

# Sika Herd Management Plan Submissions

## Record

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# Reece Martin - Owhaoko B & D Trust

Submission Details

## Eirwen Harris Mitchell

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**From:** s9(2)(a)  
**Sent:** Monday, 8 December 2025 4:13 pm  
**To:** sikaHOSIHMP; Dave Carlton; Moana Smith-Dunlop  
**Cc:** Info - Owhaoko  
**Subject:** Sika HOSI proposal submission - Owhaoko B&D Trust  
**Attachments:** Owhaoko B&D Trust Sika HOSI proposal submission.pdf

**Categories:** Green Category

Tēnā koutou

please find attached a submission from the Owhaoko B&D Trust on the Sika HOSI proposal.

Any queries relating to this submission, or additional correspondence on this kaupapa, should be sent to the following contacts on behalf of the Trust:

- Owhaoko B & D Trust: s9(2)(a)
- Reece Martin: s9(2)(a)

Ngā mihi  
Reece  
Trustee - Owhaoko B & D Trust  
s9(2)(a)

**Owhaoko B&D Trust**

PO Box 7233, Hamilton

0800 274 374

<https://www.owhaoko.co.nz>

s9(2)(a)

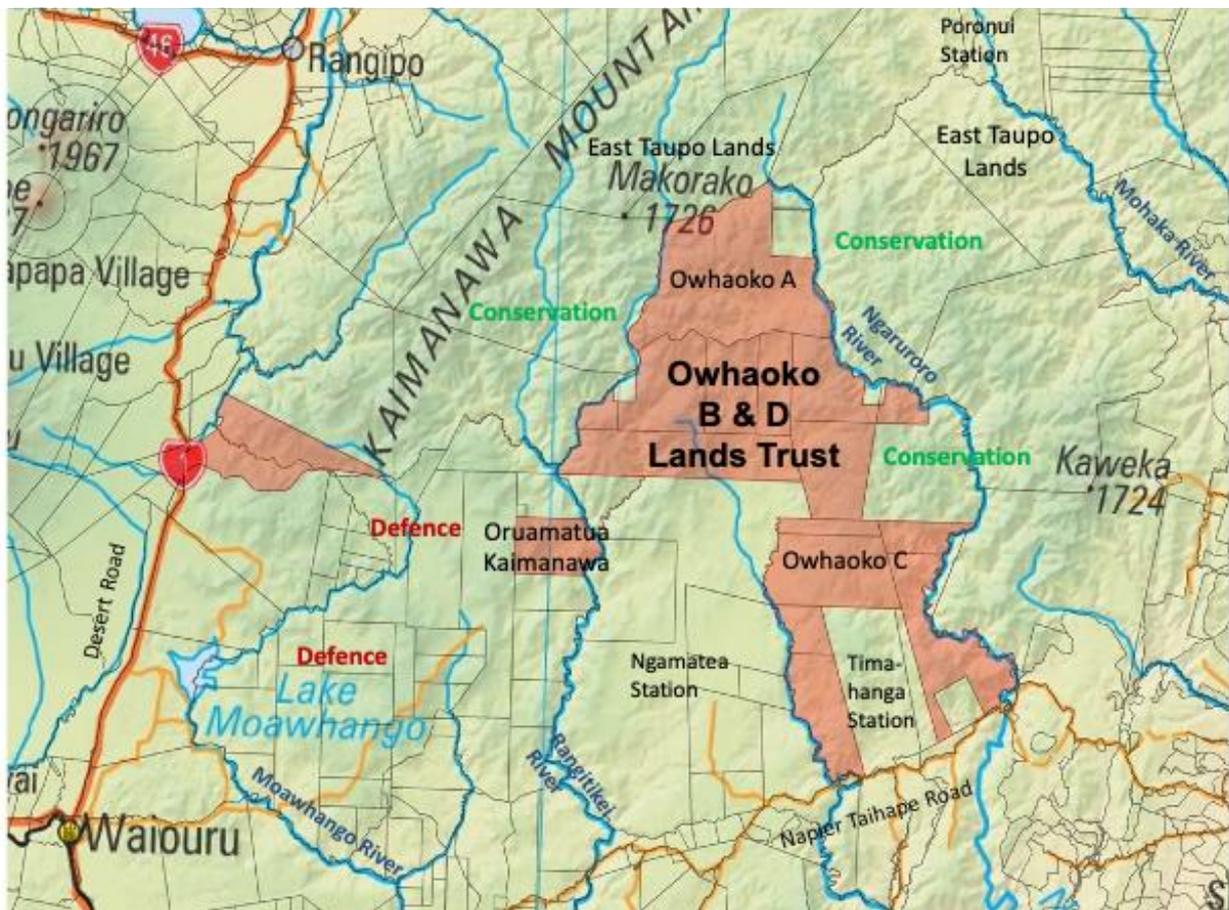
**Department of Conservation**

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

Tēnā koutou

**Sika draft HOSI Plan submission – Owhaoko B&D Trust**

This submission is tendered on behalf of the Owhaoko B&D Trust (the “Trust”). The Trust administers seven land blocks forming part of the Mōkai Pātea lands which belong to Ngāti Tamakōpiri, Ngāti Whitikaupeka and Ngāti Whiti Tama. The total area of the blocks is around 14,000 hectares.



Location of the Owhaoko B&D Trust lands

The whenua is landlocked and is surrounded by Māori land (Owhaoko A Blocks) to the north, the Rangitikei River and Kaimanawa Forest Park to the west, the Ngaruroro River and Kaweka Forest Park to the east, and Ngamatea Station and Owhaoko C whenua to the south.

## Introduction

The Trust has significant interest in the Sika Herd of Special Interest (HOSI) draft Herd Management Plan (the “Plan”), as the Department of Conservation (DoC) whenua covered in the proposal borders our eastern and western boundaries.<sup>1</sup> In addition, the Trust shares similar objectives to those highlighted in the Plan around better understanding and managing the Sika herd to protect our whenua, ngahere, and our taonga species.

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

- there is coordination, support, and alignment with other landowners across the broader landscape
- neighbouring landowners/managers aren’t going to be forced into complying with the objectives and requirements of the Plan/regime in the future
- that the new management regime/entity for the Plan does not complicate or impede DoC’s Treaty obligations and relationships with Iwi/hapū.

## Discussion

Below is our feedback on the key issues of interest:

Section	Comments
<b>General feedback</b>	<p>In general, the objectives/strategies in the HOSI plan align with the long term objectives of the Trust as we are keen to do similar and conservation/ecological management work on our whenua.</p> <p>We are also keen to better understand how we can better manage the Sika herd on our whenua. The Trust has direct interests in the management of the Sika herd, as we have a hunting operation on our blocks which is managed through Helisika.</p> <p>The intent of the Plan is positive from a Trust perspective, but there are questions around how things will work in practice. We have questions around:</p> <ul style="list-style-type: none"> <li>• How can the Sika herd be successfully managed if the work is not coordinated and aligned with neighbouring landowners and managers at a broader landscape scale?</li> <li>• What assistance and resources are available for neighbouring landowners to do similar work so that the objectives of the HOSI plan/work can be achieved?</li> </ul> <p>Although the Trust would support working on this issue at a landscape scale, this would require DoC to support and resource our Trust. In the long-term, we would also be concerned if there were moves to force neighbouring landowners into undertaking any Sika herd management activities as part of the HOSI plan (or other related initiatives).</p>

<sup>1</sup> See <https://www.doc.govt.nz/contentassets/d2ab98d7d3764733bf2033c61de29b55/sika-herd-of-special-interest-draft-herd-management-plan.pdf>

	<p>As a Trust that administers multiple land-locked Māori land blocks, our options for resourcing the scale of work required are severely restricted. The costs of undertaking any work on our remote and land-locked blocks are also very costly. Therefore, additional Trust efforts to support the work of the HOSI plan must be supported and resourced by DoC.</p> <p><b>Overarching iwi/hapū concerns</b></p> <p>The Trust also share the concerns of our parent iwi/rūnanga – and other iwi across the rohe - that the introduction of a new management regime/entity to manage the proposed Sika HOSI plan will complicate – and potentially impede - the Crown’s Treaty obligations and DoC/Iwi/Hapu relationships at a local level.</p> <p>The Treaty obligations and relationships between iwi and DoC must be maintained and enhanced. From an iwi perspective, the fundamental obligations and relationships need to be maintained between DoC and our iwi, and the Sika Foundation and Game Animal Council cannot replace this direct Crown obligation.</p>
<p><b>Draft HOSI plan feedback</b></p>	
<p>HOSI objectives (page 13 of draft Plan)</p>	<p><i>Sika are managed in a manner that allows for the maintenance of forest ecosystem processes, including canopy regeneration, and protects threatened species and their habitats.</i></p> <ul style="list-style-type: none"> <li>• Support this objective – this aligns with Trust objectives, and the mahi the Trust are doing around whenua/forest regeneration on Owhaoko B&amp;D whenua.</li> </ul> <p><i>The sika hunting experience is enhanced while contributing to overall management and regeneration of the Sika Area.</i></p> <ul style="list-style-type: none"> <li>• Support this objective – as above. This mahi will also benefit the hunting opportunities undertaken on our Owhaoko B&amp;D whenua.</li> </ul> <p><i>Seek to generate in kind support, and revenue through partnerships and sponsorships, to contribute to the cost of delivering this Plan.</i></p> <ul style="list-style-type: none"> <li>• Neutral – agree that additional funding needs to be found for this work, as DoC has scarce funding for current work.</li> <li>• The Trust are keen to understand what opportunities are available for supporting and resourcing neighbouring land blocks like our Trust.</li> </ul> <p><i>Engage the hunting community in the management of sika and the Sika Area so the community provide support for local conservation and social initiatives.</i></p> <ul style="list-style-type: none"> <li>• Neutral – agree with the intent of getting the community involved, including entities like our Trust. However, this should not detract from Treaty obligations under the Conservation Act to engage and partner with iwi/hapū.</li> <li>• This also includes Trust’s representing iwi/hapū interests like ourselves. Engagement to date has been lacking.</li> </ul> <p><i>Relationships between Ngāti Tūwharetoa, Ngāti Whitikaupeka, Ngāti Tamakōpiri, Mana Ahuriri Trust, Hineuru Iwi Trust, Tamatea Pōkai Whenua, the Department, the Game Animal Council and the Sika Foundation are</i></p>

	<p><i>strengthened, and opportunities for tangata whenua to be involved and participate in the management of sika are increased.</i></p> <ul style="list-style-type: none"> <li>• Support – critical that this mahi is supported by iwi/hapū and affected Māori land Trusts like the Owhaoko B &amp; D Trust.</li> <li>• We are keen to understand how this relationship strengthening will occur in practice to ensure that the fundamental DoC/iwi relationship doesn't become lost in any new arrangement.</li> <li>• From an iwi perspective, the fundamental obligations and relationships need to be maintained between DoC and iwi, and the Sika Foundation or Game Animal Council cannot replace this.</li> <li>• From a Trust perspective we would also see the core relationship as being with DoC as the neighbouring landowner, rather than the Sika Foundation or Game Animal Council.</li> </ul> <p><i>Knowledge and understanding of the dynamics between sika and indigenous species and ecosystems are improved.</i></p> <ul style="list-style-type: none"> <li>• Support – the Trust are keen to learn and be informed of any research undertaken for this objective. This is likely to be useful for helping our Trust understand how we can improve management of our ngahere, taonga species, and the sika herd on our whenua.</li> </ul> <p><i>Monitoring enables adaptive management and demonstrates whether the management of sika is achieving the objectives of this Plan.</i></p> <ul style="list-style-type: none"> <li>• Support – the Trust are keen to be kept informed of monitoring results too, and whether there are opportunities for support/resourcing of monitoring initiatives on Owhaoko B&amp;D whenua.</li> </ul> <p><i>Research supports and enhances the management of sika and the Sika Area.</i></p> <ul style="list-style-type: none"> <li>• Support – the Trust are keen to understand research that will assist with restoration initiatives on our whenua and how the Trust can better manage its Sika deer population.</li> </ul> <p><i>Public reporting provides information on whether the Plan is achieving the Objectives.</i></p> <p>Neutral.</p>
<p><b>Strategies (pages 13 – 16)</b></p>	<p><i>Undertake monitoring and research to support management and decision making.</i></p> <ul style="list-style-type: none"> <li>• Support this strategy as the Trust are also keen to understand what we can do on our whenua to enhance and support our conservation &amp; ecological management goals.</li> <li>• The Trust are keen to understand what funding/resourcing is available for research/monitoring on our Owhaoko B&amp;D whenua.</li> </ul> <p><i>Work closely with iwi and hapū to manage sika</i></p> <ul style="list-style-type: none"> <li>• Support this strategy but note that the primary Crown relationship for our two iwi – Ngāti Tamakōpiri and Ngāti Whitikaupeka – should be direct with DoC as the Treaty partner (not the Sika Foundation or Game Animal Council).</li> </ul>

	<ul style="list-style-type: none"> <li>As a Trust, we are primarily focussed around on-the-ground management initiatives so would have a management relationship with DoC in how the proposed work and HOSI plan is implemented.</li> </ul> <p><i>Undertake annual planning and reporting on management activities</i></p> <ul style="list-style-type: none"> <li>Support - the Trust are keen to be kept updated on progress with implementing the HOSI plan.</li> <li>Would expect that our two iwi – Ngāti Tamakōpiri and Ngāti Whitikaupeka – are kept updated too via the close working relationship mentioned above.</li> <li>In line with the strategy above - <i>to work closely with iwi and hapū to manage sika</i> - we would expect that there is reporting on this in the annual plan to ensure that there is clear accountability around how this is occurring.</li> </ul>
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Any queries relating to this submission, or additional correspondence on this kaupapa, should be sent to the following contacts on behalf of the Trust:

- Owhaoko B & D Trust: s9(2)(a)
- Reece Martin – Trustee, Owhaoko B & D Trust: s9(2)(a), s9(2)(a)

s9(2)(a)

## Submitter 115

Submission Details

I am voicing my dissent for the HOSI draft management plan(s), having read them I feel strongly that they do not place the conservation of our indigenous forests at heart, as such their value as conservation management tools is sorely compromised.

I don't see why the strategies outlined in the plan(s) are contingent on legal protection for introduced species, and New Zealand would do better to have a unified, well-resourced strategy to protect our forests and native species, they are our most irreplaceable treasure.

On first reading these drafts appear to be a win-win, with the ecological impacts of deer recognised, and a reduction strategy focussed on hinds poised to benefit both the forest and the hunting community.

As written, the draft management plans are chiefly concerned with improving the hunting experience, and much of their contents is devoted to describing how outcomes for both the commercial and recreational parts of the hunting community will improve, and how each can expect to see benefits and enjoy consultation.

It is reassuring to see that at least forest monitoring has been recommended as a method to quantify and record the effectiveness of this management strategy, however there is very little describing how these management plans will materially improve conservation outcomes. It appears that the reduction of hinds and foals required to increase the ratio of stags in the herd is being treated as a conservation outcome of its own right. Yet this reads more like a post-hoc justification of prioritising a non-native species in the legislation. There are no specific, time bounded goals for improving biodiversity anywhere in the plan(s).

Both the plans, and the recently passed bill allowing the implementation of these HOSI management plans undermine important checks on decision-making by going on to place this decision in the hands of a minister. At risk of reiterating ground that has been much gone over, I feel that such a move would undermine the purpose of the National Parks Act,

- *“they shall be preserved as far as possible in their natural state”*
- *“except where the Authority otherwise determines, the native plants and animals of the parks shall as far as possible be preserved and the introduced plants and animals shall as far as possible be exterminated”*

Wild Animal Control Act,

- *“An Act to make better provision for the control of harmful species of introduced wild animals”*

and conservation boards / NZCA – all of which serve the intent to protect indigenous biodiversity for the good of all New Zealanders. Our National Parks and Public

Conservation Land exist to protect nature and provide for public access, not provide for introduced species.

I feel that the objective set out to “*allow for the maintenance of natural biodiversity by restoring ecological processes*” is something of an afterthought and is in direct conflict with the reality of the effects of browsing ungulates in New Zealand. Deer even in small numbers have a major impact on recruitment in plant communities, comparatively few native plants are sufficiently unpalatable and suited to survive in an environment with browsers that use their olfactory sense to detect forage. As deer numbers increase they consequently browse out their own food and begin to run out of enough to eat and so lose condition. Hence the desire to improve the quality of animals, and therefore the hunting experience. It’s disappointing that there is not instead a similarly strong desire to improve the appalling ecological state of our forests and mountains, which has come about in large part at the hands (or rather mouths) of these introduced feral browsers. Likewise it is alarming that the only factor required for herds to become legally protected according to the draft plan(s) is that the animals be of “*special interest to hunters*”. This makes me feel left out of the conversation as an outdoors person and conservation worker. I belong to dedicated and passionate outdoor communities that have our values neglected by the ways that introduced species are managed, or rather not managed.

A similar type of management has failed before. Thar, the introduced Himalayan goat were supposed to be restricted in both the number of individuals and their range, in order to preserve the very delicate mountain ecosystems that they invade, and yet their numbers ballooned to around triple what they were meant to be before they began to be culled at great expense. What evidence is there that another failure in managing a species’ negative impacts will not occur this time?

A brief note on commercial activity, trophy hunting enterprises, and economic drivers. As a New Zealander I place ecological outcomes in our forests and mountains in the highest regard. Such economic considerations have no place in driving how we as a nation, and as outdoor communities manage biodiversity, and interact with nature, as is our right under law. In contrast, if we want to discuss economic factors it is important to remember that New Zealand’s native species and nature are the key draw for our tourism.

I find it deeply concerning that the Game Animal Council, Wapiti Foundation, Sika Foundation, Department of Conservation, and lawmakers would seek to introduce legislative change that protects invasive species that have hugely deleterious effects

on New Zealand's native ecosystems, the very systems that provide for our treasured native birds, the forests that draw international visitors and kiwi families alike, and make Aotearoa special. With continued browsing pressure from animals like deer, eventually the recruitment of canopy species will be so degenerated that we will begin to lose our mature forests altogether, this is already beginning to happen, a phenomenon specifically recognised in the Sika draft management plan.

I had some recent experiences in Fiordland, and in Te Tai Poutini, I am one of a growing number of New Zealanders that are seeing firsthand the current decadal increase in deer and goat numbers. Having tramped all around the country for many years, I have been surprised by the degree of browse, and abundance of deer and thar that I'm now seeing. I was stumbling across animals without even having to look and listen for them, huge mobs are becoming increasingly prevalent in the alpine. More and more often I'm seeing plants grazed down to bare sticks instead of just the palatable fresh growth, bark stripped from trunks and the erosion that follows on from this heavy browsing, particularly above the bushline. I'm not alone in my experiences, recent media coverage is highlighting the problems that an abundance of deer is causing, for both forests and farmers.

New Zealand has a history of recognising the damaging effects of browsing deer, and acting to remedy the situation. From the 1930s in the Landsborough valley up until the 1970s and 80s all across the country when commercial recovery began to get underway, government cullers worked tirelessly on the task of reducing deer numbers. Those state sponsored efforts have a longstanding place in the memory of outdoor communities in New Zealand and while their effectiveness could never match that of later helicopter assisted commercial harvest, they are reflective of both a government and a hunting community that was willing to openly recognise that introduced browsing species are damaging to the forest, and act decisively on conservation principles.

While perhaps well intentioned the HOSI plan(s) strike me as a wholly unsuitable solution to this problem. Working constructively with the communities that value these herds on ways to reduce populations of these animals should not be (and in the past, has not been) mutually exclusive with also recognising them as the astonishingly damaging non-native animals they are. It is frankly confusing as to why herds of special interest need to be designated in order to implement the management principles proposed. A reduction of hinds and consequent improvement in the quality of animals in the herd, consultation with hunters, targeted recovery and control operations in hard-to-reach areas, and balloting are all strategies that can be used without needing to give introduced species exemption from control efforts. These animals are under no threat of eradication, as the under resourced Department of Conservation is in no position to fulfil its obligation to exterminate

introduced plants and animals.

The draft HOSI management plan(s) identifies a group of New Zealanders that see Wapiti / North American Elk and Sika as “introduced species and so think that the animals should be removed”. I feel that the draft plan(s) is prematurely dismissive of this perspective and doesn’t give space to consider ways of managing deer that prioritise the things that really make the New Zealand outdoors unique and special - its indigenous species and the natural beauty of its landscapes, without adulteration. I feel strongly that introducing well intentioned legislation that nonetheless ultimately gives a status of legal protection to these damaging introduced species is a gross failure of our duty to nature, and to future New Zealanders. In my view, New Zealand would be better served by a unified strategy of well-resourced control across all land. Introduced species are, at best, slightly overbearing guests in our ngahere, and at worst pests that destroy indigenous ecologies. Allowing them to set the terms and be prioritised feels incomprehensible.

I really truly believe that Aotearoa’s natural intrinsic state of being is worth protecting, that our indigenous biodiversity is constantly under pressure, and that we would be best to do everything we can to alleviate those pressures so that this treasured biodiversity can flourish as much as it is able. That feels to me the most potent legacy in how we interact with our land and native species.

# Carlos McDonald

Submission Details

## Eirwen Harris Mitchell

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**From:** wapitiHOSIHMP  
**Sent:** Tuesday, 9 December 2025 11:33 am  
**To:** sikaHOSIHMP  
**Subject:** FW:

**Categories:** Orange Category, Green Category

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**From:** Carlos McDonald s9(2)(a)  
**Sent:** Monday, 8 December 2025 10:19 am  
**To:** wapitiHOSIHMP <wapitihosihmp@doc.govt.nz>  
**Subject:**

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

Hi I've been trying to make a online submission to the Fiordland Wapiti Hosi but am having issues with the page.

