

Sika Herd Management Plan Submissions Record

Submission Attachments - submitter last names Cr - Mari

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John Cruden

Submission Details

Eirwen Harris Mitchell

From: John Cruden s9(2)(a)
Sent: Monday, 8 December 2025 8:44 am
To: sikaHOSIHMP
Subject: Submission on Sika HOSI
Attachments: Submission on a Sika "Herd of Special Interest" on Public Conservation Land.pdf
Categories: Green Category

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Please find attached a submission for the Dept's deliberation.

Thank you

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John Cruden

s9(2)(a)

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s9(2)(a)

ph/txt s9(2)(a)

Submission on a Sika “Herd of Special Interest” on Public Conservation Land

Introduction

My name is John Cruden and I have an MSc in Botany. I taught Science and Biology for 20 years after working for the Forest Research Institute in Canterbury and the West Coast.

Aotearoa New Zealand was the last large land mass to be colonised by humans. Although there have been notable extinctions up until the recent past, the biota, the diversity and the uniqueness of its flora and fauna are well worth the effort of saving, not only for us and our grandchildren, but also for the whole world.

I opposed the Game Animal Council (Herds of Special interest) Amendment Bill, and I have written a similar submission on the Wapiti herd.

Key Points

1. National Parks Act 1980 set out to try and preserve our landscapes and its biota, preferring to eradicate pests rather than breed them (Section 4(2)(b)). Creating a HOSI is explicitly contradicting the Act.
 - 1.1. Cabinet Paper 25-B-0156 shows that in June 2025 the Government decided that the way to deal with the inconvenient contradiction was to quickly progress the change to the 1980 Act under Budget 2025 urgency procedures, resulting in reduced time for public consultation.
 - 1.2. The yet to be passed amendment to the Game Council Act 2013 shows that this Government is not about conservation in the slightest, it appears to be more interested in clutching at passing straws in an effort to save the economy.
2. In March 2024, Forest & Bird filed an application for judicial review of the legality of the community agreement between the Director-General of DOC and FWF (Fiordland Wapiti Foundation). The action has been paused while the parties work out a settlement. This means that this herd of interest may be scuppered by whatever emerges from the contest. The outcome of this negotiation or ruling will likely affect what happens with Sika as well as the Wapiti.

3. The Newsroom reported on the 17th November 2025 post that the Seed Ration Index (SRI) was indicating that some areas are currently overstocked with deer, leading to poor projected outcomes by proposers.
4. There is a need for someone to enforce the hunting “beats” This enforcement, and potentially extracting injured or lost hunters, is likely to fall on the Department.
5. Mana whenua consultations are just that, falling short of the full engagement that the Treaty expects.
6. The Sika proposal is too light on detail especially with regard to costs. The Crown would, I think, want more information.
7. Like this submission everything is being done in haste. There are reduced consultations with the public, processes being conducted under urgency and ahead of settlements by the court. This seems to me to be badly made law and the decisions of these proposals should be suspended.

Conclusion

I strongly feel that the stocking of pestilent ungulates in our Public Conservation Areas is illegal and harmful. The Bill should be withdrawn, the proposed Sika herd be culled to protect the Public Conservation Land they are on.

Links

[Briefing to the Minister](#)

[Newsroom 19 November 2025](#)

[Minister’s description of changes to the 2013 Act to the Cabinet Economic Committee](#)

Kevin Dunn

Submission Details

6 December 2025

Submitter: Kevin Dunn

Email: s9(2)(a)

To: The Department of Conservation

Email: sikahosihmp@doc.govt.nz

Feedback on the Sika Herd of Special Interest Proposed Management Plan

Thank you for the opportunity to submit on the management plan for Sika HOSI.

I oppose the designation of Sika as a herd of special interest.

The process of trying to push this HOSI Plan through is a total waste of public money.

Background

I live in Canterbury and am old enough to have seen our National Parks and Reserves transition from having lush forest canopies with dense understories containing smaller trees, shrubs, vines, mosses, lichens, leaf litter and other plant species. Sadly with the explosion of deer, pigs and other ungulates this is no longer the case. The task of reducing pest numbers to "acceptable" levels will be a hugely costly exercise requiring a nation-wide management plan with clear, measureable objectives and a central government commitment of funding.

I totally disagree with the attempts to legitimise these introduced pests that devastate our forests and National Parks by defining them as Herds of Special Interest. The only thing "special" about these animals is the damage they cause. To allow them to roam in pre-determined herd sizes in the Kaimanawa and Kaweka Forest Parks so that trophy hunters can enjoy the experience of killing would be tragic.

The Herd Management Plan (the Plan)

The objectives for the Plan clearly favour hunters by emphasising healthy animals for trophy and recreational hunting. Ecological and environmental considerations have a much lower priority, despite the claim of "balance" in the Plan. The two objectives are in fact incompatible and under the Plan can only lead to severe ecological damage and forest collapse.

The strategies and objectives are vague, poorly defined and contradictory. There are no quantifiable and measureable outcomes to control the pests or to improve biodiversity over time, which should be fundamental in well prepared control plan.

An independent, robust monitoring program with clearly defined targets and responsibilities is needed to ensure the Plan is performing as expected.

Accountabilities and responsibilities are unclear and provide no certainty over who is responsible for what.

The budgets for the Plan are simplistic and inadequate. There is no information on how the Plan is to be funded. However, it appears the DOC may have to provide funding from its budget to cover a portion of the operating costs and any cost overruns. This can only lead to poor use of funds, decisions that are not in the best interests of taxpayers (who fund DOC) and further depletion of DOC's already stressed budget. Funding of the Plan should rest with the GAC along with the responsibility in how the funds are used.

The Plan should define the roles and responsibilities of all parties involved and the time frame over which the objectives are to be achieved. It is currently vague and totally inadequate in this area.

In conclusion, the Plan is balanced strongly in favour of the hunting sector and totally lacking credibility in ecological improvement. It is vague, with ill-defined objectives, strategies and targets. The focus should be on a coordinated national landscape control program to deal with the devastating effects of these pests on our environment. Such a program will need to be adequately funded.

As a final comment, forests that are severely degraded absorb little or no carbon. Eliminating deer and other ungulate pests will allow our forests to recover and contribute significantly to our emissions reduction targets.

Eirwen Harris Mitchell

From: Kevin Dunn s9(2)(a)
Sent: Sunday, 7 December 2025 3:07 pm
To: sikaHOSIHMP
Subject: Sika HOSI Management Plan Submission
Attachments: Submission Sika Dec25.pdf

Categories: Green Category

Glenn Dyer

Submission Details

Submission in Support of the Sika Management Plan

As a long-time hunter with deep roots in the Kaweka and Kaimanawa ranges, I strongly support the Sika Management Plan and the thoughtful strategies it outlines. The Sika Herd of Special Interest is far more than a game resource, it is a cornerstone of a vibrant, responsible, and conservation-minded community that contributes meaningfully to New Zealand's natural and social fabric.

Ecological Stewardship

The hunting community plays an active role in managing sika populations and controlling pests throughout the Kaimanawas. Our boots-on-the-ground presence helps maintain ecological balance, protect native flora and fauna, and support forest regeneration. We are not passive observers, we are stewards of the land, deeply invested in preserving the health of our wild spaces.

Social and Cultural Value

Hunting sika is more than a pastime, it's a tradition that binds people together. Over the years, I've shared countless trips into the bush with friends and family, forging lifelong bonds through shared experiences in nature. The camaraderie that hunting fosters is profound. It unites people across generations and backgrounds with a common purpose: protecting our slice of paradise.

Sustainable Harvest

The meat harvested from sika hunts is a valuable and sustainable food source. It nourishes our families and reinforces a respectful, utilitarian relationship with the land. This connection to our food and environment is increasingly rare and worth preserving.

Treaty Partnership and Community Leadership

I wish to acknowledge the vital contributions of our Treaty Partners, Ngāti Tūwharetoa, Ahuriri Hapū, Ngāti Hineuru, Heretaunga Tamatea, Ngāti Whitikaupeka, and Ngāti Tamakōpiri whose deep connection to the land is essential to the success of this plan. Their leadership, cultural knowledge, and stewardship are foundational to the long-term wellbeing of the Sika Area and its ecosystems.

Equally, the tireless efforts of the Sika Foundation and its champions, John Cook, Cam Speedy, the Duley Family, Mike Penn, and Allan Jackson deserve recognition. Their dedication to conservation, education, and community engagement has been instrumental in building a collaborative model of game animal management that benefits both people and the environment.

Knowledge and Responsibility

Hunters are not just participants, we are contributors to research, monitoring, and herd management. We understand the dynamics of the herd, the terrain, and the seasonal rhythms of the bush. Our insights and data help shape adaptive management strategies that benefit both conservation and recreation.

In conclusion, the Sika Management Plan recognizes the multifaceted value of the sika herd and the community that surrounds it. It balances ecological integrity with cultural heritage, and it empowers those who care most about the land to be part of its protection. I urge decision-makers to continue supporting this plan and the hunting community, Treaty Partners, and conservation leaders who uphold it.

Sincerely,

Glenn Dyer

s9(2)(a)

s9(2)(a)

Mark Elliotte

Submission Details

Eirwen Harris Mitchell

From: M W Elliott s9(2)(a)
Sent: Monday, 8 December 2025 1:57 pm
To: sikaHOSIHMP
Subject: Sika HOSI Herd Management Plan

Categories: Green Category

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Hello,

I support the Sika HOSI and ask for the following 2 points to be included :

- Recreational hunting should remain central to the management of all Herds of Special Interest.
- An annual survey of recreational hunters should be built into each management plan to ensure ongoing accountability and to confirm that the herds continue to meet the criteria for "special interest".

Thanks
Mark Elliott

Mark Elliotte - NZDA Upper Clutha Branch

Submission Details

Eirwen Harris Mitchell

From: Mark Elliott s9(2)(a)
Sent: Monday, 8 December 2025 3:38 pm
To: sikaHOSIHMP
Cc: 'Upper Clutha Deerstalkers'
Subject: Sika Herd of Special Interest

Categories: Green Category

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Hello,

The NZDA Upper Clutha Branch members support the establishment of a Sika, Herd Of Special Interest.

We value the herd and appreciate the opportunity of recreationally hunting Sika deer and assisting in their management. Hunters involved in game animal management enjoy being in the outdoors environment and enjoy the camaraderie with fellow hunters which is beneficial for their health and wellbeing.

In the first instance funding of the HOSI should go directly to the Sika Foundation. They must be held accountable for adhering to the plan which must require minimal paperwork and cost, yet being very effective and efficient.

The conservation efforts with pest trapping are an important part of the HOSI and hunters have proven with their previous activity how beneficial this is for bird life in trapline areas.

Please ensure that an annual survey of recreational hunters is built into the management plan to ensure ongoing accountability and to confirm that the herds continue to meet the criteria for "special interest".

Thanks,
Mark Elliott
President
NZDA Upper Clutha Branch

Gerald Freeman

Submission Details

Emma Bennett

From: Gerald Freeman s9(2)(a)
Sent: Thursday, 13 November 2025 1:47 pm
To: sikaHOSIHMP
Subject: Sika Control

Categories: Green Category

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The simplest and most cost-efficient plan is the elimination of a pest species. No need to mess around with consultation, just elimination.

Gerald Freeman

Tim Gale - Hunting & Fishing Napier

Submission Details

Eirwen Harris Mitchell

From: Tim Gale s9(2)(a)
Sent: Monday, 8 December 2025 8:53 pm
To: sikaHOSIHMP
Subject: Draft Herd Management Plan – Sika HOSI
Attachments: Submission Draft Herd Management Plan Sika HOSI - HF Napier.pdf
Categories: Green Category

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

Please find attached Hunting & Fishing Napier's submission on the Draft Herd Management Plan for Sika HOSI.

Best regards

Tim Gale

Manager / Co-owner
Hunting & Fishing Napier

P. s9(2)(a)

E. s9(2)(a)

www.huntingandfishing.co.nz



HUNTING
FISHING
DIVING
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TRAMPING
CLOTHING

8 December 2025

Department of Conservation,
P.O. Box 4715
Christchurch 8140
Attn: Sika HOSI draft HMP submissions

Email: sikahosihmp@doc.govt.nz

Draft Herd Management Plan – Sika HOSI

Hunting & Fishing Napier

1. This submission is on behalf of Hunting & Fishing Napier.
2. Established in 1986 Hunting & Fishing New Zealand now represents the 40 retail stores across New Zealand with combined annual earnings of approximately \$200 million. We have a consumer database of more than 150,000.
3. Hunting & Fishing Napier has been a part of the Hawke's Bay community for over 30 years.
4. Hunting & Fishing New Zealand is a leading national retailer of hunting, fishing, outdoor, and sporting equipment, serving a community of more than 1.2 million New Zealanders who participate in hunting and fishing. Of these, an estimated 80,000 undertake big game hunting. This sector contributes significantly to recreation, regional economies, conservation, and the social fabric of New Zealand.
5. The Hawke's Bay has a strong Sika hunting community who are passionate about Sika deer and value them for their meat, hunting them in the rut, hunting them for the experience, and Sika are the driver of many Hawke's

Bay hunters to get into the backcountry of New Zealand with friends and family.

6. The hunting of Sika deer in the Kaimanawas and Kaweka ranges is a popular activity for hunters of Hawke's Bay and the revenue generated from the hunting category within Hunting & Fishing Napier is significant.

Overview

7. As a hunting, fishing, outdoor and sporting goods retailer, Hunting & Fishing Napier supports changes to legislation that will improve the sustainable management of game animals and hunting and increase hunting opportunities whilst supporting ongoing conservation initiatives throughout New Zealand.
8. Hunting & Fishing Napier supports and works closely with the hunting sector and recognizes the immense amount of positive work organisations such as the Game Animal Council, New Zealand Deerstalkers Association, Fiordland Wapiti Foundation, Central North Island Sika Foundation and Tahr Foundation do to ensure that:
 - a. The activity of hunting is encouraged,
 - b. Game animals are sustainably managed, and
 - c. Conservation outcomes are improved.
9. Hunting & Fishing Napier supports initiatives that increase the quality, value and recognition of game animals and hunting across New Zealand and the designation of a HOSI will continue to raise the profile of this species.
10. Hunting & Fishing Napier supports initiatives that promote hunters, hunter values and the contribution that hunters make across New Zealand.
11. Hunting & Fishing Napier supports the designation and implementation of Herds of Special Interest (HOSI).
12. Hunting & Fishing Napier supports the concept of HOSI as an important modern day legislative tool for the sustainable management of Sika deer and for recognising game animals as valued introduced species that should be managed for both their benefits and their impacts.

13. Hunting & Fishing Napier supports the concept of HOSI because it helps ensure these species—and the hunting of them—remain a valued part of New Zealand’s social fabric.
14. Hunting & Fishing Napier supports the concept of HOSI because it reinforces the value of hunting and strengthens the role of hunters and other entities in responsible game animal management.
15. Hunting & Fishing Napier submits that the HOSI framework is critical for aligning hunting, community, and conservation values at place, enabling improved outcomes for game animals, hunters, recreational users, and conservationists, acknowledging that these groups frequently overlap.
16. Hunting & Fishing Napier submits that the HOSI framework provides an opportunity to drive economic growth by enabling more active promotion and management of the herd, increasing value recognition of the herd, and realising the associated benefits.
17. Hunting & Fishing Napier has reviewed the Draft Herd Management Plan (the draft HMP) and recommends amendments to the draft Plan to reflect the intent of a Herd Management Plan so that it aligns with the intent of the Game Animal Council Act and the value associated with the Sika herd and hunting of Sika deer.

1 Introduction		
Overriding considerations		
<p>Whilst the draft Plan lists what the Overriding considerations are, there is no analysis or explanation providing specific details of what the Overriding considerations are and how this Plan would be consistent with specific Considerations that may or may not be found in existing policies and strategies.</p> <p>This presents a risk to the designation of functions to the GAC, the adoption of the plan and in the future, the implementation of the Plan.</p>		
2 Values and key context		
	Position	Recommendation
	As the current drafting stands, the framing of the draft HMP is that of a	Frame the draft plan in the following order:

	<p>control plan for conservation outcomes.</p> <p>First and foremost, it is a Herd Management Plan therefore the sections need to be framed in a more fitting structure. The herd should be the focus of the plan, and the focus of the plan should be the herd.</p> <p>A HMP is a paradigm shift from a control plan. It needs to be a game animal management plan therefore recognising the values of the herd first, and the need to manage to herd to enable both hunting and conservation outcomes.</p> <p>There needs to be a clear delineation between culture, heritage, community and stewardship.</p> <p>Additionally, there is a very limited focus on community values, and in particular the values of hunters and the relationship they hold with the herd and the Kaimanawas and Kawekas.</p>	<ol style="list-style-type: none"> 1. Herd and hunting values 2. Conservation / stewardship values 3. Mana whenua values 4. Community values <p>Remove all reference to control and replace with management or adaptive management.</p> <p>Separate and redraft the sections to better outline the values.</p> <p>More emphasis is placed on the relationship between hunters and hunting of the herd and the benefits that arise from this relationship, i.e. social, health & wellbeing, economic and conservation.</p>
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3 Objectives and Strategies		
	Position	Recommendation
<p>Hunting & Fishing Napier supports having Objectives and Strategies, however further refinement is needed to provide adequate direction and feedback loops.</p> <p>The plan should be structured so that values inform the objectives, and objectives inform the strategies. This orderly and repeatable flow provides a sound basis for clear and consistent monitoring of the HMP.</p>		
Objective 1	Oppose	Objective 1 should only relate to Sika impacts management. This

	This objective is too general, impractical and cannot be monitored.	objective should only be for Sika management and not a system management objective.
Objective 2	Support the premise but submit that the wording should be amended as Objective 1 already speaks to conservation outcomes.	Amend to ‘Provide high quality hunting experiences’ This can be measured through herd health indicators and hunter surveys.
Objective 3	Support with amendments to be more action focused.	Build or maintain sources of income, partnerships, and in-kind support that advances the objectives of this HMP.
Objective 4	Support the intent, however the objective currently doesn’t emphasize the right outcome. The outcome reads as if hunters are still only being recognized as ‘tools’ for control as per the Wild Animal Control Act 1977 language.	Amend to ‘Build or maintain hunter and community involvement to manage the herd, increase the value of the herd and enhance conservation outcomes that promote the health of indigenous species’.
Objective 5		
Objective 6, 7, 8	Support in principle, however these can be amalgamated into ‘Adaptive Management’ which entails Objectives 6, 7, 8.	Reframe into a singular Objective; Apply an adaptive management framework based on monitoring and research to implement the Plan.
Objective 9	Oppose as this is not an Objective, it is an administrative procedure.	The requirement to report should be further down the HMP.

Strategies		
General		
	Position	Recommendation
1.1	<p>This section needs to be reframed to increase the recognition of the values of the herd.</p> <p>The term ‘population control’ needs to be removed as this is a management plan and not a control plan.</p> <p>The strong focus on controlling animals (dead deer) puts the onus on short term outcomes. The Sika Herd is a valued resource that needs ongoing sustainable management that moves New Zealand away from the ‘boom-bust’ cycles we have been stuck in.</p> <p>Game animal management is a long-term approach; it is not a one and done ‘control’ approach.</p>	<p>The Strategies need to focus on herd health and the habitat through sustainable management.</p>
1.2	<p>Support in principle with amendments.</p> <p>The focus on Sika management is not solely related to the rut. It is accepted that this is a peak time for hunting Sika, however, there are many customers of Hunting & Fishing Napier that hunt Sika deer all year round and value them for meat, experience, family time, recreation, mental health & wellbeing and the enjoyment of getting into the backcountry.</p>	<p>Amend overarching statement to ‘Enable recreational hunting and coordinate and manage herd management hunts, and professional management to selectively remove sika in a way that:</p> <p>Amend 1.2 a) to, prioritise areas for management activity.</p> <p>Amend 1.2 b) to, protects and enhances the Sika hunting experience.</p>
1.3	<p>Oppose as 1.3 is too vague and is captured in 1.2</p>	<p>Reframe to provide specifics (to avoid misinterpretation) or remove 1.3.</p>

General recreational hunting		
	Position	Recommendation
General	What is not clearly outlined within the Plan is if fees will be charged for the hunting of Sika deer within the HOSI. Fees should only be put in place if they are supported by the hunting sector therefore supporting a grass-roots community approach as opposed to the top-down approach.	
1.4	This currently happens through DOC Hunting Permits; therefore, it would be an administrative change.	
1.5	This currently happens through DOC Hunting Permits; therefore, it would be an administrative change.	
1.6	Support as the status quo for access to sika hunting will be maintained as far as practicable.	
1.7	Support with amendments to reflect the overriding considerations and enable management hunts to support management.	Add 'for herd management purposes' to the end of the sentence.
Herd management hunts		
	Position	Recommendation
1.10	Support.	
1.11	Support with amendments. HOSI changes the status of game animals from 'pests' to be controlled for their harmful effects, to 'valued introduced species' to be managed for both their values and their impacts.	Amend 1.11 c) to 'contribute to herd management activities.'
1.12	Support with amendments to make the strategy more action focused.	Amend 1.12 to 'Recover venison from sika removed as part of herd management hunts where efficiency and effectiveness are not compromised'.

Professional control activities		
We submit that this strategy heading needs to be amended to ‘Professional Herd Management Activities’. This amendment would reflect the intent, language and framing of the Game Animal Council Act 2013, not the language and framing of the Wild Animal Control Act 1977.		
1.13	Support in principle with amendments to terminology appropriate for a HMP.	Amend 1.13 to, Undertake professional herd management operations where recreational hunting and herd management hunts are insufficient to maintain a sika herd that achieves the objectives of this Plan.
1.14	Support in principle with amendments to terminology appropriate for a HMP and remove passive terminology.	Amend 1.14 to, Recover venison from sika removed as part of professional herd management operations where efficiency and effectiveness are not compromised.
Monitoring		
	Position	Recommendation
2.1	Support with amendments. 2.1 a) The use of Faecal pellet counts serves no purpose other than determining presence/absence. 2. 1 b) Submit that the absence of the Game Animal Council in 2.1 b to be rectified to include this Statutory Entity whose expertise lie in the management of game animals and the removal of Conservation Boards as they do not have a statutory function for game animal management, and involvement in sustainable game animal management is outside their statutory functions.	Amend 2.1 a) Remove faecal pellet counts. Amend 2.1b) Add the Game Animal Council and remove Conservation Boards.

	<p>It is likely that DOC will provide sufficient representation of conservation values when discussing new monitoring methods, tools and technologies.</p> <p>The methods to monitor populations and herd health should not be limited, as technology is rapidly evolving. If new monitoring tools are developed, they should be validated.</p>	<p>Amend for provisions to be made for new monitoring tools and methods and the need to validate to ensure consistency of results.</p> <p>Submit that 2.1 c) is amended from 'control targets' to 'herd management' as game animals are a valued introduced species.</p>
2.2	<p>Support with amendments.</p> <p>There is a risk that if the standards are set by the DOC then the standards will reflect a pest control framework as is the DOC's mandate.</p> <p>Standards and methods need to be industry best practice, and this may mean looking at standards and methods used in countries who have longstanding involvement and understanding in game animal management developed over many years.</p>	<p>Amend 2.2 to, Undertake ecological monitoring in accordance with best practice methods and standards.</p>
Research		
	Position	Recommendation
2.6	<p>One of the main purposes of the HMP is to manage the herd for its hunting value. Therefore, research to better understand the management of the HOSI should also investigate the hunter experience.</p>	<p>Amend 2.6 to, Undertake relevant research, including research related which may be related to, but is not limited to, the: a) spread,</p>

		behaviours and effects of sika on indigenous flora, and how this compares with that of other deer species; b) movement patterns and habitat utilisation of sika within the Sika Area; and c) changes in the health and composition of the sika herd over time. d) hunter harvest and satisfaction.
Partnerships		
	Position	Recommendation
4.1	Support with amendments. The inclusion of the words ‘associated with sika’ may limit the scope as to whom partnerships may be entered into with, therefore limiting the success of this plan.	Amend 4.1 to remove the words ‘associated with Sika’.
Stewardship		
4.4	Support with amendments to reflect the intent, language and framing of the Game Animal Council Act 2013, not the language and framing of the Wild Animal Control Act 1977.	Amend 4.4 to Provide a range of opportunities for the hunting community and other interested parties to actively contribute to sika herd management.
4.5	Support	
4.6	Support	
4.7	Support with amendments to make 4.7 more action orientated.	Amend 4.7 to, Provide a range of opportunities for the hunting community and other interested parties to contribute to wider conservation initiatives within the Sika Area, such as predator trapping and control programmes and the

		maintenance of public recreation infrastructure.
4.8	Support with amendments to make 4.8 more action orientated.	Amend 4.8 to, Work with the owners and managers of private land adjoining Kaweka Forest Park, Kaimanawa Forest Park and Kaweka Forest Conservation Area to improve the management of sika beyond the Sika Area.
Annual operational plan		
	Position	Recommendation
5.1	Support with amendments. HOSI changes the status of game animals from 'pests' to be controlled for their harmful effects, to 'valued introduced species' to be managed for both their values and their impacts.	Submit that all references to 'control' be replaced with 'management'.
5.2	Support with amendments. HOSI changes the status of game animals from 'pests' to be controlled for their harmful effects, to 'valued introduced species' to be managed for both their values and their impacts.	Submit that all references to 'control' be replaced with 'management'.
5.3	Support in part.	Submit that provisions are made within 5.3 to protect commercial sensitivities if private businesses or philanthropists wish to partner and donate.
5.4	Oppose in part. It is yet to be determined whether the Game Animal Council or the Department of Conservation will be the statutory management entity for HOSI implementation, therefore the provision	Delete 5.4

	<p>is unnecessary and creates undue bureaucracy.</p> <p>Note: The current system hasn't worked; generally, there is a lack of trust between the hunting community and the DOC and therefore the powers to administer the plan should be delegated to the GAC.</p>	
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If you have any queries relating to this submission, please do not hesitate to contact me directly.

Yours sincerely



Tim Gale
Co-owner / Manager
Hunting & Fishing Napier

s9(2)(a)

s9(2)(a)

Tim Gale

Submission Details

Eirwen Harris Mitchell

From: Tim Gale s9(2)(a)
Sent: Monday, 8 December 2025 8:57 pm
To: sikaHOSIHMP
Subject: Draft Herd Management Plan – Sika HOSI
Attachments: Submission Draft Herd Management Plan Sika HOSI - Tim Gale.pdf
Categories: Green Category

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

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

Thanks
Tim Gale

8 December 2025

Department of Conservation,
P.O. Box 4715
Christchurch 8140
Attn: Sika HOSI draft HMP submissions

Email: sikahosihmp@doc.govt.nz

Draft Herd Management Plan – Sika HOSI

1. I am submitting as an individual.
2. I support the designation and implementation of Sika as a Herd of Special Interest (HOSI).
3. From 2020 to 2025, I served as the General Manager of the New Zealand Game Animal Council, working with the hunting sector, recreation and conservation entities, government agencies, and six different ministers. Before that I was a biodiversity policy advisor at Greater Wellington Regional Council. I've also worked as a professional contract hunter and guide and hold a postgraduate diploma in natural resource management with a focus on big game animals.
4. I am a passionate and active recreational hunter, hunting for many species over many years across New Zealand.
5. So, this perspective is both professional and personal as most of my career has been dedicated to the sustainable management of game animals in New Zealand.
6. I am and have been a passionate and active Sika deer hunter for 38 years and value them for their meat, hunting them in the rut, hunting them for the experience, and Sika are a key driver of mine to get into the backcountry of New Zealand with friends and family.

7. I support changes to legislation that will improve the sustainable management of game animals and hunting and increase hunting opportunities whilst supporting ongoing conservation initiatives throughout New Zealand.
8. I support and have worked closely with the hunting sector and recognize the immense amount of positive work organisations such as the Game Animal Council, New Zealand Deerstalkers Association, Fiordland Wapiti Foundation, Central North Island Sika Foundation and Tahr Foundation do to ensure that:
 - a. The activity of hunting is encouraged,
 - b. Game animals are sustainably managed, and
 - c. Conservation outcomes are improved.
9. I support initiatives that increase the quality, value and recognition of game animals and hunting across New Zealand and the designation of a HOSI will continue to raise the profile of this species.
10. I support initiatives that promote hunters, hunter values and the contribution that hunters make across New Zealand.
11. I support the concept of HOSI as an important modern day legislative tool for the sustainable management of Sika deer and for recognising game animals as valued introduced species that should be managed for both their benefits and their impacts.
12. I support the concept of HOSI because it helps ensure these species—and the hunting of them—remain a valued part of New Zealand’s social fabric.
13. I support the concept of HOSI because it reinforces the value of hunting and strengthens the role of hunters and other entities in responsible game animal management.
14. I submit that the HOSI framework is critical for aligning hunting, community, and conservation values at place, enabling improved outcomes for game animals, hunters, recreational users, and conservationists, acknowledging that these groups frequently overlap.

15. I submit that the HOSI framework provides an opportunity to drive economic growth by enabling more active promotion and management of the herd, increasing value recognition of the herd, and realising the associated benefits.
16. I strongly support the Game Animal Council being the administrative body for Herds of Special Interest and submit that the Game Animal Council be delegated all necessary functions to administer all aspects of Herds of Special Interest (including drafting of any Herd Management Plan).
17. I submit that the necessary funding be reappropriated from the Department of Conservation's core Wild Animal funding to the Game Animal Council to support the necessary delivery of Herds of Special Interest.
18. I strongly oppose the Department of Conservation being the administrative body for Herds of Special Interest as the Department of Conservation in general has a history (in relation to wild/game animals, hunting and hunters) dating back to 1987 of:
 - a. failure relating to wild animal control and/or management,
 - b. inaction,
 - c. incompetence,
 - d. being ineffective and inefficient,
 - e. failing to work with hunters in a mana enhancing way that builds trust and achieves positive results.
19. I submit that the Department of Conservation's mandate is too wide, the legislative framework they work under is a myriad of complexity meaning they get bogged down in layers of bureaucracy which results in ineffectiveness and inefficiency.
20. Sustainable game animal management requires a body (such as the Game Animal Council) who is solely focussed on game animal management, hunters and hunting.
21. I have reviewed the Draft Herd Management Plan (the draft HMP) and recommends amendments to the draft Plan to reflect the intent of a Herd Management Plan so that it aligns with the intent of the Game Animal

Council Act and the value associated with the Sika herd and hunting of Sika deer.

