

Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan

Submission Attachments - submitter last names A - Cor

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Bruce Allan - Project Peel Society Inc

Submission Details

Eirwen Harris Mitchell

From: Bruce and Rosa Allan s9(2)(a)
Sent: Saturday, 6 December 2025 8:46 pm
To: wapitiHOSIHMP
Subject: submission on the draft herd management plan for Fiordland wapiti Herd of Special Interest

Categories: Green category

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To whom it may concern.

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

Regards
Bruce Allan (chairperson)



HOSI submission 5/12/25

s9(2)(a)

s9(2)(a)

Thursday December 4 2025

Submission on: Draft herd management plan for Fiordland wapiti Herd of Special Interest

By: Project Peel Inc Soc

Contact person: Dr Bruce Allan *Chairperson*

Email: s9(2)(a)

Mobile: s9(2)(a)

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

Thank you for this opportunity to have our say.

Project Peel is not opposed to any plan that helps to effectively address the current over-population of feral deer numbers in New Zealand. We support a pragmatic approach to this problem where conservationists, recreationists, private land users and hunters can all work together to achieve, in the Hon James Meager's words, "*benefits of improved ecological outcomes for indigenous species and ecosystems*".

The proposed management plan for wapiti in Fiordland falls well short of achieving the Minister's claims. We feel the plan is ill-conceived and lacking in detail, particularly in relation to implementation strategies.

A major concern for us is that the goals in this plan for "*wild animal management*" differ hugely from accepted and practical conservation goals for "*wild animal management*". The plan's primary objective (*Section 3: Objective1*) states "*Fiordland wapiti are managed in a manner that allows for the maintenance of natural biodiversity by restoring ecological processes....*". This objective is far from precise and measurable. For the plan to achieve any success, this objective must be reworded to clearly **identify** and **maintain** the **minimum feral animal density** required to achieve the desired ecological benefits.

The plan also lacks specifics in other areas, particularly around monitoring, research and reporting. When referring to specific techniques we note the frequent use of the vague phrase “may include, and not limited to...”

The plan also lacks fiscal costs. We are concerned that the cost of the plan's implementation may be underestimated. There is no indication of administration and management costs, nor any indication of the extent of revenue gained through “*hunting fees*”. Will the fees be set high enough to allow ‘surplus’ revenue to be directed to conservation initiatives, as suggested?(*Strategy 1.8*). The Government (tax payer) must not be expected to cover shortfalls. We feel there must be a far more robust guarantee of hunter support toward local conservation initiatives.

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

The proposed plan is within a designated World Heritage Area. The plan must include an assessment of potential effects on any of the World Heritage values.

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

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





UNDERSTORY DEVASTATION!



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

Ross Allen - NZDA Southern Lakes Branch

Submission Details

Eirwen Harris Mitchell

From: Ross Allen [s9(2)(a)]
Sent: Monday, 8 December 2025 3:58 pm
To: wapitiHOSIHMP; [s9(2)(a)]; Branch President
Subject: Wapiti Submission on behalf of the SLNZDA
Attachments: SLNZDA Wapiti Hosi.pdf

Categories: Green category

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Attached is the submission on behalf of the SLNZDA

Thanks,

Ross

Ross Allen

Strategist and Designer

Founder | Leverage

MBA BcApSc



[Book a Call with Me](#)

[s9(2)(a)]

[s9(2)(a)]

www.leverage.nz

60 Toru Road, Paraparaumu Wellington

36 Grant Road, Frankton, Queenstown

Submission on the Proposed Fiordland Wapiti Herd of Special Interest (HOSI) Management Plan

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

1. Introduction

The Southern Lakes branch of the New Zealand Deerstalkers (SLNZDA) welcomes the opportunity to comment on the proposed Fiordland Wapiti Herd of Special Interest (HOSI) Management Plan. Our branch represents hunters, families, and conservation-minded members from across the Southern Lakes region. Many of our members regularly hunt in Fiordland and have a long-standing connection to the wapiti herd and the landscape in which it lives.

We support the intent behind establishing a Herd of Special Interest and recognise the need for a clear, well-structured management system. However, several amendments are required to ensure the plan is workable, fair, efficient, and reflective of the values New Zealanders hold for the Fiordland wapiti herd.

2. Overall Position

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

3. Why the Wapiti Herd Matters

The Fiordland wapiti herd holds significant national value. For many of our members, wapiti represent:

- A deep heritage and legacy stretching back more than a century
- A uniquely challenging backcountry experience found nowhere else in New Zealand
- Meaningful connection to wild places and personal wellbeing
- A landscape where families and generations can experience true adventure
- A trophy animal that contributes to both cultural identity and hunter aspirations

A management plan must reflect these values and safeguard the experiences and traditions associated with Fiordland wapiti.