I just want to say that I fully support the Wapiti hosi along with the Sika hosi. The work these to organizations do for adaptive animal management in New Zealand is fantastic.

Thank's Carlos McDonald

# Don McErlich

Submission Details

## Eirwen Harris Mitchell

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**From:** wapitiHOSIHMP  
**Sent:** Tuesday, 9 December 2025 11:24 am  
**To:** sikaHOSIHMP  
**Subject:** FW: Wapiti and Sika HOSI management plan submission

**Categories:** Green Category, Orange Category

---

**From:** Don McErlich s9(2)(a)  
**Sent:** Friday, 5 December 2025 9:17 pm  
**To:** wapitiHOSIHMP <wapitihosihmp@doc.govt.nz>  
**Subject:** Wapiti and Sika HOSI management plan submission

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

Kia ora,

I'm sending in a email submission on the draft Wapiti and Sika Herd of Special Interest management plans, hopefully this is adequate.

### 1. Overall position

I support the plans in general, but some parts need tightening up so they're practical and reflect how these herds are actually managed.

### 2. Why these herds matter

These herds mean a lot to me and many others. They're a big part of our hunting heritage, they get people out into the bush, they support mental health and wellbeing, and they give families a reason to get outdoors and put food on the table.

Wapiti and Sika are unique, and the experience of hunting them in Fiordland and the Central North Island is something special.

### 3. Community-led management

The management plans should back hunter- and community-led management. Groups like the Fiordland Wapiti Foundation have already proven they know what they're doing, and the system works best when the people on the ground have real input and responsibility.

### 4. Funding

Funding needs to go directly to the group doing the work eg, the Fiordland Wapiti Foundation. Not through DOC, GAC, or any government body for discretionary distribution/allocation. Direct funding means less hassle and better results.

### 5. Financial reporting shouldn't be a requirement of the plan.

Keep it simple.

### 6. Operational plan

The operational plan should stay separate and flexible. It needs to be something the implementing group can adapt as needed, not locked into the main management plan.

This lets them innovate, try new techniques, and keep improving without being weighed down by bureaucracy.

#### 7. Monitoring

Monitoring is important, but it needs to be useful and efficient. It should measure actual impact on vegetation. It shouldn't be overly expensive or time-wasting. Pellet counts shouldn't be included, they're not accurate for measuring impact and don't add real value.

#### 8. Roles and responsibilities

Give tasks to the groups with the right experience.

The Fiordland Wapiti Foundation has already shown for years that they can deliver good results.

There also needs to be more clarity on whether HOSI sits under DOC or GAC.

#### 9. Tone of the plan

The plan should focus on management, not "control." Talking about "controlling" these herds is outdated and doesn't match what the HOSI system is meant to achieve.

#### Final thoughts

I support the plans, and I want to see Wapiti and Sika around for future generations. With the changes above, I think the plans will be far more practical and effective.

Thanks for the chance to submit.

Don McErlich

s9(2)(a)

# **Rick McGovern-Wilson - New Zealand Conservation Authority**

Submission Details

## Eirwen Harris Mitchell

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**From:** NZCA  
**Sent:** Tuesday, 9 December 2025 1:32 pm  
**To:** sikaHOSIHMP; wapitiHOSIHMP  
**Cc:** NZCA  
**Subject:** NZCA submission  
**Attachments:** NZCA submission - Fiordland Wapiti and Sika Herd Management Plans - Dec 2025 - DOC-10554193.docx

**Importance:** High

**Categories:** Green Category

Kia ora

Please find attached a submission on the draft Wapiti and Sika Herd Management Plans.

Apologies for being late – it has been written since we had the opportunity to discuss these with you at the NZCA meeting last week.

Given there was a degree of commonality between the two Plans, the Authority opted to write one submission that covered the common areas, and separate sections on each of the Wapiti and Sika Plans.

Ngā mihi  
Rick

**Dr Rick McGovern-Wilson**  
NZCA Executive Officer  
Governance and Government Services Unit | Public Affairs Group  
Department of Conservation—*Te Papa Atawhai*  
DDI: [REDACTED]  
E: [REDACTED]  
[www.doc.govt.nz/conservation-authority](http://www.doc.govt.nz/conservation-authority)

# CONSERVATION AUTHORITY

## TE POU ATAWHAI TAIAO O AOTEAROA

## Herds of Special Interest – Herd Management Plans for Wapiti and Sika

SUBMISSION FROM THE NEW ZEALAND CONSERVATION AUTHORITY

Date	8 December 2025
To	<a href="mailto:sikahosihmp@doc.govt.nz">sikahosihmp@doc.govt.nz</a>   <a href="mailto:wapitihosihmp@doc.govt.nz">wapitihosihmp@doc.govt.nz</a>
Name of organisation	New Zealand Conservation Authority
Contact Person	Dr Rick McGovern-Wilson, Executive Officer
Postal address	PO Box 10420, Wellington 6143
Telephone	s9(2)(a)
Email address	s9(2)(a)

### The Legislative Basis for the New Zealand Conservation Authority's submission

1. The New Zealand Conservation Authority / Te Pou Atawhai Taiao o Aotearoa (**Authority, NZCA**) was established under the Conservation Act 1987 (**Act**), with members appointed by the Minister of Conservation. It is an independent statutory body with a range of functions, but primarily acts as an independent conservation advisor to the Minister and the Director-General of Conservation.
2. The Authority has a role as an objective advocate on matters of national significance and interest in the conservation arena, and provides high-quality, independent advice to the Department of Conservation (**Department, DOC**) on its strategic direction and performance.
3. The Authority has a range of powers and functions under the Act, as well as under other conservation-related legislation. Under section 6C(2)(c) of the Act, the Authority has the power to “*advocate the interests of the Authority at any public forum or in any statutory planning process.*”
4. Following the logic of the above powers and functions, the Authority submits on the Draft Herd Management Plans for Fiordland Wapiti and Sika Herds of Special Interest.

### NZCA Submission

5. The Authority's submission is based on its analysis of:
  - Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan, and the accompanying Consultation Support Document, and
  - Sika Herd of Special Interest Draft Herd Management Plan, and the accompanying Consultation Support Document.

### Overarching matters

6. Noting there are commonalities between the two Herd Management Plans (**HMP**), the Authority provides the following general observations, insights, and comments.

### *Overall Objectives*

7. The Authority believes that there should be two clear outcomes that derive from the HMPs – preservation of biodiversity and the benefits to conservation should be highlighted as a priority along with ‘enhancing the hunters experience’. At present the outcomes are more strongly skewed to the hunting aspect, but they should be more purposeful on conservation outcomes and better reflect the hunters’ contribution to conservation efforts (which the Authority recognises).

### *Funding models*

8. Currently the Wapiti Area is managed by the Fiordland Wapiti Foundation who, since 2005, have established a strong funding model that enables them to undertake widescale conservation efforts – both within the Wapiti Area, and wider across Fiordland National Park.
9. The Authority is concerned that because DOC is not able to charge for hunting permits on public conservation land, including the area of the Sika Herd of Special Interest (**HOSI**), widescale ecological management, necessary for both forest regeneration and better conditioned sika deer, will only occur if there is direct funding for the work.

### *The development of National Parks and why they are important*

10. In 1887 Paramount Chief Horonuku Te Heuheu made an agreement that the Central North Island volcanoes would become a national park, which occurred in 1894. In the early 1900’s red deer were released to control introduced lupins sown on Tongariro for beauty purposes. Around the same time wapiti were released into Fiordland for hunting sport, and goats were present on Taranaki maunga.
11. Reaction to this promoted the idea National Parks should protect NZ species.
  1. Growth in conservation focus

Conservation issues were not a high priority in New Zealand in the first part of the 20th century, with two world wars and depression, most people were concerned with financial security, extraction rather than protection pervaded, the post WWII period saw economic growth and an outdoor recreation boom prompting conservationists to lobby for more National Parks.
  2. Separation of decision-making

This generated decades of public and political discourse that resulted in the separation of decision-making structures to address the former dilemma of balancing conservation against development to achieve greater accountability and effectiveness.

This saw a shift from managing forests for timber to preserving trees, the Department of Conservation was formed bringing under one department functions formerly managed by several government departments, e.g. Forestry Department, Lands & Survey and the Wildlife Service.
  3. National Park Act 1952

The National Park Act 1952 set up the National Park Authority and National Park Boards to provide guidance and policy, the Act emphasised that native plants & animals would be preserved, introduced species controlled or exterminated. The National Park Authority was strongly aligned to the departments of land, forestry and tourism with NGO representation, i.e. Forest & Bird, Federated Mountain Clubs, and the Royal Society of NZ.

4. National Park Act 1980

The 1960's debate over raising Lake Manapouri in Fiordland National Park the conservation topic became public for the first time. The National Park Act 1980 addressed some scientific and conservation concerns and added ecological systems to the list of features that merit National Park status.

5. The Conservation Act 1987

The Conservation Act 1987 was created to promote the conservation of NZ's natural and historic resources and includes the National Parks Act 1980 in its schedules. Section 4 of the Conservation Act states it must be so interpreted and administered as to give effect to the principles of the Treaty of Waitangi (Section 4).

In 1990, the National Park Authority and Park Boards were disestablished and the New Zealand Conservation Authority and Conservation Boards were established. Public right of access to national parks balanced with the need to protect plants, animals and natural features, with restrictions on buildings, roads, signs, vehicles, boat and air traffic.

- 1952 - 5 national parks (Tongariro, Mt Egmont, Fiordland, Arthurs Pass and Abel Tasman)
- 1965 - 10 national parks
- 2025 - 13 national Parks (3 in NI, 10 in SI). (Urewera delisted 2014)

*Role of the Conservation Authority*

12. The role of the Conservation Authority is to oversee the implementation of the National Parks Act 1980. The Authority oversaw the development of the General Policy for National Parks in 2005 and approves National Park Management Plans as and when the Department produces them.
13. The only references to the Authority, in either of the HMPs, are regarding the Conservation Boards' function to advise the Authority on conservation matters and a footnote for the General Policy for National Parks.

*Risks and mitigations*

14. Neither of the HMPs contain a section covering risks and mitigations, or measures for the objectives, to enable assessment of their viability or success.

*Consideration of alternatives*

15. Alternatives are not presented for addressing the identified issues, managing HOSI, or means of achieving the objectives.
16. Although the need for herd reduction is explained, and methods of herd reduction and control are described, why establishing HOSI is the preferred approach is not covered. There is no discussion or weighing up of alternatives, such as increasing funding and resources for existing measures with proven effectiveness.

*Monitoring and reporting*

17. Herd control assessments are referred to in the documents, but findings are not included to indicate whether the objective of creating a HOSI is achievable or affordable, or by whom, or what impact it would have on current control methods.
18. Although the HMPs talk to the importance of monitoring, research, and reporting in herd management, there is no suggestion of who would carry out the work, with what budget or oversight, and what actions would follow the reporting. For example, if analysis found

the objectives of HOSI (to sustainably restore biodiversity and improve herd quality) were not achieved or achievable, what processes for reviewing or revoking HOSI exist?

## Fiordland Wapiti HOSI draft herd management plan

### *Achievability of HOSI management, based on proposal*

19. It appears the level of herd reduction, aspired to for successful implementation of HOSI, will not be possible through only hunting efforts. The Game Animal Council has been outspoken in its opposition to other methods of control, especially poisons, maybe raising questions about how it would meet the requirements of the HMP, if given a delegation to manage HOSI.

*“An objective of the Fiordland National Park Management Plan 2007 (FNPMP) is to reduce, and control introduced animals (including Fiordland wapiti) by all available means to a level that allows for the regeneration of browsed indigenous flora” (p8).*

20. The HMP also notes “While extensive commercial venison recovery significantly reduced deer numbers in the 1970s to 1990s, market conditions have been increasingly unfavourable for commercial operations since then”.

### *Reflection of conservation objectives*

21. Despite having an objective to restore biodiversity, the HOSI programmes do not amount to intensive management, and the HMPs do not address this issue, as they are not drafted as long-term, adaptive plans (beyond a 5-year review). “Research indicates that regeneration is possible with intensive management, but this is generally slow” (p7).
22. The plan appears to rely on “hunters adopting a conservation mindset when hunting” when laying out how the HOSI management approach is intended to work:

*“Adoption of the Fiordland Wapiti Herd of Special Interest management approach is intended to encourage collective and concerted action for Fiordland wapiti management and the conservation of indigenous flora and fauna in the Wapiti Area. 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 Fiordland Wapiti Foundation and the Department to improve Fiordland wapiti management. This, in turn, is expected to expand the number of people contributing to conservation efforts more broadly. Working with hunters and other interested parties to increase understanding of the impacts Fiordland wapiti and other introduced species have on indigenous species can contribute to hunters adopting a conservation mindset when hunting.” (p9)*

23. The current key objective is worded so as to “allow for the maintenance” of biodiversity. In the Authority’s view this is providing for the status quo. Rather, the objective should be “provide for enhancement of biodiversity while enabling the hunting experience ... “.
24. Some simple adjustments of wording would help reflect this. Suggestions below. (additions underlined and deletions in strikethrough)

### **Wapiti draft HOSI**

#### *3 Objectives and strategies*

1. Fiordland wapiti are managed in a manner that ~~allows~~ provides for the ~~maintenance~~ improvement of natural biodiversity by restoring ecological processes and communities of browsed indigenous flora and preventing the loss of indigenous species from their current range.

- 2 The Fiordland wapiti hunting experience is enhanced, and the Fiordland wapiti herd produces high-quality bulls for balloted hunters to take annually during the bugle while contributing to overall management and regeneration of the Wapiti Area.

### *Responsibility*

25. The HMP suggests DOC is not the Monitor and the Authority is not needing to be consulted. The party responsible for management must be “Exploring the use of new monitoring methods, tools and technologies, and seeking the views of Papatipu Rūnanga, the Southland Conservation Board and the Department prior to their use in the Wapiti Area” (p12).
26. Although no delegation decision has been made, the document also suggests DOC is not the HOSI manager, by stating research findings must be presented in an Annual Report and the party must “Work with the Department when preparing the annual report prior to its finalisation and public release” and “Present the annual report to Papatipu Rūnanga and the Southland Conservation Board, if requested”.

### *Current role of the Authority as it relates to stakeholders and the region*

27. The Wapiti HMP includes, as its 5<sup>th</sup> objective (p11): “The Treaty partner relationship with Papatipu Rūnanga and Te Rūnanga o Ngāi Tahu is strengthened, and opportunities for Papatipu Rūnanga to be involved and participate in the management of Fiordland wapiti are increased”.
28. There have been issues raised by Ngāi Tahu whanau around the ballot system for Wapiti, and opportunities for whanau to undertake contemporary mahinga kai opportunities.

### *Potential impact of the proposed plan on the Authority's role*

29. A ‘Stewardship’ requirement is listed (p13, 3.10) which goes beyond the parameters of HOSI management: “Seek to provide a range of opportunities for the hunting community and other interested parties to contribute to wider conservation initiatives within the Wapiti Area, such as predator trapping and control programmes and the maintenance of historic huts and public recreation infrastructure”. This may cross into existing responsibilities of other parties.

### *Position of the Authority*

30. NZCA recognises and is deeply concerned by the fact that the control of deer in Fiordland National Park is not adequate, and this situation is having serious impacts on the biodiversity of the area. The activities of the Fiordland Wapiti Foundation have been providing a level of control that DOC has not delivered. The establishment of a HOSI in a National Park has raised a number of issues that are not fully addressed in the current proposal as noted in the points articulated above. A critical element is the Treaty relationship - and whether there is agreement by mana whenua for the establishment of a HOSI in Fiordland.

## **Sika HOSI draft herd management plan**

### *Achievability of HOSI management, based on proposal*

31. HMP details do not appear to support the goal. Although targeting hinds is reported to be the most effective control approach through hunting, the HMP notes “stags are hunters’ preferred target”. It is not made clear how this behaviour would be modified to meet the objective of reducing herd size (p10). Further, it is noted that stags have a wider grazing area – this suggests the intended predominantly male herd will be harder to control as it is more likely to move into private land, out of controlled areas (p11).

32. It is possible recreational hunting opportunities may be reduced by the introduction of limited permits (ballot system) for hunting HOSI, noting the number of hunters is attributed as a leading means of controlling herd size. Open hunting areas are proposed, but conditional on not negatively impacting hunters' safety or experience (p13). Any impact open areas would have on generating revenue, to recoup costs, is not discussed.

### *Reflection of conservation objectives*

33. The HMP contains very little detail to support its claim to promote conservation goals. For example:

*“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” (p11).*

34. The current key objective is worded so as to "allow for the maintenance" of biodiversity. In the Authority's view this is providing for the status quo. Rather, the objective should be "provide for enhancement of biodiversity while enabling the hunting experience ...".
35. Some simple adjustments of wording would help reflect this. Suggestions below. (additions underlined and deletions in strikethrough)

### **Sika draft HOSI**

#### *3 Objectives and strategies*

- 1 Sika are managed in a manner that ~~allows~~ provides for the ~~maintenance~~ improvement of forest ecosystem processes, including canopy regeneration, and protects threatened species and their habitats.
- 2 The sika hunting experience is enhanced while contributing to overall management and regeneration of the Sika Area.

### *Position of the Authority*

36. The Authority acknowledges that while there need to be new approaches to dealing with the destruction to forest health and biodiversity caused by deer, and that while the HOSI proposal presents a path forward, there are significant unanswered questions as noted in the points articulated above.

## **Overall comment**

37. The intended conservation outcomes are not prioritised in the text of the management plans, and some of the unanswered questions about goals, objectives and responsibilities that NZCA has raised here (and in previous conversations with DOC staff and in submissions) need to be addressed before the HOSI are established and agencies move to the development of implementation plans.

# **Bruce McGregor - OSPRI Farmer Committee - Hawke's Bay**

Submission Details

## Eirwen Harris Mitchell

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**From:** Bruce McGregor s9(2)(a)  
**Sent:** Monday, 8 December 2025 5:56 am  
**To:** sikaHOSIHMP  
**Subject:** Submission from HB Ospri Committee.  
**Attachments:** SIKA HOSI Submission Dec 2025.pdf

**Categories:** Green Category

Please find our submission attached.

Regards

Bruce McGregor

s9(2)(a)

4/12/2025

**Prepared by Bruce McGregor – Chair of OSPRI Farmer Committee – Hawke’s Bay, on behalf of the OSPRI Farmer Committee in Hawke’s Bay**

### **Submission on the Sika Herd of Special Interest Proposal: Supporting the Use of 1080 for TB Eradication**

The OSPRI Committee representing Hawke’s Bay are a group of farmers and industry representatives that act as voice for our local farming communities on OSPRI programmes, NAIT, TBfree and Mbovis.

Given we know that TB is still present in areas of Hawke’s Bay we want to ensure that OSPRI has a clear pathway forward to eradication of the disease, resulting in zero infected herds and zero impact on farming families.

Therefore, under this proposal we (Committee members listed below) are submitting our concerns with the proposed Sika HOSI and the impact this may have on the success of the TBfree programme within the Kaweka Forest Park.

While we support the objectives outlined in the Central North Island Sika Foundation’s proposal to manage sika deer populations for ecological restoration and improved hunting experiences, we strongly urge decision-makers to ensure that the management approach also prioritizes New Zealand’s national biosecurity goals—particularly the eradication of bovine tuberculosis (TB)—and that the use of 1080 remains a key tool in achieving these outcomes.

#### **Why 1080 is Critical in the Context of This Proposal:**

##### **1. Integrated Management for Forest Health and Disease Control**

The proposal rightly emphasizes reducing sika deer densities to allow canopy regeneration and protect biodiversity. We know that possums are proven TB vectors and very present in the Kawekas. If we do not maintain effective possum population control using aerial 1080 operations, we risk undermining both ecological objectives and TB eradication efforts. Aerial 1080 is the only method that can achieve consistent coverage across the vast, rugged terrain of the Kaimanawa and Kaweka Forest Parks and we would like to ensure the Sika Herds of Special Interest doesn’t halt the ongoing need for aerial 1080 for TB disease eradication.

##### **2. Complementary to Professional and Recreational Hunting**

The HOSI proposal includes professional knockdown and maintenance operations, as well as hunter-led interventions. While these are valuable, they

cannot match the efficiency and reach of aerial 1080 in remote areas. Combining these methods ensures that forest regeneration targets and TB control goals are met simultaneously.

**3. Evidence-Based and Environmentally Responsible**

Decades of research confirm that 1080 breaks down naturally, does not accumulate in soil or waterways, and poses minimal risk to native species when applied under strict protocols. The ecological benefits—restoring canopy species, protecting biodiversity, and reducing TB reservoirs—far outweigh the risks when managed responsibly. Deer repellent is also an option where if an aerial was to be planned in an area where the HOSI may be located, there is an openness to using this tool to mitigate impact.

**4. Alignment with National Strategies**

The TBfree programme and Predator Free 2050 initiatives depend on integrated pest control strategies, including 1080. Reducing or removing 1080 from the toolbox would jeopardize these nationally significant goals and prolong the timeline for TB eradication, increasing costs and risks for farmers and communities.

**Conclusion:**

The HOSI proposal provides an excellent framework for managing sika deer and improving forest health. However, it is vital that decision-makers do not shy away from using 1080 as part of this integrated approach. Its continued use is essential for TB eradication, biodiversity protection, and the long-term health of our forests and farming sector.

Our submission supports a collaborative approach to managing the HOSI alongside the TBfree programme so that disease eradication is not hindered or slowed down in Kaweka Forest Park.