1 Introduction		
Overriding considerations		
<p>Whilst the draft Plan lists what the Overriding considerations are, there is no analysis or explanation providing specific details of what the Overriding considerations are and how this Plan would be consistent with specific Considerations that may or may not be found in existing policies and strategies.</p> <p>This presents a risk to the designation of functions to the GAC, the adoption of the plan and in the future, the implementation of the Plan.</p>		
2 Values and key context		
	Position	Recommendation
	<p>As the current drafting stands, the framing of the draft HMP is that of a control plan for conservation outcomes.</p> <p>First and foremost, it is a Herd Management Plan therefore the sections need to be framed in a more fitting structure. The herd should be the focus of the plan, and the focus of the plan should be the herd.</p> <p>A HMP is a paradigm shift from a control plan. It needs to be a game animal management plan therefore recognising the values of the herd first, and the need to manage to herd to enable both hunting and conservation outcomes.</p> <p>There needs to be a clear delineation between culture, heritage, community and stewardship.</p> <p>Additionally, there is a very limited focus on community values, and in particular the values of hunters and the</p>	<p>Frame the draft plan in the following order:</p> <ol style="list-style-type: none"> 1. Herd and hunting values 2. Conservation / stewardship values 3. Mana whenua values 4. Community values <p>Remove all reference to control and replace with management or adaptive management.</p> <p>Separate and redraft the sections to better outline the values.</p> <p>More emphasis is placed on the relationship between hunters and</p>

	relationship they hold with the herd and the Kaimanawas and Kawekas.	hunting of the herd and the benefits that arise from this relationship, i.e. social, health & wellbeing, economic and conservation.
3 Objectives and Strategies		
	Position	Recommendation
<p>I support having Objectives and Strategies, however further refinement is needed to provide adequate direction and feedback loops.</p> <p>The plan should be structured so that values inform the objectives, and objectives inform the strategies. This orderly and repeatable flow provides a sound basis for clear and consistent monitoring of the HMP.</p>		
Objective 1	<p>Oppose</p> <p>This objective is too general, impractical and cannot be monitored.</p>	Objective 1 should only relate to Sika impacts management. This objective should only be for Sika management and not a system management objective.
Objective 2	Support the premise but submit that the wording should be amended as Objective 1 already speaks to conservation outcomes.	<p>Amend to ‘Provide high quality hunting experiences’</p> <p>This can be measured through herd health indicators and hunter surveys.</p>
Objective 3	Support with amendments to be more action focused.	Build or maintain sources of income, partnerships, and in-kind support that advances the objectives of this HMP.
Objective 4	<p>Support the intent, however the objective currently doesn’t emphasize the right outcome.</p> <p>The outcome reads as if hunters are still only being recognized as ‘tools’ for</p>	Amend to ‘Build or maintain hunter and community involvement to manage the herd, increase the value of the herd and enhance

	control as per the Wild Animal Control Act 1977 language.	conservation outcomes that promote the health of indigenous species’.
Objective 5		
Objective 6, 7, 8	Support in principle, however these can be amalgamated into ‘Adaptive Management’ which entails Objectives 6, 7, 8.	Reframe into a singular Objective; Apply an adaptive management framework based on monitoring and research to implement the Plan.
Objective 9	Oppose as this is not an Objective, it is an administrative procedure.	The requirement to report should be further down the HMP.

Strategies		
General		
	Position	Recommendation
1.1	<p>This section needs to be reframed to increase the recognition of the values of the herd.</p> <p>The term ‘population control’ needs to be removed as this is a management plan and not a control plan.</p> <p>The strong focus on controlling animals (dead deer) puts the onus on short term outcomes. The Sika Herd is a valued resource that needs ongoing sustainable management that moves New Zealand away from the ‘boom-bust’ cycles we have been stuck in.</p> <p>Game animal management is a long-term approach; it is not a one and done ‘control’ approach.</p>	The Strategies need to focus on herd health and the habitat through sustainable management.
1.2	<p>Support in principle with amendments.</p> <p>The focus on Sika management is not solely related to the rut. It is accepted that this is peak time for hunting Sika, however, myself and many others I</p>	Amend overarching statement to ‘Enable recreational hunting and coordinate and manage herd management hunts, and professional

	know highly value hunting Sika deer all year round and value them for meat, experience, family time, recreation, mental health & wellbeing and the enjoyment of getting into the backcountry.	management to selectively remove sika in a way that: Amend 1.2 a) to, prioritise areas for management activity. Amend 1.2 b) to, protects and enhances the Sika hunting experience.
1.3	Oppose as 1.3 is too vague and is captured in 1.2	Reframe to provide specifics (to avoid misinterpretation), or remove 1.3.
General recreational hunting		
	Position	Recommendation
General	What is not clearly outlined within the Plan is if fees will be charged for the hunting of Sika deer within the HOSI. Fees should only be put in place if they are supported by the hunting sector therefore supporting a grass-roots community approach as opposed to the top-down approach.	
1.4	This currently happens through DOC Hunting Permits; therefore, it would be an administrative change.	
1.5	This currently happens through DOC Hunting Permits; therefore, it would be an administrative change.	
1.6	Support as the status quo for access to sika hunting will be maintained as far as practicable.	
1.7	Support with amendments to reflect the overriding considerations and enable management hunts to support management.	Add 'for herd management purposes' to the end of the sentence.
Herd management hunts		
	Position	Recommendation
1.10	Support.	

1.11	Support with amendments. HOSI changes the status of game animals from 'pests' to be controlled for their harmful effects, to 'valued introduced species' to be managed for both their values and their impacts.	Amend 1.11 c) to 'contribute to herd management activities'.
1.12	Support with amendments to make the strategy more action focused.	Amend 1.12 to 'Recover venison from sika removed as part of herd management hunts where efficiency and effectiveness are not compromised'.
Professional control activities		
I submit that this strategy heading needs to be amended to 'Professional Herd Management Activities'. This amendment would reflect the intent, language and framing of the Game Animal Council Act 2013, not the language and framing of the Wild Animal Control Act 1977.		
1.13	Support in principle with amendments to terminology appropriate for a HMP.	Amend 1.13 to, Undertake professional herd management operations where recreational hunting and herd management hunts are insufficient to maintain a sika herd that achieves the objectives of this Plan.
1.14	Support in principle with amendments to terminology appropriate for a HMP and remove passive terminology.	Amend 1.14 to, Recover venison from sika removed as part of professional herd management operations where efficiency and effectiveness are not compromised.
Monitoring		
	Position	Recommendation
2.1	Support with amendments.	

	<p>2.1 a) The use of Faecal pellet counts serves no purpose other than determining presence/absence.</p> <p>2. 1 b) Submit that the absence of the Game Animal Council in 2.1 b to be rectified to include this Statutory Entity whose expertise lie in the management of game animals and the removal of Conservation Boards as they do not have a statutory function for game animal management, and involvement in sustainable game animal management is outside their statutory functions.</p> <p>It is likely that DOC will provide sufficient representation of conservation values when discussing new monitoring methods, tools and technologies.</p> <p>The methods to monitor populations and herd health should not be limited, as technology is rapidly evolving. If new monitoring tools are developed, they should be validated.</p>	<p>Amend 2.1 a) Remove faecal pellet counts.</p> <p>Amend 2.1b) Add the Game Animal Council and remove Conservation Boards.</p> <p>Amend for provisions to be made for new monitoring tools and methods and the need to validate to ensure consistency of results.</p> <p>Submit that 2.1 c) is amended from ‘control targets’ to ‘herd management’ as game animals are a valued introduced species.</p>
2.2	<p>Support with amendments.</p> <p>There is a risk that if the standards are set by the DOC then the standards will reflect a pest control framework as is the DOC’s mandate.</p>	<p>Amend 2.2 to, Undertake ecological monitoring in accordance with best practice methods and standards.</p>

	Standards and methods need to be industry best practice, and this may mean looking at standards and methods used in countries who have longstanding involvement and understanding in game animal management developed over many years.	
Research		
	Position	Recommendation
2.6	One of the main purposes of the HMP is to manage the herd for its hunting value. Therefore, research to better understand the management of the HOSI should also investigate the hunter experience.	Amend 2.6 to, Undertake relevant research, including research related which may related to, but is not limited to, the: a) spread, behaviours and effects of sika on indigenous flora, and how this compares with that of other deer species; b) movement patterns and habitat utilisation of sika within the Sika Area; and c) changes in the health and composition of the sika herd over time. d) hunter harvest and satisfaction.
Partnerships		
	Position	Recommendation
4.1	Support with amendments. The inclusion of the words ‘associated with sika’ may limit the scope as to whom partnerships may be entered into with, therefore limiting the success of this plan.	Amend 4.1 to remove the words ‘associated with Sika’.
Stewardship		
4.4	Support with amendments to reflect the intent, language and framing of the Game Animal Council Act 2013, not the	Amend 4.4 to Provide a range of opportunities for the hunting community

	language and framing of the Wild Animal Control Act 1977.	and other interested parties to actively contribute to sika herd management.
4.5	Support	
4.6	Support	
4.7	Support with amendments to make 4.7 more action orientated.	Amend 4.7 to, Provide a range of opportunities for the hunting community and other interested parties to contribute to wider conservation initiatives within the Sika Area, such as predator trapping and control programmes and the maintenance of public recreation infrastructure.
4.8	Support with amendments to make 4.8 more action orientated.	Amend 4.8 to Work with the owners and managers of private land adjoining Kaweka Forest Park, Kaimanawa Forest Park and Kaweka Forest Conservation Area to improve the management of sika beyond the Sika Area.

Annual operational plan

	Position	Recommendation
5.1	Support with amendments. HOSI changes the status of game animals from 'pests' to be controlled for their harmful effects, to 'valued introduced species' to be managed for both their values and their impacts.	Submit that all references to 'control' be replaced with 'management'.
5.2	Support with amendments. HOSI changes the status of game animals from 'pests' to be controlled for their harmful effects, to 'valued introduced species' to be managed for both their values and their impacts.	Submit that all references to 'control' be replaced with 'management'.

5.3	Support in part.	Submit that provisions are made within 5.3 to protect commercial sensitivities if private businesses or philanthropists wish to partner and donate.
5.4	<p>Oppose in part.</p> <p>It is yet to be determined whether the Game Animal Council or the Department of Conservation will be the statutory management entity for HOSI implementation, therefore the provision is unnecessary and creates undue bureaucracy.</p> <p>Note: The current system hasn't worked; generally, there is a lack of trust between the hunting community and the DOC and therefore the powers to administer the plan should be delegated to the GAC.</p>	Delete 5.4

If you have any queries relating to this submission, please do not hesitate to contact me directly.

Yours sincerely



Tim Gale

s9(2)(a)

s9(2)(a)

Trev Gratton - NZDA Hutt Valley Branch

Submission Details

Eirwen Harris Mitchell

From: NZ Deerstalkers' (Hutt Valley Branch) Inc. s9(2)(a)
Sent: Monday, 8 December 2025 8:46 pm
To: wapitiHOSIHMP; sikaHOSIHMP
Subject: Combined Submission Wapiti & Sika HOSI
Attachments: HVNZDA HOSI Submission Dec 2025.pdf

Categories: Green Category

Some people who received this message don't often get email from s9(2)(a). [Learn why this is important](#)

Kia ora koutou,

Please find attached the Hutt Valley Branch NZDA submission on the proposed *Wapiti & Sika Herds of Special Interest Management Plan*.

Our submission reflects the practical experience of our members, the mahi they do on the whenua, and our commitment to working alongside DOC in a positive, solutions-focused way. We appreciate the opportunity to contribute to this kaupapa and to support good outcomes for conservation, access, and the long-term management of these herds.

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

Ngā mihi nui,

Trev Gratton
President





Submission on Draft Herd Management Plans for Sika and Wapiti Herds of Special Interest

Hutt Valley Branch – New Zealand Deerstalkers Association (Inc)

Contact: Trevor Gratton, Branch President

Email: huttvalley@deerstalkers.org.nz

Mobile: s9(2)(a)

Date: 8th December 2025

1. Introduction

The Hutt Valley Branch of the New Zealand Deerstalkers Association (HVNZDA) welcomes the opportunity to submit on the draft Herd Management Plans for the Sika and Wapiti Herds of Special Interest (HOSI).

We're a large and active branch with over 1,000 members covering Upper Hutt, Lower Hutt, Wairarapa, Wellington and the surrounding areas. Our members are out in the hills week in, week out. We run the Kaitoke Range Complex, deliver the HUNTS programme, support the National Wild Goat Hunting Competition, and work with landowners and councils through the Landowner Assist programme. We're practical people who value conservation, good ethics, and responsible hunting.

We support the direction behind HOSI. We want to see these two herds thrive, not just survive. This submission reflects the practical experience of our branch and what our members value in a genuinely 'special' herd.

2. General Position

We support the creation of Sika and Wapiti Herds of Special Interest and the Minister's intent: better hunting experiences, recognition of recreational value, and strong hunter-led stewardship.

We back the national NZDA submission and the work of the Sika Foundation and Wapiti Foundation. They have the credibility, trust, and track record to deliver real on-the-ground outcomes.

However, we believe the draft Herd Management Plans miss some key elements needed to make HOSI work for hunters and to protect what makes these herds genuinely special.

3. Protecting What Makes These Herds "Special"

From the perspective of our members, the current drafts lean too heavily on vegetation, control work, and ecosystem indicators. These matter — but they're only one part of the puzzle. What makes Sika and Wapiti herds "special" to hunters is not defined, measured, or reported anywhere.

When hunters talk about a special herd, we mean:

- Healthy animals in good condition
- A proper age structure with mature animals present
- A reliable, high-quality hunting experience
- Trophy opportunities where appropriate
- Fair and open access for all New Zealanders
- A sense of stewardship and responsibility for the herd
- Wilderness character and a hunting experience that feels authentic

If these things aren't tracked and protected, HOSI risks turning into a dressed-up version of standard wild animal control. That's not the intent behind the legislation and not what hunters across the country signed up for.

Our Recommendation:

Add a specific objective to both plans:

“Protect and enhance the special status of the herd for recreational hunters.”

And back it up with real indicators:

- Hunter success rates
- Presence and retention of mature animals
- Demand vs opportunity (e.g., ballots)
- Hunter satisfaction surveys
- A simple hunter sentiment tracker — “Is this herd still special?”

4. Funding Must Go Directly to the Hunter-Led Foundations

Hunters are willing to contribute financially — as long as the money goes where it’s intended. Funding must flow directly to the Sika Foundation and Wapiti Foundation, not into government budgets or general DOC workstreams.

Hunters trust the Foundations. They’re efficient, they deliver results, and they’re accountable to the very people who care most about the herds. Routing funding through central agencies risks turning HOSI into “user-pays pest control,” which would kill long-term support overnight.

Recommended wording:

“Funding generated for a Herd of Special Interest should be directed to the recognised hunter-led foundation responsible for delivering herd management.”

5. Hunter Social Licence Must Be Protected

In our region we work with Upper Hutt City Council, local landowners, forestry companies, DOC staff, and community groups. Our volunteers donate thousands of hours to conservation and public good projects. Hunter social licence is something we earn every day.

HOSI must reinforce this, not undermine it. That means:

- Hunters treated as partners, not an afterthought
- Ground-based, hunter-inclusive control prioritised where practical

- Avoiding over-reliance on aerial/thermal operations in core hunting areas
- Transparency around decisions, success, and failure

6. Adaptive Management — Not Rigid Targets

HOSI is new. It needs room to breathe and improve over time. The first five years should be flexible and focused on learning. Annual reporting, clear feedback loops, and the ability to adjust quickly if indicators drop should all be built in.

Measuring success should be based on direction and trends — not one-off numbers or unrealistic expectations.

7. Fair Access and Equity

This matters hugely to our branch and our members. Access must remain fair and transparent. No favouritism, no concentration of opportunity in a small group. Decisions must be open, consistent, and accessible to everyday New Zealand hunters.

8. Conclusion

The Hutt [REDACTED] supports the intent of Herds of Special Interest. With some targeted improvements, these plans can set up the Sika and Wapiti herds for long-term success and ensure they remain genuinely special to hunters across Aotearoa.

To succeed, the plans must:

- Explicitly protect what makes these herds special
- Measure hunting-quality indicators, not just ecological ones
- Ensure hunter-generated funding goes directly to the Foundations
- Value hunters as partners in conservation
- Keep access fair and transparent
- Stay flexible, adaptive, and grounded in real-world outcomes

Ngā mihi nui,

Hutt Valley Branch

New Zealand Deerstalkers Association

Hutt Valley

Est. 1937



Trev Gratton - Lower North Island Red Deer Foundation

Submission Details

Eirwen Harris Mitchell

From: Trevor Gratton s9(2)(a)
Sent: Monday, 8 December 2025 10:26 pm
To: wapitiHOSIHMP; sikaHOSIHMP
Subject: Submission Sik & Wapiti HOSI Draft Management Plan
Attachments: LNIRDF HOSI Submission.pdf

Categories: Green Category

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

Kia ora koutou,

Please find attached the Lower North Island Red Deer Foundation (LNIRDF) joint submission on the Wapiti and Sika Herds of Special Interest Draft Management Plans.

These submissions reflect our members' on-the-ground experience across the lower North Island and our ongoing commitment to working alongside DOC, iwi and the wider hunting community to achieve good conservation and game management outcomes.

If you require any clarification or further information, or would like to discuss any of the points raised, please don't hesitate to get in touch.

Ngā mihi nui

Trev Gratton
Owner/Operator

s9(2)(a)



Lower North Island Red Deer Foundation (Inc)

Est 2016

Submission on the Draft Management Plans for Sika and Wapiti Herds of Special Interest

From: Lower North Island Red Deer Foundation (LNIRDF)

Date: 8th December 2025

1. Introduction

The Lower North Island Red Deer Foundation (LNIRDF) welcomes the opportunity to provide feedback on the draft Sika and Wapiti Herds of Special Interest Management Plans.

Our organisation represents hunters, volunteers, and conservation-minded stakeholders across the Ruahine, Tararua, Remutaka, and Aorangi forest parks, with a long history of practical involvement in deer management and biodiversity protection.

Our kaupapa is simple:

support sustainable, ethical recreational hunting as an effective tool for managing deer numbers while protecting our native ecosystems.

We value a constructive working relationship with the Department of Conservation (DOC), iwi partners, local hunting clubs, and the wider community.

2. Overall Position

LNIRDF generally supports the intent of the draft plans, particularly the formal recognition of Sika and Wapiti as Herds of Special Interest, and the opportunity to embed hunter-led conservation into long-term management.

However, we believe the plans must:

- strengthen the role of recreational hunters and the organised hunting community
- ensure transparency and fairness in access, monitoring, and reporting
- deliver practical, cost-effective methods of population control
- align with national frameworks such as Te Ara Ki Mua
- emphasise partnership with iwi, DOC, and hunting stakeholders
- continue to avoid unnecessary reliance on aerial culling or poisons where viable hunter-led alternatives exist

3. Key Submission Points

3.1 Recognition of Recreational Hunting as a Primary Management Tool

LNIRDF strongly supports recognition of hunting as the primary and most cost-effective method for maintaining deer populations within ecological limits.

Recent hunter-led management in the Ruahine Ranges, supported by DOC, removed 80 breeding hinds in 2025 across difficult terrain—matching or exceeding the cost effectiveness of aerial operations. This is evidence of what can be achieved through partnership, planning, and boots-on-the-ground hunters.

We recommend the plans include:

- long-term commitments to hunter-led management programmes
- monitoring frameworks using hunter data, harvest returns, and field observations
- a requirement for DOC to utilise organised hunting groups before any aerial culls are considered

3.2 Partnership with Iwi, DOC, and Local Communities

LNIRDF endorses the draft plans' emphasis on partnership with iwi and mana whenua. We support a co-governance approach that:

- embeds the values of kaitiakitanga
- strengthens relationships between DOC, iwi, and the hunting community
- reflects the importance of deer to hunting culture while protecting taonga species

We recommend that:

- hunting groups are included in every major planning and review cycle
- volunteer mahi by hunting organisations is formally recognised within the plan

3.3 Fair, Transparent, and Accessible Ballot and Access Systems

Access must be fair, equitable, and transparent.

Ballot systems should:

- prioritise NZ-based hunters
- avoid overly restrictive limitations on hunter numbers
- ensure that success rates, participation data, and population monitoring are made publicly available
- include representation from iwi and recognised hunting organisations in governance

3.4 Environmental Outcomes and Monitoring

LNIRDF supports clear environmental outcome targets, provided they are:

- realistic

- science-based
- transparent
- co-designed with stakeholders

Monitoring should combine:

- DOC vegetation and browse assessments
- hunter harvest and sighting data
- long-term data from community groups

We oppose any automatic triggers that default to aerial culling without first investigating hunter-led alternatives.

3.5 Opposition to Unnecessary Use of 1080 or Aerial Culling

The foundation remains opposed to the use of 1080 or similar toxins for deer control within special herd areas.

These herds are recognized for their hunting value, and targeted hunter-led programmes offer fewer ecological side-effects.

Aerial culling should only be used where:

- all hunter-led options have been exhausted,
- the target is highly inaccessible, and
- iwi and relevant community groups have agreed.

4. Alignment with National Frameworks (Te Ara Ki Mua)

We endorse the alignment with Te Ara Ki Mua, which guides collaborative pest and ungulate management.

LNIRDF already operates consistently with these principles—working with DOC staff, iwi, and local hunters in shared projects on the ground.

We encourage DOC to leverage and expand these partnerships within Sika and Wapiti herd management.

5. Community Impact and Hunting Culture

Sika and Wapiti are culturally and recreationally important to thousands of New Zealanders.

Managing these herds effectively benefits:

- local economies
- hunting clubs and communities
- tourism operators
- the social fabric of rural towns
- ongoing conservation efforts through hunter participation

Recognition of these herds is a significant step forward in supporting New Zealand's hunting culture while protecting the environment.

6. Recommendations Summary

LNIRDF recommends the final plans:

1. Strengthen the role of recreational hunters in management.
2. Embed iwi partnership and co-governance throughout the process.
3. Ensure fair, transparent, and accessible ballot systems.
4. Use hunter-led management as the default method for population control.
5. Avoid reliance on aerial culling or poisons.
6. Maintain transparent ecological monitoring and public reporting.
7. Formally recognise volunteer conservation mahi by hunters.

7. Conclusion

The Lower North Island Red Deer Foundation supports the recognition of Sika and Wapiti as Herds of Special Interest and welcomes the direction of these draft plans.

We are committed to working alongside DOC, iwi, and the wider hunting community to ensure these herds are managed sustainably, ethically, and in line with both kaitiakitanga and practical, evidence-based deer management.

We appreciate the opportunity to provide this submission.

Trevor Gratton

Vice-President

s9(2)(a)

s9(2)(a)

Submitter 56

Submission Details

Overall, I disagree with the proposal for herds of special interest. Deer are not at threat in New Zealand; the forests and ecosystems that they inhabit are.

This proposal seems tone deaf to the real issues that our forests face.

I believe the minister should not proceed with the proposal and should develop a proposal for the protection of native biodiversity from the effects of deer for our forests across ALL of New Zealand. This proposal should have a native biodiversity first approach but should deeply involve the hunting sector and community.

However, if the proposal does go forward the following should be addressed:

- Stronger wording for Objective 1 to ensure the protection of ecosystem processes. The wording in its current state is unclear and does not give effect to intent of the overall proposal, in terms of protection of ecosystem processes.
- Policy 1.6 should NOT provide for the restriction of access based on poor hunter satisfaction. Public hunting access should never be restricted on public land in New Zealand for this reason. Hunters will be naturally less frequent to these areas if satisfaction is low. This will be self-managed by hunters and is not an issue this policy should address. Also, hunter satisfaction as a metric is flawed as this data is far too subjective.
- Annual operational plans must be developed in consultation with experts and advice should be received from experts on whether the plan will enable to objectives of the plan to be achieved.
- Where monitoring indicates ecosystem decline or insufficient regeneration, intensified control measures must be implemented until ecological benchmarks are met. All monitoring results should be peer reviewed by an independent suitably qualified person (ecologist). This can be included as a strategy under 2.4.
- 5.2(B) should also provide for the independent peer review of monitoring results. Annual plans must also be independently reviewed by a suitably qualified ecologist.
- The Annual Report section (5.2) MUST include a section on whether objectives of the plan have been achieved. This is not provided for currently.
- The plan does not make clear how the ecological monitoring will be funded. This forms the basis of the proposal. Without good information that clearly describes the effects of deer on ecological processes, we cannot understand if deer are being managed properly. Professional hunter funding also needs to be provided for.
- The review period should be shortened to three years. This will enable for more immediate review of whether the outcomes are being achieved.

Susan Hall - Upper Waimakariri and Rakaia Group

Submission Details

Eirwen Harris Mitchell

From: Susan Hall s9(2)(a)
Sent: Saturday, 6 December 2025 12:39 pm
To: sikaHOSIHMP
Subject: submission on Sika HOSI
Attachments: Submission on Sika HOSI - UWRG.pdf

Categories: Green Category

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

Good afternoon

Please find attached our submission on Herds of Special interest for Sika deer.

Thank you.

Kind regards
Susan Hall

Upper Waimakariri and Rakaia Group UWRG

Upper Waimakariri/Rakaia Group



Craigieburn Range

Submission on Sika (Herds of Special Interest) Management Plan.

Full name of Submitter: Upper Waimakariri/Rakaia Group (UWRG).

To the Department of Conservation
Christchurch
Email: sikahosihmp@doc.govt.nz

Background

The Upper Waimakariri/Rakaia Group (UWRG) is a community group involved in native flora, fauna, and landscape protection in the Selwyn District high country. This area includes the Arthurs Pass National Park, the Craigieburn Forest Park, and the Korowai/Torlesse Tussocklands Park. Members do regular predator trapping in our District and help with the removal of wilding pines and other pest weeds. Our interest is not confined to the Selwyn District. We value all National Parks and high value conservation land in NZ/Aotearoa.

The proposed Sika HOSI in the Kaimanawa and Kaweka Forest Parks Management Plan (the Plan).

UWRG appreciates the opportunity to provide feedback on the Plan. The group is disappointed not to be consulted on the actual process of approving the idea of a HOSI, so we begin by stating our opposition to designating HOSI in National Parks and in areas of high value conservation land.

We make the following comments on the Plan:

The objectives and strategies are too focussed on improving the health of deer species and the hunting experience, at the expense of conservation. We have seen no evidence that browsing ungulates in our forests and alpine areas has led to improved conservation outcomes. After reading several media articles recently on the population explosion of deer species around NZ, designating HOSI anywhere makes no sense.

UWRG oppose the precedent that would be set by designating sika as a HOSI. If this HOSI is established, it will pave the way for other herds of pest animals such as other feral deer species, chamois, tahr and pigs to be given special status in other National Parks. Ungulate browsing is damaging forests in our area of NZ, in Canterbury. Pest animals need to be culled, not given special status.



Deer Damage in Craigieburn Forest Park 2024

The Plan does not explain how the management of special herds will be funded. The UWRG **opposes** any taxpayer funding for hunter groups, and requests that DOC receive increased funding to urgently cull and control ungulates in national parks, and on other public conservation lands.

The monitoring and enforcement sections of the Plan are weak and not sufficient to provide assurance that ecological values will be protected.

Outcome sought

UWRG requests that no HOSI in the Kaimanawa and Kaweka Forest Parks be granted, that the proposal be declined in its entirety.

UWRG wishes to be heard in support of this submission.

Date: 6 December 2025

Susan Hall

Submission Details

Eirwen Harris Mitchell

From: Susan Hall s9(2)(a)
Sent: Thursday, 4 December 2025 8:47 am
To: sikaHOSIHMP
Subject: Sika herds of special interest
Attachments: HOSI submission Sika Dec 2025.pdf

You don't often get email from s9(2)(a) [Learn why this is important](#)
Please find attached my submission. I wish to be heard if there is the opportunity to speak.

Thank you

Kind regards
Susan Hall

s9(2)(a)

Submitter details:

Susan Hall

s9(2)(a)

I wish to be heard if there is a public submission hearing.

Thank you for the opportunity to submit on the management plan for Sika HOSI.

I am **opposed** to the idea of Herds of Special Interest.

The concept of giving special status to an introduced pest browser is an oxymoron. Deer are incredibly destructive browsers with no natural predators in New Zealand. The plans for a Sika HOSI allows our public conservation lands to become reserves for game animals, rather than concentrating on pest removal to protect our indigenous biodiversity.

Sean Husher ecologist has said “anyone suggesting that there can be a balance between satisfactory hunting for recreational hunters and forest regeneration is ecologically illiterate”.
David Williams Newsroom 19/11/2025

The hunting community regularly compare deer browsing with moa, as if they are interchangeable. Moa evolved to co-exist with our divaricating plant species, their teeth clipped the vegetation. Wapiti have lips and tongues which grasp and rip vegetation. They eat the forest from the ground up, consuming fungi, leaf litter, bark and leaves, rapidly removing the understory as far as they can reach. The carbon sequestration that normally occurs in an intact forest is replaced by the forest eventually becoming a carbon source. Heavy rainfall events cause flooding and slips and erosion of soil as the forest floor can no longer absorb the rain like a sponge.

General comments on the Management Plan (The Plan)

HOSI on public conservation land (PCL) needs to show a benefit for the NZ public. The benefits for the hunters are well explained.

Strong environmental protection needs to be prioritised. More data is required e.g. Feral deer numbers and density targets under the Plan

The Plan does not explain how it will *enhance the hunting experience and opportunities to hunt healthier animals..... and improve natural biodiversity and prevent the loss of native species from their current range.*

The cost of monitoring and enforcement should be borne by hunters, not the taxpayer. Current DOC funding must not be used.

The implementation of HOSI could restrict landscape scale predator control on public conservation land. There is also the restriction on other users of the PCL to allow safe hunting practices.

HOSI status must be subject to regular annual review and dependent on the environmental targets being met, and feral deer numbers being reduced. These data must be publically available.

HOSI must not be a permanent designation. Regular performance reviews and consultation with all stakeholders is necessary.

