

Sika Herd Management Plan Submissions Record

Submission Attachments - submitter last names - Sp - W

Table of Contents

Speck, Walter (27)	1
Speedy, Cam (95) - Central North Island Sika Foundation	4
Stager, Ines (129)	10
Stroud, Andrew (249)	14
Swale, Benjamin (219)	17
Thurlow, Gwyn (226) - New Zealand Deerstalkers Association	21
Turner, Patrick (224)	33
Upton, Simon (164) - Parliamentary Commissioner for the Environment	38
Weir, Liz (130) - Mackenzie Guardians	41
Wereta, Danette (134) - Animal Justice Party	46

Walter Speck

Submission Details



Walter Speck

New Zealand

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New Zealand Parliament
Game Animal Council (Herds of Special Interest) Amendment Bill

Proposed Approach to the Management of Introduced Game Animals in New Zealand

Limitations of Eradication

The extermination of introduced animals in National Parks is neither possible nor financially viable. Attempts to return New Zealand to its original, prehuman state are utopian and ideology driven. Achieving complete elimination of introduced game animals is physically, politically, and financially unattainable. There is an argument that introduced game animals fill the ecological and practical roles once occupied by Moas and other species that historically served as food sources in New Zealand.

Development of a Management System

A new strategy is necessary—one that seeks to balance and manage animal populations rather than pursuing their total extinction. The primary objective should be the creation of a management system where introduced species deliver tangible benefits to the people of New Zealand. Hunting, fishing, and other nature-based activities should be encouraged and supported on all lands throughout the country, including National Parks. Hunters and hunting activities ought to play a central and active role in managing introduced game animals, contributing both through their direct involvement and financial support.

If certain species/areas need protection, then small areas should be selected, fenced and protected through control/trapping. Ensure survival of species through protection of small scale, safe habitats and breeding grounds. The large scale “protection” of landscapes to be abandoned.

The Value of Hunting

Hunting is a meaningful activity that supplies hunters, their families and communities with valuable food sources and encourages physical activity in natural surroundings. It fosters a deeper appreciation for nature and inspires a commitment to the continued protection of natural resources. Hunting also cultivates responsibility toward the environment and others and serves as an activity that strengthens mental health. Hunters fulfil an important role in NZ society; they are normally responsible, resilient and grounded citizens

Recommendation:

A change of policy. The current practice of exterminating game animals in National Parks is wasteful and motivated by ideology. This approach should be discontinued. Instead, introduced animals should be managed and controlled and treated as an asset.

Cam Speedy - Central North Island Sika Foundation

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/km² (Clements Mill Road sort of density). But if having broadleaf and five-finger in the understorey is required, deer density will need to be less than 1 or 2 Sika/km². This is not a proposition that will allow for hunting outcomes. Most highly palatable plant species are supremely adapted to growing as epiphytes, so they are not lost from the system – but an expectation they turn up in SRI monitoring in the 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', written in a cursive style.

John Cook
Sika Foundation President

Ines Stager

Submission Details

Eirwen Harris Mitchell

From: Ines Stäger s9(2)(a)
Sent: Sunday, 7 December 2025 4:08 pm
To: sikaHOSIHMP
Subject: Submission sika HOSI
Attachments: Sika Hosi submission.docx

Categories: Green Category

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

Please find my submission attached.

Ines Stäger, s9(2)(a) s9(2)(a) s9(2)(a)

Submitter: Ines Stäger
s9(2)(a)
s9(2)(a)
s9(2)(a)

To: Department of Conservation
P.O. Box 4715
Christchurch 8140

Submitted via email: sikahosihmp@doc.govt.nz

Geraldine 7. December 2025

Submission on the Sika Herd Management Plan

This submission is in opposition to Herds of Special Interest (HOSI), because of the detrimental impact these browsing animals have on our native ecosystems.

We have already lost considerable amounts of biodiversity values in our region due to ungulates roaming freely in public and private conservation areas.

We have observed the damage by deer in the Peel Forest Scenic Reserve over the last 40 years. Deer have killed substantial lancewood trees (*Pseudopanax lanceolatus*), with a trunk diameter of 30+ cm. They have ring barked five finger (*Pseudopanax arboreus*). Once the five finger had gone, deer targeted Broadleaf (*Griselinia littoralis*). There is very little regrowth of mid canopy species, except for a few plants that appear unpalatable to deer. The understorey is ferns with a few trees and literally no saplings that will grow to replace old trees of the forest because these are being eaten by ungulates. The interference of deer on our natural environment also affects native wildlife.

Peel Forest Scenic Reserve is just one of many protected areas which are negatively affected by ungulates.

New Zealand's native species are special; ungulates are introduced and are far from being special.

We are facing increased extinction of plant species, never experienced before. This also results in extensive habitat loss for fauna.

Comments on the Management Plan

- The Plan lacks ecological objectives to achieve environmental protection. Ecological targets need to be set before a plan is finalised.
- Adaptive management will not work without clear ecological objectives and strategies.

- The strategy is very vague, due to the absence of an operational plan.
- No details are provided for the monitoring provisions. To be effective, robust monitoring techniques are needed to “*improve natural biodiversity and prevent the loss of native species from their current range.*”
- Enforcements provisions are inadequate. The safety net is absent. Who will step up if HOSI fails?
- The Plan clearly benefits hunters as set out in the Plan, there appears to be no benefit to the public.
- Significant damage occurs even at low numbers of ungulates.
- As taxpayers we are subsidising an industry that is not interested in reducing the resource.
- Monitoring and enforcement should be paid for by hunters (not taxpayers).
- Landscape scale pest control should not be restricted by HOSI.
- Traditional recreational use of National Parks should not be restricted by hunting activities.
- If a HOSI plan is adopted, regular reviewing is a pre-requisite.

I wish to be heard and receive updates on the process.

A handwritten signature in black ink, appearing to read 'Friger'.