**Hawke’s Bay OSPRI Farmer Committee members:**

<b>Levy paying Farmer</b>	<b>Industry Representative</b>
B. McGregor – Chair	M. Mitchell
B. Crosse – Deputy Chair	K. Mitchell
S. O’Donnell	R. Brenstrum
D. Dolan	A. Scotland
N. Aitken	
N. Broad	
K. Burden	
G. Mitchell	

# **John Menneer - East Coast Hawke's Bay Conservation Board**

Submission Details

## Eirwen Harris Mitchell

---

**From:** John Menneer s9(2)(a)  
**Sent:** Saturday, 6 December 2025 8:51 pm  
**To:** sikaHOSIHMP  
**Subject:** Submission: Draft herd management plan for proposed sika deer Herd of Special Interest  
**Attachments:** Submission on HOSI Draft Herd Managmt Plan.pdf  
**Categories:** Green Category

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

Submission attached from the Hawke's Bay/East Coast Conservation Board.

### John Menneer (co-chair)

**Mob:** s9(2)(a)

**Home:** s9(2)(a)

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

**Submitter: Hawke's Bay/East Coast Conservation Board**

**Author: John Menneer (Co-chair Hawke's Bay/East Coast Conservation Board)**

## **Preamble**

This submission is a collective response from the Hawke's Bay/East Coast Conservation Board, whose members are appointed under the Conservation Act 1987 to represent the interests of conservation and the community across the Hawke's Bay and East Coast regions. The Board's statutory role includes advising the Department of Conservation and the New Zealand Conservation Authority on conservation management strategies, plans, and policies, and advocating for the protection and enhancement of natural and historic resources.

## **Resolution**

On the 5<sup>th</sup> December 2025 the Hawke's Bay/East Coast Conservation Board resolved to make the following submission on the Draft Herd Management Plan for the proposed Sika Herd of Special Interest (HOSI). This resolution reflects the Board's commitment to ensuring that conservation and biodiversity outcomes remain the primary focus of any deer management strategy, while recognising the role of hunting as a management tool.

## **Introduction**

We appreciate the opportunity to provide feedback on the Draft Herd Management Plan for the proposed Sika Herd of Special Interest. Whilst we welcome the renewed focus on managing deer in our precious forest ecosystems, we have reservations about whether a Herd of Special Interest (HOSI) is the best solution for managing deer. This approach potentially elevates the value of an introduced species in a way that conflicts with core conservation principles. Our preference is for management strategies that prioritise ecosystem health and biodiversity whilst still recognising the role of hunting as a management tool and deer as a valued hunting resource.

## **General Support for the Plan**

We support the intent to improve deer management and reduce ecological impacts in Kaimanawa and Kaweka Forest Parks. The emphasis on adaptive management, monitoring, and collaboration is positive. However, this should occur within a framework that acknowledges the need to balance priorities between conservation (or habitat) outcomes and hunting resource values. Conservation and habitat outcomes must remain the primary objective, but hunting can play an important role as a management tool to achieve those outcomes—not as an end in itself.

## **Collaborative Development**

To achieve the objectives outlined in the plan, it is critical that development and implementation occur through a collaborative effort between groups that hold different values, including conservation advocates, hunting organisations, iwi, and local communities. This will ensure that balanced views are considered and that the plan reflects a shared vision.

## **Recommendation for an Overarching Management Group**

We recommend establishing a management group comprising representatives from the Department of Conservation (DOC), the Game Animal Council (GAC), iwi, hunting organisations, and other relevant stakeholders. This group should oversee the plan development and its implementation, monitor progress, and provide adaptive management responses as needed.

## **Key Recommendations**

- Maintain a strong focus on ecological outcomes whilst supporting sustainable hunting.
- Ensure active involvement of iwi and incorporation of mātauranga Māori in decision-making.
- Develop transparent reporting and monitoring systems accessible to the public.
- Adopt adaptive management practices to respond to changing conditions and new information.
- Facilitate ongoing dialogue between conservation and hunting interests to maintain trust and collaboration.

## **Addressing Key Concerns**

We acknowledge that there are some concerns regarding the Herd of Special Interest (HOSI) approach to game and habitat management. Below are proposed solutions:

### **Concern 1: Conflict with Conservation Principles and Te Tiriti o Waitangi**

A HOSI may conflict with conservation principles and Treaty obligations by prioritising a pest species and limiting Māori authority over taonga.

#### **Solutions:**

- Establish co-governance arrangements with iwi to uphold rangatiratanga and ensure taonga species are protected.
- DOC should lead ecological priorities, with the Game Animal Council acting as a partner in implementation and stakeholder engagement.

### **Concern 2: Ecosystem Health vs Acceptable Damage**

Managing deer to “acceptable damage” is inadequate; ecosystems should be restored to a flourishing state before setting deer limits.

#### **Solutions:**

- Shift management objectives to achieving a flourishing ecosystem state before setting deer population limits.
- Use adaptive management to maintain this healthy state over time.

### **Concern 3: Maximum Deer Densities**

Deer density limits should reflect ecological value, with zero density in degraded zones until recovery.

#### **Solutions:**

- Partition Public Conservation Land (PCL) into zones based on ecological value.
- Set deer density limits by zone, including zero density in heavily degraded areas until recovery is achieved.

### **Concern 4: Conflict of Interest in Monitoring**

Monitoring and pest control should be led by DOC to avoid conflicts of interest where hunting interests could influence ecological decisions or compromise transparency in reporting outcomes.

#### **Solutions:**

- Assign DOC as the lead agency for monitoring and pest control, including deer.
- Position the Game Animal Council as a partner for management plan development, hunter engagement, education, and collaborative initiatives, whilst ensuring DOC retains primary responsibility for ecological outcomes.

## **Summary**

In summary, we support the goal of improving deer management and reducing ecological impacts but believe this must be achieved through a framework that prioritises conservation and habitat outcomes above all else. Whilst hunting can play an important role as a management tool, it should not drive decision-making. We recommend a collaborative governance model that includes iwi, DOC, and GAC, with DOC retaining primary responsibility for ecological outcomes. Clear zoning, adaptive management, and transparent monitoring will be essential to ensure that ecosystems flourish and that deer populations are managed sustainably. Thank you for considering this submission. We look forward to seeing a management plan that reflects a balanced, collaborative approach and delivers positive outcomes for both conservation and recreational hunting.

# Andrew Mentor

Submission Details

## Eirwen Harris Mitchell

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**From:** David Owen  
**Sent:** Tuesday, 16 December 2025 9:34 am  
**To:** sikaHOSIHMP; wapitiHOSIHMP  
**Subject:** FW: Commission: CORM | JMC-1062: Opposing the protection of pest deer in conservation areas

**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](http://www.doc.govt.nz)



---

**From:** Andrew Mentor s9(2)(a)  
**Sent:** Monday, 8 December 2025 10:11 PM  
**To:** Hon James Meager s9(2)(a)  
**Cc:** Hon Tama Potaka s9(2)(a); Celia Wade-Brown s9(2)(a)  
s9(2)(a); Bronwyn BauerHunt s9(2)(a)  
**Subject:** JMC-1062: Opposing the protection of pest deer in conservation areas

Minister James Meager.

Kia ora James

I strongly oppose new legislation to allow deer to be a protected pest in our conservation areas.

This decision goes against all common sense from an environmental point of view. The government needs to be promoting forest health and recognizing deer are a major pest of the forest under story by browsing seedlings and stripping bark from mature trees.

This legislation will allow deer to proliferate and undo the work of deer-cullers over many decades.

Deer are out of control in so many areas and so there is absolutely no reason to give them legal protection on conservation land which will just accelerate deer population growth, block urgently needed population-control culls in the future and set a terrible precedent. Our forests will become even more degraded leading to skinny, unhealthy deer unable to feed themselves. This will become an animal welfare disaster as well as a forest health disaster.

My plea is to support hunters to become conservation minded and proactive in deer control working along with the conservation community towards a common purpose for the good of the forest. Please understand that deer in the New Zealand bush is not something that is sustainable in the long-term. Deer (and pigs and wallabies) are already out of control. Creating protected deer-hunting blocks in Fiordland for commercial interests isn't good management, it is short-sighted and biased politics.

Please do the right thing and have a second look at what is at stake here. Please have the courage to reverse this direction.

Do not give deer legal protection on our conservation lands. Listen to common sense and the lessons of history. Do not become a willing partner in forest collapse.

Yours sincerely

Andrew Mentor

s9(2)(a)

Kiwi Handler, pest controller and voter.

s9(2)(a)

# Ashleigh Mitchell - Tamatea P kai Whenua

Submission Details



Tamatea Pōkai Whenua

**A:** L1/117 Heretaunga Street West, Hastings Central, Hastings, 4122  
**P:** 06 876 6506 • **E:** [office@tpw.iwi.nz](mailto:office@tpw.iwi.nz) • **W:** [www.tpw.iwi.nz](http://www.tpw.iwi.nz)

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28 November 2025

Hon James Meager  
Minister for Hunting and Fishing  
Email: [sikahosihmp@doc.govt.nz](mailto:sikahosihmp@doc.govt.nz)  
Online Portal: [www.doc.govt.nz/sika-hosi-consultation](http://www.doc.govt.nz/sika-hosi-consultation)

Tēnā koe,

**Re: Tamatea Pōkai Whenua Formal Submission – Sika Herd of Special Interest Draft Herd Management Plan**

Tamatea Pōkai Whenua (TPW) acknowledges the opportunity to provide feedback on the Sika Herd of Special Interest Draft Herd Management Plan. We acknowledge the Minister's correspondence of 4 April, 20 October and 6 November 2025, and we also valued the recent kanohi-ki-te-kanohi meeting with DOC, which helped clarify the intent and statutory context of the proposal, as well as engagement with other Treaty Partners across the rohe.

As a Post-Settlement Governance Entity (PSGE), TPW is currently working toward establishing a broader, integrated conservation management approach for our rohe. Processes such as Wild Animal Management Plan and now the proposed Sika HOSI sit within a wider conservation landscape that we are in the early stages of coordinating. Until this broader framework is in place, TPW is cautious about taking definitive positions on individual management tools.

For this reason, TPW's position on the draft Plan at this stage is neutral. We neither endorse nor oppose the proposal. We acknowledge the need for action to support forest health and ecological outcomes, while also recognising that the current process raises broader questions around alignment, mana whenua involvement, and long-term conservation planning.

Tamatea Pōkai Whenua has prepared the following key points for your consideration. These are intended to support effective engagement with iwi and to assist in ensuring that iwi interests, cultural values, and Treaty responsibilities are appropriately incorporated into decision-making and operational implementation. Strengthening these aspects will help ensure the Crown's obligations under the Heretaunga Tamatea Settlement and wider conservation legislation are upheld throughout the development and delivery of the Herd Management Plan.

**Submission Points**

**Treaty Settlement Obligations:** Statutory Acknowledgement, Deeds of Recognition, and Cultural Redress.

In relation to this herd management plan, TPW's responsibilities and interests are grounded in the Heretaunga Tamatea Claims Settlement Act 2018<sub>40</sub>

## **Statutory Acknowledgements**

Clauses 17.1–17.3

These confirm the Crown’s acknowledgement of the cultural, spiritual, historical, and traditional associations of Heretaunga Tamatea with specific statutory areas.

Implication for HOSI: Activities affecting relevant statutory areas must involve meaningful engagement with TPW to ensure cultural values are understood and considered.

## **Deeds of Recognition**

Clauses 19.1–19.4

These require the Crown to:

- have particular regard to the views of TPW; and
- consult with TPW on specified matters relating to the management of those areas.

Implication for HOSI: Drafting, refining, and implementing the HMP must include active consideration of TPW views.

## **Cultural Redress: Kaitiaki Responsibilities**

Clauses 22.1–22.5

These recognise TPW’s role as kaitiaki of whenua, wai, and taonga species, and our ongoing relationship with sites of significance.

Implication for HOSI:

- Ecological protection must remain central.
- Monitoring and operational planning should reflect mātauranga Māori, where appropriate.
- Mana whenua must have opportunities to contribute to monitoring, restoration, and implementation phases.

Recommendation:

That the Minister and DOC ensure the final HMP explicitly recognises and integrates TPW’s Treaty settlement responsibilities and provides for ongoing engagement consistent with statutory acknowledgements, deeds of recognition, and cultural redress provisions.

## **Engagement and Process**

TPW notes that early engagement with mana whenua has been limited, with planned workshops earlier in 2025 not proceeding and much of the draft Plan being prepared prior to iwi having meaningful opportunity to contribute. TPW further notes that effective ongoing engagement cannot be achieved without adequate resourcing. Current engagement expectations rely largely on unfunded iwi capacity, creating inequity and constraining the ability of mana whenua to participate fully at both strategic and operational levels.

TPW considers it fundamental that future processes recognise the inherent value iwi bring to conservation planning and delivery, including mātauranga Māori, place-based knowledge, governance insight, workforce capability, and monitoring and implementation expertise.

Recommendation:

Future phases, including operational planning and monitoring, must include structured, ongoing iwi engagement that is appropriately resourced and enabled, ensuring mana whenua can contribute equitably and meaningfully as partners in strategy<sup>41</sup> development, monitoring, and implementation.

## **Alignment with Existing Work (WAMP and wider conservation planning)**

The WAMP (Ruahine Wild Animal Management Programme) is already a significant programme addressing deer impacts and ecological restoration in our rohe, with TPW representation.

The HOSI proposal is separate but closely related work, and both sit within a much larger conservation framework that TPW is still developing.

### Risk:

Potential duplication, conflict, or unaligned expectations if HOSI and WAMP proceed without a clear cohesion strategy.

### Recommendation:

Clarify how HOSI will align with WAMP and how both will be integrated within broader long-term conservation work in the region.

### Rationale:

Each individual plan should operate as part of a coordinated whole.

## **Ecological Considerations**

TPW supports the intent to improve forest health and biodiversity. However, the ecological section of the plan may not yet fully address the risks of maintaining higher deer populations or the practical implications of balancing recreational hunting with ecological recovery.

### Recommendation:

Ensure ecological considerations remain the primary standard against which all operational decisions are measured and aligned with DOC's statutory obligations and TPW's cultural responsibilities.

## **Representation and Governance**

The current draft does not outline how mana whenua will be involved in ongoing decision-making, monitoring, or annual operational plans.

### Recommendation:

Where feasible and appropriate, include iwi involvement in:

- governance or advisory structures
- monitoring design
- annual operational plan development
- implementation roles (including paid positions)

## **Final Position**

Tamatea Pōkai Whenua submits neutrally on the Sika Herd of Special Interest Draft Herd Management Plan.

We acknowledge the need for action to support the health of the whenua and forest ecosystems and welcome continued engagement with DOC and the Minister. Our submission reflects the statutory responsibilities we hold under the Heretaunga Tamatea Settlement Act and the need for alignment across multiple conservation processes.

TPW looks forward to ongoing conversation and constructive collaboration as the process continues.

Nāku noa, nā

A handwritten signature in black ink, appearing to be 'Darryn Russell', written over a horizontal line.

Dr Darryn Russell  
Chief Executive  
Tamatea Pōkai Whenua

s9(2)(a)

s9(2)(a)

## Eirwen Harris Mitchell

---

**From:** Dave Carlton  
**Sent:** Tuesday, 9 December 2025 11:07 am  
**To:** sikaHOSIHMP  
**Subject:** FW: Tamatea Pōkai Whenua Response to HOSI Draft Plan  
**Attachments:** 2025.11 HOSI Submission Letter .pdf

**Categories:** Green Category, Orange Category

This might already be in the inbox but just to make sure...

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**From:** Ashleigh Mitchell [s9(2)(a)]  
**Sent:** Tuesday, 9 December 2025 10:43 am  
**To:** Dave Carlton [s9(2)(a)]  
**Subject:** FW: Tamatea Pōkai Whenua Response to HOSI Draft Plan

Kia ora Dave,

I made our draft submission to the HOSI on the 3 December and an automatic email followed. I decided to wait to fully submit the draft in case any TPW trustees had further feedback. I was out of office yesterday to click the submit button and have since forwarded our submission on to the email address which forwarded the letters regarding the HOSI kaupapa.

Please find TPW's letter attached. We have not made direct comments to the plan itself.

Ngā manaakitanga,  
Ash



Tamatea Pōkai Whenua

**Ashleigh Mitchell**  
*Relationship Advisor*

L1/117 Heretaunga St West,  
Hastings  
☎ - [s9(2)(a)]  
✉ - [s9(2)(a)]  
💻 - Heretaungatamatea.iwi.nz

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**From:** Ashleigh Mitchell [s9(2)(a)]  
**Date:** Tuesday, 9 December 2025 at 10:29 AM  
**To:** James Meager (MIN) [s9(2)(a)]  
**Subject:** Tamatea Pōkai Whenua Response to HOSI Draft Plan

Tēnā koe,

I could not submit my response in letter format when making a submission to comment on the HOSI plan. However, it may still be in draft format on the DOC website.

Please see the attached letter that includes the comments and recommendations for the draft HOSI plan on behalf of Tamatea Pōkai Whenua.

Ngā mihi,  
Ashleigh Mitchell



**Ashleigh Mitchell**  
*Relationship Advisor*

L1/117 Heretaunga St West,  
Hastings

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💻 - Heretaungatamatea.iwi.nz

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**From:** James Meager (MIN) s9(2)(a)

**Date:** Monday, 10 November 2025 at 3:06 PM

**To:** Ashleigh Mitchell s9(2)(a)

**Subject:** JMC-893 - Letter from Hon James Meager

Dear Ashleigh,

On behalf of the Minister for Hunting and Fishing, Hon James Meager, please find attached a letter from the Minister.

Kind regards,



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*

# Andrew Morrison – Hunters for Conservation Trust

Submission Details

## SUBMISSION ON DRAFT GAME MANAGEMENT PLANS FOR HERDS OF SPECIAL INTEREST ('HOSI' )

--BOTH WAPITI and SIKA HERDS

Wapitihosihmp@doc.govt.nz and sikahosihmp@doc.govt.nz

The Trustees of Hunters for Conservation Trust ( HFC ) Submit As Follows—

HFC is a Trust established to promote Education and Advancement of conservation throughout the large NZ Hunters Constituency , to provide perceptive and authoritative leadership for the wide sector ( without 'competing' with existing organisations,) and to raise funds for hunter-led Conservation projects , and for all these purposes to work constructively alongside Game animal Council (GAC ) and Department of Conservation (DOC ) AND Government .

HFC RESPECTFULLY SUBMITS : --

1. That HFC supports the broad concept and format of the draft Management Plans for both Wapiti AND Sika herds designated as HOSI s (Herds of Special Interest) . .
2. The introduction of Management Plans represents a sound reform of the ineffectual and historically unsound 'extermination' provisions which together with inflexible and implausible policies precluded responsible game animal management and control.
3. The Legislation now enables the adoption ---and periodic development - of sustainable AND INDEED Hunter-led management , and control ( i.e. of numbers and spread ) of valued game animal species in important wilderness areas . HFC supports the Plans as proactive rather than reactive , so that they are collaborative in essence . HFC is ready and willing to collaborate with GAC and with Government in assisting the introduction and active operation of the game animal management Plans .
4. HFC supports the concept of the SIKA management Plan intended to guide day to day deer management of Kaimanawa and Kaweka Forest Parks , by actively managing deer numbers at levels which improve forest regeneration while enhancing recreational hunting
5. The sika Herd is an important local resource in the Central North Island---a well-managed herd is important to our culture . tourist amenities , and general business structures . Local Community including family enjoyment and involvement in this extensive natural environment , is part of our overall Kiwi DNA .Iwi and local hapu treat wild game as a cornerstone source of kai , both in this area and throughout NZ.
6. HFC similarly supports the Wapiti Management Plan directed to do the same in Fiordland National Park, actively supporting the ongoing work of the Fiordland Wapiti Foundation and looking to maintain a high-quality but relatively low-density deer herd functioning in a thriving natural environment.
7. The Wapiti herd generates a much valued hunting resource in a remarkable natural wilderness area , attracts visitors from NZ, Australia and further abroad – and attracts strong tourism but also strong contributions to the Fiordland Wapiti Foundation and its work. The HOSI concept will focus on safeguarding these contributions and at the same time strengthen the important natural environment values.

8. HFC endorses the overall draft Plan focus on community participation , the relevance of hunter-led conservation and roles , and the overall purpose of facilitating better management of herds and environment .
- 9 HFC perceives a sound prospect of integrated conservation and game animal management inherent in the draft Plans , which deliberately seek to balance the vital preservation of NZ 'S precious wilderness areas alongside daily realities of conservation and wild animal management.

FOR AND ON BEHALF OF Hunters For Conservation Trust :--

Richard Burdon, Chairman

Andrew Morrison , Dame Lynda Topp, Ross Hyland , Don Hammond ,Rachel Ritchie , Andy Tannock , Cam McKay --TRUSTEES.

Item of business :

# Game Animal Council (Herds of Special Interest) Amendment Bill

Submission name :

## HUNTERS FOR CONSERVATION TRUST

### Comments

The Hunters for Conservation Trust was established in 2022 expressly to provide a unified Lead Organisation for the many diverse Hunters Groups in NZ , AND IN PARTICULAR TO EDUCATE AND GUIDE HUNTERS IN CONSERVATION OF NZ WILDERNESS AND WILDLIFE .THERE ARE SOME 1.25 MILLION ACTIVE HUNTERS IN NZ.

Our trust submits in support of the Bill, and in particular supports the submissions already filed by GAME ANIMAL COUNCIL and FISH & GAME COUNCIL.

IT IS IMPORTANT THAT-

- a. The GAME ANIMAL COUNCIL (GAC ) is independent of Dept of Conservation
- b. That GAC is given increased funding
- c, That GAC has the official function to implement HOSI without delegated authority from the Minister.