Derek Hartley

Submission Details

Comments

Event: Sika Herd of Special Interest Draft Herd Management Plan

Consultee Name: Mr Derek Hartley

Consultee Email: s9(2)(a)

Consultation point: Sika Herd of Special Interest Draft Herd Management Plan

General position

Support

I/We wish to make the following comments

I Strongly Support the proposed Herds of Special Interest for Sika.

The basic foundations existed from circa 1986 with the Gazettal of the Recreational Hunting Areas in Kaimanawa / Kaweka Forest Parks.

After the disestablishment of the NZ Forest Service the idea lapsed.

The Sika Foundation has expanded that concept and proved that it is Viable & Practical.

Especially with improvements in technology.

The involvement with Iwi is critical.

Politically and especially practically as their adjoining lands provide significant reservoirs of animals .

Able to reinfest control areas if they become desirable feed sources.

Sika especially Stags travel great distances during the year.

See Sika Foundation animal mapping trials.

Do you want to upload a supporting document?

No

Consultation point: Table 1.4 General recreational hunting

General position

Support

I/We wish to make the following comments

Ideally Recreational hunting can be used to management aims.

Access will need improvement for some areas. Possibly limited Heli Insertions or similar.

1.5/6 Ensure widely advertised. People are unused to restrictions in this area.

So will take time to become accepted.

Consultation point: Table 1.10 Herd management hunts

General position

Support

I/We wish to make the following comments

Maximising the available resources & offsetting costs.

Consultation point: Table 1.13 Professional control operations

General position

Support

I/We wish to make the following comments

Realistically to date this has been essential in some areas.

Consultation point: Table 2.1 Monitoring

General position

Support

I/We wish to make the following comments

Essential.

How can you know what has been achieved with out Accurate Records.

Consultation point: Table 2.4 Research

General position

Support

I/We wish to make the following comments

Knowledge is not static And Must be expanded.

However it also must be Robustly established and Challengeable.

Otherwise it can become Dogma and Stifling of Innovation.

Costs must be well managed to prevent Operating Budget suffering.

Consultation point: Table 3 Working closely with Iwi

General position

Support in part

I/We wish to make the following comments

A juggling act between Core Functions and Iwi

Consultation point: Table 4 Foster partnerships and community stewardship

General position

Support

I/We wish to make the following comments

Realistically the money has to come from somewhere.
Conflicting Interests will require careful managing.

Consultation point: Table 4.3 Stewardship

General position

Support

Consultation point: Table 5 Annual planning and reporting

General position

Support

I/We wish to make the following comments

Statutory Requirement

5.1c Carcass recovery will require very careful management or will lose the support of many people .

Being seen as a return to the period when RHA's were established to exclude commercial activity.

Stephen Michael Healy

Submission Details

Sika Foundation Sika HOSI Draft HMP Submission



The Central North Island Sika Foundation is a non-profit volunteer community organization established in 2015 as a result of increasing observations of skinny Sika and damaged forests in the central high country. It currently has some 400 members and 9,000 followers on social media, and promotes a vision of:

“A healthy sika hunting resource, thriving in resilient natural habitat, valued by stakeholders”

The fundamental foundation upon which a vision like this is based, is a healthy environment.

The Sika Foundation wishes to make the following submission in relation to the Draft Herd Management Plan for the proposed Sika Herd of Special Interest (HOSI) recently released by the Minister of Hunting & Fishing.

As the initial ‘Proposer’ of a Sika HOSI, the Sika Foundation is disappointed in the process of Draft Herd Management Plan formulation. Being given a copy of the Draft HMP just 10 days prior to the Minister’s announcement, did not allow the Foundation to have the sort of input that might have made for a more robust document. Many issues raised in our original proposal have not been incorporated in the Draft HMP.

We hope that future HOSI HMP development processes will take a more collaborative approach between the Proposer, DOC, Treaty partners and the GAC, right from the start. We also hope that the following points will help improve parts of the current Draft HMP.

1. The Sika Foundation values the Central North Island Sika herd highly. It is an important resource that forms part of the very fabric of the central high country with a rich history of providing food; recreation; adventure; connection to nature; connection to friends, family and community; and for health & well-being. The ‘value’ of Sika hunting in New Zealand is estimated to be between \$50million and \$110million per annum (Kerr & Abel, 2016). While Sika do have a consequence for native forests, and potentially in the adjoining productive landscapes, the Foundation believes active management based on sound ecological principles and a thorough understanding of Sika biology, can and will allow for a balance between values and consequences to be found. The Foundation strongly supports a Sika HOSI. The HMP must explicitly express the values of a Sika herd and the required management approaches that flow from them.
2. A Sika HOSI is not about “Control” of Sika; it is about “Active Management”. The Sika Foundation opposes use of the term ‘control’. All reference to the term ‘control’ should be removed from the HMP in preference for the term ‘management’, to reflect the reality of what a Sika HOSI HMP is trying to achieve. The ‘control’ narrative and the style of language it reflects, only reinforces previous failed approaches to managing deer in New Zealand.
3. Legal HOSI Status, for the first time in 95 years, allows for a legislative and policy framework for Sika (and deer more generally) that recognises they also have (social, cultural, recreational, educational and economic) value, not just potential negative impacts. HOSI’s are therefore, a paradigm shift in the national thinking. That is why they

are so important. The Sika Foundation wishes to highlight this critical point, as such a legal framework (finally) opens the door to more realistic and sustainable management approaches. Active game management will achieve far better outcomes for both conservation and hunting than the current 'control' approach.

4. The Sika Foundation would like to see the nine (9) proposed Management Units (MU's) in its original proposal articulated in the HMP. These MU's have been framed up as a part of the Sika Foundation's 2022 – 2025 Adaptive Deer Management and Research Plan (in collaboration with DOC). All are very different in terms of habitat, soils, climate, terrain, access, management history and hunter use. There will be no "one-size-fits-all" Sika management approach. Five out of nine management units have already received base line Seedling Ratio Index (SRI) and Faecal Pellet Index (FPI), including a remeasure after three years of active management in the Rangitikei Remote Experience Zone (REZ_MU). Another two MU's are scheduled for baseline SRI monitoring in Jan – March 2026. Sika HOSI implementation will need to consider different approaches in different places, based on varying landscape issues and differing management needs at 'place'.
5. Monitoring designs should not be too "broad scale". The impact at place from hinds living in matrilineal family groups can be very localised (100-200ha). How sika interact with the landscape and the hunting pressure needs to be a strong consideration in monitoring designs that allow a sensitive enough sample size, without risking unnecessary resource going towards areas where impacts are acceptable or conversely, not enough resource going to areas where impacts are higher.
6. In setting Ecological 'standards' or 'limits', it is important not to raise the bar so high as to set HOSI's up to fail. Beech forests can regenerate after natural canopy collapse with 5 or 6 Sika/km² (Clements Mill Road sort of density). But if having broadleaf and five-finger in the understorey is required, deer density will need to be less than 1 or 2 Sika/km². This is not a proposition that will allow for hunting outcomes. Most highly palatable plant species are supremely adapted to growing as epiphytes, so they are not lost from the system – but an expectation they turn up in SRI monitoring in the 2m+ tier is unrealistic. The Sika Foundation seeks that the Draft HMP recognises realistic ecological outcomes.
7. In setting herd management objectives, the HMP must ensure the 'specialness' of the Sika herd for hunters is specifically articulated and then actively maintained. There will need to be specific measures of this identified in the HMP. The Sika Foundation already has well developed, proven systems in place (eg., jaw collection; 30+ years of stag age vs antler development data from the annual Sika Show; necropsy assessment criteria; detailed hunter data forms) for many relevant parameters. The Sika Foundation does not believe FPI is a useful or relevant measure. Herd and hunting outcome measures that should be included in the HMP are:
 - a. increasing average body condition scores (generally)
 - b. increasing average age in males
 - c. increasing average size & quality of antlers
 - d. decreasing average age in females
 - e. increasing reproductive output (fawns per female) – this will help increase sika hunter harvest rates of younger, more naive deer
 - f. sika encounter / harvest rates (generally)

8. Hunter satisfaction will also need to be quantified & tracked with specific surveys that seek feedback on the above measures and/or other measurable hunting outcomes. These are likely to change over time as active management takes effect.
9. The current DRAFT HMP does not make any mention of neighbouring land – it is focused only on the relevant PCL. It is well known that certain age & sex classes of the sika herd (especially mature stags) trade seasonally between high nutrition habitats (like pine plantation, Defence Reserve, farming landscape, private alpine wilderness) and the proposed Sika HOSI Public Conservation Land (PCL) (Herries et. al, 2025). While HOSI Status would not bind neighbours in any way, acknowledging them; the role they play; and a need to work collaboratively with them, will be VERY important during Sika HOSI implementation to provide for across boundary approaches. It will also create greater opportunity for the wider Sika herd, adjoining Sika habitats and the Sika hunting community.
10. In acknowledging the need to work collaboratively with Treaty Partners, their role both in holding Mana Whenua over the relevant PCL and as important neighbours will also require the development of strong management relationships for culturally appropriate AND across-boundary approaches . A Sika HOSI will only work if it includes such collaboration. This must, therefore, be explicitly addressed in any HMP.
11. Funding will need to be an ongoing consideration. Sika hunters want to be able to hunt freely in an open system. The Sika Foundation has heard strongly from the Sika hunting community that they would be very concerned if fees to hunt or widespread balloting were implemented. However, there will be a need to think about managing hunter numbers in **some places** to spread the hunting effort equitably and more efficiently during high use periods (eg., the rut). This could provide opportunity for revenue where hunters receive an elevated benefit over and above current (free and open) hunting access opportunities. However, the SF does not support fees for general Sika authorisations or generalised balloting. Any Fees raised from any Sika HOSI management (that offers additional hunter benefit) need to be spent on a Sika HOSI, not diverted to crown agencies or to central Govt accounts (eg., as DOC Hut and/or commercial concession fees are).
12. Sika Foundation believes there is a fair and reasonable justification for the Crown (NZ Government) to cover the cost of some (yet to be determined) proportion of any herd reduction operations (where ecological monitoring data shows these might be required) and the habitat monitoring costs themselves, due to the conservation benefit that will result.
13. Sika HOSI Authorisations should sit outside DOC as there remains relationship & trust issues with hunters around DOC's historic role and performance with game animals. Independent authorisations through a system/agency that better understands and/or connects to sika hunters will likely result in greater compliance; more accurate data submission by hunters; and hence, a more accurate understanding of hunting outcomes, herd health, the potential for deer impact and/or the need for herd density/structure adjustments.
14. There will also be a need for third party (independent) monitoring design and assessments of ecological outcomes (eg, SRI monitoring) to ensure all stakeholders can

be confident that data reflects the actual ecological state. This will avoid the perception that a particular design/analysis/reporting approach supports any specific narrative around deer impact (either positive or negative).

15. The respective DOC/GAC/Sika Foundation/Mana Whenua/Community roles and responsibilities need to be clearly articulated in the HMP. The Sika Foundation does not believe DOC should Implement the HMP on behalf of the Minister for Hunting and Fishing. Appropriate delegations need to be given to ensure the right functions fall in the right places, where the most appropriate knowledge, relationships and skill-sets lie. In the view of the Sika Foundation, a Sika HOSI HMP should enable hunter, Mana Whenua and community-led management to achieve appropriate social, cultural and ecological outcomes. The suggested hierarchy for respective roles should be: DOC enabled; GAC supported; Community-led.

References:

Dan Herries, M. Cecilia Latham , Campbell Speedy and A. David M. Latham – 2025: Home ranges and movement of sika deer (*Cervus nippon*) in central North Island, New Zealand. New Zealand Journal of Ecology (2025) 49(1): 3615

Kerr, G. N., Abel, W. – 2016: What are they hunting for? Investigating heterogeneity among sika deer (*Cervus nippon*) hunters. Wildlife Research, 2016, 43,69–79
<http://dx.doi.org/10.1071/WR15117>

A handwritten signature in black ink, appearing to read 'John Cook', written in a cursive style.

John Cook
Sika Foundation President

Natalie Hinke

Submission Details

Emma Bennett

From: Natalie Hinke s9(2)(a)
Sent: Monday, 24 November 2025 8:52 pm
To: sikaHOSIHMP
Subject: Submission on the Sika Deer Herd of Special Interest Draft Herd Management Plan
Attachments: 2025-11-24_Hinke_Submission on the Draft Plan for HOSI.pdf
Categories: Green Category

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

Tēnā koutou,

I have attached my submission on the **Draft Herd Management Plan for the Proposed Sika Deer Herd of Special Interest** in the Kaimanawa and Kaweka Forest Parks and the Kaweka Conservation Area.

Because this proposal may become one of New Zealand's **first-ever HOSI designations**, the standard set here will shape policy, expectations, and conservation outcomes across the country. It is therefore critical that the final Plan is far more rigorous, precise, and accountable than the current draft.

In my submission, I emphasise several overarching concerns:

1. This Plan sets a national precedent — and must be exemplary, not merely functional.

A Sika HOSI would fundamentally reshape how introduced game animals are managed on public conservation land. If the framework is vague or overly permissive, it risks lowering ecological protections not only in the central North Island, but in all future HOSI areas.

2. The Plan's ecological provisions are not strong enough.

Clearer, measurable ecological thresholds are required — not just monitoring indicators. Without explicit performance criteria for vegetation recovery, browse reduction, and biodiversity improvement, the HOSI risks becoming a symbolic designation rather than a conservation tool.

3. Treaty partnership must be embedded, not peripheral.

Iwi involvement cannot be limited to consultation. Co-governance, shared monitoring, and cultural values must sit at the core of the management structure if the Plan is to meet its Treaty responsibilities.

4. Enforcement and compliance require real resourcing.

Rules and penalties mean little without visible and well-funded enforcement. The Plan must clearly identify how compliance will be delivered on the ground, especially during high-use periods.

5. Financial transparency and sustainability are essential.

A multi-year budget and clear funding commitments are required to ensure that ecological monitoring, enforcement, and herd management can actually be delivered.

In short, I support the concept of a Sika Deer Herd of Special Interest **only if the Plan is significantly strengthened**. A HOSI should raise the bar for conservation and game management — not weaken it. Anything less risks compromising both ecological integrity and public trust.

Thank you for the opportunity to provide feedback. I would welcome further engagement as this proposal progresses.

Ngā mihi nui,

Natalie Hinke

s9(2)(a) [Redacted]
s9(2)(a) [Redacted]
s9(2)(a) [Redacted]
s9(2)(a) [Redacted]
s9(2)(a) [Redacted]

Submission on the Draft Herd Management Plan for the Proposed Sika Deer Herd of Special Interest (HOSI)

To: Department of Conservation / Minister for Hunting & Fishing

From: Natalie Hinke, recreational hunter and volunteer in several environmental projects in NZ

Date: 24.11.2025

Introduction

Thank you for the opportunity to submit on the *Sika Herd of Special Interest Draft Herd Management Plan*. I appreciate DOC's effort to develop a framework that balances both recreational hunting and conservation values in the Kaimanawa Forest Park, Kaweka Forest Park, and the Kaweka Conservation Area.

In my view, the proposal has significant merit, but there are several areas where clarity, ambition, and safeguards could be strengthened to ensure ecological, cultural, and social outcomes are robust and enduring.

Key Points of Support

1. Balanced Objectives

- The Plan explicitly aims to *enhance the recreational hunting experience* (healthier animals, better quality) while also *improving natural biodiversity and forest regeneration*.
- This dual objective is important: it recognizes that hunters can be vital conservation partners rather than being purely extractive, which is in line with modern, adaptive wildlife management.

2. Adaptive Management and Monitoring

- I strongly support the adaptive management approach: setting annual management targets, ongoing monitoring, and the use of ecological indicators (e.g., seedling ratio index, permanent plots) to evaluate forest regeneration.
- The commitment to publicly report annually is also very positive: transparency builds trust, especially with local communities, Treaty partners, and hunters.

3. Partnerships and Iwi Involvement

- The Plan gives appropriate emphasis to working with local iwi (Ngāti Tūwharetoa, Ngāti Whitikaupēka, Ngāti Tamakōpiri, and others) to integrate tikanga, mātauranga Māori, and cultural values in deer management.
- Encouraging community stewardship (hunter education, conservation volunteering) is very welcome. Strategies to foster this (hunter training, predator trapping, infrastructure) are well thought through.

4. Legal and Policy Consistency

- The Plan acknowledges and aligns with “overriding considerations” under the Game Animal Council Act, as well as with existing conservation strategies (e.g., Kaimanawa Forest Park Management Plan, Kaweka Forest Park CMP).
- Review every five years ensures that management can be adjusted based on outcomes and new science

Concerns & Recommendations

While largely supportive, I have several concerns and suggestions to improve the Plan and better safeguard conservation outcomes:

1. Stronger Ecological Targets

- The Plan currently avoids setting very specific density or population targets (e.g., animal density per hectare) for sika. While I appreciate the challenges of variability in terrain, habitat, and deer behavior, more explicit interim ecological goals would increase confidence.
- Suggestion: Define interim ecological benchmarks (e.g., maintaining or improving seedling recruitment rates, reducing browse pressure on key beech species) in annual operational plans. These benchmarks should be adaptive but more concrete than “positive change / no net decline.”

2. Risk of Over-Herding & Gene Pool Issues

- Managing solely for “healthier animals” and “trophy quality” risks favoring particular age / sex classes (e.g., large stags) at the expense of genetic diversity or demographic stability.
- Suggestion: Incorporate in monitoring a genetic or demographic component (e.g., age-structure, sex ratio) to ensure selective harvest does not undermine long-term herd resilience.

3. Movement Across Boundaries

- According to DOC’s own briefing, movement of sika into / out of the proposed HOSI area (adjacent private land) is a “key issue” that needs more robust planning.
- Suggestion: Explicitly include in the Plan strategies to monitor and manage cross-boundary movements, possibly via collaring / telemetry or coordinated control with adjoining landowners, to avoid “spillover” undermining control efforts or conservation goals.

4. Cultural and Biodiversity Risk Assessment

- While the Plan mentions cultural values and taonga species, there is limited detail on specific risks to vulnerable native flora / fauna (e.g., rare invertebrates, snails, ground flora) from deer browsing.

- Suggestion: Commission or require a more detailed “cultural and biodiversity risk assessment” as part of the first operational plan, in partnership with iwi. This assessment should guide where professional control, hunter effort, or access restrictions are most needed to protect sensitive areas.

5. Enforcement and Compliance

- The Plan provides for enforcement under the Game Animal Council Act (e.g., officers, fines up to \$5,000 for unauthorized hunting). But enforcement is only effective if resourced and visible.
- Suggestion: Clearly identify in the annual operational plans how enforcement will be resourced, including number of enforcement officers, patrol frequency, community reporting mechanisms, and how DOC will ensure compliance (especially during high-demand seasons, such as the rut).

6. Funding Transparency & Sustainability

- Public and community trust would be enhanced by clearer financial reporting. The Plan’s strategy to include financial reporting in annual reports is good, but more detail would help.
- Suggestion: Disclose expected costs per operational plan (control, monitoring, reporting, enforcement) and the share contributed by DOC, the Sika Foundation, hunters, and other partners. Include a long-term funding strategy that ensures financial sustainability beyond initial years.

7. Public and Recreational Access

- The Plan allows for open hunting unless there are safety or demand issues. However, greater clarity is needed about how access will be managed, especially in more remote or sensitive ecological zones.
- Suggestion: Define clear criteria in the Plan (or in annual ops) for when and how access restrictions or booking systems (e.g., ballot in the REZ) will be applied, to ensure safe, equitable, and conservation-aligned hunting opportunities.

8. Reporting Back to Communities and Treaty Partners

- While the Plan commits to presenting annual reports to iwi and conservation boards, it may also be beneficial to hold periodic public hui / workshops.
- Suggestion: Establish a “Sika Management Forum” (or use the proposed iwi / hapū forum) that meets at least annually with DOC, the Sika Foundation, and other stakeholders to review results, discuss challenges, and adapt strategies.

Broader Considerations

- I acknowledge that the Sika HOSI, if approved, would likely become New Zealand’s first Herd of Special Interest under the Game Animal Council Act. This is a precedent-setting opportunity.

- It is critical that the Plan not just favor short-term hunting benefits, but deliver real ecological gains (forest regeneration, native biodiversity recovery) and genuine co-governance with iwi / hapū.
 - Given concerns raised by conservation NGOs (for example, Forest & Bird has expressed the risk that HOSI status may compromise conservation values) the final Plan must demonstrate robust safeguards, transparency, and accountability.
-

Conclusion

In conclusion, I **support** the designation of a Sika Herd of Special Interest in the Kaimanawa / Kaweka area, because this Plan, done well, offers a new, constructive model for balancing hunting and conservation. However, to ensure long-term ecological and cultural resilience, I urge DOC and the Minister to strengthen the Plan by:

- Defining clearer ecological benchmarks;
- Managing demographic and genetic risks in the herd;
- Accounting for cross-boundary deer movement;
- Deepening cultural and biodiversity risk assessment;
- Ensuring enforcement is properly resourced;
- Being transparent about funding;
- Managing access thoughtfully; and
- Engaging communities and Treaty partners in iterative governance.

Thank you for considering my submission. I would welcome the opportunity to remain involved as the Plan develops, including through stakeholder forums or annual reporting.

Ngā mihi nui,



Natalie Hinke

s9(2)(a)

s9(2)(a)

s9(2)(a)

s9(2)(a)

s9(2)(a)

Barbara Hughes

Submission Details

Eirwen Harris Mitchell

From: DOC Info
Sent: Wednesday, 10 December 2025 5:39 pm
To: sikaHOSIHMP
Subject: FW: Kidding that deer protected ????? CRM:0895331

Categories: Orange Category, Green Category

Hi,

Passing this feedback on to you. I have not responded to the customer.

Kind regards,

s9(2)(a)

s9(2)(a)

s9(2)(a)

Phone: 0800 ASK DOC (0800 275 362)

www.doc.govt.nz



Department of
Conservation
Te Papa Atawhai

----- Original Message -----

From: Barbara Hughes s9(2)(a)
Received: Mon Dec 08 2025 18:53:13 GMT+1300 (New Zealand Daylight Time)
To: DOC CSC <info@doc.govt.nz>; Customer Service Centre <info@doc.govt.nz>; Forest & Bird <office@forestandbird.org.nz>; S.Watts s9(2)(a); C.Penk s9(2)(a); Chloe.Swarbrick s9(2)(a); greg.fleming s9(2)(a); Priyanca.Radhakrishnan s9(2)(a); Chris.Hipkins s9(2)(a); Christopher.Luxon s9(2)(a); greg.fleming s9(2)(a); SikaHerdOfSpecialInterest@doc.govt.nz;
Subject: Kidding that deer protected ?????

You don't often get email from s9(2)(a) [Learn why this is important](#)
Hon Minister James Meager and other Honourables.

Absolutely totally shocked yesterday to hear you are protecting deer. Good grief you have to be kidding. Why for gods sake?

What next is this Govt coming out with; a token appalling marine protection bill for Hauraki Gulf allowing far too much fishing and still trawling, PM Luxon stating cats to be protected - sure did a back flip on that with a flurry of emails from pest control community National voters, pigs kept in cruel disgusting crates, back track and no focus on the climate change hitting us right now - just

look at the temperature and fires happening, NZ First planning to charge into Denniston plateau and now this one!

Deer are a total pest of our forests. James, have you been for a walk through Fiordland forests? Below the canopy, that is the tallest trees in case politicians do not know ecology terms, is bare, eaten out.

Years back when tramping in that area the Forest Service was doing a great job of culling deer. I never spotted any during our tramps. But a trumper reported last week seeing groups of deer during the day in Greenstone area. There was a TV programme, recently on farmers trying to cull many deer at their own expense, huge numbers being shot each night of culling on their farmland and that was not right in the deep bush areas. The numbers are huge and doing so much damage to the native and endemic fauna and flora.

Is this another Act Party or NZ First loopy push that National happily caves into?

All note; I do not agree with giving deer any type of legal protection on our conservation land. However, sadly it looks like this decision is already going ahead, so these are the non-negotiable conditions that must be met:

- Independent ecological monitoring by neutral ecologists.
- Strict 5-year review cycles to reassess deer numbers and ecosystem health.
- Annual public reporting on ecosystem impacts.
- No restrictions on pest-control operations.
- Mandatory large-scale deer culls if ecological health declines.
- Scrap the whole HOSI when it doesn't meet these targets in 5 years.

All that this Govt is are doing is total environmental terrorism. You will be held accountable.

Ngā mihi nui
Barbara Hughes

Stewart Hydes - NZDA Rakaia Branch

Submission Details

Eirwen Harris Mitchell

From: s9(2)(a) m
Sent: Monday, 8 December 2025 11:17 pm
To: sikaHOSIHMP
Subject: Submission on Fiordland Wapiti and Sika Herds of Special Interest Draft Management Plans

Categories: Green Category

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Introduction

New Zealand Deerstalkers Association

Founded in 1938, the New Zealand Deerstalkers Association Inc. (NZDA) advocates on behalf of New Zealand's recreational hunters and shooters – especially those who hunt big game, and its' members spread across almost 50 Branches around New Zealand. NZDA - by virtue of its large Membership, and it's broad coverage of Branches across the country - is the pre-eminent voluntary organisation representing Recreational Hunters of game animals, in New Zealand.

NZDA's Rakaia Branch

NZDA's Rakaia Branch was established in 1959.

As one of NZDA's Branches, Rakaia Branch provides for it's 100-odd Members.

Our Submission

We support the process of establishing the Fiordland Wapiti and Sika Herds of Special Interest, and development of the relevant Management Plans.

As volunteers (who are far more interested in being out hunting), we lack the time available to make a detailed Submission - so we can only offer our support for the Submissions made by the NZDA, the Fiordland Wapiti Foundation, and the Sika Foundation.

We would like to adopt their Submissions, and have them form part of our Submission, in their entirety.

Having said that, we also offer our services as Recreational Hunters in the execution of the Management Plan, to the extent that we are able, and enabled, to do so.

Recreational Hunters are the only unpaid volunteers who actually contribute their considerable, voluntary time and resources to large-scale population management of wild, introduced species here in New Zealand.

Collectively, Recreational Hunters harvest in the order of 150-200,000 "big game" animals (deer, tahr, pigs and chamois) per annum - and literally into the millions of other critters. This includes species such as rabbits, hares, possums, goats, wallabies, ducks, geese, feral cats, mustelids .. amongst others. Virtually any wild, introduced species of interest you can name - we have an impact.

We know what we are talking about, and "we put our money where are mouths are".

Our efforts are at No Cost to taxpayers and ratepayers.

We invest into state-of -the-art technology and equipment, and we can be highly effective. As an example (albeit with a different species) 6 of our members recently harvested 601 Wallabies in a single, all-out weekend.

Collectively, as Recreational Hunters, we employ our billions of dollars worth of recreational assets .. along with the hundreds of millions of dollars we spend every year .. and the millions of voluntary hours we expend year-in and year-out .. to good effect.

Properly enabled, we can make a significant difference - more significant than any other interest group in this space, by far.

We are an under-utilized resource, with considerable, untapped potential to do much, much more.

We already work with all willing, interested stakeholders - and we would like to improve the nature of these working relationships, so we can do more.

All we need is the legislative, regulatory, and policy framework that enables us to apply our time and resources effectively (including appropriate access, and the right to use the most effective tools where they are needed most) .. and we will do the rest.

We cannot help ourselves.

It is what we do.

Designation of Wapiti and Sika as HOSI's - and development of the right Management Plans - will help enormously in enabling Recreational Hunters to "get the job done".

On behalf of NZDA - Rakaia Branch.

Kind Regards,
Stewart Hydes
Submissions Officer
NZDA - Rakaia Branch.

s9(2)(a)

s9(2)(a)

Corina Jordan - Game Animal Council

Submission Details

Eirwen Harris Mitchell

From: Corina Jordan s9(2)(a)
Sent: Monday, 8 December 2025 4:29 pm
To: sikaHOSIHMP; James Meager (MIN)
Cc: Kaylyn Pinney; DLVC_NEW ZEALAND GAME ANIMAL COUNCIL; Grant Dodson
Subject: Game Animal Council Submission on the Sika draft Herd Management Plan
Attachments: Appendix B_Marked up version_draft Sika HMP.docx; Appendix A_Requested changes table_Sika.pdf; GAC Submission - Sika HMP_Final.pdf

Categories: Green Category

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

Good afternoon,

Please find attached the Game Animal Council submission on the draft Sika Herd Management Plan.

The Game Animal Council welcomes further engagement on the finalisation of the HMP, and is happy to chat through its submission and offer ongoing expert support and advice.

Ngā mihi

Corina Jordan
Chief Executive Officer
[New Zealand Game Animal Council](#)
s9(2)(a)
<https://nzgameanimalcouncil.org.nz/>



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hunter education
betterhunting.nz

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08 December 2025

Sika HOSI Draft HMP Submissions
C/- Department of Conservation
PO Box 4715
Christchurch 8140

sikahosihmp@doc.govt.nz

Submission: Draft Herd Management Plan for the Sika Herd of Special Interest

Executive summary

The Game Animal Council (GAC) supports the designation of a Sika Herd of Special Interest (HOSI), and advocates for a values-based, adaptive, and sustainable management approach that balances hunting and conservation outcomes.

This submission sets out the GAC's position on the Draft Sika Herd Management Plan (HMP), released for consultation by DOC on 10th November 2025.

The Game Animal Council supports the Sika Herd Management Plan as amended by this submission, including Appendix A and B, and the submission of the Sika Foundation.

We have significant concerns that the current draft HMP does not reflect the intent or requirements of the Game Animal Council Act 2013 (GAC Act). It inappropriately resembles a Wild Animal Control Plan focused on control and eradication. Substantial changes are needed to the HMP to bring it in line with the GAC Act, including shifting the plan's framework from control to sustainable herd management, and embedding genuine adaptive management principles.

We are disappointed that the HMP does not reflect the substantial work and feedback we contributed early in the drafting process, including the values based HMP framework we provided that fulfils the requirements of the GAC Act.