4. Social and Community Outcomes

The Herd Management Plan must strengthen, not weaken, hunter-led conservation. Community-led operations have been the foundation of wapiti management for decades and should remain at the heart of the HOSI.

The plan should explicitly support:

- Community ownership and participation
- Positive social, cultural, and economic benefits for the region
- A partnership approach that recognises the expertise and volunteer capacity within the hunting community

5. Funding Structure

All funding for the Wapiti HOSI must be simple, transparent, and direct.

SLNZDA strongly recommends that all funding flows directly from the source to the implementing group (the Fiordland Wapiti Foundation).

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

6. Financial Reporting Requirements

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

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

7. Operational Plan Structure

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

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

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

8. Vegetation and Ecological Monitoring

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

SLNZDA recommends the following:

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

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

9. Roles, Responsibilities, and Delegation

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

The Fiordland Wapiti Foundation has demonstrated a proven, successful track record in managing wapiti populations and conducting large-scale deer control, carcass recovery, and monitoring operations. Their two decades of experience provide a foundation of practical knowledge unmatched by any other group.

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

10. Set the Correct Tone: Management, Not Control

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

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

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

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

11. Conclusion

SLNZDA supports the establishment of a Herd of Special Interest for Fiordland wapiti, provided the Herd Management Plan is amended to:

- Protect the unique value and heritage of the wapiti herd
- Enable a fair, practical, hunter-led management system
- Maintain the positive social and community benefits wapiti provide
- Ensure funding flows directly to those doing the work
- Keep monitoring and reporting efficient and meaningful
- Delegate operational decision-making to the Fiordland Wapiti Foundation
- Use language aligned with modern deer management practices

The Fiordland wapiti herd is a national treasure. This plan is an opportunity to secure its future and enhance the relationship between hunters, conservationists, DOC, and the wider community. We ask DOC to refine the plan to ensure its success and to reflect the values and expertise of those who have cared for this herd for generations.

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

Kieran Anderson

Submission Details

Eirwen Harris Mitchell

From: Kieran Anderson s9(2)(a)
Sent: Monday, 8 December 2025 2:52 pm
To: wapitiHOSIHMP
Subject: Submission - In favour
Attachments: Fiordland HOSI herd mgmt plan Submission.docx

Categories: Green category

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Good afternoon.

Please find attached my submission in favour of the Fiordland Wapiti Herd of Special Interest Herd management Plan.

Cheers

Kieran Anderson

Good afternoon.

My name is Kieran Anderson and I am writing in support of the Herd Of Special Interest (HOSI) Herd Management plan for the Fiordland Wapiti.

I currently reside in Southland am an active hunter along side my children and have involved in hunting since I was young (Over 35 years). I have also had the privilege of hunting the Fiordland Wapiti during the Ballot 7 times over the last 15 years. As well as this I have been involved in volunteering for the Fiordland Wapiti foundation for hut building, predator trapping and vegetation monitoring.

Hunting the Fiordland Wapiti herd is extremely important to me as it has given me the chance to venture to and explore a part of New Zealand not many people get to see. I have experienced the highs and lows of the Fiordland weather and also have been part of some exceptional hunting memories created with my good friends that we will cherish for life. I have also got to experience all of the native flora and fauna in Fiordland like Blue duck, Kea, Whio, Rock wren and even Kiwi. While it was the deer that drew me there they are only an excuse to be part of this amazing landscape and I am looking forward to the day I can take my two young boys in there to experience the same as me. The legacy of the wapiti and the history behind the herd is also extremely important to me. My Grandfather hunted the Billy Burn and I have a picture that he hand painted as a reminder of his time there. And I want to be able to pass these same stories on to future generations.

I also see my time spent in Fiordland hunting the wapiti as hugely beneficial for my health and wellbeing. Hunting wapiti is a great way to test yourself against some of the harshest conditions and elements but at the same time experience some of the most beautiful and awe inspiring views and landscapes anywhere in the world.

I also value the herd in that they are unique in where they live and how they have adapted. The thrill of a wapiti bugle in the middle of Fiordland bush is something I will never get sick of. I have been lucky to have been part of 2 successful hunts in Fiordland where my mates secured old mature bulls. One day I wish to secure one of my own as well.

I support the herd Management plan as it allows hunter and community led management which places conservation first and also benefits the herd structure for a more sustainable deer herd. It also increases social and economic outcomes for the Southland community and Te Anau. Being a hunter led initiative means that the tax payer isn't directly funding the management of this herd and the conservation benefits.

I recommend that all funds generated for the Wapiti Herd of Special interest go directly to the team managing the Management plan (like FWF) and not DOC or the GAC. This means that all funds collected can go directly to the conservation efforts and programs that they are delivering and not soaked up in bureaucracy and red tape.

The herd Management plan is not about control of the Fiordland wapiti it is about active management. I propose the reference to the term "control" removed from the HOSI HMP and replaced with "management".