THE HFC SUPPORTS THE BILL because--

a. Game animals in NATIONAL PARKS are important and valuable , to recreational hunters, tourists(hunters and general ) to provide valuable food resources to many citizens , and to provide valuable recreational and interesting parts of our environment.

b. Game animals forming a HOSI in National Parks greatly enhance sound hunting practices and control , because inter alia-

\*Well-managed game animals provide a high quality , low quantity herd which produces better and much treasured trophy animals

\*The herd lives in a sound healthy managed habitat

c. HOSI in National Parks can enable better conservation outcomes --

\* Hunter -led animal management programmes deliver conservation benefits by active herd monitoring , and concurrent protection of native species

\* Hunter-led HOSI INVOLVEMENT means greater community involvement in conservation initiatives, including predator controls conducted by Hunter groups .

\* HOSI will be subject to detailed herd management plans , which incorporate protection of native species and flora

d. Community -led conservation is imperative to help manage our National Parks, because--

\*DOC BUDGETARY limits necessitate active hunter-led contributions. that is precisely what HFC exists to contribute and coordinate.

### **Recommendations**

A. THAT THE BILL is supported and passed , but on terms that the National Parks act is amended to make HOSI s exempt from the existing ancient extermination policy.

B. That the GAME ANIMAL COUNCIL ACT Section 1994) is amended so that HOSI Herd management plans have regard to other provisions(rather than be subject to, or necessarily consistent with)

C. That the Minister have authority to gazette HOSI s without first needing management plan approval

HUNTERS FOR CONSERVATION TRUST

[www.huntersforconservation.co.nz](http://www.huntersforconservation.co.nz)

c/o [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

The Director

DEPARTMENT of CONSERVATION

P.O.BOX 4715

CHRISTCHURCH 8140

[wapitihosihmp@doc.govt.nz](mailto:wapitihosihmp@doc.govt.nz)

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

Dear Sir ,

The Hunters for Conservation Trust HEREBY lodges Submissions on the Draft Management Plans for both Wapiti AND Sika HOSI establishment . We attach—

1. Submission
2. Copy of earlier submission filed in respect of the GAME ANIMAL COUNCIL(Herds of special Interest) Amendment Bill ( Our Trustee Dame Lynda Topp appeared in support)

We are ready and willing to attend and address any matters arising from our serious and substantive submissions.

Yours sincerely,

FOR AND ON BEHALF OF HUNTERS FOR CONSERVATION TRUST

Richard Burton-Chairman. Andrew Morrison, Ross Hyland, Don Hammond, Rachel Ritchie , Dame Lynda Topp, Andy Tannock, Cam McKay.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

# Patricia Nuku - Te Piringa Hapū

Submission Details

## Eirwen Harris Mitchell

---

**From:** Patricia Nuku s9(2)(a)  
**Sent:** Wednesday, 10 December 2025 4:35 pm  
**To:** sikaHOSIHMP  
**Cc:** Patricia Nuku s9(2)(a)  
**Subject:** Draft herd management plan for proposed sika deer Herd of Special Interest

**Categories:** Green Category

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

Mauri ora tatou,

Arohamai I had tried to send my submission through the online portal on Monday, but it kept glitching out and so I hope you take my email into consideration.

### **Te Waiora Taiao – Te Piringa Hapū Submission on the Sika Herd of Special Interest Draft Herd Management Plan**

**To: DOC Sika HOSI project team**

Department of Conservation – Sika HOSI Draft Herd Management Plan Submissions

Email: sikahosihmp@doc.govt.nz

**From: Patricia Nuku Te Waiora Taiao Lead at Te Piringa Hapu authority trust.**

(Ngāti Hinemanu, Ngāi Te Upokoiri, Ngāti Honomōkai, Ngāti Mahuika)

**Date:** 10 December 2025

**Subject:** Submission Opposing the Sika Herd of Special Interest Draft Herd Management Plan

Nā mātou nei, the hapū of **Te Waiora Taiao – Te Piringa**, we oppose the *Sika Herd of Special Interest Draft Herd Management Plan* and the designation of sika deer as a *Herd of Special Interest* (HOSI) in the Kaimanawa and Kaweka Forest Parks and Kaweka Conservation Area. Our opposition is grounded in our responsibilities as **Mana Whenua**, our whakapapa connections to the Ruahine, Kaimanawa and Kaweka ranges, and our kaitiaki obligations to protect our whenua, wai, ngā tipu katoa me ngā kararehe katoa (land, water, flora and fauna) for future generations.

#### **1. Lack of Meaningful Engagement with Mana Whenua**

We acknowledge the statutory requirement for DOC and the Minister to engage with Treaty partners during the development of the Plan. However, **the Central North Island Sika Foundation and associated agencies have not meaningfully engaged with Ngāti Hinemanu, Ngāi Te Upokoiri, Ngāti Honomōkai, or Ngāti Mahuika**, nor our affiliated marae, regarding this proposal. Any initiative that affects taonga species, ecosystems and the wellbeing of conservation lands must be developed with genuine partnership at its core.

[NZ Government Docs+1](#)

#### **2. Sika Deer Are Not a Taonga Species**

Sika deer are an **introduced species** and do not meet the criteria of being a taonga or indigenous species. Designating them as a *Herd of Special Interest* elevates an invasive pest above the protection of native ecosystems. DOC's own threat assessments show that deer damage native understory vegetation, forest regeneration, and contribute to habitat degradation — negatively affecting biodiversity and forest health. [NZ Government Docs](#)

#### **3. Negative Ecological Impacts of Deer**

Decades of ecological research and pest management documentation confirm that deer browsing alters native plant communities, reduces seedling recruitment, and increases soil erosion risk. The loss of vegetation ground cover changes hydrological processes, increasing erosion and sedimentation, which directly impacts our awa and whenua connected to these ranges. [NZ Government Docs+1](#)

Sika and red deer browsing contribute to:

- Loss of native understory plant species critical for ecosystem regeneration.
- Degradation of soil structure and stability, increasing erosion risk.

- Reduced habitat availability for native birds, insects and invertebrates.

These impacts contradict DOC’s published objectives for indigenous biodiversity protection and maintaining ecological integrity across conservation lands.

#### 4. Over-Abundance and Management Reality

Sika numbers in the Kaweka–Kaimanawa area are widely acknowledged to be **high and unmanaged at ecologically safe levels**. Management plans like the draft *HOSI* are framed to “manage sika numbers” but fail to commit to robust, science-led reduction targets that prioritise ecosystem recovery over recreational hunting interests. [NZ Government Docs](#)

#### 5. Precedent Risks and Conservation Policy

Forest & Bird and other conservation bodies have warned that the *HOSI* concept undermines New Zealand’s conservation mandate by potentially prioritising game values over ecological values. Introducing game species protection mechanisms on public conservation land sets a concerning precedent for pest species management nationwide. [forestandbird.org.nz](http://forestandbird.org.nz)

#### 6. Our Kaitiaki Mandate

As hapū with ancestral links to the Ruahine, Kaimanawa and Kaweka ranges, we have long practiced kaitiakitanga (guardianship) to preserve the mauri and resilience of natural systems. We uphold tikanga and mātauranga in the protection of native species and landscapes. Allowing sika to be treated as a *HOSI* conflicts with this duty and places further stress on ecosystems already compromised by invasive browsing.

#### Conclusion and Requested Actions

For the above reasons, we **formally oppose** the Sika Herd of Special Interest Draft Herd Management Plan and the designation of sika deer as a *Herd of Special Interest*. We request the following:

1. The proposal be withdrawn or substantially revised to prioritise:
  - **Eradication or sustained ecological control** of sika deer over recreational normalization.
  - **Meaningful engagement and co-design with all affected Mana Whenua**, especially Te Waiora Taiao – Te Piringa Hapū.
2. Management objectives remain fully aligned with:
  - **Indigenous biodiversity protection.**
  - **Restoration of native ecosystems and taonga species habitats.**
  - **Respect for kaitiakitanga, whakapapa and cultural values of local iwi and hapū.**

We stand ready to engage constructively with DOC and the Minister to ensure sika deer management reinforces New Zealand’s conservation commitments, te Tiriti obligations, and rangatiratanga of Mana Whenua.

Ngā mihi,  
Patricia Nuku

#### Te Waiora Taiao Lead at Te Piringa Hapū

(Ngāti Hinemanu, Ngāi Te Upokoiri, Ngāti Honomōkai, Ngāti Mahuika)



**Patricia Nuku**

Te Takawaenga Marae Hapu Hapori

Te Manaaki Taiao

Tel: s9(2)(a)

Mob: s9(2)(a)

0800 TAIWHENUA | [ttoh.iwi.nz](http://ttoh.iwi.nz)

s9(2)(a)

PO BOX 718, Hastings 4156  
Aotearoa New Zealand



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# Mike Penn

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 because of increasing concerns around the lack of sustainable management of the central north island sika herd, with observations of skinny Sika and damaged forests in parts of the central high country.

The Foundation 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.

The Sika Foundation supports the Central North Island Sika herd being gazetted as a Herd of Special Interest.

The Sika Foundation supports the HMP as amended by this submission. The draft Sika HMP should be amended to include those relevant considerations set out in the original Sika HOSI Proposal. We submit that the HMP be amended to incorporate and address the following points:

1. The Sika Foundation values the Central North Island Sika herd as a highly regarded hunting resource that forms part of the very fabric of the central high country. It has 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 an appropriate balance between values and consequences to be found.
2. The Sika Foundation submit the HMP must explicitly express the values of a Sika herd as set out in this submission and the required management approaches that flow from them. The Sika Foundation submit that the values identified in this submission should be reflected through the Objectives of the HMP.

3. 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.
4. 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.
5. The Sika Foundation submit that the draft HMP is amended to include the nine (9) proposed Management Units (MU’s) set out in its original HOSI proposal. 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’.
6. 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 the Sika herd interacts with the landscape and the hunting pressure it is under, 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. The Sika Foundation submit that the draft HMP is amended to reflect these monitoring considerations.
7. 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/km<sup>2</sup> (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/km<sup>2</sup>. 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 tall tier is unrealistic. The Sika Foundation seeks that the Draft HMP is amended to recognise realistic ecological outcomes and does not set objectives and methods including monitoring which go beyond that which are attainable through management of the herd,

or which would not uphold the herd or its hunting values. Specifically, the Foundation submits that Section 2.2 be amended to include “using industry agreed best practice” and delete “in accordance with relevant standards used or set by the Department of Conservation”.

8. 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 and seek that this is deleted from the draft HMP Herd. Hunting outcome measures that should be included in the HMP are set out below:
  - 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)
9. 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.
10. 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. . The Sika Foundation submit that the draft HMP be amended to reflect these considerations.
11. In acknowledging the need to work collaboratively with Treaty Partners, their role both in holding Mana Whenua over 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. The Sika Foundation submit that the draft HMP be amended to explicitly address these considerations.
12. 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). ). The Sika Foundation submit that the draft HMP be amended to ensure that these considerations are included and that the views of the hunting sector in relation to maintaining free and open access to Sika as a high value meat animal and for recreational hunting are provided for.

13. 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 management operations (where ecological monitoring data shows these might be required) and the habitat monitoring costs themselves, due to the conservation benefit that will result.
14. 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, such as Game Animal Council and the Sika Foundation, 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.
15. 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).
16. 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 supported; GAC enabled; 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". The signature is written in a cursive style with a large, sweeping initial "J".

**John Cook**  
**Sika Foundation President**

# Marcus Pinney - SCI NZ

Submission Details

## Eirwen Harris Mitchell

---

**From:** Marcus Pinney s9(2)(a)  
**Sent:** Monday, 8 December 2025 10:34 am  
**To:** sikaHOSIHMP  
**Subject:** SCI NZ Submission on the Sika Draft Herd Management Plan  
**Attachments:** SIKA HERD MANAGEMENT PLAN SUBMISSION.docx

**Categories:** Green Category

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Dear Sir / Madam,

Attached is the SCI NZ. submission on the Sika Herd Draft Management Plan.

If there is any part of our submission you wish to discuss, please do not hesitate to get in contact with me.

Regards

Marcus Pinney

President  
SCI New Zealand Chapter



## SIKA HERD MANAGEMENT PLAN SUBMISSION

- Safari Club International NZ Chapter
- s9(2)(a)
- s9(2)(a)
- s9(2)(a)

### **SCI NZ fully supports gazetting a Central North Island Sika HOSI**

### **SCI NZ supports the Herd Management Plan with a few amendments**

The Central North Island Sika herd is of huge importance to the people of New Zealand as a hunting resource, especially the North Island hunting community as a food and recreational resource. *Furthermore the Sika Herd is of huge importance to SCI as it is the only sika herd in the South Pacific, sika are one of our important 15 game animals of the South Pacific. The Sika deer are now a huge part of the hunting culture of NZ.*

**SCI NZ would like to see the plan is amended:** so that the NZ Game Animal Council and the Central North Island Sika Foundation have the opportunity to sign off the final Management Plan. The Department of Conservation should keep to their role of controlling pests like goats and stoats and the Government should mandate the management of Game Animals to the industry experts inside the NZ Game Animal Council.

**SCI NZ seek that the plan is amended** to reflect the values as set out above, and that these are included within the Introduction to the plan, its implementation and its Purpose.

**SCI NZ Oppose** - The Department of Conservation implementation of the Sika Herd Management Plan on behalf of the Minister for Hunting and Fishing.

Implementation functions should be designated to the Game Animal Council as the statutory entity, with on the ground implementation by the Sika Foundation. Empower the Game Animal Council and ensure the council is funded to enable the NZ GAC to manage all of our future Herds of Special Interest and Game Animals.

**Oppose and seek deletion.** The Plan should set out the values of the Sika Herd and Hunting Values. Sustainable management of the herd leads to improved indigenous vegetation outcomes.

### **Hunting and recreation values**

The Sika herd is of huge importance to the hunting community, it would be so great to see the NZ Game Animal Council get this herd management plan implemented and show what genuine Game Animal Management looks like and the positive outcomes for the community and the environment. SCl would like to see improved access including aerial access to all parts of the Sika Range including the Remote Exclusion Zone. Excluding aerial access has negative conservation outcomes, why pay taxpayers dollars to do something recreational hunters are willing to do free of charge and also generate income for rural communities.

## **Objectives and Strategies**

**The proposed Objectives are opposed** and we seek that they be deleted and replaced by Objectives that reflect the values of the herd and hunting values for example:

- Provide for high quality hunting experience;
- Sika animals are healthy, Encourage the removal of female animals at correct time of year, to avoid animal welfare issues.eg not shooting hinds over fawning- November / December and January
- Trophy potential is maximised, discourage removal of stags in velvet.
- Access for hunting is enhanced. Open up seasonal aerial access to the REZ
- Hunter and community involvement in management of the herd is prioritised;
- Adaptive management – (Not like the 1993 HTCP) was supposed to be adaptive and reviewed... but never was. Why create a plan if its not going to be fully or correctly implemented?

## **Herd management Hunts**

Permit a greater number of areas to be opened up for management hunts. Including the REZ. Recreational Hunting is the best management tool we have. Shutting up aerial access is a failure to conservation values. So many of the high density game animal populations are directly related to a lack of access or access restrictions.

## **Management**

All references to control should be replaced with Management.

All the Management details and decisions should be determined by the NZ Game Animal Council with input and the Central North Island Sika Foundation.

## **Undertake Monitoring and Research to support management and decision making**

Monitoring should be done to Industry Best Practice: Monitoring should be directly related to impacts and values, monitoring should not extend beyond.

Herd Management not Habitat Management.

Improve Monitoring methods once new monitoring methods can be validated. Eg. Thermal technology etc.

All the Management details and decisions should be determined by the NZ Game Animal Council with input and advice by the Central North Island Sika Foundation.

If any parties or persons wish to discuss this further, please do not hesitate to get in contact with me.

Regards

Marcus Pinney

President of SCI NZ Chapter

# Mary Ralston

Submission Details

## Eirwen Harris Mitchell

---

**From:** Mary Ralston s9(2)(a)  
**Sent:** Friday, 5 December 2025 10:32 am  
**To:** sikaHOSIHMP  
**Subject:** Sika HOSI draft HMP Submissions  
**Attachments:** Sika Herds of Special Interest.docx

**Categories:** Green Category

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I would like make a submission on the Sika Herd of Special Interest

Mary Ralston

## Submission on Sika Herds of Special Interest

Mary Ralston

s9(2)(a)

s9(2)(a)

s9(2)(a)

2 December 2025

1. I would like to make a submission on the Sika Herd of Special Interest Draft Herd Management Plan
2. I strenuously oppose the idea of having “herds of special interest”. All ungulates are introduced animals and have no place in New Zealand’s national parks because of the damage they do to ecological communities. In many places, the New Zealand bush and forest has been stripped of understorey by deer grazing, and the understorey replaced by species that are unpalatable to deer. Our native flora has not evolved with cloven footed ungulates and so is very vulnerable. There is no level of deer grazing that is compatible with retaining native flora.
3. National parks are meant to have the highest level of protection for their outstanding natural flora, fauna and landscapes. The areas selected for national parks are of national, and international, significance. Retaining deer in these parks is incompatible with these aims.
4. Rather than allowing herds of special interest, the Department of Conservation should be adequately funded to control pest numbers in national parks and other conservation areas so that natural ecosystems can be conserved without compromise.

# **M Rameka - Ng ti Hinerau and Ng ti Hineure Te Kotahitanga o Ng ti T wharetoa**

Submission Details

**Emma Bennett**

---

**From:** Te Ra s9(2)(a)  
**Sent:** Monday, 10 November 2025 11:29 am  
**To:** sikaHOSIHMP  
**Cc:** s9(2)(a)  
**Subject:** Submission SIKA HOSIHMP

**Categories:** Green Category

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## **Te Kotahitanga o Ngāti Tūwharetoa**

On behalf of Ngāti Hinerau and Ngāti Hineure

9 November 2025

To:  
Sika Herd of Special Interest Consultation  
Department of Conservation Te Papa Atawhai  
Wellington

**Subject:** Submission on *Sika Herd of Special Interest Draft Herd Management Plan*

Tēnā koutou,

This submission is made on behalf of Ngāti Hinerau and Ngāti Hineure, as Treaty partners and constituent hapū represented within Te Kotahitanga o Ngāti Tūwharetoa.

### **1. Treaty Partnership and Consultation**

We note that the *Sika Herd of Special Interest Draft Herd Management Plan* identifies Ngāti Tūwharetoa as a Treaty partner under the Ngāti Tūwharetoa Claims Settlement Act 2018, and that Te Kotahitanga o Ngāti Tūwharetoa (TKNT) is the mandated post-settlement governance entity.

Accordingly, we expect to be consulted directly and separately as Treaty partners representing Ngāti Hinerau and Ngāti Hineure, not through general public consultation or forums. Engagement must occur through a formal Treaty relationship process, consistent with section 4 of the Conservation Act 1987 and the principles of partnership, active protection, and informed participation.

### **2. Governance and Commercial Considerations**

If the Sika Herd of Special Interest management framework is to involve any form of commercialisation—including, but not limited to, tourism, venison recovery, partnership

funding, or sponsorship—Ngāti Hinerau and Ngāti Hineure must hold a seat at the governance table of any defined structure.

Such participation must include equal voting rights and shared decision-making authority to ensure that iwi and hapū interests, rights, and kaitiakitanga are recognised and upheld throughout implementation and review phases.

### 3. Summary of Position

- Engagement must occur kanohi-ki-te-kanohi and independently of the general public process.
- Our participation must be embedded within the governance and operational structures of the plan where commercial or economic activities are contemplated.
- The principles of the Treaty of Waitangi must guide all aspects of design, implementation, and review of the Sika Herd of Special Interest management framework.

We reserve the right to provide a detailed supplementary submission once appropriate consultation has occurred between the Department, the Minister for Hunting and Fishing, and Te Kotahitanga o Ngāti Tūwharetoa representatives.

Nga mihi

*C. M. Rameka*

Te Moananui | [Taniwha Technology | 2019](#)

Contact Details: s9(2)(a)



**KIA TUPATO:** This email and any attachment(s) contains information that is both confidential and legally privileged. No one may use its content unless TE MOANANUI RAMEKA approves it. Any information contained in this email and any attachment(s) is to be treated as provisional only and for the strictly limited purpose of the recipient. MAURI ORA

# **Moira Raukawa-Haskell - Te Rūnanga o Ngāti Tamakōpiri**

Submission Details

## Eirwen Harris Mitchell

---

**From:** Admin | Mokai Patea Services s9(2)(a)  
**Sent:** Monday, 8 December 2025 2:48 pm  
**To:** sikaHOSIHMP; Dave Carlton; Moana Smith-Dunlop  
**Cc:** Moira Raukawa-Haskell  
**Subject:** Ngāti Tamakōpiri Submission letter - Sika HOSI HMP  
**Attachments:** Ngati Tamakopiri HOSI Plan submission (004).pdf

**Categories:** Green Category

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Kia ora koutou,

Please find attached the Ngāti Tamakōpiri submission on the Sika Herd Of Special Interest draft Herd Management Plan.

s9(2)(a)

s9(2)(a)

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*Mokai Patea Services*

*Mokai Patea Waitangi Claims Trust*

s9(2)(a)

*PO Box 54*

*Taihape*

s9(2)(a)



**Department of Conservation**

**Attn: Sika HOSI draft HMP submissions**

Email:

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

s9(2)(a)

s9(2)(a)

Tēnā koutou

**Ngāti Tamakōpiri submission on the Sika HOSI draft HMP**

This submission is presented on behalf of Te Rūnanga o Ngāti Tamakōpiri.