This submission sets out our concerns with compliance with the GAC Act (Sections 3 to 5), sets out changes and the reasons the changes are needed (Appendix A) and the minimum wording changes required to reflect that (Appendix B). It includes substantial information

on what constitutes sustainable game animal management that meets the requirements of the GACA (Appendix C) and provides a template for an adaptive management approach consistent with those requirements (Section 6.2).

Adopting the recommended changes will enable an effective, legally compliant, and balanced management plan for the sika herd, supporting high-quality recreational hunting and conservation values.

1 The Game Animal Council

1. The GAC, established under the Game Animal Council Act 2013 (GAC Act), is a statutory entity with responsibilities for, among other things:
 - Advising and making recommendations concerning game animals and hunting to the Minister for Hunting and Fishing (previously Minister of Conservation).
 - Raising awareness of the views of the hunting sector.
 - Liaising with the Department of Conservation (DOC) and private landowners to enhance game animal management and hunting practices.
 - Managing HOSI, in accordance with Ministerial delegations, in a way that is compatible with the management of public conservation land and resources.
2. We are a collaborative organisation and prioritise ground-up conservation and game animal management efforts. We value place-based relationships and recognise the value of working with iwi, hapū and communities to achieve conservation and hunting outcomes.

2 Overarching position

3. We support the HOSI concept under the GAC Act and are committed to the sustainable management of valued game animals.
4. We aim to ensure the HMP is compliant with the GAC Act and fit for purpose, by facilitating adaptive and sustainable management. It should not function as a Wild Animal Control Plan under the Wild Animal Control Act 1977 (WAC Act).
5. We would like to work with you further on the content of this submission so we can achieve a HMP that is consistent with the GAC Act, and reflects hunting values and the principles of sustainable game animal management.

3 The relationship between the HMP and the GAC

6. A herd management plan binds the GAC (s19(7)).¹ This necessarily means that any HMP must be consistent with the GAC's functions in s 7, including the exercise of its powers for the effective management of the herd that forms a HOSI. If a HMP does not reflect effective herd management, the GAC cannot meet that statutory function.
7. The current draft HMP will be problematic for us from this perspective because it currently does not adequately reflect effective herd management or the interests of hunters. Not only will this impede our ability to achieve our function under s 7(i)(ii), it will also negatively impact the hunting sector more broadly.
8. This is disappointing, because we made every attempt to engage constructively with DOC throughout the development of the HMP. This includes providing detailed comments on a draft HMP, providing a values based template for a HMP that is consistent with GAC Act, and making our experts available to provide sustainable game animal management expertise. In addition, and consistent with its other statutory functions, the GAC has worked with the Foundation to prepare a comprehensive HOSI application, which reflects the values and sustainable game animal management principles that the HMP should embody.
9. We consider that the GAC's feedback on the draft HMP should have been given greater weight, because we are bound by the final version and we are ultimately the organisation best placed to implement it. The HMP will have major implications on our ability to undertake our statutory functions. There is a potential legal risk if the HMP prevents the Council from acting consistently with those functions.

3.1 The HMP must enable the GAC to achieve effective herd management

10. Further changes are required to the HMP, not only for consistency with the GAC's functions, but also to give effect to the powers that may be delegated to the GAC under s 18, and the requirement in s 16(3)(e) that a HOSI designation will result in benefits from managing the animals for hunting purposes. The HMP must be amended so that it aligns with the sustainable herd management framework of the GAC Act.

¹ Except where indicated otherwise, all statutory references in this document are to the Game Animal Council Act 2013.

11. The purpose of the GAC Act is, amongst other things, to empower the GAC to fulfil its functions, and to manage HOSI (s3).

12. The GAC has broad functions relating to the hunting sector generally, and the management of HOSI specifically. The GAC's functions in relation to HOSI are (s7(i)):

- To undertake management functions compatible with the management of public conservation land,
- To exercise powers for effective herd management.

13. The Minister may delegate any of the powers listed in s 18, except s 18(1)(e), to the GAC (s20).² The Minister's powers in relation to game animals and HOSI include (s18):

- regulating hunting by various means, and
- authorising operations for managing and controlling the size of the population of game animals .

14. The powers in s 18 may only be delegated to GAC if the Minister is satisfied that management by the Council of the herd to which the delegation relates is consistent with the overriding considerations, and *will improve the management of the herd* (s20(6)(b)).³

15. A HOSI may be designated if the animals are of special interest to hunters, and the designation will produce expected benefits through *managing the animals for hunting purposes* (16(3)(e)).

16. While the Minister must have regard to the purposes of the WAC Act when designating a HOSI,⁴ wild animal control plans and statements of general policy under that Act do not prevail over the GAC Act.⁵ Furthermore, s 19 does not require that a Herd Management Plan be consistent with or adopt the provisions of the WAC Act.

17. The GAC Act does not contemplate the eradication of game animals in a HOSI. Rather, the Act requires the sustainable management of the herd. While the Minister is required

² The Minister may not delegate the power to capture, convey or liberate game animals to the GAC (s 20(1)).

³ The GAC must exercise those delegated powers consistent with the overriding considerations (s21(b)(ii)).

⁴ s 16(1)(b)(i).

⁵ WAC Act, s 5A(1).

to have regard to the purpose of the WAC Act when designating a HOSI, that is fundamentally different from drafting an HMP based on the provisions of the WAC Act. Sustainable management under the GAC Act should be distinguished from merely adopting a Control Plan framework, as has been done in the current draft HMP.

4 The HMP must be consistent with its governing legislation

18. The WAC Act reflects a focus on conservation through the control and eradication of wild animals, using concerted action and coordination of hunting and commercial operations.⁶
19. In contrast, the GAC Act advances the sustainable management of game animals for hunting purposes. Game animals in a HOSI are managed to optimise the values of both hunting and conservation, through effective herd management.
20. The draft HMP resembles a Wild Animal Control Plan (Control Plan) prepared under the WAC Act. It frequently adopts WAC Act terminology, such as ‘control targets’ and ‘professional control operations’. These terms reflect specific mechanisms in the WAC Act that seek to achieve suppression or eradication. Those terms are not used in the GAC Act, nor are they consistent with sustainable animal management that is required to give effect to the GAC Act.
21. There is a legal risk if the HMP adopts the terminology or mechanisms of the WAC Act and not the GAC Act. As noted above, the Minister is required to have regard to the **purpose** of the WAC Act when designating a HOSI. But there is no statutory requirement for the HMP itself be drafted in a manner that is based on the specific provisions of the WAC Act. Nor would this be achievable given the exclusion of HOSI from the WAC Act’s definition of “wild animal”.⁷
22. Table 1 below summarises the key differences between the GAC Act and the WAC Act.

⁶ The purpose of WAC Act is to control wild animals, and to eradicate them where necessary (s4(1)). All its tools must be used having regard to that purpose (s4(2)). The tools under the WAC Act are used to ensure “concerted action against the damaging effects of wild animals”, co-ordinate hunting measures to control or eradicate wild animals and regulate recreational and commercial hunting and recovery operations.

⁷ WAC Act, s 2(1), definition of “wild animal”.

Table 1: High level comparison of the relevant provisions of the GAC Act and WAC Act

Feature	Game Animal Council Act (GAC Act)	Wild Animal Control Act (WAC Act)
Legislative basis	Game Animal Council Act 2013, specifically the Herds of Special Interest provisions (ss 16-20).	Wild Animal Control Act 1977.
Applies to	Game animals (chamois, deer, tahr, wild pigs)	Wild animals (chamois, deer, tahr, wild pigs, goats), excluding animals that are designated as a HOSI under the GAC Act.
Legal status of sika	Once designated as a HOSI, a resource of special interest to hunters, to be managed for hunting purposes consistent with overriding considerations.	A harmful introduced species to be controlled or eradicated.
Legislative purpose	Managing herds of special interest for hunting purposes in a manner that is consistent with the overriding considerations.	Controlling wild animals, and eradicating them where necessary, through co-ordination of control methods, including hunting.
Management plan purpose	HMP sets out objectives and strategies to achieve the benefits of HOSI by managing the herd for hunting purposes.	No legislative direction for contents or requirements of wild animal control plans. Must have regard to purpose of controlling or eradicating wild animals.
Primary philosophy	Sika are viewed as a valued resource (for recreation/food) that must be managed sustainably for hunting purposes consistent with the overriding considerations.	Sika are viewed solely as an ecological threat to be reduced or eradicated.

4.1 The HMP must achieve effective herd management, for hunting purposes

23. A herd management plan must reflect the expected benefits of managing the animals for hunting purposes (s19(3)). Because a herd management plan binds the GAC (s19(7)), it must be consistent with the GAC's statutory functions. Any inconsistency will result in legal risk: it will either fetter the Council's ability to exercise its function of achieving effective herd management of HOSI under s7(i)(ii), or the Council will be unable to comply with the HMP despite being bound by the Plan under s 19(7). In blunt terms, the GAC cannot effectively manage a HOSI if the HMP directs the control or eradication of that HOSI.

4.2 Effective herd management achieves hunting and conservation goals

24. While "effective herd management" is not defined in the GAC Act, the Act is clear that it requires the management of a herd of special interest to hunters, to advance hunting purposes and manage the animals in a manner consistent with the overriding considerations.

25. The functions of the GAC and the powers in relation to HOSI reflect dual goals, to manage hunting to achieve both;

- benefits for hunting values (s 16(1)(a)(i) and (ii)), and
- consistency with the overriding considerations that affect conservation land (s 16(1)(a)(iii) and (b)).

26. To designate a HOSI, the Minister must be satisfied that the animals are of special interest to hunters, and there must be an expected benefit of managing the animals for hunting purposes. These provisions prioritise the interests of hunters and management of the animals for hunting purposes. Their implementation must be consistent with the overriding considerations. As noted above, the Minister must also have regard to the purpose of the WAC Act when designating a HOSI.

27. An HMP is required for the Minister to designate a HOSI. The purpose of the HMP is consistent with the parameters governing the designation of a HOSI: it is to achieve the expected benefits of managing the animals for hunting purposes (s19(3)).

28. Changes required for consistency with the GAC Act:

- Amend the HMP so that it reflects the GAC Act’s focus on effective herd management, not the WAC Act’s specific provisions relating to eradication and control.
- Draft future HMPs using the values based template prepared by GAC, and ensure they align with the Principles of Quality Game Animal Management, set out in Appendix C.
- Amend this HMP so it explicitly provides for the sustainable management of the HOSI for hunting purposes in a manner consistent with the overriding considerations.
- Remove all animal control language from the HMP. For example, references in the draft HMP to ‘control target’ should be replaced with language such as ‘herd management target’ or ‘sustainable harvest target’ so that the Plan is consistent with the GAC Act.
- Amend the Objectives of the HMP so that they reflect the values of the herd;
- Amend the Objectives of the HMP so that ecological objectives are directly related to the management of the herd ie deer browse, and do not set up obligations which are unachievable while sustainably managing the herd for its values.

29. These changes are not semantic. They are essential to mitigate legal risk.

5 The importance of overriding considerations

30. The draft HMP states:

This Plan has been prepared to be consistent with the overriding considerations identified in the Game Animal Council Act. (s 1, p 4).

31. The Minister may delegate s 18 powers to the GAC, if the Minister is satisfied that management of the HOSI by the GAC is consistent with the overriding considerations (s20(6)(b)(i)). The HMP must also be consistent with the overriding considerations (s 19(4)).

32. There is no explanation or analysis in the current draft about the means of achieving consistency with the overriding considerations. This presents a further legal risk. It also presents a risk to the Minister should he exercise his power to delegate s 18 functions to the GAC.
33. We reiterate our request that the analysis of consistency with the overriding considerations be made public. This is important in the interests of transparency and to provide an opportunity to address any concerns about inconsistency before the HMP is finalised.

Changes required:

- A full Overriding Considerations Policy Analysis should be made available to the Game Animal Council and Foundations, before the HMP is finalised to provide necessary legal grounding and transparency.

6 Next steps

34. Our submission points above detail our primary concerns with the draft HMP, and should be read in tandem with the critical changes in Appendix A. These required changes are the bare minimum to ensure the HMP does not constrain the functions of the GAC to an unworkable management framework.
35. Our preference would be for the GAC to have the delegated authority to develop a draft HMP for the Sika HOSI, and for DOC to lead the statutory phase of this process. We have developed a framework that would result in a values-based HMP that gives effect to adaptive, good game animal management principles and that appropriately considers the overriding considerations, as well as providing a framework for engaging with tangata whenua and the reflection of their values and aspirations.
36. In addition, we have started building a good working relationship with tangata whenua of the Sika HOSI area and would like to see the principle of partnership under Te Tiriti reflected more genuinely in the HMP.
37. Unfortunately, due to time and engagement constraints, we were unable to develop an alternative HMP within the submission period. However, we would like to note that a values-based HMP template and adaptive management plan for the Sika HOSI was provided to DOC prior to the draft HMP being released for consultation.

38. The sections below detail amendments to the HMP that go beyond the critical changes (Appendix A). The recommended amendments would require a re-work of the HMP to embed principles of quality game management and adaptive management.

6.1 The chain of logic

39. There is currently a structural disconnect between the high-level aspirations of the plans and the operational mechanisms intended to deliver them. For a HMP to be robust, defensible, and effective, there must be a clear, unbroken line of sight from the key values to the specific management actions (strategies).

40. We would like to see the final HMP adhere to a hierarchical framework where values inform objectives, and objectives inform strategies. This ensures that every action taken on the ground can be traced back to a fundamental purpose.

- Values (the why): These are the foundational pillars (e.g., hunting values, conservation values, cultural values). They provide the mandate for management.
- Objectives (the what): These are the tangible outcomes required to uphold the values. They must be specific and derived directly from the values.
- Strategies (the how): These are the mechanisms used to achieve the objectives.

41. Currently, the draft HMP presents strategies that appear disconnected from the stated objectives, or objectives that do not fully encompass the stated values. The HMP structure must explicitly map these relationships. No strategy should exist without a parent objective, and no objective should exist without a parent value.

6.2 Effective Game Animal Management for hunting purposes requires adaptive management.

42. Game animal management for hunting purposes is the systematic application of ecological, biological, and socio-economic principles to regulate and sustain populations of legally designated game species in a manner that supports hunting and is consistent with conservation goals.

43. It involves monitoring population dynamics, setting harvest targets, implementing habitat management, and manipulating demographic structure to ensure that hunting activities are both sustainable and aligned with conservation objectives. Demographic

structure relates to animal density or abundance, herd structure in relation to habitat use, and browse impacts across variable landscape composition, e.g., forest structures, alpine areas, etc.

44. Effective game animal management considers hunter values, hunter access, species distribution, and behavioural ecology to meet hunting demand while supporting long-term population management.
45. Implementing effective herd management is a long-term undertaking that will be delivered over time rather than at a single point in time. Some objectives may be achieved fairly quickly, e.g., hunter perception of regulatory change, while others, e.g., vegetation response, will likely take much longer. The plan needs to recognise that longer-term objectives for things that change slowly, like vegetation condition, do, in fact, change slowly and should therefore temper expectations for a rapid response. Natural, social, and economic environments are also not static, and management must respond to changes in these environments to maintain the direction set by objectives over time.

6.3 Adaptive management in practice

46. The draft HMP states it embodies 'adaptive management', but it reads as a reactive control plan. It is not strategic and is vulnerable to external changes (climate, natural hazard, political, legislative). There are currently no trigger points or adaptive pathways in the draft HMP, and it does not follow adaptive management principles.
47. The draft HMP inappropriately embeds precise, operational metrics into the statutory five-year document. This restricts the ability to make swift, science-based adjustments in the Annual Operational Plan (AOP).
48. Fixing targets such as sex ratios (Strategy 1.2c) prevents those managing the herd from lowering or raising the ratio in response to ecological data (e.g., a disease event or a sudden change in browse pressure), thereby undermining the stated goal of adaptive management. The GAC submits that these requirements be deleted from the HMP.
49. True adaptive management requires planning for contingencies. The draft HMP is currently silent on what happens if a strategy fails. The mandated review period is five years, which is too slow to address rapid ecological changes or political/funding shocks.

50. We recommend the HMP takes a long-term approach with thresholds that trigger different management pathways. These management pathways will be linked to an objective, but the way to achieve the objective will be flexible depending on monitoring data.

51. We propose a specific structure for how strategies are drafted to ensure the strategies embody true adaptive management.

52. A strategy cannot simply be a description of an activity. Each strategy within the HMP must contain four mandatory components to function within an adaptive feedback loop.

53. Our recommended structure is based on expert feedback from the game animal and adaptive planning sectors, and includes:

- Action: The specific management intervention or activity to be undertaken.
- Measure: The data or metric required to validate the effectiveness of the action.
- Reporting: The frequency and format in which the measure is reported to a relevant party (e.g., governance, iwi, stakeholders).
- Response: A pre-defined trigger or threshold that dictates what happens if the measure deviates from the related objective.

54. We present an example below to demonstrate how our proposed structure would work in practice:

Value	Hunting values	
Objective	Provide for high-quality hunting experiences through management of the Central North Island Sika herd.	
Strategy	Healthy animals to hunt	
	Action	Selectively harvest sika to shift herd demographics to increase the prevalence of healthy hinds and high quality stags.

	Measure	Use herd health indicator (HHI) monitoring to identify trends in sika population demographics.
	Report	HHI trends are reported on annually and considered in the next operational planning cycle.
	Respond	Adjust selective harvest and herd management measures to work towards achieving the objective.

55. By requiring this four-part structure, the HMP moves from a static document to an operational directive that forces accountability and adaptation.

6.4 The relationship between the HMP and the Adaptive Management Plan

56. We advocate for a clear separation of governance and technical implementation. The HMP should act as the governance document - setting the values, objectives, and high-level strategies. The technical specifics of how those measurements are collected and analysed should sit within the annual operational plan and a separate, living Adaptive Management Plan.

57. It is not appropriate or adaptive to include the details of monitoring methodologies in the HMP. Instead, the HMP should present a core overarching strategy that mandates the creation and maintenance of the Adaptive Management Plan.

58. To link the two documents, the HMP should include a primary strategy derived from the value of adaptive, sustainable herd management. This strategy serves as the regulatory hook that makes the AMP binding.

59. We provide draft wording of a strategy below to demonstrate how it could fit within the HMP.

Value	Adaptive, sustainable herd management
Objective	Apply an adaptive management framework based on monitoring and research to implement this plan.
Strategy	Develop and maintain an Adaptive Management Plan for the Sika HOSI.

	Action	The development of a technical AMP detailing monitoring sites, specific biometric methodologies, and data analysis protocols.
	Measure	Expert assessment (using recent research, monitoring data and hunter reporting, etc.) of triggered pathways to determine whether thresholds and signals are appropriately set.
	Report	Report on whether the adaptive management plan is contributing to achieving the objectives.
	Respond	Amend adaptive management plan based on the results from reporting and engagement with governance, iwi and stakeholders.

60. The Adaptive Management Plan should be informed by science and the best available information. It should identify early warning signals and specific trigger points where the current strategy can no longer meet the objectives.

61. The Adaptive Management Plan should outline alternative actions (pathways) that are triggered once these tipping points are reached. This ensures that the management response to deep uncertainty is proactive and pre-agreed, rather than reactive and delayed.

62. The following table presents a framework for an Adaptive Management Plan, with an example for providing high-quality hunting experiences through management of the Sika herd.

Value	Objective	Applications	Trigger points	Pathways
Hunting values	Provide for high-quality hunting experiences through	HHI monitoring is undertaken annually.	Mean body condition scores below [a pre-determined number].	Population management intervention

	management of the Central North Island Sika herd.		Decreasing mean jaw length and reproductive status	Population management intervention
		Opportunities for enhancing hunter experiences are explored collaboratively with hunters.	Identification of opportunities for enhancing hunter experiences	Design and implementation of new opportunities.

7 Summary of changes required and conclusion

63. Our critical required changes are:

Category	Changes required
Effective herd management	Amend the HMP so that it is consistent with effective herd management as set out in the GAC Act rather than being a Control Plan.
	Draft future HMP using the values based template prepared by the GAC, and ensure they align with the Principles of Quality Game Animal Management, set out in Appendix C.
	Amend the HMP to explicitly provide for the ‘sustainable management for hunting purposes while ensuring conservation values continue to be protected’ (GAC Act language).
	Remove all animal control language from the HMP. Substitute all instances of ‘control target’ with ‘herd management target’ or ‘sustainable harvest target’ to align the Plan with the HOSI's primary purpose.
Overriding considerations	A full Overriding Considerations Policy Analysis should be made available before the HMP is finalized to provide necessary legal grounding and transparency.

7.1 Conclusion

64. We, the GAC, urge DOC to substantially revise the Draft Sika Herd Management Plan to ensure it aligns with the intent and requirements of the GAC Act.

65. The current draft’s focus on control and eradication is inconsistent with the principles of sustainable herd management and the dual objectives of supporting both hunting and conservation values.

66. By adopting a values-based, adaptive management approach and incorporating the recommended changes outlined in this submission, the final HMP can serve as a robust, legally compliant, and practical framework.

67. This will empower the GAC to fulfil its statutory functions, enhance stakeholder trust and engagement, and provide enduring benefits for both the Sika herd and the wider community.

68. We look forward to working collaboratively to achieve a balanced and effective management plan.

If you have any queries relating to this feedback, please contact me on s9(2)(a) or at s9(2)(a).

Yours sincerely,

A handwritten signature in black ink, appearing to be 'Corina Jordan', written in a cursive style.

Corina Jordan

Chief Executive Officer

New Zealand Game Animal Council

Appendix A Detailed changes requested

HMP section	Key issues	Solution sought	Example drafting
General changes			
Whole HMP	The current draft HMP relies too heavily on a WAC Act ‘control-centric’ template. This structure fails to adequately reflect the unique characteristics and values of the Sika herd or the statutory purpose of a HOSI. It treats Sika as an environmental liability rather than a valued game animal.	<p>Adopt the integrated, value-based structure we provided to DOC. Our values-based structure links clear objectives, issues, and measurable strategies for four value pillars (hunting, conservation, community and cultural/heritage) to ensure management is balanced, not control-dominated.</p> <p>The values should guide the entire herd management framework. Hunting and conservation values must be balanced in the HMP to reflect the purpose of a HOSI and the overriding considerations.</p>	This change would require substantial re-work of the HMP. We are available to support this work.
Whole HMP	The draft HMP adopts WAC Act language that does not reflect the values or purpose of the HOSI and HMP.	Replace all instances of ‘control’ with ‘herd	See marked up attachment in Appendix B.

HMP section	Key issues	Solution sought	Example drafting
		management' or 'sustainable management'	
Whole HMP	<p>The draft HMP blurs the distinction between the statutory HMP and any non-statutory operational plan that is developed.</p> <p>The HMP is a statutory document made by the Minister. Amending it is a resource-intensive process requiring consultation and Ministerial approval. Including operational variables within a statutory instrument creates unnecessary rigidity and administrative burden. Currently, the HMP is reactive, not adaptive.</p>	<p>To ensure effective adaptive management, the HMP must function as a high-level strategic document.</p> <p>Ensure the HMP focuses strictly on high-level objectives, long-term strategies, and the measurement frameworks required to assess success. It should define what needs to be achieved and why.</p> <p>Explicitly state within the HMP that operational mechanics are to be detailed in a supplementary Operational Plan.</p>	<p>This change would require substantial re-work of the HMP. Our recommended changes in Appendix B support that outcome, but additional changes would be required. We are available to support this work.</p>
Cover page	<p>The front cover should have a photo of a sika deer, rather than a photo of vegetation.</p>	<p>Change the cover photo to a sika deer to reflect the purpose of the HMP.</p>	<p>We can supply a photo.</p>

HMP section	Key issues	Solution sought	Example drafting
Foreword			
Foreword	The purpose of the plan is not to recognise the unique values of the <i>area</i> but to recognise the unique values of the <i>sika herd</i> . This purpose statement reflects a conservation plan, which frames hunters as a tool for deer population control.	Amend the purpose statement to accurately reflect the purpose of the HMP under the GAC Act.	<p>The Plan seeks to recognise the unique values of these areas and the special place sika have come to have within them <u>the Central North Island sika herd as a Herd of Special Interest reflecting its special values. The sika herd within the designated HOSI area are unique in the Southern Hemisphere. Their value lies in their historic lineage, unique biology, economic and tourism value and the contribution they make to community wellbeing.</u></p> <p>In doing so, the Plan attempts to balance the critically important task of <u>will sustainably manage</u> managing these wild spaces so that natural and historic resources are protected <u>the herd and their impact on their habitat. Through this management, the recreational hunting experience will be enhanced, alongside facilitating public recreation and enjoyment and ecological benefits of these resources within the HOSI area.</u> subject to that protection, while considering the day-to-day realities of conservation and wild animal management.</p>

HMP section	Key issues	Solution sought	Example drafting
Foreword	There is ambiguity about what effort has culminated to result in this HMP.	Explain what work has been put in to date with regards to management of the sika herd.	This Plan represents the culmination of years of effort to improve <u>sika management</u> by a number of individuals and organisations, including the Central North Island Sika Foundation and the New Zealand Game Animal Council.
Introduction			
Section 1, Introduction	We support the initial wording in the introduction.	No change needed.	
Section 1, Purpose of this Plan	The purpose statement is vague and does not address the recognition of the special values of the Central North Island sika herd.	Amend to incorporate the values of the sika herd.	This Plan <u>recognises the value of the Central North Island sika herd as a HOSI. These values include their historic lineage, unique biology, economic and tourism value and the benefits the deer provide to community wellbeing. directs management of the Sika Herd of Special Interest on behalf of the Minister for Hunting and Fishing.</u> † The Plan establishes objectives and strategies for the management of sika in the Sika Herd of Special Interest Area (the Sika Area) to achieve the benefits expected to be gained by managing this herd of deer for hunting purposes.
Section 1, Purpose of this Plan	The Plan states that it allows for ‘responsive and adaptive management’ but when viewed in its entirety, the Plan is reactive not adaptive.	The entire HMP needs to be reviewed to ensure adaptive management principles are embedded throughout.	This change would require substantial re-work of the HMP. Our recommended changes in Appendix B support this outcome, but additional

HMP section	Key issues	Solution sought	Example drafting
			changes would be required. We are available to support this work.
Section 1, Application of the Plan and statutory context	The statutory context does not address the change in status of sika when they are designated as a HOSI. Upon designation, sika will no longer be a wild animal under the WAC Act and will become a highly valued game species under the GAC Act.	Add an explanation of the change is sika status to the statutory context section.	<u>Upon designation as a HOSI, the Central North Island sika deer in the Sika Area will no longer be classified as a wild animal under the WAC Act and will become a highly valued game species under the GAC Act.</u>
Overriding considerations	The draft HMP asserts consistency with the overriding considerations but there is no explanation or analysis on how the HMP meets the consistency test. This presents a risk to the adoption and implementation of the HMP, as the HMP must be implemented in a way consistent with the overriding consideration. It also presents a risk to the Minister exercising his power to delegate HOSI functions to the GAC.	A full Overriding Considerations Policy Analysis should be made available at the same time as the HMP to provide necessary legal grounding and transparency.	This change would require substantial work . We are available to support this work.
Values			
Section 2	The draft HMP combines the discussion on values with the discussion on context, making it difficult to ascertain what values underpin the HMP and flow through the objectives and strategies.	Separate the values and context section into two sections.	Example structure: 2. Values 2.1 The value of the Sika Herd 2.2 Conservation values

HMP section	Key issues	Solution sought	Example drafting
			2.3 Cultural values 2.4 Heritage values 2.5 Community values 3. Context 3.1 The Sika herd 3.2 The hunting community 3.3 Geographical context 3.4 Ecological context 3.5 Historical context 4. Managing sika for hunting purposes
Section 2	The value of the herd as a hunting resource is not adequately captured in the HMP.	Move the discussion on hunting values to the top of the values section and expand on why the sika herd is a valued game animal.	See marked up HMP in Appendix B .
Section 2, Conservation	We oppose this section.	This section should be included in the new context section and rewritten to describe how sika	See marked up HMP in Appendix B .