In conclusion I support the Fiordland Wapiti Herd of Special Interest Herd management plan with the suggested amendments above.

Regards

Kieran Anderson

Southland

Dee Austring

Submission Details

Derek Barnston

Submission Details

Eirwen Harris Mitchell

From: derek.barnston s9(2)(a)
Sent: Monday, 8 December 2025 5:47 pm
To: wapitiHOSIHMP
Cc: SikaHerdOfSpecialInterest@doc.govt.nz
Subject: Submission on the Draft Wapiti Herd of Special Interest (HOSI) Management Plan

Categories: Green category

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Derek Barnston

s9(2)(a)

s9(2)(a)

s9(2)(a)

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

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

I disagree with giving deer any type of legal protection on our Conservation Estate. This is a totally backward step, and goes completely against the history and science of conservation in New Zealand. It would appear to be politically motivated.

However, sadly it looks like this decision is already proceeding, 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.

s9(2)(a)

Craig Benbow

Submission Details

Eirwen Harris Mitchell

From: Craig Benbow s9(2)(a)
Sent: Monday, 8 December 2025 9:50 am
To: wapitiHOSIHMP
Subject: Wapiti HOSI draft HMP Submissions
Attachments: Wapiti Plan Submission.pdf

Categories: Green category

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Please find attached my submission on the draft herd management plan for the proposed Wapiti Herd of Special Interest to be established in Fiordland.

Kind regards,

Craig Benbow

Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan: Submission

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

To the Department of Conservation,

Thank you for the opportunity to submit on the Fiordland Wapiti Herd of Special Interest Draft Herd Management Plan (HMP). I strongly support the designation of the Fiordland Wapiti Herd as a Herd of Special Interest (HOSI).

My three personal hunting trips, spanning more than 10 years, during the Wapiti bugle ballot confirm that the current management regime in the Wapiti Area is working effectively and provides a highly sought-after, unique wilderness experience. The HOSI designation must formally recognize the value of this herd and its associated hunting culture, while enhancing conservation outcomes.

I wish to strongly assert that the success of the HOSI model relies on firmly placing the day-to-day implementation and delivery of the plan in the hands of the Fiordland Wapiti Foundation (FWF). The HOSI offers a cheap and highly effective alternative management system, and it is time for a new system to have a go after decades of poor outcomes under prior regimes. DOC's role should be primarily that of a land manager, supporting the FWF's established and successful user-pays approach.

Proposed Amendments to Objectives

The HMP must take a values-based approach and not a purely control management approach. Objectives must be measurable and directly related to the management of the herd.

Objective 1: Ecological Outcome (Oppose/Seek Amendment)

- **Draft wording:** *“Fiordland wapiti are managed in a manner that allows for the maintenance of natural biodiversity by restoring ecological processes and communities of browsed indigenous flora and preventing the loss of indigenous species from their current range.”*
- **Position: Oppose** this wording. This objective is too broad and non-specific. It is unachievable solely through herd management and opens the plan to non-HOSI-related interpretations. Including conservation objectives that are so broad as to be open to interpretation is unacceptable in a plan of this sort.
- **Recommended amendment:** Reword to maintain conservation focus but ensure feasibility through herd management:
"Maintain or enhance the current health of indigenous flora in the Wapiti Area, focusing on communities of browsed species, through adaptive management of the Fiordland wapiti herd."

Objective 3: Funding and FWF Autonomy (Support with Amendment)

- **Draft wording:** *“Generate sufficient revenue through partnerships and sponsorships, seek to recover costs from the hunting community, and in-kind support is increased to ensure the delivery of this Plan is wholly or largely self-funded.”*
- **Position: Support with critical amendment.** I strongly support the goal of the plan being wholly or largely self-funded. However, the HMP must secure the FWF's operational and financial autonomy to future-proof the HOSI from an unfavourable Government, as decisions regarding deer management may be made by an unsupported government entity, potentially disrupting established hunter-led management efforts.
- **Recommended amendment (Add a new sub-clause to Objective 3):**
(A) All funds generated for the Herd of Special Interest (Wapiti) from hunting community fees, partnerships, and sponsorships must be sent directly from the funding source to the implementing end user or group (the Fiordland Wapiti Foundation). Funding should not be directed to a stationary or government body (DOC/GAC) for discretionary distribution to the FWF.

Proposed Amendments to Strategies

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

- **Draft wording (Monitoring methods include):** *Faecal pellet counts.*
- **Position: Oppose** the mandatory inclusion of faecal pellet counts. Monitoring should be efficient and effective and provide information that allows the effectiveness of management actions to be evaluated. High cost data collection and analysis must be avoided as they are not efficient and in this case do not result in tangible outcomes useful to adapting management of the herd.

