the need for the Sika HOSI HMP to reflect the intent, statutory purpose, and management philosophy of the Game Animal Council Act 2013 (GACA), rather than the Wild Animal Control Act 1977 (WACA).

Fish & Game New Zealand appreciates the opportunity to comment on the Draft Herd Management Plan (HMP) for the Sika Herd of Special Interest (HOSI). We provide this letter in strong support of the submission lodged by the Game Animal Council (GAC), and endorse both the concerns raised and the solutions recommended.

Fish & Game shares the GAC's commitment to ensuring that the Sika HOSI is managed lawfully, sustainably, and in a manner that recognises both the hunting values that underpin the HOSI designation and the conservation responsibilities associated with public conservation land. In our view, the GAC submission represents a careful, well-reasoned, and legally robust analysis of the draft HMP.

## **Our Submission**

### **1. Effective herd management must be the organising principle of the HMP**

Fish & Game strongly supports the GAC's position that the HMP must be grounded in the statutory requirement to manage the herd *for hunting purposes* in a manner consistent with the overriding considerations. As the Council notes, an HMP binds the GAC, and therefore must be compatible with the GAC's functions under s7, including:

- undertaking management functions compatible with conservation land management, and
- exercising powers for *effective herd management*.

We agree that the draft HMP does not currently enable this and instead risks preventing the GAC from fulfilling its statutory mandate. A plan that directs suppression or eradication is simply incompatible with the purpose of designating a Herd of Special Interest.

### **2. The HMP must adopt a values–objectives–strategies hierarchy**

Fish & Game supports the GAC's statement that the current plan lacks a logical chain of reasoning that connects values to objectives and strategies. This absence creates internal inconsistency and undermines the defensibility of the HMP.

We support the recommended structure where:

- **Values** provide the mandate;
- **Objectives** articulate the outcomes; and
- **Strategies** deliver those outcomes and embed adaptive feedback loops.

This approach is consistent with modern wildlife and natural resource management practice and is essential for a HOSI management framework intended to be durable, transparent, and grounded in evidence.

### **3. The HMP must not embed control-based language or prescriptive operational metrics**

Fish & Game supports the GAC's concern that the draft plan adopts terminology from the Wild Animal Control Act—such as “control targets” and “professional control operations”—that are not appropriate for a herd managed for hunting purposes.

Moreover, embedding fixed sex ratios, fixed population targets, or prescriptive monitoring methods inside a statutory document undermines adaptability. These matters belong in annual operational plans, not in a five-year governance-level plan.

This is a key weakness of the draft HMP, and we strongly endorse the GAC's recommended corrections, including the removal of control-based language and the establishment of a genuine adaptive management framework.

### **Additional Fish & Game Perspective**

Fish & Game also reinforces the following points:

- Hunters, iwi, Fish & Game licence holders, and local communities all rely on long-term, stable management frameworks. A values-based HMP is essential to secure social licence and collective stewardship.
- A sustainable herd that produces high-quality recreational hunting experiences aligns with conservation outcomes. Healthy populations require healthy habitats; valuing the herd therefore incentivises protecting ecosystems.
- True adaptive management is essential. The HMP must contain high-level strategies only, while technical protocols (monitoring methods, thresholds, data analysis) should be part of a separate Adaptive Management Plan as proposed by GAC.

The GAC's recommended structure achieves all of these objectives and should be adopted.

## Conclusion

Fish & Game supports the GAC in urging the Department of Conservation to substantially revise the Draft Sika HMP. As drafted, the plan is not aligned with the GAC Act, does not facilitate sustainable herd management, and does not reflect the purpose of the HOSI framework.

Adopting the changes proposed by the GAC will allow for a legally compliant, balanced, and adaptive management plan that:

- upholds conservation values,
- provides enduring, high-quality hunting opportunities,
- ensures transparent and defensible decision-making, and
- supports constructive partnerships with iwi, hunters, Fish & Game, landowners, and the wider community.

Fish & Game New Zealand is committed to working collaboratively with the GAC, DOC, and tangata whenua to ensure the final HMP reflects best practice and the legislative intent of the GAC Act.

We acknowledge the value of the Sika herd to New Zealand's hunting community and the wider public, and we believe the GAC's proposed approach will deliver long-term benefits for conservation values, recreational hunting, and public confidence in the management system.

Fish & Game looks forward to continued collaboration with the GAC and DOC in the development of high-quality management frameworks for game animals and recreational access across public conservation land.

We are available to discuss the content of this submission further if you have any questions.

## Contact Details

Richie Cosgrove

E: s9(2)(a)

P: s9(2)(a)



on behalf of  
Richie Cosgrove, COO  
New Zealand Fish and Game Council

**Attachments**

Attachment 1 – About Fish and Game

## About Fish and Game

- 1.1 Fish and Game is the statutory manager for sports fish and game, with functions conveyed under the Conservation Act 1987. The organisation is an affiliation of 12 regional Councils and one national Council. Together, these organisations represent approx. 130,000 anglers and hunters.
- 1.2 The sports fish and game resource managed by Fish and Game are defined and protected under the Conservation Act and the Wildlife Act 1953. The species within include introduced sports fish and a mix of native and introduced waterfowl and upland game<sup>1</sup>.
- 1.3 Our vision, purpose and values are illustrated below:

<b>OUR VISION</b> Our vision is a New Zealand where freshwater habitats and species flourish, where hunting and fishing traditions thrive and all Kiwis enjoy access to sustainable wild fish and game resources.	<b>OUR PURPOSE</b> Fish & Game New Zealand maintains and enhances sports fish and game birds, and their habitats, ensuring access for current and future generations of New Zealanders.	<b>OUR VALUES</b> <b>TRUST</b> <b>INCLUSION</b> <b>CONNECTION</b> <b>SERVICE</b>
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- 1.4 Fish and Game is entirely funded by licence holder fees and private contributions, meaning the delegated function of managing the species for the public good is funded entirely by the users. It is a democratic '*user pays, user say*'s organisation. Using this system, Fish and Game funds public good research to ensure fisheries and game populations are managed sustainably; undertakes compliance with the licencing system; and contributes to public planning processes to ensure that hunters and anglers values are recognised and provided for.
- 1.5 In relation to planning, Fish & Game have the statutory function to advocate for hunters and anglers values and ensure that the habitats of gamebirds and sports fish are provided for. At any one time we may have around 150,000 licence holders, and a larger number (approximately 300,000) that are transient licence holders. The habitat we specifically advocate for includes lakes and rivers that contain trout and salmon (and other sports fish) and wetlands where game bird hunting occurs.

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<sup>1</sup> Most New Zealanders refer to these species as 'game birds', distinguishing them from other types of large game, such as deer or pigs. The Wildlife Act 1953 defines these birds simply as 'game' and this phrase is used in the context of this submission.

## **Fish and Game in Resource Management**

- 2.1 Fish and Game works to provide for the ongoing enjoyment of hunting and freshwater fishing assets, the maintenance (or enhancement) of public access to rivers, lakes, and wetlands for hunting and fishing, and the protection of the habitat of trout and salmon.
- 2.2 Hunting and angling require legal and physical access both to habitats and the resource itself. Maintenance and enhancement of access is critically important to the pursuits of our licence holders. The maintenance and enhancement of public access to and along lakes and rivers is listed in the RMA 1991 as a matter of national importance.
- 2.3 We see the opportunity for proposals to be required to provide improved access both to their sites and other nearby areas that involve hunting or fishing values as a form of mitigation for any loss of values on site. We seek that Fish and Game are consulted as an expert advisor where gamebird and or sports fishery values could be impacted. We can work with government officials to ensure outcomes that achieve both economic imperatives, along with recognising and providing for hunting and fishing values.
- 2.4 We specifically seek the protection of:
  - i. habitat of trout and salmon.
  - ii. maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers where sports fishing and game bird values exist.
  - iii. preservation of the natural character of the coastal environment (including the coastal marine area), wetlands, lakes and rivers and their margins where sports fishing and game bird values exist.
  - iv. Recognition and provision for freshwater angling/game bird hunting and amenity values.



# What does Fish & Game do?

**Who are we?** Fish & Game New Zealand manages, maintains and enhances sports fish and game birds and their freshwater habitats in the best long-term interests of anglers, hunters and all New Zealanders.

## Our vision

A New Zealand where freshwater habitats and species flourish, where game bird hunting and fishing traditions thrive and all New Zealanders enjoy access to sustainable wild fish and game resources.

## What we do

- Manage fishing and hunting regulations
- Conduct research to monitor fish and game bird populations
- Collaborate with communities to protect natural habitats
- Provide educational programmes and resources
- Advocate for valued habitats and species
- Negotiate and maintain access for anglers, hunters and all New Zealanders

**Together, let's ensure a thriving future for fishing and game bird hunting!**

[fishandgame.org.nz](http://fishandgame.org.nz)  
**#ReWild**



## What does Fish & Game do?

**Species management:** We monitor and survey species populations; set season regulations; and sustainably manage pressure on the resource.