HMP section	Key issues	Solution sought	Example drafting
and introduced species	This section of the HMP is written from a pest-control perspective and does not reflect the values of the herd.	became established in the designated area.	
Section 2, Hunting and recreation values	<p>The position and content of this section does not reflect the purpose of the HMP. The preceding sections frame the herd primarily as a pest to be suppressed, rather than a resource to be managed. That sets the tone for the remainder of the document.</p> <p>The HMP should clearly outline why the Central North Island Sika herd is a valued game animal and focus on hunting values in relation to the value of the herd.</p> <p>The monitoring portion of this section does not belong in a description of values.</p>	<p>This section should focus on the value of the sika herd as a hunting resource and should be moved to the front of the values section.</p> <p>A new section should be created to focus on what managing the herd for hunting purposes means. The monitoring, research and reporting part of the draft HMP could be included here.</p>	See marked up HMP in Appendix B .
Section 2, Culture, heritage and stewardship values	This section does not recognise tangata whenua as partners under Te Tiriti or their unique aspirations for the HOSI area. There is no provision for the values of tino rangatiratanga or mātauranga.	<p>Mana whenua should be invited to write their own section in the HMP that genuinely reflects the values they hold for the HOSI.</p> <p>Heritage values can become a separate section.</p>	Mana whenua should be invited to write their own section in the HMP. See marked up HMP in Appendix B for structural changes.
Objectives			

HMP section	Key issues	Solution sought	Example drafting
Section 3, Objective 1	<p>We oppose the wording of this objective.</p> <p>Draft Objective 1 links sika management to the maintenance of entire ecosystems. Ecosystems are affected by multiple factors in addition to sika, for example disease, climate and weeds. It is not appropriate to seek overall ecosystem management as a result of management of one part of that ecosystem. The requirement to ‘protect’ threatened species and their habitats is too onerous and sets an unattainable goal for the HMP given that deer do not affect all threatened species and habitats.</p>	<p>The management of the sika herd should be linked only to its impacts and set realistic ecological outcomes for matters affected by sika and their management, not overall ecosystem management.</p>	<p>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.</p> <p><u>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.</u></p>
Section 3, Objective 2	<p>We oppose the wording of this objective.</p> <p>The draft objective dilutes the hunting experience focus of the HMP and unnecessarily doubles up on conservation objectives. There is no need to repeat the matters covered in Objective 1, all objectives stand alone and are read together. By making Objective 2 conditional on conservation outcomes implies the hunting experience dependent on, the service the hunter provides to the ecosystem.</p>	<p>Amend the objective to reflect the primary purpose of the HMP and specifically address the Sika quality and the high-quality hunter experience in the Sika HOSI area.</p>	<p>The sika hunting experience is enhanced while contributing to overall management and regeneration of the Sika Area.</p> <p><u>Provide for high-quality hunting experiences through management of the Sika herd.</u></p>
Section 3, Objective 3	<p>We support this objective with amendments.</p>	<p>Amend the objective to focus on the continuous, sustainable funding necessary to deliver the</p>	<p>Seek to generate in-kind support, and revenue through partnerships and sponsorships, to contribute to the cost of delivering this Plan.</p>

HMP section	Key issues	Solution sought	Example drafting
	The draft objective uses passive language, which obscures accountability and weakens the call to action.	HMP. Ensure that one-off funds are included.	<u>Build or maintain sources of income, partnerships, and in-kind support that support and advance the other objectives of this HMP.</u>
Section 3, Objective 4	<p>We support the intent of this objective, but seek changes to the wording.</p> <p>The draft objective doesn't emphasise the right outcome. The purpose of building hunter and community involvement in herd management is to enhance the experience within the Sika HOSI area and to achieve ecological outcomes.</p>	Delete Objective 4 and replace with an objective that ensures hunter-led engagement in both conservation (e.g., trapping) and social (e.g., access/ community support) projects. The new objective should integrate wording from key conservation legislation and policy to ensure the HMP progresses in line with the overriding considerations.	<p>Engage the hunting community in the management of sika and the Sika Area so the community provide support for local conservation and social initiatives.</p> <p><u>Build or maintain hunter and community involvement in:</u></p> <p>a) <u>Initiatives that enhance the recreation, use and enjoyment of the public in the Sika Area, and</u></p> <p>b) <u>Conservation initiatives that promote the health and wellbeing of indigenous plants and animals.</u></p>
Section 3, Objective 5	<p>Draft Objective 5 seeks that 'opportunities for tangata whenua to be involved and participate... are increased'. The terms 'participation' and 'involvement' do not fully capture the statutory and customary rights of iwi, the existing relationship the CNISF has with iwi, or the GAC's aspirations as partners under Te Tiriti.</p> <p>DOC has not facilitated meaningful engagement between the GAC, CNISF and iwi and hapū, so our</p>	Introduce specific, empowering terminology to identify opportunities for tangata whenua to 'exercise tino rangatiratanga and kaitiakitanga'. This will shift the focus from participation to partnership and aligns with	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.

HMP section	Key issues	Solution sought	Example drafting
	<p>recommended objective is not based on HMP-specific advice from tangata whenua.</p> <p>We understand the CNISF has a good relationship with tangata whenua within the HOSI area, however we are not privy to how iwi and hapū have been engaged in the HMP process. The GAC and CNISF place high priority on building meaningful relationships with tangata whenua that are based on mutual respect. The draft objective does not reflect this commitment – using passive language when referring to relationships with tangata whenua.</p>	<p>wording in overriding considerations.</p> <p>Language in this objective should reflect the aspirations of iwi and hapū. Where those aspirations are unknown, active and empowering language should be used to ensure herd managers are held to account as partners under Te Tiriti.</p> <p>The GAC are committed to being good Treaty partners and authentically engaging with tangata whenua on herd management is a priority for us.</p>	<p><u>Collaboration between hunting management organisations (the Department, the Game Animal Council, and the Sika Foundation), and partnership between those organisations and tangata whenua (Ngāti Tūwharetoa, Ngāti Whitikaupeka, Ngāti Tamakōpiri, Mana Ahuriri Trust, Hineuru Iwi Trust, Tamatea Pōkai Whenua), is maintained and strengthened. Opportunities for tangata whenua to exercise tino rangatiratanga and kaitiakitanga in the Sika Area are identified and implemented where appropriate.</u></p>
Section 3, Objective 6	<p>Improving knowledge is a tool used to achieve an objective. It does not constitute an objective itself.</p> <p>In a management context, research is valuable if it feeds into the adaptive management loop. The objective should be to reduce uncertainty to allow for better decisions, not just to improve understanding.</p>	<p>Remove Objective 6 and merge the research component with the monitoring and adaptive management objectives.</p>	<p>Knowledge and understanding of the dynamics between sika and indigenous species and ecosystems are improved.</p>

HMP section	Key issues	Solution sought	Example drafting
Section 3, Objective 7	Draft Objective 7 is procedural, not outcome focussed. It states what monitoring will do but does not tie that to a measurable outcome. There is a lack of accountability, and the use of passive language weakens the link between monitoring data and adaptive management actions.	Remove Objective 7 and merge the adaptive management component with the research objectives.	Monitoring enables adaptive management and demonstrates whether the management of sika is achieving the objectives of this Plan.
Section 3, Objective 8	Draft Objective 8 describes a relationship not an outcome. It is not measurable and does not tie research to the adaptive management framework. Passive language obscures accountability and the call to action.	Remove Objective 8 and merge the research component with the monitoring and adaptive management objectives.	Research supports and enhances the management of sika and the Sika Area.
Section 3, Objective 9	This is a very administrative and circular objective. It does not contain a strategic element and is not outcome focused.	Remove Objective 9.	Public reporting provides information on whether the Plan is achieving the Objectives.
Section 3	Draft Objectives 6 – 8 are procedural, not strategic. They isolate monitoring, research and reporting, which are fundamental components of an adaptive management system. This has the potential to weaken adaptive management in the HOSI, which requires a holistic approach.	Insert a new objective that embeds adaptive management principles for all HMP objectives governing the entire HMP cycle.	<u>Apply an adaptive management framework based on monitoring and research to implement this plan.</u>
Section 3	The current ordering of the objectives dilutes the importance of hunting values and upholds conservation values as the most important.	Re-order the objectives to effectively balance values in the context of the HMP.	<ol style="list-style-type: none"> 1. Provide for high-quality hunting experiences through management of the Sika herd. 2. Maintain or enhance the current health of forest vegetation, including canopy regeneration and threatened species that can

HMP section	Key issues	Solution sought	Example drafting
			<p>be adversely affected by sika browse, through management of the sika herd.</p> <ol style="list-style-type: none"> 3. Collaboration between hunting management organisations (the Department, the Game Animal Council, and the Sika Foundation), and partnership between those organisations and tangata whenua (Ngāti Tūwharetoa, Ngāti Whitikaupeka, Ngāti Tamakōpiri, Mana Ahuriri Trust, Hineuru Iwi Trust, Tamatea Pōkai Whenua), is maintained and strengthened. Opportunities for tangata whenua to exercise tino rangatiratanga and kaitiakitanga in the Sika Area are identified and implemented where appropriate. 4. Build or maintain hunter and community involvement in: <ol style="list-style-type: none"> a) Initiatives that enhance the recreation, use and enjoyment of the public in the Sika Area, and b) Conservation initiatives that promote the health and wellbeing of indigenous plants and animals. 5. Build or maintain sources of income, partnerships, and in-kind support that support and advance the other objectives of this HMP.

HMP section	Key issues	Solution sought	Example drafting
			6. Apply an adaptive management framework based on monitoring and research to implement this plan.
Strategies			
Section 3, Strategy 1.1	<p>We oppose this strategy.</p> <p>Draft Strategy 1.1 enforces a short-term pest control model (body counts) rather than a long-term game management model. This conflicts with the herd being a valued resource in need of sustainable management.</p>	<p>The strategies should be focused on the health of the herd and their habitat through sustainable management.</p> <p>Remove Strategy 1.1</p>	<p>Set and review annual sika management targets to manage populations in a way that aligns with the objectives and strategies of this Plan.</p>
Section 3, Strategy 1.2	<p>Protecting and enhancing the hunting experience under this HMP should not be limited to the Sika rut. This HMP manages the herd to enhance the hunting experience for all recreational hunters – not just those hunting during the rut.</p>	<p>We support this strategy with amendments to remove the time constraint and to refer to ‘herd management’ instead of ‘control’.</p>	<p>Coordinate and manage recreational hunting, herd management hunts, and professional control operations <u>herd management activities and harvest activity</u> to selectively remove sika in a way that:</p> <ul style="list-style-type: none"> a) prioritises areas for population control <u>herd management</u>; b) protects and enhances the hunting experience during the sika rut; and c) achieves a male-biased population, with a higher proportion of older males.
Section 3, Strategy 1.3	<p>We oppose this strategy.</p>	<p>Remove Strategy 1.3.</p>	<p>Apply other management options if recreational hunting is insufficient to maintain a sika</p>

HMP section	Key issues	Solution sought	Example drafting
	The reference to 'other management options' is vague and implies non-discriminate pest control methods could be deployed if recreational hunters are deemed insufficient.		population that achieves the ecological objectives of this Plan.
Section 3, Strategy 1.6	We support this strategy. The status quo for access to sika hunting will be maintained as far as practicable.	No change required.	
Section 3, Strategy 1.7	We support this strategy with an amendment to reflect the overriding considerations. A ballot or booking system in the REZ should be used as a management tool.	Amend strategy to reflect the overriding considerations.	Explore opportunities to establish a hunter ballot or booking system in the Kaimanawa Remote Experience Zone during the sika rut period <u>for herd management purposes.</u>
Section 3, Strategy 1.8	We support this strategy with amendments. The time constraint 'short periods' is ambiguous. It is sufficient to say access will be coordinated where necessary for herd management.	Amend strategy to remove time constraint.	Work with relevant groups and organisations to manage recreational hunting access for short periods outside the sika rut where necessary to support population <u>herd</u> management activities.
Section 3, new strategy	There is a gap where the hunting community should be consulted when developing authorisation, education and promotional materials to make sure their values and interests are reflected and that all material is fit for purpose.	Add a strategy to ensure hunter values are reflected in educational and promotional material.	<u>Work with the hunting community when developing hunter authorisation, education and promotional materials to ensure that these appropriately recognise and provide for their values and interests.</u>

HMP section	Key issues	Solution sought	Example drafting
Section 3, Strategy 1.11	<p>We support this strategy with amendments.</p> <p>The HOSI mechanism changes the status of deer from ‘pests’ to valued game animals. The use of control-centred language reflects the status under the WAC Act, not the sustainable herd management language of the GAC Act.</p>	Amend strategy to refer to ‘herd management’ instead of ‘animal control’.	<p>Focus herd management hunts on opportunities to:</p> <ul style="list-style-type: none"> a) facilitate access to parts of the Sika Area where access is difficult, recreational hunter activity is limited or sika abundance is particularly high; b) increase awareness in the hunting community of the impacts of sika on these parts of the Sika Area; and c) contribute to animal control <u>herd management</u> activities.
Section 3, Strategy 1.12	<p>We support this strategy with amendments.</p> <p>Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.</p>	Amend the strategy to use active language.	Seek opportunities to Recover venison from sika removed as part of herd management hunts where efficiency and effectiveness are not compromised.
Section 3, Professional control operations	<p>We support this strategy with amendments.</p> <p>The use of control-centred language reflects the pest status under the WAC Act, not the sustainable herd management language of the GAC Act.</p>	Amend strategy heading to refer to ‘herd management’ instead of ‘control’.	Professional control <u>herd management</u> operations
Section 3, Strategy 1.13	<p>We support this strategy with amendments.</p> <p>The HOSI mechanism changes the status of deer from ‘pests’ to valued game animals. The use of control-centred language reflects the pest status</p>	Amend strategy to refer to ‘herd management’ instead of ‘control’.	Undertake professional control <u>herd management</u> operations where recreational hunting and herd management hunts are

HMP section	Key issues	Solution sought	Example drafting
	under the WAC Act, not the sustainable herd management language of the GAC Act.		insufficient to maintain a sika herd that achieves the objectives of this Plan.
Section 3, Strategy 1.14	<p>We support this strategy with amendments.</p> <p>Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.</p> <p>The HOSI mechanism changes the status of deer from ‘pests’ to valued game animals. The use of control-centred language reflects the pest status under the WAC Act, not the sustainable herd management language of the GAC Act.</p>	<p>Amend strategy to refer to ‘herd management’ instead of ‘control’.</p> <p>Amend the strategy to use active language.</p>	<p>Seek opportunities to Recover venison from sika removed as part of professional control <u>herd management</u> operations where efficiency and effectiveness are not compromised.</p>
Section 3, Strategy 2.1	<p>Support with amendments.</p> <ul style="list-style-type: none"> There is no stated purpose for the monitoring programme. The monitoring programme needs to be closely linked to the purpose of the HMP, its objectives and relate to the effectiveness of its strategies. A monitoring programme that is too broad, or not strongly linked to management strategies will not yield helpful information. The monitoring programme needs to be at an appropriate geographic scale, that will meaningfully relate to the impacts of deer and how they move in the landscape. Too broad a 	<p>Amend strategy to remove:</p> <ul style="list-style-type: none"> Faecal pellet counts as an ecological monitoring tool. Reference to the Conservation Boards. The requirement to monitor hunter contribution to control targets. The requirement to monitor hunter satisfaction with the HOSI management. 	<p>Develop and implement a monitoring programme that, <u>at appropriate geo-temporal scales, measures Sika impacts, herd health and quality, and the benefits achieved through other management activities.</u> This <u>should</u> include the following:</p> <p>a) Ecological monitoring, which may include, but is not limited to, the following methods and tools:</p> <ol style="list-style-type: none"> Seedling ratio index Permanent 20 x 20 metre plots Alpine deer browse Faecal pellet counts

HMP section	Key issues	Solution sought	Example drafting
	<p>scale will not yield valuable information, and too fine a scale will waste effort.</p> <ul style="list-style-type: none"> • Faecal pellet counts are a poor metric for sustainable herd management because they fail to measure the interaction between deer and their habitat. Management should be precise, responsive and focused on ecological outcomes. Faecal pellet counts measure where deer have been not the impact they are having and are not the best tool to measure trends in herd activity. • The monitoring of hunter harvest should include metrics of the quality of the harvest, as well as the age and size, as this is a key measure of hunter benefit and the effectiveness of herd management. • Conservation Boards do not have a role in sustainable game animal management, and involvement in sustainable game animal management is outside their statutory functions. DOC will provide sufficient representation of conservation values when discussing new monitoring methods, tools and technologies. • New monitoring methods must be assessed for comparability with previous monitoring methods. If they are not the ability to understand 	<p>Amend strategy to <u>add</u>:</p> <ul style="list-style-type: none"> • A purpose for the monitoring programme that reflects the impact of deer and the benefits of herd management activities, not generic ecosystem health measurements. • A reference to appropriate geographic scale • Monitoring of the size and condition of sika and the size and quality of their antlers • Ensuring that any new monitoring methods allow data to be compared and analysed between different methods so long term trends can be assessed. • Reference to the GAC in strategy 2.1(b) 	<p>b) Exploring the use of new monitoring methods, tools and technologies, and seeking the views of tangata whenua, the Game Animal Council <u>Tongariro Taupō Conservation Board</u>, the East Coast Hawke’s Bay Conservation Board and the Department prior to their use in the Sika Area.</p> <p><u>x) Changes to monitoring methods, if made, must consider integration or comparability with previous monitoring tools to enable long-term trend analysis and reporting</u></p> <p>c) Monitoring the hunter harvest; including the hunter contribution to control targets and the age and length of jaws from animals harvested to determine the herd age structure, <u>size and condition of animals and antlers</u>, genetic integrity and growth rates.</p> <p>d) Monitoring voluntary and partnership contributions to the key management objectives.</p> <p>e) Monitoring hunter satisfaction with the management of the Sika Herd of Special Interest, including, but not limited to, the:</p> <ol style="list-style-type: none"> i. quality of sika available; ii. hunting experience;

HMP section	Key issues	Solution sought	Example drafting
	<p>long term changes are lost when monitoring methods change.</p> <ul style="list-style-type: none"> • The GAC is the expert body on sustainable game animal management and should be included in any discussion on new monitoring methods, tools and technologies. • Referring to the ‘hunter contribution to control targets’ reduces recreational hunters to a pest control tool. This is inappropriate when directing monitoring for a valued game species. • Hunter satisfaction monitoring should be based on the outcomes of sustainable herd management. It is not necessary to monitor hunter satisfaction with the mechanics of herd management. <p>Monitoring should directly relate to the values and objectives within the HMP.</p>		<ul style="list-style-type: none"> iii. hunter harvest (age, gender, health of the sika harvested, and general location) and iv. authorisations processes, including the information available to hunters prior to and after their hunting trips.
Section 3, Strategy 2.2	<p>Support with amendments.</p> <p>Ecological monitoring methods should follow best practice within the sustainable herd management context. There is a risk that standards set by DOC may reflect a pest-control philosophy as that is the Department’s mandate. Best practice methods and</p>	<p>Amend strategy to reference best practice methods and standards, rather than just standards set by DOC.</p>	<p>Undertake ecological monitoring <u>using best practice methods and standards</u>, in accordance with relevant standards used or set by the Department.</p>

HMP section	Key issues	Solution sought	Example drafting
	standards may be available that are more relevant to sustainable herd management, that are not adopted by DOC, and these should be available to implement the HMP.		
Section 3, Strategy 2.4	<p>We support this strategy with amendments.</p> <p>Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.</p> <p>This research strategy is too general and doesn't direct research on long-term resilience factors.</p>	<p>Amend the strategy to use active language and incorporate research on the resilience of the herd.</p>	<p>Seek opportunities to Undertake or support research relevant to the management of sika and/or their effects within the Sika Area, <u>including research on the resilience of the herd and the impact of herd management mechanisms.</u></p>
Section 3, Strategy 2.6	<p>We support this strategy with amendments.</p> <p>One of the main purposes of the HMP is to manage the herd for its hunting value. Therefore, research to better understand the management of the HOSI should also investigate the hunter experience.</p>	<p>Amend strategy to include research on the hunter experience within the HOSI area.</p> <p>Remove 'spread and behaviours' in (a) because these will be covered by 'effects' of sika on their ecosystem.</p>	<p>Undertake relevant research, <u>including research</u> related which may related to, <u>but is not limited to,</u> the:</p> <ul style="list-style-type: none"> a) spread, behaviours and effects of sika on indigenous flora, and how this compares with that of other deer species; b) movement patterns and habitat utilisation of sika within the Sika Area; and c) changes in the health and composition of the sika herd over time. d) <u>hunter harvest and satisfaction.</u>
Section 3, Strategy 3.1	We support this strategy with amendments.	Amend the strategy to use active language and to give	Seek to e Establish a forum or rōpū (group) with relevant iwi and hapū to enable the sharing of

HMP section	Key issues	Solution sought	Example drafting
	This strategy also makes an assumption about how iwi and hapū want to be involved in herd management. Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.	tangata whenua autonomy over how they are involved.	perspectives and enhance opportunities for iwi and hapū to be involved in management of the Sika Herd of Special Interest, <u>to the extent they would like to be.</u>
Section 3, Strategy 3.2	We support this strategy with amendments. Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome. This strategy also makes an assumption on how iwi and hapū want to be involved in herd management.	Amend the strategy to use active language and to give tangata whenua autonomy over how they are involved.	Seek to e Create opportunities for iwi and hapū to be actively involved in delivering herd management activities, <u>to the extent they would like to be.</u>
Section 3, Strategy 4.1	We support this strategy with amendments. Partnerships to meet the costs of implementing the HMP should not be limited to opportunities associated with sika, as this could unnecessarily limit opportunities. Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.	Delete reference to ‘associated with sika’ in relation to commercial opportunities. Amend the strategy to use active language.	Seek to d Develop partnerships and commercial opportunities associated with sika to help meet the costs of implementing this Plan.
Section 3, Strategy 4.3	The HMP needs to better acknowledge the important role that neighbours play and the need to work collaboratively with them to achieve the objectives of the HMP. Sika move between conservation land,	Include a new strategy under the heading ‘Partnerships’ to appropriately recognise the need for collaborative	<u>4.3 Develop and maintain collaborative relationships with the owners and managers of land neighbouring the Sika Herd of Special Interest, to so that herd management considers</u>

HMP section	Key issues	Solution sought	Example drafting
Insert new strategy	defence land, farming and forestry land. Partnerships with neighbouring land owners and managers will assist in managing the herd and address any cross boundary issues. These relationships are key, and the current 'Stewardship' Strategy 4.8 does not appropriately recognise this key role and the need for collaboration.	relationships with neighbouring landowners and managers.	<u>the needs of neighbours and facilitates effective herd management across property boundaries.</u>
Section 3, Strategy 4.4	We support this strategy with amendments. The HOSI mechanism changes the status of deer from 'pests' to valued game animals. The use of control-centred language reflects the pest status under the WAC Act, not the sustainable herd management language of the GAC Act.	Amend strategy to remove reference to 'control' activities.	Provide a range of opportunities for the hunting community and other interested parties to actively contribute to sika herd management and control activities.
Section 3, Strategy 4.7	We support this strategy with amendments. Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.	Amend the strategy to use active language.	Seek to p Provide a range of opportunities for the hunting community and other interested parties to contribute to wider conservation initiatives within the Sika Area, such as predator trapping and control programmes and the maintenance of public recreation infrastructure.
Section 3, Strategy 4.8	We support this strategy with amendments. Passive language obscures accountability and weakens the mandate to implement the strategy for its intended outcome.	Amend the strategy to use active language.	Seek opportunities to w Work with the owners and managers of private land adjoining Kaweka Forest Park, Kaimanawa Forest Park and Kaweka Forest Conservation Area to improve the management of sika beyond the Sika Area.

HMP section	Key issues	Solution sought	Example drafting
<p>Section 3, Strategy 5.1</p>	<p>We support this strategy with amendments.</p> <p>The HOSI mechanism changes the status of deer from ‘pests’ to valued game animals. The use of control-centred language and reduction ‘targets’ reflects the pest status under the WAC Act, not the sustainable herd management language of the GAC Act.</p> <p>Specific operation details should be determined during the Annual Operational Plan process, as they restrict the strategic and adaptive functions of the HMP.</p>	<p>Amendment strategy to:</p> <ul style="list-style-type: none"> • Refer to ‘management’ instead of ‘control’. • Clarify targets refer to management not control. • Defer the setting of operational details to the Annual Operational Plan process. 	<p>Develop an annual operational plan for the activities planned for the coming year to help achieve the objectives. This operational plan should include, but is not limited to:</p> <ol style="list-style-type: none"> a) setting operational areas and annual operational herd management targets and focus areas, including desirable herd composition and specific locations within the Sika Area. <u>control targets, including the sex ratio of sika and specific locations within the Sika Area for control;</u> b) outlining herd management activities methods to achieve annual herd management targets, such as recreational hunting, herd management hunts and professional control operations; c) providing opportunities for the carcass recovery of venison associated with control herd management operations; d) setting the annual sika hunting process, including the issuing of authorisations and any key dates; e) identifying any other planned work or initiatives; and f) identifying parties or entities responsible for management activities and related timeframes.

HMP section	Key issues	Solution sought	Example drafting
Section 3, Strategy 5.2	<p>We support this strategy with amendments.</p> <p>The HOSI mechanism changes the status of deer from 'pests' to valued game animals. The use of control-centred language reflects the pest status under the WAC Act, not the sustainable herd management language of the GAC Act.</p>	Amend strategy to refer to 'management' instead of 'control'.	<p>Prepare and publish an annual report detailing the activities undertaken in the previous year, including, but not limited to:</p> <ul style="list-style-type: none"> a) overall herd management <u>activities</u>, including the number of sika controlled <u>harvested</u>, the control <u>herd management</u> method(s) used, the areas where control <u>herd management</u> occurred and the control <u>herd management</u> effort; b) results and outcomes of monitoring activities, such as ecological monitoring and hunter participation and satisfaction evaluations; c) key metrics of the contribution of hunters to herd management, such as the number of authorisations issued and available information on the ages, locations, condition and quality of the sika taken; d) sponsorships and commercial partnerships; e) hunter training, education and community initiatives; f) wider conservation activities supported; and g) opportunities to improve management going forward.
Section 3, Strategy 5.3	We oppose this strategy.	Delete financial reporting requirements.	Include financial reporting in the annual report in relation to:

HMP section	Key issues	Solution sought	Example drafting
	<p>The financial reporting required by the strategy is not appropriate in a statutory HMP document. Financial reporting will be undertaken as part of either the GAC's or DOC's annual reporting and audit requirements as statutory organisations.</p> <p>While the GAC supports transparency regarding the viability of the HOSI system, the HMP must not mandate the disclosure of detailed private expenditures or revenue streams of partner entities (such as the Sika Foundation or other NGOs).</p>		<p>a) —sika control and other conservation activities;</p> <p>b) —overall expenditure and contributions by the Department and/or central government to manage the Sika Herd of Special Interest; and</p> <p>c) —monitoring.</p>
Section 3, Strategy 5.4	<p>We oppose this strategy.</p> <p>Either the Game Animal Council or the Department of Conservation will be the statutory management entity for HOSI implementation, therefore the provision is unnecessary and creates undue bureaucracy.</p>	Remove Strategy 5.4.	Work with the Department when preparing the annual report prior to its finalisation and public release.
Section 3, Strategy 5.5	<p>We support Strategy 5.5 with an amendment.</p> <p>The Conservation Boards operate under a different statutory mandate (Conservation Act 1987) that often conflicts with the objectives of the GAC Act 2013. Oversight of HOSI or the GAC is not within the functions of Conservation Boards.</p>	Amend the strategy to remove reference to the Conservation Boards.	Present the annual report to Te Kotahitanga o Ngāti Tūwharetoa, Ngāti Whitikaupeka, Ngāti Tamakōpiri, Mana Ahuriri Trust, Hineuru Iwi Trust, Tamatea Pōkai Whenua, Tongariro-Taupō Conservation Board and the East Coast Hawke's Bay Conservation Board , if requested.

HMP section	Key issues	Solution sought	Example drafting
	<p>The Annual Report will be publicly available (Strategy 5.2) and accessible to the Conservation Boards.</p> <p>Requiring the 'presentation' of the annual report to Conservation Boards implies they have a level of oversight over the HMP.</p>		
Compliance, review and enforcement			
Section 4, Plan compliance and review	<p>The method of locking in a HMP for five years, then doing a whole of plan review does not align with adaptive management principles.</p>	<p>Add a paragraph that makes it clearer that where monitoring and reporting indicate changes to the HMP are required to support effective management of the herd before a 5 yearly review, that may be initiated.</p>	<p><u>Where monitoring and reporting indicate that changes to this plan are required to support the effective adaptive management of the herd, a targeted review may be initiated earlier.</u></p>

HMP section	Key issues	Solution sought	Example drafting
Section 4, Plan compliance and review	Reviews of the HMP should only have to re-assess the HMP against the overriding considerations if there has been significant change either in the HMP or in the overriding considerations.	Clarify when a full assessment of the overriding considerations is required.	<p>The review will consider annual reports, monitoring data and results, and relevant research as part of an assessment of whether the Plan’s objectives and strategies are delivering the benefits expected to be gained by managing the sika herd for hunting purposes. The review will also address the overriding considerations outlined in section 1, <u>under the following circumstances:</u></p> <ul style="list-style-type: none"> • <u>if one or more of the overriding considerations has undergone significant reform since the last assessment, or</u> • <u>if major amendments are proposed to the HMP.</u> <p><u>Minor or administrative changes to the HMP will not require a full assessment against the overriding considerations.</u></p>
Glossary			

HMP section	Key issues	Solution sought	Example drafting
Authorisation	The definition of 'authorisation' does not reference that the power to issue authorisations may be delegated to the GAC under s20 of the GAC Act.	Amend the definition to include delegations.	Collective term for types of approvals (whether permits or otherwise) issued by the Minister for Hunting and Fishing under section 18 of the Game Animal Council Act 2013, <u>or issued by the Game Animal Council where this power is delegated to them by the Minister under section 20 of the Game Animal Council Act 2013.</u>
Community	The definition of community is limited to parties with an interest in conservation issue. This excludes those people who are interested in a recreational, commercial or social issue.	Expand the definition of community beyond conservation interests.	Any individual or group (whether statutory or non-statutory, formal or informal, commercial or non-commercial) with an interest in a particular conservation <u>issue of relevance to the HOSI.</u>
Control target	The use of control-centred language reflects the pest status under the WAC Act, not the sustainable herd management language of the GAC Act. The different types of herd management can be captured in one term, which is defined. A definition is provided later in this submission.	Amend definition to refer to 'herd management activities'.	Control Herd management target A target number of deer to be removed from the Sika Area via <u>herd management activities</u> recreational hunting, commercial hunting and professional control operations on an annual basis, as set out in an annual operation plan.
Professional control operation	The use of control-centred language reflects the pest status under the WAC Act, not the sustainable herd management language of the GAC Act. This definition also refers to sika as 'wild animals' which is an incorrect classification. The HOSI mechanism changes the status of deer from 'wild animals' under the WAC Act to valued game animals.	Amend definition to refer to 'herd management' instead of 'control'. Remove reference to 'wild animals'.	Professional control <u>herd management</u> operation. Activities to search for and shoot wild game animals as a non-recreational and non-commercial activity specifically to help achieve control <u>herd management</u> targets. Professional control <u>herd management</u> operations generally

HMP section	Key issues	Solution sought	Example drafting
			<p>do not <u>may</u> involve recovery of the animals or any parts of the animals. Professional control <u>herd management</u> operations may selectively target sika based on the sex and condition of individual animals.</p>
Herd Management Activities	<p>Providing an overarching phrase for all activities under this plan whose purpose is to assist in herd management is useful and will assist in the overall drafting of the plan.</p>	<p>Include definition of herd management activities.</p>	<p><u>Herd management activities include any activity that manipulates the demographics of the herd including number and structure. It can include recreational hunting, commercial hunting, and professional herd management operations that are provided for in this plan.</u></p>

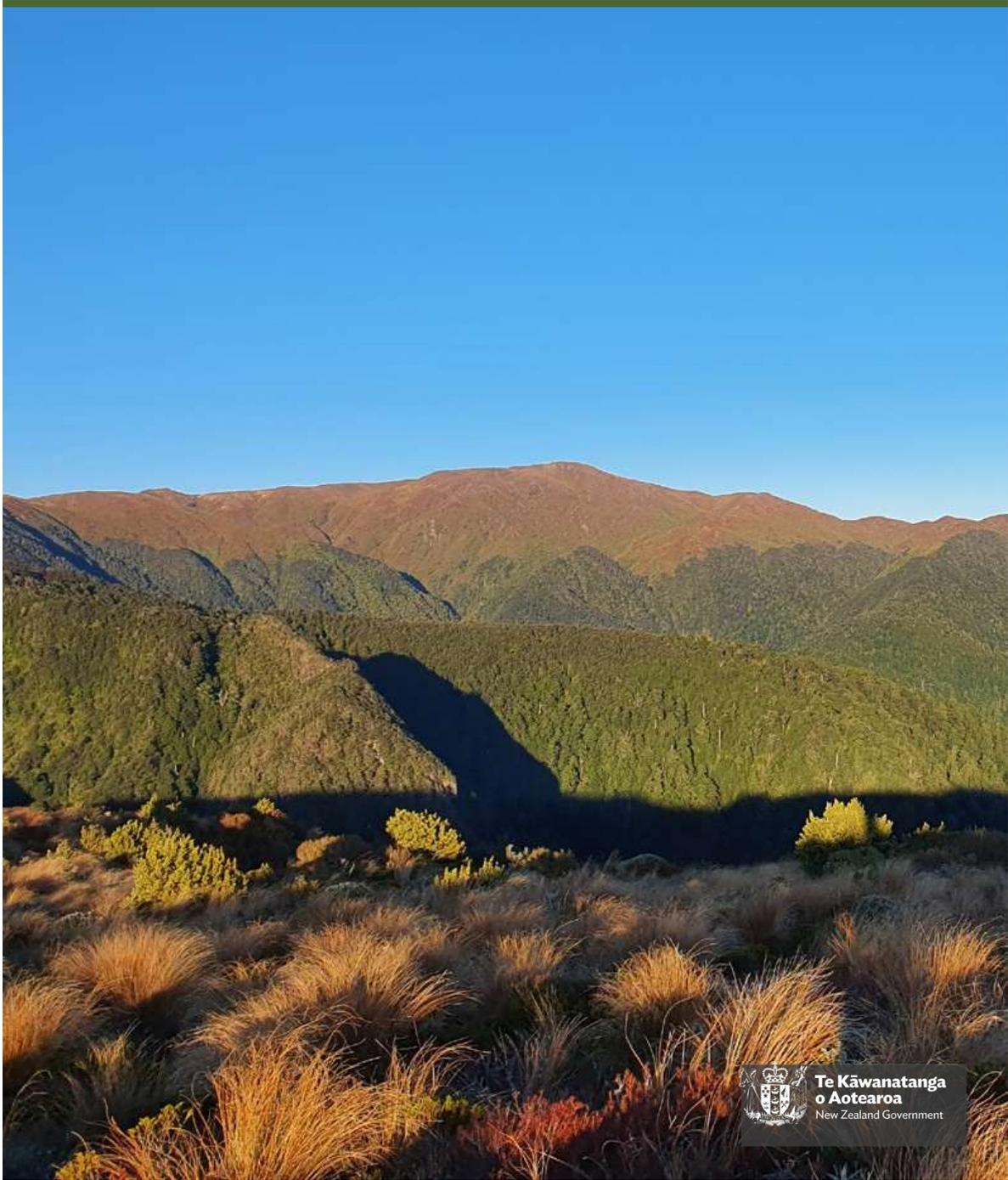
Appendix B Marked up draft HMP

November 2025

Commented [A1]: The front cover should be a photo of a sika deer.