Andrew Stroud

Submission Details

Eirwen Harris Mitchell

From: sikaHOSIHMP
Sent: Wednesday, 17 December 2025 4:27 pm
To: sikaHOSIHMP
Subject: Please Reconsider Deer Protection Proposal

From: A Stroud [REDACTED] s9(2)(a)
Sent: Wednesday, 10 December 2025 4:53 pm
To: Tama Potaka (MIN) [REDACTED] s9(2)(a)
Cc: James Meager (MIN) [REDACTED] s9(2)(a)
Subject: CORTP-6414 Please Reconsider Deer Protection Proposal

Kia ora Minister Potaka,

I am writing to express my disbelief at the proposal to make deer a *protected pest* on conservation land. This decision risks becoming one of the most damaging conservation mistakes in modern New Zealand history—remembered much like the introduction of stoats and possums. It will not be a positive legacy.

Our predecessors understood the scale of the threat deer posed. They witnessed the destruction in Fiordland and worked tirelessly—often at great personal risk—to remove tens of thousands of animals in the 1960s. They knew what was at stake.

If there is any doubt about the impact deer have, I urge you to visit Chalky Island. It is one of the few Fiordland forests untouched by deer, and it is abundant with native plants now largely missing from the mainland. The difference is stark, and it makes the damage across much of Fiordland impossible to deny.

There will always be deer to hunt in Aotearoa. Populations are booming in many areas, largely because hunting focuses on stags. There is no justification for granting deer legal protection on public conservation land. Doing so will increase numbers further, undermine necessary culling, and worsen the long-term decline of our forests. As any hunter knows, degraded forests eventually produce poor-quality, unhealthy animals.

A better solution exists: support hunters to remove hinds as well as stags, invest in huts and access infrastructure, and equip people with the resources needed to control deer and pigs effectively. Creating protected commercial hunting blocks is not good conservation—it is political expediency.

It is not too late to make the right decision.

We ignored conservation experts when stoats were introduced, and the consequences have been catastrophic. We are warning you again: **do not provide legal protection for deer on conservation land.** The ecological collapse visible across Fiordland—dead canopies, browsed-out understories, drying forests—will only accelerate.

Please reconsider this proposal for the sake of our forests, our biodiversity, and the legacy we leave future generations.

Ngā mihi,

Andrew Stroud

s9(2)(a)

Benjamin Swale

Submission Details

Eirwen Harris Mitchell

From: Benjamin Swale s9(2)(a)
Sent: Monday, 8 December 2025 11:13 pm
To: sikaHOSIHMP
Subject: Attn: Sika HOSI draft HMP submissions
Attachments: Greenwashing instructions.pdf

Categories: Green Category

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Feedback on Draft herd management plan for proposed sika deer Herd of Special Interest

This is an extraordinary example of greenwashing. I wonder how many Department of Conservation staff felt proud of having to play a part in this attack on our conservation estate. Many thanks to the Hon. Tama Potaka in particular, as well as his ministerial colleagues of course for their wider roles in helping make this happen.

Well done - the consultation document looks so professional, measured and scientific - transparent even. Yet, lost in all these words is the crux of the matter - that the Government plans to use the Kaimanawa and Kaweka Forest Parks as forage for deer so that a small group of people can perhaps make money from wealthy people enjoying killing deer.

When I walk in the Kaweka Forest Park, it is obvious that most of the plants at ground level are unpalatable species that the deer do not want to eat. The canopy is quite open in many places and will become increasingly so if the seedlings and saplings, which in time should replace the current canopy, are all eaten by deer. You can see the nibbled-off leaves and twigs that have sprouted from mature kamahi trees at low levels, for example. This browsing is killing the future forest. As the climate warms, these parks will be more likely to have wildfires burning out of control (like at Tongariro National Park). The deer browsing will accelerate this process by drying the forest out. A healthy canopy would shade the understorey and ground, retaining moisture. Moreover, a lush understorey is much less liable to burn. But the current high deer numbers have allowed this understorey to be browsed out, and so it is just a matter of time until this area goes up in flames.

It is not too late to act - but the Plan should be scrapped - and the deer numbers drastically reduced as soon as possible to ensure the future of this area. This Plan must not go ahead, and the Government should fund DOC properly.

The Government recently announced funding to develop drones, which could be vital for the defence of New Zealand, or at least essential for killing some people somewhere at some point in the future. Targeting these deer pests in the Kaimanawa and Kaweka Forest Parks would provide a wonderful alternative whereby this nascent industry could be trained to track down deer in hard-to-access locations and execute them. A lot could be learned, with the IP being very much exportable.

Alternatively, how about 1080 coupled with the hunters just going on a nice tramp instead, and coming home to kill something in a field that does not feed on our valuable biodiversity?

Thanks for the consultation document. I suspect most people are so exhausted by this process that they will not provide feedback, unless they expect to gain materially from the process.

GREENWASH INSTRUCTIONS



PRETEND TO BE
SUSTAINABLE

MANIPULATE

DISTRACT FROM
EXPLOITATION OF
PEOPLE & PLANET

LOW PRICES
PAID FOR
BY THE
PLANET

A TROMPCHU
BY CLOTHINGS
IS WASTED EVERY
SECOND

WE THROW
AWAY
250 TONS
OF CLOTHES
PER DAY

LOW
PRICES
HIGH
SEA
LEVELS

REPARER
MEER
KOOP
MINDER

COOL PRICES !
→ HOT CLIMATE

Gwyn Thurlow - New Zealand Deerstalkers Association

Submission Details

Eirwen Harris Mitchell

From: Gwyn Thurlow (CEO) s9(2)(a)
Sent: Monday, 8 December 2025 5:45 pm
To: wapitiHOSIHMP; sikaHOSIHMP
Cc: Callum Sheridan (National President); John Taylor (National Secretary)
Subject: NZDA - Submission on HOSI draft plans for sika and wapiti
Attachments: NZDA Submission on GAC HOSI Herd Management Plans_8.12.2025.pdf
Categories: Green Category

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

Dear DOC,

Please find **attached**, covering both the sika and wapiti draft herd management plans, NZDA's submission.