Ngāti Tamakōpiri has a keen interest in the draft Sika HOSI Plan as our rangatiratanga and kaitiakitanga obligations commit us to protecting the whenua, ngahere, and taonga species within our rohe. The Sika HOSI Plan covers areas of the Conservation Estate within our tribal domain, and also adjoins tribal whenua administered by our iwi land trusts.

At a tribal level, we have the following key comments:

1. We seek assurances that the proposed Sika HOSI Plan – and any new governance and management arrangements - does not override or impede DoC's Treaty obligations and us as an Iwi. The obligations and requirements under section 4 of the Conservation Act need to be honoured, and we seek assurances that this won't be overridden by the Sika HOSI Plan/proposals.
2. If the Sika HOSI proposals are enacted, then Te Rūnanga o Ngāti Tamakōpiri expect to be kept regularly updated by DoC on the proposed work that will be undertaken. In addition, we expect that the Owhaoko B & D Trust will also be kept regularly updated by DoC, especially in regards to operational matters that may affect our iwi land blocks that are situated alongside the Sika HOSI proposal area. The Trust are directly involved in managing our whenua and kaitiaki interests in this area at an operational level.

We are aware that our neighbouring iwi and affected land trusts are also submitting on the Sika HOSI draft HMP. We provide this submission on behalf of Te Rūnanga o Ngāti Tamakōpiri, but we also support their submissions and recognise our individual and collective interests in this kaupapa.

Ngā mihi, na

Moira Raukawa-Haskell

Te Rūnanga o Ngāti Tamakōpiri Co-chair

# Kieran Reeve

Submission Details

## SUBMISSION: SIKA HERD OF SPECIAL INTEREST (HOSI)

Name: Kieran Reeve

Email: s9(2)(a)

### 1. Position Statement

I support the Sika Herd of Special Interest (HOSI) application and support the Herd Management Plan in principle. Amendments are required to ensure the HMP accurately reflects:

- The value of the Sika herd
- Recognition of realistic & effective conservation outcomes via hunters / community led management.

### 2. Why the Sika herd matters to me

The Sika herd is important to me personally:

- For my own hunting experiences & values - not limited to providing a high quality sustainable meat source for my family, mental health clarity & physical wellbeing.
- The multitude of life skills required to hunt Sika in which I pass onto my children, friends / family & clients who come hunting with me. Skills not limited to how to properly care for the environment / current ecosystems to ensure its longevity and survival skills.
- My business, Ridgetop Guiding Ltd, which in part relies on the opportunities this herd provides for my clients. A healthy, well-managed Sika herd brings people into the region, supporting local accommodation, hospitality, retailers, and other small businesses. This herd directly contributes to the local economy and community wellbeing.

My family are committed conservationists. My partner Belinda Jones and I regularly take our children, friends with their children, and clients including corporates from overseas companies who also share a passion for the New Zealand environment and the opportunities the Sika Herd have to offer, into the backcountry. During nearly every expedition we do there will be an element of track upkeep, pest control support, monitoring, and general stewardship of the land. When empowered through a strong, values-based HMP, hunters and communities help achieve measurable conservation improvements.

For these reasons, the Sika herd provides far-reaching benefits—economic, social, cultural, and environmental—and the HMP must reflect and protect these values.

Therefore it is imperative to my values that there is:

- A healthy Sika herd that is actively managed for quality and resilience
- Meaningful access enabling high-quality hunting experiences
- Longevity in the ecosystems & their habitats
- The provision of sustainable food for families & communities
- Generational connection to the land and hunting traditions
- Opportunities for social networks

### 3. Forward

Seek amendment to place herd and hunting values first, with conservation outcomes such as healthy native flora framed as a result of well-managed herds.

### 4. Introduction & Purpose

Amendments to reflect hunters values and recognise that sustainable herd management contributes to ecological improvement when paired with adaptive monitoring.

### 5. Key Parties

Oppose DOC as the implementation lead and support implementation by the Game Animal Council, with the Sika Foundation delivering operational work.

### 6. Values & Key Context

Recognition of the value hunters and communities have through their contribute to conservation through active management.

### 7. Objectives

Replace objectives with those that implement:

- Herd health and trophy potential
- Provide for high-quality hunting experiences
- Improve ecological conditions through targeted management and robust monitoring.
- Prioritise hunter and community involvement

## 8. Strategies

Replace “control” with “management.” Ensure monitoring measures herd health, hunter satisfaction, and browse impacts.

## 9. Annual Planning & Reporting

Remove unnecessary bureaucracy

## 10. Summary

The Sika HOSI is an opportunity to strengthen both hunting values, including but not limited to family growth & conservation outcomes through hunter-led adaptive management. I am very thankful for the opportunity to have these submissions heard, as all deer including Sika play a vital role in my families development.

Kindest regards,

Kieran Reeve

# Nikki Riley - Horizons Regional Council

Submission Details

5<sup>th</sup> December 2025



Department Of Conservation  
PO Box 10420  
Wellington 6143

*BY EMAIL: [WILDANIMALMANAGEMENT@DOC.GOVT.NZ](mailto:WILDANIMALMANAGEMENT@DOC.GOVT.NZ)*

**Attention: Herds Of Special Interest Consultation Submissions**

Tēnā koutou,

**RE: LETTER IN SUPPORT OF REGIONAL SECTOR SUBMISSION**

On behalf of Horizons Regional Council, I wish to express our support for improving the management of deer as they have serious impacts on biodiversity values and primary industry across our region.

As part of Te Uru Kahika we recognise the increasing biosecurity risks facing our country and the growing pressures that established pest species place on our biodiversity, primary production sector, and local communities. Our council, like others across the motu, has heard clearly from communities that reducing the impacts of deer is a priority.

We acknowledge the intent behind the Herd of Special Interest (HOSI) proposals and the goal of Sika deer management to also provide benefits to the forest ecosystem. However, from a regional sector perspective, several areas require further development to ensure the proposals achieve their stated outcomes and align with broader biosecurity and biodiversity objectives.

**Consistency with Biodiversity Goals**

Horizons overarching interest is the reduction of pest animal numbers to support the recovery and resilience of ecosystems; across both private and crown land. It will be essential that the HOSI plans do not inadvertently promote the long-term maintenance of deer populations for recreational hunting at the expense of biodiversity outcomes.

**Integration with Other Pest Control Operations**

Effective deer management cannot be undertaken in isolation. Coordination with programmes such as OSPRI's TB control operations, including the use of 1080, must be assured to avoid conflicts or operational barriers.

### **Potential Impacts on Wider Conservation Work**

We remain concerned that increased focus and funding demands associated with the HOSI could divert DOC resources from other essential pest, predator, and weed management efforts. Programmes such as wilding conifer control and deer management, particularly in the Kawekas and Ruahines must not be compromised. Horizons currently works with the Department both as partners in the management of wilding conifer control and jointly funding old mans beard control; both these programmes require more funds to do anything more than hold a line. Any re-prioritisation of the current Departments resources to the HOSI could come at a significant cost to an already underfunded conservation estate.

### **Implications for Adjacent Landowners**

We encourage further consideration of how the HOSI boundaries interact with neighbouring private land. Several landowners are currently experiencing high pest animal pressures, and adjustments—such as maintaining a minimum buffer—may be necessary to prevent unintended consequences or conflicts.

### **Clarity of Roles and Responsibilities**

At present, the draft plans do not clearly outline who will lead decision-making, who will be responsible for delivery, how programmes will be funded, or how monitoring and reporting will be undertaken. Transparency in these areas is essential for public confidence, accountability, and effective implementation.

### **Partnership with Iwi, Hapū and Māori**

We strongly support early, ongoing, and meaningful collaboration with iwi, hapū, Māori, and Treaty settlement entities within the rohe of the proposed HOSI areas. Their involvement should be embedded throughout planning, operational decision-making, and review processes.

### **Long-Term Funding and Monitoring**

Sustained and secure funding will be critical to achieving the outcomes that our communities expect. We also support establishing a robust, independent monitoring framework to assess progress, inform adaptive management, and provide confidence in the efficacy of the programme.

### **Review Process**

The review requirements under the Game Animal Council Act are not sufficiently defined. We recommend that reviews include public consultation and that a full review, including public input, be required at least every 10 years.

In closing, Horizons Regional Council are neutral in its support of the proposals and welcome continued engagement to ensure the plans are refined, adequately resourced, and aligned with regional and national biodiversity and biosecurity objectives. We appreciate the opportunity to provide a regional perspective and look forward to ongoing collaboration.

Ngā mihi nui,

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

Nikki Riley JP, BBS, MInstD  
**Chair**  
**Horizons Regional Council**

s9(2)(a)

## Submitter 131

Submission Details

## Eirwen Harris Mitchell

---

**From:** s9(2)(a)  
**Sent:** Sunday, 7 December 2025 10:26 pm  
**To:** sikaHOSIHMP  
**Subject:** Sika HOSI and HMP submission  
**Attachments:** RR Sika Submission.docx

**Categories:** Green Category

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Hi,  
Please find attached submission as above.

Please note name and details not for public records.

Thank you

s9(2)(a)  
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## SIKA HOSI and HMP Submission

### Details of submitter

- Name: s9(2)(a)
- Region; s9(2)(a)
- Email: s9(2)(a)

**Name and details not to be publicly available**

### **I support the Sika HOSI**

### **I support the Herd Management Plan with the ammendments recommended below**

This herd and hunting matter to me because:

- They have been an inherent part of our local national park area during my life time; and is a quintessential part of the NZ dna
- They are a valuable food source particularly at a time when the cost of food has increased so significantly and shows no sign of abating
- Hunting provides significant mental and physical wellbeing to community members
- Hunting provides livelihoods for guides
- I would like hunting and this herd to be available to future generations
- I would like to see a practical solution to prioritise the interests of hunting and accepting that based on research to date positive ecological improvements outcomes will follow, particularly given the attempts to eradicate these introduced species has been ineffectual and policies precluded sustainable management.

### **Forward (page 3)**

#### **I seek that the plan is amended so :**

- i.the herd and hunting values I have set out above, are recognised first ; and
- ii. that the ‘adaptive management ‘ approach is proposed and the reasons for this; and
- iii. that the positive ecological and habitat outcomes through the sustainable management of the herd are recognised as an outcome of implementation of the HMP.

This sets the HMP up for clarity and connection of the values, through to the objectives , strategies and outcomes.

### **1.Introduction and Purpose of the Plan (page 4)**

**I seek that the plan is amended to :**

i. reflect the values above, and

ii. describe briefly what the 'adaptive management' approach is and that based on the research to date and the ongoing monitoring proposed the conservation/ecological outcomes result from the sustainable management of the herd;

that these are included within the Introduction to the plan, and its Purpose.

**Key parties and relationships relevant to this plan** page 5

**Oppose** - Department of Conservation implementation of the Sika Herd Management Plan on behalf of the Minister for Hunting and Fishing.

Implementation functions should be designated to the Game Animal Council as the statutory entity, with on the ground implementation by the Sika Foundation.

Funding should also follow the responsibility for implementation.

## **2.Values and Key Context**

**Hunting and recreation values** (page 10 and 11)

Support with amendments to include the herd and hunting values noted above.

## **Objectives and Strategies**

Support with significant amendment: I support the existence of objectives and strategies. Overall I found I could not readily connect the values to these objectives and then to the strategies which means a real risk of 'setting up to fail' through a mismatch and/or differing interpretations.

I support this section with a significant amendment to have crystal clear connection between the values, objectives and strategies. The objectives and strategies, must have a clear nexus to the adaptive management strategy as a priority and a recognition that sustainable management of the herd leads to improved indigenous vegetation outcomes.

**Objectives** (page 13)

**The proposed Objectives are opposed** and we seek that they be deleted and replaced by Objectives that reflect the values of the herd and hunting values for example:

- Adaptive management
- Sika animals are healthy;
- Hunter and community involvement in management of the herd is prioritised;

- Access for hunting is enhanced;
- Trophy potential is maximised where possible.

## **Strategies** (pages 13 – 16)

### **General** (page 13)

1.1 Oppose and seek deletion

1.2 Support with amendment (b) protects and enhances the hunting experience ~~during the sika rut;~~

1.3 Oppose and delete

### **Herd management Hunts** (page 14)

Support with one amendment 11.1(c) c) contribute to animal ~~control management~~ activities. Seek that all reference to “~~control~~” in the plan is replaced by “~~management~~”

### **Undertake Monitoring and Research to support management and decision making** (page 14 and 15)

Monitoring should directly relate to the objectives ie monitoring for ecological impacts of deer, herd health, hunter satisfaction, hunter harvest, access.

2.1 (a) Support in part. For ecological monitoring amend so that monitoring is directly related to potential deer browse and delete ~~Faecal pellet counts~~

2.1 (b) Delete reference to the conservation boards, and include Game Animal Council.

2.1 (c) Delete “~~including the hunter contribution to control targets~~”

2.1 (e) Monitoring hunter satisfaction support with amendment. Delete “~~with the management of the Sika Herd of Special Interest~~” . This is because hunter satisfaction is related to quality of the animals, hunter harvest, hunting experience and access.

2.2 Amend to include “~~using industry agreed best practice~~” and delete “~~in accordance with relevant standards used or set by the Department of Conservation~~”

### **Research** (page 15)

2.6 Amend to include “~~(d) Hunter harvest and satisfaction~~”

### **Undertake annual planning and reporting on management activities**

#### **Annual operational plan** (page 16)

Amend to replace “~~control~~” with “~~management~~”

5.1 (a) Delete “~~including the sex ratio of Sika~~” [ it is sufficient to just refer to annual management targets]

### **Annual Report** (page 16)

Replace “~~control~~” with “~~management~~”

# Karla Rix-Trott

Submission Details

## Eirwen Harris Mitchell

---

**From:** David Owen  
**Sent:** Tuesday, 16 December 2025 9:33 am  
**To:** sikaHOSIHMP; wapitiHOSIHMP  
**Subject:** FW: Commission: CORM | JMC-1050: Herds of Special Interest proposal

**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](http://www.doc.govt.nz)



---

**From:** Karla Rix-Trott  
**Sent:** Sunday, 7 December 2025 12:49 PM  
**To:** Hon James Meager ; Hon Tama Potaka ; Hon Penny Simmonds ; Rt Hon Christopher Luxon  
**Subject:** JMC-1050: Herds of Special Interest proposal

Dear Ministers,

I am writing to express my opposition to this proposal. Deer are not native animals and cause major damage to the understory of our native forests greatly affecting their long term regeneration and the well being of the native birds, bats, skinks and insects that inhabit them. This proposal is at odds with efforts throughout the country to eliminate deer to preserve the health of our forests especially in our national parks.

I am happy for continued efforts to cull them for food and to enable local and visiting hunters to shoot them but to deliberately foster their presence in our national parks as would occur under this proposal is an anathema and counters all the principals of conservation.

Your faithfully  
Karla Rix-Trott

s9(2)(a)

# Anaru Shadbolt - Te Tira Whakamātaki

Submission Details

## Eirwen Harris Mitchell

---

**From:** Anaru Shadbolt s9(2)(a)  
**Sent:** Monday, 8 December 2025 12:58 pm  
**To:** sikaHOSIHMP  
**Cc:** s9(2)(a) s9(2)(a) s9(2)(a) s9(2)(a)  
**Subject:** Submission on the Sika Deer Herd of Special Interest  
**Attachments:** Sika submission - Final.pdf  
**Categories:** Green Category

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Tena koe,

Please find attached that Te Tira Whakamātaki submission on the Draft herd management plan for proposed sika deer Herd of Special Interest. If there are any issues with the accessing of this file then please reach out and let me know.

Mauri ora,

### Anaru Shadbolt

he/him

Kairuruku Rauhi & Ihirangi Matihiko  
Digital Content & Engagement Coordinator



**To:**

Department of Conservation,  
Whare Kaupapa Atawhai/Conservation House  
PO Box 10420  
Wellington 6140  
Attn: Sika HOSI draft HMP submissions



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

Whatungarongaro te tāngata, toitū te taiao

**From:**

Te Tira Whakamātaki  
48 Church Street  
Rangiora 7400  
North Canterbury

s9(2)(a)

Contact: Melanie Mark Shadbolt, CEO

## Executive Summary

1. Te Tira Whakamātaki opposes the designation of a Sika Herd of Special Interest and the Draft Herd Management Plan in full.
2. The proposal represents a significant shift away from conservation first principles and toward a model that privileges recreational hunting and commercial outcomes on public conservation land. This shift threatens biodiversity, erodes Treaty responsibilities, and undermines the purpose and integrity of the conservation estate.
3. The proposed management plan relies on legislative changes that have been widely criticised by scientific experts, political parties, and the New Zealand Conservation Authority. The select committee report on the Herds of Special Interest Amendment Bill confirms this legislation removes key conservation safeguards and creates unresolved conflicts between hunting interests and conservation obligations.
4. Sika deer are an introduced species responsible for extensive ecological damage. DOC's own documents acknowledge widespread browsing impacts, compromised canopy regeneration, and long-term degradation in both Kaimanawa and Kaweka Forest Parks.
5. The plan elevates hunting outcomes above ecological restoration and above the responsibilities that iwi and hapū carry as kaitiaki. The approach described in the plan is inconsistent with mātauranga, whakapapa centred environmental practice, and the values held by many mana whenua who express deep concern about degraded ngahere, declining taonga species, and reduced ability to exercise kaitiakitanga.
6. The plan does not deliver credible conservation outcomes. It lacks measurable ecological targets, relies on the same recreational hunting approaches that have already failed to restore forest health, and sets out an adaptive management structure that prioritises herd quality and hunting satisfaction rather than ecosystem integrity.
7. Te Tira Whakamātaki recommends that the proposed designation is not progressed, that the Draft Plan is withdrawn, and that the Crown instead works with mana whenua to develop Indigenous led approaches to ungulate management that restore ecosystem function and whakapapa-based relationships, rather than perpetuating colonial hunting frameworks.

## **1. Introduction**

Te Tira Whakamātaki is an independent Māori environmental organisation focused on kaitiakitanga, biosecurity, and the protection of Aotearoa’s taonga species and ecosystems. Our work supports iwi, hapū, and Māori communities to exercise rangatiratanga over lands, waters, and biodiversity.

We oppose the Draft Herd Management Plan because it represents another step in the wider Herds of Special Interest programme that we opposed in our submission to the Environment Committee on the Game Animal Council (Herds of Special Interest) Amendment Bill. That submission detailed the ecological, legal, and cultural risks of introducing mechanisms that give formal protection to invasive deer within the conservation estate. Those same concerns apply to this plan and are magnified by the scale of the area proposed for designation.

## **2. Core Legal and Conservation Concerns**

### *2.1 The plan’s foundation conflicts with conservation law and purpose*

The select committee report confirms that Herds of Special Interest require explicit legislative amendments to override the National Parks Act requirement to exterminate introduced species as far as possible. This shows that the HOSI model is structurally incompatible with conservation principles.

Kaimanawa and Kaweka Forest Parks are held for the primary purpose of protecting native ecosystems for present and future generations. Introducing a hunting-based management framework into these areas undermines these statutory purposes and erodes the role of the New Zealand Conservation Authority by shifting decision making to the Minister for Hunting and Fishing.

### *2.2 Hunter led management cannot achieve ecological recovery*

DOC’s own material confirms that sika have caused major shifts in vegetation structure, including the replacement of palatable understorey by unpalatable species and the failure of canopy regeneration at multiple sites.

Research and operational experience show that recreational hunting alone is unable to reduce deer populations to levels necessary for forest regeneration. The Kaweka Mountain Beech Project demonstrated that only intensive aerial control resulted in canopy closure within ecologically meaningful timeframes, while recreational hunting resulted in very slow or no regeneration despite decades of effort

The Draft Plan does not set ecological density thresholds, regeneration requirements, or browse limits. Instead, it focuses on maintaining low but persistent populations of sika to

improve the hunting experience. This approach is inconsistent with ecological restoration and even with the department's own description of the impacts of deer.

### *2.3 The plan sets out a hunting strategy rather than a conservation strategy*

The plan's objectives centre on:

- enhancing the sika hunting experience
- improving herd quality
- ensuring older male stags are available for trophy hunting
- generating revenue and sponsorships
- promoting hunter tourism

These objectives are embedded throughout the plan's strategies. They do not align with conservation outcomes, nor do they satisfy the legislative requirement to give effect to Treaty principles.

The plan formally embeds industry priorities into conservation governance by directing DOC and mana whenua to work with the Game Animal Council and the Central North Island Sika Foundation to deliver herd quality improvements and hunting access opportunities.

## **3. Ecological Evidence of Harm**

### *3.1 Sika deer continue to degrade forest health*

The documents acknowledge:

- widespread loss of palatable species
- long term suppression of canopy regeneration
- high densities of sika in remote areas due to limited hunter access
- high levels of browsing damage indicated by monitoring data
- slow and costly recovery processes that require intensive control, not population maintenance

Ecological monitoring methods proposed in the plan, such as seedling ratio index and permanent plot monitoring, are essential for tracking harm. Yet the plan does not commit to achieving ecological improvements. It aims only to demonstrate whether the herd management approach is being delivered, not whether ecosystems are recovering.

### *3.2 The plan institutionalises ongoing ecological damage*

Maintaining a male biased population for hunter satisfaction and trophy quality ensures a permanent browsing footprint across the Sika Area. The plan itself acknowledges that

even low-density sika populations can prevent regeneration of preferred species in deer accessible sites.

This contradicts conservation science, climate resilience planning, and obligations to protect native species that evolved without ungulates.

#### **4. Treaty of Waitangi and Cultural Concerns**

##### *4.1 The plan does not uphold Treaty principles*

The plan acknowledges mana whenua interests but does not provide shared authority or decision-making power. Instead, iwi and hapū are invited to participate in a framework already designed to achieve herd and hunting outcomes.