**Habitat protection:** Advocate and take action to protect and enhance lakes, rivers, streams and wetlands; and secure 'national park' status to important rivers through Water Conservation Orders.



**Access and participation:** Negotiate and advocate so all New Zealanders can access our natural places; maintain access signage, information and brochures; organise fishing and hunting events and classes.

**Public awareness:** Maintain public advocacy; schools programmes; website and newsletters; community liaison; promote the right of licensed anglers and game bird hunters to pursue their chosen pastime.



**Compliance:** Recruit, train, equip and coordinate warranted rangers, to educate and enforce regulations to ensure the fish and game resource is sustained.

**Licensing:** Provide a nationwide licensing system with a range of licence categories and sales channels that makes it easy to buy a licence. We are solely funded by licence holders.



**Council:** Hold public meetings of elected licence holders to approve regulations and budgets, set policies and provide governance for the Fish & Game system.

**Coordination and planning:** Provide research, planning and reporting; financial management and general coordination across Fish & Game New Zealand.



[fishandgame.org.nz](http://fishandgame.org.nz) #ReWild

# Species we manage



Black Swan Kakianau



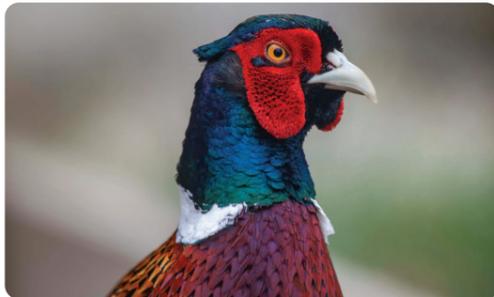
California Quail Koitareke



Mallard Rakiraki



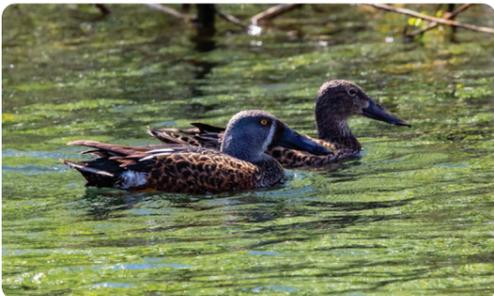
Paradise Shelduck Pūtakitaki



Pheasant Peihana



Pūkeko



Shoveler Kuruwhengi



Chukar



Grey Duck Pārera



Brown Trout



Rainbow Trout



Chinook Salmon



Sockeye Salmon



Brook Trout



Tiger Trout



Perch



Tench

# Jesse Bythell - New Zealand Plant Conservation Network

Submission Details

## Eirwen Harris Mitchell

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**From:** NZPCN President s9(2)(a)  
**Sent:** Monday, 8 December 2025 4:10 pm  
**To:** DOC Info; wapitiHOSIHMP; sikaHOSIHMP  
**Cc:** DLVC\_NZ PLANT CONSERVATION NETWORK (00)  
**Subject:** Submission from the New Zealand Plant Conservation Network on draft Herd Management Plans (Wapiti and Sika)  
**Attachments:** NZPCN\_Herd\_Management\_Plan\_HOSI\_bill\_submission\_FINAL.pdf  
**Categories:** Green Category

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Hello,

Please find attached our combined submission on both draft Herd Management Plans for Herds of Special Interest for Sika and Wapiti.

Regards,

Jesse Bythell  
(NZPCN President)



## **Environment Select Committee**

# **Wapiti Herd of Special Interest Draft Herd Management Plan and Sika Herd of Special Interest Draft Herd Management Plan**

### Introduction

1. The New Zealand Plant Conservation Network thanks the Environment Select Committee for the opportunity to make a submission on the Wapiti Herd of Special Interest Draft Herd Management Plans for both Sika and Wapiti .
2. *Rōpū hononga Koiora Taiao ki Aotearoa* the New Zealand Plant Conservation Network (NZPCN) was established in April 2003 and now has >1,000 members. The NZPCN's vision is that “the rich, diverse and unique plant life of New Zealand is recognised, cherished and restored.” We work to provide accurate, easily accessible information about indigenous plants and to foster conservation best practice. Our full strategy can be accessed [here](#). Our primary means of advocacy is via our website which contains factsheets describing both the introduced and native flora of Aotearoa New Zealand. Our website holds comprehensive information on plants and receives 1.8 million page views per year.
3. As per our submission to the Game Animal Council (Herds of Special Interest) Amendment Bill, the NZPCN strongly **opposes** the HOSI bill. We are submitting here to comment on the Draft Herd Management Plans for Sika and Wapiti.

### Summary of key points from the NZPCN submission

- Insufficient detail in Draft Herd Management Plans (DHMPs) for both Wapiti and Sika deer, such as no clear thresholds for ecosystem recovery.
- Lack of clarity in the Draft Herd Management Plans that indigenous biodiversity values will be prioritised over that of damaging, introduced species.
- Unnecessary law change - Community Management Plans are more appropriate mechanisms.
- Claims of low or neutral cost for Herds of Special Interest implementation
- Concern with how the Department of Conservation has framed this issue in the supporting document and social media promotion of this matter.
- Too much discretion for the Minister for Hunting and Fishing on how HMPs are to be enforced.
- Lack of transparency around monitoring data

- Lack of detail on how environmental awareness raising will be delivered and measured.

#### 4. Draft Herd Management Plans lack sufficient detail

We think the Draft Herd Management Plans (DHMPs) for both Wapiti and Sika lack sufficient detail, for example clear thresholds for ecosystem recovery are not stipulated. Adaptive management sounds good, but when no clear thresholds for recovery are set it is difficult to see if promises are kept.

Monitoring data from Fiordland show no significant ecosystem recovery in the wapiti area<sup>1</sup>. Although deer removal numbers have been somewhat increased as per the annual plans under the Community Management Agreement, the benefits seem to be negligible compared with unmanaged areas. We recognise measuring the relationship between deer density and ecosystem function and health is complex and deer move through the landscape seasonally, therefore affecting different habitats at different times. But the poor track record of ecosystem recovery and function within the Fiordland wapiti area is not encouraging. Without sufficient detail it is hard to see how the HOSI status and current draft management plans address this weakness.

To manage the herd for recreational hunting criteria without setting clear ecological objectives or deer density targets undermines claims that the designating Herds of Special Interest is going to have meaningful conservation gains - it is shifting the goalposts and then claiming victory.

We question why detail ecological recovery objectives are not included in the draft HMPs for comment.

We seek explicit reassurance that where necessary effective pest control operations, such as the use of 1080, will not be prevented in HOSI designated areas.

#### 5. Insufficient priority for indigenous biodiversity

We are concerned that the Herd Management Plans as drafted provide insufficient reassurance that indigenous biodiversity values will be prioritised over what are still legally defined as pest animals (e.g. sika and wapiti) within our national parks. It is unclear if there is a hierarchy of objectives or how intrinsic conflicts will be managed when the pursuit of one objective undermines the ability to achieve another. Objective 1, which is assessed based on vegetation monitoring may be undermined by Objective 2 which appears to be assessed from subjective experience reported by hunters.

We note that more than 20 indigenous plants are endemic to Fiordland and wapiti and deer affect many of these. For example, the alpine daisy *Celmisia holosericea* has recently had its conservation status upgraded from Not Threatened to 'At Risk – Declining' specifically due to the impact of ungulate browse<sup>2</sup>. Rakiura has more than 20 endemic plant species which would be

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<sup>1</sup> Whitehead et al. (2024) The effects of deer control on alpine plant browse in Fiordland National Park from 2006–2024. Manaaki Whenua Landcare Research. Contract Report: LC4545 prepared for the Department of Conservation.

<sup>2</sup>

put at further risk should a HOSI status be sought for white tail deer. Plants are not evenly distributed across the environment, and their specific habitat needs restrict where they can grow – our ecosystems and the species they support are not fungible.

We seek clarification that the objectives sit within a hierarchy and Objective 1 is prioritised.

## **6. Changing the law to protect introduced browsers is not conservation**

We question the need for a law change for hunters to undertaken conservation activities (including deer control) and we feel that, when they are prepared correctly and adhered to, Community Management Plans are more appropriate than designating a Herds of Special Interest.

We challenge any genuine conservation need to enact Herds of Special Interest inside national parks.

## **7. Claims about the cost of HOSI implementation**

We seek clarification on the claims about low costs or cost neutrality made by various parties including the Game Animal Council and Minister for Hunting and Fishing. The draft Herd Management Plans lack detail on exactly how work is paid for (e.g. vegetation monitoring). We note that the draft states Game Animal Council is bound by the HMPs – this organisation’s current annual funding of \$1.2 million comes from taxpayers.

If ecosystem monitoring is done to assess the effectiveness of HMPs implementation, is this cost to come out of the Department of Conservation’s already inadequate budget (currently 0.25% of government revenue).

A key part of the argument being put forward by proponents of HOSI is that it will not cost the taxpayer much and therefore has advantages over other ways of delivering deer reduction, yet when costs are not accurately reported it is not possible to meaningfully assess these claims.