Kind regards
Gwyn

Gwyn Thurlow
Chief Executive Officer and General Counsel



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New Zealand Deerstalkers Association Inc
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NZDA

New Zealand Deerstalkers Association

NZDA Written Submission

on

Draft Herd Management Plans

regarding

Herds of Special Interest for Sika and Wapiti

8 December 2025

To: Department of Conservation, HOSI team

Attention:

Sika HOSI Draft HMP Submissions

Wapiti HOSI Draft HMP Submissions

C/- Department of Conservation

PO Box 4715

Christchurch 8140

By email: wapitihosihmp@doc.govt.nz / sikahosihmp@doc.govt.nz

cc: Game Animal Council

Date: 8 December 2025

Prepared by: Gwyn Thurlow, Chief Executive and General Counsel

Contact information:

E: s9(2)(a)

P: s9(2)(a)

3 Collina Terrace, Thorndon, 6011, Wellington

INTRODUCTION

The New Zealand Deerstalkers Association (NZDA), representing 13,000 members, 30,000 supporters, and approximately 85,000 recreational big-game hunters, submits on the sika and wapiti herd management plans.

NZDA submits jointly on both draft plans:

1. Wapiti herd management plan: and
2. Sika herd management plan.

We note that there is overarching feedback for improvement of both draft plans.

BACKGROUND TO NZDA

Our members and all recreational hunters are the intended beneficiaries of the outcomes and each herd plan, as both herds are recreational herds. Therefore, we give input into what

will ensure the success and support of each herd and plan, from the perspective of recreational hunters. Hunters are pivotal to the outcomes and longevity of each plan.

Since 1937, NZDA has safeguarded the traditions of ethical hunting, championed unfettered public access to New Zealand's backcountry, and bolstered conservation through game management, and volunteer work – all at no cost to the public purse. These outcomes have been delivered by our volunteers across our 49 clubs nationwide, spanning from Northland to Southland, and east coast to west coast on both islands.

Our fundamental purpose is twofold: to ensure the traditions and rights of recreational hunters are protected, advanced, and advocated for in the best interests of sportsmen and sportswomen, and to serve as the national body representing and advocating on behalf of recreational hunters.

Our objectives include preserving and advancing recreational hunting, bushcraft, and shooting; fostering native flora and fauna conservation; supporting public access to public land; and supporting sound conservation practice (NZDA Core Policy).

NZDA wants to see the management of these two special herds succeed, and the management plans must set them up to achieve success.

OVERALL POSITION ON SIKA AND WAPITI HERDS OF SPECIAL INTEREST

NZDA supports the establishment of a sika herd of special interest and wapiti herd of special interest.

We endorse the submissions of the Sika Foundation and Wapiti Foundation, respectively.

Specifically, we express strong support for the core purpose and intent of herds of special interest, however, we submit both draft herd management plans need improvement in two key areas, detailed below:

1. Maintain, tracking, and reporting on, "Specialness" of a herd to hunters; and
2. Funding mechanisms and pathways.

Submission 1: New Objective Needs to Track and Maintain "Specialness" Herds

Our overriding observation is each plan, as drafted, is ecosystem-first, with herd management appended, rather than herd-first plans operating within ecological limits.

As drafted, the Minister's stated reasons for designation sit in each Foreword, while the Objectives and Strategies operate largely independently of them. By reference to the Game Animal Council Act, this is a structural flaw: if the herd is "special" for defined reasons, the Plan must *give effect to those reasons*.

Our submission is that both plans need an additional object:

"Protecting and Enhancing the Special Status of Herds of Special Interest"

NZDA and the recreational hunting community largely support the intent of Herds of Special Interest, as provided for under the Game Animal Council Act. We supported the creation of this framework because it was intended to do something fundamentally different from traditional wild animal control: to actively manage selected herds for hunting purposes, while managing ecological impacts within acceptable limits. For that framework to retain credibility and public support, herd management plans must do more than control numbers or monitor vegetation. They must test, protect, and enhance the attributes that make a herd "special", as identified by the Minister at the point of designation.

At present, the draft plans place significant emphasis on ecosystem monitoring and population suppression, but do not clearly articulate how the herds' special qualities will be identified, measured, protected, or enhanced over time from a hunting perspective.

What Makes a Herd "Special" From a Recreational Hunting Perspective is Missing

From a hunter's perspective, a Herd of Special Interest is not defined solely by density or vegetation response. Its special status is reflected in a combination of factors, including:

- **Herd health and condition**
- **Balanced age structure**, including the retention of mature animals
- **Trophy quality and opportunity to secure a trophy, real or perceived**
- **Consistency and quality of the hunting experience**
- **Sustainable harvest / hunting opportunities**
- **Wilderness character and fair access**
- **A sense of stewardship and responsibility among hunters**

These attributes are explicitly referenced in the Minister's reasons for designation and must therefore be actively provided for in the objectives and strategies of each plan.

A new objective needs to be included to reflect the above.

2. How can GAC and DOC Test Whether a Herd Remains "Special"

To ensure that a Herd of Special Interest remains worthy of that designation, the plan should include **herd-specific performance indicators**, not just environmental or biological ones.

From a recreational hunting perspective, this means monitoring and reporting on indicators such as:

- Hunter success rates and experience quality.
- Participation levels and demand relative to opportunity.
- Hunter sentiment that the herd is "special" and tracking this over time.

These indicators provide practical, real-world feedback on whether management settings are maintaining or eroding what makes the herd special. Without them, it is not possible to demonstrate that designation as a Herd of Special Interest is achieving its purpose.

3. How to Manage to Protect and Enhance Specialness

Once "specialness" is defined and measured, management must be clearly aligned to maintaining or enhancing it. From a recreational hunter perspective, this requires:

- **Selective harvest regimes** that favour retention of mature age classes
- **Sex-ratio and age-structure management** that supports quality hunting outcomes
- **Targeted control outside key hunting periods**, rather than blunt suppression
- **Protection of wilderness hunting experiences**, including access management
- **Clear limits on management actions that would materially degrade hunting quality**
- **Active involvement of hunters and the Game Animal Council in setting and reviewing herd outcomes**
- **Reporting to the hunters and their organisations**

Importantly, population control and monitoring should be treated as **tools**, not objectives in themselves. They must be justified by their contribution to maintaining herd quality, hunting outcomes, and ecological limits - rather than becoming ends in their own right.

4. Adaptive Management and Review

Given that herd management plans bind the Council and must be reviewed within five-year intervals, there should be a clear adaptive loop whereby:

- Herd and hunting indicators are tracked and reviewed annually.
- Outcomes are publicly reported.
- Management settings are adjusted where specialness is being eroded.