This is inconsistent with section 4 of the Conservation Act, which requires the Crown to give effect to Treaty principles, including tino rangatiratanga, active protection, and partnership.

The select committee report also highlights that the amendment bill weakens the role of the NZCA, a key body for ensuring public interest and protecting Treaty related conservation responsibilities

##### *4.2 The plan perpetuates colonial conservation structures*

Te Tira Whakamātaki has consistently argued that approaches to invasive species must align with whakapapa-based responsibilities and Indigenous knowledge systems. A hunting driven approach that protects an invasive ungulate in areas of cultural significance undermines these responsibilities.

Mana whenua have expressed deep concern about the degraded state of these forests and the impacts of deer on taonga species. The plan does not address these concerns. Instead, it continues the colonial tradition of entrenching introduced species for recreational use on Indigenous land without Indigenous consent.

#### **5. Concerns with Governance and Process**

##### *5.1 The enabling legislation lacks an evidence base*

The disclosure statements reproduced in the select committee report confirm that the Bill had no inquiry based or research-based foundation. There was no impact analysis, and no scientific or conservation rationale provided for advancing the HOSI mechanism. This is an extraordinary departure from evidence based environmental policy making.

Building the Sika Herd Management Plan on this legislative foundation produces the same weaknesses, conflicts, and governance failures.

## *5.2 Conflicts with DOC's conservation responsibilities*

The Green Party dissenting view highlights significant operational conflicts for DOC, including challenges with pest control tools, deer repellent use, and the risk that conservation operations might be restricted to protect hunting interests. This introduces unacceptable risks to climate resilience, biodiversity protection, and DOC's ability to act as kaitiaki on behalf of the public.

## **6. Alternative Approaches**

Indigenous led conservation models already exist in Aotearoa, including the Raukumara Pae Maunga approach and the principles within Maranga Ake Ai. These models restore ecological health while restoring relationships, and they demonstrate the success of Indigenous governance rather than industry led frameworks.

Translocation, controlled breeding outside the conservation estate, and reduced densities of deer across forest parks are all viable alternatives that align with conservation priorities rather than replacing them.

## **7. Recommendations**

Te Tira Whakamātaki recommends that:

- 7.1. The Minister for Hunting and Fishing does not designate a Sika Herd of Special Interest.
- 7.2. The Draft Herd Management Plan is withdrawn.
- 7.3. The Crown reaffirms the purpose of Kaimanawa and Kaweka Forest Parks as conservation lands where introduced browsers are reduced to protect native ecosystems.
- 7.4. Any future ungulate management frameworks are grounded in Treaty partnership and mātauranga Māori, with shared authority and decision making for mana whenua and honour existing treaty settlements.
- 7.5. The Herds of Special Interest mechanism developed under the Game Animal Council Act is repealed or significantly reformed to align with conservation law, Treaty obligations, and science based ecological management.
- 7.6. Conservation funding is restored and strengthened, given the biodiversity crisis identified in submissions to the select committee.
- 7.7. Full World Heritage impact assessments are required before any proposal that alters management of conservation land in ways that elevate introduced species

## **8. Conclusion**

The Draft Sika Herd of Special Interest Management Plan represents an unprecedented departure from established conservation principles, ecological evidence, and Treaty responsibilities. It proposes to manage an invasive browser for hunting and commercial gain within protected forests that already show significant signs of ecological degradation.

The supporting legislative framework has been widely criticised for its lack of evidence, erosion of conservation safeguards, and conflicts with democratic oversight and Indigenous rights. The plan itself fails to deliver meaningful environmental protections and instead embeds a hunting centric management approach that will prolong and deepen ecological harm.

Te Tira Whakamātaki urges the Crown to uphold kaitiakitanga, tikanga, and the responsibilities of Tiriti partnership by rejecting this plan and working with mana whenua to design Indigenous led approaches that heal both ecosystems and relationships.

Nā mātou

**Melanie Mark Shadbolt**

Tumu Whakarae, Chief Executive Officer

Te Tira Whakamātaki

# Grant Sheridan - Hunting & Fishing NZ

Submission Details

**8 December 2025**

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

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

## **Draft Herd Management Plan – Sika HOSI**

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### **Hunting & Fishing New Zealand**

1. This submission is on behalf of Hunting & Fishing New Zealand.
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 with over 130,000 followers on social media.
3. 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

### **Overview**

4. As a hunting, fishing, outdoor and sporting goods retailer, Hunting & Fishing New Zealand 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.
5. Hunting & Fishing New Zealand supports and works closely with the hunting sector and recognises 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.

6. Hunting & Fishing New Zealand 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.
7. Hunting & Fishing New Zealand supports initiatives that promote hunters, hunter values and the contribution that hunters make across New Zealand.
8. Hunting & Fishing New Zealand supports the designation and implementation of Herds of Special Interest (HOSI).
9. Hunting & Fishing New Zealand 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.
10. Hunting & Fishing New Zealand 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.
11. Hunting & Fishing New Zealand 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.
12. Hunting & Fishing New Zealand 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.
13. Hunting & Fishing New Zealand submits that the HOSI framework provides an opportunity to drive national economic growth by enabling more active promotion and management of the herd, increasing value recognition of the herd, and realising the associated benefits.
14. Hunting & Fishing New Zealand 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.

<b>1 Introduction</b>	
<b>Overriding considerations</b>	<ul style="list-style-type: none"> <li>- 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.</li> <li>- 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.</li> </ul>
<b>2 Values and key context</b>	
<b>Position</b>	<b>Recommendation</b>
<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 relationship they hold with the herd and the Kaimanawas and Kawekas.</p>	<ul style="list-style-type: none"> <li>- Frame the draft plan in the following order: <ol style="list-style-type: none"> <li>1. Herd and hunting values</li> <li>2. Conservation / stewardship values</li> <li>3. Mana whenua values</li> <li>4. Community values</li> </ol> </li> <li>- Remove all reference to control and replace with management or adaptive management.</li> <li>- Separate and redraft the sections to better outline the values.</li> <li>- 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 &amp; wellbeing, economic and conservation.</li> </ul>
<b>3 Objectives and Strategies</b>	
<b>Commentary</b>	
<p>Hunting &amp; Fishing 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>	

	<b>Position</b>	<b>Recommendation</b>
<b>Objective 1</b>	Oppose  This objective is too general, impractical and cannot be monitored.	- <b>Objective 1</b> should only relate to Sika impacts management. This objective should only be for Sika management and not a system management objective.
<b>Objective 2</b>	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.
<b>Objective 3</b>	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.
<b>Objective 4</b>	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'.
<b>Objective 5</b>	-	-
<b>Objective 6, 7, 8</b>	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.
<b>Objective 9</b>	Oppose as this is not an Objective, it is an administrative procedure.	- The requirement to report should be further down the HMP.

<b>Strategies</b>		
<b>General</b>		
	<b>Position</b>	<b>Recommendation</b>
1.1	This section needs to be reframed to increase the recognition of the values of the herd.	- The Strategies need to focus on herd health and the habitat through sustainable management.

	<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>	
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 &amp; Fishing New Zealand that hunt Sika deer all year round and value them for meat, experience, family time, recreation, mental health &amp; wellbeing and the enjoyment of getting into the backcountry.</p>	<ul style="list-style-type: none"> <li>- 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:</li> <li>- Amend 1.2 a) prioritise areas for management activity.</li> <li>- Amend 1.2 b) protects and enhances the Sika hunting experience.</li> </ul>
1.3	<p>Oppose as 1.3 is too vague and is captured in 1.2</p>	<ul style="list-style-type: none"> <li>- Reframe to provide specifics (to avoid misinterpretation), or remove 1.3.</li> </ul>
<b>General recreational hunting</b>		
	<b>Position</b>	<b>Recommendation</b>
General	<p>What is not clearly outlined within the Plan is if fees will be charged for the hunting of Sika deer within the HOSI.</p> <p>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.</p>	

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.
<b>Herd management hunts</b>		
	<b>Position</b>	<b>Recommendation</b>
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'.
<b>Professional control activities</b>		
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	- Amend 1.14 to, Recover venison from sika removed as part of professional herd

	appropriate for a HMP and remove passive terminology.	management operations where efficiency and effectiveness are not compromised.
<b>Monitoring</b>		
	<b>Position</b>	<b>Recommendation</b>
2.1	<p>Support with amendments.</p> <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>	<ul style="list-style-type: none"> <li>- Amend 2.1 a) Remove faecal pellet counts.</li> <li>- Amend 2.1b) Add the Game Animal Council and remove Conservation Boards.</li> <li>- Amend for provisions to be made for new monitoring tools and methods and the need to validate to ensure consistency of results.</li> <li>- Submit that 2.1 c) is amended from 'control targets' to 'herd management' as game animals are a valued introduced species.</li> </ul>
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</p>	<ul style="list-style-type: none"> <li>- Amend 2.2 to, Undertake ecological monitoring in accordance with best practice methods and standards.</li> </ul>

	methods used in countries who have longstanding involvement and understanding in game animal management developed over many years.	
<b>Research</b>		
	<b>Position</b>	<b>Recommendation</b>
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.	<ul style="list-style-type: none"> <li>- 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.</li> </ul>
<b>Partnerships</b>		
	<b>Position</b>	<b>Recommendation</b>
4.1	<p>Support with amendments.</p> <p>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.</p>	<ul style="list-style-type: none"> <li>- Amend 4.1 to remove the words 'associated with Sika'.</li> </ul>
<b>Stewardship</b>		
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.	<ul style="list-style-type: none"> <li>- Amend 4.4 to Provide a range of opportunities for the hunting community and other interested parties to actively contribute to sika herd management.</li> </ul>
4.5	Support	
4.6	Support	
4.7	Support with amendments to make 4.7 more action orientated.	<ul style="list-style-type: none"> <li>- Amend 4.7 to, Provide a range of opportunities for the hunting community and other interested parties to</li> </ul>

		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.
<b>Annual operational plan</b>		
	<b>Position</b>	<b>Recommendation</b>
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	- Delete 5.4

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

Yours sincerely

**Grant Sheridan**  
Chief Executive Officer  
Hunting & Fishing New Zealand

s9(2)(a)

s9(2)(a)

## Eirwen Harris Mitchell

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**From:** Grant Sheridan s9(2)(a)  
**Sent:** Monday, 8 December 2025 7:31 pm  
**To:** sikaHOSIHMP  
**Cc:** s9(2)(a)  
**Subject:** HFNZ Submission  
**Attachments:** HF NZ - Draft Herd Management Plan Sika HOSI - FINAL.pdf  
**Categories:** Green Category

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

Please find attached the HFNZ submission on the draft herd management plan for the SIKa HOSI.

Best regards

Grant Sheridan

**Grant Sheridan**  
**Chief Executive Officer**



**HuntfishCo Co-operative NZ Ltd**  
(Trading as – Hunting & Fishing)

**Auckland Office:**  
Stanway Business Park  
646 Great South Road, Ellerslie, Auckland  
Tower 1, Level 2

E s9(2)(a)

M: s9(2)(a)

**Palmerston North Office:**  
9 Mathews Ave, Palmerston North  
P.O.Box 4472. PN 4442  
New Zealand

# Nicholas Singers

Submission Details

## SUBMISSION ON THE SIKA HERD OF NATIONAL SIGNIFICANCE

Nicholas Singers

s9(2)(a)

s9(2)(a)

Email: s9(2)(a)

28<sup>th</sup> November 2025

Dear Hon Ministers Potaka (Minister of Conservation) and Hon Meager (Minister of Hunting and Fishing),

I oppose a Sika Herd of National Significance being designated over the western and southern Kaimanawa Ranges.

This is because doing so would be inconsistent with the policies to protect Ecological Management Units (Labelled as 'Significant Habitats' identified within Map 5 of the Kaimanawa Forest Park Management Plan 2007 (Figure 1) and therefore is inconsistent with the Game and Animal Council Act 2013 and the Wild Animal Control Act 1977.

Before designating a herd of special interest, the minister is required to consider any overriding considerations. This has not been evaluated with the proposed Sika Herd of Special Interest Management Plan.

The Game Animal Council Act 2013 says the following:

*Section 16 Minister may designate herds of special interest*

- (a) *the Minister considers that—*
  - (iii) *management of the animals for hunting purposes is consistent with the **overriding considerations***
- (b) *the Minister has regard to—*
  - (i) *the **purposes of the Wild Animal Control Act 1977**; and*
  - (ii) *the **status of the land, particularly the designation of the land as a conservation area, national park, or reserve; and***
  - (iii) *the **overriding considerations***

*Section 19 Herd management plans*

- (4) *Herd management plans must be consistent with the **overriding considerations**.*

A herd of significant management plan also needs to be consistent with the Wild Animal Control Act 1977 particularly:

*Section 4 Wild animals to be controlled*

(2) *This Act shall be administered, having regard to the general purposes specified in subsection (1), so as to—*

**(a) ensure concerted action against the damaging effects of wild animals on vegetation, soils, waters, and wildlife;**

The objectives of the Ecological Management Areas within the Kaimanawa Forest Park Management Plan (2007) are:

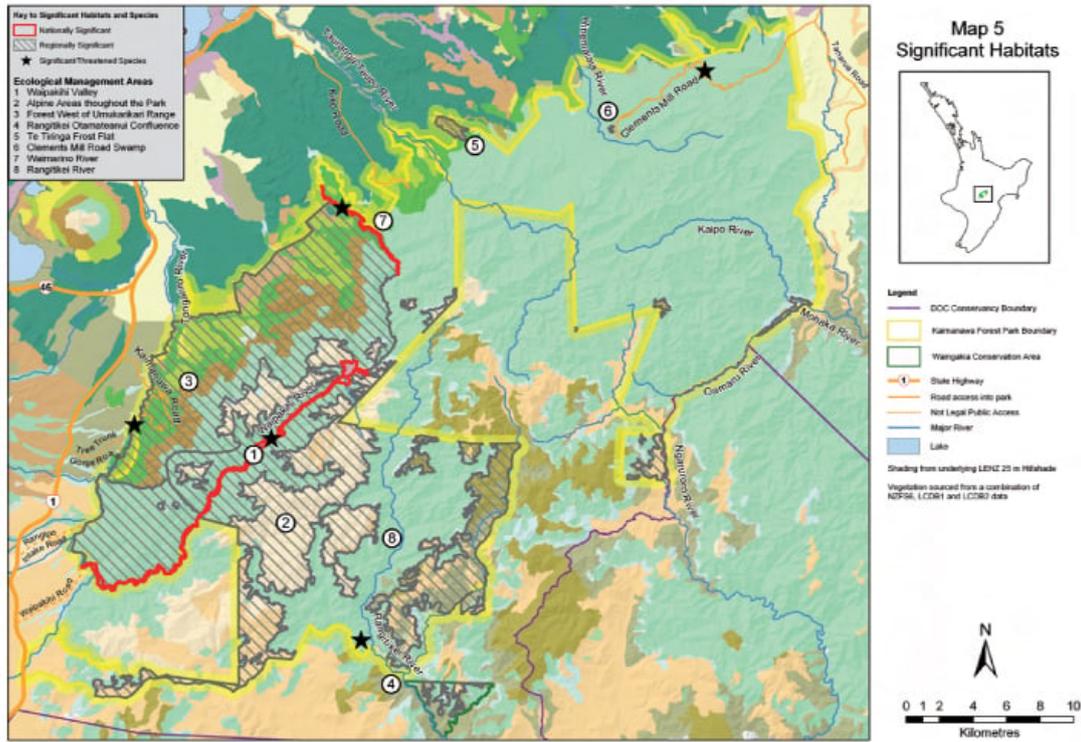
- a To protect the park's ecological Management Areas (EMAs) from plant and animal pests in order to retain their defining biological features.*
- b To improve ecosystem health within ecological Management Areas disturbed by human-induced activities.*
- c To manage the park as part of an interconnected ecological network within the region.*

This plan section states:

*'Active management of biodiversity is a fundamental requirement of effective park management. This will be achieved through an **integrated** Kaimanawa Forest Park Management Plan **site-led management approach (where a range of management activities occur, including pest/weed control and species management)** that prevents further fragmentation and addresses major plant and animal pest incursions. **The ecological Management Areas, are identified sites for this approach.**'*

This explanation could not be clearer. The purpose of the plan identifying ecological management areas is to protect the most important ecological values present within the park. I consider that the 'Significant Habitats' identified in Map 5 of the Kaimanawa Forest Park Management Plan (2007) constitute overriding considerations and thus the Department and the Minister of Conservation, must take this into account when designating a Herd of Special Interest.

**Figure 1: Kaimanawa Forest Park Management Plan Map of Ecological Management Units**



Ecological Management Units should be managed consistent with section 4 (2) (a) of the Wild Animal Control Act 1997 AND consistent with the Kaimanawa Forest Park Management Plan (2007), to protect the ecological values present in perpetuity.

I understand that 21,294 hectares of the Kaimanawa Forest Park, called the Kaimanawa Mountains – Umukarikari (Figure 2) is also a national Ecosystem Management Unit. DOC's description of Ecosystem Management Units (DOC 2025) is:

*'DOC Ecosystem Management Units cover areas of public conservation land identified by DOC as sites that represent a full range of New Zealand ecosystems.*

*Ecosystem Management Units are places identified as important for management because of the types and condition of the ecosystems and species there. They are usually quite large and often include groups of related ecosystems, which are managed together. Many also include threatened species. As a Government agency, DOC is focused on managing for outcomes. The first outcome (1) is: The diversity of our natural heritage is maintained and restored. Six objectives sit under this outcome specifying where effort will be directed (1.1 - 1.6). Ecosystem management units fall under objective 1.1 A full range of New Zealand's ecosystems is conserved to a healthy functioning state.'*

The 21,294 hectare Kaimanawa Mountains – Umukarikari EMU has the greatest diversity of ecosystem types and threatened species in the Kaimanawa Ranges. At the lowest altitude rimu, matai, kāmahī forest occurs which is a critical habitat for threatened fauna such as NI kaka and kakariki. With an increase in altitude these forests transition to red beech, kāmahī forest with miro being the most common podocarp tree, though locally significant areas of mountain tōtara still occur. Within increasing altitude this then transitions to mountain beech forest which reaches the tree line and dominates throughout much of the Waipakihi Valley. Mid-Waipakihi Valley is a more diverse area of beech forest that survived the 232 AD Taupo eruption, which includes red beech, silver beech and mountain beech. Above the treeline the area includes the best condition subalpine tussock grasslands within the park including snow tussock and red tussock. The Waipakihi Valley contains some of the best remaining high country river flat ecosystems in the North Island including areas natural short tussock, red tussock, frost flat scrub and montane/ subalpine wetlands. In 1986 two parts of this area were approved in principle as ecological areas (though never gazetted by DOC); Waiotaka of 6,020 hectares and the Waipakihi of 1210 hectares

This area still contains most native forest native birds remaining in the North Island, including NI kaka, Yellow crowned kakariki, brown kiwi, whio, riflemen, NI robin, long tailed cuckoo, karearea along with long-tailed bats, short-tailed bats, beech mistletoes, white mistletoe, dactylanthus and a number of other herbaceous

threatened plants.



The conservation goal of ecological management units is 'high ecological integrity'. This means maintaining biodiversity and enhancing populations of pest vulnerable as well as threatened species. It is not to manage deer to an arbitrary level, based on a supposed win: win situation, to provide high quality deer and allow (some) less vulnerable canopy species to regenerate. These goals are ecologically in conflict with each other.

Part of the Kaimanawa Mountains – Umukarikari ecological management unit has had repeat aerial 1080 operations, first starting in 1995. I understand by local DOC staff that this area is on the list of site to receive an aerial 1080 operation in 2026/2027 financial year. This is essential conservation management to protect a wider range of ecological values present in this management unit, than deer control can achieve alone. Without this, common species such as kāmahī and mountain tōtara will die from possum browse like elsewhere in New Zealand (Allen *et al.* 2002). Further, there is no hope in protecting threatened species such as long tailed bats, short tailed bats, kaka, and kiwi without this scale of predator management. I consider that because deer die in aerial 1080 operations (Nugent *et al.* 2001 and Nugent & Yockney 2004), sometimes at high levels (>67%, Morriss *et al.* 2020). This pest control method has previously reduced deer abundance in the Waitotaka catchment (part of this site) (Forsyth *et al.* 2013), continued use for conservation outcomes, is mutually exclusive to having a herd of special interest.

Whilst the proposed Sika Herd of Special Interest Management Plan proposes sika deer control in these areas, the level that deer need to be controlled to, to achieve high ecological integrity is much lower than optimal levels for herd management. This is because, for numerous tree species present such as kāmahī, silver beech and broadleaf, deer need to be controlled and maintained to very low levels in perpetuity. The trial of deer control in 3600 hectare area in part of the Kaimanawa Mountains – Umukarikari ecological management unit using aerial 1080 and aerial shooting did not allow kāmahī seedlings and epicormic shoots to grow (Cieraad *et al.* 2015), despite deer being at relatively low levels (Forsyth *et al.* 2013).

New Zealand and European forest ecologists have learnt from multiple regeneration studies that to allow palatable trees to regenerate, deer density needs to be very low, c. 1 - 2 deer per km<sup>2</sup> (Tanezap *et al.* 2009; Husheer & Tanentzap 2024). This target is not that dissimilar of 2 - 4 per km<sup>2</sup>, which is considered to be the historical (natural) abundance throughout their North American Range (cited in Rooney 2001). In Scotland regeneration of pine woodlands typically occurs below 5 per km<sup>2</sup> (Beaumont *et al.* 1995) and a target of 4 per km<sup>2</sup> is recommended for pine forestry regeneration (Gill and Morgan 2010). In the Cairngorms National Park in the Scottish Highlands, regeneration of the trees was monitored for 30 years in association with culling deer. Scott's pine regenerated when deer were suppressed below < 4 deer per km<sup>2</sup>, but the more palatable aspen and rowan required much lower levels of 1.9 per km<sup>2</sup> (Gullett *et al.* 2023). The recommended deer control targets by New Zealand authors are very similar to these. Further they are also consistent with the modelled population

densities for species of moa in mountain areas of the South Island, of 0.5 to 3 per km<sup>2</sup>, prior to human arrival (Latham *et al.* 2020).