Strategy 4.1: Annual Operational Plan (Support with Clarification)

- **Draft wording (Strategy 4.1):** *“Develop an annual operational plan for the activities planned for the coming year to help achieve the objectives.”*
- **Position: Support**, but clarify the nature of the plan. The operational plan must be an adaptive management tool, developed by the implementer (FWF). This plan must remain separate from the Herd Management Plan and should serve as a flexible tool that inspires innovation to advance deer control techniques in New Zealand. The FWF should be held accountable for meeting the terms of the Herd Management Plan.

Strategy 4.2(d): Annual Report on Sponsorships (Oppose)

- **Draft wording (Annual Report includes):** *sponsorships and commercial partnerships.*
- **Position: Oppose** the mandatory public disclosure of detailed sponsorship and partnership information. Reporting should acknowledge that disclosing this information may be commercially sensitive and could discourage sponsor or partner involvement, especially since the FWF is a charity that may collaborate with partners on other activities outside of Fiordland.

Strategy 4.4: Annual Report Review (Oppose)

- **Draft wording:** *“Work with the Department when preparing the annual report prior to its finalisation and public release.”*
- **Position: Oppose** this requirement. This provision introduces unnecessary bureaucracy that could hinder the FWF's efficiency and autonomy. I oppose this as the plan should not be bogged down with bureaucracy or unnecessary complexity created by a third party who would be more interested in tailoring the reports to their own requirements than actually generating a report that is informative to the stakeholders actually providing the funding and opportunity to undertake the management activity.

Key Focus Areas for HOSI Success

1. **Herd Management Plans are Prototypes:** This HMP is one of two new plans trialling a new approach to managing valued introduced species and must be treated as such. They will be found wanting and will need a lot of adaptation. This HMP is not the end solution and capturing the experimental nature of these plans clearly so all parties avoid being locked into a deficient plan must be a priority to the Minister.
2. **Hunter Autonomy:** Hunters must maintain the status quo regarding the current FWF user-pays funding system. Changing the current system could weaken the trust the FWF has established with its users and supporters. The FWF must keep its autonomy so hunters remain in control of their futures.
3. **Adaptive management:** Monitoring should inform management responses aligned with an adaptive management framework. The plan should enable adaptation.
4. **Values recognition:** The HOSI model recognises the wide range of values supported by hunting (e.g., physical health, sustainable food, social connections, and conservation efforts). This enables hunter and community-led management and positive outcomes.

Helen Brosnan - New Zealand Fish and Game

Submission Details



8 December 2025

Email response to: wapitihosihmp@doc.govt.nz

Consultation closing 8 December 2025

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

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

Executive Summary

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

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

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

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

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

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

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

Our Submission

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

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

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

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

2. The HMP must adopt a values objectives strategies hierarchy

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

We support the recommended structure where:

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

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

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

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

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

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

Additional Fish & Game Perspective

Fish & Game also reinforces the following points:

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

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

4. The Fiordland Wapiti HOSI falls within a National Park

National Park legislation and policy emphasises the preservation of the 'natural state' and the extermination of introduced species. GAC requests a full Overriding Considerations Policy Analysis should be made available at the same time as the HMP to provide the necessary legal grounding and transparency.

5. Fish and Game also supports GAC obtaining the delegated authority to develop a HMP for Wapiti HOSI (much like Fish and Game write their own Sports Fish and Game Management Plans).

Conclusion

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

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

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

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

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

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

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

Contact Details

Richie Cosgrove

E: s9(2)(a)

P: s9(2)(a)



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

Attachments

Attachment 1 – About Fish and Game

About Fish and Game

- 1.1 Fish and Game is the statutory manager for sports fish and game, with functions conveyed under the Conservation Act 1987. The organisation is an affiliation of 12 regional Councils and one national Council. Together, these organisations represent approx. 130,000 anglers and hunters.
- 1.2 The sports fish and game resource managed by Fish and Game are defined and protected under the Conservation Act and the Wildlife Act 1953. The species within include introduced sports fish and a mix of native and introduced waterfowl and upland game¹.
- 1.3 Our vision, purpose and values are illustrated below:

OUR VISION Our vision is a New Zealand where freshwater habitats and species flourish, where hunting and fishing traditions thrive and all Kiwis enjoy access to sustainable wild fish and game resources.	OUR PURPOSE Fish & Game New Zealand maintains and enhances sports fish and game birds, and their habitats, ensuring access for current and future generations of New Zealanders.	OUR VALUES TRUST INCLUSION CONNECTION SERVICE
--	--	--

- 1.4 Fish and Game is entirely funded by licence holder fees and private contributions, meaning the delegated function of managing the species for the public good is funded entirely by the users. It is a democratic '*user pays, user say*'s organisation. Using this system, Fish and Game funds public good research to ensure fisheries and game populations are managed sustainably; undertakes compliance with the licencing system; and contributes to public planning processes to ensure that hunters and anglers values are recognised and provided for.
- 1.5 In relation to planning, Fish & Game have the statutory function to advocate for hunters and anglers values and ensure that the habitats of gamebirds and sports fish are provided for. At any one time we may have around 150,000 licence holders, and a larger number (approximately 300,000) that are transient licence holders. The habitat we specifically advocate for includes lakes and rivers that contain trout and salmon (and other sports fish) and wetlands where game bird hunting occurs.