If monitoring of "hunter satisfaction" shows declining herd quality, loss of mature animals, reduced hunting value, or erosion of the experience that justified the designation, then management settings should be reconsidered before the next statutory review cycle.

Why Maintaining the "Specialness" in the Minds of Hunters Matters

If Herd Management Plans focus predominantly on ecosystem condition without equal regard to herd quality and hunting outcomes, there is a real risk that HOSI designation becomes little more than a refined control framework. That would undermine the intent of the Minister, the Minister's reasons for designation, and the social licence that hunters bring to conservation outcomes.

Herds of Special Interest will only retain legitimacy if hunters can clearly see, and independently verify, that management is actively maintaining what makes those herds special.

What Strategy Should be Adopted?

Ensure there's an obligation to track and protect the hunting experience.

Include qualitative and quantitative indicators of hunting experience, such as:

- Hunter success rates.
- Demand vs opportunity (e.g. ballot pressure).
- Hunter satisfaction surveys (periodic, simple).
- Hunter sentiment tracker, to test the herd is "special".

These indicators should be reported publicly alongside ecological data and herd data.

Gathering and tracking hunter data is essential and missing.

Population management and vegetation monitoring should be explicitly designed to protect and enhance the characteristics that make a herd special. Where monitoring demonstrates erosion of herd quality or hunting value, management settings must be reviewed with the same urgency as ecological decline.

Submission 2: Funding and Delivery of Herds of Special Interest

The recreational hunting community strongly supports the principle that Herds of Special Interest (HOSI) should be **largely but not wholly funded by hunters**, rather than by general taxation.

This principle is explicitly recognised in the Minister's Forewords, which reference non-government funding, hunter contribution, and self-funded management models as key expected benefits of designation.

However, for this approach to be credible and durable, **funding must flow directly to the entities that deliver herd management on the ground**, rather than being absorbed into general government systems, i.e. DOC or GAC.

Why Funding Must Be Directly Allocated to Foundations

Hunter-led Foundations and equivalent organisations:

- Are purpose-built for herd stewardship.
- Have direct accountability to the hunting community.
- Possess specialist operational knowledge of the herd and its challenges.
- Deliver management outcomes efficiently and at lower cost.

- Reinforce volunteerism, stewardship, and social licence.
- Attract the trust of the hunters, who trust them to manage the herds in their best interests.

Routing hunter-generated funding through central government risks diluting these benefits and undermines the very partnership model HOSI is intended to enable.

From a recreational hunter perspective, **we are willing to fund herd management where there is a clear line of sight between contribution and outcome.** That trust is far stronger when funding is held, governed, and delivered by dedicated Foundations rather than pooled into broader departmental budgets.

Herds of Special Interest were not conceived as a mechanism to expand general conservation funding. They were created to enable targeted, herd-specific management for hunting purposes, delivered collaboratively by hunters, iwi, the GAC, and with input of DOC.

Direct funding to Foundations is essential because it:

- Preserves the independence of herd management decisions.
- Prevents HOSI becoming a de facto government control programme.
- Ensures funding is used specifically for the herd for which it was raised.
- Maintains clear accountability to hunters and contributors.
- Supports continuity of expertise and institutional memory.

If funds raised under HOSI are routed through government systems, there is a real risk that the model shifts from co-management to user-pays control, which would erode hunter support and undermine the Minister's stated intent.

The Minister has identified hunter stewardship, empowerment, and non-government funding as core benefits of HOSI designation. Those outcomes are best achieved where:

- Hunters fund the management of the herd they value.
- Foundations are resourced to employ staff, contract services, and coordinate volunteers.
- Financial accountability is transparent and herd-specific.
- Management decisions remain closely connected to real-world hunting outcomes.

This approach also reduces pressure on public finances and aligns with broader government objectives around community-led conservation.

To give effect to this approach, we recommend the following principle be inserted into each Herd Management Plan:

Funding generated through hunter fees, partnerships, sponsorships, or other revenue mechanisms associated with a Herd of Special Interest should, wherever practicable, be directed to the recognised herd management foundation or equivalent hunter-led entity responsible for on-the-ground delivery, rather than being retained within general government funding pools.

This does not remove oversight or accountability. Rather, it ensures funding follows function.

We recognise the importance of transparency and public confidence. Direct funding to Foundations should therefore be accompanied by:

- Annual reporting against agreed objectives and strategies.
- Clear performance and financial accountability.
- Oversight appropriate to public land management.
- Alignment with the Minister's delegation and conditions under the Act.

This balanced approach protects both public interest and the integrity of the HOSI framework.

From a recreational hunter perspective, HOSI will only succeed if hunters can see that:

- Their funding is directly supporting the herd they value
- Management is delivered by entities with genuine expertise and connection to the herd
- Decision-making remains focused on maintaining and enhancing what makes the herd special.

Direct funding to Foundations is not a peripheral issue: it is central to maintaining trust, stewardship, and the long-term success of Herds of Special Interest.

Submission 3. Other Matters on the Draft Plans

We make the following points relevant to the objective, strategy and implementation of each HOSI and Plan.

1. Guarding Against HOSI Becoming Default Policy for All Deer

Herds of Special Interest should remain **exceptional, not routine**. HOSI designation must not become a substitute for broader deer management policy, nor should its principles be assumed to apply universally across public conservation land. If HOSI is expanded without strong protection of "specialness", it risks losing legitimacy and purpose.

2. Clear Separation Between HOSI Management and General Wild Animal Control

The plans should clearly distinguish between:

- Management actions taken because a herd is special, and
- Actions that would occur regardless under standard wild animal control regimes.

Without this distinction, HOSI risks being perceived as a rebranding of control activity rather than a genuinely different management tool.

3. Protection From Policy Drift Over Time

Given that herd management plans bind the Council and are reviewed on a five-year cycle, safeguards are required to prevent gradual erosion of hunting outcomes through incremental changes. Clear principles protecting herd quality, hunting experience, and access should endure across plan revisions and ministerial changes.