What cost analysis has been done to estimate the resource demand for DOC staff liaising with groups regarding HOSI HMP implementation? Will all HOSI costs be included in annual reporting?

We submit that greater investment by government is needed in conservation in New Zealand and the solution

## **8. Framing of the issue**

We note that deer impact appears to be downplayed in the supporting document and the draft HMPs. Images used in social media to alert people to the opportunity to submit on this issue

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de Lange PJ, Gosden J, Courtney SP, Fergus AJ, Barkla JW, Beadel SM, Champion PD, Hindmarsh-Walls R, Makan T, Michel P. 2024. Conservation status of vascular plants in Aotearoa New Zealand, 2023. New Zealand Threat Classification Series 43. Department of Conservation, Wellington.

feature a cute hind and fawn images or a hunting dog, but fail to show the cost of ungulates to our native biodiversity.

Much emphasis is placed the value hunters have for sika and wapiti, but there is limited recognition of how highly our indigenous biodiversity is valued by the wider public. There seems to be no appreciation of the intrinsic values of our indigenous biodiversity.

The framing of only two opposing views, that deer are alien and should all be removed or that they are a valued game animal, is unhelpful and inaccurate. Most conservationists acknowledge that total removal of deer is not practical for areas like Fiordland yet still understand these introduced species are damaging and should be managed to the lowest practicable levels. Talk of healthy deer populations and healthy ecosystems is only realistic if deer levels are brought very low. Hunters who understand and value New Zealand ecosystems acknowledge this fact.

## **9. Ministerial discretion**

Reading the draft Herd Management Plan there is little reassurance that rigour will be applied, and HOSI status will be revoked if objectives are not achieved.

We submit that HOSI status automatically expires five years after designation unless extended by the Minister, and reasons for extension should be made public if objectives within the plans have not been achieved.

## **10. Transparency**

There is lack of clarity around who prepares the annual reports required by the draft Herd Management Plans. For example, is the Fiordland Wapiti Foundation to take the lead in preparing reports which include information provided by DOC or the other way around? We note some objectives in the plan are measured objectively (e.g. vegetation monitoring) and some objectives measured subjectively (e.g. hunter experience surveys).

We submit that all monitoring data should be available publicly and released when annual reports are published.

We submit that HMP annual plans should be made available to the public and, if relevant, failure achieve objectives should be made explicit in HMP annual reports.

## **11. References to education**

We note objectives to provide education opportunities for hunters and the wider community seem to lack any obligation to monitor effectiveness. It is one thing to make an educational opportunity available; it is quite another thing to achieve any increase in awareness amongst hunters and the wider public.

We seek clarification on how education awareness of the ecological impact of deer will be increased and whether this will be reported on.

**\*\*Submission ends\*\***

# Jenny Campbell

Submission Details

## Eirwen Harris Mitchell

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**From:** Jenny Campbell | s9(2)(a)  
**Sent:** Monday, 8 December 2025 4:25 pm  
**To:** wapitiHOSIHMP; sikaHOSIHMP  
**Cc:** Jenny Campbell  
**Subject:** Submission re HOSI Herd Management Plans  
**Attachments:** Game Animal Council ( Herds of Special Interest Management PLans,) 8 Dec 2025.docx

**Categories:** Green Category

You don't often get email from s9(2)(a) [Learn why this is important](#)

Kia ora e hoa ma, thank you for the chance to comment,

Rangimārie, Jenny Campbell

s9(2)(a)

Herds of Special Interest  
Submission on Herd Management Plans  
To whom it may concern at DOC.

From Jenny Campbell

s9(2)(a)

s9(2)(a)

s9(2)(a)

Co- convenor Coal Action Murihiku

s9(2)(a)

s9(2)(a)

s9(2)(a)

Kia ora e hoa ma.

**He iti, He pounamu**  
**It may be small but it is very precious**

Ko Oreti tōku awa  
Ko Takitimu tōku maunga,  
Ko Takitimu tōku waka  
Ko Ngāitahu tōku iwi  
Ko Te Rau Aroha tōku marae  
No Mossburn tōku kainga  
Ko Jenny Campbell ahau

I am speaking as Co-Convenor of Coal Action Murihiku ( CAM) along with personal perspectives.

He waka eke noa - We are all in this together.

This proposed plan for Herds of Special Interest shows little consideration for honouring and giving acknowledgment of Te Tiriti o Waitangi. Te Tiriti principles bring with them the essential need to fully consult with Maori and the kaupapa around solutions and understanding of our need to work together on a consultative basis, to preserve our unique endemic species, especially in our National Parks . Tangata Whenua’s long term wisdom from their lived

experience here as our first nation people must be valued as they will have their mana trampled on if Game Animal (Herds of Special Interest) are allowed to be 'farmed' there. This is particularly relevant regarding biodiversity along with the appreciation of the need to protect Te Ora o te Taioa, including our rivers, oceans, and land from the mountains to the sea as the habitats of our precious native species- our taonga.

Crown policy must give full effect to Te Tiriti in involving and consulting with Māori as well as measures to enable iwi, hapū and whānau to exercise their rangatiratanga and kaitiaki role in respect of taonga within their rohe especially when that includes National Parks ( NP) , in this particular case Fiordland NP in Ngāitahu iwi kaitiaki space, along with sika deer Herd of Special Interest (HOSI) in the Kaimanawa and Kaweka forest parks and Kaweka Conservation Area.

### **I strongly Oppose Herds Of Special Interest (HOSI)**

I strongly oppose these proposed Management Plans because they would turn our National Parks (NP) in to Game Parks. This goes completely against our need to preserve our unique native species of both plants & animals in Aotearoa in all our national parks. These were set up under the NP Act to do just that- not to encourage introduced species in to them intentionally eg Wapiti & Sika deer. We are bound by that Act to save the NP's from being turned into deer farms for trophy hunters.

We completely disagree with this Coalition Governments proposal to put trophy hunting and invasive introduced species, such as deer, especially Wapiti & Sika species, ahead of indigenous species in our precious NP's. There seems to be little recognition of the status of our NPs and that they belong to all of us, not just to a few whose plans are tantamount to wreck these special national taonga.

We need to take a stand for nature in our premier natural areas. NPs have been set aside to protect our indigenous plants and wildlife, alongside our spectacular landscapes, in their natural state.

We must ensure that public access to NPs isn't placed at risk and restricted by private hunting interests.

The Game Animal Council (Herds of Special Interest) looks to change that by removing fundamental protections in the National Parks Act to allow these so called 'herds of special interest' to be established in our NPs. This would be disastrous for our indigenous species- many of which are already on the brink of extinction. The intention of this plan is to change large parts of our NPs in to 'managed' hunting areas, especially for trophy hunting.

The Game Animal Council (Herds of Special Interest) Amendment bill **has been set up to** exempt a designated 'Herd of Special Interest' from the National Parks Act s 4(2)(b). Currently any exemptions to s 4(2)(b) require a determination from the New Zealand Conservation Authority ( NZCA). This would set a very dangerous precedent for our NPs. We would lose our social licence and respect we have around the world, by letting destructive, non- native species intentionally in to our NPs. Has ramifications for all national parks.

Our unique Fiordland and NPs are iconic places for tourism and international visitors. Visitors from both overseas and New Zealanders come to see eg kea, kākā and kākāriki and the plants and other native wildlife which make Aotearoa New Zealand unique and special. Making introduced species like wapiti & sika a priority over our native species in these NP natural habitats, puts our alpine and forest habitats and people's enjoyment of NPs, at risk.

The ngaere are not just here for this generation- they are there for future generations as well- for your & my mokopuna along with everyone else's descendents. That is our responsibility & introduced deer pests do not belong there. They are totally destructive of our native forests.

Deer know no boundaries as are obvious to those who live adjacent to native forests know about now. As they eat out the native forest they move out to adjacent land such as farms where they create havoc on pastures & crops. The farming community is already seeing this and cannot keep up with effective control. This is already a huge problem in Murihiku Southland. Pine plantations, planted as carbon sinks, are also being devastated by deer species.

### **Plan objectives:-**

These are vague, not discerning and are competitive- between ecological & hunting values. This is tragic & devastating for our ngahere native forest.

The plan lacks robustness and does not have clear overarching ecological objectives.

The plan lacks SMART ecological objectives which are key to adaptive management. The ecology should be paramount in those objectives. All the evidence points to deer wrecking our forests. This is starkly obvious when deer exclosures are studied. In contrast to the ngahere in the exclosure pen, the outside forest land is often very bare- showing the impact of deer grazing there. Deer not only eat foliage up to their maximum height, but they also eat tasty seedlings which will never get the chance to grow up to their mature size so no replacement can take place & we see forest collapse. They are our precious carbon sinks which we as a country are counting on to absorb our carbon emissions. Even if deer are removed at this stage it takes many year to restore those forests with shrubs, ferns, understorey and mature forest trees. These species are also the habitats for food, shelter, nests, ...of other endemic species which are often very vulnerable- so leading to their demise. Deer also rub their antlers on mature trees and strip bark off them- causing trees to die.