Given the limited long term studies in New Zealand, which have successfully shown palatable forest regeneration as a result of sustained deer control (Nugent *et al.* 1987; Husheer & Robertson 2005; ), I consider that application of the precautionary principle is required. For the 21,294 hectare Kaimanawa Mountains – Umukarikari Management Unit, a target of < 2 deer per km<sup>2</sup> fits with this approach. This would mean fewer than 425 deer across the 21,294 hectare management unit.

Management of large forest EMU's to a healthy and functional state needs to include control of possums, red deer, sika deer, feral pigs and predators to very low levels. Given the scale of the western and southern Kaimanawa Ranges, the only efficient and effective wild animal control method to achieve this is regular aerial 1080 operations. This should also be supplemented by helicopter and ground based control of ungulates and localised predator control where threatened species populations occur.

### **Summary**

Designating all of Kaimanawa Forest Park a Sika HOSI is inconsistent with the obligations of the Game and Animal Council Act 2013, which is required to consider overriding considerations within the Kaimanawa Forest Park Management Plan 2007. There needs to be a more equitable balance between protecting ecological values and enabling game management. Designating all of the Kaimanawa Forest Park as a Sika HOSI is not a balanced approach.

Since the Kaimanawa Forest Park Management Plan 2007, the Department of Conservation has made massive advances in the scale of predator control operations. This was written at a time when large landscape projects were uncommon. For example, the Department recently managed predators across 113,898 hectares of South Westland (Abbey Rocks, 48,582 hectares, Barn Bay to Big Bay (Hope-Cascade – 65,314 hectares).

There is no equivalent landscape scale ecological management unit project in the Central North Island, yet the ecological values are quite comparable. Further there is considerable risk of widescale forest collapse if management does not occur.

I advocate that designating the Sika HOSI is more appropriate in the red beech forest in the north of the park which is where most Sika hunting occurs and because red beech forest is considerably less vulnerable to deer impacts AND that the Department of Conservation amalgamates all of the Kaimanawa Ecological Management units with the Kaimanawa Remote experience zone (Figure 3) into a larger 41,200 hectare ecological management unit. This is more balanced approach.

Better ecological management of this 41,200 hectare ecological management unit would possibly arrest forest collapse of mountain beech, mountain tōtara, silver beech



## References

- Allen, R., Stewart, G., & Rogers, G. (2002). Maintenance of key tree species. [Maintenance of key tree species](#)
- Beaumont, D., Dugan, D., Evans, G., Taylor, S. (1995). Deer management and tree regeneration in the RSPB Reserve at Abernethy Forest. *Scottish Forestry* 49, 155–161.
- Cieraad, Ellen; Easdale, Tómas; Richardson, Sarah. (2015). Effects of deer on kamahi regeneration in Kaimanawa Forest Park 2008 2013. Landcare Research. Prepared for the Department of Conservation, Taupō, New Zealand
- DOC. (2007). Kaimanawa Forest Park Management Plan Map 5. [map5-kfp-plan-p112.jpg \(529×778\)](#)
- DOC. (2025). DOC Ecosystem Management Units. [DOC Ecosystem Management Units | DOC Open Spatial Data](#)
- Forsyth, D. M., Ramsey, D. S., Veltman, C. J., Allen, R. B., Allen, W. J., Barker, R. J., ... & Todd, C. R. (2013). When deer must die: large uncertainty surrounds changes in deer abundance achieved by helicopter-and ground-based hunting in New Zealand forests. *Wildlife Research*, 40(6), 447-458.
- Gullett, P. R., Leslie, C., Mason, R., Ratcliffe, P., Sargent, I., Beck, A., ... & Hancock, M. H. (2023). Woodland expansion in the presence of deer: 30 years of evidence from the Cairngorms Connect landscape restoration partnership. *Journal of Applied Ecology*, 60(11), 2298-2308.
- Husheer, S. W., & Robertson, A. W. (2005). High-intensity deer culling increases growth of mountain beech seedlings in New Zealand. *Wildlife Research*, 32(4), 273-280.
- Husheer, S. W., & Tanentzap, A. J. (2024). Hunting of sika deer over six decades does not restore forest regeneration. *Journal of Applied Ecology*, 61(1), 134-144.
- Latham, A. D. M., Latham, M. C., Wilmshurst, J. M., Forsyth, D. M., Gormley, A. M., Pech, R. P., ... & Wood, J. R. (2020). A refined model of body mass and population density in flightless birds reconciles extreme bimodal population estimates for extinct moa. *Ecography*, 43(3), 353-364.
- Morriss, G.A., Parkes, J.P., Nugent, G. (2020) Effects of aerial 1080 operations on deer populations in New Zealand. *New Zealand Journal of Ecology* 44(2): 3417.
- Nugent, G., Parkes, J. P., & Tustin, K. G. (1987). Changes in the density and distribution of red deer and wapiti in northern Fiordland. *New Zealand journal of ecology*, 11-21.
- Nugent, G., Fraser, K. W., Asher, G. W., and Tustin, K. G. (2001). Advances in New Zealand mammalogy 1990–2000: Deer. *Journal of the Royal Society of New Zealand*

31, 263–298.

Nugent, G., & Yockney, I. (2004). Fallow deer deaths during aerial- 1080 poisoning of possums in the Blue Mountains, Otago, New Zealand. *New Zealand Journal of Zoology*, 31(2), 185-192.

Rooney, T. P. (2001). Deer impacts on forest ecosystems: a North American perspective. *Forestry*, 74(3), 201-208.

Putman, R., Langbein, J., Green, P., & Watson, P. (2011). Identifying threshold densities for wild deer in the UK above which negative impacts may occur. *Mammal Review*, 41(3), 175-196.

Tanentzap, A. J., Burrows, L. E., Lee, W. G., Nugent, G., Maxwell, J. M., & Coomes, D. A. (2009). Landscape- level vegetation recovery from herbivory: progress after four decades of invasive red deer control. *Journal of Applied Ecology*, 46(5), 1064-1072.

# Agamjot Singh

Submission Details

## Eirwen Harris Mitchell

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**From:** Agamjot Singh [s9(2)(a)]  
**Sent:** Friday, 12 December 2025 2:41 pm  
**To:** wapitiHOSIHMP; SikaHerdOfSpecialInterest@doc.govt.nz  
**Subject:** Submission on the Draft Wapoti Herd of Special Interest (HOSI) Management Plan  
And my Submission on the Draft Sika Herd of Special Interest (HOSI) Management Plan.

**Categories:** Green category

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

Agamjot Singh, [s9(2)(a)]

Submission on the Draft Wapoti Herd of Special Interest (HOSI) Management Plan

And my Submission on the Draft Sika Herd of Special Interest (HOSI) Management Plan.

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.

Ngā mihi nui.

# Nicky Snoyink - Forest & Bird NZ

Submission Details

## Eirwen Harris Mitchell

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**From:** Nicky Snoyink [s9(2)(a)]  
**Sent:** Monday, 8 December 2025 5:14 pm  
**To:** sikaHOSIHMP  
**Subject:** Sika HOSI HMP Forest & Bird Submssion  
**Attachments:** F&B Submission Sika HOSI HMP 08122025.pdf

**Categories:** Green Category

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

Good afternoon,

Please find attached Forest & Bird's submission on the Sika Herd of Special Interest draft herd management plan.

Thank you for the opportunity to submit.

Kind regards,  
Nicky



# Forest & Bird

TE REO O TE TAIAO | *Giving Nature a Voice*

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## Sika Herd of Special Interest – Draft Herd Management Plan – November 2025

8 December 2025

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

From: Royal Forest & Bird Protection Society Inc (Forest & Bird)  
Amelia Geary – Regional Conservation Manager  
s9(2)(a)

### Introduction

1. Forest & Bird is New Zealand’s largest independent conservation organisation. Our mission is to protect New Zealand’s unique flora and fauna and its habitat.
2. Thank you for the opportunity to provide feedback on the Draft Herd Management Plan for sika (hereon referred to as the Draft Plan).
3. Forest & Bird opposes Herds of Special Interest (HOSI). HOSIs represent duplication of bureaucracy, prioritise hunting interests of a minority over the public good, and protect a pest species on public conservation land that risks undermining pest control elsewhere.
4. Forest & Bird opposes the designation of sika as a HOSI. The Department of Conservation (DOC) already has tools to manage sika deer in the Kaimanawa and Kaweka Forest Parks, including by community agreements established under the Conservation Act 1987. A HOSI is not needed.
5. Legitimising the presence of an introduced pest species like sika for the purpose of hunting will not help restore forest regeneration and will most likely result in further long-term degradation of already badly affected native ecosystems. The focus instead should be on co-ordinated collective action to deal with the devastating impacts that expanding populations of introduced wild animals are having on economic productivity and on the natural environment.
6. According to s19(3) of the Game Animal Council Act the purpose of a Herd Management Plan (HMP) is to set out objectives and strategies for the management of a herd of special interest to

achieve the expected benefits provided for under s16(3)(e). The benefits are those expected to be gained by managing the animals for hunting purposes.

7. In the Foreword to the Draft Plan, the Minister of Hunting and Fishing has made clear his expectation:

*“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.”<sup>1</sup>*

It is through this lens that Forest & Bird will address each part of the Draft Plan in our submission.

## **SUBMISSION**

### **Foreword**

8. The Minister has made it clear in the Foreword that he expects there to be a range of benefits from managing sika for hunting purposes, however nowhere in the Draft Plan or the consultation support document are these benefits explicitly described. The benefits are proposed to be set out in future in a Gazette notice. This is not appropriate. It is inappropriate to write a HMP that does not address the purpose of the HOSI. Without clear benefits set out, we cannot be sure that the Objectives and Strategies in the Draft Plan will achieve the outcomes sought. The Draft Plan should address this.
9. Evidence based benefits, including a cost benefit analysis to justify HOSI, should be set out in its own section in the HMP, not by a vague note in the HMP foreword. This would help the public understand the value proposition of HOSI and the Minister’s rationale for gazetting the HOSI (if they decide to do so) so the public can appropriately comment on the benefits and determine whether the proposal can be supported.

### **Introduction**

#### Purpose of this Plan

10. As above, the benefits expected to be gained by managing this herd of deer for hunting purposes are unclear. Forest & Bird does not agree that this HMP provides for responsive and adaptive management because management cannot adapt effectively in the absence of clearly defined benefits.

#### Key parties and relationships relevant to this Plan

11. The Draft Plan should set out how it was developed and will be interpreted and administered to give effect to the principles of the Treaty of Waitangi.
12. Forest & Bird objects to the Central North Island Sika Foundation (CNISF) being 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.<sup>2</sup> There is no

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<sup>1</sup> Page 3. Foreword to the Sika Herd of Special Interest – Draft Herd Management Plan.  
<https://www.doc.govt.nz/contentassets/d2ab98d7d3764733bf2033c61de29b55/sika-herd-of-special-interest-draft-herd-management-plan.pdf>

<sup>2</sup> Page 6. Sika Herd of Special Interest – Draft Herd Management Plan.

transparency regarding delivery. The Draft Plan implicitly grants the CNISF exclusive access to taxpayer funding for sika management and does not provide any indication that other groups could be given the opportunity to deliver this work.

13. The CNISF estimates the annual operational cost of the proposed HOSI to be between \$823,000 and \$917,000 in the first five-year period.<sup>3</sup> This estimate does not indicate value for money. The Draft Plan provides no indication that there will be a tender process, no indication that DOC will consider WARO providers, and no indication that Treaty Partners will be offered this opportunity. The Draft Plan must clearly set out a transparent process for delivery of the outcomes to determine who will undertake the work, not the other way around.

### Values and key context

14. This section has some useful context but the whole section needs to be reduced to one page. A HMP needs to be about management, not extensive information about the sika herd and the Sika Foundation. In our view, mention of the Sika Foundation is inappropriate and should be removed, based on our comments above.

### Objectives and Strategies

#### Objectives

15. The Introduction states that HOSI can 'be managed for hunting purposes while ensuring that conservation values continue to be protected.'<sup>4</sup> There is a vast body of scientific research regarding the impacts of introduced browsing animals on New Zealand's conservation values.<sup>5</sup> Scientific evidence shows that for New Zealand's native ecosystems to recover, introduced browsing animals need to be maintained at lowest possible numbers or excluded completely. In the case of Kaweka and Kaimanawa Forest Parks specifically, there is a plethora of scientifically robust evidence regarding the impacts of sika on the Forest Parks and on the dominant forest type, the mountain beech.<sup>6</sup>
16. The negative impact of deer browsing on forest regeneration in the Kaweka Range has been known for decades.<sup>7</sup> Sika deer browsing has reduced the density and height of palatable indigenous seedlings (e.g. kāmahi, three finger, and broadleaf) and suppressed the

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<sup>3</sup> Page 7. Briefing: sika HOSI proposal. <https://www.doc.govt.nz/globalassets/documents/about-doc/oia/2025/25-b-0097-briefing-sika-hosi-proposal.pdf>

<sup>4</sup> Page 4. Introduction to the Sika Herd of Special Interest – Draft Herd Management Plan.

<sup>5</sup> See Appendix 1 Research Reference List

<sup>6</sup> For example: [Allan & Allen 1997. Mountain beech forest dynamics in the Kaweka Range and the influence of browsing animals. Science For Conservation: 44.](#)

[Husheer et al 2003. Long-term influences of introduced deer on the composition and structure of New Zealand \*Nothofagus\* forests. Forest Ecology and Management. 181:99-117.](#)

[Husheer & Robertson 2005. High-intensity deer culling increases growth of mountain beech seedlings in New Zealand. Wildlife Research. 32:273-280.](#)

[Husheer et al 2006. Suppression of regeneration in New Zealand mountain beech forests is dependent on species of introduced deer. Biological Invasions. 8:823-834.](#)

[Latham et al 2015. Seasonal patterns of resource selection by introduced sika deer \(\*Cervus nippon\*\) in Kaweka Forest Park Recreational Hunting Area, New Zealand. New Zealand Journal of Ecology. 39\(2\): 0-0.](#)

[Husheer & Tanentzap 2024. Hunting of sika deer over six decades does not restore forest regeneration. Journal of Applied Ecology. 61: 134-144.](#)

<sup>7</sup> [Allan & Allen 1997. Mountain beech forest dynamics in the Kaweka Range and the influence of browsing animals. Science For Conservation: 44.](#)

regeneration of indigenous beech forest (mountain, red and silver beech).<sup>8</sup> The history of hunting effort, both recreational and commercial, in Kaweka Forest Park has not led to forest recovery.<sup>9</sup> To protect the conservation values and allow palatable trees to regenerate, deer density needs to be reduced to c. 1 - 2 deer per km<sup>2</sup>.<sup>10,11</sup>

17. The Objectives fail to reflect the evidence that *hunting alone does not control sika sufficiently to protect conservation values*. For example, the literature is clear that regeneration is not happening in Kaweka and Kaimanawa Forest Parks, therefore ‘maintenance’ in Objective 1 is not a suitable objective as it implies the forest is in sufficiently good health that ‘maintenance’ is a desirable outcome.
18. Forest & Bird is concerned that in drafting this HMP, DOC has failed to use any of the scientific evidence of the impacts of sika on native ecosystems and the efficacy of ‘managing the animals for hunting purposes’. The Objectives need to be completely re-written to align with the evidence and not compete with one another, to ensure they are fit for purpose.
19. To enable adaptive management, the Plan needs an overarching specific, measurable, achievable, relevant, time-bound (SMART) ecological objective. Without a specific ecological goal, it is difficult to measure success. This is a vital component of adaptive management.

### Strategies

20. Forest & Bird understood DOC’s expectation to be that professional aerially assisted culling would need to be the primary population management method in the first few years of HOSI implementation.

*This is because many management units are overpopulated currently, and we know that voluntary hunting efforts are not sufficient to address this on their own. We understand the CNISF generally accepts this, and we are confident we’ll be able to strike the right balance of management approaches in the herd management plan.*<sup>12</sup>

However, Forest & Bird does not consider this has been achieved in the Draft Plan.

21. For example, Strategy 1.13 states:

Undertake professional control operations *where recreational hunting and herd management hunts are insufficient* to maintain a sika population that achieves the objectives of this Plan. [our emphasis]

It is not clear whether these professional control operations are to be conducted aerially. There is no mention anywhere in the Draft Plan that aerial culling is to be undertaken, at all. Forest & Bird is concerned that this omission prioritises an ineffective management technique over one known to be effective. This has not ‘struck the right balance’ in our opinion. The scientific

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<sup>8</sup> [Husheer et al 2006. Suppression of regeneration in New Zealand mountain beech forests is dependent on species of introduced deer. Biological Invasions. 8:823-834.](#)

<sup>9</sup> [Husheer & Tanentzap 2024. Hunting of sika deer over six decades does not restore forest regeneration. Journal of Applied Ecology. 61: 134-144.](#)

<sup>10</sup> [Tanentzap et al 2009. Landscape-level vegetation recovery from herbivory: progress after four decades of invasive red deer control. Journal of Applied Ecology. 46: 1064-1072.](#)

<sup>11</sup> [Husheer & Tanentzap 2024. Hunting of sika deer over six decades does not restore forest regeneration. Journal of Applied Ecology. 61: 134-144.](#)

<sup>12</sup> Page 6. Briefing: Sika HOSI proposal. <https://www.doc.govt.nz/globalassets/documents/about-doc/oia/2025/25-b-0097-briefing-sika-hosi-proposal.pdf>

evidence suggests that deer may need to be eliminated from a forest for decades to restore forest regeneration and, once that is achieved, only a deer population controlled to low density may be compatible with ongoing regeneration.<sup>13</sup> Such reductions can be achieved through commercial harvesting and government-funded culling. This needs to be reflected in the Strategy.

22. Concerningly, DOC considers it likely to take some time before the CNISF can attract the amount of voluntary labour they indicate they need;<sup>14</sup> this creates further impetus for professional operators undertaking the work up front. The Strategies regarding the range of tools to manage the sika HOSI need to be hierarchical to ensure it's clear which are priority tools to achieve the conservation benefits of managing the herd for hunting purposes.
23. Forest & Bird is also concerned that the monitoring strategies in 2 are also not reflective of the latest evidence. For example, the proposed methods while tried and tested, have been assessed in Fiordland as unable to provide a definitive answer on the efficacy of current management activities to deliver on existing ecological outcomes.<sup>15</sup> The unreliability of monitoring methods like faecal pellet counts is reiterated from Kaweka Forest Park.<sup>16</sup>
24. An effective monitoring method should be able to detect anticipated changes in what is being measured. Forest & Bird expects at the very least, a robust monitoring framework tied to a measurable ecological goal be clearly outlined in the Draft Plan.
25. Forest & Bird strongly opposes Strategy 5.1. By deferring the setting of control targets to an 'Annual Operational Plan,' the HMP asks the public to sign a blank cheque. A statutory management plan must set hard environmental limits (e.g., maximum population density or specific vegetation recovery thresholds) within the Plan itself.
26. Without pre-defined 'bottom lines' in the HMP, the actual number of pests allowed in the Sika Area will be decided annually behind closed doors, without the public scrutiny afforded to a statutory plan. This does not provide certainty, accountability, or credibility.

## **Compliance, review and enforcement**

### Plan compliance and review

27. The compliance and review section lacks detail, particularly regarding what occurs if the HMP fails to achieve its objectives. Forest & Bird considers that compliance must relate to delivering the outcomes, not merely reviewing the Plan. Amending the HMP after five years to shift expectations is inappropriate; clear expectations regarding achievement of the Plan must be set from the outset.
28. This sika HOSI presents significant liability for DOC and the Game Animal Council. This is because the CNISF will not be legally responsible for the implementation of the HMP.

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<sup>13</sup> [Tanentzap et al 2009. Landscape-level vegetation recovery from herbivory: progress after four decades of invasive red deer control. \*Journal of Applied Ecology\*. 46: 1064-1072.](#)

<sup>14</sup> [Page 6. Briefing: Sika HOSI proposal. <https://www.doc.govt.nz/globalassets/documents/about-doc/oia/2025/25-b-0097-briefing-sika-hosi-proposal.pdf>](https://www.doc.govt.nz/globalassets/documents/about-doc/oia/2025/25-b-0097-briefing-sika-hosi-proposal.pdf)

<sup>15</sup> [Whitehead et al 2024. The effects of deer control on alpine plant browse in Fiordland National Park from 2006-2024. \*Manaaki Whenua – Landcare Research. Contract Report: LC4545.\*](#)

<sup>16</sup> [Husheer & Tanentzap 2024. Hunting of sika deer over six decades does not restore forest regeneration. \*Journal of Applied Ecology\*. 61: 134-144.](#)

*DOC and/or the GAC will be statutorily responsible (acting on behalf of the Minister) and will therefore need to be prepared to cover the full cost of the necessary operations should the need arise.<sup>17</sup>*

29. Therefore, this part must clearly set out that DOC retains the ability to carry out wild animal control operations, particularly where ecological objectives are not met. This must include a timeframe, as set out above, by the inclusion of an overarching SMART ecological goal and when DOC must step in and take back control to ensure that goal is achieved.

#### **Sika Herd of Special Interest compliance and enforcement**

30. Schedule 1 of the Game Animal Council Act does not clearly specify what constitutes an offence. Forest & Bird considers that this approach will discourage participation at a time when encouraging maximum participation in herd reduction is important.