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

Fish and Game in Resource Management

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



What does Fish & Game do?

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

Our vision

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

What we do

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

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

fishandgame.org.nz
#ReWild



What does Fish & Game do?

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

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



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

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



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

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



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

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



fishandgame.org.nz #ReWild

Species we manage



Black Swan Kakianau



California Quail Koitareke



Mallard Rakiraki



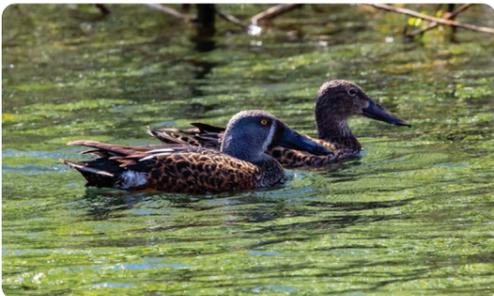
Paradise Shelduck Pūtakitaki



Pheasant Peihana



Pūkeko



Shoveler Kuruwhengi



Chukar



Grey Duck Pārera



Brown Trout



Rainbow Trout



Chinook Salmon



Sockeye Salmon



Brook Trout



Tiger Trout



Perch



Tench

Salassa Burton

Submission Details

Eirwen Harris Mitchell

From: Salassa Burton s9(2)(a)
Sent: Sunday, 7 December 2025 1:56 pm
To: wapitiHOSIHMP; SikaHerdOfSpecialInterest@doc.govt.nz
Subject: Submission on the Draft Wapoti 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](#)

Kia Ora,

My name is Salassa Burton - from s9(2)(a), s9(2)(a) New Zealand.

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.

Conservationists warned the Government not to introduce stoats, and you did it anyway. The consequences of these actions were detrimental to our native wildlife. Now we're warning you again. Do not give deer legal protection on our conservation lands. Listen to us this time.

It is absolutely embarrassing when you think of our forefathers, who saw the damage deer were causing and tried to eradicate them from Fiordland. They understood what was at stake and risked their lives removing tens of thousands in the 60's via helicopters. Do not let their efforts being in vain.

With our global ecosystems already collapsing, will you make the right decisions? Or will you allow uneducated, biased and lazy politicians to ruin our home while they watch from their multi million dollar mansions.

Ngā mihi,

Salassa.

Jesse Bythell - New Zealand Plant Conservation Network

Submission Details

Eirwen Harris Mitchell

From: NZPCN President s9(2)(a)
Sent: Monday, 8 December 2025 4:10 pm
To: DOC Info; wapitiHOSIHMP; sikaHOSIHMP
Cc: DLVC_NZ PLANT CONSERVATION NETWORK (00)
Subject: Submission from the New Zealand Plant Conservation Network on draft Herd Management Plans (Wapiti and Sika)
Attachments: NZPCN_Herd_Management_Plan_HOSI_bill_submission_FINAL.pdf
Categories: Green category

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

Hello,

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

Regards,

Jesse Bythell
(NZPCN President)



Environment Select Committee

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

Introduction

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

Summary of key points from the NZPCN submission

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

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

4. Draft Herd Management Plans lack sufficient detail

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

Monitoring data from Fiordland show no significant ecosystem recovery in the wapiti area¹. Although deer removal numbers have been somewhat increased as per the annual plans under the Community Management Agreement, the benefits seem to be negligible compared with unmanaged areas. We recognise measuring the relationship between deer density and ecosystem function and health is complex and deer move through the landscape seasonally, therefore affecting different habitats at different times. But the poor track record of ecosystem recovery and function within the Fiordland wapiti area is not encouraging. Without sufficient detail it is hard to see how the HOSI status and current draft management plans address this weakness.

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

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

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

5. Insufficient priority for indigenous biodiversity

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

We note that more than 20 indigenous plants are endemic to Fiordland and wapiti and deer affect many of these. For example, the alpine daisy *Celmisia holosericea* has recently had its conservation status upgraded from Not Threatened to 'At Risk – Declining' specifically due to the impact of ungulate browse². Rakiura has more than 20 endemic plant species which would be

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

²

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

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

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

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

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

7. Claims about the cost of HOSI implementation

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

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

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

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

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

8. Framing of the issue

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

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

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

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

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

9. Ministerial discretion

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

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

10. Transparency

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

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

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

11. References to education

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

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

****Submission ends****

Jenny Campbell - Coal Action Murihiku

Submission Details

Eirwen Harris Mitchell

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

Categories: Green category

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

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

Rangimārie, Jenny Campbell

s9(2)(a)

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

From Jenny Campbell

s9(2)(a)

s9(2)(a)

s9(2)(a)

Co- convenor Coal Action Murihiku

s9(2)(a)

s9(2)(a)

s9(2)(a)

Kia ora e hoa ma.