This is a very dangerous situation for our native forests as they are not able to replace themselves, the understorey is denuded and the bare soil is then very prone to slips, especially in these very steep mountainous landscapes. All the wild life in the soils is washed away so depleting those species & their essential habitats. The soils sediment then washes in to rivers and impacts water quality so affecting native fish species and other native freshwater species.

We as CAM members recognise that at even low numbers, invasive species like Sika deer and wapiti eat tonnes of native vegetation every day, which has adverse effects on New Zealand's native ecosystems. This can be easily seen when ex-closures show the marked difference inside compared to outside, as was mentioned above. Maintaining NPs in their indigenous state is an ecological bottom line that must be preserved. We wonder about what scientific & ecological evidence has been provided to support this HOSI plan being implemented.

Some national parks are UNESCO World Heritage Areas which are internationally recognised for ecological and cultural values eg Fiordland NP. This Plan if accepted will violate the fundamental principle of National Parks Act 1980. The HOSI plan ignores the threat of invasive species on native habitat in our internationally recognised UNESCO World Heritage Areas. Te Wāhipounamu Southwest New Zealand World (WHA) includes Aoraki Mount Cook, West Tai Poutini, Aspiring, and Fiordland National Parks. Te

Wāhipounamu Southwest New Zealand World Heritage inscription identifies invasive species such as deer, North American elk and tahr as a threat to world heritage values: Quote:

*Invasive species are the biggest impact on the property, despite their impacts being restricted to small areas of the property. Population increases of red deer as well as impacts from other browsing mammals such as wapiti, fallow deer, goat, chamois and tahr have caused severe damage in some parts of the property, in particular threatening the integrity of the forest and alpine ecosystems.*

This WHA is recognised as Aotearoa/ NZ's largest natural area and as the world's best example of the ancient biota of Gondwanaland. Tongariro NP is also WHA recognised for its cultural and ecological values. Invasive species are a known threat to world heritage values; their protection is not appropriate in a WHA. The bill ignores the known threat of invasive species in our world heritage areas.

Economic drivers must not over ride ecological bottom lines and NPs must be kept in their natural state. There is no economic imperative in the National Parks Act 1980. Ecological bottom line set out in the law should not be overridden by economic imperatives that enable trophy hunting. A Minister has made this statement for tourism as an economic driver:

*... and will allow hunter-led conservation groups to manage deer numbers in our national parks, creating opportunities for local hunters and tourism and driving more economic growth in the region.*

We see no evidence of this given to the committee to support this statement. NPs in their natural state underpin New Zealand's tourism viability.

It is well known that management led by hunters has not worked. Examples include the implementation of the Himalayan tahr control plan (1993) is failing. This is the model that is most similar to the kind of management plan which could be proposed for a Herd of Special Interest. In spite of agreed limits on population size and range, the management approach has meant that these limits have not been complied with (<https://www.doc.govt.nz/parks-and-recreation/things-to-do/hunting/what-to-hunt/tahr/tahr-and-conservation/>arrow\_outward See Population Monitoring Reports).

**Strategies are vague :-**

What are the annual plans as changes are seen in populations of deer- with effects on vegetation needing to be managed at least annually. Definite strategies should be listed & effective action taken, guided by effective & robust annual operational plans.

**Monitoring provisions;-**

**These** are inadequate and lack detail in the current operational plans.

**Poor enforcement provisions**

When these fail what will be done and who will do it? What happens? DoC could be engaged for this but that means they need a special fund to do this- it must not come from their core funding.

**Benefits –**

These are limited to hunting experience only in the documents.

‘The Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan (the Plan) seeks to maintain deer numbers at a level that:

- enhances the recreational wapiti hunting experience, including the opportunity to hunt healthier animals; and
- improves natural biodiversity and prevents the loss of native species from their current range.’

This is very biased & lacks basic evidence for this statement. .

What are the benefits for the general public?

**Setting precedents:**

These two initial projects could set precedents for other ungulates to be introduced to other ngaere with consequential ecological collapse in other conservation areas. Some examples could be- white tail deer, chamois, tahr, feral pigs. These are already causing havoc in our environment to our endemic

species, plus the farming industry. Costs to the farming industry through this onslaught is already rising exponentially in that industry, trying to eradicate them as they are becoming such a nuisance , costing farmers huge amounts of feed & loss of income.

### **Costs.**

These should be provided by the Sika & Wapiti organisations as they are wanting this hunting for a select group of hunters. This should not be a taxpayer responsibility. There should be an annual fee paid before hunting season starts.

## **WE NEED TO BE A VOICE FOR NATURE**

Whakataukī

**Titiro whakamuri, kōkiri whakamua**

**Look back & reflect so you can move forward**

**He iti, he pounamu.**

**It may be small but it is very precious**

Rangimārie,

Jenny Campbell

QSM for the Environment

### **Resources**

▪

Wapiti HOSI Briefing to Minister

<https://www.doc.govt.nz/globalassets/documents/about-doc/oia/2025/august/attachment-25-b-0190-wapiti-hosi-proposal.pdf>

▪

Sika HOSI Briefing to Minister

<https://www.doc.govt.nz/globalassets/documents/about-doc/oia/2025/25-b-0097-briefing-sika-hosi-proposal.pdf>

▪

<https://www.youtube.com/watch?v=x60VSHajHuQ&t=10s>

- <https://theconversation.com/despite-the-myth-deer-are-not-an-ecological-substitute-for-moa-and-should-be-part-of-nzs-predator-free-plan-187840>

- <https://newsroom.co.nz/2025/11/19/deer-threat-in-national-park-debated-as-herd-status-advances/>

- [https://newsroom.co.nz/2025/12/01/unruly-deer-set-up-camp-in-new-zealands-most-precious-places/?utm\\_source=Newsroom&utm\\_campaign=be54138e1f-Sunday+Briefing+07.12.2025&utm\\_medium=email&utm\\_term=0\\_71de5c4b35-be54138e1f-97942556&mc\\_cid=be54138e1f](https://newsroom.co.nz/2025/12/01/unruly-deer-set-up-camp-in-new-zealands-most-precious-places/?utm_source=Newsroom&utm_campaign=be54138e1f-Sunday+Briefing+07.12.2025&utm_medium=email&utm_term=0_71de5c4b35-be54138e1f-97942556&mc_cid=be54138e1f)

# Debbie Care

Submission Details

## **Dr Debbie Care: Submission on the Draft Sika Herd of Special Interest**

**Dr Debbie Care**

Environmental Scientist & Agricultural Systems Consultant

s9(2)(a)

s9(2)(a)

### **Submission on the Draft Sika Herd of Special Interest – Herd Management Plan**

To: Department of Conservation and the Minister for Hunting and Fishing

I am submitting in support of the Draft Sika Herd of Special Interest (HoSI) Herd Management Plan. My comments reflect a technical perspective on ecological management, animal population dynamics, and field-level operational design.

#### **1. Support for HoSI Designation as a Structured Management Framework**

The HoSI designation provides a clear statutory mechanism to manage sika specifically for hunting purposes while maintaining ecological safeguards. Given the scale and complexity of both Kaweka–Kaimanawa beech forest systems and the heterogeneous sika distribution, a unified framework is essential for consistency in decision-making, monitoring design, operational planning, and adaptive management.

The current situation - where recreational hunting alone cannot maintain densities at levels compatible with canopy regeneration, threatened-species protection, and long-term forest resilience - warrants the structured approach proposed.

#### **2. Endorsement of Hind-Focused Population Suppression**

The Plan appropriately identifies hind removal as the most effective lever for reducing recruitment and mitigating concentrated browse pressure. This is well supported by ungulate ecology literature: reducing female breeding cohorts has a disproportionate effect on population trajectory, localised impact gradients, and overall plant community recovery rates.

Targeting hinds in both recreational and professional control operations aligns with evidence from:

- mountain beech regeneration modelling (e.g., the Kaweka Mountain Beech Project),
- long-term forest dynamics under differential ungulate pressure, and
- hind-driven spatial patterning of browse damage.

The proposed approach is technically sound and necessary to shift ecological endpoints in the direction intended by the Plan.

#### **3. Support for Adaptive Management Through Quantitative Monitoring**

The monitoring framework outlined: seedling ratio indices, permanent 20 × 20 m vegetation plots, alpine browse assessments, and pellet count indices, is scientifically robust and appropriate for detecting both trend and trajectory in sika impacts.

I support:

- the requirement that ecological monitoring be conducted to DOC standard methods,
- integration of hunter-harvest age and jaw data to underpin herd structure modelling, and
- inclusion of monitoring outputs in annual public reporting.

These components are critical for defensible adaptive management and for demonstrating whether population-level actions translate into ecological improvement.

#### **4. Support for Stag-Selective Harvest and Maintenance of a Male-Biased Population**

The Plan's intent to maintain a male-biased herd is technically appropriate for a system where:

- stags are the primary recreational target,
- ecological pressure is predominantly hind-driven, and
- high rut activity and mature stag representation are desired recreationally.