4. Certainty Around Hunting Access and Fairness

The plans should explicitly affirm that:

- Recreational access is a protected value of HOSI designation
- Allocation systems (e.g. ballots) must be transparent and fair
- Management decisions must avoid concentrating opportunity among a narrow group

Perceived inequity in access will undermine hunter support and stewardship.

5. Avoidance of Over-Reliance on Aerial and Thermal Control

While professional control has a role, over-reliance on aerial or thermal methods risks undermining both hunting outcomes and social licence. HOSI should prioritise ground-based, hunter-inclusive methods wherever practical, particularly in areas central to the hunting experience.

6. Protecting Hunter Social Licence

Hunters bring value not only through harvest but through volunteer effort, monitoring, infrastructure maintenance, and conservation support. Management approaches that marginalise hunters or treat them primarily as a funding source risk eroding this social licence. HOSI should visibly value hunters as partners.

7. Transparency Around Success and Failure

Plans should be honest about uncertainty. If management settings are not delivering improved herd quality, hunter satisfaction, or conservation outcomes, that should be openly acknowledged and addressed. HOSI credibility depends on transparent reporting, not only success narratives.

8. HOSI's should allow for flexibility in the first 5 years.

A Herd of Special Interest framework that is not explicitly adaptive risks becoming brittle, politicised, and ultimately unsuccessful, despite strong good-faith investment by hunters and communities.

Herds of Special Interest represent a new and evolving approach to game animal management under the Game Animal Council Act. As such, these plans should explicitly acknowledge that they are experimental and adaptive in nature, rather than rigid frameworks designed to deliver fixed or predetermined outcomes.

From a recreational hunter perspective, there is a real risk that overly prescriptive objectives, narrow success metrics, particularly those focused predominantly on ecological outcomes, could set Herds of Special Interest up to fail before they have had sufficient time or flexibility to mature.

HOSI designation was intended to enable learning, collaboration, and improvement over time. That requires:

- Management settings that can be adjusted as understanding of herd dynamics improves
- A willingness to trial, evaluate, and refine approaches rather than entrenching a single management philosophy
- Recognition that both ecological and hunting outcomes fluctuate naturally over longer timeframes
- Success being measured through trends and resilience, not short-term perfection

If HOSI is judged against static benchmarks or narrow indicators, it risks being assessed unfairly when natural variability, climatic events, market changes, or access constraints influence outcomes.

Accordingly, Herd Management Plans should be designed to support adaptive management, with clear feedback loops, staged implementation, and realistic expectations. Early-stage HOSI should not be constrained by overly rigid thresholds or framed in a way that allows any short-term deviation to be interpreted as failure.

Instead, plans should focus on:

- Direction of travel
- Continuous improvement
- Adjustment where outcomes are not being achieved

This approach aligns with the Minister's stated intent to empower hunter stewardship, improve outcomes collaboratively, and build sustainable, self-funded herd management models over time.

Patrick Turner

Submission Details

Eirwen Harris Mitchell

From: Patrick Turner s9(2)(a)
Sent: Monday, 8 December 2025 8:34 pm
To: sikaHOSIHMP
Subject: Sika Herds of Special Interest

Categories: Green Category

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

Submitter Details:

Patrick Turner

s9(2)(a)

s9(2)(a)

s9(2)(a)

I am a recreational hunter with extensive experience in the Kaimanawa–Kaweka region, a long-standing member of the New Zealand Deerstalkers Association (NZDA), vice-president of the North Canterbury NZDA branch, and an active supporter of the Sika Foundation. I regularly hunt the Central North Island (CNI) forests, and have seen firsthand the value of hunter-led management for Sika, biodiversity, and local communities.

Overall Position

I **strongly support** the designation of the Central North Island Sika herd as a **Herd of Special Interest (HOSI)** under the Game Animal Council Act 2013 and fully endorse the Draft Management Plan developed in partnership with the Sika Foundation, NZDA, iwi, and other stakeholders.

The Sika herd is one of New Zealand's most culturally, economically, and recreationally significant game animals. For more than half a century, hunters—not government agencies—have been the primary contributors to knowledge, management, and conservation of the herd and its habitats. The Sika Foundation and NZDA have proven that **hunter-led stewardship delivers outstanding results**, including large-scale predator control, habitat protection, and high-quality herd monitoring.

This Plan is the essential next step in formalising a management system that is already working extremely well.

Key Reasons for Support

1. The Sika Herd Is a National Taonga for Hunters and Communities

The Central North Island Sika herd is New Zealand's most popular game animal, attracting tens of thousands of hunters annually. The unique challenge of hunting Sika, combined with the rich traditions built over generations, has created a strong, cohesive community of responsible hunters who deeply value the herd and the landscape.

Designating the herd as HOSI recognises its national importance and secures it for future generations—precisely what NZDA and the Sika Foundation have advocated for over a decade.

The Sika Foundation’s extensive monitoring programme (trail cameras, faecal sampling, mapping) is the most advanced deer monitoring system in the country. This is science driven **by hunters**, for hunters and conservation.

2. Hunter-Led Management Already Works — HOSI Status Strengthens It

In contrast to regions with little organised hunter engagement, the CNI is a model of collaboration:

- The Sika Foundation runs the largest volunteer deer monitoring network in NZ.
- Hunters fund and operate significant predator trapping networks that protect whio, kiwi, and native species.
- NZDA branches support education, reporting, and research on herd health and distribution.
- Hunters conduct market recovery and selective harvest that maintain a stable, healthy herd.

The Draft Plan gives hunters the formal mandate and recognition they deserve, enabling:

- coordinated herd management
- standardised annual monitoring
- rapid adaptive responses to herd trends
- ongoing collaboration with iwi and DOC
- sustainable, high-quality hunting opportunities

This is exactly what the Game Animal Council Act envisioned: structured, cooperative management of important game resources.

3. Proven Conservation Gains Delivered by Hunters

The narrative that deer and biodiversity cannot coexist is outdated and not supported by the evidence in the CNI. The Sika Foundation’s conservation work—much of it self-funded by hunters—includes:

- **Extensive predator trapping networks**, including in the Kaimanawa and Kaweka Ranges
- **Whio protection and monitoring** programmes
- Support for **kiwi protection** initiatives
- **Habitat research and restoration** projects
- Large-scale **volunteer labour** assisting DOC with biodiversity work

Hunters have consistently demonstrated their commitment to conservation because they understand that **healthy ecosystems produce healthy herds**.