Sika Herd of Special Interest

Draft Herd Management Plan



Cover: Kaimanawa Forest Park. *Photo: Department of Conservation*

Sika Herd of Special Interest Draft Herd Management Plan

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This document is available at www.doc.govt.nz/sika-hosi-consultation

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1 Foreword

Welcome to the *Sika Herd of Special Interest Draft Herd Management Plan*.

This is the first draft herd management plan prepared in accordance with the Game Animal Council Act 2013 to be publicly notified for submissions. It relates only to the management of sika and the designation of a herd of special interest within the Sika Area of Kaimanawa Forest Park, Kaweka Forest Park and Kaweka Forest Conservation Area.

The Plan seeks to recognise [the Central North Island sika herd as a Herd of Special Interest reflecting its special values. The sika herd within the designated HOSI area are unique in the Southern Hemisphere. Their value lies in their historic lineage, unique biology, economic and tourism value and the contribution they make to community wellbeing, the unique values of these areas and the special place sika have come to have within them.](#) In doing so, the Plan ~~attempts to balance the critically important task of will sustainably managing manage the herd and their impact on their habitat. these wild spaces so that natural and historic resources are protected. Through this management, the recreational hunting experience will be enhanced, alongside facilitating public recreation and enjoyment and ecological benefits within the HOSI area of these resources subject to that protection, while considering the day-to-day realities of conservation and wild animal management.~~

The Plan also acknowledges the connection that Treaty partners and iwi Māori have to these areas and seeks to recognise the significance of the Kaimanawa Mountains and Kaweka Range to many New Zealanders.

This Plan represents the culmination of years of effort [in sika herd management](#) by a number of individuals and organisations, including the Central North Island Sika Foundation and the New Zealand Game Animal Council.

I expect there to be a range of benefits from managing sika for hunting purposes. These will be set out in a future Gazette notice should I ultimately decide to designate a Sika Herd of Special Interest. However, it is helpful to briefly comment on expected benefits at this stage in the process.

Of particular importance are the benefits of improved ecological outcomes for indigenous species and ecosystems through targeted population management, regular monitoring and responsible harvest decision making by the hunting community.

Similarly, I expect there to be a range of benefits for hunters, including a higher quality and more sustainable hunting experience and venison yield, due to there being fewer but healthier animals, and an improvement of sika trophy quality over time. By encouraging and enabling greater participation of the sika hunting community and other interested parties in herd management processes, we hope to promote a sense of herd and environmental stewardship and increase voluntary contributions to conservation activity more broadly.

It is my hope there will also be a range of benefits for iwi, hapū and local communities. These include enabling the active involvement of iwi and hapū in sika management activities, increasing our understanding of the impacts sika can have on taonga (treasured) species and mahinga kai (food-gathering) practices, and taking steps towards protecting and restoring culturally significant resources.

Finally, I anticipate that this new approach to sika management will have meaningful economic, social and wellbeing benefits for a range of communities by increasing hunter tourism, support for community and social initiatives, and partnerships between iwi, community groups, businesses and conservation organisations.

If approved, this Plan will provide direction for management of the Sika Herd of Special Interest over the next 5 years.

This is the starting point, and I now invite submissions on this Plan. The submission period closes on Monday 8 December 2025.



Hon James Meager
Minister for Hunting and Fishing

10 November 2025

2 Introduction

A 'herd of special interest' is a herd of game animals within a defined area of public conservation land that the responsible Minister has, in accordance with the Game Animal Council Act 2013, formally designated to be managed for hunting purposes while ensuring that conservation values continue to be protected.

The *Sika Herd of Special Interest Draft Management Plan* (the Plan) has been prepared in accordance with section 19 of the Game Animal Council Act and only becomes effective if the herd of sika (*Cervus nippon*) in the Kaimanawa and Kaweka Forest Parks and Kaweka Forest Conservation Area is designated as a herd of special interest under section 16 of that Act.

Purpose of this Plan

This Plan [recognises the value of the Central North Island sika herd as a HOSI. These values include their historic lineage, unique biology, economic and tourism value and the benefits the deer provide to community wellbeing, directs management of the Sika Herd of Special Interest on behalf of the Minister for Hunting and Fishing.](#) The Plan¹ establishes objectives and strategies for the management of sika in the Sika Herd of Special Interest Area (the Sika Area) to achieve the benefits expected to be gained by managing this herd of deer for hunting purposes.

This Plan applies only to sika existing in the Sika Area, as shown in **Appendix 1**.

This Plan allows for responsive and adaptive management, while also providing clarity on intended outcomes. It does not contain the day-to-day details of operational management. However, the objectives and strategies set the framework for operational management, monitoring and reporting.

Application of the Plan and statutory context

This Plan takes effect from the date stated in the New Zealand Gazette notice formally designating the Sika Herd of Special Interest. It continues to apply until formally amended or replaced by the responsible Minister.

The Sika Area covers parts of Kaimanawa Forest Park, Kaweka Forest Park and Kaweka Forest Conservation Area. The Sika Herd of Special Interest designation and this Plan apply only to the Sika Area and the management of sika within it.

[Upon designation as a HOSI, the Central North Island sika deer in the Sika Area will no longer be classified as a wild animal under the WAC Act and will become a highly valued game species under the GAC Act.](#)

The designation and Plan do not apply to wider conservation management activities provided for by the Conservation Act 1987, Wild Animal Control Act 1977 or relevant statutory planning documents. Those Acts and planning documents continue to apply alongside this Plan. For example, they continue to regulate the hunting of pigs and red deer and non-hunting related concessions and authorisations, and guide conservation and other animal management activity, such as predator control.

The Game Animal Council Act is listed in Schedule 1 of the Conservation Act. This means that the Game Animal Council Act must be so interpreted and administered as to give effect to the principles of the Treaty of Waitangi.¹

A glossary of key terms is provided in **Appendix 2**.

Overriding considerations

This Plan has been prepared to be consistent with the overriding considerations identified in the Game Animal Council Act. For this Plan, the relevant overriding considerations are the:

- welfare and management of public conservation land and resources generally;
- *Conservation General Policy 2005*;²
- *Hawke's Bay Conservation Management Strategy 1994*;³
- *Tongariro/Taupo Conservation Management Strategy 2002*;⁴

¹ Conservation Act 1987, section 4.

² Department of Conservation. 2005. Conservation General Policy. Wellington: Department of Conservation. doc.govt.nz/general-policy

³ Department of Conservation. 1994. Conservation Management Strategy for Hawke's Bay Conservancy 1994-2004. Napier: Department of Conservation. doc.govt.nz/hawkes-bay-cms

⁴ Department of Conservation. 2002. Tongariro/Taupo Conservation Management Strategy 2002-2012. Turangi: Department of Conservation. doc.govt.nz/tongariro-taupo-cms

- *Kaimanawa Forest Park Management Plan 2007*,⁵
- *Kaweka Forest Park Conservation Management Plan 1991*,⁶ and
- pest management strategies and plans made under the Biosecurity Act 1993.

Key parties and relationships relevant to this Plan

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Minister for Hunting and Fishing

The Game Animal Council Act provides a ministerial power to establish herds of special interest, by way of notice, and to manage herds of special interest.

The Minister for Hunting and Fishing is the relevant Minister for the purposes of the Game Animal Council Act, including for the designation of a herd of special interest and development of a related herd management plan. The Minister for Hunting and Fishing has exercised these powers in the making of this Plan and designation of the Sika Herd of Special Interest.

The Minister for Hunting and Fishing may delegate their herd of special interest management powers under the Game Animal Council Act to the New Zealand Game Animal Council (the Game Animal Council), and the Department of Conservation Te Papa Atawhai (the Department) may carry out functions on behalf of the Minister for Hunting and Fishing.

Treaty partners

Ngāti Tūwharetoa, Ngāti Whitikaupeka, Ngāti Tamakōpiri, Ahuriri Hapū, Ngāti Hineuru and Heretaunga Tamatea are the tangata whenua with rangatiratanga or mana whenua (tribal authority) over parts of the area covered by this Plan. They are the Crown's Treaty partners under the Treaty of Waitangi, and this Plan acknowledges the obligation on the Crown to give effect to the principles of the Treaty as set out in section 4 of the Conservation Act. The Department often engages with these Treaty partners through the post-settlement governance entities identified below, as those entities are mandated to represent hapū within their takiwā. The relationship between Treaty partners and the Minister of Conservation is the primary relationship with respect to the management of Kaimanawa Forest Park, Kaweka Forest Park and Kaweka Forest Conservation Area.

Treaty partner areas of interest relevant to this Plan

Ngāti Tūwharetoa

The entirety of Kaimanawa Forest Park and the northwestern parts of Kaweka Forest Park. The Ngāti Tūwharetoa Claims Settlement Act 2018 establishes Te Piringa agreement between the Crown, through the Minister of Conservation and the Director-General of the Department, and Te Kotahitanga o Ngāti Tūwharetoa (being the post-settlement governance entity established through the Ngāti Tūwharetoa Deed of Settlement).

Ahuriri Hapū

The part of Kaimanawa Forest Park near the Ngaruroro River headwaters, particularly around the Oāmaru River and Te Matia Stream, and large areas of Kaweka Forest Park and Kaweka Forest Conservation Area, including around Don Juan peak, Whittle Road and the length of the main Kaweka Range. The Ahuriri Hapū Claims Settlement Act 2021 establishes Te Kawa o Papa between the Crown, through the Minister of Conservation and the Director-General of the Department, and the Trustees of the Mana Ahuriri Trust (being the Ahuriri Hapū post-settlement governance entity established through the Ahuriri Hapū Deed of Settlement).

Ngāti Hineuru

Kaimanawa Forest Park from the Kaipo and Oāmaru Rivers in the eastern Kaimanawa Mountains, and the northern and eastern parts of the Kaweka Range around Te Pukeohikaura, Te Puia and Mangatutu. The Hineuru Claims Settlement Act 2016 establishes Te Kawenata between the Trustees of Te Kōpere o te iwi o Hineuru Trust (being the post-settlement governance entity established through the Hineuru Deed of Settlement), the Minister of Conservation and the Director-General of the Department.

Heretaunga Tamatea

The area around Kuripapango. Other areas of Kaweka Forest Park within the Heretaunga Tamatea area of

⁵ Department of Conservation. 2007. *Kaimanawa Forest Park Management Plan*. Wellington: Department of Conservation. doc.govt.nz/kaimanawa-management-plan

⁶ Department of Conservation. 1991. *Kaweka Forest Park Conservation Management Plan* Napier: Department of Conservation. doc.govt.nz/kaweka-management-plan

interest (such as the Kaikomata and Glenross Ranges) are outside the Sika Area and are not directly relevant to this Plan. The Heretaunga Tamatea Claims Settlement Act 2018 between the Trustees of the Heretaunga Tamatea Settlement Trust (being the post-settlement governance entity established through the Heretaunga Tamatea Deed of Settlement) and the Crown is relevant to the management of this area.

Ngāti Whitikaupeka and Ngāti Tamakōpiri

The southern reaches of Kaimanawa Forest Park and southwestern aspects of Kaweka Forest Park. At the time of writing, Ngāti Whitikaupeka and Ngāti Tamakōpiri are working through a Treaty settlement process with the Crown as part of the collective represented by Mōkai Pātea Waitangi Claims Trust.

Other Treaty partner interests and relationships

In many places, the public conservation land subject to this Plan shares a boundary with land owned or managed by entities affiliated with Treaty partners, including land parcels that are protected by Ngā Whenua Rāhui kawenata. Although this adjacent land is not directly subject to the Sika Herd of Special Interest designation, many of the entities who own or manage that land are keenly interested in this Plan.

New Zealand Game Animal Council

The Game Animal Council is a statutory entity established under the Game Animal Council Act.

This Council has a range of functions in relation to game animals, which include deer, tahr, chamois and wild pigs. These functions include advising and making recommendations to the Minister for Hunting and Fishing, raising awareness of the views of the hunting sector, providing information and education, promoting codes of conduct and operating certification schemes, and liaising with hunters, representatives of tangata whenua and organisations to improve hunting opportunities.

The Minister for Hunting and Fishing may delegate powers to manage a herd of special interest to the Game Animal Council. These powers must be exercised for the effective management of the herd, consistent with the management of public conservation land and resources generally, and in accordance with the Game Animal Council Act. Subject to the terms of any delegations, it is anticipated that the Game Animal Council will work closely with the Central North Island Sika Foundation (the Sika Foundation) and the Department to implement this Plan.

Under the Game Animal Council Act, the Game Animal Council also has a function to assess the costs of managing sika as a herd of special interest (and herds of special interest more broadly) and to make recommendations to the Minister for Hunting and Fishing on ways to recover those costs.

Central North Island Sika Foundation

The Sika Foundation was formed in 2015 to engage with the sika hunting community, the Department, the Game Animal Council, tangata whenua and other stakeholders to explore designating a Sika Herd of Special Interest.

Since its inception, the Sika Foundation has sought to better understand the sika herd and educate hunters and the wider community about management regimes that protect the special nature of both the Central North Island and the sika herd.

The objectives of the Sika Foundation are to:⁷

- actively manage the Central North Island sika herd to provide enhanced levels of protection for the forests and grasslands in which these animals live and improved benefits to hunters;
- advance a management regime that involves a collaborative partnership between recreational sika hunters, the Game Animal Council, the Department, local iwi, interested landowners and other stakeholders;
- achieve and maintain consistent, appropriate harvest levels of healthy sika through improved coordination of recreational sika hunting and other management actions, as required; and
- increase the understanding by recreational sika hunters and the wider community of the sika herd, its value and management through better information and education.

In early 2025, the Sika Foundation proposed that the Minister for Hunting and Fishing initiate a process to consider designating sika as a herd of special interest under the Game Animal Council Act. The Sika Foundation will likely be engaged to undertake many aspects of the day-to-day implementation and delivery of this Plan, including animal management and control, hunter management, and educational initiatives.

⁷ The constitution of the Sika Foundation is available at sikafoundation.co.nz/our-objectives.

Department of Conservation Te Papa Atawhai

The Department is responsible for administering conservation legislation such as the Conservation Act and Wild Animal Control Act. It has a responsibility to promote conservation of New Zealand's natural and historic heritage resources, foster recreation, and allow tourism. The Department also has a responsibility under section 4 of the Conservation Act to give effect to the principles of the Treaty of Waitangi.

The Department administers the Game Animal Council Act in relation to the Sika Herd of Special Interest. On behalf of the Minister for Hunting and Fishing, the Department leads the statutory process to develop herd management plans and ensure that legislative requirements are met. The Department will support implementation of this Plan in accordance with delegations and directions of the Minister for Hunting and Fishing.

3 Values

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The value of the Sika Herd

The Central North Island Sika herd is unique, with its value derived not only from its biology but from its deep integration into the history, economy, and community fabric of the region. As the only wild herd of Sika deer in the Southern Hemisphere, this population represents a recreational hunting resource of national and international significance.

Statutory recognition

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The high value of this herd is already enshrined in existing statutory planning documents. The Kaimanawa Forest Park Plan notes the herd's significance, while the Kaweka Forest Park Plan identifies hunters as the park's largest single user group. While other statutory instruments focus on conservation outcomes, this HMP is the critical instrument dedicated to the value of the herd.

Biological uniqueness

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Biologically, the herd offers a unique experience. Sika are vocal, inquisitive, yet elusive. These traits, combined with distinct markings and the potential for high-quality antlers, make hunting them a rare challenge. This trophy element is a key driver for recreational hunters, offering a pursuit that cannot be replicated elsewhere.

Health, wellbeing and connection

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The value of the herd extends well beyond the act of harvesting an animal. It plays a vital role in the physical and mental health of the hunting community.

- Pursuing Sika requires immersion in the rugged Central North Island backcountry. This fosters a deep appreciation for New Zealand's wilderness and builds a connection between people and the natural environment which has proven health benefits.
- Sika hunting is frequently a shared activity, strengthening bonds between friends and whānau. It serves as a vehicle for intergenerational connection, where skills, ethics, and respect for the environment are passed down through generations.
- The challenging terrain and the elusive nature of the Sika provide a high-value adventure experience.

Food security and community benefit

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The Sika herd is a crucial source of free-range, organic protein. For many hunters, filling the freezer is the primary motivation, providing food security for their immediate families.

Beyond personal consumption, the herd supports wider community welfare. Over the past three years, hunters and management activities have provided over eight tonnes of venison to local foodbanks and families in need.

The herd generates substantial domestic and international tourism. This is best exemplified by the Sika Show, the Southern Hemisphere's largest annual hunting tradeshow, which underscores the economic ecosystem built around this specific herd.

The critical role of access

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To realise these values, secured and maintained access is paramount. Access is not merely a recreational privilege; it is the fundamental mechanism for herd management.

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Recreational hunters are the primary tool for managing the sika herd and require reliable access to HOSI area (including difficult to reach areas). Access enables the transfer of the herd's value to the community through the physical retrieval of meat, the mental health benefits of time in nature, and the economic flow to local townships.

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Conservation values

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Despite the impacts of introduced species, the Kaimanawa and Kaweka Forest Parks contain a wide range of ecosystems and significant biodiversity.

The parks are dominated by beech forest and alpine plant communities. There are smaller areas of podocarp-broadleaf forest and ecologically significant habitats.

The forest fauna is diverse, supporting several rare and threatened species including pekapeka (long-tailed

bat), kiwi-nui (North Island brown kiwi), whio, kārearea (New Zealand falcon), North Island kākā, koekoeā (long-tailed cuckoo), mātātā (North Island fernbird), toutouwai (North Island robin) and kākārīki.

Conservation values are supported by active stewardship by the hunting, and wider, communities.

Cultural values

This section should be completed by iwi and hapū.

Heritage values

The HOSI area encompasses significant heritage features reflecting its history of human use.

Features from the early European period remain in the landscape, including the Iron Whare musterer's hut (dating back to the 1870s) and the Armed Constabulary Stockade near Tarawera.

The sika herd represents a direct historical link between the Crown and the hunting community, originating from a gift by the Duke of Bedford to the New Zealand Government in 1904.

Community values

The Kaimanawa and Kaweka Forest Parks are a focal point for a wide range of community activities and values.

Beyond hunting, the parks are prized by trampers, anglers seeking brown trout, and paddlers rafting the rivers. The area offers both accessible recreation at road ends and challenging wilderness experiences in the Remote Experience Zone.

The area is used by outdoor education and school groups. Community groups contribute to the maintenance of backcountry huts and bivies.

While perspectives on sika differ, there is a shared community desire to see improved management of the area.

4 and kKey context

The Sika herd

The Central North Island sika herd represents a direct historical link between the Crown and the New Zealand hunting community. The herd originated from a gift (koha) from the Duke of Bedford in England to the New Zealand Government. These animals were received by the Tourist and Publicity Department in 1904 and released on Poronui Station in January 1905. Sika eventually outcompeted red deer and the range of sika now covers approximately 9,000 square kilometres of the Central North Island, across various land tenures.

Managing the Sika Herd of Special Interest for hunting purposes involves focusing management efforts on sika hinds. Hinds have smaller home ranges than stags, meaning overabundant female groups can cause intense localised impacts. By contrast, stags are the preferred target of recreational hunters.

A male-biased population benefits hunters by ensuring sufficient males are available for harvest, enhancing rut hunting experiences due to the vocal nature of sika stags. Increased mating competition in a male-biased population encourages sexual dimorphism, leading to larger bodies and antler sizes over time.

Maintaining the population of sika at low levels reduces environmental impacts, leading to increased availability of preferential browse plants. This improves the health of the sika - increasing fawn survival and antler growth. Population management simultaneously enhances the hunting experience by immersing hunters in a thriving environment. The presence of species such as kiwi, ruru, and whio enhances the value of the hunt, proving that hunting values and conservation values can be symbiotic.

The hunting community

It is important to recognise that Sika hunters are not solely consumers of a resource but are also active custodians of the environment. Hunters understand that a high-quality herd requires a high-quality ecosystem, meaning the value of the hunting experience is inextricably linked to the health of the habitat.

This stewardship is demonstrated through significant voluntary action. In 2023 alone, the Central North Island Sika Foundation contributed 7,200 hours of volunteer work to wider conservation. This included servicing over 60 kilometres of traplines to protect indigenous species such as whio (blue duck) and pekapeka (bats).

Adoption of the Sika HOSI management approach is intended to encourage this collective action for sika management and the conservation of indigenous flora and fauna generally.

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3

Natural heritage and conservation values Geographical context

Kaimanawa Forest Park (77,348 hectares) was established as a land management unit in 1969, most of which is centred on the Kaimanawa Mountains.

The topography of Kaimanawa Forest Park is characterised by:

- four main mountain ranges running northeast to southwest in the south and southwest;
- a complex multi-directional ridge system in the northeast; and
- gently sloping terrace land in the north.

Elevations range from 560 metres above sea level in the north to 1,727 metres above sea level at the summit of Makorako. In summer, this Park can be very hot and dry, while in winter, inhospitable snow and blizzards are common at higher elevations.

The adjoining Kaweka Forest Park (59,000 hectares), which covers most of the Kaweka Range, was gazetted in 1974. Kaweka Forest Conservation Area (1,146 hectares) adjoins Kaweka Forest Park around Don Juan peak and is integrated with Kaweka Forest Park for management purposes. Therefore, the information below regarding Kaweka Forest Park applies equally to Kaweka Forest Conservation Area.

The topography of Kaweka Forest Park is similar to that of Kaimanawa Forest Park, with the main Kaweka Range a dominant feature, running roughly north to south along the Park's eastern flank. A number of other ranges and high points are also prominent, particularly Te Pukeohikarua and the Black Birch and Kaikomata Ranges. The Park is also characterised by numerous stream and river valleys, most notably the Ngaruroro, Tutaekuri, Ngaawapurua/Harkness, Donald and Makino.

Like Kaimanawa Forest Park, Kaweka Forest Park covers a range of elevations, from 213 metres above sea level where the major rivers leave the Park up to the high point of the Kaweka Range at 1,724 metres above sea level. The Park also experiences a dramatic range of weather conditions, from hot and dry periods in the summer through to freezing snowstorms during the winter months.

Ecological context

Biodiversity in Kaimanawa Forest Park typically comprises montane and alpine species. It is dominated by beech forest and alpine plant communities and animals that are commonly associated with these. It contains a large area of alpine habitat, while smaller areas of podocarp-broadleaf forest occur in the southwest.

Most of the vegetation in Kaimanawa Forest Park, except in the extreme south, was destroyed by the last eruption of the Taupō Volcano in 186 AD. The forest then fully returned but was later reduced in extent, particularly in the south and most of the larger river valleys, by Māori and European fires. Where fires occurred, there is now a mosaic of red tussock grassland, scrub and smaller pockets of beech forest.

The Kaweka Range is the driest section of the North Island mountain axis, and plant compositions reflect this. Vegetation varies from indigenous forest to alpine grasslands and scrublands. On the eastern flanks, infestations of wilding pines (particularly *Pinus contorta*) are a significant issue.

In both forest parks, vegetation destruction through volcanic activity, man-made fires and erosion was further exacerbated by the introduction of pigs, goats, possums and deer. However, despite the effects of burning, grazing and wild animals, the forest parks still contain a wide range of ecosystems, some of which are ecologically significant. The forest fauna is typical of alpine and beech forest communities, with a diverse range of bird species reflecting the different types of habitats that are present.

Historical context

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The area was widely used by Māori as a hunting ground for kiore and birds in the pre- and early European period. In the 1860s, European farmers introduced sheep to the area, using fire to burn off native grasses, native forest and scrub for pasture. In the early 20th century, the spread of rabbits, erosion and the challenging climate led to grazing on the main range being abandoned.

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Several rare and threatened species have been recorded, including the pekapeka / long-tailed bat, kiwi-nui / North Island brown kiwi, whio / blue duck, kārearea / New Zealand falcon, North Island kākā, koekoeā / long-tailed cuckoo, mātātā / North Island fernbird, toutouwai / North Island robin and kākāriki / parakeets. The management of the area has evolved significantly over the last century. Kaimanawa Forest Park was established in 1969, followed by Kaweka Forest Park in 1974. In recognition of the herd's sport-hunting potential, parts of both parks were gazetted as Recreational Hunting Areas in the 1980s.

Management of deer has shifted between periods of intense control and recreational focus. The Kaweka Mountain Beech Project (1998-2015) used aerial control to restore forest canopy. Although this project was deemed to be successful, it was short-lived so did not result in the sustainable management of the herd.

In 2022, with funding from the Department and support from the Game Animal Council, the Sika Foundation began a new programme of adaptive deer management and research in the forest parks.⁸ This involved professional ground and aerial deer culling operations by specialist operators using thermal imaging equipment to target hinds, and facilitating access for recreational hunters into the 15,000-hectare Remote Experience Zone in Kaimanawa Forest Park.⁹ The programme recognised that hind-focused management reduces the reproductive output of the herd and the associated stress on the environment. Between 2022 and 2025, the programme removed over 1,100 deer, and the results informed future habitat management strategies.

⁸ Further information is available on the Sika Foundation's website: sikafoundation.co.nz/adaptive-deer-management-plan-2022-2025.

⁹ The Kaimanawa Forest Park Remote Experience Zone is shown on Map 1 of the *Kaimanawa Forest Park Management Plan 2007*: doc.govt.nz/kaimanawa-management-plan.

Conservation and introduced species

The introduction of red deer, sika, pigs, possums, horses, goats, hares, rabbits, rats, mice, hedgehogs, cats and mustelids to the Kaimanawa Mountains and Kaweka Range has caused significant ecological change over the last century. A key issue is the management of impacts by deer.

Red deer were introduced to the area in 1901, and the population grew steadily. Sika were then liberated in 1905 near the northeastern end of what is now Kaimanawa Forest Park and eventually outcompeted red deer. The range of sika now covers approximately 9,000 square kilometres of the Central North Island, across various land tenures.

Deer have caused palatable understorey species like puahou / five finger and patō / seven finger to be replaced by unpalatable species such as horopito and crown fern within forest habitats in the forest parks. Deer are also compromising canopy replacement at some sites. Research indicates that regeneration is possible where most of a deer population at a site is removed through intensive management, but this is generally slow, location specific and costly to sustain. Plant growth also depends on light and nutrient availability, so competition from deer avoided species may slow down the recovery process, leading to long-term changes in forest composition.

Biodiversity declines and changes in community composition can reduce ecological resilience, including resilience to the impacts of climate change.

Deer control is expensive, with eradication and the maintenance of deer-free areas costing significantly more than suppression (population reduction) activities over the same area. Therefore, prioritisation is undertaken, and emphasis is placed on controlling deer to protect priority areas and species. Sika management in the Sika Area is complicated by the distribution of sika and the fact that they often move across boundaries between the Sika Area and adjacent land.