He iti, He pounamu

It may be small but it is very precious

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

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

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

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

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

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

I strongly Oppose Herds Of Special Interest (HOSI)

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

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

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

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

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

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

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

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

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

Plan objectives:-

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

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

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

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

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

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

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

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

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

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

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

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

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

Strategies are vague :-

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

Monitoring provisions;-

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

Poor enforcement provisions

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

Benefits –

These are limited to hunting experience only in the documents.

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

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

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

What are the benefits for the general public?

Setting precedents:

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

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

Costs.

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

WE NEED TO BE A VOICE FOR NATURE

Whakataukī

Titiro whakamuri, kōkiri whakamua

Look back & reflect so you can move forward

He iti, he pounamu.

It may be small but it is very precious

Rangimārie,

Jenny Campbell

QSM for the Environment

Resources

▪

Wapiti HOSI Briefing to Minister

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

▪

Sika HOSI Briefing to Minister

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

▪

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

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

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

- https://newsroom.co.nz/2025/12/01/unruly-deer-set-up-camp-in-new-zealands-most-precious-places/?utm_source=Newsroom&utm_campaign=be54138e1f-Sunday+Briefing+07.12.2025&utm_medium=email&utm_term=0_71de5c4b35-be54138e1f-97942556&mc_cid=be54138e1f

Luke Care - New Zealand Tahr Foundation

Submission Details

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

In my personal capacity I have hunted wapiti six times, and each has been a highlight of a busy hunting career supported by my role as editor of NZ Hunter Magazine. I hunt a lot, across the country, a highly value wapiti hunting as an aspirational experience.

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

Luke Care

Debbie Care

Submission Details

Dr Debbie Care

s9(2)(a)

s9(2)(a)

Submission on the Draft Fiordland Wapiti Herd of Special Interest – Herd Management Plan

To: Department of Conservation & Minister for Hunting and Fishing

To whom it may concern,

I am writing to provide my submission on the *Draft Fiordland Wapiti Herd of Special Interest Herd Management Plan*. I wish to state clearly that I support the proposal and the designation of Fiordland wapiti as a Herd of Special Interest under the Game Animal Council Act 2013. In my view, this framework provides the strongest, most coherent pathway to achieving improved ecological outcomes, a high-quality hunting experience, and durable long-term management of the herd.

1. Support for the Herd of Special Interest Designation

I support the proposed designation as an effective mechanism to balance conservation and hunting values in one of New Zealand's most ecologically significant landscapes. The HoSI structure provides clarity, accountability, and a strong governance framework that has been lacking to date. This approach recognises the unique cultural, social, biodiversity, and recreational context of the Wapiti Area and appropriately integrates these into management decisions.

2. Strong Support for the Plan's Ecological Objectives

I endorse the Plan's explicit focus on protecting indigenous vegetation, restoring ecological processes, and reducing browsing pressure from deer. The proposed use of targeted control, ongoing suppression, and professional operations, combined with hunter-based management is, in my view, the most effective and cost-efficient way to achieve ecological recovery in Fiordland.

I also support the requirement for robust ecological monitoring across alpine and forested environments. The planned use of established DOC monitoring standards and annual reporting will provide clarity on whether vegetation recovery is occurring.

3. Support for Hunter Stewardship and Conservation Partnership

I strongly support the Plan's emphasis on hunter responsibility and participation in conservation outcomes. The Fiordland Wapiti Foundation has demonstrated long-standing capability in deer removal, predator control, hut maintenance, and operational management. Continuing and strengthening that partnership is essential.

The framing of hunters as caretakers rather than mere users is an important shift and will lead to better long-term outcomes for both the herd and the wider ecosystem.

4. Support for Maintaining the Bugle Ballot and Hunting Management System

I support the continued use of the ballot and block system during the bugle period. This system:

- protects the wilderness hunting experience

- ensures fairness and consistency
- assists with herd quality improvement and genetic selection
- provides a safe and well-managed model for high-demand access

The Plan's objective of producing high-quality bulls and maintaining appropriate sex ratios is sensible and well aligned with international best practice for herd quality management.

5. Support for Monitoring, Research and Annual Reporting

The commitments to regular monitoring, herd health assessments, research into deer impacts, and the publication of annual reports are essential for transparency and accountability. I support this approach and believe it will help ensure that management remains adaptive, evidence-based, and responsive to ecological change.