The Draft Plan formalises the monitoring and adaptive management needed to ensure:

- browsed species recover where necessary
- habitat indicators remain stable or improve
- deer distribution is managed to prevent localised impacts
- population levels align with ecological and recreational goals

This is balanced, pragmatic, and science driven—the exact philosophy NZDA has championed nationwide.

4. Economic, Social, and Cultural Benefits Are Significant

Sika hunting injects millions of dollars annually into the Central North Island through:

- accommodation
- local tourism and retail
- fuel and transport
- guiding services
- hunting events such as the Sika Show

The Sika Foundation alone brings thousands of hunters to the region each year for events, conservation programmes, and monitoring activities.

The Draft Plan secures these benefits by:

- ensuring long-term herd viability
- maintaining access and opportunity
- empowering the local hunter community

Furthermore, the Plan strengthens relationships with iwi partners, embedding mātauranga Māori and shared values around sustainable management.

5. A Practical, Adaptive, Science-Based Approach

The CNI Sika herd is large, dynamic, and geographically complex. The Draft Plan correctly avoids simplistic density targets and instead focuses on:

- measurable habitat outcomes
- robust monitoring
- selective harvest
- collaboration with market recovery
- five-year reviews to incorporate new science

- targeted control in sensitive ecological zones

This is the kind of flexible, evidence-based management that has been missing from many wildlife programmes in New Zealand.

The Plan is realistic and achievable because the hunter community is already doing the bulk of the work—HOSI status simply gives it structure and longevity.

Recommendations

- **Adopt the Draft Plan in full**, including the Sika Foundation’s lead operational role.
- Strengthen coordination between DOC, the Game Animal Council, NZDA, and the Sika Foundation to ensure efficient implementation.
- Maintain consistent communication with hunters so practical field knowledge continues to guide decision making.
- Report outcomes annually to demonstrate the value of hunter-led management to the wider public.

Conclusion

The Sika herd is one of New Zealand’s greatest recreational assets and a cornerstone of our hunting culture. Hunter-led management—driven by NZDA and the Sika Foundation—has already demonstrated exceptional success in conservation, data collection, and herd protection.

Designating the Central North Island Sika as a **Herd of Special Interest** is a natural progression that strengthens an already high-performing management system. It recognises the enormous contribution hunters make to conservation and ensures that both biodiversity and recreational hunting thrive together.

I strongly urge DOC and the Minister for Hunting and Fishing to adopt the Plan without delay.

Thank you for the opportunity to submit. I am available to discuss these matters further.

Sincerely,

Patrick Turner

Simon Upton - Parliamentary Commissioner for the Environment

Submission Details



Feedback on the Draft Herd Management Plan for proposed Kaweka and Kaimanawa Sika Herd of Special Interest

8 December 2025

To Department of Conservation

Submitter details

This submission is from the Parliamentary Commissioner for the Environment, Simon Upton.

My contact details are:

Phone: s9(2)(a)

Email: s9(2)(a)

Parliamentary Commissioner for the Environment

The Parliamentary Commissioner for the Environment was established under the Environment Act 1986. As an independent Officer of Parliament, the Commissioner has broad powers to investigate environmental concerns and is wholly independent of the government of the day. The current Parliamentary Commissioner for the Environment is Simon Upton.

Submission

I will keep my comments on this Draft Herd Management Plan for Kaweka and Kaimanawa Sika Herd of Special Interest (HOSI) brief.

This proposal represents a compromise between ideal conservation goals and the reality of budget limitations. Faced with the high cost of eradication or ongoing control of sika, amongst other priorities, DOC proposes to give hunters a formal role in controlling the population. In exchange, hunters will have a greater say over how the population is managed.

In principle, I have nothing against such a compromise, provided the terms of the agreement are clear and fair. However, if any such compromise is going to be proposed, the public is entitled to be clear about its terms.

I would make the following observations about the consultation document:

- I would have expected a document that was much clearer about the terms of what is proposed. Large tracts of text are devoted to recounting history and the roles of various parties. The hard facts of what has happened to the sika population and indigenous biodiversity are missing, as are the actual known impacts of control efforts.
- This document is filled with vague language. It sets out an ‘approach’. One of the objectives is to “**seek** to generate in-kind support, and revenue through partnerships and

sponsorships, to **contribute to** the cost of delivering this Plan” [emphasis added]. Similarly, under research: “**seek** opportunities to undertake or support research relevant to the management of sika and/or their effects within the Sika Area.” There is a lot of ‘seeking’ going on in this plan – and yet there is also almost no clear ambition about what it seeks to achieve.

- HOSI should be a privilege, not a right, and the Plan should not limit DOC’s ability to resource other priorities. The Sika Foundation must accept the risk that DOC may reprioritise spending **at any time** to achieve the best conservation outcomes generally.
- I would have expected a much shorter, tighter document that spelt out control targets and biodiversity improvement targets, as well as details of the funding that will be committed, and by whom, to achieve these targets along with an agreed monitoring programme.
- Given that one of the purposes of HOSI management plans is to manage a conservation challenge differently, I would have expected that the success or otherwise of this experiment would be monitored and evaluated. Any final plan should include explicit monitoring and evaluation provisions and articulate how they will be funded.
- As currently framed, this is not a ‘draft herd management plan’ but a draft set of good intentions to generate one.

I worry that, if adopted in its current form, this ‘plan’ – filled with many good intentions – will end up being under-resourced, only partially implemented, insufficiently monitored and subject to a host of trade-offs that are never fully disclosed to the public. In short, there are too many words and not enough specificity.

Finally, I note that seeking a determination from the New Zealand Conservation Authority within the existing system offers a simpler way forward than creating a HOSI. The advantage of going through the Authority is that it preserves the prioritisation of conservation.