Deer management and control in the forest parks has evolved over time. Between 1998 and 2015, the Department led a programme of aerial deer control to manage numbers within Kaweka Forest Park. Known as the Kaweka Mountain Beech Project, this programme aimed to restore and protect tawhairauriki / mountain beech forests in Kaweka Forest Park from the impacts of deer browsing.⁸ It involved monitoring seedling recruitment, growth and mortality across various plots, and assessing the effectiveness of deer control methods such as fencing, aerial hunting and recreational hunting. The project used adaptive management principles and also sought to enhance recreational hunting experiences. Aerial control of deer was the primary method used to support forest regeneration. As part of the programme, analysis and modelling of vegetation monitoring data predicted that aerial deer control during the vulnerable seedling and sapling phases leads to canopy and gap closures in mountain beech forest at most open sites within 40 years. The use of other, less intensive methods in isolation was shown to be significantly less effective, with far longer recovery times.

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⁸ For further information, see: Duncan R, Ruscoe W, Richardson S, Allen R. 2006. Consequence of deer control for Kaweka mountain beech forest dynamics. Napier: Department of Conservation. Landcare Research Contract Report LC0607/021. doc.govt.nz/documents/conservation/threats-and-impacts/animal-pests/kaweka-deer-control.pdf

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Hunting and recreation values

Sika herd

The sika herd in the Sika Area is part of the only wild herd of sika in the Southern Hemisphere and draws international and domestic hunters to the Central North Island. Sika have unique markings, produce high quality antlers and are elusive, all of which make them attractive to hunters.

The sika which are now part of the Herd of Special Interest can be linked back to sika gifted by the Duke of Bedford in England to the New Zealand Government. The gifted animals were received by the Tourist and Publicity Department in 1904 and released on Poronui Station on the northern boundary of what is now Kaimanawa Forest Park in January 1905.

Over time, the sika population adapted well to the local conditions and spread widely. From the 1960s, sika became the subject of studies focused on their dispersal, habitat use and potential for hybridisation with other deer species. Throughout the 1970s to 1990s, sika came to increasingly dominate red deer within the Sika Area as a result of their superior physiology and ability to outcompete other species.

At the same time, the popularity of the sika hunting experience continued to grow. In recognition of the sport-hunting potential of the sika herd, the northern part of Kaimanawa Forest Park and eastern part of Kaweka Forest Park were gazetted as recreational hunting areas under the Wild Animal Control Act in 1982 and 1986, respectively. These recreational hunting areas (or RHAs) were intended as places where recreational hunting is the primary means of controlling deer, with management actions to be guided by wild animal control plans issued by the Director General of the Department. Although only one Kaimanawa wild animal control plan was made, recreational hunting opportunities in the Kaimanawa and Kaweka Ranges remain highly significant to the hunting community.

During the sika rut, large numbers of hunters descend on the Sika Area, and it is not uncommon for hundreds of vehicles to be parked along key access points into the area.

While accessible locations see significant hunting pressure, the more remote parts of the Sika Area are exposed to comparatively little hunter activity. This is particularly the case outside the rut, with the Kaimanawa Remote Experience Zone and harder-to-reach parts of the Kaweka Range often seeing little recreational hunting pressure. In these areas, limited access opportunities affect the contributions recreational hunter activity can make to sika population management.

The sika hunting experience draws people from throughout the North Island and beyond. Sika hunting trade shows and events, hunter tourism, commercial activity, and related social enterprise all contribute to a vibrant and passionate sika hunting community.

5. Hunting and managing sika for hunting purposes

Sika have generally been hunted year round in the Sika Area, but the best time to hunt them is widely considered to be between late February and August, but particularly during the autumn roar (mid-March to the end of April), when emboldened stags (male sika) are vocal to attract hinds (female sika), and during spring, when sika feed on new plant growth.

Stags are hunters' preferred target because of their impressive antlers, which can reach between 11-30 inches long and can have 6-8 points.

This Plan sets objectives and strategies for the management of sika within the Sika Area for hunting purposes in a way that is consistent with the overriding considerations outlined in section 1 and in accordance with the Game Animal Council Act. This involves taking an adaptive management approach, with a particular focus on improving habitat health to increase animal quality and enhance the sika hunting experience. It encourages hunters to act as caretakers for the Sika Area (and the environment more broadly) rather than end-use consumers. A herd of special interest designation is the only management tool that specifically provides for the management of game animals for hunting purposes on public conservation land.

Managing the Sika Herd of Special Interest for hunting purposes involves focusing [management control](#) efforts on sika hinds, which will have both environmental and hunting benefits. Hinds have smaller home ranges than stags, which means that overabundant female groups can cause intense localised impacts. By contrast, stags spend more of their time in alpine areas, tussock grasslands, farm edges and forestry mosaics outside the Kaimanawa and Kaweka beech forests.

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The abundance of stags is managed through hunter harvest, as they are the preferred target of recreational hunters. A male-biased population benefits hunters by ensuring that there are sufficient males available for harvest despite a smaller population overall. It also enhances rut hunting experiences, which are considered to be the pinnacle of sika hunting due to the vocal nature of sika stags.

In a male-biased population, multiple males compete for mating rights with the lower proportion of healthy cycling females. This increased mating competition encourages sexual dimorphism, where traits such as a larger body and antler size become more prominent over time. These larger, more dominant stags are more likely to win the right to breed with cycling hinds, allowing them to pass their genes to the next generation, which leads to intergenerational changes in the sika herd that are desirable to hunters.

Maintaining the sika population at low levels reduces the environmental impacts on flora, leading to an increased availability and diversity of preferential browse plants. This, in turn, improves the health of sika, which increases fawn survival, body size, body fat content and antler growth, leading to an improved quality and quantity of venison and antlers.

Improved habitat health also contributes to an enhanced sika hunting experience. Being immersed in a thriving environment with a diversity of palatable species in the browse tier, hearing kiwi and ruru/moreporks calling at night, observing whio in the rivers, and seeing flocks of kākā and kererū in the canopy all enhance the hunting experience.

The ongoing management of deer populations will also reduce deer-induced impacts on some non-canopy palatable species within the forest parks. Even a low-density sika population is likely to affect the regeneration of highly preferred palatable species in deer-accessible sites, but less-preferred palatable species will benefit from the sika population being maintained well below the maximum sustainable yield. Highly preferred palatable species can be found throughout the forest parks in locations that are inaccessible to deer, such as on stream banks, bluff systems, and stumps and beech buttresses in windfall areas, as well as on other plants as epiphytes.

Adoption of the Sika Herd of Special Interest management approach is intended to encourage collective and concerted action for sika management and the conservation of indigenous flora and fauna in Kaimanawa Forest Park, Kaweka Forest Park and Kaweka Forest Conservation Area generally. It seeks to do this by recognising and providing for a range of values, conservation outcomes, communities and recreational activities, and by building on recent collaborative efforts between the Sika Foundation, the Department and others to improve sika management. This, in turn, is expected to expand the number of people contributing to conservation efforts more broadly.

Monitoring, research and reporting to support management

Monitoring is an important aspect of herd management, as it provides information that allows the effectiveness of management actions to be evaluated and the objectives for managing sika for hunting purposes to be met. A range of methods and tools are currently available to be used for monitoring. As advancements are made, monitoring methods can be adjusted or improved to establish more robust and timely appropriate data collection and adapted annually to ensure that the most appropriate method is being implemented to build on the data already collected and within the timeframe in which the information is needed. Adjustments or improvements to monitoring, if made, must consider integration or comparability with previously applied monitoring protocols to enable long-term reporting, to build on the data already collected.

Research will allow the effectiveness of management to be improved and support the objectives and strategies for managing sika for hunting purposes being met.

Reporting on herd management activities shows progress in meeting the objectives and strategies. This provides transparency and accountability to Treaty partners, stakeholders and members of the public who are interested in the management of the Sika Herd of Special Interest. Regular reporting will also support an efficient and effective plan review process.

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Culture, heritage, community and stewardship values

There are a range of views on sika and how they should be managed. Some see sika as an introduced species and so think that the animals should be removed. Others seek to realise the value of the herd as a part of the contemporary cultural and community context of the Central North Island. Although perspectives on the animals differ, there is a shared desire to see improved management of the Sika Area. This reflects the significant cultural, heritage and stewardship values associated with this area.

Tangata whenua have a long standing and profound connection with the Sika Area through concepts including tūrangawaewae (a place to stand or place of belonging) and whakapapa (genealogical lineage). These connections can transcend both the physical and spiritual worlds. Many tangata whenua are deeply concerned about the degraded state of the ngahere (forest) and the threats introduced species pose to taonga species, traditional practices and indigenous biodiversity, as well as being able to meaningfully exercise kaitiakitanga (guardianship) and contribute to improving outcomes.

The Sika Area also has a long history of European influence and activity. A number of significant heritage features from the early European period remain, including the Iron Whare musterer's hut made from vertical slab tōtara and dating back to the 1870s, and the Armed Constabulary Stockade near Tarawera.

More recently, parts of Kaweka and Kaimanawa Forest Parks within the Sika Area have become a focal point for hunters and trappers, with many travelling from around the North Island to enjoy the rugged terrain, unique flora and fauna, and extensive network of backcountry huts and tracks here. The relatively accessible nature of the forest parks, particularly from Littles Clearing and Kuripapango, as well as the Lotkow, Makahu, Clements Mill and Kaimanawa Road ends, contributes to their popularity.

At the other end of the spectrum, the Kaimanawa Remote Experience Zone in the southeast of Kaimanawa Forest Park is relatively difficult to access and prized by a range of park users for its relatively untouched nature and provision of one of only a few wilderness like experiences in the North Island.

Many of the rivers within the Sika Area are popular with anglers, with the brown trout fishery being a highly sought after experience. These same rivers and waterways are also popular with paddlers, who enjoy rafting and kayaking in many places within Kaimanawa and Kaweka Forest Parks.

Throughout the same area, a range of community conservation and stewardship initiatives are undertaken by several groups, including the Sika Foundation. These efforts focus on predator trapping to support native bird species—particularly whio, North Island brown kiwi and short-tailed bats. A range of groups are also increasingly interested in and contributing to efforts to maintain recreation infrastructure, particularly the network of huts and bivies located throughout the Sika Area. Given its accessibility, the area is also popular with outdoor recreation, school and other groups. Concessionaire activity within the Sika Area is focused on outdoor recreation and education, research, and infrastructure.

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46 Objectives and strategies

This section sets out the approach to be taken for managing the Sika Herd of Special Interest to ensure that the objectives for managing sika for hunting purposes are met.

Objectives

Objective	Description
1	Provide for high-quality hunting experiences through management of the Sika herd. 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.
2	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. The sika hunting experience is enhanced while contributing to overall management and regeneration of the Sika Area.
3	Collaboration between hunting management organisations (the Department, the Game Animal Council, and the Sika Foundation), and partnership between those organisations and tangata whenua (Ngāti Tūwharetoa, Ngāti Whitikaupeka, Ngāti Tamakōpiri, Mana Ahuriri Trust, Hineuru Iwi Trust, Tamatea Pōkai Whenua), is maintained and strengthened. Opportunities for tangata whenua to exercise tino rangatiratanga and kaitiakitanga in the Sika Area are identified and implemented where appropriate. Seek to generate in-kind support, and revenue through partnerships and sponsorships, to contribute to the cost of delivering this Plan.
4	Build or maintain hunter and community involvement in: <ol style="list-style-type: none"> a. Initiatives that enhance the recreation, use and enjoyment of the public in the Sika Area, and. <p>Conservation initiatives that promote the health and wellbeing of indigenous plants and animals. Engage the hunting community in the management of sika and the Sika Area so the community provide support for local conservation and social initiatives.</p> <ol style="list-style-type: none"> b.
5	Build or maintain sources of income, partnerships, and in-kind support that support and advance the other objectives of this HMP.
4	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.
6	Apply an adaptive management framework based on monitoring and research to implement this plan.
5	Knowledge and understanding of the dynamics between sika and indigenous species and ecosystems are improved.
6	Monitoring enables adaptive management and demonstrates whether the management of sika is achieving the objectives of this Plan.
7	Research supports and enhances the management of sika and the Sika Area.
8	Public reporting provides information on whether the Plan is achieving the Objectives.

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Strategies

Strategy	Description
1	Use a range of tools to manage the Sika Herd of Special Interest and improve the hunting experience.
General	
1.1	Set and review annual sika management targets to manage populations in a way that aligns with the objectives and strategies of this Plan.
1.21.1	Coordinate and manage recreational hunting, herd management hunts, and professional control management operations and harvest activity/ herd management activities to selectively remove sika in a way that:

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- a) prioritises areas for [population-herd controlmanagement](#);
- b) protects and enhances the hunting experience [during the sika rut](#); and
- c) achieves a male-biased population, with a higher proportion of older males.

1.3 [Apply other management options if recreational hunting is insufficient to maintain a sika population that achieves the ecological objectives of this Plan.](#)

General recreational hunting

1.41.2 Operate a hunting authorisation system for hunting sika within the Sika Area, and require hunters to obtain an authorisation and adhere to its conditions.

1.51.3 Specify hunting conditions by notice in the Gazette, including conditions relating to the periods and times when sika may be hunted.¹⁰¹¹

1.61.4 Allow open hunting area access to Sika Herd of Special Interest hunting opportunities unless this would pose substantial safety risks, the level of demand is reducing hunter satisfaction or restriction is otherwise required for management purposes.

1.71.5 Explore opportunities to establish a hunter ballot or booking system in the Kaimanawa Remote Experience Zone during the sika rut period [for herd management purposes](#).

1.81.6 Work with relevant groups and organisations to manage recreational hunting access [for short periods outside the sika rut](#) where necessary to support [population-herd](#) management activities.

1.91.7 Encourage hunters to:

- a) target the removal of hinds to reduce the population of breeding females; and
- b) [selectively remove sika to increase the proportion of older males in the herd.](#)

b)1.8 [Work with the hunting community when developing hunter authorisation, education and promotional materials to ensure that these appropriately recognise and provide for their values and interests.](#)

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Herd management hunts

1.101.9 Provide opportunities for the hunting community and other interested parties to contribute to and participate in herd management hunts.

1.111.10 Focus herd management hunts on opportunities to:

- a) facilitate access to parts of the Sika Area where access is difficult, recreational hunter activity is limited or sika abundance is particularly high;
- b) increase awareness in the hunting community of the impacts of sika on these parts of the Sika Area; and
- c) contribute to [animal-herd managementcontrol](#) activities.

1.121.11 [Seek opportunities to r](#)Recover venison from sika removed as part of herd management hunts where efficiency and effectiveness are not compromised.

Professional [control-herd management](#) operations

1.131.12 Undertake professional [control-herd management](#) operations where recreational hunting and herd management hunts are insufficient to maintain a sika population that achieves the objectives of this Plan.

1.141.13 [Seek opportunities to r](#)Recover venison from sika removed as part of professional [control-herd management](#) operations where efficiency and effectiveness are not compromised.

2 Undertake monitoring and research to support management and decision making.

Monitoring

2.1 Develop and implement a monitoring programme that [at appropriate geo-temporal scales, measures wapiti impacts, herd health and quality, and the benefits achieved through other management activities.](#) This should include the following:

- a) Ecological monitoring, which may include, but is not limited to, the following methods and tools:
 - i. Seedling ratio index
 - ii. Permanent 20 x 20 metre plots
 - iii. Alpine deer browse
 - iv. [Faecal-pellet counts](#)
- b) Exploring the use of new monitoring methods, tools and technologies, and seeking the views of tangata whenua, [the Tongariro-Taupō Conservation Board, Game](#)

¹⁰ Game Animal Council Act 2013, section 18(2).

[Animal Council](#), [the East Coast Hawke's Bay Conservation Board](#) and the Department prior to their use ~~in the Sika Area~~.

- c) Monitoring [herd health including the size and condition of animals, growth rates, antler quality, genetic diversity and herd structure](#), ~~the hunter harvest, including the hunter contribution to control targets and the age and length of jaws from animals harvested to determine the herd age structure, genetic integrity and growth rates~~.
- d) Monitoring voluntary and partnership contributions to the key management objectives.
- e) Monitoring hunter [harvest and satisfaction](#) ~~with the management of the Sika Herd of Special Interest~~, including, but not limited to, the:
 - i. quality of sika available; and
 - ii. authorisations processes, including the information available to hunters prior to and after their hunting trips.

2.2 Undertake ecological monitoring [using best practice methods and standards, in accordance with relevant standards used or set by the Department](#).

2.3 Include the results from all monitoring in an annual report (see strategy 5 below).

Research

2.4 ~~Seek opportunities to u~~Undertake or support research relevant to the management of sika and/or their effects within the Sika Area, [including research on the resilience of the herd and the impact of herd management mechanisms](#).

2.5 Explore opportunities with tangata whenua to incorporate mātauranga Māori (Māori knowledge) in management and research activities, and increase understanding of the impact of sika on taonga species.

2.6 Undertake relevant research, ~~which may relate~~[including research related to, but is not limited to, the:](#)

- a) ~~spread, behaviours and~~ effects of sika on indigenous flora, and how this compares with that of other deer species;
- b) movement patterns and habitat utilisation of sika within the Sika Area; and
- c) ~~changes in the health and composition of the sika herd over time,~~
- e)d) [Hunter harvest and satisfaction](#)

2.7 Address relevant research findings in an annual report.

3 Work closely with iwi and hapū to manage sika.

3.1 ~~Seek to e~~Establish a forum or rōpū (group) with relevant iwi and hapū to enable the sharing of perspectives and enhance opportunities for iwi and hapū to be involved in management of the Sika Herd of Special Interest, [to the extent they would like to be](#).

3.2 ~~Seek to e~~Create opportunities for iwi and hapū to be actively involved in delivering herd management activities, [to the extent they would like to be](#).

3.3 Engage with Treaty partners when developing partnerships with others to ensure that the interests and values of tangata whenua in relation to such partnerships are considered.

3.4 Work with Treaty partners when developing hunter authorisation, education and promotional materials to ensure that these appropriately recognise and provide for their values and cultural information.

4 Foster partnerships and community stewardship.

Partnerships

4.1 ~~Seek to d~~Develop partnerships and commercial opportunities [associated with sika](#) to help meet the costs of implementing this Plan.

[4.2](#) Actively promote the Sika Herd of Special Interest hunting experience to domestic and international markets.

[4.24.3](#) [Develop and maintain collaborative relationships with the owners and managers of land neighbouring the Sika Herd of Special Interest, to so that herd management considers the needs of neighbours, and facilitates effective herd management across property boundaries.](#)

Stewardship

[4.34.4](#) Provide educational opportunities for communities, hunters and interested parties about

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the:

- a) contribution that managing sika for hunting purposes makes to improving forest and herd health;
- b) impacts of sika on the environment and conservation values, and what the objectives of this Plan are working to achieve;
- c) selection of sika when hunting to improve conservation values, herd health and recreational outcomes;
- d) Sika Herd of Special Interest hunting experience;
- e) visitor requirements and behaviours on public conservation land; and
- f) requirements for hunting safely.

4.44.5 Provide a range of opportunities for the hunting community and other interested parties to actively contribute to sika herd management ~~and control~~ activities.

4.54.6 Work with the local communities in the Central North Island to develop opportunities to participate in activities such as open days, hunter training and education days.

4.64.7 Work with the professional and recreational hunting communities to facilitate and support social initiatives, such as local foodbanks and charities.

4.74.8 ~~Seek to p~~ Provide a range of opportunities for the hunting community and other interested parties to contribute to wider conservation initiatives within the Sika Area, such as predator trapping and control programmes and the maintenance of public recreation infrastructure.

4.84.9 ~~Seek opportunities to w~~ Work with the owners and managers of private land adjoining Kaweka Forest Park, Kaimanawa Forest Park and Kaweka Forest Conservation Area to improve the management of sika beyond the Sika Area.

5 Undertake annual planning and reporting on management activities.

Annual operational plan

- 5.1 Develop an annual operational plan for the activities planned for the coming year to help achieve the objectives. This operational plan should include, but is not limited to:
- a) setting operational areas and annual ~~herd management targets and focus areas, including desirable herd composition and specific locations within the Sika Area~~ control targets, including the sex ratio of sika and specific locations within the Sika Area for control;
 - b) outlining ~~methods herd management activities~~ to achieve ~~annual herd management targets, such as recreational hunting, herd management hunts and professional control operations;~~
 - c) providing opportunities for the carcass recovery of venison associated with ~~control herd management~~ operations;
 - d) setting the annual sika hunting process, including the issuing of authorisations and any key dates;
 - e) identifying any other planned work or initiatives; and
 - f) identifying parties or entities responsible for management activities and related timeframes.

Annual report

- 5.2 Prepare and publish an annual report detailing the activities undertaken in the previous year, including, but not limited to:
- a) overall herd management ~~activities~~, including the number of sika ~~controlled harvested~~, the ~~control herd management~~ method(s) used, the areas where ~~control herd management~~ occurred and the ~~control herd management~~ effort;
 - b) results and outcomes of monitoring activities, such as ecological monitoring and hunter participation and satisfaction evaluations;
 - c) key metrics of ~~the contribution of hunters to herd~~ management, such as the number of authorisations issued and available information on the ages, locations, condition and quality of the sika taken;
 - d) sponsorships and commercial partnerships;
 - e) hunter training, education and community initiatives;
 - f) wider conservation activities supported; and
 - g) opportunities to improve management going forward.

1

- 5.3 ~~Include financial reporting in the annual report in relation to:~~
- ~~a) sika control and other conservation activities;~~
 - ~~b) overall expenditure and contributions by the Department and/or central government to manage the Sika Herd of Special Interest; and~~
 - ~~c) monitoring.~~
- 5.4 ~~Work with the Department when preparing the annual report prior to its finalisation and public release.~~
- 5.5.3 Present the annual report to Te Kotahitanga o Ngāti Tūwharetoa, Ngāti Whitikaupeka, Ngāti Tamakōpiri, Mana Ahuriri Trust, Hineuru Iwi Trust, Tamatea Pōkai Whenua, ~~the Tongariro Taupō Conservation Board and the East Coast Hawke's Bay Conservation Board~~, if requested.
-

57 Compliance, review and enforcement

Plan compliance and review

This Plan binds the Game Animal Council.

It must be reviewed at intervals of not more than 5 years, in accordance with section 19 of the Game Animal Council Act. Unless otherwise directed by the Minister for Hunting and Fishing, plan reviews are to be initiated early in the fourth year of a 5-year plan cycle. [Where monitoring and reporting indicate that changes to this plan are required to support the effective adaptive management of the herd, a targeted review may be initiated earlier.](#)

The review will consider annual reports, monitoring data and results, and relevant research as part of an assessment of whether the Plan's objectives and strategies are delivering the benefits expected to be gained by managing the sika herd for hunting purposes. The review will also address the overriding considerations outlined in section 1, [under the following circumstances:](#)

- [if one or more of the overriding considerations has undergone significant reform since the last assessment, or](#)
- [if major amendments are proposed to the HMP.](#)

[Minor or administrative changes to the HMP will not require a full assessment against the overriding considerations.](#)

Depending on the review findings, the Minister for Hunting and Fishing may determine that an amendment to this Plan is not required.

Where the Minister for Hunting and Fishing considers that the review findings warrant amendment of this Plan, any such amendments will be made following the process set out in the Game Animal Council Act. This includes the public notification of an amended Plan and an opportunity for interested parties to make submissions.

Sika Herd of Special Interest compliance and enforcement

Schedule 1 of the Game Animal Council Act sets out the compliance and enforcement framework that applies to the Sika Herd of Special Interest (if designated).

The Director-General of the Department may appoint and remove enforcement officers and honorary enforcement officers. Officers have the power to prevent or stop offending, require personal details, search, stop any activity, and seize any animal, animal product or thing that provides evidence that an offence has been committed.

A person who hunts or kills any animal in a designated area for a herd of special interest without the appropriate authorisation, licence or permit is liable on conviction to a fine not exceeding \$5,000.¹¹

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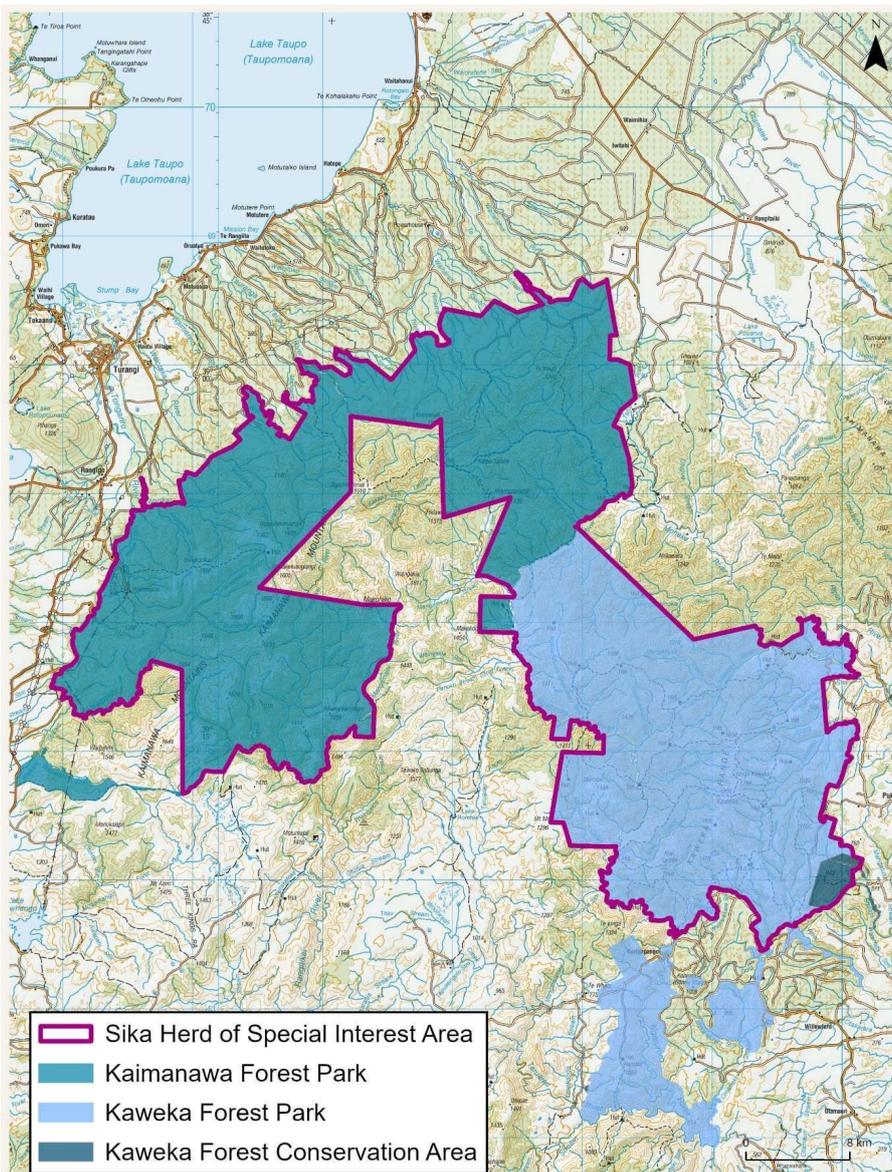
¹¹ [Game Animal Council Act 2013, section 30\(1\).](#)

¹²~~Game Animal Council Act 2013, section 30(1).~~

68 Appendices

Appendix 1: Maps

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Map 1: Sika Herd of Special Interest Area

Appendix 2: Glossary

Authorisation

Collective term for types of approvals (whether permits or otherwise) issued by the Minister for Hunting and Fishing under section 18 of the Game Animal Council Act 2013 [or issued by the Game Animal Council where this power is delegated to them by the Minister under section 20 of the Game Animal Council Act 2013](#).

Community

Any individual or group (whether statutory or non-statutory, formal or informal, commercial or non-commercial) with an interest in a particular [conservation issue of relevance to the HQSI](#).

Conservation board

An independent body established under section 6L of the Conservation Act 1987. The primary functions and powers of conservation boards are set out in sections 6M and 6N of the Conservation Act and section 30 of the National Parks Act 1980. Their functions include advising the New Zealand Conservation Authority or Director-General of the Department of Conservation on conservation matters of importance in their area. They also have an important conservation advocacy role. The relevant conservation boards for this Plan are the Tongariro Tāupo and East Coast Hawke's Bay Conservation Boards.

Control management target

~~A target number of deer to be removed from the Sika Area via recreational hunting, commercial hunting and professional control operations on an annual basis, as set out in an annual operation plan.~~

Herd management activity

~~Herd management activities include any activity that manipulates the demographics of the herd including number and structure. It can include recreational hunting, commercial hunting, and professional herd management operations that are provided for in this plan.~~

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Herd management hunt

Coordinated hunting activity facilitated by an entity empowered to undertake management activities for the Sika Herd of Special Interest, with hunting effort generally being undertaken on a voluntary (non-commercial and non-professional) basis. The main benefits are data collection and hunter education. Herd management hunts can also contribute to managing animal populations in some circumstances.

Herd management target

~~A target number of deer to be removed from the Sika Area via herd management on an annual basis, as set out in an annual operation plan.~~

Herd of special interest

A species of game animal in a specified area of public conservation land that the responsible Minister has, in accordance with the Game Animal Council Act 2013, formally designated to be managed for hunting purposes while ensuring that conservation values continue to be protected.

Indigenous flora

Plants that have established in New Zealand without the assistance of humans, vehicles or aircraft. This includes species that are unique to New Zealand, as well as those that may be found elsewhere in the world.

Minister for Hunting and Fishing

The Minister responsible for the Game Animal Council Act 2013.

Professional ~~control herd management~~ operation

Activities to search for and shoot ~~wild game~~ animals as a non-recreational and non-commercial activity specifically to help achieve ~~control herd management~~ targets. Professional ~~control herd management~~ operations ~~generally do not may~~ involve recovery of the animals or any parts of the animals. Professional ~~control herd management~~ operations may selectively target sika based on the sex and condition of individual animals.

Recreational hunting

Hunting undertaken by recreationists where there is no commercial gain involved in the activity.

Sika Herd of Special Interest

Sika (*Cervus nippon*) occurring within the Sika Herd of Special Interest Area.

Sika Herd of Special Interest Area (Sika Area)

The area and parts of Kaimanawa Forest Park, Kaweka Forest Park and Kaweka Forest Conservation Area that are subject to the Gazette notice designating the Sika Herd of Special Interest, as shown on the map in **Appendix 1**.