The linkage between reduced hind density, improved forage availability, and enhanced physiological condition of stags is well established. This will support the Plan's aim of improving both herd quality and hunter satisfaction metrics.

#### **5. Professional Control Operations as a Necessary Complement**

The Plan correctly acknowledges that recreational hunting alone will not maintain densities consistent with seedling - sapling transition thresholds, especially in areas of low access, low encounter rates, or persistent hind clusters.

The explicit use of professional operations - particularly those using thermal-assisted targeting of hinds - is supported. This approach aligns with international best practice in ungulate management where ecological recovery is a stated objective.

#### **6. Technical Support for Annual Operational Plans and Reporting**

The requirement for an annual operational plan and an annual report is essential for transparency and iterative improvement. From a technical perspective, the plan-report cycle provides:

- measurable annual targets,
- defined operational areas,
- documented method selection,
- financial disclosure, and
- clear feedback loops for the next control season.

This structure will improve both ecological accountability and stakeholder confidence.

## **7. Support for Community and Hunter Contribution**

From a systems-level perspective, the Plan's approach to involving the hunting community in data collection, hind removal, and wider conservation activities strengthens the overall management model. These efforts improve coverage, cost-efficiency, and the social licence required for ongoing population suppression.

This is pragmatic, aligned with field realities, and reinforces a stewardship-based management culture.

## **8. Overall Technical Assessment**

Based on ecological evidence, population-dynamics theory, and operational feasibility, I consider the Draft Herd Management Plan to be:

- technically sound,
- ecologically defensible,
- operationally realistic, and
- well aligned with long-term biodiversity and recreational outcomes.

I therefore support the designation of the Sika Herd of Special Interest and the adoption of the draft Plan.

Thank you for the opportunity to provide submissions.

Sincerely,

**Dr Debbie Care**

Environmental Scientist & Agricultural Systems Consultant

# Luke Care - New Zealand Tahr Foundation

Submission Details

As chairman of the New Zealand Tahr Foundation I represent thousands of experienced backcountry public land hunters, many of whom value the Sika herd, the experience that Sika hunting drives, and the recreational value they derive from the activity.

Sika are the premiere North island public land hunting opportunity. They are valued by thousands of hunters who support better management that moves on from failed, archaic conservation legislation that treat deer as a pest. The sika Area has some of the highest use by recreational hunters in the country, partly because of the sika value and also because of its proximity to population centres.

The NZTF supports the GAC as the statutory body, and the Sika Foundation to implement the HOSI. The HMP needs to better reflect the values of hunters, not strictly focus on ecological outcomes. The desire of hunters to hunt the herd is what drives the ability for these improved outcomes.

Luke Care

# Trevor Chappell

Submission Details

## Eirwen Harris Mitchell

---

**From:** Trevor Chappell (NPP) [REDACTED]  
**Sent:** Saturday, 29 November 2025 11:15 am  
**To:** sikaHOSIHMP  
**Subject:** Submission  
  
**Categories:** Green Category

You don't often get email from [REDACTED] [Learn why this is important](#)

### HOSI for Sika Deer in the Kaweka and Kaimanawa Forest Parks

The proposal by the Central North Island Sika Foundation ( CNISF) and the Game Animal Council ( GAC) is a great initiative . In recent years the CNISF had made determined efforts to reduce the Sika deer populations in the Kaweka/Kaimanawa Ranges and a HOSI will acknowledge and continue such work. Conservation efforts, particularly geared towards the Whio/Blue Duck has been very successful and such programmes will be continued and extended, along with other conservation initiatives. The financial constraints currently now influencing operations by the controlling body - the Department of Conservation - would be offset by the CNISF and its volunteer workforce prepared to assist in game animal control and conservation projects.

I therefore support this HOSI proposal.

T.O. Chappell

[REDACTED]

[REDACTED]

# Shari Chase - Te Ranga o Ngāti Whitikaupeka

Submission Details

## Eirwen Harris Mitchell

---

**From:** Chair TRONW s9(2)(a)  
**Sent:** Tuesday, 9 December 2025 9:27 am  
**To:** sikaHOSIHMP; Dave Carlton; Dave Conley; Rikihana Clendon-Smallman  
**Cc:** s9(2)(a) Chair TRONW; Admin; Taiao  
**Subject:** Te Rūnanga o Ngāti Whitikaupeka HOSI submission  
**Attachments:** Te Runanga o Ngāti Whitikaupeka Sika HOSI submission.docx  
**Categories:** Green Category

You don't often get email from s9(2)(a) [Learn why this is important](#)

Tēnā koutou,

Please see attached HOSI submission on behalf of Te Rūnanga o Ngāti Whitikaupeka.

Ngā mihi

Shari Chase

Co Chair  
Te Rūnanga o Ngāti Whitikaupeka  
*"Kaupeka ki runga Kaupeka ki raro, Kui Kui, Whiti Whiti Ora!"*



## Sika HOSI proposal submission – Te Rūnanga o Ngāti Whitikaupeka

To: s9(2)(a), s9(2)(a), s9(2)(a)  
s9(2)(a)

Tēnā koutou

Re: Sika HOSI submission – Te Rūnanga o Ngāti Whitikaupeka

Te Rūnanga o Ngāti Whitikaupeka (TRoNW) have a keen interest in the Sika Herd of Special Interest (HOSI) draft Herd Management Plan (the “Plan”). The Department of Conservation (DOC) whenua covered by the proposal includes a section of our iwi area of interest in the Kaweka Forest Park. We also share a section of boundary with the Kaimanawa Forest Park. Along with our whanaunga iwi, Ngāti Tamakōpiri, we have a shared interest in the Owahaoko B&D lands, which border both Parks. In addition, TRoNW shares similar objectives to those highlighted in the Plan around better understanding and managing the Sika herd to protect our whenua, ngahere, and our taonga species.

TRoNW are generally supportive of the intent of the Plan, but the key issues we have are around ensuring:

- there is coordination, support, and alignment with all mana whenua iwi, māori landowners/Trusts and private landowners across the broader landscape.
- neighbouring landowners/managers are not going to be forced into complying with the objectives and requirements of the Plan/regime in the future.
- that the new management regime/entity for the Plan does not complicate or impede DOC’s Treaty negotiations and relationship with Mokai Patea Nui Tonu and their relationships with Iwi/hapū.
- how DOC intend to live up to their Section 4 obligations, when their responsibilities in this Plan are, for the most part placed on 3<sup>rd</sup> party groups (i.e. the Sika Foundation and the Game Animal Council).

### Discussion

Below is our feedback on the key issues of interest:

Section	Comments
General feedback	<p>In general, the objectives/strategies in the HOSI plan align with the objectives of TRoNW as we are keen to do similar conservation/ecological management work within our area of interest.</p> <p>We are also keen to better understand how we can assist DOC directly, and through our māori land trusts, manage the Sika herd on our whenua, rather than working with a 3<sup>rd</sup> party.</p> <p>The intent of the Plan is positive from an iwi perspective, but there are questions around how things will work in practice. We have questions around:</p> <ul style="list-style-type: none"><li>• How can the Sika herd can be successfully managed if the work is not coordinated and aligned with neighbouring landowners and managers at a broader landscape scale?</li><li>• What assistance and resources are available for neighbouring landowners to do similar work so that the objectives of the HOSI plan/work can be achieved?</li></ul>

## Sika HOSI proposal submission – Te Runanga o Ngāti Whitikaupeka

	<p>Although iwi would support working on this issue at a landscape scale, this would require DOC to support and resource all stakeholders. In the long-term, we would also be concerned if there were moves to force neighbouring landowners into undertaking any Sika herd management activities as part of the HOSI plan (or other related initiatives).</p> <p><b>Broader iwi/hapu concerns</b></p> <p>TRoNW are concerned that the introduction of a new management regime/entity to manage the Sika HOSI plan will complicate – and potentially impede - the Crown’s Treaty obligations and DOC/Iwi/Hapu relationships at a local level.</p> <p>The Treaty obligations and relationships between iwi and DOC must be prioritised and enhanced. From an iwi perspective, the fundamental obligations and relationships need to be maintained between DOC and our iwi. The Sika Foundation and Game Animal Council cannot replace this.</p>
<p><b>Draft HOSI plan feedback</b></p>	
<p>HOSI objectives (page 13 of draft Plan)</p>	<p><i>Sika are managed in a manner that allows for the maintenance of forest ecosystem processes, including canopy regeneration, and protects threatened species and their habitats.</i></p> <ul style="list-style-type: none"> <li>• Support this objective – TRoNW has recently stood up our Pou Taiao team who are working on our Iwi Environmental Management Plan, the mahi they are doing across our whole area of interest fits with this objective.</li> </ul> <p><i>The sika hunting experience is enhanced while contributing to overall management and regeneration of the Sika Area.</i></p> <ul style="list-style-type: none"> <li>• Support this objective – as above. This mahi will also benefit the hunting opportunities undertaken on our Owhaoko whenua. However, a balance must be found that allows recovery of our whenua and ngahere, whilst still allowing recreational hunting</li> </ul> <p><i>Seek to generate in kind support, and revenue through partnerships and sponsorships, to contribute to the cost of delivering this Plan.</i></p> <ul style="list-style-type: none"> <li>• Neutral – agree that additional funding needs to be found for this work, as DOC has scarce funding for their current work.</li> <li>• TRoNW would not be supportive of balloting or paid hunting on Public Conservation Land that took away opportunities for our uri and the public of Aotearoa, to hunt and recreate in the areas designated under this plan.</li> <li>• TRoNW are keen to understand what opportunities are available for supporting and resourcing neighbouring land blocks like Owhaoko B&amp;D and supporting iwi initiatives that align with this kaupapa.</li> </ul> <p><i>Engage the hunting community in the management of sika and the Sika Area so the community provide support for local conservation and social initiatives.</i></p> <ul style="list-style-type: none"> <li>• Neutral – agree with the intent of getting the community involved. However, this should not detract from Treaty obligations under the Conservation Act to engage and partner with iwi/hapū.</li> <li>• Engagement with iwi and our land trusts has so far been woefully inadequate.</li> </ul>