#### **Conclusion**

31. Forest & Bird considers this Sika Herd of Special Interest – Draft Herd Management Plan falls short. Forest & Bird strongly opposes the designation of sika as a Herd of Special Interest in the Kaimanawa and Kaweka Forest Parks. The focus instead, should be on co-ordinated, collective action to deal with the devastating impacts that expanding populations of introduced wild animals are having on economic productivity and the environment.

#### **Recommendation**

32. We recommend that you do not designate sika as a Herd of Special Interest in the Kaimanawa and Kaweka Forest Parks.

Thank you very much for the opportunity to provide feedback on the Sika Herd of Special Interest – Draft Herd Management Plan. We hope that you will find our feedback useful.

Forest & Bird wishes to be heard.

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<sup>17</sup> Page 8. Briefing: Sika HOSI proposal. <https://www.doc.govt.nz/globalassets/documents/about-doc/oia/2025/25-b-0097-briefing-sika-hosi-proposal.pdf>

## APPENDIX 1 Research Reference List

- Allen, R. And Allan, C. (1997). Mountain beech forest dynamics in the Kaweka Range and the influence of browsing animals. *Science For Conservation*: 44.
- Allen, K., Bellingham, P. J., Richardson, S. J., Allen, R. B., Burrows, L. E., Carswell, F. E., Husheer, S. W., St. John, M. G., & Peltzer, D. A. (2023). Long-term exclusion of invasive ungulates alters tree recruitment and functional traits but not total forest carbon. *Ecological Applications*, 33(4), e2836. <https://doi.org/10.1002/eap.2836>
- Allen, R. B., Forsyth, D. M., MacKenzie, D. I., & Peltzer, D. A. (2023). Robustness of field studies evaluating biodiversity responses to invasive species management in New Zealand. *New Zealand Journal of Ecology*, 47(1), 3503. <https://doi.org/10.20417/nzjecol.47.8>
- Allen, R. B., Payton, I. J., & Knowlton, J. E. (1984). Effects of ungulates on structure and species composition in the Urewera forests as shown by exclosures. *New Zealand Journal of Ecology*, 7, 119–129.
- Bengsen, A. J., Forsyth, D. M., Latham, A. D. M., McLeod, S. R., & Pople, A. R. (2022). Effectiveness and costs of helicopter-based shooting of deer. *Wildlife Research*, 49(8), 729–740. <https://doi.org/10.1071/WR21122>
- Bengsen, A. J., Forsyth, D. M., Harris, S., Latham, A. D. M., McLeod, S. R., & Pople, A. (2023). A systematic review of ground-based shooting to control overabundant mammal populations. *Wildlife Research*, 50(11), 880-895. <https://doi.org/10.1071/WR19129>
- Bennett, A., Fedrigo, M., & Greet, J. (2022). A field method for rapidly assessing deer density and impacts in forested ecosystems. *Ecological Management & Restoration*, 23(3), 326–333. <https://doi.org/10.1111/emr.12518>
- Blossey, B., Hare, D., & Waller, D. M. (2024). Where have all the flowers gone? A call for federal leadership in deer management in the United States. *Frontiers in Conservation Science*, 5, 1–12. <https://doi.org/10.3389/fcosc.2024.1377119>
- Carswell, F. E., Holdaway, R. J., Mason, N. W. H., Richardson, S. J., Burrows, L. E., Allen, R. B., & Peltzer, D. A. (2015). *Wild Animal Control for Emissions Management (WACEM) research synthesis* (Landcare Research Contract Report No. LC 1687). Manaaki Whenua – Landcare Research.
- Clarkson, B.D. (2022). Reversing Biodiversity decline in Aotearoa New Zealand. *Policy Quarterly* 18 (2): 61-70.
- Comte, S., et al. (2025). Impacts of Recreational Hunting on an Introduced Population of Fallow Deer (*Dama dama*) in Tasmania, Australia. *Ecological Management & Restoration*, 26(1). (Early online publication) <https://doi.org/10.1111/emr.12685>
- Coomes, D. A., Allen, R. B., Forsyth, D. M., & Lee, W. G. (2003). Factors Preventing the Recovery of New Zealand Forests Following Control of Invasive Deer. *Conservation Biology*, 17(2), 450–459.

<https://doi.org/10.1046/j.1523-1739.2003.01406.x>

Côté, S. D., Rooney, T. P., Tremblay, J.-P., Dussault, C., & Waller, D. M. (2004). Ecological Impacts of Deer Overabundance. *Annual Review of Ecology, Evolution, and Systematics*, 35, 113–147. <https://doi.org/10.1146/annurev.ecolsys.35.021103.105725>

Cowan, P. (2016). *A review of feral goats as contributors to erosion and the benefits of goat control* (Landcare Research Contract Report No. LC2520). Manaaki Whenua – Landcare Research.

Cruz, J., Thomson, C., Parkes, J. P., Gruner, I., & Forsyth, D. M. (2017). Long-term impacts of an introduced ungulate in native grasslands: Himalayan tahr (*Hemitragus jemlahicus*) in New Zealand's Southern Alps. *Biological Invasions*, 19(1), 339–349. <https://doi.org/10.1007/s10530-016-1283-2>

Department of Conservation. (2017). *Conserving Fiordland's biodiversity 1987-2015: The challenges, the achievements, the knowledge*. Department of Conservation.

Duncan, R. P., Ruscoe, W. A., Richardson, S. J., & Allen, R. B. (2006). *Consequences of deer control for Kaweka mountain beech forest dynamics* (Landcare Research Contract Report: LC0607/021). Manaaki Whenua – Landcare Research.

Fedrigo, M., Stewart, S. B., Greet, J., Bennett, A., & Forsyth, D. M. (2024). Modelling the spatial abundance of invasive deer and their impacts on vegetation at the landscape scale. *Biological Invasions*, 26, 1901–1918. <https://doi.org/10.1007/s10530-024-03282-w>

Figgins, H., & Holland, P. (2012). Red deer in New Zealand: Game animal, economic resource, or environmental pest? *New Zealand Geographer*, 68(1), 36–48. <https://doi.org/10.1111/j.1745-7939.2012.01219.x>

Forsyth, D. M., Barker, R. J., Morriss, G., & Scroggie, M. P. (2013). When deer must die: large uncertainty surrounds changes in deer abundance achieved by helicopter- and ground-based hunting in New Zealand forests. *Wildlife Research*, 40(6), 447–458. <https://doi.org/10.1071/WR13098>

Forsyth, D. M., Coomes, D. A., & Nugent, G. (2003). *Framework for assessing the susceptibility of management areas to deer impacts*. Science for Conservation 213. Department of Conservation.

Forsyth, D. M., Pople, A. R., & Nugent, G. (2023). Ecology impacts and management of wild deer in Australia. *Wildlife Research*, 50(11), 831–851. <https://doi.org/10.1071/WR23097>

Forsyth, D. M., Ramsey, D. S. L., Veltman, C. J., Nicol, S. J., & Warburton, B. (2011). Long-term changes in the relative abundances of introduced deer in New Zealand estimated from faecal pellet frequencies. *New Zealand Journal of Zoology*, 38(3), 239–249. <https://doi.org/10.1080/03014223.2011.592200>

Forsyth, D. M., Wilmshurst, J. M., Allen, R. B., & Coomes, D. A. (2009). Impacts of introduced deer and extinct moa on New Zealand ecosystems. *New Zealand Journal of Ecology*, 33(1), 92–102.

Forsyth, D. M., Wilson, D. J., Easdale, T. A., Kunstler, G., Canham, C. D., Ruscoe, W. A., Wright, E. F., Murphy, L., Gormley, A. M., Gaxiola, A., & Coomes, D. A. (2015). Century-scale effects of invasive deer and rodents on the dynamics of forests growing on soils of contrasting fertility. *Ecological Monographs*, 85(2), 157–180. <https://doi.org/10.1890/14-0389.1>

Forsyth, D. M., Wilson, D. J., Ruscoe, W. A., & Batcheler, C. L. (2010). Population dynamics and resource use of red deer after release from harvesting in New Zealand. *New Zealand Journal of Ecology*, 34(2), 159–171.

Holdaway, R. J., Burrows, L. E., Carswell, F. E., & Marburg, A. E. (2012). Potential for invasive mammalian herbivore control to result in measurable carbon gains. *New Zealand Journal of Ecology*, 36(2), 252–264.

Husheer, S.W., Coombes, D.A., and Robertson, A.W. (2003). Long-term influences of introduced deer on the composition and structure of New Zealand *Nothofagus* forests. *Forest Ecology and Management*. 181:99-117.

Husheer, S. W. (2007). Introduced red deer reduce tree regeneration in Pureora Forest, central North Island, New Zealand. *New Zealand Journal of Ecology*, 31(1), 79–87.

Husheer, S. W., Allen, R. B., & Robertson, A. W. (2006). Suppression of regeneration in New Zealand mountain beech forests is dependent on species of introduced deer. *Biological Invasions*, 8, 823–834. <https://doi.org/10.1007/s10530-005-4011-x>

Husheer, S. W., Hansen, Q. W., & Urlich, S. C. (2005). Effects of red deer on tree regeneration and growth in Aorangi Forest, Wairarapa. *New Zealand Journal of Ecology*, 29(2), 271–277.

Husheer, S. W., & Robertson, A. W. (2005). High-intensity deer culling increases growth of mountain beech seedlings in New Zealand. *Wildlife Research*, 32(3), 273–280. <https://doi.org/10.1071/WR04006>

Husheer, S.W., Robertson, A.W., Coomes, D.A., & Frampton, C.M. (2006) Herbivory and plant competition reduces mountain beech seedling growth and establishment in New Zealand. *Plant Ecology*. 183 (2). 245-256.

Husheer, S. W., & Tanentzap, A. J. (2023). Hunting of sika deer over six decades does not restore forest regeneration. *Journal of Applied Ecology*, 60(12), 2638–2648. <https://doi.org/10.1111/1365-2664.14544>

Invasive Species Council. (2024, December). *Discussion Paper: Policy and Regulatory Issues in Treating Feral Deer in Victoria as a Vertebrate Pest Animal*. Invasive Species Council.

Latham, A. D. M., Cradock-Henry, N., Nugent, G., Warburton, B., & Byrom, A. (2012). *Wild ungulate impacts and management in lowland sites in Southland Region* (Envirolink medium advice grant 1033-ESRC242; Landcare Research Contract Report: LC1086). Manaaki Whenua – Landcare Research.

Latham, A. D. M., Herries, D., & Latham, M. C. (2015). Seasonal patterns of resource selection by introduced sika deer (*Cervus nippon*) in Kaweka Forest Park Recreational Hunting Area, New Zealand. *New Zealand Journal of Ecology*, 39(2), 291–302.

Latham, A. D. M., Latham, M. C., Norbury, G. L., Forsyth, D. M., & Warburton, B. (2020). A review of the damage caused by invasive wild mammalian herbivores to primary production in New Zealand. *New Zealand Journal of Zoology*, 47(1), 20–52. <https://doi.org/10.1080/03014223.2019.1689147>

Latham, A. D. M., & Nugent, G. (2017). Introduction, impacts, and management of non-native deer and other hunted ungulates in New Zealand. In A. T. H. Prins & I. J. Gordon (Eds.), *Invasion Biology and Ecological Theory*. CABI. (Specific source details require confirmation)

Malham, J. P., Elliott, G. P., & Walker, S. (2019). No evidence of negative effects of aerial 1080 operations on red deer (*Cervus elaphus*) encounters and sightings in South Westland forests. *New Zealand Journal of Ecology*, 43(2), Article 3364. <https://doi.org/10.20417/nzjecol.43.19>

Leathwick, John & Byrom, Andrea. (2023). The rise and rise of predator control: a panacea, or a distraction from conservation goals?. *New Zealand Journal of Ecology*. 10.20417/nzjecol.47.3515. DOI:[10.20417/nzjecol.47.3515](https://doi.org/10.20417/nzjecol.47.3515)

Miller, K. M., Perles, S. J., Schmit, J. P., Matthews, E. R., Weed, A. S., Comiskey, J. A., Marshall, M. R., Nelson, P., & Fischelli, N. A. (2023). Overabundant deer and invasive plants drive widespread regeneration debt in eastern United States national parks. *Ecological Applications*, 33(4), e2837. <https://doi.org/10.1002/eap.2837>

Moloney, P. D., Forsyth, D. M., Gormley, A. M., Allen, R. B., Canham, C. D., Wright, E. F., & Ramsey, D. S. L. (2021). Occupancy and relative abundances of introduced ungulates on New Zealand's public conservation land 2012–2018. *New Zealand Journal of Ecology*, 45(2), 3454. <https://doi.org/10.20417/nzjecol.45.24>

Morriss, G. A., Parkes, J. P., & Nugent, G. (2020). Effects of aerial 1080 operations on deer populations in New Zealand. *New Zealand Journal of Zoology*, 47(4), 296–313. <https://doi.org/10.1080/03014223.2020.1799176>

Nugent, G., & Choquenot, D. (2004). Comparing cost-effectiveness of commercial harvesting, state-funded culling, and recreational deer hunting in New Zealand. *Wildlife Society Bulletin*, 32(2), 481–492.

Nugent, G., & Fraser, K. W. (1993). Pests or valued resources? Conflicts in management of deer. *New Zealand Journal of Zoology*, 20(4), 359–362. <https://doi.org/10.1080/03014223.1993.10420359>

Nugent, G., et al. (2011). Policies and management of overabundant deer (native or exotic) in protected areas. *Biological Invasions*, 13(12), 2771–2786. <https://doi.org/10.1007/s10530-011-9989-y>

Sweetapple P.J. and Nugent, G. (2010) Seedling ratios: a simple method for assessing ungulate impacts on forest understories. *Wildlife Society Bulletin*. [https://doi.org/10.2193/0091-7648\(2004\)32\[137:SRASMF\]2.0.CO;2](https://doi.org/10.2193/0091-7648(2004)32[137:SRASMF]2.0.CO;2)

O'Bryan, C. J., Patton, N. R., Hone, J., Lewis, J. S., Berdejo-Espinola, V., Risch, D. R., Holden, M. H., & McDonald-Madden, E. (2021). Unrecognized threat to global soil carbon by a widespread invasive species. *Global Change Biology*, 27(21), 5564–5578. <https://doi.org/10.1111/GCB.15769>

Parkes, J. P., & Murphy, E. C. (2003). Management of introduced mammals in New Zealand. *New Zealand Journal of Zoology*, 30(4), 335–359. <https://doi.org/10.1080/03014223.2003.9518349>

Peltzer, D. A., & Nugent, G. (2023). *Review of the likely magnitude and manageability of deer impacts on carbon stores in indigenous forests* (Manaaki Whenua - Landcare Research Contract Report No. LC4327). Manaaki Whenua – Landcare Research.

Ramsey, D. S. L., Forsyth, D. M., Veltman, C. J., Richardson, S. J., Allen, R. B., Allen, W. J., Barker, R. J., Bellingham, P. J., Jacobson, C. L., Nicol, S. J., Robertson, A. W., & Todd, C. R. (2017). A management experiment reveals the difficulty of altering seedling growth and palatable plant biomass by culling invasive deer. *Wildlife Research*, 44(8), 623–636. <https://doi.org/10.1071/WR16206>

Russell, J. C. (2014). A comparison of attitudes towards introduced wildlife in New Zealand in 1994 and 2012. *Journal of the Royal Society of New Zealand*, 44(4), 187–206. <https://doi.org/10.1080/03036758.2014.981197>

Tanentzap, A. J., Burrows, L. E., Lee, W. G., Nugent, G., Maxwell, J. M., & Coomes, D. A. (2009). Landscape-level vegetation recovery from herbivory: progress after four decades of invasive red deer control. *Journal of Applied Ecology*, 46(5), 1064–1072. <https://doi.org/10.1111/j.1365-2664.2009.01683.x>

Whitehead, A.L., Rossignaud, L., & Peltzer, D.A. (2024) The effects of deer control on alpine plant browse in Fiordland National Park from 2006–2024. Manaaki Whenua Landcare Research. Contract Report: LC4545 prepared for the Department of Conservation.

Wilson, D. J., Ruscoe, W. A., Burrows, L. E., McElrea, L. M., & Choquenot, D. (2006). An experimental study of the impacts of understorey forest vegetation and herbivory by red deer and rodents on seedling establishment and species composition in Waitutu Forest, New Zealand. *New Zealand Journal of Ecology*, 30(2), 191–207.

Wright, D. M., Tanentzap, A. J., Flores, O., Husheer, S. W., Duncan, R. P., Wisser, S. K., & Coomes, D. A. (2012). Impacts of culling and exclusion of browsers on vegetation recovery across New Zealand forests. *Biological Conservation*, 153, 64–71. <https://doi.org/10.1016/j.biocon.2012.04.033>

Yamada, H., & Takatsuki, S. (2015). Effects of Deer Grazing on Vegetation and Ground-Dwelling Insects in a Larch Forest in Okutama, Western Tokyo. *International Journal of Forestry Research*, 2015, Article 687506. <https://doi.org/10.1155/2015/687506>

\*\*\* Submission Ends\*\*\*

# Rosalie Snoyink

Submission Details

## **Submission on Sika deer herd of special interest Draft Management Plan (the Plan).**

To: The Department of Conservation (DOC)  
Christchurch  
Email: [sikahosihmp@doc.govt.nz](mailto:sikahosihmp@doc.govt.nz)

Date: 5 December 2025

Submitter: R.J. Snoyink

Thank you, I am pleased to have the opportunity to provide feedback on the Sika HOSI Draft Management Plan in the Kaimanawa and Kaweka Forest Parks and the Kaweka Conservation Area. It does seem to me a step is missing though, as no opportunity has been given to the public to consult on HOSI designations on public lands. It is a giant leap from an idea to a Management Plan (the Plan). Therefore I take this opportunity to say I strongly support HOSI proposals on private and low status public land, NOT in National and Forest Parks and in high value Conservation areas where the effects of ungulate browsing will likely be irreversible.

My comments on the Plan are:

### **Section 1. Purpose of the Plan**

The Plan is deficient in that it does not contain the day-to-day details of the operational management. To comment fully we need to know how the Plan will work.

### ***Values and key context***

#### *Natural heritage and conservation values*

I support this section of the Plan which describes the geological history, the cultural, the natural heritage and conservation values of the Kaimanawa and Kaweka Forest Parks.

#### *Conservation and introduced species*

I agree with the section that describes the significant and long-lasting impacts of deer browsing and how biodiversity declines and changes in plant community composition can reduce ecological resilience, including resilience to the impacts of climate change.

The HOSI proposal should not be a “balancing” exercise where benefits go to recreational, trophy and commercial hunters and where conservation values are compromised. I do not agree that feral animals within a designated HOSI area should be treated any differently than a pest animal outside the area. The desired outcomes of better hunting and enhanced conservation values are not compatible. You can have a healthy herd, or a healthy regenerating forest, you can’t have both.

#### *Hunting and recreational values.*

I disagree with the statement *Managing the Sika Herd of Special Interest for hunting purposes involves focusing control efforts on sika hinds, which will have both environmental and hunting benefits.* I disagree with objectives and strategies that focus on improving

animal quality and enhancing the sika hunting experience. Forest Parks and high value conservation land should not be used for this purpose.

*Monitoring, research and reporting to support management*

The monitoring and enforcement section of the Plan lacks sufficient detail to provide assurance. A much more robust monitoring plan is required to be sure that maintenance and regeneration of indigenous vegetation is occurring. The monitoring methods and results should be part of a transparent process and knowledge shared with all interested parties. I do not support Adaptive Management as an adequate solution to address ongoing degradation of flora and fauna values. By the time the damage is fully recognised it may be too late for recovery and regeneration. The sika will win.

*Culture, heritage, community and stewardship values*

I recognise and acknowledge the Sika Foundation in its predator trapping work to protect native bird species, and maintaining recreational infrastructure in the area, but these efforts in no way qualify for designating HOSI in the Kaimanawa and Kaweka Forest Parks.

### **3. Objectives and Strategies**

The objectives and strategies are tipped to improving the sika hunting experience at the expense of conservation values. They are inadequate and incomplete. Hunter-led management does not work. No management of pest animal species should be delegated to Hunting Groups or the Game Animal Council.

Another gap in the Plan is how the HOSI will be funded. Monitoring will be a high cost and should be paid for by hunters. I oppose any public funding being used to improve the hunting experience on such high value public land. All public funding granted to the Game Animal Council and Hunting Groups should go to the Department of Conservation (DOC). There is an urgent need for full scale pest animal control to be co-ordinated by DOC, assisted by all the other tools we have, including the latest technologies, commercial and recreational hunters, iwi, farmers, foresters, conservation NGO's, philanthropists and other interested sectors of the community. This needs to happen not just in the Kaimanawa and Kaweka Forests but across NZ/Aotearoa.

**Outcome sought:**

I urge the Minister for Hunting to **decline** the sika HOSI proposal and work alongside all parties (not just hunters) to achieve robust protection and enhancement of our natural landscapes and unique biodiversity.

I wish to be heard in support of my submission.

R.J. Snoyink

## Eirwen Harris Mitchell

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**From:** s9(2)(a)  
**Sent:** Friday, 5 December 2025 2:50 pm  
**To:** sikaHOSIHMP  
**Subject:** Submission on Sika HOSI Management Plan Proposal - R.Snoyink  
**Attachments:** Submission on Sika deer herd of special interest Draft Management Plan.docx

**Categories:** Green Category

You don't often get email from s9(2)(a) [Learn why this is important](#)  
To the Department of Conservation  
Christchurch.

Please see attached submission on the Sika HOSI Management Plan Proposal from:  
Rosalie Snoyink

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