Sustainable forest canopy

Replacement of the forest canopy within 40 years of natural canopy collapse. Natural canopy collapse refers to the end of the natural life cycle of canopy species (trees) or occasions where environmental factors such as wind, snowstorm damage, or fungal or insect attack cause large areas of canopy species to die.

Appendix C Principles of quality game animal management

To deliver genuine value to the environment, the community, and the economy, the Sika Herd of Special Interest HMP must be underpinned by internationally established principles of quality game animal management. A successful HMP moves beyond a pest-control paradigm and adopts a resource-management paradigm.

To this end, the HMP must align with the following core principles:

Nature is not static

The HMP must recognise nature as a dynamic system where sika co-exist with indigenous flora. Management should facilitate this relationship, valuing the herd for food sovereignty and economic resilience rather than pursuing unachievable static preservation goals.

Sustainability guides management

The HMP must prioritise future-focused sustainability, managing populations to utilise the full range of ecological and game values. This approach secures natural resources for future generations while ensuring ongoing benefits for the land, people, and economy.

Science is the foundation

The HMP must replace guesswork with hard evidence. Decisions need to be based on real data, such as population surveys and habitat assessments. Using science to guide action is the only way to ensure the plan delivers better conservation and community outcomes.

Adaptive management

The HMP requires strict adaptive management. Managers must monitor outcomes and adjust management approaches based on results rather than adhering to static plans. This agility is essential across the entire herd management system to effectively respond to changing social and environmental conditions.

Ethical stewardship

The HMP must align with the legal recognition of animals as sentient beings. Management and harvesting activities require a selective and humane approach that prioritises animal welfare. Ethical stewardship must drive all operational decisions within the plan.

Community engagement and shared responsibility

The HMP must empower the community to solve local challenges. Hunters, iwi, and landowners need to work together as partners. The manager's role is to facilitate this

collaboration, ensuring the plan benefits all stakeholders rather than imposing top-down directives.

Habitat protection

Healthy animals require healthy habitats. The HMP must recognise that valuing sika incentivises protecting the wider ecosystem. Management must safeguard forests and grasslands to create a direct link between managing herd quality and enhancing the ecosystems the herd falls within.

Monitoring and accountability

The HMP must mandate transparent reporting on ecological and herd health indicators to measure progress. Consistent accountability is essential to verify objectives are met and maintain community trust. Effective, sustainable management relies on this transparency to succeed.

Kārena Joyce-Paki

Submission Details

Eirwen Harris Mitchell

From: wapitiHOSIHMP
Sent: Thursday, 11 December 2025 9:06 am
To: sikaHOSIHMP
Subject: FW: Submission – Draft Wapiti & Sika Herd of Special Interest Management Plans

Categories: Green Category

From: Karen [s9(2)(a)]
Sent: Sunday, 7 December 2025 10:55 am
To: wapitiHOSIHMP <wapitihosihmp@doc.govt.nz>; James.MeagerMP [s9(2)(a)]; SikaHerdOfSpecialInterest@doc.govt.nz
Subject: Submission – Draft Wapiti & Sika Herd of Special Interest Management Plans

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

Kia Ora MP James Meager, and decision makers,

I do not support granting legal protection to introduced deer on public conservation land. Deer are an invasive browsing species. Their ongoing impacts the loss of native seedling regeneration, depletion of palatable species, soil disturbance, erosion, and reduced habitat for indigenous fauna continue to undermine the mauri and long-term survival of our taonga species.

Our conservation estate must remain true to its core purpose: to protect and restore native biodiversity first. We are in an extinction crisis, any decision that elevates an introduced species above indigenous species must be treated with extreme caution.

Under Te Tiriti o Waitangi and the Conservation Act, there is a clear duty to uphold kaitiakitanga and prioritise the health of te taiao. Mana whenua must have an authentic role in decision-making, guided by mātauranga Māori and science.

If these HOSI proposals proceed against public concern, the following conditions must be non-negotiable:

- Independent ecological monitoring led by neutral scientific experts and mana whenua
- Annual public reporting on ecosystem health, including vegetation recovery and deer impacts
- Five-year review cycles tied to measurable biodiversity improvement
- No restrictions on conservation pest-control operations
- Mandatory deer population reductions if ecological health continues to decline
- Automatic revocation of HOSI status if environmental targets are not achieved within five years

Protecting Aotearoa's unique ecosystems should never be compromised. Our native forests, species, and whenua deserve decisive action and prioritisation.

Ngā mihi nui,
Kārena Joyce-Paki
Te Tai Tokerau

Chris Keeling - Te Uru Kahika

Submission Details

Eirwen Harris Mitchell

From: Chris Keeling s9(2)(a)
Sent: Friday, 5 December 2025 3:44 pm
To: sikaHOSIHMP; wapitiHOSIHMP; Wild Animal Management
Cc: PatrickWhaley(Exetrnal); Steve Ruru; s9(2)(a) s9(2)(a) s9(2)(a)
s9(2)(a) s9(2)(a)
Subject: Te Uru Kahika submission on proposed HOSI
Attachments: Te Uru Kahika Submission on proposed HOSI 5 December 2025.pdf
Categories: Green Category

Some people who received this message don't often get email from s9(2)(a) [Learn why this is important](#)

Kia ora koutou,

Please find attached the Te Uru Kahika submission, made on behalf of regional and unitary councils of New Zealand. This submission provides a broader regional sector view across both proposed HOSI. If you have any question or clarifications, please reach out to the designated contact in the submission.

Ngā mihi nui,

Chris Keeling,
Te Uru Kahika, Biodiversity & Biosecurity

DEPARTMENT OF CONSERVATION
PO BOX 10420
WELLINGTON 6143
ATTENTION: HERDS OF SPECIAL INTEREST CONSULTATION
SUBMISSIONS
VIA EMAIL TO: WILDANIMALMANAGEMENT@DOC.GOVZ.NZ

5 DECEMBER 2025

Tēnā koutou katoa,

1. Te Uru Kahika is the collective voice of New Zealand's 16 regional and unitary councils. It is underpinned by an extensive network of subject-matter experts. Together, we fulfil a vital role in championing best practice, information sharing and collaboration across regional government. We also work with central government to deliver better outcomes for local people and their environment.
2. New Zealand faces increasing biosecurity risks and continues to battle the many established pests that impact our indigenous biodiversity, the primary production sector and communities. In addition to the significant risks to our economy, pests are having a dramatic impact on our environment, being a major driver of biodiversity loss.
3. We are aware that you have reached out to the individual regional councils associated with the two proposed Herds of Special Interest (HOSI) in Fiordland and the Kaimanawa Ranges. As statutory partners in the biosecurity system, we think it is useful for us to provide a broader sector view on these proposals. This submission draws on our collective expertise to present a perspective on behalf of regional government as a whole.
4. Individual regional and unitary councils may make separate submissions, reflecting their own local circumstances. Should our positions diverge on specific points, we respect the authority of councils to express their own views. Where differences arise between regions, we trust this supports you in understanding the complexity of the issues being considered.
5. This submission focuses on the draft management plans and other areas we see as important for the regional sector.

SUBMISSION POINTS

6. **We strongly support the intention to improve the management of wild animals.** Wild animal control has been a growing concern for both landowners and regional and unitary councils. Our communities have been very clear that they want action to reduce impacts on ecosystems and primary production from wild animals. We generally support all tools and programmes that seek to reduce wild animal populations on both public and private land, but we ultimately want to see a decrease in numbers.
7. **The draft management plans lack specific details about how the programmes will operate, which raises questions about whether they will deliver the intended outcomes.** There are several areas where we seek clarification, and we recommend the plans should be further developed to provide more information to cover these points.

8. Where do roles and responsibilities lie for each plan? It would be beneficial to clearly articulate who is responsible for what. At present, it is not clear who will lead the various aspects of the work: who makes decisions, who funds, who delivers management actions and who monitors progress. This will be particularly important for transparency and accountability.
9. We also strongly support the objective of collaboration with our iwi, hapū and Māori partners. Several Treaty settlement entities have rohe into the proposed HOSI areas and it is critical to ensure their involvement and buy-in at all stages of planning and operations.
10. How will each HOSI be funded? Maintaining and managing each HOSI will incur significant costs. It is not clear how delivery will be funded and, more importantly, how funding will be sustained long-term. Our communities will expect to see gains and sustainable, long-term funding is critical to achieve that outcome.
11. Who will undertake monitoring and reporting? We strongly support the intention to establish a framework for monitoring. This is crucial to understanding progress, what management activities are the most effective and supporting adaptive management. However, the monitoring regime needs to be robust, resourced and undertaken by a suitable qualified body, as well as an organisation independent from those delivering the management actions. Who will be responsible for this?
12. How will plan reviews be undertaken and by whom? Section 19 (6) of the Game Animal Council Act 2013 states that “Herd management plans must be reviewed at intervals of not more than 5 years” but fails to state what constitutes as a ‘review’. When undertaking a review, does this involve public consultation on whether a HOSI should remain in place? If not, what next triggers public consultation for a HOSI? If no process currently in place, we believe it should be mandatory every 10 years.
13. How will these plans work with adjacent private landowners? Some landowners adjacent to the proposed sika HOSI area are currently experiencing high sika numbers and are undertaking control. Effective control requires culling within the conservation estate. We suggest considering remapping the proposed HOSI area so that it is a minimum 500m from adjacent private land. If an adjacent landowner is having issues with high sika numbers coming out of the designated HOSI area onto their land, how will this issue be resolved? If they control sika on their boundary and an animal runs back into the HOSI area prior to dying, are they at risk of being prosecuted?
14. How will coordination with other necessary pest management operations be considered? For example, OSPRI will need to deploy 1080 in the Kaimanawa Range to control TB-infected possums. Is the HOSI plan likely to affect OSPRI's ability to do that?
- 15. More generally, we have several other concerns about these proposals:**
16. Opportunity cost – If DOC is focussed on the proposed HOSI and are required to fund implementation (partly or in whole), other issues remain across the conservation estate that may not receive attention. We are concerned that these proposals could divert attention, funding and resource away from other important work, particularly in and around target areas and regions.
17. For example, DOC makes substantial contributions to the nearby Kaimanawa/Kaweka wilding conifer control work and Ruahine deer management. We are concerned that

focussing on sika management may risk these or similar programmes of work, losing hectares of forest park elsewhere and losing the support of local landowners who are also contributing.

18. Communicating a contrary message for pest management – As we stated at the outset, our interest is seeing wild animal populations decrease in these areas to improve ecosystem condition and processes. We are concerned that this plan could deliver outcomes that run contrary to this by facilitating a sustained population of pest animals for recreational hunting in the long-term.

STATUS OF THIS SUBMISSION

19. This submission does not override the position taken by individual regional and unitary council submissions. Where an individual member council's submission is not aligned with this submission, the view of the member council on a particular point is confirmed as their position on that matter.
20. We would be happy to meet with you to talk through any of the points raised above. Contact should in the first instance be made with:

Patrick Whaley, Biomanagers

Te Uru Kahika

s9(2)(a)

21. Thank you again for the opportunity to submit on these plans.

Nāku iti noa, nā



Steve Ruru

**BIOMANAGEMENT LEAD – REGIONAL CHIEF EXECUTIVE OFFICERS GROUP
TE URU KAHIKA – REGIONAL AND UNITARY COUNCILS AOTEAROA**

Johan Kok

Submission Details

Submission on the Sika Herd of Special Interest Draft Herd Management Plan by Johan Kok

To: The Minister for Hunting and Fishing, and the Department of Conservation (DOC)

Subject: Submission on the Draft Herd Management Plan for the Proposed Sika Herd of Special Interest (HOSI)

Date: November 10, 2025

1. Introduction and Personal Context

I submit this feedback as an engaged New Zealander and outdoor enthusiast with a strong background in science and conservation. My professional qualifications and experience include a **B.Sc. with Honours in Entomology**, a **Master of Environmental Management**, and over **15 years working in Biosecurity**. I am a keen **bowhunter, trout fisher, birdwatcher, and entomologist** committed to environmental stewardship.

I am also the **father of two young boys**, and my family's connection to the land is deeply intertwined with valued introduced species. My household relies on wild venison and goat, which my sons and I hunt ourselves. We also fish for trout, observe native birds, forage, and conduct "bug hunts" together.

For my family and many other New Zealanders, the outdoor experience is an **integrated whole** that does not cleanly separate native from introduced species. Sika deer and other valued introduced species, like the trout we fish for, play a significant and irreplaceable role in our lives, one that has been deeply woven into the national identity for generations. These animals are a vital source of **sustainable, ethically-harvested subsistence food**—my fridge is filled with the wild venison and goat my two young boys and I hunt. This economic and cultural utility gives these species a profound and tangible **value equal to that of any native species**. We are also keen birdwatchers and entomologists who actively monitor the native environment and understand the impact of many introduced species on the environment, but the concept of seeing native species in isolation from the introduced does not exist for us. Our conservation ethic encompasses the entire landscape, recognising that species that have been present for over a century are now valued components of the **current and future environment**. We would never want to see these valued game animals removed from the landscape, and any management plan must acknowledge and protect this integrated value. Conservation in New Zealand should cease to be about trying to return the landscape to some

pre-human or pre-European point but instead focus on maintaining and enhancing what we currently have for future generations, taking the value of every species into account and managing accordingly.

I fully support the principle of the HOSI designation as a **significant step in the right direction** for modern, collaborative game animal management. However, this Draft Plan currently **fails to provide adequate security for recreational hunting opportunities** by neglecting to define clear social targets.

2. 🚨 Core Concern: Lack of a Defined Hunting Floor

My primary concern is the **asymmetry between the conservation and hunting objectives** in the Plan. The Plan defines conservation outcomes by a target (forest regeneration), but the hunting resource is only defined by animal quality, leaving it vulnerable to continuous reduction.

Objective Type	Current Plan Status	Concern
Ecological Target	Defined by outcome: Achieving seedling growth for sustainable forest regeneration.	This threshold could justify continuous population reduction toward effective eradication if monitoring shows deer impact continues even at very low numbers.
Hunting Target (Social Carrying Capacity)	Defined by quality: Hunting healthier animals, enhanced experience.	No defined minimum population level (a "hunting floor") is established to maintain a viable hunting resource.

The current structure creates a scenario where **ecological conservation is protected by a dynamic floor (that is yet to be defined), but the hunting resource is protected by nothing but the quality of remaining animals.** If the ecological requirements demand deer densities that make the population too scattered and difficult to find, the Plan provides no mechanism to stop further reduction.

It is useless to have a fat, healthy deer if the population is so low that a recreational

hunter, especially one with limited time, can never find one to hunt. The Plan must define a **minimum viable population density** that ensures a reasonable and sustainable **recreational hunting opportunity** (a measurable chance of success) to truly protect this valuable introduced species.

3. 🎯 Hunting Practices and The Need for Access Improvement

The Plan's focus on enhancing the hunting experience through improved animal health is appreciated, but the reality for many hunters is simpler and more practical:

- **Meat Hunter Focus:** As a meat hunter (like many other hunters), my priority is simply culling any deer or goat found, regardless of trophy quality, for eating. This practice is highly effective at reducing overall animal numbers and improving herd health.
 - **The Barrier to Effort:** The single biggest barrier to shooting more deer and contributing greater sustained effort is **difficulty with access** and lack of up-to-date information on where to find the animals. E.g. most of the DOC website information on hunting areas is completely out of date. Many don't even have the species that occur within the hunting block or any information on the numbers present, and also lack information on how to access the block. Many blocks don't have any legal public access.
 - The Draft Plan makes **no mention of improving hunter access to remote areas** (e.g., maintaining or upgrading tracks, trails, or remote huts). Increasing accessibility to remote zones for recreational hunters is a highly cost-effective method of increasing hunting effort, which directly supports the ecological goal of reducing overall population pressure in those areas.
-

4. 🗺️ Recommendations for Amendment

To balance conservation outcomes with the mandate to manage the sika herd for hunting purposes, I recommend the following amendments to the final Herd Management Plan:

- **Define a Social Carrying Capacity (Hunting Floor):** The Plan must establish a **minimum sika deer population density** or an equivalent metric (e.g., minimum harvestable number per year) that is necessary to maintain a **sustainable recreational hunting opportunity**. This minimum must be protected from further professional control.
- **Improve Hunter Access and Effectiveness:** Develop and implement strategies to enhance hunter access in remote areas. This includes track maintenance, repairing remote

huts, establishing designated remote hunting zones, and exploring options for subsidised helicopter access for hunters instead of professional cullers. Additionally, provide hunters with current information on deer populations and locations to maximise their efforts. This will empower hunters and increase their participation in managing the sika herd.

- **Acknowledge Integrated Environmental Value:** The introduction should clearly acknowledge the cultural, recreational, and subsistence value of **all valued outdoor resources**, including introduced species like sika deer and trout, to a large proportion of the modern outdoor community, reinforcing the integrated nature of conservation for many New Zealanders.

I urge the Minister and DOC to use this opportunity to establish a genuinely balanced and innovative management model that protects both the environment and the valued cultural/recreational resource.

Johan Kok

Auckland, New Zealand

Shaun Lee

Submission Details

Eirwen Harris Mitchell

From: David Owen
Sent: Tuesday, 16 December 2025 9:34 am
To: sikaHOSIHMP; wapitiHOSIHMP
Subject: FW: Commission: CORM | JMC-1046: Strategic stewardship and the classification of deer in the conservation estate

Categories: Green Category

Hi Eirwen

Can you please log the below as a submission on both HMPs?

Ngā mihi,
David

David Owen

s9(2)(a)
s9(2)(a)
Phone: s9(2)(a)
www.doc.govt.nz



From: Shaun Lee
Sent: Saturday, 6 December 2025 7:13 AM
To: James Meager (MIN)
Subject: JMC-1046: Strategic stewardship and the classification of deer in the conservation estate

Kia ora James,

I am writing to you regarding the proposal to accord deer a level of protection within our conservation areas. I urge you to pause and consider the intergenerational legacy of this decision.

As a Minister, you are currently the steward of our nation's natural capital. The decisions made today regarding the legal status of introduced species will determine the health of our environment for decades to come. We must look to the past to ensure we do not repeat historical errors. Just as the introduction of stoats is now viewed as a catastrophic mistake despite the intentions of the time, legislating protection for browsing pests runs the risk of being remembered as a similarly devastating turning point for our biodiversity.

True conservation relies on baselines. If you visit places like Chalky Island, you witness a control site for what Fiordland is biologically meant to be. The contrast between that abundant ecosystem and the deer-browsed mainland is a stark, data-driven demonstration of the degradation caused by these animals.

When the understory is stripped away, we are not just losing plants; we are compromising the forest's structural integrity. This leads to the "grey ghost" phenomenon we see in Fiordland—where drying winds penetrate the forest floor, stressing canopy trees to the point of collapse.

The Carbon Implication Beyond biodiversity, this is a matter of climate resilience. Healthy, regenerating native forests are New Zealand's most effective carbon sinks. **Research indicates that high populations of ungulates (deer and goats) significantly reduce a forest's carbon sequestration capacity by consuming the seedling layer that replaces dying canopy trees.** By protecting deer, we are effectively legislating against our own climate goals.

Supporting the Hunting Community Supporting our hunting culture and protecting our environment need not be mutually exclusive. However, designating a pest species as a protected resource is not the answer. Effective management looks like investing in access, infrastructure (such as huts), and resources that empower hunters to effectively manage populations—including hinds—to ensure herd health and forest regeneration.

I ask that you prioritize evidence and long-term value over short-term pressures. Please do not lock our conservation estate into a cycle of decline. I urge you to reject the protection of deer and instead focus on a legacy of restoration and prudent environmental management.

Ngā mihi

s9(2)(a)

stet.co.nz | mostnewzealand.com | reviveourgulf.org.nz | nztracker.org | seafloor.nz

Sharon Mariu - East Taupō Lands Trust

Submission Details

Eirwen Harris Mitchell

From: David Owen
Sent: Monday, 8 December 2025 10:55 am
To: sikaHOSIHMP
Cc: Dave Carlton
Subject: FW: Sika Herd of Special Interest Submission
Attachments: 251205_EAS_HOSI_Proposal_Submission.pdf

Categories: Green Category

Hi Team

Please see **attached** and below submission.

This has come in via the Minister's office – but still needs to be processed via the usual triage system of uploading from the sikaHOSIHMP inbox and coding in Keyplan etc.

Ngā mihi,
David

From: Mike Perry [REDACTED]
Sent: Monday, 8 December 2025 10:51 am
To: David Owen [REDACTED]; Dave Carlton [REDACTED]
Subject: FW: Sika Herd of Special Interest Submission

From: Megan Robinson [REDACTED] >
Sent: Monday, 8 December 2025 10:49 am
To: Mike Perry [REDACTED]
Cc: Dave Carlton [REDACTED]
Subject: Sika Herd of Special Interest Submission

Hi Mike,

As discussed, forwarding this submission through.

Many thanks,
Megan



Megan Robinson

[REDACTED] Office of Hon James Meager

Minister for the South Island
Minister for Hunting and Fishing
Minister for Youth
Associate Minister of Transport

Phone: [REDACTED]
Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

From: James Meager (MIN) [s9(2)(a)] >
Sent: Friday, 5 December 2025 11:51 AM
To: [s9(2)(a)]
Subject: Sika Herd of Special Interest Submission

Good morning Sharon,

On behalf of Hon James Meager, thank you for your email and submission to the Minister.

Kind regards,



Makona Pokoati [s9(2)(a)]
Office of Hon James Meager

P: [s9(2)(a)]

E: [s9(2)(a)]

M: Private Bag 18041, Parliament Buildings, Wellington 6160, New Zealand

Authorised by Hon James Meager, Wellington

From: Operations - East Taupo Lands Trust [s9(2)(a)]
Sent: Friday, 5 December 2025 11:31 AM
To: James Meager (MIN) [s9(2)(a)]
Subject: Sika Herd of Special Interest Submission

Kia ora Jake,

On behalf of East Taupō Lands Trust, please find attached a submission regarding the Sika Herd of Special Interest.

Ngā mihi

Sharon Mariu, Operations Manager

East Taupo Lands Trust, M: [s9(2)(a)]

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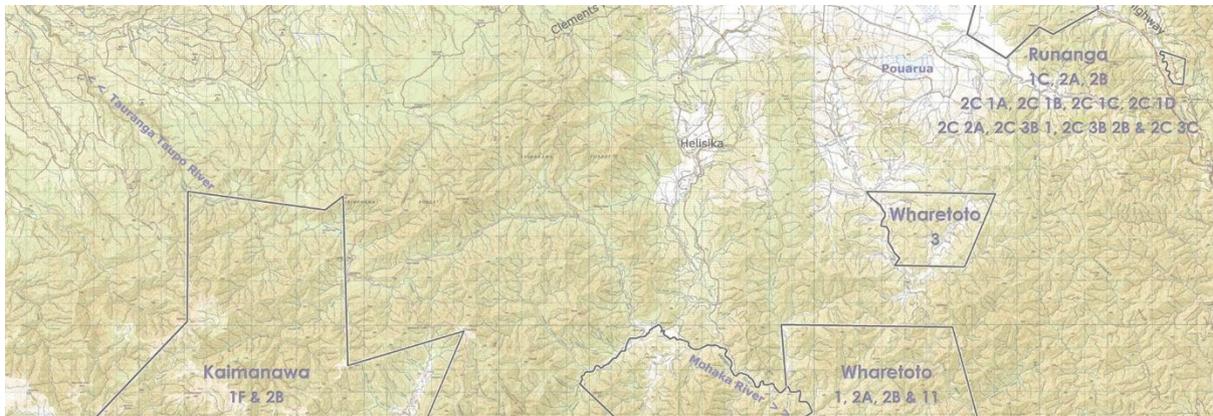
Sika HOSI proposal submission – East Taupō Lands Trust

1. Background

East Taupō Lands Trust administers 30,270 hectares of land to the southeast of Taupō. The total land holding is made up of 21 individual land blocks, and there are over 17,000 Trust owners. The Trust is governed by a maximum of 5 trustees elected by owners for a term of 6 years.

The majority of the land is subject to an Air Access Licence for Hunting and Fishing. However, the Trust is also actively involved in the honey industry and has a native plant nursery and farm development based on the Runanga blocks.

East Taupō Lands Trust Charitable Trust is funded by East Taupō Lands Trust. Its purpose is to distribute grants and benefits to Trust owners and their descendants.



2. Introduction

East Taupō Lands Trust welcomes the opportunity to provide feedback on the Draft Herd Management Plan for the proposed designation of sika deer as a Herd of Special Interest (HOSI) in the Kaimanawa and Kaweka Forest Parks.

Following careful consideration of the proposal and discussions to date, the Trust does not support the designation of sika as a Herd of Special Interest.

Our assessment has identified significant concerns relating to tangata whenua leadership, evidence quality, cross-boundary impacts, and the protection of Māori landowner rights. For these reasons, the Trust considers the proposal premature and unsuitable in its current form.

3. Summary of Position

The Trust opposes the HOSI proposal due to:

- insufficient tangata whenua leadership in both the design and governance of the proposal
- ecological claims that lack adequate supporting evidence
- material risks to neighbouring Māori land blocks, including potential displacement of deer



Sika HOSI proposal submission – East Taupō Lands Trust

- governance arrangements that lack independence and clarity, particularly regarding the DOC–Sika Foundation relationship
- potential impacts on established hunting operations and related commercial activities
- the absence of clear protections for Māori landowners
- unresolved implementation, monitoring, and resourcing issues.

The Trust considers that these collective issues make the proposal inconsistent with our role as kaitiaki and our obligation to safeguard Trust land and its operations.

4. Key Concerns

4.1. Tangata Whenua Leadership and Treaty Alignment

The Trust is concerned that tangata whenua have not been positioned as genuine partners in the development of the proposal. Given the significance of the affected area and its boundaries with multiple Māori land blocks, a Treaty-consistent process should involve:

- Māori landowners and iwi authorities shaping the kaupapa from the outset
- decision-making authority aligned with mana whenua roles and responsibilities
- governance structures that preserve the direct Crown–iwi Treaty relationship.

The proposal, as drafted, risks relegating tangata whenua to an advisory role while ceding operational influence on non-Treaty entities. This is not acceptable.

4.2. Insufficient Ecological Evidence

The proposal attributes forest canopy decline and ecosystem stress primarily to sika deer without:

- presenting clear, peer-reviewed evidence
- distinguishing deer impacts from those of possums, goats, climate variation, or historic pressures
- specifying monitoring methods, thresholds, or decision-making triggers
- providing transparent data for tangata whenua to consider.

A management framework of this scale must be underpinned by robust ecological science. The current evidence base is incomplete and cannot reasonably support the proposed designation.

4.3. Cross-Boundary Risks to Māori Land

A large portion of the sika range lies outside public conservation land. The Trust is particularly concerned about:

- displacement of deer from within the HOSI area onto adjacent Māori land blocks
- increased browsing pressure and ecological impacts on private land
- unclear expectations around coordination with Māori landowners
- the potential for indirect obligations to emerge for non-DOC landowners



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- the absence of mitigation, resourcing, or support mechanisms.

These issues introduce unacceptable risks to Trust land and the interests of our 17,000 owners.

4.4. Potential Use of Aerial 1080

The Trust understands that aerial 1080 remains a possible tool if population targets are not met. The Trust strongly opposes its use in proximity to Trust land or waterways due to:

- environmental risk
- cultural and Māori values concern
- impacts on honey operations
- market and reputational risks
- long-term uncertainties regarding ecosystem effects.

Any framework that contemplates aerial 1080 presents risks incompatible with Trust responsibilities.

4.5. Governance and Independence Issues

The Trust notes the unusually close operational relationship between DOC and the Sika Foundation in shaping the proposal. Effective governance must ensure:

- independence
- transparent decision-making
- representation that appropriately reflects tangata whenua interests
- accountability grounded in Treaty obligations.

The current governance arrangements raise concerns regarding balance, independence, and the potential for conflicts of interest.

4.6. Impacts on Established Trust Operations

The Trust manages a range of activities that rely on stable, predictable access and wildlife management settings, including:

- commercial and recreational hunting
- honey production
- nursery operations
- land development.

The proposal introduces risks such as:

- potential interference with established hunting systems
- external pressure on how deer are managed on Trust lands
- impacts on commercial operations linked to environmental conditions
- uncertainty for long-term land-use planning.

The Trust cannot support a proposal that risks disrupting these important activities.



Sika HOSI proposal submission – East Taupō Lands Trust

4.7. Protection of Landowner Rights

The Trust affirms the following principles, which must be upheld unequivocally:

- No access to Trust lands will occur without explicit Trust permission.
- All decisions relating to wildlife, land, and waterways on Trust blocks rest exclusively with the Trust.
- No element of the HOSI proposal may impose obligations—direct or indirect—on Māori landowners.
- Any activity with potential to affect Trust land must be subject to Trust approval.

These rights are fundamental and must be protected in any future discussions.

4.8. Implementation, Resourcing, and Practical Issues

The proposal does not address several foundational implementation matters, including:

- how monitoring will be resourced
- how data will be shared with tangata whenua
- how neighbouring Māori landowners will be supported if impacts occur
- how conflicts between entities will be managed
- how the integrity of Māori management practices will be preserved.

Until these operational elements are resolved, the proposal cannot be confidently assessed or supported.

5. Future Engagement

The Trust remains open to further dialogue with DOC and relevant parties, provided:

- tangata whenua leadership is central to the process
- the Crown–iwi Treaty relationship is upheld in full
- the rights and autonomy of Māori landowners are protected
- future discussions are not predicated on the current proposal in its present form.

6. Conclusion

For the reasons outlined above, East Taupō Lands Trust does not support the designation of sika deer as a Herd of Special Interest.

The Trust respectfully requests that DOC and the Minister reconsider the proposal and ensure that any future process:

- embeds tangata whenua leadership from the beginning
- is supported by robust, transparent ecological evidence
- protects Māori landowner rights and interests
- establishes governance that is independent, balanced, and Treaty-consistent



Sika HOSI proposal submission – East Taupō Lands Trust

- fully accounts for cross-boundary effects and provides appropriate safeguards.

Only under such conditions can future engagement occur in a way that upholds kaitiakitanga and the long-term wellbeing of the whenua and its owners.