## Sika HOSI proposal submission – Te Runanga o Ngāti Whitikaupeka

	<p><i>Relationships between Ngāti Tūwharetoa, Ngāti Whitikaupeka, Ngāti Tamakōpiri, Mana Ahuriri Trust, Hineuru Iwi Trust, Tamatea Pōkai Whenua, the Department, the Game Animal Council and the Sika Foundation are strengthened, and opportunities for tangata whenua to be involved and participate in the management of sika are increased.</i></p> <ul style="list-style-type: none"> <li>• Support – critical that this mahi is supported by iwi/hapū and affected Māori land Trusts like Owahaoko B&amp;D Trust.</li> <li>• Keen to understand how this relationship strengthening will occur in practice, and how the fundamental DOC/iwi relationship doesn't become lost in any new arrangement.</li> <li>• From an iwi/hapū perspective, the fundamental obligations and relationships need to be maintained between DOC and iwi. Moves to add the Sika Foundation or Game Animal Council into this equation is not a complicator we would welcome.</li> </ul> <p><i>Knowledge and understanding of the dynamics between sika and indigenous species and ecosystems are improved.</i></p> <ul style="list-style-type: none"> <li>• Support – TRoNW are keen to learn and be informed of any research undertaken for this objective. This is likely to be useful for our land trusts and how they can improve management of our ngahere, taonga species, and the sika herd on our whenua.</li> </ul> <p><i>Monitoring enables adaptive management and demonstrates whether the management of sika is achieving the objectives of this Plan.</i></p> <ul style="list-style-type: none"> <li>• Support – TRoNW are keen to be kept informed of monitoring results, and whether there are opportunities for support/resourcing of monitoring initiatives in our area of interest.</li> </ul> <p><i>Research supports and enhances the management of sika and the Sika Area.</i></p> <ul style="list-style-type: none"> <li>• Support – TRoNW are keen to understand research that will assist with restoration initiatives on our whenua and how the Plan better manager's the Sika deer population.</li> </ul> <p><i>Public reporting provides information on whether the Plan is achieving the Objectives.</i></p> <ul style="list-style-type: none"> <li>• Neutral.</li> </ul>
<p><b>Strategies (pages 13 – 16)</b></p>	<p><i>Undertake monitoring and research to support management and decision making.</i></p> <ul style="list-style-type: none"> <li>• Support this strategy as TRoNW are also keen to understand what we can do on our whenua to enhance and support our conservation/ecological management goals.</li> <li>• Keen to know whether funding/resourcing is available for research/monitoring on our land locked Owahaoko whenua and through our wider area of interest which includes the Waiouru Military Training Area.</li> </ul> <p><i>Work closely with iwi and hapū to manage sika.</i></p> <ul style="list-style-type: none"> <li>• Support this strategy but note and insist that the primary Crown relationship for Te Runanga o Ngāti Whitikaupeka – sits directly with the Department of Conservation - Te Papa Atawhai, as our section 4, Treaty partner (not the Sika Foundation or Game Animal Council).</li> </ul>

## Sika HOSI proposal submission – Te Runanga o Ngāti Whitikaupeka

	<ul style="list-style-type: none"><li>• TRoNW expect our land trusts like Owahaoko B&amp;D would also have a management relationship with DOC in how this work/HOSI plan is implemented.</li></ul> <p><i>Undertake annual planning and reporting on management activities.</i></p> <ul style="list-style-type: none"><li>• Support - Would expect that TRoNW along with all other interested iwi groups listed above – are kept updated and given the opportunity to engage with annual planning and management activities.</li><li>• Recommend – That all planning frameworks and engagement opportunities are designed alongside TRoNW.</li></ul>
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Any queries relating to this submission, or additional correspondence on this kaupapa, should be sent to the following contacts:

- Pou Taiao o Ngāti Whitikaupeka: s9(2)(a)