The requirement to review the Plan every five years is also appropriate and provides assurance that management settings will reflect new data and on-the-ground outcomes.

6. Support for Financial Sustainability

I support the intention to move the programme toward financial self-sufficiency through hunter fees, partnerships, and sponsorships. This is a reasonable and equitable model, provided fees remain fair and funds are reinvested into herd management and conservation priorities within the Wapiti Area.

7. Overall Position

Overall, I consider the Draft Herd Management Plan to be balanced, practical, and well aligned with both conservation and recreational values. It provides a clear pathway toward ecological improvement, improved herd quality, accountability through reporting, and continued collaboration between DOC, the Game Animal Council, the Fiordland Wapiti Foundation, and the wider hunting community.

I fully support the proposal and recommend that the Fiordland Wapiti Herd of Special Interest be designated as outlined.

Thank you for the opportunity to submit.

Ngā mihi,

Dr Debbie Care

Environmental Scientist & Agricultural Consultant

Trevor Chappell

Submission Details

Eirwen Harris Mitchell

From: Trevor Chappell (NPP) s9(2)(a)
Sent: Saturday, 29 November 2025 11:29 am
To: wapitiHOSIHMP
Subject: submission

Categories: Green category

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HOSI for Wapiti deer in the "Wapiti Area" of Fiordland National Park

The proposal by the Fiordland Wapiti Foundation (FWF) and the Game Animal Council (GAC) is a great initiative and worthy of Government implementation. It not only allows the harvesting of trophy wapiti stags by both New Zealand and International hunters, but also the culling of non-wapiti type animals which are processed into highly desirable meat. The financial constraints currently influencing the operations of the Department of Conservation will be offset by the FWF and its large group of volunteers. The HOSI still allows both WARO and FWF to harvest excess animals to provide better environmental outcomes. An added benefit of a HOSI in the Fiordland National Park will be the continued Conservation efforts currently undertaken by the FWF, particularly in pest trapping in extremely difficult terrain.

I therefore support the HOSI for the Wapiti herd.

T.O. Chappell

s9(2)(a)

s9(2)(a)

Ruth Clements

Submission Details

Eirwen Harris Mitchell

From: ruth Clements s9(2)(a)
Sent: Sunday, 7 December 2025 6:13 pm
To: wapitiHOSIHMP; SikaHerdOfSpecialInterest@doc.govt.nz
Subject: Submission on the Draft Sika and Wapoti Herds (HOSI) Management Plans

Categories: Green category

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Ruth Clements-Jones

s9(2)(a)

s9(2)(a)

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. I am also shocked to hear that it is likely this decision is already going ahead.

These animals are not native and are responsible for devouring native saplings from the understory creating open space beneath the canopy trees in our native forests. This clearing of regrowth diminishes the regeneration of the forests, causes drought and wind which exposes roots and kills the canopy trees which then creates more gaps and the forest is then under threat of demise. Through bad decisions such as these being proposed, we already have uncontrolled pest species in the form of possums, stoats, ferrets, German wasps, wild goat, wild pig, catfish, and the list goes on.

It would be better for our native forests to eradicate deer. We need to treasure and be responsible guardians of our unique New Zealand ecosystems.

For the sake of the forest ecology, please stop this before it starts.

If this ruling is not possible to prevent-

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. 🌱

Ru

Ruth Clements-Jones

Mob s9(2)(a)

Linda Conning

Submission Details

Eirwen Harris Mitchell

From: s9(2)(a)
Sent: Monday, 8 December 2025 11:46 am
To: wapitiHOSIHMP
Subject: Wapiti HOSI draft HMP Submission
Attachments: HOSI submission wapiti Final.docx

Categories: Green category

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Please find attached my submission.

Linda Conning

s9(2)(a)

s9(2)(a)

s9(2)(a)

s9(2)(a)

Department of Conservation,
P.O. Box 4715
Christchurch 8140
Attn: Wapiti HOSI draft HMP Submissions
Email: wapitihosihmp@doc.govt.nz
8 December 2025

**SUBMISSION ON DRAFT HERD MANAGEMENT PLAN
WAPITI HERD OF SPECIAL INTEREST**

INTRODUCTION

1. I was a member of the New Zealand Conservation Authority for 9 years and have a very good understanding of conservation policy and law. I have a Master's degree (1st class Hons) in Resource and Environmental Planning. In 2017 I was awarded a Queen's Service Medal for services to conservation.

2. I wish to speak to my submission.

3. I oppose this proposal.

4. There is no evidence to show that recreational hunting in the Wapiti Area has any appreciable benefit to the reduction of browse of native plants in the national park. Recent reports from credible sources (Manaaki Whenua Landcare Research) indicate this. Research in the Northern Te Urewera Mainland island in the 1990s showed that deer densities needed to be almost zero to allow for plant regeneration. This has been confirmed by other ecologists, most recently Dr Bruce Clarkson.