Rt Hon Simon Upton
Parliamentary Commissioner for the Environment
Te Kaitiaki Taiao a Te Whare Pāremata

Liz Weir - Mackenzie Guardians

Submission Details

Eirwen Harris Mitchell

From: Liz s9(2)(a)
Sent: Sunday, 7 December 2025 9:31 pm
To: sikaHOSIHMP
Subject: Submission
Attachments: Sika HOSI submission - Mackenzie Guardians.pdf

Categories: Green Category

You don't often get email from s9(2)(a) [Learn why this is important](#)
Please find attached a submission on the sika Plan.

Kind regards
Secretary for Mackenzie Guardians Inc

Liz Weir

s9(2)(a)

s9(2)(a)

Mackenzie Guardians Incorporated



Aoraki/Mt Cook National Park

Date: 6 December 2025

Full name of Submitter: Mackenzie Guardians Incorporated

To: The Department of Conservation

Email: sikahosihmp@doc.govt.nz

Feedback on the Sika Herd of Special Interest in the Kaimanawa and Kaweka Forest Parks Proposed Management Plan

Background.

The Mackenzie Guardians (the Society) is a community group formed in 2009 to promote the protection of the natural/naturalistic wildlife, water, vegetation, heritage, and landscape values of Te Manahuna/the Mackenzie Country. The area's rich history, heritage, ecology and outstanding natural features and landscapes are treasured by our members.



Mt Cook Lily

The Society does not limit its concern to policies and plans which impact the Aoraki/Mt Cook National Park.

We are concerned for all National Parks, and areas with high conservation values in Aotearoa/NZ. Our key concern with the Sika Management Plan (the Plan) is the precedent that will be set if the HOSI proceeds and is followed by other proposals in National Parks and Public Conservation areas. The Society appreciates the opportunity to provide feedback on the Plan.

Objectives and Strategies in the Plan.

The purpose, objectives and strategies appear to favour hunters by providing healthy animals to hunt and improve the hunting experience. There are no clear achievable outcomes for the protection of indigenous flora and fauna values in the Kaimanawa and Kaweka Forests and Conservation Area. These public conservation lands are the most treasured of our landscapes, not to be put at risk by any recreational or commercial pursuits. Much more robust and achievable ecological targets need to be set in the Plan before a sika herd is granted 'special' status.

A gap in the Plan is the lack of scientific data to show how healthy herds of pest animals will improve conservation values. The Society believes these are competing objectives. Adaptive Management is too vague a strategy and may be too late to prevent forest collapse.

History shows management plans are not always successful e.g., the Himalayan Tahr Control Management Plan which the Society understands has failed to reduce tahr numbers to 10,000 and failed to stop the spread of tahr beyond the limits set in the Plan. If this is an example of hunter-led management working alongside DOC, then the Society has no faith in the current proposed sika HOSI Plan.



Complete removal of tall tussock grasslands by tahr in South Westland

DoC Image



Tabr damage to the Mount Cook lily – before (left) and after (right).

DoC Image

The Plan lacks any information on how the sika HOSI is to be funded. The Society requests that no HOSI proposal is funded from the DOC budget. There is insufficient data in the Plan about monitoring alpine and forest vegetation. A robust monitoring programme should be set with achievable ecological targets. This will come at a high cost which should not be funded by DOC. This funding responsibility lies with the hunters.

Conclusion

The Society requests the term ‘Herds Of Special Interest’ be deleted from planning and policy discussions about controlling pest animals in NZ. It is clear from recent media reports that introduced feral animals (deer, thar, chamois, goats and pigs) are exploding in our native forests, in alpine environments, on farm and forestry land, everywhere in NZ. The timing is completely wrong to be elevating some pest animals to a ‘special’ status, to live and browse in the best of our Forest Parks. What is needed urgently is a DOC led multi-species pest control plan in our National Parks, Forest Parks and areas with high conservation values, assisted by all interested parties.

Without a robust Management Plan to fully protect the indigenous flora and fauna values of the Kaimanawa and Kaweka Forests, the Society requests the Minister for Hunting **reject** the current sika proposal for designation as a HOSI.

The Society wishes to be heard in support of this submission.

Mackenzie Guardians Incorporated.

Danette Wereta - Animal Justice Party

Submission Details

Eirwen Harris Mitchell

From: danette wereta s9(2)(a)
Sent: Monday, 8 December 2025 8:50 am
To: Animal Justice Party General Secretary
Cc: sikaHOSIHMP
Subject: Re: Attn: Sika HOSI draft HMP submissions
Attachments: Proposal to designate the Kaimanawa-Kaweka sika population as a Herd of Special Interest .pdf

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Green Category

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Kia Ora,

Due to issues with the AJP inbox, ensuring this email has been received.

Thanks,
Danette

On Mon, Dec 8, 2025 at 8:48 AM Animal Justice Party General Secretary s9(2)(a) wrote:

Kia Ora,

Please find attached our submission - which we are also happy to discuss,

Submission on the Draft herd management plan for proposed sika deer Herd of Special Interest

Introduction

1. The following submission has been prepared by the Animal Justice Party Aotearoa New Zealand (AJP).
2. The AJP is a registered political party dedicated to advocating for the rights, welfare and protection of animals. Our mission is to create a society where animals are treated with respect, compassion and consideration. Through active participation in the political landscape, we aim to drive policy changes that reflect our commitment to a more ethical and sustainable future.
3. AJP opposes the proposal to designate the Kaimanawa-Kaweka sika deer population as a Herd of Special Interest (HOSI). The current approach to introduced species, relentless killing, aerial shooting, poisoning, and hunting is already failing animals and failing the environment. This proposal does not fix that failure. It simply reshapes it around the desires of hunters. Designating a HOSI entrenches the same harmful, outdated system under a new label.

4. Conservation should protect ecosystems without expanding killing, it should address the real drivers of biodiversity decline, and should invest in modern, humane, non-lethal tools. Instead, this proposal prioritises a small hunting lobby over ecological science, animal welfare, and the interests of the wider public.
5. New Zealand deserves conservation solutions that work for animals and the environment, not another mechanism that keeps us locked into a kill-first model.

Key Concerns

6. Reinforcing a kill-first, hunter-centric model of conservation

7. The HOSI framework formalises a system in which lethal management is the default and where the interests of hunters are placed at the centre of decision-making.

Rather than encouraging non-lethal innovation, it reinforces outdated thinking: more killing, or different ways of killing, as the primary management tool.