Nga manaakitanga, na

Richard Steedman

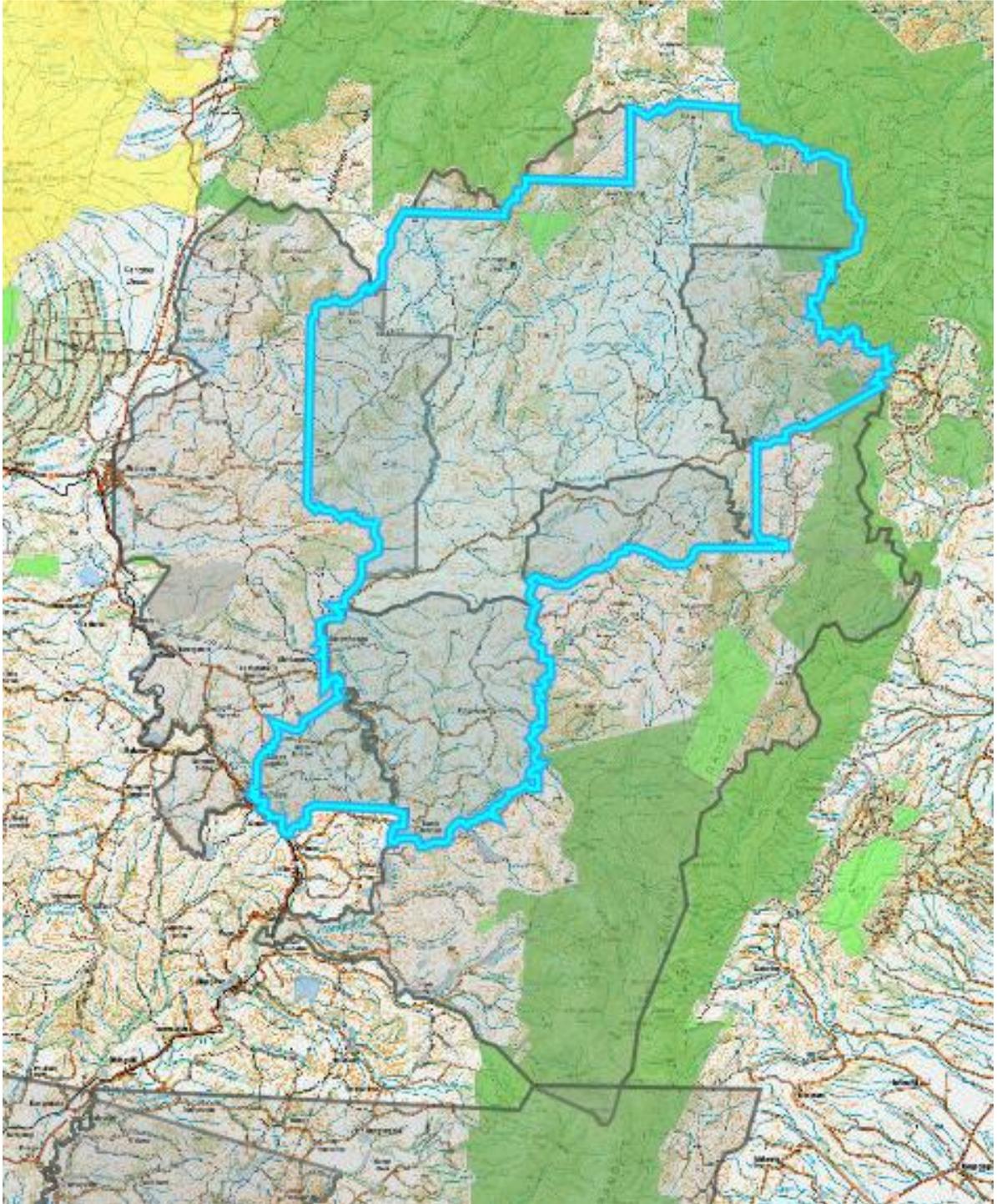
Shari Chase



Co-Chair's – Te Runanga o Ngāti Whitikaupeka

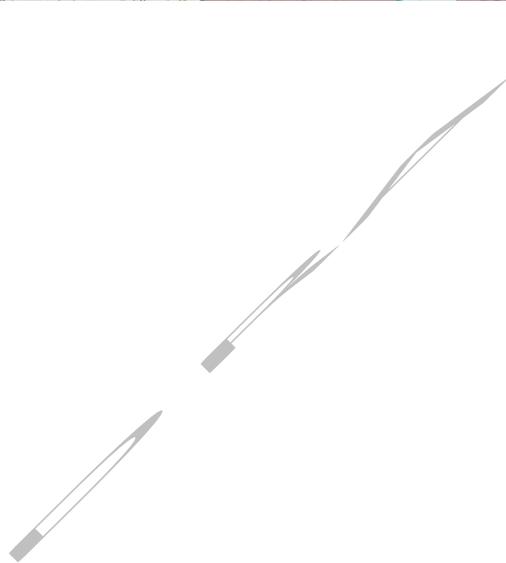
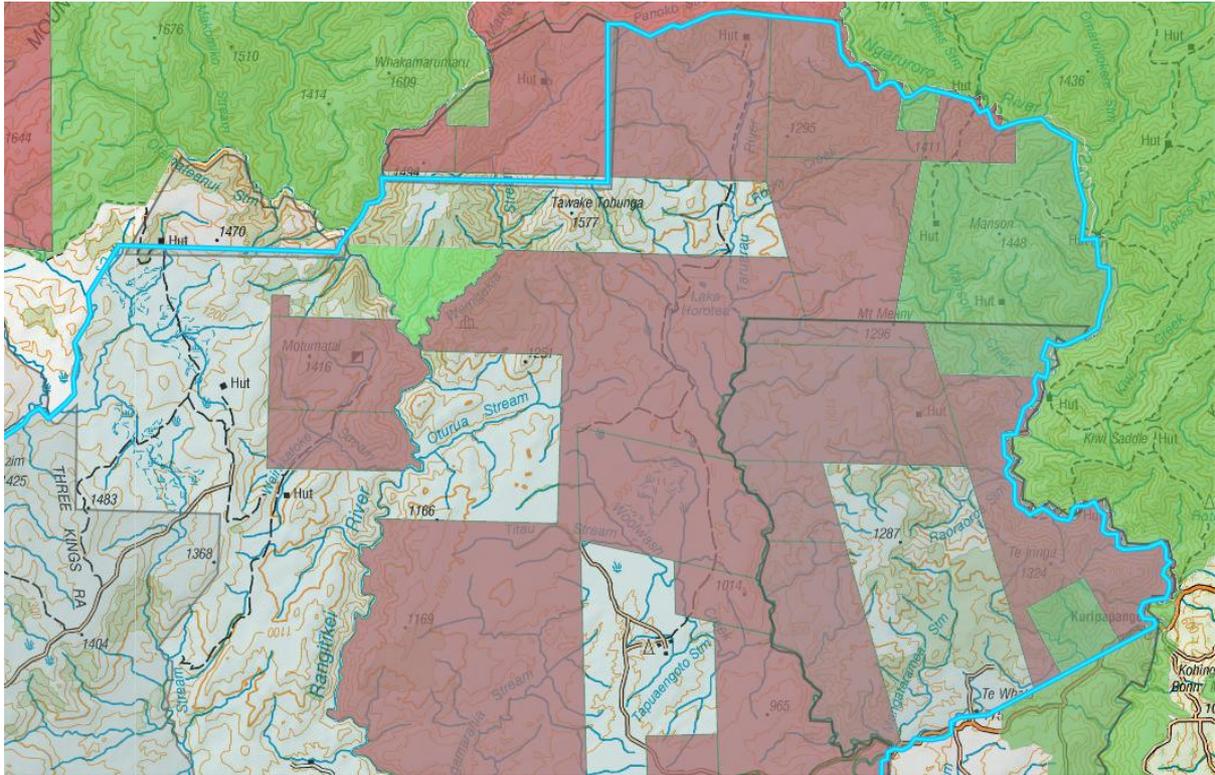
Sika HOSI proposal submission – Te Runanga o Ngāti Whitikaupeka

*Ngāti Whitikaupeka full area of interest, showing Kaimanawa boundary and areas of the Kaweka within our area of interest*



Sika HOSI proposal submission – Te Runanga o Ngāti Whitikaupeka

*Closer view of northern most area of interest, with Māori Land also highlighted*



# Linda Conning

Submission Details

## Eirwen Harris Mitchell

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**From:** s9(2)(a)  
**Sent:** Monday, 8 December 2025 11:54 am  
**To:** sikaHOSIHMP  
**Subject:** Sika HOSI draft HMP  
**Attachments:** HOSI submission sika Final.docx

**Categories:** Green Category

You don't often get email from s9(2)(a) [Learn why this is important](#)

Please find attached my submission.

Linda Conning

s9(2)(a)

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Department of Conservation,  
P.O. Box 4715  
Christchurch 8140  
Attn: Sika HOSI draft HMP submissions  
[sikahosihmp@doc.govt.nz](mailto:sikahosihmp@doc.govt.nz)

8 December 2025

## **SUBMISSION ON DRAFT SIKA HERD MANAGEMENT PLAN**

### INTRODUCTION

1. I was a member of the New Zealand Conservation Authority for 9 years and have a very good understanding of conservation policy and law. I have a Master's degree (1<sup>st</sup> class Hons) in Resource and Environmental Planning. In 2017 I was awarded a Queen's Service Medal for services to conservation. I live in the Whakatane District and visit the Tongariro-Taupo area most years.
2. I wish to speak to my submission.
3. I oppose this proposal.
4. The objectives of the draft management plan are incompatible e.g. Objectives 1 and 2. There is no way that indigenous biodiversity and forest regeneration can be improved and ecological processes be restored by allowing the area to be managed for hunting. It is counterproductive to the very concept of conservation to encourage trophy hunting in areas set aside for conservation for future generations – it is fundamentally wrong.
5. There is no evidence to show that recreational hunting in the Sika Area has any appreciable benefit to the reduction of browse of native plants in the parks. Recent reports from credible sources (Manaaki Whenua Landcare Research) indicate this. Research in the Northern Te Urewera Mainland island in the 1990s showed that deer densities needed to be almost zero to allow for plant regeneration. This has been confirmed by other ecologists, most recently Dr Bruce Clarkson. The Document acknowledges that “*Even a low-density sika population is likely to affect the regeneration of highly preferred palatable species in deer-accessible sites*”. But to

claim that “*less-preferred palatable species will benefit from the sika population being maintained well below the maximum sustainable yield*” is not credible.

6. Use of the phrase “*the maximum sustainable yield*” underpins the reality of this proposal – to farm exotic animals on public conservation land assigns them a status above the indigenous biodiversity and is the reverse of conservation. It begs the question as to what the Sika Foundation considers to be the maximum sustained yield?
7. All game animals in New Zealand are continually modifying our indigenous heritage by browsing (and exterminating) palatable native species in our native habitats. In most, if not all, forests outside of deer-free areas in Northland, Te Papa-Kura-o-Taranaki National Park and Coromandel, the forest understorey is either depauperate (in some cases non-existent), or limited to unpalatable species, mostly ferns and shrubs such as horopito and divaricating shrubs. “Leafy greens” such as large leafed Coprosmas, five finger and seedlings are rare, often only found on banks where ungulates cannot reach.
8. Browsing animals continue to degrade the indigenous biodiversity of the central North Island Forests. I have been into parts of the Kaimanawa Forest Park several times and seen areas with no groundcover, or elsewhere the understory is depauperate. As far back as the 1990s it was known that there was forest collapse in the Kaweka Range.
9. Contrary to the opinion of hunters, recreational hunting is **not** effective in reducing the damage of these animals to a level to enable regeneration. The lack of ground and shrub species means that there is less food for birds, who feed on berry-producing species, and having an ongoing threat to our already threatened wildlife, and exacerbates flooding by increasing run-off.
10. The section of the Management Plan headed “Conservation and introduced animals” makes it clear that aerial hunting is the most effective tool to reduce animal numbers to allow the mountain beech to re-establish. What is the strategy to control numbers in the less accessible (by hunters) sites? Hunters do not need to go far from a road end to get a deer or two for their freezers, and the Draft Management Plan highlights the lack of hunting effort in more remote parts.