5. Browsing animals continue to degrade the indigenous biodiversity of the National Park and Te Wahi Pounamu World Heritage Area.

6. All game animals in New Zealand are continually modifying our natural heritage by browsing (and exterminating) palatable native species in our native forests and high country. In most national parks, the forest understorey is either depauperate (in some cases non-existent), or limited to unpalatable species, mostly ferns and shrubs such as

horopito and divaricating shrubs. “Leafy greens” such as large leafed Coprosmas, five finger and seedlings are rare, often only found on banks where ungulates cannot reach.

7. Contrary to the opinion of hunters, recreational hunting is **not** effective in reducing the damage of these animals to a level to enable regeneration. The lack of ground and shrub species means that there is less food for birds, who feed on berry-producing species and having an ongoing threat to our already threatened wildlife, and exacerbates flooding by increasing run-off.
8. The so-called Wapiti Area has no designation in the Fiordland National Park Management Plan to provide for a manged herd (essentially farmed in a national park) of exotic animals to have priority over the indigenous biodiversity.
9. It is unacceptable that a damaging exotic species should be able to be farmed in a National Park or a World Heritage Area.
10. The draft management plan is very general and its objectives are incompatible e.g. Objectives 1 and 2. There is no way that ecological processes can be restored by allowing the area to be managed for hunting.
11. An economic argument is used to justify this proposal. However if the funds allocated to the Game Animal Council, and the Fiordland Wapiti Foundation, both to date and in the future, were actually used directly to remove deer from the National Park, it is likely there would be greater benefit.
12. There are no incentives for hunters to target females to reduce populations or guarantees that the plan will be self-funded (these proposed actions use the non-committal wording “seek”) and 4.3 indicates there is likely to be on-going expenditure from DoC.
13. Scarce conservation funding should go towards pest (i.e. deer/wapiti) control, not administering a scheme to benefit only hunters, and not other users.
14. It is also not clear what and how monitoring will be done and what steps taken if the objectives are not being achieved.

CONCLUSION

The proposal should be withdrawn.

Mike Corkery

Submission Details

Eirwen Harris Mitchell

From: Mike Corkery s9(2)(a)
Sent: Monday, 8 December 2025 10:13 pm
To: wapitiHOSIHMP
Subject: Fiordland Wapiti HOSI Management Plan Committee

Categories: Green category

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The Chair,
Fiordland Wapiti HOSI Management Plan Committee

I write on my own behalf in support of establishing a Wapiti Herd Of Special Interest.

I value the herd's history and heritage. Hunting wapiti is a rather unique activity - worthwhile and enjoyable in its own right and with a long tradition and heritage that involves hut and track maintenance, the clearing of pest traplines and the culling of red and hybrid deer and any inferior opportunity stags from the Wapiti herd area. Wapiti hinds are also culled to achieve conservation goals.

The legacy of being able to pursue wapiti trophies allows NZDA members and their families the opportunity to enjoy the natural environment of the Fiordland Wapiti area. To be able to participate in this activity is a unique culturally significant privilege, one that we ought to cherish now and continue to do so in the future. It is a privilege and an opportunity that has been important to generations of hunters. It warrants support and encouragement.

The Herd Management Plan should foster hunter and community-led management. It will have positive social and economic outcomes for Te Anau and the wider Wapiti community area.

In my view, the Operational Plan must remain separate from the Herd management Plan.

All funds for the Wapiti HOSI should be collected by the Fiordland Wapiti Foundation (FWF) directly. No other commercial interest group eg. DoC, GAC or any other government body, needs to be involved in this process. The FWF must keep its autonomy so that hunters remain in charge of their futures. The FWF operates a user pays model and hunters have, successfully to date, funded the wapiti area conservation efforts and achievements at no cost to the taxpayer.

Financial reporting should not be a requirement of the Wapiti Herd Management Plan. It is the Fiordland Wapiti Foundation's responsibility to be financially sustainable and meet its legal obligations. It is a registered charity and some of its sponsors and partners may require confidentiality as part of their involvement.

Monitoring of actions and results should be low cost, efficient and effective. The FWF has over 20 years of experience and expertise, successfully operating a herd management plan and this should be continued with, without adding costly and time-consuming additional administration.

The HOSI should be set up under the GAC, with DoC being an independent 3rd party as the watchdog for the government.

Please remove the word "control" from the HOSI document. The Wapiti HOSI is not about control, it is about adaptive management of the Fiordland Wapiti Herd with game animal management and conservation outcomes as the focus.

I reiterate that we support the Fiordland Wapiti HOSI and ask for clarity to be paramount around how the HOSI is set in law in order to leave no room for ambiguity.

Regards,
Mike Corkery

s9(2)(a)