8. You only need to spend a few minutes on local hunting pages across Facebook to see the reality behind the narrative. The posts show animals suffering, hunters celebrating cruelty, illegal activity, and the deeply concerning attitudes that many in these groups hold. These same groups routinely target and harass AJP members and supporters. A picture is painted publicly that these are “great people doing great things outdoors,” but the lived reality is very different.

9. Conservation must not be outsourced to hunting lobbies

10. The proposal is driven by hunters whose core objective is to secure ongoing access to animals for recreational killing.

Conservation decisions must be guided by ecological expertise, Treaty partnership, independent science, and animal welfare principles, not by the desires of a small interest group.

11. Aerial killing is cruel, and replacing one cruelty with another is not progress

12. Aerial culling causes extreme, well-documented suffering: animals can be chased to exhaustion, wounded rather than killed, and die slowly out of sight. But shifting this cruelty to recreational hunters does not create a humane system, it simply swaps one form of suffering for another.

13. The Plan presents killing as inevitable and simply debates the method. AJP rejects the notion that cruelty can be solved with “different cruelty.” New Zealand should be reducing harm, not institutionalising more.

14. Lack of exploration of humane, modern alternatives

15. The Plan does not consider non-lethal, innovative tools that are increasingly standard in modern wildlife management.

16. AJP urges the Minister and DOC to require these alternatives to be developed and assessed before proceeding with any decision on a HOSI.

17. We cannot return to “pre-human NZ”, we must move toward coexistence

18. The idea that we can kill our way back to a pre-human Aotearoa is ecologically unrealistic and ethically harmful. Introduced species have been here for generations and are now part of human-altered systems.

19. The future of conservation lies in compassionate coexistence, intelligent ecological design, and reducing the human drivers of biodiversity decline, not creating new special categories to protect animals for recreational killing. We should be driving research, piloting new technologies, and modelling global best practice, not expanding systems built on killing.

20. A HOSI designation ties us to outdated, violent, and ecologically limited methods.

Conclusion

21. AJP calls for this proposal to be withdrawn. The HOSI framework is fundamentally incompatible with ethical, science-based conservation, and this draft plan fails to meet the standards required to proceed. The Minister may be advancing this proposal, but that does not remove DOC's responsibility to ensure that conservation policy is evidence-based, humane, and aligned with the wider public interest. AJP urges DOC, statutory partners, and any future decision-makers to reject the Sika HOSI model and to shift conservation toward modern, non-lethal, compassionate practice. New Zealand deserves solutions that protect ecosystems without expanding killing.

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- [Calling Animals "Pests" Is More About Us Than Them;](#)
- [Wildlife Conservation: Bringing Compassion to Wild Animals;](#)
- [Compassionate Conservation Matures and Comes of Age.](#)
- [Summoning compassion to address the challenges of conservation](#)
- [Emotion as a source of moral understanding in conservation | US Forest Service Research and Development](#)

Ngā mihi me te aroha nui,

Danette Wereta, General Secretary

Animal Justice Party Aotearoa NZ

w. animaljustice.org.nz

e. s9(2)(a)



Submitters Details

Full name: *Animal Justice Party Aotearoa New Zealand*

Address: s9(2)(a)

Contact: *Karen Singleton*

Email: s9(2)(a)

Date: *08 December 2025*

Author: *Danette Wereta*

Reviewer: s9(2)(a)



Submission on the Draft herd management plan for proposed sika deer Herd of Special Interest

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7. The HOSI framework formalises a system in which lethal management is the default and where the interests of hunters are placed at the centre of decision-making. Rather than encouraging non-lethal innovation, it reinforces outdated thinking: more killing, or different ways of killing, as the primary management tool.

8. You only need to spend a few minutes on local hunting pages across Facebook to see the reality behind the narrative. The posts show animals suffering, hunters celebrating cruelty, illegal activity, and the deeply concerning attitudes that many in these groups hold. These same groups routinely target and harass AJP members and supporters. A picture is painted publicly that these are “great people doing great things outdoors,” but the lived reality is very different.

9. Conservation must not be outsourced to hunting lobbies

10. The proposal is driven by hunters whose core objective is to secure ongoing access to animals for recreational killing. Conservation decisions must be guided by ecological expertise, Treaty partnership, independent science, and animal welfare principles, not by the desires of a small interest group.

11. Aerial killing is cruel, and replacing one cruelty with another is not progress

12. Aerial culling causes extreme, well-documented suffering: animals can be chased to exhaustion, wounded rather than killed, and die slowly out of sight. But shifting this cruelty to recreational hunters does not create a humane system, it simply swaps one form of suffering for another.
13. The Plan presents killing as inevitable and simply debates the method. AJP rejects the notion that cruelty can be solved with “different cruelty.” New Zealand should be reducing harm, not institutionalising more.

14. Lack of exploration of humane, modern alternatives

15. The Plan does not consider non-lethal, innovative tools that are increasingly standard in modern wildlife management.

16. AJP urges the Minister and DOC to require these alternatives to be developed and assessed before proceeding with any decision on a HOSI.

17. We cannot return to “pre-human NZ”, we must move toward coexistence

18. The idea that we can kill our way back to a pre-human Aotearoa is ecologically unrealistic and ethically harmful. Introduced species have been here for generations and are now part of human-altered systems.

19. The future of conservation lies in compassionate coexistence, intelligent ecological design, and reducing the human drivers of biodiversity decline, not creating new special categories to protect animals for recreational killing. We should be driving research, piloting new technologies, and modelling global best practice, not expanding systems built on killing.

20. A HOSI designation ties us to outdated, violent, and ecologically limited methods.

Conclusion

21. AJP calls for this proposal to be withdrawn. The HOSI framework is fundamentally incompatible with ethical, science-based conservation, and this draft plan fails to meet the standards required to proceed. The Minister may be advancing this proposal, but that does not remove DOC's responsibility to ensure that conservation policy is evidence-based, humane, and aligned with the wider public interest. AJP urges DOC, statutory partners, and any future decision-makers to reject the Sika HOSI model and to shift conservation toward modern, non-lethal, compassionate practice. New Zealand deserves solutions that protect ecosystems without expanding killing.

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