11. An economic argument is used to justify this proposal. However there are no guarantees that the plan will be self-funded (these proposed actions use the non-committal wording “seek”) and there is an indication that there is likely to be on-going expenditure from DoC, including monitoring and enforcement. As the Jobs for Nature Funding is now defunct, if the funds that have already been allocated to the Central North Island Sika Foundation, and funds that will inevitably be required from DoC to operate this proposal were used directly for aerial control to remove deer, it is likely there would be greater benefit.
12. All detail necessary to assess the draft management plan is left to annual operational planning, to which the public and other park users have no input. It is not clear what and how monitoring will be done and what steps taken if the objectives are not being achieved: “1.3 *Apply other management options if recreational hunting is insufficient to maintain a sika population that achieves the ecological objectives of this Plan*” – such as?
13. The draft management plan is very general and doesn’t actually require actions to benefit the intrinsic values of the area e.g.4.3 Provide educational opportunities for *communities, hunters and interested parties about the:*
  - a) *contribution that managing sika for hunting purposes makes to improving forest and herd health;*What will happen if there is no improvement to forest health?
14. Even if there is an approach to target females to reduce populations, the ultimate result will be breeding larger male animals who consume more plant material and become larger with greater trampling and pugging on the forest floor.
15. I understand that the CNISF already has a Community Agreement with DoC which does not forfeit overall responsibility for conservation to an organisation with vested interests, and there is no reason why the current approaches should not continue. This is far preferable to handing over responsibility to a private organisation whose purpose is to benefit hunters, and not the biodiversity or experiences of other users.

## CONCLUSION

16. The state of these forests is demoralising for lovers of our indigenous forests, when we can see how damaged they are, and know that virtually no deer presence is a

requirement for effective regeneration, yet there is a proposal to legitimise their presence.

The proposal should be withdrawn.

# Lorraine Cook

Submission Details

## Eirwen Harris Mitchell

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**From:** Lorraine Cook [s9(2)(a)]  
**Sent:** Monday, 8 December 2025 8:40 pm  
**To:** sikaHOSIHMP  
**Subject:** Submission on the Sika HOSI Draft Management Plan  
**Attachments:** Submission on the Sika Herd of Special Interest Draft Herd Management Plan.pdf  
**Categories:** Green Category

You don't often get email from [s9(2)(a)] [Learn why this is important](#)

Kia ora,

Please find attached my submission on the Sika HOSI Draft Management Plan.

Regards,  
Lorraine Cook

## Submission on the Sika Herd of Special Interest Draft Herd Management Plan

By Lorraine Cook,

8 December 2025

Submitted to the Department of Conservation via email to [sikahosihmp@doc.govt.nz](mailto:sikahosihmp@doc.govt.nz)

To Whom It May Concern,

Thank you for the opportunity to provide feedback on the draft management plan for sika in the Kaimanawa and Kaweka forest parks. I am submitting as an individual. I work as an ecologist and reside in the Manawatū-Whanganui region.

The points I wish to make are as follows:

- I oppose Herds of Special Interest (HOSI) in general, and I oppose the designation of sika as a HOSI.
- It does not make common sense that an introduced species that causes so much damage to the environment would be afforded protection on public conservation land. Deer are reaching very high numbers across my region, thwarting conservation efforts and damaging our most threatened ecosystems. Deer are also a production pest, causing many landowners in the region to spend a lot of money each year controlling them. A landscape-wide, coordinated effort is desperately needed to deal with the problem on a large scale. I am concerned that a HOSI for sika could undermine deer control on surrounding lands and confuse the messaging around the impacts of deer.
- The main people who would benefit from HOSI are hunters. The Sika Foundation are strong advocates for a sika HOSI designation. However, it should be remembered that recreational hunters are a minority group. I believe that people who like to hunt should have opportunities to do so, but a hunting group's views on how public conservation land should be managed should not be prioritised over those of other groups or taken to represent the general public.
- In the Foreword of the draft management plan, the Minister states that there he expects there to be a range of benefits associated with managing sika for hunting purposes, but that these will be defined in a future gazette notice. This is completely inappropriate. How can we assess the Objectives and Strategies in the plan if we don't know the intended benefits? Saying that some benefits are expected or hoped is not very convincing. They should have been researched and stated.

- Regarding the plan itself, I was dismayed at the one-sidedness of its contents. There is a large body of research regarding the effects of deer on native forest and non-forest ecosystems. We are particularly fortunate to have a number of peer-reviewed, scientific publications specifically concerning the impacts of deer in the Kaimanawa and Kaweka ranges. From these publications, I understand that deer browse changes the composition of our native ecosystems even at very low densities, some of which likely require several decades in the absence of deer to recover. The most recent publication (Husheer and Tanentzap, 2024) concluded that to allow natural regeneration to occur in the mountain beech forests of the Kaimanawa and Kaweka ranges, deer density needs to be as low as 1 – 2 deer per km<sup>2</sup>. I expected at the very least that the draft management plan would reference these publications or acknowledge their existence. I thought it might constructively discuss the findings and implications of them in relation to managing sika for hunting purposes (as the implications appear to be significant). However, there was no mention of this research whatsoever.
- In my opinion, there needs to be an unbiased scientific review, given the body of evidence that exists, of the feasibility of managing the Kaimanawa and Kaweka forest parks in a way that both allows the natural regeneration of the forest, while also managing the sika herd for hunting purposes. At the moment, I am completely unconvinced that the two objectives are compatible.
- Although there are many other issues I could raise with this draft management plan, the final point I will make is around the suggestion that the Sika Foundation could be engaged to undertake many aspects of the management plan including animal management and control, hunter management, and educational initiatives. I consider this highly inappropriate given that the Sika Foundation are not an unbiased entity who I would trust to prioritise the health of the environment. The Department of Conservation should continue to be responsible for the management of sika deer on public conservation land, either alone or in partnership with iwi.
- I would also have liked to hear the views of iwi in this management plan, and a better explanation of how iwi would be treated as partners rather than just another group to be consulted with. I certainly did not get the feeling that this plan was written in conjunction with iwi.
- In conclusion, I recommend that you do not designate sika as a Herd of Special Interest.
- If there is opportunity to do so, I wish to be heard on my submission.

Kind regards,

Lorraine Cook

# Taina Cooper - Ngāti Tutemohuta

Submission Details

# Submission from Ngāti Tūtemohuta

## Draft Sika Deer Herd of Special Interest (HOSI) Management Plan

Department of Conservation

24<sup>th</sup> November 2025

### Introduction

Ngāti Tūtemohuta make this submission as mana whenua with ancestral connections to the Kaimanawa ranges, Taupō Moana and the wider landscapes shaped by our karangahapū. Our responsibilities as kaitiaki come from whakapapa and from the obligations passed down by our tīpuna. The health of these places is central to our identity and wellbeing.

We submit in response to the draft Sika Deer Herd of Special Interest (HOSI) Management Plan for the Kaimanawa and Kaweka Forest Parks.

### Our Position

Ngāti Tūtemohuta oppose the establishment of a Sika Deer Herd of Special Interest and do not support the draft management plan.

Although the Herds of Special Interest Bill has passed its second reading, it has not completed the full legislative process. Regardless of that progress, DOC remains bound by Te Piringa, which outlines how DOC must work with Ngāti Tūwharetoa under the Treaty settlement. That includes engaging directly with hapū and following hapū-led pathways. That has not occurred.

### Engagement

Ngāti Tūtemohuta have engaged in good faith.

We hosted a foundational hui at Pākira Marae with DOC, the Game Animal Council and the Sika Foundation, where clear direction was set and followed up in writing. We also attended the later hui with the Minister for Hunting and Fishing, despite the short notice and the engagement occurring outside the agreed pathway.

Despite this, the direction set by hapū has not been upheld. Communications have been misaligned, updates were sent out before hapū had briefed their own people, and DOC has continued to engage through iwi-level structures rather than the mandated hapū delegates.

We also note that DOC's own consultation support document states that submissions on the Minister's decision to designate the herd are "out of scope". This approach restricts mana whenua from commenting on the central issue and prevents hapū from influencing the designation itself. This is inconsistent with Te Piringa and is not reflective of a Treaty-based engagement process.

## **Cultural and environmental concerns**

The Kaimanawa and Kaweka forests influence the health of Taupō Moana, our waterways and the cultural landscape of our hapū. These are places of deep whakapapa, historical presence and enduring responsibility.

Sika deer are an introduced species causing measurable damage to native forest systems. DOC's own information acknowledges impacts on regeneration, understory health and long-term forest composition.

Elevating sika to a Herd of Special Interest privileges recreational hunting values at the expense of ecological restoration and hapū authority. This is not aligned with the aspirations of Ngāti Tūtemohuta for the wellbeing of our taiao.

## **Expectations for Next Steps**

Ngāti Tūtemohuta expect this kaupapa to return to the engagement pathway set at Pākira Marae, led by hapū and consistent with Te Piringa.

Until engagement is reset and aligned with hapū direction, the draft management plan cannot be progressed, and no designation decision can be considered valid.

## **Conclusion**

Ngāti Tūtemohuta are firm in our position.

We do not support the proposed Sika Deer Herd of Special Interest or the draft management plan.

We reaffirm our responsibilities as kaitiaki and expect the Crown and DOC to uphold their responsibilities under Te Tiriti o Waitangi and Te Piringa. Decisions about introduced species must prioritise the wellbeing of the taiao and uphold hapū authority.

We request that this process be paused until proper hapū-led engagement is restored.

Ngā manaakitanga,

Taina Cooper | Pou Taiao

**Ngāti Tutemohuta**